

## **HUD CNA eTool CNA e-Tool Inspection Sample**

Toni Gallo: Hello everyone. Please mute your phone line at this time. You'll find next to the screen in the WebEx panel, you'll see a little microphone icon near the right edge of the screen next to your name. If you click on this, it will turn red and your phone will be muted. If your PC has a microphone, please make sure it's turned off. Once we get through the initial slide presentation, I will ask you to unmute your phones and that means you'll click on the red microphone icon; it will turn black and your line will be unmuted. And at that point we can talk to each other in the virtual classroom portion of the discussion.

In the meantime, if you have a question, please enter 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. So, in order to have maximum audio clarity it would be great if you guys would not use your computer audio and call into the number provided in your login instructions.

Okay. Well, um, welcome everybody to the virtual classroom on the HUD CNA e-Tool. I'm Toni Gallo. I'm with ICF. We're a contractor that does a lot of work with HUD, particularly with regard to the CNA e-Tool. Thank you very much for joining today. The webinar will focus on inspection samples.

So, before the initial inspections -- before the initial CNA's -- sorry -- a lack of understanding of the requirements for the CNA on particular issues, and in this case, we're talking about unit and common area inspections, has led to some issues that HUD reviewers have brought up. So, HUD has acknowledged that since the inception of the e-Tools, and so it was made available last summer and particularly after it was made mandatory for multi-family deals [inaudible], the submissions have been getting better, which is good news. But today's issue is something that we wanted to talk further about because it's still the issue about inspections and the appropriate sample and the type of sample is still causing some reviewers of HUD to have some heartburn.

So many of the issues have been about the CNA e-Tool submissions in which the sample of units was not in compliance with the requirements specified in the map guide. So, the discrepancies have not been adequately explained in the assessor tool and this is particularly true with regard to inspections of assessable units, which we will get into later in the presentation. So also, many of you probably already know that there will be a separate virtual --

[music playing]

Toni Gallo: Somebody put us on hold. And -- okay great. Thank you. I mean, please put your line on mute please. Okay. Sorry for the interruption folks. Okay.

So folks know that there's a separate virtual classroom on accessibility issues. And the purpose of this session is to present lessons learned and to have a group discussion should you guys want to engage in one after the presentation itself. So, today's presentation or today's webinar will have two parts to it. So, we'll have the recorded portion, which is you are now -- we are now being recorded. Participants are supposed to self-mute. If you need to interact with me, please do

so in the chat box. I have found that in most of these classes that I've done so far, that people wait to ask questions until the unrecorded portion, which is just fine.

If you have a question that cannot wait, please enter it in the chat box and I will try to work it in to the discussion. During this recorded portion, we'll take about lessons learned since the e-Tools have started to be submitted. And we'll talk about -- we'll answer your initial questions, should you have any. And after the formal portion of this webinar, we'll have what we call a virtual classroom. We'll turn off the recording and folks will be able to interact with me as just like it would be a regular discussion. And I urge you at that time, should you want to, please share screens, ask questions to try to get this as clear in your mind as possible.

So again, mute your phone lines if you haven't already done so and the screenshot shows where the chat box is should you have any questions whatsoever. Just to let you know, in about two weeks from today the slides for this presentation, as well as an archive of the webinar will be posted on the HUD Exchange learning management system where you registered to take this course. So, I am recording the presentation. I'm running WebEx and I'm talking, so if you have questions and you put them in your chat box, and I don't get to them right away, just bear with me, I will get to them, I just have to sort of keep my mind on various aspects of the webinar. So just be patient.

So today, what we're going to talk about is how to develop your inspection sample and report on the results of the inspection in a way that helps the HUD reviewer that's reviewing your CNA to quickly review and accept your CNA e-Tool submission. One of the things that we will find out later in this presentation is that a lot of the CNA e-Tool submissions have been rejected out of hand. Now, that doesn't mean that they don't eventually get approved, but a lot of them don't pass the first triage, which I'll get to that in a few minutes. What I also want to make sure is that you'll understand where to access tools and resources that will help you with the CNA e-Tool and that we can discuss problem areas with all of the participants so that we can actually make this meaningful to you, particularly if you have particular questions that you want to resolve.

