



2021 9% and 4% Housing Tax Credit Competitive Rounds Questions and Answers

Published February 18, 2021.

Updated May 14, 2021.

The pages that follow are DCA responses to questions pertaining to Competitive Rounds for both 9% and 4% Housing Tax Credits.

Part I: Overview

Submitting Additional Questions

Questions must be submitted through the online 9% and 4% Competitive Round Q&A Survey hosted on the 2021 QAP and Related Documents webpage ([click here](#)).

- **Having issues using the online survey?** Please email hfdround@dca.ga.gov.
- **Concerned about the timing of DCA's response?**
 - First, given the volume of questions submitted, please expect at least a 2-week delay between submitting a question and seeing an answer posted to the website.
 - If you have concerns related to response timing, please email the inquiry to hfdround@dca.ga.gov
- **Have a project-specific question?** There is no separate option for “project-specific” questions. Currently, all questions go through the same approval and publication process.
- **Want to add context to a previously-submitted question?** DCA updates the Q&A postings based on what has been submitted through the online survey. To ensure your comment is considered, please do not email individual DCA staff. Instead, please submit your additional context through the online survey and reference the previously-submitted question.

Deadline to Submit Questions

The deadline to submit questions is Monday, April 26, 2021. This deadline is to ensure that all applicants have sufficient time to react to posted DCA responses before the May 21st application submission deadline.

After this deadline, DCA will only respond to questions pertaining to the mechanics of application submission (e.g., issues accessing the online application portal).

Q&A Document Update Process

DCA will update the Q&A document in small, incremental response sets. As this will increase the number of updates to the document relative to prior years, DCA will not send an email notification each time the Q&A document is updated.

Please monitor the “Updated” date by the Q&A document on the DCA website to track when DCA has released additional responses. By default, the table below will be sorted such that the most recent responses are at the top.

Navigating the Q&A Table

The below table, as posted to the DCA website, is sorted in descending order by date posted. If preferred, the document can also be sorted by category (in Microsoft Word, select the full table, select “Home” → “Sort”, under the Paragraph section).

In the window that pops up, select the following:

- The **Date Posted** column should be sorted by “Type: Date”
- The **Category** column should be sorted by “Type: Number”

Question categories are assigned a number for purposes of table sorting. Below are the category breakdowns in the Q&A table:

- 1-Core Plan
- 2-Threshold
- 3-Scoring
- 4-Compliance Appendix
- 5-Manuals
- 6-Emphasys Application Portal
- 7-Application Materials (Forms, etc.)
- 8-Other

Category numbers take the following form:

[Category number] . [subsection #]

For example, *Core Plan, Section 8. 9% Round Set Asides* is numbered as “1.08.”

Log of Changes in Updates to this Q&A Document

This section provides a high-level description of changes made to the document from one version to the next.

Update	Changes
2/18/21	<ul style="list-style-type: none">• Initial posting
2/26/21	<ul style="list-style-type: none">• Posted new Q&A set• Clarified in <i>Part I: Overview</i> that questions related to 4% Housing Tax Credits can also be submitted through this Q&A process and document, not just 9% questions.• Adjusted category numbers to resolve sorting issues.• Removed responses to Q0217_01 and Q0217_02 posted on 2/28/21. These provided preliminary guidance on QAP Workshop Slides and Pre-Application Instructions.<ul style="list-style-type: none">○ Click here to view the QAP Workshop Slides○ Click here to view Pre-Application instructions
3/2/21	<ul style="list-style-type: none">• Posted new Q&A set
3/3/21	<ul style="list-style-type: none">• Posted new Q&A set
3/4/21	<ul style="list-style-type: none">• Posted new Q&A set• Updated <i>Part I: Overview, Submitting Additional Questions</i> to clarify that inquiries or concerns related to the timing of DCA responses to specific questions should be emailed to hfdround@dca.ga.gov.
3/15/21	<ul style="list-style-type: none">• Posted new Q&A set
3/24/21	<ul style="list-style-type: none">• Posted new Q&A set
3/29/21	<ul style="list-style-type: none">• Posted new Q&A set
4/15/21	<ul style="list-style-type: none">• Added note to section <i>Part I: Overview, Submitting Additional Questions</i>: “Need to add context to a previously-submitted question?”

	<ul style="list-style-type: none"> • Posted new Q&A set.
4/23/21	<ul style="list-style-type: none"> • Posted new Q&A set.
5/6/21	<ul style="list-style-type: none"> • Posted new Q&A set.
5/7/21	<ul style="list-style-type: none"> • Posted new Q&A set.
5/12/21	<ul style="list-style-type: none"> • Posted new Q&A set.
5/14/21	<ul style="list-style-type: none"> • Posted new Q&A set.

Part II: Question and Answer Table

Date Posted	Category	Question and Answer
5/14/21	2.25 Occupied Developments / Relocation Manual	<p>Question: ASQ0507_01 From the instructions and the way cells are changing colors based on what I am inputting into the Relocation Workbook, I'm wondering if there are some errors. Please confirm whether the workbook is functioning as intended and, if applicable, please provide additional guidance for some of the cells.</p> <p>Answer: Any auto-populated color or number responses are for the benefit of DCA. As stated in the manual, the workbook is to have estimates. Complete the workbook to the best of your ability. If you feel that the workbook does not represent all of your relocation efforts, please include a supplemental table to describe the needed information that is not covered in the workbook.</p> <p>Below are a series of responses to individual questions to further clarify the Relocation Workbook.</p> <p>1. We believe that all the residents are right sized. Why does cell H30 on the Summary worksheet show in red? Right-sizing residents is not a requirement when no displacement is caused because of the current and proposed unit sizes. What C.2. is indicating is that, if you were to decide to put one person households in an efficiency unit then there would be more efficiency units needed.</p> <p>2. For Table B on the Summary worksheet, we have residents that are primarily below 30% AMI. No one over 50% AMI, all the units for tax credits will be split between 50% and 60% AMI and the residents can</p>

live in these units because their rents are supplemented with the HAP subsidy. It is OK that Table B has red in it showing that we need more 30% AMI units, when we really do not?

DCA's relocation specialists look at the whole picture. You can add a note as a reminder of the HAP contracts here:

B. AMI Designation by Housing Need	No	
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But also please note that under 4. Household Budget, there is no rental assistance indicated.

Amount of monthly rental assistance for replacement housing or upon return	5.13	\$ -
Did household choose to move to rent subsidized housing?	5.18	No

3. For Table C on the Summary worksheet, again there is red showing that the residents are over the proposed AMI%, but as established above all the residents are well below the 50% and 60% AMI.

That is an error in the workbook that DCA's Relocation Specialists will take note of (it should calculate "yes" instead of "no".)

4. For Table D on the Summary worksheet, rows 55 and 56 have current and proposed tenancy. They only give two options elderly or HFOP. I believe there should be an "Other" dropdown? Correct. We are neither and plan to stay neither. The building is 62+, but we have 10% of the units set aside for the mobility disabled who can be 18+. Should we just leave these blank?

Yes, with an explanation in the corresponding notes section.

5. Need explanation of column Z on the tenant data sheet. It appears that column Z shows that none of the households are over the proposed AMI, but then the chart on the Summary page, shows that everyone is. Please see response to #3.

6. Need an explanation of Column AA on the data sheet. WE do not think it applies. Want to confirm that we do not need to worry about it or is it what is throwing off the summary page. If you do not have HOME, HTF, or CDBG then this column does not apply.

7. For Table C on cell H22 on the Household budget sheet. The resident is in subsidized housing and will stay in subsidized housing should the answer be yes or no. We chose "no"

Since the household is returning to subsidized housing, the answer should be yes.

		<p>8. For tables D and for the Household budget sheet. They have calculations in them but we do not think that they apply. If they do we do not understand. Do we need to focus on these two tables and if so, please explain them. Please see the instructions at the top of each sheet: “Fill out the white cells (grey cells auto-populate).” Grey cells either do not apply or are auto-populating and you do not need to do anything.</p> <p>9. We have a staff unit, it is staff member that lives in a non-revenue unit. The person provides services as needed after hours and on weekends. We are including the relocation for that one employee in the nonresident tab. Is that correct? We are treating them like the rest of the residents. This is sufficient.</p>
5/14/21	2.25 Occupied Developments / Relocation Manual	<p>Question: Q-ReloWebinar_02 For onsite relocation, are there guidelines outlining our responsibility when a resident refuses to move out of their unit? Can they be 'evicted' for not relocating?</p> <p>Answer: This situation will default to Georgia’s Landlord Tenant law when a resident refuses to move out of a unit. DCA has released a Landlord Tenant handbook which could be a guideline.</p>
5/14/21	2.25 Occupied Developments / Relocation Manual	<p><i>This Q&A was originally posted on 5/12/21. Below is a revised DCA response.</i></p> <p>Question: Q0426_07 We are proposing a 9% LIHTC new construction, 72-unit family development that includes 32 RAD Section 8 PBRA-assisted units on raw land that does not contain any public housing units on it. Through the RAD program, we will utilize a Transfer of Assistance process in the RAD program to transfer the PBRA assistance from the local housing authority's current portfolio of existing public housing units to the new LIHTC/RAD project site. We will have a delayed HAP Contract that will begin on the new site upon completion of construction. At that time, 32 families residing in the housing authority's public housing will be selected to relocate to the new LIHTC/RAD project site through a lottery system overseen by housing authority that will be based on family-size and lease compliance. If we are successful in securing 9% LIHTCs in this 2021 Round, we estimate to complete construction and move residents into the new project during 4th Quarter 2023.</p> <p>Given that the 32 RAD families will not be relocated until over 2 years from now, we do not think it is wise, effective, and appropriate to select these households now because we have no assurance that they will be qualified and still living in public housing by then. Therefore, we believe providing resident-specific information on relocation documents as part of our 9% LIHTC application is not a wise</p>

approach. We believe the following documents are appropriate to submit in the 9% LIHTC application and we plan to submit the following documents

- Comprehensive Relocation Plan
- Site Relocation Survey Form
- Relocation Budget
- Multifamily Tenant Relocation Plan Certification
- Biography or letter for Advisory Services and
- DCA Resident Engagement for Occupied Rehab Form (if DCA requires for this type of relocation)

However, we believe it is appropriate to postpone submitting resident-specific relocation documents to DCA until we have determined the specific households once the project is near completion. Based on this reality, would DCA be agreeable to this project submitting the following relocation documents within 30 days of completion of construction in 2023?

The specific documents that we propose to be submitted following resident selection in 2023 are as follows:

- Relocation Displacement Spreadsheet/Workbook
- Rent Rolls
- Tenant Household Data Forms and
- General Info Notice for Occupants

DCA has previously approved this for similar projects. Can you please confirm that this will be acceptable for 2021?

Also, will DCA require this new construction project to submit the DCA Resident Engagement for Occupied Rehab form?"

Answer:

*DCA's original response, posted 5/12/21, was based upon the Relocation Manual guidance and detailed certain required steps associated with one component of the development. Upon re-review, DCA has determined that there is insufficient information in the question submitted to confirm whether the full application circumstances constitute a situation under which **Threshold, Occupied Development** applies and therefore the extent to which the 2021 Relocation Manual applies.*

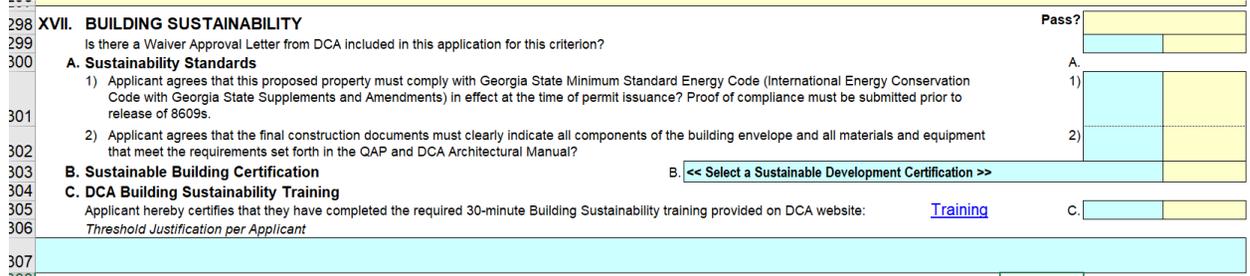
If the LIHTC development site is occupied by residents or non-residential tenants as defined in the 2021 DCA Relocation Manual, then the Occupied Development Section of the 2021 QAP applies.

