



2024-2025 Georgia Qualified Allocation Plan Summary of Substantive Changes

Updated 12/7/2023

This document provides a high-level overview of changes in the 2024-2025 QAP.

Please note that DCA contracted with a consultant for editing services for **Core Plan** and **Threshold Criteria**. This often resulted in changes (e.g., deletions) that appear substantive but instead were intended to clarify language, remove explanations of federal regulations (to encourage Applicants to review the regulations directly), or consolidate related information into one place.

*A previously posted version of this document incorrectly stated that **(Scoring) Integrated Supportive Housing**, Subsection **Non-DCA Supportive Housing PBRA** had moved from Scoring to Threshold. The subsection that has been moved to Threshold is **DCA PBRA Agreement**, and Subsection **Non-DCA Supportive Housing PBRA** has been updated to **Supportive Housing Referrals**, as was correctly detailed in the **(Scoring) Integrated Supportive Housing** section of this document.*

Core Plan

Definitions

- "New Supply" changed to "New Affordability," and definition changed to encompass the rehabilitation of unrestricted existing housing.
- "Preservation" definition broadened to refer to eligibility under one of the federal program set asides without further requirements related to construction.

QAP Selection Requirements (formerly "State Priorities")

- DCA Housing Strategic Goals and QAP priorities updated.
- Federal requirements for QAPs added. Section renamed to encompass federal and state QAP requirements and goals.

Competitive Rounds

- The 2023 QAP had separate Application requirements for the 9% and 4%/Bonds Competitive Rounds. The 2024-2025 QAP makes submission requirement staging the same (see next

bullet). For this reason, many changes in the redlined version that appear substantive instead are only re-arranging information for purposes of this consolidation.

A. Requirements and Timeline

- **(Threshold) Project Team Qualifications** and certain **(Threshold) Occupied Developments** requirements to be reviewed on a rolling basis prior to Competitive Application.
- Competitive round only involves Scoring Criteria. Threshold reviews will only be conducted for awarded Applications.
- Pre-Application dropped, but Applicants can request waivers before Threshold submission.

B. Set Asides and Allocation Targets

- 9% General Set Aside increased to up to 2 awards, and 4%/Bonds Round General Set Aside established, also for up to 2 awards.
- Nonprofit set aside increased from 10% to 15%, a change associated with removing **(Scoring) Exceptional Nonprofit/PHA** (see below).
- 9% Preservation Set Aside Changes:
 - USDA set aside increased by 1.
 - Housing Credit set aside reduced by 1.
 - Language added to ensure 35% of Preservation awards go to rural communities.

C. Application and Award Limitations

- 4 Application limit on 4% Credit/Bonds Competitive Round (increased from 2 Applications – now same as 9% Round).
 - PHAs allowed to exceed this limitation in both Competitive Rounds for applications in which they have a minority interest. Under the 2023 QAP, this limitation exception for PHAs only applied to the 4%/Bonds Round.
- Increased 9% Credit limits as follows:
 - Per-property 9% Credit limits increased for New Affordability.
 - Applicants for all Application types claiming points under **Minority and Women-Owned Business Engagement** eligible for additional 9% Credit limit increase of approximately 4%.
- Combined federal credit cap removed, given existing per-project and per-developer credit caps.
- Bonds request per Application raised from \$30 million to \$40 million. DCA reserves the right to exceed this limitation at its sole discretion.

D. Evaluation of Competitive Applications

- Atlanta awards limit, previously set at 10% of 9% Credits, now set the same as Other Metro locations (up to 2).
- The following tiebreakers are removed: issuer territory housing vacancy rate, Preservation Priority narrative, and public housing authority waitlists.*
 - *PHA waitlists tiebreaker replaced by **HCV and PHA Notices** in Scoring Criteria

E. Reconsideration and Appeal Processes

Procedures have been updated and clarified.

Modification/Waiver of Plan

- QAP policies to be maintained for two years, allowing for amendments that address major unintended consequences.
- Establishes procedures for amendments that do not fall under Commissioner discretion during two-year period.

Exhibits to Core Plan

Fees, post-award checklist, and deadlines updated.

Threshold Criteria

Applicability of Threshold Criteria (from 2023 QAP)

- This section has been removed, as Threshold no longer applies to the Competitive Review stage.

Project Feasibility, Viability Analysis & Conformance with Plan

- Feasibility Assumptions and Policies: Rent and Operating Utility Allowance (UA)
 - Applicants for 9% Credits must use most up to date rents as of Application submission. The January 1 option is no longer relevant as Threshold no longer applies to the Competitive Review stage.

Services

- Services requirements removed. Allowance for services in operating budget remains.

Appraisals

- Required for all projects that are selected under the Competitive Round.

Building Sustainability

B. Sustainable Building Certification

- Green Globes removed as certification option.

