



June 29, 2026

Ms. Barbara Richards, Director of Multifamily Housing
Ms. Jennifer Cahill, Architecture and Construction Section Chief
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

Regarding: 2027 Design and Architectural Standards (DAS) - Draft May 2026 & 2027 Design & Architectural Process Manual (DAPM) - Draft May 2026

Dear Barbara and Jennifer:

WJW Architects has reviewed OHFA's May 2026 drafts of the "2027 Design and Architectural Standards" (DAS)" and "2027 Design & Architectural Process Manual (DAPM)," and we are writing to submit public comments on the 2027 Draft DAS. While we have reviewed both documents, our comments are specific to the 2027 DAS Draft, as we did not have any comments or questions on the 2027 DAPM Draft.

We appreciate the opportunity to provide input, and we share OHFA's goal of providing high-quality, dignified affordable housing, including assisted living, to Ohio residents. WJW Architects not only has extensive real-world experience in the design of numerous affordable family housing, permanent supportive housing, and assisted living communities throughout the Midwest but is also nationally recognized for our expertise in researching, understanding, and designing for the specific health, wellness, and lifestyle needs of seniors.

Thank you for OHFA's consideration of the attached comments as your team works to finalize the 2027 DAS and DAPM. It is our professional opinion that reasonable modification to the standards as proposed would provide clarity for development teams and ultimately benefit residents and on-site operations, while keeping Ohio's affordable communities in line with national and regional affordable development standards.

Sincerely,

A blue ink signature of Michael Jerabek.

Michael Jerabek, AIA
President

A blue ink signature of Todd Wiltse.

Todd Wiltse, AIA, LEED AP
Partner

A blue ink signature of Michelle Sablack.

Michelle Sablack, AIA, EDAC, LEED AP
Partner

G. GENERAL REQUIREMENTS

G1. Introduction > Applicability

1. **Draft Language** – *“**Italic blue text within the guidelines identifies requirements that are specific to Affordable Assisted Living (AAL), and apply to AAL projects in addition to all other standards.**”*

Proposed Revision – “Italic blue text within the guidelines identifies requirements that are specific to Affordable Assisted Living (AAL), and apply to AAL projects in addition to all other standards. The Italic blue text within this document replaces the 4% LIHTC Affordable Assisted Living Guidelines, dated November 20, 2024” – or – “...The Italic blue text within this document is in addition to the 4% LIHTC Affordable Assisted Living Guidelines, dated November 20, 2024.”

Comment: We see that select requirements for Affordable Assisted Living are layered throughout the draft 2027 DAS, and we recommend clarification if the Affordable Assisted Living Guidelines are now consolidated into this standard, or if the separate Affordable Assisted Living Guidelines will remain in effect and/or be updated as well.

G5. OHFA Accessibility Requirements > Additional Features for 504 Mobility Units

2. **Draft Language** – *“In addition to following the requirements of the project’s selected accessibility standard for Section 504 compliance, applicant must select the indicated number of additional features from each column to provide in all 504 Mobility units (including units in addition to the federally required 5%):”*

Proposed Revision – “In addition to following the requirements of the project’s selected accessibility standard for Section 504 compliance, applicant must select the indicated number of additional features from each column to provide in all 504 Mobility units (including units in addition to the federally required 5%). The previous Appendix A: Universal Design Features no longer applies” or “...Appendix A: Universal Design Features are still required for all units in addition to these Additional Features for 504 Mobility Units, and the appendix can be found [insert location here].”

Comment: We observed that the previous Appendix A: Universal Design Features is not present in the 2027 Draft DAS and request clarification if this section is intended to replace Appendix A, or if Appendix A will still apply.

3. Draft Language – “Column A1 – pick one”

Column A1 – pick one
Range/cooktop does not exceed nominal 34" in height
Oven with side-opening door
Auto operator at unit entry
Entry door with fob/card reader, key pad, or lock box for easier caregiver entry
Stair lift (in multi-story units)

Proposed Revision – Add additional AAL options (or just more options generally that could apply for AAL). Some potential examples include: Wider Unit Kitchenettes for better maneuverability (minimum 4" wider than typical units) or a Night Light in Unit Bathrooms

Comment: In Affordable Assisted Living (AAL) units, the options are limited to only (2) in this column, given most will not have ranges/cooktops or ovens installed, and most AAL units will not be multi-story units. The two options remaining (Auto operators at entry doors and/or entry door access control) could present a cost burden on AAL projects specifically. We recommend expanding this section to ensure AAL communities have multiple options comparable to other OHFA communities.