		<p>If the LIHTC development site is not occupied by residents or non-residential tenants as defined in the 2021 DCA Relocation Manual, then the Occupied Development Section of the 2021 QAP does not apply.</p>
5/14/21	3.14 Scoring; Previous Projects	<p>Question: ASQ0505_01 It seems the Core Tab Checklist is missing information in the "Previous Projects" section as there is no option to clarify we are providing the screenshot of the DCA interactive map. Will this be corrected?</p> <p>Answer: The Previous Projects sections of the Core Tab Checklist matches the Minimum Documentation for the Previous Projects section in the QAP. Documents can be placed in the application folder 35)PrevProjects</p>
5/12/21	2.01 Threshold; Project Feasibility	<p>Question: Q0426_06 Our proposed 9% LIHTC new construction, 70-unit family development includes 30 HUD RAD Section 8 PBRA-assisted units and the balance of 40 units will be LIHTC-only with no rental assistance. We would like clarification from DCA of what source for our Utility Allowances (UAs) we should use. By the QAP definitions of the Threshold Criteria, we are considered to have both ""HUD-Regulated Buildings"" and ""Tax Credit Buildings with no HOME."" HUD will review the rents and utility allowances for the 30 RAD Section 8 units, but not the 40 LIHTC-only units. We understand that DCA requires the RAD units to utilize the HUD-Prescribed UAs for those units, which will be documented with a RAD CHAP in the LIHTC application. However, we ask for clarity from DCA about which UAs we should use for the LIHTC-only units. The local housing authority does not administer Section 8 units. Which source should we use to establish the initial UAs for the LIHTC-only units? Should the whole project comply with the ""HUD-Regulated Buildings"" definition and therefore use the CHAP UAs for all units?</p> <p>Answer: <i>Threshold Criteria, Project Feasibility, Feasibility Assumptions and Policies, 7. Operating Utility Allowance</i> describes the utility allowance assumptions to be used for underwriting purposes under the most common circumstances submitted to DCA. For all circumstances not described explicitly under this subsection, DCA does not hold a position different from what is allowable under the applicable regulations given the property's funding sources.</p> <p>For applicants who wish to utilize the UA established by the Public Housing Agency (PHA) that administers the Section 8 Program in the locality where the property is located, and DCA is the contract administrator, please see the applicable UAs here https://www.dca.ga.gov/node/4593.</p>

5/12/21	2.25 Occupied Developments / Relocation Manual	<p>Question: Q-ReloWebinar_03 Will the new manual be in effect for projects funded in 2020?</p> <p>Answer: The new manual coincides with the 2021 QAP and is required for 2021 applications. It can be used as guidance for earlier years.</p>
5/12/21	2.25 Occupied Developments / Relocation Manual	<p>Question: Q-ReloWebinar_01 Does the new relocation manual apply to existing projects in DCA's LIHTC portfolio that are being refinanced without new tax credits?</p> <p>Answer: This only applies to developments applying for DCA's Housing Tax Credits funded in 2021.</p>
5/12/21	2.25 Occupied Developments / Relocation Manual	<p>Question: Q0413_02 The DCA application checklist requires a site relocation form for ALL developments (even those not requiring relocation). Can the DCA staff please point us to the exact form that is required? There are numerous forms within the relocation folder on the DCA website and we do not want to use one the incorrect form.</p> <p>Answer: All proposed developments with occupants on-site since the earlier of pre-application, three months prior to Application Submission, and application for federal funds (if applicable) must meet the requirements of both part A and B under Threshold, Occupied Developments.</p> <p>Developments with no occupants on site are not required to submit any minimum documents for this section. However, thorough completion of the Core Application, Part I under Occupied Developments (Threshold tab) and Additional Project Information (Project Information tab) is important to help the Applicant consider various relocation anomalies.</p>
5/12/21	2.25 Occupied Developments / Relocation Manual	<p>Question: Q0421_01 We have a site on which several homeless people appear to be living. There are no structures on the site. Since these people are not tenants of the landowner, does DCA consider this an occupied development and subject to the Uniform Relocation Act requirements?</p>

		<p>Answer: DCA supports the health and wellness of both the housed and unhoused. DCA does not consider this an occupied development. However, enlisting the support and services of your region’s Coordinated Entry Program can help minimize the impact of displacement and demonstrates effective development design. Therefore, please provide a plan under “Applicant’s Comments and Clarifications” in Part I of DCA’s Core Application to explain your process to support the unhoused individuals currently in your development.</p> <p>If you are unable to identify homeless resources for your area, please contact the Balance of State's Toll Free Hotline at 1-844-249-8367, or email us HomelessInfo@dca.ga.gov.</p>
5/7/21	1.15 Core; Submission Requirements and Award Limitations	<p>Question: Q0426_01 With recent increases in material costs (lumber, steel, etc.), will DCA consider increasing the 2021 award limitations or set aside additional credits for 2021 competitive awards facing a funding gap?</p> <p>Answer: Regarding an additional set aside of credits: the amount of 9% Credits for the Competitive Round specified in the QAP (<i>Core Plan, Available Resources, A. 9% Federal Credit</i>) is an estimate of what will be available and not a number that DCA can adjust based on discretion.</p> <p>Regarding project limitations: DCA will not be increasing the project award limitations specified in <i>Core Plan, Submission Requirements and Award Limitations, 9% Round Award Limitations, Project Limitations</i>.</p>
5/7/21	2.01 Threshold; Project Feasibility	<p>Question: Q0426_08 The QAP states that "original executed preliminary commitments" are required for all financing. I'd like to confirm if scanned color copies of original signatures or electronic signatures are acceptable or if Applicants need to provide original executed copies of all preliminary financing commitments as the QAP states? Are Applicants required to also sign the executed commitments at the time of application or must they only be executed by the financing provider?</p> <p>Answer: Electronic or wet signature is acceptable. All signatory lines on the commitment should be signed, whether the lender only or lender, borrower, etc. such that the commitment is considered fully executed. Scanned copies of these original documents are acceptable.</p>

5/7/21	2.02 Threshold; Cost Limits	<p>Question: Q0426_02 The HUD 2020 Unit Total Development Cost Limits are low considering the recent increases in material costs (lumber, steel, etc.). Will DCA consider increasing the DCA increase percentages from the 1.10, 1.15 and 1.20 percentages in the 2021 DCA cost limit testing form?</p> <p>Answer: DCA will not be increasing these percentages at this time.</p>
5/7/21	2.06 Threshold; Appraisals	<p>Question: Q0426_05 For our proposed project, the Applicant will enter into an Option for a Ground Lease at a nominal value with the local housing authority, which owns the land and will also serve as one of the General Partners and developers in the project. Although there is an identity-of-interest, the ground lease will be conveyed at a nominal value, so in previous years DCA has not required an appraisal to justify the land value. Could DCA please confirm that this still holds true for 2021?</p> <p>Answer: An appraisal is required if any of the below applies, unless a waiver was obtained.</p> <p>The QAP states:</p> <p>Threshold, Appraisals, Applicant-Commissioned Appraisals: “DCA policy requires that the Applicant obtain an appraisal of the value of a property if there is an Identity of Interest between the buyer and the seller. This includes a seller that is a member of the proposed Project Team, including a limited partner. This appraisal must be submitted with the Application and follow the value estimates detailed in the 2021 Appraisal Manual. DCA will carefully scrutinize the sales price of land between related parties to ensure that the value has not been inflated. While the appraisal will be an indication of fair market value, DCA will consider tax values as well as the lesser of the appraised value or actual sales price established as indicative of the value of a property.”</p>
5/7/21	2.07 Threshold; Environmental Requirements	<p>Question: Q0420_03 If we have client that would like to go into the Brownfield program, is the Brownfield application due along with the environmental application due to you on May 21?</p>

		<p>Answer: The QAP does not state any requirements directly pertaining to brownfields, and thus the brownfield application is not due along with the 9% Credit Application on May 21. However, submission may be required as a condition of funding.</p>
<p>5/7/21</p>	<p>2.17 Threshold; Building Sustainability</p>	<p>Question: Q0426_09 QAP - Appendix I: Threshold Building Sustainability</p> <p>The QAP states that Applicants must complete DCA's virtual Sustainability training. One of the QAP workshop slides gives the web address to a youtube video of a prior webinar. Will DCA be providing a webinar this year or are applicants simply required to watch the youtube video? Is there any sort of documentation needed for the application to meet this requirement?</p> <p>Answer: DCA's Building Sustainability Training is located here: https://www.youtube.com/watch?v=VozXGGf8Ueg&t=503s</p> <p>Please note, the YouTube video will not generate a Certificate of Participation. Applicants can demonstrate watching the webinar with a self-certify box in the Threshold Tab of the Excel Core App.</p> <p>The following is in the core app, with a link to the training as well.</p>  <p>298 XVII. BUILDING SUSTAINABILITY Pass? <input type="checkbox"/></p> <p>299 Is there a Waiver Approval Letter from DCA included in this application for this criterion? <input type="checkbox"/></p> <p>300 A. Sustainability Standards A. <input type="checkbox"/></p> <p>301 1) Applicant agrees that this proposed property must comply with Georgia State Minimum Standard Energy Code (International Energy Conservation Code with Georgia State Supplements and Amendments) in effect at the time of permit issuance? Proof of compliance must be submitted prior to release of 8609s. 1) <input type="checkbox"/></p> <p>302 2) Applicant agrees that the final construction documents must clearly indicate all components of the building envelope and all materials and equipment that meet the requirements set forth in the QAP and DCA Architectural Manual? 2) <input type="checkbox"/></p> <p>303 B. Sustainable Building Certification B. << Select a Sustainable Development Certification >> <input type="checkbox"/></p> <p>304 C. DCA Building Sustainability Training C. <input type="checkbox"/></p> <p>305 Applicant hereby certifies that they have completed the required 30-minute Building Sustainability training provided on DCA website: Training</p> <p>306 <i>Threshold Justification per Applicant</i></p> <p>307</p>
<p>5/7/21</p>	<p>3.04 Scoring; Deeper Targeting</p>	<p>Question: Q0426_03 For scoring section IV. Deeper Targeting, is it allowable to submit the application claiming points for either IV(A) Deeper Targeting Through Rent Restrictions (2 pts) or IV(B) Deeper Targeting Through</p>

		<p>New PBRA Contracts (3 pts), knowing that only one of the two sub-sections may be awarded? The concept would be to claim 3 points for New PBRA Contracts, but to also structure the application to meet the criteria for A. Rent Restrictions as a contingency in the event DCA does not approve our claim for B. New PBRA Contracts. Are we allowed to submit for both, with the idea that DCA would award the higher of the two determined, or is it an all or nothing type scenario for this section?</p> <p>Answer: Under this section, the QAP states the following: “Applicants may claim points under either A or B.” Applicants must pick one of the two subsections for points, not both.</p>
5/7/21	3.05 Scoring; Desirable/Undesirable Activities	<p>Question: Q0426_11 Can Bing Maps be used versus Google Maps for the driving or walking route? Also, can a city/public dirt road be used as a route? It is a public graded road. It is located in a more rural community.</p> <p>Answer: The QAP does not specify that certain types of public-access roads are ineligible. Regarding Bing Maps versus Google Maps documentation, please note that the QAP states:</p> <p style="text-align: center;">Scoring, Documentation and Justifications, Minimum Documentation: “In the event the Applicant submits an alternate document to a minimum document, a thorough explanation of the usefulness of this alternate document should be entered into the appropriate scoring justification section.”</p>
5/7/21	3.07 Scoring; Quality Education Areas	<p>Question: Q0426_14 Since Quality Education Areas has its own scoring category this year, an application can score points for performing schools and still claim points in Revitalization/Redevelopment as well correct? Last year we could not claim points for schools if you were claiming points for Revitalization.</p> <p>Answer: Correct, Applicants may claim points in Quality Education Areas regardless of points claimed in any other sections.</p>
5/7/21	3.09 Scoring; Community Transformation	<p>Question: Q0426_04 The QAP states that an Applicant is only eligible to claim points in this section if it meets the following criteria: "Each Project Team may submit only one Application for Community Transformation."</p>

		<p>If Developer A is part of two separate and distinct Project Team Application submissions, are both Projects eligible to receive points under this section?</p> <p>Answer: "Project Team" is defined in the 2021 QAP as "the General Partner, Developer, Consultant and Principal(s) thereof for a proposed tax credit project." If the General Partner, Developer, Consultant, or Principal(s) thereof for one Application differ from another Application, these Applications have different Project Teams and each are eligible to submit an Application claiming Community Transformation points.</p>												
<p>5/7/21</p>	<p>3.14 Scoring; Previous Projects</p>	<p>Question: Q0426_12 For Previous Projects under the Four to Six Years Lookback Period: I always have to clarify this for me every year. Specifically for the Two Points category, the proposed development's site is not within a buffer that has received an award in the last 4 funding cycles. We do not count the current application round of 2021 so the last 4 cycles are 2020, 2019, 2018, and 2017 correct? So in order to score 2 points in this category any previous award in that buffer would have to be in the 2016 round or earlier? And for the 3 points it would have to be the 2014 round or earlier? Is that correct?</p> <p>Answer: This interpretation is correct.</p> <table border="1" data-bbox="835 894 1745 1252"> <thead> <tr> <th>Where the subsection says...</th> <th>To be eligible, any previous award within the buffer must have been under the...</th> </tr> </thead> <tbody> <tr> <td>"Last 15 DCA rounds"</td> <td>2005 Round or prior</td> </tr> <tr> <td>"Last 6 DCA rounds"</td> <td>2014 Round or prior</td> </tr> <tr> <td>"Last 4 DCA rounds"</td> <td>2016 Round or prior</td> </tr> <tr> <td>"Last 3 DCA rounds"</td> <td>2017 Round or prior</td> </tr> <tr> <td>"Last 2 DCA rounds"</td> <td>2018 Round or prior</td> </tr> </tbody> </table>	Where the subsection says...	To be eligible, any previous award within the buffer must have been under the...	"Last 15 DCA rounds"	2005 Round or prior	"Last 6 DCA rounds"	2014 Round or prior	"Last 4 DCA rounds"	2016 Round or prior	"Last 3 DCA rounds"	2017 Round or prior	"Last 2 DCA rounds"	2018 Round or prior
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"Last 3 DCA rounds"	2017 Round or prior													
"Last 2 DCA rounds"	2018 Round or prior													
<p>5/7/21</p>	<p>3.18</p>	<p>Question: Q0426_13</p>												

	Scoring; Favorable Financing	<p>Can a private individual who is totally unrelated to the development or any parties of the development provide a loan to the development and be allowable under the no. 11 "Other" category for Favorable Financing? Provided that the loan meets all Favorable Financing requirements.</p> <p>Answer: Category 11 under <i>Favorable Financing</i>, subsection <i>A. Qualifying Sources for Favorable Financing</i> states the following: "Other Federal, State, or local grant funds or loans."</p> <p>A private individual does not constitute a federal, state, or local entity.</p>
5/7/21	3.18 Scoring; Favorable Financing	<p>Question: Q0426_10 I remember hearing in one of the online listening sessions that owner financing of the land was allowable under favorable financing. It really doesn't appear to be allowable because the only way for it qualify is for the owner to loan a substantial amount over the sales price of the land. I have a seller of the land who is an unrelated party to the development willing to owner finance the sale of the land at or below AFR and meeting all of the other favorable financing requirements. The sales price is \$520000 so the financing would be \$520000. Units proposed in the development are 50. Under that scenario that loan would not qualify for favorable financing points because the sales price has to be subtracted from the loan which in this case would be \$0 allowable for consideration. Under this scenario the seller would have to loan the development \$500000 more than the sales price of the land or \$1020000 for the loan to qualify for points under favorable financing. Is that correct?</p> <p>Answer: Correct. As the QAP states: "If the seller of the land/property (or any related party) is providing funds to finance the development and claiming these points, the sales price will be reduced from the total funds provided, to calculate the favorable financing points allowable."</p>
5/7/21	7.00 Application Materials	<p>Question: Q0428_02 The Desirable Certification excel rounds the total score up. See cells X11 vs. X42.</p> <p>Answer: The Desirable Certification form that was available on the DCA website prior to April 28 has a formatting error. The form has since been replaced with an updated version in which the formatting error has been fixed. Applicants using the form posted prior to April 28 must use the score in cell X42 as their final score for Desirable Activities.</p>

