OHIO HOUSING FINANCE AGENCY

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TO: **All Interested Parties**

FROM: **Ohio Housing Finance Agency**

DATE: **October 1, 2018**

RE: **2019 QAP Frequently Asked Questions**

The following is a summary of questions received in advance of the 2019 Housing Tax Credit (HTC) application deadline regarding the 2018-2019 Qualified Allocation Plan (QAP). Questions were edited for style, to remove identifying details, and to combine similar remarks from different organizations. The answers posted herein clarify and modify the QAP and will be considered during proposal evaluation. Additional questions will be accepted through December 28, 2018. For further information, please refer to the **QAP** and **Public Comment Summary**.

Contents

General and Pool Question

How old can the market study be at proposal?
The market study must be updated or approved within 12 months of the proposal application submission date.

How old can the physical capital needs assessment be at proposal?
The physical capital needs assessment must reflect current building conditions; there are no other timing requirements. Applicants are responsible for ensuring that the document is current and may wish to verify the physical conditions prior to submission.

How old can the zoning letters be at proposal?
The proof must reflect that current zoning will permit the proposed development; there are no other timing requirements. Applicants are responsible for ensuring that the document is current and may wish to verify the zoning remains accurate by comparing against local records.

If a development condominiumizes commercial space, which will be developed by a different entity, must we have a co-developer agreement with that entity?
No, the co-developer agreement is only required if co-developing the HTC proposal. Prior to submission, applicants are encouraged to contact OHFA to discuss all unique developments opportunities that involve multiple parties or complicated financing structures.

If seeking a parking variance from local government, when must that be submitted to OHFA?
Parking and other local permitting variances do not need to be submitted to OHFA unless requested during the architectural review.

What pool will a project that mixes existing subsidized housing with never-before subsidized units compete in?
It will compete in the pool where the majority of units qualify. If the majority of units are currently subsidized as set defined in the QAP, it will complete in a preservation pool. (*Note: this answer was first provided in 2018 and is not changed*.)

How can I determine if a management company is on the "OHFA Watch List"?
This list is no longer maintained; OHFA will not evaluate that item and, therefore, no verification is required.

FHAct50 Building Opportunity Fund

Will you please define the phrase "newly constructed" for leveraging purposes?
OHFA's intention is to promote mixed-income development by pairing affordable housing with concurrent investments in new, market-rate development. In its sole discretion, OHFA will liberally construe this phrase to achieve those purposes. OHFA will review for eligibility the following non-exhaustive list of development types: new construction; "gut rehabilitation" as defined in the Design & Architectural Standards; "substantial rehabilitation" as defined in the Qualified Allocation Plan; the adaptive reuse of non-residential structures; and/or the demolition and rebuilding of vacant buildings that were not habitable. Moderate rehabilitations will not be considered.

Developments involving any element of rehabilitation or repair of existing structures must be supported by clear evidence demonstrating that the construction will result in a housing unit that was not recently available for residential purposes at any income range.

811 Project Rental Assistance Program

Can 811 be placed into projects that are in the extended use period?
Yes. You can learn more online here: **http://ohiohome.org/ppd/ohio811.aspx.**

Point Category: Collateral Investment

Does funds expended for demolition and/or grading of commercial or residential buildings count?
Yes, provided the investments must have a clear and proximate benefit to the local residents or community.

Point Category: Transit

Will OHFA accept a "non-public" transit stop or facility?

No. (*Note: this answer was first provided in 2018 and is not changed*.)

Archived FAQ from 2018 Funding Cycle

ARCHIVE: General and Pool Question

Is DevCo required for 2018 applications?
No.

Can applicants use either Google Earth or Google Maps to show distance to the site for various scoring criteria?
Yes.

What pool will a project that mixes existing subsidized housing with never-before subsidized units compete in?
It will compete in the pool where the majority of units qualify. If the majority of units are currently subsidized as set defined in the QAP, it will complete in a preservation pool.

Can a development in a High or Very High Opportunity urban census tract elect to participate in either the Opportunity or General Occupancy Urban Housing pools? What if the high opportunity site is subject to a revitalization plan?
No. High and Very High Opportunity urban developments must compete in the Urban Opportunity Housing pool. This is also true if the high opportunity site is in a revitalization area.

Can townhomes compete in the Single Family pool?
No. Only detached single family homes may compete in that pool.

Can a development be located on two different sites that are not contiguous?
There is no current QAP prohibition on a two-site development type.

