

# **Comments on the Second Draft of the 2026-2027 9% Low-Income Housing Tax Credit Qualified Allocation Plan**

## **A More Balanced and Inclusive Competitive Framework**

**To:** Ohio Housing Finance Agency

**From:** A Collective of Place-Based Development Advocates

**Date:** 9/2/25

### **Re: Second Draft 2026 9% QAP Comments**

Previously, our collective of place-based developers and advocates from across Ohio submitted comments on the first draft of the QAP. This second letter is in response to the second draft of the QAP.

We are disappointed that the second draft of the QAP continues an over-reliance on Opportunity and Housing Needs Index mapping. This over-reliance will lead to geographic exclusion of many communities and will exclude many mission-driven, place-based developers that were historically instrumental in building the LIHTC industry in Ohio. The argument that maintaining set-asides is a replacement for a more thoughtful scoring system, as outlined in the draft changes memo, does not adequately address the issues our letter identified.

We are not alone in our concern as evidenced by the many comments that OHFA received. It is evident that most stakeholders are concerned about the proposed direction of this QAP and the over-reliance on Opportunity scoring.

Given the complexity of the QAP and the unpopular reliance on opportunity scoring, we worry that there is a great possibility for unintended consequences and politically unpopular scoring results. We recommend that OHFA make the current draft valid for a single year only. If OHFA is satisfied with the 2026 results, minimal changes can be made for the 2027 QAP. If, however, the results are strongly unpopular throughout the housing community, as we fear, having a single year QAP will allow for OHFA to make changes and rebalance policy.

To summarize, we respectfully offer two requests:

1. Make the 2026 QAP a single year QAP.
2. We would like to set up a meeting with OHFA to discuss our concerns about Opportunity Mapping and the other issues raised in our letters that support the creation of a more balanced and inclusive allocation system – one that ensures

every Ohio community has a fair opportunity to compete for critical housing resources.

We are grateful for OHFA's commitment to stakeholder engagement and stand ready to work alongside agency leadership in building a competitive framework that serves all Ohioans.

Submitted respectively on behalf of the organizations that signed on to the first draft comments.