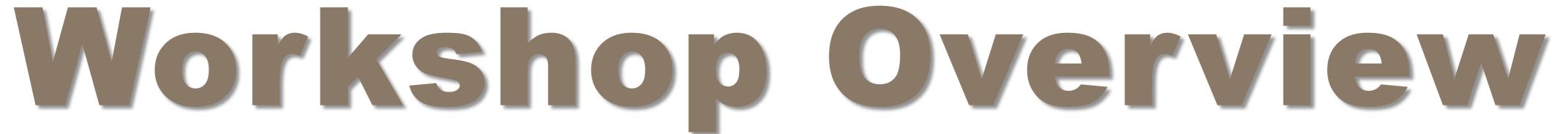
2023 QAP Workshop



February 6, 2023









Agenda

8:00 - 9:00 a.m.	Registrat
9:00 - 11:00	DCA Pre
11:00 - 11:15	Break
11:15 - 12:00	DCA Pre Q&A
12:00 - 1:15 p.m.	Lunch &
1:15 - 2:15 p.m.	Breakout
2:15 - 3:00 p.m.	Summari Q&A

tion and Continental Breakfast esentations esentations (continued) & Networking t Table Discussions ies of Breakout Table Discussions



Keep in mind: Verbal Comments from DCA Staff

- You can only prepare your applications based on what DCA has published in writing – not what someone says verbally today
- Goal is to hold discussions that:
 - Identify policy ambiguity or concerns from our partners, to help prioritize future guidance
 - Provide more context than is often possible in Q&A





Keep in mind: Verbal Comments from DCA Staff (cont'd)

- Published guidance requires approvals from several parties, not individuals. Individuals will convey their best understanding today for purposes of promoting dialogue.
- Nothing that is stated verbally can be used for purposes of Competitive Round review or appeals.
- If your application will rely on information for which the only source is a verbal statement, you must submit a question through the Q&A process to ensure DCA issues public, written guidance addressing the matter.



Have questions during the presentations? Submit them through Menti!

Go to www.menti.com • Use this code:

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DCA Presentations



Opening & Special Topics



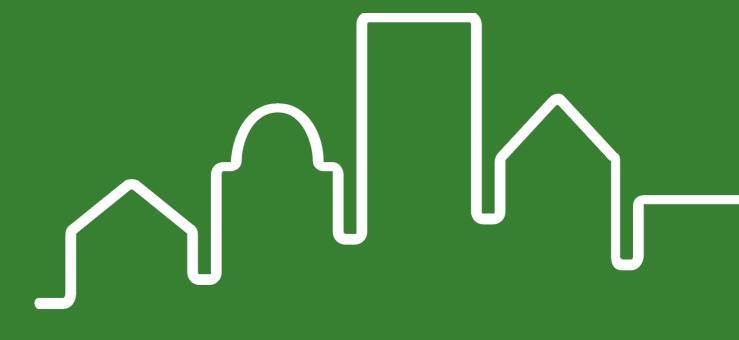




Director Updates

Staffing, Bonds, General Trends, Upcoming Year



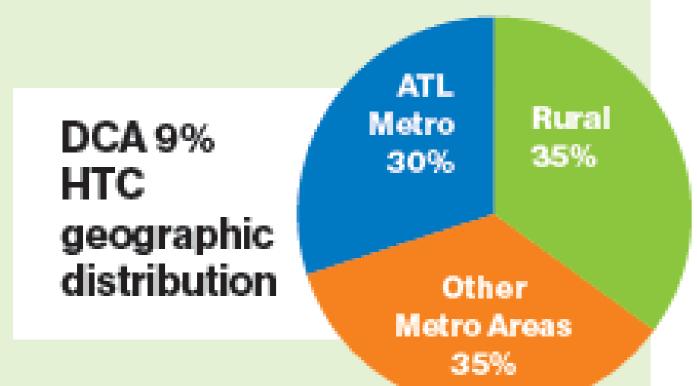


9% Housing Tax Credit Developments Awarded in 2022

\$27 million received in 9% HTC allocation

across Georgia

1,777 units of 9% housing tax credits awarded



Gap Funding for Construction Cost

Covid-19 resulted in significant funding gaps for 9% HTC developments

27 developments stabilized with low-interest loans

2,100+ affordable homes were constructed or preserved

\$84 million in federal funding



2022 Recap:

4% Housing Tax Credits/Bond Developments

6,397 units funded with 4% Housing Tax Credits

First Time DCA accepted competitive 4% Housing Credit/Bond applications

\$1.814 billion for 73 applications received

9x oversubscribed



2023 Private Activity Bond Allocation

Local Reservation: \$105,745,768

URFA Reservation: \$105,745,768

GHFA Housing Share: \$345,065,139

Total Housing: \$556,556,675







~ \$200 Million



~ \$5556 Million









4% Housing Tax Credit/Bonds



2019-2020 4% HTC/Bonds

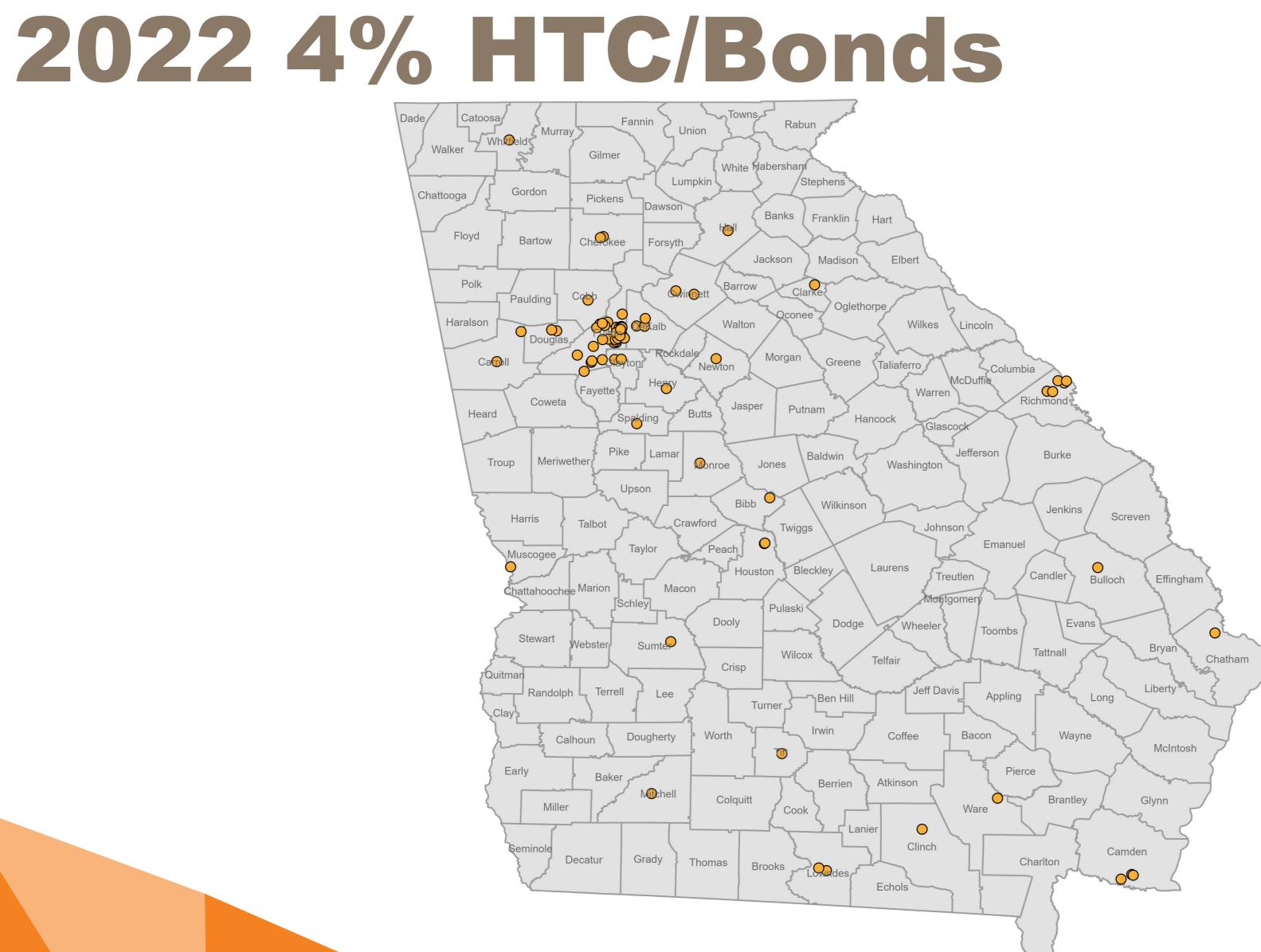
- In 2022, \$716 Million reserved for multifamily
- Pipeline of 2019-2020 4% applications cleared out
- 79 2020 4% applications
 - 12,465 Units
- No additional issuance





- 73 Applications, \$1.8 Billion in requests
 - Average bond request: \$24.8 Million
 - 3.3X oversubscribed
 - Likely will stabilize
- 11 of 12 Regions







- Award Process Mirroring 9%
 - Preliminary scores February
 - Final Announcement February/March
 - Reconsideration/Appeals Process
 - Only if eligible

Highest scoring, regions, 1-1 Ratio of New Supply/Preservation



- Notice to proceed 40 days to submit pre-app; 60 days after pre
 - app determination to submit full application
 - Applicants can submit any time after notice to proceed
 - Waivers
 - No extensions
 - Full application through Emphasys



2023 4% HTC/Bond Deadline

New applications in Q4 of 2023



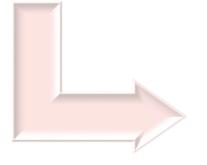


4% HTC/Bonds Deadlines

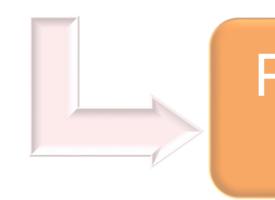
Competitive Review Deadline Announcement

120+ days before Competitive Review Application Deadline

Intent to Apply Deadline 1 month before Competitive Review Application Deadline



Competitive Review Application Deadline



Fall 2023

Failure to meet Pre-Application and Full Application deadlines will result in withdrawal of award

Pre-Application Deadline 40 days after Competitive Review selection

Full Application Deadline 60 days after Pre-Application approval





Fee Updates

- 9% Application fees: \$8,000/\$10,000
- 4% Application fees staying the same
- Architectural Waivers: \$2,500
- Underwriting Fees: \$15,000



Cost Increases NOFA



Cost Increases NOFA

- Funded all 27 requests \$84 Million
 - 2,100 units
 - HOME and NHTF fully committed
 - Loan committee
 - Loan closings moving forward
- No monthly draws, now 25% disbursements





General Updates



General Updates

- No additional credits
- Increasing stability
- Upcoming roundtables
- More development check-ins
- Clarifications





Competitive Round Updates

2022 9% Applications, 2023 9% Applications



2022 9% HTC Round Trends & ssues



2022 9% Round Trends

- No RAD Preservation Set Aside applications
- No City of Atlanta applications
- No Historic Preservation points claimed





2022 9% Round Application **S**SUes

Unexecuted documentation

 Documentation not in existence prior to **Application Submission**

Inadequate room in budget for DCA adjustments





2023 Application Deadlines



9% HTC Deadlines

Pre-Application Intent to Apply Full Application



March 3, 2023 April 19, 2023 May 19, 2023



Intent to Apply for 2022 4%/Bonds

Please complete the form below if you intend to submit a 2022 4%/Bonds Application. This will allow DCA to adequately prepare for Application reviews. Applicants should submit a separate survey for each Application. DCA asks that Applicants complete the form by September 23. Direct any questions to <u>Mitchell.Kelly@dca.ga.gov</u> and <u>Meagan.Cutler@dca.ga.gov</u>.