Okay. So onward to the CNA e-Tool. I want to just take a moment to discuss what's been happening to date. What we want to emphasize here is the fact that the CNA e-Tool is actually gaining traction, people are using it and deals are getting approved, which is the good news. So, we update this table every few weeks. So, this table is current as of May 15th or just a little over two weeks ago, and just to let you know, from March 5th to May 15th, just a little bit over two months, the number of approvals has increased from 43 to 167. So just in over two months, the number of approvals has practically quadrupled.

Okay. So again, you'll see here that the number of approvals 167, is this screen here, and you can see that in these other pieces of the pie, these represent CNAs in various states, either submitted, not reviewed, awaiting decision, etcetera. The only other one that I wanted to bring up was this yellow slice. As of May 15, 223 CNAs were sent back to the lender because they didn't pass the initial triage, which is why we developed this series of virtual classrooms to talk about some of the issues that we've seen popping up in CNAs frequently to try to minimize the occurrence of these issues in the future.

So where do we go to find resources? Okay. So, your best source of information on the HUD CNA e-Tool is the HUD CNA e-Tool webpage on the HUD.gov website, for which the URL is near the top of the slide. Now, one of the nice things is that if you go to your browser and you type in HUD CNA e-Tool, this will probably be the first thing that pops up in your search. So, if you haven't bookmarked it, it's really easy to find, so just so you know. Now on this page, you'll see the latest version of the assessment tool, instructions for the CNA e-Tool, that's the step-by-step instruction guide that tells you how to fill out the tool, and then all of the mortgagee letters and other types of resources that are available about the tool are located on this page.

The next thing is that most of you probably know that on the HUD Exchange at [HUDexchange.info](http://HUDexchange.info) there is a CNA e-Tool help desk. It's called Ask A Question and if you go into the HUD Exchange and you already have an account, when you go into Ask A Question all of the personal identifying information will be auto-populated, so it's really easy to ask the question. You'll have to fill out maybe a couple fields on that first page, then you'll go onto the second page and indicate what your question is about. There will be a drop down menu there and you choose CNA e-Tool and then it'll go to the correct help desk. You type in your question, you submit it. And then HUD has been really trying hard to stay abreast of the questions that they receive and to try to give very thorough and helpful answers. So, I urge you folks to use the Ask A Question resource.

Okay. Just a couple other things before we actually get into lessons learned from the first 500-some-odd CNA e-Tools that have been submitted to date. Okay. So, there are some key resources that have been posted to the HUD CNA e-Tool webpage that I wanted to mention. The assessor tool has had some appearance changes particularly for entering information about parking. So, 1.2, version 5, is the version that is currently on the CNA e-Tool webpage and this is the one that you should use for all new assignments. Don't use earlier versions of the tool. This one has the least amount of glitches. Every time there's a new release of the tool they try to deal with some of the bugs or areas of confusion, so just try to use this latest version.

There's been release 2.2 of the validation and submission portals, and there are some improvements for handling flags and flag notes that are really useful. And then HUD reviewers when they review your CNA e-Tool, and particularly when they're reviewing the 14th and 15th steps, they use the reserve for a place and financial factors tool that's posted on the CNA e-Tool webpage. They use it to actually confirm whether the RFR funding plan meets map guide requirements for the loan applications.

They want to make sure that the projected year-end balance is greater than or equal to the minimum balance in years 3 through 10, and if the minimum balance is not met in years 11 to 20, then the amortization test is applied to the shortfall which may not exceed 50 percent of the accumulative amortization of the proposed loan. So, I would urge lenders to use that tool because if you use that tool and HUD uses that tool, you'll be looking apples to apples, and HUD will be able to see how you arrived at your figures and determine if there are any discrepancies. And for those of you who are using the CNA e-Tool for RAD deals, the RAD program has published a guide explaining how the RAD program uses the tool. So that's a very helpful resource.

Okay. So, lessons learned. So, in the next few minutes what I'm going to be doing is I'm going to be talking about some of the lessons learned and I'll go over each of them in a fair amount of

detail. But what I do also want to do is to illustrate where in the tool itself you look for certain things. So, with that let's talk about some inspection tips. First, I want to get started by providing some salient tips of which needs assessors should be aware when completing the tool.

There are, as I'm sure you've told time and time again, strict requirements enumerated in the map guide, appendix 5G, regarding the numbers and types of units to be inspected, and we'll discuss these shortly. Lenders needs assessors and owners really need to work together to assure that the needs assessors have a complete inventory of units in the recent role so that the workable sample of units to be inspected can be identified before the needs assessor ever gets to the site. Selecting a unit sample on the fly, sort to speak, is a very high risk proposition. You want to at least develop a straw man before you go on the site, so you don't have to worry when you are finally on the site about selecting the correct number and location and type of unit.

