



The Los Angeles Housing + Community Investment Department (HCIDLA) is posting the following Questions and Answers (Q & A - Set 1) regarding the Affordable Housing Managed Pipeline proposed regulations. The Q & A's and HCIDLA's Stakeholders Meeting presentation can be found online at <https://hcidla2.lacity.org/partners/affordable-housing-managed-pipeline>.

2021 Regulations Q & A - 1st Set

	Section	Question	Answer
	Section 1 General Provisions		
1	Section 1.1 Funds Available & AHMP Master Calendar	What date will final project recommendations be presented to City Council for approval, and are there any committee level approvals before that?	The draft Timeline was published with the Announcement. The final version of the Timeline will be published, and will include the announcement to open the application for the NOFA. The next NOFA Application will be released much sooner due to the shortened timeline for this NOFA. HCIDLA appreciates these comments and will continue to strive to improve on its commitment to transparency.
2	Section 1.1	Is there a second NOFA planned for 2021/2022? If so, when?	Please see above
3	Section 1.1	Timelines should be firm, published in advance, and shorter. Having floating timelines that continually get pushed out makes it very difficult for developers to negotiate with land seller and keep sites in contract.	Please see above
4	1.2 Housing Type	Can adaptive reuse projects apply? Would they be considered under the new construction category.	Yes, adaptive reuse projects are eligible.
5	Section 1.2	Are 9% projects preferred?	The selection process selects 9% structured projects first, and if funding is available, we may

			select 4% structured projects.
6	Section 1.4 Eligible Applicants	If the applicant has a project that is under review by the Accessible Housing Program (AcHP) for corrective actions which have yet to be completed, will the applicant's application still be allowed to compete/apply for the AHMP March 2021 NOFA?	Applicants with pending AcHP corrective actions are allowed to apply to the NOFA. However, Section 7.7 of the guidelines pertaining to HCIDLA Business Policy will be enforced on all projects through the background check compliance process, prior to issuance of any HCIDLA funding commitment.
7	Section 1.5 Eligible Projects, 5th bullet	"In all cases, income targeting must be prorated based on unit mix." Please clarify the intent of this language. Is it that any AMI's served must be proportionally distributed in the unit mix, i.e., if you have 1, 2, and 3 Bedroom units, and 20% of units at 30% AMI, the 20% at 30% AMI should be applied to all unit types, and not all of the 1 bedrooms?	Yes, units mix should be equally distributed between bedroom types.
8	Section 1.9 Density Bonus, Land Use Covenant	Will an Affordable housing referral form that has been authorized and executed by LADCP be acceptable documentation?	Yes. Section 5.1.1.A.ii of the guidelines states "Two (2) points shall be awarded to projects that have evidence from LADCP that the Affordable Housing Referral Form has been submitted..."
9	Section 1.12.2 Article XXXIV (Article 34) Requirements	HCID provides this authorization. This paragraph makes it sound like something the developer is doing to obtain. Please clarify that upon acceptance into the AHMP, HCID will issue an Article XXXIV authorization.	Yes, if a project is admitted into the AHMP Pipeline, HCIDLA will issue an Article 34 letter for the project upon receipt of a request from its project sponsor for such a letter. The last sentence of this section will be modified. Per the regulations, during the "Readiness" stage, prior to a TCAC application deadline, HCIDLA will prepare the required notices.
10	Section 1.17 Building Permits	Last paragraph states that HCID will continue to require that Building Permits be paid for prior to Bond closing for 4% LIHTC projects, but HCID has changed this policy for HHH Bond projects, which is	HCIDLA will eliminate the last paragraph of this subsection.

