



Draft Standards Comments - 2027 Design & Architectural Process Manual & Standards

June 29, 2026
Jennifer Cahill
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Dear Jennifer,

JKLM Architects, Inc. appreciates the opportunity to comment on the 2027 Design & Architectural Process Manual and Standards. Our team has reviewed the draft materials and offers the following comments for consideration. Additionally, we endorse the recommendations made by the Ohio Housing Council.

Architectural Submission & Review Process

In recent years, particularly for projects in more urbanized areas, it has been our experience that the current timeline for the 80% drawing submission can be difficult to achieve. Once a project is awarded, several critical due diligence items often need to be completed before the architectural team can meaningfully advance the drawing set. These items may include soil borings, ALTA surveys, community engagement, municipal architectural review, zoning coordination, and related site-specific evaluations.

While significant effort is made prior to preliminary application to understand project constraints, certain conditions cannot be fully evaluated until tax credit awards are secured and current technical information is available. We recommend that the manual acknowledge these timing realities and provide additional flexibility for the 80% submission schedule where appropriate.

Similarly, permitting timelines have become increasingly extended in many larger jurisdictions due to staffing limitations and increased permit volume. Timely receipt of OHFA review comments is critical to allow the project team to incorporate comments into the permitting set and maintain the overall project schedule.

Required Documents - Preliminary Architectural Submission:

We recommend clarifying or revising several preliminary submission requirements to better align with the level of information typically available at this phase:

- **Scope of Work:** In our experience, the scope of work is typically prepared by the contractor or developer team. We recommend moving this requirement to the QAP or clarifying that it is not the responsibility of the architect unless specifically included in the architect's scope.
- **BOMA Color-Coded Drawings:** We recommend removing this new requirement. It appears to duplicate information already provided in the floor plans, unit plans, cover sheet, DCF, and AHFA, while adding additional exhibit preparation time.
- **Site Details:** We recommend eliminating or clarifying this requirement, as there does not appear to be a consistent interpretation of what is expected.
- **Typical Wall Sections:** We recommend removing this requirement for new construction at the preliminary phase. The project is intended to be designed in accordance with applicable energy code requirements, whether through a prescriptive or performance-based approach.



- **HVAC/MEP Information:** We recommend removing this requirement from the preliminary architectural submission, as equipment selection is typically not finalized at this phase.
- **Submission Format:** Please confirm whether the 11x17 hard copy requirement has been removed and whether a 24x36 PDF drawing set is acceptable.

Required Documents - Final Architectural Submission:

For final submissions, we recommend clarifying the architect's responsibility relative to documents prepared by others. The architect may provide information to support the AHFA, Scope of Work, DCF, and drawing package; however, the architect is not always privy to all versions of those documents and is not positioned to confirm consistency across documents prepared or maintained by the developer, contractor, or other team members.

Please also confirm whether the 11x17 hard copy requirement has been removed and whether a 24x36 PDF drawing set is acceptable.

In addition, the sections titled "Additional Documentation Required for HOME & NHTF" and "Construction Completion" appear to include items that are generally outside the architect's scope of services. We recommend clarifying whether these requirements are the responsibility of the developer, contractor, or other designated team member.

2027 Design & Architectural Standards

General Comments:

Several sections reference compliance with building code, ADA, FHA, and related requirements. Because projects are already required to be designed in accordance with applicable codes and regulations, these references may be unnecessary unless OHFA is identifying a specific standard that exceeds baseline code requirements.

We agree that Section 504 compliance should remain a requirement. Incorporating Section 504 criteria from the outset supports better coordination and helps projects remain adaptable if additional HUD-related funding sources are introduced later.

The separation of requirements for New Construction/Adaptive Reuse and Rehabilitation is helpful. We recommend confirming that all Adaptive Reuse references are located within the New Construction/Adaptive Reuse section, including the reference on page 21, R3.

