



December 23, 2025

To: All Interested Parties

From: Ohio Housing Finance Agency

Re: Frequently Asked Questions Effective January 1, 2026, for Design and Architectural Standards

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## FAQs Background

The following are based on comments or requests received regarding the [current Design and Architectural Standards \(DAS\)](#). Questions/Comments were edited for style and removal of identifying details, and similar questions were combined. The answers posted herein aim to clarify and modify the DAS during calendar year 2026. Questions are organized by their applicable DAS sections.

## F. Adaptability & Accessibility

### *OHFA Accessibility Design Requirements*

**Q Does the additional 5% of mobility units apply to all projects?**

**A** *Yes, however, OHFA recognizes that needs vary based on the population being served. The below minimums must be used.*

- *Senior or Tenant Populations with Special Housing Needs projects: 5% rounded up x2 for mobility units*
- *General Occupancy projects: 5% rounded up for mobility units and additional 5% rounded up of semi-ambulatory units (defined in F. Adaptability and Accessibility page 11)*
- *Affordable Assisted Living(AAL): 20% rounded up to a whole number for mobility units*

*Additional details are in the DAS and AAL guidelines.*

**Q What must be included in a Safe Harbor statement, and where should it be located?**

**A** *The Safe Harbor statement must clearly articulate a single 504 Safe Harbor for the entire property and may include a statement that it meets or exceeds other accessibility requirements per HUD's deeming notice. A Fair Housing Accessible statement cannot supersede or take the place of the single 504 Safe Harbor statement. It is best practice for 504 statements to be on the coversheet or the code compliance sheet of the plan set.*

**Q We are considering a renovation that does not appear to have an accessible path to the ground floor units. Is it possible to meet OHFA's accessibility and Universal Design requirements?**



A Yes, to the maximum extent feasible based on a review completed by OHFA. As an example, feasibility may include semi-ambulatory units. If there are concerns on how to meet the requirements, please email [arch@ohiohome.org](mailto:arch@ohiohome.org).

**Q The requirements for doorbells in sensory units are unclear. Does OHFA have more details on what is required?**

A Sensory units must meet the requirements as defined in Section 504 of the Architectural Barriers Act (ABA) Standards (2015) to serve persons with hearing or visual disabilities. User adjustable doorbell/strobe annunciators must be used to meet the audio/visual notification systems for entries requirement, and these systems are separate from the fire alarms. For user adjustable doorbell/strobe annunciators, OHFA uses the locations identified in the National Fire Alarm and Signaling Code (NFPA 72) for horn strobes.

**Q How should Section 504 units be identified in documentation submitted to OHFA?**

A All mobility, semi-ambulatory, and sensory units need to be consistently identified on overall floor plans, unit plans, DCF form, and AHFA. A best practice is to include a Unit Matrix on the cover sheet or accessibility plans.

**Q Is it acceptable to have all accessible units located in the same area of a development or buildings?**

A Distribution of units is defined on page 11 of the DAS and applicable to all accessible unit types.

- Providing accessible units in a variety of unit configurations and distributed throughout the development and buildings.
  - When units are on multiple floors, distribution includes units on multiple floors. The distribution neither precludes nor requires an accessible unit on all floors.

## H. Sustainability

**Q Why are ENERGY STAR® program requirements included with the NGBS green certification?**

A ENERGY STAR® Homes or ENERGY STAR® MFNC compliance verified by a HERS rater is required with ICC/ASHRAE 700 National Green Building Standard (NGBS). Silver Level certification or higher needs to have the energy efficiency requirements reasonably equivalent to the Leadership in Energy & Environmental Design (LEED) and Enterprise Green Communities (EGC) certifications as determined by OHFA.

**Q Does the current Green Globes certification qualify as a green certification that can be requested by exception?**

A Yes, Green Globes is an equivalent ANSI-approved rating system so this certification could be used through an exception request. The request must clearly articulate why the Green Globes certification is equivalent or better to any pre-approved certifications.