When is the Affirmative Fair Housing Marketing Plan due?
It is due at 8609, unless required earlier for a scoring category (ex. MHA Waitlist).

When is the Supportive Services Plan (SSP) due?
Except for Service Enriched pools, the SSP and all provider agreements are due at 8609, unless required earlier for a scoring category. For Service Enriched pools, the SSP is due at Proposal Application, with all local service provider agreements due at 8609.

When do scattered site developments have to complete public notification of elected officials?
Per the **Ohio Revised Code §175.07**, all public notification must be completed before OHFA approves any funds, including by executing a Carryover Agreement. Accordingly, scattered site developments must complete the public notification process for all sites by November 9, 2018, and no changes can be made to the site locations after the Carryover is issued. Any increase to the number of units or sites requires re-notification.

Do the competitive application workbooks need to be printed?
No. Only the following documents must be submitted in hard copy (1) three folders for Site Visit Information and (2) the Architectural Plans; all other documents must be in electronic format. ***2019 Update: a physical site visit folder is not required.***

Is self-syndication prohibited?
No. Please note that OHFA reserves the right to request additional information to support any credit or equity pricing that does not align with current market rates. For all equity prices significantly above or below the pool average, if sufficient reasoning is not provided for the price, OHFA reserves the right to underwrite to the pool equity pricing average. See the QAP and Underwriting Guide for further information.

If an application does not receive a set-aside, will it continue to be considered for the broader pool?
Yes.

For the Development Team Experience and Capacity Review, where the applicant has developed five or more competitive HTC developments in the last ten years, must the Management Company or General Partner still report their experience?
Yes. If needed, additional experience many be submitted in a separate worksheet outside the AHFA containing all column headers provided in the AHFA.

Are audited financial statements required for the Development Team Experience and Capacity Review?
No.

For the Development Team Experience and Capacity Review, if a management company had significant experience, but then suspended operations for a number of years before reentering the market, will OHFA consider that older experience?
This is a fact-specific situation and the development team is encouraged to work with the Office of Program Compliance for an individualized response. The management company capacity review will primarily focus on recent experience. Management companies that lack recent experience will be required to attend training hosted by the Office of Program Compliance.

What does the 25 page limit apply to?
Supporting documentation shall be limited to 25 pages per competitive criterion section (identified by blue headers), excluding specifically specified, mandatory documents. For example, all supporting documentation for all Impact Initiative categories cannot exceed 25 pages.

What is a Memorandum of Understanding (MOU)?
Frequently, a MOU represents an agreement to enter into a contract at a later date and contains only the basic terms of the proposed partnership. Applicants should consult with an attorney for further guidance.

Is a capital needs assessment required for existing buildings that will be demolished?
No.

ARCHIVE: Competitive Application Limit

Will OHFA permit exceptions to the competitive application limit for inexperienced developers if the lead staff have considerable HTC experience working for other entities?
No.

If a first-time HTC awardee receives 9% credits, can it seek a 4% award later that year without seeking an exception to the competitive application limit?
Yes. These are competitive application limits only.

To qualify for the "Capacity Building Partnership" exception to the competitive application limits, must the entity that does not possess the minimum experience and capacity requirements have an ownership interest in the development?
No, they only need to be a co-developer. However, if that entity is seeking to become a Community Housing Development Organization (CHDO) for future proposals they will need to gain ownership experience separate and apart from development experience.

To qualify for the "Capacity Building Partnership" exception to the competitive application limits, must the entity that does not possess the minimum experience and capacity requirements meet the CHDO elements?
No, you do not need to meet the CHDO elements if you are only seeking an exception to the competitive application limit. Those CHDO elements are required to obtain the Developer Fee supplement.

Will OHFA grant all Capacity Building Partnership exception requests that it receives?
No. This is a highly fact-sensitive determination for which OHFA has retained exclusive discretion. Interested developers must begin working with Operations Manager Karen Banyai immediately to discuss whether their proposal will be eligible. Significant emphasis will be on whether or not the partnership is likely to expand the pool of highly-qualified developers working within the tax credit programs. Partnership where the non-lead entity does not gain substantial experience or play a meaningful role in the development process will not be granted an exception.

How much of the developer fee must each co-developer receive in a Capacity Building Partnership?
OHFA does not prescribe how co-developers divide developer fees.

