

## **Comments on Draft 2026 9% Low-Income Housing Tax Credit Qualified Allocation Plan A More Balanced and Inclusive Competitive Framework**

**To:** Ohio Housing Finance Agency

**From:** A Collective of Place-Based Development Advocates

**Date:** August 1, 2025

**Re:** Draft 2026 9% QAP Comments

### **Introduction**

The following comments are submitted on behalf of a collective of place-based developers and advocates from across Ohio.

We appreciate OHFA's commitment to advancing affordable housing development and thoughtful policy across the state. We support the new leadership team and recognize the complexity of developing a fair and effective allocation system.

We respectfully offer these comments to support the creation of a more balanced and inclusive allocation system – one that ensures every Ohio community has a fair opportunity to compete for critical housing resources.

We also would like to meet with OHFA in person to discuss these comments and other ways in which we can work together to create meaningful and effective policy.

### **Primary Concern: Over-Reliance of Mapping**

The draft proposes 75% of competitive scoring based on Opportunity and Housing Needs Index mapping. While we recognize the value of these tools, this heavy reliance creates several challenges:

***Geographic Exclusion:*** The maps effectively exclude entire communities from affordable housing investment, creating unintended geographic discrimination regardless of actual housing needs, community support, or development quality.

***Circular Investment Logic:*** By only investing in areas already deemed "high opportunity," communities needing investment to improve are excluded. This perpetuates inequality rather than addressing it.

***Local Market Disconnect:*** Housing markets are inherently local, but the maps use broad federal data that may not capture the nuanced reality of individual communities or neighborhoods.

***Place-Based Organizations at Risk:*** Ohio's rich history of community development corporations, innovative metropolitan housing authorities, and place-based developers may no longer be able to conduct their mission-based work in the communities they serve.

### **Secondary Concern: Removal of Policy-Based Pools**

The shift from project-type pools to regional pools creates competition based almost exclusively on

geography and cost efficiency, with little regard for project purpose, sound policy priorities, or long-term community impact.

***Uneven Competition:*** Housing types with fundamentally different roles - preservation, new construction, and service-enriched housing - are judged by identical criteria, creating an unfair playing field.

***Unclear Process:*** With all markets and project types competing together, it becomes difficult for developers to understand what OHFA prioritizes or how to create competitive applications.

## **Recommended Solutions**

### **1. *Rebalance Competitive Scoring***

- Retain opportunity and housing need indices as one component of a broader policy priority menu of options
- Reference approaches from Ohio QAPs between 2014-2023 for criteria that can be repurposed. There is no such thing as a perfect QAP, but each one likely has elements that were successful and would remain so today. We suggest OHFA complete an inventory of criteria previously utilized and then choose those that suit the agency's priorities today.

In example:

- Location Based Characteristics (2014/2015 QAP)
- Development Characteristic Priorities (2015 QAP)
- Neighborhood Development criteria (2018 QAP)

### **2. *Restore Policy-Based Pool Structure***

- Reinstate competitive pools by project type: New Construction, Preservation, and Service Enriched Housing
- Apply balanced scoring within each pool that includes multiple location, financial, and policy-based criteria

### **3. *Maintain Regional Equity***

- Continue geographic distribution safeguards through Strategic Initiatives and urban cities/suburban counties/rural counties distinctions within competitive pools
- Reference the effective geographic definitions used in the 2015 QAP (page 14) that minimized recent definitional issues

## **Benefits of These Modifications**

- Corrects oversimplifications and confusion from recent years that created unpredictability
- Preserves opportunity mapping as one valuable tool among many
- Encourages mission-driven development that strengthens neighborhoods
- Demonstrates OHFA's commitment to fair, data-informed decision-making

- Ensures accessibility of housing resources to all communities statewide

## Conclusion

A balanced approach that incorporates policy-based scoring and project-type pools will return OHFA to a more holistic, equitable allocation model.

This collective would welcome the opportunity to meet with OHFA leadership to discuss these recommendations further, and to formulate possible competitive criteria and pool definitions.

