

Frequently Asked Questions (FAQ) 2013 Qualified Allocation Plan

OHFA is often asked how it will interpret program guidelines with respect to specific issues. Such questions regarding the above noted guidelines can be submitted to 2013QAPMailbox@ohiohome.org

This FAQ will be updated weekly, as necessary, to address new questions that may arise.

August 20, 2012

Question: Does a new mark-to-market count as significant federal funding?

Answer: No. The QAP identifies which federal sources will be considered for competitive points.

Question: Which costs are included in calculating the contractor profit limit?

Answer: In addition to hard construction costs, OHFA will include all off site costs and improvements in calculating the contractor profit.

Question: If OHFA is going to conduct the Experience and Capacity review after the 2013 applications are submitted, how will applicants know what, if any, restrictions may be imposed?

Answer: OHFA will be evaluating the financial strength of the development as a whole, versus individual members. Therefore, that review will be conducted on every development team. However, anyone who has not partnered with OHFA on a recent project or has been denied in previous round due to organizational capacity should contact the agency to determine whether or not a review should be conducted in advance of the round.

Any member of a development team who was restricted in the past and plans to be part of an application that does not meet restrictions previously imposed, should also contact the agency in advance.

All requests should be submitted in writing to the attention of the Operations Manager. These must be received by Planning, Preservation and Development no later than 5:00 pm on November 30, 2012. Organizations that do not submit a request will still be eligible to submit an application; however, OHFA's decision as to the capacity of the team (both financial and organizational) will be final and may impact the project's ability to continue through the application review process.

August 27, 2012

Question: Is OHFA imposing per project allocation caps? Is OHFA limiting the amount of eligible basis a project may claim for the purposes of allocating credits?

Answer: No, OHFA is not imposing allocation caps, nor is it limiting the amount of eligible basis a project may claim for the purposes of allocating credits.

Question: With the application being due February, 21, 2013 do all of the support letters have to dated 2013 to be certain the Mayor, Trustees, Commissioners, etc. are current? What if they don't meet in January?

Answer: The letters should be dated as close to the application date as possible. If they are dated in 2012, the applicant should provide documentation Trustees or Commissioners did not meet in January or February of 2013. The individuals who sign support letters must hold their current position as of February 21, 2013. For example, a letter from a person who signs a support letter in 2012 and no longer is in the same office or position on February 21, 2013 would not qualify for points.

Question: HDAP Funding- does this funding have its own process/application? What are the details?

Answer: Requests for HDAP will be evaluated concurrent with the competitive credits. The Affordable Housing Funding Application (AHFA) has a worksheet for these seeking this funding source. OHFA has posted to its website guidelines for Housing Credit Gap Financing.

<http://www.ohiohome.org/hdap/HDAPguidelines.pdf>

September 3, 2012

Question: The developer would like to claim historic credits (State and Federal) and the equity those will bring. However, the project will not be on the Historic Register in time to meet the Proposal Submission Deadline. Is this important, since the process will be completed prior to the project's review by the OHFA Board?

Answer: If a project is seeking competitive points for the use of the State or Federal Historic Tax Credits, the applicant must demonstrate the project has completed the Part I review and received a recommendation for approval from the Ohio Historic Preservation Office. The final application must evidence all funding has been conditionally committed; therefore the applicant must have completed the process to be placed on the National Register and the credits must have been awarded. If the project is not successful in being placed on the National Register or in receiving State or Federal Historic Credits, OHFA will rescind the Binding Reservation Agreement. If the applicant is not seeking competitive points for State or Federal Historic Credits, no documentation is needed at the Proposal phase. However, the final application must evidence that all funding has been conditionally committed. Therefore either the applicant must have completed the process to be placed on the National Register and the credits must have been awarded or the applicant must provide conditional commitments for an alternate funding source.

Question: How should developers submit supporting documentation for the competitive points they are requesting?

Answer: All documentation submitted to support competitive scores must be numbered and labeled as described in the instruction worksheet found in the 2013 Affordable Housing Funding Application (AHFA). Since applicants will provide one PDF document for each scoring category,

multiple documents will need to be combined. Each section within the PDF must be bookmarked. The Self Scoring sheets have a section for the applicants to identify both the file name and page number for the supporting documentation that supports each competitive item.

Question: How will OHFA handle waiver requests?

Answer: OHFA has created an "Exception Request Form" applicants will be required to use to request an exception (waiver) to the QAP. This is available on the website under Program Documents, 2013 Qualified Allocation Plan. A separate form must be submitted for each exception being requested. Applicants are encouraged to provide any documentation they have that would lend support to the request.

OHFA has created the following mailbox where exceptions requests are to submitted:

ExceptionsPPD@ohiohome.org

OHFA will review all requests and release decisions on February 7, 2013.

September 10, 2012

Question: Page 62 of the 2013 QAP references an OHFA Management Company Capacity Review Survey. Please forward this survey to me for completion and inclusion in our application. I was unable to locate the document on OHFA's website.

Answer: Management companies with OHFA experience will be evaluated based on the criteria in the QAP and their history as documented by OHFA's Office of Program Compliance. OHFA may require additional information from these organizations, and will contact the applicant if necessary. Management companies that have not worked with OHFA in the past will be required to complete the OHFA Management Company Capacity Review Survey. This document is posted on OHFA's website here: <http://ohiohome.org/lihtc/documents.aspx>

Question: I'm not clear on the requirements under Community Outreach to achieve eight (8) points for existing rental units. We plan to meet with existing residents to provide opportunities for input and collaboration on our rehab plans. Does OHFA expect applicants to meet with community members outside of the resident population (and locally elected officials) to discuss the proposed rehab?

Answer: OHFA will consider opportunities provided to the residents of the units as "community" for points under Community Outreach. However, to gain the most points possible, OHFA also values the opportunity for the local government and safety services (police, fire, etc.) to provide input on improvements.

Question: Under Community Outreach, the guidelines suggest posting notices where residents may congregate. In this context does "residents" mean the occupants of the subject building or general members of the surrounding community?

