

MEMORANDUM

June 26, 2026

TO THE ATTENTION OF Ohio Housing Finance Agency

FROM New Republic Architecture
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REGARDING Comments on:
2027 Design and Architectural Standards (May 2026 Draft)
2027 Design and Architectural Process Manual (May 2026 Draft)

2027 Design and Architectural Process Manual (May 2026 Draft)

1. Page 3, Review Process
The period of time between submission of the Final Application and Financial Closing does not commit OHFA to a timely review of the 80% set of documents. With that as the only time restraint, construction documents have been permitted and bid before OHFA has provided any comments. This does not allow comments to be addressed within the typical/ optimal workflow of the design process. In a worst-case scenario OHFA comments could be received the week before closing is scheduled, forcing it to be rescheduled. For renovation projects in particular, where there may be more gray area in compliance, this allowance of 6 months to a year for review is counterproductive. If OHFA seeks to improve the overall process, we recommend holding the turnaround time for these comments to something less than six months.
2. Page 3, Review Process
Is there a draft of the Construction Progress and Monitoring document available for review? We did not see it available for download and are curious how “substantial changes” is defined.
3. Page 3, Required Documents- Preliminary Architectural Submission, Preliminary Drawings
 - For renovations, semi-ambulatory units should be acknowledged along with Mobility and sensory impaired units.
 - More specificity is needed regarding the description of existing historic features.
Throughout the requirements there is an incongruity with how OHFA seeks to have historic aspects of a project documented and the approach taken by Ohio Historic Preservation Office and National Park Service in assessing a building. For Historic Tax Credits, a building's historic character is considered a “sum of its parts”, not as a prioritized list of historic features.
4. Page 4/5, Required Documents- Final Architectural Submission
 - Please clarify what is intended by “...80% complete drawing sets, including complete plans...” In an 80% set, any aspect of the information could be incomplete.
 - Please refer to item 3 above regarding identification of historic features.

5. Page 6, Rehabilitation and Adaptive Reuse

More definition is required for “must include adequate supporting evidence”.

- Accessibility. Is the architect required to provide multiple iterations of proposed schemes and how they may fail to strictly comply with ANSI guidelines? What constitutes adequate evidence? This same issue applies to compliance with basic design standards for kitchen layouts for all units in a rehab situation. For 4% projects, which are intended as a modest rehabilitation, what is the definition of “feasible” in the context of the construction budget?
- Historic Tax Credit Projects. In the past the architect has been asked to provide documentation from the Ohio State Preservation Office as proof of non-compliance with NPS guidelines. OSPO does note, will not, and has not provided such documentation. OSPO also will note speak on what “may” be approved. They will only comment on a design submitted to them, and will not comment in writing on or suggest design options that they would consider compliant.

2027 Design and Architectural Standards Comments (May 2026 Draft)

6. Page 5, Definitions

More specific delineation between Circulation Spaces, Common Spaces, Dedicated Space, and Support Space needs to be provided. “Circulation Space is cited as an example of “Common Space”. Every typical programmatic element for a residential project funded by OHFA should be listed as what category it belongs to (i.e. mail rooms, leasing offices, PSH social service offices, janitors closet, etc.).

7. Page 6, OHFA Square Footage Calculations

BOMA has no standard for measuring bedroom square footage (does it include closets or not). This needs definition.

8. Page 8, Adaptability & Accessibility Laws

For clarity, ANSI/ICC -2009 could be referenced for rehabilitations.

9. Page 9, Section 504 Units

- The requirement for mobility units to be distributed throughout ta building should only apply to buildings equipped with an elevator (and a fully accessible path to the elevator and from the elevator to the unit).
- As other portions of the OBC are cited within the DAS, it would be useful to give cite the appropriate portions of HUD’s 2014 Deeming Notice herein for clarity, and state which of the four ANSI/ICC 117.1 set of criteria (Accessible Units, Type A Units, Type B Units, Type C Units) are intended to accepted for Section 504 Mobility Units in OHFA projects.

10. Page 10, Section 504 Units for General Population

Requirements for New Construction and Rehab should be separated out for clarity. The accessibility requirements in general are a challenge for renovation projects built prior to the creation of the Fair Housing Act. Projects intended as a “refresh” could be required to gut 10% of the units to be in compliance.