		very practical and cost effective. Therefore, this should be deleted to avoid confusion.	
	SECTION 2 THRESHOLD REQUIREMENTS		
11	Section 2.2.1 Demonstration of Site Control	Just as a point of clarification, developers should be allowed to document continued site control post application, even if the documentation submitted in the application shows site control for less than 60 days after the application deadline. For example, if a developer has a purchase agreement that expires 30 days after the application deadline, but they buy the site before the purchase agreement expires, they should be able to document that purchase to HCID after the application deadline to document continued site control.	HCIDLA will accept a Grant Deed or a Title Transfer Deed following a purchase of a site/property, for Site Control purposes. The deed must show the project sponsor as the new owner of the property. If the original purchase agreement has a term that is shorter than 60 days, then it shall have a provision that allows for an extension of the escrow. During the NOFA review period, the project sponsors shall notify HCID if they 1) have secured the extension of the escrow, 2) have purchased the property, or 3) wish to withdraw the application, in order for their application to move to the next phase of the underwriting.
12	Section 2.2.1	Since the regulations require that “site control must be demonstrated for a minimum of sixty (60) days post application deadline,” we request a clarification that a developer meets that requirement when it can document continued site control post application even when the documentation submitted in the application shows site control for less than 60 days after the application deadline. For example, if a developer has a purchase agreement that expires 30 days after the application deadline, but the developer buys the site before the purchase agreement expires, that should meet the 60 requirement for that developer.	
13	Section 2.2.1	There are situations where a developer’s site control	

		will expire after the application deadline but prior to HCID's 60-day window. The 60-day requirement could inadvertently lead to cost increases in instances where developers would be forced to negotiate additional time under their purchase and sale agreements and pay extension fees or even increased purchase prices. Recommendation: Allow developers to demonstrate site control extending 60 days past the application deadline or, in cases where site control that expires sooner, demonstrate that the developer has acquisition financing in place and a plan to acquire the site by the termination date in the purchase agreement.	
14	Section 2.4 Maximum Proposed HCIDLA Contribution	The regulations change the loan limits by allocating flat funding limits for 4% units and for 9% units. For the future, we invite HCID to reevaluate these loan limit tables based on the competitiveness of the projects. There should be a clarification on which subsidy schedule a 9% project should use if it meets the 50% Permanent Supportive Housing (PSH) requirement, but the other units are not PSH yet the project still meets the TCAC requirements for size.	HCIDLA will revise the proposed changes to this subsection to include Supportive Housing/Special Needs Projects under the middle column for subsidy limits which was originally for ELI units only.
15	Section 2.4	On its face, the loan limit chart for maximum HCIDLA subsidy does not seem to permit capital funding for 9% Special Needs or At-Risk projects. The column heading for the 9% loan limits indicates only Senior and Large Family projects. A note also remains below the chart indicating that "Special Needs subsidy is applied on a per-unit basis...", yet there are no separate loan limits noted for Special Needs units. We believe this note is a holdover from previous AHMP regulations. Recommendation: Clarify that the 9% loan limits apply to all project	HCIDLA will revise the proposed changes to this subsection to include Supportive Housing/Special Needs Projects under the middle column for subsidy limits which was originally for ELI units only.

		types.	
16	Section 2.4	Please clarify which subsidy limits apply to Special Needs or Permanent Supportive Housing units in 9% LIHTC projects. These types of units do not seem fit into either of the two subsidy categories provided.	Please see above.
17	Section 2.4	What subsidy-per-unit schedule are 9% special needs projects supposed to utilize? Those projects are specifically not named. Related to that, what subsidy schedule should the non-PSH units in a project with 50% PSH units utilize, as those units are not required by CTCAC to be large family units, but instead meet a certain size requirement.	Please see above.
18	Section 2.4	What does Note below Max Subsidy Limits on page 21 mean? *Available only to incentivized ELI units, see Section 5.2.X on ELI units. There is no explanation in Section 5.2 for this.	Please see above.
19	Section 2.4	What is the maximum per unit HCIDLA subsidy for 9% LIHTC Special Needs projects?	Please see above.
20	Section 2.4	Supportive Housing projects are not identified in the maximum subsidy chart.	Please see above.
21	Section 2.4	Why is the manager's unit excluded from the available subsidy? These units are required to be included and are not any less expensive to build. We believe HCD also recognizes that manager's units should receiving a certain minimum subsidy amount to help cover the cost of construction.	The HCIDLA Prop HHH Program excludes the manager's unit from the available subsidy. This technical change would allow HCIDLA to align the AHMP guidelines with that of HHH's pertaining to this item.
22	Section 2.6 Maximum Number of	We recommend that the maximum number of projects provision be eliminated for a number of	These guidelines were recommended to address the issue of over-concentration of risk. HCIDLA

