

September 2, 2025

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

**RE: 2026-2027 QAP, Second Draft Comments**

Dear Dr. Price,

As the 2026 Qualified Allocation Plan drafting period draws to a close, the Affordable Housing Alliance of Central Ohio (AHACO) wants to recognize and share our appreciation for all the improvements incorporated into the plan that better position Ohio for success.

We are particularly grateful for your decision to eliminate the minimum threshold that required all family housing be in a “high opportunity” census tract. Protecting access to these public resources for all neighborhoods is monumentally important for residents and communities alike.

We also remain thankful for OHFA’s continued efforts to achieve geographic funding balance throughout the State. The regional allocations are a creative step toward this goal, and we look forward to seeing this policy unfold and learning lessons that can be incorporated into future funding rounds.

Today, we can begin monitoring and assessing these impacts to best prepare for the policymaking work that lies ahead, not only in the competitive tax credit program, but also in the Bond Gap Financing and O-LIHTC programs. As we prepare for those conversations, the following issues will grow in prominence and urgency:

**1. Producing excellence.** Comprehensive state housing strategies are constantly in pursuit of four co-equal qualities of housing excellence, which require careful balancing and purposeful innovation: 1) location, 2) operator quality, 3) cost efficiency, and 4) the power of the project to meet its community’s needs. This year’s QAP will provide a hyper-focus on location and cost efficiency, allowing us to isolate and study outcomes based singularly on these elements; in the coming years, we encourage OHFA to resume its broader focus and refine how all four priorities are evaluated and strengthened.

**2. Preparing for growth.** Central Ohio has emerged as a national jobs hub, drawing in new residents to meet swelling workforce demand. This makes us unique not only in Ohio but much of the Mid-West. How the QAP measures and adapts to these market changes will be

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Beacon 360 Management  
The Columbus Foundation  
Columbus Housing Enterprise  
Columbus Metropolitan Housing Authority  
Columbus Urban League  
The Community Builders  
Community Development for All People  
Community Housing Network  
Community Shelter Board  
COMPASS at Broad Street Presbyterian Church  
Creative Housing/Creative Renovations  
Fairfield Homes  
Finance Fund  
Franklinton Development Association

Habitat for Humanity MidOhio  
Home for Families  
Homeport  
Homes on the Hill  
Huckleberry House  
Impact Community Action  
Jewish Family Services  
Legal Aid Society of Columbus  
Lutheran Social Services  
Nationwide Children's Hospital  
National Affordable Housing Trust  
National Church Residences  
NRP Group

Ohio Capital Corporation for Housing  
Partners Achieving Community Transformation  
Preservation of Affordable Housing  
The Refuge  
Renter Mentor  
The RISE Center  
Star House  
TFG Housing Resources  
United Way of Central Ohio  
Wallick Communities  
Woda Cooper Companies  
YMCA of Central Ohio  
YWCA Columbus

essential for maximizing Ohio's economic development potential. While Central Ohio is a commercial hotspot today, ensuring that housing keeps pace is critical to avoid future economic drag. Lessons learned here will help OHFA prepare to respond wherever growth occurs in the future.

**3. Preserving expiring subsidy.** New LIHTC construction alone simply cannot meet the State's need for extremely low-income housing. That complex objective requires blending resources, often pairing LIHTC with place-based subsidies, like the Section 8 or Rural Housing programs. In our region and others, tremendous energy is appropriately expended to build more affordable housing but, at the same time, we are losing subsidized properties with hundreds of deeply affordable units. Unless we stabilize these homes and protect naturally occurring affordable housing, we will struggle to stay ahead of housing need. Ohio has not yet optimized its preservation strategy to retain affordability for those at the lowest end of the economic ladder.

**4. Promoting buy-in.** The State cannot close the housing gap on its own; collaboration across all levels of government, including cities and counties, is essential. OHFA is in a uniquely powerful position to incentivize collaboration. Like the Residential Development Revolving Loan Program, OHFA can adopt scoring systems that reward locals for reducing barriers and creating resources. This approach amplifies OHFA's impact, fosters collaboration, and ensures that communities that innovate to reduce housing burdens can model success for others. Conversely, if OHFA reduces funding for cities that "step up to the plate," it risks creating a moral hazard that undermines progress.

**5. Protecting fairness.** OHFA has a responsibility to ensure that public resources are not used to commit discrimination, an obligation that is appropriately reflected in the Annual Plan. This QAP is the first time in a decade that OHFA is sanctioning housing discrimination against same-sex couples using public funds. In the future, A.I. technologies and reduced enforcement resources risk further destabilizing the fair housing landscape, placing more liabilities on state program operators to monitor for constitutional compliance. Readiness to lead is critical.

Housing policy is iterative by nature, building on lessons learned and growing stronger with each cycle. As always, the Affordable Housing Alliance of Central Ohio stands ready to support OHFA in ensuring that each new plan builds upon the last to deliver stronger, fairer, and more impactful housing outcomes across our State.

Thank you, again, for OHFA's leadership and partnership in this work.

Sincerely, 

Carlie J. Boos