

**TO: All Interested Parties**

**FROM: Ohio Housing Finance Agency**

**DATE: December 20, 2021**

**RE: 2022-23 QAP Frequently Asked Questions**

The following is a summary of questions received in advance of the 2022 Housing Tax Credit (HTC) application deadline regarding the 2022-2023 Qualified Allocation Plan (QAP). The answers clarify the QAP and will be considered during proposal evaluation. Additional questions will be accepted through January 14, 2022. For further information, please refer to the [QAP](#). [MS1]

### **HTC Programmatic Requirements and Oversight: Limits on HCGF**

#### **To be eligible for a HOME HDAP award may the CHDO be a 51% Majority General Partner in the ownership structure?**

No. To be eligible the CHDO must be the sole general partner in the ownership structure.

### **Housing Policy Pool: New Affordability**

#### **Is there a cap on the percentage of 2-BR units in senior housing proposals?**

No, although the amount should not exceed what is supported in the market study.

#### **Is there a cap on the percentage of 1-BR in family housing proposals?**

No, however, there are unit mix requirements if the proposal intends to meet the Revitalization Area Set-Aside.

### **Point Category: Exercise & Wellness**

#### **Does OHFA have a specific number of pieces of fitness equipment in mind per a certain number of units?**

OHFA does not have specific requirements. The fitness equipment must be appropriate and reasonable for the population and building.

### **Point Category: New Affordability: Leverage**

#### **What documentation should be provided for sources not yet conditionally committed at proposal?**

The application should provide a letter from the anticipated source outlining the timeline of the intended award. The award should also be listed as a source on the budget tab of the AHFA.

#### **Does the CDFI need to be a general partner in the ownership of the proposal if funds are awarded?**

No, the CDFI lending to the project need not be a general partner in the ownership structure.

#### **Do grants from the outlined sources qualify as leverage?**

Yes. However, note that grants may not be appropriate due to potentially reducing eligible basis and/or creating taxable income.

**Do construction sources count as leverage?**

No, only permanent sources will count towards leverage.

**The QAP states that points will be awarded on a per-unit basis within the leveraging points category. Does this criteria include market rate units?**

No, only affordable units will serve as the denominator.

**Point Category: Proximity to Amenities**

**Does a primary care facility or urgent care (free-standing or at hospital) count as a medical center?**

Yes, a primary care facility or urgent care may count as a medical center. Emergency rooms do not qualify under this category, but an urgent care at a hospital would qualify. Should a facility not be represented on the OHFA provided map, the applicant should provide documentation that the facility meets the definition and falls within the appropriate distance.

**Is there a “buffer zone” for proximity to amenities?**

We will allow a .05 mile buffer.

**Point Category: New Affordability: Neighborhood Revitalization**

**Can a prior LIHTC award count towards real estate development/community development investment if the project is within two miles of the proposed project?**

No, prior LIHTC investment may not count as real estate development.

**Point Category: New Affordability: CORES or Experienced Service Coordinator**

**In regards to CORES or Experienced Service Coordinator points, is there a weekly on-site time requirement for CORES entities?**

If the proposal is seeking points under CORES there is not a weekly on-site time requirement for CORES entities.

**In regards to CORES or Experienced Service Coordinator points, if contracting with a third-party CORES entity for the duration of the compliance period, must the entity be CORES certified at the time of Proposal Application?**

The CORES entity must obtain certification prior to placing in service. Certification is not required at the time of proposal application. An MOU with the third-party should be provided at proposal application.

**Point Category: New Affordability: Senior Center**

**Is a public senior center that charges a \$5 annual fee eligible for amenity points?**

A \$5 annual fee qualifies as nominal.

**Point Category: Preserved Affordability: Need for Replacement**

**If “Need for Replacement” points are not being pursued, does a new construction Preserved Affordability proposal need to maintain the same number of units as the housing being replaced?**

The other three point scoring options do not include a unit replacement requirement. However, the project must continue to be eligible under Preserved Affordability.

### **Point Category: Preserved Affordability: Experienced Ownership**

**Since the General Partnership can be made up of more than one general partner, can their ownership interests be combined to meet these points?**

No, the experience of multiple general partners may not be combined to meet the requirements for competitive points.

### **Point Category: Preserved Affordability: Subsidy Preservation**

**If a project has existing USDA 515 could it qualify for (c.) Year 30?**

No, the project may not compete for Year 30 points if it has an existing USDA RD Section 515 loan.

**Are projects with prior affordability restrictions from OHFA's HDAP program precluded from qualifying for points under (c.) Year 30**

No, projects with prior income restrictions from OHFA funding sources are eligible.

### **Point Category: Service Enriched Housing: Expert Recommendation**

**What does "no affiliation" intended to mean as it pertains to proposals with a letter of support outside of a Continuum of Care?**

The letter of support may not be from an organization affiliated with any member of the development team (i.e. Developer, Co-Developer, Consultant, Owner). There is no way for OHFA to define all possible forms of affiliation in advance and will make determinations based on the available facts.

### **Appendix C: Experience & Capacity Characteristics**

**May developers who have not received three 8609s 9% HTC in Ohio in the past ten years (but meet minimum eligibility requirements for 9% HTC) serve as a co-developer for an entity not meeting minimum eligibility requirements for 9% HTC?**

No. Under Appendix C: "Only developers that have received Ohio 9% HTCs and received 8609s for at least three projects in the past 10 years are eligible to serve as a co-developer/partner entity to those applicants not meeting the 9% HTC minimum eligibility requirements."