**QAP Section**

**GENERAL OVERVIEW & REQUIREMENTS**

**Application Process: Pre-Application Meeting**
- This is helpful and may facilitate ease for both developers and OHFA

**HTC REQUIREMENTS: DOCUMENT SUBMISSION REQUIREMENTS**

**Conditional Financial Commitments**
- We suggest that OHFA consider changing this requirement back to what they have had in previous QAPs, requiring commitment letters at final application.

**Development Team Experience & Capacity Review: Pre-Approval Process**
- We support OHFA’s pre-approval process for Development Teams to create more efficiency for your team during the Ohio 9% HTC review process.

- The important thing for OHFA to remember is the experience not of any specific organization but those who make up the organization. All that said, once an individual has established bona fides with OHFA, they should not have to re-up every year. OHFA has the data before them in their own systems. What should be vetted are new people to the system
- The draft QAP is putting forth the requirement that the narrative describing the development team outline the work performed by each staff member. To what point? Most teams share the work with people performing multiple tasks that others may also work on.
- We believe the inclusion of a pre-approval process for the development team will be beneficial to OHFA and other partners. We recommend moving the first day pre-approval forms may be submitted to November 13, 2020 and to allow for early decisions.
- Please clarify whether “development team” means an individual team or a project development team that could be a joint venture. The concern if OHFA means a project development team is sometimes, the relationships form late in the process and in these situations, the pre-approval dates could easily be missed.

**Revitalization Plan**
- We believe it would be prudent to include a component about improving the accessibility of the area for people with disabilities under the “Other Policy” section. It fits in well with the other components of this section and developers will most likely be thrilled to have another option to incorporate into their plans for more points. This section could focus on improvements such as adding curb cuts to the sidewalks near the development.

**HTC REQUIREMENTS: HTC PROGRAMMATIC REQUIREMENTS & OVERSIGHT**

**Competitive Application Limitations**
- We request that OHFA review the competitive application limitations to align with the experience and capacity review requirements, and that, at least, Ohio 4% HTC 8609 are included in the allocated 8609 count tied out to application and award limitations.
- We encourage OHFA to review the maximum number of applications per developer. We support policy that focuses on encouraging the highest and best applications from all development teams, rather than a volume of submissions, to secure maximum total credit allocation.
- Eliminate “Ohio” from the number of 8609s requirement.
- Eliminate the language stating a “staff of 10 people,” as it is a broad and irrelevant metric that does not add value toward accomplishing the State’s housing policy goals.
- Ranking proposal applications in the AHFA is fine but provide developers an opportunity to modify their ranking prior to awards
- Return to the 2019 QAP language where all developers who have achieved an 8609 may submit four applications and receive two award
- If a qualified developer is co-developing with an inexperienced firm, then permit one additional application and award
- FHAct50 award locations and recipients should count toward a developer’s cap on number of awards
- I think the updated limits on apps is a good tweak

**Cost Containment**
- OHFA plans to adjust the limits based on inflation rates closer to final QAP approval in late summer. We believe this is a positive policy change that more accurately captures the current market conditions

**Resyndication**
- Given that a project being re-syndicated is most likely occupied and in need of extensive capital investment, under what pool would the project be submitted?
- We appreciate the clarification that developments previously financed with non-competitive HTC may apply for competitive HTC after their initial 15-year compliance period.

**HTC REQUIREMENTS: BASIS BOOST POLICY**

**Discretionary Basis Boost: 115%**
- While this is helpful for non-urban preservation, we suspect that these projects will still be challenged to score competitively due to the Leveraging category, which seems to conflict with the Hard Cost – Rehab scope per unit category.
- Thank you for a good change by making the 115% basis boost available to non-urban projects who happen to compete in the HUD subsidy preservation pool.

**HOUSING POLICY POOLS**

**Pool Eligibility**
- I would suggest OHFA allow a formal waiver process for applications which do not fit neatly into any one pool. Allowing a waiver process would allow developers to state the reasons they believe their deal should compete in a specific pool and would allow OHFA to make a case by case determination in exceptional circumstances.

**Maximum Per Application**
- Increase the credit cap for mega-metropolitan areas with populations over 300,000 to $1,250,000 in all pools in exchange for greater unit production commitments.

**Urban Opportunity Housing - Amount**
• OHFA should revise the QAP to provide a minimum of 30% of the total allocations for family housing in true opportunity areas (low poverty level and not racially segregated).

