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**2021 9% Competitive Round**

**Questions and Answers**

Published February 18, 2021.

The pages that follow are DCA responses to questions pertaining to the 2021 9% Credits Competitive Round.

## Submitting Additional Questions

Questions must be submitted through the online 9% Competitive Round Q&A Survey hosted on the 2021 QAP and Related Documents webpage ([click here](https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/housing-tax-credit-program-lihtc/qualified-0/2021)).

* If you have issues using the survey, please email hfdround@dca.ga.gov.
* There is no separate option for “project-specific” questions. Currently, all questions go through the same approval and publication process.
* Given the volume of questions submitted, please expect at least a 2-week delay between submitting a question and seeing an answer posted to the website.

## Deadline to Submit Questions

The deadline to submit questions is Monday, April 26, 2021. This deadline is to ensure that all applicants have sufficient time to react to posted DCA responses before the May 21st application submission deadline.

After this deadline, DCA will only respond to questions pertaining to the mechanics of application submission (e.g., issues accessing the online application portal).

## Q&A Document Update Process

DCA will update the Q&A document in small, incremental response sets. As this will increase the number of updates to the document relative to prior years, DCA will not send an email notification each time the Q&A document is updated.

Please monitor the “Updated” date by the Q&A document on the DCA website to track when DCA has released additional responses. By default, the table below will be sorted such that the most recent responses are at the top.

## Navigating the Q&A Table

The below table, as posted to the DCA website, is sorted in descending order by date posted. If preferred, the document can also be sorted by category (in Microsoft Word, select the full table, select “Home” 🡪 “Sort”, under the Paragraph section).

Below are the category breakdowns in the Q&A table:

* 1-Core Plan; [*section number and name*]
* 2-Threshold; [*section number and name*]
* 3-Scoring; [*section number and name*]
* 4-Compliance Appendix
* 5-Manuals
* 6-Emphasys Application Portal
* 7-Application Materials (Forms, etc.)
* 8-Other

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| **Date****Posted** | **Category** | **Question and Answer** |
| 2/18/21 | 1-Core; 13-Financing Resources – HOME Loans | **Question:** **Q0121\_01**Can you direct me to the CHDO Certification Application that is due at the time of Pre-Applications?**Answer:**Per the 2021 QAP, “DCA will select developments for purposes of [the CHDO] set aside through a Notice of Funding Availability announced as funds become available.” CHDO HOME funds are not allocated through the summer 9% Competitive Round. The 9% Competitive Round Pre-Application deadline is not applicable to any CHDO documentation submission requirements. CHDO HOME funds are allocated towards rental housing development through Notices of Funding Availability (NOFAs) that pair HOME funds with 9% Tax Credits. An organization’s CHDO status is confirmed during the NOFA application review process. Organizations interested in assessing CHDO eligibility in advance of a NOFA release should review HUD guidance on CHDO status ([click here](https://www.hud.gov/sites/documents/19787_CH03.PDF)) and the DCA form used to confirm CHDO status during the most recent CHDO NOFA ([click here](https://www.dca.ga.gov/sites/default/files/2017_chdo_certification_application_0.docx)). Please note that the DCA CHDO form is for reference only and may differ from what is utilized in a future NOFA. [Click here](https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/housing-tax-credit-program-lihtc) to subscribe to the email list where CHDO NOFAs are publicized (click “Join our email list”). |
| 2/18/21 | 1-Core; 18-Evaluation of 9% Tax Credit Competitive Applications | **Question ID**: **Q1217\_02** Please clarify the tiebreaker (b), “Earlier year of the most recent 9% Credits award for the Local Government Boundary” from Core Plan, Section 18. Evaluation of 9% Tax Credit Competitive Applications, subsection D. Selection part 4. Tie-Breaker. **Answer**:This tiebreaker applies if tiebreaker (a) did not break the tie and the proposed sites of the tying applications are in different Local Government Boundaries (LGBs). To apply this tiebreaker, DCA will perform the following analysis: * For each LGB associated with the tying applications, identify the most recent 9% Credit award
* Identify which of these most recent allocations is the oldest. The application in the LGB with the oldest of these allocations wins the tiebreaker.

