



January 1, 2025

To: All Interested Parties

From: Ohio Housing Finance Agency

Re: Frequently Asked Questions Effective January 1, 2025 for Design and Architectural Standards

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## **FAQ Background**

The following were requests received regarding the current Design and Architectural Standards (DAS). Questions were edited for style, removal of identifying details, and similar questions were combined. The answers posted herein aim to clarify and will be considered for modifying the DAS during calendar year 2025. Questions are organized by the applicable DAS sections.

### **F. Adaptability & Accessibility**

**Q We are considering a renovation that does not appear to have an accessible path to 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 with OHFA. If there are concerns on how to meet the requirements, please contact [Arch@ohiohome.org](mailto:Arch@ohiohome.org).*

**Q What must be included for 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 Are all housing types required to comply with OHFA's 504 requirements? Can projects with certain populations request an exception to use different requirements to meet the second 5% rounded up?**

A *All housing types must comply with OHFA's 504 requirements. However, OHFA will consider exception requests based on the population(s) being served for the second 5% rounded up. Such requests must include features of accessibility that are suited to the population(s).*

**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 and Architectural Barriers Act (ABA) Standards (2015) to serve persons with hearing or visual disabilities. User adjustable doorbell/strobe annunciators must meet the audio/visual notification systems for entries requirements. These systems are separate from the fire alarm system. For user adjustable doorbell/strobe annunciators, OHFA uses the locations identified in the National Fire Alarm and Signaling Code (NFPA 72) for horn strobes.*

## **H. Sustainability**

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

A *Some of the pathways in ICC/ASHRAE 700 National Green Building Standard (NGBS) Silver Level Certification or higher do not equivalent energy efficiency requirements to the LEED and EGC certifications. Use of ENERGY STAR® Homes or ENERGY STAR® MFNC compliance that is verified by a HERS rater was determined by OHFA to better align the energy efficiency requirements for this standard with the other pre-approved certifications.*

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

A *For rehabilitation projects, the post-construction blower door test must achieve 12 ACH or better (e.g., 10 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 Are items within a major building system (MBS) weighted when considering if 50% or more items are being replaced? For example, are downspouts, siding, windows, doors, and roofs all equivalent for Thermal and Moisture Protection?**

A *Items within a major building system are considered based on the impact the items have on a system. OHFA considers a variety of factors for impact, such as improvements to energy efficiency, durability of materials, resident quality of life, budget for the items, etc. In the*

*example provided, windows and roofs typically have a significantly higher impact on buildings than downspouts or doors.*

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

*A If the needs within a group of buildings are different, some buildings may use a different system to meet the MBS requirements. An example is a five-building project in which one building has a need for a 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 this factor into the replacement requirements for the MBS?**

*A Generally, no; however, if a new amenity is a substantial improvement and 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.*

**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 boundary must meet the requirements of the DAS.*

**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. However, any concerns on the RUL of a system can be discussed with OHFA's architects. The requirements outlined in the DAS are based on current wear and tear and the anticipated use remaining.*

## **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 a project.*

**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.*

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

*A OHFA recognizes that storefront windows are typically not ENERGY STAR® rated; however, improvements must be part of the design. To be approved, a design should strive to meet the standards used for the ENERGY STAR® rating. Any existing storefront windows must be in good condition with the frames intact and the thermal seals unbroken.*

## **L. Interior Requirements**

**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. Based on green certification, selected projects will likely meet both of the requirements.*

**Q What project types are allowed to use VTAC or PTHP?**

*PTHP can be used on Assisted Living projects and rehab projects where these systems are already in place. VTHPs are allowed on all housing types. VTAC and PTAC that are not heat pumps are not permitted.*

**Q Does OHFA’s requirements on floor drains and clean-out caps being within 12” of walls apply to rehabs?**

*A No, but the caps must be designed for use in 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 a best practice to include floor drains in these areas.*

**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 0-bedroom/efficiency (i.e., studio) units must have common area laundry facilities.*

**Q Do the DAS identify OHFA requirements for delayed action closers for doors? What about hold open?**

A *The DAS do not specify additional requirements for delayed action closers. OHFA follows the requirements that are in Fair Housing and Section 504. On doors that require a closer or if a closer is used, it must have the delay and slow close feature (5 seconds / 5 seconds). Hold-open features are only considered a best practice.*

## **N. Architectural Submission and Review Process**

**Q What definition does OHFA use for “detrimental land use”?**

A *OHFA uses Section 3767.41 | Buildings found to be public nuisances of the Ohio Revised Code.*

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

A *Yes, all units and buildings must be labeled in a consistent manner throughout all documents. This is especially important for accessible unit types as they need coordinated on the site plan, civil drawings, building plans, and enlarged unit plans. Using addresses is one way to achieve this coordination.*

**Q I have a large file to submit to OHFA for the architectural response. May I submit them via Dropbox™, Google Drive, OneDrive, etc.?**

A *No, any large files must be submitted on OHFA’s [File Transfer Site \(FTS\)](#). Once a file is uploaded, a notification email should be sent to [Arch@ohiohome.org](mailto:Arch@ohiohome.org), and the OHFA construction project specialist and the OHFA architect assigned to the project.*

**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 infeasibility but can 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.*

**Q What is the purpose of the Scope of Work form with New Construction projects?**

A *All projects may experience changes from the application through construction. The Scope of Work form provides baseline costs at application as well as later at 8609. Additionally, the form provides hard data that can aid in the development of or changes to requirements in the Design and Architectural Standards.*

Q **Should both the unit schedule and site plan identify to locations of Mobility Units and Sensory Units?**

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

## **DAS and Universal Design Alignment**

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

A *Yes, but it can be an articulated arm showerhead in non-accessible units.*

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 *36”- entry doors and 34”-interior doors are required.*

Q **Section L.11.4. Kitchen & Appliances of the DAS identifies 12” x 15” appliance-free counter spaces, but Universal Design states at least a 15”-clear space/landing zone, what is OHFA’s minimum standard?**

A *Clear space for appliances must be a minimum of 12” x 15”, but a best practice is 15” wide.*

Q **Do I need a 2" radius around outside corners for both kitchens and baths when Universal Design lists only bathrooms? Does this also apply to common areas?**

A *DAS only has specifications for outside corners for residents’ and common area bathrooms. With kitchens, a best practice is to apply the same specifications used with bathroom counters to the counters in this area.*

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

A *This requirement is meant to be focused on the height of outlets from the finished floor. All project types must meet the 18”-24” above finished floor requirement in bedrooms. The use of “extra electrical outlets” is only applicable to rehab or adaptive reuse projects that do not meet current electrical codes.*