



671 S. High St.
Suite 600
Columbus, OH 43206
614.224.8446

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Jenni Cahill
Architecture & Construction Section Chief

Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

Dear Ms. Cahill,

OCCH appreciates the opportunity to comment on the initial drafts of the *2027 Design & Architectural Standards (DAS)* and the related *2027 Design & Architectural Process Manual (DAPM)*. OCCH recognizes OHFA's significant effort in developing these documents and supports standards that are clear, practical, and aligned with the delivery of safe, durable, accessible, and financially feasible affordable housing throughout Ohio.

OCCH also values our relationship with OHFA and appreciates OHFA's outreach to stakeholders throughout this process. The statewide meetings, involvement of appropriate Agency personnel, and willingness to revisit the standards in a comprehensive way demonstrate a productive and open process for addressing requirements that materially affect affordable housing development in the state.

OCCH has reviewed the matrix prepared by Ryan Gleason, OHC Executive Director, with input from a team of LIHTC professional stakeholders. The matrix is a valuable and practical tool because it organizes the DAS review in a comprehensive, logical format and provides clear, actionable recommendations for making the standards more focused, flexible, and effective. OCCH has considered the issues and proposed revisions advanced by the Ohio Housing Council (OHC), including the detailed provision-by-provision review prepared by OHC's developer and architect taskforce. OCCH agrees with the core substance of those comments and endorses the recommended revisions. OCCH shares OHC's position that each DAS provision should be tied to a specific problem, weighed against its cost implications, and confined to requirements needed to establish an appropriate baseline for quality, durability, accessibility, and resident well-being.

OCCH acknowledges that design standards adopted by OHFA can play a valuable role. In the competitive tax credit environment, baseline requirements can help guard against substandard outcomes and promote consistency across funded projects. At the same time, OCCH agrees with OHC that the DAS should operate as a minimum threshold, not as a detailed design directive. The standards should protect residents and the integrity of the program while preserving professional discretion, viable design solutions, and cost efficiency.

OCCH is concerned that the current draft does not yet fully achieve the fresh, ground-up review stakeholders understood OHFA to be pursuing. Several prior DAS provisions appear to have been carried forward, and some continue to move beyond minimum protections by favoring design choices or limiting alternatives that

otherwise comply with applicable codes. OCCH shares OHC's concern that such provisions can increase cost and complexity without a demonstrated corresponding benefit.

For that reason, OCCH encourages OHFA to review each requirement using the same questions OHC has emphasized: What specific issue is the standard intended to address, and does the expected benefit warrant the added cost? The impact of the DAS on affordable housing development costs cannot be overstated, and this rewrite is therefore highly consequential. Each requirement above the minimum carries a real price. Affordable housing already faces persistent concern about construction costs, and OHFA should avoid adding expense unless the requirement is supported by a clear rationale and a benefit that justifies the burden. In practical terms, every dollar spent on a standard that goes beyond what is needed to meet its legitimate purpose is a dollar unavailable to house an Ohioan. Underbuilding critical features is a problem, but overbuilding can also have consequences when added costs reduce the number of families who can access a home.

OCCH therefore supports OHC's recommendation that OHFA retain only those standards that are clearly supported, appropriately focused, and necessary to establish the intended baseline. Throughout OHFA's meetings and calls, stakeholders emphasized that architects are the licensed professionals responsible for project design, carrying both their professional stamp and reputation. OHFA should set clear guardrails, while allowing architects the flexibility to design within them. The matrix that OHC's produced, provides a useful framework for identifying which standards are necessary and effective, and which should be revised, removed, clarified, or moved to the Qualified Allocation Plan as optional scoring items rather than mandatory DAS requirements.

OCCH appreciates OHFA's continued engagement with stakeholders and respectfully encourages the Agency to incorporate these recommendations into the 2027 draft of the DAS. Doing so will help ensure that the standards remain focused, cost-conscious, and flexible enough to support high-quality affordable housing while preserving project feasibility. OCCH looks forward to continuing to work with OHFA, OHC, and other stakeholders as this process moves forward.

Sincerely,



Kip Lewis

OCCH, Director of Construction Management