		Section 221(d)(4) Checklist	HUD Response
		Section 1: Underwritin	ng
Section	Sub Section	Question	Response
1.2	A	Please confirm if you would like both an MS Word narrative and PDF similar to LEAN.	HUD will accept either format and would appreciate receiving both.
	В	The organizational chart is requested in more than one Section of the checklist, and that the requirement didn't make sense if it was referring to the Lender's Organizational chart. The request is referenced in Section 1-2B, 7-1, and 8-1.	The Organizational chart is for the mortgagor entity and sponsor, not the Lender. We may remove the reference from Section 1-2B in the next MAP Guide revision. In the meantime, insert a duplicate copy or an otherwise blank page referring the reviewer to Section 7-1 for the ownership entity and Section 8-1 for the principal of mortgagor
	С	Third party resumes are already contained in the third party reports. This item can be deleted.	Insert a duplicate copy or reference the location. We'll consider deleting it in the next MAP Guide revision.
	D/E	Please clarify what is entailed with both the "FHA Lender Docs Report" and the "FHA Summary Report".	FHA Lender Docs will be removed in next revision. Check the N/A box in the interim.
1.3	A	The 92013 is not currently optional. Please confirm that your intention is to not make it optional going forward.	Not optional at this time. Because virtually all the information on Form 92013 is also included on the 2264, we may go through the Paperwork Reduction Act paperwork (next year) to make it optional.
	C	HUD 2264 T is unnecessary in this section since it is in 2.1	Either include a copy or insert a blank page marked as N/A or a page referencing the reviewer to the location.
1.4		Will HUD provide an MS Word draft of the Firm Commitment?	Yes, in a future MAP Guide revision. In the meantime, the exhibit is optional. If the Lender wishes to include the exhibit, consult with the local HUD processing office for a copy of their Firm Commitment template.

	A	If there is a specific format HUD would like to see for "Exhibit A: Special Condition", if so please provide an MS Word template	No. Lender should insert any recommended "Special Conditions" or check the N/A box.
	С	Requires the Lender to prepare a draft firm commitment and include the index of drawings and specs. The former is not required by the MAP Guide, and the latter is included in the Plans.	Some Lenders have submitted draft a Firm Commitment form and submitted it with the application. This is not at this time required or expected, but if the Lender wishes to do so, Section 1-4 is the place to put it. Otherwise insert a blank page stating "N/A". Cut and paste from the architect's review documents the Index of Drawings and Specifications list and include in section 1-4.C. Or insert a blank page referencing the reviewer to the document location.
		Section 2: Third Party Re	ports
Section	Sub Section	Question	Response
2.1 **		Industry reviewers questioned the need for an additional appraisal report in Section 2-1 "Third Party Reports". Why is the request for the HUD – 92264 included twice within the checklist? The appraisal forms are also included as part of Section 1-3 "HUD Underwriting forms".	Both the appraiser and the lender's underwriter are required to complete a 2264 form. The Lender's third party appraisal should be included in Section 2-1 "Third Party Reports". The appraisal needs to contain the forms listed, and the Lender should simply check the boxes that these forms are included. The Lender is not required to replicate the form. Note : 2-1.B. lists the HUD 92264-A. This form is not required from the Appraiser as it is an underwriting document. Some Appraisers include it; just check either the "N/A" or "Included" box as appropriate.
2.1		HUD-92264-T should be included in this section, rather than Section 1.3C	Include it here, or in both places.

