

State: OHIO (QAP 2014)	Ohio Housing Finance Agency (OHFA)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	No.
A2. Scoring that discourages racial and economic concentration.	<p>✖ 5 points for projects meeting <u>one</u> of the following location-based characteristics [or any of the location-based characteristics listed in A4a or A8]: C) developments located in a primary market area where no development has taken place using OHFA housing tax credits in the last 15 years (p. 29). [applies to new units only]</p> <p>≈ 10 points for projects meeting one of the following preservation-based characteristics¹: A) family developments located in a non-QCT; B) developments that account for at least 30% of the total available affordable housing units in the PMA (p. 35). [Only applies to existing units.]</p>
A3. Mandatory requirements for development in high-opportunity areas	No.
A4a. Scoring that encourages development in high-income areas.	<p>✖ 5 points for projects meeting one of the following location-based characteristics [or any of the location-based characteristics listed in A2 or A8]: A) developments located within a high-income census tract. The median household income for each census tract will be divided by the median household income for the county in which it is located, resulting in an income ratio for the census tract, B) Family developments located in a non-QCT (p. 29). [new units only]</p>
A4b. Scoring that encourages development in high opportunity areas.	<p>≈ Up to 10 points to projects that are near land uses that are positive for the residents² (p. 32-33): [new and PSH units only]</p> <p>Urban: 10 pts to projects within a ¼ mile walk of at least 3 land uses or ½ mile walk of 6 land uses; 9 pts to projects</p>

¹ Additional qualifying **preservation characteristics** (that do not fit any of the above measures) include: C) developments in which a troubled asset will be acquired by an applicant who will serve as the owner/manager for the entire period of compliance; D) developments that have been maintained through good management but contain major components that are past their effective useful life; E) developments that will utilize HUD's Rental Assistance Demonstration program; F) developments which involve the conversion of obsolete unit configurations; G) developments which have a significant risk for market conversion; H) developments that contain a significant and urgent need for rehabilitation (p. 35).

² Positive land uses include retail (supermarket with produce, farmers market, clothing store, department store, pharmacy), services (bank, gym, hair care, laundry/dry cleaner, restaurant), and community facilities (licensed adult/senior care, licensed child care, community/recreation center, educational facility, entertainment venue, government office serving public on-site, place of worship, medical clinic, police/fire station, post office, public library, social services center (p. 32)

	<p>within a ¼ mile walk of at least 2 land uses or ½ mile walk of 4 land uses; 6 pts to projects within a ¼ mile walk of at least 1 land uses or ½ mile walk of 3 land uses.</p> <p>Suburban: 10 pts to projects within a ½ mile walk of at least 4 land uses or 1 mile walk of 7 land uses; 9 pts to projects within a ½ mile walk of at least 3 land uses or 1 mile walk of 6 land uses; 6 pts to projects within a ½ mile walk of at least 2 land uses or 1 mile walk of 5 land uses.</p> <p>Rural: 10 pts to projects within 2 miles of at least 3 land uses; 9 pts to projects within 2 miles of at least 2 land uses; 6 pts to projects within 2 miles of at least 1 land uses.</p> <p>≈ 5 points to a max of one project that will provide workforce housing in conjunction with economic and employment growth in the proposed development's Primary Market Area (p. 34). [applies to new units only]</p>
A5. Scoring or requirements that preference siting near high-quality schools.	No.
A6. Scoring that discourages development in distressed neighborhoods. ³	<p>≈ (-) 10 points for projects that meet one of the following development characteristics⁴ [or any of the development characteristics listed in A8, O2 or O3]: A) developments in which 100% include the redevelopment of completely vacant or foreclosed building; E) developments that include one of the following significant State or Federal Resources: HUD Choice Neighborhoods [could also fall under A8 though], HUD Rental Assistance Demonstration program, or Metropolitan Housing Authority capital funds (p. 30). [applies to new units only]</p> <p>≈ 10 points to projects that do not have detrimental land use adjacent to the site of the proposed development. Detrimental land uses will be those deemed at OHFA's sole discretion based on nuisance or otherwise adverse conditions such as high levels of noise, noxious odors, or incompatible uses (p. 33).</p> <p>≈ (-) Up to 10 points will be awarded to <u>existing</u> unit projects that preserve existing rental subsidies or prior housing tax credit deals. Developments with Project Based Section 8 for at least 100% of the units or USDA rental subsidy for at least 60% of the units. Fewer points given to projects with a lesser percentage of PBRA units p. 36). [While this is subsidy layering and could incentive development in distressed areas, it could also be a positive for G1.]</p>

³ Evidence of the inverse: preference for development in distressed neighborhoods (by overemphasizing QCT/DDA preference, preference for existing subsidized housing in distressed neighborhoods, preferences for low-income matched financing, etc.) should also be noted.