Answer: It can mean both; however, OHFA will provide some points if the applicants provide opportunities to the residents alone (please see the previous question).

September 17, 2012

Question: For competitive points under the Local Collaboration category, specifically Support of Mayor or Trustees and Support of Village Council, a development located in a City or Village is able to achieve points in both these categories. However, if the development is located in a Township

the support for City or Village Council is unavailable as the development would not be in such jurisdiction. Or another way to look at it is the QAP favors developments in Cities and Villages over Townships as the QAP gives more points for the City and Village governing bodies over the Townships. We would not think that would have been staff's intention.

Answer: Each competitive category provides opportunities to earn more points than the maximum available. While a project located in Township may not be able to get the points for support of the City or Village Council, there are other opportunities for them to earn points beyond the maximum allowed.

Question: Local Collaboration, Community Outreach: Is the developer expected to have already conducted Community Outreach, describing the process at the time of application submission, or will points be awarded based on a plan described in the application, to be implemented later?

Answer: The QAP requires this to be completed prior to submitting an application.

Question: Can you please clarify the New Markets criteria for "previous development" on page 25 of the 2013 QAP. Does this include all OHFA multifamily program funds or only previous 9% projects?

Answer: This includes all programs administered by OHFA for the purposes of developing affordable rental housing.

Question: Is there a source documents or website (ie. www.ohiohousinglocator.org) that developers can use to identify all multifamily projects funded through OHFA?

Answer: OHFA will post a list of projects funded through OHFA on its website no later than October 1, 2012. This list will be located at: <http://www.ohiohome.org/lihtc/documents.aspx> The list will be located under the heading 2013 Qualified Allocation Plan, under Resources. *Update, a draft is posted to the website. The Office of Affordable Housing Research and Strategic Planning is working in partnership with Planning, Preservation, and Development to produce an accurate list of all multifamily projects. This list will be geocoded and viewable online. We expect to have the information available to the public by:*

Question: For Local Collaboration/Local Priority, how should applicants self-score this and what documentation should be provided to support the score?

Answer: Applicants should not self-score this category or provide documentation. The QAP states that OHFA will survey each applicable locality. OHFA will be contacting each locality, regardless of what is submitted with application, and OHFA will award these points.

September 24, 2012

Question: Since USDA Rural did not release a NOFA for the USDA 515 funding, will OHFA replace it with USDA 538 in order to obtain USDA point under significant federal or state funding?

Answer: No. Points will be awarded only for the specific funding sources identified.

Question: On page 26 of the QAP, it says, "Three (3) points will be awarded to proposals in which all sites involve the redevelopment of vacant and foreclosed properties in areas impacted by foreclosure." Is there a definition of "areas impacted by foreclosure" to know if an address qualifies?

Answer: OHFA will post a list of zip codes for areas considered to be “areas impacted by foreclosure.” This list will identify both OHFA’s methodology for determining these areas as well as the data source. OHFA is working to have this finalized for an October 16th posting date.

October 9, 2012

Question: What is OHFA’s definition of: innovative attributes”; “innovative housing,” and “innovative features”?

Answer: The QAP defines these as: “Concepts must be original ideas, able to serve as a model for future affordable housing developments, able to be replicated in any area of the state, and benefit the population to be served.” OHFA is currently evaluating how it will select among the proposals competing for these points, and hopes to be able to provide more guidance at the Housing Funding Training being held on October 30, 2012. Information from that training will be posted to the OHFA website after the training.

Question: Can you clarify what would be considered a “commitment for rental subsidy” as stated on page 12 of the QAP regarding the PSH Allocation Pool.

Answer: OHFA will accept a conditional commitment for rental subsidy for at least 50% of the units in a Permanent Supportive Housing application with the initial proposal. A firm commitment of rental subsidy must then be submitted by the final application deadline in order for the project to move forward. A letter from the housing authority that indicates support for your proposal and outlines the process for request and approval of PBV will be acceptable with the proposal submission.

October 15, 2012

Question: Is OHFA willing to consider waiver request for basis boost, particularly for projects located in census tracts that qualify for a 2012 QCT but not a 2013 QCT?

Answer: No

Question: Can you please clarify “executive body” on page 23 of the 2013 QAP. Would a plan adopted by the executive branch of a City government (ie. Mayor / Community Development Department) qualify for the points under the Local Development Plan category?

Answer: The ‘Executive Body’ is the group of government officials (typically elected) tasked with reviewing the needs of the municipality and planning to address those needs and empowered by the community to approve and implement a Local Development Plan. OHFA does not expect this responsibility to rest with one individual.

Question: Could you please direct to the link on the OHFA website of the list of the Statewide Accessibility Organizations as per the QAP requirements on page 60.

Answer: The statewide accessibility organizations can be found on the OHFA website at: <http://www.ohiohome.org/lihtc/accessibilityagencies.pdf>

October 29, 2012

Question: The QAP states that OHFA will evaluate the reasonableness of costs by comparing development budgets to various items, including the 2012 OHFA Cost Index. Is this Cost Index a cap on costs or is OHFA considering it to be an actual cap on costs?

Answer: OHFA considers the 2012 OHFA Cost Index to be one mechanism to evaluate the reasonableness of the development budget. Projects that exceed this must provide an explanation, and supporting documentation if appropriate, as to why OHFA should consider allowing the project to move forward. The explanation and supporting documentation should be in PDF format and placed in ‘#23 Exception Documentation’ on the Proposal Submission Disc.

Question: The QAP places a maximum on Construction Contingencies for both New Construction and Rehabilitation projects. Is this calculated on Hard Construction Items only or on the entire construction contract (total construction costs)?

Answer: This is found on page 65 of the 2013 QAP (#3 under E. Hard Construction Costs). OHFA located this particular cap under Hard Construction Costs to affirm that the Construction Contingency is calculated on Hard Construction Costs only, as defined in Section E.

November 5, 2012

Question: Proposal Summary: What type of information (# of units, location, type of development, ?) and how long should the summary be. Is there a word count limit on the summary?