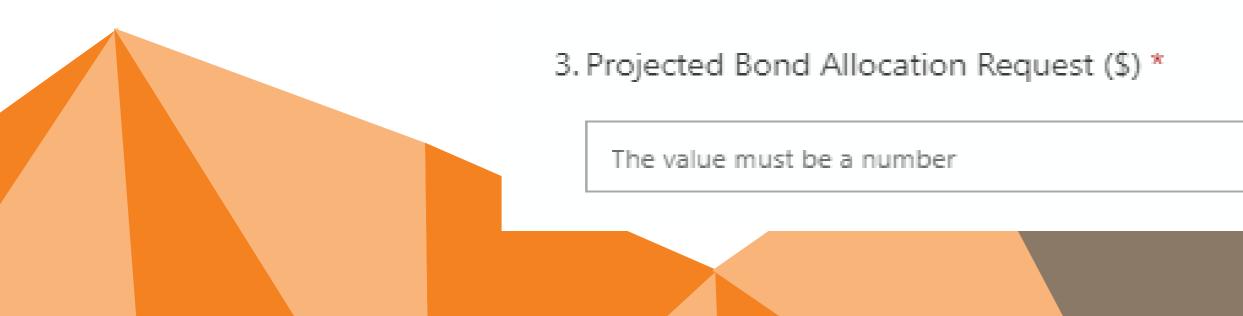
* Required

1. Development Company *

Enter your answer

2. Location (City, County) *

Enter your answer





Have questions for this team? Submit them through Menti!

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Compliance & Asset Management







Performance Workbook Questionnaire and Compliance Performance Scoring

Threshold & Scoring Changes

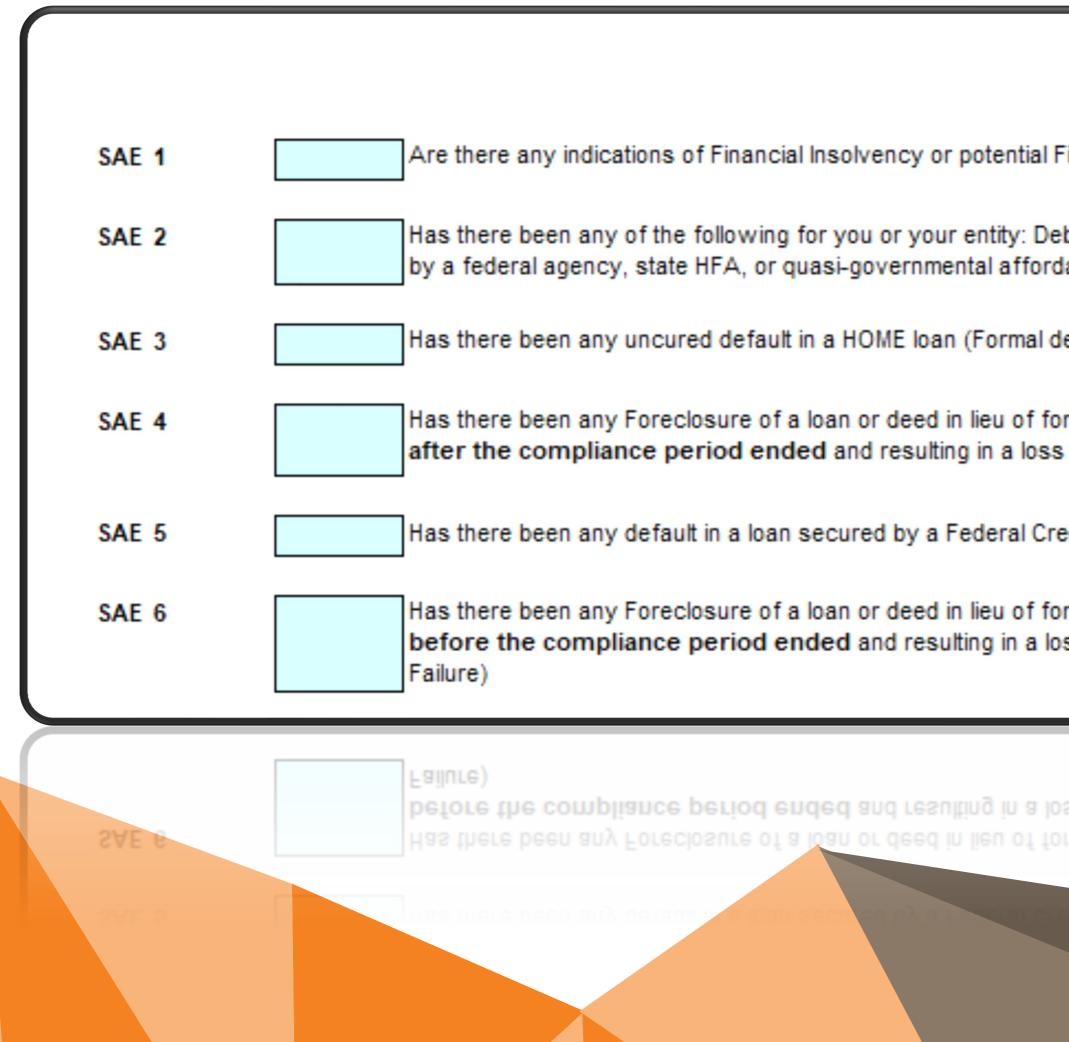




- Significant Adverse Events (SAE) and Adverse Circumstances (AC) removed from QAP and are comprehensively contained in the Performance Workbook
- All SAEs and ACs will result in point deductions in the Compliance Performance Scoring Section - corresponding lookback periods are listed for each SAE and AC
- Fair Housing SAE has been updated
- Additional Disclosures







	If Yes, provide the event	Lookback period for Scoring Section XXIII. Compliance	
	date	Performance	
Financial Insolvency of the Project Team?		10 years	
ebarment, debarment proposed, or have you received a suspension dable housing program?		10 years	
default letter issued)?		10 years	
oreclosure, which is secured by a Federal Credit (LIHTC) property is of affordability during the extended use period?		10 years	
redit (LIHTC) property?		5 years	
oreclosure, which is secured by a Federal Credit (LIHTC) property loss of affordability during the compliance period? (Major Project		10 years	
			1
oreclosure, which is secured by a Federal Credit (LIHTC) property loss of affordability during the compliance period? (Major Project			
		ο λοστα	



SAE 18	Has the Department of Justice opened an inquiry or inves Determination of Reasonable Cause and/or Charge of Di Property for which you had any ownership interest in, in ar

Additional Disclosures

Are you, or any entity in which you have a direct or indirect interest as owner and/or developer, currently involved in any litigation? If yes, provide the following on each case: Identification of plaintiff(s) and defendant(s) and narrative explanation of the particulars of the case. In the event the monetary claim is in excess of \$50,000 please provide a copy of the Plaintiff's suit (suits related to routine evictions do not need to be disclosed).

	-	
stigation that is based on an adverse Fair Housing Finding,		5 yea
Discrimination, by any government agency, at any Affordable Housing		
any capacity, at the time the incident occurred?		





- Successful Properties
 - compliance point deductions
 - "Successful" is defined in the QAP
 - Must currently own the property to qualify for point additions



Please list your properties and claim point additions, even if you self-score with no



Compliance Performance Scoring

Clarification:

State of Georgia 2023 Qualified Allocation Plan: SCORING CRITERIA

XXIII. COMPLIANCE PERFORMANCE

Up to 10 Points

Each Application will start with an award of ten (10) Performance Points. An Applicant's score in this section is a net score and may be negative.

Each Application will start with an award of ten (10) Performance Points. An Applicant's score in this section is a net score and may be negative.



Exceptional Nonprofit/PHA

Scoring Rubric Changes



Updates and Clarifications

- **Operating Sustainability Calculation**
 - Example: The Nonprofit's cash and investments are at least 50% of annual operating expenses for the most current year. This will be calculated using: **Unrestricted Cash/Total Operating Expenses**
- Ineligible in this section if you received points and were funded in 2022
- Tiebreak
 - 1 Did not receive ENP/EPHA points in 2021 or 2022
 - 2 Strongest technical expertise per rubric guidelines



Compliance and Asset Nanagement Updates





New Compliance Manual



LIHTC & HOME Compliance Manual

- Published January 24, 2023 and applicable to all properties with DCA/GHFA funding
- Provide public comment yearround here

Georgia[®] Department of Manager Community Affairs | Technical Guidance

LIHTC & HOME Compliance Manual



January 2023 Edition

See the Compliance Manual here.



Compliance and Asset Management Fees





Compliance and Asset Management Fees

- Public comment period November 14, 2022 January 14, 2023

Fee Type **Credit Compliance Monitoring** Re-inspection/Additional inspection HOME Asset Management Noncompliance fee* Management Company Approval/Change

*Late Annual Owner Certification, Late HOME Rent Review, Late submission of audit/inspection cures

Removed from QAP and are available on the DCA website. Effective January 15, 2023

Status from 2022
No change
New
No change
New
No change



Ownership and Management Company <u>Changes</u>





Ownership and Management Company Changes

- All ownership changes require notification to and approval from DCA Asset Management via Project Concept Change
- All incoming applications must include a DCA-Approved or Conditionally Approved with Limitations management company





Ownership and Management Company Changes

- All Management Company changes require approval from DCA Office of Portfolio Management via the Management Company Change/Approval policy
- Management changes are subject to DCA review of current compliance status across the proposed management company's DCA portfolio, including but not limited to:
 - Previous audit/inspection results, Emphasys reporting, Annual Owner Certifications, HOME Rent Reviews



Have questions for this team? Submit them through Menti!

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Development Federal Compliance







Environmental Reviews

Environmental Manual Changes: Historic Preservation Review Process

- Only applicants awarded under Competitive Round are required to submit Environmental Review (ER) Form and supporting documentation to Historic Preservation Division (HPD) within 15 days of the award list being announced.
 - All documentation can be submitted for HPD review to er@dca.ga.gov, or on project submission portal detailed in HPD slides



Environmental Reviews: Important notes

• HPD response letters are valid for up to 3 years. If there are substantive changes to the project or if a federal fund becomes involved, further consultation with HPD is required.







Environmental Reviews: Important notes (cont'd)

- Any physical activity including demolishing is prohibited:
 - Without consultation with HPD,
 - Before HPD consultation is complete, and
 - Without DCA environmental clearance.
- Demolishing is not allowed for NHTF projects.
- Intentional destruction of a historic property and failure to allow the ACHP to comment are both violations that could prevent HUD from approving RROF.



Environmental Reviews: Common Issues

- Missing signatures on Environmental Certification
- Missing signatures on Owner Questionnaires
- Missing environmental transmittal
- Applicable floodplain insurance documents are not included
- Proper wetland delineation is not included.







HIStoric Preservation, LIHTC and GEPA Reviews

Historic Preservation Division





Georgia Environmental Policy Act (GEPA)

 GEPA is a State law that requires State agencies to consider the impact of governmental actions on the environment, including historic & cultural resources





HPD's Role in the GEPA **Review Process**

 To assist state agencies and their applicants in assessing the impacts of projects on historic & archaeological resources listed in or eligible for listing in the Georgia **Register of Historic Places**







Consultation with HPD After Award Complete the Environmental Review Form Provide project information Include maps & photographs

- Submit the project materials online!





