



August 1, 2025

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

RE: First Draft 2026-2027 9% LIHTC Qualified Allocation Plan Public Comments

Dear Dr. Price,

The NRP Group thanks the Ohio Housing Finance Agency for the opportunity to comment on the first draft of the 2026-2027 9% LIHTC Qualified Allocation Plan. Producing a document to direct affordable housing policy for the State of Ohio is a monumental endeavor and we appreciate the diligence in producing the QAP. We recognize that it is the culmination of significant stakeholder and advocate engagement and it is no small task.

The NRP Group applauds OHFA for continuing to recognize the challenges of cost increases and tying the LIHTC award limit to inflation. Additionally, allocating credits proportionally by region is a welcome change to the QAP.

The logic behind making categories which were scored in prior QAPs is understandable, we would raise caution with adding an onslaught of threshold requirements that increase the cost of construction as well as operating costs. The Agency presents data related to costs to the Board and Multifamily Committee on a monthly basis, and should understand while costs have leveled off since the historic increases following the pandemic, they do remain elevated and have increased recently. Additionally, builders are experiencing a high degree of unpredictability because of shifting tariff policies and natural disasters. The NRP Group requests that newly added threshold items be considered for competitive points as in prior QAPs.

The NRP Group requests additional clarification on geographic scoring priorities. When selecting sites it is helpful to have certainty on how the application will be scored. Including the equation that will be used in the future AHFA will help developers in their site selection process.

It is admirable to incentivize locating LIHTC development in designated high opportunity census tracts, other priorities must be considered. The NRP Group asks OHFA to consider the addition of more scoring categories to recognize that LIHTC development is an important tool in community and neighborhood development. In the current draft of the QAP, 75% of the score is determined by just two metrics that are tied to census tract. This will continue to force developers to the small subset of census tracts that score high in both inversely related categories. This could lead to an unintentional concentration of LIHTC properties in a small number of census tracts. This has been demonstrated in recent OHFA funding rounds.

Additional scoring criteria would help mitigate the clustering of LIHTC applications in a few census tracts. The NRP Group suggests incentivizing Transit Oriented Development and incentivizing sites with access to public transportation on TOD corridors. This is especially important for seniors who may no longer driving. Additionally, consideration of scoring categories that drive developers to provide social engagement for seniors and multigenerational housing sites should be incentivized given the loneliness epidemic among seniors (<https://www.healthyagingpoll.org/reports-more/report/trends-loneliness-among-older-adults-2018-2023>). An additional category of housing policy priorities could be added, allowing up to 10 points to be scored by meeting a number of policy priorities (i.e. +5 points for being located on a recognized TOD corridor, +5 points for multigenerational housing, etc). This could be a way to balance the opportunity score of a site that still provides much needed a high-quality affordable housing in an amenity rich area.

Overall, OHFA should be commended for this draft of the 2026-2027 9% LIHTC Qualified Allocation Plan. The effort behind this draft does not go unnoticed.

Sincerely,

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Cc: Bill Beagle, Executive Director