

Raleigh Housing Authority

Project- Based Voucher Program

Request for Proposals and Owner PBV Proposal form

November 1, 2024



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Project-Based Voucher Program



Request for Proposal

The U.S. Department of Housing and Urban Development (HUD) allows Housing Authorities to attach up to 20% of its Consolidated Annual Contributions Contract authorized units. An additional 10% of its program may be project-based for housing serving special populations. In contrast to the tenant-based voucher program, a housing subsidy will remain connected to the unit after a tenant moves out of the unit. The owner must agree to rent the unit to eligible tenants for the duration of the Housing Assistance Payments (HAP) contract.

Under this new RFP, Raleigh Housing Authority will provide up to 100 vouchers to projects with Supportive Services in order for families and individuals to live independently and remain stably housed. Barriers to housing may include having a disability that substantially limits major life activity, poor credit, little or no income, past evictions, incarceration, and a history of, or at risk of, being homeless. Disability is defined as a person with a disability to include (1) individuals with a physical or mental impairment that substantially limits one or more major life activities; (2) individuals who are regarded as having such impairment; and (3) individuals with a record of such impairment.

Raleigh Housing Authority is looking for proposals that will provide supportive housing to individuals with a history of homelessness, disabilities or elderly persons as defined in 24 CFR 5.403. For the purpose of this exception, supportive housing means: A project that makes supportive services available for all of the assisted families in the project and provides a range of services tailored to the needs of the residents occupying such housing to help those served maintain housing. Level of service should be appropriate to the level of need.

Goals, objectives, and activities of the service plan are determined with the participation of the tenant/client and, if appropriate, family, close support persons and other providers.

Supportive Services: the extent to which such services will be provided.

The units offer certain types of supportive services to residents, such services may include (but are not limited to):

- Meal service;
- Transportation services;
- Personal care assistance;
- Job training/placement;
- Housekeeping services;
- Case Management;
- Wellness checks;
- Health-related services;
- Educational and employment services;
- Other services designed to help the recipient live in the community as independently as possible.

Such supportive services need not be provided by the owner or on-site but must be reasonably available to the families receiving PBV assistance in the project. Participation in the services is not a requirement for living in an excepted unit.

This request for proposals (RFP) is established pursuant to the Project-Based Voucher Program Final Rule published on October 13, 2005, Federal Regulations at 24 CFR Part 983 as modified by the Housing and Economic Recovery Act of 2008 (Federal Register Notice 73 FR 71037), other applicable Notices from the Department of Housing and Urban Development, the implementing provisions of the Housing Opportunity Through Modernization Act of 2016 (Federal Register Notices 82 FR 2458, 82 FR 32461, and 89 FR 38224). It is the responsibility of the owner/developer to become familiar with these regulations and requirements. **The HOTMA voucher final rule was published in the Federal Register on May 7, 2024, and can be found at 89 FR 38224.**

Pursuant to 24 CFR Part 983.51(b)(1), the Raleigh Housing Authority (the Agency) is requesting your proposal for the Project-Based Voucher Program (PBV) for rental housing rehabilitation, new construction, or existing units within the jurisdictional limits of the City of Raleigh, NC. The PBV program provides rental subsidies to Owners for units occupied by eligible singles, or families whose income does not exceed the very low-income level. Through this solicitation, RHA is making 100 Project-Based Vouchers available to property owners and developers through a competitive process.

RHA will execute a Housing Assistance Payment Contract with the successful property owner(s) for a period of up to 20 years with one optional extension for up to 20 years. Benefits to the Property Owner include stabilized rental income and occupancy for the contract period.

This Request for Proposals provides prospective PBV property owners with the basic information concerning RHA's implementation of the Project Based Voucher program.

All proposals submitted in response to this solicitation must conform to 24 CFR 983.153 Development requirements.

All proposals submitted in response to this solicitation must conform to the required specifications outlined in this document.

Before officially selecting any project-based voucher proposal, the RHA will determine that the proposal complies with HUD program regulations and requirements, including a determination that the property is eligible for project-based vouchers, that the proposal complies with the cap on the percentage or number of project-based units per project, and that the proposal meets HUD's site selection standards. Additionally, RHA reserves the right to revise the scoring criteria and issue a new RFP at any time. Conditional award of project-based vouchers will be subject to availability of vouchers and funding. While RHA will consider applications for PBVs, there is no guarantee that any proposal will be selected. RHA may award fewer vouchers than requested, or no vouchers, to proposals that meet the scoring threshold.