ARCHIVE: Developer Fee

If developer consultant fees, construction management fees, guarantee fees, developer asset management fees and financing fees charged by the developer are not listed in the developer fee line item on the AHFA, are they still subject to the $1.75 million cap?
Yes. ***2019 Update: OHFA has now clarified the difference between a Developer Support Budget and a Develop Fee; see the full QAP for further guidance.***

Is developer fee earned for market rate units?
No, the per unit calculation is for affordable units only.

To obtain developer fee supplement for prevailing wage, when must the Applicant submit proof of a legal requirement to pay Davis Bacon or Ohio prevailing wage rates?
Proof must be submitted at proposal application, located in the Competitive Support Documents folder.

Are exception requests required to obtain any developer fee supplement?
An exception request is only required for "Engaged in Capacity-Building Partnership". Please note, to receive points for Supporting Integrated Communities, OHFA pre-approval is required.

May an applicant seek less developer fee than the QAP permits?
Yes, the base fee plus supplement represents only the maximum amount of fee a developer may seek.

ARCHIVE: Basis Boost

To receive 115% boost, how many bullet points on page 34 must an applicant satisfy?
Applicant only needs to satisfy ***either*** (1) Developments competing in the Non-Urban Housing and Non-Urban Subsidy Preservation pools; ***or*** (2) Developments in the New Affordability pool in which 25 percent or more of units are affordable to ELI households, ***or*** (3) Developments that promote market rate integration by providing 15 percent of units that are not income restricted.

ARCHIVE: Cost Containment

Can a New Affordability, Senior Urban Housing proposal have a higher cost cap if it is adaptive reuse?
No.

Do the cost containment requirements apply to individual units or total square footage?
Developments must adhere to both the Total Development Cost per Unit *and* the Total Development Cost per Gross Square Foot limits. Also see: **Design & Architecture** section.

ARCHIVE: Credit Gap

Can you request both HOME and Ohio Housing Trust Funds in the 9% Credit Gap program?
No.

To receive HOME funds, must the development be 100% owned by the CHDO?
The development must be "sponsored", meaning owned or owned/developed by a non-profit housing development organization, which will certify as a state-certified CHDO. See the QAP for full Housing Credit Gap Financing requirements and the HOME rules regarding "sponsor" as set forth in **24 CFR 92.300**.

ARCHIVE: 811 Project Rental Assistance Program

Where can I find more information on the 811 program?
You can learn more online here: **http://ohiohome.org/ppd/ohio811.aspx**

If submitting multiple applications, all of which are seeking points for "811 Double-Down", can we reuse the same developments for each application?
No. Each application must have two unique 811 commitments to achieve these points. For example, if submitting four HTC applications (all of which are seeking 811 Double Down points), you are required to commit eight unique developments to participate in the 811 program.

What if our request for pre-approval is denied because the development is not eligible?
You are encouraged to submit preapproval commitment early to ensure that you have sufficient time to identify and seek approval for a replacement should it be necessary. You may contact our 811 team to discuss project qualifications prior to submitting a preapproval commitment.

Will pre-approval decisions be issued on a rolling basis, or will all decisions be announced on February 9th?
Decisions will be made as soon as possible, on a rolling basis. February 9th is only the latest date OHFA commits to competing that review process.

If an applicant commits a portfolio project to the 811 program, but the proposal application is not selected for tax credits, can it withdraw the portfolio project from 811 consideration?
No. Withdrawing a portfolio 811 commitment because the proposal application is not permitted and will demonstrate a lack of experience and capacity for future applications. However, you may "reuse" 811 commitments that were associated with an unsuccessful tax credit application again in the 2019 tax credit application round.

Do Existing Portfolio Units need to have common GP ownership as the proposal application? Common management company?
Applicants must be in a position to control the actions of the existing HTC development and ensure adherence to the 811 Program requirements. It is likely that this control will be demonstrated by a managing general partner interest or a managing member interest in the existing HTC development, but OHFA will consider alternative proposals. Possessing a common management company is not sufficient to demonstrate this control. Note that all 811 units must meet the program's eligibility requirements, including that they must be within an existing HTC development.

If we have 60 units, how many 811 units do we need to commit to receive both "Supporting Integrated Communities" and "Double Down" points?
You must commit to and receive pre-approval for a number of units equivalent to ten percent of the proposed development (or 5 units, whichever is greater) to get points for "Supporting Integrated Communities." In this example, that requires applicants to commit to six 811 units.

You must commit and receive pre-approval for an *additional* ten percent or 5 units, whichever is greater to get points for "Double Down". Again, an additional six units in this scenario.

