
2027 9% - First Draft QAP Comment

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To QAP, OHFA <QAP@ohiohome.org>

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Section F of the draft QAP ("County Limits and Census Tract Limiter," p. 36) limits census tracts to one 9% LIHTC award per QAP round, with only a narrow, single-year exception for tracts that received a Preserved Affordability award in the prior program year. This rule should be amended so that a Preserved Affordability award and a New Affordability award (General Occupancy, Senior, or Tenant Populations with Special Housing Needs) can be funded in the same census tract within the same QAP round.

A preservation project's location is not a choice made to capture a competitive advantage — it is fixed by the address of an existing, already-affordable property with an expiring Section 8 HAP contract, expiring LIHTC compliance period, or similar at-risk federal or local subsidy. The development team cannot relocate that property to a less-competitive tract, and declining to preserve it does not free up the tract for a different developer's new construction; it simply risks losing the existing affordable units altogether. As currently written, the QAP treats a Preservation award as if it were interchangeable with a New Affordability award for purposes of the one-award-per-tract limit. In practice, this means a developer who identifies both an at-risk affordable property in need of preservation and a genuine, separate opportunity for new construction in the same neighborhood — exactly the kind of paired investment that reinforces a community rather than displacing it — must choose one or the other, or wait an additional program year and hope the second opportunity, and its site control, survives that long.

The QAP already recognizes that Preservation projects shouldn't be measured by the same geographic-distribution yardstick as new construction: County Limits "only apply to New Affordability – General Occupancy and New Affordability – Senior projects," and CHDO-Sponsor projects are excluded from the County Limit outright. The Census Tract Limiter should follow the same structure. OHFA has also already implicitly endorsed pairing a Preservation award with a subsequent award in the same tract, since a tract that received a 2026 Preservation award is made eligible for an additional 2027 award — the requested change simply allows that same pairing to occur within a single QAP round, rather than forcing a developer to split it across two rounds and two competitive cycles.

Suggested Language:

"Further, to increase geographic distribution, census tracts will be limited to one award per QAP for New Affordability – General Occupancy, New Affordability – Senior, and Tenant Populations with Special Housing Needs projects, combined. A Preserved Affordability award does not count toward, and is not limited by, a census tract's award limit. A census tract that receives a Preserved Affordability award in a given QAP round remains eligible to also receive one New Affordability – General Occupancy, New Affordability – Senior, or Tenant Populations with Special Housing Needs award within that same round. Census tracts that received a 9% LIHTC award for Preserved Affordability in 2026, are eligible to receive an additional award in 2027. The remaining 20 census tracts that received a 2026 9% LIHTC award are ineligible to receive an award in 2027, unless it is awarded under the Community Impact Strategic Initiative or is a Preserved Affordability award."

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