Urban Opportunity Housing - Set-Asides
• Add Scholar House Set-Aside in the New Affordability – Urban Opportunity Pool

HUD Subsidy Preservation Pool - Set-Asides
• RAD for PRAC should be added to the RAD Conversion set-aside in the HUD Subsidy Preservation Pool
• Create a second set aside for special needs housing
• Add RAD for PRAC to the RAD Conversion set-aside in the HUD Subsidy Preservation Pool

GEOGRAPHIC DEFINITIONS
Urban/Non-Urban Areas and Pools
• Smaller urban centers are not able to compete against the large urban centers. Proposed recommendations and solution:
  - Allow for unique location-based amenity scoring criteria between the small and large urban centers. An example would be to maintain the 1 mile radius for larger urban centers with higher density, but extend the radius to 5 miles for less dense urban centers.
  - Allow for smaller urban centers to partner with the applicable amenity providers to bring the services directly to the affordable housing community.
  - Allow for the affordable housing community to establish a project based transportation plan that ensures access to the amenities out-side of walking distance at no cost.

COMPETITIVE CRITERIA: GENERAL
Previously awarded census tracts
• Please consider restricting those census tracts that were awarded projects in 2020 from applying in 2021, especially in the New Affordability- Non Urban pool.

Maps
• It would be wiser for OHFA, and easier for those who actually use the maps, to gray out the ineligible area

Tiebreaker
• We suggest that OHFA include RAD for PRAC projects in its unit count carve-out for USDA 515 projects which limits the tiebreaker to 30 units from 50.
• Replace the second tiebreaker with one that furthers OHFA’s strategic objectives to provide housing where it is most needed.

Twinning
• We recommend that OHFA create a path for twinning projects to warrant special consideration in the competitive process by incorporating the twinning financing structure into consideration for strategic initiatives funding.

COMPETITIVE CRITERIA: NEW AFFORDABILITY
Local Partner: In-State Partner
• Remove the “five projects in Ohio” caveat and return the local partner verbiage to that of the 2019 QAP (i.e. Ohio developer and general contractor).
• Consider adding language about employing a local subcontractor since that could benefit the local community and economy.
• Eliminate the unfair competitive disadvantages that favor large developers/companies. Suggestions include:
  - Eliminate the requirement for smaller developers to partner
  - Eliminate the time frame for the look back
  - Change 8609s to PIS to match Appendix C and Change Owner to Owner or developer
  - Allow a waiver to be submitted for the requirement to partner with a local non profit based on experience and or deals that are completed, but have not yet received an 8609.
  - Force all developers regardless of size or if they are a nonprofit or MHA to partner with a local nonprofit
  - “Grandfather” developers that met the criteria for local partner points under the previous QAP under this QAP

Sustainable Development: Green
• We recommend that OHFA increase the available point total for LEED certified projects from five to seven points to maintain the integrity of affordable housing in Ohio.

Integrated Communities: 811 Units
• We support OHFA’s ongoing 811 initiative; however, we encourage OHFA to make participation in the 811 program a threshold component for New Affordability projects rather than a scoring criterion.
• Should this remain a scoring component in the QAP we request OHFA consider the following:
  - Reduce the point value for this criterion to reduce its award impact and allow sponsors the discretion to pursue where appropriate.
  - Provide full point values under this criterion for those projects that maximize the possible points for 30% AMI targeting (15% of total affordable units) and commit to participating in the 811 program within 5% of those units.
• We fully support Integrating Communities, however we propose incorporating language found in the past QAP, that included the Senior Alternate which allowed developments intended and operated for occupancy by persons 55 years of age and older, 10 percent of all units or five units, whichever is greater, are affordable to and occupied by households at or below 50 percent AMI.
• We are excited for the potential inclusion of the Section 811 program. If OHFA receives funds, we recommend implementing a pre-application process similar to prior iterations of the QAP.
• We were glad to see additional points being provided to promote the development of integrated communities for people with disabilities. One issue though, as the QAP currently stands, developers are only able to develop single-bedroom 811 units.9 Many people who may need to use 811 units may be in need of a second bedroom to do things such as storing necessary equipment for their disability, or for a live-in attendant to stay.
• Move the 811 scoring option to Income Diversity and increase the Income Diversity category to 15 points, adding alternative ways to score these points if 811 units are not appropriate for a particular development.
First Draft 2021 Qualified Allocation Plan  
Stakeholder Comments

- How will you handle 811 units if a project has 100% HAP or operating subsidy? In the past I believe you allowed projects in that position to elect to serve more 30% households.
- Allow for projects that have 100% Project Based Subsidy to receive the same points as those selecting 811 Integrated Communities score?

