



2026-2027 Qualified Allocation Plan

Draft 3 Substantive Changes

This document provides a high-level overview of substantive changes in the final draft of the 2026-2027 Qualified Allocation Plan (QAP). Draft 1 and 2 substantive changes are included, and draft 3 substantive changes are noted in **red**.

Core Plan

Definitions

- **Draft 1:** “Successful Projects” or “Successful Tax Credit Projects” definition updated to include “no open 8823s listing uncorrected noncompliance”

QAP Selection Requirements

- **Draft 2:** removed “DCA Housing Strategic Goals” as these are agency-wide and not specific to the QAP

Competitive Rounds

Requirements and Timeline

- **Draft 1:** Submission Requirements and Timeline table updated with 2026-2027 dates
- **Draft 1:** Intent to Apply submission removed
- **Draft 2:** Project Team Qualifications submission deadlines moved back to General Information Notice submission deadlines (deadlines were moved up in Draft 1)
- **Draft 1:** Applicants applying for Preservation Set Asides and/or Non-Profit Set Asides must submit relevant minimum documentation at Competitive Application
- **Draft 2:** Bond inducement resolution moved from Competitive Application to Threshold Submission (points will be available for bond inducement resolution at Readiness to Proceed)

Set Asides and Allocation Targets

- **Draft 1:** Disaster Rebuilding Set Aside: “DCA may select up to three Applications under **each** Competitive Round...” (updated from “either” Competitive Round)
- **Draft 3:** USDA 515 portfolio bond set aside lowered to \$20 million

Application and Award Limitations

- **Draft 2:** applications and awards per Competitive Round returned to 2024-2025 maximums (these had been increased in Draft 1)
- **Draft 1:** 9% Credits Award Limitations: Credit Award Limit updated to MWBE Points Credit Award Limit (removed eligibility for higher credit award limit for Applicants claiming points under **(Scoring) Minority- and Women-owned Business Engagement**)
- **Draft 2:** 4% Credits/Bonds Round Award Limitations: maximum Bond Allocation request lowered from \$40 million to \$25 million



Evaluation of Competitive Applications

- **Draft 1:** Tiebreaker added for both 9% Credits and 4% Credits/Bonds: “for ties between New Construction, Family tenancy Applications, 20% or more units are three or four bedrooms”
- **Draft 1:** Removed two tiebreakers for 4% Credits/Bonds:
 - “the Bonds Geographic Distribution Area(s) that have not yet received a selected Application...” (already covered through Broad Geographic Distribution of 4% Credits/Bonds in Set Asides and Allocation Targets)
 - “Readiness to Proceed” narrative

Post-Award

- **Draft 3:** Added “Applicants must meet all deadlines indicated in the LOD. DCA reserves the right to rescind award for failure to meet deadlines in the LOD.”

Tax Credit Administration

- **Draft 2:** Front-End Cost Review: Added “If costs increase more than 10% between Competitive Application and submission of Front-End Cost Review, owners must submit a written explanation to DCA.”

Project Reconfiguration/Application Modification

After Award

- **Draft 1:** “Subsequent to awards...number of units **may not be reduced**” (updated from “number of units...cannot change”)
 - Any change after award will not be accepted if the change would have reduced the Application score
- **Draft 2:** “The UA **source** utilized may not change until eighteen months after placing in service.”

Monitoring and Compliance

- **Draft 2:** Inspections: Added “Owners are responsible for notifying DCA construction services if construction has begun and owner has not been contacted by the assigned inspection company”

Exhibits to Core Plan

- **Draft 2:** DCA Fees Schedule: Construction Monitoring Inspection Fee due at time of 60 Day Submission
- **Draft 2:** DCA Post-Award Checklist and Deadlines:
 - Added: Front-End Cost Review due forty-five days prior to Construction Loan Closing
 - 8609s with Part II completed and signed due within **thirty** days of DCA’s issuance of IRS Form 8609 Part 1 (previously within sixty days)

Threshold

Project Feasibility, Viability Analysis & Conformance with Plan

- **Draft 2:** Commitments: Added “DCA reserves the right to request updated commitments for documents dated outside of a reasonable timeframe.”

