



June 26, 2026

Ohio Housing Finance Agency
Architecture & Design Team
2600 Corporate Exchange Dr Suite 300
Columbus, OH 43231

RE: Review of 2027 Design and Architectural Standards (DAS)
Review of the 2027 Design & Architectural Process Manual (DAPM)

To Whom it May Concern:

I want to first thank you all for the opportunity to review the new 2027 DAS & DAPM. We know that this re-write of the standards took tremendous work and we are pleased at many of the improvements and how they will allow us to deliver more quality housing to people in Ohio who are in need.

Upon the review by the BDCL Architects and Pivotal Housing Partners team, we want to offer up the following detailed comments for consideration.

2027 Design and Architectural Standard (DAS) Review

1. General Comment: There are many places throughout the DAS where there is a duplication of the requirements of the adopted and enforced Ohio Accessibility, Energy, and Building Codes. These codes are the mark of compliance for all housing built in Ohio and attempting to exceed them will only limit the amount of housing that we can provide to residents due to increased costs. We suggest letting those enforced standards do their job and not duplicate references in the DAS.
2. G2 Definitions: The Common Space definition does not follow the BOMA standards as there is no delineation for Circulation Space in that standard. This results in confusion when assembling square footage calculations for OHFA projects. If the circulation space breakout is necessary for analysis by OHFA, further explanation on how the BOMA standards should be modified should be included.
3. G3 Codes and Compliance Standards: As stated above we don't feel it is necessary to list the codes that apply to the project that are already a requirement by the Ohio Board of Building Standards. This is redundant and doesn't offer any additional help to Architects by their inclusion in the DAS. We suggest eliminating the references to the OBC & RCO but leave the special standards which apply only



to affordable housing listed just after (starting with “All developments must also conform to...”).

4. G4 Adaptability & Accessibility Laws: Under the definition for Mobility Unit under the 504 unit types, the language is very confusing when talking about units being on multiple floors. We suggest eliminating the second and third sentences and revising the first sentence to say “All 504 units, including Mobility, must be provided in a variety of unit configurations and distributed throughout the development, buildings, and floors.”
5. G5 OHFA Accessibility Requirements: Currently within this section there is no guidance on how the number of accessible units are to be calculated, specifically the additional ones that are required to be above the Section 504 5%/2%. Should the 5% and 2% be calculated and then doubled or should the 10% & 2% be taken from the total for the entire development?
6. G5 OHFA Accessibility Requirements: While we appreciate the attempt at providing greater accessibility on OHFA developments, we feel that 10% 504 Mobility units is more than is necessary for family developments and may be more than is necessary for senior developments. If too many of these units are provided this becomes a burden to leasing and may lead to units sitting vacant because the additional Mobility Units are not needed. 5% is and has been the standard for federally funded projects and we suggest sticking with that number and letting the development teams decide when it is appropriate to provide more for a given market. There is also safeguards for all project in that many (if not all) of the units are required to meet ANSI A117.1 Type B requirements – allowing adaptability should additional “accessible” units be needed. There is no way to perfectly decide the exact number of accessible units needed for a given development but we feel the HUD / Section 504 requirement is still the best standard to follow.
7. G5 OHFA Accessibility Requirements: Previously we have commented on the Additional Features for 504 Mobility Units and feel that these Columns need to be completely reconsidered. There are only a handful of items that almost all projects will select and the desired variety in design will not occur. Also, in Column A2, the 4 items listed are very expensive and will be difficult to include within the project’s budget. We suggest eliminating Column A2 or completely re-writing with new options. We also suggest re-looking at the other Columns to provide items which are equal in cost impact to the project which will result in greater variety.
8. G5 OHFA Accessibility Requirements: Under the Important Reminders section, the storage equivalency notes need to be written with greater specificity. As it stands right now, the notes are too subjective and more objectivity is needed.
9. N3.2 Building Design: Consistent with our notes above, we feel that items 3.2.2, 3.2.3 and 3.2.4.1 all need to be eliminated. All of these requirements are a requirement of the Ohio Building Code and no value is provided by repeating them within the DAS.