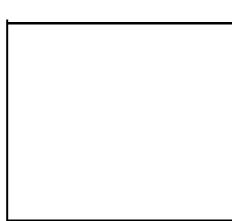
NEW ONLINE PROJECT SUBMISSION PORTAL

Brian P. Kemp Governor

Welcome to the DCA – Historic Preservation Division (HPD) Environmental Review (ER) External Application System

It is our hope that this online project submittal system will make the environmental review process more efficient for all users. Electronic submission of projects via email to <u>ER@dca.ga.gov</u> also remains an option. Mailing of paper project materials is no longer available, except for archival copies of mitigation materials.

Details related to submitting a project to ER/HPD for review, including the *Environmental Review Form* and answers to frequently asked questions, can be found on our website at: <u>https://www.dca.ga.gov/georgia-historic-preservation-division/review-compliance</u>





Christopher Nunn Commissioner

Link to External User Database https://hpd.ga.gov/nrtigers/login



Significant Impact: Causes & Resolution

- Introduction of incompatible visual or atmospheric elements
- Change in use, character, or setting
- Destruction or damage
- Avoidance/Minimization
- Mitigation





Final Points to Remember

- Cold Reader
- Sufficient Documentation
- Clear/Color Photos and Maps
- Site Plans and Elevations
- A Significant Impact is NOT the end & does NOT stop a project
- HPD is here to help!





Occupied Developments



Occupied Developments: Changes

2023 DCA Relocation Manual is applicable to Housing Tax Credit only.

and notices.



- Requirements for program-specific funding (HOME, NHTF, and CDBG) and federal funds
 - not allocated by DCA (such as RAD) can be found in their respective regulatory manuals





Occupied Developments: Reminders

- Relocation can impact underwriting costs, funding structure, timeline and other application development areas.
- DCA relocation survey in the Core Application must be completed regardless of occupancy type.
- DCA must approve all temporary relocation or permanent displacement of residents.







Have questions for this team? Submit them through Menti!

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Office of Housing Finance: Construction Services Underwriting







Construction Services



Rehabilitation Standards

Minimum dwelling unit hard costs increased: 2022 QAP: \$25,000 hard costs/unit 2023 QAP: \$35,000 hard costs/unit





Architectural Design & Quality Standards

natural or manufactured stone, or a product that provides a: 2022 QAP: 40-year warranty 2023 QAP: 30-year warranty

- B. Standard Design Options for All Projects, Exterior Wall Finishes: "brick,



Architectural Design & Quality Standards

C. Broadband Access: changed capability to transmit in the upstream direction from:

2022 QAP: 3 megabits per second

2023 QAP: 5 megabits per second



- XV. Site Information and Conceptual Site Development Plan
- B. Location/Vicinity Map is no longer a minimum requirement.





GHFA Disbursement Changes Beginning with the 2022 NOFA recipients, GHFA will disburse funds in 25% construction completion increments (instead of on a monthly basis).



Architectural Waivers

- All architectural waivers should be submitted at **Pre-Application** stage, not after construction has commenced.
- If a waiver is needed after the development is awarded, email <u>Gary.Huggins@dca.ga.gov</u> to confirm that DCA would consider that change before you submit a PCC to <u>pccsubmissions@dca.ga.gov</u>





Underwriting Threshold Criteria



- Reasonableness of Operating Cost
- Rent
- Commitments
- Underwriting Policies

Project Feasibility



Reasonableness of Operating Cost

- Common Issues:
 - Supporting documentation including calculation and methodology from service provider for estimates of impact fees, taxes and property insurance is required.
- Do not include prefunding of asset management fees, taxes or insurance in development budget.





Reasonableness of Operating Cost: Common Issues

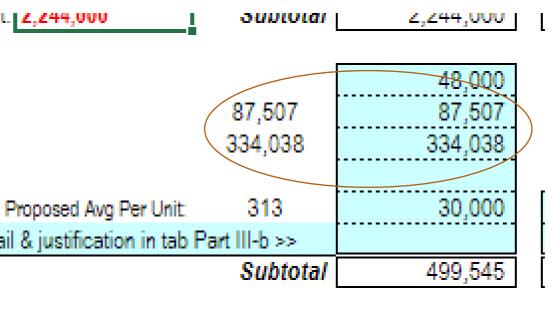
- Operating Deficit Reserves are the minimum DCA requirement or syndicator if higher
- Rent up reserves are required on all projects

LIMIL 2,244,000

START-UP AND RESERVES

Marketing Rent-Up Reserves Operating Deficit Reserve: Replacement Reserve Furniture, Fixtures and Equipment << Enter description here; provide detail & justification in tab Part III-b >>







Rent Effective Dates: QAP Changes

9% Competitive Round feasibility analysis:

- Rents should be based on the most up-to-date information available when submitting the Full Application.
- Applications for 9% Credits have the alternative option to use rents in effect as of January 1, 2023.
- For Applications that fail a DCA underwriting requirement, DCA will not re-underwrite the deal under a different set of rents.
- Applications that fail to accurately reflect either rents option will be underwritten using rents in effect as of January 1, 2023.



Commitment Requirements: QAP Changes

- Commitment letters must include application fees, origination and any additional underwriting fees included in development budget.
- All "other" cost included in development budget will be scrutinized.



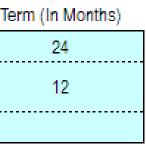


Underwriting Policies: Common Issues

financing.

DEVELOPER'S FEE Cre	edit Type: 9%			CONSTRUCTION FINANCING				
Developer's Overhead		50.000%	841.500	Financing Type	Name of Financing Entity	Amount (\$)	Effective Interest Rate	Ter
Developer's Fee earned during (Construction Period		should also be included in	Mortgage A		12,500,000	4.000%	
Consultant's Fee		0.000%	anouro diso de moladea il	Mortgage B		640,000		
Guarantor Fees				Mortgage C				
Developer's Profit			841,500	Federal Grant State, Local, or Private Grant			-	
	Limit: 1,683,000	Subtota/	1,683,000	Deferred Developer Fees		973,301		
START. HP AND RESERVES				Federal Housing Credit Equity		874,712	-	
				State Housing Credit Equity		515,160		
				Other Type (specify)				
				Other Type (specify)			_	
				Other Type (specify)				
				Total Construction Financing	I	15 502 172		

Developer Fee earned during construction can be used for construction



Underwriting Policies: Common ssues

- DCR requirements for each year of compliance period
- All DCA underwriting assumptions are required unless a DCA underwriting waiver is granted.
- Utilize Q&A





Bond Requirements



Bond Requirements: QAP Changes

the Competitive Review Application Deadline.



 DCA will not select any Competitive Review Application submitted in 2023 by an Owner and/or Developer that has a 4% Credits/Bonds property that received an LOD from DCA in 2021 or earlier that has not closed their financing and started construction on that property as of



Site Control



Site Control Documentation: **Common Issues**

- Warranty Deed, Sales Contract or Ground Lease/Option
- Common mistake? Assignment
- If site control document is not in name of GP or LP an assignment is required.
- owner.



Also required is a settlement statement or warranty from current property



Qualification Determination (QD): Experience



QD Experience: **Required Documentation**

- Required Documentation
 - Completed Experience Tab of PW 5 Deals
 - ownership
 - 8609s
 - Occupancy Reports

Syndicator letters & LPA's confirming role and at least 20%



QD Experience: Common Issues with Required Documentation

- Required Documentation
 - Completed Experience Form of Performance Workbook (5 Successful Projects PIS after 1/1/12)
 - Syndicator letters and Limited Partnership Agreement confirming role and at least 20% interest in General Partner <u>and</u> Developer entities
 - 8609s/Occupancy Permits
 - Trailing twelve-month occupancy reports
- Common mistake? Syndicator letters not confirming interest in both
 General Partner <u>and</u> Developer entities.



Underwriting Scoring Criteria



Deeper Targeting/Rent/Income Restrictions



Deeper Targeting/Rent/Income Restrictions

- QAP Change: Existing PBRA contracts are eligible for points.
- Reminder: PBRA is for 30% of units and has a minimum of 10 years remaining on contract at time of application.





Underwriting: Post Award

Post Award: Common **Issues/Delays**

- 90 day underwriting review with complete final application
- Responding to clarifications timely
- Reserves approved at underwriting will be required at final application. DCA requirements and underwriting approvals are the minimum unless syndicator has higher requirements.
- Project Concept Change request should be submitted prior to final application.



Have questions for this team? Submit them through Menti!

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Public Releases: Forms, Manuals, and Q&A







Forms & Manuals



Application Manuals and Forms Publishing

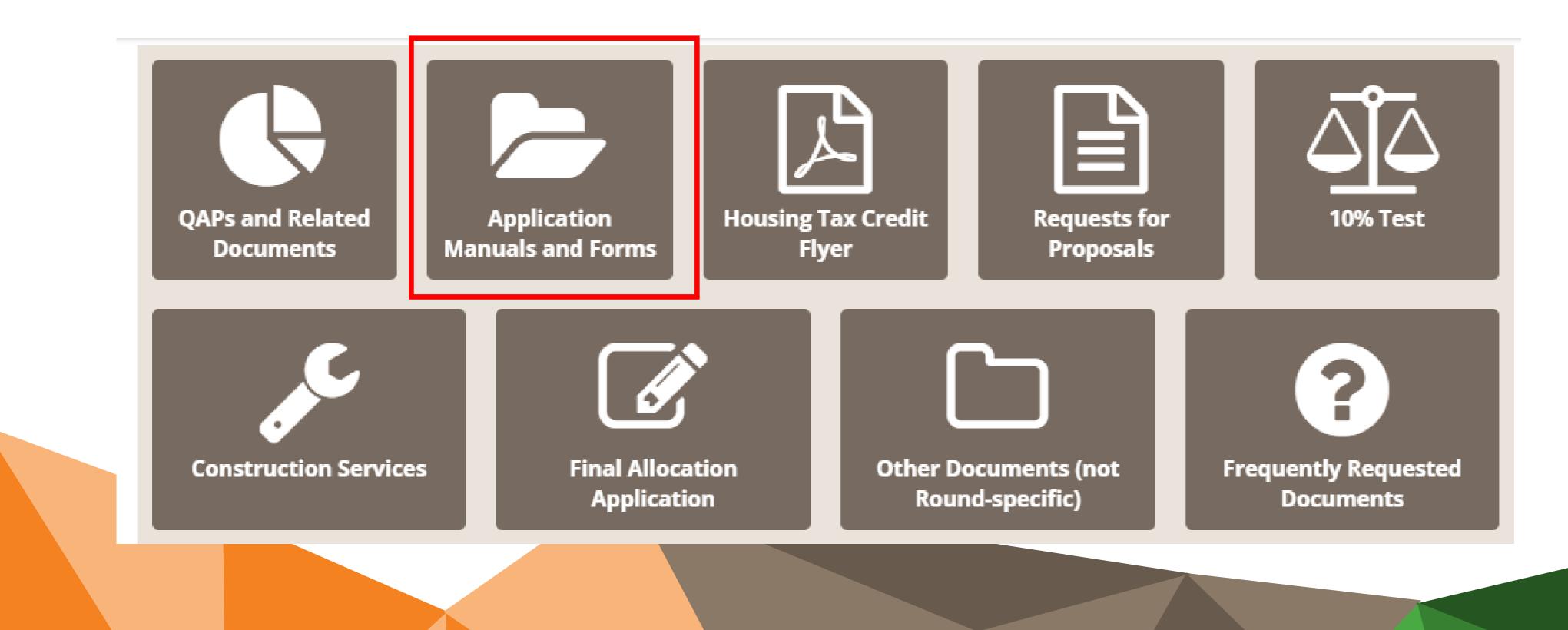
 Starting under the 2023 QAP, any form, manual, or scoring document that includes a policy or decision not already reflected in the 2023 QAP will be posted for a (minimum) 30-day public comment period.





