



November 5, 2024

To: All Interested Parties

From: Ohio Housing Finance Agency

Re: 2024-2025 9% LIHTC QAP with 2025 Technical Amendments
Frequently Asked Questions (FAQ)

FAQ Background

The following is a summary of questions received regarding the [2025 9% Low-Income Housing Tax Credit \(LIHTC\) Qualified Allocation Plan Technical Amendment](#) guidelines (the “Guidelines”). Questions were edited for style, to remove identifying details, and combined with similar questions from various individuals. The answers posted herein clarify and modify the Guidelines and will be considered during the program round. In accordance with the 2025 Program Calendar found on page 8 of the Guidelines, OHFA will continue accepting FAQs for the 2025 9% LIHTC round until Friday, January 10, 2025, by 5:00 p.m. EST.

Preserved Affordability – Project Eligibility

Q: If an existing LIHTC property added additional units to increase the unit count, would it still compete in the Preserved Affordability - LIHTC resyndication subpool? For example, if a 40 unit LIHTC deal in Year 20 added 20 additional non-LIHTC units.

A: Yes, project eligibility is based on the majority of units so if the majority of units preserve existing affordability, then it would compete in the preserved affordability pool.

Q: If a preservation project is both an old LIHTC deal (post year 15) and also has 75+% HAP operating subsidy, can it choose which sub pool it competes in?

A: No, based on the definitions in the QAP, if the project has rental assistance on at least 75% of units, then it must compete in the rental assistance subpool.

Service-Enriched Housing – Expert Recommendation

Q: How many points are associated with a non CoC priority (child welfare, MH board). The only points noted are 15 for 1st CoC priority and 10 for 2nd. Doesn't speak to the other eligible partners.

A: We will default to the [2023 QAP](#), screenshot below, where it put the outside CoC support/recommendation with the 10 point category as this was not clarified in the 2024 QAP.

3. Expert Recommendations

Maximum points: 20

Proposals that have been designated a primary or secondary priority/recommendation by the applicable Continuum of Care (CoC) for PSH applicants.

- Primary designation = 20 points
- Secondary designation = 10 points

Proposals with a letter of support/recommendation from outside of a Continuum of Care meeting the following criteria (10 points):

- from a public entity (e.g., Mental Health and Recovery system board, local child welfare system of care) which has no affiliation with any member of the Development Team;
- accurately addresses multiple aspects specific to the application, and
- does not express expectations inconsistent with QAP limitations or requirements.

Submission Requirement: Applicants must submit the applicable letter of designation or recommendation with the proposal application.

Building Amenities – Outdoor Patio

Q: If we can confirm that the canopy is at least 200 sf, does it matter whether the whole patio exceeds 400sqft? The QAP awards these points where the patio "is at least 50% covered", but what if the patio is 1000sqft? Would the covered portion need to be 500sqft?

A: Based on how the QAP is written, the outdoor patio would need to be at least 400sqft and whatever size it is, at least 50% would need to be covered. So correct, if it is 1,000sqft, then at least 500sqft would need to be covered.

Discount to Market Rent Data

Q: Can you please confirm if the "Discount to Market Rent" criterion will use 2023 or 2024 Small Area Fair Market Rents and Fair Market Rents? All drafts of the 2025 QAP and OHFA's published instructions for using the QAP's map reference 2024 data. However, the final version of the QAP and the map reference 2023 data. OHFA has also updated these data annually for state LIHTC applications.

A: Although we anticipated updating the Discount to Market Rent Data to 2024, some of our stakeholders felt that this data update was too substantial for a technical amendment as it would change how sites would score. Thus, we reverted the 2025 QAP TA to use 2023 Discount to Market Rent data, which was used in the 2024 QAP.

Exception Request - Minimum Unit Size Requirement

Q: Our project is an adaptive reuse of an existing structure. Is it possible to pursue an exception to the minimum unit size requirements for 0-bedroom/efficiency units?

A: This is an allowable exception request to make per p. 27 of the [Design and Architectural Standards](#). Design exception requests are due with a project's proposal application and the exception request must include adequate supporting documentation to demonstrate how the incorporation of the element is infeasible. Exception requests are reviewed and evaluated during the proposal application review period.

New Affordability General Occupancy: Three-Bedroom Requirement

Q: Can a developer use four-bedroom units to help satisfy the three-bedroom requirement? For example, if a project would need to include at least 10 three-bedroom units under the QAP, could 8 three-bedroom and 2 four-bedroom units be compliant?

A: Unfortunately, no. This will be auto calculated in the new AHFA and it will only pull the number of 3-bdrm units as a share of total units to meet the threshold requirement.

Community Impact Strategic Initiative

Q: For projects competing under the "community impact strategic initiative" set-aside, will their score for their applicable subpool in any way be factored into the selection criteria?

A: Projects will first compete in their funding pool and may be awarded competitively or through another set aside. After all competitive reservations and set asides are established, OHFA will then evaluate the remaining eligible applicants (keeping in mind county cap limits and development team limits) that sought out the Community Impact Strategic Initiative set-aside. Projects will then be evaluated based on the information provided on how it meets the terms outlined in the set aside description. We will also evaluate the projects that were submitted and will give preference to those that are located in a county that has not received an OHFA tax credit award in the last five years. OHFA Board has sole discretion on which project(s) will be reserved funding under this set aside.

Developer Experience and Capacity

Q: The application limits set forth on page 22 of the QAP reference "development teams" rather than individual members of the development team. For projects with multiple developers or consultants, there is ambiguity that we seek further clarification

on. We seek to better understand how OHFA would treat the following scenarios: There is an application where both lead developer and co-developer would be limited to one tax credit reservation under the guidelines. However, the co-developer submitted another application that scores competitively to receive a reservation. The lead developer only submitted one application. Would the lead developer need to remove the co-developer to receive an award? Would the co-developer need to forfeit their other award to remain a part of the development team for this application?

A: Development teams are evaluated on a per project basis at pre-application. If the development team is approved at pre-application for that project, the development team cannot change for that project at proposal application or at reservation announcement. If each member of the development team is eligible to receive one reservation and if one member receives a reservation on another project, then that member would be ineligible to receive an additional reservation.

Q: There is an application where the lead developer and development consultant would be limited to one tax credit reservation under the guidelines. However, the development consultant submitted another application that scores competitively to receive a reservation. The lead developer only submitted one application. Would the lead developer need to remove the development consultant to receive an award? Would the development consultant need to forfeit their other award to remain a part of the development team for this application?

A: Development consultants are not factored into application/reservation limits, only the lead developer and co-developer.

Q: Does OHFA have specific guidance that separates a co-developer from a development consultant?

A: Yes, please refer to Appendix A, items 12 and 13, and Appendix B. In general, a co-developer may provide the necessary experience (8609) and capacity for a project, but a development consultant's experience will not count.