<p>5/6/21</p>	<p>1.23 Core; DCA Pre-Application Fees and Deadline Schedules</p>	<p>Question: Q0420_01 The QAP Core Plan, Exhibit A (DCA Pre-Application Fees and Deadline Schedules) states the Qualification Determination (Required for all Deals) as \$1,000.</p> <p>Is the \$1,000 Qualification Application Fee still due with the full application May 21, 2021 if the project is grandfathered in for qualifications and exempt from submitting experience for the 2021 round?</p> <p>Answer: The QAP states:</p> <p style="text-align: center;">Threshold, Experience, Capacity, and Performance Requirements, Requirements for Experience (Certifying Entity): “A certifying entity that was deemed to meet experience requirements in 2020 is only exempt from submitting documentation of experience for the 2021 round. All other sections—both capacity and compliance—of the performance workbook must be completed. Only those certifying entities that have received a determination letter of ‘Qualified’ in the 2020 round will be deemed to qualify under grandfathering.”</p> <p>The Qualification Application Fee is due with the full application as the project team must still receive a qualification determination to satisfy the requirements of QAP Threshold Section XX.</p>
<p>5/6/21</p>	<p>2.01 Threshold; Project Feasibility</p>	<p>Question: Q0422_04 Regarding Project Feasibility and Market Units, can DCA clarify what is considered "unrestricted financing" in this regard? What attributes of a specific source would cause the financing to be restricted? Would a loan from a housing authority be considered restricted if the source of the loan is from HUD, for instance PHA capital funds, DDTF, RAD, etc.? Conversely, would a loan from a housing authority be considered restricted if the source of the loan is from operating cash or developer fees earned?"</p> <p>Answer: The QAP states:</p> <p style="text-align: center;">Threshold, Project Feasibility, Feasibility Assumptions and Policies, Market Units: “<i>Any and all costs directly associated with developing unrestricted units must be covered by unrestricted financing sources. The market rate units to total units percentage must be less than or equal to the unrestricted permanent financing to total development cost percentage. Deferred developer fee is considered an unrestricted financing source for purposes of this section.</i>”</p>

		Unrestricted financing means financing which does not have income or rent affordability requirements associated with it.
5/6/21	2.03 Threshold; Tenancy Characteristics	<p>Question: Q0422_03 If a Pre-application was submitted that reflects HFOP and Income Averaging, can the applicant then change the tenancy to Senior 62+ and not use Income Averaging in their CORE application submission?</p> <p>Answer: Yes. However, if waivers were obtained related to the proposed unit mix (relocation, underwriting, etc.), all waivers must be resubmitted based on the new proposed unit mix.</p>
5/6/21	2.09 Threshold; Site Access	<p>Question: Q0420_02 If we have the easement agreement with all required signatures would that be enough to satisfy DCA to submit that at application submission? Then have it recorded at closing if in fact it's funded. The reason is the entity names that we have put into place would not be the owners of either parcel if the easements are recorded before application submission. So it wouldn't make sense to record them before application submission.</p> <p>Answer: Proposed easements may be recorded at closing.</p>
5/6/21	2.25 Occupied Developments / Relocation Manual	<p>Question: Q-ReloWebinar_09 What happens if our Relocation Specialist leaves (no longer able to perform their duties) during the rehab?</p> <p>Answer: Hire a new specialist and be sure all the documentation is in order before the Specialist leaves the position. You will still be held accountable for what was and was not completed. With next DCA submission, submit the new resume.</p>
5/6/21	2.25	<p>Question: Q-ReloWebinar_08 Is there flexibility when the Dev Team has not yet acquired the property and the current owner does not allow full communication with residents?</p>

	Occupied Developments / Relocation Manual	<p>Answer: Yes, DCA will work with you. Ensure your contingency plan is thorough to cover all the possibilities. Refer to the General Policies section of the Relocation Manual.</p>
5/6/21	2.25 Occupied Developments / Relocation Manual	<p>Question: Q-ReloWebinar_07 If relocation costs are being funded outside of the project budget (i.e. no tax credits will be used), can we speak to the cost of relocation + contingency in our relocation plan, but exclude it from the sources / uses portion of the core application? Or, do we have to show the contingency + relo costs as a part of the project budget but note a separate / outside source?</p> <p>Answer: 1. Show the contingency and relocation costs as a part of the relocation budget and plan and note the separate / outside source. This clarifies the scenario for the DCA Relocation Specialist.</p> <p>2. Add note to Uses tab of Core Application stating why it is not included in the development budget and the alternative funding source for relocation. This describes the scenario for the DCA Underwriter.</p>
5/6/21	2.25 Occupied Developments / Relocation Manual	<p>Question: Q-ReloWebinar_06 We are able to transfer residents within our property for temporary relocation. In those cases, if a unit becomes available, we always offer it to our relocatees first. If the unit will be available sooner and they wish to move, we ask them to sign a document saying they waive their 30 days. Is that ok or do we need them to wait 60?</p> <p>Answer: Moving residents in advance of their scheduled move date is acceptable if the resident provides a Tenant Certification stating it was their choice to move. Submit the tenant certification in lieu of any following applicable Notice (60 and/or Notice of Moving Date).</p>
5/6/21	2.25 Occupied Developments / Relocation Manual	<p>Question: Q-ReloWebinar_05 Is the 60-day temp relocation notice in addition to the 30-day notice?</p> <p>Answer: The 30-day notice is the Notice of Moving Date. Two notices would need to be sent, unless the 60 Day Notice states the specific moving date for relocation.</p>

5/6/21	2.25 Occupied Developments / Relocation Manual	<p>Question: Q-ReloWebinar_04 Please further explain the 60-day temporary relocation notice.</p> <p>Answer: The notice is important to use because it keeps the tenants informed regarding the relocation process which can be taxing. This notifies residents of moving date and moving logistics for temporary relocation for fewer than 12 months. It must be distributed at least 60 days before moving. If a specific moving date is not provided, the notice must state that a Notice of Moving Date will be distributed no less than 30 days before the tenant must move.</p>
5/6/21	3.21 Scoring; Underserved Populations	<p>Question: Q0422_02 Criterion 1 in Underserved Populations appears to be a baseline requirement. Can you confirm that: A) The percentage of units in Exhibit II are referring to one-bedroom units as mentioned in the criterion; and B) The percentage only applies to affordable units, and any market units are not factored into the percentage calculation?</p> <p>Example: If a project has 100 units, but 10 are market rate, then the 20% requirement on a family deal would be applied to the 90 affordable units, meaning there must be 18 affordable one-bedroom units for this project to meet the criterion?</p> <p>Answer: The <i>Housing Assistance Competitive Ranking Form</i> (click here) indicates that Unit Mix is a baseline requirement and will not be used for competitive ranking of applicants for points in this section.</p> <p>The percentage of units stated in Exhibit B is based upon all “property units”, and therefore does not exclude market rate units:</p> <p style="text-align: center;">Exhibit B of Appendix II, DCA Housing Assistance Commitment and Eligibility: “...Applicant agrees to accept DCA PBRA for up to 10% of property units. Applications proposing a Family tenancy agree to contract up to 20% of units if possible given PBRA contracts on the property.”</p> <p>In the above example, the 20% would be applied to all 100 units in the proposed development.</p>
5/6/21	7.00	<p>Question: Q0422_01</p>

	<p>Application Materials; Application Tabs Checklist</p>	<p>In the 2021 Application Tabs Checklist, 11. XI Operating Utilities 01 states "Letter from Local Gov. official - includes project name, address, or parcel ID and confirms zoning. Dated w/in six (6) months of App Submission."</p> <p>We believe this is an error and should state the following: "Ltr from authorized authority that includes project name, address, or parcel ID and confirms utilities will be available - Dated within six (6) months of App Submission."</p> <p>Answer: The QAP states:</p> <p style="padding-left: 40px;">Threshold, Operating Utilities: "Minimum Documentation: Letter(s) from authorized utility authorities that includes project name, address, or parcel ID and confirms that utilities will be available. The letter(s) must be dated within 6 months of Application Submission."</p> <p>A letter from the appropriate utility authority satisfies the requirements of the QAP.</p> <p>There is a typo in the checklist. With any discrepancy, please follow the QAP.</p>
<p>5/6/21</p>	<p>8.00 Other</p>	<p>Question: Q0423_01</p> <p>1. Is the limited partnership entity (in which the General Partner would be the general partner) required to be formed or registered with the Georgia Secretary of State's Office at the time of application?</p> <p>2. It has become common practice among equity investors in LIHTC transactions that the general partner in a limited partnership be a single purpose entity. If the Certifying Entity for the General Partner is formed and registered with the Georgia Secretary of State's Office, is the General Partner entity required to be formed or registered with the Georgia Secretary of State's Office prior to application?</p> <p>Answer: The QAP does not require the limited partnership entity or the General Partner entity be formed or registered with the Georgia Secretary of State's Office at the time of application.</p>
<p>4/23/21</p>	<p>2.01 Threshold; Project Feasibility</p>	<p>Question: Q0331_03</p> <p>We noticed the efficiency dwelling type in the architectural standards manual, which appears to be somewhere in between a studio and a one bedroom. As it pertains to calculating the applicable maximum rent for this type of unit, are they considered to be studios (1 persons) or 1 bedrooms (1.5 persons)?</p>

		<p>Answer: The Architectural Manual Appendix I, Section V, Part C, sets forth Minimum Unit Sizes, and distinguishes between the different required square footage, as well as kitchen facilities, for Studio units and Efficiency units. However, neither Studio nor Efficiency units indicate any bedrooms.</p> <p>The QAP states:</p> <p style="text-align: center;">Threshold Criteria, Project Feasibility, A. Feasibility Assumptions and Policies, 6. Rent: <i>“Tax Credit (only). Gross rents may not exceed 30% of 60% of the effective AMI table for the appropriate bedroom size, unless an applicant is utilizing Income Averaging. Applicants must assume 1.5 persons per bedroom.”</i></p> <p>Since neither Studio nor Efficiency units indicate any bedrooms, gross rents may not exceed 30% of 60% of the effective AMI for zero bedrooms/one person.</p>
4/23/21	<p>2.11 Threshold; Operating Utilities</p> <p>&</p> <p>2.12 Threshold; Public Water/Sanitary Sewer/Storm Sewer</p>	<p>Question: Q0331_02 If a Utility Letter from the Power Company or Water/Sewer Provider references the number of units but the development has a revised unit number will the letter be accepted so long as the proposed unit count for the development is less than or equal to the units referenced in the supporting documentation?</p> <p>Answer: The QAP states the following:</p> <p>Threshold Criteria, Operating Utilities:</p> <ul style="list-style-type: none"> • “The Application must include a letter from the appropriate authorized utility authorities confirming the availability of operating utilities at the proposed development site.” • Minimum Documentation: “Letter(s) from authorized utility authorities that includes project name, address, or parcel ID and confirms that utilities will be available. The letter(s) must be dated within 6 months of Application Submission.” <p>Threshold Criteria, Public Water/Sanitary Sewer/Storm Sewer:</p> <ul style="list-style-type: none"> • “A commitment can be subject only to conditions within the control of the Applicant. Letter(s) from the local public water and sewer authorities must document the availability of the existing public water and sewer service to the site.”

