

June 29, 2026

Ohio Housing Finance Agency
Office of Multifamily Housing
Attn: Design & Architectural Standards Review
Submitted via email: DAS@ohiohome.org

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

Dear OHFA:

CHN Housing Partners appreciates the opportunity to comment on the first drafts of the 2027 Design & Architectural Standards (DAS) and the accompanying Design & Architectural Process Manual (DAPM). As a nonprofit developer, owner, and manager of affordable housing across Ohio, we design and build to these standards on both new construction and rehabilitation - and we hold and operate the buildings we develop as long term owners and stewards. That dual role of builder and operator shapes the comments below.

CHN wants to begin by recognizing the genuine effort this rewrite reflects. OHFA met with stakeholders across the state, brought the right staff to those conversations, and committed to rebuilding the standards rather than patching what existed. Several changes in the draft will make projects easier to design, review, and finance - separating the standards from the process, accepting electronic-only submissions, right-sizing moisture protection, lowering the efficiency-unit minimum, and adding the accessibility feature menu and new unit options. We support these and encourage OHFA to keep them.

CHN participated in OHFA's stakeholder process alongside our industry peers, and we want to be clear at the outset: CHN fully supports and endorses the comment letter submitted by the Ohio Housing Council (OHC). That letter reflects a careful provision-by-provision analysis of the draft, and we incorporate it here by reference rather than restate it. This letter is intentionally brief. It underscores the few themes we feel most directly as a

mission-driven owner-operator, and it adds a short list of items specific to our work that the OHC letter does not separately address. We particularly endorse OHC's recommendations on the Section 504 mobility "additional features" menu, the twenty-percent common-area cap, and the provisions that merely restate the energy code.

What we most want to emphasize:

Every requirement above the floor carries a cost, and that cost is measured in units.

As a nonprofit, every dollar a standard adds beyond what its purpose genuinely requires is a dollar that no longer houses an Ohioan. We share OHC's view that a design standard should be a floor - there to keep a project out of the gutter - not a preferred design that a good developer would never need. We ask OHFA to weigh the cost of each above-code requirement against its benefit, and, where a true preference rather than a floor is at stake, to place it in the QAP's competitive scoring rather than the design standard. A brief cost estimate shared alongside the final standards would help all of us see that arithmetic clearly.

State the problem each requirement solves. The most useful discipline OHFA can carry into the second draft is to attach, to every requirement that survives, a short statement of the problem it addresses. A requirement that can name its purpose can be tested for fit; one that cannot is usually one that was never needed. Where a provision only restates the building code or federal law, we agree with OHC that it should be removed in favor of the cross-references the document already contains.

Give rehabilitation - and especially historic rehabilitation - a real home. The draft sorts every project into new construction or rehabilitation, and the rehabilitation box does not fit the reality of older and historic buildings, where a fixed structural grid, preservation obligations, and serviceable existing systems make a single new-construction-derived standard expensive or, at times, infeasible. We strongly support OHC's recommendation that historic work receive its own track or a robust, document-wide carve-out, and the items in the next section come directly from our experience rehabilitating and operating these buildings.

Hold both parties to predictable, reciprocal deadlines. Consolidating submissions, timelines, and the exception process into a standalone DAPM is genuinely useful. But the draft sets firm deadlines for applicants without committing OHFA to a timeline for its own review. When OHFA's comments arrive after permit sets and budgets are finalized, they require change orders, added cost, friction with lenders and investors, and sometimes complete reworks. We support OHC's recommendation for defined review windows with a deemed-approval backstop, and for a clearer, more predictable exception and appeals process.

Other ideas for additional features for 504. The Kelsey, Inclusive Design Council, and CSH worked to complete a thoughtful and full list of additional features for 504 Mobility Units. Include with this letter is a copy of the January 2026 version. It can also be accessed at: <https://thekelsey.org/design/>. Many of the items do not incur additional costs and simply need to be integrated into the typical design process and can be highly impactful.

Thank you for an open and genuine input process, and for the evident care this rewrite reflects. We are grateful for OHFA's commitment to stakeholder engagement and stand ready to work alongside the Agency in producing the second draft. We would welcome the chance to share project cost data, or to discuss any of these points in whatever detail is useful. If you have any questions or requests, please contact Jennifer Chandler at jchandler@chnhousingpartners.org.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Andrew Bailey', with a stylized, cursive script.

Andrew Bailey
CHN Housing Partners
Director of Real Estate Development