



July 30, 2026

Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

RE: 9% LIHTC Qualified Allocation Plan 2027 Technical Amendments Draft 1

To Whom It May Concern,

Thank you for the opportunity to provide written comments on the 2027 Technical Amendment Draft QAP for 9% LIHTC. First, we would like to take the opportunity to thank OHFA for the removal of the required hard copy set of Architectural Plans. The time and cost savings will not go unnoticed. Second, we would like to provide feedback on three sections of the QAP for your consideration.

1. Within-Region Allocation: Metro vs. Rural & Regional Award Sequence

Can OHFA clarify how the award sequence works when a region's Rural suballocation is sufficient to fund more than one project? Will OHFA fund both Rural projects first, using the funding sequence tables on QAP page 36 to determine the appropriate funding pool for the second Rural award, or will OHFA determine the appropriate funding pool for a hypothetical second Rural award based on a funding sequence that ranks Rural projects with Metro projects from the same region and funds in order of score?

2. Census Tract Limiter

Language has been adjusted to read "Further, to increase geographic distribution, census tracts will be limited to one award per QAP." Is it OHFA's intention to allow one award per program (e.g. one in 9% LIHTC, one in 4% with BGF, one in 4% OLIHTC) in the same census tract? If so, this sentence may benefit from some additional clarification given OHFA's typical naming convention for 4% OLIHTC and BGF programs is to call the document "Guidelines" rather than "QAP".

Furthermore, language in this section states "Census tracts that received a 9% LIHTC award for Preserved Affordability in 2026, are eligible to receive an additional award in 2027." Can OHFA clarify whether the additional award allows for Preserved Affordability or New Affordability.

3. Preserved Affordability

We would like to respectfully request that OHFA consider reinstating the USDA Subsidy Preservation set-aside in the 2027 Technical Amendment. OHFA's current scoring framework is highly location-based, prioritizing areas of housing need and areas of opportunity. While this approach advances important policy objectives, it may not fully align with the characteristics of USDA Rural Development (RD) properties, which are often located in smaller or more rural markets and therefore may be less competitive under these criteria. OHFA was able to fund three HUD Subsidy Preservation projects in the 2026 competitive round, but no USDA Rural Development (RD) subsidized properties since they are geographically disadvantaged in scoring given their programmatic purpose.





Thank you for your time and for your continued partnership.

Sincerely,



Claire Reinstein
Senior Development Manager
Fairfield Homes, Inc.