2.3		The documents in Section 2-3, Environmental-Lead Paint (E) and ACM (F) assessments, are also requested in Section 4-4. Other required submission items in Section 2-3 include (Flood Insurance, subsection (G)) and the (State Historical Preservation letter, subsection (H)). Many of these should be included within the Phase One report, if applicable. Having individual submission items may cause confusion.	We will in the next MAP Guide revision, remove references to the Lead based Paint and Asbestos documents from Section 4-4. In the meantime, include the assessments in Section 2-3, and in section 4-4, either link the documents or insert a blank page noting the location. The Lender's third party Environmental Report(s) should be included in Section 2-3. A. "Third Party Reports". The Lender should simply check the boxes in 2-3. B through K, that the information is included or not applicable. The Lender is not required to replicate the form. In future more automated submissions; we will link to those documents.
	E / F / G / H	Many of these should be included within the Phase I report if applicable. Having individual submission items might cause confusion. The notable exceptions would be the O&M plans, which are often bound outside of the report.	Section E & F (Lead Paint and Asbestos) are not found in the Phase I report. Section G & H are included in the Phase I and will be revised in the next revision of the MAP Guide.
	G.3	We are assuming that an "Elevation Certificate" is <b>only</b> required when a floodplain exists within the building footprint.	HUD Survey Instructions, form HUD 92457A-M, require elevations for the lowest habitable finished floor and basement for each primary building where any portion of the site is subject to flood hazard. Otherwise, check "N/A".
	К	We are assuming the following reports should also be included here: Mold & Moisture, Seismic Report, Noise Assessment, Termite/Wood Destroying insect report.	Seismic reports should be included as part of the architectural package. LBP, radon, noise are considered environmental and should be included here.
2.4	В	Section 2-4 requires an "as built" survey as does Section 5-3.	In the next MAP Guide update, the only reference to the survey will be listed in Section 5-3, Titled "ALTA/ACSM Land Title Survey." In the meantime, Lenders should mark the request for an "as built" survey as "Included" or "N/A" in Section 2-4, under "Architectural Analyst Report" and insert a blank page referring the reviewer to its location in Section 5-3.
2.5		HUD Form 92328 for Lender, Borrower, and Cost Analyst should be included here, rather than Section 4.5.	Agreed, for the majority of the time this report would be included in Section 2.5 except for an isolated case such as TAP. Either duplicate or otherwise insert a blank sheet and reference the reviewer to the location.

	Section 3: Management Agent				
Section	Sub Section	Question	Response		
3.0		Some of the items listed in Section 3 for the management agent need to be separately bind for privacy reasons such as the 2530 and the credit report.	The comment is noted. Hard copy submissions should be separately bound and marked confidential. The electronic copy of any privacy sensitive documents can and should be password protected.		
3.1		Is an org chart for a management agent relevant or even necessary?	It may be if there is an Identity of Interest with the mortgagor. If not relevant or necessary, insert N/A.		
3.2	E	The Management Agreement is requested twice in section 3-2 and section 3-3. The second reference should be removed.	Agreed. Section 3-3 will be removed in future revision of the MA Guide. In the interim insert blank page and reference the reviewe to the document location.		
	F	The process of addressing tenant complaints and Exhibit 3-2 G is a schedule of staffing to be charged to the project. But the Management Plan in Section 3-2.D will have these documents also, so the requirement is duplicative.	Check the box that it is included in Sections 3-2.F. and 3-2 G, and provide an electronic link to the document, and either provide a duplicate copy, or insert an otherwise blank page referencing the reviewer to the location within the Management Plan exhibit.		
	н	If the "Management agent training and compliance procedures" are covered the form HUD-9832, then this exhibit should be removed.	Typically we see a more substantive presentation. If the 9832 discussion is adequate, insert a page and reference the exhibit location.		
3.4		This is not currently a submission item. It appears to be asking for a type of REO schedule, which is only required for key principals of the mortgagor. The resume of the management agent should be sufficient to prove the necessary level of experience required to manage a HUD-insured property	The intent is to address previous experience in similar type and size properties the management company is currently and/or previously managed. We may reword this item in the next MAP Guide revision. In the meantime, either address the issue here or insert an otherwise blank page referencing the reviewer to the location, e.g., in the resume.		