Application Manuals and Forms Publishing (cont'd)

• To find these documents, click on "Application Manuals and Forms" on the Housing Tax Credit homepage (<u>click here</u>)...





Application Manuals and Forms Publishing (cont'd)

- Click on "Documents posted for public comment" to see documents available for review during the 30-day public comment period.
- Documents that are finalized and ready for your use in application preparation are posted under "2023 Manuals and Forms"
 - 2023 Manuals and Forms
 - <u>2023 Scoring Documents and Data</u>
 - 2023 Pre-Application Forms

 - 2023 Architectural Manual and Forms 2023 Accessibility Manual and Forms <u>2023 Federal Compliance & Relocation Manual and Forms</u> • All other supplementary documents are forthcoming.



Application Manuals and Forms Publishing (cont'd)

 DCA can only guarantee consideration of comments received by the deadline posted by each document

Documents Posted for Public Comment



Edit

Submitting public comments

- <u>Click here</u> to submit public comments by the deadlines listed below.

2023 Manuals and Forms Open for Public Comment

- For the following documents, the public comments deadline is February 24, 2023:
 - <u>Relocation Manual and Forms</u>

The documents below associated with the 2023 QAP have been posted for public comment.



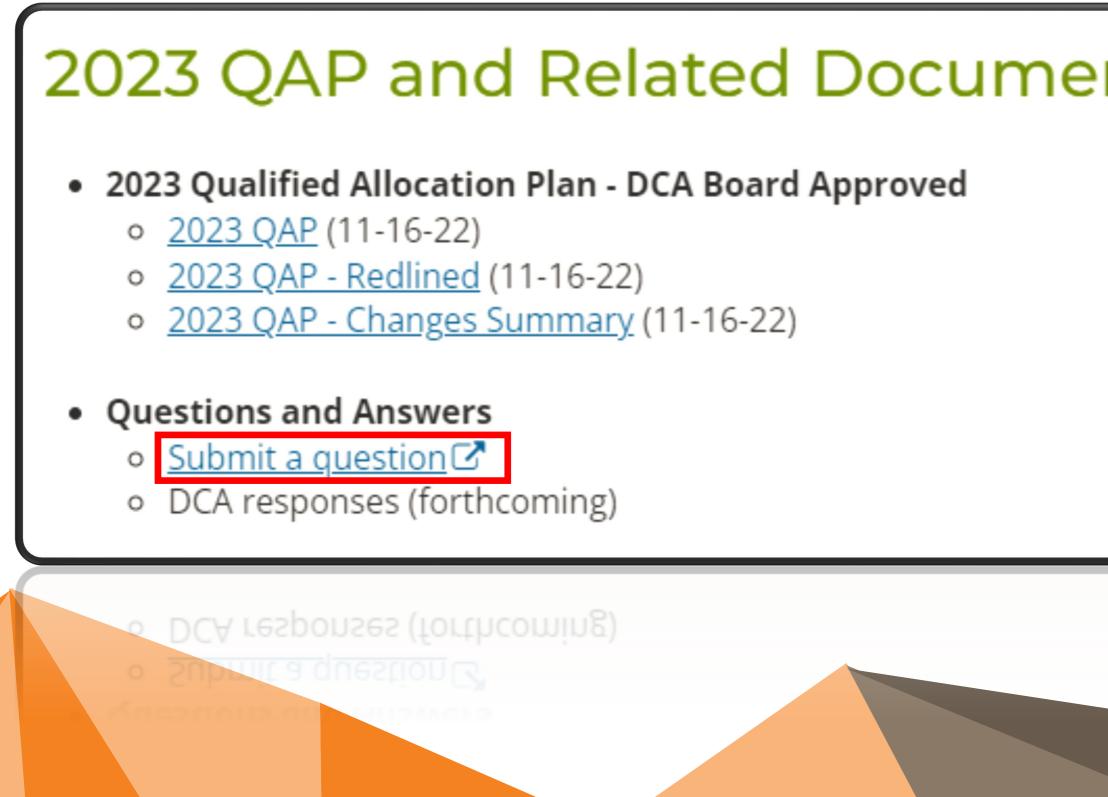
Q&A Process





Have a Question?

- Navigate to the "2023 QAP and Related Documents" page and select "Submit a Question".
- Please submit one question per topic. You may upload related documents.



Q&A Process

ents	Your Question
	Your Question
	Please limit each section to one topic (please see below to add another question).
	Please upload any file associated with your question.
	Additional files may be uploaded at the end of the survey.
	Do you have another Question?*
	О No О Ио
	Do you have another Question?* O yes





on the same website.

- The document will be updated regularly with new Responses, but there will not be an email blast for every update.
- Please check the site regularly for new and updated Responses. The Responses will be searchable by QAP Section.



Answers/Responses will be posted in a document linked under "DCA Responses"





Changes in Core Plan







Core Plan: Competitive Round Procedures



Competitive Round Overviews



Competitive Round Overviews

- Information describing the processes associated with competitive application evaluation were re-organized from the 2022 QAP to the 2023 QAP
- These changes were made to reflect current practice regarding:
 - Competitive allocation of 4%/Bonds resources
 - Separate competitions for applications proposing New Supply and Preservation





Competitive Round Overviews (cont'd)

- The following sections have been revised to cover the timeline, application requirements, etc. associated with each competitive process:
 - 9% Federal Credit Competitive Round
 - 4% Federal Credit Bond Financed Projects





Competitive Round Overviews (cont'd)

- Procedures that are distinct to 9% and 4%/Bonds Competitive Rounds are described in their respective sections
- Procedures applicable to both Competitive Rounds are described in (Core) **Plan) Competitive Application Reviews**
- "2023 QAP Changes Summary" on the DCA website (click here) provides more detail on how sections describing the competitive rounds were re-organized in the 2023 QAP



Application Designations



Application Designations

- Applicants indicate geography ("pools") and construction type in accordance with (Core Plan) Application Designations
- These designations:
 - ...apply to both the 9% and 4%/Bonds Competitive Rounds
 - ...were also used in the 2022 QAP*
 - *Some of the underlying terms were adjusted in the 2023 QAP. Please see (Core Plan) **Definitions** in the redlined QAP (click here).



Pre-Application Determinations



Pre-Application Determinations

- Most changes were clarifications, rather than substantive changes, added to address Q&A received under the 2022 QAP.
- Please note: Pre-Application is for any waiver, not just what is in the list.

A. All Applications

- applicability. Examples include but are not limited to:
 - Architectural standards waivers
 - Accessibility waivers
 - Underwriting waivers

Requests to waive any requirements listed in the QAP and documentation supporting the request. Please refer to all requirements in Threshold Criteria and Core Plan to confirm



Pre-Application Determinations (cont'd)

- (New) (Threshold) Occupied Developments required at Pre-Application
- If you are seeking points under option B. of (Scoring Criteria) Minorityand Women-Owned Business Engagement, the QB must be assessed at Pre-Application
- Submitting documentation for (Threshold) Experience, Capacity, and Performance is optional, but it is risky not to do so!
 - Applicants that receive this approval during the Full Application stage are at greater risk of receiving point deductions under (Scoring Criteria) Application
 Completeness



Core Plan: Material Policy Changes



4% Federal Credit – **Bond Financed Projects**



4%/Bonds Material Changes

- Most of (Core Plan) 4% Federal Credit Bond Financed Projects reflects practices already implemented in the 2022 4%/Bonds Competitive Round, either as DCA policy or implemented Georgia Code requirements
- Major changes in the 2023 QAP:
 - C. Application and Award Limitations
 - Award limitations exception for PHAs
 - D. Minimum Bond Allocations by Priority
 - "Broad distribution" based on Congressional Districts, not DCA Regions
 - \$30 million set aside for USDA Portfolio preservation



DCA Experience Award Limitation



DCA Experience Award Limitation

- What is the new awards limitation?
 - No more than one award per competitive round for Applications wherein the entity with "minimal experience" is the Certifying Entity.
- Which applications does this limitation apply to?
 - Any Application for which the Certifying Entity is comparatively new to developing Housing Credit properties in Georgia under DCA programs.



DCA Experience Award Limitation: Who does this apply to?

- If either of the following apply to the Certifying Entity, then the limitation applies:
- 1. The Certifying Entity is qualified based on the probationary process
 - See (Threshold) Experience, Capacity and Performance
- 2. ...or, the Certifying Entity has not demonstrated success in development,
 - ownership, and compliance for at least one DCA Housing Credit property
 - "Success" as determined by the "minimal experience" stipulations in (Core Plan) **DCA Experience Award Limitation**



Preservation Competition







Preservation: Core Plan & Threshold



Preservation: Eligibility



What qualifies as Preservation?

- (New) "Preservation" definition broadened in (Core Plan) Definitions. •
- Preservation is not solely about construction type.

- "Preservation" means either of the following: substantial rehabilitation of existing housing units demolition and reconstruction of housing units on the same site •





What qualifies as Preservation?

 Please note: as in 2022 QAP, qualification still depends on whether "Preservation" applies to the majority of units.

VIII. APPLICATION DESIGNATIONS

DCA applies the below Application designations to ensure policies can be adjusted to differing development contexts.

A. New Supply and Preservation Competitions

- units in the proposed development.

The 9% and 4% Credits competitions involve separate rankings based on the construction type (see "New Supply" and "Preservation" definitions). Applications proposing a mix of New Supply and Preservation will be assigned to a competitive ranking based upon which construction type applies to the majority of



Any units are New Supply? **Additional Requirements**

- requirements
- See (Core Plan) Definitions and (Threshold) Applicability of Threshold Criteria

"Municipality" means any incorporated city or town in the state.

"New Supply" means Applications proposing new construction or Adaptive Reuse

"NHTF" means the National Housing Trust Fund established by HUD.