These twelve combined units must be in two separate developments, one of which may be the proposed development provided it meets all programmatic requirements. You may commit more than twelve units, but are not required to do so to earn points.

Can we concentrate all 811 "Double Down" units into one development, or do they need to be in two separate?
They must be two separate developments. This is required to achieve broader geographic distribution of the 811 units and to promote additional community integration for persons with disabilities.

Can we spread all 811 "Double Down" units across more than two developments, like three or four?
No. The 10 percent of units must be concentrated in two developments only. You are permitted to enroll additional developments in the 811 program outside the QAP point system.

Can we submit two-bedroom units for 811 consideration?
No. At this time, OHFA is not accepting two-bedroom units. OHFA reserves the right to amend this unit mix in its sole discretion based on programmatic need.

What environmental requirements apply for the 811 program?
Information on the environmental requirements can be found online. If you have additional questions, please contact our 811 team.

For proposal units, the final unit count is still subject to change. How many units should we seek preapproval for?
You should seek preapproval for the largest number of units that you believe may be required to secure points. You will be permitted to lower the commitment number to match the QAP requirements should the unit count drop prior to proposal submission.

For proposal units, the final ownership is still subject to change. Who should we seek preapproval for?
Indicate the ownership information for the proposed development on the 811 Proposal Development Application as it is currently comprised. The applicant may update this information once the ownership is finalized.

In the pro forma, what is the "AMGI Occupancy Percentage" for 811 units?
811 units are hard-coded into AHFA. You ***must*** use the last four lines in the Annual Gross Project Income Calculation chart in the Budget & Costs tab of the AHFA to identify these units. These lines will auto-populate to reflect that the units are "Affordable to" 50% AMGI and "Occupied by" persons at 30% AMGI.

Do 811 units within the proposed development count as "ELI" for tiebreaker purposes, even if the development receives subsidy to 50% AMI?
Yes.

Do 811 double-down units provided at a *different* development count as "ELI" for tiebreaker purposes?
No. The tiebreaker only measures the number of ELI units at the proposed development, not off-site.

If our development was previously qualified for 811 during the 2017 application period, but was not funded, do we still need to seek pre-approval?
Yes. You must have the pre-approval letter which did not exist last year.

If one of our portfolio developments already agreed to participate in the 811 program, can we "count" that for either of the 811 point categories?
No. Developments that have either a commitment letter dated prior to September 18, 2017 (the date on which the QAP was approved) or an Agreement to Enter into a Rental Assistance Contract. Moreover, the development may not have been previously used for competitive consideration in a different funding program.

Are properties that are age-restricted to individuals aged 55 and over eligible for 811?
Yes, however, only persons aged 18-61 may participate in the 811 program. You cannot deny tenancy to an 811 participant because they are not aged 55 or older. The Housing for Older Persons exemption to familial status discrimination requires that at least 80 percent of the occupied units be occupied by at least one person 55 years of age or older per unit. As such, 811 participants may occupy either the 80 percent of age-restricted units if they are over age 55 or the remaining 20 percent of units if they are under age 55.

May a project have both 811 and ODMSD?
No, you may not have both 811 and ODMSD.

May a project that initially elected to participate in 811 switch to ODMSD?
While similar, these programs have important distinctions that make "swapping" units difficult. If an 811 commitment is no longer feasible, contact our 811 team to explore options. Please see the below FAQ regarding ODMSD's ineligibility for points.

May a project substitute ODMSD for 811 for points?
ODMSD units do not qualify for "Supporting Integrated Communities" or "811 Double Down" points. ODMSD units also cannot be used to supplement subsidy preservation in the Preservation Sub-Pool Priority sections. However, ODMSD units are affordable to households at 30% AMI and, therefore, are considered as ELI in the Tiebreaker #2 Composite Formula.

Can existing developments with little or no current vacancy participate in 811?
Yes. After enrollment, 811 units can be filled with eligible residents upon turnover.

For existing portfolio projects, can 811 be used on units that are currently restricted to either 30, 50, or 60% AMI?
Yes. 811 units are compatible with all HTC occupancies and rent restrictions.

ARCHIVE: Point Category: Local Partners

Can an infant mortality partner also acquire a 25% general partnership interest and also act as the "Non-Profit Partner" under the Local Partners section?
Technically, yes. However, it is incredibly unlikely that a partner can demonstrate both the subject matter expertise in infant mortality prevention and a history of providing housing or supportive services to the entire target population. If you believe this applies, you are strongly encouraged to consult with OHFA before submitting your application. Also see: **Infant Mortality Prevention** section.