This policy furthers DCA’s priorities for equitable geographic distribution of resources. |
| 2/18/21 | 3-Scoring; 00-General | **Question ID: Q0129\_01**In some sections of the QAP, such as those dealing with proximity to desirable/undesirable neighborhood characteristics or public transportation, distances are to be measured from the geocoordinates of the proposed main pedestrian or vehicular entrance to the property. In other sections, such as those dealing with proximity to previously-funded developments, the QAP is silent on the location of the "starting point" for measuring these distances. Should an applicant assume that the geocoordinates of the proposed main pedestrian or vehicular entrance to the property is the "starting point" in all cases?**Answer:**Where small differences in distance have a practical impact under the section goals, the QAP will specify a starting point (e.g., walking accessibility of an amenity). Some section goals are not sensitive to small distance differences (e.g., equitable allocation of DCA resources across the state). In such cases, DCA staff confirm point eligibility based on any of the following location information provided in the application:* Location information from the application’s general information section (geocoordinates or site address)
* Geocoordinates of the pedestrian site entrance

If an applicant notices a point differential based off measuring from a pedestrian/vehicle site entrance, geo-coordinates, or address, they should note the difference in the supporting documentation and applicant comment box of the application. In such instances where the QAP is silent on starting point and multiple starting points are relevant, the starting point location may be construed in favor of the applicant. |
| 2/18/21 | 3-Scoring; 02-Applicability of Scoring Criteria | **Question:** **Q0111\_01**On the chart on page 102 of the QAP it says max points for 9% New desirables is 20 and for 4% New is 12. In the explanation it only mentions the 20 points and no differentiation between 9% and 4%. To be sure I understand, new construction 4% can still score points in all the same Desirables categories, but the maximum points a new 4% application can get in that area is 12 as opposed to 20 points max for a new construction 9%?**Answer:** The above interpretation is correct. Per the description above the table, “Numbers in the below table indicate the maximum points that can contribute to the Application’s score from that section given the construction type and tax credit sought.”  |
| 2/18/21 | 3-Scoring; 05-Desirable/ Undesirable Activities  | **Question: Q0202\_02**I could not find a definition for (Elementary, Middle or High schools) pertaining to Section (J) section 2 of Desirable Activities. Does a Private school qualify? **Answer**For purposes of the 2021 Competitive Round, a private school qualifies under this subsection.  |
| 2/18/21 | 3-Scoring; 06-Community Transportation Options | **Question:** **Q1221\_01**Will you please clarify what qualifies as a transit hub? Does it have to have three bus lines plus rail? Or does it have to have three of any (bus routes, rail options, or other mass transportation)?**Answer:** The QAP states: “For purposes of this subsection, a transit hub is a station that has three or more bus routes, rail options, and/or other affordable mass transit options.” “Three or more” applies to the list items and not bus lines specifically. A transit hub may qualify based on any combination of bus, rail, or other affordable mass transit options. Please review this scoring section for additional requirements related to transit hub qualification. |
| 2/18/21 | 3-Scoring; 07-Quality Education Areas | **Question:** **Q1207\_01**Points in *Quality Education Areas* are based on data from the Department of Education (DOE) gathered through standardized testing. Due to the pandemic, standardized testing did not occur, and the DOE will not release College and Career Ready Performance Index (CCRPI) scores or Beating the Odds (BTO) designations for 2020. How is DCA responding to this for purposes of 9% scoring? **Answer:** Applicants seeking points under this section can pursue either of the following:* Qualifying schools with CCRPI – Applicants now have two, rather than three, years to use for qualifying schools. [Click here](http://r20.rs6.net/tn.jsp?f=001KFxG_BcjDK_xpQarxTVQeV4F6DCCkiFpdx9PS24dNyV1WcJGFwkGRGssnq_PcFqMt6DGUJJmPFHhlYo4LgQJKpR32vJ-JSgXuJ1xbs32p3kja0gCdK43HLi43qew_hR9HA8pooq1r4crUnpSeN0T3N9HpL-_l4oflKuhoo42pzBE6Iw-aNGU2zAB47qk0qHFgIP_voov9hU3AKCxwM7HVgdpGnXOiToDs_syx0_lnUnojhJlzVIpQYxds2PNWzPKzV7siv2Y_sWYgSlEPBTPEbz5nrweep7k&c=I3wD3lQ6d57mhKTvdRHxsbbLLQpfKlf99Lj8vnLvx2HDIB56UYWy5Q==&ch=LiMjGPQmTm4go0VR6ueQO5e3u4SHWXkCMUoMEWXET54zrieKKUOxSw==) to view the CCRPI Scores Table on the DCA website.
* Qualifying schools with BTO – As signed by the Governor, the 2021 QAP provision detailing the BTO qualifications option referenced 2020 BTO designations. To allow applicants to utilize two years of BTO designations as intended, DCA’s Commissioner has signed an administrative amendment to the QAP allowing applicants to use 2018 and 2019 BTO reports to qualify schools. The amended 2021 QAP and announcement detailing the amendment are posted to the DCA website ([click here](http://r20.rs6.net/tn.jsp?f=001KFxG_BcjDK_xpQarxTVQeV4F6DCCkiFpdx9PS24dNyV1WcJGFwkGRGssnq_PcFqMt6DGUJJmPFHhlYo4LgQJKpR32vJ-JSgXuJ1xbs32p3kja0gCdK43HLi43qew_hR9HA8pooq1r4crUnpSeN0T3N9HpL-_l4oflKuhoo42pzBE6Iw-aNGU2zAB47qk0qHFgIP_voov9hU3AKCxwM7HVgdpGnXOiToDs_syx0_lnUnojhJlzVIpQYxds2PNWzPKzV7siv2Y_sWYgSlEPBTPEbz5nrweep7k&c=I3wD3lQ6d57mhKTvdRHxsbbLLQpfKlf99Lj8vnLvx2HDIB56UYWy5Q==&ch=LiMjGPQmTm4go0VR6ueQO5e3u4SHWXkCMUoMEWXET54zrieKKUOxSw==)).
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| 2/18/21 | 3-Scoring; 07-Quality Education Areas | **Question ID: Q0201\_01**I would like a clarification on the CCRPI qualifications listed below. The score table released most recently shows different information even for the same time periods from the previous table that was being used to score projects we are currently working on. The links below show the discrepancies mentioned:* CCRPI Score Table from “2020 QAP and Related Documents webpage,” posted prior to 1/27/21: <https://www.dca.ga.gov/sites/default/files/ccrpi_scores_table.pdf>
* CCRPI Score Table from “2021 QAP and Related Documents webpage,” posted 1/27/21: <https://www.dca.ga.gov/sites/default/files/2021ccrpi_scores_table.pdf>

