January 23, 2026

To: Interested Parties
From: Ohio Housing Finance Agency (OHFA)
Re: 2026-2027 9% LIHTC QAP - Frequently Asked Questions (FAQ)

The following is a summary of questions OHFA received regarding the 2026-2027 9% LIHTC Qualified Allocation Plan (QAP) guidelines (the "Guidelines"). Questions were edited for style, to remove identifying details, and combined with similar questions from various individuals. The answers posted herein clarify and modify the Guidelines and will be considered during the program round. In accordance with the 2026 Program Calendar found on page 8 of the Guidelines, OHFA accepted questions regarding the 2026 9% LIHTC round until Friday, January 9, 2026, by 5:00 p.m. EST.

Application Limits

Q: Given the changes to experience and capacity this year (with OHFA adding a new separate process that now created the concept of Mentor Developers and Co-Developers) is it correct to assume that a Developer whose experience has been approved by OHFA under MQ3 or MQ4 could potentially be listed on more than one application that receives a 9% LIHTC reservation in the upcoming round so long as: 1) the Developer approved under MQ3/MQ4 was listed as the lead developer on only the first application that receives a reservation and 2) only as Co-Developer on any subsequent applications that receive reservations with a Mentor Developer (approved under MQ6) acting as lead developer?

A: No, entities must still comply with the application limits outlined on page 27 of the Guidelines. For example, if an entity is approved as MQ3, this entity is then limited to one annual LIHTC reservation. If this entity is part of a development team, either in a lead developer or co-developer role, the entity is still limited to one annual LIHTC reservation.

Application Limits

	Maximum Proposal Application Submissions	Maximum Application Reservations
Development Teams meeting OHFA's Experience and Capacity Minimum Requirements and has successfully placed at least three LIHTC projects in service, as evidenced by IRS Form 8609, **in Ohio within the last 10 years** as of the date of the Proposal Application deadline indicated in the Program Calendar.	4	2
Development Teams meeting OHFA's Experience and Capacity Minimum Requirements and has successfully placed at least one LIHTC project in service, as evidenced by IRS Form 8609, in **Ohio within the last 10 years** as of the date of the Proposal Application indicated in the Program Calendar.	3	1
Development Teams meeting OHFA's Experience and Capacity Minimum Requirements and has successfully placed at least one LIHTC project in service, as evidenced by IRS Form 8609, in **another state within the last 10 years** as of the date of the Proposal Application deadline indicated in the Program Calendar.	2	1

Q: In the event that a developer has multiple application submissions in different regions or pools that are in line to receive a reservation but the Developer is capped on their number of reservations which project is awarded by OHFA and which one(s) are subject to the cap? Does OHFA leave it up to the developer to choose which project they wish to receive an award? Is there a different process?

A: OHFA will cap entities based on the award sequence outlined in the Guidelines. For example, if the entity has the highest scoring new affordability projects in Southeast and Northeast, but is limited to one LIHTC reservation, it would receive the Southeast reservation as it is funded first in the award sequence.

Q: Just want to clarify that county limits do not apply to Preserved Affordability (PA), Tenant Populations with Special Housing Needs (TPSHN), the Community Impact Strategic Initiative (CISI), or Community Housing Development Organization (CHDO) set asides.

A: County caps only apply to new affordability projects funded in step 4 and beyond. Thus, CHDO, TPSHN, and PA are excluded.

reallocated to the regional distribution.

4. **Statewide Regional Allocation by Population**

   After the above projects are awarded, which do not count toward a region's base allocation or county cap, OHFA will calculate the remaining credit ceiling available for regional distribution. These resources will be used to fund the New Affordability – General Occupancy and New Affordability – Senior projects.

   The regional allocation calculation will use the most recent 5-year American Community Survey (ACS) data, as of OHFA Board's approval of the QAP, to determine each county's share of Ohio's total population.

   Counties will then be grouped into the five regions: Central, Northeast, Northwest, Southeast, and Southwest, as defined by **Ohio Department of Development, TourismOhio**, with each county classified as either Metropolitan (M) or Rural (R) as defined in **R.C. §122.23**.

PY 2026-2027 9% LIHTC QAP 30

reducing our forward allocation each year by awarding less than 100% of our credit ceiling.

County Limits and Census Tract Limiter

OHFA will limit the number of awards in each county based on the higher of the most recent 5-year American Community Survey (ACS) county population data or the Projected 2050 County Populations as determined by the **Ohio Department of Development's Office of Research**, adjusted for the number of projects receiving a Conditional Qualification Letter (CQL) in the prior 9% LIHTC round.

County limits only apply to New Affordability – General Occupancy and New Affordability – Senior projects. Projects funded through the CHDO-Sponsor set aside are excluded and do not count toward the county limit.

County Limits:

- Four: Franklin
- Three: Cuyahoga
- Two: Hamilton
- One: All other counties

Further, to increase geographic distribution, census tracts will be limited to one award per program year.