Section	Sub Section	Question	Response
4.1		Specific plan items needed for pre application should be listed.	We will consider this in the next MAP Guide revision. In the interim, pre-application items are listed in the MAP Guide under the Addendum 4A & 4B.
4.3		Request for local plan approval. Typically plans are still being reviewed by local building departments while the application is being processed by HUD. Due to other HUD changes that could be requested a municipality may not approve plans at this stage. Building permits are issued and delivered to HUD at closing and is what generally documents local building department approval; and depending upon the municipality an approval of the plans may not always be available at submission.	If the plans have been approved, insert it in this exhibit and check "included." If not, insert an otherwise blank page noting that this will be addressed at closing and check the box "N/A."
4.4		These reports are already covered under Section 2-3E and should be removed from this section.	Agreed, Lead Paint is covered in Section 2-3 E. Will remove from this section in a future revisions of the MAP Guide.
4.5		Requires Form HUD 92326, Detailed Cost Estimate. This is another form that is already provided in the Lender's Cost Review report in Section 2-5.	We may (or may not) delete one of the 2 references in the next MAP Guide revision. In the meantime, either provide an electroni link to the document and either include a duplicate copy or insert a page referencing the reviewer to the document location.
4.7		This item requests a Construction Progress Schedule per AIA A201, the Lender's architectural and cost reviewer already requires a HUD Form 5372, Construction Schedule in Section 2-5.	The HUD Form 5372 may be used to address the Construction Progress Schedule per the AIA A201. Provide an electronic link to the document and either include a duplicate copy in Section 4-7, or insert an otherwise blank page noting the document is include in Section 2-5.

4.8		We're assuming that the Early Commencement Documents are referring to the early commencement of construction. This seems to be a leftover from the LEAN new construction checklist, and is not applicable for multifamily at Firm Application submission.	Correct, this is referring to an Early Construction Start authorization. We will clarify in the next version of the MAP Guide.
4.9		This section calls for a GC's commitment letter or surety from a bank for a letter of credit regarding the assurance of completion. Typically we provide the GC payment and performance bond or letter of credit at closing.	If this is the case, insert an otherwise blank page noting whether a Performance and Payment bond or a Letter of Credit will be used (or that the decision has not yet been made), and that this will be addressed at closing. Check the box "N/A."
4.1		This section calls for information on off-site storage of building materials. If this occurs, it typically occurs during construction, not during firm commitment processing.	While it might occur during construction, the Lender should be underwriting what is planned or anticipated. If the Contractor plans off-site storage of building materials, it should be addressed in the application. If it is not anticipated, check N/A.
4.12		Will a consolidated certification be provided? This is the only architect certification listed in this checklist.	A separate Design Architect certification is required.
		Section 5: Legal, Property Documents &	Misc. Requirements
Section	Sub Section	Question	Response
5.2	B&C	This section requires a Pro forma Title Policy noting exceptions. This is typically prepared as a draft closing document and will no doubt change if required to be submitted in the Firm Commitment application stage.	We typically get a Pro forma Title Policy at Firm Commitment stage, and expect the Lender's underwriter to review it and the exceptions carefully as part of the underwriting. If the lender isn't able or willing to obtain a preliminary report, or (as in some states) they aren't available on a preliminary basis at the Firm stage, the Lender should insert an otherwise blank page noting the fact, and check the boxes "N/A."
		Is it mandatory to submit the up-to date Pro Forma Title with the application, or can it be submitted prior to initial endorsement?	It can be submitted prior to initial endorsement.

5.3		Aside from the listing of easements on the title, are full agreements necessary, or can we provide a summary of the proposed agreements if they have not yet been drafted?	A draft form of the easements and maintenance agreements should be submitted at Firm. If they are not available, provide a summary, submit the final versions with the Closing documents, and include a recommendation for a Special Condition noting and acknowledging the Closing will not be scheduled until after HUD has reviewed the documents.
5.4	B/C	Can this be addressed by the A&E and Cost Reviewer or is a confirmation letter from the local authority required?	Either is acceptable - provide evidence of compliance by the third- party Arch/Cost Reviewer or an approved local Building permit or such other documentation as appropriate.
5.8	В	We are assuming that the FHA-1708 is only required if a tax abatement is part of the proposed transaction.	Correct. (Use the HUD Form 91708.)
		Section 6: Additional Funding Re	quirements
Section	Sub Section	Question	Response
6.2	Sub Section	Question Requires an itemization of issuance costs and an explanation for the necessity of each cost The implication is HUD shouldn't be questioning this.	<b>Response</b> Typically this information will be self-evident in a statement of all mortgageable and non-mortgageable sources and uses, which should be copied here or referenced. The statement should explain items that are not self-explanatory.

