

2020 Q&A Posting #2

March 26, 2020

QAP Threshold – 7 Environmental Requirements

1. The 2020 QAP under Threshold, Section VII.B.2. stipulates that there are “additional environmental requirements for HOME/HUD-funded projects, including but not limited to PBRA.” Our question is whether or not the allocation of a local PHA’s Section 8 Project Based Vouchers (PBV) qualifies as “PBRA” and therefore triggers the submission to DCA of the 2020 HOME/HUD Environmental Questionnaire. The PHA’s allocation of PBVs will be the only HUD involvement in the project. To help with DCA’s analysis, we note that per the Section 8 PBV regulations the local governmental entity is the RE. We’ve found no other guidance to this specific question in the 2020 Environmental Manual.

➤ **DCA Response:**

The 2020 Environmental Manual (page 3 of 50) states:

“For projects which request HOME funds or list other HUD funding sources, including but not limited to Project Based Rental Assistance (“PBRA”), the Environmental Professional (see Section A(3)(a) below) must complete the HOME and HUD Environmental Questionnaire.”

2. My environmental consultant says I need to provide information on the “Responsible Entity” (RE) if 24 CFR Part 58 applies. Is DCA the only RE for HUD funding in the state?

➤ **DCA Response:** No. DCA is only the Responsible Entity (RE) for state-funded HUD HOME funds, NHTF funds, and CDBG funds. There are a number of other cities and counties within the State of Georgia that also receive HUD funds directly from the federal government such as the City of Augusta, and those cities and counties would be the Responsible Entities for their HUD funds.

QAP Threshold – 26 Integrated Supportive Housing

The 2020 QAP under Threshold, Section XXVI states that “applicants utilizing non-DCA PBRA must receive DCA approval prior to the Application Submission deadline. Applicants must submit documentation for their proposed PBRA funding source to hfdround@dca.ga.gov on or before May 13th, 2020.” We expect to receive an allocation of Section 8 Project Based Vouchers from a local PHA and we have some questions regarding this new requirement:

What information is DCA specifically looking for?

Will DCA provide a submission form to help Applicants respond?

If we submit information by a certain date could we expect to receive DCA’s approval prior to our application submission?

➤ **DCA Response:** Applicants utilizing non-DCA resources must provide evidence from the funding provider that the PBRA units set aside to meet the requirements under this section

target individuals with disabilities. It is also recommended but not required to submit the proposed unit mix. DCA will not be providing a separate form for submission of this information. Applicants can include the proposed unit mix in the project narrative.

QAP Scoring – 3 Desirables/Undesirables

Is the Traditional Town Square option only available to rural communities?

➤ **DCA Response:** Yes. Per the 2020 QAP, "Traditional town square which includes an operational anchor institution (e.g. county courthouse, city hall) and which serves as a hub for both commercial activity and community events (only applicable to Rural properties)."

QAP Scoring - 5 Enriched Property Services

In 2019, there was much back-and-forth regarding the estimated cost of services under Enriched Property Services, despite the fact that applicants provided acceptable assurances that services could be paid for either by the owner or the property. Will assurance that the owner will pay for services be sufficient for 2020?

➤ **DCA Response:** For underwriting purposes DCA needs to see an estimated cost of services. Per the minimum documentation requirements for Enriched Property Services, applicants seeking points under this section must provide an "estimated budgeted cost of operating service(s) on an annual basis."

QAP Scoring - 7 Revitalization/Redevelopment Plans

Please clarify how points are determined for revitalization plans.

➤ **DCA Response:** If you are missing *any* of the "primary criteria," you will not receive any points. You need to meet one "additional CRP criteria" to receive 1 point. Two "additional CRP criteria" gets 2 points, and three "additional CRP criteria" gets 3 points.

QAP Scoring - 8 Community Transformation

For Community Transformation scoring, for demonstrating past experience in community partnerships, you say this must be "Georgia communities." Will you consider work done in Florida or other states?

➤ **DCA Response:** Only work done in Georgia will be eligible under this section. Per the QAP, "the [community-based developer] may meet the requirement by documenting measurable improvement from community partnerships that the CBD has formed in support of their development in another Georgia community."

QAP Scoring - 13 Previous Projects

Can you please provide clarity on how to determine how a prior year 9% allocation results in what amount of points under Scoring, Previous Projects?

➤ **DCA Response:** Please see the Previous Projects Table posted on the DCA website under "Supplementary Documents for Threshold and Scoring."

[Click here for link](#)

QAP Scoring - 16 DCA Community Initiatives

1. Can we use a letter from a GICH community if the proposed development is not located in that community?

➤ **DCA Response:** No. As stated in the QAP, the GICH community letter must "[Identify] the project as located within their stated GICH community boundaries."

2. I have a question about the GICH community letter substantiating that the GICH community picked a particular development for points purposes. Does that approval process for the letter have to go through city council or an elected official?

➤ **DCA Response:** First, per the 2020 QAP, applicants should be reminded that in order to qualify for points under DCA Community Initiatives, applicants must provide two separate letters. One letter must come from "the GICH community's primary or secondary contact on record with the University of Georgia Housing and Demographic Research Center as of May 1, 2020, committing the formal support of the majority of GICH members." The second letter must come from the "Local Government agreeing to the issuance of the letter."

Secondly, the process of a development being selected by a particular community varies by GICH community. To identify the appropriate contact for a particular community, please email Kristyn Cherry (Kristyn.Cherry@dca.ga.gov).