C. DCA Building Sustainability Training (from 2023 QAP)

- This subsection/requirement has been removed.

Project Team Qualifications

- This section replaces and adjusts the requirements of **(Threshold) Experience, Capacity and Performance Requirements for General Partners and Developer Entities** under prior QAPs.

Eligibility for Credit Under the Preservation Set Asides

A. USDA Rural Rental Housing Loan (Section 515) Set Aside Requirements

- USDA set aside eligibility: removed requirement that each building must have a PBRA contract.
- Minimum units for 4% Credits/Bonds Portfolio Applications reduced from 400 to 300.

Occupied Developments

A. Pre-Competitive Round Tenant Notices

- Certain DCA approvals required prior to Competitive Application submission.

B. Relocation and Displacement of Tenants

- DCA reserves the right to deny in-place rehabilitation for certain environmental conditions.

Supportive Housing

A. Housing Opportunities for Persons with Disabilities

- This section, previously in Core Plan under the 2023 QAP, has been moved to Threshold.
- Increased limit on reserved units for referrals correlated with disability from 20% to 25% of property units.

B. Operational Requirements

- New subsection of baseline resident protections for properties providing supportive housing.

Tenant Selection

A. Tenant Selection Plan

Applicants must submit tenant selection plan to ensure conformance with Compliance Manual, Scoring commitments, and applicable federal guidance.

B. Federal Guidance Affirmation

Applicants and property management company required to sign affirmation confirming understanding of key federal guidance with tenant selection implications as identified and published by DCA.

PBRA Agreements

This has been moved from Scoring to Threshold (formerly a subsection of Integrated Supportive Housing).

Additional Requirements for 4% Credits/Bonds Applications (from 2023 QAP)

Moved requirements in this section to related sections in Core and Threshold (Awards Limitations, Eligibility of Project Configuration, and DCA Underwriting Policies).

DCA Underwriting Policies

- Maximum developer fees increased:
 - 9% applications: \$2,285,000 (from \$2,000,000)
 - 4%/Bonds applications: \$4,000,000 (from \$3,500,000)
- Replacement reserve requirements increased.
 - Rehabilitation: \$400 per unit per year (from \$350)
 - New construction: \$300 (from \$250)
 - Single family units and duplexes: \$470 (from \$420)

Scoring Criteria

Documentation and Data

B. External Data Sources

- Added provision to allow DCA to ensure data publications can be revised, if needed, due to a methodology change from an outside data source. DCA anticipates that the next GA Department of Education CCRPI update (see **(Scoring) Quality Education Areas**) may require DCA to adjust the supplementary data posted to the DCA website for scoring schools.

C. Scoring Justifications (from 2023 QAP)

- Removed requirement to include comments for each Scoring section.

Applicability of Scoring Criteria

- Phased Developments now applies to 4%/Bonds Round

(removed) Application Completeness (from 2023 QAP)

- This section removed, as Threshold no longer part of Competitive Review process.

Extended Affordability Commitment

A. Waiver of Qualified Contract Right

Points increased for waiving the qualified contract right fully or for 10 years.

Minority- and Women-Owned Business Engagement

Entities (both for-profit and non-profit) can qualify based on self-certification (formerly required external certification programs).

A. Engagement Commitment and Reporting

- Minimum percentage increased from 5% to 10%.

B. Project-team Eligibility

- Minimum ownership interest reduced from 20% to 15%.

Favorable Financing

A. Qualifying Sources

- HOME-ARP an additional qualifying source.
- New exception: sources from a development team participant can qualify if the lender/grantor is a PHA.
- Points higher for NHTF and HOME-ARP.

B. Property Cost Reductions

- Private Enterprise Agreements: new subsection gives points for Applications associated with a Private Enterprise Agreement that will lower property taxes.

Integrated Supportive Housing

DCA PBRA Agreement (from 2023 QAP)

This subsection has been moved to Threshold.

A. Supportive Housing Referrals

- "Non-DCA Supportive Housing PBRA" (from 2023 QAP) expanded to "Supportive Housing Referrals" subsection awarding points to properties reserving units for referrals from entities approved by DCA. At this time, DCA anticipates that in most cases the approved referring entities will be the following:
 - Continuum of Care (Coordinated Entry)
 - Department of Behavioral Health and Development Disabilities entities:
 - Community Service Board and/or Housing Support Program Provider Agency
 - Regional Field Office

- Applicants do not need to submit an MOU with the Competitive Application to claim points. MOU must be submitted with Threshold Application as indicated under **(Threshold) Tenant Selection Plans**.
- At least 10% of units must be reserved for such referrals. At least as many units must be accessible and adaptable.
- Commitments anticipated for the MOU expanded in **Exhibit B** to Scoring Criteria.
- Applicants can claim additional points for having project-based rental assistance contracts that will support the units reserved for referrals.