6.3	F	This item is no longer required pursuant to Tax Credit guidance.	For RAD deals that include HAP Contracts or Section 8 assistance SLR is still required. For applications with only LIHTC and FHA insurance SLR is not required.
		Section 7: Mortgago	r
Section	Sub Section	Question	Response
7.4		The reference to the "Resume" at the end of the line item should be deleted since the Mortgagor resume is the next item on the checklist.	Agreed, in the next revision of the MAP Guide this reference will be removed.
7.5		Requires the resume of the Mortgagor. We think this should be the Project Sponsor and their development team as HUD requires a Mortgagor entity to be a single asset entity. Most will also be newly formed and have no credit or operating experience.	The comment is noted and we will address this in the next revision of the MAP Guide. The Lender should provide a resume of the entity or entities that they think is relevant in the context of a particular transaction.
7.6		This states that credit reports are required for each <u>new</u> principal. Currently, all principals need 2530 and credit reports, not just new principals.	Correct. The reference to "new" will be removed in the next Map Guide revision.
		Remove the reference to the TPA.	Agree, this reference will be removed in the next MAP Guide revision
7.7		Asks for the financial statements of the mortgagor as does Section 7-8. In Section 7-7 B, the mortgagor is a single purpose/asset entity and not an individual. In Section 7-8, the mortgagor is a single purpose/asset entity and not an individual. The REO and maturing debt schedule are required of key principals. Those two documents should be removed. Should the reference to the HUD Form 92417 be removed?	We will address this in the next revision of the MAP Guide by deleting Section 7-7.B., and Section 7-8, which is included in Section 8-6 and is duplicative. In the meantime, simply check "N/A" and insert an otherwise blank page referring the reviewer to Section 8-6. The intent is for the underwriter to use Form 92417 as guidance in describing the mortgagor entity.

8			It would be helpful if this section either specified whether or not the required documents are only necessary for Key Principals, or was broken out into two separate sections, one for the Key Principals and another for Principals. In its current iteration, please provide clarification on whether we are required to complete each exhibit for every principal or just the KP.	The regulatory definition of principal is one that owns 25% or more interest in the ownership of the project; "key principals" subject to full credit review - including submission of financial statements - are determined by the Underwriter. The exhibit submission should reflect your underwriting analysis of who the Principals are. The exhibit checklists and submission listing should be used to accommodate the appropriate analysis and submission, not the reverse.
Se	ection	Sub Section	Question	Response
			Section 8: Principal of the Mo	ortgagor
7.	8		These exhibits being all grouped together - SREO, Maturing Debt, Certification of Existing Indebtedness and Property Financials (3 years) – makes it difficult to see what needs to be collected. Perhaps break these up with A, B, C, etc.? In addition, it appears many of the these documents - with the exception of the Certification of existing indebtedness - were already requested in Section 7-7. Finally, the REO and Maturing debt schedules are required of Key Principals and are not applicable for the Mortgagor entity. Those two documents should be removed.	Agreed to the extent they could be grouped in a more efficient matter. We will clarify the request in the next revision of the MAP Guide.
		В	Personal financial statements are not applicable in this section.	Agreed, this request will be removed in the next MAP Guide revision. In the interim check N/A
7.	7		Shouldn't these be under Section 5: Property Documents, since these will be property financials, similar to the LEAN checklist? It would be helpful if these were broken up in sections like in Section 9-5 through 9-8, and in the LEAN checklist.	This is a request for the Mortgagor's financial statements for 3 years not the property's financials. The next MAP Guide revision will expand this section to the same format as Section 9-5 through 9-8.