Participation in the PBV Program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements.

Additional information on the PBV Program can be located at [Project Based Vouchers | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#) and [PIH-2017-21.pdf \(hud.gov\)](#)

Proposals will be accepted until December 31, 2024. Notification will be posted at <https://www.rhaonline.com/business-opportunities/> if the RFP is discontinued prior to December 31, 2024.

All offerors shall submit, by email to [RFP Submissions](#) one (1) digital PDF file for each Proposal, either as an e-mail attachment (compress file, if necessary) or via a link to a file-sharing service. Proposals may also be submitted by mailing a flash drive to:

Raleigh Housing Authority
PBV RFP Proposal Response
900 Haynes St.
Raleigh, NC 27604

Any prospective Offeror desiring an explanation or interpretation of the RFP, statement of work, etc., must request it in writing. Oral explanations or instructions will not be binding.

All questions regarding this RFP should be directed in written questions must be submitted via e-mail to PBVRFPresponse@rhaonline.com no later than 2:00 p.m. on December 13, 2024.

All respondents should register their interest at PBVRFPresponse@rhaonline.com in order to submit their proposal and to ensure prompt notification of any amendments.

It is the responsibility of the respondent to check the RHA website at <https://www.rhaonline.com/business-opportunities/> for any addendums issued.

Description of the Project-Based Voucher Program

Goals of the PBV

The Agency's Project-Based Voucher Program has the following goals:

1. Achieve 100% utilization in the voucher program.
2. Create relocation opportunities for RHA's income-eligible residents that may be displaced due to redevelopment.
3. Facilitate and incentivize additional affordable housing with a preference to those that serve households making 30% AMI or less.
4. Support and collaborate with other affordable housing providers to serve extremely low-income households.
5. Support other housing providers that serve households that RHA does not have the capacity to serve such as homeless residents or those that need supportive services.

6. Deconcentrate poverty by increasing housing in areas that provide access to critical services, grocery stores and jobs.
7. Provide additional housing opportunities for the elderly and disabled.

What is the Project-Based Voucher Program?

The Project Based Voucher Program is a federal rental assistance program for very low and extremely low-income renters. Property Owners are provided with a rental subsidy that remains with the unit (PBVs cannot be used on units where another rent subsidy (such as KEYS) is used).

Benefits to the Property Owner

- Stabilized occupancy
- Stabilized income
- Housing Assistance Payment Contract may assist the developer/owner in meeting lender-underwriting criteria to obtain loan approval for rehabilitation or new construction.
- Inspections using HUD PBV standards to maintain the property's value.

Cap on the Number of Assisted Units in a Project

The regulations provide for a cap on the number of assisted units in a project, with some exclusions.

The project cap limit per project is the greater of 25 units or 25% of the units in the project. However, if the property is in a census tract in which the poverty rate is 20% or less, the project cap is 40% of the units in the project. The number of PBVs awarded per property may be limited due to the availability of vouchers or the goals of the program at the time of the issuance of the RFP.

Units that are excluded from this cap include units that serve exclusively elderly and / or disabled tenants, (age 62 or older) or units housing households eligible for supportive services available to all families receiving PBV assistance in the project.

Proposal Evaluation Factors

Raleigh Housing Authority will evaluate proposals based on the factors shown in **Scoring Criteria** of this Request for Proposals. These factors will be considered as a whole. The evaluation team will document the extent to which the proposal meets each factor.

Contract Rent

Sections 983.301, 302, and 303 relate to the contract rent that can be approved. Unless the property is a certain type of tax credit property, the approvable rent is the lowest of:

- An amount determined by the PHA, not to exceed 110 percent of the applicable fair market rent (or any exception payment standard approved by the Secretary) for the unit bedroom size minus any utility allowance;
- The reasonable rent; or
- The rent requested by the owner.

Owner Proposal Review and Selection Process

The following are the primary steps. Additional steps may be required.

1. Prospective PBV Owner submits Proposal to Raleigh Housing Authority (RHA).
2. RHA reviews proposal(s) for completeness and adherence to regulatory requirements as explained herein and under the scoring criteria.