Answer: The information in the narrative should not repeat any information found elsewhere in the summary. For example, the unit chart details the unit mix as well as the total number of units. Therefore, this information should not be included in the narrative. The applicants may provide as much information as can be easily read in the text box. The applicant should not change the font or font size in an effort to expand the narrative. More information will be provided on this document during the Webinars being held for the Affordable Housing Funding Training (November 13 and December 18, 2012)

Question: Market Study: Page 16 under Threshold Items indicates that a Market Study by an OHFA approved professional must be submitted with the application. However, OHFA also has in the timeline a Market Study commission deadline and a market study deadline, which are post application submission. Please clarify.

Answer: The Market Study is required for the Proposal Submission. However, OHFA does allow applicants to submit that after two weeks after the Proposal Submission Deadline provided the market studies have been commissioned by January 24, 2013.

Question: Statewide Accessible Organization Notification: In certain jurisdictions, there are multiple organizations that serve the area. Is it sufficient to inform at least one organization or is the applicant required to inform all organizations. Please clarify.

Answer: Page 60 of the QAP states that applicants are required to notify the appropriate statewide accessibility organization. The number of organizations notified will vary among the applications; however OHFA does expect applicants to notify all appropriate statewide accessibility organizations.

Question: Utility Allowance (UA) Information: Properties with project-based Section 8 rental assistance often have a lump sum UA based on the HUD Rent Schedule calculation specific for the property, which is different from the Section 8 UA for the local Public Housing Authority. How should this be addressed in the application for Housing Credits?

Answer: On the Budget worksheet in the AHFA, under Tenant-paid Utilities, indicate the lump sum amount in the Other row, and specify “HUD Rent Schedule” in the designated area. Submit an executed copy of the HUD Rent Schedule with your application.

Question: Item #32 on the Checklist (AHFA Instructions Page): What if anything else needs to be submitted with the market study?

Answer: Market Study Standards and the Market Study Index provide additional guidance. Both of these documents are found on the website under OHFA Standards.

(<http://www.ohiohome.org/lihtc/documents.aspx>)

Question: Please clarify when commitment letters must be submitted to OHFA. There seems to be a discrepancy between the Checklist (AHFA Instructions Page) and page 37 of the QAP.

Answer: Commitment letters are not required until the final application, unless the applicant is claiming competitive points. Applicants must provide supporting documentation for all competitive point categories with the Proposal Submission due February 21, 2013.

November 19, 2012

NOTICE: Error on the calendar in the 2013 QAP. The calendar indicates that May 3, 2013 is the last date OHFA will take into consideration comments from the public. The correct date is May 13, 2013.

Question: I assume “vacant *and* foreclosed” means a property must be both. True? If so, is there a definitional grey area surrounding the term ‘foreclosed’, where the nature and amount of judgment liens, etc., against a property for all intents and purposes signify that its reuse options are difficult and limited, and therefore it is as good as foreclosed?

Answer: Page 26 of the QAP states that, to earn the points for Vacant and Foreclosed Property Development, sites must be both vacant and foreclosed. Points will be awarded based on the number of sites that meet these criteria. Applicants must provide supporting documentation to evidence the criteria has been met.

Question: Would a land donation count for points in the financial leveraging section? For example, if the land was donated to the project and we had an appraisal stating the value of the land, could we count the value of that land into the leveraging section?

Answer: Yes, however the applicant will be required to submit as as-is appraisal that meet’s OHFA requirements with the proposal application.

Question: Karen mentioned early in the presentation –regarding the “exception request” – stating “one per project. I think she meant “one item per request”. As I understood it last week – you might have two items – but that they need to be on separate paperwork. Today’s comment sounded more like we are only allowed one request per project.

Answer: Applicants may submit multiple exception requests for a project; however, each request must be submitted on a separate Exception Request Form.

Question: Is there any scoring preference for Section 8 Preservation deals within the existing unit's pool? Would two exactly similar deals score the same with one having a Section 8 HAP for 100% of the units and the other committing to the "Extremely Low Income Housing" use and rent restrictions for a 10% of the units in a PJ and 5% in a non-PJ?

Answer: No, however page 29 of the 2013 QAP states that points will be awarded to projects identified by HUD and RD as being primary and secondary priority projects.

Question: FF&E is included in Hard Construction Costs –does this include only FF&E that the contractor purchases and installs/sets up, or this *plus* FF&E that the owner/developer purchases and installs/sets up?

Answer: OHFA will include all FF&E in Hard Construction Costs. Developers must be sure to clearly identify and separate these costs from other development costs if they are in the "Other" category in the project's development budget.

Question: While hard cost contingency is not included in the definition of Hard Construction Costs, it is not clear whether soft cost contingency is included in the sum total of soft costs which its percentage is multiplied against. Is the 2.5% limitation 2.5% of all soft costs except soft cost contingency, or is it included in the sum it is in turn calculated from such that the amount is an approximate approach to 2.5% limitation?

Answer: The soft is calculated on the total soft costs exclusive of the 2.5% contingency.

Question: Please describe in more detail what constitutes a developer asset management fee – does this mean a capitalized fee? It is not unusual for a General Partner or Limited Partner Owner to derive an annual asset management fee in a project's operations cash flow waterfall.

Answer: This could be a capitalized fee. OHFA does anticipate that the Limited Partner will charge the project an asset management fee. General Partners/developers may not add an additional asset management fee.

Question: Please describe in more detail what constitutes a financing fee charged by a developer. Does this include interest on advances made by a developer to cover the cost of predevelopment work prior to closing of construction financing?

Answer: Any fee charged by the developer, an affiliate of the developer or any related party to secure or provide financing for the project.

Question: Will OHFA accept updated Market Studies and Phase I's or will projects be required to commission new studies?

Answer: Per the Market Study Standards on page 3, "The study must have been completed or updated by the author within one year prior to the application deadline."