Q: Can an applicant submit both a New Affordability – General Occupancy and New Affordability – Senior project for the same site?

A: Yes. If an applicant is eligible to submit two applications, these applications can be used for the same site as only one may be funded given the census tract limiter. However, the applicant would be responsible for meeting and submitting all funding pool threshold and submission requirements in each separate and unique application. This would include a unique market study demonstrating the market need for the population served.

Award Sequence

Q: Page 34 of the Guidelines provides an option for OHFA to give “priority consideration” in the Southeast Region to projects in counties that have received fewer LIHTC awards over the past five program years. The intent, as stated, “ensures that all parts of the region have access to development opportunities while maintaining a competitive scoring framework”.

Within the Southeast Region, the highest scoring census tracts are in Washington County. However, Washington County has not had any new construction LIHTC developments in the past five program years and has consistently struggled to compete for new construction resources under previous competitive scoring frameworks.

How does OHFA intend to apply this “priority consideration” option when evaluating rural new construction applications in the Southeast Region?

Is it OHFA’s intention that Washington County would not receive priority consideration for a new construction 9% allocation due to the recent 4% award for the rehabilitation of existing LIHTC units?

Given that other rural regions do not apply past awards until the tiebreaker stage, can OHFA clarify how the Southeast Region’s unique approach aligns with the statewide goal of equitable access to development opportunities?

As written, the treatment of the Southeast Region appears inconsistent with the approach used in all other rural regions.

A: The intent of the Southeast Region priority consideration is to provide OHFA with flexibility, if needed, to address a geographic concentration of awards in counties within the region while still preserving the integrity of the competitive scoring framework. It does not create an automatic preference or exclusion based solely on prior awards, nor is it intended to function as a threshold eligibility requirement.

When evaluating rural new construction applications in the Southeast Region, OHFA will first rank projects based on total competitive score in accordance with the Guidelines. OHFA may apply the priority consideration option to distinguish between similar competitive applications to ensure a geographic distribution within the region.

In Washington County, a recent 4% LIHTC rehabilitation award does not, in and of itself, preclude a new construction 9% application from being considered for priority consideration. However, past awards—both new construction and rehabilitation—may be reviewed in the context of overall regional distribution when exercising this discretionary option.

OHFA developed this approach to address the unique market dynamics and historic award patterns in the Southeast region. Unlike other rural regions where past awards are applied only at the tie-breaker stage, this provision allows OHFA to address what it sees as a longstanding geographic imbalance within the Southeast Region earlier in the evaluation process, if necessary, while still awarding credits based on competitive merit.

OHFA intends for this provision to serve as a narrow tool to support equitable regional access where scores are otherwise closely aligned.

Q: Regarding #6 Regional Award Sequence, Step 1 says the 1st award will be Rural. Step 2 says the 2nd award will be the opposite funding pool, but it doesn't mention anything about geography and neither does the funding sequence chart for subsequent awards.

Does this mean that only the 1st award in each geography will be Rural? Or, can any of the subsequent awards also be Rural, so long as they are the next highest scoring?

A: It depends on the region. After Step 4 (regional distribution), Step 5 allocates credits within the region between Metro and Rural counties based on population percentages. This breakdown determines eligibility for Project 2, since the first deal will automatically be rural.

For example, if a region can fund two deals and its population is 55% Metro/45% Rural, Step 6 requires the first deal to be Rural. That award would satisfy the rural portion, so the second award would then go to a Metro project.

If the region can support more than two deals, the subsequent projects depend on the metro/rural split and whether the region can justify multiple rural awards. The overall goal is to maintain the region’s population percentage split across the awards.

Q: Can you provide the breakdown of each region's Metro/Rural split?

A: For the 2026 round, OHFA will use the 2023 ACS 5-year Estimates, outlined below, for the Regional Distribution and Metro/Rural splits for each of the regions.

	Sum of Population	Percent
Central	**2,262,608**	**19.21%**
Metro	2,099,361	92.79%
Rural	163,247	7.21%
Northeast	**4,311,826**	**36.60%**
Metro	3,576,337	82.94%
Rural	735,489	17.06%
Northwest	**1,482,013**	**12.58%**
Metro	602,977	40.69%
Rural	879,036	59.31%
Southeast	**783,786**	**6.65%**
Rural	783,786	100.00%
Southwest	**2,939,813**	**24.96%**
Metro	2,623,067	89.23%
Rural	316,746	10.77%
Grand Total	**11,780,046**	**100.00%**

Q: What percent of the LIHTC ceiling is allocated to the Preserved Affordability funding pool? When are these projects funded?

A: The Preserved Affordability Pool is 13% of the total annual credit ceiling as stated on page 40 of the Guidelines. The table below highlights the predicted award sequence outlined in the Guidelines.