Does a nonprofit partner need to be located in the same city as the development site to be considered "local".
No. The applicant must demonstrate that the nonprofit partner has a history of providing housing or supportive services for the target population in the target area; however, their main office does not necessarily need to be located in the same city or state to meet this criteria.

Can a nonprofit be related to a government entity and still qualify, like a Community Improvement Corporation (CIC) or a nonprofit that is affiliated with a Metropolitan Housing Authority (MHA)?
Provided the nonprofit "can demonstrate a history of providing housing or supportive services for the target population in the target area," OHFA does not have a preference for the type of nonprofit. A CIC or MHA-affiliated entity that meets these requirements is eligible.

To qualify for In-State Partner points, must the General Contractor ("GC") already be selected, or can the developer simply commit to using an in-state GC?
The General Contractor does not need to be selected. If the GC is not selected at the time of proposal application, OHFA will accept a commitment on the developer's letterhead to select only an in-state GC; a successful application shall submit a letter from the GC, on that GC's professional letterhead, attesting to their qualification under this criteria at final application. Failure to honor this commitment may result in any of the Penalties identified in the QAP.

Can the developer serve as the "Non-Profit Partner"?
The Non-Profit must provide supportive services to the development. They may also hold other roles on the development team, including developer.

Can an "In-State Partner" be headquartered outside Ohio if it has the development office/entity in the state of Ohio? Can a business "reside in" Ohio if it is headquartered located elsewhere?
No. Businesses must be headquartered in Ohio; individuals that are not affiliated with business entities may reside in Ohio.

Where is a businesses' headquarters located?
For these purposes, headquarters are the place where a company's executive offices and executives' direct support staff are located.

If there are two co-developers, do both need to be headquartered in Ohio to receive In-State Partner points?
No, only one needs to be headquartered in Ohio to be eligible for points under this section.

ARCHIVE: Point Category: Neighborhood Initiatives Program

Are the Neighborhood Initiative Program (NIP) point categories different for new affordability versus preserved?
Yes. Developments competing in the new affordability pools are incentivized to incorporate a NIP-funded parcel in their proposal; developments in the preservation pools are incentivized to locate within a NIP target area.

Will OHFA release a list of all NIP Target Areas?
No, these target areas are defined at the county level and are subject to change. You must contact the county land bank to learn more about their current target areas and ensure that no changes are contemplated that would affect point eligibility. Location within a target area will be independently confirmed by OHFA during underwriting.

Can developments in the Recovery Housing pool substitute an MOU for referrals from the ADAMH Board instead of the Continuum of Care in the "Local Partners" section?
Yes.

ARCHIVE: Point Category: MHA Waitlist Priority

Where should the Affirmative Fair Housing Marketing Plan be submitted in the supporting documents?
It must be in the Competitive Supporting Documents folder(s).

ARCHIVE: Point Category: Education

The QAP's Education section only sites the 2015-2016 Ohio School Report Card data, but the 2016-2017 information was recently released. Will OHFA also permit applicants to use the new data?
Yes. OHFA will accept either 2015-16 or 2016-17 ratings at the applicant's election.

ARCHIVE: Point Category: Campus-Based Care

Will OHFA accept VA subsidies in lieu of Medicaid waivers or occupancy?
Yes, provided the applicant can demonstrate that 25 percent or more of units are exclusively reserved for or currently occupied by low-income persons (those earning 60 percent or less of the Area Median Income). Proof may include a letter from the healthcare provider verifying low income occupancy.

Does "part-time healthcare service" mean 20 hours per week or more?
Yes.

ARCHIVE: Point Category: Anchor Institutions

What is the policy intent of the Anchor Institutions category?
The purpose of this category is multifold and includes:

- Creating access to emerging neighborhoods that have a permanent shepherd for growth leading redevelopment;
- Promoting job access, particularly those with entry level positions and advancement potential;
- Preserving affordability where gentrification is a risk;
- Leveraging changes to healthcare regulations that require greater institutional investment in neighborhoods; and
- Capitalizing on regional assets for the secondary benefits they can deliver to the micro-community, like enhancing the quality of primary and secondary education.

