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- Please mute your phone line at this time. You will find a microphone icon near the right edge of your screen, next to your name. Click on this, it will turn red, and your phone will be muted.
- If your PC has a microphone, please make sure it is turned off.
- Once we get through the initial presentation, I will ask you to un-mute your phones (click on the red microphone icon, it will turn black, and your line will be un-muted), and then we can talk to each other in the 'virtual classroom'.
- In the meantime, if you have a question for me, please enter it in the Chat box on the right side of your screen. If you don't see a Chat box, click the blue Chat icon at the top right of your screen, and the Chat box will open.



HUD's CNA e-Tool

Virtual Classroom: Fine Points of Accessibility

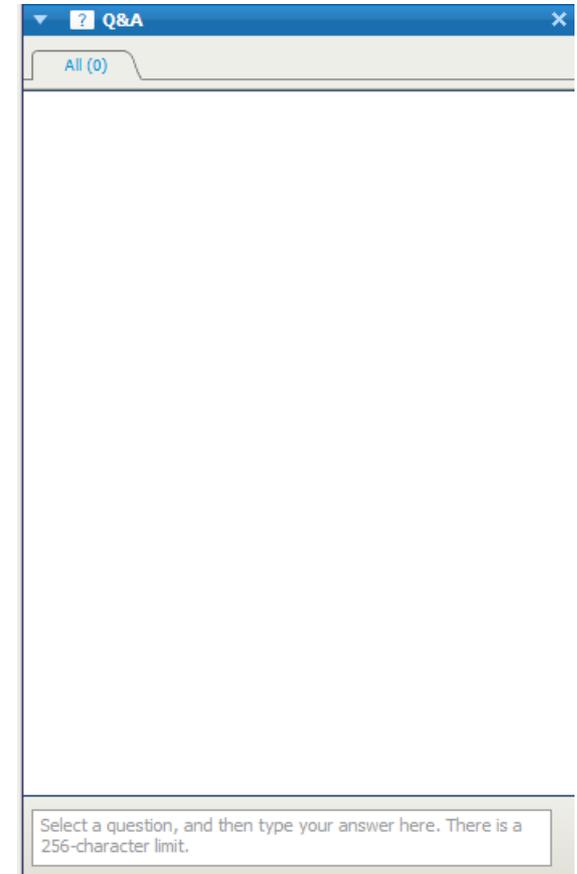
Office of Multifamily
Housing Programs

Today's Webinar Will Have Two Sections

- Recorded Portion
 - Participants self-mute
 - Use Chat box to interact with presenter
 - Lessons learned
 - Initial Questions
- Virtual Classroom
 - Recording turned off
 - Participants and presenter interact voice to voice
 - **Participants can share screens**

Webinar Logistics: Recorded Portion

- Participants please mute your phone lines
- If technical issues related to WebEx, insert them in the Chat Box