So, once you develop your draft inspection sample in the tool, you can put the tool through the public validation engine and review the results to determine whether or not your proposed sample is adequate. You can sort the inspected sample worksheet by building or unit type, which is really helpful because it'll assist you in determining the adequacy of your sample and you can use it also as a check list when you're on site at the property.

So as most of you know, the best laid plans often don't work out as hoped. So, if you cannot get into a specific unit that you planned to inspect, either because the resident is ill or the management staff key doesn't work or for whatever reason, that's okay. But what you need to do and what you need to note somewhere in the e-Tool, is that you try to inspect similar sized unit on the same floor or elsewhere in the building as a substitute. So, when you substitute a unit, obviously you can go into the inspect unit sample tab on your tools and change the number of the unit that you inspect.

So, you can do this while you're on site or right after you go to the site to update the tool to reflect what you actually did inspect. If a change, and in some cases unfortunately it will result in a flag, then by having a sense of what you inspected and why and what substitutions you need to make, will help you because you'll be able to explain quickly in the flag note for that particular flat the reason why you had to make the unit substitution and how you compensated by sampling other units elsewhere in the property.

Okay. So, when you are inspecting a unit on site you have to make sure to designate if the unit is accessible. You have to make sure that you provide the floor on which the unit is located and state whether the unit is a ground-floor unit. Obviously, why? Because if you do that, accessible units have to be on the ground floor that has an accessible path leading to it. So vacant units are easier to inspect and photograph than occupied units.

Okay. If vacant units can be used to achieve an appropriate distribution of sample units, like if there's a large number of vacant units of each unit type, it's okay to inspect those as part of your total number of units inspected because it'll speed up your work because obviously it's easier to inspect a vacant unit than an occupied unit. But you still need to have the same number or percentage of units inspected regardless of whether they're vacant or not vacant.

The assessment tool, and this is actually pretty cool, auto-calculates whether a unit is a covered unit or not per the Fair Housing Act based on answers to key questions. And we will show you that in just a minute. So, if you will kindly bear with me just a moment, I'm going to share a completed copy of the CNA e-Tool. You guys can actually find this on the HUD CNA e-Tool webpage. There's actually an assessment tool that's been completed in a way that HUD would accept, and I often use that particular spreadsheet when I'm providing examples to people. So, if you'd just bear with me one moment I'm going to share that particular tool.

Okay. So, you should all see my spreadsheet now. This is the version control page of the assessor tool. This is Bay View Apartments. And what I'm going to do right now is I am going to show you how to identify a covered unit and also show you how the system determines whether an accessible path is required and then -- so if you -- this is the tool. What I'm going to do first is I'm going to go to the building tab.

And I'm going to look at Building C but I'm going to open the form. So, remember one of the things that we've been hitting you over the head with in the last year when we do trainings on the CNA e-Tool is to try not to type directly on the spreadsheet itself. Open the associated form because if you open the form and you make a mistake, it's much easier to correct it in the form than to notice it on a spreadsheet and forget to go back to the form and fix it.

So, I'm going to open the form here and you'll see once it opens -- and I apologize, I know it takes a little bit of time because this is a really huge file. Okay. So, I'm going to look at Building C. So, if you look here and you see that the year built is 1991 and the occupancy permit date is 4/15/1991, you'll see that the system auto-populates that the Fair Housing Act applies. So why is that? So, any property that's been placed into service that has an occupancy permit date after March of 1991 is automatically covered by the Fair Housing Act. So that's one thing that you need to pay attention to because the units in those buildings that are accessible or that have ground floor access, there must be at least a certain percentage of those that are accessible.

So, another thing that this tells me is that there's three stories. I know that there are three stories because the number of stories above grade is three, number below grade is zero, so there are three stories. So, one of the things that this also tells me is that there's three stories above grade, then floor one is, by process of elimination, the first floor. So that tells me some very interesting information about the property in this particular building. Okay. So, I'm going to go ahead and close out this form.

And now what I'm going to do is I'm going to navigate to the inspected sample worksheet. And I'm going to open the form. Again, I apologize, I know it takes a while. Okay. So, I'm going to look at Building C, the two-bedroom, two-bath B share units. Okay. So, this is unit Number 3. This is a first-floor unit and that tells me that it needs to have an accessible path by default. So, this particular form tells me [inaudible] the building, the unit type, the unit number, the floor number and by default it's covered by the Fair Housing Act, and that is auto-populated.