11. Page 10, Section 504 Units, Option B

- Semi-Ambulatory Units requirements need further development and more specificity so that requirements are not negotiated in multiple rounds of discussion after review of the

80% set (and immediately before financial closing). There is no definitive set of requirements for these in ANSI, UFAS or any other published guidelines.

- “compliant grab bars”; Please specify. Within ANSI there are four different sets of criteria for dwelling unit accessibility.

12. Page 10, Section 504 Units, Option C

This inclusion is promising, but to be a useful tool, the DAPM Review Process cited in item 1 needs to be revised.

13. Page 11, Additional Features for Section 504 Mobility Units

- The willingness to accept other options is appreciated, but to be a useful tool, the DAPM Review Process cited in item 1 needs to be revised.
- If and how this page applies to Semi-Ambulatory Units requires clarification.
- Column A2 items are extremely problematic for urban projects making use of the Historic Tax Credit program. The first three require exterior considerable space. Casement windows would be deemed as non-compliant unless already existing throughout the building.

14. Page 14, Site Design, N31.3

Will an exception request be readily granted for urban settings?

15. Page 14, Building Design,

- N3.2.3, This is already required by multiple applicable codes.
- N3.3.1.1, consider allowing the 350sf exception to apply to PSH projects as well. Our PSH clients have commented on the tenants being overwhelmed by the size of their units when transitioning out of being unhoused.

16. Page 15, Bedroom Sizes

Define if this square footage is inclusive of closets.

17. Page 15, Bathrooms, N3.5.3

Consider allowing tubs in General Population projects likely to have young children.

18. Page 16, Kitchens and Appliances

Clarify if appliances in common areas are required to meet these requirements.

19. Page 17, Durability

- N3.9.2.5, Parts of Ohio are in Climate Zone 4. Is this citation intentional?
- As window requirements are so often an issue for renovation projects utilizing Historic Tax Credit funding, this subject should be incorporated into the DAS. Would OHFA consider accepting Energy Modeling that consider the building as a whole as an acceptable alternative to specific requirements for windows? Many of these projects are already utilizing this for other funding and thus proving a level of energy efficiency overall. The window requirements are especially problematic in projects subject to fire rating, SHPO, and OHFA requirements. We have not found windows that can comply with all three.

20. Page 17, Building Systems

- N3.10.2.2, The requirement for thermostats is vague.

21. Page 22, Sustainability
Section R4 needs to take the Ohio Existing Building Code into consideration. It references only a few Sections of the IECC.
22. Page 23, Minimum Scope of Work
Please clarify is the Exterior Building Envelope (Roof, windows, etc.) is considered as part of item 2. If not, why not?
23. Page 23, Minimum Scope of Work
 - In the bullet points mid page, please define “excellent”
 - Please clarify what is meant by “New Materials must be at 100% RUL”.
24. Page 23, Expectations at Project Completion
Building systems are not a “material”.
25. Page 24-29, OHFA Design Requirements
 - R4.1.1, Please refer to item 14.
 - R4.2.2.1, Please use a term other than accessible. We believe the intent is that it must be *available for use* to all tenants rather than only for select tenants. For clarity, please avoid the term “accessible” unless discussing accessibility requirements.
 - R4.3.4, These requirements could be extremely challenging for modest renovation projects unless the intent is to require that kitchens and bathrooms be enlarged.
 - R4.9.2. As stated elsewhere herein, ***the Ohio Historic Preservation office does not and will not author letters or any other written documentation to this effect. Nor have they done so in the past.***
 - R4.9.3.5.1 This information is usually in the Specification. Requiring Architects to solicit a letter for information that is in the manufacturer’s available documentation is burdensome.
 - R4.9.3.5, Portions of Ohio are in Climate zone 4. Is this citation intentional?
 - R4.9.3.5.3, Storefronts are a wall system, not a window.
 - R4.9.3.9, This would be problematic for Historic Tax Credit projects in areas with existing trim
 - Semi-Ambulatory units are not addressed
 - There is no mention throughout this section of bathroom doors being required to swing out. This has been required on some rehab projects. If its going to be required in the future it should be implemented here.

END OF MEMORANDUM