Webinar Learning Objectives

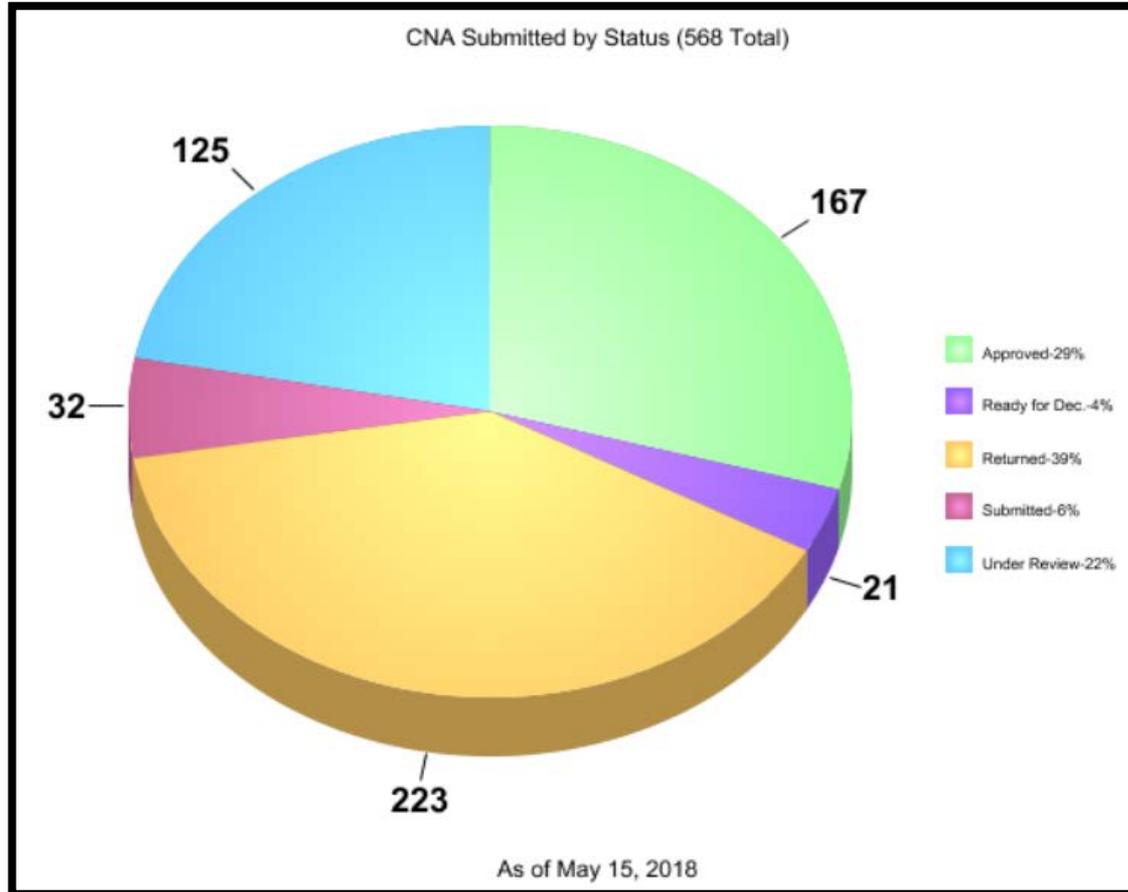
- Learn how to ensure that the accessibility requirements affecting a property's individual units and common areas affect how you are to complete the CNA and ensure it's correctness
- Understand where to access available resources and tools
- Discuss problem areas with the presenter and other participants



The CNA E-Tool

Current Highlights

CONSIDER:



HUD CNA e-Tool Webpage

https://www.hud.gov/program_offices/housing/mfh/cna



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
HUD.GOV
U.S. Department of Housing and Urban Development
Secretary Ben Carson
Información en Español

HOUSING HOME ABOUT US SINGLE FAMILY HEALTHCARE PROGRAMS MULTIFAMILY MORE HUD HOME

[Home](#) / [Program Offices](#) / [Housing](#) / [Multifamily](#) / Capital Needs Assessment Tool

Capital Needs Assessment Tool (CNA e Tool)

The Capital Needs Assessment (CNA) e-Tool automates and standardizes the preparation, submission and review of a capital needs assessment. Its use is now available on a voluntary basis and will become mandatory starting November 1, 2017 for FHA multifamily mortgage insurance applications.

Use of the CNA e-Tool for all Rental Assistance Demonstration conversions; 10-year update capital needs assessments for FHA-insured multifamily properties; and other asset management milestones, such as partial payment of claims, are available on a voluntary basis and will become mandatory starting February 1, 2018.

