
Commentary on Draft HDGF Guidelines

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Date Mon 9/22/2025 4:36 PM

To QAP, OHFA <QAP@ohiohome.org>

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To Whom It May Concern:
Hello!

Please find my comments on the draft HDGF Guidelines below, with the 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

- 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 having a set-aside.

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 able to apply for 65% of total development costs, which is generally in line with the HUD per-unit subsidy limits)
- The exception request form should include exception requests for both 10% withholding prior to the issuance of the final performance report and non-PJs' ability to request more than 50% of project costs, and HUD per-unit cost limits
- Recommend additional scoring points for longer-term affordability commitment through deed restrictions and/or community land trust ownership (more than 30 years)

Fees

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

Competitive Scoring

- Given the unique HDGF program, which is designed to primarily support rural areas, non-PJs, and smaller projects, we recommend eliminating the HDGF/unit competitive scoring criteria altogether, as it is more suited to larger LIHTC projects. The primary reason why HDGF exists is to support non-PJs, which lack access to the kind of funding that exists in PJs and larger cities.
- The “outside funding commitments” calculation should be for the percentage committed at the time of application, not for the percentage of outside funding of overall project costs, for the aforementioned reasons. We recommend making these scoring criteria a demonstration of readiness to proceed.
- 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 and demonstrated availability of housing choice vouchers at the time of application through their MHA
- Suggested addition: competitive scoring (or tiebreaker scoring) for projects that are additional phases of a multiphase project or expanding an existing project
- Suggested project characteristics competitive scoring: proximity to amenities, provision of certain support services, partnerships that will benefit the residents' lives/wellbeing
- 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/or letter of support from the municipality for the project
- There are scoring factors outside of an applicant's control, including the Housing Index and neighborhood scoring systems, which will reduce the competitiveness of certain geographic areas in the state.
- 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, immigrants, and/or persons with developmental disabilities - could align with housing needs assessment

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, for which a larger project may not be suitable or wanted by the community

- Highest Housing Need Index raw score and Highest Neighborhood Opportunity General Occupancy Index raw score are outside of an applicant's control. Removal is recommended.

Thank you for the opportunity to provide input, and for your time and consideration.
Have a great day.

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Upcoming Important Dates:

Out of Office - Monday, September 29, 2025

Gatherings for Good: Salon Dinners on Affordable Housing - More dates to be announced in 2025! ([Click here for details & to be notified](#))

If the links above don't work for you, please let me know and I'll send them directly!

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