		<ul style="list-style-type: none"> Minimum Documentation: “Letter(s) from verifiable public water/sanitary sewer/storm sewer authority that includes project name, address, or parcel ID and confirms that utilities will be available. The letter(s) must be dated within 6 months of Application Submission.” <p>To meet the Minimum Documentation requirements, the letters from the utility authority and water/sewer authority must demonstrate availability to the site. Reference to the number of units is not required; however, if an authority sets forth capacity limits regarding the availability of service(s) to the site, such will impact the evaluation of availability.</p>
4/23/21	3.04 Scoring; Deeper Targeting	<p>Question: Q0303_01b Would the assumption of a Housing Assistance Payment (HAP) Contract qualify for 3 points under B. Deeper Targeting Through New PBRA Contracts?</p> <p>Answer: DCA would need to review the details of the HAP contract during application review to provide definitive guidance.</p> <p>Please note that <i>Deeper Targeting</i>, subsection B. states that, “New PBRA contracts do not include public housing units, bifurcation, or renewal of existing contracts. Properties with existing PBRA contracts are not eligible for these points.”</p>
4/23/21	3.04 Scoring; Deeper Targeting	<p>Question: Q0218_01 We are wondering if DCA could clarify if the specific circumstances of our 2021 9% application would potentially be eligible for the 3 scoring points applicable to Deeper Targeting Through New PBRA Contracts.</p> <p>We are joint-venture partners with a PHA for a planned two-phase re-development of previously existing public housing. The PHA converted the overall property, which consists of the two planned phases, to RAD in conjunction with the first phase. This first phase was awarded 9% credits in January, 2020 and closed its financing in Q4 2020. The RAD HAP contract applicable to the overall property, and includes RAD units that will be applicable to both the first phase and the planned second phase, has an effective date of December 1, 2019 and has an initial term of 20 years. HUD has initially approved of the HAP contract bifurcation between the two phases, however, the HAP contract bifurcation is not currently in place and will not be in place prior to the 2021 9% application submission for the second phase.</p>

		<p>Considering the RAD HAP contract will have a term greater than 10 years at the time of the second phase 2021 9% submission, this is not a renewal of an existing contract, RAD units will consist of at least 30% of the total units included in the 2021 9% application, and the HAP contract bifurcation will not be applicable nor in place at the time of the second phase application submission, would these scoring points for Deeper Targeting Through New PBRA be applicable to this second phase application under this scenario?"</p> <p>Answer: DCA cannot provide definitive guidance through the Q&A process. DCA would need to review all relevant submitted documentation during Application review to finalize a determination.</p>
4/23/21	3.05 Scoring; Desirable/Undesirable Activities	<p>Question: Q0419_01 Would a privately owned and operated gymnasium that is open to the public for a fee be eligible for points under "Community or recreational center"?"</p> <p>Answer: The QAP, Appendix II: Scoring, Section V, A.2., Category 'Community Assets', Item (I) states,</p> <p><i>“The following Desirable activities/characteristics are eligible for points” . . . "Community or recreational center (e.g. YMCA, Boys & Girls Club, public pool, public gymnasium, senior community or multipurpose facility)”</i></p> <p>A community or recreational center is understood to provide a place for social, educational, or recreational activities. Any amenity submitted under item (I) should clearly provide these activities to the community in which the proposed development is located. If the amenity information provided on the Desirable/Undesirable Certification Form does not demonstrate that it provides the aforementioned activities, the applicant should refer to QAP, Appendix II: Scoring Section I. Documentation and Justification, subsection A. Minimum Documentation, "...Applicants are required to submit all documents at Application Submission necessary to determine that the Application meets the criteria for points, regardless of whether they are listed in the minimum document requirements... In the event the Applicant submits an alternate document to a minimum document, a thorough explanation of the usefulness of this alternate document should be entered into the appropriate scoring justification section."</p>
4/23/21	3.08	<p>Question: Q0331_01</p>

	<p>Revitalization / Redevelopment Plans</p>	<p>Regarding QAP, Revitalization/Redevelopment Plans, A, #2: Does a Tax Allocation District (TAD) qualify under this category as a tax incentive?</p> <p>Answer: The QAP states:</p> <p>Scoring Criteria, Revitalization/Redevelopment Plans: <i>“One (1) additional point will be awarded if the Local Government demonstrates financial commitment to advancing the CRP in the form of funds raised, funds allocated, tax incentives, or local government fee waivers.</i></p> <ul style="list-style-type: none"> - <i>Funds raised or allocated are only eligible for this point if the amount raised would be eligible for at least one (1) point under subsection B. Third-Party Capital Investment.”</i> <p>O.C.G.A. 36-44-3(13) (click here) states the following:</p> <p><i>“ ‘Tax allocation district’ means a contiguous geographic area within a redevelopment area which is defined and created by resolution of the local legislative body of a political subdivision pursuant to subparagraph (B) of paragraph (3) of Code Section 36-44-8 for the purpose of issuing tax allocation bonds to finance, wholly or partly, redevelopment costs within the area.”</i></p> <p>TADs fund development through tax allocation bonds. This form of financial support for development constitutes “funds raised or allocated.” The funds would be eligible for points under this section provided the funding amount would be eligible for at least one point under subsection B. Third-Party Capital Investment.</p>
<p>4/23/21</p>	<p>3.08 Revitalization / Redevelopment Plans</p>	<p>Question: Q0413_01 We sent in a question (Q0226_07) which was answered. I don't think we thoroughly explained our issue, hence the answer we received was not clear to us. This could be a project specific question, but I'm not sure that you do this anymore, so here is our situation:</p> <p>We will be submitting a development in a QCT. Within 0.5 miles of our project site GDOT is finishing a \$27 MM project. We have documentation from GDOT on the over-all cost of the project, but they cannot break down their cost on a per linear foot or a per mile basis. Our thought is that we can show DCA the documentation from GDOT on their project, show what portion of the GDOT project falls within our 0.5 mile radius, breakdown the over-all cost of the GDOT project on a per foot basis and then multiply that amount by the number of feet within the 0.5 mile radius. Will this meet the QAP guidelines?"</p>

		<p>Answer: The QAP states the following:</p> <p>Scoring Criteria, Revitalization/Redevelopment Plans, B. Third-Party Capital Investment:</p> <ul style="list-style-type: none"> • <i>“This resulting investment must: Occur within a 0.5-mile radius of the proposed site; Be off site; and Serve the residents for the proposed development. DCA will only consider the amount invested within a 0.5-mile radius of the proposed site.”</i> • Relevant Minimum Documentation requirement: <i>“Evidence from the unrelated 3rd party demonstrating source of investment, amount of investment, and timeline for completion.”</i> <p>The proposed method of calculation is allowable but on its own does not ensure the circumstances will be eligible for points under this section. Points eligibility can only be determined by a DCA review of all documents submitted to confirm that all requirements of the section are met and that Minimum Documentation requirements are met.</p>
4/23/21	3.09 Scoring; Community Transformation	<p>Question: Q0411_P01 The QAP states that applicants seeking points under Community Transformation will be rated less competitively if <i>“The development proposed is within or overlaps a Defined Neighborhood already containing a Transformational Community initiative funded in 2018, 2019, or 2020.”</i> How do we identify the boundaries of community transformation initiatives?</p> <p>Answer: The “Community Transformation List and Maps” document posted to the DCA website (click here) contains descriptions and maps of Defined Neighborhoods of all applications awarded points under Community Transformation since the 2018 9% Credits Competitive Round.</p>
4/23/21	3.16 Scoring; Exceptional PHA Nonprofit/Public Housing Authority	<p>Question: Q0406_01 Previous years’ Exceptional PHA rubrics have had the “Excellent” threshold for Operating Sustainability of the Organization include the item “The PHA’s cash and investments are at least 50% of annual operating expenses for the most current year.” This language seems to be included to ensure that a PHA will be able to pay its expenses for 6 months if all revenues stop. There are some required expenses that some PHA’s must show that are not reflective of the overall health of the organization. Some expenses are simply “pass-through” expenses. For example, a PHA may provide housing assistance payments from resources it receives from HUD to residents or landlords. These expenses are merely passed through the</p>

		<p>entity for HUD compliance purposes. They are not a true expense to the PHA nor are they reflective of the PHA health. If all revenues ceased, including HUD funding, these expenses would cease as well. There are other non-cash expenses that must be included, but are not reflective of PHA health, such as depreciation. Would the agency be willing to amend the definition of this section to something similar to “The PHA’s cash and investments are at least 50% of its annual operating expenses (excluding pass through and non-cash expenses) for the most current year?”</p> <p>Answer: DCA declines to make any changes to the Exceptional PHA scoring rubric at this time.</p>
4/23/21	3.18 Scoring; Favorable Financing	<p>Question: Q0324_01 The DCA website shows a June 2021 deadline for CDB Grant requests. Therefore the CDBG deadline is after the LIHTC app May deadline. So, currently there is no way to know if a LIHTC app could claim points under Favorable Financing from CDBG, if the CDBG decision comes later than the LIHTC app submission. If a CDB Grant was applied for but not award it would also have major impact on the financial section of the LIHTC app. So, can you tell me if the deadlines could be adjusted so that the CDBG decision would occur prior the the LIHTC deadline?</p> <p>Answer: The decision over final approval for a grant/loan would affect the financial review of the application, so the entire financial model and due date for all financial commitments would need to be moved back, after the announcement of a CDBG award.</p> <p>As noted in the QAP, applicants will not be allowed to make any changes to a Submitted Application prior to the announcement of awards. DCA may allow Applicants to correct deficiencies in the Application if DCA does not approve a sufficient number of Applications to use all the Credit authority or meet applicable set asides available in an Application cycle and it receives Applications that are acceptable except for minor deficiencies that the Applicant can address within a reasonable period of time (generally not to exceed 10 business days).</p> <p>As a result, the application deadline of May 21st will not be moved. Any funding source not finalized by this deadline must be finalized by the alternate financing deadline (see Q0308_01 for more information).</p>
4/23/21	3.19	<p>Question: Q0308_01</p>

	<p>Scoring; Historic Preservation</p> <p>&</p> <p>3.18</p> <p>Scoring; Favorable Financing</p>	<p>Has DCA discussed extending the due date for Historic Part 2 and Georgia Part A documentation as they did in 2020 due to the Historic Preservation Division and National Park Service delays created by Covid 19?</p> <p>Answer: The QAP states the following:</p> <p>Threshold Criteria, section Project Feasibility, Viability Analysis, & Conformance with Plan, subsection Commitments: <i>In the case of public financing which is under final consideration at the time of Application, but is not awarded funding, the Applicant may secure alternate financing provided related Application documents are submitted to DCA on or before the date noted on Exhibit A DCA Pre-application and Pre-Award Deadlines and Fee Schedule. Failure to provide the required documentation for USDA, FHLB-AHP, HUD alternative financing, <u>and/or the National Historic designation</u> as stated above may result in a Threshold failure.</i></p> <p>The deadline noted on Exhibit A, “<i>Alternate Financing Deadline, if Notification deadline has not or will not be met</i>” is July 22nd, 2021. This deadline is also applicable to Scoring Criteria sections that are dependent on the above-referenced funding awards, including:</p> <ul style="list-style-type: none"> • Favorable Financing • Historic Preservation, subsection A. Historic Tax Credit Proceeds <p>Applicants seeking points based on funding sources not finalized as of the May 21st 9% Credits application deadline have until July 22nd to submit all relevant documentation. At this time, DCA will not be extending this deadline.</p>
<p>4/23/21</p>	<p>3.21</p> <p>Scoring; Underserved Populations</p>	<p>Question: Q0326_02 My question is related to minimum documentation for Underserved Populations. This section states the following:</p> <p>Scoring Criteria, Underserved Populations, B. Tenant Selection Preference: <i>“Minimum Documentation: Documentation demonstrating HUD’s review and approval of the terms and structure of the preference”</i></p>

		<p>PHAs operate their Section 8 Housing Choice Voucher Programs under an Administrative Plan. The Administrative Plan contains information and requirements that the PHA will adopt and use in the implementation of the Project Based Vouchers. HUD does not require the submission of the Administrative Plan for review and approval. Yet, DCA is requiring PHAs to submit and request a HUD review and approval that is not required under the Housing Choice Voucher Program regulations. We have attached verification of the program regulations and an email from the Atlanta Office of HUD that verifies that HUD approval is not required. Our Housing Authority’s Administrative Plan is compliant with the HUD rules. Will DCA accept the Administrative Plan with the required language and recognize that documentation of HUD approval is not required in this matter?</p> <p>Answer: The Minimum Documentation requirement is for approval of the tenant selection preference itself, not HUD approval of the overall Administrative Plan. This Minimum Documentation requirement, evidence that HUD has approved the tenant selection preference, is indeed required. Below is an explanation of the context based on communications from HUD associated with applicants who have received points under a similar section under prior QAPs. This explanation is for clarification of DCA policy purposes only and cannot be used as legal advice.</p> <p>The tenant selection preference described in the 2021 QAP contravenes 24 CFR 982.207(b)(3) and 24 CFR 983.251(d). PHAs may administer a tenant selection preference for households with disabled persons, but PHAs may not implement a preference based on <i>specific</i> disabilities. In certain instances, HUD has approved waivers of these regulations on a temporary basis to counteract the circumstances resulting in the DOJ <i>Olmstead</i> Settlement Agreement.</p> <p>PHA Administrative Plans that have received such a waiver and said waiver has not expired are eligible for points under this subsection.</p>
4/23/21	3.25 Scoring; Property Size	<p>Question: Q1209_20 Please confirm that manager units are not a part of the unit count that is eligible for points. For example, there are 100 units and one manager unit (101 units total). Still eligible for 70-100 units?</p> <p>Answer: This section differentiates applications based on the size of the property, which does not vary based on unit designations. All units, including manager units, contribute towards the count of “Units at the Existing Property.”</p>

4/23/21	5.00 Manuals, Market Study Manual	<p><i>This Q&A was originally posted on 3/29/21. Update to answer below in red.</i></p> <p>Question: Q0317_01 On the top of page 6 of 10 (Section F. Community Demographic Data)</p> <p>DCA has a proposed time of market entry at 2022. It could be unlikely that a new construction award made in late 2021 will be built and open for market entry in 2022. Should the market entry date be moved up a year to 2023?</p> <p>Answer: “The Market Study must provide the following demographic information for the PMA (historical and current data/estimates). Include data on population and households at the proposed time of market entry (i.e. 2022).(p.6)”</p> <p><i>The market entry date in the 2021 Market Study manual should reference the projected placed in service date. The manual has been revised accordingly.</i></p>
4/15/21	2.07 Threshold; Environmental Requirements	<p>Question: Q1106_01 If an applicant is already going through the 8-step process with HUD, does DCA impose any additional requirements regarding the 8-step process? Is it satisfactory to just provide documentation to DCA evidencing that we are completing the full 8-step process with HUD separately, or do we need to complete any of the same steps duplicatively with both HUD and DCA?</p> <p>Answer: DCA still requires applicants to undergo the 8-step process if the applicant is currently going through the process with HUD if the project is new construction or substantial improvement to a property located in a 100-year floodplain. The 8-step process is also required if the project will impact wetlands, and federal funds are included in the financing.</p> <p>However, applicants may not need to repeat all of the steps and may be able to instead submit documentation regarding steps already completed. These situations will be handled on a case-by-case basis. Applicants should email HFDround@dca.ga.gov with project-specific questions regarding the 8-step process and DCA staff will request the necessary documentation.</p>
4/15/21	2.17	<p>Question: Q0310_01 The QAP requires 20% improvement in duct and envelope leakage after pre-testing.</p>