- following requirements:
 - Site Zoning
 - Public Water/Sanitary Sewer Ο
 - **Operating Utilities**

If any units are new construction or adaptive reuse, applicants must meet certain New Supply

Applications proposing New Supply for all or some of the proposed units must meet the



Preservation: 9% Set Asides



New) 9% Set Asides: USDA-assisted Housing

- **9% credit limit**: \$1,105,000
- Please note PBRA requirement

Asides for more information

A. USDA-assisted Housing

- 2. Applications competing under the 9% Credits set aside only:
 - 0
 - At least one unit in each building, and 0
 - Ο

• Set Aside amount: One development preserving USDA 515 properties

See (Threshold Criteria) Eligibility For Credit Under the Preservation Set

1. This set aside applies to USDA Rural Development Section 515 assisted properties.

USDA-administered project-based rental assistance must support:

At least 50% of units overall, when considering all units across all buildings



9% Set Asides: HUD RAD

- (New) Changes to documentation requirements for developments utilizing
 - "RAD/Section 18 Small PHA "Blends"
 - Same documentation available in 2022 9% Round, but language was not in the 2022 QAP (guidance was published through Q&A)

B. RAD Set Aside Requirements

- For RAD/Section 18 Small PHA Blends:
 - RAD CHAP for the total number of public housing units to be repositioned, including both RAD and Section 18 units
 - Signed DCA Template: HUD Letter for RAD/Section 18 Blends
 - o Calculation of the RAD/Section 18 unit mix and rents the project is entitled to



Preservation: 4%/Bonds Round



4%/Bonds Preservation: Minimum Allocations

- 1:1 Ratio of New Supply and Preservation awards (approximate)
- (New) "Portfolio" Preservation of USDA Housing
 - \$30 million bond allocation set aside





4%/Bonds USDA Portfolio: Requirements Exception

- USDA Portfolio Applications can meet Environmental Requirements at the Full Application stage.
 - All other 4%/Bonds applications must meet Environmental Requirements at the Competitive Review Submission stage.
 - See (Threshold) Applicability of Threshold Criteria



Scoring Criteria: General

Changes, Updates, Common Issues





Documentation and Justifications

External Data Sources



External Data Sources: QAP Changes

- Clarifies that, for all scoring sections using external data, the most up-to-date data as of November 1, 2022 should be used. If newer data is published, applicants may use it.
 - However, only use data if DCA has publicized that it is eligible. If you think a data source needs updating, submit a question through Q&A.

B. External Data Sources

that is administered by entities other than DCA:

- By default, Applications qualify for points based on the most up-to-date information • available as of November 1, 2022.
- If updates are conducted between this date and the Application Submission Deadline, the Applicant may claim points based on either the original or updated data.

Unless specified otherwise within the section, the following applies for any Scoring Criteria data



Applicability of Scoring Criteria



4%/Bonds New Supply: Site Scoring Points Limit

- (New) Site-based scores in 4%/Bonds round capped at 33
- Why did DCA make this change?

Competition

Applicants may claim points in any of the below Scoring Criteria related to site characteristics. However, no more than 33 points overall from these criteria will contribute towards the Application score:

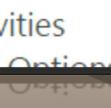
Desirable/Undesirable Activities Community Transportation Option

Desirable/Undestrable Activities

This imposes a point limit equal to the 22 QAP 4% "points maximums"

This approach opens opportunities for more sites, while equally meeting DCA's priority to maintain some separation between 9% and 4%/Bonds site selection

B. Site Characteristics Scoring for 4% Credits/Bonds New Supply





Tiebreaker Information



(New) Tiebreaker Information

- For most tiebreakers, DCA staff break ties based on information that is readily available without the applicant needing to provide specific information (e.g., "First selected Application for the Project Team...")
- For two new tiebreakers, DCA requires the applicant to provide additional information to implement:
 - "Readiness to Proceed for 4%/Bonds Applications"
 - "Preservation Priority"



Tiebreaker Information (cont'd)

- For both "Readiness" and "Preservation Priority," it is a priority for DCA to differentiate applications, but doing so through additional "Scoring" or "Threshold" sections presents significant risks.
- Tiebreakers allow DCA to consider these priorities on a qualitative basis and only in instances in which "all else is equal" between applications.
- Applicants should interpret this section as the opportunity to "make your pitch" and submit any evidence that substantiates your pitch



Preservation Scoring Criteria

Changes, Updates, Common Issues





Note: Scoring for Multi-building Preservation Applications

- (New) In various Preservation Scoring Criteria, new provisions clarify how to score if multi-building development.
- Example: (Scoring) Occupancy: "...[for] Preservation of multiple buildings, occupancy will be based on the average for all buildings."



Rent Advantage



(New) Rent Advantage

- Purpose: competitive advantage for communities where rent limits are comparatively lower relative to market rents
- Applicable to both 9% and 4%/Bonds Preservation competitions
 - (not applicable to the USDA Portfolio Set Aside)
- This is a community-level analysis (not property level):
 - Analysis compares the 60% Housing Credit rent limit to market rents
 - Existing rents at property and proposed rents <u>do not</u> impact this analysis



Rent Advantage: Process

- DCA commissions a Preliminary Rent Analysis letter
- Based on same process used in <u>2020 HOME and NHTF NOFA</u>
- Process:
 - Applicants indicate whether seeking points under this section in application
 - DCA works directly with appraisers to confirm consistent methodology and assign applications
 - Appraisers return letters to DCA during competitive round
 - Applicants reimburse appraisers directly during competitive round



USDA Portfolio: Additional Scoring Criteria



(New) USDA Portfolio Additional Criteria

- purposes only
- Vacancy rates based on US Census data
 - - 3rd-party data used in Scoring

A. Geographic Distribution – 10 points

Applications receive 1 point for each county that a USDA property associated with the Application is located in, up to 10 points.

Two new Scoring options added for USDA Portfolio competition

See (Scoring) Documentation and Justifications for notes regarding

B. Severe and Critical Need – 6 points

Average housing vacancy rate for the counties represented falls in one of the tiers below. Vacancy rate is as determined by DCA staff calculations.



Occupancy



Occupancy: Common Issues

- Minimum Documentation missing one or more of the following:
 - Table showing 24 consecutive months of occupancy rates ending two (2) months prior to application submission deadline.
 - 24 consecutive months of rent rolls substantiating the occupancy rates table • The end of the 24-month period is 2 months prior to Application
 - Submission Deadline





Occupancy: Common Issues (cont.)

• Occupancy Percentage must match the submitted rent rolls, with the accurate vacant units reported.





New Supply Competition







New Supply Scoring Sections

Changes, Updates, Common Issues



Desirable/Undesirable Activities





Common Issues

- Entering geo-coordinates
 - When filling out certification, double-check geo-coordinates using a map service
- Eligibility for Item C: Supermarket/Grocery Store
 - Gas stations or convenience stores do not count
 - Must provide meat, dairy, and produce
 - If the site is in a USDA Food Desert and does not have a qualifying Item C amenity in range, counted as Undesirable Activity



Community Transportation Options (CTO)



Community Transportation Options: Common Issues

- Transit service PDF website page missing one or more of the following:
 - URL
 - Cost of Service
 - Route schedule (not applicable to on-call options)
 - Relevant transit schedule (not applicable to on-call options)
 - Confirmation that the service is available on-site at the proposed development (not applicable to fixed-route options)
- A letter from transit agency (contact name, phone number and email address) is required if the PDF <u>does not</u> include all items listed.



Community Transportation Options: Reminders

- On-call transportation services are not eligible for points in the Atlanta Metro Pool.
- DCA will measure required distances from the geo-coordinates of a pedestrian site entrance to the proposed transit stop.
 - Make sure geo-coordinates on scoring justification match Emphasys geo-coordinates, minimum documentation
- Service must be publicized to the general public via website or published brochure/available to all residents



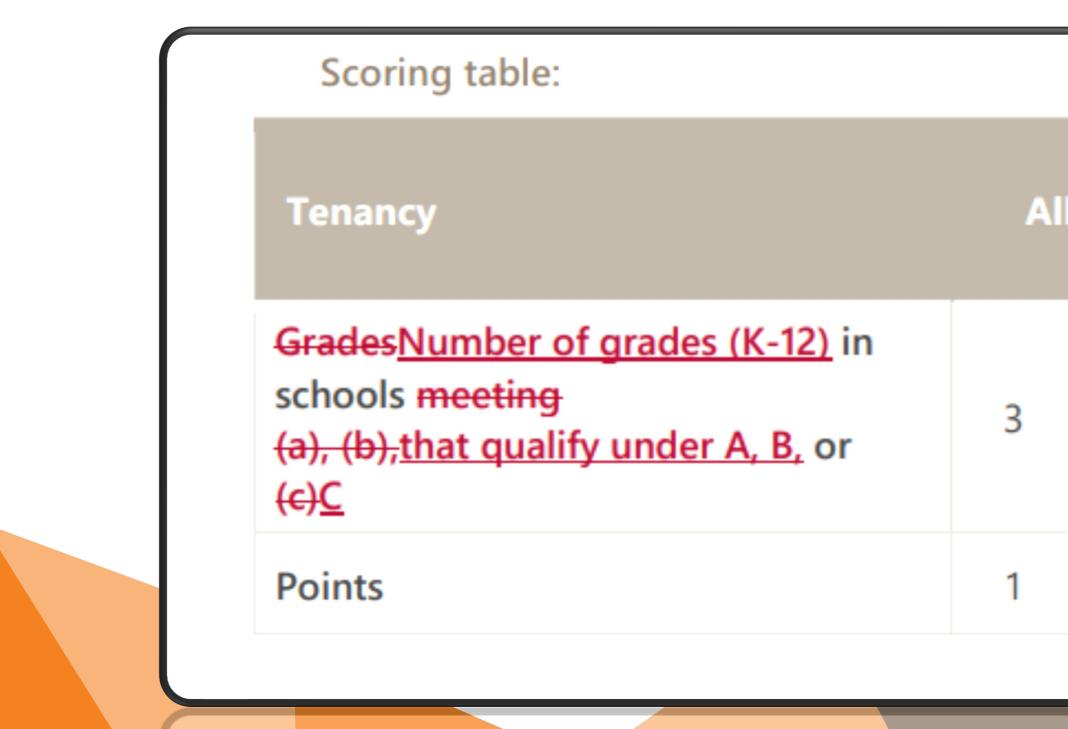


Quality Education Areas



Quality Education Areas: QAP Changes

Pre-K)





Clarification that only grades K-12 should be counted when calculating points (not

l t	enancies	HFOP, Elderly, Other	Family
	7	All K-12	All K-12
	1.5	2	3



Quality Education Areas: Data Updates

- COVID-19, there are no new overall CCRPI scores from 2022.
- DCA has posted:
 - Scoring Instructions
 - Option C Scoring Data
- Scoring data for this section remains nearly the same, except:
 - calculated, due to a Q&A on the topic.
 - This year, there is only one methodology for Option C (next slides)

Due to continuing Dept. of Education data collection limitations resulting from

• Option C: Last year, there were two methodologies with which Option C data could be

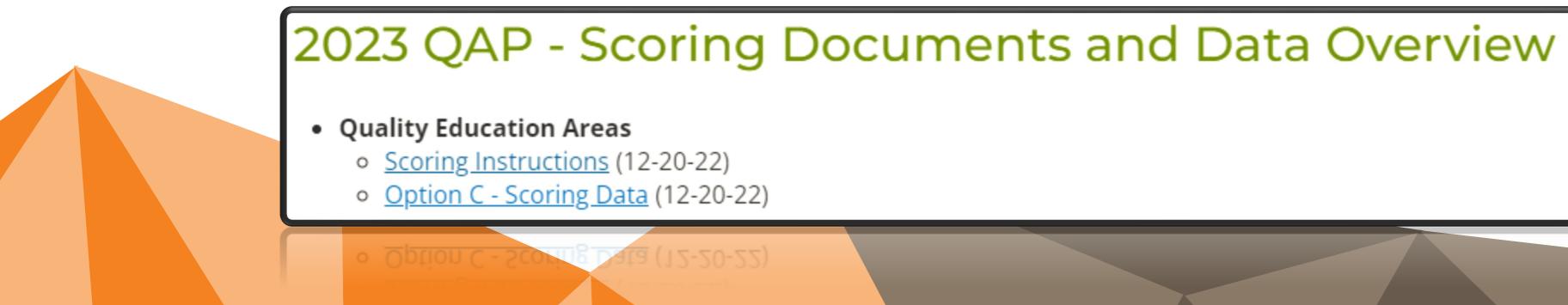


Quality Education Areas: Data Updates

Option C Scoring Info:

- School meets both of the following:
 - Average year-over-year change in CCRPI score between 2015 and 2019 is positive (excluding) changes between 2017 and 2018, due to CCRPI methodology adjustment).
 - Average CCRPI score over the same time period is in the top 75% of all statewide average scores for the grade cluster.

