

June 29, 2026

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Dear Ms. Cahill,

On behalf of the Ohio Housing Council—the statewide association representing the developers, architects, syndicators, lenders, and other professionals who finance, design, and build affordable housing across Ohio—thank you for the opportunity to comment on the first drafts of the *2027 Design & Architectural Standards (DAS)* and the accompanying *2027 Design & Architectural Process Manual (DAPM)*.

OHFA's engagement on this rewrite has been both genuine and substantial, and we want to publicly express our appreciation. The Agency held stakeholder meetings across the state this spring, brought relevant staff to those sessions, and committed to rebuilding the standards from the ground up rather than patching what existed.

OHC responded in kind. We convened a taskforce of the developers and architects who work within these standards every day. We built a thirteen-criterion evaluation framework, which we shared with OHFA in advance, and we applied it to every provision in the draft. We met four times for close to ninety minutes each time (as opposed to the one meeting lasting less than an hour that is far more typical). Few documents have more influence on what gets built in Ohio, at what cost, and how many Ohioans ultimately have a place to call home. We treated it accordingly.

While OHC believes that existing codes and regulations should be the primary means of ensuring affordable housing is built safely, accessibly, and efficiently, we have never disputed that an OHFA-adopted design standard serves a real purpose. The competitive pressure inherent in the housing tax credit can reward cutting corners. Without a floor, that pressure invites a race to the bottom that harms residents, communities, and the program's credibility. OHFA put the point well in its own preview of the rewrite: the standards should function like bumpers in a bowling lane, there only to keep a project out of the gutter and invisible to any developer who avoids the bumpers on their own. A good developer should never feel the DAS. Our only issue with this metaphor is that we didn't think of it first.

The trouble is that the existing DAS had already drifted well past that purpose. Think of it like a house that has been added onto over thirty years—a bathroom here, a garage there, a

game room, a laundry addition. Each addition probably made sense when someone approved it. But you end up with a floor plan nobody would design from scratch, with rooms in the wrong places, and a floorplan you wouldn't have built if you'd known from the start what you needed. At some point the most honest thing to do is bulldoze it and start over and admittedly, that isn't easy, but that is what OHFA promised, and it's exactly why OHC supported the ground-up rewrite.

This first draft did not deliver that. Much of the 2024 DAS is still here and, at the risk of mixing and over-extending the metaphors, the DAS bumpers are not just keeping the ball out of the gutter. They often try to force a strike, dictating a single path down the middle of the lane even when other approaches would reach the same result, or, more troubling, when something short of a strike would be perfectly acceptable. Put another way, many provisions reach well beyond a floor and instead prescribe preferred outcomes. Even the best developers will feel many of the provisions in the current draft.

It is difficult to overstate how much the DAS affects the cost of developing affordable housing, or how consequential this rewrite is. It is also critically important to remember that every requirement above the floor carries a price. Affordable housing already faces the perception that it costs too much to build, and OHFA, of all actors, should not add to that cost without a clearly stated rationale and a demonstrated benefit that justifies it. The arithmetic is unforgiving: every dollar a requirement adds beyond what its goal legitimately needs is a dollar that no longer goes toward housing an Ohioan. Too few drains, doors, or sidewalk inches is a problem; too many may be a quieter problem, but it is measured in the Ohio families who lose out on a home because of the increased costs.

The attached matrix records our analysis, scoring each provision against the thirteen criteria and color-coding it green, yellow, or red, so the Agency can see at a glance where the draft succeeds and where it falls short. The comments that follow are organized around four structural findings that recur across the document, followed by the provisions OHC affirmatively supports, then specific comments organized in the order the provisions appear in the standards, and a separate section on the Process Manual.

These comments are detailed but not all-inclusive. A provision-by-provision accounting would be longer still, but we believe the items below are illustrative of patterns that recur throughout the draft. If OHFA is concerned about the length of documents, so are we. The answer, though, is fewer provisions in the DAS, not fewer explanations of why that limited number of provisions earn their place in the next draft.

It is worth noting that we have not evaluated the provisions specific to Affordable Assisted Living. That program is new and rarely used by OHC's membership, so our taskforce did not

take it up, and neither this letter nor the attached analysis takes a position on those requirements.

Structural Findings

OHC found four structural problems that carry through the draft: 1) OHFA has not met the burden of justification, 2) comparability to the market, 3) preventing a race to the bottom, and 4) historic rehabilitation has no home. These are not failures of any single provision but rather the patterns that shape many of them.

OHFA Has Not Met the Burden of Justification

On more than one occasion, OHFA talked about the importance of stating the “why” behind the standards. We agree there is value in this: it gives the professionals who actually design and build affordable housing a chance to contribute their expertise and innovation to solving the problems OHFA has identified.

Across the draft, the single most consistent disconnect is also the one that makes every other evaluation harder: the standards rarely state the problem each requirement is meant to address. The framework OHC shared in advance asks the opposite. A provision that does not name its purpose cannot be tested for fit. Sometimes we can infer the problem OHFA is trying to solve. More often there is no way to say whether the provision is well-tailored, whether it is scoped to the projects that actually present the problem, or whether a less costly path would serve the same purpose, because the end is left unstated. The practical effect is to invert the burden. Rather than OHFA explaining why a requirement belongs, we’re left to argue against a requirement whose rationale was never given. Each requirement should arrive attached to the problem it solves.

This draft shows this is achievable, because in two places it does exactly that. The draft contains a clear, Ohio-specific statement of the lead-based paint hazard: more than a quarter of Ohio's housing predates the 1950 lead-paint bans, and roughly two-thirds predates the 1979 federal ban. This language was carried over word for word from the 2024 DAS. However, the rationale for the radon provisions was not brought forward, even though the radon requirements themselves were. We do not raise this to reopen this draft’s radon requirement, which OHC supports. We do so because the asymmetry is unexplained, and because it indicates that OHFA can write a clear problem statement.

The near-total absence of this “why” elsewhere is therefore a choice, not a constraint. The radon rationale should be restored, and the same discipline applied throughout, which will do two things: give the reader the “why” OHFA suggested in the stakeholder sessions, and, in the process, indicate to the Agency just how many of these requirements have none or a limited one, which is a sure sign the requirement is unnecessary.

A second example shows how it can and should work provision by provision. Standard N3.5.5 states that PLAM countertops may not have sharp ninety-degree corners "in case of a bathroom fall". It offers several ways to comply (a chamfer, a radius, or a modified profile) and then says explicitly that OHFA does not require any specific profile or dimension. It succinctly names the problem, leaves the means to the professional with safe harbors spelled out, and disclaims any single prescription. This is the right model. Furthermore, it supplies a usable test, one OHFA itself floated in proposing a DAS with explanatory commentary. If a requirement cannot be described succinctly, it's a signal that the requirement needs rethinking, rescoping, or removal.

The recommendation here is not to bolt boilerplate language onto two hundred provisions. It is narrower and more demanding. No requirement should end up in the second draft unless three questions have been asked and answered honestly, and the benefit is determined to be worth the additional cost:

1. What problem does this solve?
2. What does the requirement cost in dollars, in units, in flexibility foregone?
3. Is the benefit of the specific solution chosen worth that cost, not just in the abstract, but compared to what a less costly path would produce?

A rationale that names the problem but doesn't weigh the cost against the benefit hasn't completed the analysis; it has only started it. The test has to be allowed to fail a requirement, and our analysis suggests most of the provisions that exceed the market or the federal floor do not survive it.

OHFA said repeatedly in stakeholder meetings that architects and developers often have access to information about newer products and innovative techniques that can accomplish a given goal and that it wants a document that allows for the benefit of that knowledge and creativity. We agree, but we're not there yet.

Comparability to the Market

The most useful question to ask of any requirement that goes beyond code is a simple one: does the comparable market impose it? If the answer is no, it's worth asking why. Sometimes there is a sound, state-specific answer. More often it is a holdover from a previous version, and the effect is to drive the cost of developing and constructing affordable housing beyond comparable market-rate housing. That's the opposite of what a program designed to stretch scarce resources should want.

This is not an argument that OHFA should never exceed market practice. It is an argument that doing so should be a decision OHFA makes deliberately, with knowledge about the increased cost and an explicit determination that the benefit is worth that increased cost.

Several provisions fall prey to reaching past the market without that deliberation: five-foot sidewalks where the accessible-route standard and comparable housing call for less (N3.1.4), solid-core interior doors where market-rate housing uses hollow-core (N3.7.1.2), and an Energy Star V6 window specification at or near what the energy code already delivers (N3.9.2.5).

Our recommendation is to apply the test in earnest and let it reach a verdict. Where a requirement clearly exceeds the market, OHFA should state the Ohio-specific reason the market standard is insufficient. Sometimes that reasoning will exist and the requirement will earn its place. But for most of these provisions our analysis points toward bringing the requirement into line with what the comparable market already builds. Documentation alone won't be the fix; provisions have to be honestly evaluated and discarded if they do not survive it.