Preserved Affordability

Allocation Targets and Definitions

Allocation Goal: 13% of the total annual credit ceiling

Developments in which the majority of units preserve existing affordability by maintaining project-based rental assistance, project-based operating subsidies, and/or LIHTC can participate in this pool.

Projects located in a program year Qualified Census Tract and include more than 70 total units are ineligible to compete in the 9% LIHTC round unless the development team can demonstrate project infeasibility with the 4% LIHTC program.

To seek an exception, the development team must provide a clear and data-supported narrative and documentation that substantiates why the proposed project cannot proceed using 4% LIHTC with tax-exempt bonds. The explanation should convincingly outline financial, market, and structural limitations such as identifying a funding gap that cannot be reasonably bridged with 4% LIHTC only. These exceptions must be received to OHFA via **QAP@ohiohome.org** no more than 60 days prior to the Proposal Application deadline as noted in the program calendar. Projects that do not receive approval from OHFA at least 30 days prior to the Proposal Application deadline will not be permitted to submit a Proposal Application.

	Set Aside/Subpool	Funding Pool	Region	Metropolitan or Rural	% of LIHTC Ceiling
Project 1	CHDO Sponsor		N/A	N/A	
Project 2	CHDO Sponsor		N/A	N/A	
Project 3	CoC Referral #1	TPSHN	N/A	N/A	~22%
Project 4	CoC Referral #2	TPSHN	N/A	N/A	
Project 5	Non-CoC Referral	TPSHN	N/A	N/A	
Project 6	Balance of State	TPSHN	N/A	N/A	
Project 7, 9	Rental Assistance	PA	N/A	N/A	~13%
Project 8	LIHTC Resyn.	PA	N/A	N/A	
Project 10	N/A	New Aff.	Southeast	Rural	~65%
Project 11-12	N/A	New Aff.	Northwest	Rural and ?	
Project 13-15	N/A	New Aff.	Central	Rural and ??	
Project 16-18	N/A	New Aff.	Southwest	Rural and ??	
Project 19-22	N/A	New Aff.	Northeast	Rural and ???	
Project 23	Strategic Initiative				

Q: The two highest-scoring CHDO projects will be funded, per page 29 of the Guidelines, subject to one per region and one per "funding pool". For this purpose, is New Affordability a single funding pool or are General Occupancy and Senior separate pools? Am thinking it's the latter, but please confirm.

A: They are separate funding pools. In total, there are four funding pools: New Affordability - General Occupancy; New Affordability - Senior; Preserved Affordability; and Tenant Populations with Special Housing Needs.

Q: Similar to the CHDO set asides, do the Qualified Census Tract (QCT) Projects have to be in different Regions and funding pools from each other?

A: No, QCT projects can include any project that was previously funded in an earlier award sequence. If no project(s) meeting this set-aside are awarded in Steps 1–6, then priority will be given to new affordability projects located in a QCT with a concerted community revitalization plan. These would be considered as part of the remaining statewide redistribution of unused regional credits. No regional cap will be applied.

7. Statewide Redistribution of Unused Regional Credits

If a region cannot fully fund the next eligible project, these remaining credits will "roll up" to a statewide pool. OHFA will use this pool to meet the following priorities:

a. *QCT with Concerted Community Revitalization Plan (two projects)*

If two projects located in a Qualified Census Tract with Concerted Community Revitalization Plan are not funded through the prior award sequence, OHFA will give priority to funding such projects during the redistribution of remaining regional credits. To qualify:

- Projects must be located in a program year qualified census tract (QCT) (as defined in subsection (d)(5)(b)(ii)) and the development of which contributes to a concerted community revitalization plan as referenced in 26 U.S.C. §42(m)(1)(B)(III). The applicant must supply the community revitalization plan and demonstrate how the project contributes to the community revitalization plan, including a description of project's proposed impact on the community. The applicant must also submit a local support letter from the local municipal corporation and township in which the project is proposed to be constructed, detailing how this the development supports the local community revitalization plan.
- Please note: The AHFA will automatically determine whether the project is located in a QCT for the year in which the application is being submitted. To demonstrate that the project contributes to a concerted community revitalization plan, the plan must meet the standards outlined in Concerted Community Revitalization Plan in Appendix A. Applicants must include a copy of such plan in the 8. Competitive Support Documents folder with specific threshold items highlighted and other documentation highlighted above.

b. *Community Impact Strategic Initiatives (at least one project)*

Q: Within the Special Housing Needs Funding Pool, will all awards be distributed to different regions? Or is that rule specific to the CoC Set asides. For example, if a project is funded in the NE Region under the CoC Set aside, can a NE project be funded by the Non-CoC set aside?

A: It is dependent on the set aside. For the two highest scoring CoC referral partnerships, it is one per region. For the other set asides and remaining funds, it is the highest scoring project with no regional cap.

