

2015 DCA Qualified Allocation Plan
General Questions & Answers
Posting #3
March 26, 2015

QAP Threshold - 1 Project Feasibility, Viability Analysis, and Conformance With Plan

1. My development team has asked me to work up HUD utility models for the application process. I just need to know what, if any, are the specific requirements to use the Energy Star rating. Energy Star Standards will be met in the construction itself and all appliances will be Energy Star rated. Is there anything further that DCA requires prior to using the rating on the HUD utility models?

Response: If the Applicant agrees to provide Energy Star appliances and conform to Energy Star Standards for construction and make such representations in the Application, DCA will verify, prior to issuance of forms 8609, that such representations made in the Application are fulfilled. Failure to meet these standards jeopardizes the credit allocation. No other information is needed in order to use Energy Star in the HUD utility model.

If you are applying for a HOME Consent, please use the most recent available utility allowance provided by the Public Housing Authority that administers Section 8 for the location in which the proposed property is located for pre-application purposes only. If your property is selected, the utility allowance as detailed in the 2015 QAP Threshold, page 5 of 60 will be required for Application Submission.

QAP Threshold – 7 Environmental Requirements

1. If EPA did Phase 1+2 for a brownfield site, do we need to redo a Phase 1+2 with DCA approved consultant or can we use EPA's.

Response: DCA requires that applicants follow the ASTM 1527-13 standard for the Phase I report and that the report includes the additional investigative and testing requirements that exceed the ASTM Standards and are included throughout Section II of the 2015 DCA Environmental Manual. Some of these extra requirements are referred to as “non-scope considerations” in Section 13 of ASTM E 1527-13. Where DCA guidelines are more stringent than ASTM Standards, the DCA guidelines are to be considered controlling. The Phase I Report must be in the format shown in Section V: Required Format for Phase I Report in the 2015 DCA Environmental Manual. In no event may a Phase I Report greater than one year old at the time of Application submission be submitted or an update of such report be submitted. Once a Phase I Report is greater than one year old and entirely new Phase I Report is required. If an updated Phase I Report is between 180 days and 1 year old at the time of application submission, the report can be updated. If Environmental Phase I and II conducted for the brownfield site meets all applicable DCA environmental

2015 DCA Qualified Allocation Plan
General Questions & Answers
Posting #3
March 26, 2015

requirements and the environmental reports generally follow the DCA required format, you may use the existing environmental reports, assuming that the brownfield site includes the entire proposed project site.

QAP Scoring - 6 Sustainable Developments

1. Under sustainable development, we used to need a certificate from a Southface training. Do we still need to do/submit that?

Response: No. Under the 2014 QAP, an Applicant claiming points for Sustainable Communities were required to submit a copy of an executed EarthCraft Communities Memorandum of Participation with their Application. This requirement was eliminated from the 2015 QAP. However, DCA strongly recommends that Applicants claiming these points enroll in one of Southface's Green Building for Affordable Housing Training Courses to ensure that a completed project will meet the required standards.

QAP Scoring - 9 Phased Development/Previous Projects

1. Is an application that received an award in the last five rounds eligible to apply for and receive four (4) points for a phased development if in the original application that previously received funding the applicant responded to the "Phased Project" question with "no". All other criteria for phasing points are clearly met including that site control was established for all phases when the initial phase is closed and that at least one phase has commenced construction per that application as of the 2015 Application Submission deadline (6/11/15).

In the original application, the Phased Project question was interpreted to mean if the initial application was a subsequent phase of another previous project which was not the case and that was the reason that the "no" box was checked.

Response: If all criteria and documentation required in the 2015 QAP are met, the failure to check the 'yes' Phased Project block on the previous Application would not prevent the project from claiming points.

QAP Scoring - 15 Leveraging Of Public Resources

1. Will a grant from a county to a city for work to remediate a brownfield issue for the site count as local government contribution?

Response: Under the heading Local PHA/Government Contribution, long term leases are the only source that can be considered for points. The grant would have to meet all of the requirements under Leveraging of Public Resources on page 18-19 of 34 in order to qualify for points as a Qualifying Source.

2015 DCA Qualified Allocation Plan
General Questions & Answers
Posting #3
March 26, 2015

QAP Scoring - 17 Integrated Supportive Housing

1. Under Integrated Supportive Housing section A, to receive the 2 pts, is there documentation needed or do you simply select that one.

Response: It is a selection, no documentation is required. Please note that to be eligible for these points, at least 5% of the total low-income units in the proposed Application must be one bedroom units.

QAP Scoring - 19 Preservation Priority Points

1. How will DCA Portfolio Management select the one "high priority" property eligible to receive the 2 points under Preservation Priority Points? Is there an application process for this?

Response: The Applicants interested in being considered for DCA Portfolio Management's High Priority designation should submit the requested documents with the application materials on June 11, 2015. The instructions and priority factors considered for these points have been posted to the DCA website at: <http://www.dca.ga.gov/housing/HousingDevelopment/programs/QAP2015docs.asp>

DCA Manual – Architectural Standards Manual

1. In the QAP and the Architectural Standards Manual, you tell us that if a unit interior dimension is less than 10% deviation from the DCA standard, then we don't need to do a pre-app, to submit it the full application. The manual says that DCA may grant a waiver if the deviation is less than 10%, but it doesn't really give any indication of certainty. Do you think it's a "fair bet" that anything under 10% will get approved? Also, would an applicant still need to pay the \$1,500 waiver request fee, at the time of the full application, if they request this?