Preventing a Race to the Bottom

The comparability test has a built-in answer for many provisions, and it is the reason a design standard exists at all. The competitive scoring at the heart of the housing credit can reward the applicant who builds to the lowest cost. Left unchecked, that pressure produces exactly the race to the bottom the standards are meant to prevent. This finding is the complement of the comparability test. Comparability asks whether the market imposes a requirement; the race-to-the-bottom rationale supplies the reason OHFA sometimes should anyway. To put it more succinctly, OHC is not asking OHFA to abandon every floor. We are asking the Agency to keep the floors that prevent a genuine race to the bottom and to remove the ones that do not.

This draft contains clean examples of the principle done right. Take the solution-dyed nylon carpet requirement (N3.9.2.7). A developer optimizing for first cost would install surface-dyed or olefin carpet that loses color and wears out fast, and solution-dyed fiber resists both. That is a genuine durability floor, and OHC's taskforce, including the architects and developers who would bear the cost, agreed it is worth setting. The EIFS prohibition (N3.9.2.2) stands on similar ground, given a documented history of water-intrusion failure a least-cost approach would repeat, as does the new anti-patchwork completion standard in R5, which guards against the corner-cutting a least-cost rehab would produce. These are floors worth keeping.

The catch is that the draft says none of this. The rationale above is ours, not OHFA's; each provision imposes the requirement without naming the problem it solves. We support all three anyway, but the Agency should not have to depend on us to make its case. Stating the problem behind each would put the justification on the record, confirm these floors do the

race-to-the-bottom work we believe they do, and spare the next reader from guessing at the intent. A requirement worth keeping is worth explaining.

The principle also cuts the other way. The twenty-percent cap on common area (N3.2.1 and its rehabilitation counterpart, R6.2.1) is not a race-to-the-bottom guard. It is the reverse. Common space generates no rent, so a developer's own economics already push toward minimizing it. The cap therefore polices a problem the market already solves, and in rehabilitations it can actually penalize the sensible reuse of existing space, since any expansion of the existing footprint triggers the cap. We recommend removing both.

Historic Rehabilitation Has No Home in the Draft

This draft sorts every project into one of two boxes, new construction or rehabilitation, and folds adaptive reuse into new construction (N1). Historic rehabilitation fits neither box well and seems to have nowhere to live. The cost reality is the tell. A conventional 1990s-era facelift rehabilitation requires a hard cost in the tens of thousands of dollars per unit. Because historic work involves meeting preservation requirements that a conventional rehab never encounters, a scattered-site historic rehabilitation can climb well into six figures per unit. A standard written for the eighty-thousand-dollar project and applied unchanged to one that costs twice as much does not merely add cost, it can render the historic project infeasible, and Ohio loses the building.

OHFA has the right instrument, but it hasn't been scaled correctly. The draft accommodates historic work in two narrow places: the SHPO material exemption (R6.9.2) and the historic-tax-credit unit-size averaging carve-out (R6.3.1.2.2). Both are sound, and both should go further than the draft now allows. OHFA should commit in writing to coordinate with the State Historic Preservation Office, with the owner and design team at the table for those conversations, so that the OHFA requirements that can be met, will be, and where it cannot, the SHPO exemption widened beyond materials.

In the past, OHFA and SHPO have conferred and reached conclusions about projects without the owner or designer present. This creates cost and design challenges the project team is solely left to absorb. Those conversations should include all parties. The commitment should also account for SHPO's limited capacity, since that office is already stretched, and a workable, well-defined process matters as much as the commitment itself. For the most constrained and expensive projects in the pipeline, OHFA's willingness to help solve the problem matters as much as the exemptions do.

The right trigger is a project's use of a historic tax credit, and the draft is close to recognizing it. What sets these projects apart is not which credit funds them but the obligations a historic credit carries: SHPO review and the duty to replicate rather than replace in kind, which are the true cost drivers. The carve-out should therefore key on a

project's qualification for or pursuit of historic tax credits rather than their confirmed receipt, since the credits are not always locked at application. OHC's recommendation is therefore structural:

- give historic rehabilitation its own track, or a robust, document-wide carve-out;
- expand the SHPO exemption beyond materials;
- commit in writing to coordinate with SHPO, with the owner and design team in every conversation and with realistic regard for SHPO's capacity, so that requirements which can be met, will be met; and
- recognize that OHFA wants to review historic projects case by case to confirm each is scaled appropriately, and make that exception process predictable, quick, and consistent—clear up front about what OHFA is looking for—so the Agency keeps the input it wants without the review itself putting a workable historic deal out of reach.

What OHC Supports in the 2027 Draft

In some areas, this draft succeeds, and it is worth pointing these instances out. Some of this is simply credit due. But it is also evidence, because nearly everything we will suggest as improvements below is something OHFA has already done somewhere in this document. The discipline we ask for in a second draft is not aspirational, but rather a completion of what's already begun.

The clearest example of OHFA's receptiveness is the removal of the paperless gypsum requirement, now replaced with moisture-resistant gypsum board (N3.9.2.8). Developers and architects raised this at every input session this spring, and since OHFA heeded that advice, we have a more usable provision. That is a visible response to consistent industry feedback.

The sustainability section shows the same responsiveness. R4 now requires only that a project meet a green certification's requirements, verified by a HERS rater, with the certification itself recommended rather than required. That removes a real cost and process that did not add value, without surrendering the underlying performance, and still gives developers a choice. OHC supports it. Several other provisions moved in the same cost-conscious direction: the efficiency-unit minimum dropped from 450 to 400 square feet (N3.3.1), the old prescription that interior doors measure 36 inches to deliver 32 inches of clear width was dropped (N3.7.1.1), and interior-door material options were broadened (N3.7.1.2). Individually, none significantly move the needle, but together they do and it shows an Agency willing to let go of real cost where there was marginal benefit.

Second, where OHFA names the problem, the drafting works, and a few provisions are good enough to serve as templates for the rest. The lead-based paint requirement (R2)

carries a robust, Ohio-specific problem statement alongside clear federal cross-references and explicit exception paths. And the door-hardware provision (N3.7.1.3) contains a small but instructive piece of good drafting. For doors without latches or locks, it asks only that the hardware be "easy to operate with one hand." While the provision still doesn't name the problem it is trying to solve, naming the outcome rather than dictating the mechanism is a great example of what we are asking for throughout.

Third, OHFA has shown it can differentiate by project type. The draft already tailors several rehab provisions to existing-building reality. A 24-inch range is allowed in rehab where new construction requires 30 (R6.6.1.1). Interior-door upgrades are triggered only "if replaced" rather than universally (R6.7.1.1). Existing door widths "may remain as is" except for mobility units (R6.7.1.2). And the kitchen landing-zone dimension drops from twelve inches to nine (R6.6.4). Each is real tailoring, not a relabeled copy, and each shows that the historic carve-outs OHC requests sit well within OHFA's drafting range.

The clearest new example is the Section 504 unit-count options. General-occupancy and rehab projects now have a semi-ambulatory pathway (Option B) and a flexible pathway (Option C), which lets a developer design to the population actually served rather than to a single fixed count.

We also support OHFA's decision to apply Section 504 to every project it funds, not only those drawing federal dollars. That is an appropriate use of the Agency's authority, and it matches how projects actually evolve: developers routinely add funding sources after design begins, and the moment any HUD money lands, the project is designed to Section 504 anyway. The standard it brings is the right one. Ohio Building Code requires only two percent of units to be built as Type A or accessible, which is not enough, while Section 504's five-percent mobility standard better fits what the industry actually needs. We would note, however, that our support here reflects our own reasoning, not a rationale OHFA supplied. The second draft should carry a brief statement of why universal application is warranted, the same discipline we ask of every other provision.

OHFA can state problems, write performance standards, differentiate by project type, and set defensible floors, because it has already done so in this draft. The recommendations below ask only that it do so consistently.

Comments on Individual Provisions

Many of the concerns below share a single remedy: where a provision does no more than restate the building code or federal law, OHC recommends removing it and relying on the cross-references already in G3 and G4. There is no need to restate a requirement another authority already enforces; doing so adds review time, cost, and exception-request risk without adding additional protection. When two reviewers disagree, the developer bears

the cost of resolving the conflict, without any benefit to the resident the requirement was meant to protect. Our recommendations run in the same order throughout:

- Delete where the requirement earns nothing
- If kept, fix by narrowing
- If OHFA means to exceed code, state the problem solved and weigh against fewer resulting units

There is a second remedy that is often appropriate as well. Where a provision reflects an OHFA preference for something higher than the floor (rather than a guard against something worse), it does not belong in the DAS. If OHFA wants these kinds of features, the QAP's competitive scoring is the place. But one caution with that recommendation: because applications are scored competitively, developers pursue every available point, so some scoring items are de facto requirements unless OHFA builds in enough alternative ways to earn the same points. The QAP is the right home for a genuine preference, but only if it is structured so that no single preference becomes a back-door mandate.

With all of the above as background and context, we offer the following comments on the specific items in the draft DAS:

General Requirements (G4-G5)

G4: Section 504 mobility units, “maximum extent feasible”

OHFA restates the federal mobility-unit requirement, but not verbatim: it drops the “maximum extent feasible” qualifier that federal law attaches. That qualifier exists to keep a small project or a constrained existing building from being held to a target it cannot physically reach, and dropping it turns a feasibility-bounded standard into a hard mandate, which in a tight rehab or a historic building is the difference between compliance and a stack of exception requests. Delete the provision and rely on G4's incorporation of the federal standard, which already carries the qualifier. Keeping the federal language is not a weakening of accessibility; it is a return to it.