User: Needs Assessor

- ▶ [Assessment Tool 1.2A v5 \(Web Portal\)](#)
 - ▶ [CNA Public Validation \(Web Portal\)](#)
- ▶ [Instructions for use of the CNA e-Tool \(PDF\)](#)

User: FHA Lender Submitter

User: HUD Reviewer

- ▶ [CNA HUD Review \(Web Portal\)](#)
- ▶ [Government Internal User Manual \(PDF\)](#)
- ▶ [HUD User Access Guide \(PDF\)](#)
- ▶ [RfR Financial Factors Tool v2.0 \(XLSX\)](#)

The Ask A Question (AAQ) Resource

- Link on CNA e-Tool homepage

HUDExchange.info > Program Support > Ask A Question

Resources and assistance to support HUD's community partners

NEED HOUSING ASSISTANCE? Email Updates Log In

 **HUD EXCHANGE**
Secretary Ben Carson

Programs ▾ Resources ▾ Trainings Program Support ▾ Grantees ▾ News 🔍

Home > Program Support > Ask A Question

Ask A Question

The following Ask A Question desks are active: AFFH, BRAC, CNA e-Tool, CoC, DRGR, eCon Planning Suite, ESG, *e-snaps*, HDX, HMIS, HOPWA, HEROS, HUD-VASH, IDIS, Legacy Homeless Programs, NSP, Sage, and Title V.

The CDBG and HOME Ask A Question desks are closed and no longer accepting questions. Please contact your **local CPD Field Office** for assistance.

Step 1 of 2 1 of 2

Personal Information* Required fields

*First Name

*Last Name

CNA e-Tool: Recent Updates (on HUD CNA e-Tool webpage)

- Assessor Tool v1.2A v6 (April 2018)
- CNA e-Tool Release 2.2 Changes document
- 2018 Operational Bulletins
- CNA e-Tool Known Issues and Solutions (February 2018)
- RfR Financial Factors Tool 2.0
- Using CNA e-Tool for RAD Transactions



Lessons Learned

**Regarding the Fine Points of
Accessibility vis-à-vis the CNA e-
Tool**

Accessibility – Statutory Requirements

Lenders must assure that persons engaged in preparing CNAs are aware of:

1. The Fair housing Act design and construction requirements, which apply to all covered multifamily dwellings built for first occupancy after March 13, 1991
2. Section 504 of the Rehabilitation Act applies to all federally assisted programs, including housing
3. The Americans with Disabilities Act of 1990 (ADA) applies to public accommodations and commercial facilities tied to multifamily housing and requires that they are accessible

Summary Requirements for Insured Multifamily Properties

SUMMARY REQUIREMENTS FOR INSURED MULTIFAMILY PROPERTIES

ACTIVITY & YEAR BUILT	MARKET RATE APARTMENTS	AFFORDABLE (not assisted, e.g. LIHTC's)	FEDERALLY ASSISTED***
Projects built for 1st occupancy** after 3/13/1991	Fair Housing Act Requirements	Fair Housing Act Requirements	Fair Housing Act Requirements & 504 (UFAS or Deeming Notice****)
Projects built from 7/11/1988 to 3/13/1991	None	None	504(UFAS or Deeming Notice)
Sub rehab or Refinance of projects built prior to 7/11/1988 or built prior to becoming assisted*****	None	None	504(UFAS or Deeming Notice) (load bearing wall and financial/administrative burden exceptions)
All Public Accommodations (Designed and built for 1st occupancy or altered after 1/26/1993)	ADA Title III	ADA Title III	ADA Title III & 504 (UFAS or Deeming Notice)
State or Local Government Programs or Assistance, e.g. LIHTCs with construction start after 1/26/1992	ADA Title II	ADA Title II*****	ADA Title II & 504 (UFAS or Deeming Notice)

Corrective Action Plan (CAP)

When a CNA identifies deficiencies in existing properties, remedies must be identified/ described in a *corrective action plan*, which must:

1. Address all accessibility deficiencies
2. Describe circumstances in which a remedy to a deficiency may compromise other items
3. Defines remedies together with schedule/costs
4. Demonstrates that remedies are appropriate
5. Describes when and how corrective modifications will be completed

Where is the Corrective Action Plan?