And when the inspector or the assessor actually inspects the units they have to write -- they have to select whether or not it's compliant with the Fair Housing Act. So, you'll see here they put no. Okay. So, because it's a ground-floor unit and because this is an accessible unit, an accessible path must be present. So, it is needed. And in this particular case, when the assessor looked at

this particular unit they also found out that the accessible path actually does exist, which is good. And then this building is not subject to 504/UFAS requirements.

So, you'll see here the salient things to look at here is that it's a covered unit but it's not compliant. And you'll see here that in the note or in the comments, the assessor put that the patio door opening is 28 and a half inches and with a one-inch threshold and the bathroom door -- and this is 206B -- which is a component. So basically, what they're saying here is that the patio door opening is not wide enough and the threshold isn't the correct width, and that the bathroom door is not wide enough. And I know that because I've looked at the components of this particular deal. So basically, what the assessor is saying here is, yes, we know this isn't in compliance, but this is what we intend to do here.

So, what's nice about having the comments on this particular form is that invariably if one submitted this tool through the public validation portal, a flag would appear because it's a covered unit and it's not compliant. And by having this comment it enables the assessor to directly be able to address that particular flag note. So again, if -- this will definitely result in a flag. And let me tell you folks, the CNA e-Tool, when it was designed there were certain things that HUD really wanted to make sure were covered. One of those things is accessibility.

The reason for that is, because prior to the inception of the e-Tool there were lots of deals that were going through that the accessibility requirements were not being met. And, so, when this spreadsheet was developed, HUD wanted to make sure that there were built-in bells and whistles to determine if anybody was neglecting to include any of the accessibility requirements or accessibility items that would make it in compliance with the accessibility requirements. So, this is a very big deal. And if you ever looked in the user guide at that list of flags, you'll notice that at least 25 flags alone relate to accessibility, so it is a big deal. I'm going to go ahead and close this up, and then I'll actually stop sharing the spreadsheet and we'll go back to the slides.

Okay. So, in general, if you want to read everything you wanted to know about inspection samples, you go to the map guide, Appendix 5, Attachment G, which enumerates when unit inspections are required, under what circumstances, both in general and particular. So obviously if you have new construction you don't have to inspect any units. Why? Because they haven't been built yet. So, in some ways using this tool for a building that has not yet been constructed is a lot easier because you don't have to inspect units, you just have to determine what's going to be put in this building and determine the -- and the tool will actually default to the standard use of life that's in the standard use of life table.

So, you do have to do unit inspections for all properties that will either undergo a Level 2 or Level 3 set of alterations or if somebody is requesting financing that will be insured by HUD requiring an existing property, these inspection requirements are also in play. So, the map guide addresses inspections for Level 2 and/or 3 alterations and for properties for which funds for acquisition or refinancing are being sought.

So, I'm going to talk to you about the Level 2 and Level 3 alteration standard. So right from the map guide, Chapter 5, Section 5.1, which is on page 105 it says, and I quote, Level 2 alterations, the reconfiguration of space, the addition or elimination of any exterior door or window, the reconfiguration or extension of any systems where the installations of any additional equipment.

And then a Level 3 alteration is an alteration where the work area consisting of all reconfigured space exceeds 50 percent of the aggregate area of the building.

So now we're going to get to the minimum inspection sample, which is in 5G of the map guide and on page 144. It says in the map guide that, except for new construction and gut rehab, HUD requires that the assessor enters the minimum percentage of all units that must be inspected. For properties with all structures built or gut rehabbed within 10 years of when the CNA is done, at least 25 percent of units must be inspected.

So, what does this mean? So, this means that there has to be a random sample of all unit types on each floor level in each building. So, in another words, 25 percent is the standard that assessors must use. That means not just 25 percent of units in any building, it means that at least 25 percent units per building and preferably per floor, and preferably you get a good distribution of unit types.

So, I'm going to provide you with a little example about what would be considered a reasonably good unit sample. So, a property has one site with 12 buildings and 144 units. So, of that 144 units, there are 36 one-bedroom units, 72 two-bedroom units and 36 three-bedroom units. So, of the 72 two-bedroom units, half of them are two-bedroom units with one bath and the other half have two baths.