G5: Number of 504 mobility units

OHFA requires ten percent mobility units where federal law sets five. The higher figure may be defensible, and HUD allows more on a demonstrated need, but the draft gives no reason for it. At the Columbus session OHFA staff acknowledged the earlier move from five to ten percent could not be statistically justified for general occupancy and that one size does not fit all. State the Ohio-specific reason ten percent is needed where federal law sets five percent, weigh its added cost, and extend the Option B and C flexibility to the project types that do not yet have it.

G5: Additional features for 504 mobility units

The mandatory feature columns are preferences, not floors, and OHFA's own framing concedes it: the draft explains the features exceed the federal minimum because, in the Agency's judgment, the minimum is not enough. The cost compounds the problem. Column A2 alone can force a second elevator, a permanent generator sized to power it, or whole-building costs reaching into the hundreds of thousands of dollars, which can crowd out the accessibility investments that would actually help a given building's residents. The Universal Design features developers have chosen for years on the current Design and Construction Features form align with Column C and carry far more manageable costs. Move the additional features to the QAP as scored incentives, where a developer can pursue the highest-value features for the population actually served rather than buy fixed selections, the most expensive whole-building items included, to clear an arbitrary floor.

G5: Sensory unit requirements

The hard-wired doorbell is more prescriptive than ANSI, which lets the communication function be met through a range of technologies, and hard-wiring is often complicated in rehabs. The 180-degree peephole, the audio-visual notification in all habitable spaces, and the new sleeping-area deactivation control all appear to exceed the ANSI sensory baseline. Align these to ANSI, state any above-standard basis, and fix the rehab applicability.

New Construction (N3)

N3.1.1: Proposed sites

The provision applies a Project-Based Voucher site-selection standard, mis-cited as "24 CFR 988.55(e)" and apparently intending 24 CFR Part 983, to all new construction. For PBV projects, federal law already applies it, so restating it adds nothing. For non-PBV projects, applying a PBV-only standard is an expansion beyond the rule's federal scope with no stated basis. Remove the provision. If OHFA has an Ohio-specific reason to impose a site standard on all new construction, that is a new requirement and should be written and justified as one.

N3.1.4: Sidewalk width (and rehab counterpart)

The current accessible-route standard (ANSI A117.1-2017) sets the minimum exterior accessible route at 48 inches. OHFA requires 60. That additional foot, carried continuously along every route, adds cost without a stated reason or any showing that the benefit justifies it. Conform the requirement to the 48-inch exterior accessible-route standard or state the Ohio-specific reason the additional width is needed.

N3.2.1: Common-area cap (and rehab counterpart R6.2.1)

The twenty-percent cap on common area does no race-to-the-bottom work. While we recognize and appreciate that OHFA has changed the definition of what counts as common

space which makes it easier to meet the twenty-percent cap, the reality is that common space generates no rent, so a developer's own economics already minimize it; developers don't gain from wantonly increasing common area space. In rehab the cap is worse, because it is triggered by any footprint expansion and so penalizes the sensible reuse of existing space. Remove both the new-construction cap and its rehab counterpart.

N3.3.1, N3.4.1: Unit and bedroom size minimums (and rehab counterparts)

The draft sets minimums twice, once for the unit and again for the bedrooms inside it, and the two pull against each other. A 550-square-foot one-bedroom that must also contain a 120-square-foot primary bedroom has 430 square feet left for kitchen, bath, living, storage, and circulation, leaving the designer to either inflate the unit beyond its minimum, which is pure added cost, or squeeze the rest of the unit. In rehabilitation, and most acutely in historic rehabilitation, the existing structural grid is fixed, so reaching a bedroom minimum may mean moving a wall the budget never planned for, or one historic status forbids. The predictable result is exception requests.

The developers who do this work report bedroom-size exceptions among the most common they file, each one staff time for OHFA, delay for the developer, and uncertainty for the deal. OHFA already recognizes this bind in one place: the historic-tax-credit averaging carve-out for one-bedroom units (R6.3.1.2.2). OHC asks OHFA to set these minimums for rehabilitation and historic projects at a level that keeps the exception process focused on the genuinely hard calls, rather than filling it with the predictable conflicts that come with most old buildings. For new construction the numbers can largely stand, but the bedroom minimums need a stated cost-benefit basis, and OHFA should reconsider whether the 400-square-foot efficiency floor forecloses the micro-unit and supportive-housing models that serve the lowest-income Ohioans. Resolving this bind would eliminate what is otherwise likely the largest single source of exception requests in the document.

N3.3.2: Single-room-occupancy prohibition (and rehab counterpart R6.3.2)

The draft flatly bans SRO units and gives no reason. An SRO is not a defective studio; it is a distinct, federally defined housing type for a single person, built for the very-low-income adult and persons exiting homelessness, and federal policy recognizes and preserves it. The ban states no problem, prevents no race to the bottom, blocks one of the most natural uses of historic hotels and rooming houses, and steers the same dollars toward fewer, costlier units. Remove the prohibition from both N3.3.2 and R6.3.2. If OHFA prefers full studios as a matter of policy, that preference belongs in the QAP's scoring, not a categorical ban.

N3.4.3: Double occupancy in three- and four-bedroom units.

The provision requires three- and four-bedroom units to "support double occupancy in each bedroom," but what double occupancy takes in practice, the egress, window size, and square footage, is set by local zoning and building code, which varies by jurisdiction and in some places may limit occupancy below what the provision contemplates. As written, it is unclear whether OHFA is simply restating local code, which would not add anything, or imposing a specific design parameter it has not named. State the parameter directly, such as a bedroom size sufficient for two beds, or remove the provision.

N3.5.3: Roll-in shower mandate (and rehab counterpart)

Federal accessibility law already requires an accessible shower in every 504 mobility unit and lets the designer meet it with either a roll-in shower or a transfer-type shower with a seat. Both are fully accessible, and the choice is one federal law deliberately leaves open. Mandating the roll-in forecloses the transfer-type option without making a single unit more accessible, and the cost is real and concentrated in rehab, where a roll-in means structural floor work, new drainage, and threshold elimination. In historic reuse, where the bathroom geometry may itself be historically protected, it can be outright infeasible. Remove the provision. G4 already incorporates the federal standard, which still requires an accessible shower by either of two means. If OHFA wants the document to flag it, cross-reference the federal standard while preserving the choice, one roll-in or one transfer-type shower with seat per ANSI A117.1-2017 §608.

N3.6.3: Kitchen venting (and rehab counterpart R6.6.3)

The provision directs kitchen exhaust to the outdoors. The residential and mechanical codes permit a listed ductless range hood where mechanical or natural ventilation is otherwise provided, and the vent-to-outside mandate removes that option. The cost falls hardest where a duct to the exterior is most difficult: interior units and high-rise, where venting may require a vertical shaft running up through the building. Permit the listed ductless option the building code already allows where other ventilation is provided.

N3.6.4: Kitchen landing zone (and rehab counterpart R6.6.4)

The cost of a per-appliance landing zone is footprint, not material. Clear counter on each side of two appliances makes the kitchen longer, and because the unit-size minimums are floors, the unit itself must grow to absorb it, driving up cost per square foot rather than only shrinking the other rooms. Developers at the Columbus session described compact-unit kitchens swelling until they consumed close to a fifth of the living area, and a single each-side dimension applied from efficiency to four-bedroom treats all kitchens as if they were the same. A cleaner approach surfaced in OHFA's own session: specify a minimum total linear footage of usable countertop scaled by bedroom count, keeping the sharing flexibility and microwave allowance the draft already gets right. That guarantees a real

working kitchen, scales with unit size on its own, and lets the designer place the counter where the unit can carry it. For historic rehabilitation, where existing kitchen geometry often cannot be reconfigured at all, the requirement should yield through the historic carve-out described above.

[N3.7.1.2: Solid-core interior doors \(and rehab counterpart R6.7.1.1\)](#)

The requirement reaches past the market for a benefit the evidence does not support. Market-rate housing uses hollow-core interior doors as a matter of course; a contractor's analysis puts the solid-core material premium above \$300 per unit, and a supportive-housing developer put the all-in premium nearer \$500. According to the people who manage these portfolios, the durability case is not there, and one operator who is building in sixteen states noted Ohio is the only one of those requiring solid-core. Appendix C's Expected Useful Life framework already governs durability and replacement for doors as for everything else, so a separate material mandate duplicates a protection the document already provides. Remove the requirement and rely on the market and the Expected Useful Life framework. If OHFA keeps any version, preserve the rehab "if replaced" trigger, which other provisions should copy.

[N3.7.1.5: Door closing speed](#)

The five-second close requirement is familiar as a unit-entry-door standard, but it is nested in the interior-door section. Recategorize it, or clarify that the accessible route can include both interior and exterior doors, so its scope is unambiguous.