Additional Features for 504 Mobility Units:

Columns A1 and A2 appear limited in available options and may be cost-prohibitive for some project types. We recommend considering whether the columns can be reorganized by feature type, such as kitchen features, bathroom features, common area features, and similar categories. This may allow project teams to provide meaningful accessibility enhancements while better aligning selections with project scope, resident needs, and budget considerations.

Guidelines for New Construction:

We recommend revisiting several requirements to allow greater flexibility for a range of housing models and adaptive reuse opportunities.

Requirements that prohibit SROs, limit senior developments to two-bedroom units, or establish minimum efficiency unit sizes may unintentionally limit creative and viable housing solutions. Examples may include:



- Former nursing homes converted into SRO units for permanent supportive housing;
- Three-bedroom units in senior developments designed for intergenerational housing; and
- Former hotels converted into studio apartments.

We also recommend removing references to requirements that are already governed by code. For example, N3.4.1 notes that elevators are required when new construction exceeds three stories; however, this is already addressed through applicable code requirements.

For compact and efficient units, especially in urban areas, minimum bedroom sizes can result in disproportionate unit layouts where an excessive amount of area is allocated to bedrooms at the expense of living space. We recommend allowing more flexibility where the overall unit design improves functionality for residents.

The adequate storage requirement should be scaled to unit size. For example, a studio unit should not be subject to the same kitchen cabinet requirement as a three-bedroom unit.

In family developments, there is often a preference for tubs. We recommend reconsidering N3.5.3, which requires all 504 mobility units to include one roll-in shower, or allowing flexibility based on unit type and resident population.

Where minimum clear width is required for doors, we recommend specifying that the requirement applies to passage doors.

Within the Durability section, we recommend reconsidering certain prohibited or limited materials, as several products and assemblies have improved significantly in recent years. For example:

- Consider allowing drainable EIFS systems, with reinforced assemblies at the ground level. These drainable systems have substantially improved performance and durability over problematic predecessors, and for many existing legacy structures originally built with uninsulated masonry bearing walls, the addition of EIFS can be one of the only options to enhance the thermal performance of the building envelope within the scope of a moderate rehab.
- Consider allowing metal grid systems for thin brick.
- Apply similar standards to manufactured stone where appropriate.

The requirement for solid wood cabinet doors and fronts may limit the use of durable and cost-effective cabinet systems commonly used in affordable housing. We recommend adding “or equivalent” after the ANSI A161.1 requirement to allow comparable products that meet performance expectations.

We agree that sections N3.9.2.8 and N3.9.3 reflect good practice.

We also recommend reconsidering the increased mounting height for outlets, phone jacks, and data ports. A 15-inch mounting height is preferred; 18 inches can be high in some residential applications.

Guidelines for Rehabilitation:

Several of the comments noted above for new construction also apply to rehabilitation projects. In general, rehabilitation requirements should allow flexibility to respond to existing building conditions, project scope, and cost-effective resident improvements.

We recommend eliminating or qualifying requirements related to minimum unit sizes, storage requirements, minimum bedroom sizes, and counter “landing zones” for rehabilitation projects. These



criteria may be appropriate for substantial rehabilitation projects where units are being fully reconfigured, but they can be difficult to apply to moderate rehabilitation work where the goal is to improve functionality within existing constraints.

The attic insulation upgrade requirements may also present challenges in existing buildings where there is no energy heel or limited available space. We recommend allowing flexibility based on existing conditions and the recommendations of the project's energy consultant.

For large-scale rehabilitation projects, we recommend considering whether PTAC units may remain where they are newer, in good working order, and appropriate for the project scope.

Finally, we recommend adding qualifiers such as "where modified," "where applicable," or "where practical" to certain rehabilitation requirements. For example, requirements such as R4.9.4.2 and R4.10.2.5 would benefit from flexibility where existing conditions limit strict application.

In Conclusion

We appreciate the opportunity to provide feedback and hope these comments are helpful as OHFA continues to refine the 2027 Design & Architectural Process Manual and Design & Architectural Standards.

Please feel free to reach out to us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Meg Kavourias', with a stylized flourish at the end.

Meg Kavourias

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