

2019 Q&A Posting #6

May 15, 2019

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

1. We are submitting a Baldwin County project. The DCA Utility Allowance Map effective January 2019 shows Baldwin County in the Southern Region. The 2019 Core Application utility allowance Tab cell I3 calculates the region as Northern. Which region should I use for my application? Several other counties such as Heard, Coweta, Marion and Twiggs are also calculated as North in Core App but south on map.

➤ **DCA Response:** Applicants should utilize the utility allowance region as determined by the utility allowance map. What auto populates in cell I3 does not affect the operation of the core app.

2. Previous DCA instructions required the applicant to use the Novogradic rent and income calculator; however, the revised instructions indicate that we should use the DCA HOME and Rent limits. The latest limits posted to the DCA website are for 2018. Will DCA publish 2019 limits prior to the application submission deadline?

➤ **DCA Response:** Applicants are required to use 2018 rent limits effective as of January 1, 2019.

QAP Threshold X-Site Zoning

1. The 2019 DCA checklist requires the applicable zoning ordinance. If the local municipality does not have zoning regulations and they have provided a letter confirming such, is it acceptable to mark "no" on the zoning ordinance requirement of the checklist and threshold section of the core application?

➤ **DCA Response:** A letter from the local municipality confirming the non-existence of zoning regulations is sufficient. Insert a comment in the Threshold Justification box to this affect and mark no on the checklist and the core application.

QAP Threshold XVIII- Experience, Capacity and Performance Requirements for General Partner and Developer Entities

1. The 2019 revised checklist now includes "Certificate of Existence (for Ownership entity) filed with Secretary of State. Can DCA please clarify that they are wanting the proposed Limited Partnership entity (ownership entity) to be officially formed and recorded with the Georgia Secretary of State? Customarily, entities are not filed and recorded with the Secretary of State until post award announcements to avoid the dissolution of the partnerships that were not awarded. Further, this requirement is new and not listed in the 2019 QAP; the required document may be infeasible to obtain within two weeks of the application submission.

➤ **DCA Response:** Applicants will not be required to submit a Certificate of Existence (for Ownership Entity) filed with the Secretary of State until after the announcement of awards for selected applications only.

2. We submitted our performance workbook and required supplemental documentation at pre-application, but without a site location specified in either the Pre-Application Submission Form or Performance Workbook, or the Rent Schedule and Summary tab completed in the Pre-Application Submission Form. The Qualifications for Project Participants section of the Application Tabs Checklist no longer lists the performance workbook and required supplemental documentation. Do we need to re-submit the performance workbook and required supplemental documentation at full application delivery? If so, does DCA have guidance on how to structure the submission considering it is no longer a part of the Tab Checklist? Will the Rent Schedule and Summary tab in the Pre-Application Submission Form need to be part of the submission, or will the completed Part VI-Revenues & Expenses tab in the Core Application suffice to provide this information?

➤ **DCA Response:** Applicants who submitted a Qualification Determination with the proposed site as "TBD" should follow the guidance stated in the Qualification Determination letter.

All TBD sites are subject to further capacity evaluation at full application submission. DCA will utilize application project data for any additional capacity review. Applicants are not required to submit an updated Performance Workbook.

3. The instructions listed on the performance workbook indicate "DCA requires you to submit a request for a Project Team qualification determination during the Pre-application process"; however, DCA stated in the QAP meeting held on February 28th that a pre-application for a qualification determination was in fact not required. The applicant did not submit a pre-application for a qualification determination but would like to submit a 9% application. Can the applicant still submit a 9% application on May 23rd? If so, where should the performance workbook and other documentation be supplied? Additionally, can DCA state what documents are required and how the applicant should organize these documents (i.e. financial statements, identity of interest, etc.)? In previous years a performance workbook and other documentation not submitted during the preapplication process was still accepted at the full application stage and all required documents were listed in Tab 19; however, Tab 19 on the 2019 checklist only requests a "Qualification Determination".

➤ **DCA Response:** The 2019 QAP states "All waivers and Project Team qualification determinations must be submitted at the pre-application stage."

The slides presented at the 2019 QAP Workshop restate this requirement.

DCA will not review or consider new project team qualifications submitted with the full application.

QAP Scoring III-Desirable/Undesirable Activities

1. The QAP states that driving routes must originate at the geo-coordinates of the vehicle site entrance and end at the geo-coordinates of the desirable amenity. The documentation to be provided states " Google Maps driving or walking route for each claimed desirable starting from the walking and/or driving entrance of the desirable amenity".

Is the end point provided by Google Maps for the amenity acceptable as a starting or ending point so long as the map clearly shows the driving directions end at least at the vehicular entrance to the amenity's parking lot? Will maps and directions starting at the development site and ending at the entrance to the amenity be acceptable?

➤ **DCA Response:** Regarding walking/driving routes and maps indicating desirable end points/entrances, geo-coordinates for driveway entrances leading to the desirable location will be accepted as the end-point for distance requirement purposes.

OTHER

1. We are working on application for CDBG-DR on a project in a qualifying zip code. We are unsure if we are required to submit a full 9% Tax Credit application in the 2019 Competitive Round due on May 23. Our plan was to combine CDBG as the debt source and combine with an allocation of 9% tax credits if successfully awarded. If we don't submit an application during the 9% competitive round but submit under the upcoming Disaster Funding NOFA will we still be eligible to have 9% credits allocated to our development or will we have to use 4% credits?

➤ **DCA Response:** Applicants wishing to apply for CDBG-DR funds in one of the qualifying zip codes should do so no later than July 8, 2019, the application deadline under the RFP. Applicants who submit an application by this deadline may propose 9% or 4% applications.