



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

ASSISTANT SECRETARY FOR HOUSING-
FEDERAL HOUSING COMMISSIONER

MORTGAGEE LETTER 2016-26

TO: Principals/Sponsors
Needs Assessors/Due Diligence Providers
Multifamily Mortgagees
Multifamily Satellite/Regional Center Directors
Program Center Directors
Field Office Directors
Production Chiefs
Technical Branch Chiefs
Account Executives

SUBJECT: Implementation of the CNA e Tool: Automating Capital Needs Assessments, and Related Policy Changes

With this Mortgagee Letter, the Department of Housing and Urban Development (HUD) introduces new Capital Needs Assessment tools, and consolidates and aligns due diligence methods for Capital Needs Assessment. The tools, collectively called the CNA e Tool, and associated protocols, will be encouraged and optional for a period, and then will become the required format for Capital Needs Assessments for many HUD programs on a timeline as further detailed in this Mortgagee Letter.

I. PURPOSE

A. Background

In 2010 the Domestic Policy Council convened the Rental Policy Working Group (RPWG) to engage the Departments of Treasury, Agriculture (USDA-Rural Housing Service) and Housing and Urban Development (HUD) to align their policies, and practices applicable to the multifamily housing industry. Interagency working groups, in consultation with industry leaders, identified key areas where alignment of agency requirements would improve efficiency, and reduce costs for multifamily owners and industry practitioners. One area of focus was Capital Needs Assessments (CNAs), and the need to align the numerous and often conflicting protocols and standards for preparing and using CNAs. ("CNA" is used here to include similar

assessments referred to by other terms such as PCA- Physical Condition Assessment, PCNA – Project Capital Needs Assessment, etc.)

RPWG recommendations were published in 2011, including a proposal to create a standard, automated, electronic template and process for CNAs for use by various agencies and programs, and available for use by all multifamily industry participants. HUD and USDA undertook this effort in 2012, and engaged industry participants and agencies to identify best practices, and develop the electronic solution and training and technical assistance resources. The CNA e Tool is the result of this collaboration.

The CNA e Tool and training and technical assistance resources for users are released in conjunction with this Mortgagee Letter, and will continue to be developed. The CNA e Tool, and all associated components can be found at the CNA e Tool home page:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/cna

B. General Objectives of Capital Needs Assessments and the CNA e Tool

The broad objectives of the CNA e Tool reflect both due diligence and capital planning purposes typical of CNAs, as well as the speed, efficiency, consistency and accuracy achievable from automated systems. The purposes of CNAs include:

- Description of the physical features or inventory of a multifamily property and an assessment of its condition or state of repair and durability.
- Identification of the property's current and future capital repair and replacement needs, estimated in dollars, and the preparation of a financial plan necessary to meet those needs.
- Identification, specification and cost estimation of immediate repairs, replacements or new items to be added:
 - To correct observed conditions needing immediate or early action to address threats to life or health, and/or violations of statutes, rules or codes; and
 - To minimize operating costs of housing through energy and water conservation measures, and to improve indoor air quality through the use of sustainable building components and systems;
 - To compete effectively in the multifamily marketplace.

The objectives of the CNA e Tool as an automated information system include:

- Creation of a standardized format, nomenclature, metrics and methods of calculation supporting reliable and rapid exchange, transfer and use of CNAs;
- Enabling web-based preparation, validation and submission of CNAs;
- Faster and more accurate work processes including automated work flow, task management and workload sharing for agency staff;

- Creation of rule based data gathering and review to improve compliance with statutes and rules, and to support consistent review and underwriting of projects over time and across regions, programs, and Agency offices; and
- Aggregation of CNA results in a database and development of analytic tools and comparative indices as feed-back to users and support for policy formation.

C. Implementation of the CNA e Tool in HUD Programs

This Mortgagee Letter describes:

1. The implementation schedule for invited use, then mandatory use, of the CNA e Tool;
2. Which HUD programs will use the CNA e Tool for preparation of CNAs to fulfill program requirements for CNAs;
3. System user access credentials and methods;
4. Training and self-help resources, technical assistance and help desk resources available to users.

D. Standard Names

To avoid confusion and to aid communication all due diligence documents prepared for properties participating in programs of the Office of Multifamily Housing and variously referred to as physical condition assessments, project capital needs assessments, physical needs assessments and variations thereof are now renamed and are hereafter known as Capital Needs Assessments. The common name for the combination of software, and systems tools herein described for the preparation of Capital Needs Assessments is the “CNA e Tool.”

