



July 23, 2026

Bill Beagle, Executive Director
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, Ohio 43231

Re: Comments on the Draft Technical Amendments to the 2027 Qualified Allocation Plan

Dear Mr. Beagle:

On behalf of Homeport, I'm writing to provide comments on the draft technical amendments to the 2027 Qualified Allocation Plan (QAP). Thank you for the hard work by OHFA's staff to create the QAP and for providing the opportunity to submit comments on the draft. These comments are generally presented in the order they appear in the QAP:

CHDO-Sponsored Projects

Please clarify if OHFA's published guidelines for Community Housing Development Organizations (CHDO) still apply. The 2026 guidelines say that in order for a nonprofit organization to qualify as a CHDO, it or its subsidiary must be the development's sole general partner or managing member. However, the "Proposal Summary" for one of the projects approved by OHFA in the 2026 9% LIHTC application round identifies a second general partner that isn't a CHDO.

OHFA should use this set-aside only for proposals and development teams that meet OHFA's guidelines for CHDOs.

Statewide Redistribution of Unused Regional Credits

There appears to be a typo on p.36 in the final bullet point of Section 7(b). The sentence is missing the number for where to provide supporting documents.

County Limits and Census Tract Limiter

We suggest that census tracts that received in 2026 a 9% LIHTC award for Preserved Affordability not be allowed to receive an additional award in 2027 for preservation proposals. This change could further increase geographic distribution in the 2027 application round.

Preserved Affordability

First, thank you for continuing to reserve half of this pool's funding for properties originally financed by LIHTC and without project-based subsidy. We support OHFA's policy choice to recognize that there are many properties developed at some point in Ohio between 1986 and 2010 that fit in this category and are in need of renovation and recapitalization.

While we realize the 2027 QAP focused on technical amendments, we want to look ahead to the 2028-29 QAP and suggest additional scoring categories for this pool. The "Neighborhood Opportunities Index" and "Housing Needs Index" consider present-day conditions. Every



developer proposing applications in this pool starts with site-selection decisions that were made more than 15 years ago. We suggest two ideas:

1. Move the “Oldest LIHTC Award” criterion from a tiebreaker to a scoring metric, as OHFA has done in recent “Bond Gap Financing” application rounds. We think that a property within five years of the expiration of its 30-year affordability covenant has a more pressing need for preservation and renovation than a property between years 16 and 25 of its covenant. These more recently built properties have time to plan for their recapitalization and should have less urgent physical needs.
2. Add the “Discount to Market Rent” metric to the scoring criteria, as OHFA has used in recent application rounds. This metric has seemed like a useful tool to determine which properties are more likely to convert to market-rate rents, leading to tenants’ probably displacement, when their affordability covenant expires. The metric can help guide OHFA’s decisions about which properties should preserve their affordability.

Thank you for considering these comments, and I’m glad to discuss them with any of OHFA’s staff as you like.

Sincerely,
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