3. Proposals are then evaluated per the evaluation factors listed below.
4. The Proposal(s) are tentatively selected pending completion of additional required regulatory actions as explained herein. After the proposal passes an Environmental Review, Subsidy Layering Review and HUD Housing Quality Inspection (HQS), as needed, the final selection will be made.
5. The Owner is notified concerning the results of the review.
6. A resolution to select a proposal may be provided to the RHA Board of Commissioners.
7. For Existing units that do not need rehabilitation, RHA and the property owner will execute a PBV Housing Assistance Payment Contract after the property passes the Environmental Review and HUD Housing Quality Inspection (HQS).
8. For properties undergoing rehabilitation or new construction, the RHA and owner sign the Agreement to Enter into a Housing Assistance Payment Contract (AHAP) **before any work concerning rehabilitation or new construction begins including excavation or site preparation (including clearing of the land)**. The AHAP is not needed for Existing projects.
9. After the rehabilitation or new construction passes local government and RHA inspections, and after the requirements in the AHAP are met, the Owner and the RHA execute the Housing Assistance Payments Contract.
10. RHA refers prospective tenants to Owner.
11. Owner screens and selects tenants as written in their tenant selection plan.
12. RHA calculates the tenant rent share and the RHA rent share, called Housing Assistance Payment (HAP).
13. The owner and tenant sign the Lease and provide a copy to the RHA.
14. The RHA provides the HAP to the owner each month and the tenants provide their share of the rent to the owner each month.

Format of Response (Proposal)

The proposal **must** respond to all requirements as outlined in the RFP below. The Proposal for this project should be organized and presented in the following order, with a cover sheet for each Exhibit.

1. Owner Proposal Form. <https://forms.office.com> (**Exhibit A**)
2. Evidence of site control. If site control is pending, please provide an explanation as to why and the expected timing for obtaining control of the property. (**Exhibit B**)
3. Certification that the owner and other project principles are not on the U.S. General Services Administration list of parties excluded from Federal procurement and non-procurement programs. (**Exhibit C**)
4. For new construction, the estimated dates for the commencement and completion of construction. For rehabilitation projects, the estimated date for completion of rehabilitation. (**Exhibit D**)
5. For new construction or rehabilitation, certification that no rehabilitation or construction has commenced including clearing of the land pursuant to 24 CFR Part 983.52d. (**Exhibit E**)

The proposed number of units to be project-based. The proposed number of units to be project-based per property should follow the information in the Cap on the Number of Assisted Units in the Project section above. Please use the following form:

<https://rhaonline1.sharepoint.com/:b:/s/ProjectBasedVoucher/EWqA5LbMtAxJsQ37OaNbsVMBM2DSL2A65zPzJ5-i7v57QQ?e=m9QppF> (**Exhibit F**)

6. Documentation of the poverty rate of the area in which the site/project is located. (**Exhibit G**)
<https://www.huduser.gov/portal/maps/hcv/home.html>
7. For new construction provide site plan and floor plans. What is the current status of the property (lending, site plan approval, zoning approval etc.) Include a list of all accessible units and amenities. For rehabilitation, provide documentation and description of proposed rehabilitation. For existing housing, provide an occupancy report. (**Exhibit H**)
8. A description of the area in which the project is located, including a list of all employment centers, schools or colleges, public transportation, health facilities, and parks and recreational areas that are in the general area of the site/project and the distance of each from the site (within a 5 mile radius). (**Exhibit I**)
9. For new construction or rehabilitation, provide documentation that the proposed new construction or rehabilitation is permitted by current zoning ordinances or regulations, or evidence to indicate that the needed rezoning is likely to be obtained and will not delay the project. (**Exhibit J**)
10. A market study reflective of the current market conditions to support the contract rents being proposed for the property (for new construction, existing, and rehab). Provide comparable units with similar size, quality, utility arrangement, and number of bedrooms as the project in question. (**Exhibit K**)
11. Provide a plan of how you will provide the supportive services, a detailed description of the supportive services provided (or to be provided) for the residents. Include information on the type of services, the frequency the services are offered, whether the services are provided on-site. Include the number of years in which the supportive services will be provided. Provide evidence of partnerships in which the supportive services will be provided (budget for services, staff for services, memorandum of understanding with service providers). The amount of service must be consistent with the population servicing. The level of service should be appropriate for the level of need. (**Exhibit L**)
12. Detailed 20-year proforma for the property. (**Exhibit M**)
13. Detailed sources and uses for the property including documentation as to the status of the funding commitments and any subordinate financing. Provide proof of financial support (Memorandum of Understanding (MOU), Letter of commitment, letter of intent for each funding source). Funding must match years of contract) (**Exhibit N**)
14. For rehabilitation provide a statement identifying the number of persons to be displaced, temporarily relocated or moved permanently within the building or complex and the organization that will carry out these activities. The estimated cost of relocation payments and services, and the sources of funding. (**Exhibit O**)
15. Disclose and describe any litigation or investigation conducted by the Department of Housing and Urban Development, the Internal Revenue Service, Housing Finance Agency, or any other federal, state or local governmental agency. (**Exhibit P**)
16. Disclose any late or delinquent payments on any debt associated with any property development or ownership. Explain the reason for the late or delinquent payment and the timing of resolution. (**Exhibit Q**)
17. Completed Environmental Review Request Form and provide a copy of the Environmental Review, Phase 1 ESA. **An environmental Review could take up to 6 months.** 24 CFR 50 and 24 CFR 58. *The respondent is responsible for determining how the environmental review regulations and requirements apply and impact their property.*
Upload completed Environmental Review Request Form (link below) and Phase 1 ESA [RHA Environmental Review Request Form - Supportive Services RFP.pdf](#) (**Exhibit R**)