**Q Can you clarify the requirements for blower door testing on rehabilitation projects?**



- A *For Rehabs, the post-construction blower door test must achieve 12 ACH or better (e.g., 10 or 8 ACH). The referenced percentage in the DAS is not needed to determine if a rehab has met the blower door test.*

## I. Minimum Rehabilitation Requirements

**Q Is there a minimum cost for a Rehab?**

- A *Rehabs must meet the minimum cost per unit standard as set forth in any QAP or program guidelines. Costs per unit must reflect all items in the PCNA and SoW.*

### *Major Building Systems*

**Q Are items within a major building system (MBS) weighted when considering if 50% or more is being replaced? For example, are downspouts equivalent to windows for Thermal and Moisture Protection?**

- A *Items within a major building system are considered based on the impact those items have on a system. In the example provided, windows typically have a significantly higher impact on buildings than downspouts, and updates to downspouts alone would not be sufficient. Windows potentially would be enough based on how many are replaced.*

**Q I have a project with several buildings; some buildings have different major building systems that are in need of repair or replacement. How can a project meet the MBS requirements if not all buildings require 50% or more of these systems to be replaced?**

- A *If the needs of the buildings are different, some buildings may use a different system to meet MBS requirements. An example is a five-building project in which one building has a need for thermal envelope replacement and two others need HVACs replaced. Separately, these would not be sufficient to count as 50% or more being replaced; however, the composite of these could achieve an aggregate of 50% or more.*

**Q If a new amenity is added as part of the scope of a Rehab, does the amenity factor into the replacement requirements for the MBS?**

- A *Generally, no; however, if a new amenity is a substantial enough improvement that enhances the life, safety, and useability of a project, OHFA will consider if the amenity meets the goals of the MBS requirement. Some examples of substantial improvements may include a new community building, sprinkler system, or elevators. Adding only a small workout room would not be sufficient.*

### *Existing to Remain and Remaining Useful Life*

**Q We have a rehab that has mechanical systems that are used for community rooms, common areas, offices, etc., that are separate from the systems used for residents. Can the current systems be identified as Existing to Remain if they do not meet OHFA's energy efficiency requirements?**



A *No. The OHFA DAS is applicable to the entire project and all systems contained within the project boundaries and must meet the energy efficiency requirements of the DAS. An exception request may be submitted for systems that are in good condition or relatively new and do not serve as primary heating (water or HVAC).*

**Q I have building systems that have less than 50% Remaining Useful Life (RUL) and more than 10 years of RUL left. Do these still need replaced?**

A *In general, yes. The requirements outlined in the DAS are based on current wear and tear and the anticipated use remaining. However, it is recommended that any concerns on the RUL of a system be discussed with OHFA's architects prior to submitting an exception request.*

**Q If materials are 50% RUL, are they required to be replaced?**

A *No, materials and systems are not automatically required to be replaced. 50% Remaining Useful Life (RUL) is considered a threshold for replacement of materials that do not substantially meet the OHFA standards. 50% is the threshold where replacement is required to be addressed by the PCNA, but some materials are substantially more durable and can be documented as such.*

## K. Exterior and Site Requirements

**Q What areas are included in a project (e.g., community rooms, etc.)?**

A *OHFA uses the HUD definition of "project" in 24 CFR 8.3.*

[\*https://www.ecfr.gov/current/title-24/part-8/section-8.3#p-8.3\(Project\)\*](https://www.ecfr.gov/current/title-24/part-8/section-8.3#p-8.3(Project))

**Q We have storefront windows that are not ENERGY STAR® rated. How do we comply with OHFA's requirements on windows?**

A *OHFA recognizes that storefront windows are typically not ENERGY STAR® rated. To the extent possible, a design should strive to meet the standards used for an ENERGY STAR® rating. Any existing storefront windows must be in good condition with the frames intact and unbroken thermal seals. Increased energy efficiency could include adding thermal films, thermal blinds, storm windows, or other options.*

## 5. Main Entry

**Q For an accessible main entry, is the entire clear floor space (67" x 67") required to be covered?**

A *Yes, the entry cover must include the entire clear floor space at a minimum.*

## 7. Parking and Pathways

**Q Do the requirements in 7.2 regarding 5' minimum width sidewalks apply to new construction and rehabs?**



- A *It depends on the construction type. For rehabs, 7.2 of the DAS is only recommended, so an exception request is not required. New Construction/Adaptive Reuse must meet the requirements in 7.2 of the DAS.*