	<p>Threshold; Building Sustainability</p>	<p><u>Threshold, Building Sustainability</u>: “Rehab units are required to achieve a 20% improvement over existing conditions based upon pre-rehabilitation ‘duct leakage’ and ‘dwelling unit air filtration’ rates, or the above specified duct and envelope leakage rates.”</p> <p>My question is if we are not able to pre-test, is it harder to meet the code maximum of 8% of floor area leakage?</p> <p>Answer: If for some reason pre-testing is not able to occur to determine a baseline, then you would need to follow the measured duct and building envelope leakage requirements for new construction.</p> <p>For the “harder to meet the code maximum” question, that is a determination better answered by your Architect and Sustainability Consultant.</p>
<p>4/15/21</p>	<p>3.04 Scoring; Deeper Targeting</p>	<p>Question: Q0312_01 Under <i>Deeper Targeting/Rent/Income Restrictions</i>, the QAP states "the overall AMI percentage will be calculated based on the total residential units. (Common spaces and employee units will not be included in the total residential units.)" Should the overall AMI percentage as it relates to Deeper Targeting Subsection A instead be based off "total affordable units" rather than "total residential units?" Otherwise it seems impossible to provide at least 10% market unrestricted units for Section XI. Mixed Income Development while also meeting the 58% Deeper Targeting threshold if the calculation is based on "total residential units" vs. "total affordable units."</p> <p>Answer: Affordable units determine the overall AMI. As stated in subsection <i>A. Deeper Targeting Through Rent Restrictions</i>:</p> <p><i>“Two (2) points will be awarded to Applications with an overall property area median income, <u>calculated based on the imputed income and rent limitations</u> (20%, 30%, 40%, 50%, 60%, 70%, 80%) for each affordable unit, equal to or less than 58%.</i></p> <p><i>Applicants may do so by utilizing either</i></p> <ul style="list-style-type: none"> • <i>income averaging, or</i> • <i>the 40% at 60% minimum set-asides and targeting units at lower levels.”</i>

4/15/21	3.05 Scoring; Desirable/Undesirable Activities	<p>Question: Q0304_01 Do "Goodwill" qualify as "Retail/clothing/department store? Is it an issue that the items are pre-owned?</p> <p>Answer: The QAP does not exclude stores selling pre-owned items from the "Retail/clothing/department store" category in Desirable/Undesirable Activities.</p>			
4/15/21	3.14 Scoring; Previous Projects	<p>Question: Q0309_02 In previous years DCA posted a list of previous projects within the past 6 years. Will DCA publish this list again? The GIS map of previously funded deals has various errors in regards to site jurisdiction (i.e. within or outside of city limits) as well as how the development was funded (i.e. competitive cycle or not). The list would help eliminate this confusion.</p> <p>Answer: The 9% Selection lists are located on DCA's website here https://www.dca.ga.gov/node/3814</p> <p>The Housing Tax Credit Properties Map reflects the information on our lists. Please submit details and screenshots of any errors you encounter through the Q&A Survey so we may assess and revise any posted resources accordingly.</p>			
4/15/21	3.18 Scoring; Favorable Financing	<p>Question: Q0309_01 DCA recently had a question about seller financing qualifying for Favorable Financing points (Q1030_02), and DCA's answer has led to some confusion for us. I would like to make sure I understand how DCA will calculate favorable financing points when the source of those funds is also the seller of the property. Here is our scenario:</p> <p>The seller of the property would like to offer the partnership a loan for the acquisition and rehab of the property in the amount of \$5MM. The sales price for the property will be \$2MM. It is our understanding that DCA will subtract the \$2MM sale price from the \$5MM loan amount and calculate the favorable financing points based on \$3MM ($\\$5MM - \\$2MM = \\$3MM$). Is that correct?</p> <p>Answer: Correct. See below, assuming hypothetical proposed development of 80 units:</p> <table border="1" data-bbox="919 1349 1755 1386"> <tr> <td style="width: 80%;"></td> <td style="width: 10%; text-align: center;">Sales price</td> <td style="width: 10%; text-align: center;">\$2M</td> </tr> </table>		Sales price	\$2M
	Sales price	\$2M			

		<table border="1" data-bbox="919 201 1755 375"> <tr> <td>Loan from seller</td> <td>\$5M</td> </tr> <tr> <td>Loan amount eligible for points consideration</td> <td>\$5M - \$2M = \$3M</td> </tr> <tr> <td>Units in proposed development</td> <td>80</td> </tr> <tr> <td>Favorable financing per unit, for points consideration*</td> <td>\$3M / 80 = \$37,500</td> </tr> </table> <p>* This assumes that the seller loan meets all Favorable Financing requirements and the seller-financing is the only source of funds under consideration for Favorable Financing points.</p> <p>The QAP states the following:</p> <p><i>“If the seller of the land/property (or any related party) is providing funds to finance the development and claiming these points, the sales price will be reduced from the total funds provided, to calculate the favorable financing points allowable.”</i></p>	Loan from seller	\$5M	Loan amount eligible for points consideration	\$5M - \$2M = \$3M	Units in proposed development	80	Favorable financing per unit, for points consideration*	\$3M / 80 = \$37,500
Loan from seller	\$5M									
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Units in proposed development	80									
Favorable financing per unit, for points consideration*	\$3M / 80 = \$37,500									
4/15/21	3.18 Scoring; Favorable Financing	<p>Question: Q0303_01c Does the funding from a HAP Contract fall into one of the Qualifying Sources for Favorable Financing?</p> <p>Answer: Housing Assistance Payment contracts do not qualify for points under <i>Favorable Financing</i>. This section states the following:</p> <p><i>“New loans or new grants from the following sources that will provide new capital funding will qualify for points under this category.”</i></p> <p>HAP contracts financially support a property’s operating expenses, not capital expenses.</p>								
3/29/21	1.12 Core Plan; 4% Federal Credit – Bond Financed Projects	<p>Question: Q0222_03b When the bond application is available is there a review process for all applications similar to the 9% round or is it first come, first serve? We are trying to create a timeline and understand the needed preparation.</p> <p>Answer:</p>								

		Applications will be competitive and not first come first serve. Application documentation required will be announced in advance of any submission deadline, when DCA has resources available. Please see 2021 <i>QAP</i> for applicable Threshold and Scoring criteria.
3/29/21	1.18 Core Plan; Evaluation of 9% Tax Credit Competitive Applications	<p>Question: Q0224_04 Will DCA fund two applications in the same City in DeKalb County if both are the highest scoring projects in the county and the market will support both projects?</p> <p>Answer: It is possible, but not a guarantee, both will be funded.</p> <p>“DCA will select up to two Metro Pool Applications located in the same Local Government Boundary” (Core 27).</p> <p>“Applications with the highest DCA score and favorable market studies will be allocated resources provided that only one Application is submitted in the market area and provided all set asides have been met. If more than one project receives a competitive score in the same market area and will serve the same tenancy, DCA will select the higher scoring Application. For purposes of this subsection, Family, Elderly, HFOP, and Other are each distinct tenancies.” (Core 26)</p>
3/29/21	3.05 Scoring; Desirable/Undesirable Activities	<p>Question: Q0226_05 The QAP defines a food desert as "a low-income census tract where a significant number or share of residents is more than 2 miles (USDA urban) or 20 miles (USDA rural) from the nearest supermarket." (Scoring, Page 7). However, the USDA definition for food deserts is based on a 1-mile rather than 2-mile distance, measured in terms of radius. If a site is within a 2-mile radius of a supermarket and therefore meets the QAP definition for being outside of a food desert, but is over a 1 mile radius and therefore shows as being within a food desert according to the USDA definition, would it be considered within a food desert and therefore subject to the Undesirables point deduction?</p> <p>Answer: This section will be scored using the QAP definition of food desert. Applicants must submit all required minimum documentation.</p>
3/29/21	3.05	Question: Q0204_01

	Scoring; Desirable/Undesirable Activities	<p>Would a UPS Store/FedEx or similar count as a "post office" and if not what is the justification for not including them? It would appear that these businesses are able to provide the same services as a USPS office.</p> <p>Answer: The 2021 QAP list of Desirable Activities specifies post office. Post offices are branches of a public agency that administers mail. UPS and FedEx are not considered post offices.</p> <p>Individuals who believe that branches of UPS, FedEx, or other similar companies should be eligible for points under this category for a future QAP should submit the comment and supporting arguments to the year-round QAP online survey (click here).</p>
3/29/21	3.06 Scoring; Community Transportation Options	<p>Question: Q0226_06 Under <i>Community Transportation Options, A. Transit-Orientated Development</i>, the QAP states that "a transit hub is a station that has three or more bus routes, rail options, and/or other affordable mass transit options." My question is, what qualifies as a station? Is it any stop that has three or more routes/rail options? Or does it need to be a large structure owned by a transit authority?</p> <p>Answer: The QAP does not define the term station. The definition of transit hub in this subsection is based on the number of bus routes, rail options, and/or other affordable mass transit options.</p>
3/29/21	3.06 Scoring; Community Transportation Options	<p>Question: Q0205_03 One of the <i>Community Transportation Options</i> Minimum Documentation requirements is the following:</p> <ul style="list-style-type: none"> • “Walking distance route obtained from Google Maps from the geo-coordinates of the pedestrian site entrance to the transit stop.” <p>We have an approval letter for a proposed crosswalk from the county. Our Project Team is responsible for constructing the crosswalk as part of the development. The proposed crosswalk is to give our residents better access to the existing bus stop.</p> <p>Google maps won't recognize that route to the transit stop because it's a new crosswalk and Google Maps won't be up-to-date regarding this at the time of application submission. As alternate documentation, could we show the existing route we are taking via Google Maps, with Geo Coordinates and add in a in</p>

		<p>map showing the alternative route with new proposed crosswalk and Geo Coordinates? We would also include the letter from the county.</p> <p>Answer: <i>Scoring Criteria, Documentation and Justifications</i> in the QAP states the following:</p> <p>“Applicants are required to submit all documents at Application Submission necessary to determine that the Application meets the criteria for points, regardless of whether they are listed in the minimum document requirements...<u>In the event the Applicant submits an alternate document to a minimum document</u>, a thorough explanation of the usefulness of this alternate document should be entered into the appropriate scoring justification section.”</p> <p>This guidance applies to Community Transportation Options as it does to all Scoring sections.</p>																
<p>3/29/21</p>	<p>3.07 Scoring; Quality Education Areas</p>	<p>Question: Q0222_03a The Middle and High school (typical grade clusters) are above CCRPI average. But the Elementary School, grades 3-5, averages 77.75 (above avg) for 2018 & 2019 and then the Primary School, K-2, averages 77.4 (below avg) for 2018 & 2019. Would the elementary school, grades 3-5 be eligible to take all 3 points for this section?</p> <p>Answer: Points are determined by the number of grades within qualifying schools, not by the number of qualifying schools. This captures the difference between, for example, a qualifying school serving 6 elementary grades (K-5) versus a qualifying school serving two elementary grades (e.g., 1st and 2nd grades only). “Qualified” is based on CCRPI scores or BTO designations as described in the QAP.</p> <p>Applicants are only eligible for all 3 points in this section if all grades K-12 qualify and the property has a Family tenancy. The below table illustrates the qualifying grades for this hypothetical application:</p> <table border="1" data-bbox="898 1161 1774 1409"> <thead> <tr> <th>School</th> <th>Grades</th> <th>School Qualifies?</th> <th>Grades Eligible for Points Consideration</th> </tr> </thead> <tbody> <tr> <td>Primary School</td> <td>K-2</td> <td>No</td> <td>0</td> </tr> <tr> <td>Elementary School</td> <td>3-5</td> <td>Yes</td> <td>3</td> </tr> <tr> <td>Middle School</td> <td>6-8</td> <td>Yes</td> <td>3</td> </tr> </tbody> </table>	School	Grades	School Qualifies?	Grades Eligible for Points Consideration	Primary School	K-2	No	0	Elementary School	3-5	Yes	3	Middle School	6-8	Yes	3
School	Grades	School Qualifies?	Grades Eligible for Points Consideration															
Primary School	K-2	No	0															
Elementary School	3-5	Yes	3															
Middle School	6-8	Yes	3															

		<table border="1"> <tr> <td>High School</td> <td>9-12</td> <td>Yes</td> <td>4</td> </tr> <tr> <td colspan="3">Total Qualifying Grades:</td> <td>10</td> </tr> </table> <p>This application has more than 7 but less than 12 qualifying grades. Therefore, this application would be eligible for 1.5 points, per the points table from this section.</p>	High School	9-12	Yes	4	Total Qualifying Grades:			10
High School	9-12	Yes	4							
Total Qualifying Grades:			10							
3/29/21	3.08 Revitalization / Redevelopment Plans	<p>Question: Q0226_07 If a City and/or Transportation Authority, who is performing the work, will not provide/calculate a breakdown for each capital investment within a 0.5 mile radius, how should we calculate the capital improvement costs to meet DCA's standards?</p> <p>Answer: Minimum Documentation for subsection <i>B. Third-Party Capital Investment</i> requires “evidence from the unrelated 3rd party demonstrating source of investment, amount of investment, and timeline for completion.”</p> <p>Without this documentation from the unrelated 3rd party responsible for the investment, applicants cannot receive points in this subsection.</p>								
3/29/21	3.10 Scoring; Stable Communities	<p>Question: Q0209_02 In Section B. Local Health and Economic Indicators which metric is metric 1, 2, 3 out of Life Expectancy, Health Insurance Rate, Unemployment Rate?</p> <p>Answer: The metrics in subsection <i>B. Local Health and Economic Indicators</i> are not numbered. Points are calculated based on the number of indicators for which census tracts have values above 60th percentile (for Median Income, 60th percentile or 80th percentile), as displayed in the Local Indicator Points table and Housing Tax Credit Properties Map posted to the DCA website (click here).</p> <p>For example, consider the following two census tracts:</p> <ul style="list-style-type: none"> • Census Tract A: the only qualifying metrics are that Employment Rate and Health Insurance Coverage are both above the 60th percentile • Census Tract B: The only qualifying metrics are that Median Income is between the 60th and 80th percentiles and Life Expectancy is above the 60th percentile 								

