



May 29, 2024

Barbara Richards
4% Housing Tax Credit Section Chief
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

Dear Ms. Richards,

As we prepare for the second year of the Ohio Low Income Housing Tax Credit (OLIHTC), the Ohio Housing Council (OHC) appreciates the opportunity to provide comment on the first draft of the *Ohio LIHTC State Fiscal Year 2025 Guidelines*. As always, we only provide comment on items where there is consensus among our diverse membership.

Two-Step Process for OLIHTC Applications

We strongly support the implementation of the traditional two-step process, where 80% plans are not due until the final application phase. This approach will help reduce unnecessary expenses for applicants who may not ultimately receive funding.

Threshold Deficiency Cure Period

We agree with the inclusion of a two-week threshold deficiency cure period. This will allow applicants to address any minor issues without being disqualified, ensuring that viable projects are not unduly excluded.

Definition of Rural

We appreciate that OHFA has spent significant time and effort in thinking about how to define rural areas of the state with a goal of ensuring that more affordable housing is being developed in locations that are truly rural. While we did not reach consensus on which of the maps is preferable, we are in strong agreement that there should be further discussion about what should be considered when determining whether a location is rural. We stand ready to join in that ongoing discussion.

Underserved Areas as a Scoring Criteria

OHC is supportive of OHFA's goal of "allocat[ing] its limited affordable rental housing resources in a manner that effectively serves all parts of the state." However, OHC strongly suggests a different approach. Rather than making "Service Time" a scoring criterion for all

projects, we believe that OHFA should consider a different approach, such as one of the following options:

- A geographic strategic initiatives set-aside through which OHFA would have discretion to award a project (or projects) in underserved areas.
- A geographic set-aside for underserved areas in which state legislators wishing to have their district be included as an underserved area would submit a request to that effect, with scoring criteria that would differentiate applications within this pool.
- A geographic set-aside for areas of the state that have been determined to be underserved through the use of objective criteria, with scoring criteria that would differentiate applications within this pool.

Thank you again for your tireless effort to revise these guidelines in a continuing effort to improve this vitally important program.

Sincerely,



Ryan Gleason
Executive Director

cc: Shawn Smith, Executive Director, Ohio Housing Finance Agency
Joe Hewitt, Senior Director of Housing Programs, Ohio Housing Finance Agency
Taylor Koch, Director of Multifamily Housing, Ohio Housing Finance Agency