Ken,
Please review the below the criteria that Michigan uses to allow basis boost in areas not designated as QCT or DDA.
I am not recommending that FHFC use the exact same criteria, but I do think that a simplified rule that allows the boost under certain specific circumstances that the developer can elect to perform will be advantageous to both the development community and to FHFC staff. Not only will it reduce the chances of application mistakes and/or challenges; this approach will allow FHFC to offer incentive to developments that go beyond the QAP on matters such as Green Policy, deep income targeting, and other criteria that FHFC deems worthy of favorable treatment.
I think that this approach is acceptable under HUD's new DDA designation rule due to the provisions of HERA that allows state agencies this discretion.
Thanks,
John DuPont

Exerted from MSHDA's 2015 QAP, Exhibit V,

"Pursuant to Section IX.A. (Refers to HERA), MSHDA will use the following criteria in awarding the basis boost of up to 30% to those 9% projects not already eligible for the boost by virtue of their location in a QCT or DDA:
1. Permanent Supportive Housing projects
2. Historic Projects – Projects that are completing a rehabilitation of an existing certified historic property listed, either individually or as part of a district, on the National or State Historic Register; or that the State Historic Preservation Office expects to be listed on the National or State Historic Register.
3. Green Policy – Projects that achieve and certify to a score of 10 points in the Green Policy, which can be found in Tab M of the Combined Application, may receive a basis boost of up to 15%.
4. Deep income targeting – Projects restricting 10% of the total units to 30% AMI or less.
5. Central Cities projects
6. Rural set-aside projects
7. Strategic Investment Category projects"