

2020 Q&A Posting #3

April 29, 2020

QAP Threshold - 1 Project Feasibility, Viability Analysis, and Conformance with Plan; Electronic Core Application - 6 Revenues & Expenses

"Per QAP threshold section, it notes that projects with PBRA that have less than 10 years remaining from Application Submission Date must be underwritten within the max tax credit rents and/or HOME rents, as applicable.

This is an existing property that the new owners will do an acquisition/rehab execution on. This project has had HUD PBRA on it since 1985. The latest renewal will expire on 6/25/20. We have submitted for the upcoming renewal to HUD for another 10 years. We expect to have HUD's commitment prior to application submission deadline and will be including it in our application documents, but the effective date of the renewal and increased rent will be dated 6/26/20, which is 8 days after our application submission deadline. In addition, we also expect to see a slight increase on the PBRA renewal. Please confirm we can underwrite the project using the renewed and increased PBRA rent although it be in effect after application submission deadline."

➤ DCA Response: If a commitment for PBRA (for a minimum of 10 years) is provided as part of the application, the renewed/increased PBRA rent may be used for underwriting.

QAP Threshold - 10 Site Zoning

We have a project that we are working on in a city that was supposed to go before Zoning on April 1st and then two subsequent city council hearings. We were notified on March 18th that all rezoning applications were on hold indefinitely, and now all public meetings are cancelled through at least April 30th. Assuming upon that date government services resume, we're still 2 weeks out from being on the next available meeting due to the process it involves, i.e. providing adequate notice to adjacent owners. We are estimating that it wouldn't finish going through the rezoning process until the end of June, best case scenario assuming no back log delays. We believe we stand an excellent chance of getting the rezoning application approved given that there hasn't been any significant development in the immediate area for a considerable time. It would be a shame for us to have to cancel this potential development due to delays that are out of our control. We are worried that if we ask for just an additional 28-day extension, that may not consider any additional delays due to COVID-19, so we are requesting that DCA allow the submission of any governmental controlled items as a post-application submission item. That way DCA can begin to process our application but if our rezoning application is denied, our project would fail threshold and go no further. If that is something that cannot be considered, then we respectfully request a second 28-day extension to July 16th. Thank you"

➤ DCA Response: DCA will announce updated application intake deadlines soon.

QAP Threshold - 16 Building Sustainability

When does DCA anticipate the green training course will be posted on the DCA site?

➤ DCA Response: The Green Building Webinar is located here:

<https://www.youtube.com/watch?v=VozXGGf8Ueg&t=503s>

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 2020 Core App, which will be published in the coming weeks.

QAP Threshold - 26 Integrated Supportive Housing

On the 2019 application tabs checklist, it noted for 26 02 that an administrative plan outlining this tenant selection preference and evidence of a request to HUD for approval of the preference is required. Is this the same as the tenant services plan that we would be submit to HUD? This property has existing HUD PBRA.

➤ DCA Response: The administrative plan is not a required document for 2020.

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.

This section only applies to properties that do not have 100% of the units with PBRA assistance.

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.

QAP Scoring - 3 Desirable/Undesirable Activities

1. Scoring section III. Desirable/Undesirable Activities: For 9% application submission how will “desirable” locations that are identified as “temporarily closed” in google maps (i.e. daycares, clothing retailers). Also, what will be DCA's approach to scoring for businesses that may become “permanently closed” post -application due to the current financial situation?

➤ DCA Response: Temporarily closures at the time of application submission due to Covid-19 are not ineligible for points in this category.

DCA verifies Desirables that are present at the time of application submission.

2. For scattered site, the QAP says that desirable amenities must be measured from the center point of each scattered site locations. Some of the sites we are scoring have multiple buildings. Should the center point be measured from each building or the center point of that parcel if multiple buildings are on that site?

➤ DCA Response: For Scattered Site Projects, desirable amenities must be measured from the center point of each Scattered Site location (parcel if multiple buildings are on that site).

QAP Scoring - 4 Community Transportation Options

1. COVID-19 has affected almost every area of our lives including transit agencies. Many stops and routes have been eliminated and schedules have been reduced. Some of these changes may be temporary but some may become permanent. The problem this poses for applications is that it may be difficult in some cases to provide the required documentation if a site is near a bus stop but this stop or route has been effected by rescheduling or temporarily eliminated. How will this be dealt with?

