

To: [QAP@ohiohome.org](mailto:QAP@ohiohome.org)  
From: George Tabit, Senior Vice President, The Community Builders  
Date: 8/1/2025  
CC: Dr. Cody Price, 9% Tax Credit Section Chief

**RE: Draft 9% LIHTC Qualified Allocation Plan (2026-27)**

On behalf of our organization, along with the communities we serve, The Community Builders (TCB) offers these comments in response to OHFA's published draft 2026-27 QAP. This feedback combines observations made in reviewing the draft, reviewing OHFA's Housing Needs Assessments, and supporting OHFA and HUD data.

TCB appreciates OHFA's goals to evolve its policies to help meet Ohio's housing needs. As in prior years, TCB appreciates Section Chief Price's transparency on the drafting process and intent, as well as his willingness to consider adjustments to the draft to get to the best possible policy instrument and housing outcomes.

**Community Revitalization Plans.** TCB strongly supports the newly added set-aside for projects in a Qualified Census Tract with a Concerted Community Revitalization Plan. This addition acknowledges the valuable role that investments in high quality, affordable housing can play in the neighborhood revitalization process. By investing in well-coordinated revitalization plans, OHFA's investments leverage new investment across entire neighborhoods, generating an upward spiral that stabilizes naturally occurring affordable housing and reverses other negative trends. In this way, OHFA's impact on affordable housing is multiplied many times over with each such award.

**Recommendation:** The current emphasis on opportunity scoring is likely to direct these set aside awards to neighborhoods where positive transformation is already well underway and does not require further intervention. We encourage OHFA to establish alternative scoring criteria to target neighborhoods where this dynamic remains in the very early stages. Possible alternative selection criteria for community revitalization could include:

- *Leveraging of scarce public and philanthropic resources:* Community revitalization plans that are accompanied by significant matching investments from non-OHFA sources are an indication of a plan that is likely to succeed. We encourage OHFA to be awarding points for proposals that include significant matching funding commitments.
- *Commitment of signature funding resources.* Proposals that have received signature funding commitments (for instance HUD Choice Neighborhoods) are opportunities for the state to support objectively defined neighborhood transformation initiatives that drive significant leverage into Ohio housing. In the 10+ years of the Choice Neighborhoods program, HUD Choice Neighborhoods has leveraged state and local resources with over **\$4.5 million** through 10 planning grants, and over **\$109 million** through implementation and supplemental grants to advance housing transformation goals.

TCB values its longstanding partnership with OHFA and remain committed to working collaboratively to ensure the QAP supports the production and preservation of affordable housing across Ohio. Thank you for your consideration of these comments. We welcome further discussion as the QAP is finalized.