[N3.9.2.4, N3.9.2.5, N3.10.1.1, N3.10.2.1: Energy compliance](#)

Four provisions require energy performance the building code already governs: insulation and HVAC to ASHRAE 90.1, windows and exterior doors to Energy Star V6, and water heaters to ASHRAE 90.1. Each duplicates the energy code, and three also narrow it, because the Ohio Building Code (OAC 4101:1-13-01) allows compliance through either the IECC or ASHRAE 90.1 while these provisions name only ASHRAE 90.1 and foreclose the IECC path.

The water heater requirement shows how little the duplication buys, since no manufacturer still makes a unit below the code minimum. The window provision adds cost for a label: its U-factor matches what the code already delivers, yet it layers a HERS-rater certification and a manufacturer's letter on top of the architect's specification; three sign-offs for a level the building department already confirms. It also pegs the requirement to Climate Zone 5, but Ohio spans Zones 4 and 5, so as written it applies the wrong zone to the southern counties.

Delete all four and rely on the G3 code cross-reference. If any is kept, it must allow both ASHRAE 90.1 and the IECC ("as required by the Ohio Building Code" or "ASHRAE 90.1 or the

IECC" preserves the choice), and it should drop the HERS-rater and manufacturer-letter verification. If the real aim is performance above code, these provisions need a stated problem and a cost-benefit analysis weighed against the cost of fewer units, which the draft does not supply. One point of credit: tying compliance to the code version in effect at drawing submittal is the right reference point and should be kept.

N3.9.2.8: Moisture-resistant gypsum board

OHC supports the move from paperless to moisture-resistant gypsum board. Two refinements would tighten it: define "water source," since the open-ended phrasing implies the listed sources are not exhaustive, and add a sentence confirming this standard supersedes OHFA's May 2023 memo, which was issued outside the formal channel of the Design and Architectural Standards.

N3.10.3.2: Switch types

The provision requires rocker, touch, or hands-free switches and prohibits toggle switches, but ANSI A117.1 governs operable parts by reach and operation, and a standard toggle switch meets that test, since it can be worked with a closed fist. The accessibility floor is met either way, so the prohibition is an OHFA preference carrying a cost that adds up across every switch in every unit. At a minimum, remove the prohibition on toggle switches, although there is really no reason for this provision at all.

Rehabilitation (R)

R4: Sustainability (placement and scope)

The HERS-verified, certification-optional approach is a real improvement, credited above. Two structural points remain. The provision sits in the Rehabilitation section, yet it states that "all OHFA funded projects" must meet it, and the staff presentation to the Multifamily Committee indicated it does apply to all projects. Confirm the scope in writing and move R4 to General Requirements, where a document-wide standard belongs.

R5: Project completion standard

The anti-patchwork completion standard is a sound floor, credited above. As written, though, it can be read to require absurd results, such as a weather cover over a shelter. Tighten the language so it reaches the corner-cutting targets without allowing for more extreme readings.

R6.6.1, N3.6.1.3: Dishwasher

The appliance list opens "All affordable unit kitchens must include," then lists "An Energy-Star certified dishwasher (if provided)." A conditional sitting inside a mandatory-inclusion list reads as a contradiction; a unit cannot be required to include something only "if provided." The intent appears to be that a dishwasher is optional but, if installed, must be Energy Star certified. Clarify by stating it as a conditional standard rather than a mandatory

inclusion, for example "A dishwasher, if provided, must be Energy Star certified," placed outside the "must include" enumeration.

N1, R1: Adaptive reuse applicability

The applicability sections disagree on where adaptive reuse lives: N1 folds it into new construction, while R1 sweeps in "any existing building or space," which captures it too. Resolve where adaptive reuse belongs, in tandem with the request for a dedicated historic track above.

Document-Wide Drafting

Make qualitative requirements measurable

Several provisions set a standard in words with no metric: floor coverings "non-glare and slip resistant" (N3.8.2), the thermostat "easy to read and simple to operate" (N3.10.2.2), "adequate non-glare lighting throughout" (N3.10.3.1), and "anti-slip strips" on stairs (N3.8.3). These cannot be applied consistently, because two reviewers may read them two different ways. Attach a measurable standard or a named safe harbor to each; slip resistance has a coefficient, lighting has published IES levels, and for stair treads it would help to name acceptable methods (an aggregate finish, an anti-slip nosing overlay, or a rubber tread overlay). Where OHFA wants a true performance goal instead of a number, the PLAM corner provision (N3.5.5) is the model.

Use "must" and "should" deliberately

The draft mixes mandatory and advisory language with no clear rule: weepholes "should not be sealed" (N3.9.3.2), outlets "should be installed at least 18 inches" above the floor (N3.10.3.3), hardware "should be uniform in style" (R5). Decide for each whether OHFA means to compel or recommend, and use "must" or "should" accordingly. While fixing N3.10.3.3, note that the 18-inch height exceeds the 15-inch accessibility minimum and can collide with sills and framing, so it should track the ANSI standard rather than add to it.

Remove the code restatements

Under the first remedy above, provisions that only repeat another authority should come out: the 32-inch interior-door width (N3.7.1.1), the finish behind removable cabinets (N3.8.1), and the tub-and-shower anti-scald requirement (N3.10.1.2), though the sink anti-scald portion is a genuine OHFA addition that can stay if it is justified and judged worth the cost of fewer units. The energy restatements above belong here too. Remove them and rely on the G3 and G4 cross-references.

Requests for Clarification

N3.9.2.5: Window wind rating

The provision ties the wind rating to Energy Star V6, which measures energy performance, not structural wind load, so it is unclear whether a structural minimum is intended at all.

Wind loading also varies with a building's exposure and location, the load on a corner differing from a mid-wall and an urban site from a rural one, which is properly the structural engineer's determination. Clarify whether a structural wind-rating minimum is intended; if so, state it on its own terms and leave the design pressures to the structural engineer.

Leasing and occupancy obligations for accessible units

Developers report that in some markets the additional 504 units required by G5 can sit vacant. Federal law sets the baseline: an owner must market accessible units and take reasonable steps to maximize their use but need not hold a unit empty indefinitely. Clarify whether the DAS or Process Manual adds anything to that federal baseline, and what a developer's exposure is when an accessible unit cannot be filled despite a good-faith effort.

Comments on the Design and Architectural Process Manual

We appreciate OHFA's decision to consolidate submission requirements, review timelines, and the exception request process into a standalone Process Manual. This is genuinely useful. It's the kind of document architects and developers pass along to project teams at the start of an OHFA engagement. The intent is right. But the document as drafted has significant gaps, and in a few places, it reaches well beyond its appropriate scope.

Review Deadlines and Consequences

The Process Manual does not impose any defined timeline on OHFA to complete its review of submitted documents. This is its most significant deficiency.

We recognize that OHFA is actively working to improve its internal review process, and we support that effort. **But process improvements and enforceable deadlines are not substitutes for one another.** They serve different functions. Deadlines are precisely what you need when a process is unreliable. Once the process is working well, deadlines don't hurt anyone. They simply confirm what's already happening. Right now, when projects are being held up because reviews aren't completed in time for applicants to incorporate comments before financial closing, deadlines matter enormously.

The consequences of delayed review are not abstract. Permit sets and construction budgets are finalized well before closing. Comments that arrive too late to influence those documents become change orders, adding cost, creating friction with lenders and investors, and sometimes requiring completed work to be redone. OHFA imposes firm, specific deadlines on applicants throughout the process: respond to every noncompliance item with corrected drawings, contact OHFA's architectural staff on any outstanding item at least sixty days before construction, notify OHFA of any exception request within thirty

days, and complete review before construction can begin. Applicants should be able to rely on reciprocal commitments from OHFA.

We recommend the Process Manual establish defined review windows keyed to specific submission milestones, with a deemed-approval provision when OHFA fails to respond within the stated timeframe. A workable target is a date certain 45 to 60 days before closing, which leaves applicants time to absorb any cost-related changes from OHFA's review before the documents are finalized. OHFA might also lean on the third-party inspector the construction lender and equity investor already engage, who could review against the design standards rather than duplicating that oversight, and a set schedule for OHFA's own inspections would let teams prepare for them.

The Appeals Process

The Process Manual introduces the concept of an appeal to the Director of Multifamily Housing when an applicant disagrees with a determination by OHFA's staff architect. We support the instinct here. Some pathway for appeal is important, and making clear that one exists sends a useful signal both to applicants and to staff.

The current language, however, is not sufficient. There is no defined path, no timeline, and no indication of what the appeal must contain or how it will be evaluated. That ambiguity creates uncertainty for applicants and leaves too much discretion with staff. We recommend OHFA develop a defined appeals procedure, including the form of an appeal, the timeline for OHFA's response, and the standard of review, and incorporate it into the Process Manual or a companion document.

The 80% Drawings Threshold

The 80% submission requirement generated more discussion among our taskforce members than almost any other provision. It boiled down to two related problems.

The first is structural. Firms routinely cannot produce a true 80% set by the required submission date. Site due diligence, municipal permitting, and engineering all continue well after an award is made, and most developers do not authorize design work to begin in earnest until they have secured the award. The result is that "80% drawings" often means something closer to 50%, which benefits no one.

The second problem compounds the first. We understand that OHFA sometimes does not begin reviewing submitted drawings for 60 to 90 days after the submission deadline. By that point the submitted set is outdated. OHFA staff ends up commenting on items that have already been addressed, or working from a version that no longer reflects the project. This wastes time on both sides.