Capital Needs Assessment Tool

Contact Us | Help | Logout

U.S. Department of Housing and Urban Development
U.S. Department of Agriculture - Rural Development

USDA
Logged in as: H46459

CNA SUBMISSION LOCATE CNA [Search Box] Reports

Expand All Collapse All Back

Reviewer [Input] Assessment ID [Input] Date CNA Submitted 4/19/2018 Review Completed Date [Input]

Rems Property ID [Input] Property Name [Input] State [Input] City [Input]

Postal Code [Input] Case Number [Input] Internal Status Under Review

View Previous History

- > Summary
- > Flags
- > Financial Factors
- > Financial Schedule
- > Estimate Period Recap
- > **Critical Repair Needs**
- > Non Critical Repair Needs
- > Future Repair Replacements
- > Component Schedule Summary
- > Narrative
- > Property Tree
- > Inspection Sample
- > Attachments
- > Reports
- > Export CNA
- > Agency CNA Decision

Back



Second Table in Critical Repairs

> Estimate Period Recap

▼ Critical Repair Needs

Life Safety Critical Repairs

View ▾ | Export | Detach

Need Category	Need Item	Component Type	Component	Alternative Name	Repair or Replacement Location	Scope of Required Replacement or Refurbishment	Action	Quantity
Additional Considerations	Environmental Items	Environmental repairs	68-Elevation Certificate	Elevation Certificate	Site	Elevation Certificate	One-time Repair	1
Additional Considerations	Environmental Items	Environmental repairs	67-Tank Integrity Test	Tank Integrity Test	Site	Tank Testing	One-time Repair	1
Building Frame & Foundation	Foundation	Slab, reinforced concrete	49-Address Building	Address Building	Refer to the building	Address the building	One-time Repair	3
Building Frame & Foundation	Foundation	Slab, reinforced concrete	50-Address Building	Address Building	Refer to the building	Address the building	One-time Repair	2
Mech.-Elect.-Plumbing	Electrical Distribution	Unit/building wiring	78-GFCI Outlets	GFCI Outlets (Critical)	Dwelling Units	Install GFCI	One-time Repair	5
Life Safety/Fire Protection	Alarm, Security & Access	Residential smoke detectors	76-HUD Compliant	HUD Compliant Smoke	Dwelling Units	Install tamper-proof	One-time Repair	248
Life Safety/Fire Protection	Alarm, Security & Access	Residential smoke detectors	77-Missing Smoke	Missing Smoke Detector	Dwelling Units	Install tamper-proof	One-time Repair	1
Interiors-Dwelling	Finished walls, ceilings	Floor tile, ceramic	81-Mildew in Bathroom	Mildew in Bathroom	Dwelling Units	Mildew in Bathroom	One-time Repair	1

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Accessibility Critical Repairs

View ▾ | Export | Detach

Need Category	Need Item	Component Type	Component	Alternative Name	Repair or Replacement Location	Scope of Required Accessibility Compliance	Action	Quantity
Interiors-Dwelling	Specialties	Bath accessories	73-Install Compliant	Install Compliant	Dwelling Units	Reference UFAS S...	One-time Repair	17
Interiors-Dwelling	Specialties	Bath accessories	74-Install Compliant	Install Compliant	Dwelling Units	Reference UFAS S...	One-time Repair	17
Mech.-Elect.-Plumbing	Fixtures	Baths tubs & sinks	72-Install Levered	Install Levered Showers	Dwelling Units	Reference UFAS S...	One-time Repair	17
Life Safety/Fire Protection	Alarm, Security & Access	Tenant space alarms	75-2% Audio Visual	2% Audio Visual Alarm	Dwelling Units	Existing buildings t...	One-time Repair	7
Interiors-Common	Millwork (doors, trim)	Passage & lock sets	63-Install Accessible	Install Accessible	Common Area	Reference UFAS S...	One-time Repair	47
Interiors-Dwelling	Millwork (doors, trim)	Passage & lock sets	70-Install Accessible	Install Accessible	Dwelling Units	Reference UFAS S...	One-time Repair	17
Interiors-Dwelling	Millwork (doors, trim)	Cabinets & vanities	66-Install Roll-Under	Install Roll-Under	Common Area	Reference UFAS S...	One-time Repair	9
Interiors-Dwelling	Millwork (doors, trim)	Cabinets & vanities	67-Install Compliant	Install Compliant	Common Area	Reference UFAS S...	One-time Repair	17
Interiors-Dwelling	Millwork (doors, trim)	Cabinets & vanities	69-Install Compliant	Install Compliant	Dwelling Units	Reference UFAS S...	One-time Repair	17
Interiors-Dwelling	Millwork (doors, trim)	Cabinets & vanities	68-Install Compliant	Install Compliant	Common Area	Reference UFAS S...	One-time Repair	18