*This requirement is based on technical assistance from the Access Board for Model Sidewalks, and only applies to the Pedestrian Access Route, not all sidewalks on a property. More details are available in [Chapter 5 – Model Sidewalks of Planning and Design for Alterations](#).*

## L. Interior Requirements

- Q **Does the DAS identify OHFA requirements for delayed action closers for doors? What about hold opens for doors?**
- A *The DAS does not specify additional requirements for delayed action closers. OHFA follows the Fair Housing Act and Section 504 requirements for these. On doors that require a closer or if a closer is used, it must have a slow close feature (five seconds). A five-second delay (hold-open) is considered a best practice by OHFA and HUD.*

### 1. Durable Materials – Interior

- Q **Are rehab projects required to replace gypsum board and other wet areas with paperless gypsum board in bathrooms?**
- A *If non-deteriorated (i.e., without water damage or water stains), gypsum board (or other finished surfaces) may be retained in areas where the DAS specifies “paperless gypsum board.” The retained gypsum board (or other finished surfaces) must have a water barrier surface applied. A trowelable membrane is recommended if a tub/shower surround is removed that exposes existing surfaces. Where finish does not exist behind a tub/shower surround, gypsum board is not required to be added. All other aspects of DAS 1.5.5 apply.*

### 2. Building Systems

- Q **HVAC 2.2.5 (A) Access and Service is not clearly detailed on architectural drawings, so why is it a review item?**
- A *Furnace filters must be easily accessible and space must be provided that allows for the installation and removal of filters without causing damage (e.g., water heater placed in front of a furnace or door, door jambs installed after furnaces causing blocked filter access).*
- Q **Does a project need to have a HVAC system that is both ENERGY STAR® rated and meets the energy efficiency requirements of the green certification selected?**
- A *No, projects may meet either requirement, but based on green certification, selected projects will likely meet both of the requirements.*
- Q **What project types are allowed to use VTACs?**
- A *VTACs can be used on any project type.*
- Q **What project types are allowed to use PTHPs?**



A PTHPs can be used on rehab projects where the systems are already in place or in Affordable Assisted Living (AAL) projects. Rehabs that use PTHPs must be in existing PTAC openings in addition to meeting the requirements of 2.2.1. and 2.2.2. HVAC systems of the DAS. The following criteria must be met:

- Energy Efficiency Requirements: 14 SEER / 11.7 EER / 3.3 COP (heat mode)
- A PTHP may not have duct kits and may serve a single space or room only as temperature control is critical. Bi-directional through-wall thermostatic multispeed duct fans may be utilized.
  - AAL projects require an individual PTHP unit per habitable space (e.g., living room and bedroom).
- Units must pass ENERGY STAR® V3 testing and may not have open (i.e., non-closing) ducts to the exterior. HVAC units must be in a usable unmodified state during testing.
- Noise level STC 34 or less and 55 dBA or less
- Sleeve weather seals must be air-infiltration tight after units are replaced. This may require seal replacements with unit replacements.

An exception request is not required if the previous criteria are met for AAL or rehabs.

### 3. Common Areas

**Q Does OHFA's requirements on clean-out caps being within 12" of walls apply to rehabs?**

A No, but the caps must be designed for use in floors and flush with floors.

**Q Do I need to provide a floor drain in a unit's mechanical room and laundry area? Do I also need a floor drain in a common area laundry facility to minimize any damage if there is ever an equipment failure?**

A No; however, it is best practice to include floor drains in these areas.

### 7. Storage Space

**Q What is the intent of Equivalent Storage?**

A Equivalent storage allows all units to have appropriate and approximately equal storage. Appropriate storage must exist in all units and allow functionality in both kitchens and bathrooms.

For the National Kitchen + Bath Association's (NKBA's) recommendations for storage on accessible kitchens, visit <https://media.nkba.org/uploads/2022/05/Kitchen-Planning-Guidelines.pdf> and <https://media.nkba.org/uploads/2022/05/Bath-Planning-Guidelines.pdf>.