2. Tenant Populations with Special Housing Needs Set Asides

a. *CoC Referral Partnership (two highest scoring eligible projects; max one per region)*

OHFA will reserve resources for the two highest scoring projects that serve target populations at or below 30% AMI with a disability, as identified and outlined in the **Ohio Interagency Council on Homelessness and Affordable Housing Permanent Supportive Housing Policy Framework** and meet the prioritization factors set forth in Section II.B.3 of HUD Coordinated Entry Notice CPD-17-01.

Further, to be eligible for this set aside, the project must meet the following:

- At least 50% of total units must target the populations outlined in the PSH Policy Framework.
- 100% of the total units serving the target population must have a firm commitment for project-based rental subsidy or rental assistance, excluding HUD 811 PRA.
- Has a referral partnership with the applicable local Continuum of Care (CoC).
- Must maintain eligibility with other funding pool requirements.

b. *Non-CoC Referral Partnership (the highest scoring eligible project)*

OHFA will reserve resources for the highest-scoring project that serves populations with a referral partnership **outside** of the local Continuum of Care and falls within the funding pool's list of eligible target populations.

- For projects specifically targeting people with a disability, the maximum number of units that can be set aside for the population is 25% of the total project units.

c. *Balance of State (the highest scoring eligible project)*

OHFA will reserve resources for the highest-scoring project in a county other than Cuyahoga, Franklin, Hamilton, Montgomery, or Summit serving a Tenant Population with Special Housing Needs and meets the funding pool definition and threshold requirements.

d. *OHFA will reserve resources for the next highest scoring project that can be fully funded within the funding pool allocation. If there are remaining resources that cannot be used to fully fund a Tenant Populations with Special Housing Needs project, then these resources will be reallocated to the regional distribution.*

Experience & Capacity

Q: Since the Guidelines says that "While the LIHTC Ownership Entity may be noted as “To Be Determined” or “To Be Formed”, developer, co-developer, and general partner/managing member parent entities must be disclosed" and also that "Each entity of the Development Team must submit its approval letter on OHFA letterhead with the Proposal Application", I wanted to confirm what to do specifically about the GP/MM Experience and Capacity since that's technically an entity too.

For any application we submit in the 9% round, the GP/MM has not yet been formed, and when it is, it will be a single-purpose entity just like the LIHTC Ownership Entity. So I want to confirm 1) whether or not we need to submit an Experience and Capacity package for the not-yet-formed single purpose entity GP/MM and if so 2) how that will be viewed since it hasn't been formed and thus has no "experience".

A: No, per the 2026 Experience and Capacity Standards – Frequently Asked Questions, GP/MM entities do not submit an Experience & Capacity (E&C) workbook as they are not approved through the E&C review process. The parent entity of the GP/MM is evaluated at project application, not during E&C review. Materials must be submitted under the project application's Development Team E&C Review submission item. Please see the E&C FAQ document for further details.

Q: Since we must disclose the management company in the AHFA, do we also need to include the management company's E&C approval?

A: No, E&C approval is only needed for the lead developer and co-developer(s), if applicable. OHFA will review the management company at project application.

Q: Under some circumstances, it is possible to have a co-developer in a LIHTC project sponsored by a CHDO. I realize the CHDO must control 100% of the GP interest. How significant can the role be for the co-developer if the CHDO must still demonstrate its ability to develop the project? Does OHFA have guidance on this?

A: Please see last year's FAQ as guidance. Further, 24 C.F.R. §92.300(a)(3) defines the roles of the "developer".

HDAP Resources and CHDO

Q: On page 21 of the Guidelines, CHDO-sponsored projects are eligible to request HOME funds. Are there other sources of HDAP funds available this year?

A: OHFA does not have additional HDAP resources for the 2025 9% LIHTC round outside of the HOME funds for CHDO-sponsored projects.

Q: In order to qualify for the CHDO funding, does the project A) need to be owned **and** developed by the CHDO? B) would it be okay for the CHDO to serve as the sole GP and the CHDO and Developer as co-developers?

- 5 -

A: The Guidelines incorporates 24 CFR 92.300(4)) by reference on page 21 of the Guidelines. The HUD regulations provide the project can qualify for the CHDO funding and as a CHDO project if it is "sponsored" by the CHDO. Page 21 of the Guidelines references "state-certified CHDO as defined in 24 C.F.R. §92.300(a)(4)." A Sponsorship by the CHDO means if it is rental housing "owned" or "developed" by a subsidiary of the CHDO, a limited partnership of which the CHDO organization or its subsidiary is the sole general partner, or a limited liability company of which the CHDO or its subsidiary is the sole management partner, as provided in in 24 C.F.R. §92.300(a)(4). See (https://www.ecfr.gov/current/title-24/subtitle-A/part-92#p-92.300(a)).

A) No, the project does not need to be owned and developed by the CHDO.