**Income Diversity: ELI Targeting**
- It seems that OHFA has accomplished its goals with emphasizing a greater number of 3BRs, lower income targeting, and leveraging credits. Not clear as to why or how this would/could/should be changed, from a policy perspective.
- We urge OHFA to retain the current breakdown and scoring in the New Affordability Pool in the credits per unit and ELI targeting criteria.
- We strongly urge OHFA to better target ELI households so that housing can truly be affordable to the most vulnerable in our state.
- We’d encourage OHFA to award more points to projects that supply an even greater percentage of units than 15% affordable to and occupied by households at our below 30% AMI

**Income Diversity: Project-Based Rental Subsidy**
- I would ask OHFA to reconsider the sentence “if PBRA is transferred, no more than 50% of the total units in the development can be covered by the contract in order to be eligible for the New Affordability pool.”

**Income Diversity: Average Income**
- What is the policy reason for discontinuing income averaging in Ohio?
- We believe that Income Averaging should remain in the QAP as it is a vital tool creating mixed-income communities and, in areas where 80% AMI is de facto market rate, income averaging is a more effective tool than market rate integration to create truly mixed-income communities.

**Housing Need: Affordable Housing Demand**
- We propose that the 2 point threshold be revised from 90-100 affordable and available housing units to 90 and above.
- We are concerned that this metric may miss the mark from a policy perspective, with clearly defined census tracts identifying housing need and problems. Reflecting on the mapping here, and assuming the intent is to meet the greatest need, definitive lines leave out what is on the other side of the divide/street, on the ground, in a community that may be strongly supportive of and in need of affordable housing. We understand the need for market study or another method or methods might accomplish this goal.

**Housing Need: Severe Housing Problems**
- Ensure this element is measured at the census tract level or lower; if that data is not available, we suggest using a measurement that assesses severe housing cost burden of low-income households or another tool to better approximate severe housing needs.

**Accessible Design: 504 Units**
- We would like to see OHFA encourage the development of 504 Deaf and Hard of Hearing units as well as mobility units.

**Cost Efficiency: Credits per Affordable Unit**
- We appreciate, and support, the clarification of credit per affordable unit to ensure that credits are being allocated efficiently across affordable housing units.
- OHFA should in a similar vein also look at increasing the availability of the amount of "tax credits per unit" applicants are eligible to request. OHFA has kept the $18,000 credits per affordable unit metric to maximize points the same for the last five years, a criteria dating back to the 2016-2017 QAP. We respectfully request OHFA raise the credits per unit scoring metric to maximize the points and align it with the 2015 QAP, where New Construction deals could request up to $19,000 credits per affordable units, and still have maximize points.
- It seems that OHFA has accomplished its goals with emphasizing a greater number of 3BRs, lower income targeting, and leveraging credits. Not clear as to why or how this would/could/should be changed, from a policy perspective.
- Preserved AFF: In the 2020 round, was it possible to be competitive between $12k - $16k per unit? If so, perhaps some sort of adjustment would benefit non-urban preservation projects (‘)? but we aren’t clear what OHFA’s goal would be with an adjustment. Based on our scoring of non-urban preservation projects (2020 QAP), this category, combined with the Rehab Scope category that awards greater points for greater hard costs per unit, essentially eliminated the projects we hoped to preserve from the competition.
- We urge OHFA to retain the current breakdown and scoring in the New Affordability Pool in the credits per unit and ELI targeting criteria.
- Preserved AFF: We suggest that OHFA keep $12,000 per unit as the amount of HTC that equates to 5 points
- Adjust the tiered scoring to permit five points for $20,000 in credits per affordable unit with the other scoring tiers adjusted accordingly.
- Increase Credits per unit Scoring Item. OHFA should talk with syndicators about the current dip in pricing and increase the amount of credits available in each scoring category.

