
2026 QAP Draft 1 Feedback

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To QAP, OHFA <QAP@ohiohome.org>

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Dear OHFA,

As always, thank you for the opportunity to give feedback on the first draft of the QAP. Below are some of our thoughts.

Page 19 – Broadband Infrastructure and Wi-Fi Access

Requiring broadband infrastructure in all developments is good policy and aligns with national best practices. However, mandating free in-unit Wi-Fi for every household creates a cost burden that far exceeds what is typically offered even in market-rate or hotel environments. A more balanced approach would be to require free Wi-Fi access in common areas (similar to a hotel lobby or common space), which provides value to residents without unduly impacting operating budgets. Mandating free Wi-Fi in all units could reduce a project's ability to support permanent debt, thereby increasing financing gaps and making deals harder to structure.

Page 19 – Building Amenities as Threshold Requirements

Requiring all projects to meet the same amenity thresholds, regardless of context, may unintentionally penalize certain developments, especially urban scattered-site or historic preservation projects. These developments often have limited space and must work within strict physical and regulatory constraints. For instance, amenities like outdoor patios, playgrounds, dog parks, or smoking pavilions may not be feasible for an existing building—but the surrounding neighborhoods might already offer these features.

We recommend that OHFA allow a “Preservation Amenity Waiver” option, in coordination with the OHFA architect, to enable applicants to propose contextually appropriate alternatives. Without this flexibility, developers may feel compelled to include non-functional or redundant features solely to meet QAP thresholds, which serves neither tenants nor long-term property operations.

Additionally, many of the listed amenities significantly increase development costs. At a time when construction and financing costs are under intense scrutiny, we should be cautious about introducing further cost drivers into the threshold criteria.

Page 25 – Clarify “Previously Assisted Project Eligibility”

Please clarify whether the “Previously Assisted Project Eligibility” section applies only to prior OHFA HDAP funds or also to HOME funds provided by other entities (e.g., cities or counties). Most preservation projects include some form of local public financing, and clarification would reduce confusion during application preparation.

Page 26 – Discretionary Basis Boost

We appreciate and support the continued inclusion of a flexible Discretionary Basis Boost policy.

Page 27 – Mentor Developer Policy

It's unclear what tangible benefit is offered to Mentor Developers. If there is no advantage in terms of additional application slots or awards, it may discourage experienced developers from assuming the additional responsibility of mentoring. We suggest offering Mentor Developers one additional application and/or award if they partner with an emerging or less experienced developer. This would meaningfully incentivize partnerships and fulfill the intended goal of capacity-building across the development community.

Page 28 – Compliance Monitoring Fee

Why has the Compliance Monitoring Fee increased again? This fee saw a significant bump in recent years. Any further increase should be accompanied by a justification, especially as developers are managing tighter operating budgets and higher service expectations.

Pages 32 & 35 – Funding Priorities

We appreciate OHFA's effort to clarify funding priorities, but we recommend additional examples or a visual flowchart to help applicants better understand how funding will be allocated across priority categories. The current language remains somewhat ambiguous.

Page 33 – Census Tract Limitation

The proposed limitation is a positive step toward improving geographic distribution and targeting areas of greater need.

Page 37 – Deep Income Targeting (30% AMI Requirements)

The cumulative requirement of 10–15% ELI units plus 20% 811 units results in general occupancy projects potentially reserving up to 35% of units at 30% AMI. While serving extremely low-income populations is important, this level of deep targeting can disrupt income diversity within buildings, concentrate poverty, and jeopardize operational stability without the backing of project-based subsidies. It also significantly reduces a project's ability to support debt, thereby increasing reliance on scarce subsidy resources. A more balanced income mix policy would better support both financial feasibility and long-term neighborhood integration.

Page 41 – Infeasibility of 4% Transactions

The current language on demonstrating the infeasibility of 4% tax credit transactions is vague. Nearly all 4% deals are technically feasible with enough subsidy or a small enough scope. What specific criteria will OHFA use to judge infeasibility? For example, if a project's paid developer fee is only \$400,000, does that qualify as infeasible? We suggest increasing the minimum unit threshold to 75 or 80 units to ensure that competitive awards are truly reserved for projects that cannot be reasonably executed in the 4% space. Developers are unlikely to choose the more competitive 9% round unless the 4% path is truly unworkable.

Page 48 – Threshold Opportunity Index

The proposed minimum Threshold Opportunity Index could unintentionally "redline" large portions of the state by making them ineligible for competitive applications. This would especially disadvantage projects in Qualified Census Tracts, areas with Revitalization Plans, and rural communities. Preservation and PSH projects, in particular, may not align with these thresholds, yet serve critical populations. We urge OHFA to remove or revise this threshold to avoid negative political and equity consequences.

Page 53 – Federal Historic Tax Credit Requirements

The revisions to this section are a welcome improvement and better align the actual FHTC process.

Lien and Litigation Reports:

This requirement adds both cost and confusion. It appears that lien and litigation reports may be required three separate times: before application (#14), at proposal, and again at final application (#20). Please clarify the timing and streamline the requirement where possible to reduce duplicative expenses.

Thanks.

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