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> Non Critical Repair Needs

> Future Repair Replacements



More Data Reported in CAP

	Alternative Name	Repair or Replacement Location	Scope of Required Accessibility Compliance	Action
Data Displayed:	Install Compliant Grab Bars at Toilets (UFAS) (Critical Repair)	Dwelling Units	Reference UFAS Section 4.34.5.2.	One-time Repair
Data Source:	Alternatives Form	Recommendations Form	Recommendations Form	Recommendations Form

Yet More Data Reported in CAP

	Quantity	Unit of Measure	Unit Cost	Total Cost	Months to Complete	Accessibility Statute or Standard
Data Displayed:	17.	Each	\$1882.35	\$32000.00	0.	UFAS
Data Source:	Components Form	Alternatives Form	Alternatives Form	System Calculated	Recommendations Form	Recommendations Form

The Last Bit of Data Reported in CAP

	Comments	ASTM Section	Utility Savings Per Year
Data Displayed:	The bathrooms in Designated handicapped dwelling units E204, E503, E604, G205, G206, G305, G306, G405, G406, G505, J211, J511, J711, and J811 were observed without compliant grab bars in the showers. The installation of properly sized and located grab bars at the side and rear walls of the showers is required to comply with the UFAS.	3.7.2.4.1	\$0.00
Data Source:	Recommendations Form	System Provided	System Calculated

Source Alternatives Form

Alternatives

Existing Alternatives

Choose Component Type

- Carpet
- Passage & lock sets
- Cabinets & vanities**
- Bath accessories (towel bars, grab bars, etc.)
- Bath/kitchen vent/exhaust fans
- Refrigerator/freezer
- Range, cook top, wall oven
- Environmental remediation alarms
- Environmental remediation pumps & equipment

Existing Component IDs

- 53-Standard Kitchen Cabinets and Countertops (Unit
- 66-Install Roll-Under Approach at Sinks (UFAS) (Critic**
- 67-Install Compliant Kitchen Storage (UFAS) (Critical
- 69-Install Compliant Work Space (UFAS) (Critical Rep
- 70-Standard Kitchen Cabinets and Countertops (Unit
- 52-Standard Kitchen Cabinets and Countertops (Unit
- 54-Standard Bath Vanity Cabinets (Unit)
- 68-Install Compliant Countertops (UFAS) (Critical Rep

Manage Alternatives

Existing Alternatives

- Standard Kitchen Cabinets and Countertops (Unit) **
- Install Roll-Under Approach at Sinks (UFAS) (Critical Repair)**
- Install Compliant Kitchen Storage (UFAS) (Critical Repair)
- Install Compliant Work Space (UFAS) (Critical Repair)
- Standard Bath Vanity Cabinets (Unit)

Component ID & Alternative Pairs

- 66-Install Roll-Under Approach at Sinks (UFAS) (Critical Repair) >

Delete Create Pair

Alternative Name	Install Roll-Under Approach at Sinks (Sustainable Alternative Indicator	NO
Notes			
Unit Cost	\$0.00	Unit of Measure	Each
Type of Utility	N/A	Usage per Year	0.00
EUL	20	Owner Proposed Indicator	NO
TCO	\$0.00	Add	