Cost Limits

- **Draft 2:** New Threshold section added requiring developments to meet HUD Total Development Cost limits, adjusted by factors depending on geography and unit type.
 - Cost Limits Workbook also posted to DCA website
 - **Draft 3:** Adjustment factor modified for Rural developments

- **Draft 3:** Cost Limits Waivers section edited

Appraisals

- **Draft 2:** Identity of Interest: Added: “Exceptions to this policy may be made for properties purchased during the one-year Qualified Contract sale period.”
- **Draft 2:** Removed “DCA will not recognize higher values based on actions taken by the Owner/Applicant or any Related Party.”

Site Control

- **Draft 1:** Minimum documentation updated

Site Information and Conceptual Site Development Plan

- **Draft 3:** CSDP must include location of accessible and adaptable units reserved under **(Scoring) Integrated Supportive Housing.**

Building Sustainability

- **Draft 2:** Green Building Initiative’s Green Globes Certification added
- **Draft 2:** Water Heater requirements removed
- **Draft 3:** Enterprise Green Communities certification language updated

Accessibility Standards

- **Draft 2:** Qualified Consultant: removed requirement that Consultant cannot be a member of the proposed Project Team (Identity of Interest must be disclosed to DCA)

Project Team Qualifications

- **Draft 2:** Clarifications of current process, not intended as policy change:
 - Project Team Qualification determinations are valid only for the calendar year in which they are issued (e.g. a Project Team must have a determination issued by DCA in 2026 to be eligible to submit an Application under the 2026 9% or 4% Round).
 - Requests submitted by the applicable 9% Round deadline are evaluated for qualification for both the 9% and 4% Rounds unless otherwise specified by the Project Team. Requests submitted by the applicable 4% Round deadline (but after the 9% Round deadline) are evaluated for only the 4% Round.
 - Clarified eligibility requirements.
 - Specified DCA’s areas of review for all Project Team Members (including non-Certifying entities).
 - Clarified Minimum Documentation required with all submissions versus upon DCA request.
- **Draft 2:** New Minimum Documentation item: If applicable, proof of communication with DCA confirming cure of open 8823(s) is in progress

Waiver of Qualified Contract Right

- **Draft 1:** New Threshold section added, which requires Applicants to waive right to Qualified Contract

Optimal Utilization of Resources

- **Draft 2:** Added: “DCA may compare development budgets across Applications in order to determine optimal utilization of resources. Inability to justify costs may result in disqualification of the Application.”

Exhibits to Threshold Criteria: DCA Underwriting Policies

- **Draft 2:** Minimum annual operating expenses increased
- **Draft 2:** Maximum developer fee calculations updated:

- For 9% Credits:
 - New construction developments are limited to the lesser of:
 - 13% of total development cost (excluding developer fee and all reserves)
 - \$2,700,000
 - \$38,000 per unit
 - Rehabilitation developments are limited to the lesser of:
 - \$2,700,000
 - 30% of hard costs
- For 4% Credits/Bonds:
 - New construction developments are limited to the lesser of:
 - 13% of total development cost (excluding developer fee and all reserves)
 - \$4,500,000
 - \$30,000 per unit
 - Rehabilitation developments are limited to the lesser of:
 - \$4,500,000
 - 30% of hard costs
- **Draft 2:** Additional Requirements for 4% Credits/Bonds Applications: No more than 30% of a development's aggregate basis can be financed by tax-exempt bonds (lowered from 55%)
- **Draft 3:** Maximum developer fee calculations: Adaptive Reuse developments have the same limits as rehabilitation developments

Scoring

Applicability of Scoring Criteria

- **Draft 2:** Favorable Financing applicability added back to 4% Credits/Bonds Applications (applicability was removed in Draft 1)
- **Draft 2:** Housing Needs Characteristics applicability removed from 4% Credits/Bonds New Affordability Applications (applicability was added in Draft 1)
 - **Draft 2:** clarification that Housing Needs Characteristics is applicable to 9% Credits Preservation Applications
- **Draft 1:** Economic Development Proximity now applicable to 4% Credits/Bonds New Affordability Applications
- **Draft 2:** Previous Projects now applicable to 4% Credits/Bonds New Affordability Applications

