
Comments for 2026 HDGF

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Hello,

Thank you for considering our commentary on the first draft of the HDGF guidelines. We appreciate the effort to provide fair and balanced policy guidelines for the program, as well as the transparency and accessibility of the Ohio Housing Finance Agency throughout this process. Thank you for the opportunity to submit additional commentary.

Sincerely,

Emily Seibel,
Executive Director
Yellow Springs Home, Inc.

Commentary on the Second Draft of the HDGF Guidelines

Threshold Requirements

- Suggest extra scoring for deeper affordability

Funding Limits

- **Rural/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)
- Recommend an exception request option for subsidy per unit limits for rural/non-PJs
- Recommend additional scoring points for longer-term affordability commitment through deed restrictions and/or community land trust ownership (more than 30 years) - could also be a tiebreaker
- 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

Fees

- The application fees seem high for smaller HDGF projects in rural areas and smaller nonprofit developers (unchanged)
- Are the guidelines requiring a deferred developer fee? If so, we strongly discourage this requirement as it puts a new burden on smaller developers (page 23)

Competitive Scoring

- 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
- We are concerned about the set-aside for Permanent Supportive Housing and its impact on non-PSH project funding availability
- **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.

Suggested Additions:

- 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)
- Additional suggestions for competitive scoring: municipal support, serving priority populations (e.g. older adults), energy efficiency, service coordination partnerships

Tiebreakers:

- **Highest number of total units - we strongly 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, feasible, and/or wanted by the community**
- 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

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