	Projects Per Developer	<p>reasons. This could prevent larger more established developers from partnering with smaller organizations that could use the help because the larger organization does not want to use up one of the projects in its tally. We believe that if an entity has good projects and organizational capacity, their ability to construct needed housing in Los Angeles should not be limited. Lastly, with the abundance of Prop HHH projects in Los Angeles, some organizations have higher than normal project numbers. Developers that have engaged in HHH, with this provision, may have limited what other work they can do in the City.</p> <p>We understand, however, that there are reasons why the Department may want to cap the number of projects per developer. If HCID decides to maintain a cap, maybe it would consider raising it slightly, for example to 10 from the 7 as listed here.</p>	will keep the proposed language but will consider changes in the next set of regulations.
23	Section 2.6	<p>Maximum projects per developer should either be raised or eliminated. The City's goal should be the greatest number of high-quality units. If projects are submitted that meet the City's goals, and organizations have capacity, they should be allowed to qualify. This cap also discourages partnerships and penalizes larger nonprofits that may be part of a partnership to help a for-profit developer or a smaller nonprofit developer. If partnership projects are going to be subject to this rule, the primary development partner should be the only entity counted.</p>	Please see above.
24	Section 2.6	<p>It takes an increasingly long time to secure entitlements and the complex layered financing required to development affordable housing. Applying the project limitation to all HCIDLA financing programs including HHH, instead of only</p>	Please see above.

		AHMP projects, will limit the same developers that the experience requirement in 5.2.1 is meant to encourage. If the intent is to encourage more experienced developers for award, it appears to be at odds with the limitation on project's in Los Angeles. This will ultimately slow the pipeline and production of affordable projects in the City of LA.	
25	Section 2.6	HCIDLA should reconsider the criteria for projects to be considered as having completed its Final Close-Out process for this NOFA because of the challenges projects are currently facing as a direct result of the NAC not being available to inspect completed projects.	The language in this subsection has been added in order to satisfy the requirements of the Voluntary Compliance Agreement between HUD and HCIDLA in relation to ADA compliance. For this reason, HCIDLA is unable to make any changes in this proposed language.
26	Section 2.6	We appreciate the opportunity to initiate one new project at the time of the application if entities exceed the parameters at the time of application. However, we strongly urge HCID to eliminate the cap altogether. It is in the best interest of the city to move forward as many qualifying 9% projects as possible based on the applications that HCID receives. Many developers have numerous projects in predevelopment, particularly given the well-known challenges with moving the HHH deals through the 4%/bond pipeline given the well-known issues with bond volume cap, tremendous oversubscription for other local and state funding, as well as other hurdles that slow projects down, such as CEQA lawsuits.	Please see above.
27	Section 2.12.3 Lead/Asbestos	If a proposed project involves gutting of an existing building and keeping only the façade, can an applicant submit a letter in lieu of a lead test and/or asbestos assessment report indicate that the presence of lead and/or asbestos is/are assumed	Lead and/or Asbestos Reports will not be required, however, all projects will be required to comply under Section 106 of the NHPA.

