



September 6, 2024

Cody Price
9% Housing Tax Credit Section Chief
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

Dear Dr. Price,

Thank you for the revisions made in the second draft of the *9% LIHTC Qualified Allocation Plan for Program Years 2024-2025 with 2025 Technical Amendments*. We appreciate OHFA's thoughtful consideration in reverting to the current two-year QAP structure, particularly by maintaining county caps and shifting certain items from competitive scoring to threshold criteria. These changes reflect the importance of stability and predictability for developers who plan and invest in projects based on the existing QAP. Given the additional changes introduced in this draft, the Ohio Housing Council offers the following comments.

Changes that impact scoring

Maintaining consistency in scoring criteria is critical throughout a two-year QAP cycle. Developers make substantial investments and secure properties based on the expectations set forth in the initial QAP, relying on these criteria to remain stable. The recent modifications to the Discount to Market scoring and the introduction of a new tiebreaker could disrupt this stability, unfairly jeopardizing projects that have been planned in good faith under the current guidelines.

Cure Period

We appreciate the new approach providing applicants with a reasonable opportunity to cure technical deficiencies in an application. This revised language represents a significant improvement. To ensure alignment with OHFA's intent, we suggest explicitly stating that the ability to provide supplemental or revised evidence during this period is meant only to clarify items that were included in the original application and that existed at the time of submission.

Thank you again for your consideration.

Sincerely,


Ryan Gleason
Executive Director