Source Alternatives Worksheet

Open Form

Alternatives

Component Type	Component ID	Alternative Name
Carpet	51-Carpet - Average Quality (2-Bedr	Carpet - Average Quality (2-Bedroom) (Apartment)
Passage & lock sets	70-Install Accessible Levered Hardw	Install Accessible Levered Hardware at Units (UFAS) (Critical Repair)
Cabinets & vanities	53-Standard Kitchen Cabinets and C	Standard Kitchen Cabinets and Countertops (Unit) **
Cabinets & vanities	66-Install Roll-Under Approach at Si	Install Roll-Under Approach at Sinks (UFAS) (Critical Repair)
Cabinets & vanities	67-Install Compliant Kitchen Storage	Install Compliant Kitchen Storage (UFAS) (Critical Repair)
Cabinets & vanities	69-Install Compliant Work Space (UF	Install Compliant Work Space (UFAS) (Critical Repair)
Bath accessories (towel bars, grab ba	64-Install Scald and Abrasion Sink W	Install Scald and Abrasion Sink Wrapping (UFAS) (Critical Repair)
Bath accessories (towel bars, grab ba	73-Install Compliant Grab Bars at Toi	Install Compliant Grab Barsat Toilets (UFAS) (Critical Repair)
Bath accessories (towel bars, grab ba	74-Install Compliant Grab Bars at the	Install Compliant Grab Bars at the Toilets (UFAS) (Critical Repair)
Bath/kitchen vent/exhaust fans	79-Remove Bathroom Exhaust Fan C	Remove Bathroom Exhaust Fan Cover (Unit)

Source: Recommendations Form

Repair, Replace, Add New Recommendation

Add/Modify by Component Type | View/Delete Existing Entries

Component Types

- Carpet
- Passage & lock sets
- Cabinets & vanities
- Bath accessories (towel bars, gr
- Bath/kitchen vent/exhaust fans
- Refrigerator/freezer

Component IDs

- 53-Standard Kitchen Cabinets and
- 66-Install Roll-Under Approach at
- 67-Install Compliant Kitchen Stora
- 69-Install Compliant Work Space (
- 70-Standard Kitchen Cabinets and
- 52-Standard Kitchen Cabinets and

Alternative Names

Install Roll-Under Approach at Sinks

Recommendations

Component ID:	66-Install Roll-Under Approach at Si	Alternative Name:	Install Roll-Under Approa
When	Now	Life Safety Indicator	NO
Duration	0	Accessibility Indicator	YES
Action	One-time Repair	Accessibility Statute	UFAS
Location	Common Area	Scope of Accessibility Compliance	Reference UFAS Sector
Cost	\$0.00	Scope of Required Replace/Refurbishment	Remove base cabinetry
Time to Complete	12	Comments	The community kitchen and designated handicapped dwelling units E204, E604, G205, G306, G405, G505, J211 and J511 were observed without a roll-under sink. In order to comply with UFAS, removal of the
TCO Savings	\$0.00		
TCO per Year	\$0.00		
Indicated Alternative	Install Roll-Under Approach at Sinks (UFAS) (Critical Repa		

Add Update



What if I Need More Space?

