



Program Year 2026 BGF Guidelines Draft - Woda Comments

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To OHFA NHTFAllocation Mailbox <NHTFAllocation@ohiohome.org>

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A few things stick out:

1. Minimum Hard Construction Cost per Unit:

If OHFA were to raise the minimum hard construction cost per unit of \$60K, then a Non-Participating Jurisdiction (Non-PJ) would be severely disadvantaged which are overwhelmingly rural in nature. A Non-PJ doesn't have access to additional resources that a Participating Jurisdiction (PJs) has through HUD. This makes a Non-PJ dependent on OHFA resources to fill any potential gap and may prohibit a Non-PJ project from applying altogether. We caution OHFA against raising the minimum for Non-PJ, but if OHFA were going to take this approach, OHFA should increase the max amount of financing available accordingly.

2. Expiring Extended Low-Income Housing Commitment:

It is admirable for OHFA to incentivize developments with expiring LIHTC restrictions. However, the drop in points within the tiers is pretty drastic as it currently stands (please see below):

Years Remaining in Extended Use as of December 31, 2026	Points
Expired in last 18 months	20
Less than 2	10
2-3 years	7
No More than 5	0

Suggest OHFA open the tiers slightly to accommodate more projects:

- Expiring within last 2 years = 20 points
- Expiring within last 2-3 years = 15 points
- Expiring within last 3-5 years = 10 points
- Greater than 5 years = 5 points

3. Final Application:

OHFA has eliminated the proposal application and is moving right to Final Application. Certainly, understand the desire to move quickly given the scarce resource and incentivize projects and development team that can achieve this. However, OHFA is also requesting 80% plans at Final Application regardless of whether a developer knows the funding has been received or not. It is very rare to incur this expense unless a tax credit award has been received. Therefore, suggest OHFA accommodate this by doing a short proposal app so it can be determined earlier on in the process whether the development will receive an award OR move up the final application and allow the 80% plans to come in at a later date (example: 90 days after).

Thank you for your consideration of this request.

Warm Regards,



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