**Cost Efficiency: Leverage**
- Consider adding tax abatements and/or Payment in Lieu of Taxes (PILOT) to the acceptable leveraging source.
- Consider lowering the leveraging percentages of Total Development Costs ("TDC") to achieve the respective 1-, 3-, and 5-point
- Please consider revising the scoring for Leverage to place value on leverage that has already been secured, whether through grant agreement or firm commitment.
- We strongly encourage OHFA to allow capital contributions to the project from owners or co-owners to qualify as a leveraged funding source, especially the co-owner acts as a service provider, and is able to bring in new capital resources outside of traditional housing funds that help make a project financially feasible.
- Additionally, we strongly encourage OHFA to include the net present value of tax abatements to qualify as a leveraged fun
- Remove this category altogether.

**COMPETITIVE CRITERIA: NEW AFFORDABILITY, SUB-POOL PRIORITIES**

**Transit/Transportation**
- Consider allowing the site proximity to a bus stop, similar to the criteria from prior and recent years, as an alternative option to achieve points in this category.
- On-demand for a seniors’ property should be awarded 5 points, putting it on-par with scheduled transportation.
- Also, the text of the QAP states that development-provided transportation has to be “available to residents at least five times per week” but does not specify how many residents nor the mode or suitability of the schedule. We encourage the QAP to reflect the unique needs of a senior’s use of transportation and what a difference it makes when the transportation is on-demand and door-to-door.
• Permit applicants to by-pass the Transportation Connectivity Index by proving that the development aligns with a regional smart growth transportation and/or housing plan.

Education
• We suggest revising scoring criteria to add 2 points for a letter from school with "C" in gap closing for both the Urban Opportunity and General Occupancy pools.
• We offer two approaches to making the Education points more targeted and relevant
  As was used a few years ago, points in the education score category should be based on the performance of specific schools that are proximate to a project, rather than entire school districts
  Alternatively, if development contemplates formally partnering with a school or including a bona-fide education component (child-care, early childhood education, or school partnership in the space, it could also qualify for the points. A project would need to evidence a formal MOU with a credible (as evidenced by Resume) partner to be eligible for these points.

Number of Bedrooms
• It seems that OHFA has accomplished its goals with emphasizing a greater number of 3BRs, lower income targeting, and leveraging credits. Not clear as to why or how this would/could/should be changed, from a policy perspective.
• We urge OHFA to retain the current breakdown and scoring in the New Affordability Pool relating to the number of bedroom:
  • We’d encourage OhFA to award more points to projects that supply an even greater percentage of their units than 15% to be 3BR units or large
  • OHFA should revise the QAP to provide more housing for families with children - including additional incentives for developers to create more 3-bedroom units and unit sizes greater than 3-bedrooms.

Inclusive Tenant Selection Plan
• While we understand that OHFA is trying to clarify the language to better articulate the intent of this criteria, it still reads a bit “clunky”, somewhat confusing, and therefore open to more misinterpretation. It may be easier for both OHFA and the applicant to sign an agreement (similar to last year) that commits the management company to abide by OHFA’s policies for the Tenant Selection Plan
• Thank you for clarifying this section – helpful.
• OHFA should maintain its incentive for Inclusive TSP within New Affordability pools and incentivize the adoption and implementation of Inclusive TSPs within its Preserved Affordability pools.
• We are encouraged by the changes in the TSP policy. We believe the changes make the policy clearer for property owners and managers and benefits potential tenants.

Proximity to Amenities
• In the spirit of keeping with consistency from the 2020 QAP, we suggest keeping the 500 foot buffer
• It is unclear as to why the 2020 allowance for points for “An amenity that is within 500 feet of the required distance …” is being removed. This is a valuable allowance in site identification, given NIMBY, zoning, and other challenges.
• OHFA is requiring the use of its maps to identify amenities for specific sites. The problem, unless OHFA has fixed it, is that the maps require an actual address. In non-urban areas in particular, undeveloped sites often don’t have a numbered address making it impossible to use OHFA’s maps for amenity identification with the requested site specificity
• OHFA is now saying that distance should be measured from the middle of the site. Does OHFA have any guidance on how this might work? Google does not provide lot measurements. Better for OHFA to stick to the distance from the road frontage.
• We would strongly urge OHFA to consider restoring the 500-foot buffer feature of the Proximity to Amenities criteria
• If the buffer language is removed, please confirm that an amenity radius that touches a site will count for points, even if the radius does not hit the middle of the site.
• Pertaining specifically to maps that evidence distance to recreation centers, cultural facilities, and senior centers, we ask OHFA to reconsider new draft language that distance must be measured from the center of a proposed site. For smaller sites, perhaps 5 acres or less, the distance should be allowed to measure from the nearest point of the site to the amenity.

