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**2022 Housing Tax Credit Program**

**Questions and Answers**

Published February 25, 2022

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The pages that follow are DCA responses to questions pertaining to the Housing Tax Credit program.

# Part I: Overview

## Submitting Questions

Questions must be submitted through the online 2022 Housing Tax Credit program Q&A survey hosted on the “2022 QAP and Related Documents” webpage of the DCA website ([click here](https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/housing-tax-credit-program-lihtc/qualified-0/2022)).

* **Having issues using the online survey?** Please email [hfdround@dca.ga.gov](mailto:hfdround@dca.ga.gov).
* **Concerned about the timing of DCA’s response?** 
  + At this time, DCA is prioritizing questions pertaining to the Pre-Application deadline and site selection. For all other questions, please expect at least two weeks to see a posted response.
  + If you have concerns related to response timing, please email [hfdround@dca.ga.gov](mailto:hfdround@dca.ga.gov)
* **Have a project-specific question?** There is no separate option for “project-specific” questions. Currently, all questions go through the same approval and publication process.
* **Want to add context to a previously-submitted question?** DCA updates the Q&A postings based on what has been submitted through the online survey. To ensure your comment is considered, please do not email individual DCA staff. Instead, please submit your additional context through the online survey and reference the previously-submitted question.

## Deadline to Submit Questions

The deadline to submit questions is the later of the following two dates:

* Monday, April 25, 2022
* One week following the posting of the Emphasys application for 9% Credit application preparation

This deadline is to ensure that all applicants have sufficient time to react to posted DCA responses before the May 20application 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, Emphasys).

## 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).

In the window that pops up, select the following:

* The **Date** **Posted** column should be sorted by “Type: Date”
* The **Category** column should be sorted by “Type: Number”

Question categories are assigned a number for purposes of table sorting. Below are the category breakdowns in the Q&A table:

* 1-Core Plan
* 2-Threshold
* 3-Scoring
* 4-Compliance Appendix
* 5-Manuals
* 6-Emphasys Application Portal
* 7-Application Materials (Forms, etc.)
* 8-Post-Award Clarifications (for developments that have not yet received 8609s)
* 9-Other

Category numbers take the following form:

*[Category number]* ***.*** *[subsection #]*

For example, the 6th section of *Core Plan* is *9% Round Set Asides*. This section is numbered as “1.06” in the Q&A table.

## Log of Updates to this Q&A Document

This section provides a high-level description of changes made to the document from one version to the next.

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| --- | --- |
| **Update** | **Changes** |
| 2/25/22 | * Initial document publication * Posted first Q&A set |
| 3/3/22 | * New Q&A set posted |

