
Commentary on draft HDGF Guidelines

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To Whom It May Concern:

Thank you for the opportunity to weigh in on the draft HDGF guidelines.

Please find my most important comments highlighted in yellow.

Program Calendar

- Given the delayed program calendar for 2026, we ask that OHFA shorten the window between final application and final approvals/financing closing

Experience and Capacity

- Please clarify that LIHTC development experience is **not** required for HDGF experience and capacity approval.

Threshold Requirements

- Suggest extra scoring for deeper affordability.
- Thank you for recognizing the need for a 70% non-PJ set-aside! We also recommend prioritizing non-LIHTC projects in the application process, or at least ha

Limits

- Non-PJs should be able to apply for an exception or be automatically granted an exception to apply for more than 50% of project costs (non-PJs should be a
- Recommend additional scoring points for longer-term affordability commitment through deed restrictions and/or community land trust ownership (more than 3
- The exception request form should include exception requests for both 10% withholding prior to the issuance of the final performance report and non-PJs' ab

Fees

- The application fees seem high for smaller HDGF projects in rural areas and smaller nonprofit developers

Competitive Scoring

- There are scoring factors outside of an applicant's control, including the Housing Index and neighborhood scoring systems, which will reduce the competitive
- A project should be able to receive points for project-based vouchers OR the ability to demonstrate a track record of success with housing choice vouchers a
- Given the unique HDGF program, which is designed to primarily support rural areas, non-PJs, and smaller projects, we recommend eliminating the HDGF/un
- The "outside funding commitments" calculation should be for the percentage committed at the time of application, not for the percentage of outside funding of
- Suggested addition: competitive scoring (or tiebreaker scoring) for projects that are additional phases of a multiphase project or expanding an existing projec
- Suggested project characteristics competitive scoring: proximity to amenities, provision of certain support services, partnerships that will benefit the residents
- Suggested readiness to proceed addition to competitive scoring; e.g. evidence of zoning approval (prior to final application)
- Suggested local support additions: commitment of local municipal resources (can be minimal but showing skin in the game), commitment of waived fees, and
- Suggested Energy Efficiency competitive scoring (Federal Home Loan Bank uses HERS scores of less than 75)
- Suggested populations additions: competitive scoring for serving special populations, including the elderly, disabled, homeless, returning citizens, immigrant

Tiebreakers

- Highest number of total units - we suggest removing this since the HDGF program is designed to meet the needs of smaller, rural communities and non-PJs,
- Highest Housing Need Index raw score - this is outside of an applicant's control - recommend removal

- Highest Neighborhood Opportunity General Occupancy Index raw score - this is outside of an applicant's control - recommend removal

I invite any questions you may have and appreciate OHFA's commitment to public input and transparency in the development of its funding guidelines.

Sincerely,
Emily Seibel

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