Per the Phase I Standards on page 3, "Note that Phase I ESAs must have been prepared within 6 months of funding notification from OHFA in order to be valid. If reports are older than 6 months, a Phase I ESA update will be required. Phase I ESA updates may be provided as addendums to the original report and must contain the following, at a minimum: Updated regulatory database search, Updated environmental lien search, Updated site visit, Updated interviews, and Updated environmental professional's statement (ASTM 12.13) and REC statement (12.8) "

November 26, 2012

Question: Can a project count the total sum of tax abatement towards the leveraging points?

Answer: No. The points awarded under Economic Characteristics (Page 27 of the QAP) for leveraging non-OHFA resources are for development costs. Tax abatements would serve to benefit the project operating expenses.

Question: Can a project create a new Community Housing Development Organization (CHDO) for the 2013 LIHTC Round? First question is how does an agency get certified as a CHDO? If we were to proceed with establishing a CHDO as a part of the project would that qualify in the QAP as having one participate? In our opinion would this qualify for "Innovative Housing" points in the scoring? Thank you for your time helping us with these questions.

Answer: OHFA certifies CHDO only once each year. If they have not yet been certified, they would not be eligible to participate in a 2013 Competitive LIHTC project as a State-Certified CHDO.

Question: Exceptions for mandatory Neighborhood and Location Fabric (Section 2) criteria (see pages 23 to 41 in the Green Communities Criteria) are due January 17 with supporting documentation. Please follow the OHFA submission process for exception requests. Decisions regarding the Section 2 exceptions will be issued by OHFA by **February 7, 2013**. All other exception requests will be reviewed upon submission of the OHFA Green Communities Workbook. We were under the impression OHFA was making the final decision on exceptions INCLUDING the green criteria. Should Exception Requests be sent to OHFA as well as Enterprise?

Answer: All exception requests should be submitted to OHFA using the form available on our website. OHFA will work in collaboration with Enterprise in arriving at a decision. Applicants should not also send a request to Enterprise.

Question: How does one determine if a site is located in a "Participating Jurisdiction" (PJ) Area?

Answer: This information is available on HUD's Website at:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordablehousing/programs/home/contacts

Because HUD updates these, developers should refer to this website for the most current information. The local government (city and county) may also be able to provide guidance on this.

Question: Where does one find a list of OHFA approved Market Study Professionals? We have already completed a market study, but want to be certain that the author is approved.

Answer: This information is available on OHFA's website.

December 10, 2012

Question: I was curious as to what tax credit equity rate you are currently using? Is it \$0.90/credit or lower/higher?

Answer: OHFA will evaluate the equity commitment according to the Affordable Housing Underwriting Guidelines in the 2013 QAP, and may require adjustments to pricing based on comparable, historical, and/or current market conditions and trends.

Question: Proposals to rehabilitate existing units often have a few residents who are over the income limits for the tax credit program at the time of proposal, but who may no longer be living at the property when the rehabilitation is complete. When does OHFA want to know about potential over-income residents?

Answer: This information should be disclosed to OHFA when the proposal application is submitted, including:

- Whether any over-income households currently reside at the property;
- The number of low-income and market-rate units intended to be at the property when rehabilitation is complete; and
- A plan to address any over-income units that are intended to be low-income units, such as relocating residents or forgoing credits on these units while the over-income households are in place.

Question: There is a large piece of land and we are going to receive a portion of it as a donation for this first phase of development. Does the appraisal have to be on that specific piece that we identify or can it be for the total piece of property, and then we can apply it on a net basis?

For example:

The land is 10 acres

The appraisal for the total 10 acres is \$1MM

We are donated 5 of the 10 acres

Therefore, the land donation amount is \$500,000

Answer: Please review the OHFA Appraisal Scope and Guidelines, "*Excess Land Acquisition. Where more land is being acquired than proposed, and the remaining acreage is not being utilized as permanent green space per deed restrictions or covenants, the As-Is value will be prorated. Excess land should not attribute value to the proposed property. A project that has excess land must show a separate value for the excess land and it cannot be purchased as part of the primary project cost.*"

Question: Is the Proposal Summary a stand-alone document, or is it the sheet that is located in the AHFA?

Answer: The Proposal Summary is a sheet in the AHFA. This sheet will be printed to Adobe PDF and posted on the OHFA website a few business days after OHFA received your proposal application.

January 7, 2013

Question: (a) On the New Units Self Scoring tab the amounts under maximum Cell C60 do not seem to match the QAP page 31 & 32. Local Collaboration should be 35, Project Characteristics should be 30, Economic should be 20, Market should be 15. **(b)** When updates to the AHFA come out is there an easy way that the ones that are already being filled in can be fixed. Filling out new AHFAs because they have errors takes a lot of time.

Answer: (a) The Summary at the bottom of the New Units Self Scoring Tab is incorrect. **(b)** Any correction(s) to the AHFA that do not affect cash flow will be applied when the applications are received. Known issues will be published at the end of this FAQ. We will post corrected AHFA's to the website for applicants who have not started filling out information and for applicants who wish to transfer the information into the corrected AHFA.

Question: (a) According to the QAP, OHFA will give points to projects that utilize *federal* historic tax credits. The FAQ seems to expand what proposals that use both federal and state historic tax credits are required to submit at initial application, as it states the applicant must “demonstrate the project has completed the Part I review and received a recommendation for approval from the Ohio Historic Preservation Office.” Is it OHFA’s intent to have two separate standards for projects that use Federal Historic Credits only and for projects that use both Federal and State Historic Credits? Will projects that utilize both State and Federal Historic Credits get more points than projects that only use Federal Historic, since OHFA is requiring that state and federal projects go through both processes?

(b) In regards to the FAQ statement that the applicant provide a recommendation for approval from the Ohio Historic Preservation Office. Does this mean that an applicant that plans to utilize both Federal and State Historic Credits:

- i. Needs to have applied for the State Historic Credits before February 21 and received an recommendation letter from OHPO?
- ii. Or, can the development team satisfy OHFA’s requirement by obtaining a letter from OHPO that documents that a Pre-Development Meeting has occurred and that OHPO believes that the project is eligible to apply for State Historic Credits in a future round-similar to Conditional Funding Commitment Letters?

