



Moody Nolan

June 26, 2026

Bill Beagle
Executive Director
Ohio Housing Finance Agency
2600 Corporate Exchange Drive
Columbus, Ohio 43231

Re: OHFA 2027 Design & Architectural Standards Draft – May 2026

Dear Mr. Beagle,

Thank you for the opportunity to offer our comments as vested stakeholders in the Design & Architectural Standards process. As architects, we value the chance to provide input, appreciate our continued partnerships, and offer the attached comments in response to the recently released OHFA 2027 DAS Draft (released May 2026).

On behalf of Moody Nolan, we appreciate your consideration of our remarks. We are always available to discuss these items in greater detail if desired.

Sincerely,

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C/c: Yanitza Brongers-Marrero
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Moody Nolan - 2027 OHFA Design & Architectural Process Manual Comments			
TOPIC / OHFA DAPM SECTION NUMBER	OHFA DAPM PAGE(S)	OHFA TEXT	MN COMMENT
GENERAL COMMENTS			
Submissions	Pages 3-5	N/A	Please confirm that there are no hard copies required for either Preliminary for Final Submissions.
2027 OHFA Design & Architectural Standards Comments			
TOPIC / OHFA DAS SECTION NUMBER	OHFA DAS PAGE(S)	OHFA TEXT	MN COMMENT
GENERAL COMMENTS			
Laundry	N/A	N/A	Are both top and front-loaded washer & dryer appliances required if multiple appliances are provided in a project? Are there Energy-Star rating requirements for any Owner-provided equipment?
Pre-Approved Materials	N/A	N/A	Are there no longer requirements for specific pre-approved materials?
Dumpsters	N/A	N/A	Are there no longer requirements for dumpster screening?
Sustainability- New Construction	N/A	N/A	There is no specific section for Sustainability of New Construction projects. What are the acceptable sustainability standards for these projects?
Plumbing	N/A	N/A	Are there no longer requirements for cleanout locations in Corridors? Are there no longer requirements for WaterSense rated fixtures?
GENERAL REQUIREMENTS			
G4. Adaptability & Accessibility Laws Section 504 of the Rehabilitation Act of 1973 (Section 504) 504 Unit Types	Page 9	Section 504 applies to the entire project including all sites, all buildings, designated residential units, all common areas, and all site features. Applicant must identify a single accessibility standard for compliance with Section 504 requirements: either the Uniform Federal Accessibility Standards (UFAS), the 2010 ADA Standards for Accessible Design with identified exceptions (see HUD’s 2014 Deeming Notice), or an equivalent standard as permitted per 24 CFR 8.32.	Please provide clarification on what extents are to be taken for making a Type B Unit accessible, particularly in Rehab projects.
G4. Adaptability & Accessibility Laws Section 504 of the Rehabilitation Act of 1973 (Section 504) 504 Unit Types	Page 9	<u>Mobility Unit</u> : Is fully accessible for persons with mobility disabilities.	Clarify what is meant by "fully accessible" as ANSI Type A Mobility Units are not fully accessible by definition.
G5. OHFA Accessibility Requirements Number of Section 504 Mobility Units Affordable Assisted Living	Page 10	Affordable Assisted Living: 20% of units must meet Section 504 Mobility standards // 10% of units must meet Section 504 Sensory standards	Clarify if guidelines for "Affordable Assisted Living" projects are for new construction, rehab, or both. Other project types in this section specify.