B) Yes, this structure would qualify for CHDO funding under the Guidelines.

period at least equal to the period of affordability in § 92.252.

(3) Rental housing is "developed" by the community housing development organization if the community housing development organization is the owner in fee simple absolute (or has a long term ground lease running for the full period of affordability in § 92.252) and the developer of new housing that will be constructed or existing substandard housing that will be rehabilitated for rent to low-income families in accordance with § 92.252. To be the "developer," the community housing development organization may share developer responsibilities with another entity but must be in charge of all aspects of the development process, including selecting the site, obtaining permit approvals and all project financing, selecting architects, engineers, and general contractors, overseeing project progress, and determining the reasonableness of costs. The requirement that a community housing development organization is in charge of all aspects of the development process must be enforceable through a written agreement (*e.g.*, a joint venture agreement or master development agreement). At a minimum, the community housing development organization must own the housing during development and for a period at least equal to the period of affordability in § 92.252. The participating jurisdiction may permit the community housing development organization to sell or otherwise convey the housing to a nonprofit organization other than a community housing development organization, subject to all applicable requirements of this part, if the participating jurisdiction determines and documents that the community housing development organization no longer has the capacity to own and manage the housing for the full period of affordability and there are no other community housing development organizations within the jurisdiction with capacity to own and manage the project for the full period of affordability.

(4) Rental housing is "sponsored" by the community housing development organization if it is

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Q: If a nonprofit applied for CHDO certification, does this provide both CHDO certification and E&C approval for the CHDO?

A: No, these are two separate processes. The nonprofit would need to apply for both CHDO certification and E&C approval as they have different submission requirements.

Q: CHDO certification only happens once a year, correct?

A: Correct. For 2026, CHDO's must apply for certification between December 2, 2025 and January 8, 2026. There is no other submission window for 2026 programs. If OHFA does not fulfill the CHDO set aside requirement in the 2026 9% LIHTC round, OHFA may include CHDO in another program.

Project Eligibility

Q: If a hypothetical application had a project with 50 existing units, it has never been rent or income restricted, but has 10 occupied units would this still compete in the New Affordability pool because the *majority* of the units are New Affordability? In other words, one occupied unit doesn't turn it into Preservation, correct?

In order to qualify for New Affordability, the Guidelines says, *"Developments in which the majority of units are newly constructed or existing units that are neither currently income-restricted nor occupied and will be rehabilitated may participate in this pool."* Last year's FAQ said on page 1, *"Yes, project eligibility is based on the majority of units so if the majority of units preserve existing affordability, then it would compete in the preserved affordability pool."*

So my interpretation is that the majority of units are newly affordable, so that is the correct pool. Can you confirm if that is the correct interpretation?

A: Since this will be a New Affordability project, the project will compete in this funding pool and will be subject to this funding pool's threshold requirements including the New Affordability max LIHTC request.

However, the project must use the preservation (rehab) cost containment standards and include the following:

- Audited Financial Statements for Existing Properties at Proposal Application, noting that if audited financials are not available, Certified Financial Statements will be provided.
- Public notification to accessibility groups
- A Physical and Capital Needs Assessment for the renovated properties. This will be coordinated with the Scope of Work and the Hard Construction Cost per renovated unit will be at least $80,000 per unit.
- A Relocation Plan at Final Application and the project will follow the Uniform Relocation Act Requirements

34. Relocation Plan (existing, occupied rental units only)

When is this due?	E/C		Proposal Application		**Final Application**	X	8609	

Any development involving rehabilitation of occupied units that will result in permanent displacement must submit a complete **Acquisition, Relocation, and Demolition Questionnaire** and **Relocation Assistance Plan**. OHFA may prohibit, limit, or mitigate any permanent displacement.

If a development will result in resident relocation during the construction period, the application must include a narrative detailing the tenant relocation plan addressing the method(s) for relocating residents, provide a breakdown of any associated costs, and identify if tenants will be permanently displaced.

PY 2026-2027 9% LIHTC QAP 60

Q: Can projects competing in the Tenant Populations with Special Needs pool designate as either General Occupancy or Senior?

A: Yes, projects can be age restricted as either General Occupancy or Senior in this funding pool.

Scoring

Q: We have two separate senior properties in the same city but located 1.9 miles apart in two different census tracts. Project A consists of 12 units and not in a QCT. Project B consists of 20 units and is in a QCT. If we wanted to combine them into a single 32-unit property under one application, how would OHFA calculate the following:

1. The Neighborhood Opportunity Index & Housing Need Index Scores?
2. The Eligible Basis Boost?

A: Scoring would be based off the census tract of Building B as it includes the majority of project units, assuming that all units will be LIHTC units. The project would also use the Senior Neighborhood Opportunity Index to calculate the score as this project is serving seniors.