Extended Affordability Commitment

- **Draft 1:** Waiver of Qualified Contract points removed (moved to Threshold)
- **Draft 1:** New subsection: Previous Qualified Contract Requests
 - Applicant receives points if Application is submitted by a Project Team that does not contain a Principal who has been a Principal in an ownership entity that has requested a Qualified Contract in Georgia on or after May 20, 2025
 - **Draft 2:** language updated to specify that "Points are based on the Qualified Contract request history for Principals which had 20% or more interest in the General Partner and/or Developer entities of the development(s) for which a Qualified Contract was requested."

Minority- and Women-Owned Business Engagement

- **Draft 3:** Section removed.

Favorable Financing

- **Draft 2:** restored applicability to 4% Credits/Bonds Applications (had been removed in Draft 1)

Qualifying Sources

- **Draft 1:** Removed: TCAP loans passed through a Qualified CDFI revolving loan fund

Property Cost Reduction

- **Draft 1:** Private Enterprise Agreement point option raised from 0.5 points to 1 point
- **Draft 1:** Long-term Ground Lease point option expanded to include land donations
 - **Draft 2:** language edited to “Applications for which the land that will contain the proposed property is owned **by an entity that is not a Related Party** as of Competitive Application...” (Draft 1 said “owned by a local government, or entity which received the property from a local government”)
 - **Draft 3:** clarified that long-term ground lease or land donation may be from “a local PHA, government entity, community land trust, or entity that is not a Related Party”

Compliance Performance

- **Draft 2:** removed “DCA will notify Certifying Entities and Project Team members participating in the applicable Competitive Round of uncorrected noncompliance subject to point deductions by the end of the month following Project Team Qualifications deadline” (added in Draft 1)
- **Draft 1:** Applicants will not receive point additions for properties which have open 8823s listing uncorrected noncompliance
 - **Draft 2:** added to Minimum Documentation for Point Additions: “If applicable, proof of communication with DCA confirming cure of open 8823(s) is in progress”

Integrated Supportive Housing

Supportive Housing Referrals

- **Draft 2:** Minimum percentage of reserved units lowered from 10% to 5% for 4% Credits/Bonds Applications
- **Draft 2:** units reserved to 30% AMI or lower must be reflected in Revenues & Expenses tab
- **Draft 2:** Minimum documentation updated to include letter(s) of support from DCA-approved entity(ies) confirming intent to enter into MOU
- **Draft 2:** Minimum documentation updated to account for owner-managed waitlists for PHA-provided PBRA
- **Draft 3:** Language added to clarify that the accessible and adaptable units reserved under this provision may not be used to satisfy requirements for mobility-impaired and hearing- and sight-impaired residents under **Accessibility Standards**.

Readiness to Proceed

- **Draft 1:** Removed Readiness to Proceed Narrative
- **Draft 2:** Two points added for bond inducement resolution from the issuing authority (bringing overall section total to 15 points)
- **Draft 3:** Clarified that documents may not be expired and that Phase I Environmental Site Assessment must be dated within 18 months of Competitive Application deadline

Desirable/Undesirable Activities

- **Draft 1:** Distances eligible for points extended
- **Draft 1:** Colleges/Universities part of University System of Georgia eligible for points

- **Draft 1:** Supermarkets/grocery stores language updated
 - **Draft 3:** Supermarkets/grocery stores language reverted back to 2024-2025 QAP language, with exception of new language clarifying gas stations are not eligible
- **Draft 1:** Added to requirements: Desirable characteristics that are proposed to be completed as part of the proposed development may be eligible for points in this section
 - If claiming points under this option, minimum documentation under **(Threshold) Site Information and Conceptual Site Development Plan** and **(Threshold) Site Zoning** is required at Competitive Application