To see if school qualifies through Option C:





Quality Education Areas: Data Updates

To see if school qualifies through Option C:

2023 QAP - Scoring Documents and Data Overview

- Quality Education Areas
 - Scoring Instructions (12-20-22)
 - Option C Scoring Data (12-20-22)

Please only use the 2023 data workbook published.

ſ						
				School or Grade Cluster Identifiers		CCRPI Scores Quali
	System 👻	System Name	School I -	School Name	▼ Grade Clust ▼	Under Option C?
	601	Appling County	0103	Appling County High School	Н	Yes
	601	Appling County	0177	Appling County Elementary School	E	Yes
	601	Appling County	0195	Appling County Middle School	M	Yes
	601	Appling County	0277	Appling County Primary School	E	No
1	601	Ap <mark>pling County</mark>	0277	Appling County Primary School	E	No
			CGT0	Appling county ivilable school		



Quality Education Areas: Common Issues

1. Reminder on school qualifications:

For a school to qualify it:

- cannot have district-wide enrollment unless the school is the only school in the district;
- must serve grades between Kindergarten and 12th grade; and
- cannot conduct student admission on a selective basis (e.g., lottery, competitive application).

2. Charter Schools:

- Please include minimum documentation if claiming points for a charter school.
 - residents in the attendance zone are able to attend as of right.

 For each charter school, a letter from a charter school system representative not more than six (6) months old confirming that admissions is not conducted on a selective basis, that



Quality Education Areas: Common Issues

- 3. Point calculations:
- Do not count Pre-K in self score
- Each grade may only be counted once.
 - 5th grade may only be counted once for purpose of calculating total score.

Scoring table:
Tenancy
Number of grades (K-12) in schools that qualify under A, B, or C
Points

• For example, if qualifying Elementary School serves K-5 and qualifying Middle School serves 5-8,

All tenancies		HFOP, Elderly, Other	Family
3	7	All K-12	All K-12
1	1.5	2	3



Quality Education Areas: Common ssues

4. Please indicate location of proposed development on school zone map. 5. Please ensure scoring justification, scoring table, and documentation match.

Complete all blue cells for each school	. Leave unused college and Caree	a Readiness Performance index (CCF	ven cens empty.	
Sort by grade group.			Opt	tion C
	 A) Average of College and Career Readiness Performance Index (CCRPI) 	B) School Receives 2018 or	Average year-over-year change in CCRPI score between 2015 and 2019 is	Average of 2015-2019 CCRPI
School Names per CCRPI	scores posted since 2018 are above state average?	later "Beating the Odds" Designation?	positive (excluding change between 2017 and 2018)?	scores is above applicable threshold?
Scoring Justification per Applicant				



Revitalization/ Redevelopment Plans



Revitalization/Redevelopment Plans: QAP Changes

- - Under 2022 QAP, 4% Applicants could only claim points in Subsection A

VIII. REVITALIZATION/REDEVELOPMENT PLANS

Up to 7 Points

Applicants are ineligible to claim points in Revitalization/Redevelopment Plans if claiming points in Stable Communities or Community Designations.

9% Applicants may claim points in A and/or B. Eor 4% Applications only subsection A applies.

Both 4% and 9% Applicants may claim points in Subsection A (Revitalization) Plan/Qualified Census Tract) and/or B (Third-Party Capital Investment)



Revitalization/Redevelopment Plans: QAP Changes (Subsection A)

- Community Revitalization Plan (CRP) requirements: "Clearly delineate one targeted area within a Local Government Boundary
 - (LGB)..."

 - CRPs are ineligible if they target multiple areas, or multiple LGBs. • CRPs should show targeted investment in the one area around the development
 - Minimum Documentation:
 - Local Government financial commitment may be reflected in CRP rather than obtaining a letter



Revitalization/Redevelopment Plans: QAP Changes (Subsection B)

• For Rural Pool applications, the applicable radius for eligible third-party



proposed site;

proposed site;

capital investments has increased to 1 mile (Metro Pool still 0.5-mile radius).

Up to two (2) points if a foundation, trust, business and/or government not qualifying as a Related Party designates an investment of resources that will result in an off-site place-based

is within a <u>1-mile radius (for the Rural Pool) or 0.5-mile radius (for the Metro Pools) of the</u>



Revitalization/Redevelopment Plans: QAP Changes (Subsection B)

- Point calculations: Applicants may claim points based upon either the total investment amount or an applicable amount per unit.
 - Under 2022 QAP, calculation based on amount per unit only.



Applications will earn points according to the following scale of investment amount within the applicable radius of the proposed site.

Applicants have the option to claim points based either on an investment amount per unit or overall investment amount, as indicated in the below tables:

Investment Amount Per Unit						
Atlanta Metro	\$20,000 to \$29,999	At least \$30,000				
Other Metro	\$15,000 to \$24,999	At least \$25,000				
Rural	\$10,000 to \$19,999	At least \$20,000				
Points	1	2				

Points by Amount							
Greater than: Less than or equal to:	\$500,000 \$1 million	\$1 million \$2 million	\$2 million \$4 million	\$4 million (N/A)			
Points	.5	1	1.5	2			



Revitalization/Redevelopment Plans: Common Issues

- 1. CRP eligibility
- Targeted area must qualify
- Official approval/re-approval within 10 years of **Application Submission**

A. Revitalization Plan/Qualified Census Tract – 5 Points

considered Community Revitalization Plans (CRPs): Local Government Boundary. Discuss housing as a goal of the CRP.

- Application Submission.

A document is ineligible for consideration as a CRP if it is a short-term work plan, comprehensive plan, consolidated plan, municipal zoning plan, or land use plan.

Submitted revitalization/redevelopment plans must meet the following requirements to be

Clearly delineate one targeted area within a Local Government Boundary that includes the proposed site. For applications in a Metro Pool, the targeted area must not encompass the full

Include an assessment of the targeted area's existing infrastructure.

Designate implementation measures.

Be officially approved or re-approved by a Local Government within ten (10) years of

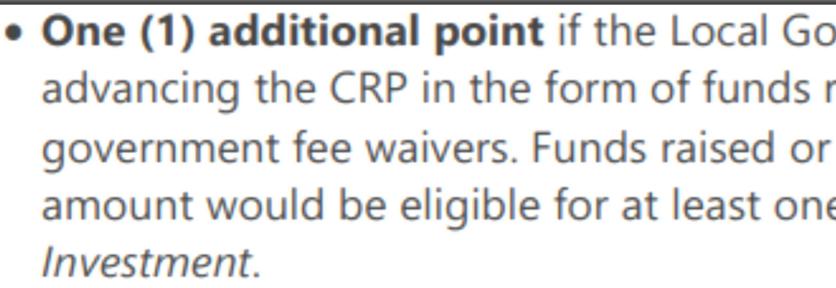
plan, consolidated plan, municipal zoning plan, or land use plan.

A document is ineligible for consideration as a CRP if it is a short-term work plan, comprehensive



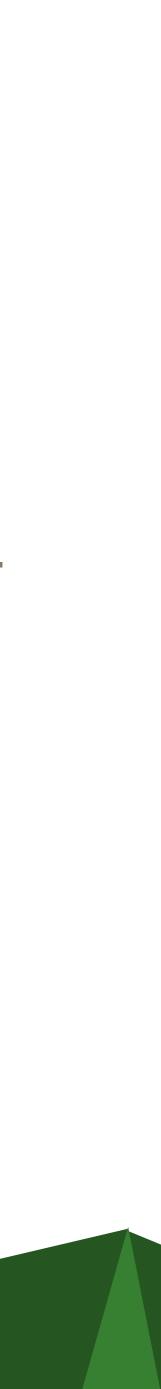
Revitalization/Redevelopment Plans: Common Issues

- 2. Local Government financial commitment:
- Please ensure amount of financial commitment is specified, whether in CRP itself or in letter.
- Need to see actual commitment of funds
- If using Tax Allocation District for these points, ensure the TAD is clearly connected to CRP/its area
- If the commitment is reflected in the CRP, please highlight in CRP



restment.

• One (1) additional point if the Local Government demonstrates financial commitment to advancing the CRP in the form of funds raised, funds allocated, tax incentives, or local government fee waivers. Funds raised or allocated are only eligible for this point if the amount would be eligible for at least one (1) point under subsection B. Third-Party Capital



Revitalization/Redevelopment Plans: Common Issues

- 2. Third-Party Capital Investment
- documentation (highlighting is helpful).

Minimum Documentation:

- investment, and timeline for completion.
- Description and location of improvements on site map.

pescription and location of improvements on site map.

Please ensure source, amount, and timeline of investment is clearly shown in

Evidence from the unrelated 3rd party demonstrating source of investment, amount of



Community Transformation



Community Transformation: QAP Changes

• The definition of "Defined Neighborhood" has been edited:

- For Metro Pool applicants, the Defined Neighborhood can't encompass a full Local Government Boundary (for Rural Pool applicants, this is ok).
- This matches the requirements for a "targeted area" in Revitalization/Redevelopment Plans section.

Defined Neighborhood: a targeted area that includes the proposed site but does. For applications in a Metro Pool, the defined neighborhood must not encompass the entire surrounding city, municipality, or countyfull Local Government Boundary. If the Local Government has adopted a Community Revitalization Plan (CRP), the Defined Neighborhood should align or fall within the targeted area of the CRP.

targeted area of the CRP.

Community Transformation: Common Issues

- 1. Defined Neighborhood: If Metro Pool, Defined Neighborhood should not be entire city.
- 2. Community Quarterback Board documentation
 - Signatures
 - At least 1/3 must be residents
- At least one-third must be residents of the Defined Neighborhood who self-certify their income at less than 80% of AMI, other individuals who self-certify their income at less than 80% of AMI, or elected representatives of neighborhood organizations serving the Defined Neighborhood.
 - Minimum Documentation:
 - the CQB.
 - the CQB.

• Signatures from representatives listed under item B1 indicating commitment to serve on

Letter from each CQB representative listed under item B2 stating commitment to serve on

• A completed Community Transformation Plan Certificate.

eted Community Transformation Plan Certificate



Stable Communities



Stable Communities: QAP Changes (Subsection A)

• Clarification on availability of FFIEC data:

If no data exists for their census tract, applicants may use FFIEC data for the nearest census tract that has data available.



Stable Communities: QAP Changes (Subsection A)

- Option 5: The eligible income threshold for Rural Pool applications has been expanded to allow for poverty levels up to 30%.
 - 5. demographics according to the most recent FFIEC Census Report (http://www.ffiec.gov/census/).
 - a) Poverty level (see Income):
 - Metro Applications: less than 15% below Poverty level
 - Rural Applications: less than 2030% below Poverty level
 - Designated Middle or Upper Income level (see Demographics)

Designated Middle or Upper Income level (see Demographics)

Three (3) points to Applications that are located in a census tract that meets the following



Stable Communities: QAP Changes (Subsection B)

- The Life Expectancy indicator has been removed.
 - Data not updated since 2015
 - maximum total for the section from 10 to 9 points.