(c) For federal historic projects that are already listed on the National Register of Historic Buildings, what does the applicant need to submit at the proposal stage for points? For the same scenario, what is needed at proposal stage for initial underwriting?

(d) For projects in the final application submission, what is needed to document the approval of our proposed Amendment to the property’s Part II Approval?

Answer: (a) Projects with State Historic Tax Credits and Federal Historic Tax Credits are eligible for competitive points under significant Federal or State Funding category, points are dependent on the % of total development costs that are funded from state or federal resources as listed on page 26 of the QAP.

Projects with Federal Historic Tax Credits are eligible for competitive points under the Historic Tax Credits category.

(b-d) Please refer to the FAQ posted on September 3, 2012. Projects must have an allocation of credits at proposal to be eligible for points.

Question: Which of the Enterprise Green Communities documentation must be submitted on or before Feb 21 and what would be submitted with the final application on Aug 29?

Answer: Please refer to the “Green Communities Submission Process” on the OHFA web site for guidance on this process.

Question: Has OHFA considered the cost of energy testing and HERS Rating and permitting the funding of such to be outside of basis?

Answer: These items need to be listed in the Other category in the Development Budget and will be counted as professional fees.

Question: How would OHFA prefer to receive lists of projects since 2007 since when the information will not fit in the space provided in the AHFA? Should we only include Ohio developments?

Answer: Please insert additional sheets into the AHFA and list all developments in chronological order from newest to oldest. Please include all developments in the United States.

January 14, 2013

Question: Can you receive new market points for a single family lease purchase development if the PMA already has existing multi-family tax credits?

Answer: No

Question: Are Single Family lease purchase projects viewed as the same or different product than multi-family?

Answer: Single family lease purchase projects are considered to be family units for the purpose of the New Markets category.

Question: Can the applicant elect to compete in the Existing Rental Units Pool despite its past and future participation in providing PSH housing within the local Continuum of Care? Is this a question that could be addressed via an Exception request?

Answer: Projects that provide permanent supportive housing will compete in the PSH Pool.

Question: The city is donating land to a project to count as leverage. The piece of land will be used for two phases and two separate projects. The first phase will be seeking funding in the 2013 LIHTC round. The amount of leverage will be based on the land being used and the appraisal for that piece of the land. When the second phase comes into OHFA for funding, will the remaining donated part of the land still be counted as leverage?

Answer: Scoring categories and points change from year to year in the Qualified Allocation Plan. This cannot be determined as it is dependent on the requirements of a future Qualified Allocation Plan.

Question: I am struggling to determine whether the PSH project requires a Utility Allowance exception and whether that is a Threshold exception or an Underwriting exception under the 2013 QAP? The new construction PSH proposed will be LEED certified, which will be lower utility costs than on the Section 8 utility allowance chart. In addition for PSH, there is no utility allowance as tenants do not pay separate utilities since the utilities are part of the total rent. Under this scenario do we include the section 8 Utility Allowances in the AHFA table understanding that they don't apply? Or do we need to submit an exception for the non-applicability of the Utility Allowance?

Answer: Exception requests for Utility allowances are not permitted as they are governed by Section 42. Utility allowance documentation is not required when all utilities are paid by the owner, however during underwriting; analysts may request documentation for any operating costs that are outside normal variances. Please refer to Treasury Regulation 1.42-10 and the OHFA Utility Allowance Policies and Procedures on the website.

Question: Is the Statewide Accessibility list provided accurate and up to date?

Answer: Under Review

Question: We are an experienced tax credit developer from out of state. We went through the pre-qualification process last year and was approved to submit one application however we chose not to submit last year. From my understanding this year this pre-qualification process has been eliminated. With that being said, is there anything you require from first time applicants that I should be aware of?

Answer: Please review the answer to the third question listed under August 20, 2012.

Question: We have a scattered-site rehab deal that consists of a multi-family building, townhome apartments and quads in several locations. Would this qualify as scattered-site in terms of MP-1 eligibility?

Answer: pg. 16, QAP A project qualifies as scattered-site if there are 10 or more sites AND no more than 50 percent (50%) of the sites are contiguous.

Question: When comparing costs to the OHFA 2013 Cost Index, there are 3 columns. Is this a comparison to only hard costs or is it to total development costs, including soft costs, reserves and fees? The project we are proposing has a majority of 1 BR units, which seem to be within the per unit cost, but due to the high proportion of 1 BR's vs. 2 BR's, it doesn't seem like it would fit in with the per BR cost unless it is calculated as 190k per unit + 110k per extra BR above the 1st bedroom.

Answer: The cost index is based on total development costs. To compare to the per bedroom unit, use the following calculation: Total cost divided by the total number of bedrooms in the project.

Question: Will OHFA consider exceptions for competitive criteria?

Answer: No

January 17, 2013

Question: Where can I find a list of State Certified CHDO's? What documentation is needed for this section of the application?

Answer: A list of State Certified CHDO's for 2012-2013 can be found on the website here: <http://www.ohiohome.org/chdo/default.aspx>. The applicant should submit evidence that appropriate communication and a "good faith" demonstration of the proposal has occurred as referenced on page 19 of the QAP. There are multiple CHDO's for some areas, it is necessary to communicate with all CHDO's serving the area where your project is proposed.

Question: Will a letter of support from the Development Director be accepted as an alternative to a letter of resolution of support from the majority of the County Commissioners?

Answer: No

Question: Why was the Other category removed on the Exception Request form?

Answer: This was done to avoid confusion as to what exceptions could be requested. The categories for which we allow exceptions are mirrored from the Qualified Allocation Plan. *Note: the availability of exceptions [indicated at the top of Page 57](#) applies to item C. "Single family home market optional items" [at the bottom](#) of page 56, as opposed to [item D. Bathrooms](#) on page 57.*

Question: How should we handle the back-up attachments for an exception request? Should we attach them directly to the Exception Request Form (i.e. one file) or should we label them as attachments, and if so, with what naming convention do you prefer?

Answer: Send the exception and any supporting documentation together as one document.