➤ DCA Response: Application intake has been pushed back to June 18, 2020. See DCA's website here: <https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/compliance-monitoring/covid-19-interim-response>

Any future deadline extensions will be posted at the link above as well.

Minimum documentation for Section IV. Community Transportation Options includes:

- PDF of the transit service webpage documenting the following criteria. If the website does not include all criteria, a letter from the transit agency is required including all criteria listed below, as well as the transit service's phone number and email address.
 - Webpage URL
 - Cost of service
 - Relevant transit route(s)
 - Route schedule
- 2. I am aware of the app date being pushed back, but I am finding that a lot of transit agencies are reducing service. I am not sure that things will be back to normal even by June 18 so this is a cause for concern. I thought that there was a requirement that there be a minimum frequency of stops but maybe that is no longer the case. My other concern is what happens if at the time of application, the route or stop is temporarily no longer in service?

➤ DCA Response: Transportation service must be available to all residents of the proposed development/site.

A website and/or letter from the transit agency can detail any temporary suspensions and timetable for reactivation.

QAP Scoring - 5 Enriched Property Services

1. If providing an education program to residents, at minimum how frequently does this program need to take place?

➤ DCA Response: While there is no explicitly stated minimum required frequency of services for subsection A. Education Outcomes, applicant scores will be based on DCA's review of, among other minimum documentation:

- a detailed plan for service provision
- a plan for tracking measurable benefits and outcomes for residents, stating:
 - 1) the outcomes to be measured; and
 - 2) how these outcomes will be measured.

Applicants will be required to provide results in annual reports to DCA for a period of not less than five years following the development's placed-in-service date.

Please see the QAP for additional documentation requirements.

2. We anticipate claiming points under the Preventive Health Care section. Are there specific requirements for the designated screening space? Does it have to be a permanent single-purpose space to only be used for screening? Does it have to meet the same requirements as a wellness center as described in the additional amenities guide? If not the same as wellness center requirement, can the designated screening space be set up temporarily as needed (i.e. can we put up a partition to do the screening when the service provider comes in the community room or conference room)?

➤ DCA Response: Minimum documentation for this section must only describe the designated screening space. DCA does not specify minimum requirements for this space, however, screening spaces must protect the privacy of the parties being screened.

QAP Scoring – 7 Revitalization/Redevelopment Plans

I am looking for an updated Community Revitalization Plan Certificate for the 2020 round. I see that DCA hasn't uploaded a more recent version to the website. Can you tell me if there is going to be a 2020 certificate? And if so, when it is expected to be uploaded to the website and how similar it is going to be the 2019 form?

➤ DCA Response: There is no Revitalization Certificate for 2020 because it was duplicative of the information required in the core app. The Certificate is not listed as a minimum document in the QAP.

QAP Scoring - 9 Stable Communities

In regards to the applicable points under Enterprise Community Partners Opportunity360, I have come across several census tracts that, for 2020's data, they receive a numeric score for the Economic Security subsection but no data has been published for the Health and Well-Being subsection. My question is, if no data has been published for 2020 under one of the two subsections, can we use the last data published?

➤ DCA Response: A large number of census tracts do not have Health and Well Being scores for 2020, but the same is not true for 2019. As stated in the Opportunity 360 Scoring Table Instructions tab (link below), 'The applicant may qualify for points based on either the 2019 or 2020 data.

<https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/housing-tax-credit-program-lihtc/2020-qualified>

DCA Manual – Relocation

With the current COVID-19 pandemic, we are extremely cautious with limiting physical contact with our senior residents. Typically, property management would set up a meeting with the residents as a group to explain we are planning to do renovation and submitting a tax credit application and therefore, there will be forms such as the tenant data forms and GIN forms that they will have to sign. We can still have the residents sign these forms but without having the large meeting, it may cause confusion for some residents on why they are being asked to sign the forms. There are over 100 units on this property. We want to see if DCA has any input on how other developers are handling this or if DCA has any suggestions. Also, is there any possibility DCA may allow these forms to be provided at a later date after application deadline when the pandemic calms down?

➤ DCA Response: DCA will announce updated application intake deadlines soon.