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Cody Price
9% Tax Credit Section Chief
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

RE: 9% LIHTC Qualified Allocation Plan Program Years 2026-2027 - 2027 Technical Amendments

Dear Dr. Price,

On behalf of our organization, along with the communities we serve, The Community Builders (TCB) offers these comments in response to OHFA's published draft 2027 Technical Amendments to the 2026-27 QAP for 9% Low Income Housing Tax Credits. TCB appreciates OHFA's goals to evolve its policies to help meet Ohio's housing needs. As in prior years, TCB appreciates Section Chief Price's transparency on the drafting process and intent, as well as his willingness to consider adjustments to the draft to get to the best possible policy instrument and housing outcomes.

County Limits and Census Tract Limiter. TCB strongly supports the technical amendment's revision to exempt Community Impact Strategic Initiative projects from both County Limits and Census Tract Limiters. This exemption acknowledges that there are worthwhile Community Impact Strategic Initiative applicants throughout the state whose ability to compete for credits would be unjustly removed due to the imposition of geographic limits. The 2026 9% LIHTC round illustrated that geographic determinants disproportionately advantaged rural counties, and disadvantaged urban counties, without regard to the magnitude of impact made by the project itself. Therefore, removing geographic limits enables OHFA to select the project that demonstrates the greatest benefit to those in need.

Community Impact Strategic Initiatives: TCB encourages OHFA to increase the number of projects awarded via the Community Impact Strategic Initiative set aside each round. Given that this set-aside is statewide rather than regional, the competition for these funds is great. Additionally, unlike those projects competing within the regional pools, the Community Impact Strategic Initiative projects are required to submit proof of local municipal support, therefore these projects are the best indicators of where local governments see the greatest need for affordable housing in their communities. In many cases, local governments have limited financial resources to allocate to affordable housing, and therefore, providing their support within funding applications is their primary means of showing funding institutions such as OHFA where affordable housing need is most critical and where funders would have the biggest impact. Therefore, we recommend awarding more than one Community Impact Strategic Initiative project in each funding round.

Concerted Community Revitalization Plan: Currently, projects awarded from the regional pool are allowed to count towards meeting the Concerted Community Revitalization Plan set aside. The result for

the 2026 9% round was that separate awards were not provided for this set aside, as projects already awarded in the regional pool distribution were deemed to meet the criteria for this set aside. Further, the QAP's opportunity scoring methodology is likely to direct these set aside awards to neighborhoods where positive transformation is already well underway and does not require further intervention. We encourage OHFA to establish alternative scoring criteria for the Concerted Community Revitalization Plan set aside, to target neighborhoods where revitalization efforts are still in coming together, and transformation efforts are in an early stage. Possible alternative selection criteria for community revitalization could include:

- Leveraging of scarce public and philanthropic resources: Community revitalization plans that are accompanied by significant matching investments from non-OHFA sources are an indication of a plan that is likely to succeed. We encourage OHFA to being awarding points for proposals that include significant matching funding commitments.

- Commitment of signature funding resources: Proposals that have received signature state or federal funding commitments (for instance, the HUD Choice Neighborhoods Implementation Program), with defined neighborhood transformation objectives.

The above recommendations would likely necessitate a change to credit distribution. Currently, the statewide set asides are funded with "unused regional credits" from the geographic pool awarding sequence. That means the Community Impact Strategic Initiative and Concerted Community Revitalization Plan set asides do not have a fixed allocation that can be relied upon by developers who are weighing whether to submit an application. We recommend that OHFA choose a fixed percent of the annual 9% credit ceiling that goes towards the statewide set asides, to provide greater certainty to those applying.

OHFA has a stated vision of "an Ohio where everyone has a safe, decent, and affordable place to call home." TCB values its longstanding partnership with OHFA and remain committed to working collaboratively to ensure the QAP supports the production and preservation of affordable housing across Ohio. Thank you for your consideration of these comments. We welcome further discussion as the QAP Technical Amendment is finalized.

Sincerely,

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George Tabit

Senior Vice President of Housing
 The Community Builders, Inc.