Quality Education Areas

- **Draft 1:** Section updated with new years of CCRPI data
- **Draft 1:** Option A methodology updated:
 - Allows for applicants to use any one year of CCRPI data from 2023 (2026 Competitive rounds) or 2024 (2027 Competitive Rounds) onward rather than an average of all available years of data
 - Schools eligible for points if CCRPI score is at or above 50th percentile posted on DCA's website (updated from "above the average")
- **Draft 1:** Beating the Odds data years updated
- **Draft 1:** Option C removed

Revitalization/Redevelopment Plans

Revitalization Plan/Qualified Census Tract

- **Draft 1:** Subsection changed from 6 to 7 total available points
 - Maximum points in section may be achieved by obtaining maximum points in subsection A. and either B. or C. (or a combination of the three)
- **Draft 1:** Qualifying Community Revitalization Plan (CRP) changed from 2 to 4 points
- **Draft 1:** Planning Best Practices changed from 3 points to 2 points
- **Draft 1:** Assessment of the targeted area's existing infrastructure and designation of implementation measures moved to CRP requirements
- **Draft 1:** Comprehensive plan meeting CRP requirements may be eligible for consideration

Community Transformation

- **Draft 1:** Community Quarterback Board (CQB) requirements moved to **Scoring Exhibit B. Community Transformation Post-Award Responsibilities**
- **Draft 1:** GICH Support for CQB changed to GICH Support for Community Transformation

Stable Communities

- **Draft 1:** Indicators used for points updated from indices from the Georgia Housing Needs Assessment to:
 - Environmental Index (Agency for Toxic Substances and Disease Registry of the U.S. Dept. Of Health and Human Services)
 - Travel Time and Employment Rate
 - **Draft 3:** Clarified that indicators must be "in a qualifying range" to qualify for points – see Stable Communities data
- **Draft 1:** Poverty Rate and Median Income indicators (Census Bureau) remain in section
- **Draft 2:** Points eligibility for "Near a Census Tract" updated to allow for sites within a 0.25 mile *radius* of a qualifying census tract (previously required to be within 0.25 mile driving or walking distance from Application site entrance to the Census Tract border)

Community Designations

- **Draft 2:** Points for HUD Choice Neighborhood Implementation (CNI) Grant increase from 10 to 13 points

Previous Projects

- **Draft 2:** This section is now applicable to 4% Credits/Bonds New Affordability Rounds.
 - Option B. table updated to reflect half-mile radius points eligibility for 4% Credits/Bonds Rounds
- **Draft 2:** Option A. Metro Pool: Awards for Local Jurisdiction removed
 - Option B. table updated to add 15-year points option

Economic Development Proximity

- **Draft 2:** Clarified timeframe of jobs creation: “an economic development project that is expected to generate *or is in the process of generating*, within five years from the Competitive Application deadline, net new jobs...”
- **Draft 2:** Adjusted Minimum Documentation to remove requirement for an MOU, MOA or Intergovernmental Agreement approving the project to proceed

Enriched Property Services

- **Draft 2:** 3rd Party Contractor points increased from 1 to 2 points to match points for Owner-provided services (returning to 2024-2025 QAP policy)
- **Draft 2:** Owner-provided Services: Removed “Sponsors are not required to maintain the CORES certification over the life of the property.”

DCA Community Initiatives

- **Draft 2:** 2.5 Points option added for GICH Senior Year communities
- **Draft 2:** Minimum documentation language clarified

Preservation Scoring Criteria

Occupancy

- **Draft 1:** Occupancy lookback period ends within *two years* prior to Application Submission deadline (updated from two months)

Rent Advantage

- **Draft 3:** 9% Credits HUD Rental Assistance Set Aside and 9% Credits HUD RAD Set Aside applications ineligible
- **Draft 3:** Added reference: “Rent Advantage Methodology document”
 - Document to be published to Scoring Documents and Data page of website

Site Characteristics

- **Draft 1:** Housing Needs Characteristics added to eligible site characteristics sections for which Preservation applicants may receive a maximum of 20 points total (9% Credits Applications only)

Exhibits to Scoring Criteria

Community Transformation Post-Award Responsibilities

- **Draft 1:** Community Quarterback Board (CQB) requirements moved to post-award responsibilities
- **Draft 1:** Resident members of CQB do not have to self-certify income below 80% AMI