

2018 Q&A Posting #2

March 30, 2018

QAP Threshold - 19 Experience, Capacity and Performance Requirements for General Partner and Developer Entities

1. Can you please clarify which documentation items a grandfathered applicant is required to submit as well as the documents which are not required?
 - Grandfathered applicants are not required to fill out the Experience tab in the Performance Workbook or to submit supporting documentation of Experience. Grandfathered applicants are required to fill out ALL other applicable tabs of the Performance Workbook and to submit ALL other relevant supporting documentation. See 2018 QAP Threshold section XIX Experience, Capacity and Performance Requirements for General Partner and Developer Entities - Required Documents, pgs. 40 and 41, for a list of required documents for the Certifying Entity. Of this list, numbers 6, 11, 12 and 13 are NOT required for grandfathered applicants.

QAP Threshold - 19 Experience, Capacity and Performance Requirements for General Partner and Developer Entities

1. In looking at the instructions for the Performance Workbook and under the Experience Summary Form, it states one of the additional documents required is "limited partnership agreements that identify the Certifying Entity and/or Principal for each Successful Tax Credit Project used to meet experience requirements"
2. Is this accurate? Does DCA want us to include Limited Partnership Agreements for the 5 projects listed under Experience Summary Form? Would not the 8609 and certified letter from the syndicator suffice?
 - Yes, the Limited Partnership Agreements are required for the properties that are used to meet Experience requirements.

QAP Scoring - 12 Phased Development/Previous Projects

1. Under "Previous Projects (Rural Pool)", the QAP indicates that points will be awarded to an Application in the Rural Pool if the proposed development site is within a Local Government boundary which has not been awarded 9% Credits since [either year 2000 DCA Housing Credit Competitive Round, 6 years or years funding cycles].

In a Rural Pool, if a town boundaries straddle 2 different counties, do all the previous LIHTC developments count or just those in the respective counties? In other words, if a development in a town was awarded LIHTCs in say 2015 in county A, would that prevent an app from scoring under Previous Projects in this year's round in county B?

- The QAP defines "Local Government" as "the controlling elected governing body of the local jurisdiction (as defined in its Charter) in which the property is located at the time of Application (e.g., city council if within city limits, or county commission if in an unincorporated area)" (Core, p. 6-7 of 46). The relevant Local Government boundary is thus the most geographically focused Local Government boundary available. If a town contains two counties, the applicable Local Government Boundary is that of the town itself, and properties in adjacent counties outside of the town boundaries are not considered.

QAP Scoring - 17 Favorable Financing

1. If requesting Historic Tax Credits as a funding source under Minimum Documentation to be submitted it says in the QAP "A copy of the Georgia DNR-HPD and NPS approved Part 1, Part 2 and the Georgia-approved Part A (for historic tax credits only)."

It is not clear what needs to be included at application as to "Part 2". Is DCA expecting a Part 2 already approved by the NPS, a Part 2 submitted to the NPS or a Part 2 prepared and ready to be sent to the NPS?

- The QAP states under Minimum Documentation "A copy of the Georgia-HPD and NPS approved Part 1, Part 2 and the Georgia-approved Part A (for historic tax credits only). The DCA expects Part 1, Part 2 to be approved by the NPS and the Georgia Part A Preliminary Certification to be approved by Georgia DNR.

QAP Scoring - 19 Historic Preservation

1. Is submission of Part 1 to Ga SHPO sufficient for the DCA application as long as SHPO has determined that the building(s) are eligible for National Register listing by May 24 or does the National Park Service also have to review the Part 1 and determine that the buildings are eligible for individual listing by May 2, 1918? Do we have to submit a Part 2 showing present condition/proposed work by May 24? If so does the Part 2 have to be approved by SHPO and the Park Service by May 24? Am I correct on the May 24 date for all of this to be done?

- For Scoring Section 19 Historic Preservation, the Part 1 submission at application should include the approval from SHPO and NPS. Part 2 is a part of the SHPO/DNR process. DCA encourages Applicants to see www.GeorgiaSHPO.org for further guidance on the requirements and associated timeframes for the development of projects with historic tax credits.

Other

1. In the Performance Workbook, under Experience Tab it says in the instructions: "Certifying Entity that was deemed to meet experience requirements in 2017 is only exempt from submitting documentation of experience for the 2018 round. Only those certifying entities that have received a determination letter of "Qualified-Complete" in the 2017 round will be deemed to qualify under grandfathering."

What if a developer submitted all relevant documentation at the time of the 2107 pre-app, except for 3 confirmation letters from state housing agencies confirming good standing, and DCA therefore considered the team as "Qualified-Conditional". The missing 3 letters were submitted at full app but as too far out of the scoring DCA did not review the full app and hence DCA never issued a formal

“Qualified-Complete” letter. How can such a team be updated on their qualification status? Could they be considered a grandfathered or would they have to resubmit all the documentation of experience in the 2018 round?

➤ In the 2017 round, Qualification Determination was a Threshold category scored for all applications, regardless of applicant self-score. If DCA did in fact receive the outstanding letters of good standing from the remaining state agencies during the 2017 Application round, an updated letter of “Qualified-Complete” should have been sent out with the initial applicant feedback workbook. If you do not have access to this letter, please email hfdround@dca.ga.gov with the relevant 2017 application number to request a copy of the final determination letter from the 2017 round.