

Summary of Changes for 2023-2024 Qualified Allocation Plan: *Changes from 1st Draft to 2nd Draft*

Minor formatting, wording, or grammatical changes that do not change policy are not identified in this list or redlined in the draft QAP.

Section 4: Set-Aside Categories

- 4.5 Housing First: Added “eviction prevention plans” to list of documents reviewed by CSH. This is existing practice but was not listed in the QAP language.

Section 5: Threshold Requirements

- 5.1(G) Capabilities of Development Team: current year-to-date financials must be dated within 90 days of the date of application. First draft required within 60 days.
- 5.1(K) Phase I Environmental Site Assessment: removed language about IDEM Comfort Letter being submitted prior to closing
- 5.1(U) Threshold Requirements for Supportive Housing: added reference to requesting Section 811 Project Rental Assistance via Form O2
- 5.3(B) Developer Fee Limitations: removed \$1,380,000 cap for 9% developments. Developer fee limitation is now calculated solely by the per unit calculation.
- 5.3(F) Contingency Limitations: Removed general requirements, contractor overhead, and contractor profit from soft cost contingency calculation. They remain in the hard cost contingency calculation.
- 5.4(C) Accessibility Requirements: Integrated supportive housing developments in the Housing First Set-aside must have a percent of accessible or adaptable units equal to or greater than the percent of supportive housing units in the development.
- 5.4(I) Smoke-Free Housing: Clarified that for preservation of existing housing that currently allows smoking, smoke-free policies must be implemented no later than the placed-in-service date.
- 5.6 Affirmative Fair Housing Marketing Plan: new threshold section/requirement. All properties must create an AFHMP.
- 5.8 Technical Errors: Removed reference to scoring

Section 6: Scoring Criteria

- Maximum points decreased from 161 to 159
- Minimum score for 4% tax credit/tax-exempt bond applications decreased from 55 to 50 (still an increase from 40 in the previous QAP)
- 6.1(A) Rent Restrictions: Edited chart for 20-point scoring category to reduce both percentages.
- 6.1(C) Owner Paid Utilities: Removed 3-point scoring option, retained 1-point option.
- 6.1(D) Additional Years of Affordability: Added clarifying language, no policy change
- 6.2(A) Development Amenities: Chart 1, Column B- added two additional amenity options
- 6.2(A) Development Amenities: Chart 1, Column C- added and clarified options
- 6.2(A) Development Amenities: Chart 2, Column B- removed LED lighting
- 6.2(A) Development Amenities: Chart 3, Column B- added one additional amenity option

- 6.2(B) Accessible or Adaptable Units: Added reference to Compliance Manual language about marketing and leasing accessible units. This is existing policy from the Compliance Manual, just cross-referencing here.
- 6.2(G) Infill New Construction: Removed disqualification for land if most recent use in the last five years was agricultural.
- 6.2(G) Infill New Construction: Market study must certify that the site is not existing agricultural land.
- 6.2(I) Community Revitalization Plan: Receipt of bonus point for QCT is no longer dependent on also receiving bonus point for adoption by local unit of government.
- 6.2(J) Federally Assisted Revitalization Award: Added clarification that the READI and HELP programs do not qualify in this scoring category as they have their own separate category.
- 6.4(E) Housing Need Index: Added clarification that if a development is located in an unincorporated area or other area not listed as a “Place” in the HUD CHAS data, contact IHCD to discuss how to score.
- 6.5(A) Certified Tax Credit Compliance Specialist: Owner point changed to Owner or Developer contact.
- 6.5(B) MBE/WBE: Added instructions for calculating total hard costs and total soft costs for purposes of this scoring category.
- 6.5(E) Resident Services: Removed prescriptive requirement on how many services must come from each column or service category.
- 6.5(E) Resident Services: Clarified that for scattered site developments, onsite services can be provided in a community building that is part of the Development.
- 6.5(E) Resident Services: Added more options for Column 2 services in the “Health, Wellness, and Nutrition” and “Financial Capability” categories.
- 6.5(E) CORES Certification: Two-point category is no longer tied to maximizing all eight points in the service chart. Additionally, added option to enter into an MOU with a CORES-certified third-party entity to handle resident service coordination in lieu of owner or management company obtaining certification.
- 6.5(E) Resident Service Coordinator: Two-point category is no longer tied to maximizing all eight points in the service chart. Additionally, this scoring category is now exclusive to projects eligible for the Housing First Set-aside or Integrated Supportive Housing points.
- 6.5(F) Integrated Supportive Housing: Clarified language on applicability of scoring category.
- 6.5(G) Reducing the Impact of Eviction: Added link to IHCD’s new Eviction Prevention and Low-barrier Screening webpage.

Section 7: Miscellaneous

- 7.4 Progress Inspections: Added language that IHCD inspector may request proof of mitigation of Recognized Environmental Conditions or an IDEM Comfort Letter exempting the project from undertaking such mitigation efforts.
- 7.5(B) Nonprofit Right of First Refusal: ROFR language can be included in the LPA or in a separate specific ROFR Agreement document. Clarified additional language.
- 7.8 Issuance of IRS Form 8609: Air quality test is only required if the Recognized Environmental Conditions affected air quality.

SCHEDULES

Schedule C: Market Study Requirements

- Market analyst must certify that the site is not currently used for agricultural purposes in order to receive points in infill new construction scoring category.

Schedule D: Bonds

- Minimum score for 4% tax credit/tax-exempt bond applications decreased from 55 to 50 (still an increase from 40 in the previous QAP).