Why do the 2019 values differ between these two tables? We have been working from the first set of guidelines in preparation for an application submission. **Answer:**The Georgia Department of Education (DOE) posted a revision to the 2019 scores after the initial release. As stated in the DOE CCRPI public release for 2019:*“NOTE: The state-level 2019 CCRPI scores have been updated… Please note that district- and school-level scores did not change; this is an update to the state scores only.​”*The above-referenced table from the 2020 QAP documents webpage was published for purposes of the 2020 round, and the revision occurred after the release of that document. For purposes of the 2021 round, DCA will allow scores to qualify based on the originally published 2019 scores, all of which are lower than the updated 2019 data. An updated CCRPI scores table has been posted to the DCA website ([click here](https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/housing-tax-credit-program-lihtc/qualified-0/2021)). Please note that in subsequent rounds the revised 2019 averages will apply.  |
| 2/18/21 | 3-Scoring; 10-Stable Communities | **Question:** **Q1222\_01**For the Local Health and Economic Indicators: If we use the 2015-2019 estimates, will we be comparing these estimates to the published percentiles that were based on the 2014-2018 estimates, or will we have to show that the 2015-2019 estimate is above the 60th percentile for that dataset?**Answer:** On January 15, 2021, DCA sent an email update indicating that the Census Bureau had released the 2019 update of the data used for scoring 9% Credit applications under the Stable Communities section. DCA has accordingly posted an updated version of the Local Health and Economic Indicators table on the DCA website ([click here](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.dca.ga.gov%2Fsafe-affordable-housing%2Frental-housing-development%2Fhousing-tax-credit-program-lihtc%2Fqualified-0%2F2021&data=04%7C01%7CBryce.Farbstein%40dca.ga.gov%7C89ae262f65464ffd6a5208d8b98d13d1%7Cdc9db449fad64fcd899014394088d4ec%7C1%7C0%7C637463362872978216%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=riLDUih8DPBiUDSwZ7lYCK6t6HtPeVPBUIYjlAK6zwQ%3D&reserved=0)), which includes both 2018 and 2019 percentile calculations. Per the QAP: “Applicants cannot claim points based on a statistics set comprising values from both before and after a data update.” Thus, applicants have two paths for scoring under this subsection, illustrated in the below table.