		In both instances, the applications are eligible for 2 points under this section.
3/24/21	2.07 Threshold; Environmental Requirements	<p>Question: Q1209_01 Are the requirements of Threshold, Section VII (<i>Environmental Requirements</i>) subsection B2 (<i>Additional Environmental Requirements for HOME/HUD-funded Projects, Including but not Limited to PBRA</i>) triggered only if the PBRA is new and provided by DCA? Does this apply to projects with existing PBRA provided by HUD?</p> <p>Answer: These requirements are related to DCA-administered HUD funding. They do not apply to projects with existing PBRA provided by HUD.</p>
3/24/21	2.08 Threshold; Site Control	<p>Question: Q0205_01 Is an option contract that is digitally signed by the current owner valid for demonstrating site control? Electronic signatures are legally binding under Georgia law, but we'd like to confirm any documentation requirements for electronic signatures for the 2021 round.</p> <p>Answer: Electronic signatures are acceptable.</p>
3/24/21	2.10 Threshold; Site Zoning	<p>Question: Q0201_03A With COVID continuing to keep local government office closed or employees working remotely, many items are being pushed back to allow more pressing local government business to occur. Rezoning property continues to be pushed. Will DCA consider having an extended deadline for providing DCA the required zoning verification documentation, similar to last year? With the QAP being finalized in December, the timeline for rezoning a property, due to scheduling, continues to be extremely challenging during this continued pandemic.</p> <p>Answer: DCA will not grant such extensions at this time.</p>
3/24/21	3.18	Question: Q0222_02

	Scoring; Favorable Financing	<p>Please clarify whether Capital Magnet Funding provided by a conventional bank that is also a CDFI will be considered an eligible source under the Favorable Financing scoring category.</p> <p>Answer: CMF constitutes “Other Federal, State, or local grant funds or loans” (option eleven under <i>Favorable Financing</i>, subsection <i>A. Qualifying Sources</i>). Further, a financial institution eligible to administer such funds is certified as a CDFI and is therefore not purely a “conventional bank” (click here).</p> <p>Please note that <i>both</i> the funding source and the institution certification tied to the qualifying source influence eligibility determination. CDFI certification on its own does not qualify a source of funds under this section.</p>
3/24/21	3.18 Scoring; Favorable Financing	<p>Question: Q0212_01 For the Favorable Financing per unit calculation, do you divide the amount of favorable financing by total units or just LIHTC units, i.e. exclude market rate units from the calculation?</p> <p>Answer: Per unit means total units on the property to be developed.</p>
3/24/21	8.00 Other	<p>Question: Q0209_03 Can you tell me if the application requires a letter of support or approval from the government it will be located within?</p> <p>Answer: No. All required documents are listed in the Qualified Allocation Plan. The Core Application checklist also can be used as a guide. https://www.dca.ga.gov/node/7253</p>
3/15/21	3.05 Scoring; Desirable/Undesirable Activities	<p>Question: Q0201_06 Unfortunately, it seems the pandemic will continue to negatively impact businesses and even community amenities throughout the year. How will DCA evaluate desirables like restaurants and retail stores, etc., that were open at the time of application but closed at the time of DCA's review?</p> <p>Answer: An establishment that an applicant certifies is operational as of the Application Submission deadline (May 21, 2021) will qualify for points under this section. This certification is covered by the relevant clauses in the “Applicant Certification Letter” required for all applications and requires no separate actions specific to this section. Relevant clauses are below:</p>

		<p><i>“I understand that, in the event an allocation (or an allowance) for LIHTCs was obtained with false information supplied to the Georgia Department of Community Affairs (“DCA”), DCA will recapture the LIHTCs or request that the IRS deny tax credits to the Applicant entity. Also, a supplier, including the developer or owner, who knowingly provides false information will be barred by DCA from program participation for a period of five (5) years from the date the false information was discovered, in accordance with a Memorandum of Understanding between the Internal Revenue Service and the Georgia Housing and Finance Authority.”</i></p> <p><i>“I understand that any misrepresentations, which includes fraudulent, negligent, and/or innocent, in this Application or supporting documentation may result in a withdrawal of tax credits and/or HOME loan by DCA, my (and related parties) being barred from future program participation, and notification of the Internal Revenue Service and/or HUD.”</i></p>
3/15/21	3.10 Scoring; Stable Communities	<p>Question: Q0211_02 I'm looking into a site in one of the census tracts in your region, GEOID: 13015960701 in Bartow, for an affordable housing development. The DCA provided the attached excel document for scoring the Stable Communities Subsection B in the QAP but the census tract 13015960701 is missing from the data set. Do you happen to know why the data for that census tract isn't included?</p> <p>Did 13015960701 census tract split in 2020 from 13015960700 census tract?</p> <p>Answer: The scoring table referenced in your question is the “Local Health and Economic Indicators” document posted to the DCA website (click here) for <i>Scoring Criteria, Stable Communities</i>, subsection B.</p> <p>The three Census Bureau metrics from this document (Employment, Median Income, and Health Insurance Coverage) utilize American Community Survey (ACS) data aggregated over a 5-year period. The set of tract boundaries the Census Bureau uses for this 5-year period data aggregation is not the same as the most recently published tract boundaries. Because of this, applicants may not find the tract ID for their site in the DCA-published table.</p> <p>Applicants who have scored sites based on this table can continue to do so. To assist applicants who have been unable to determine which census tract in the table is associated with their site, DCA has updated the</p>

		<p>Housing Tax Credit Properties Map (click here) to include two additional map layers that include the data from the published <i>Local Health and Economic Indicators</i> table:</p> <ul style="list-style-type: none"> • “2019 Health and Econ Indicators” • “2018 Health and Econ Indicators” <p>Applicants can input the geocoordinates for their site into the map and click on the tract boundary to see the associated values used for <i>Scoring, Stable Communities</i>, subsection <i>B. Local Health and Economic Indicators</i>. Please note that a value of consecutive 9s (e.g., “99,999,999.00”) indicates the Census or CDC has not published data for that metric for that census tract.</p>
3/15/21	3.16 Exceptional Nonprofit/Public Housing Authority	<p>Question: Q0205_02 What is the required percentage that the Nonprofit who is the Managing General Partner get in the deal if partnering with a For profit developer? What are the other requirements for the Nonprofit other than what is already in the Exceptional Non Profit section of the QAP?</p> <p>Answer: <i>Scoring Criteria, Exceptional Nonprofit</i> states the following:</p> <p>As stated in <i>Scoring Criteria, Exceptional Nonprofit/Public Housing Authority</i>, subsection <i>A. Exceptional Nonprofit</i>, “only projects applying and eligible for the nonprofit set aside are eligible for points” in the Exceptional Nonprofit scoring section. To be eligible for Credit under the nonprofit set aside, applicants must meet all requirements stated in <i>Threshold, Eligibility for Credit Under the Non-Profit Set Aside</i>.</p>

<p>3/4/21</p>	<p>1.08 Core, Set Asides</p>	<p>Question: Q0303_01 The QAP states that an application is eligible for the Rehabilitation Set Aside if it is “<i>an existing occupied property previously funded by 9% or 4% Credit equity with building(s) in the Extended Use Period while the Plan is in effect.</i>”</p> <p>Since it is uncertain when the 2022 QAP will be signed by the Governor, is it possible for an application to be eligible for the Rehabilitation Set Aside but not enter the Extended Use Period until after the application deadline?</p> <ul style="list-style-type: none"> • If the property enters the Extended Use Period in July, the 2021 QAP will certainly be in effect. • If the property enters the Extended Use Period in December, the 2021 QAP might be in effect. <p>In our case, we have three properties that will enter the Extended Use Period in January of 2022.</p> <p>Answer: Please note the following from <i>Core, Eligibility of Certain Project Configurations</i>:</p> <p>“DCA will not consider 9% Credit Applications for the preservation of existing Housing Credit developments with a placed-in-service date that is within 15 years of Application Submission (May 21, 2021).”</p> <p>The QAP does not establish an end date for how long the 2021 QAP will “be in effect,” as this depends on when the Governor signs the QAP. Therefore, in any case where the eligibility of an application is in question, DCA staff will confirm eligibility based on the above provision from <i>Eligibility of Certain Project Configurations</i>.</p> <p>Based on this review method, absent further evidence to the contrary, the above-referenced properties transitioning into the Extended Use Period in January 2022 are not eligible for consideration under the <i>Rehabilitation Set Aside</i>.</p>
<p>3/4/21</p>	<p>1.23 Core; DCA Pre-Application Fees and Deadline Schedules</p>	<p>Question: Q0304_02 The QAP states that the Qualification Determination fee is \$1,000.</p> <p>If a pre-app QD determination comes back as conditional on adding a partner for Experience, does an additional \$1,000 fee need to be submitted at Full Application submission with the updated QD package showing the new partner or does the original pre-app \$1,000 QD fee cover it?</p>

		<p>Answer: This would be a continuation of DCA’s initial review at pre-app and no new \$1,000 QD fee would be required at Application.</p>
3/4/21	1.23 Core; DCA Pre-Application Fees and Deadline Schedules	<p>Question: Q0304_03A The QAP states that the Qualification Determination fee is “Required for all Deals” (see <i>Core, Exhibit A, DCA Pre-Application Fees and Deadline Schedules</i>).</p> <p>“Deals” is capitalized, but is not in <i>Core, Definitions</i>. If we are submitting multiple pre-applications with the same project team for each one, do we need a \$1,000 application fee for EACH pre-application?</p> <p>Answer: The \$1,000 Qualification Determination fee applies to the Project Team, regardless of the number of deals submitted.</p> <p>Note: Project Teams may be reviewed for qualifications at Pre-Application or Application Submission. To receive a full Threshold review at Pre-Application under this section, Applicant must have the project team and construction type finalized by Pre-Application.</p> <p>So multiple submissions/fees are only required where there are differences in the Project Team.</p>
3/4/21	3.05 Scoring; Desirable/Undesirable Activities	<p>Question: Q0202_04 Pedestrian access to our site is by way of an easement, and we are wondering if this impacts how we measure distances for purposes of Desirable Activities.</p> <p>If pedestrian access to a site is by way of an easement that has been given to the partnership from an adjacent neighbor, is that acceptable to DCA or does the partnership have to own the land where pedestrian access exists?</p> <p>Answer: Driving or walking routes must originate from geo-coordinates of the pedestrian or vehicle site entrance and end at the geo-coordinates of the desirable amenity.</p> <p>The entrance geocoordinates should be used, even if access is by way of an easement.</p>

3/4/21	3.05 Scoring; Desirable/Undesirable Activities	<p>Question: Q0201_05 Would an outdoor community recreation facility with amenities like lighted baseball/softball fields, tennis courts, basketball courts, walking trail, etc. qualify as a community or recreational center (Item L) in the Desirables section? The QAP appears to allow outdoor facilities like a public pool to qualify, but we wanted to confirm that public, multi-use recreational facilities would also be eligible.</p> <p>Answer: Yes, an outdoor community recreation facility as described in your question would qualify under category L. as a community multi-purpose facility as stated in the QAP Scoring Section V. Desirable/Undesirable Activities A. 2. Eligibility.</p>
3/4/21	3.18 Scoring; Favorable Financing	<p>Question: Q1030_02 If the seller of the land/property (or any related party) is providing funds to finance the development and claiming these points, the sales price will be reduced from the total funds provided, to calculate the favorable financing points allowable. Can DCA please comment and confirm whether the calculation actually affects the true sales price of the property and will impact the acquisition credits or is the calculation only used for the purpose of determining the eligible amount toward favorable financing points?</p> <p>Answer: The calculation is only used for the purpose of determining the eligible amount toward <i>Favorable Financing</i> points.</p>
3/4/21	7.00 Application Materials (Forms, etc.)	<p>Question: Q0304_03B On the Compliance History Summary and GA Compliance History Summary, do we show projects that are under construction or just projects that have already placed in service?</p> <p>Answer: In the performance workbook, list properties as follows:</p> <ul style="list-style-type: none"> • Capacity Tab/Form - list properties that have been awarded and that are under construction (under 100% complete) • Compliance History Summary Form / GA Compliance History Summary Form – show properties that have been completed
3/3/21	1.14	<p>Question: Q0220_04 For scattered sites, the QAP says we need to submit the Conceptual Site Development Plan. Does the site</p>

	Core, Eligibility of Certain Project Configurations	<p>plan need to meet all threshold requirements or are you just looking at the locations of the scattered sites for purposes of the pre-application?</p> <p>Answer: The Conceptual Site Development Plan submission for scattered sites at Pre-Application must meet the requirements for the following Minimum Documentation requirement under <i>Threshold, Site Information and Conceptual Site Development Plan</i>:</p> <ul style="list-style-type: none"> • “Conceptual Site Development Plan (Utilize DCA Cover Sheet Template)”
3/3/21	2.02 Threshold, Cost Limits	<p>Question: Q0220_02 Can you please clarify the extent to which historic tax credit properties can exceed cost limits? Is the amount of historic tax credit equity generated the extent to which we can exceed cost limits?</p> <p>Answer: <i>Threshold, Cost Limits</i>, states the following:</p> <ul style="list-style-type: none"> • “Cost Limits for Historic/Transit Oriented Properties: <i>The cost limits for historic rehabilitation projects that qualify for scoring points under Historic Preservation...will be increased to 110% [above the] applicable cost limits.</i>” • “Cost Waivers...<i>DCA will consider a cost waiver request for the following [three scenarios]...Costs for historic development above the project cost limits which will be covered by historic credit equity.</i>” <p>Yes, the Historic Credit Equity generated is the amount by which the applicant can exceed cost limits. In this case, as stated in the above QAP excerpt, the cost limit being exceeded is 10% above the normal cost limit if the applicant receives points under <i>Scoring, Historic Preservation</i>.</p> <p>9% Applicants may submit cost limit waivers at Application Submission or Pre Application. If DCA denies a cost waiver submitted after the Application Submission deadline, the Applicant will fail Threshold.</p>
3/3/21	2.02 Threshold, Cost Limits	<p>Question: Q0220_03 When will core app be posted? We need to submit a cost waiver.</p>