One concept worth exploring: rather than requiring submission of printed drawings by a date certain, require applicants to submit only digital drawings by a specified date. Before OHFA actually begins its review, however, applicants would have a short window—three to five days after OHFA provides notice—to deliver the current digital and printed set. This eliminates the artificial rush to produce drawings by an arbitrary deadline and solves the version-control problem at the same time. OHFA reviews current documents, and applicants aren't penalized for continuing to work. There may be other approaches that achieve the same result and OHC would certainly be open to them as long as they accomplish two complementary goals: OHFA is reviewing current documents and applicants are not penalized for continuing to work.

Required Submissions: Scope Creep

Several items OHFA is now requiring at the 80% submission stage either don't belong at that stage or don't belong in the Process Manual at all.

Completed compliance verifications.

The draft requires applicants to submit "completed verifications" that the project complies with accessibility and energy efficiency requirements. This is not possible at the drawing stage. Accessibility and energy certifications are post-construction determinations made by qualified third-party reviewers. No architect or developer can provide a meaningful certification that a building meets these standards from a set of drawings and asking them to creates liability without adding any real assurance. Remove the requirement. OHFA's review of the drawings themselves, alongside the oversight already provided by lenders, investors, accessibility consultants, and energy raters is the appropriate check at this stage.

Legal documents.

Condominium documents and similar legal instruments are not available at the 80% submission stage and are entirely outside the architectural team's purview. Remove the requirement or provide justification for why they are actually needed.

Scope of work form.

The scope of work is a developer and budget document. It is already a QAP submission requirement. Including it here creates duplication, risks the two documents falling out of sync, and puts it in a document that the wrong team will be expected to complete. Each document should own its lane. Remove the requirement or state the specific reason why they should be submitted twice.

CAD/DXF files.

This requirement has been in place for years. We are not aware of any clear explanation of what OHFA does with these files, and our members report the same. Our recommendation is to state the specific use or remove the requirement.

Color-coded BOMA floor plans.

This is a new addition to the preliminary and final submission requirements. The burden is real. The benefit at the preliminary stage is not apparent. State the specific use at each stage or remove the requirement.

As a general principle, OHFA should be able to articulate a specific purpose for each item it requires applicants to submit. If a submission requirement cannot be justified by reference to a decision OHFA is making or an obligation it is fulfilling, it should be removed.

The Exception Request Process

The exception request framework in the Process Manual is an improvement over what existed before. The 30-day notification window and defined submission bullets give applicants a workable structure, and the ability to submit a retroactive exception request, even if rarely needed, is a useful addition.

Two things are still missing, however.

First, the Process Manual does not explain what makes an exception request meritorious. Approvals and denials have been inconsistent, and there is currently no way for an applicant to predict how a request will be evaluated or to learn from how past requests have been handled. This is not a minor gap. When applicants cannot predict outcomes, they either submit exception requests they shouldn't need to, or they don't submit requests they should because they assume denial. Neither outcome serves OHFA's goals.

We recommend the Process Manual include substantive criteria for evaluating exception requests. We're not asking for an exhaustive list, but for enough guidance to make the process predictable. What factors does OHFA weigh? What makes a request strong or weak? What kinds of requests have been granted in similar circumstances?

Second, we request that OHFA publicly publish exception request outcomes with a brief statement of rationale for each approval or denial. A searchable, accessible record of past decisions would allow approved exceptions to function as de facto guidance for future projects in similar circumstances. It would reduce the volume of exception requests OHFA receives over time, because applicants could self-screen based on how comparable situations have been handled. And it would make the process more equitable, since access to institutional knowledge about what OHFA approves or denies is currently unevenly distributed.

Closing

OHFA set the standard for this work, and we are supportive of that standard. We want to ensure that it is met. The design standards should be that bumper keeping a project out of the gutter, and nothing more. A good developer should never feel them. Where this letter pushes, it pushes toward that goal, not away from it.

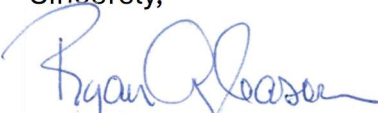
The length of these comments reflects how much OHC and its members care about getting this document right. It is not a measure of hostility toward the effort. We met as often as we did, for as long as we did, because the stakes are real. Every requirement that reaches past the floor adds cost, and in affordable housing cost is not an abstraction. It is measured in families. A dollar spent on a requirement the goal never needed is a dollar that no longer houses an Ohioan. That thread runs through every comment here, and it is why we keep returning to the same plain questions: What problem does this solve? And is the benefit worth the cost of having fewer units to house Ohioans?

We are asking OHFA to take those questions back to the draft and answer them, provision by provision. Build the second draft from the floor up. Justify each requirement that is included. Move the preferences to the QAP, where they belong. Keep the flexibility the codes and federal law already provide. Give historic rehabilitation a real home. Hold both parties to deadlines. None of this is a retreat from quality. It is a sharper definition of it.

OHFA has the time, and it has signaled the willingness to produce a second draft. OHC wants to help produce it. We will walk through the attached matrix with the Agency provision by provision. We will read a second draft as closely as we read this one. Our taskforce remains available to work through any piece of this in whatever detail is useful. We have done this work because we believe in it, and we believe OHFA does too.

Thank you for an open and genuine input process, and for the chance to be part of it. We look forward to the next draft.

Sincerely,



Ryan Gleason
Executive Director

cc: Bill Beagle, Executive Director, Ohio Housing Finance Agency
Matt Sutter, Senior Director of Housing Programs, Ohio Housing Finance Agency
Barbara Richards, Director of Multifamily Housing, Ohio Housing Finance Agency

