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Brad Carman
TFG Housing Resources
685 S. Front Street, Suite D
Columbus, Ohio 43206

Cody Price
9% Housing Tax Credit Chief
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, Ohio 43231

Subject: PY 2026-2027 9% Qualified Allocation Plan

Thank you for allowing comments to the 9% Qualified Allocation Plan. We have reviewed the first draft of the guidelines and would like to provide the following comments.

1. Application Limits

In reference to page 27 of the QAP, development teams that have placed in service between 1 and 3 projects in the last ten years are eligible for 2 submissions and 1 award. We believe this is overly strict, particularly when compared to the standards provided in OHFA's other competitive programs. For the sake of consistency across programs, we offer the following suggestions.

Suggestion 1: Align the application limits with the SFY 2026 OLIHTC guidelines. These guidelines allow for two awards for developers with one project placed in service within Ohio. A strong case can be made for using this standard given that OLIHTC transactions are typically more complex involving 4% credits, bonds, and multiple layered funding sources.

Suggestion 2: Make the development team thresholds cumulative for projects with 2 developers. For example, Developer "A" has placed in service 3 projects within Ohio in the last 10 years. Developer "B" has placed in service 5 projects within the last 10 years. With a combined total of 8 projects, the developers would be eligible for 2 awards so long as they apply for both projects together.

2. Document Requirements for Proposal Applications

In recent funding rounds, both the OLIHTC and BGF guidelines have significantly reduced the number of documents required to apply. This decrease in the documents required up front allows for a greater volume and diversity of applications. The current predevelopment risk developers must assume to apply creates a high barrier of entry for new developers and/or nonprofit developers. To the extent OHFA feels comfortable pushing these requirements to final application, we believe it will be extremely beneficial for all stakeholders.

3. Architectural Exceptions

In the 2025 9% competitive funding round, our organization participated in an application for a PSH project that required significant architectural exceptions. Despite our early efforts to gain clarity, OHFA declined to comment on the requested exceptions prior to the proposal deadline. After submitting the application, OHFA denied the exceptions, effectively eliminating the project from contention. We understand and respect OHFA's decision, and we strongly encourage

sgreater flexibility and transparency earlier in OHFA's process. Providing early and preliminary feedback on critical design elements, especially those tied to projects serving vulnerable populations like those in PSH settings, would help to ensure that development teams are not investing significant time and money into applications that are unlikely to be considered eligible or competitive.

Suggestion 1: Should a developer submit an FAQ about a potential exception request, we ask that OHFA consider the request at that time so long as the developer provides the relevant documentation.

Suggestion 2: At pre-application, in which programmatic exceptions can be requested, please allow for architectural exceptions as well. Developers can still retain the option of submitting them at proposal application, but this would at least provide a path for feedback earlier in the process.

4. Strategic Initiative Set-Aside

In reference to page 34 of the QAP, we would like to comment on the proposed language for the Community Impact Strategic Initiative Set Aside. The current language states that "preference will be given to counties not receiving an award in the last five years." We are fully supportive of that language. We would like to request a second evaluation criteria to be used. In the SFY2026 OLIHTC round, projects were also given preference for the set-aside if "they met a quantifiable need and target policy and/or geographic areas left underserved through the competitive selection process." We believe this is essential language as within populous counties, there are large areas that have not received awards in the last five years. Additionally, the metric "having not received an award in the last five years" does not distinguish between general occupancy, senior and PSH projects. A county that was awarded 100 units in the last five years, but only for senior and PSH, should be eligible for a general occupancy application to compete for the set-aside.

5. Minimum Threshold to Compete

One of the most concerning policies in the draft QAP is the introduction of a minimum Neighborhood Opportunity Index score as a de facto threshold requirement. Although this criterion appears within the competitive scoring section (see page 48), it functions as a hard cutoff effectively disqualifying proposals in census tracts that fall below the regional median, regardless of how well those sites perform on other metrics. We do support the establishment of a minimum threshold for scoring, but we don't believe it should focus on one singular scoring category. We believe this unfairly penalized areas have extremely high housing needs scores, but opportunity scores a tad below the median. We suggest creating a minimum cumulative score, such as 50 total points out of 100, which would encompass both the opportunity and housing needs scores.

We also encourage OHFA to reconsider this policy in the context of the QCT/Revitalization Plan Set-Aside. By embedding a rigid Neighborhood Opportunity Index threshold, the draft QAP excludes large portions of the state from eligibility particularly communities with a legacy of disinvestment, racial segregation, and economic marginalization. This approach risks concentrating LIHTC resources in only the highest-income neighborhoods, undermining the intent of the QCT/Revitalization set-aside and leaving behind areas most in need of reinvestment.

Rather than an either/or approach, the QAP should embrace a "both/and" strategy supporting opportunity rich neighborhoods while also ensuring that historically underserved communities remain eligible for critical investment. Restricting access to resources based on a single index score runs counter to OHFA's stated 2026 Annual Plan goal: "Prioritize compliance with the Fair Housing

Act of 1968 and administer funding programs in a manner that affirmatively furthers fair housing to protect renters and homeowners."

6. Special Needs Housing Scoring

In reference to the scoring sections of the QAP, we believe the current scoring metrics for special needs housing are extremely weighted towards geographic figures. For a PSH project to be successful, there are numerous non-geographic figures we believe OHFA should consider. For example, elements like strong service coordination, formal partnerships with local providers, and committed funding from the CoC or other local sources can significantly improve resident outcomes and long-term project success and yet these critical factors are currently undervalued in the current scoring framework.

Sincerely,



Brad Carman

President