Question: The New Units Self Scoring section of the AHFA has changed in the local collaboration section and now the total possible points are 95 instead of 100. Did OHFA decide to eliminate the 5 points for Local Priority of mayor or trustees?

Answer: All of the competitive scoring categories indicated in the QAP continue to be part of the selection process. The AHFA currently posted to our web site permits a self-score of up to 100 points in the New Rental Units Pool.

Question: For new construction (on a vacant parcel), does a Project History Narrative have to be furnished?

Answer: No, this is referenced on pg. 54-55 of the QAP and only applies to rehabilitation developments.

January 28, 2013

Question: Is item #5 Organizational Chart in the AHFA checklist to be submitted for only the development team members as shown in the Development Team Review tab of the AHFA or should it also include information on the contractor, architect, engineer, legal, and tax attorney as shown in the Project Information tab of the AHFA?

Answer: The Organizational Chart should include the Ownership, and the Developer.

Question: What is OHFA's process for arriving at a score for Market Quality?

Answer: OHFA will combine results from the site visit and the market study to produce scores for Market Quality.

Question: What is the process for correcting errors to scores?

Answer: OHFA will release scores to applicants approximately three weeks prior to public release and applicants will have one week to provide feedback. OHFA will provide additional instructions for corrections when scores are released to the applicant.

February 4, 2013

Question: Which rent limits are used to calculate maximum gross rents in the 2013 AHFA?

Answer: The HUD Rent Limits from 2012 are in the 2013 AHFA; however applicants must use the 2013 HUD Rent Limits to determine their rent. Staff will utilize 2013 rents during analysis. Data tables in the application that will be used for final applications will be updated to the most current rents.

Question: We have rents at Low HOME that don't translate into the 30%, 40%, 50% 60%, etc AMI categories. How would you like us to fill out the unit mix on the budget tab? I don't have an AMI

designation for the low home rent, and as a result, the formulas in column N rows 10-29 won't calculate a max gross rent.

Answer: The maximum gross rent is a reference point; applicants should refer to the 2013 rent limits as they were not available when the AHFA was released. Rents should be listed as what will actually be charged based on the specific funding requirements for your project.

Question: Our application will be in a city where there is a City Manager AND a Mayor; the Mayor's role is ceremonial only – for the Local Priority points, does a letter from the City Manager indicating the development is a priority sufficient, or does the letter have to come from the Mayor?

Answer: The letter must be from the Mayor.

Question: In the Support of Mayor or Township Trustees, a differentiation is made “...if the municipality does not have a Mayor.” Does a letter from a City Manager meet this requirement where a Mayor exists, but has no governing authority?

Answer: No, the letter must be from the Mayor.

Question: On the instructions tab of the AHFA, the following are listed and being required for the site visit folder: a) Two contacts, their cell phone numbers, a list of the members of the development team and CHDO status; b) A copy of the narrative description of the project; c) One MapQuest-type map showing the location and address or crossroads
d) A site plan and all building elevations. Is there some guidance about what should be included in the narrative?

Answer: A printed copy of the Proposal Summary from the AHFA is acceptable.

Question: The 2013 OHFA Cost Index is divided into New Construction A, B, and C. Will you please clarify what geographic areas are within A, B and C so we can confirm cost limits for our projects?

Answer: Please see page 14 of the QAP, Urban =A, Suburban =B, Rural= C.

Question: Where can I find a list of Participating Jurisdictions?

Answer: HUD has a list of PJs available at

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordablehousing/programs/home/contacts.

Question: Are Developer Fees and Consultant Fees included in new construction eligible basis when calculating Developer Fee, or is this new construction basis excluding Developer Fee?

Answer: Developer fees and consultant fees are included in new construction eligible basis when calculating the developer fee percentage.

Question: Are Construction and Permanent Lender Legal Fees and 3rd Party Reports considered “Professional Soft Costs”?

Answer: Construction and permanent lender legal fees and third party reports are considered as Professional Soft Costs.

Question: What is the maximum amount of LIHTC that will be awarded to a project? Is this amount determined by a formula?

Answer: Please refer to the Housing Credit tab in the AHFA for credit calculations. There is not a maximum LIHTC limit.

Question: How will OHFA determine market quality score?

Answer: The market quality score will be determined by OHFA staff. Applicants should provide any supporting documentation that explains the self-score indicated in the AHFA. While OHFA will reference market studies for statistical data, this score will not come solely from the market study or market analyst. For example, for areas impacted by disaster, the applicant should indicate in their narrative the disaster and impact to housing in that market.

Question: For the recycled TCAP bridge loan product available to PSH proposals, will OHFA treat the difference in equity generated by a bridge loan as an OHFA resource for purposes of determining competitive points associated with the leveraging of non-OHFA resources?

Answer: No, OHFA will not consider equity raised by Bridge Loans funded by OHFA.

Question: What qualifies for points under Local Service Agencies Participation?

Answer: Coordination is a required part of meeting threshold. To qualify for points, the local agency must be a provider of services, not a referral program that links residents to the provider. Applicants must be able to describe why the services are comprehensive.

February 11, 2013

Question: For the “Significant Private or Public Investment” points, can the investments be located on-site or do they have to be off-site within a quarter-mile?

Answer: On and off site investments will be considered as long as they are within the quarter mile radius. On site investments cannot be included in the development budget.

Question: What and how should an applicant enter information on ‘Type of Site Control’ if it is a resolution from the city council involving a land bank as per the QAP? There are only four options, D, O, P and L. Which should be selected?

Answer: Please list this as an Option (O) and indicate in the site control submission that this is a land bank property and include the resolution(s).

Question: The AHFA calls for a relocation plan but there is not a checklist item number for that. What file name would you like it labeled as in the application.

Answer: Please include this as a separate paragraph, clearly labeled as the Relocation Plan in the project history narrative (Item 14)

Question: While the additional equity raised from the Bridge Loan will not be considered an “OHFA resource,” would it be treated any different than the other equity? Would the additional equity count as part of the leverage?

Answer: Equity will not be counted towards leveraging non-OHFA resources.