This changes to maximum number of points for Subsection B from 5 to 4, also changing the

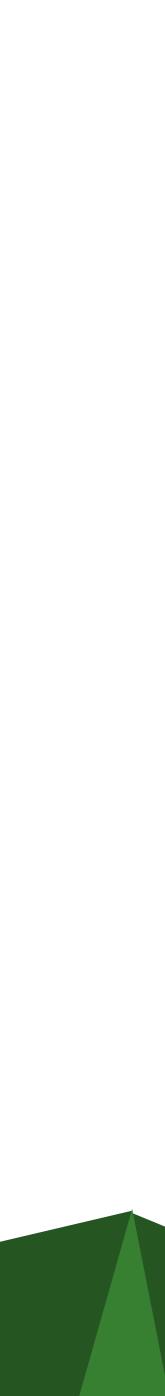


Stable Communities: Data Updates

- DCA has posted Health and Economic Indicators Table to be used for Subsection B.
 - Nov. 1, 2022 and Dec. 8, 2022
 - All applicants should now be using their 2020 census tract, not 2010.

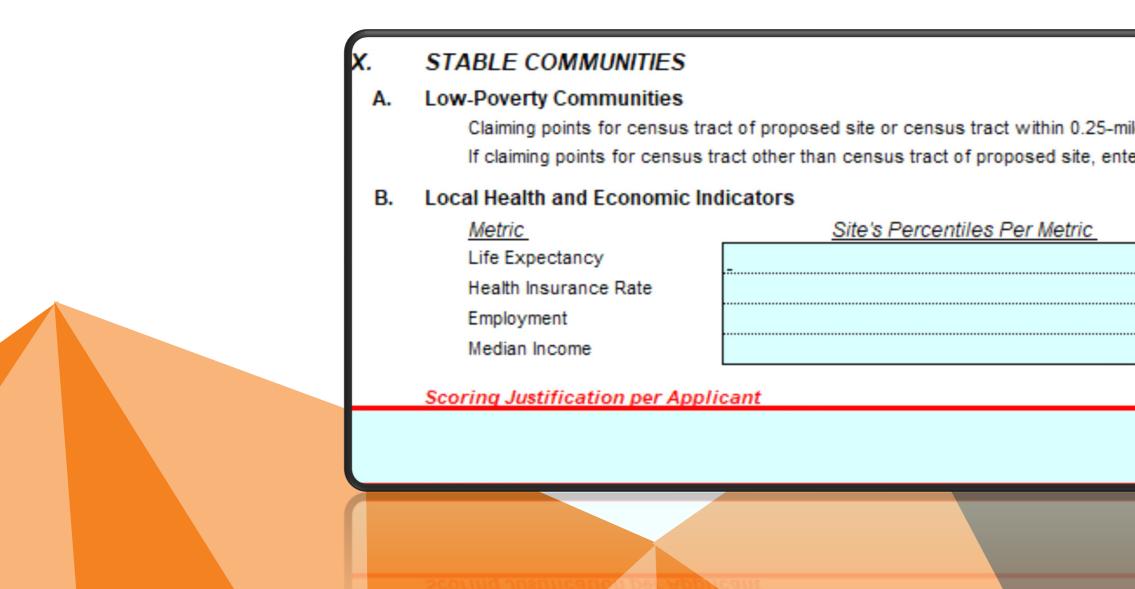


Only eligible years for data are 2020 and 2021 (these are the most up-to-date years as of



Stable Communities: Common Issues

- 1. Nearby census tract data:
- Subsection A: if using nearby census tract (within 0.25-mile), be sure selected point option matches.
- Subsection B: Applicants cannot claim points for a nearby census tract if data is available for their census tract.
- 2. Make sure scoring table matches justification





			10 5	0 0 A.
e radius?	<< Select >>]
r census tract number:]
			5	В.
Data Set Used?	Site's Percent	<u>iles Per Metric</u>		
N/A				
·	•			



Previous Projects



Previous Projects: QAP Changes

Minimum Documentation: added documentation for annexation

Minimum Documentation:

If annexation has occurred which impacts point eligibility for this section, and current boundaries are not reflected on DCA's Housing Tax Credit Properties Map, Applicants must submit documentation of annexation.





Previous Projects: QAP Changes

- Expansion of exemption: Developments previously awarded under any Preservation Set-Aside are not included in the analysis of previous competitive funding cycles.
 - Housing Tax Credit Properties map has been updated to show Preservation Set-Aside awards that can be excluded from this analysis (next slides)

competitive funding cycles.

Rural HOME Preservation set aside funded Applications are not included in the analysis of previous

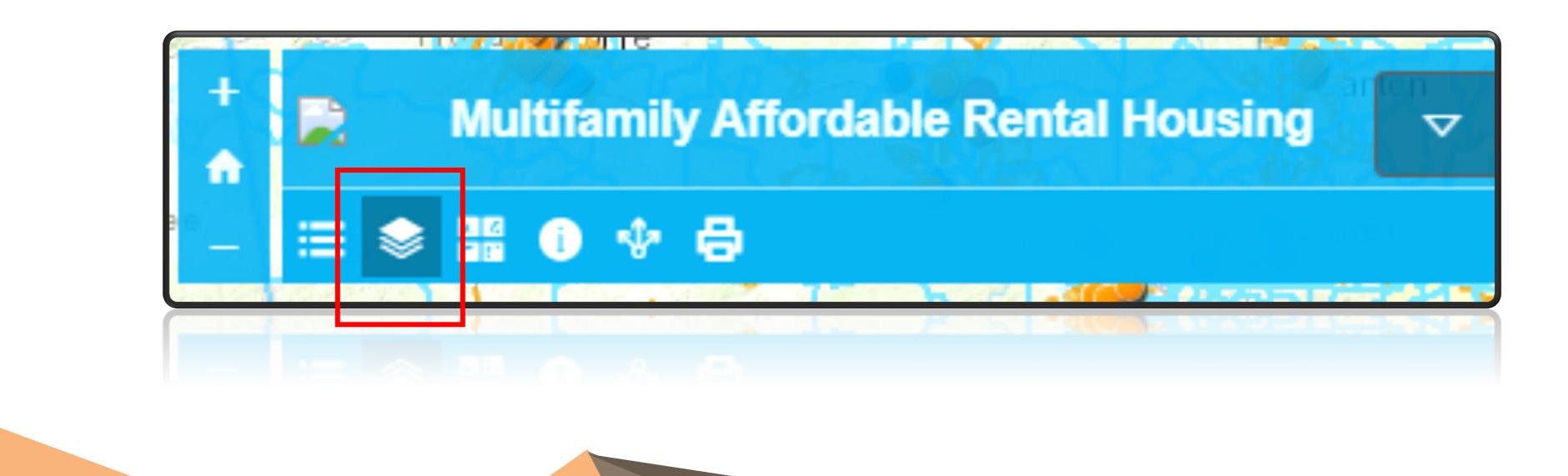




- The Housing Tax Credit Properties map shows 2020 census tracts and 2020-2021 Stable Communities data only.
- Data has been updated to show 2022 9% awards
- Preservation Set-Asides is a new layer



To view Preservation Set-Aside developments: 1. Select "Layers" function on top left



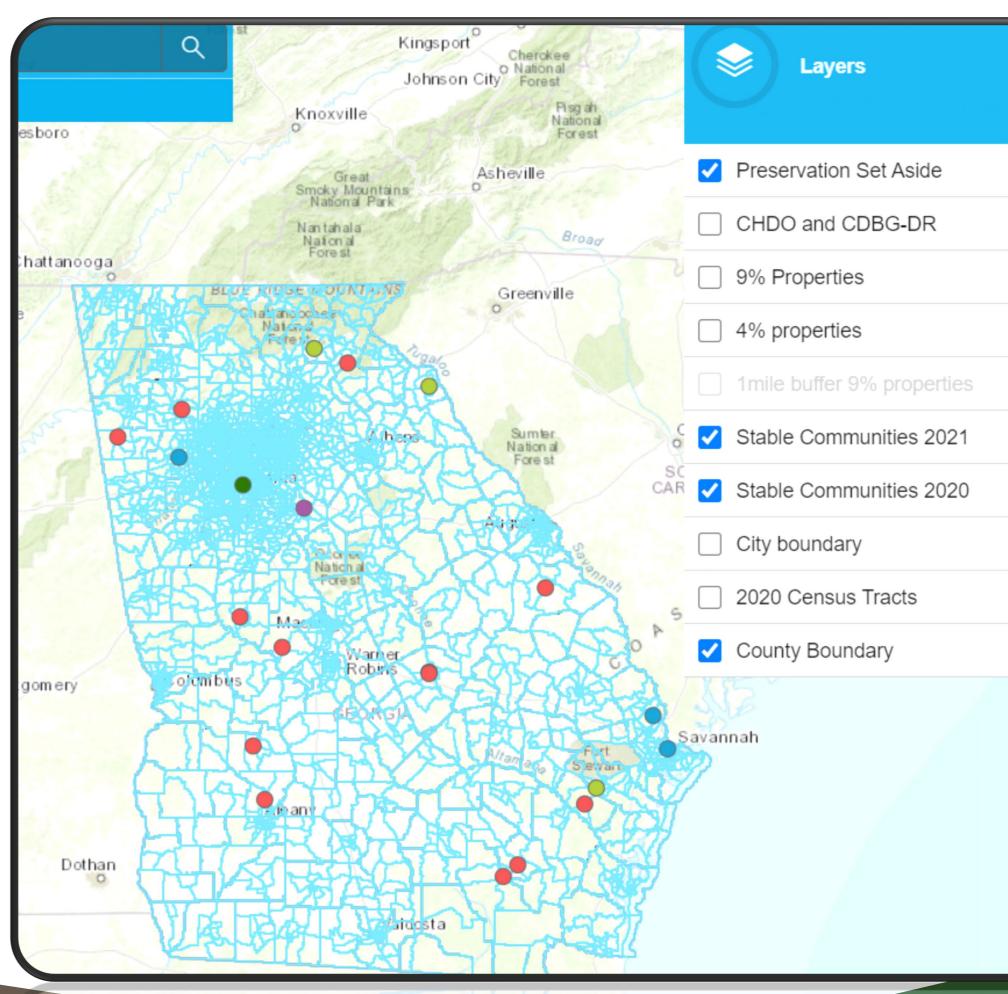


To view Preservation Set-Aside properties (cont.):