⁴ Additional qualifying **development characteristics** (that do not fit any of the above measures) include C) developments that utilize the federal historic tax credit as permanent financing; D(a)) developments that include State Historic Tax Credits or USDA Section 538 as permanent financing; F) local government funding or grants from a private organization unrelated to the development team, for example the Federal Home Loan Bank Affordable Housing program; H) Senior developments that are built on an existing senior campus and include access to services and/or healthcare options, as well as other housing options aside from the proposed housing tax credit development (p. 30).

A7. Scoring or requirements that preference siting near mass transit.	No.
A8. Focus on and operationalization of a neighborhood revitalization plan.	<p>≈ 5 points for projects meeting one of the following location-based characteristics [or any of the location-based characteristics listed in A2 or A4a]: D) developments located in one of the 32 Appalachian counties as designated in the Appalachian Regional Development Act of 1965. The development must also be in a rural area as defined in the allocation pools; E) developments located in areas that are also part of a revitalization plan. The municipal planning department must submit a letter that details the specific development, how it will further revitalization, and other current and future investments in the area; F) developments that will be a subsequent phase of a successful housing tax credit development. The existing phase(s) of the development must be adjacent to the new phase and have maintained at least an average 96% occupancy over the last two years [though this could potentially concentrate projects and potentially work as a negative in A6]; G) developments located within a one-half mile radius of significant economic investment of at least \$10,000,000 that will be completed between 2012-2016. Investments may include retail, new infrastructure, or other real estate development (p. 29). [applies to new units only]</p> <p>≈ See home-ownership clause that requires that projects be in a revitalization area [O3] (p. 30).</p> <p>≈ 10 points for projects that meet one of the following development characteristics [or any of the development characteristics listed in A6, O2 or O3]: G) local economic development in the form of a multi-phased Planned Unit Development (PUD) or local economic development strategy. The proposed housing tax credit development must not be the first phase of the PUD strategy. Applicants seeking points under this criterion must submit a letter from the municipality describing prior phases of the local PUD/economic development strategy, the amount of investment to date, and how the proposed development fits into the strategy. The other components of the development strategy cannot be comprised solely of affordable housing (p. 30). [applies to new units only]</p> <p>≈ 5 points for exceptional development initiative to one project that is a part of large-scale economic development efforts. Developments seeking these points must: submit a narrative describing the large scale economic development effort, the target area, planned investments in the target area, and a timeline for development; the proposed housing tax credit development cannot be the first component of the development effort; the proposed economic development must receive points under Local Priority; the proposed economic development must include housing for a mix of incomes, including market rate housing; the proposed</p>

	<p>economic development must include an element of non-housing development; OHFA will evaluate the proximity of the proposed housing tax credit development to the other development activities referenced in the narrative (p. 34). [applies to new units only]</p>
<p>B1. Local participation in site selection is limited to statutory minimum.⁵</p>	<p>[The only threshold requirement for local public notification is consistent with statutory requirements] (p. 19). [Threshold] Applicants must evidence that any outreach efforts required have taken place. This includes the entire community outreach plan for existing unit developments as well as the additional local government and general public outreach required for those developments that previously applied in 2013 (p. 21) [however does not indicate a requirement for community support.].</p> <p>⚖ 10 points to projects that comprise a comprehensive outreach strategy that includes opportunities for input and collaboration; 7 points to projects that effectively communicate the housing proposal (p. 26). [Neither of these require community support.]</p> <p>⚖ (-) 10 points to projects with a letter or resolution from a mayor, a majority of township trustees, a majority of City or Village Council, or a majority of county commissioners indicating that a majority of support exists (p. 27).</p> <p>⚖ (-) 5 points to projects that receive a priority designation (i.e., identified by the mayor, city manager, etc. as a priority development) (p. 27-8).</p>
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
<p>C1. Mandatory requirements ensuring affirmative marketing.</p>	<p>⚖ [Threshold] An Affirmative Fair Housing Marketing Plan is required for all properties. The applicant must complete an Affirmative Fair Housing Marketing Plan if no other plan is in place, including the outreach, marketing, and advertising methods used in order to affirmatively market the development. A separate plan is required for each census tract in which the development is located (p. 21).</p>
<p>C2. Scoring that incentivizes affirmative marketing.</p>	<p>No.</p>
<p>C3. Scoring that incentives language access and marketing to non-English speakers.</p>	<p>No.</p>
<p>D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.</p>	<p>No.</p>
<p>D2. Requirements for monitoring Section 8 voucher access <i>in high-opportunity areas</i>.</p>	<p>⚖ As part of annual compliance monitoring, the owner must show that they have not refused to lease a unit in the project to a Section 8 applicant because the applicant holds a Section 8 voucher or certificate (p. 54).</p>
<p>F1. Incentives for larger family units.</p>	<p>No.</p>
<p>F2. Incentives targeting</p>	<p>No.</p>