So again, there are 12 buildings and each building has 12 units. There are 6 buildings with 6 one-bedroom units and 6 three-bedroom units. Three floors in these buildings with each floor consisting of 2 one-bedroom units and 2 three-bedroom units. Okay. The remaining 6 buildings in the property have 12 two-bedroom units, 6 of which have one bathroom and the other 6 which have two bathrooms. Okay.

So, the optimal unit sample that would be fully in compliance with the map guide requirements would be basically something like this: So in the 6 buildings with one-bedroom and three-bedroom units, one would inspect one to two one-bedroom units on each floor and one to two two-bedroom units on different floors. And then throughout the property, remember there's 6 buildings with one-bedroom and three-bedrooms units, you want to have inspected at least 9 one-bedroom units and 9 three-bedroom units, and you'd want them an array over the three different floors in the building.

And then in the 6 buildings with the 12 two-bedroom units, you'd inspect one to two two-bedroom one-bath units and one to two two-bedroom two-bathroom units per building, and then you'd ensure that at least 9 two-bedroom one-bath and 9 two-bedroom two-bath units are inspected throughout the property on the various floors. So, depending upon how the buildings are configured and the number of units per unit type, you might not get an absolutely even distribution, but HUD basically wants to know when they look at this assessor tool that's been completed, that you understood the requirements and tried your best to comply with them. Okay.

So, in certain cases you need to inspect a greater number of units. And this has to do with properties that have a history of a very large vacancy rate. So, in this case it's basically over 16 percent in which then not less than 50 percent of the vacant units not already selected for

inspection should be inspected. A property with units or if the buildings are buildings vacant for 6 or more of the previous 12 months, there should be a larger percentage of these inspected.

Why is that? Well, if something's been vacant that long, it's usually due to some kind of adverse physical condition or expensive remodeling or something of that nature, in which case HUD wants to know why. And that needs to be noted in the CNA e-Tool either in a comment, a flag note, the narrative portion of the e-Tool or as an attachment to the e-Tool. Remember, you need to take good advantage of the narrative options in the tool so that you can explain to HUD what's going on.

Okay. So, the next thing I want to do is I'm going to show you, this is a screenshot of the inspected sample worksheet. So, what this worksheet shows, the screenshot shows, the inspected sample worksheet and we recommend that the assessor uses the unit inspection checklist while the assessor's on site. So, you'll note that there is also a virtual classroom schedule on the sorting, sifting and manipulation of data. So, for purposes of inspections, it's nice to know that you can sort this list by building and unit type to assist you in determining whether your inspection sample is adequate. And then, again, we urge people not to type directly on the worksheet but to open the form for each individual unit to be inspected. And then once you do that, it'll populate up to the worksheet itself.

So, I'm going to show you what the form looks like again. So again, here is a screenshot of an inspection sample form much like the one I just showed you a few minutes ago. On the inspection sample form you designate the site building, unit type and number, and whether it's on the ground floor. And then remember that floor levels may be ground levels but not numbered as such.

So per the map guide in Appendix 5, Attachment B, which is page 94, a ground floor is a floor of the building with a building entrance on an accessible route. So just to give you an example, if a building is built on a slope, then in some cases, depending upon where like the back of the building is, in some cases, because of the slope, there might be more than one floor that has accessibility to the outside. So that's very important because both of those floors need to have accessible paths to the units inside in order to be compliant with section 504 and UFAS.

So again, you'll see here on this particular screenshot, the inspection status says inspected. Now, it won't say inspected until it's actually inspected, so this is one of those fields that even if the assessor completes all of the information about the units to be inspected prior to going on site, once they actually inspect the unit they would change this, it's a dropdown menu to inspected. Okay. And then they'd save their changes. Okay.

I just want to put in a plug about intrusive examinations. So, in some properties more units should be inspected rather than less. And sometimes the property will require an inspection that will be considered intrusive because either somebody will have to go behind the walls, look at the plumbing, or somebody will have to do soil samples, or something that would, you know, there might be some damage associated with looking at a particular building and component. If that occurs, and it's really important, that there is an expert that's hired that can do that type of inspection; they would create a report and that report must be attached to the CNA e-Tools, one of the required attachments. Okay.

So as promised we're going to talk a little bit about inspections of accessible units and property features. So accessible units, both those that have features of adaptive use per the design and construction requirements of the Fair Housing Act, and those that are fully accessible to persons with either mobility and/or sensory impairments under UFAS, are generally distributed among all units. So, these units exist at a property, some reasonable proportion of them, but not radically different from the sample percentage of all the units you're going to inspect, should appear on the list of units sampled.