		<p>Answer: DCA anticipates publishing the 2021 core app in late April. For now, applicants may use the 2021 Cost Limit Testing Workbook posted on the “2021 Pre-Application Forms” section of the DCA website (click here).</p> <p>The Development’s Total Development Cost for purposes of cost limits excludes the following line items from the Uses tab in the Core Application: “DCA-Related Costs,” “Local Government Fees”, the rent-up reserve, operating deficit reserve, and an upfront-funded replacement reserve, if applicable.</p> <p>Please see the 2020 Core App as an example for how the cost limits are calculated, with DCA excludable costs. See Part IV-Uses, J163-J166.</p>
3/3/21	4.00	<p>Question: Q0220_01 <i>Appendix III: Compliance Monitoring Procedures</i>, states the following: “Applicants must ensure the management company included in all applications is approved per DCA’s Management Company Approval policy...”</p> <p>Is my property management company on DCA’s list of approved management companies?</p> <p>Answer: DCA has not yet published a list of approved management companies. DCA will publish this list after June 30, 2021. For details regarding management company qualifications, please see DCA’s Management Company Approval policy (click here).</p>
3/2/21	2.20 Experience, Capacity, and Performance Requirements for General Partner and Developer Entities	<p>Question: Q0227_01 For Probationary Designation review, does DCA require anything specific for "evidence" of five or more years of full time employment in the industry and material participation in the development of at least three successful tax credit developments? Is a written summary of experience and resume sufficient or are there specific documents or forms of evidence required?</p> <p>Answer: A written summary and resume are sufficient. DCA may request follow up documentation and/or clarification upon review.</p>
3/2/21	2.20	<p>Question: Q0226_03</p>

	Experience, Capacity, and Performance Requirements for General Partner and Developer Entities	<ul style="list-style-type: none"> • Are financial statements required for all principals filing a Performance Workbook? I don't see it listed as a requirement in the Performance Workbook but it's shown on the checklist on the main Pre-Application form. • We have the same team that was qualified last year, do we submit financial statements or are they "upon request" like the Credit & Criminal Release? <p>Answer: Financial statements are not required at Pre-Application unless requested by DCA during the Qualification review.</p>
3/2/21	2.20 Experience, Capacity, and Performance Requirements for General Partner and Developer Entities	<p>Question: Q0225_02 The below QAP provision describes the grandfathering process – that if an entity received a “Qualified” letter in the 2020 round, they don’t need to re-submit documentation related to Experience for the 2021 round (“grandfathering,” as the QAP provision below refers to it).</p> <p>Does this also apply if you were qualified based on “grandfathering” in the 2020 round? That is, if I submitted a 9% application during the 2020 round but I was grandfathered in based on submitting Experience documents during the 2019 round, do I need to now re-submit Experience documents (syndicator letters, etc.) for the upcoming 2021 round?</p> <p>The relevant QAP provision is the following:</p> <p><i>“A certifying entity that was deemed to meet experience requirements in 2020 is only exempt from submitting documentation of experience for the 2021 round. All other sections—both capacity and compliance—of the performance workbook must be completed. Only those certifying entities that have received a determination letter of “Qualified” in the 2020 round will be deemed to qualify under grandfathering.”</i></p> <p>Answer: Grandfathering also applies where an entity was qualified based on grandfathering in the 2020 round. Grandfathering turns on the receipt of a “Qualified” determination letter from DCA in the prior year’s round.</p>
3/2/21	6.00	<p>Question: Q0226_04</p>

	Emphasys Application Portal	<p>On Emphasys, in cases where a consultant is filing an application on an applicant's behalf, can the consultant file it via his own Emphasys account, or would you prefer he do so via the applicant's account?</p> <p>Answer: A consultant may fill out the application, so long as all required documentation for Qualification Determination review and/or waiver reviews are provided.</p>
3/2/21	7.00 Application Materials (Forms, etc.)	<p>Question: Q0226_02</p> <ol style="list-style-type: none"> 1. Can you confirm if the Competitive Pool designation and/or the LIHTC Election designation selected on the Submission Form & Checklist tab of the Pre-Application Submission form can be adjusted from pre-application submission to what will be presented in the 2021 9% full application submission? Specifically for the LIHTC Election, can there be a change from Income Average to 40% of Units at 60% AMI from pre-app to full app? 2. Similarly, regarding the Competitive Pool designation, the pre-app submission form only allows for one pool to be selected. If an applicant selects "9% Other Metro" in the pre-app submission form, can that applicant apply under an additional pool at the full application submission, such as "9% Other Metro" and "9% RAD Set-Aside"? 3. Can you confirm if the information presented in the "Rent Schedule & Summary" tab within the pre-application submission form can be adjusted from pre-application submission to what will be presented in the Core Application with the 2021 9% full application submission? <p>Answer: Yes. The information can be changed for a new construction application requesting solely a Qualification determination. Per the 2021 QAP, Threshold page 33:</p> <p><i>“Project Teams may be reviewed for qualifications at Pre-Application or Application Submission. To receive a full Threshold review at Pre-Application under this section, Applicant must have the project team and construction type finalized by Pre-Application. If either is ‘To Be Determined,’ DCA will not conduct a team qualifications review during the Pre-Application review phase.”</i></p>

		<p>If the applicant is requesting other waivers (underwriting waivers, construction waivers, relocation, income averaging unit distribution, etc.), a change in the location, geographic pool, unit mix, minimum set aside election, will require DCA's re-review of the waiver and new information.</p>
2/26/21	1.14 Core, Eligibility of Certain Project Configurations	<p>Question: Q0224_01 Would a site bifurcated by an alley or lane be considered a scattered site? If so, would these sites be able to share amenities or would a waiver be needed to allow for sites to share amenities.</p> <p>Answer: Under Section 42, scattered sites are defined by their proximity and not necessarily the presence of an alley or lane. Per QAP Core Section 14.A., sites must have no more than six (6) non-contiguous parcels within a ½ mile radius and a minimum of four (4) residential units per parcel, except for parcels on which the community center is located. Note that Applications must include a legal opinion on scattered site to support the project's development. Please provide both a legal opinion and a Conceptual Site Development Plan for DCA review at Pre-Application.</p> <p>Please note per 2021 QAP Threshold, Section XIII. Required Amenities, for scattered site projects, required amenities must be met for each non-contiguous parcel. If the site is considered a scattered site per the legal opinion, an architectural waiver is required at pre-application for the site for determination.</p>
2/26/21	1.15 Core; Submission Requirements and Award Limitations	<p>Question: Q0217_02 We will be submitting an application for a rehab in the upcoming 2021 round. The property is owned by a housing authority, and they are operating with a skeleton staff because of Covid. We are trying to prepare Architectural Standards waivers, as well as the Rehabilitation Work Scope and PNA Fannie Mae forms, but due to Covid-related staffing issues, the housing authority has been unable to provide us with the help necessary to complete this work. Would it be possible for us to submit these documents at some point beyond the March 5th pre-app deadline? It will allow us to provide you with far more accurate information.</p> <p>Answer: The deadlines will not be extended for rehab waivers.</p> <p>Please note: Four (4) Applications will be selected that propose rehabilitation of an existing occupied property previously funded by 9% or 4% Credit equity with building(s) in the Extended Use Period while the Plan is in effect.</p>
2/26/21	1.18	Question: Q0223_02

	<p>Core, Evaluation of 9% Tax Credit Competitive Applications</p>	<p>Please clarify what types of proposed developments are eligible for consideration under the 2021 9% Competitive Round.</p> <p>Answer: Please note that <i>Core, Evaluation of 9% Tax Credit Competitive Applications, Selection, Sequence of Competitive Round Award Determinations</i> lists the competitive evaluations that comprise the 2021 9% Competitive Round:</p> <ul style="list-style-type: none"> • Rental Assistance Demonstration Set Aside • Rehabilitation Set Aside • New Supply <p><i>Core, Definitions</i> defines New Supply eligibility as “Applications proposing new construction or Adaptive Reuse.”</p> <p><i>Core, 9% Round Set Asides</i>, states that only the following types of properties are eligible for the Rehabilitation Set Aside: “existing occupied propert[ies] previously funded by 9% or 4% Credit equity with building(s) in the Extended Use Period.”</p>
<p>2/26/21</p>	<p>1.23 Core; DCA Pre-Application Fees and Deadline Schedules</p>	<p>Question: Q0201_04 The QAP states on the Exhibit A DCA Pre-Application Fee and Deadline Schedules:</p> <p><i>Qualification Determination (Required for all Deals) - \$1,000 with a 9% Deadline of 3/5/21</i></p> <p>In Threshold XX. Experience, Capacity and Performance Requirements for General Partner and Developer Entities it is stated:</p> <p><i>Project Teams may be reviewed for qualifications at Pre-Application or Application Submission.</i></p> <p>The second statement contradicts the first statement saying that the Qualification Determination is required for all deals.</p> <ul style="list-style-type: none"> • Please clarify whether this is a requirement at pre-app for all deals. • If not, is the \$1,000 Qualification Application Fee still due with the full application May 21, 2021 on top of the 2021 Credit Application Fee and Third Party Review Fee.

		<p>Answer: Applicants are not required to submit Qualification documentation and the corresponding fee at Pre-Application. Project Teams may be reviewed for qualifications at Pre-Application or Application Submission.</p> <p>The \$1,000 Qualification fee is required for all applications.</p> <p>If applicants request a Qualification review at Pre-Application, it is due by March 5.</p> <p>If Applicants choose to request the Qualification review as part of the Full Application (May 21), then the fee can be paid at the Full Application submission deadline (May 21st).</p> <p>The Qualification review fee is an additional, separate cost to the 2021 Credit Application Fee (\$6,500 For Profits; \$6,500 For Profits/Non- profits Joint Venture; \$5,500 Non-profits).</p>
2/26/21	2.02 Threshold; Cost Limits	<p>Question: Q0128_01 This question pertains to a rehabilitation application we will submit, wherein we are purchasing an existing affordable housing property from another affordable housing provider.</p> <p>DCA only allows cost limit waiver requests in three instances, listed under <i>Threshold, Cost Limits, Cost Waivers</i>. The third option is what we want to confirm we are eligible for. That third option allows cost waivers for...</p> <p>“Costs that are covered by funding from a foundation, other unrelated not-for-profit charitable organization, or governmental entity that is not DCA in the amount equal to or greater than the development cost that exceeds DCA’s unit cost limitations.”</p> <p>We would like to request the waiver based on a seller’s note.</p> <ul style="list-style-type: none"> • Question 1: Under this cost limit waiver option, are seller notes an allowable source of funding to cover the amount by which TDC exceeds DCA cost limits? • Question 2: In our case, the seller is a non-profit 501(c)(3) affordable housing provider. Does the seller constitute an “other unrelated not-for-profit charitable organization” that can provide the funding that covers the amount by which TDC exceeds DCA cost limits?

		<p>Answer:</p> <p><u>Answer to first question:</u> Seller’s notes are an allowable source of financing for covering the amount by which TDC exceeds DCA cost limits under this cost limit waiver option, provided the note meets the other requirements listed under this subsection (e.g., the seller’s note must be a cash-flow loan).</p> <p><u>Answer to second question:</u> An organization qualifies where there is no Identity of Interest between the parties.</p> <p>In <i>all</i> circumstances in which an application exceeds DCA cost limits, a cost limit waiver must be submitted. 9% Applicants may submit cost limit waivers at Application Submission or Pre-Application.</p>
2/26/21	2.03 Threshold; Tenancy Characteristics	<p>Question: Q0223_01 Our proposed project is an acquisition rehabilitation that was originally built in 1985 with HUD 202 funds. It is not a PHA property. The current tenancy allows ages 62+ as well as those ages 18+ with physical disabilities. Based on our interpretation, this would be a project categorized as "Other" tenancy. Please confirm this is correct. Also, QAP notes to contact DCA for instructions on this section no later than the pre-app deadline. Please provide guidance or instructions.</p> <p>Answer: First, please see question Q0223_02 pertaining to eligibility for consideration under the 2021 9% Competitive Round.</p> <p>For purposes of the tenancy question, the above interpretation is correct. As part of the Pre-Application and Full Application, if the above-referenced property is eligible for the 9% Competitive Round, please select Tenancy “other.”</p> <p>Please provide any supporting documentation tied to the property which lists the above tenancy restriction for DCA review.</p>
2/26/21	2.12 Threshold; Public Water/Sanitary Sewer/Storm Sewer	<p>Question: Q0211_01 We are contemplating doing a single family home ownership application in rural Georgia. In many rural areas and some metro areas, septic tanks are viable, reliable and serviceable options for sewer. The tanks and install costs are cheaper than public sewer connections and there is no monthly sewer expense to the resident. The maintenance is also fairly inexpensive with emptying every 3-5 years at an average cost of \$250, which is less than \$1200 for the initial 15 year compliance period. The QAP only speaks to public</p>

		<p>sewer. Will DCA consider a septic tank system for single family home ownership if public sewer is not available in an rural area?</p> <p>Answer To satisfy <i>Threshold, Public Water/Sanitary Sewer/Storm Sewer</i>, public water and sewer service must be available at the proposed development site at the time of Application Submission.</p> <p>Septic tanks are not allowable.</p> <p>Per 2021 QAP <i>Threshold, Public Water/Sanitary Sewer/Storm Sewer</i>, <u>public water and/or sewer availability cannot be contingent on the construction of a water/sewer system</u>, annexation of the property, or funding to the utility provider from an outside source.</p>
2/26/21	2.20 Threshold; Experience, Capacity and Performance Requirements for General Partner and Developer Entities	<p>Question: Q0224_02 I wanted to confirm that because we were "Qualified" in 2020 we don't need to submit the additional documents noted in the performance workbook pertaining to “Experience” requirements (8609's syndicator letters, etc.)</p> <p>Answer: Correct. The relevant QAP provision is the following, from <i>Threshold, Experience, Capacity, and Performance Requirements for General Partner and Developer Entities</i>, subsection <i>Requirements for Experience (Certifying Entity)</i>:</p> <p>“A certifying entity that was deemed to meet experience requirements in 2020 is only exempt from submitting documentation of experience for the 2021 round. All other sections—both capacity and compliance—of the performance workbook must be completed. Only those certifying entities that have received a determination letter of ‘Qualified’ in the 2020 round will be deemed to qualify under grandfathering.”</p> <p>Certifying entities that qualify under grandfathering are exempt from submitting the required documents related to Experience, such as the syndicator letters, IRS Forms 8609, and trailing twelve-month occupancy reports for each Successful Tax Credit Project.</p>
2/26/21	2.25 Threshold; Occupied Developments	<p>Question: Q0226_01 My question is about the following QAP provision from <i>Threshold, Occupied Developments, Relocation</i>:</p>