As for the basis boost, it is based on the building. So Building B would get the codified QCT basis boost, but Building A would not. However, the project could receive a Discretionary Basis Boost for Building A, if the project meets the policy outlined below and within the Guidelines.

Further, given that a majority of LIHTC units are located within a QCT, this project may also be eligible for the QCT with a Concerted Community Revitalization Plan (CCRP) set aside, if the project is located in an area with a CCRP.

1. Neighborhood Opportunity Index

Maximum points: 40

Rationale: The Neighborhood Opportunity Index is created in partnership with the Urban Institute and will be updated on an annual basis to ensure the latest available data is used. Two Neighborhood Opportunity Indices have been created to identify opportunity based on the project's targeted population: General Occupancy and Senior.

The Neighborhood Opportunity – General Occupancy Index distills four critical categories of neighborhood opportunity with 20 total indicators into one Neighborhood Opportunity – General Occupancy Index Score number that aims to identify access to economic and social opportunity by individual Census Tracts. These categories include opportunity-rich and inclusive neighborhoods, high-quality education, rewarding work, and healthy environment and access to good healthcare.

The Neighborhood Opportunity – Senior Index distills three critical categories of neighborhood opportunity with 15 total indicators into one Neighborhood Opportunity – Senior Index Score number that aims to identify access to economic and social opportunity by individual Census Tracts. These categories include opportunity-rich and inclusive neighborhoods, rewarding work, and healthy environment and access to good healthcare.

Projects that serve seniors, must use the Neighborhood Opportunity – Senior Index. All other projects must use the Neighborhood Opportunity – General Occupancy Index.

The project's raw Neighborhood Opportunity Index Score is delineated in OHFA's 2026-2027 **Neighborhood Opportunity Index** and will be worth 40% of the project's total score.

How can points be demonstrated to OHFA?
Neighborhood Opportunity Index: The AHFA will automatically calculate the Neighborhood Opportunity Index score based on the project's location (majority of LIHTC units) within a 2020 Census Tract and the population served.   Calculation: Census Tract raw Neighborhood Opportunity Index score × 0.40

Eligible Basis Boost

(1) Codified Basis Boost

In accordance with 26 U.S.C. §42(d)(5)(B), buildings located in Qualified Census Tracts (QCT) or Difficult Development Areas (DDA) are statutorily eligible for an increase in eligible basis of up to 130%. Such designations are typically determined by HUD in October of the prior year in which such buildings are eligible. To determine if a building is located in a QCT or DDA, visit HUD's Office of Policy Development and Research (PD&R) Web site here.

Preserving an expiring QCT or DDA: If an area is not on a subsequent list of QCT or DDA, an applicant may submit a request to the 9% Housing Tax Credit Section Chief to preserve its respective QCT(s) or DDA(s) if the Carryover Allocation Agreement is made no later than the end of the 730-day period after the applicant submits a Final Application to OHFA needing no more than de minimis clarification, and the Final Application submission is made before the effective date of the subsequent lists. OHFA will execute a QCT(s)/DDA(s) preservation letter after meeting the aforementioned items.

(2) Discretionary Basis Boost

In accordance with 26 U.S.C. §42(d)(5)(B)(v), state housing credit agencies may allow for buildings to be considered located in a DDA and therefore eligible for an increase in eligible basis of up to 130% if needed for such buildings to be financially feasible as part of a qualified 9% LIHTC project. To qualify for the agency discretionary basis boost, OHFA will require the deferral or recontribution of 1% of the total developer fee for every 1% in state-designated basis boost. Such deferral or recontribution must be permanent financing in the form of a deferred developer fee, general partner/managing member capital contribution, sponsor loan, or any combination thereof.

Q: How do you score a senior vs. family preservation deal? There are not separate sub pools in the preservation pool, so as a senior project do you use the Neighborhood Opportunity - Senior Index or the Neighborhood Opportunity - General occupancy index?

A: These are scored based on the population served as referenced in the Guidelines. Thus, a senior preservation deal will be scored using the senior opportunity index and a general occupancy preservation deal will use the general occupancy opportunity index.

How can points be demonstrated to OHFA?
Neighborhood Opportunity Index: The AHFA will automatically calculate the Neighborhood Opportunity Index score based on the project's location (majority of LIHTC units) within a 2020 Census Tract and the population served.   Calculation: Census Tract raw Neighborhood Opportunity Index score × 0.40

Submission Requirements

Q: Under the Environmental Site Assessment submission item for the 9% application it says, "Applicants may submit a Phase I ESA dated between six months to one year prior to the application deadline but must submit an update at final application".

If we have a Phase I ESA dated from June 2025 is it acceptable for the proposal application and will not need to be updated unless we get invited to apply for final?

A: Yes, that is correct. Given that date (June 2025), it is eligible to be submitted with the proposal application since it is less than 12 months old. However, if the project is selected to move forward with a Final Application, OHFA requires an updated Phase 1 at final application.