18. Copy of Application for the property, Tenant Selection Plan (residents that are exiting Public Housing (PH) will have access preference given), and
 - a. Please attach your written tenant selection criteria and marketing plan to fill the PBV assisted units. At a minimum the marketing plan must state that all vacancies will be filled by eligible applicants referred from the Raleigh Housing Authority waiting list and must describe, with specificity, your tenant screening criteria. Please note that the criteria for screening both assisted and unassisted tenants must be consistent.
 - b. Please attach your operating manual and identify specific occupancy policies that assure retention. **(Exhibit S)**
19. Documentation of experience of property management and maintenance company. A copy of the Maintenance Plan and Management plan. **(Exhibit T)**.
20. Provide evidence of Ownership with the proposal. What type of ownership is to be provided, ownership documents. **(Exhibit U)**

Proposed projects must be able to meet all HUD requirements of the Project-Based Voucher program available for review at 24 CFR 983, including but not limited to evidence of site control, applicable environmental review, prevailing wage requirements and subsidy layering review. Respondents will be expected to supply any additional information requested to complete the application process

Agency Rights

The RHA reserves the right to either make no awards, or to issue multiple awards. The RHA reserves the right to reject the proposal for reasons beyond the control of the RHA or due to misinformation, errors, or omissions of any kind regardless of the stage in the proposal review process that has been achieved.

RHA reserves the right to reject, in whole or in part, any or all qualifications received in response to this RFP. RHA further reserves the right to cancel or re-issue this RFP; to modify the selection procedure or the scope of this proposed project or the required responses; to request amendments to qualifications after expiration deadlines; or to negotiate or approve final agreements. RHA also reserves the right to waive any informalities or minor irregularities if it serves its best interest to do so. The Raleigh Housing Authority will not discriminate on the basis of race, color, national or ethnic origin, religion, sex, disability, familial status, or age. Equal Housing Opportunity.

The RHA reserves the right to request additional information during the evaluation process from any Respondent that is deemed necessary to determine the Respondent's ability to construct and manage the proposed units. If such information is requested, the Respondent shall be permitted three (3) working days to provide this information.

Ineligible Properties

Project Based Voucher (PBV) proposals for the following types of units will not be approved:

1. Shared Housing
2. Units on the grounds of a penal, reformatory, medical, mental, or similar public or private institution
3. Nursing homes or facilities providing continuous psychiatric, medial, nursing services, board and care, or intermediate care; however, Project Based Voucher assistance may be attached for a

dwelling unit in an assisted living facility that provides home health care services such as nursing and therapy for residents of the housing

4. Units that are owned or controlled by an educational institution or its affiliate and are designed for occupancy by students of the institution
5. Manufactured homes
6. Cooperative housing
7. Owner occupied housing (homeownership)
8. Units occupied by a family ineligible to participate in the Project Based Voucher program
9. Units in subsidized housing
10. Units owned by Agency board members, officers and employees, members of a local governing body (and other officials); and
11. Project cannot be in a flood zone area unless the local community is participating in the National Insurance Program and Agency can assure HUD that flood insurance will be obtained. (24 CFR 55).