		<p>“For 9% Applications, DCA will not allow permanent displacement of tenants unless a waiver is obtained.”</p> <p>If the construction scope and timeframe require relocation over 12 months, is a waiver required?</p> <p>Answer: No. Relocation over 12 months is considered temporary, and therefore a waiver is not required. Please refer to the Temporary Relocation section of the manual for specific requirements in this scenario.</p>
2/26/21	3.05 Scoring; Desirable/Undesirable Activities	<p>Question: Q0111_02 Do “Family Dollar / Dollar General” qualify as “Retail/clothing/department store (full range of clothing/household items)”?</p> <p>Answer: “Family Dollar” and “Dollar General” both are considered retail stores under “Retail & Restaurants” in category b. of subsection <i>A. Desirable Activities</i>.</p>
2/26/21	3.14 Scoring; Previous Projects	<p>Question: Q0209_01 We are pursuing a property where approximately 80% of the property is located outside of the city limits and 20% is located inside the city limits. The site entrance will be located outside of the city limits and the buildings will be located outside of the city limits. Zoning will be through the County not the City. For the purposes of Previous Projects, would DCA consider this proposed development to be located within the city limits or outside the city limits?</p> <p>No approvals are expected to be necessary for the city. We have not gotten very far on water sewer letters or building permits but the County planning and zoning told us we didn’t have to go for a rezoning by the city if buildings were not within the city limits. We stated we would be using county water and sewer in our county rezoning request.</p> <p>Answer: For the purposes of <i>Scoring, Previous Projects</i>, DCA considers this proposed development to be located outside the city limits due to the fact that all buildings will be located outside city limits and all approvals necessary for construction will be outside the jurisdiction of the city.</p>
2/26/21	7.00 Application Materials; Pre-	<p>Question: Q0222_01</p>

	Application Instructions	<p>The instructions of the 2021 Pre-Application state that all applicants must submit a rent summary chart. If the site is "TBD" we are unable to submit proposed rents, max gross rents, utility allowances, etc. Is it ok for the applicant to leave this chart blank if the site is TBD?</p> <p>Answer The rent chart may be left blank if the site is TBD.</p>
2/18/21	1.13 Core; Financing Resources – HOME Loans	<p>Question: Q0121_01 Can you direct me to the CHDO Certification Application that is due at the time of Pre-Applications?</p> <p>Answer: Per the 2021 QAP, “DCA will select developments for purposes of [the CHDO] set aside through a Notice of Funding Availability announced as funds become available.” CHDO HOME funds are not allocated through the summer 9% Competitive Round. The 9% Competitive Round Pre-Application deadline is not applicable to any CHDO documentation submission requirements.</p> <p>CHDO HOME funds are allocated towards rental housing development through Notices of Funding Availability (NOFAs) that pair HOME funds with 9% Tax Credits. An organization’s CHDO status is confirmed during the NOFA application review process. Organizations interested in assessing CHDO eligibility in advance of a NOFA release should review HUD guidance on CHDO status (click here) and the DCA form used to confirm CHDO status during the most recent CHDO NOFA (click here). Please note that the DCA CHDO form is for reference only and may differ from what is utilized in a future NOFA.</p> <p>Click here to subscribe to the email list where CHDO NOFAs are publicized (click “Join our email list”).</p>
2/18/21	1.18 Core; Evaluation of 9% Tax Credit Competitive Applications	<p>Question ID: Q1217_02 Please clarify the tiebreaker (b), “Earlier year of the most recent 9% Credits award for the Local Government Boundary” from Core Plan, Section 18. Evaluation of 9% Tax Credit Competitive Applications, subsection D. Selection part 4. Tie-Breaker.</p> <p>Answer: This tiebreaker applies if tiebreaker (a) did not break the tie and the proposed sites of the tying applications are in different Local Government Boundaries (LGBs). To apply this tiebreaker, DCA will perform the following analysis:</p> <ul style="list-style-type: none"> • For each LGB associated with the tying applications, identify the most recent 9% Credit award

		<ul style="list-style-type: none"> Identify which of these most recent allocations is the oldest. The application in the LGB with the oldest of these allocations wins the tiebreaker. <p>This policy furthers DCA’s priorities for equitable geographic distribution of resources.</p>
2/18/21	3.00 Scoring; General	<p>Question ID: Q0129_01 In some sections of the QAP, such as those dealing with proximity to desirable/undesirable neighborhood characteristics or public transportation, distances are to be measured from the geocoordinates of the proposed main pedestrian or vehicular entrance to the property. In other sections, such as those dealing with proximity to previously-funded developments, the QAP is silent on the location of the "starting point" for measuring these distances. Should an applicant assume that the geocoordinates of the proposed main pedestrian or vehicular entrance to the property is the "starting point" in all cases?</p> <p>Answer: Where small differences in distance have a practical impact under the section goals, the QAP will specify a starting point (e.g., walking accessibility of an amenity).</p> <p>Some section goals are not sensitive to small distance differences (e.g., equitable allocation of DCA resources across the state). In such cases, DCA staff confirm point eligibility based on any of the following location information provided in the application:</p> <ul style="list-style-type: none"> Location information from the application’s general information section (geocoordinates or site address) Geocoordinates of the pedestrian site entrance <p>If an applicant notices a point differential based off measuring from a pedestrian/vehicle site entrance, geo-coordinates, or address, they should note the difference in the supporting documentation and applicant comment box of the application. In such instances where the QAP is silent on starting point and multiple starting points are relevant, the starting point location may be construed in favor of the applicant.</p>
2/18/21	3.02 Scoring; Applicability of Scoring Criteria	<p>Question: Q0111_01 On the chart on page 102 of the QAP it says max points for 9% New desirables is 20 and for 4% New is 12. In the explanation it only mentions the 20 points and no differentiation between 9% and 4%. To be sure I understand, new construction 4% can still score points in all the same Desirables categories, but the</p>

		<p>maximum points a new 4% application can get in that area is 12 as opposed to 20 points max for a new construction 9%?</p> <p>Answer: The above interpretation is correct. Per the description above the table, “Numbers in the below table indicate the maximum points that can contribute to the Application’s score from that section given the construction type and tax credit sought.”</p>
2/18/21	3.05 Scoring; Desirable/ Undesirable Activities	<p>Question: Q0202_02 I could not find a definition for (Elementary, Middle or High schools) pertaining to Section (J) section 2 of Desirable Activities. Does a Private school qualify?</p> <p>Answer For purposes of the 2021 Competitive Round, a private school qualifies under this subsection.</p>
2/18/21	3.06 Scoring; Community Transportation Options	<p>Question: Q1221_01 Will you please clarify what qualifies as a transit hub? Does it have to have three bus lines plus rail? Or does it have to have three of any (bus routes, rail options, or other mass transportation)?</p> <p>Answer: The QAP states: “For purposes of this subsection, a transit hub is a station that has three or more bus routes, rail options, and/or other affordable mass transit options.”</p> <p>“Three or more” applies to the list items and not bus lines specifically. A transit hub may qualify based on any combination of bus, rail, or other affordable mass transit options. Please review this scoring section for additional requirements related to transit hub qualification.</p>
2/18/21	3.07 Scoring; Quality Education Areas	<p>Question: Q1207_01 Points in <i>Quality Education Areas</i> are based on data from the Department of Education (DOE) gathered through standardized testing. Due to the pandemic, standardized testing did not occur, and the DOE will not release College and Career Ready Performance Index (CCRPI) scores or Beating the Odds (BTO) designations for 2020. How is DCA responding to this for purposes of 9% scoring?</p> <p>Answer: Applicants seeking points under this section can pursue either of the following:</p>

		<ul style="list-style-type: none"> • Qualifying schools with CCRPI – Applicants now have two, rather than three, years to use for qualifying schools. Click here to view the CCRPI Scores Table on the DCA website. • Qualifying schools with BTO – As signed by the Governor, the 2021 QAP provision detailing the BTO qualifications option referenced 2020 BTO designations. To allow applicants to utilize two years of BTO designations as intended, DCA’s Commissioner has signed an administrative amendment to the QAP allowing applicants to use 2018 and 2019 BTO reports to qualify schools. The amended 2021 QAP and announcement detailing the amendment are posted to the DCA website (click here).
2/18/21	3.07 Scoring; Quality Education Areas	<p>Question ID: Q0201_01</p> <p>I would like a clarification on the CCRPI qualifications listed below. The score table released most recently shows different information even for the same time periods from the previous table that was being used to score projects we are currently working on. The links below show the discrepancies mentioned:</p> <ul style="list-style-type: none"> • CCRPI Score Table from “2020 QAP and Related Documents webpage,” posted prior to 1/27/21: https://www.dca.ga.gov/sites/default/files/ccrpi_scores_table.pdf • CCRPI Score Table from “2021 QAP and Related Documents webpage,” posted 1/27/21: https://www.dca.ga.gov/sites/default/files/2021ccrpi_scores_table.pdf <p>Why do the 2019 values differ between these two tables? We have been working from the first set of guidelines in preparation for an application submission.</p> <p>Answer:</p> <p>The Georgia Department of Education (DOE) posted a revision to the 2019 scores after the initial release. As stated in the DOE CCRPI public release for 2019:</p> <p><i>“NOTE: The state-level 2019 CCRPI scores have been updated... Please note that district- and school-level scores did not change; this is an update to the state scores only.”</i></p> <p>The above-referenced table from the 2020 QAP documents webpage was published for purposes of the 2020 round, and the revision occurred after the release of that document.</p>

		For purposes of the 2021 round, DCA will allow scores to qualify based on the originally published 2019 scores, all of which are lower than the updated 2019 data. An updated CCRPI scores table has been posted to the DCA website (click here). Please note that in subsequent rounds the revised 2019 averages will apply.																					
2/18/21	3.10 Scoring; Stable Communities	<p>Question: Q1222_01 For the Local Health and Economic Indicators: If we use the 2015-2019 estimates, will we be comparing these estimates to the published percentiles that were based on the 2014-2018 estimates, or will we have to show that the 2015-2019 estimate is above the 60th percentile for that dataset?</p> <p>Answer: On January 15, 2021, DCA sent an email update indicating that the Census Bureau had released the 2019 update of the data used for scoring 9% Credit applications under the Stable Communities section. DCA has accordingly posted an updated version of the Local Health and Economic Indicators table on the DCA website (click here), which includes both 2018 and 2019 percentile calculations.</p> <p>Per the QAP: “Applicants cannot claim points based on a statistics set comprising values from both before and after a data update.” Thus, applicants have two paths for scoring under this subsection, illustrated in the below table.</p> <table border="1"> <thead> <tr> <th rowspan="2">Scoring Options</th> <th colspan="4">Metrics</th> <th rowspan="2">Maximum Points</th> </tr> <tr> <th>Employment rate</th> <th>Health insurance rate</th> <th>Median income</th> <th>Life expectancy</th> </tr> </thead> <tbody> <tr> <td>Using 2018 Census data</td> <td>> 2018 Percentile</td> <td>> 2018 Percentile</td> <td>> 2018 60th or 80th Percentile</td> <td rowspan="2">> Published percentile (only one)</td> <td>5</td> </tr> <tr> <td>Using 2019 Census data</td> <td>> 2019 Percentile</td> <td>> 2019 Percentile</td> <td>> 2019 60th or 80th Percentile</td> <td>5</td> </tr> </tbody> </table>	Scoring Options	Metrics				Maximum Points	Employment rate	Health insurance rate	Median income	Life expectancy	Using 2018 Census data	> 2018 Percentile	> 2018 Percentile	> 2018 60 th or 80 th Percentile	> Published percentile (only one)	5	Using 2019 Census data	> 2019 Percentile	> 2019 Percentile	> 2019 60 th or 80 th Percentile	5
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2/18/21	3.14 Scoring; Previous Projects	<p>Question: Q0121_02 If a project located in an unincorporated area was awarded credits but subsequently that area is annexed into a municipality, for purposes of scoring in the 2021 cycle, would that award be considered as being in the unincorporated area or the municipality?</p>																					

		<p>Answer: <i>Previous Projects</i> states in subsection A. that points “will be awarded if the proposed development site is within a current Local Government Boundary that has not been awarded 9% Credits...”</p> <p>The above language intends to equitably distribute 9% credits across local government jurisdictions. As such, DCA evaluates this section based on current municipal boundaries. A municipality that has annexed a property funded under a previous 9% Competitive Round has received the prior-year award.</p> <p>Where applicable elsewhere in the QAP, DCA approaches this analysis in the same way (e.g., tiebreakers).</p>
2/18/21	3.18 Scoring; Favorable Financing	<p>Question ID: Q0113_01</p> <p>If a certified CDFI Banking Institution is a lender on a development and has agreed to provide a construction and permanent source of funding that meets the four pre-requisite requirements of the Favorable Financing section of the QAP, but the funds used by that bank for the funding are not specifically designated as magnet funds, but general “bank funds”, would the financing still qualify for the favorable financing points? Some conventional banks have capital magnet or reinvestment funds specifically for this type of use, but the statement of “loans originated by a conventional bank are ineligible” appears to disqualify this situation.</p> <p>Answer:</p> <p>Per the 2021 QAP, qualifying sources must either meet the criteria for one of the first ten sources listed under <i>Favorable Financing</i> subsection A or constitute “Other Federal, State, or local grant funds or loans.” Further, “Loans originated by a conventional bank are ineligible.” Therefore, absent further information that clarifies how the hypothetical lending institution and sources of funds meet the criteria for one of the items under subsection A, the above-referenced financing opportunity would not qualify for points under <i>Favorable Financing</i>.</p>