- Why do I need more space?
 - Explain deficiencies exempt based on:
 - UFAS, remedy not possible without altering/moving a bearing wall/structural member
 - UFAS, remedy is an undue administrative and financial burden (narrowly construed, see MAP Guide Appendix 5B Section IV, subsection E, p 100)
 - Explain, clarify remedies selected and why
- Use Narrative form, Section 7.1 Accessibility
 - Reference Flag ID & Occurrence #s, Component ID

More space? Use Narrative Form (Section 7.1)

Narrative	Comment
1.0 Executive Summary	
2.0 Purpose & Scope	
3.1 Overall General Description	
3.2 Site	
3.3 Structural Frame - Building Envelop	
3.4 Mechanical & Electrical Systems	
3.5 Elevators	
3.6 Life & Fire Safety	
3.7 Interior Elements - Common	
3.7 Interior Elements - Tenant	
4.0 Additional Considerations	
5.0 Document Review & Interviews	
6.0 Opinions of Probable Costs	
7.1 Accessibility	<p>Deficiencies identified in Flag XXX occurrences 1 thru 5, all concern inadequate kitchen working space, (36" rather than 40") Unfortunately the unit configuration does not allow expansion of this space without enlarging the kitchen by relocating a unit perimeter wall which is also bearing and cannot be moved without intruding on common hall space and resupporting structural members. No other alternatives exist for achieving compliance absent structural changes (See sketch of unit plan and photos attached as "7.1 Accessibility Deficiencies Exempt"</p>
7.2 Intrusive & Other Examinations	



Possible Alternative-Use a Flag Note

W	DA-003	1	The number of Sensory Impaired Units is below 2%	The property currently does not feature audio/visual alarms in at least 2% of the total number of dwelling units. The Needs Assessor has cited installing audio visual alarms in 2% of the units as a Critical Repair. The audio/visual units should be proportionally spread across the floor plans to the greatest extent feasible.
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Possible Flags Related to Accessibility (#1)

ID	Severity	Description	Cause
DA-001	W	Mobility Accessible Units below 5% of Total Unit Count	Number of Mobility Accessible Units is below 5% for a Unit Type: <SiteID/>, Building: <BuildingID/>, Unit Type: <Unit Type/>
DA-002	W	Accessibility Requirements Identified	Comments field has been left blank or contains an invalid value for an identified Accessibility Recommendation/Decision; see Component: <Component/>, Alternative: <Alternative/>
DA-003	W	Sensory Impaired Units below 2% of Total Unit Count	Number of Sensory Impaired Units is below 2% for a Unit Type; see Site: <SiteID/>, Building: <BuildingID/>, Unit Type: <Unit Type/>
DA-004	W	Accessible Unit not on an accessible path	Inspected Accessible Unit is not on an accessible path; see Site: <SiteID/>, Building: <BuildingID/>, Unit Type: <Unit Type/>
DA-005	W	Fair Housing Act Covered Unit not in compliance	Compliance requirements not met for Fair Housing Act Covered Unit; see Site: <SiteID/>, Building: <BuildingID/>, Unit Type: <Unit Type/>, Unit Number: <Unit Number/>
DA-006	W	Public space does not meet Americans with Disabilities Act (ADA) requirements	Public space does not meet Americans with Disabilities Act (ADA) requirements; see <SiteID/>, Building: <BuildingID/>, Common Space: <CommonSpace/>
DA-009	W	No Fair Housing Act Covered Units Inspected for Unit Type	No Fair Housing Act Covered Units inspected for Unit Type: see Site: <SiteID/>, Building: <BuildingID/>, Unit Type: <Unit Type/>

More Accessibility Flags (#2)

ID	Severity	Description	Cause
DU-004	S	Total Mobility Impaired Units cannot be greater than total units	The total number of Mobility Impaired Units cannot be greater than the total number of units for a Unit Type; see Site: <SiteID/>, Building: <BuildingID/>, Unit Type: <Unit Type/>
DU-005	S	Total Sensory Impaired Units cannot be greater than total units	Total number of Sensory Impaired Units cannot be greater than the total number of units for a Unit Type; see Site: <SiteID/>, Building: <BuildingID/>, Unit Type: <Unit Type/>
DU-006	S	Total Sensory Impaired Units required when Federally Assisted	There are no Sensory Impaired Units defined for the following Unit Type of a Federally Assisted property; see Unit Type: <Unit Type/>
DU-007	W	If building is 2- to 5-story elevator or High-rise, Total Inspected Covered Units cannot be blank	There were no Covered Units inspected in a 2- to 5-story elevator or High-rise building; see not met for Fair Housing Act Covered Unit; see Site: <SiteID/>, Building: <BuildingID/>
DU-008	W	Public space does not meet Americans with Disabilities Act (ADA) requirements	There are no Mobility Impaired Units defined on a Federally Assisted property.

