

September 22, 2025

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

RE: CSH's Comments on Housing Development Gap Financing First Draft

Dear Mr. Beagle:

CSH appreciates OHFA's support for a non-tax credit capital HDGF round in 2025 and is pleased to see a significant increase in the funding pool. We have been working closely with several development teams focused on smaller supportive housing projects that have been awaiting the opening of this round. As OHFA moves forward with finalizing the guidelines, CSH would like to elevate the following concerns. Please note that these concerns align with our comments on the 2026 QAP: the evaluation of need and the identification of quality sites for supportive housing differ significantly from those for general affordable housing. Thank you for the opportunity to provide input. CSH welcomes continued dialogue and collaboration on this critical resource.

Placed-Based Impact

Neighborhood Opportunity Index: 15% of Total Score

Supportive Housing development teams have experienced unprecedented levels of opposition in recent years. Coupled with local zoning issues, it is growing increasingly difficult to identify viable sites for supportive housing. The scoring criteria related to high opportunity areas, low poverty rates and low unemployment rates only add to the challenge. While we appreciate the intent of such scoring criteria, it does not honor the real time challenge of sitting supportive housing projects as well as the fundamental difference between supportive housing and affordable housing. Affordable housing is rightly evaluated by market conditions for long-term feasibility while supportive housing operators are incentivized from their local Continuum of Care's and HUD to help tenants 'Move-On' when they no longer need the intense services that PSH provides. This speaks to the underpinnings of tenant success in supportive housing; access to robust and tenant centered services and key community amenities are primary to creating housing stability, not market conditions.

We request that transportation, access to basic amenities (including grocery stores with fresh food), medical and other services be the focus of location criteria. Accordingly, the criteria set forth puts rural and Balance of State proposals at a disadvantage as these communities categorically have higher rates of poverty and unemployment.

Housing Needs Index: 20% of Total Score

It is essential to connect competitive scoring criteria to the specific need for housing types. However, the need for supportive housing, particularly as outlined in the Interagency PSH Policy Framework, is not

adequately captured through traditional housing needs analysis, such as OHFA's Housing Needs Index. We propose that OHFA have a Housing Needs Index score for the Special Needs Housing Pool that more accurately reflects the needs of the populations this pool serves. For example, data collected by Continuums of Care, such as the Point-In-Time (PIT) Count and the Housing Inventory Count (HIC) could be used to create state priorities for supportive housing development. For non-homeless populations included in the PSH Policy Framework, relevant data sources may also include County Developmental Disability Boards, child welfare systems, and supportive service providers for Transition-Aged Youth. We strongly recommend that any scoring related to supportive housing needs be based exclusively on data specific to the target population. Traditional market analyses—such as those used in mapping tools—do not reflect the unique and critical needs of these populations and should not be used as proxies.

Submission Requirements

Conditional versus Committed Financing

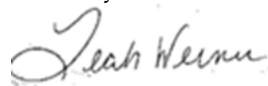
CSH respectfully recommends that OHFA consider an exception to the 60-day financial commitment requirement for projects seeking both HDGF and Federal Home Loan Bank (FHLB) of Cincinnati Affordable Housing Program (AHP) funding.

Under current timelines, project teams must first apply for FHLB AHP funds and then port the award to HDGF to meet OHFA's requirement for fully executed and dated financial commitments within 60 days of the HDGF application deadline. However, this sequencing presents a challenge: FHLB AHP awards are announced approximately four months after OHFA's final HDGF application deadline of July 16. As a result, projects that did not apply for FHLB AHP in calendar year 2025 may be forced to wait an entire year before applying for HDGF, significantly delaying development.

This timing misalignment makes projects less competitive for FHLB AHP, as the largest source of capital—HDGF—is not yet committed at the time of application. To better support development teams and ensure viable capital stacks, CSH urges OHFA to incorporate exception language for this capital cycle. This approach would enable projects to move forward with HDGF applications while awaiting FHLB AHP decisions and reestablish compliance with the 60-day commitment requirement in future years, as HDGF becomes a recurring capital source.

If you have any questions or require additional information, please feel free to contact me at leah.werner@csn.org or 937-329-1995

Sincerely,



Leah Werner
Director