

2019 Q&A Posting #4

April 10, 2019

QAP Core 7. D. - Disaster Rebuilding Set Aside

1. Core, Section 7.D Disaster Rebuilding Set Aside states "DCA may award 9% Credits to up to three (3) developments which will help communities respond to damage from the 2017 and/or 2018 hurricanes."

As \$37.9+ million in CBDG-DR funds is now being directed to communities impacted by 2017 storms, do communities impacted by 2018 Hurricane Michael (FEMA DR #4400) get preferential treatment under this "Disaster Rebuilding Set Aside"?

➤ **DCA Response:** All proposed properties must be located in one of the three priority zip codes designated in the CDBG-DR Implementation Plan: 31520, 31548 or 31705. Properties located within 0.5 miles of one of these zip code boundaries may submit an application. Preference will be given to applications located within the boundaries of each zip code.

QAP Threshold XXVII. - Integrated Supportive Housing

1. I'm needing clarification on the Application Folder in regards to 26. Integrated Supportive Housing which is listed as item number 27 in the QAP, Item number 26 in the QAP is Affirmatively Furthering Fair Housing which does not have a folder in the Application Folder. Folder item 27 is Deeper Targeting which is in the scoring section. Can you tell me where I am to file the items for these sections?

➤ **DCA Response:** The tab numbering only follows the QAP numbering up to a point. Not every QAP section requires documents at this stage of full application, so a corresponding tab is unnecessary in this Tabs Checklist. In this case, documents for "Affirmatively Furthering Fair Housing" are not submitted to DCA at initial application per the QAP, but rather after Selection. The Tab numbering continues with the next QAP section requiring documents at this stage, regardless of the number of that QAP section.

QAP Scoring III. - Desirable/Undesirable Activities

1. On the Desirable/Undesirable certification there's a dropdown to identify that photos are included for each desirable item/building. However, the QAP and instructions this year don't ask for photos of desirable buildings?

➤ **DCA Response:** DCA must be able to confirm the desirable activity/amenity exists. The 2019 QAP does not require a photo for desirable activities/amenities as evidence of the existence of a desirable that is already available for use to the public, however, in some cases, the only way for an applicant to do so would be to provide a photo of the construction being underway if the structure is "above ground".

QAP Scoring V. - Enriched Property Services

1. The 2018 QAP stipulated an “MOU or letter of intent with a service provider” as minimum documentation, while the 2019 QAP stipulates “Applicant must sign and submit an MOU.” Does the minimum documentation have to be a formal MOU, and a letter of intent will not be acceptable?

➤ **DCA Response:** While DCA does not formally define the term "MOU" within the 2019 QAP, the QAP does enumerate its required contents in Scoring Section V. DCA will consider any document meeting the enumerated criteria as sufficient for scoring purposes.

QAP Scoring VII. - Revitalization/Redevelopment Plans

1. There is a scoring category in the housing tax credit application for property that is located in a qualified census tract and a redevelopment area. However, there is a stipulation that the redevelopment plan must be approved within the past 5 years. Does a plan that was updated in 2009 qualify for points?

➤ **DCA Response:** No. The 2019 QAP requires that the Community Revitalization Plan (CRP) be approved by the Local Government within five (5) years of Applicant Submission. Please refer to the updated Guidance, published online 4/8/19.
2. Scoring section VII Revitalization / Redevelopments Plans, B. Third-Party Capital Investment states "resulting investment must...serve the tenant base for the proposed development". This section further states examples include but are not limited to "...development of community assets (e.g. parks, trails, community center)" If tenancy is HFOP, and 20% of the tenancy could be general population, would renovation costs of an elementary school be a "development of community asset" and count as an appropriate off-site capital improvement?

➤ **DCA Response:** No. Though the QAP does not formally define "community assets," the listed examples are open to all members of the community. Not all members of a community are able to access a school. Therefore, a school is ineligible.

QAP Scoring IX. - Stable Communities

1. In regards to Opportunity360, on 2-12-2019, the State Percentiles differ from what they do on 3-5-2019. This is the difference between scoring one and two points in the Opportunity 360 section which is significant. Can you provide clarity on this issue?

➤ **DCA Response:** Though the QAP requires a PDF copy of the Opportunity360 Measurement Report and provides instructions for how to download this report, it does not include a date by which this report must be downloaded. DCA will review equally all reports downloaded by the Application Submission date.

2. Part IX Scoring: Stable Communities Section B #3 Cell O283 Does not provide option for “Moderate” income which is common in rural areas.

➤ **DCA Response:** While Stable Communities incentivizes development in low-poverty areas, it only incentivizes developments in census tracts designated to be Middle or Upper Income level, not Moderate.

QAP Scoring XI. - Phased Development/Previous Projects

1. Can you no longer claim the 3-points for Previous Projects if you are 1 mile from a major transit hub (the previous exemption)?

➤ **DCA Response:** The 2019 QAP does not include exemptions enumerated in previous QAPs. Properties, regardless of their proximity to a transit hub, must follow the 2019 QAP guidelines.