More Accessibility Flags (#3)

ID	Severity	Description	Cause
DV-027	S	Total Mobility Impaired Units field left blank on a Unit Type	Total Mobility Impaired Units field has been left blank or contains an invalid value on a Unit Type; see Site: <SiteID/>, Building: <BuildingID/>, Unit Type: <Unit Type/>
DV-028	S	Total Sensory Impaired Units field left blank on a Unit Type	Total Sensory Impaired Units field has been left blank or contains an invalid value on Unit Type; see Site: <SiteID/>, Building: <BuildingID/>, Unit Type: <Unit Type/>
DV-187	S	Accessibility Indicator field left blank on a Decision/Recommendation	Accessibility Indicator field has been let blank or contains an invalid value on a Decision/Recommendation ; see Component Type: <Component/>, Alternative: <Alternative/>
DU-007	W	If building is 2- to 5-story elevator or High-rise, Total Inspected Covered Units cannot be blank	There were no Covered Units inspected in a 2- to 5-story elevator or High-rise building; see not met for Fair Housing Act Covered Unit; see Site: <SiteID/>, Building: <BuildingID/>
DV-247	S	ADA Compliance Exists field left blank on Common Spaces	ADA Compliance Exists field has been left blank or contains an invalid value on a Common Space; see Site: <SiteID/>, Building: <BuildingID/>, Common Space: <CommonSpace/>

More Accessibility Flags (#4)

ID	Severity	Description	Cause
PI-008	I	Public Accommodation Identified on Common Space	Common Space identified as Leasing/Marketing or Rental Space, check parking ; see Site: <SiteID/>, Building: <BuildingID/>, Common Space: <CommonSpace/>
PI-009	I	Fair Housing Act Covered Building	<BuildingID/> on <SiteID/> must comply with the design and construction requirements of the Fair Housing Act
PV-004	W	Total Accessible Surface Parking cannot be greater than Total Surface Parking	Total Accessible Surface Parking cannot be greater than Total Surface Parking; see Site: <SiteID/>
PV-007	S	Total Accessible Covered Parking cannot be greater than Total Garage Parking	Total Accessible Covered Parking cannot be greater than Total Covered Parking; see Site: <SiteID/>
PV-008	S	Total Accessible Garage Parking cannot be greater than Total Garage Parking	Total Accessible Garage Parking is cannot be greater than Total Garage Parking; see Site: <SiteID/>

More Accessibility Flags (#5)

ID	Severity	Description	Cause
PV-009	S	Total Unit Accessible Garage Parking cannot be greater than Total Unit Garage Parking	Total Unit Accessible Garage Parking cannot be greater than Total Unit Garage Parking for a Unity Type; see Site: <SiteID/>, Building: <BuildingID/>, Unit Type: <UnitType/>
PV-010	S	Total Garage Accessible Parking Spaces cannot be greater than Total Garage Parking Spaces	Total Garage Accessible Parking Spaces cannot be greater than Total Garage Parking Spaces: see Site: <SiteID/>, Building: <BuildingID/>, Common Space: <CommonSpace/>
RR-008	S	Total Accessible Surface Parking is less than 2% of Total Surface Parking	Total Accessible Surface Parking is less than 2% of Total Surface Parking; see Site: <SiteID/>

Questions?

Thank you!

**The Recorded Portion of the
Webinar Has Ended**

Webinar Logistics: Virtual Classroom Portion

- Participants take your phone lines off mute
- Recording is off
- Group discussion
- If technical issues related to WebEx, insert them in the Chat Box