4. Draft Language – “OHFA will accept proposed accessibility features beyond the provided list that are relevant and necessary to the applicant’s development. The applicant will be required to clearly describe the additional feature(s) and provide justification for the comparability in cost and value to the other items in the column. The evaluation, acceptance, and classification of these items is at OHFA’s discretion.”

Proposed Revision – “OHFA will accept proposed accessibility features beyond the provided list that are relevant and necessary to the applicant’s development, through an exception request. The applicant will be required to clearly describe the additional feature(s) and provide justification for the comparability in cost and value to the other items in the column. The evaluation, acceptance, and classification of these items is at OHFA’s discretion.”

Comment: We appreciate OHFA’s willingness to consider other accessibility features that might be better suited to the individual project, and we recommend that how this consideration will occur be specified in the DAS language. The above proposed language assumes this would be through an exception request but could be modified based on OHFA’s vision for how these requests should be submitted.

N. GUIDELINES FOR NEW CONSTRUCTION

N3. OHFA Design Requirements (New Construction)

N3.2 Building Design > N3.2.1

5. *Draft Language – “The maximum common area, using the Common Space definition for what constitutes common area, must not exceed 20 percent of the total gross building square footage.”*

Proposed Revision – “The maximum common area, using the Common Space definition for what constitutes common area, must not exceed 20 percent of the total gross building square footage for projects other than AAL. Dedicated Program Space, combined with Common Area space, shall not exceed 50% of the total gross building square footage for AAL properties.”

Comment: As mentioned in our previous public comment response to the Affordable Assisted Living Guidelines in 2024 when they were under development, WJW Architects has an extensive portfolio of affordable assisted living projects, as well as market rate assisted living. In our experience, the nature of assisted living requires a greater proportion of program space and common space than standard housing to meet the dietary, health and wellness, and life enrichment needs of frail seniors. In addition, circulation spaces take up a larger proportion of overall building floor area, due to the mobility needs of seniors, as well as the concentrated patterns of use (queueing for meals and other activities).

It should also be noted that assisted living resident units (sleeping units) tend to be smaller than independent senior dwelling units since part of the objective of assisted living is to get residents out of their units to socialize in the numerous, varied amenity spaces in the building. Therefore, the gross building area per resident unit in independent living and assisted living is similar; it’s just that the distribution of that area is more heavily weighted in amenity area in assisted living.

Generally, our portfolio of assisted living projects includes an approximate average ratio of 60% residential unit square footage and 40% total of program space, common space, staff space, circulation, and back-of-house service spaces. We recommend clarification be made for Affordable Assisted Living projects to better align with the current AAL Guidelines in this section accordingly.

N3.6 Kitchen and Appliances > N3.6.2

6. *Draft Language – “For Affordable Assisted Living, all kitchen appliances shall be 100% electric.”*

Proposed Revision – “For Affordable Assisted Living, all kitchenette appliances shall be 100% electric. Commercial kitchen equipment is permitted to be gas-fired.”

Comment: In our experience and based on the input from multiple Mechanical & Electrical engineering consultants, WJW does not believe that there is a cost-efficient way to design a 100% electric HVAC system for a commercial kitchen or large-scale dining room necessary for assisted living. Similarly, commercial-scale cooking equipment typically requires gas. We recommend this be clarified in the 2027 DAS language.

N3.9 Durability > N3.9.2.5

7. **Draft Language – “Windows and exterior doors must meet at minimum Version 6 (V6) Energy Star rating for climate zone 5.**

N3.9.2.5.1. Window manufacturer must provide a letter identifying number of windows provided to the project complying with Energy Star V6 and windows U-value, infiltration and wind speed rating per V6.

N3.9.2.5.2. HERS rater must certify those windows were installed on the project.

N3.9.2.5.3. Storefront windows that are not typically Energy Star rated should meet the U-value requirements for Energy Star V6 if possible.”