Many businesses are located in corporate parks or commercial districts, how can they qualify as "Anchor Institutes"?
The entity must have a specific endowment or philanthropic component whose mission includes community development for the area in which the institution is sited. Entities that are sited in commercial areas are unlikely to have this component and, therefore, would not qualify for points. Hospitals and educational institutions are more likely to qualify for these points. The "component" must be a specific, established, and formally recognized vehicle like a nonprofit organization, community partnership, or program whose community development purpose is evidenced in its mission. Indirect community benefits raising solely from proximity to the institute are insufficient.

The following are examples of anchor institutes that meet this definition: **Medical**, Nationwide Children's Hospital Healthy Neighborhoods Healthy Families. **Educational**, the Ohio State University's Campus Partners. **Corporate**, the Nationwide Foundation's Community Impact Model.

ARCHIVE: Point Category: Home Health Agency Access

Will OHFA allow applicants to substitute a Home Health Agency that is greater than five miles from the development site if they also provide proof that a further agency will serve the area?

Yes, only if the applicant provides a letter on professional letterhead from the agency stating that they currently serve Medicare/Medicaid patients in the development area and do not charge out-of-pocket travel costs. Applicants must also provide the web-search query and map showing actual distance to the development.

Will OHFA accept a home health agency that is not listed on the Department of Health's website?
No.

ARCHIVE: Point Category: Transit

Will OHFA accept a "non-public" transit stop or facility?
No.

ARCHIVE: Point Category: Green

Is any documentation required at proposal to obtain the Green points?
No, evidence of certification is required at 8609.

ARCHIVE: Point Category: Exercise and Wellness

Can an outdoor fitness or recreation area be off-site but accessible to residents?
No. This element must be included within the development and must be documented on the architectural plans. These facilities may be made available to the general public at the development team's discretion.

Does a telehealth clinic satisfy the "on-site, dedicated health clinic" component?
Yes. For these purposes, telehealth is the use of electronic information and telecommunications technologies to support long-distance clinical health care, patient and professional health-related education, public health and health administration.

Can an applicant propose a $10,000 recreation area *and* a $10,000 health clinic to satisfy this requirement?
No. The investment threshold is intended to produce quality health facilities which cannot be similarly achieved by dividing the resources in half.

May a developer pursue these points if similar amenities are already accessible to residents?
No. However, this category may offer an opportunity to create, expand, or renovate facilities to increase accessibility for disabled residents or other target populations could not previously utilize the area; such an expansion would not be duplicative.

For scattered site developments, can the exercise facilities be in one location easily accessible to all residents?
Yes.

Do health clinics also have to have a minimum $20,000 investment, or is that only for fitness space?
Yes, it applies to both.

ARCHIVE: Point Category: New Market Tax Credits

Will OHFA accept a summary letter from the CDE describing the credit allocation, allocation date, and project site in lieu of the full commitment letter?
Yes, provided the letter comes from the CDE and includes all details confirming eligibility under the QAP.

ARCHIVE: Point Category: Historic Tax Credits

Must all buildings in the proposed development be eligible for National Registry of Historic Places (NRHP) listing, or only all buildings that receive the historic tax credits?
This includes all residential buildings in the project, regardless of their funding structure. Please note that the QAP only requests all sites must be NRHP eligible, not that they be currently listed; evaluation criteria ore available online **here**.

Is the Part 1 due to the State Historic Preservation Office by December 1 if you are not seeking historic tax credits?
No, that deadline is only required if the applicant is seeking historic tax credits.

Our property is individually listed on the NRHP, meaning we do not need to seek a Part 1 from OHPO to obtain historic tax credits; does OHFA still require a Part 1 submission to obtain points for historic credits?
No. Instead you must provide proof that all residential buildings are currently listed on the National Register of Historic Places.

ARCHIVE: Point Category: Collateral Investment

If an investment was already committed, but is still under construction, can I count it in both the 2013-2017 and 2018-2020 categories?
No. To count as a past investment, it must be "completed", not under construction. Applicants can never "double count" investments.

Are all HTC funds excluded from collateral investment consideration, or only Competitive HTC projects?
All HTC developments are excluded.

Do renovations made by a MHA count?
Yes, renovations are an eligible activity provided they were not made as part of a LIHTC project.

Does EPA dump clean-up count?
No. That is not a "real estate development and/or infrastructure investment".

How will multi-phased developments that are partially completed be treated?
The developer may elect to count completed phases of a multi-phase development in either the 2013-2017 "Completed" category or the 2018-2022 "Committed" category, or split between both, provided the investment is not "double counted".

