2015 DCA Qualified Allocation Plan General Questions & Answers Posting #10 May 28, 2015

QAP Threshold - 1 Project Feasibility, Viability Analysis, and Conformance With Plan

1. Section I.A.7., Operating Utility Allowance (Threshold Page 5 of 60), states, "Additionally, rents and Utility Allowances must be effective for the same year. Applicable rents and Utility Allowances, in effect one month prior to application submission must be utilized in the Application and market study." If the buildings are Tax Credit Buildings with no HOME and are located in an area where Georgia DCA administers the Section 8 Program, do you intend for the property to use the 2015 Utility Allowances even though they are not "effective" until 7/1/2015?

Response: DCA will allow either 2014 or 2015 income/rent limits for the 2015 competitive round. However, income/rents and utility allowances with the same 'effective' period should be used in conjunction, meaning that 2015 rents would call for the utility allowances that will be effective on July 1, 2015 for 2015. Likewise, utility allowances currently in effect (2014) would call for the use of the 2014 income/rents. The effective period utilized must be noted in the comments section. Applicants that submit income/rents from one period with utility allowances from another may experience a significant impact to feasibility upon adjustment by DCA. All Applicants are urged to consider the long range implications of using one effective period over the other.

QAP Threshold - 16 Site Information And Conceptual Site Development Plan

1. Tab 16.04 Site Info and development Plan (XVI) asks for Aerial photos. Can we use Google Satellite Maps, or similar, or do we need to hire a photographer who will take aerial pictures?

Response: The use of Google Satellite Maps or a similar mapping application will provide sufficient detail to accurately review the conceptual site development plan.

QAP Scoring - 20 Quality Education Area

1. We are working on a development site that does not qualify for points under the 2013 school scores; however, the schools have improved and, under the 2014 CCRIP report card, the schools DO qualify for points. The purpose of the scoring system, as stated in the QAP, is "to measure access to qualify education from early childhood through high school graduation." Given that stated purpose, it is inaccurate to only provide points for 2013 CCRIP scores when updated information has been available since December of 2014. Will DCA allow the use

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of the 2014 CCRIP data for the purpose of scoring under XX. Quality Education Areas?

Response: The 2015 QAP requires use of 2013 CCRPI data for this scoring section.

QAP Scoring - 15 Leveraging Of Public Resources

1. On p. 19 of 34 in the scoring section of the QAP, under (A) Grants/Loans, the following is stated: "no Project Participant, lender or syndicator may guarantee, fund, advance or otherwise provide direct funding for the purpose of an Application claiming points in this category (A.1.a-j). Any Application that engages in these actions will be subject to immediate disqualification from the scoring round." Does this language apply to Public Housing Authorities that are partners in the ownership entity but are also providing loans to the project with below AFR interest rates? We realize that DCA is unable to give an opinion as to whether or not points will be awarded. Our question is whether a deal in which the PHA is a partner will be disqualified if a PHA loan (with below AFR interest rate) is used for leveraging points.

Response: The QAP specifically lists funds that may come from a public housing authority (such as Replacement Housing Factor Funds) as a qualifying source under Leveraging of Public Resources - this is regardless whether the PHA is a Project Participant or not. Funds, such as RHF, are awarded by HUD to PHA's for affordable housing and they are not from a conventional lender. These funds continue to be eligible for leveraging points. If the funds are not specifically listed in scoring section XV. Leveraging of Public Resources, A.1. categories a) – h) in the QAP as a qualifying source, we will first determine if the funds are pass-through funds, loans, or grants from **conventional lenders** and then examine the relationship in the project among the Project Participant and funders as stated in the QAP before the determination of disqualification.

Electronic Core Application - 5 Utility Allowances

1. The 2015 utility allowances published by DCA are not effective until July 1, 2015. For projects that are not using HOME (i.e. tax credit only) are we supposed to use the 2015 allowances even though applications will be submitted prior to July 1, 2015?

Response: DCA will allow either 2014 or 2015 income/rent limits for the 2015 competitive round. However, income/rents and utility allowances with the same 'effective' period should be used in conjunction, meaning that 2015 rents would call for the utility allowances that will be effective on July 1, 2015 for 2015. Likewise, utility allowances currently in effect (2014) would call for the use of the

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2014 income/rents. The effective period utilized must be noted in the comments section. Applicants that submit income/rents from one period with utility allowances from another may experience a significant impact to feasibility upon adjustment by DCA. All Applicants are urged to consider the long range implications of using one effective period over the other.