Readiness to Proceed

- This section replaces the function of evaluating “Threshold” during the Competitive Round.
- Applicants receive points for submitting certain key documents evidencing readiness to proceed if awarded.

Deeper Targeting/Rent/Income Restrictions

A. Deeper Targeting Through Rent Restriction

This subsection now limited only to 9% Applications (reverting to 2022 QAP policy and earlier).

B. Deeper Targeting through PBRA Contracts

PBRA percentage required for points reduced from 30% to 20%.

HCV and PHA Notices

Properties receive points for engaging with local Housing Choice Voucher administrator for referrals and, if different, PHA.

Desirable/Undesirable Activities

For Scattered Site Applications, points eligibility now determined based on the distance from the amenity to the site that is farthest from the amenity (formerly based on the center point of all the scattered sites).

Economic Development Proximity

For 9% Rural and Other Metro applications, points for being within commuting distance of a large economic development project as follows:

Pool	Miles	Jobs Generated
Rural	30	90
Other Metro	20	250

Internet Access (from 2023 QAP)

This section has been removed due to changing economic conditions that make it more difficult for properties to support paying for internet access than was the case at the time this provision was first incorporated into the QAP (increased development costs, higher interest rates, and increased operating expenses).

Revitalization/Redevelopment Plans

A. Revitalization Plan/Qualified Census Tract

- Community Revitalization Plan eligibility requirement: Local Government must be a “Qualified Local Government”
- Additional points if revitalization plan was adopted by a Local Government with a designation for Revitalization Area Strategies, PlanFirst, or Rural Zones.

B. Community Transformation

- This subsection, previously its own section in the 2023 QAP, now serves as one of multiple options for scoring up to 10 points for revitalization-based site scoring.
- Limit on number of Community Transformation awardees removed (previously 5 under the 2023 QAP).
- Scoring no longer comparative. Applicants scored based on either or both of:
 - evidence of past partnerships with community organizations
 - endorsement from a GICH community
- Scoring no longer based on philanthropic activities, community improvement fund, or geographic distribution.
- Community Transformation Post-Award Responsibilities moved to Exhibits to Scoring Criteria.

C. Community Investment

- Financial Commitment points can now come from either a Local Government or a Community Quarterback Board.
- The same investment can no longer be used for both “financial commitment” points and “third-party capital investment” points.

Stable Communities

Subsections A and B from the 2023 QAP are replaced with one section of indicators derived from:

- Census Bureau data
- Environmental Protection Agency data
- Georgia Housing Needs Assessment indexes

Phased Developments

Points increased from 3 to 4 for 9% Metro Pool Competitions.

Previous Projects

Previous awards that influence points under this section now includes 4% Credits/Bonds allocations in addition to 9% Credits awards.

Change **Rural Pool** Scoring as follows:

- Base allocations on low-income units as a percentage of the population in addition to number of years since most recent award (previously only based on the latter)
- Base allocations on county (previously Local Government Boundary)

Housing Needs Characteristics

- Applicants eligible for points under this section if they meet all the following:
 - 45% or more of households in the Census Tract have a “severe housing problem” as defined by HUD
 - County exhibits either population growth or employment growth
 - Proposed development site is not located in a Qualified Census Tract
- Applicants that meet the above allowed to claim additional points from either **Stable Communities** or **Revitalization/Redevelopment Plans**
- This section is an additional “mutually exclusive track” (the other tracks being **Stable Communities**, **Revitalization/Redevelopment Plans**, and **Community Designations**).

Exceptional Nonprofit/PHA (from 2023 QAP)

This section has been removed. DCA has expanded PHA incentives elsewhere in this QAP, and DCA has expanded the nonprofit set aside to 15%.

Preservation Scoring Criteria

Preservation-specific Scoring Criteria that were separate in the 2023 QAP have been consolidated into this new section.

(removed) PBRA Contracts

Removed **PBRA Contracts** (from 2023 QAP) as a Scoring section. Replaced by revised Preservation Set Aside eligibility which focuses on restricted units or PBRA that is preserved rather than construction type.

A. Occupancy

Tiers raised to establish 85% minimum for points.

D. Tax Credit Restrictions

Lowered points for expiration year to increase competitive advantage of year 15 to 19 properties.

E. Site Characteristics

New section establishes points for property location, with points limit cap lower than what is allowable for New Affordability.

F. USDA Additional Criteria

New point options for properties at risk of program exit based on pre-payment eligibility and mortgage maturity.

Exhibits to Scoring Criteria

B. Supportive Housing Referral Commitments

This section expands upon the minimum commitments involved when claiming points under **(Scoring) Integrated Supportive Housing**, subsection **Supportive Housing Referrals**.