ARCHIVE: Point Category: Risk of Market Rate Conversion

What guidance can you provide to Market Study providers in reviewing Risk of Market Rate Conversation criteria?
This criteria compares the maximum allowable 60% Area Median Income rent for the proposed development to the achievable market rent for units of an equivalent bedroom size. This does *not* compare the typical or average rent that an affordable housing development is receiving in the area, which may be below the maximum rent allowable. Another phrasing of the QAP criteria is: Affordable Rent Advantage = 1 – (the maximum 60% AMI HTC rent at the site / achievable market rents) * 100.

Because this calculation is based on the study's determination of achievable market rent, the discussion of the methodology and comparables used to establish it must be clearly outlined in the market study.

ARCHIVE: Point Category: Revitalization Plan

Is a revitalization plan required in order to obtain the Qualified Census Tract or Difficult Development Area basis boost?
No.

Can the scope of the revitalization plan encompass the entire city?
Yes.

Must the revitalization plan use the phrase "affordable housing"?
No. There is no precise language that must be used, provided the document meets the QAP requirements.

Can a Revitalization Plan's implementation measures be contained in a separate document, like a masterplan?
Yes.

Where should the revitalization plan be contained in the application?
It must be in #31, the Revitalization Plan component.

ARCHIVE: Point Category: Underserved Area

If a family preservation deal was awarded between 2016-2017, is a family new affordability deal still considered "underserved"?
No, OHFA only looks at population served when determining if a county is underserved. It does not consider whether past awards were new affordability or preservation.

ARCHIVE: Point Category: Non-Food Desert

Where can an applicant find information confirming that a grocery accepts either SNAP or WIC?
OHFA does not require this confirmation to come from any specific source and will instead accept any reliable information the applicant provides. For reference, the USDA provides a list of SNAP-approved vendors online here. Be advised that this may include non-grocery retailers or vendors who do not offer fresh food; the applicant is responsible for ensuring all elements of the QAP criteria are satisfied. OHFA is not aware of a statewide, online WIC-approved vendor list. ***2019 Update: this documentation is no longer required; see the full QAP for further guidance.***

Is proof of accepting SNAP or WIC required for the Non-Food Desert category in the General Occupancy pool?
No, that is only required in the Urban Opportunity, Non-Urban, and Service Enriched pools. ***2019 Update: this documentation is no longer required; see the full QAP for further guidance.***

ARCHIVE: Point Category: Health Care Access

Will OHFA accept a medical campus that is not listed on the Department of Health's website in lieu of a registered "hospital"?
No.

Will OHFA accept a free clinic that is not listed on the Ohio Association of Free Clinics' website?
No.

ARCHIVE: Point Category: Infant Mortality Prevention

What is the minimum term for the infant mortality prevention partnership?
The terms of that partnership will be determined by the community's need and the partner's expertise. The QAP does not contain a minimum term length. Also see: Local Partners section.

Does the infant mortality prevention partner require OHFA pre-approval before submission?
No. However, if you are uncertain whether the partnership entity will qualify to receive points, you may contact OHFA at QAP@ohiohome.org to verify before submission.

When must the payment be made to the infant mortality prevention partner?
The terms of that partnership will be determined by the community's need and the partner's expertise. The QAP does not specify whether should be made in lump sum or in installment.

ARCHIVE: Point Category: Market Rate Integration

How can a single-family, scattered site development ensure that market rate units are distributed proportionately throughout each building and each floor?
All developments must adhere to IRS and other legal requirements regarding the integration of higher income units. Whether market rate units are sufficiently integrated in a fact-specific determination that must be conducted on a case-by-case basis. Single family, scattered site developments that geographically concentrate low-income units separately from market rate units are unlikely to satisfy integration requirements for the purposes of this point category.

For lease-purchase developments, can the market rate units be eligible for sale to residents at Year 16 for the same rate as the subsidized properties?
Yes.

For single-family developments, does the development need to maintain 15% of the units at a market rate for compliance period, or can the commitment increase or decrease?
At least 15 percent of units must remain non-rent restricted for the full compliance period unless released through the lease-purchase process.

ARCHIVE: Tiebreakers

In achieving geographic parity, will OHFA only "skip" applications where higher scoring projects satisfied the quota within only the sub-pool, or across all pools?
This is implemented in each sub-pool. For example, Dayton can receive one allocation in each Urban Opportunity Housing, General Occupancy Urban Housing, and Urban Senior Housing. But they cannot receive two Urban Senior Housing awards unless all other cities that applied in that pool already received one award (or two awards for Cleveland, Cincinnati, and Columbus).

