

**PRELIMINARY PROPOSED CHANGES
FOR DRAFT LOW-INCOME HOUSING CREDIT 2023 QUALIFIED ALLOCATION PLAN
June 3, 2022**

The following are preliminary proposed changes for the Draft Low-Income Housing Credit 2023 Qualified Allocation Plan (the “Draft 2023 QAP”). These preliminary proposed changes may be accepted, rejected, or modified in any respect. Changes or modifications not currently reflected herein may also be made. By posting these preliminary proposed changes, no representations are being made about any item that may be included, excluded, or modified in the preparation and approval of the 2023 QAP.

- 1) No Total Development Cost caps
 - a) COVID-19 economic impact continues
- 2) Target the award of a limited amount of housing credit to develop housing for economic development areas (e.g. the “Blue Oval” workforce area in West Tennessee)
- 3) Streamline Visitability Requirements for new construction single family developments
 - a) Look to streamline these requirements to focus on only requiring
 - i) a step-free entrance
 - ii) passage through an exterior door and all interior doors on the main floor that provide at least 32 inches of clear passage
 - iii) access to bathroom on the main floor for an individual using a wheel chair
- 4) Update construction requirements
 - a) Some industry standards for energy efficiency have changed – assure QAP requirements match current industry standards
- 5) Clarify amenity requirements for scattered-site and phased deals
 - a) Provide clarity on sharing playgrounds, ball courts, etc. where the QAP is currently silent
 - b) Develop a check list of amenity options that may be selected
- 6) Consider prohibiting development of septic fields for multifamily deals, while continuing to allow for buildings of up to 4 units
- 7) Streamline Concerted Community Revitalization Plan requirements
- 8) Add date(s) for Qualified Contract Process penalty
 - a) Specify applicable beginning/ending dates for ineligibility so as not to penalize those who participated in qualified contract process in 2021 or before when doing so was within their right.
- 9) Make energy efficiency scoring a-la-carte
 - a) Instead of “6 things for 10 points” (i.e. all or nothing), use “pick from the list below for up to 10 points”
- 10) Eliminate points for letters of intent [Sections 14.A.11 and 14.B.11]
- 11) Eliminate requirement for audited financials [Sections 14.A.13, 14.B.13, and 20.F.8.b]