Attachment: Provision-by-Provision Analysis

Provision-by-Provision Analysis

Section #	Description	1: Problem	2: Non-	3: Appropriate	4: Project Type	5: Full Cost	6: Cost-Benefit	7: Performance vs	8: Safe Harbors?	9: Clarity and	10: Exception	12: Correct	13: Exception
		Statement?	Duplication?	Authority?	Differentiation?	Accounting?	at Scale?	Prescription?		Enforceability?	Request Risk?	Vehicle?	Request Process Transparency?
G3	Codes and Compliance Standards	Fail	Pass	Pass	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
G3	OH-licensed Architect with Project Design Firm registration #	Fail	Fail	Fail	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Fail	N/A
G4	Adaptability & Accessibility	Fail	Pass	Unclear	Pass	N/A	N/A	N/A	Pass	Pass	N/A	Pass	N/A
G4	504 applies to entire project	Fail	Fail	Fail	Pass	N/A	N/A	N/A	Pass	Pass	N/A	Unclear	N/A
G4	504 Mobility Unit requirements	Fail	Fail	Fail	Pass	Fail	Fail	Pass	Fail	Fail	Fail	Fail	N/A
G4	504 Sensory Unit requirements	Fail	Fail	Unclear	Fail	Fail	Fail	Fail	Pass	Pass	Fail	Pass	N/A
G5	Distribution of 504 units	Fail	Fail	Fail	Unclear	Fail	Fail	Pass	Fail	Fail	Unclear	Fail	N/A
G5	Counter space and storage for accessible units comparable to non-accessible units	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Unclear	Fail	Unclear	Pass	N/A
G5	Accessible route to dumpster required unless interior trash chute/room provided	Fail	Fail	Fail	Pass	N/A	N/A	Pass	Unclear	Unclear	Pass	Pass	N/A
G5	# of 504 Mobility Units	Fail	Pass	Unclear	Pass	Fail	Fail	N/A	Pass	Pass	Unclear	Pass	N/A
G5	Additional Features for 504 Mobility Units	Fail	Pass	Fail	Fail	Fail	Fail	Fail	Pass	Unclear	Fail	Fail	Fail
N.2	Radon Reduction/Prevention	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A
N.3.1.1	Proposed sites	Fail	Pass	Fail	Pass	Fail	Fail	Pass	Pass	Pass	Unclear	Pass	N/A
N.3.1.2	Main entries - roof	Fail	Pass	Pass	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	N/A
N.3.1.3	Landscaping	Fail	Pass	Unclear	Pass	N/A	N/A	Pass	Pass	Unclear	Pass	Pass	N/A
N.3.1.3.1	No invasive species	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
N.3.1.4	5 ft sidewalks	Fail	Fail	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	N/A
N.3.1.5	Sidewalks from front door to driveway	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
N.3.1.6	Stormwater safety	Pass	Pass	Pass	Pass	Fail	Fail	Pass	Fail	Fail	Pass	Pass	N/A
N.3.2.1	Common space <= 20%	Fail	Pass	Pass	Unclear	Fail	Fail	N/A	Pass	Unclear	Pass	Pass	N/A
N.3.2.2	Common hallways >= 42"	Fail	Unclear	Fail	Pass	Fail	Fail	Unclear	Pass	Pass	Pass	Pass	N/A
N.3.2.3	No-step entry at main entrance	Fail	Fail	Fail	Pass	Fail	Fail	N/A	Pass	Pass	Unclear	Pass	N/A
N.3.2.4.1	Elevators if > 3 stories	Fail	Pass	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Pass	Pass	N/A
N.3.2.4.2	Seniors/PSH = 1 floor or accessible elevator	Fail	Pass	Pass	Pass	Fail	Unclear	N/A	Pass	Fail	Fail	Pass	N/A
N.3.2.5	If no laundry on site, must have hookups	Fail	Pass	Pass	Unclear	Fail	Fail	N/A	Pass	Pass	Pass	Pass	N/A
N.3.3.1	Minimum size requirements	Fail	Pass	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Unclear	Pass	N/A
N.3.3.2	No SROs	Fail	Pass	Fail	Pass	Fail	Fail	N/A	Pass	Pass	Pass	Unclear	N/A
N.3.3.3	Seniors = no units > 2 BR	Fail	Pass	Pass	Pass	N/A	Unclear	N/A	Pass	Pass	Pass	Pass	N/A
N.3.3.4.1	BR minimum storage	Fail	Pass	Pass	Fail	Fail	Unclear	N/A	Pass	Pass	Unclear	Pass	N/A
N.3.3.4.2	BA minimum storage	Fail	Pass	Pass	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
N.3.3.4.3	Kitchen minimum storage	Fail	Pass	Pass	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
N.3.4.1.1	Primary BR >= 120 sq ft	Fail	Fail	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Pass	Pass	N/A
N.3.4.1.2	Secondary BR >= 100 sq ft	Fail	Fail	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Pass	Pass	N/A
N.3.4.2	Closets don't count toward minimum sq ft.	Fail	Pass	Pass	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
N.3.4.3	3- and 4-BR must support double occupancy	Fail	Unclear	Fail	Pass	Unclear	Unclear	N/A	Fail	Fail	Unclear	Pass	N/A
N.3.5.1.1	0-BR/Studio >= 1 BA	Fail	Pass	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Pass	Pass	N/A
N.3.5.1.2	1-BR >= 1 BA	Fail	Pass	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Pass	Pass	N/A
N.3.5.1.3	2-BR >= 1 BA	Fail	Pass	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Pass	Pass	N/A
N.3.5.1.4	3-BR >= 1.5 BA	Fail	Pass	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Pass	Pass	N/A
N.3.5.1.5	4+-BR >= 2 BA	Fail	Pass	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Pass	Pass	N/A
N.3.5.2	Multi-story townhomes must have visible toilet room	Fail	Pass	Pass	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
N.3.5.3	504 mobility must have 1 roll-in shower	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	Pass	Fail	Pass	Unclear
N.3.5.3.1	If no trench drain, floor drain at center	Fail	Pass	Pass	Pass	N/A	N/A	Fail	Pass	Pass	Pass	Pass	N/A
N.3.5.4	Loop handles on drawers and cabinets	Fail	Fail	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	N/A
N.3.5.5	No sharp 90-degree corners on PLAM countertops	Pass	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
N.3.6.1.2	>=7 cu ft energy-star refrigerator	Fail	Pass	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Unclear	Pass	N/A
N.3.6.1.3	Energy-star dishwasher (if provided)	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
N.3.6.1.4	Loop handles on drawers and cabinets	Fail	Fail	Fail	Pass	N/A	N/A	Fail	Pass	Pass	Pass	Pass	N/A
N.3.6.1.5	15" Refrigerator door landing zone	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
N.3.6.3	Kitchen venting must exhaust to outside	Fail	Pass	Fail	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A
N.3.6.4	>= 12" landing zone on each side of stove/sink, 1 side of refrigerator	Fail	Pass	Pass	Fail	Fail	Fail	Fail	Pass	Pass	Fail	Pass	N/A
N.3.7.1.1	Int. doors: >= 32" wide	Fail	Fail	Fail	Fail	N/A	N/A	Pass	Pass	Unclear	Unclear	Fail	N/A
N.3.7.1.2	Int. doors: solid wood, semi-solid core or solid core, or insulated steel	Fail	Pass	Fail	Fail	Fail	Fail	Fail	Pass	Pass	Pass	Pass	N/A
N.3.7.1.2.1	Closet door exempt	Fail	Pass	Pass	Pass	N/A	N/A	Pass	N/A	Unclear	Fail	Pass	N/A
N.3.7.1.3	Lever-style handles on doors w/latches/locks	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
N.3.7.1.4	No bi-fold or accordion-type doors	Fail	Pass	Unclear	Fail	Fail	Fail	Fail	Pass	Pass	Unclear	Pass	N/A
N.3.7.1.5	Doors on accessible routes can't close faster than 5 seconds	Fail	Fail	Fail	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
N.3.8.1	If removable cabinets, floor/walls underneath must be finished	Fail	Fail	Fail	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Fail	N/A
N.3.8.2	Non-glare and slip resistant floor coverings	Fail	Fail	Fail	Fail	N/A	Fail	Fail	Fail	Fail	Unclear	Fail	N/A

Provision-by-Provision Analysis

Section #	Description	1: Problem Statement?	2: Non-Duplication?	3: Appropriate Authority?	4: Project Type Differentiation?	5: Full Cost Accounting?	6: Cost-Benefit at Scale?	7: Performance vs Prescription?	8: Safe Harbors?	9: Clarity and Enforceability?	10: Exception Request Risk?	11: Correct Vehicle?	12: Request Process Transparency?	13: Exception Request Process?
N.3.8.3	Color-contrasting anti-slip strips on front edge of interior stairs	Fail	Unclear	Unclear	Fail	Fail	Fail	Fail	Pass	Fail	Pass	Fail	N/A	N/A
N.3.9.1	New work must meet EUL in table	Fail	Pass	Pass	Pass	N/A	N/A	Unclear	Pass	Pass	Unclear	Pass	N/A	N/A
N.3.9.2.1	Vinyl siding >= 0.42"	Fail	Pass	Pass	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Unclear	N/A	N/A
N.3.9.2.2	EIFS prohibited, except for decorative trim > 7' above ground	Fail	Pass	Pass	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.2.3	Mud set brick/no metal grid system; >= 30 year warranty	Fail	Pass	Pass	Pass	Fail	Fail	Unclear	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.2.4	ASHRAE 90.1 insulation	Fail	Fail	Fail	Pass	N/A	N/A	Fail	Pass	Unclear	Unclear	Fail	N/A	N/A
N.3.9.2.5	Windows/ext. doors: >= V6 energy star rating for climate zone 5	Fail	Fail	Fail	Pass	Fail	Fail	Pass	Pass	Unclear	Pass	Fail	N/A	N/A
N.3.9.2.5.1	Window manufacturer must provide letter w/ESV6, U-value, infiltration	Fail	Fail	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Fail	Pass	N/A	N/A
N.3.9.2.5.2	HERS rater certification	Fail	Fail	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Fail	Pass	N/A	N/A
N.3.9.2.5.3	Storefront windows meet U-value for ESV6	Fail	Fail	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Fail	Pass	N/A	N/A
N.3.9.2.6	ANSI A161.1 for cabinet materials & have solid wood doors/fronts	Fail	Unclear	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.2.7	Solution-dyed nylon or high-performance commercial fiber carpets	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.2.7.1	Carpet allowed in management/social service office areas	Fail	Pass	Pass	Pass	N/A	N/A	Pass	N/A	Pass	Pass	Pass	N/A	N/A
N.3.9.2.7.2	Carpet allowed in BR, except for PSH	Fail	Pass	Pass	Pass	N/A	N/A	Pass	N/A	Pass	Pass	Pass	N/A	N/A
N.3.9.2.8	Moisture resistant gypsum	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.2.8.1	Moisture resistant gypsum in ceilings w/BA or toilets directly above	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.2.8.2	Moisture resistant gypsum w/in 4' of water source	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.2.8.3	Moisture resistant gypsum w/in 4' laundry machines, water heaters, etc.	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.2.8.4	Moisture resistant gypsum w/in 4' sprinkler service/water service lines	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.2.8.5	Moisture resistant gypsum behind drinking fountains	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.2.8.6	Moisture resistant gypsum in ext. walls w/sub-grade units	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.3.1	Seal holes to interior w/UV stable materials	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.3.2	Don't seal weepholes; include corrugated vents or rope wicks	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Unclear	Pass	Pass	N/A	N/A
N.3.9.3.3	Downspouts must empty onto concrete splash blocks	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.3.4	Refuse collection area must be paved and bear trucks	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.9.3.5	Concealed floor and stud-braced carriers for wall-hung sinks	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.10.1.1	ASHRAE 90.1 water heaters at time of 80% drawings	Fail	Fail	Fail	Pass	N/A	N/A	Fail	Pass	Pass	Pass	Fail	N/A	N/A
N.3.10.1.2	Lever-style handles on plumbing fixtures; anti-scald faucets	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Unclear	N/A	N/A
N.3.10.2.1	ASHRAE 90.1 HVAC systems at time of 80% drawings	Fail	Fail	Fail	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Fail	N/A	N/A
N.3.10.2.2	Thermostat easy to read/operate	Fail	Pass	Pass	Pass	N/A	N/A	Fail	Fail	Fail	Unclear	Pass	N/A	N/A
N.3.10.2.3	Air conditioned	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.10.2.5	Access to one stacked/adjacent mechanical unit w/o removing another	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A	N/A
N.3.10.3.1	Adequate non-glare lighting	Fail	Unclear	Pass	Pass	N/A	N/A	Fail	Fail	Fail	Unclear	Pass	N/A	N/A
N.3.10.3.2	Rocker, touch light, or hands free switches	Fail	Pass	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	N/A	N/A
N.3.10.3.3	Outlets, phone jacks, data ports >= 18" AFF	Fail	Pass	Unclear	Fail	Unclear	Unclear	Unclear	Pass	Unclear	Unclear	Pass	N/A	N/A
R.1	Applies to remodel of existing residential building/space	N/A	Pass	Pass	Fail	N/A	N/A	N/A	Unclear	Fail	Unclear	Pass	N/A	N/A
R.2	Lead-Based Paint Hazard Reduction	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	N/A	N/A
R.3	Radon Reduction/Prevention	Fail	Pass	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	Pass	Pass	Pass
R.4	Sustainability	Fail	Pass	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Fail	Pass	Unclear	N/A
R.4	3rd Party Certifications	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	Pass	N/A
R.4	HERS rater	Fail	Pass	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A	N/A
R.5	Minimum scope of work	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A	N/A
R.5	50% replacement threshold required to claim majority replacement of an MBS	Fail	Pass	Pass	Fail	Fail	Fail	N/A	Pass	Pass	Fail	Pass	N/A	N/A
R.5	Interior finishes and casework cannot count toward MBS replacement	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A	N/A
R.5	All systems/assemblies needing replacement per PCNA or architect must be in scope	Fail	Pass	Pass	Pass	Unclear	Unclear	Pass	Pass	Unclear	Unclear	Pass	Pass	Pass
R.5	Items with RUL < 50% must be replaced (unless exception)	Fail	Pass	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	Pass	Pass	Pass
R.5	New materials must be at 100% RUL	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A	N/A
R.5	Project completion: no mismatched, patchwork, or unwashed materials/finishes	Fail	Pass	Pass	Unclear	N/A	N/A	Pass	Pass	Unclear	Pass	Pass	N/A	N/A
R.5	Project completion: uniform door hardware	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Unclear	Pass	Pass	N/A	N/A
R.5	Project completion: no damage/rust/rot on ext. items	Fail	Pass	Pass	Pass	Unclear	Unclear	Pass	Unclear	Unclear	Pass	Pass	N/A	N/A
R.6.1.1	Landscaping	Fail	Pass	Pass	Fail	N/A	N/A	Unclear	Pass	Unclear	Pass	Pass	N/A	N/A
R.6.1.1.1	No invasive species	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A	N/A
R.6.1.2	5 ft sidewalks	Fail	Fail	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	N/A	N/A
R.6.1.3	Sidewalks from front door to driveway	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A	N/A
R.6.1.4	Stormwater safety	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Fail	Fail	Pass	Pass	N/A	N/A
R.6.2.1	Common space <= 20%, if footprint of existing building is expanding	Fail	Pass	Unclear	Fail	Fail	Fail	Pass	Pass	Fail	Fail	Pass	N/A	N/A
R.6.2.2.1	Existing elevator must be maintained and accessible to all	Fail	Pass	Pass	Fail	Unclear	Unclear	Fail	Pass	Pass	Unclear	Pass	N/A	N/A
R.6.2.2.2	Seniors/PSH = 1 floor or accessible elevator	Fail	Pass	Pass	Pass	Fail	Fail	N/A	Pass	Fail	Fail	Pass	N/A	N/A
R.6.2.3.1	If laundry currently on-site, must keep it	Fail	Pass	Pass	Fail	Unclear	Unclear	Pass	Pass	Pass	Fail	Pass	N/A	N/A