Does developer fee that is foregone (as opposed to deferred) count against the 15% deferred developer fee amount?
No. This only measures the amount of fee that is deferred as a percentage of the entire fee the entity is eligible to receive.

Does tiebreaker number one apply to all units, or only affordable units?
Tiebreaker number one measures all units in the development.

For the tiebreaker "Developments with other funding requiring affordability restrictions beyond 30 years", can the "other funding" be a loan from the owner to the development?
No, all "other funding" must be from an independent third-party source.

How much can the composite score decrease between final application and proposal?
Between proposal application and final application, the variables of the second tiebreaker may change, but the composite score cannot decrease. There is no threshold for error at final application.

ARCHIVE: Design & Architecture

Will OHFA accept a link to a file transfer protocol (FTP) website where plans can be downloaded?
No. For security purposes, OHFA will not access a third party FTP website.

How is "circulation space" defined?
For all definitions, see the Architect Certification and the Design & Architecture Guide. The Building Owner Management Association definition applies.

How is "support space" defined?
For all definitions, see the Architect Certification and the Design & Architecture Guide. Support space includes electrical, mechanical, elevator room, sprinkler room, janitorial, trash, maintenance, and storage space that is not for tenant use.

How is "net rentable square foot" defined?
For all definitions, see the Architect Certification and the Design & Architecture Guide. Applicants are encouraged to consult with the OHFA Architect for further guidance on square footage calculations. Architect guidance regarding the following topics is provided below:

- **Wall thickness**. Building Owners and Managers Association (BOMA) defines wall thickness two different ways. The method OHFA uses for multitenant building is the "Multi-unit Residential Buildings Standard Methods of Measurement" using the Gross Method aka Method "A". This allows the area calculations to use outside face of structure (sheathing) or outside face of brick to corridor side of residential unit walls. See BOMA publication Z65.4-2010 illustrations 1, 2, 4, 5, 7, 8, 10, 11.

- **Exterior storage, porches, enclosed balconies, or patios**. BOMA definitions are used in the Architect's Certification (see comment sections, identified by small red corner of each cell). Patios without roofs or foundation structures (like concrete flat work such as sidewalks) do not qualify for as eligible basis area.

- **Common areas**. BOMA definitions for common area were modified by OHFA and divided into four basic categories:

    a. **Dedicated Program Space** is a room or space outside the residential living unit designed exclusively for tenant use that has a fixed, program-driven purpose. Examples include but are not limited to counseling space for adults and children, wellness and health clinic areas, and day care centers.

    b. **Common Area, Public** includes public restrooms, community rooms, libraries, offices, meeting rooms, public TV rooms, kitchens (public/ community room), car canopy, portico, fitness rooms, laundry (public), porte cochere, and areas dedicated for mailboxes.

    c. **Common Area, Circulation** are public hallways and corridors to residential units

    d. **Limited Common Area, Private** are exterior spaces with access only through residential units including balcony/porch/deck (patios without roof are not included, see construction cost detail, on site improvements)

- **Finished basement common area**. Finished basement common area is common area as defined above. Common area is not floor-level specific. Basement cells on the Architect Certification is for single family homes only. The comment states "includes spaces with a minimum of 7' clear head height. Spaces less than 7' are crawl spaces per RCO", (Residential Code of Ohio) section 305. The RCO reference intended this for one-, two-, and three-family Dwellings only, as they are the only ones in the jurisdiction of the RCO.

- **Finished basement storage**. Per IRS Section 42, all space must be defined as eligible basis or non-eligible basis. Any eligible basis area must be either support (mechanical/ maintenance space) or if it is tenant storage, then it is part of tenant storage aka net rentable.

How is Gross Square Footage defined?

Square footage calculations are defined in the Design and Architectural Standards which states, "All multifamily developments must use Building Owner Management Association (BOMA) Multifamily Standards using the "gross method". Single-family developments must use BOMA "Gross Area Measurement Standards". All square footages must be calculated and certified in the AHFA/GFA by the Architect of Record. All buildings within the property boundary must be included in the gross area including all buildings with HUD BIN numbers, free standing community buildings, maintenance buildings and sheds, picnic shelters, garages, carports, porches, etc. The calculation does include commercial, market rate, manager unit, Common Space, Dedicated Program Space, and tenant storage. The calculation does not include trash enclosures, concrete patios without roofs, and sidewalks.

How does OHFA classify space that is outside the residential living area and used for programming by both residents and non-residents?

It is either common area or community space.