



September 2, 2025

Mr. Bill Beagle, Executive Director  
Ohio Housing Finance Agency  
2600 Corporate Exchange Drive  
Suite 300  
Columbus, OH 43231

Re: COHHIO Comments on Draft 2 2026 9% Qualified Allocation Plan

Dear Mr. Beagle:

Thank you for the opportunity to provide comments on the second draft of the 2026 9% Qualified Allocation Plan (QAP). COHHIO deeply appreciates OHFA's leadership and continued commitment to ensuring access to safe, decent, and affordable housing for all Ohioans. We value our longstanding partnership with OHFA and are grateful for the opportunity to reflect on and respond to the proposed plan.

The Coalition on Homelessness and Housing in Ohio (COHHIO) is a statewide coalition of housing organizations, homeless service providers, and individuals dedicated to ending homelessness and expanding access to affordable housing. In addition to supporting the insights shared in letters from various special interest groups, this letter outlines COHHIO's primary priorities for your consideration.

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## Opportunity and Housing Needs Index

We appreciate OHFA staff's decision to remove the minimum threshold requirement under the Neighborhood Opportunity Index. This change mitigates disproportionate impacts on projects serving special populations and on developments in rural areas and legacy cities.

However, the continued weighting of 75% of competitive scoring on the Opportunity and Housing Needs Index mapping remains a significant concern. While these tools provide useful insights, their heavy influence on scoring presents several challenges:

- **Geographic Exclusion:** These maps risk excluding entire communities from affordable housing investment, potentially leading to geographic discrimination irrespective of actual housing needs, local support, or project quality.
- **Circular Investment Logic:** Prioritizing only "high opportunity" areas limits investment in communities that need it most—perpetuating disparities rather than addressing them.
- **Local Market Disconnect:** The maps rely on federal datasets that may overlook local market dynamics and the specific realities of individual communities.



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- **Impact on Community-Based Developers:** Ohio’s network of community development corporations, public housing authorities, and place-based nonprofits may be unable to continue their mission in the communities they know best.

We urge OHFA to consider reducing the scoring weight of these indices or introducing balancing factors to better reflect local needs and equity.

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### **Service Enriched Pool Expansion**

As noted in a separate letter submitted with Permanent Supportive Housing (PSH) stakeholders, COHHIO recommends revisiting the Ohio Interagency Council on Homelessness and Affordable Housing’s Permanent Supportive Housing Policy Framework in collaboration with relevant stakeholders before making significant changes to the Service Enriched tax credit pool.

Given the inclusion of additional populations in the second draft, we also recommend providing an enhanced credit allocation for this pool to ensure it remains competitive and viable.

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### **Balance of State Set-Aside**

We commend OHFA’s decision to separate Montgomery and Summit counties from the ‘Balance of State’ set-aside, as is currently done for Cuyahoga, Franklin, and Hamilton counties. This change will enhance the ability of rural communities to compete more equitably for tax credits.

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### **Tiebreaker Priorities**

COHHIO is deeply concerned about the removal of the highest percentage of 30% Area Median Income (AMI) units as the primary tiebreaker. This change undermines efforts to address Ohio’s most urgent affordable housing gap. The *Gap Report* illustrates this clearly:

- Ohio has only 40 affordable units available for every 100 extremely low-income (ELI) households (under 30% AMI).
- By comparison, there are 71 units per 100 low-income (LI) households (under 50% AMI).
- 71% of ELI households are severely cost-burdened—spending more than half their income on housing—compared to 25% of LI households.

We recognize the development challenges associated with serving extremely low-income households. However, these are challenges that mission-driven developers are uniquely positioned to address—precisely the kind of work the Low-Income Housing Tax Credit (LIHTC) program is designed to support.

We strongly encourage OHFA to reinstate the prioritization of 30% AMI units as a tiebreaker criterion to support deeper affordability and prevent further deterioration of housing access for the lowest-income Ohioans.

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Thank you again for your leadership and for your thoughtful consideration of these recommendations. COHHIO remains committed to working in partnership with OHFA to ensure equitable, inclusive, and impactful housing policy across the state.

Sincerely,

A handwritten signature in black ink that reads "Amy M. Riegel". The signature is fluid and cursive, with the first name "Amy" and last name "Riegel" being clearly legible, and "M." as a middle initial.

Amy M. Riegel  
Executive Director