8.6		It would be helpful if this were broken up in sections like it is in Section 9-5 through 9-8, and in the LEAN checklist. It might make sense to break down the financials, so each year is its own section. Three years of financial statements is not always necessary (e.g. for a principal who is an individual).	Breaking the section into more sections will be considered in the next revision of the MAP Guide. When less than three years of financial statements is appropriate, then submit what is appropriate.
8.7		This entire section should probably be relocated to a new tab, because it has not previously been a requirement for the principals to all sign these documents.	Agreed. This section will be removed or relocated to a new section in the next revision of the MAP Guide.
		Is Assurance of Compliance the same thing as the Compliance Searches? What is HUD looking for?	The Assurance of Compliance is included in the new Borrower's Consolidated Certification. This reference will be deleted in the next revision of the MAP Guide. In the interim insert a page referencing the reviewer to the document location.
		The Borrower's Oath is a closing item and should not be included in the Firm Application checklist.	Agreed. This item is a closing item and will be removed in the next MAP Guide revision.
		HUD-2283 is not applicable for the Firm Application and should be removed.	Agreed. Check N/A.
		Section 9: General Contra	actor
Section	Sub Section	Question	Response
Section 9 Header "Inserted in Mortgage Credit Binder"		Should this reflect the same wording as Sections 7 and 8?	Yes, this should be submitted as a separate credit binder if the GC information includes a credit report and 2530 APPS process.
9.2		Please confirm that either the APPS certification or paper copies of the 2530 are acceptable.	Either one is acceptable.

9.3		Is the Contractor the only entity that will be subject to providing a consolidated certification? Is this to be similar to the ones used for LEAN deals?	Similar to LEAN, and per industry requests for efficiency, Multifamily will implement consolidated certifications in the future. We will be providing a Borrower's Consolidated Certification for use separately. In the meantime, include the various required certifications for the other parties in the following locations: Management Agent - Section 3-2, 3-5; Mortgagor - section 3-1, 5-1, 7-4; Principal(s) of Mortgagor - Section 8-4
9.3		What is the Contractor's Consolidated Certification? Is that like a super (combined) certification? If so, why are we not requiring this for the Mortgagor and other Principals? Is this the only entity that will be subject to providing a consolidated certification? Please see the General Comments page for further discussion of the consolidated certification.	The Contractor's Consolidated Certification has been incorporated into the Borrower's Consolidated Certification. This will no longer be required once the Borrower's Consolidated Certification is officially adopted.
9.4	A	Risk associated with Contractors other Business Concerns" is unclear, or is addressed elsewhere in the application or Lender's Underwriting Narrative.	The Lender should evaluate the risk of the Contractor's capacity to complete the subject property construction in light of their other business activity. Link or duplicated that write up and check "Included" or insert an otherwise blank page and refer the reviewer to where it is addressed elsewhere in the application.
9.4	A	Please confirm if this exhibit is referring to the 10% sampling of the GC's Other Business Concerns. If it is Other Business Concerns, then this should be rewritten as it relates to the risk that should be covered in the lender's narrative.	Yes, this is referring to a 10% sampling of Other Business Concerns. It is acceptable to just insert an otherwise blank page directing the reviewer to the page in the Underwriter Narrative. We'll consider whether the item can be deleted when we revise the MAP Guide.
		Items No Longer Requir	ed
#	Section	Item	Response
1	1.1	If the project is a Section 220: Evidence that property is in eligible area	Required for pre-applications, MAP Guide checklist Section 220 only
2	1.1	Contact list	Optional, helpful for processing applications.
3	1.1	Site Inspection Authorization	Oral authorization is acceptable.

4	1.1	Joint Inspection (for sub rehab)	List as "N/A", we'll delete when the MAP Guide is revised.
5	1.3	HUD-92013 E Supplement Application and Processing Form for the Elderly/Disabled	Required MAP Guide checklist.
6	1.7	Site photographs provided by the Lender	Required MAP Guide checklist.
7	1.8	MAP Underwriter approvals	The comment is not clear. The lender needs to advise HUD who the Underwriter will be, but the checklist intentionally doesn't address it.
8	2.3	Form HUD-4128	Required and included in Environment report, MAP Guide checklist and Standardized Checklist.
9	3.2	Evidence of property, liability and fidelity bond insurance	Required MAP Guide checklist and Standardized Checklist. Evidence of liability and fidelity bond insurance at closing.
10	3.2	Leasing Plan	Required and Included in the Management Plan.
11	3.6	Management Analysis Performed by the Lender exhibit	Required at Firm MAP Guide checklist.
12	3.6, 7.5, 9.3, 8.3	Verification of TIN/SSN for Management Agent, Mortgagor, GC and Principals	Required at Firm MAP Guide checklist.
13	4.0	Noise Certification	Included in Form 4128
14	4.2	Details of the plans required at each stage. For example, site plan, etc.	Required at Firm MAP Guide checklist.
15	4.5	Detailed Scope of Work for Rehab Work	Required at Firm MAP Guide checklist.
16	4.10	5H.1 Certificate of Professional Liability Insurance	Required at closing.
17	4.10	Architect's Work Write-Up (sub rehab)	Required, Chapter 5 of the MAP Guide
18	4.10	Architect's resume, license, and evidence of professional liability insurance	Required. Part of the third-party report secured by the Lender
19	4.11	Overview of the Off-Site Improvements	Required on Standardized Checklist.
20	4.12 or A/E Report	Certification of Energy Saving Items at Property	Optional, discussed at Concept meeting should be incorporated in the final construction contract.
21	4.13	Developer's Agreement for Non-Profits	Required at Firm MAP Guide checklist.

