



August 25, 2026

Via Email: BGF@ohiohome.org

Ben Peyton
4% Housing Tax Credit Section Chief
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

RE: 4% LIHTC with Bond Gap Financing -DRAFT Program Year 2026 Guidelines

Mr. Peyton,

Thank you for the opportunity to comment on OHFA's Draft Program Year 2026 Guidelines for 4% LIHTC with Bond Gap Financing (BGF Guidelines). Preservation of Affordable Housing (POAH) values the opportunity to share our perspective as OHFA updates the BGF Guidelines.

We appreciate OHFA's reinstatement of exception requests in relation to cost containment in this draft of the BGF Guidelines. We also appreciate OHFA's commitment to working collaboratively with project sponsors.

As OHFA continues to refine the BGF Guidelines, we hope you will consider these recommendations:

Preservation

As OHFA's Office of Research and Analytics has published, Ohio has some of the oldest housing stock in the nation, with a quarter built before 1940 and two-thirds before 1980. OHFA's FY26 Ohio Housing Needs Assessment highlights that while housing production has risen since 2019, there has also been a net loss of affordable housing units for very low-income households, with a shortage of over 200,000 units¹.

Given Ohio's aging housing stock, ongoing loss of affordable inventory, and significant shortage of affordable units for very low-income households, POAH is concerned about the removal of the Preserved Affordability funding pool from the draft BGF Guidelines. As drafted, the BGF Guidelines restrict BGF eligibility to RAD projects and HOME projects located outside participating jurisdictions (PJs), excluding nearly all preservation projects and removing one of the only financing tools currently available for this important work.

While housing production has increased in recent years, it has not fully offset the steady loss of affordable housing units or addressed the growing demand among very low-income households. As a result, preserving existing affordable housing remains essential to addressing Ohio's housing shortage and affordability challenges. Older properties often require significant capital investments to address deferred maintenance, building system upgrades, and environmental concerns. At the same time, preservation creates opportunities to revitalize

¹ [FY26-HNA-ExecutiveSummary.pdf](#)

neighborhoods, improve energy efficiency, and enhance residents' comfort and quality of life while maintaining long-term affordability.

POAH encourages OHFA to keep a dedicated funding pool for preservation as part of the 4% BGF program. While larger organizations may have access to a broader range of financing tools, many smaller nonprofit and mission-driven owners do not. Maintaining a dedicated preservation funding pool would help ensure that these owners can address capital needs, preserve affordability, and avoid further deterioration of Ohio's existing affordable housing stock. This pool should be open to projects in PJs, since the bulk of at-risk affordable inventory is in those geographies and the preservation need far exceeds the federal resources targeted to PJs.

Experience and Capacity Standards

POAH has appreciated OHFA's work in recent years to evolve its developer experience and capacity standards across programs to ensure that sponsors with extensive out-of-state experience who are responsible for aging, OHFA-financed properties are eligible to compete for resources to preserve and renovate them.

We are deeply concerned that the draft BGF Guidelines would erase this recent progress, excluding sponsors from applying unless they have placed LIHTC projects in service – even if a sponsor has placed dozens of projects in service in other jurisdictions; and/or has one or more OHFA-funded projects in construction.

As POAH has noted in previous comments, excluding otherwise-experienced and high-capacity owners on this basis will also exclude the properties and residents for which they are responsible from accessing the funding they need to make increasingly urgent repairs.

We strongly encourage OHFA to revert to earlier participation standards, which allowed experienced owners to apply for OHFA resources irrespective of in-state placed-in-service experience.

We would be happy to discuss or elaborate on these comments if that would be helpful to OHFA as you continue to refine the Guidelines. Again, POAH deeply appreciates OHFA's commitment to ensuring the Guidelines respond as fully as possible to Ohio's housing needs and priorities.



William Eager
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Preservation of Affordable Housing (POAH)