Provision-by-Provision Analysis

Section #	Description	1: Problem	2: Non-	3: Appropriate	4: Project Type	5: Full Cost	6: Cost-Benefit	7: Performance vs	8: Safe Harbors?	9: Clarity and	10: Exception	12: Correct	13: Exception
		Statement?	Duplication?	Authority?	Differentiation?	Accounting?	at Scale?	Prescription?					Request Process
R.6.3.1.1	0-BR/Efficiency >= 400 sq ft	Fail	Pass	Pass	Fail	Fail	Fail	N/A	Pass	Pass	Unclear	Pass	N/A
R.6.3.1.2	1-BR >= 500 sq ft	Fail	Pass	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Pass	Pass	Pass
R.6.3.1.2.1	Service enriched: 1-BR >= 450 sq ft	Fail	Pass	Pass	Pass	Fail	Fail	N/A	Pass	Pass	Pass	Pass	Pass
R.6.3.1.3	2-BR >= 700 sq ft	Fail	Pass	Pass	Unclear	Fail	Fail	N/A	Pass	Pass	Unclear	Pass	N/A
R.6.3.1.4	3-BR >= 950 sq ft	Fail	Pass	Pass	Unclear	Fail	Fail	N/A	Pass	Pass	Unclear	Pass	N/A
R.6.3.1.5	4+-BRR >= 1,100 sq ft	Fail	Pass	Pass	Unclear	Fail	Fail	N/A	Pass	Pass	Unclear	Pass	N/A
R.6.3.2	No SROs	Fail	Pass	Fail	Fail	Fail	Fail	N/A	Pass	Pass	Pass	Unclear	N/A
R.6.3.3	Seniors = no units > 2 BR	Fail	Pass	Unclear	Pass	N/A	N/A	N/A	Pass	Pass	Unclear	Pass	N/A
R.6.3.4.1	BR minimum storage	Fail	Pass	Pass	Unclear	Fail	Fail	Pass	Pass	Pass	Unclear	Pass	N/A
R.6.3.4.2	BA minimum storage	Fail	Pass	Pass	Unclear	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.3.4.3	Kitchen minimum storage	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.3.5	All ALL units on accessible level/path	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
R.6.4.1.1	Primary BR >= 110 sq ft	Fail	Fail	Unclear	Fail	Fail	Fail	N/A	Pass	Pass	Fail	Pass	N/A
R.6.4.1.2	Secondary BR >= 90 sq ft	Fail	Fail	Pass	Fail	Fail	Fail	N/A	Pass	Pass	Fail	Pass	N/A
R.6.4.2	Closets don't count toward minimum sq ft.	Fail	Pass	Pass	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
R.6.5.1	504 mobility must have 1 roll-in shower	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	Pass	Fail	Pass	N/A
R.6.5.1.1	If no trench drain, floor drain at center	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.5.2	Loop handles on drawers and cabinets	Fail	Fail	Fail	Fail	N/A	N/A	Fail	Pass	Pass	Pass	Pass	N/A
R.6.5.3	No sharp 90-degree corners on PLAM countertops	Pass	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.6.1	Affordable units must include [list of appliances]	Fail	Pass	Pass	Pass	N/A	N/A	N/A	Pass	Unclear	Pass	Pass	N/A
R.6.6.1.1	Stand-alone range (>=24" wide) or cooktop/wall oven	Fail	Pass	Pass	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
R.6.6.1.2	Energy-star refrigerator; no under-counter refrigerators)	Fail	Pass	Pass	Pass	Unclear	Unclear	Pass	Pass	Pass	Pass	Pass	N/A
R.6.6.1.3	Energy-star dishwasher (if provided)	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Unclear	Pass	Pass	N/A
R.6.6.1.4	Loop handles on drawers and cabinets	Fail	Fail	Fail	Fail	N/A	N/A	Fail	Pass	Pass	Pass	Pass	N/A
R.6.6.2	All ALL electric appliances	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
R.6.6.3	Recirculating hoods only if no existing kitchen venting w/ >= 6" diameter to ext.	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Unclear	Pass	Pass	N/A
R.6.6.4	>= 9" landing zone on each side of stove/sink, 1 side of refrigerator	Fail	Pass	Unclear	Fail	Fail	Fail	Pass	Pass	Pass	Fail	Pass	N/A
R.6.7.1.1	Int. doors: solid wood, semi-solid core or solid core, or insulated steel, if replacing	Fail	Pass	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	N/A
R.6.7.1.2	May keep existing door widths unless 504 mobility unit	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.7.1.3	Lever-style handles on doors w/latches/locks	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.7.1.4	No bi-fold or accordion-type doors	Fail	Pass	Pass	Fail	Fail	Fail	Fail	Pass	Pass	Fail	Pass	N/A
R.6.7.1.5	Doors on accessible routes can't close faster than 5 seconds	Fail	Fail	Fail	Pass	N/A	N/A	Pass	Pass	Unclear	Pass	Pass	N/A
R.6.8.1	If removable cabinets, floor/walls underneath must be finished	Fail	Fail	Fail	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.8.2	Non-glare and slip resistant floor coverings	Fail	Unclear	Pass	Pass	N/A	N/A	Fail	Fail	Fail	Fail	Pass	N/A
R.6.8.3	Color-contrasting anti-slip strips on front edge of interior stairs	Fail	Pass	Pass	Pass	N/A	N/A	Fail	Fail	Fail	Fail	Pass	N/A
R.6.9.1	New work must have EUL numbers in table	Fail	Pass	Pass	Pass	N/A	N/A	Unclear	Pass	Pass	Unclear	Pass	N/A
R.6.9.2	SHPO materials are exempt; must provided at application	Fail	Pass	Pass	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
R.6.9.3.1	Vinyl siding >= 0.42"	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.3.2	EIFS prohibited, except for decorative trim > 7' above ground	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Unclear	Pass	Pass	N/A
R.6.9.3.3	Mud set brick/no metal grid system; >= 30 year warranty	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.3.4	ASHRAE 90.1 insulation	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.3.5	Windows/ext. doors: >= V6 energy star rating for climate zone 5	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.3.5.1	Window manufacturer must provide letter w/ESV6, U-value, infiltration	Fail	Fail	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Fail	Pass	N/A
R.6.9.3.5.2	HERS rater certification	Fail	Fail	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Fail	Pass	N/A
R.6.9.3.5.3	Storefront windows meet U-value for ESV6	Fail	Fail	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Fail	Pass	N/A
R.6.9.3.6	ANSI A161.1 for cabinet materials & have solid wood doors/fronts	Fail	Unclear	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Fail	Pass	N/A
R.6.9.3.7	Solution-dyed nylon or high-performance commercial fiber carpets	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.3.7.1	Carpet allowed in management/social service office areas	Fail	Pass	Pass	Pass	N/A	N/A	Pass	N/A	Pass	Pass	Pass	N/A
R.6.9.3.7.2	Carpet allowed in BR, except for PSH	Fail	Pass	Pass	Pass	N/A	N/A	Pass	N/A	Pass	Pass	Pass	N/A
R.6.9.3.7.4	Carpet tile allowed in corridors for seniors/AALs with quarterly cleaning	Fail	Pass	Pass	Pass	N/A	N/A	Pass	N/A	Pass	Pass	Pass	N/A
R.6.9.3.8.1	Moisture resistant gypsum in ceilings w/BA or toilets directly above	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.3.8.2	Moisture resistant gypsum w/in 4' of water source	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.3.8.3	Moisture resistant gypsum w/in 4' laundry machines, water heaters, etc.	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.3.8.4	Moisture resistant gypsum w/in 4' sprinkler service/water service lines	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.3.8.5	Moisture resistant gypsum behind drinking fountains	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.3.8.6	Moisture resistant gypsum in ext. walls w/sub-grade units	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.4.1	Seal holes to interior w/UV stable materials	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.4.2	Don't seal weepholes; include corrugated vents or rope wicks	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.4.3	Downspouts must empty onto concrete splash blocks	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A