10. N3.5 Bathrooms: Requirement N3.5.3 for roll-in showers in all 504 Mobility units provides a burden both financially and for leasing within family developments. In family properties, someone who might need an accessible unit but also has a family, this limits their ability to bathe their children. The Ohio Building Code under Chapter 11 requires a mix of accessible roll-in showers and accessible bathtubs. We suggest that this same logic be applied to the DAS and a mix of both roll-in showers and accessible tubs be permitted.
11. N3.6 Kitchen & Appliances: The requirement N3.6.4 for landing zones is one that needs to be eliminated altogether. These landing zones limits design flexibility and only increases the sizes of kitchens for projects. If a minimum amount of countertops is desired then we suggest right-sizing that requirement and offer up a minimum linear footage of countertop by unit size. This will allow designers the most amount of flexibility and will not artificially inflate the kitchen size within units. For an example of how this requirement can be successfully administered, see the Appendix B from the North Carolina Housing Finance Agency (NCHFA).
12. N3.7 Doors: Requirement N3.7.1.2 for solid core doors is one that we have commented on several times and we do not see the need for solid core doors in our developments. Pivotal Housing Partners manages well over 10,000 units across the country and only Ohio has a requirement for solid core doors. The Property Management team for Pivotal has only seen a handful of hollow-core doors that have had to be replaced in the lifespan of the project. As with some of our previous comments, we believe that the requirement should be eliminated and allow the Developer to make this improvement when they feel it is necessary for their project type and demographic.
13. N3.9 Durability: For requirement N3.9.2.5 we suggest eliminating the requirement for Energy Star windows altogether. The Ohio Energy Code has already set the bar for the efficiency of windows that should be used in all residential projects and exceeding that bar does not provide much value and increases costs for a development.
14. N3.9 Durability: For requirement N3.9.2.7, we would like further clarification on the process that needs to be followed to get an equivalent carpet approved. Also, if there are carpets that have been approved, we recommend that a list of those be published so that all developers have the opportunity to utilize them on their developments.
15. N3.10 Building Systems: OHFA has several references to ASHRAE 90.1 within this section and that is very limiting compared to what the Ohio Building & Energy Codes already permit. Ohio Energy Code allows the use of both ASHRAE 90.1 and the IECC and limiting it to only one puts further strain on developments. We suggest eliminating these requirements as the Ohio Building Code already carries the load for what should be accepted for Water Heaters and HVAC Systems.
16. N3.10 Building Systems: Requirement N3.10.3.2 for rocker switches is one that we feel is unnecessary. The Ohio Building Code and all Accessibility Codes permit the



use of toggle switches as something that is accessible. Although it is a small increase to go to rocker switches, this cost multiplied across developments adds up in cost and does not provide any more valuable beyond the already accessible toggle switches.



2027 Design & Architectural Process Manual (DAPM) Review

1. Architectural Submission and Review Process: The most major item for the DAPM is the lack of dates associated to the timing of the OHFA staff review. Our greatest concern here is that if review comments from OHFA staff are received too late in the process then that can result in change orders to the project after closing or will push out closing dates trying to incorporate those OHFA comments into drawings and the project's contract cost. We suggest putting a deadline for the OHFA staff review at 60 days prior to the Developer's proposed closing date. This will give time for the design teams to respond to comments, revisions to be made, and time for the General Contractor to adjust their budgets accordingly as a result of these changes.
2. Architectural Submission and Review Process: In the first paragraph it states that the communications need to be sent to the arch@ohiohome.org email address but also requires we sent communication to the OHFA architectural staff and OHFA Underwriting Analyst. Who specifically do we need to send information to on the OHFA architectural staff? Suggest listing names and emails of staff that need to receive this information.
3. Required Documents - Preliminary: The Scope of Work form is listed but is not required for 4% developments at preliminary architectural submission. Suggest providing clarity between 9% and 4% submissions so exactly what needs to be submitted is known. Or, maybe the requirement for the SOW form might be better contained within the QAP since this form is not really a design or architecture form, it is one prepared by the General Contractor.
4. Required Documents - Preliminary: We feel there should be greater clarity on what exactly is meant by "site details". What details would OHFA like to see so that all Architects are preparing the same information.
5. Required Documents - Preliminary: We notice that color-coded floor plans have now been added and the requirement for CAD files has been eliminated at preliminary. We appreciate the elimination of the CAD files but want to note that additional time will be needed in order to prepare a color-coded plan.
6. Required Documents – Final: The requirement for completed verifications needs to be eliminated as the drawings will not be complete enough at an 80% set to get verification that the drawings comply with accessibility or energy efficiency. If OHFA is just looking for confirmation from the Architect that they have sought to design the development to the required standards, then maybe a written letter from the Architect would serve that purpose.
7. Required Documents – Final: Several documents listed in this section are Development related and not prepared by design teams. For example, the draft legal agreement under the condominiumized space would not be something that the design team has. Suggest removing the documents that come from the developer and putting them into the QAP.



8. Exception Requests: Can previously approved exception requests be published and used on other developments? This would be very helpful to all developers and allow them to see different options that might help them succeed in their developments.
9. Construction Completion: Many of the items under this section are prepared or dependent upon the General Contractor and gathered and submitted by the Developer, not the Designer. If this document is meant to be directed to the Architect / Designer, then we suggest moving these requirements into the QAP.

This concludes our comments on the DAS and DAPM. Again, thank you for the time spent reviewing our comments and we appreciate the opportunity to offer feedback. Please note, that we did not comment on the rehabilitation portions of the DAS as the BDCL and Pivotal teams do not normally work on rehab type projects. I'm sure there are other developers / architects who will have much better feedback for you on those sections of the DAS.

If you should have any further questions about our thoughts above, please don't hesitate to contact us. Thank you.

Sincerely,

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