Question: If you have a mixed income project, for the Extremely Low Income points, does the 10% (or 5%) of units at 30% AMI apply to the total units or just the low income units/rent restricted units?

With respect the additional rent restrictions, can the units restricted at 30% AMI count towards the number of units that you have to restrict to 50% AMI under Additional Rent Restrictions? It appears that the percentage of 50% AMI restricted units is applied to only the low income/rent restricted units – as opposed to the total units.

An example to illustrate the questions: An application contains 100 units of which 80 units are rent restricted and 20 units are market rate and is located in an Urban PJ. Will 8 units or 10 units have to be at restricted at 30% AMI to maximize the Extremely Low Income points? It seems like 48 units will have to be at 50% AMI or less to meet the Additional Rent Restriction requirement. Please confirm or correct. Assuming a 48 unit total is correct, will the 8 or 10 units at 30% AMI have to be in addition to the 48 units or can the 8 or 10 units count towards the 48 units?

Answer: On page 38 of the QAP it is stated that the rent restrictions must be at or below 50%.

Question: For the statewide accessibility organization notification, I just wanted to verify that the only requirements for their letter is what is written in that section of the QAP. I want to be sure their letter does not have to meet the same template as the Public Notification letters.

Answer: The minimum of what should be provided is listed in the QAP. See page 60 of the QAP.

Question: How does OHFA intend to document the calls to local officials regarding priority of projects?

Answer: Phone calls will not be made. OHFA will send a priority survey to the city officials and carbon copy the contact person listed in the AHFA. If there is no response to the letter, OHFA will interpret this to mean that the city does not wish to state a priority.

Question: Could OHFA outline 'PHA Funding' Adjustment under the OHFA Cost Index? In particular, if funding under Section 8 Project Based Voucher HAP Contract from a PHA is part of the consideration for cost adjustment.

Answer: PHA Funding in the Cost Index refers to development subsidy as opposed to rental subsidy.

Question: We are proposing the adaptive re-use of a former school in Cincinnati. Should I use the new construction contingency of 5% or rehab construction contingency of 10%?

Answer: The underwriting standard for construction contingency for adaptive reuse will be the same as rehabilitation.

Question: For developments that include both new construction and rehabilitation which cost index will be used?

Answer: These developments will compete in the new units pool and the cost index for new construction will be used.

February 15, 2013

Question: The AHFA states: “If the total annual operating expenses do not meet OHFA requirements as stated in the Qualified Allocation Plan, please explain why.” (Budget worksheet cell B175). The operating expense requirements are not apparent in the QAP. Please provide.
Answer: OHFA operating expenses are not yet available. We expect these will be available prior to final application. It is acceptable to note that in cell B175 on the Budget sheet in the AHFA.

Question: In the Housing Credit tab of the AHFA, there is no direct method for identifying a credit ask that is less than the “requested” amount the formulae generate in cases where an applicant would need less. However, by putting a negative value in the Additional Basis Requested cells, one can manipulate the Total Adjusted Eligible Basis amount generated, and arrive at the applicant’s real credit request. Is this method acceptable, or is there another way to arrive at a true credit request amount that the Agency would prefer applicants follow?
Answer: This method is acceptable as described.

Question: If a MHA has a wholly owned subsidiary that owns and develops projects, will that qualify for MHA points?
Answer: Yes

Question: Based on FAQ issued on November 5th regarding commitment letters for competitive criteria, does OHFA want commitment letters for all non-OHFA resources included in the leverage score?
Answer: No. OHFA only wants commitment letters for other competitive criteria, specifically the Significant Federal or State Funding criteria.

Question: Will a vacant property acquired from a Land Bank meet the definition of foreclosure on page 26 of the QAP if conveyed through a deed in lieu of foreclosure in the chain of title?
Answer: Yes

Questions answered within the 2013 Qualified Allocation Plan:

How does OHFA define under Market Quality Score “Minimal Impact on Existing LIHTC Projects”?
Page 28 of the QAP

The OHFA Cost Index for 2013 Qualified Allocation Plan establishes limits on a Cost per Unit, Cost per Bedroom and Cost per Gross Residential Square Foot Basis. I cannot find a reference that says if this is hard construction or total development costs. What is the definition of the costs included in the published limits? If the building is a mixed-use building or has higher than typical quantity and/or quality of community/social service spaces does the cost of providing them fall within these limits? *Page 20 of the QAP*

Can you please let me know what date the 2013 multifamily tax credits will be awarded?
Page 11 of the QAP

Does the basis boost for high income census tracts apply to 4% non-competitive LIHTC applications, or only to 9% competitive LIHTC applications? *Pg. 63-64 of the QAP*

Last year we submitted applications without the check and then OHFA determined the fee to be assessed to each application. Is that happening again this year or should the applicant just decide which fee they are going to assess to each application? *Pg. 15 of the QAP*

Typically, we submit an application to be qualified to be a non-profit partner or management agent on our own. This year, our organization may partner with another agency to build LIHTC homes. Will we need to submit our own application to be a non-profit partner/management agent or will being a partner in their application suffice? *A separate Experience & Capacity application is no longer required for the Housing Credit program. Submit information about your development team with the proposal application as described on Pages 61-62 of the 2013 QAP.*

Cuyahoga County is governed by a Council under the leadership of a single County Executive. The QAP awards points for a resolution of support passed by a County Council, or a statement of support signed by a majority of County Councilmembers. I've been told that the Agency also will accept –and award full points for—a statement of support from the County Executive. Please verify. *That statement is incorrect. The QAP states that Points will be awarded for a letter or resolution of support from a majority of the City or Village Councilmembers for proposals located in a municipality. Pg. 24*

What content does the Agency require to be presented in letters to CHDOs in whose service areas a site for a proposal exists? *Please review page 19 of the QAP.*

Under Economic Characteristics "Leveraging Non-OHFA Resources", it indicates that points will be awarded to projects that leverage Non-OHFA resources. Would deferred developer fee would be considered a resource leveraged for purpose of these points?
Please see page 27 of the QAP.

