



2024-2025 Georgia Qualified Allocation Plan

Summary of Substantive Changes in Draft 1

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 themselves), or consolidate related information into one place.

Core Plan

Definitions

- "Incomplete document" removed because **(Scoring) Application Completeness** section has been removed. This section applied to Threshold deficiencies, and the 2024-2025 QAP proposes removing Threshold review from the Competitive Round.
- "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.

State Priorities

- DCA Housing Strategic Goals and QAP priorities updated.

Competitive Rounds

- The 2023 QAP had separate Application requirements for the 9% and 4%/Bonds Competitive Rounds. The 2024-2025 QAP proposes making submission requirement staging the same (see next bullet). For this reason, many changes in the redlined draft that appear substantive instead are only re-arranging information for purposes of this consolidation.
- Requirements and Timeline
 - 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.
- Set Asides and Allocation Targets
 - 9% General Set Aside increased to 2 awards, and 4%/Bonds Round General Set Aside established, also for 2 awards.

- 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 areas.
- Boundaries used for geographic distribution of 4% Credits/Bonds renamed to Bonds Geographic Distribution Areas.
- Application and Award Limitations
 - 4 Application limit on 4% Credit/Bonds Competitive Round (increased from 2 Applications – now same as 9% Round).
 - The exception for PHAs in the 4%/Bonds round now also applies in the 9% Round.
 - Per-property 9% Credit limits increased for most development types.
 - Applicants claiming points under **Minority and Women-Owned Business Engagement** eligible for additional 9% Credit limit increase.
 - Combined federal credit cap removed, given existing per-project and per-developer credit caps.
- Evaluation of Competitive Applications
 - Atlanta awards limit, previously set at 10% of 9% Credits, now set the same as other Metro locations.
 - The following tiebreakers are removed: issuer territory housing vacancy rate, Preservation Priority narrative.
- Reconsideration/Appeal Process
 - Applicant may not appeal points awarded to another Applicant.

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.

Threshold

(removed) Applicability of Threshold Criteria

- 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; January 1 option no longer relevant as Threshold no longer applies to the Competitive Review stage.
 - Guidance on rents and utility allowances removed to ensure Applicants are referencing the most up-to-date federal guidance.

Services

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

Appraisals

- Required for all projects if selected under Competitive Round.

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

- USDA set aside eligibility: removed requirement that each building must have a PBRA contract.

Occupied Developments

- Relocation and Displacement of Tenants:
 - No in-place rehab from projects with environmental conditions of funding.

DCA Underwriting Policies

- Maximum developer fees increased.

Housing Opportunities for Persons with Disabilities

- Moved from Core to Threshold as it is a requirement for Applications.

Additional Requirements for 4% Credits/Bonds Applications

- Moved most of this section to applicable sections in Core and Threshold (Awards Limitations, Eligibility of Project Configuration).

Scoring

Documentation and Justifications

- Removed requirement to include comments for each Scoring section.

(removed) Application Completeness

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

Deeper Targeting/Rent/Income Restrictions

- Rental Assistance Alignment added as **new subsection**.
 - Applicants must set aside 5% of units for HCV referral or PBRA.

Desirable/Undesirable Activities

- For Scattered Site Applications, points based on site furthest from desirable amenity.

Revitalization/Redevelopment Plans

- Revitalization Plan/Qualified Census Tract
 - Additional points if revitalization plan was adopted by a Local Government with a DCA designation for either Revitalization Area Strategies or PlanFirst.
- 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:
 - 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.
- 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

Previous Projects

- This section was previously based on the proximity of the current Application to a previous award and the number of years since that award. **New method** now gives points to counties with fewer low-income units as a percentage of the population.

Extended Affordability Commitment

- Waiver of Qualified Contract Right
 - Points increased for waiving the qualified contract right fully or for 10 years.

Minority- and Women-Owned Business Engagement

- Engagement Commitment and reporting
 - Minimum percentage increased from 5% to 25%.

DCA Community Initiatives

- Local Government letter requirement removed. GICH letter alone will receive points.

Favorable Financing

- Qualifying Sources
 - HOME-ARP an additional qualifying source.
 - Increased restrictions for “Other qualifying sources:” funds must be awarded directly by a public entity for the specific development.
 - New exception: sources from a development team participant can qualify if the lender/grantor is a PHA.
 - Points higher for NHTF and HOME-ARP.
- Private Enterprise Agreements
 - **New subsection** gives points for Applications associated with a Private Enterprise Agreement that will lower property taxes.

Integrated Supportive Housing

- “Non-DCA Supportive Housing PBRA” expanded to “Integrated Supportive Housing” subsection awarding points to properties reserving units for referrals from organizations that serve individuals in need of supportive housing.

Preservation Scoring Criteria

- Preservation-specific Scoring Criteria that were separate in the 2023 QAP have been consolidated into this **new section**.
- Occupancy
 - Tiers raised to establish 85% minimum for points
- Removed **PBRA Contracts** 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.
- Housing Credit Properties Additional Criteria
 - Tax Credit Restrictions:
 - Moved this subsection from Property Restrictions and Age
 - Lowered points for tax credit expiration year to increase competitive advantage of year 15 to 19 properties.
 - Qualified Contract Preservation: **New subsection** awards points to Applications preserving properties that were purchased while posted for sale under the Qualified Contract process.
- Site Characteristics
 - **New section** establishes points for property location, with points limit cap lower than what is allowable for New Affordability.
- USDA Additional Criteria
 - New point options for properties at risk of program exit based on pre-payment eligibility and mortgage maturity.

Housing Needs Characteristics

- **New section** awards points for sites located in areas exhibiting population growth, employment growth, HUD-defined "housing problems," and proximity to a major jobs creator.

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.