### 11. Kitchen & Appliances

**Q DAS 11.3 Kitchen Venting: Can you clarify what is needed for rehab projects?**

A Existing kitchen exhaust systems must be retained if they have a 6" minimum diameter duct, and ducted directly to the exterior. If the PCNA documents that the existing kitchen exhaust





duct is less than 6" or nonexistent, then recirculating hoods may be used without an exception request.

Ventilation to a rated shaft enclosure engineered system is excluded from this section of the DAS.

## 12. Laundry Facilities

- Q Are common area laundry facilities required if all units have owner-provided washers and dryers?**
- A No, OHFA properties must at minimum have either hookups in units or common area laundry facilities on site. Service enriched, assisted living, or zero-bedroom/efficiency (i.e., studio) units must have common area laundry facilities.

## N. Architectural Submission and Review Process

### Submission and Correspondence

- Q I have a large file to submit to OHFA for the architectural response. May I submit it via Dropbox™, Google Drive, OneDrive, etc.?**
- A No, large files must be submitted on OHFA's [File Transfer Site \(FTS\)](#).

All communications related to the architectural review, including notification of submission of architectural plans, must be sent to [arch@ohiohome.org](mailto:arch@ohiohome.org). State the project name as it appears in the AHFA/GFA and OHFA tracking number in the subject line, and carbon copy the OHFA architectural staff, and the OHFA Underwriting Analyst on the email. Architectural plans must be submitted with the project's application on [OHFA's File Transfer Site \(FTS\)](#). OHFA is not able to accept submissions through any of the following: external file transfer protocol (FTP) sites, Dropbox, Box, Google Drive, or OneDrive.

OHFA "architectural staff" members include the Architect and the Design Reviewer, and the Construction Project Specialist assigned to your project. These should be identified on the architectural response.

- Q What information is needed regarding condo structures during the application process? Is it looked at during the architectural review?**
- A The applicable QAP or program guidelines, requires that a description of the condominized space, and the architectural plans must identify any areas that are not part of OHFA's funding.

If any portion of the development will be condominized, the application must include a draft of the governing agreement that details costs and maintenance of common space, parking availability, air rights, default remedies, commercial uses, and tenant selection.

During the architectural review the condo description is reviewed to determine what portions of the project are included under OHFA's funding. The description must cover the aforementioned information noted in the program guidelines. It must also be clear in the description what percentages of space belong to each condo unit, which amenities, spaces or features are shared, and entities responsible for costs and maintenance of any shared areas. OHFA may request a draft copy of the condo legal document that the parties will enter into.



### *Preliminary Architectural Submission*

**Q How should a preliminary drawing set be submitted to OHFA?**

Preliminary drawings, described above, must be submitted in all of the following formats:

- Electronic format (pdf)
  - Single PDF file for all drawings specified above.
  - Separate PDF for specifications.
- Hard copy
  - Full set of architectural plans, 11"x17" scaled to fit. **Full-size architectural plans will be rejected.**

**A**

### *Final Architectural Submission*

**Q For the 80% drawing set, are paper 11" x 17" drawings required with the electronic submission?**

**A** *An 11" x 17" paper set shall only be required on 80% submissions with more than eight building types. All other projects can submit electronically.*

*The architectural PDF shall be combined into a single architecture file, including MEP, and a single specification file (not combined with drawing files). MEP can be submitted separately if the file is larger than 100 MB.*

**Q I'm preparing the 80% drawing set, what items are typically flagged by OHFA during the review?**

**A** *The following are commonly flagged:*

- |   |  |
|---|--|
| • Section 504 math                                | • Plumbing cleanout locations                                      |
| • A single Section 504 safe harbor selection      | • Bath storage   |
| • Shingles with a 30-year warranty                | • Bracing for wall-mounted sinks                                   |
| • Insulation R-values for roofs (sloped and flat) | • Flush handle locations   |
| • Window efficiency info.                         | • Sensory unit doorbell audio/visual notification system locations |
| • Appropriate dumpster access                     | • Outside corners of countertops radiused/eased                    |
| • Parking data (dimensions and signage)           | • Landing zones  |
| • Door closers                                    | • Equivalent storage (mobility units)                              |
| • HVAC efficiency                                 | • Microwave placement(equivalency/landing zones)                   |
| • Top- and front-load washers                     | • 34" high stove (mobility units)                                  |
| • ENERGY STAR® requirements for appliances        | • Secondary drains/trenches with roll-in showers                   |
| • Dimensioned plumbing plan                       |  |