The Project Characteristics on page 25 of the QAP discuss scoring points for having a minimum percentage of units affordable at 30% of AMI. I would like to make sure that the 6 competitive points are for having units at 30% of AMI, and not 35%, because the Housing Credit tab of the AHFA has sections which refer to affordability at 35% of AMI which seems to be for the HDAP program. *Please review page 25 of the QAP.*

Questions answered from the Housing Funding Training:

Question: Can an underwriting waiver be submitted prior to application?

Answer: An underwriting waiver may only be submitted with the proposal application.

Question: New Projects do not need an Affirmative Housing Plan until PIS? What is to be submitted as part of the application?

Answer: The Affirmative Housing Plan must be submitted with the final application.

Question: Is appraisal required at initial application?

Answer: The appraisal is required with the final application.

Question: Please define "excessive cash flow"

Answer: Projects that exceed an average hard DCR of 1.5 over the 15 year compliance period.

Question: Who do we contact to schedule an experience and capacity review before November 30th?

Answer: Karen Banyai at kbanyai@ohiohome.org or 614-752-4185.

Question: Proposal summary was cute, but not clear as to what is required in the narrative? Can OHFA be specific?

Answer: The majority of the information links from the AHFA with the exception of the picture and the narrative. Please review the FAQ posted on the OHFA website.

Question: We understand the equity increase or decrease concern; however proposal has an equity letter of intent and final app a letter of commitment due to the time lag. How will we know what OHFA's view is on what is "market"?

Answer: OHFA will evaluate the equity commitment according to the Affordable Housing Underwriting Guidelines in the 2013 QAP, and may require adjustments to pricing based on comparable, historical, and/or current market conditions and trends.

Question: Re: Outreach: it's hard to understand the difference between "Effective" and "Comprehensive" plans. Can you provide examples?

Answer: An example of an effective plan is one that communicates the housing proposal as described in the Community Outreach section of the QAP. An example of a comprehensive plan is one that includes engaging the community as part of the plan, giving them the opportunity to have input into the design and siting of the development, and involving residents, area business owners, and local government and safety services in the process.

Question: If only one project in a locality does the project automatically qualify for the priority point?

Answer: No. The project must be indicated by the local municipality as a local priority.

Question: Could you share the examples of the Innovation based on the recent HDAP awards?

Answer: Please submit a Public Records Request for this portion of recent HDAP applications if you would like to view examples of what was submitted for this category.

Question: If you are in a big city metropolitan area but the project is outside that city, will OHFA survey the municipality in which the project is located or the city which includes the area in its metropolitan area?

Answer: The local municipality in which the project is located.

Question: If it is the only project in the municipality, why would the applicant not receive the point?

Answer: The applicable representative of the local government must identify the project as a priority for development to receive points in this category. *The local government may have housing priorities which do not involve OHFA funding.- Updated December 17, 2012*

Question: How are we supposed to document investments within 1/4 of a mile of the site?

Answer: OHFA is flexible in how you document this scoring criterion, but the source must be verified and provide adequate detail. i.e. a letter from the local engineer or other appropriate official. OHFA may also verify investments during site visits.

Question: FAQ indicates what not to provide as opposed to what to provide and that more will be provided as part of the webinar.

Answer: As far as the narrative component of the proposal summary is concerned, OHFA wants to leave flexibility to the development teams. You should indicate what the project is and any other information that you want the public to know about your project.

Question: Will there be additional guidance for market criteria scoring? When will it be available?

Answer: We will not issue additional guidance for the Market Quality Score category. Please refer to page 28 of the 2013 QAP for information regarding this category.

Question: There are several state HUD offices, which would be contacted for priority scoring?

Answer: OHFA has planned a meeting with HUD to determine the proper contact(s) for these scoring categories.

Question: Does land donation count as a leveraged Non-OHFA source? If so, how will that be evaluated?

Answer: We are currently addressing this and the answer will be reflected in the FAQ. (Already answered on November 19, see Page 7 of the FAQ.)

Question: Are you going to make this webinar available for viewing in an archive version on your website?

Answer: The presentation is posted to the website.

Question: Should we underwrite for the 9% rate or the floating rate?

Answer: ~~Please underwrite your project using the floating rate for the month in which the application is submitted.~~ *Updated January 15, 2013: In January, the U.S. Congress changed the 9 percent credit rate to apply to credit allocations made before January 1, 2014.*

With the change in the 9 percent credit rate, applicants can now use the 9 percent rate to estimate their 2013 Housing Tax Credit amount.

Question: Will OHFA accept a third party utility estimate?

Answer: The OHFA Utility Allowance Guidelines describe how owners of tax credit projects should implement final regulation 1.42-10. The Guidelines can be found here:

<http://www.ohiohome.org/compliance/utilityallowance.aspx> options available include the

calculation of an Energy Consumption Model calculated by a properly licensed engineer or qualified professional.

AHFA – Known Issues & Notes

Date	Issue
12/26/2012	The Competitive Score Summary for New Units is inconsistent with the QAP
12/27/2012	Corrected Local Collaboration Subtotals for all scoring sheets in the AHFA
01/07/2013	Corrected Cells A70-A71 on the Cash Flow Evaluation Tab of the AHFA. This affects cash flow for proposals where applicants are deferring developer fee or requesting HDAP. The blank AHFA has been updated on the website for applicants who have not started filling out information or wishes to transfer the information into the corrected AHFA. Applicants who are deferring developer fee or requesting HDAP who would like a correction, please email the AHFA to kberry@ohiohome.org .
1/11/2013	Corrected the New Units Self Scoring Tab, Cell F26 Formula reference
1/28/2013	Cell G128 on the UW Review Worksheet formula was corrected, sheet was hidden and the color code on the tab was updated
2/4/2013	Note: Rents should be calculated based on 2013 limits, which were not available when the AHFA was released
2/6/2013	Existing Units scoring sheets, maximum for cell F24 Corrected to 25
2/15/2013	Note: On the Development Team Review Sheet, the question and answer in rows 113-114 are not required.