Low Poverty Area
• We suggest the following changes to the Urban Opportunity Pool: Add 2 points for Census Tracts with a poverty rate less than or equal to 25%

Experienced Service Provider
• We appreciate the removal of the requirement to submit a MOU with the preliminary application to meet this criteria. To ensure this criteria remains relevant, we suggest requiring a letter of support from the provider to demonstrate their commitment to the project.
• OHFA’s Enhanced Service and Support Coordination category recognizes the importance of service coordination, and we applaud its inclusion in the QAP.

Appalachian County
• Insurmountable advantage. Option: set aside a certain amount of funding in the non-Urban pool for Appalachia projects
• Insurmountable advantage. OHFA should establish a set-aside for Appalachia. Maybe three projects
• We ask that you either remove the 5 points for Appalachia or put a set-aside cap on the number of Appalachian projects funded in the nonurban pool to give non-Appalachian projects such as ours a chance to be competitive in the 2021 round.

COMPETITIVE CRITERIA: PRESERVED AFFORDABILITY

Local Partner: In-State Partner
• Remove the “five projects in Ohio” caveat and return the local partner verbiage to that of the 2019 QAP (i.e. Ohio developer and general contractor).
• Consider adding language about employing a local subcontractor since that could benefit the local community and economy.
• Eliminate the unfair competitive disadvantages that favor large developers/companies. Suggestions include
  • Eliminate the requirement for smaller developers to partner
  • Eliminate the time frame for the look back
• Change 8609s to PIS to match Appendix C and Change Owner to Owner or developer
• Allow a waiver to be submitted for the requirement to partner with a local non profit based on experience and or deals that are completed, but have not yet received an 8609.
• Force all developers regardless of size or if they are a nonprofit or MHA to partner with a local nonprofit “Grandfather” developers that met the criteria for local partner points under the previous QAP under this QAF
Development Characteristics: Rehab Scope

• On the surface, the italicized language above appears to contradict the requirements for “Substantial Rehabilitation”; Please clarify that 100% of the major building components do not need to be past their effective useful life; they just need to meet the definition of “Substantial Rehabilitation” found in the OHFA 2020 Design & Architectural Standards. In other words, major building components qualify if at least 50% needs to be replaced and the item being replaced has a RUL of 25% or less.
• We strongly support the proposed clarification in the Development Characteristics portion of the Preserved Affordability section that preservation projects proposing demolition and replacement of structures which are no longer viable will receive the full 5-point score under Rehab Scope.

Development Characteristics: Green

• We recommend that OHFA increase the available point total for LEED certified projects from five to seven points to maintain the integrity of affordable housing in Ohio.

Preservation Priorities: Financially-Troubled Asset

• We would propose the deletion of the clause prohibiting related-party sales, and the addition of language under “Submission” that proposals including related-party sales must (1) add new capacity to their team; (2) demonstrate to OHFA’s satisfaction that the property’s financial distress arose despite the owner’s best efforts; and (3) not include distributions of equity to the owner.

Preservation Priorities: Good Management

• Same as above; please clarify that to meet Good Management criteria, the applicant needs to show that no more than three major building components qualify if at least 50% of each item needs to be replaced and the item being replaced has a RUL of 25% or less. This is consistent with the definition of “Substantial Rehabilitation” found in the OHFA 2020 Design & Architectural Standards.
• We would like to see OHFA allow and even encourage submissions from new owners who have recently acquired properties with major capital needs (which would violate the requirement for at least five years’ tenure as owner). Accordingly, we would propose the deletion of the five-year ownership requirement in this section.