*In addition to the aforementioned, the following apply to rehab projects:*





- Complete exception requests (See following FAQ.)
- Scope of work/PCNA/drawings coordination
- Electrical panel replacement/sizes
- Site features SoW
- Paving/SoW
- Accessory structures/SoW
- Insulation upgrades
- Sustainability issues
- Historic elements list/SoW
- All Mechanical systems inventoried

**Q Should both the unit schedule and floor plans identify the locations of mobility units and sensory units?**

**A** *Yes, and the information provided in the drawings must be consistent.*

**Q Does OHFA require the naming and numbering of units (typical / mobility / sensory) and buildings to be consistent on plans for all disciplines, such as civil, mechanical, and architectural?**

**A** *Yes, units and buildings must be labeled in a consistent manner throughout all documents (e.g. civil drawings, building plans, and enlarged units plans).*

## O. Exception Requests

**Q What is needed for an exception request to be considered complete?**

**A** *Each exception request must articulate unique issues and quantify why an exception is needed.*

*For rehabs or adaptative reuse projects, the documentation (e.g., drawings, financial analysis) provided must identify why meeting OHFA requirements is technically infeasible. Reasons are often focused on financial or structural infeasibilities but may include other considerations (e.g., terrain, historic features).*

*For other exceptions that include or exclude features based on the needs of the population(s), requests need to show substantial due diligence in clarifying why a requirement is not suited to the population(s), and typically, an alternative is to be provided.*

## DAS and Universal Design Alignment

**Q Do all Universal Design requirements apply to Rehabs?**

**A** *The following items do not apply to rehabs:*

- 36"-wide (minimum) entry door
- A 5' x 5' clear area is not required on rehab unit entries in general. However, this is required at accessible units, office entries, and site features.
- 42" minimum width for hallways
- 34"-wide (minimum) doors (However, 32"-minimum clearance does apply.)
- Extra electrical outlets (for medical equipment or rechargeable items, etc.)

*This does not alter any requirements for meeting accessibility.*



### *Interior Stairs and Hallways*

**Q Section L.5.1.1. Interior Doors of the DAS identifies 36” for interior door minimums, but Universal Design states a 34” minimum; what is the minimum standard?**

**A** *Interior doors must have a 32” clear opening width.*

### *Electrical*

**Q For bedrooms, are “extra electrical outlets” at 18”–24” above finished floor within the electrical requirements for Universal Design required on all projects?**

**A** *This requirement is meant to be focused on the height of outlets from the finished floor. The height must be met for all project types. The use of “extra electrical outlets” is only applicable to rehab or adaptive reuse projects that do not meet current electrical codes.*

### *Bathrooms*

**Q Is an adjustable-height or hand-held showerhead required in all bathrooms?**

**A** *Yes, either can be used. An articulated arm showerhead may be used, except in mobility units.*

### *Kitchen*

**Q DAS 11.4 & UD: For appliance-free counter spaces/landing zones, what are the minimum requirements? Can the minimum requirements be reduced or shared?**

*Kitchens in all units must have 12” wide by countertop depth landing zones that may be shared between appliances. Landing zones include both sides of stoves and kitchen sinks and the opening side of refrigerators.*

**Q Do I need 2” radii around outside corners for both kitchens and baths when Universal Design states only bathrooms?**

**A** *No, 2” radii are not required in kitchens or baths. However, a radius is required for bathrooms. For kitchens or baths, OHFA recommends an eased edge or countertop radii of  $\frac{3}{4}$ ” with larger radii as appropriate for the countertop materials used.*