G5. OHFA Accessibility Requirements Number of Section 504 Mobility Units General Occupancy (New Construction) and All Rehab	Page 10	OPTION B: 5% of the dwelling units must meet Section 504 Mobility standards and another 5% must meet the requirements for Semi-ambulatory units as defined here: Semi-ambulatory units are intended to serve people with crutches, canes & walkers. Requirements include: stair and ramp handrails with compliant extensions (if applicable), compliant stair nosings, compliant grab bars at toilets and tubs/showers, compliant accessible entry and accessible path through the unit. In units with showers, a compliant shower seat must be provided. In all cases, “compliant” refers to compliance with the project’s selected accessibility standard for Section 504 compliance. Task- or day- lighting must be provided at kitchen sink and range. Where at least one parking space is provided for each dwelling unit, at least one accessible parking space is required to be located in proximity to the entry for each semi-ambulatory unit.	Define "in proximity" when specify parking space requirements for semi-ambulatory units. Is there a specific distance?
G5. OHFA Accessibility Requirements Additional Features for 504 Mobility Units	Page 11	N/A	Clarify if additional selections from tables A1, A2, B, and C are required for semi-ambulatory and flex units.
G5. OHFA Accessibility Requirements Additional Features for 504 Mobility Units	Page 11	Column A2	Many of these options may be difficult to achieve, especially for rehabilitation projects.
G5. OHFA Accessibility Requirements Additional Features for 504 Mobility Units	Page 11	Column A2 - Casement windows with all operating hardware within reach range.	Is all operating hardware required within reach range? This significantly limits window size as operating hardware on upper sections of windows will be out of reach range.
GUIDELINES FOR NEW CONSTRUCTION			
N3. OHFA Design Requirements N3.1. Site Design N3.1.6.	Page 14	Stormwater management areas must be provided with recognized design measures to ensure safety for children and other residents of the project or the surrounding neighborhood. Overflow and drainpipes must have safety grating.	Does this also mean storm detention/retention ponds must be fenced in?
N3. OHFA Design Requirements N3.5. Bathrooms N3.5.2.	Page 15	Multi-story townhomes must have a visitable toilet room, as defined in ANSI A117.1-2017 Section 1105.6, on the accessible floor.	Define term "visitable"
N3. OHFA Design Requirements N3.6. Kitchen & Appliances N3.6.4.	Page 16	Kitchens must have at least a 12” wide countertop “landing zone” on each side of stove and sink, and at least one side of refrigerator. This may be shared with another appliance and/or required work surface if applicable. Microwaves are permitted in landing zones.	Clarify how microwaves are able to be implemented into a 12" wide landing zone?
N3. OHFA Design Requirements N3.7. Doors N3.7.1.5.	Page 16	Doors on an accessible route may not close faster than 5 seconds from a 90-degree open position, unless on a code-approved hold open.	Unclear if this applies to exterior doors on an accessible route as this item is listed under "Interior doors" requirements.
N3.9. Durability N3.9.2. Material Specifications N3.9.2.7.4.	Page 17	In senior developments and AAL, carpet tile is permitted in corridors if applicant presents a plan for quarterly professional cleaning.	Suggestion to change language from "quarterly professional cleaning " to "quarterly professional maintenance. " As cleaning will not tripping hazards in carpet will not be removed by cleaning.

GUIDELINES FOR REHABILITATION			
R4. Sustainability	Page 22	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. Certification from a Home Energy Rating System (HERS) rater that the requirements have been met is required upon construction completion. At OHFA's discretion, exceptions may be granted for an otherwise qualified and licensed professional to verify compliance with the DAS in projects unable to retain a HERS rater in their area. Certification from the applicable green building rating system itself is recommended but not required.	Please provide clarification on Sustainability requirement for Rehab projects. All OHFA funded projects are required to meet the requirements of an energy efficiency or green building certification but certification from the applicable green building rating system itself is only recommended and not required?
R5. Minimum Scope of Work Expectations at Project Completion	Page 23	All rehabilitation projects must be complete in scope such that materials and finishes appear clean and consistent. Mismatched, patchwork, or unwashed materials and finishes will not be accepted at completion of any rehabilitation. All deficiencies observed in the PCNA must be addressed. Materials such as carpet, vinyl composite tile (VCT) thickness, vinyl siding, building systems, and mechanical systems may not be patched or repaired if they do not meet the OHFA DAS for the year in which the project was funded. Door hardware should be uniform in style throughout dwelling units. Exterior concrete, stairs, play equipment, shelters, and outbuildings shall be in good condition upon completion without damage, rust, or rot and must have a painted or weather cover meeting OHFA's DAS.	Suggest to move language about "door hardware required to be uniform in style throughout dwelling units," to [R4.7. Doors] section as it could be missed being buried within [R5. Minimum Scope of Work.]
R6. OHFA Design Requirements	Pages 24-29	N/A	Should these sections be labeled "R6"? Right now they are shown as "R4" and Section R4 refers to Sustainability.
R6. OHFA Design Requirements R4.2. Building Design R4.2.3. Laundry R4.2.3.1.	Page 24	If laundry facilities are currently provided on-site, this amenity must be maintained.	Please define what is meant by "maintained." Are the existing facilities able to be shut down, if for example, laundry is provided in the units in its place?
R6. OHFA Design Requirements R4.6. Kitchen & Appliances R4.6.4.	Page 26	Kitchens must have at least a 9" wide countertop "landing zone" on each side of stove and sink, and at least one side of refrigerator. This may be shared with another appliance and/or required work surface if applicable. Microwaves are permitted in landing zones.	Clarify how microwaves are able to be implemented into a 9" wide landing zone?
R4.9. Durability R4.9.3.7.4.	Page 27	In senior developments and AAL, carpet tile is permitted in corridors if applicant presents a plan for quarterly professional cleaning.	Suggestion to change language from "quarterly professional cleaning " to "quarterly professional maintenance ." As cleaning will not tripping hazards in carpet will not be removed by cleaning.
R4.9. Durability R4.9.3.8.	Page 27-28	Any gypsum board that is installed or replaced as part of the rehab scope must be moisture-resistant gypsum board in the following areas:	Please provide further clarifications of extents on where moisture-resistant gypsum board must be installed as it can be a bit of a gray area in rehab projects where scope of work can start and stop.