If for some reason the accessible units are concentrated or covered units are concentrated in a building or buildings, this fact needs to be explained, again either on the inspected unit comments field, in the narrative field, or in a flag note, or in an attachment to the CNA e-Tool. So, the reason is because they're concentrated, HUD wants to know they're concentrated, otherwise they're going to want to know that why are you only inspecting accessible units in this one building. So, you can tell them why. Okay.

So, there are flags that will appear at the answer to the federally assisted question on the form, if you yes, but no units are identified as accessible to persons with mobility impairments are included in the sample. So, the same goes true for sensory impairment. Similarly, if a building is indicated as object to the Fair Housing Act design and construction requirements, and no covered units are inspected in that building, then a flag will appear pointing this out. The lender then will be obligated to explain why.

So perhaps in the case of section 504/UFAS, no accessible units exist or only a limited number do, and the required number is not met because doing so would require altering or moving load bearing walls. Or maybe there's no valid exemption and remedies are included in the list of accessibility repairs that will create the additional accessible units required. Or maybe HUD will return the CNA because section 504 applies to these buildings and the requirements are not met. So, there's no valid exemption described and no adequate remedy proposed. Okay.

So again, I know this is a little bit convoluted, but if you have a property and some of the units that are supposed to be accessible don't meet the standard, either you're supposed to remediate those very quickly, and that gets explained in the tool, or if doing so would cause an undue financial burden, such as the load bearing walls need to be moved, you can explain that but if you don't explain it, if you're not going to make something that's noncompliant compliant, you have to have a good reason for not doing so and you have to explain it in the tool.

So similarly, if a building is required to the Fair Housing Act design and construction requirements and no covered units are inspected, then HUD will automatically return the CNA because it is expected that the needs assessor will determine compliance or lack thereof with these requirements. And if none of these units are inspected, then HUD has no way of knowing whether or not the assessor has thought of these units and thought about what needs to change to make them compliant.

It's not required that any fix percentage of covered units or UFAS accessible units be inspected but HUD reviewers should be able to deduce from the results if the portion of such units inspected is dramatically less than the required sample percentage. And the logical result of such a deduction is [inaudible] why? So why if you're looking at 25 percent of the units in a property

and you only look at 3 percent of the accessible units, that's going to cause the HUD reviewer to say, mm, how come you did that, and you want to have a ready answer. So, it's good not to skew your samples too much.

Okay. So, we're getting toward the end of the recorded portion here folks so thank you for being patient.

So finally, the lender is the person that is ultimately responsible for insuring the accuracy of the CNA e-Tool. And why is it? It's because the lender's responsible for aggregating the CNA e-Tool, all the attachments, making sure that the flag notes are available and submitting it to HUD.

So, it behooves lenders to understand some of these requirements, even if they're not expert in building science, just so that they can know, off the bat, whether or not they're going to submit the CNA e-Tools and it will pass the first triage. So, lenders should review the tool to ensure that the correct number of units, unit types, floors, buildings, accessible or covered units are inspected. And this could be a nice check and balance.

And the CNA e-Tool moreover should provide a thorough indication of the project's condition because HUD staff can't see these properties. So basically, the accessor is the eyes and ears of HUD on these properties. So, when HUD gets this CAN, they want to have a good sense that the assessment and the inspections have been thorough enough to really give a true picture of what's going on at that property.

So, the lender should, among other things, ensure that the sample is adequate and if there is deviations from the sample, that the deviation is explained, either in a narrative or flag note. Again, the lender should also ensure that the CNA e-Tool distinguishes between critical and non-critical repairs. And that's important why? Because critical repairs are anything that is a life safety hazard or has to do with accessibility. And the lender should also ensure that the CNA e-Tool describes the replacement of components and major maintenance needs and is compliant with all accessibility laws.

So now we are near the end of the recorded portion of this webinar. I noticed that there were no questions in the chat box, so I'm going to give you a few seconds to determine whether or not you want to ask a question via chat before I turn off the recording.

In the meantime, what I'm going to do in a minute is I'm going to turn off the recording and then ask folks if they want to stay and have a discussion about anything that we talked about thus far.

Folks that are listening to the webinar in an archived form, thank you very much for listening and I'm going to turn off the recording now.

(END)