

From: [Alex Frazier](#)
To: [TaxCreditQuestions](#)
Subject: 2021 QAP Redline Questions
Date: Thursday, October 29, 2020 11:52:57 AM
Attachments: [image715484.png](#)

Please see my questions below regarding the 2021 QAP. Thank you.

1. I have two properties under contract that I plan to submit for 4% deals once the bond application system reopens. Will I be guaranteed following the 2021 QAP or 2020? Is there an expected date for the final 2021 QAP to be out? Asking because I wasn't sure when the final QAP will be out; if the final isn't out by the time the bond app system reopens, I imagine I would be following the 2020 QAP.
2. Are the application fees, other associated fees now the same for 4% deals as they are for 9s? this is what it looks like from the draft but just clarifying.
3. Still the same rules that third-party architects, engineers and CPAs licensed in SC only applies to 9% deals (reference p. 2 of QAP redline)? This is what I was told for 2020.
4. Deadlines (p. 2): Now it says "all applications." Will 4% deadlines now follow the same deadlines as 9% deals?
5. LIHTC award limitations (p. 2): Does this still just apply to 9s?
6. Amount of new construction awards by county: Just 9% deals?
7. I have two properties under contract that I plan to submit for 4% deals once the bond app system reopens. Is the initial app checklist likely to change? I pretty much have everything sorted out with construction and architects so at this point it would just be ordering a market study, environmental, etc. Don't want to go ahead and order these things if some of them aren't needed for the initial app. It appears that the Phase I environmental was deleted from the QAP from initial app so this is one of the reasons why I ask.
8. Are you no longer disqualifying apps for having wetlands on them? This is how I read the redline, but just clarifying.
9. Will a Geotech still be required for initial app?
10. Developer fee (4% deals): Are we no longer capped? 2020 said it could not exceed 3 mil but that portion was taken out.
11. Deferred developer fee cannot exceed 25%: Does this apply to bond deals? That portion regarding 50% was deleted and I am only seeing the 9% rule.
12. "All areas of the state now get a basis boost up to 130%": Should I be underwriting all deals at that 30% basis boost, or a lower number? Deciphering exactly what it means by "up to 130."
13. OPEX and operating reserves as it pertains to 4% deals has been deleted. Should I now follow the 9% structure?
14. Can you lead me in any form of direction as to the competitiveness that will apply to 4% deals? Will it be subjectively based?

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We've moved! Our new address is:
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