Proposed Revision – “Windows and exterior doors must meet at minimum ASHRAE 90.1 Standard at time of OHFA Application (i.e. -2019).”

N3.9.2.5.1. Window manufacturer must provide a letter stating compliance with the applicable ASHRAE 90.1 standard for all windows.

N3.9.2.5.2. HERS rater must certify those windows were installed on the project.

N3.9.2.5.3. Storefront windows shall be thermally broken with Low-E, Argon-filled glazing, and shall meet the applicable ASHRAE 90.1 Standard.”

Comment: Energy Star Version 6 (V6) for windows went into effect January 1, 2015, and generally is an outdated standard. Our office has experienced confusion from window suppliers and manufacturers around meeting an outdated standard for our Ohio projects under construction. We recommend updating this language for compliance with ASHRAE 90.1 Standard to better align with the OHFA DAS requirements for insulation, HVAC systems, and other energy efficiency measures. We believe that updating this to a current standard will create a clearer path for compliance for suppliers, manufacturers, and contractors. Additionally, most storefront systems cannot meet the Energy Star standard, and ASHRAE specifically addresses more achievable values for storefront systems that align with storefront products on the market.

N3.9 Durability > N3.9.2.7

8. **Draft Language – “Carpet must be solution-dyed nylon or equivalent solution-dyed high-performance commercial fiber. Olefin carpets are prohibited. If a pad is required, a closed-cell pad must be used with antimicrobial and water-resistant material. Carpet is only permitted in the following development types and locations:**

N3.9.2.7.1. Management and social service office areas;

N3.9.2.7.2. Bedrooms in residential living units (except for PSH);

N3.9.2.7.3. In senior developments and AAL, carpet is permitted in living/dining rooms if a walk-off area is provided at exterior and entry doors.

N3.9.2.7.4. In senior developments and AAL, carpet tile is permitted in corridors if applicant presents a plan for quarterly professional cleaning.”

Proposed Revision – “Carpet must be solution-dyed nylon or equivalent solution-dyed high-performance commercial fiber. Olefin carpets are prohibited. If a pad is required, a closed-cell pad must be used with antimicrobial and water-resistant material. Carpet is only permitted in the following development types and locations:

N3.9.2.7.1. Management and social service office areas;

- N3.9.2.7.2. Bedrooms in residential living units (except for PSH);*
N3.9.2.7.3. In senior developments and AAL, carpet is permitted in living/dining rooms if a walk-off area is provided at exterior and entry doors.
N3.9.2.7.4. In senior developments and AAL, carpet tile is permitted in corridors if applicant presents a plan for quarterly professional cleaning.
N3.9.2.7.5 In senior developments and AAL, broadloom carpet is permitted stairwells if applicant presents a plan for quarterly professional cleaning.”

Comment: In WJW’s experience, many AAL operators prefer broadloom carpet in stairwells over resilient stairwell flooring options due to advantages in durability, slip resistance, and sound attenuation. Like the allowance for carpet tile in corridors if a quarterly professional cleaning plan is presented, we recommend an allowance for broadloom carpet in stairwells with the same cleaning requirement.

R GUIDELINES FOR REHABILITATION

R4 Sustainability

9. ***Draft Language – R4 Sustainability > “In addition to meeting all energy efficiency requirements as stated in the Ohio Building Code or Residential Code, all OHFA funded projects must meet the requirements of one of the below energy efficiency or green building certifications.”***

Proposed Revision – G6 Sustainability > “In addition to meeting all energy efficiency requirements as stated in the Ohio Building Code or Residential Code, all OHFA funded projects must meet the requirements of one of the below energy efficiency or green building certifications.”

Comment: We observed that there is only a Sustainability section under the Rehabilitation section in the Draft 2027 DAS, and we recommend clarifying if sustainability requirements are applicable for all projects, including New Construction. We anticipate that new construction will still be required to meet a third-party certification; otherwise, there may be undue burden placed on rehabilitation projects if they are required to achieve above-code sustainability, but new construction projects are not. If there are intended Sustainability requirements for New Construction, this could be clarified by moving the Sustainability section to G General Requirements or creating a similar N New Construction Sustainability section in addition to the R4 section in the draft standards.