We are grateful for OHFA's commitment to stakeholder engagement and stand ready to work alongside agency leadership in building a competitive framework that serves all Ohioans.

## Signed in support by the following organizations:

### Akron Metropolitan Housing Authority

Herman L. Hill – [hhill@akronhousing.org](mailto:hhill@akronhousing.org)

### Bellwether Enterprise Real Estate Capital, LLC

Tony Love – [tony.love@bwe](mailto:tony.love@bwe)

### CHN Housing Partners

Andrew Bailey – [abailey@chnhousingpartners.org](mailto:abailey@chnhousingpartners.org)

### Cincinnati Metropolitan Housing Authority

Gregory Johnson – [Gregory.johnson@cintimha.com](mailto:Gregory.johnson@cintimha.com)

### City of Cleveland

Alyssa Hernandez – [Ahernandez2@clevelandohio.gov](mailto:Ahernandez2@clevelandohio.gov)

### The Community Builders

George Tabit – [George.tabit@tcbinc.org](mailto:George.tabit@tcbinc.org)

### Community Housing Network, Inc.

Ryan Cassell – [rcassell@chninc.org](mailto:rcassell@chninc.org)

### Cuyahoga Land Bank

Ricardo Leon – [Rleon@cuyahogalandbank.org](mailto:Rleon@cuyahogalandbank.org)

### Cuyahoga Metropolitan Housing Authority

Jeffery K Patterson – [jpatt@cmha.net](mailto:jpatt@cmha.net)

### East Akron Neighborhood Development Corp.

Cheryl Stephens – [cstephens@eandc.org](mailto:cstephens@eandc.org)

### Eden Haven Development

Stephen Davis – [sdavis@edenhaven.com](mailto:sdavis@edenhaven.com)

### Emerald Development and Economic Network Inc

Richard Carr – [rcarr@edencle.org](mailto:rcarr@edencle.org)

### Enterprise Community Partners

Hazel Remesch – [Hremesch@enterprisecommunity.org](mailto:Hremesch@enterprisecommunity.org)

### Erie Metropolitan Housing Authority

Ralph Chamberlain – [rchamberlain@eriemetrohousing.org](mailto:rchamberlain@eriemetrohousing.org)

### Famicos Foundation

John Anoliefo – [johna@famicos.org](mailto:johna@famicos.org)

### Geauga Metropolitan Housing Authority

Dawn Farrell – [dferrell@geaugamha.org](mailto:dferrell@geaugamha.org)

### Homeport

Aaron Wasserman – [aaron.wasserman@homeport.org](mailto:aaron.wasserman@homeport.org)

### LISC Toledo

Tom Kroma – [tkroma@lisc.org](mailto:tkroma@lisc.org)

### Lorain Metropolitan Housing Authority (Raise Up)

Judith Carlin – [jcarlin@rupartners.org](mailto:jcarlin@rupartners.org)

### Neighborhood Development Services

Stacy Brown – [sbrown@ndsohio.org](mailto:sbrown@ndsohio.org)

### NeighborWorks Collaborative of Ohio

Nathan Miner – [Nathan.miner@momentumstrategy.net](mailto:Nathan.miner@momentumstrategy.net)

### NHP of Greater Springfield

Rachel Goff – [rgoff@springfieldnhp.org](mailto:rgoff@springfieldnhp.org)

### Ohio Housing Authority Conference

Ashley Howell – [ashley@ohac.com](mailto:ashley@ohac.com)

Judy Carlin – [jcarlin@rupartners.org](mailto:jcarlin@rupartners.org)

### Rising Heights Inc.

Natalie Leek – [natalie@risingheights.org](mailto:natalie@risingheights.org)

### Sandusky Metropolitan Housing Authority

Ralph Chamberlain – [rchamberlain@eriemetrohousing.org](mailto:rchamberlain@eriemetrohousing.org)

### St. Mary Development Corporation

Wesley R. Young – [wyoung@smdcd.org](mailto:wyoung@smdcd.org)

Denise Blake – [dblake@smdcd.org](mailto:dblake@smdcd.org)