22	5.1A	Evidence of Site Control	Required at Firm MAP Guide checklist and Standardized Checklist.
23	5.3	HUD-92457 Surveyor's Report	Required at Firm as noted in MAP Guide and as a closing document.
24	5.9	Section 8 HAP Contract (if applicable)	Required at application in Standardized UW Narrative
25	5.9	Section 8 Rent Schedule (if applicable)	Required at application in Standardized UW Narrative
26	7.2	Good Standing Certificates	Required as a closing document
27	7.4	REAC/MOR reports	HUD to pull current REAC?MOR Reports
28	7.4, 9.4, 3.2	HUD-92013-Supp's for Mortgagor, GC and Management Agent	Required at Firm MAP Guide checklist.
29	7.4, 8.4, 9.4, 3.2	Verification of Deposits. Please clarify if bank statements and investment statements are adequate evidence for verification of deposits, similar to the statement that the credit report is confirmation of trade references.	Required at Firm stage. Bank statements and investment statements are adequate evidence for verification of deposits.
30	7.4, 8.4, 9.4, 3.2	Verification of Trade References	Required at Firm. Included in the credit reports of the principals, management agent.
31	7.5	Identity of Interest Disclosure for mortgagor/mortgagee	Required at application in Standardized UW Narrative and MAP Guide checklist.
32	7.6 / 8.5	Credit Authorizations	Required at Firm MAP Guide checklist. Will be included as part of the Borrower's Consolidated Certification.
33	7.6, 8.5, 9.4	Sampling of credit reports for other business concerns for mortgagor, principal and GC	Required in MAP Guide Chapter 8, incorporated as part of UW Due Diligence.
34	7.7, 8.6, 9.5	Statement of Changes in Financial Position / Equity	Should be included in the UW Narrative and as part of the financia statement submission.
35	7.9	Financing Plan	Included in the Standardized UW Narrative, under sources and uses.
36	7.9	Payoff Statement, Outstanding Indebtedness Cert, and 2 year's worth of payments	Required. Included in the credit report, or financial requirements for closing- HUD 2283. Unsure of 2 year's worth of payments??
37	7.9	Insurance bill	Required. Due Diligence at underwriting stage.
38	7.9	Property tax bill	Required. Due Diligence at underwriting stage.
39	8.2C	Limited Liability Corporate Investor certification (LLCI)	Required for Tax Credit projects. Will be incorporated into the

			Borrower's Consolidated Certification.
40	9.0	GC License	Required as part of the third-party report received and reviewed by the Lender.
41	9.0	GC Insurance certification	Required as part of the third-party report received and reviewed by the Lender.
42	9.3	Identity of Interest Disclosure for GC/mortgagor	Required and requested in Underwriter's Narrative
43	9.4B	Working capital calculation by GC and lender	Optional, Completed by HUD's underwriter at time of Firm Commitment.
44	9.5	GC list of jobs in progress	Should be included as part of the GC's resume and part of the third party report received and reviewed by the lender.
45	Unknown	Sponsor's Continuing Commitment Certification	Included in MAP Guide Chapter8, page 226, recommend deleting this requirement, not enforceable as a written statement. Operating agreement or Limited Partnership Agreement would include this information.
46	Unknown	Evidence from Lender regarding Permanent Mortgage Financing Charges	Required, included in submitted sources and uses, in the Standardized UW Narrative.