

Analysis of Key Guide Provision Changes- February Draft/April Draft			
Guide Comment Area	Draft QAP Provision February 2016 Version	General Summary of Comments	Draft QAP Provision April 2016 Version
THRESHOLD			
3.1.1 Previous Project Performance	Deleted the language “within the previous five) 5 years.	Requested clarity regarding the deletion of the five (5) year provision.	Section has been revised to provide clarity and re-instate the five (5) year provision
3.3.2 Affirmative Fair Housing Marketing	The February draft indicated changes were pending.	No comments.	Section re-written to provide clarity.
3.4 Tenant Services	The February draft included language that projects that include PWD must include clear linkages with agencies providing services.	Commentators stated all projects include PWD.	Language was deleted.
3.5.1 Preference for Persons with Physical Disabilities	Changed language to require owners to include provision in lease that require the household to move to another comparable unit to make the UFAS unit available for a household that requires such a unit and added all projects must comply with Federal Section 504 of the Rehabilitation Act of 1973.	Comments agreed with this requirement.	Added language that includes “should there be a comparable unit available. Also added” UFAS and any other applicable laws or requirements, including without limitation Section 504 of the rehabilitation Act of 1973 (“Section 504”), the regulations implementing Section 504 at 24 CFR part 8, the American with Disabilities Act (“ADA”), and the 2010 ADA standards (as modified by HUD).
3.5.2 Family Housing Developments – Units Reserved for Persons with Disabilities	Increased the threshold requirement to hold targeted units to ninety (90) days.	Concerns that the additional 30 days would affect project operation.	Reduced the requirement to 60 days.

3.7 LIHTC and RHF Limits (renamed- Rental Housing Programs and Rental Housing Works Loan Requirements)	No change in original draft.	No comments.	This section has been revised for clarity.
3.8 LIHTC Award Limits	No change in original draft.	No comments.	Moved to its own section
3.8.3 (New) 3.9.3 Operating Expenses	No change in original draft.	Comments requested an increase in the operating expense range.	Annual Operating Expense range changed to “no less than \$4,000 per unit per year and not more than \$7,000 per unit per year.
3.8.8.3 (NEW) 3.9.8.3 Professional Fees	Developer’s Fee section added language to allow an additional five (5) percent of Developer’s fee to support a rental subsidy for a targeted population.	Comments requested clarity in this section.	Added language to clarify that the additional five percent will not be subject to 2.5 million dollar limit and to confirm rent subsidy will be used to fund the difference between 20% AMI and 60% AMI units.
3.12 (NEW) 3.13 Development Quality Thresholds	No change in original draft.	Comments and suggestions were made at a series of meetings with Construction Working Group to create better cost containment incentives in this section.	This section has been revised for clarity.
3.12.1 (NEW) 3.13.1 Criteria Applicable to All Projects	Added UFAS language.		Item 2: Updated language regarding UFAS requirements.
SCORING			
4.2.2 Community Impact Projects	Significant changes made to requirements for a concerted community revitalization plan.	Many comments received expressed concerns that the changes would significantly impact QCT projects throughout the state.	Section re-worked based on comments received.
4.2.3 Defined Planning Area	Revised to benefit projects not located in PFAs.	Comments requested more points for projects in rural/small towns.	Revised to provide more of a balance in points.

4.2.4 (NEW) 4.3 Transit Oriented Development	Revised scoring to provide flexibility in rural/suburban areas.	Comments requested that point be equalized.	Revised point structure and changed language for clarity. Made TOD its own category
4.3.3 (NEW) 4.4.3 Family Housing	Restructured points to encourage more three (3) bedroom units.	Comments requested not such a drastic restructuring of points. Comments indicated marketing concerns for larger units.	Adjusted points, reduced 20% -3 bedroom units to 15% 3 bedroom units.
4.3.4 Elderly Housing in a Defined Planning Area	This section was created in the original draft to allocate points for elderly housing in a DPA.	No comments received.	Deleted this category. Captured in new Defined Planning Area Category.
4.4.5 Mixed Income Housing	Initially increased percentage of market rate units in projects.	Comments indicated that the new percentages are not feasible.	This section was reverted back to 2013 Guide language.
4.5.3 Construction or Rehabilitation Cost Incentives	No changes to this section in the original draft.	Comments and suggestions were made at a series of meetings with Construction Working Group to create better cost containment incentives in this section.	Revised point deduction structure based on the percentage above the median construction costs on a per square foot and number of bedrooms basis.
4.6 Development Quality Standards	Changes in this section of the Guide were pending in the February Draft.	Comments and suggestions were made at a series of meetings with Construction Working Group to create better cost containment incentives in this section.	This section has been revised for clarity.
LOAN PROCESSING PROCEDURES			
6.2 Processing Multifamily Bond Program Applications	No changes were made.	No comments received.	For taxable/tax exempt MBP Financing, all bonds must be outstanding for at least twenty-four (24) months.
APPENDICIES			
Appendix B + C	No changes.	No comments received.	See appendix B + C for slight changes in fees for application and processing.