Response: While DCA typically does approve small deviations (those under 10%) during the waiver process, it cannot say with certainty that all requests will be allowed. DCA reserves the right to deny the requests during the review of the full application submission. Yes, the \$1,500 waiver request fee is required with the full Application.

Other

1. Are waiver applications (such as a noise waiver) due at the Pre-App date or at a later date?

2015 DCA Qualified Allocation Plan
General Questions & Answers
Posting #3
March 26, 2015

Response: DCA is not accepting noise waiver requests for the 2015 round; other waivers were due at the pre-application submission deadline of March 19 with the exception of the payment and performance bond waiver requests, which will be due at the Application submission deadline.

2. Regarding Targeted Population Preference, must a PHA amend the administrative plan for the project in question or for the entire voucher program?

Response: The tenant selection preference should impact the full Administrative Plan, and must be approved by HUD. DCA will hold a roundtable on April 1, 2015 for Public Housing Authorities (PHA) that are interested in seeking points through the QAP under the Integrated Supportive Housing Target Population Preference for tenants covered by the Department of Justice Olmstead Settlement Agreement.

3. Sustainable Communities site development packet/feasibility study still listed on pre-app docs. Is it required?

Response: The following is the process that Applicants should follow if claiming Sustainable Community points in the upcoming competitive round:

- A. *The Applicant must submit a completed ECC Site Analysis Packet to Southface by April 17, 2015 in order to ensure that the draft score sheet can be completed by Application Submission date, June 11, 2015.*
- B. *Details on what must be contained within the ECC Site Analysis Packet can be found on the Earth Craft website under the Resources tab - <http://www.earthcraft.org/builders/resources/>*
- C. *After submission of the Site Analysis Packet, Southface will review the packet and perform a Site Visit as the basis for completing a "Preliminary Scoring" of the ECC worksheet. (This includes a 4 hour meeting that takes place at or near the proposed ECC site during which it is confirmed that the initial Site Analysis Packet is sufficient and that the present community/property design is meeting all of the threshold and competitive criteria of the ECC program.)*
- D. *Dependent on the outcome of the Preliminary Scoring of the ECC worksheet, a proposed property will be invited to participate in the ECC program via a Memorandum of Understanding (MOU).*
- E. *Upon the property being issued a LIHTC award, the ECC Memorandum of Understanding would be initiated and the property would formally enter into the ECC certification process.*
- F. *If issued an ECC MOU the development team will submit this MOU to DCA along with their full construction documentation.*

2015 DCA Qualified Allocation Plan
General Questions & Answers
Posting #3
March 26, 2015

4. *Unless waivers are approved, 4% credits applications must meet the same rehab and sustainability requirements?*

Response: Yes, 4% credit applications must meet all applicable threshold requirements.

5. Or can qualification package be submitted if a site has not been identified by March 12?

Response: Please see prior response #2 under QAP Threshold – 20 Qualifications For Project Participants (Performance) from Posting # 2, March 16, 2015.

6. 2015 Pre-Determination Submissions states "Please make all checks payable to Georgia Housing and Finance Authority (GHFA)." In the State of Georgia Allocation Plan, exhibit A, page 38, it states "All checks should be made to the attention of OAH Billing Department." My question is, for pre-application payments, specifically Qualification Determination, who should we write the check out to?

Response: All checks should be payable to GHFA, it should be addressed to the attention of OAH Billing Department.

7. It is our understanding that HOME-funded projects must use the HUD model to calculate the utility allowance and that this must be submitted with our HOME consent application on March 19th. Our first challenge in meeting this requirement was finding a consultant who could do this work, but we have found someone. However, in order to provide us with meaningful utility allowances, they need full plans for the units as well as additional information for an accurate allowance.

They have requested a unit matrix detailing different types of units by bedroom/bath configuration as well as heated net leasable square feet, and a floor plan with unit types identified. If we don't have this, they will just run generic utility allowances on the unit matrix, but later will have to revise the allowances based upon those units with 2 or 3 exterior walls, and those with only 1 exterior wall. In addition, they will need a description of the HVAC system with fuel sources and efficiencies, ceiling height, a description of Domestic Hot Water system with fuel sources and efficiencies, a description of appliances, and a description of windows and doors. The list goes on. This is extremely early in our process, and quite frankly, we don't have this information yet. Our consultant has cautioned us that the utility allowances we obtain are only as good as the data we give them and they enter. They can make assumptions, but too many assumptions will corrupt the study. Is this something that must be

2015 DCA Qualified Allocation Plan
General Questions & Answers
Posting #3
March 26, 2015

submitted by March 19th or could we provide an estimate from the local PHA? It seems likely that the utility allowance obtained using specifications that are unique to our property will yield lower allowances than the PHA numbers. Once plans are more refined - and well before the June application deadline - we would have the information necessary to produce meaningful utility allowances using the HUD model.

Response: This has been addressed by DCA's email, 2015 Housing Finance & Development Update #15, sent on March 16, 2015 in which we allowed the use of the appropriate Section 8 Administrator's utility allowance at pre-application. If your property is selected for a DCA HOME consent, the utility allowance as detailed in the 2015 QAP Threshold, page 5 of 60 will be required for Application Submission.