		and the appropriate federal, state and local lead and/or asbestos hazard abatement protocols will be followed?	
28	Section 2.20 Relocation	This section should not be applicable for redevelopment of public housing sites in partnership with HACLA, as HACLA is the agency responsible for approving the relocation plan on these projects. HACLA's policy goals are to increase the supply of new units, however this increase is often achieved over multiple phases, which may mean a given phase may or may not individually meet the minimum of 100% more residential units. Applicants who provide written confirmation from HACLA that they are in compliance with HACLA's relocation policy should be deemed to be in compliance with this section.	This section is still applicable. The General Manager will consider a waiver for special circumstances.
29	Section 2.20	This section should not be applicable for redevelopment of public housing sites for which HACLA is the agency responsible for approving the relocation plan. HACLA is committed to increasing the unit supply within all of its redevelopment projects which, in the case of new construction, is achieved over multiple phases. Because of this, the minimum requirement of 100% more residential units (i.e. double) should be evaluated over the entire phased project and not for each individual phase as each phased plan may not replace the demolished units within that phase at double the amount, even though the unit increase could be achieved within the overall project. That said, the net minimum of 100% more residential units may not be a realistic requirement for all housing redevelopment sites. The increase in density is subject to entitlements, the configuration of the site, and input	Please see above.

		from key stakeholders in the surrounding community. A doubling of units may not always be realized for each site. Applicants who provide written confirmation from HACLA that they are in compliance with HACLA's relocation policy should be in compliance with this section.	
30	Section 2.22 Minimum CTCAC Final Tie-Break Scores for 9% CTCAC Set-Aside Application	Please clarify in this current round, that the 2020 tie-breaker formula should be used, as data under the new tie-breaker formula will not likely be available when the AHMP application is due.	CTCAC has published its new guidelines and the new application in Excel.
31	Section 2.25 Construction Cost Estimating Requirements	Our team has procured and documented hard estimates from several General Contractors. Will a direct estimate from a licensed general contractor be acceptable in the cost estimate category?	If the licensed general contractor is a 3rd party, then HCIDLA will accept the cost estimate from that contractor.
32	Section 2.25	The requirement for estimators to be certified by the Construction Specifications Institute or the American Society of Professional Estimators presents an unreasonably high barrier to submission. Most contractors and construction managers who work in Los Angeles do not have staff who have these certification requirements. We recently secured a proposal that met this requirement and the cost was \$27,380 vs estimates that we secure from general contractors and/ or construction managers that are often provided free of charge. -If the certification requirements remain in place, the addition of licensed contractors and/or engineers will increase the capacity of suppliers, increase the competitiveness of cost proposals and reduce the burden on predevelopment budgets and overall	HCIDLA will eliminate this requirement.

		project costs.	
33	Section 2.25	Many developers already work with (and pay fees for) a third party general contractor and/or a third party construction management firm during preconstruction. HCID's requirement that the Applicant provide a construction cost estimate prepared by an independent third-party construction cost estimating firm should be revised to include a third party general contractor or third party construction management firm, in order to reduce the need for developers to pay an additional consultant for cost estimation. Also, the requirement that the estimate must be from a party certified by the Construction Specifications Institute or the American Society of Professional Estimators should be eliminated.	If the licensed general contractor is a 3rd party, then HCIDLA will accept the cost estimate from that contractor. In addition, HCIDLA will eliminate the proposed language requiring that the cost estimators must be certified by the Construction Specifications Institute or the American Society of Professional Estimators.
34	Section 2.25	It is unclear whether there are sufficient qualified and trusted firms that are "certified by a) Construction Specifications Institute, or by b) American Society of Professional Estimators" and whether these firms will be able to meet the NOFA timeline. Given the significant impact the cost estimate will have on project scoring, we ask HCIDLA to reconsider the requirement or revise it to allow estimates from general contractors or construction managers to be submitted with the application. In addition, if HCIDLA can provide a format, template or more detailed guidelines for the cost estimate, it will help ensure more consistency across applications.	Please see above.
35	Section 2.25	The requirement that construction costs be "prepared by an independent third-party construction cost estimating firm" is likely to add to the overall	Please see above.