Provision-by-Provision Analysis

Section #	Description	1: Problem Statement?	2: Non-Duplication?	3: Appropriate Authority?	4: Project Type Differentiation?	5: Full Cost Accounting?	6: Cost-Benefit at Scale?	7: Performance vs Prescription?	8: Safe Harbors?	9: Clarity and Enforceability?	10: Exception Request Risk?	12: Correct Vehicle?	13: Exception Request Process Transparency?
R.6.9.4.4	Refuse collection area must be paved and bear trucks	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.9.4.5	Concealed floor and stud-braced carriers for wall-hung sinks	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.10.1.1	ASHRAE 90.1 water heaters at time of 80% drawings	Fail	Fail	Fail	Pass	N/A	N/A	Fail	Pass	Pass	Pass	Fail	N/A
R.6.10.1.2	Lever-style handles on plumbing fixtures; anti-scald faucets	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Pass	Unclear	N/A
R.6.10.1.3	Full port stainless steel shut-off valves	Fail	Pass	Pass	Pass	Fail	Fail	Pass	Pass	Pass	Fail	Pass	N/A
R.6.10.2.1	ASHRAE 90.1 HVAC systems at time of 80% drawings	Fail	Fail	Fail	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Fail	N/A
R.6.10.2.2	Thermostat easy to read/operate	Fail	Pass	Pass	Pass	N/A	N/A	Fail	Fail	Fail	Unclear	Pass	N/A
R.6.10.2.3	Air conditioned	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.10.2.4	No PTAC units; PTHP units only allowed in AAL	Fail	Pass	Pass	Pass	N/A	N/A	Fail	Pass	Pass	Pass	Pass	N/A
R.6.10.2.4.1	Sleeves must be composite nonconductive energy efficient	N/A	N/A	N/A	Pass	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
R.6.10.2.4.2	Duct kits can't block controls/windows	N/A	N/A	N/A	Pass	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
R.6.10.2.4.3	No open (non-closing) ducts to ext.	N/A	N/A	N/A	Pass	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
R.6.10.2.5	Must be able to get to stacked or adjacent mechanical units w/o removing another	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.10.3.1	Adequate non-glare lighting	Fail	Unclear	Pass	Pass	N/A	N/A	Fail	Fail	Fail	Unclear	Pass	N/A
R.6.10.3.2	Rocker, touch light, or hands free switches	Fail	Pass	Fail	Pass	Fail	Fail	Fail	Pass	Pass	Pass	Pass	N/A
R.6.10.3.3	NSPIRE standards for outlets	Fail	Pass	Unclear	Pass	Unclear	Unclear	Unclear	Pass	Unclear	Unclear	Pass	N/A
R.6.10.3.4	Replace obsolete electrical panels/meter equipment	N/A	N/A	N/A	Pass	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
R.6.10.3.4.1	Renewable cartridge fuses are not obsolete	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.10.3.4.2	Replacement breakers must have test letter	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
R.6.10.3.5	NSPIRE standards for smoke alarms	Fail	Pass	Pass	Pass	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
App A	PCNA qualifications (architect/engineer license OR 5+ years experience)	Fail	Pass	Pass	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
App A	PCNA third-party independence (cannot be project architect, GC, manager, or sponsor)	Fail	Pass	Pass	N/A	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
App A	PCNA scope must conform to ASTM E2018-24 or current standard	Fail	Pass	Pass	N/A	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
App A	PCNA unit sampling: 25% (<50 units), 20% (50–99), 15% (100+)	Fail	Pass	Pass	N/A	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
App A	PCNA must sample all accessible units, common facilities, site improvements, building ext	Fail	Pass	Pass	N/A	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
App A	PCNA site visit must be within 1 year of submission; OHFA may require update if > 6 mont	Fail	Pass	Pass	N/A	N/A	N/A	N/A	Pass	Pass	Pass	Pass	N/A
App A	PCNA must include OHFA Table of Contents template (Appendix B)	Fail	Pass	Pass	N/A	N/A	N/A	Pass	Pass	Pass	Pass	Pass	N/A
App C	Any material used in OHFA projects must be in the EUL table	Fail	Pass	Pass	N/A	N/A	N/A	Fail	Fail	Unclear	Fail	Pass	N/A
App C	New work must meet or exceed EUL numbers in table	Fail	Pass	Pass	N/A	Fail	Fail	Pass	Pass	Unclear	Fail	Pass	N/A
PM 1	Preliminary submittal: DCF including Construction Certification	Fail	Unclear	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Pass	N/A
PM 1	Preliminary submittal: Scope of Work form	Fail	Fail	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Fail	N/A
PM 1	Preliminary submittal: Cover sheet, site plan w/ adjacent parcel info, unit schedule	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Pass	N/A
PM 1	Preliminary submittal: Color-coded floor plans w/ BOMA classifications	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Fail	Pass	Pass	N/A
PM 1	Preliminary submittal: Typical wall sections (new construction)	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Pass	N/A
PM 1	Preliminary submittal: Schematic HVAC/plumbing/electrical drawings or descriptions	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Unclear	Pass	Pass	N/A
PM 1	Final submittal: 80% complete drawings, all trades	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Fail	Pass	Pass	N/A
PM 1	Final submittal: Updated DCF + Construction Certification + accessibility/energy verificatio	Fail	Unclear	Pass	N/A	N/A	N/A	N/A	N/A	Fail	Fail	Pass	N/A
PM 1	Final submittal: Updated Scope of Work form	Fail	Fail	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Fail	N/A
PM 1	Final submittal: Asbestos/mold/lead-based paint considerations as required	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Pass	N/A
PM 1	Final submittal: Environmental site assessment items completed/in-scope	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Pass	N/A
PM 1	Final submittal: Condominiumized space documentation, if applicable	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Fail	Pass	Fail	N/A
PM 1	Final submittal: 80% drawing requirements	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Unclear	Pass	Pass	N/A
PM 1	Final submittal: CAD files	Fail	Fail	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Fail	N/A
PM 3	Quarterly Construction Monitoring ReportS: due dates	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Pass	N/A
PM 3	Notification of Construction Start: Pre-construction meeting for HDAP	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Pass	N/A
PM 3	Construction Monitoring: Periodic OHFA site visits	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Unclear	Pass	Pass	N/A
PM 3	Construction Monitoring: Change orders	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Fail	Fail	Pass	N/A
PM 3	Construction Monitoring: notification of substantial change from 80% drawings	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Fail	Fail	Pass	N/A
PM 3	Additional HOME/NHTF Documentation: Section 3 requirements	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Pass	N/A
PM 3	Additional HOME/NHTF Documentation: BABA compliance	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Pass	N/A
PM 3	Construction Completion: Closeout site visit	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Pass	Pass	Pass	N/A
PM 3	Construction Completion: Closeout documents	Fail	Pass	Pass	N/A	N/A	N/A	N/A	N/A	Unclear	Pass	Pass	N/A