Tenant Selection Process and Tenant Eligibility

Applicants for vacant units subsidized through the Project-Based Voucher Program will be selected from the applicable Voucher Waiting List maintained by RHA. To qualify for the program, applicants must meet eligibility standards set forth by Federal Regulations, HUD rules and Agency's Housing Choice Voucher Program Administrative Plan. Residents that are exiting Public Housing (PH) will have access preference given.

Qualified referrals will be placed on the waiting list in order based on the date and time of application and other preferences established in the RHA's Housing Choice Voucher Program Administrative Plan. The owner/landlord has the responsibility to screen the tenant for suitable tenancy. This may include screening for criminal background, housekeeping, and payment of utility bills and rent on a timely basis. The owner's screening for Section 8 participants must be the same as for non-Section 8 tenants.

The following attachments must be reviewed. The attachments requiring signatures must be enclosed with your proposal, or the proposal will be returned as ineligible:

[Form HUD-5369, Instruction to Bidders for Contracts.pdf](#)

[Form HUD-5369-A, Representations, Certifications, & Other Statements of Bidders – signature.pdf](#)

[Form HUD-5369-B, Instructions to Offerors – Non-Construction.pdf](#)

[Form HUD-5369-C, Certifications and Representations of Offerors – Non-Construction Contract-Signature.pdf](#)

[Form HUD 2530, Previous Participation Certification.pdf](#)

[Form HUD-5370-C, General Conditions for Non-Construction Contracts.pdf](#)

Scoring Criteria

The scoring criteria includes 200 base points. Up to 5 bonus points are possible.

Please note that the Housing Authority maintains the right to not award PBVs to proposals that meet the threshold, or to award fewer PBVs than requested, based on availability of vouchers, availability of funding, or any circumstance where the full award of vouchers is not in the best interest of the Housing Authority.

The Housing Authority may award full points, partial points, or no points for any given criterion.

Summary of Evaluation Factors and Maximum Points Available			
1.	Deconcentration of Poverty	15	
2.	Site and Design of Proposed Property	25	
3.	Financial Feasibility of Project/Provides Long-Term Affordable Housing	45	
4.	Project Readiness	45	
5.	Increases the Efficiency and Utilization of the Housing Choice Voucher Program	5	
6.	Supportive Services	45	
7.	Previous Experience in Development and Management of Affordable Housing	20	
8.	Total Base Points	200	
9.	Bonus Points	5	
	Total Possible Points	230	

1.	Deconcentration of Poverty	15 Points Maximum	Points Awarded
a.	Project is located in an area where the poverty rate is less than 20%	10	
b.	For properties located in a census tract where the poverty rate is 20 percent or greater, include a narrative addressing the following regarding the location: <ul style="list-style-type: none"> • Whether it is undergoing significant revitalization • Whether it had state, local, or federal dollars invested that has assisted in the achievement of deconcentrating poverty and expanding opportunity • Whether new market rate units are being developed and the likelihood that such market rate units will positively impact the poverty rate • Whether there has been an overall decline in the poverty rate in the past five years • Whether there is meaningful opportunity for education and economic advancement. 	5	
	Total Points Awarded		

2.	Site and Design of Proposed Property	25 Points Maximum	Points Awarded
a.	In neighborhoods providing greater choices and opportunities in employment, education, transportation, and healthcare.	10	
b.	Project incorporates site, unit and common area features and amenities that are responsive to the needs of the resident population.	10	
c.	The applicant certifies that the project includes units developed in accordance with the minimum requirements of any one of the following programs: Leadership in Energy & Environmental Design (LEED); Green Communities; Passive House Institute US (PHIUS); Passive House; Living Building Challenge; National Green Building Standard ICC / ASRAE – 700 silver or higher rating; or the GreenPoint Rated Program. The project will use Universal Design principles	5	
	Total Points Awarded		