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| Scoring Options | Metrics | Maximum Points |
| Employment rate | Health insurance rate | Median income | Life expectancy |
| Using 2018 Census data | > 2018 Percentile | > 2018 Percentile | > 2018 60th or 80th Percentile | > Published percentile (only one)  | 5 |
| Using 2019 Census data | > 2019 Percentile | > 2019 Percentile | > 2019 60th or 80th Percentile | 5 |

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| 2/18/21 | 3-Scoring; 14-Previous Projects  | **Question:** **Q0121\_02**If a project located in an unincorporated area was awarded credits but subsequently that area is annexed into a municipality, for purposes of scoring in the 2021 cycle, would that award be considered as being in the unincorporated area or the municipality? **Answer:** *Previous Projects* states in subsection A. that points “will be awarded if the proposed development site is within a current Local Government Boundary that has not been awarded 9% Credits…” The above language intends to equitably distribute 9% credits across local government jurisdictions. As such, DCA evaluates this section based on current municipal boundaries. A municipality that has annexed a property funded under a previous 9% Competitive Round has received the prior-year award. Where applicable elsewhere in the QAP, DCA approaches this analysis in the same way (e.g., tiebreakers). |
| 2/18/21 | 3-Scoring; 18-Favorable Financing | **Question ID: Q0113\_01**If a certified CDFI Banking Institution is a lender on a development and has agreed to provide a construction and permanent source of funding that meets the four pre-requisite requirements of the Favorable Financing section of the QAP, but the funds used by that bank for the funding are not specifically designated as magnet funds, but general “bank funds”, would the financing still qualify for the favorable financing points? Some conventional banks have capital magnet or reinvestment funds specifically for this type of use, but the statement of “loans originated by a conventional bank are ineligible” appears to disqualify this situation.**Answer:** Per the 2021 QAP, qualifying sources must either meet the criteria for one of the first ten sources listed under *Favorable Financing* subsection A or constitute “Other Federal, State, or local grant funds or loans.” Further, “Loans originated by a conventional bank are ineligible.” Therefore, absent further information that clarifies how the hypothetical lending institution and sources of funds meet the criteria for one of the items under subsection A, the above-referenced financing opportunity would not qualify for points under *Favorable Financing.* |
| 2/18/21 | 6-Emphasys Application Portal  | **Question: Q0217\_01**At the 2021 QAP Workshop, DCA presented slides on how to access the Emphasys Application Portal, but I am unable to locate any directions related to this. How do I access Emphasys? **Answer**As of this date DCA has not disseminated Emphasys instructions. The Emphasys presentation at the workshop was solely intended to introduce the topic. [Click here](https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/housing-tax-credit-program-lihtc) to subscribe to the email list where Emphasys instructions will be publicized (click “Join our email list”). |
| 2/18/21 | 8-Other  | **Question: Q0217\_02*** I didn’t attend the QAP Workshop. Will the slides from the workshop be posted to the DCA website?
* I attended the workshop, and the slides disseminated ahead of time differ from the slides presented. Will the full slides be posted to the DCA website?

**Answer**As of this date, DCA has not posted the workshop slides to the website. When we do so, all slides presented will be included. Please note that DCA staff may make minor modifications to the slides eventually posted. [Click here](https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/housing-tax-credit-program-lihtc) to subscribe to our email list to be notified when DCA posts the workshop slides (click “Join our email list”). |