Q: We have land in contract with a closing date of no later than 6/15/2026. Since reservations will be announced and CQL letters issued in May, we'll have all of the information we need to make that determination before 6/15/2026. At that time, we would either purchase the property (if we were to geta LIHTC award) or terminate the contract.

We bring this up because the 6/15/2026 date is less than six months from the Proposal Application due date. But the contract doesn't *expire*, it will result in either our fee simple ownership or a termination of the contract, both of which are at our sole discretion. So if we were to get an award in May, we would close on or before 6/15/2026 and thus the Evidence of Site Control included in our Final Application would be the executed and recorded deed.

Can you please confirm this satisfies the Evidence of Site Control?

A: No, at proposal application, all forms of site control must be valid for at least six months beyond the proposal application deadline, consistent with the Evidence of Site Control requirements in the Guidelines.

Since the proposal application is due February 26, 2026, applicants must demonstrate site control that does not expire before August 27, 2026 in order to meet the six-month requirement. If language is included that makes it an “automatic” purchase, then this requirement may be waived. However, if the contract includes clauses that allow for an extension, then this would violate an automatic purchase.

Further, this same six-month standard will also apply again at final application, which requires site control to extend six months beyond the September 17, 2026 final application deadline, so March 17, 2027, unless it has already been acquired.

Q: We are reaching out to confirm the details around the Supportive Services Plan and Providers deliverable in the Guidelines. We are planning to submit a general occupancy project at proposal application stage, and we will be including a fee for supportive services in our operating budget for that project. Does that mean that we will be expected to submit the requirements in Supportive Services Plan and Providers deliverable or is that requirement just for Senior and Tenant Population with Special Housing Needs projects?

A: Yes, the applicant will need to submit a supportive services plan and providers since the project will be providing supportive services. However, there is no time requirement nor certification requirement for the supportive services provider. We only have these requirements for the New Affordability Senior and Tenant Populations with Special Housing Needs funding pools.

40. Supportive Services Plan & Providers

When is this due? E/C [ ] **Proposal Application** [X] **Final Application** [X] **8609** [X]

At Proposal & Final Application: For projects that propose providing supportive services (including all Senior projects and Tenant Population with Special Housing Needs applications), the applicant must provide a narrative detailing the specific services to be provided, the proposed service provider(s), its (their) history providing such services, and a budget.

At 8609 Submission: For projects with supportive services, the Supportive Services Plan (SSP) is due no later than the request for IRS Form 8609. Applications or requests for Form 8609 must include evidence of salaried or in-kind service coordination on-site, contiguous, or accessible to the development and linkages to information and resources appropriate to the population. All service coordinators must have a history of serving the targeted area or population.

PY 2026-2027 9% LIHTC QAP 62

Q: Do multi-tenant building ownership/master lease agreements need to be defined at submission?

A: Yes, a preliminary condo document and/or master lease agreement should be provided at final application. The agreement should define all spaces within the property boundary (commercial/LIHTC/market rate/etc.) that share a building(s). This should be reflected consistently in the AHFA (Details tab/ Floor area breakdown) & Design Construction Features Form (Dev & Floor Area Details tab).

Items that should be listed in the documentation include:

- Gross area including all spaces (commercial/LIHTC/market rate/etc.)
- A list of shared features (site, parking, exterior facade, utility access, common roof, etc.) shared by multiple tenants.
- Ratio of LIHTC vs non-basis elements
- All non-basis elements should be identified on drawings with (measurable graphics) shading(poche) and noted as “not in contract/ NIC”.

Threshold Requirements

Q: We are reviewing our scope of work for a scattered site preservation project. With all costs associated with the total project, we are anticipating that the total rehabilitation hard construction will meet the minimum hard construction cost per unit of $80,000, as required in the Guidelines on page 41 (Threshold Requirements- Preserved Affordability). However, we wanted to confirm this minimum standard applies to the project and not each individual property or unit. Some of the units have had upgrades and may not cost $80,000, while other units have much higher needs to be addressed (therefore together, the project will be over $80,000 per unit but there will be some units that do not meet this standard while other units will far exceed this standard). We believe that OHFA is seeking an aggregate that costs $80,000 per unit or more, but not every unit must hit the $80,000 unit threshold, please confirm our understanding.

A: Correct, OHFA's analysis is based on the sum of Hard Construction (residential rehab), construction contingency, and FF&E divided by the number of units. As long as this number meets or exceeds $80,000, then the project will meet this threshold.

Please note individual buildings must still meet the minimum rehab expenditures to qualify for LIHTC, per IRC 42(e)(3).

Q: One of the "Lifestyle Amenities" possibilities, listed on page 23 of the Guidelines, is "On-site resident services/service coordination." Under "How to demonstrate to OHFA at final application?" it reads "If the project is in the New Affordability Seniors or Tenant Population with Special Housing Needs funding pools, then they must comply with those requirements."