		cost of the project and will unnecessarily add to the workload of the project teams. Furthermore, the specific requirement that the preparer be certified by either the Construction Specifications Institute or the American Society of Professional Estimators is burdensome. This is not a certification that most construction managers or general contractors typically carry.	
36	Section 2.25	The requirement that construction cost estimates be “prepared by an independent third-party construction cost estimating firm” is likely to add to the overall cost of projects and unlikely to bring any additional value. Cost estimates are typically provided by 3rd party construction managers and/or 3rd party general contractors, neither of which typically hold this certification.	Please see above.
37	Section 2.25	Please define “related general contractor.” If construction cost estimates are required, we should be allowed to use the prospective general contractor or a third-party construction manager/owners rep that may not have the required certifications. Specifically, many of us have worked with Jack Wickersham of AMJ Construction Management for years to provide our estimates. People and firms like theirs that have years of experience but no certification should not be precluded from providing estimates.	Please see above.
38	Section 2.25	The presentation slides stated that the cost estimator must be certified by the Construction Specifications Institute of the American Society of Cost Estimators. There was also reference to LACDA’s requirements. Our experience has been that LACDA allows for a general contractor to	Please see above.

		provide an estimate with the application. We are not sure if a general contractor, per se, has cost estimators with a CSI or ASCE certification and therefore would <u>request that general contractor (who are building housing the City LA are allowed to provide estimates with the application</u> rather than requiring 3rd party who doesn't have direct construction experience to provide the estimates.	
39	Section 2.25	Does a prospective General Contracting firm qualify for providing the third-party cost estimate?	Yes. Please see above
40	Section 2.25	Can the contractor be the third party estimator for the project?	Yes. Please see above
41	Section 2.25	While it is true the County requires a signed cost estimate from a third-party construction cost estimating firm, they do not require that party have certification from either Construction Specifications Institute or the American Society of Professional Estimators. Our current construction manager who provides cost estimates based on a large portfolio of affordable housing projects in Los Angeles, does not have this certification. These certifications do not require any experience or expertise in the affordable housing or prevailing wage. If the certified estimate is deemed necessary, please eliminate these generic certifications as a prerequisite.	HCIDLA will eliminate the proposed language requiring that the cost estimators must be certified by the Construction Specifications Institute or the American Society of Professional Estimators.
	Section 3 Underwriting, Cost and Pricing Guidelines		

42	Section 3.7.2 Tax Credit Pricing	It's indicated a letter of interest for tax credit pricing is not required, but assumptions should be made to industry standard, is there guidance on the range of pricing that is expected?	HCIDLA shall defer to CTCAC for guidance on the range of allowable tax credit pricing. In addition, HCIDLA reserves the right to disapprove a funding request that is based on assumptions that are unreasonable or inconsistent with industry standards.
43	Section 3.7.4 Competitive Bid – General Contractors and Subcontractors	Under the bidding scenario that requires bids from major trades. What documentation is required to verify that a General Contractor has been selected and identified as part of the development team at the time of application?	The AHMP guidelines state that the project sponsor has the option of including its identified general contractor as a member of the development team. To document this, the name of the general contractor shall be entered in the general contractor field of the on-line application form. Section 3.7.4 of the guidelines reads, "If at the time of application, a general contractor has been selected and is identified as a member of the development team, the developer/ general contractor must provide a minimum of three (3) bids for each major trade including but not limited to site work, concrete, carpentry, drywall, plaster, mechanical, electrical and plumbing". These 3 bids from each major trades are required after the application process but prior to issuance of Notice To Proceed.
44	Section 3.7.9 Land Use Fees	This section does not reference the opportunity to obtain a waiver of the land use fees if the project is 50% supportive housing, per city ordinance. Please provide additional information on the process for obtaining the waiver of both application fees and the long-term monitoring fees.	For guidance on obtaining waiver of land use fees, if there are any, The Land Use unit can be reached at HCIDLA.Landuse@lacity.org .
	Section 5 Selection Criteria		
45	Section 5.1.1.A	Projects which do not require discretionary	Applications with a letter from LADBS stating a

