



June 29, 2026

The Ohio Housing Finance Agency
57 E. Main Street
Columbus, Ohio 43215

Sent electronically: QAP@ohiohome.org

Dear Multifamily Development team:

On behalf of Home Innovation Research Labs, I respectfully request that The Ohio Housing Finance Agency (OHFA) restore credible, third-party certification to the 2027 Design and Architecture Standards (DAS). Third-party green building certification helps ensure Ohio's investment in affordable housing delivers healthy, durable, energy-efficient homes that remain affordable to occupy throughout their service life. Specifically, we request that NGBS Green Certification be recognized among the certification program options. The NGBS was specifically designed for residential projects and is affordable to implement, making it ideally suited for low-income housing programs.

Third-Party Certification Supports OHFA's Pillars to Housing

By removing the green building certification requirement from the 2027 Draft DAS, the proposed changes weaken two of OHFA's stated priorities: **affordability** and **quality of life**.

Addressing Affordability

While eliminating third-party green building certifications may appear to reduce project costs and improve affordability, it ultimately does the opposite – depriving residents of healthier, more durable, and more energy-efficient homes while increasing their long-term housing costs. Green building certifications reduce monthly operating costs specifically for energy and water bills, directly lowering costs for renters. High-performance and green certified homes deliver measurably lower utility costs compared to code minimum homes:

- In 2025, the average American household spent \$187 a month or \$2,244 a year on electricity, increasing by 6% since 2024¹.
- The U.S. Department of Energy estimates that on average certified green homes use 20-30% less energy than homes not certified².

Low-flow faucets and showerheads use about 30% less water than standard fixtures, saving residents hundreds of dollars each year on water and sewer bills³. While green certified homes may cost slightly more to build than code-minimum homes, those modest upfront investments result in lower energy and

¹ <https://www.jdpower.com/business/resources/average-household-utility-costs-rise-7-2025>

² <https://www.energy.gov/energysaver/leed-certified-homes>

³ <https://www.energy.gov/cmei/femp/best-management-practice-7-faucets-and-showerheads>

water bills over the life of the property. By removing third-party green building certifications from the DAS, the proposed standards shift a greater share of housing costs to residents through higher monthly utility bills and increased maintenance needs. For true housing affordability, it is important to consider both the cost to develop affordable rental housing and the cost for residents to live in it.

Improving Quality of Life

Quality of life has long been an important objective of OHFA's affordable housing program. Green building rating systems, such as the NGBS, provide a comprehensive framework for delivering homes that are not only energy and water efficient, but also healthier, more comfortable, and more durable. They recognize practices that improve indoor air quality, moisture management, occupant comfort, and the overall living environment.

The proposed 2027 DAS removes green building certification, eliminating a proven framework for delivering these resident benefits. As a result, future affordable housing developments may not consistently deliver the same level of performance and quality that residents of previously funded communities have come to expect. Retaining green building certification within the architectural standards will help ensure that affordable housing continues to support the health, comfort, and well-being of Ohio residents.

Value of Green Building Verification

Third-party green building certification provides an independent, objective process for verifying that affordable housing projects achieve the level of quality and performance expected by the DAS and QAP. Accredited verifiers conduct multiple on-site inspections throughout construction, confirm compliance with the certification program requirements and identify deficiencies before they become long-term problems for building owners and residents.

This independent oversight complements—not replaces—the work performed by local building officials. Building departments verify compliance with the adopted building code, while third-party green building verification evaluates additional measures related to building performance, energy efficiency, durability, indoor environmental quality, and resident comfort. Together, these processes provide greater confidence that publicly funded housing will perform as intended.

The value of this additional oversight is well documented. SK Collaborative's case study, [*The Value of Third-Party Inspections*](#), prepared for the Georgia Department of Community Affairs, illustrates how third-party verification identified deficiencies that would otherwise have remained hidden, including inadequate air sealing, mold growth, improper insulation installation, and missing HVAC filters. Correcting these issues during construction helps avoid higher operating costs, unnecessary maintenance, reduced building performance, and poorer indoor environmental quality for residents.

Removing third-party green building certification from the architectural standards would eliminate this additional layer of accountability and quality assurance for future affordable housing developments.

National Green Building Standard Overview

NGBS Green Certification is based on the National Green Building Standard (NGBS), the only residential green building standard approved by the American National Standards Institute (ANSI). Developed through a consensus process led by the International Code Council (ICC) with broad industry participation, the NGBS reflects nationally recognized best practices for residential construction.

Unlike programs that focus primarily on a single aspect of building performance, the NGBS evaluates projects across multiple categories, including site development, resource efficiency, energy efficiency, water efficiency, and indoor environmental quality. To achieve certification, every project must demonstrate minimum performance across each category, ensuring a balanced approach to building performance rather than excellence in one area at the expense of another.

Because the NGBS was developed specifically for residential construction and is written in code language familiar to builders, designers, and code officials, it is both practical to implement and well suited for affordable housing developments. Combined with independent third-party verification, NGBS Green provides OHFA with confidence that funded projects consistently deliver the quality, performance, and resident outcomes envisioned by the DAS.

Summary

Thank you for the opportunity to provide feedback on Ohio's Draft 2027 DAS. We request that OHFA return the requirement for third-party green building certifications to the 2027 DAS. Retaining third-party green building certification within the DAS will help ensure that Ohio's affordable housing continues to deliver homes that are affordable to operate, healthy to live in, and built to perform as intended.

We also request NGBS Green Certification be included within the 2027 DAS. The NGBS was designed specifically for residential construction and is cost-effective for affordable housing development.

I am happy to meet with you, or your staff should you require a more detailed overview of the NGBS or our certification program. Please do not hesitate to contact [Michelle Foster](#), our vice president of Sustainability, directly if she can be of further assistance.

I look forward to working with you to promote green certified affordable housing in Ohio.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Luzier". The signature is fluid and cursive, with the first name "Michael" being more prominent than the last name "Luzier".

Michael Luzier
President & CEO