2. Check and uncheck layers as desired to view **Preservation Set-Aside properties**

3. Click arrow next to Preservation Set Aside layer to view legend (below)

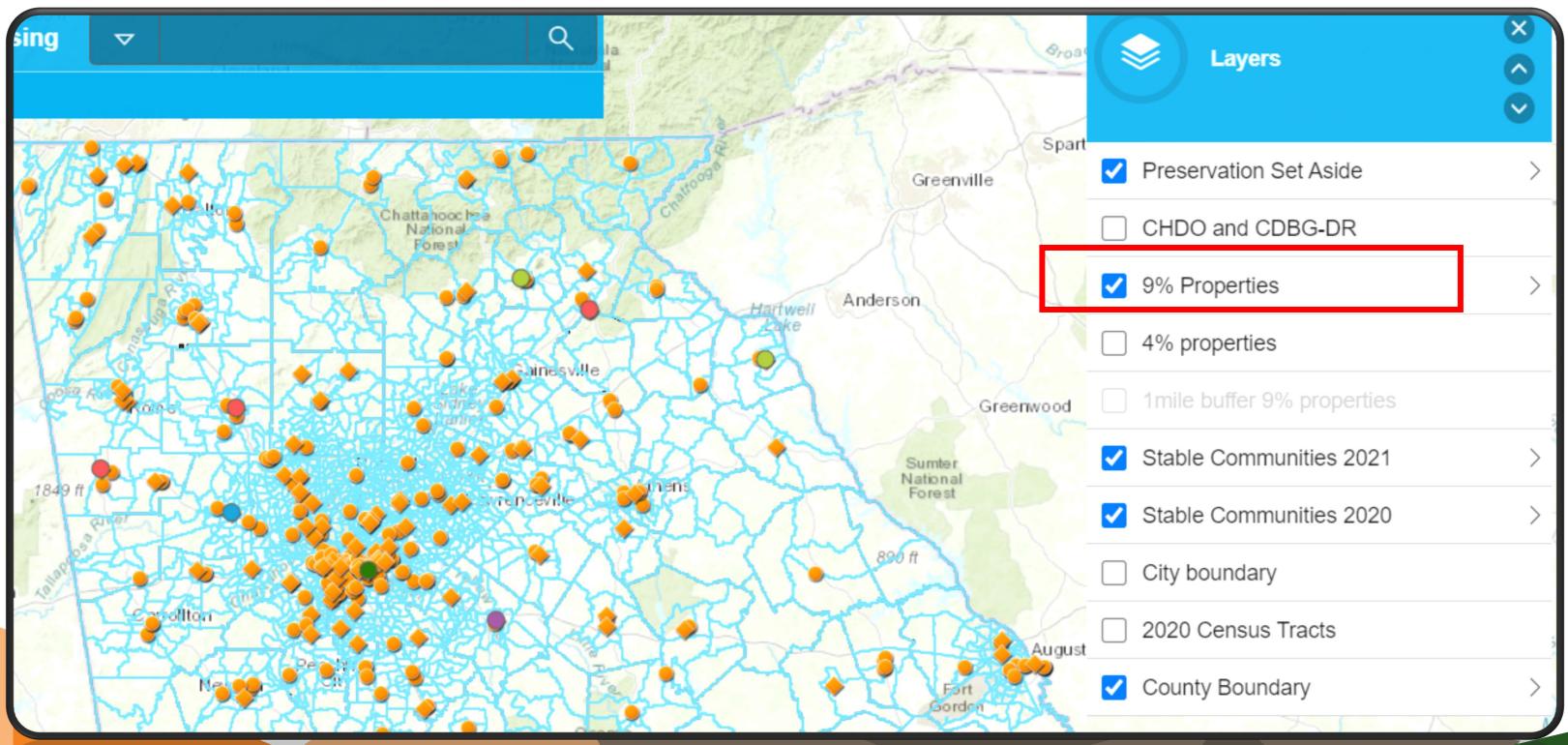
ſ	Prese	ervation Set Aside	\sim	
	Legend	Opacity		
	e Ru	ural HOME		
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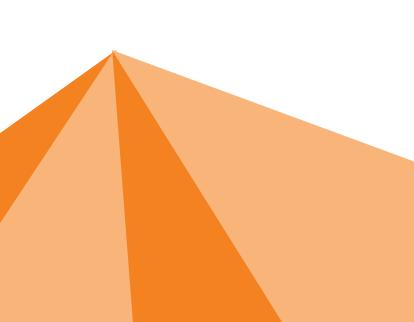




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To view Preservation Set-Aside properties (cont.): 3. To view property information for a Preservation Set-Aside, you must also have the "9% Properties" layer checked.





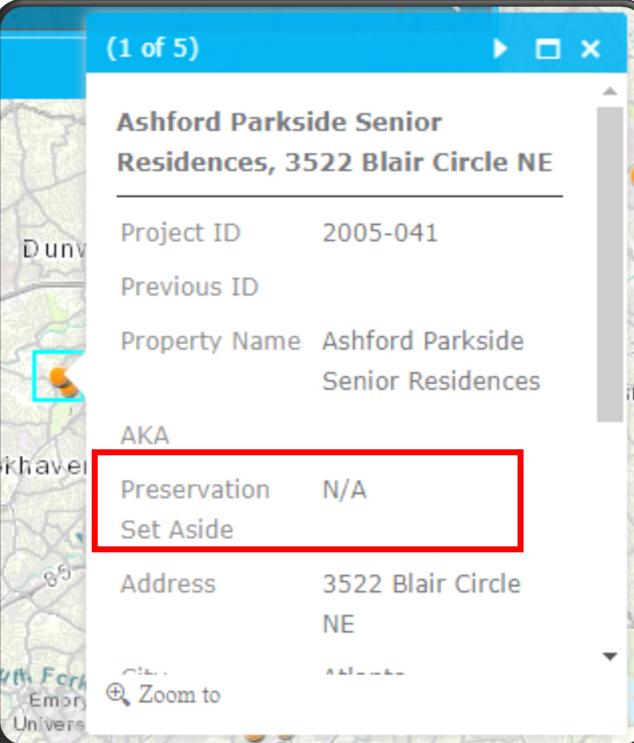
County Boundary



To view Preservation Set-Aside properties (cont.):

- 4. When you click on a 9% property, you will see a category for "Preservation Set Aside."
- If property is Preservation Set Aside, it will list which one, and you do not need to count this property for analysis of Previous Projects section.
- If property is not Preservation Set Aside, it will say "N/A," and you do need to count this property for analysis of Previous Projects section.

	(1 of 6)		×			
Per	East Lake HR Pres, 380 Eva Davis Way					
X	Project ID	2021-020				
1	Previous ID					
	Property Name	East Lake HR Pres				
	АКА					
F	Preservation Set Aside	RAD				
5	Address	380 Eva Davis Way				
ey	€ Zoom to	<u>^</u>	•			







Previous Projects: Common Issues

Be sure to consider all developments within the relevant buffers for Applicant's development pool.







DCA Community Initiatives



DCA Community Initiatives: Common Issues

If working with a GICH team, make sure they confirm that their team contact information is up to date with GICH/UGA (for Minimum Documentation purposes).

Minimum Documentation:

Submission, committing the formal support of the majority of GICH members.

 Letter executed by the GICH community's primary or secondary contact on record with the University of Georgia Housing and Demographic Research Center as of Application



Integrated Supportive Housing





Integrated Supportive Housing: Common Issues

Subsection A: Tenancy must be Family





Integrated Supportive Housing: **QAP Changes (Subsection B)**

Minimum Documentation must show that the PBRA is intended to provide supportive housing for individuals with disabilities (changed from "serve individuals with disabilities").

> Minimum documentation: Evidence from the funding provider substantiating that the PBRA units are intended to serveprovide supportive housing for individuals with disabilities.



Integrated Supportive Housing: Common Issues

Subsection B: Evidence must:

- Be from the funding provider



Show intent to provide supportive housing for individuals with disabilities



Integrated Supportive Housing: **QAP Changes (Subsection C)**

Tenant Selection Preference:

but preference is still required.

PHA must agree to tenant selection preference as stated in first paragraph of section. Percentage often not listed in PHA Administrative Plan, so requirement removed from minimum documentation,



Integrated Supportive Housing: **QAP Changes (Subsection D)**

DCA Section 811 Commitments: Prior Performance

- Applicants automatically receive 2 points
 - If DCA identifies issues, DCA will notify Applicant at least 120 days before Application deadline and communicate corrective steps.













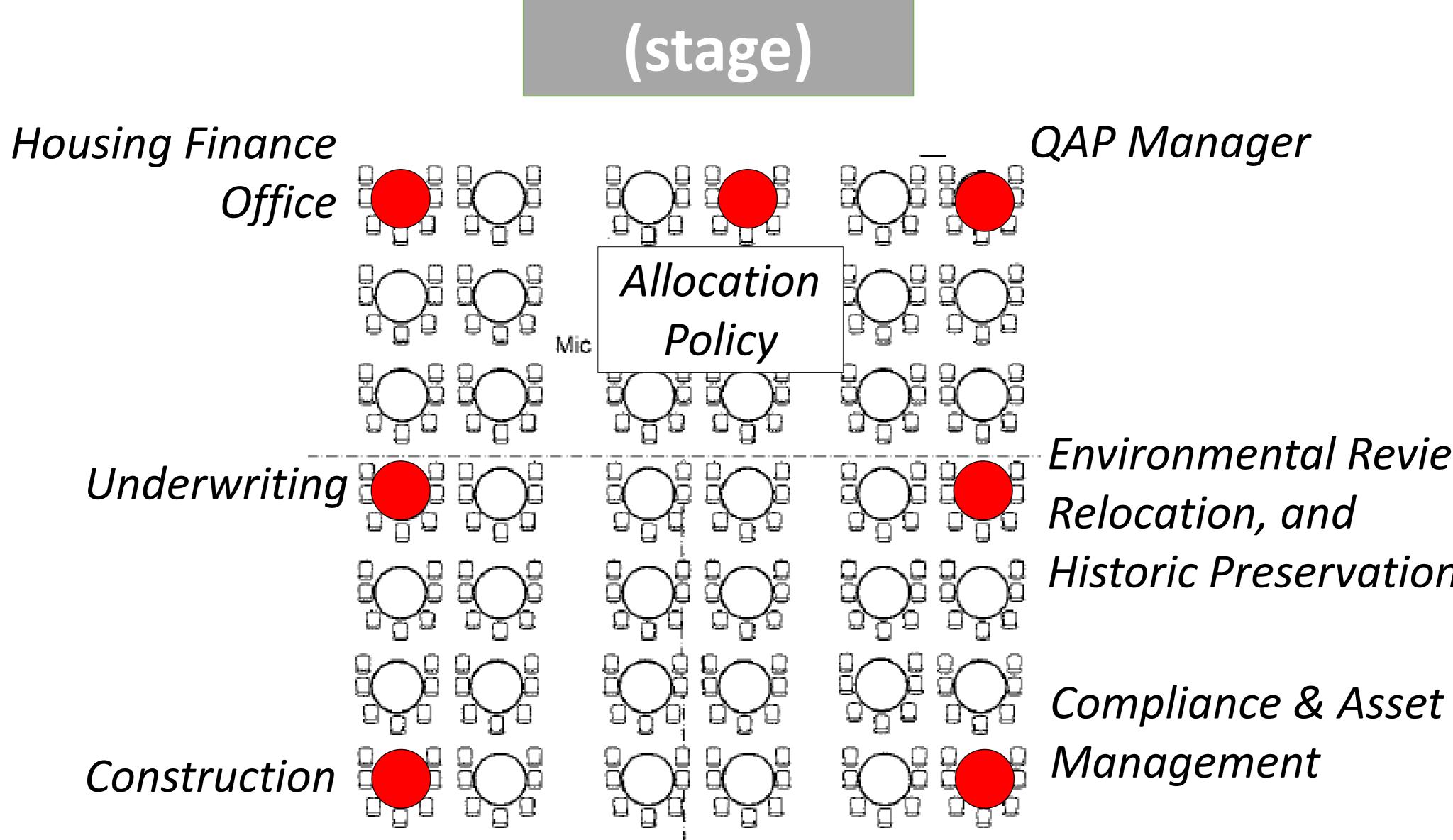


Breakout Sessions









QAP Manager

Environmental Review, Relocation, and **Historic Preservation**

Report-Outs and Q&A