3.	Financial Feasibility of Project/Provides Long-Term Affordable Housing	45 Points Maximum	Points Awarded
a.	Project demonstrates financial feasibility for a 20-year period using applicable contract rents. Projects receiving the highest scores will document operating feasibility using generally accepted affordable housing finance assumptions and modeling.	10	
b.	The sources and uses demonstrate the financial feasibility of the property and shows the ability to obtain funding for the project. For existing units, the project demonstrates financial feasibility to maintain the property in good condition for the term of the HAP contract.	10	
c.	The project provides additional affordable housing to households making 30% AMI or less.	10	
d.	The proposal is consistent with the City of Raleigh and Wake County Affordable Housing objectives.	10	
e.	Project includes a source of funding to provide supportive services for an extended period of time.	5	
Total Points Awarded			

4.	Project Readiness	45 Points Maximum	Points Awarded
a.	The project provides timely access to RHA resident households required to relocate from public housing.	15	
b.	The proposal demonstrates control of the site.	10	
c.	<ul style="list-style-type: none"> • Evidence of readiness to proceed including market study that supports the contract rents, site plan, floor plan, funding commitments, current zoning or pending zoning approval. • For rehabilitation documentation and description of proposed relocation plan including budget. • For existing projects, the project can meet HQS standards within 45 days of proposal selection. 	10	
d.	For new construction or rehabilitation, evidence that there are financing commitments in place to complete the project. For existing properties, the property can maintain occupancy of the units consistently.	10	
Total Points Awarded			

5.	Increases the Efficiency and Utilization of the Housing Choice Voucher Program	5 Points Maximum	Points Awarded
a.	The property supports the maximum allowed amount of PBV units at the property. This area will apply if the Current HCV utilization rate is at 98% or less.	5	
Total Points Awarded			

6.	Supportive Services	45 Points Maximum	Points Awarded
a.	A supportive services provider has been identified and has provided a letter of intention to provide supportive services with a client to case manager ratio not to exceed 15:1. Bonus points will be awarded where the client to case manager ratio is lower.	15	
b.	Project has clearly identified a wide range of appropriate supportive services responsive to the needs of the residents.	10	
c.	A supportive services agreement has been entered into with a service provider to provide intensive supportive services with a client to case manager ratio not to exceed 15:1 for a period of no less than 5 years following leasing of the project	10	
d.	The supportive plan is detailed/involved, effective and the budget supports the plan	10	
	Total Points Awarded		

7.	Previous Experience in Development and Management of Affordable Housing	20 Points Maximum	Points Awarded
a.	Demonstrates significant experience and ability to design and construct high quality affordable housing units.	10	
b.	Does not have experience with a project-based voucher program, but is partnering with another entity with such experience.	5	
c.	Property manager has experience managing affordable housing properties that included Project Based Vouchers.	10	
	Total Points Awarded		

8.	HUD Requirements	Yes/No	Yes/No
a.	The Proposal supports the goals of deconcentrating poverty and expanding housing and economic opportunities pursuant to 24 CFR 983.55 (b) (1); Site Selection Standards; Compliance with PBV goals, civil rights requirements, and HQS.		
b.	The Proposal is suitable from the standpoint of facilitating and furthering full compliance with the following applicable provisions pursuant to 24 CFR 983.55 (b) (2): <ul style="list-style-type: none"> • Title VI of the Civil Rights Act of 1964 and HUD's implementing regulations at 24 CFR part 1; • Title VIII of the Civil Rights Act of 1968 and HUD's implementing regulations at 24 CFR parts 100 through 199; • Executive Order 11063 (27 FR 11527; 3 CFR, 1959–1963 Comp., p. 652) and HUD's implementing regulations at 24 CFR part 107. Section 504 site selection requirements described in 24 CFR 8.4(b)(5).		
c.	The site identified in the Proposal is consistent with HUD regulations and guidelines at 24 CFR 983.153. 24 CFR 983.55 (d) for Existing and rehabilitated housing site and neighborhood standards and 24 CFR 983.55 (e) New construction site and neighborhood standards for new construction.		
d.	For Existing Units, the site identified in the Proposal substantially meets the HQS site standards at 24 CFR 982.401(l), and for rehabilitation and new construction units, the site identified in the Proposal meets the HQS Site and Neighborhood Standards.		

9	Bonus Points		
a.	Property is located in a designated Opportunity Zone.	5	
	Total Bonus Points	5	