

August 27, 2026

Barbara Richards
Multifamily Housing Director
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

Dear Ms. Richards,

The Ohio Housing Authority Conference (OHAC) thanks you for the opportunity to comment on the first draft of the 4% LIHTC with Bond Gap Financing – DRAFT Program Year 2026 Guidelines.

The members of the Ohio Housing Authority Conference are Public Housing Authorities that serve the entire State in rural and urban areas in all 88 counties. Collectively OHAC members own nearly 50,000 units of public housing and administer nearly 90,000 Section 8 vouchers. PHAs are committed to their residents and communities, providing residential services and opportunities. We are long-term stewards of our properties, sometimes making properties over 70 years old work despite not receiving enough capitalization funds.

NHTF – Rental Assistance Demonstration Pool

First, we want to thank OHFA for listening to us and others about the need to preserve extremely low-income (ELI) affordable deals through the RAD program. Creating a funding pool dedicated to this valuable resource will benefit Ohio and its ELI residents, and PHAs are ready to participate and help OHFA achieve its goals.

We encourage additional clarity about minimum number of units, minimum percentage of ELI units, and minimum expenditures for rehab. We ask OHFA to consider restricting eligibility to applications that have a CHAP from HUD covering a majority of the total project units rather than projects that include a small percentage of RAD units simply to qualify for the pool. And while we deeply appreciate that the top two tiebreakers for this pool are focused on serving the most vulnerable population and the most affordable units, we ask OHFA to consider the age of public housing stock and the degree of deferred maintenance due to underfunding by HUD by creating a number 3 tie breaker or a scoring category wherein a project must spend a certain dollar amount per unit in hard construction costs. We suggest the amount be set between \$100,000 and \$150,000.

Additionally, we ask OHFA to provide clarity of its revitalization plan requirements. In particular, we ask OHFA to consider that revitalization plans include CHOICE planning

efforts and potentially other extensive planning efforts that PHAs have undergone to demonstrate the need for revitalization along with a plan forward.

We are grateful for the "Readiness to Proceed" category but would ask OHFA to consider the fact that the closing of RAD deals are HUD-controlled and the timing is often outside a housing authority's control.

Thank you for seeking feedback. We look forward to continuing our discussions with you about OHFA policy, and we greatly appreciate your diligent efforts to listen and engage.

Sincerely,



Colleen M. Dattilio
Chair, Real Estate Committee
Ohio Housing Authorities Conference