	Entitlements	approvals (“by right” or ministerial) should be eligible for maximum points in this category, provided that LADCP provides the Applicant with written confirmation that the Applicant’s proposed project will not require a discretionary approval.	“By-right” or “Ministerial” zoning determination, and as further described in a memorandum dated 8/10/2020 entitled “Funding Form Procedures for Affordable Housing Projects”, will receive the maximum points under this subsection. This memorandum will be posted on the HCIDLA website.
46	Section 5.2.1 General Partner Experience	We ask for some clarity in this section. In order to receive points, “the proposed general partners, and a key person within the proposed general partner organization, must meet” (emphasis added) certain experience qualifications, such as project numbers and submitting cash flow certifications. We have three comments here. First, we would like clarity on who qualifies as a “key person” and what would happen if that person leaves the development organization while the project is ongoing. Second, we recommend that HCID use the TCAC measure of experience for this section. Third, we suggest the TCAC language of general partners or a key person rather than “and a key person” as described here.	HCIDLA will amend the proposed changes to define the key person means an Executive Director or Director of Housing in the organization, or equivalent position to the satisfaction of HCIDLA. To receive points for key person experience, documentation may include, but is not limited to curriculum vitae, and organizational documents.
47	Section 5.2.1	HCIDLA’s regulations should match CTCAC’s regulations regarding developer experience and not rely on the experience of an individual. If funding is awarded based, even partially, on the experience of an individual rather than the experience of an organization or entity, it would follow that the application should be rescored if that key person leaves the development organization or general partner while the project is ongoing. That would put projects and developers at-risk for events beyond their control. If HCIDLA decides to include the experience of a key person in its assessment of the general partner’s experience, please provide	Please see above.

		additional clarification. In order to receive points the current draft of the regulations states, “the proposed general partners, and a key person within the proposed general partner organization, must meet” (emphasis added) certain experience qualifications, such as project numbers and submitting cash flow certifications. Please clarify who qualifies as a “key person”, what criteria HCIDLA will utilize and what documentation will be required to evaluate the experience of the key person.	
48	Section 5.2.1	The requirement applying to “general partners, and a key person” should be changed to “general partners, or a key person.” “Key person” should also be defined.	Please see above.
49	Section 5.2.1	While securing a third party certification from a public accountant may prove useful as regards the performance of specific properties, this requirement will be difficult if not impossible, to secure for the certification of a “key person” within the GP entities” experience.	Please see above.
50	Section 5.2.1	We appreciate HCID aligning these qualifications with TCAC, but have a concern regarding the additional requirement related to Key Personnel. While we understand the benefits of having qualified key personnel working for the General Partner, asking that Key Personnel meet the TCAC requirements with an auditor’s verification is incongruent. Key Personnel may bring experience from other organizations, may not have been responsible for three years of operations, etc. We recommend deleting the Key.	Please see above.
51	Section 5.2.1	Would HCID consider requiring audited financial	Please see above.

		statements for any projects the developer is looking to use for experience points in lieu of a 3rd party CPA Certification of positive Cash Flow? An added certification will impose an additional financial cost on projects	
52	Section 5.2.1	Please provide clarify on this requirement, specifically on who qualifies as a “key person”, and what the implications are if this individual leaves the organization during the lifecycle of the project. We would recommend abandoning this requirement altogether and just utilizing the same experience requirements that TCAC uses.	Please see above.
53	Section 5.2.1	We support HCID’s effort to include assessment of staff as part of assessing organizational capacity, however we think that regulations should provide a path to obtain points for experience through either an organization’s experience “ or ” staff experience. Most state funding sources, including TCAC, allow applicants to meet experience thresholds and obtain points for experience based solely on documenting the experience of staff. We think HCID should adopt a similar policy. Utilizing the specific TCAC language for General Partner Experience, which allows for either organization or staff (key individual) experience, would achieve this. See the proposed language suggestions below: To receive points under this subsection for projects in existence for over 3 years, the proposed general partners, and or a key person within the proposed general partner organization, must meet the following conditions. Finally, just as a point of clarification, will HCID require the CPA certification discussed in this section at the time of submission of the HCID application?	Please see above.

