

February 12, 2026

Barbara Richards
Multifamily Housing Director
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231



Dear Ms. Richards,

On behalf of the Ohio Housing Council, thank you for the opportunity to comment on the first draft of the *State Fiscal Year 2027 Ohio Low-Income Housing Tax Credit (OLIHTC) Guidelines*. As the statewide trade association representing affordable housing developers, syndicators, architects, and service providers, OHC remains committed to the continued success of this program.

The OLIHTC program has been instrumental in addressing Ohio's housing shortage, enabling the creation of affordable homes—particularly in underserved communities—that would not be financially feasible with 4% LIHTC alone. As the program enters its fourth year, its success in the first three years has been notable. New programs are notoriously difficult to launch effectively, and the OLIHTC program's smooth implementation reflects both strong program design by OHFA and capable execution by Ohio's development community. This track record positions the program well as we look toward opportunities for extension and expansion, demonstrating that the investment is producing real housing for Ohioans who need it.

We offer the following comments on the draft guidelines:

Provisions We Strongly Support

Scoring Before Set-Asides

We appreciate OHFA's allocation process that ranks and selects projects based on competitive scoring first, then reviews whether set-asides have been met and makes adjustments as necessary. This approach prioritizes objective merit while ensuring policy goals are achieved and provides important clarity for applicants.

Single Project Meeting Multiple Set-Asides

We appreciate the clarity in the guidelines that a single project can fulfill multiple set-asides. This flexibility is valuable given Ohio's diverse geography and housing needs—for example, a single-family rental development in an Appalachian county could meet both the Single Family and Appalachian set-asides. This approach maximizes the efficient use of limited OLIHTC resources.

Requested Modifications

First-Tier Tiebreaker: Ohio-Based Developer Preference

We continue to recommend adding as the first tiebreaker a preference for projects whose **entire development team**—principals, co-developers, consultants, architects, and contractors—is based in Ohio.

Because this preference would apply only in the event of tied scores, it preserves competitive integrity while:

- Demonstrating Ohio firms' ability to deliver quality affordable housing;
- Delivering multiplier effects through locally sourced labor and services; and
- Strengthening the evidence that OLIHTC creates not only homes but also sustains Ohio jobs and businesses.

The current first tiebreaker (census tract without recent LIHTC award) would become the second tiebreaker, with all subsequent tiebreakers moving down accordingly.

Metropolitan Annual OLIHTC Per Unit Scoring Threshold

We recommend raising the 20-point scoring threshold in the "Annual Ohio LIHTC per LIHTC Unit" criterion for Metropolitan County projects from \$8,750 to \$10,000 per unit.

Current market conditions—including increased construction costs, higher interest rates, and inflationary pressures—have made the \$8,750 threshold increasingly difficult to achieve for otherwise efficient projects. This adjustment would better reflect actual development economics in metropolitan markets while maintaining the program's emphasis on efficiency and remaining well below statutory maximums.

We suggest adjusting the scoring bands proportionally upward to maintain appropriate differentiation across scoring tiers.

Request for Clarification

Strategic Initiative Set-Aside

We appreciate that the Strategic Initiative is available as a tool for OHFA to use when necessary. This provision serves an important function: it provides OHFA with limited discretion to address deficiencies in the balance of awards that may not be apparent until after competitive scoring is complete.

No scoring system, however well-designed, can anticipate every project type that might prove particularly beneficial to Ohio in a given year—or account for time-sensitive opportunities that align with state policy goals but don't fit neatly within traditional scoring

criteria. The Strategic Initiative gives OHFA the professional flexibility to respond to these situations when they arise.

However, our understanding is that unlike the mandatory set-asides (Appalachian, Single Family Rental Housing, and Transformative Economic Development), the Strategic Initiative is discretionary. OHFA should not feel obligated to utilize this set-aside if no appropriate project presents itself in a given round. We encourage OHFA to communicate this distinction clearly to avoid creating expectations that a Strategic Initiative award will be made annually regardless of circumstances.

Application Fee Payment Proof Requirements

The draft guidelines state that proof of application fee payment is a "non-curable item" at both proposal and final application. We'd appreciate clarification on the intent of this provision.

Our understanding from discussions with OHFA leadership is that the payment *itself* must be timely and cannot be cured if missed, but that the *proof of payment* can be submitted or corrected during the cure period if initially inadequate. This distinction is important and would benefit from explicit clarification in the guidelines to avoid confusion among applicants.

We also understand that the proof requirement addresses a practical challenge: bank records provided to OHFA often lack sufficient detail to match payments to specific applications, and requesting standardized proof from applicants at submission reduces staff time spent reconciling payments. This rationale makes sense, and we appreciate OHFA's attention to administrative efficiency.

We recommend the guidelines explicitly state: (1) that timely payment is required and non-curable, but (2) that proof of payment may be submitted or corrected during the cure period if the payment was made timely but proof was initially missing or insufficient.

Housing Development Loan (HDL) Maximum

We understand that HDL resources are limited and are allocated across multiple OHFA programs. We also understand from discussions with OHFA leadership that while the agency is willing to consider increases to the per-project HDL maximum, such increases would require amending current guidelines and to date have not been formally requested by applicants for specific projects.

As the OLIHTC program matures and project pipelines develop, we encourage both OHFA and the development community to monitor whether the current \$2.5 million cap constrains otherwise feasible projects. Should demand emerge that justifies a higher cap,

OHC would support OHFA's consideration of guideline amendments to maximize HDL's deployment within available resources.

Conclusion

The refinements proposed in these draft guidelines demonstrate OHFA's continued attention to program administration and effectiveness. As the OLIHTC program matures and demonstrates its value, we appreciate your partnership in advancing affordable housing across Ohio.

Thank you for considering these comments. OHC welcomes the opportunity to discuss any of these recommendations in greater detail.

Sincerely,



Ryan Gleason
Executive Director

cc: Bill Beagle, Beagle, Executive Director, Ohio Housing Finance Agency
Matt Sutter, Senior Director of Housing Programs, Ohio Housing Finance Agency