

---

## QAP Public Comments

---

From Russell Winters <[rwinters@tendermerciesinc.org](mailto:rwinters@tendermerciesinc.org)>

Date Fri 8/1/2025 11:37 AM

To QAP, OHFA <[QAP@ohiohome.org](mailto:QAP@ohiohome.org)>

You don't often get email from [rwinters@tendermerciesinc.org](mailto:rwinters@tendermerciesinc.org). [Learn why this is important](#)

**CAUTION:** This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to or click the Phish Alert Button if available.

Dear OHFA:

Tender Mercies is grateful for the collaborative process that OHFA utilizes to develop its Qualified Allocation Plan. OHFA is clearly committed to its mission and the staff demonstrate that in all they do.

Tender Mercies is in agreement with the input provided by several of our peer agencies and other stakeholders in the supportive housing arena and offers the following comments:

### **Expanding the Service Enriched Pool to Other Populations**

Tender Mercies recommends re-convening the state partners that created the *Ohio Interagency Council on Homelessness and Affordable Housing Permanent Supportive Housing Policy Framework* before any significant changes are made to the Service Enriched tax credit pool; given the amount of time and energy dedicated by the participants of the Framework group to creating the Framework, as well as the representation of many who are involved with OHFA's new populations, we feel that it is important to convene these stakeholders to make clear priorities for the use of these critically needed resources.

Overall homelessness in Ohio increased by 3% from 2023 to 2024 to 11,759 individuals. In an era of growing homelessness and a significant lack of affordable housing, expanding the Service Enriched pool populations without increasing the pool sufficiently to ensure at least as many PSH projects are awarded does not make sense.

### **Expert Recommendation: Support Documentation**

Tender Mercies recommends OHFA require *additional* information in the Letter of Recommendation including the following:

- Funding resources that an expert entity has outlaid for supporting the target population and whether the proposed project would be able to apply for this funding if the project were built
- The expert has evaluated the proposed project's Service Plan, including the project's service provider and service plan budget and sources and agrees that the plan is reasonable and uses documented best practices and has a good chance for success
- The expert will either serve as a coordinated referral agency for the community to the project or support the project long-term by marketing the project and its units to the target population for no less than 15 years

Additionally, Tender Mercies recommends the Supportive Service Plan be due at initial application rather than final.

The success of supportive housing projects and the tenants it serves lives in part in an experienced provider's ability to provide robust and well-funded supportive services.

### **Neighborhood Opportunity Index: 40% of Total Score**

Supportive Housing development teams have experienced unprecedented level of opposition in recent years. Coupled with local zoning issues, it is growing increasingly difficult to identify viable sites for supportive housing. The scoring criteria related to high opportunity areas, low poverty rates and low unemployment rates only add to the challenge. While Tender Mercies appreciates the intent of such scoring criteria, it doesn't honor the real time challenge of siting supportive housing projects as well as the fundamental difference between supportive housing and affordable housing. Affordable housing is rightly evaluated by market conditions for long-term feasibility while supportive housing operators are incentivized from their local Continuum of Care's and HUD to help tenants 'Move-On' when they no longer need the intense services that PSH provides. This speaks to the underpinnings of tenant success in supportive housing; access to robust and tenant centered services and key community amenities are primary to creating housing stability, not market conditions.

We request that transportation, access to basic amenities (including grocery stores with fresh food), medical and other services be the focus of location criteria. Giving this category such significant weight at 40% of the total score overly values conditions that don't actually help make supportive housing high quality; it only makes it significantly harder to site and be competitive.

### **Housing Needs Index: 35% of Total Score**

It is essential to connect competitive scoring criteria to the specific need for housing types. However, the need for supportive housing, particularly as outlined in the Interagency PSH Policy Framework, is not adequately captured through traditional housing needs analysis, such as OHFA's Housing Needs Index. We propose that OHFA have a Housing Needs Index score for the Special Needs Housing Pool that more accurately reflects the needs of the populations this pool serves. For example, data collected by Continuums of Care, such as the Point-In-Time (PIT) Count and the Housing Inventory Count (HIC) could be used to create state priorities for supportive housing development. Tender Mercies strongly recommends that any scoring related to supportive housing needs be based exclusively on data specific to the target population. Traditional market analyses—such as those used in mapping tools—do not reflect the unique and critical needs of these populations and should not be used as proxies.

Once again, thank you for the opportunity to provide input in this process.  
Thank you in advance for your consideration.

Russell Winters

### **Russell L. Winters**

(he, him)

### **Chief Executive Officer**

Tender Mercies Inc.

Please note our office address has changed to:

635 West 7<sup>th</sup> St., Suite 300 Cincinnati, OH 45203

Office | 513.639.7054

Cell | 513.407.0961

Fax | 513.639.7037

[rwinters@tendermerciesinc.org](mailto:rwinters@tendermerciesinc.org)

[www.tendermerciesinc.org](http://www.tendermerciesinc.org)