⁵ Evidence of the inverse: preferences or requirements for local participation should also be noted.

families/families with children	
G1. Scoring that promotes units for lowest-income households (<i>outside high-poverty areas</i>).	<p>≈ 5 points to projects that set-aside extremely low-income units (either 1) $\geq 10\%$ of units will be occupied by HHs $\leq 30\%$ AMI for proposals in Participating Jurisdiction areas; or 2) $\geq 5\%$ of units will be occupied by HHs $\leq 30\%$ AMI for proposals in non-Participating Jurisdiction areas (p. 28).</p> <p>See A6.</p>
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	<p>≈ The owner of a housing tax credit project must keep records for each qualified low-income building in the project for each year of the compliance and extended use period that includes demographic information (p. 52-3).</p>

OVERALL ASSESSMENT

TOTAL POINTS POSSIBLE: New Units: 125; Existing Units: 110; PSH: 115. (Scoring systems is such that points can only be gained.)

- *Location Based Characteristics highlight several avenues for development in high-income and/or high-opportunity areas.*
- *Conversely, some of the development characteristics largely work in the opposite direction as located-based characteristics and are also worth more points than location-based characteristics (10 as opposed to 5).*
- *This does seem to be a strong QAP based for site and neighborhood standards and includes multiple provisions related to community revitalization [A8]. However, many of the strongest provisions are for new – not existing – units.*

Notes:

OHFA housing goals:

- Support the development of four types of housing: 1) apartments for families; 2) apartments for seniors; 3) single family lease-purchase (rental units for the first 15 years); 4) and single-family homeownership.
- **Allocate housing tax credits and other funding sources to achieve a balanced distribution of resources based on geography, population served, and historic investment.** OHFA will use its sole discretion to determine if it needs to override the balance to serve areas of greatest need when necessary [A1].
- **Allocate housing tax credits and other funding sources to preserve existing affordable housing that is in need of rehabilitation and has Section 8 or equivalent federal rental assistance contracts. [(-) A6].**
- Support Permanent Supportive Housing (PSH) as stand-alone developments or typical multifamily or senior developments that include a percentage of PSH units.
- Support proposals that demonstrate collaboration with local units of government.
- **Supports the re-development of vacant properties in areas of the state most impacted by the foreclosure crisis. [(-) A6].**
- **Support the development of affordable housing in all areas of need including areas within a Qualified Census Tract and Difficult Development Areas [(-) A6].**
- **Support development in new markets where no previous product development has taken place [A3].**
- Support developments that are partially funded by Historic Preservation Tax Credit programs.
- **Support proposals that leverage substantial federal, state, local or Public Housing Authority or other development subsidies, such as the USDA Rural Development Section 515 program, HUD Choice Neighborhoods program and the HUD Section 811 program [(-) A6].**

- **Support the development of developments that will serve very low- and extremely low-income populations and/or provide rental subsidy for the residents [G1].**

Basis boost categories (130%) (in addition to projects located in QCTs): 1) New Unit developments that receive 5 points in the location based characteristics competitive criterion [potentially, **A2/A4a/A4b**]; 2) Existing Unit developments that receive 10 points in the Preservation Characteristic Priorities competitive criterion [(-) **A6**]; 3) PSH developments that receive 15 points for Highest Priority of Continuum of Care [**O2**] (p. 25).

OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	≈ All new construction units will incorporate minimum visitability standards (p. 40-1).
O2. Scoring that promotes units for special needs populations.	≈ 10 points for projects that meet one of the following development characteristics [or any of the development characteristics listed in A6, A8, or O3]: A) developments that include Ohio Department of Mental Health and Addiction Services capital funds (p. 30). [new units only]
O3. Scoring to promote home ownership.	≈ 10 points for projects that meet one of the following development characteristics [or any of the development characteristics listed in A6, A8, or O2]: B) developments in which 100% of the units will be lease-purchase and sold to qualifying residents at year 15. To be eligible, projects must be strategically located to promote neighborhood revitalization [see also A8] and applicant must demonstrate a viable purchase strategy for the end of the 15-year compliance period. The proposal must also be located in the new units urban pool (p.30). [new units only]
O4. Provisions affirmatively furthering fair housing laws.	<p>≈ All newly constructed units developed under OHFA guidelines shall be designed to comply with the Fair Housing Act (FHA) - even those units not covered by the Act (p. 42).</p> <p>≈ As part of annual compliance monitoring, owner must show that no finding of discrimination under the Fair Housing Act has occurred for the project (a finding of discrimination includes an adverse final decision by HUD, an adverse final decision by a substantially equivalent state or local fair housing agency, or an adverse judgment from a Federal court) (p. 54).</p>