# Part II: Question and Answer Table

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| --- | --- | --- |
| **Date**  **Posted** | **Category** | **Question and Answer** |
| 3/3/22 | 1.13  Core Plan;  Submission Requirements And Award Limitations | **Question**: Q0216\_03  Please confirm that the DCA Rehabilitation Work Scope Form is required for 9% Rehab Pre-Applications.    For context: The pre-application is due at the very early stages of pre-development and considering the volatility of the market, the Rehab Work Scope will not provide an accurate estimate of the costs for the rehab.  Additionally, GC's and sub-contractors will be reluctant to put a project out for pricing multiple times.    **Answer**:  DCA has logged this public input for future consideration in our online QAP Public Input Survey ([click here](https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/housing-tax-credit-program-lihtc/qualified-0/2022) to provide additional input). However, for purposes of the 2022 Competitive Round, the QAP states:    **(Core Plan) Submission Requirements and Award Limitations**, subsection **A. Pre-Determinations and Waivers**: “*Applicants must submit the following requests with pre-applications…Applications proposing rehabilitation or Adaptive Reuse:…DCA Rehabilitation Work Scope Form*”    For more discussion about supporting documentation during the Pre-Application stage, please see Q&A posting **Q0216\_01**. |
| 3/3/22 | 1.13  Core Plan;  Submission Requirements And Award Limitations | **Question**: Q0216\_01  My Physical Needs Assessment (PNA) will not be ready by the Pre-Application Deadline. Will my Pre-Application Submission package, which includes Architectural waivers, be rejected for failure to include a PNA?  **Answer**:  The QAP states the following in **Core Plan, Submission Requirements and Award Limitations, A. Pre-Determinations and Waivers**:  “*Applicants must submit the following requests with pre-applications…Applications proposing rehabilitation or Adaptive Reuse:…Physical Needs Assessment report*…*All of the above-listed waivers must be submitted at the pre-application stage.*”  All waivers must be submitted by the Pre-Application deadline. If DCA requires additional documentation to assess a waiver request and said documentation was not originally included in the Pre-Application submission package, DCA will request this documentation. |
| 3/3/22 | 1.16  Evaluation of 9% Tax Credit Competitive Applications | **Question**: Q0222\_03  Will solely assisted USDA 515 properties be eligible for 9% tax credit funding under the current 2022 QAP?  **Answer**:  The QAP lists all 9% Competitive Round sub-determinations in **(Core Plan) Evaluation Of 9% Tax Credit Competitive Applications, D. Selection, 2. Sequence of Competitive Round Award Determinations**. These include:   * Preservation Set Asides: RAD, Housing Tax Credit, and HUD-assisted properties * New Supply competitions   However, DCA anticipates publishing a NOFA targeting USDA preservation with HOME funds this year, separate from the 9% Competitive Round. To receive updates regarding the NOFA, please subscribe to our email list ([click here](https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/housing-tax-credit-program-lihtc) and go to “Join our email list”). |
| 3/3/22 | 2.25  Threshold;  Occupied Developments | **Question**: Q0216\_02  It is likely that some of our market rate residents will not qualify for a tax credit unit after re-syndication and rehabilitation. Do we need to apply for a waiver during the Pre-Application stage?  **Answer**:  Yes. The QAP states:    **Threshold Criteria, Occupied Developments**: “*Applicants that foresee in-place rehabilitation or permanent displacement of residents or non-residential tenants must submit a waiver request at pre-application*.” |
| 3/3/22 | 6.00  Emphasys Application Portal | **Question**: Q0302\_15  On March 1st, the “DCA Housing Finance Updates” email blast stated that the Emphasys Pre-Application was posted, but at the bottom it also included the same email blast from the week prior indicating that DCA staff “are working to integrate the Pre-Application into Emphasys.” Please confirm the status of the Emphasys Pre-Application.  **Answer**:  In the March 1st email blast referenced, the inclusion of the prior week’s email notification about DCA staff “working to integrate the Pre-Application into Emphasys” was an error. The Emphasys Pre-Application was posted the week of February 25th. |
| 3/3/22 | 7.00  Pre-Application Form | **Question**: Q0223\_03  When reviewing the 2022 9% Pre-App Submission Instructions for Emphasys it references a form that I am not finding either on the website or part of the Performance Workbook. The file is called "Supplemental Pre-Application" and is supposed to be part of the "Submission Summary Tab". Is this not viewable until the Pre-Application is available in Emphasys?    **Answer**:  The Supplemental Pre-Application is posted to the DCA website on the 2022 Pre-Application Forms page, which can be found via the Application Manuals and Forms link on the Housing Tax Credit Program (LIHTC) webpage ([click here](https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/housing-tax-credit-program-lihtc/application)). |
| 2/25/22 | 1.19  Core Plan;  DCA Pre-Application Fees and Deadline Schedules | **Question**: Q0201\_05  When is the 9% Credits Pre-Application deadline?  **Answer**:  DCA has extended the 9% Credits Pre-Application deadline to Friday, March 11th, 2022. This extension applies to all 9% Credit deadlines previously listed as “3/4/22” in *Core Plan, Exhibit A: DCA Pre-Application Fees and Deadline Schedules*. |
| 2/25/22 | 1.19  Core Plan;  DCA Pre-Application Fees and Deadline Schedules | **Question**: Q0201\_06  When is the deadline for submitting a Full Application for consideration under the 2022 9% Credits Competitive Round?  **Answer**:  The “Application Submission” deadline for 9% Credit applications is May 20th, 2022.  The term “Application Submission,” used throughout the QAP, refers to this date for purposes of the 9% Credits Competitive Round. See the “9% Deadline” column in *Core Plan, DCA Pre-Application Fees and Deadline Schedules* for all deadlines associated with the 9% Credits Competitive Round. |
| 2/25/22 | 2.20  Threshold;  Experience, Capacity and Performance Requirements for General Partner and Developer Entities | **Question**: Q0218\_02  We were pre-qualified last year. Do we need to submit another pre-application for qualifications review this year or could we rely on last year’s qualified determination?  If the latter, do we just submit last year’s qualifications approval with our Full Application?    **Answer**:  The 2022 QAP states in *Threshold Criteria, Experience, Capacity and Performance Requirements for General Partner and Developer Entities:*   * *Overview*:“DCA reviews the following four areas of the proposed Project Team: Experience, Capacity, Performance, Compliance History…” * *C. Requirements for Experience (Certifying Entity)*: “A certifying entity that was deemed to meet experience requirements in 2021 is only exempt from submitting documentation of experience for the 2022 round. All other sections…of the performance workbook must be completed. Only those certifying entities that have received a determination letter of “Qualified” in the 2021 round will be deemed to qualify under grandfathering.”     Applicants seeking Experience approval under “grandfathering,” as described above, can submit the letter received from DCA confirming qualifications approval for the 2021 Competitive Round. All other parts of the qualifications review must be submitted in full for the 2022 Competitive Round. |
| 2/25/22 | 7.00  Application Materials (Forms, etc.) | **Question**: Q0221\_02  For certain Pre-Application waiver requests, we have to submit a draft Core Application. When does DCA anticipate posting the Core Application? Or can we use the most recent Core Application version available?    **Answer**:  Where a draft Core Application is needed for a Pre-Application submission, please utilize the most recent available, which at this time is the 2021 Core Application ([click here](https://www.dca.ga.gov/safe-affordable-housing/rental-housing-development/housing-tax-credit-program-lihtc/application) to view posted Application Manuals and Forms by year). |
| 2/25/22 | 9.00  Other;  2021 QAP requirement | **Question:** Q0218\_01  Do we still need to submit a Cost Limit waiver at the Pre-Application stage?  **Answer:**  *Threshold Criteria, Cost Limits* was dropped from the 2021 QAP. Therefore, there is no cost limit requirement to waive under the 2022 QAP. |