If one is submitting in the New Affordability - Senior pool, must one choose two Lifestyle Amenities *in addition to* service coordination, or can service coordination count as one of the two required amenities?

A: Service coordination would count as one of the two required lifestyle amenities for a New Affordability - Senior project since they are required to have supportive services. Further, if the project will include on-site supportive services offices, then this would count as one of the two required Building Amenities.

Q: Per the Guidelines, "All projects competing in the New Affordability – General Occupancy pool must commit 15% of the total LIHTC units or 11 units total, whichever is lower, to being encumbered by 811 PRA and accept referrals from the Interagency 811 PRA team. All 811 PRA units must be one-bedroom units." If a General Occupancy project does not include any one-bedroom units, is there an exception request form that should be completed to address this threshold item?

A: Yes, the applicant may include a programmatic exception request with the proposal application to shift 811 PRA from one-bedroom units to two-bedroom units. This request must be supported by the market study.

Q: Is it correct to assume that, since 811 units are programmatically set at 30% AMI, that these count towards the General Occupancy Extremely Low-Income (ELI) targeting threshold requirement? If a project has 64 units and thus requires ten (10) 811 units (lower of 11 or 15% rounded up), that these then also satisfy the 10% or 15% ELI requirement based on Housing Needs Index?

A: No, the ELI units must be rent and income restricted at 30% AMI. Whereas the 811 PRA program units would be rent restricted at 50% AMI or FMR, whichever is lower (Rent Limit), but income restricted at 30% AMI (Income Limit). Thus, these two types of units do not overlap and will be shown separately within the AHFA.

Q: Will OHFA make 811 PRA available to projects competing in the Tenant Populations with Special Housing Needs pool for projects serving individuals with developmental disabilities? If so, what documentation should be submitted with the Proposal Application to document the availability of rental subsidy?

A: No, this funding source is explicitly excluded from the Tenant Populations with Special Housing Needs funding pool.

Tenant Populations with Special Housing Needs

Allocation Targets and Definitions

Allocation Goal: 22% of the total annual credit ceiling

To fulfill selection criteria of 26 U.S.C. §42(m)(1)(C)(v): Tenant populations with special housing needs, all projects competing in this funding pool must meet the following criteria:

1) At least 25% of the total units serve target populations with special housing needs at or below 30% AMI. Eligible target populations include:
    - i) Populations at or below 30% AMI with a disability, as defined in the Interagency Council on Homelessness and Affordable Housing **Permanent Supportive Housing (PSH) Policy Framework** and, as evidenced by one of the following factors set forth in Section II.B.3 of HUD Coordinated Entry Notice **CPD-17-01**:
        - (a) significant challenges or functional impairments, including physical, mental, developmental, or behavioral health challenges, which require a significant level of support in order to maintain permanent housing;
        - (b) high utilization of crisis or emergency services to meet basic needs, including but not limited to emergency rooms, jails, and psychiatric facilities;
        - (c) vulnerability to illness or death;
        - (d) high risk of homelessness; and/or
        - (e) vulnerability to victimization, including physical assault, trafficking, or sex work;
    - ii) Transition-Aged Youth (TAY), those 18-24 years of age who are exiting or formerly involved in the foster care, juvenile justice, or behavioral health systems without a qualifying disability under item (i);
    - iii) Expectant mothers or parents experiencing housing instability, particularly those engaged with public health or maternal health programs aimed at reducing infant mortality;
    - iv) Parenting students that are 18 years of age, the custodial parent of at least one child, and are enrolled in a degree-seeking program at an accredited college or university (e.g., Scholar House model);
    - v) Refugees identified by a Refugee Resettlement Agency, as referenced on the Ohio Department of Job and Family Services website, that are experiencing housing barriers.

2) 100% of the total units serving the target population must have a firm commitment for project-based rental subsidy or rental assistance, excluding HUD 811 PRA.

3) The majority general partner or managing member must be a non-profit organization with experience developing, owning, or managing housing for the proposed target population(s).

4) Supportive services must be available and appropriate to the needs of the target population.

5) The proposed project must comply with 26 CFR § 1.42-9, the general public use requirement.

Q: Projects competing in the New Affordability – General Occupancy must commit 15% of the total LIHTC units to being encumbered by 811 PRA and these units must be one-bedroom units. However, Appendix C: Single Family Lease Purchase states that all single-family homes or townhomes must include at least three bedrooms. Which requirement must be met?

A: Scattered-site single-family developments are exempt from the HUD 811 PRA threshold requirement within the New Affordability – General Occupancy funding pool. However, these projects must submit a programmatic exception request with the project application to receive such a waiver.

Q: Does OHFA have a sample Pet Lease Addendum to be submitted for the Pet Lease Addendum Lifestyle Amenity?

A: Please find an acceptable sample pet lease addendum on our website under Forms.

End