

[REDACTED]

From: Joe P. Wilczewski [REDACTED]
Sent: Monday, November 4, 2019 2:22 PM
To: Martinez, Sara 6-4144; McMillan, Chris 6-9196; Maddox, Jeff 6-9197
Cc: Andrea Wolford
Subject: revised 2020 QAP - comments
Attachments: Comments to SC 2020 QAP draft (11-4-19).docx

I am sorry I could not attend the meeting this morning but did have a couple comments. Could you please see below and the attached which was sent last month, with updates and deletions.

Comment #1 – is there any scoring criteria for rehabs or just the 4 items A-D on page 28-29 (VIII. Evaluation of Rehabilitation Applications)

Comment #2 – Appendix B is confusing on what has to be done for rehabs. Do any of the items in sections A – U apply to rehabs or just section V?

Comment #3 – Appendix B.V.3.d.iv. 18 cubic foot refrigerators typically do not fit in the kitchens of existing properties.

Thank you again for your assistance.

Joe Wilczewski
Boyd Management, Inc.

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Comments to SC 2020 QAP draft sent October 3, 2019 Updated per revised QAP November 4, 2019

II A Fees – If Agency is going to order appraisals, can we ensure appraisers have USDA RD knowledge and generate appraisal to meet their other needs and requirements as well? No additional information added to new draft of QAP. We need an answer to this to know if we need to budget for 2 appraisals.

V G – Management company portfolio requirements are too extreme. As manager of over 300 properties, there are always a few difficult properties with aged payables (payable to ourselves for fees due), replacement reserves in arrears where RHS has approved servicing workout plans to catch up (many occurred during floods where there was no flood insurance nor could it be obtained). Every property is not perfect – maybe make this that 95%+ properties adhere? They made no change to this section

V H – Every member and entity must have reviews dated 12-31-19 or later? Per prior QAP, it could be a compilation and a year behind. Very doubtful we could get reviews done by 3-31-2020. Do you have to have reviews instead of compilations too? Changed to 2018. Please confirm reviews are now needed rather than compilations.

V R 4b – Can we get waiver for RHS if they require more than \$450/unit in replacement reserve deposits annually? Nothing added to further explain this.

Appendix-Mandatory Design-B – confirm rehabs do not have to have these minimum square footages

O – 15- dryer vents – if an old rehab and hookups are on an interior wall, it may not be possible to vent directly; some have been under units or through ceiling. In extreme cases, would this be acceptable? No changes made to this section. See overall comment #2 confusion on what has to be done for rehabs.

Our earlier comment noting that if any annual monitoring fee is due to a syndicator it should not be considered an annual operating expense on a RHS property as RHS insists this must be paid from the annual permitted owner cash distribution – I do not see it addressed in the QAP or manual but may have overlooked it. Nothing added for this that I can find