Preservation Leveraging: Bond Leveraging

• OHFA should consider allowing applicants to submit only the AHFA and the corresponding conditional financial commitments for the 4% phase at proposal application. If the 9% phase is awarded, then allow the applicant to submit the complete 4% application at the same time as the final 9% application.
• We suggest that OHFA also delay the submission of the following items until the final application of the 9% project: Appraisal, Community Outreach Plan, Condominiumized Space Description, Federal Tax I.D. Number, Legal Description, and Tenant Relocation Plan.
• Please consider revising the qualifying language for 1.a to the following: “The development is currently or proposed to be on a contiguous parcel/site and is part of the same current or proposed development plan as the 9% development; OR”

Cost Efficiency: Credits per Affordable Unit

• We appreciate, and support, the clarification of credit per affordable unit to ensure that credits are being allocated efficiently across affordable housing units.
• OHFA should in a similar vein also look at increasing the availability of the amount of “tax credits per unit” applicants are eligible to request. OHFA has kept the $18,000 credits per affordable unit metric to maximize points the same for the last five years, a criteria dating back to the 2016-2017 QAP. We respectfully request OHFA raise the credits per unit scoring metric to maximize the points and align it with the 2015 QAP, where New Construction deals could request up to $19,000 credits per affordable units, and still have maximize points.
• It seems that OHFA has accomplished its goals with emphasizing a greater number of 3BRs, lower income targeting, and leveraging credits. Not clear as to why or how this would/could/should be changed, from a policy perspective.
• Preserved Aff: In the 2020 round, was it possible to be competitive between $12k - $16k per unit? If so, perhaps some sort of adjustment would benefit non-urban preservation projects (?) but we aren’t clear what OHFA’s goal would be with an adjustment. Based on our scoring of non-urban preservation projects (2020 QAP), this category, combined with the Rehab Scope category that awards greater points for greater hard costs per unit, essentially eliminated the projects we hoped to preserve from the competition.
• We urge OHFA to retain the current breakdown and scoring in the New Affordability Pool in the credits per unit and ELI targeting criteria.
• Preserved Aff: We suggest that OHFA keep $12,000 per unit as the amount of HTC that equates to 5 points
• Adjust the tiered scoring to permit five points for $20,000 in credits per affordable unit with the other scoring tiers adjusted accordingly
• Increase Credits per unit Scoring Item. OHFA should talk with syndicators about the current dip in pricing and increase the amount of credits available in each scoring category.

COMPETITIVE CRITERIA: PRESERVED AFFORDABILITY, SUB-POOL PRIORITIES

RAD/Choice Transformation

• We encourage OHFA to have RAD for PRAC considered for points under the Preserved affordability RAD/Choice Transformation scoring criterion.

Multiphase Section 8 Preservation

• Please consider revising the last sentence of paragraph 3 to the following: “The phases must currently be or are proposed to be contiguous and operated under single management. A project with phases that are currently contiguous may be redeveloped in part on one or more non-contiguous sites, if consistent with a community revitalization plan.”

COMPETITIVE CRITERIA: SERVICE-ENRICHED HOUSING

Service-Enriched Housing: PSH

• We continue to urge OHFA to move toward a cap for disability-only units in large multi-family complexes. We hope that in a future draft of the QAP the 25% floor for disability units will be changed to the ceiling.
• Scattered site PSH: While affirmative incentives are not yet reflected in the QAP draft, we look forward to continued discussions to explore these options for the next QAP.
• We request that OHFA adopt strengthened language, that OHFA “directly and affirmatively seeks to promote the Olmstead and ADA integration principles.” We hope to work with you in the future in the context of the QAP, and would like to discuss whether it is time to consider updating the now 8-year-old Housing Policy Framework to reflect other states’ more recent Olmstead settlement.
Sub-Pool Priority: PSH Only

- We would encourage OHFA to use a communities most recently available published HUD Point In Time (PIT) count instead of the proposed HUD 2018 PIT. At the very least a community should use the 2019 HUD PIT.

APPENDIX C: EXPERIENCE & CAPACITY CHARACTERISTICS

Minimum Eligibility Requirements

- We request that OHFA include 4% HTC 8609s in the eligible requirements for a co-developer/partner
- The following three ideas are aimed at providing 4% participation clarity for "new-to-Ohio" developers
  
We encourage OHFA to waive any potential cap if a "new-to-Ohio" developer is teamed with an experienced Ohio developer, and the "new-to-Ohio" developer has a long track record of successful LIHTC experience and requisite financial strength.

OHFA could create a clear set of past experience standards for "new-to-Ohio" developers that, if achieved, would result in no 4% HTC participation limits.

For "new-to-Ohio" groups that may fall short of the standards mentioned above, OHFA could offer a voluntary, up-front capacity meeting and review that would establish 4% HTC participation parameters such as, “no restriction,” “no restriction if teamed with experienced Ohio partner,” and “limited participation” (with limits defined).