54	5.2.1 and 5.2.2 General Partner Experience and Management Company Experience	Instead of the proposed language in this section, the AHMP regulations should state that Applicants must submit evidence in accordance with CTCAC Regulation Sections 10325(c)(1)(A) and 10325(c)(2)(B) to receive maximum points in these sections. This streamlines the application process while ensuring that the Applicant will score maximum points with CTCAC. As written, there are slight differences between HCIDLA's regulations and CTCAC's regulations, which adds unnecessary complication and confusion. AHMP regulation Section 1.4 Eligible Applicants already gives HCID the ability to deny applications from individuals or entities that have not met current HCIDLA Business Policy, so there is no need to reinsert that requirement into this section.	Please see above.
55	Section 5.2.3 Certified Housing Development Organization (CHDO)	We suggest reducing this scoring category to 5 points to allow the inclusion of a 5 point scoring category for a purchase price that is less than appraised value.	HCIDLA will not amend the proposed changes for this subsection at this time.
56	Section 5.2.3	We are assuming if a CHDO was a part of an LLC or Limited Partnership that the 10 points would be awarded, but perhaps clarify by saying the CHDO would need to have at least 50% ownership of the project regardless of the structure	Section 5.2.3 of the guidelines states that both the General Partner of the General Partnership and the developer/sponsor of the project, must be HCIDLA-certified CHDOs. In cases of joint ventures, all parties with the role of general partner and/or developer must be CHDOs.
57	Section 5.2.3	For the CHDO certification, are you requiring a sponsor or can the developer be the acting org?	Please see above.
58	Section 5.4 Bonus Points	For the EAP program if it is a new project, will you simply require plans identifying the requested design features?	Project sponsors who choose to participate in the Enhanced Accessibility Program (EAP) to receive the design incentive bonus shall include

			on the schematic plans (1) all of the required accessibility design features in Tables 1A and 1B or 1C, and (2) at least 5 of the optional accessibility design features. In addition, HCIDLA will require a checklist of the chosen design features. New checklist to be added to the list of documents required.
	Section 7 Project Readiness		
59	Section 7.4.1 Accessibility Certification Requirements	Q: While we support HCIDLA accessibility requirements, it is unnecessarily punitive to prohibit TCO's; CO's and permanent conversion pending a sign off for this requirement. This is particularly true in the midst of a pandemic when units can't be entered into (if needed) for clearance sign off. As previously stated we are in the middle of a housing crisis and don't see that lessening in the near term. We need to get people housed asap and not hold up occupancy (through a TCO and/ or CO holdup) and shouldn't negatively impact financing structure (permanent conversion) pending a clearance for this requirement.	The AcHP construction staff provides guidance and feedback throughout the development process to ensure that accessible features are constructed consistent with all applicable accessibility standards. The AcHP construction staff reviews architectural plans prior to issuance of building permits, performs rough and final inspections during construction and provides punchlist corrections. HUD's Neutral Accessibility Consultant certifies construction of the accessible features prior to final sign-off of the building permits and issuance of TCO/CO by LADBS. This process is designed to ensure that the accessible features are constructed correctly and do not delay occupancy of the property.
60	Section 7.4.1	This paragraph indicates HCID will not allow any occupancy until after the project receives verification of compliance by the NAC, but should remove the requirement that 100% occupancy of accessible units by people who need those features occur before overall occupancy. 100% occupancy of accessible units is a requirement of permanent loan conversion, and cannot occur before occupancy is allowed.	Please see above.

	Exhibit List		
61	Exh 01 - HCIDLA Architectural Guidelines	Q: Will HCID be issuing Design Standards that developers can use as a tool to ensure they can adhere to the requirements?	HCIDLA has published its Architectural Guidelines to the website.
62	Exh 01	Q: When will the Architectural Review occur? This question was left open and has major impacts on project planning.	In accordance with the AHMP Guidelines, the full architectural review shall be done at "Project Readiness" stage, prior to a designated TCAC Funding Round