II. IMPLEMENTATION CALENDAR AND PROGRAMS COVERED

A. Calendar for Implementation

All program participants and their third party CNA providers are invited, and encouraged to begin using the CNA e Tool for the preparation of CNAs submitted to HUD beginning on January 15, 2017. Participants include all Multifamily Accelerated Processing (MAP) lenders originating or servicing insured multifamily mortgages, owners of assets supervised by the Office of Asset Management and Portfolio Oversight for which CNAs may be required, owners and Participating Administrative Entities (PAEs) engaged in Mark to Market (M2M) restructuring, and Public Housing Agencies and owners participating in the Rental Assistance Demonstration (RAD). Use of the CNA e Tool will be voluntary for all CNAs submitted through June 30, 2017. **All CNAs submitted to HUD on or after July 1, 2017 must be submitted through the CNA e Tool to fulfill program requirements for a CNA. This requirement applies to all programs identified in paragraph B below.**

B. Applicability to HUD Programs

This Mortgagee Letter does not apply to any Section 542 Risk Share properties, to any healthcare assets (Section 232, 242 or Title XI), nor to assets of any Public Housing Authority except those as may be proposed for the Rental Assistance Demonstration (RAD). On and after July 1, 2017, CNAs required by the following programs must be submitted using the CNA e Tool:

Office:	Programs	Special Notes/Exclusions:	Implementation triggering event
Office of Multifamily Production* (insured mortgages)	Refinance/Acquisition Section 223(a)(7) & 223(f)	CNA prepared by lender's needs assessor, submitted by lender	Date of Firm Commitment application submission
	Substantial Rehabilitation less than gut rehab Sections 220, 221, 231	CNA prepared by or under supervision of Project Architect, submitted by lender	Date of Firm Commitment application submission
	New Construction or Substantial Rehabilitation (gut rehab) Sections 220, 221, 231	CNA prepared by Project Architect & lender Construction Analyst; Property Inventory & Future Replacements only, submitted by lender	Date of Firm Commitment application submission
	Supplemental Loans (Section 241(a))	When funding repairs, replacements or additions, prepared by lender's needs assessor, submitted by lender	Date of Firm Commitment application submission

Office:	Programs	Special Notes/Exclusions:	Implementation triggering event
Office of Recapitalization**	Mark to Market Restructuring	CNA prepared by needs assessors per existing M2M scope of work, reviewed and submitted by PAE	Date PAE completes their initial due diligence
	RAD-Rental Assistance Demonstration without insured mortgage financing	CNA prepared by needs assessor per existing RAD scope of work, submitted by PHA	Date of Financing Plan submission

Office:	Programs	Special Notes/Exclusions:	Implementation triggering event
Office of Asset Management & Portfolio Oversight***	10 year update CNAs for assets with insured mortgages	CNA prepared by needs assessor, submitted by servicing lender	10 th anniversary of final endorsement
	Partial Payment of Claims or Loan Modifications		Per Mortgage Letter 2010-32-date of needs assessor site visit
	Section 202-811 w/PRAC assistance, but not an insured mortgage transaction	CNA prepared by needs assessor, submitted by needs assessor	Date of needs assessor site visit.

*See MAP Guide Appendix 5G for detailed instructions by insured mortgage programs, and property characteristics which guidance is applicable to RAD, M2M or Section 202 refinancing when an insured mortgage is proposed.

**See existing guidance for RAD at PIH Notice 2012-32; the CNA e Tool replaces the RAD PCA Tool. For M2M see HN 2013-25, and existing guidance in M2M PCA Statement of Work. The CNA e Tool replaces the M2M Green PCA Tool.

*** See Asset Management HB 4350.1, existing program guidance and Housing Notice 2013-17.

III. SYSTEM ACCESS AND USER CREDENTIALS

A. System Summary and Access

The CNA e Tool is a suite of coordinated tools that support three basic tasks in managing CNA data. These are:

- Gathering data, i.e. needs assessors or project architects preparing the CNA;
- Submitting data, i.e. lenders or servicers underwriting, certifying and submitting a CNA or PAEs or PHAs submitting CNAs and in a few instances needs assessors submitting CNAs; and
- Reviewing data; i.e. HUD staff reviewing and approving or rejecting a CNA.

Each of these basic tasks engages different participants using a particular subset of the tools employing different credentials and methods of access. The following table illustrates the three basic tasks and corresponding tools, participants, credentials, and means of access.

	Prepare CNA-gather data	Submit CNA- certify data	Review CNA- approve/reject
Who?	Needs Assessors	HUD Map lenders/servicers, PAEs, PHAs, and some needs assessors (only for certain uninsured assets)	HUD staff
Tool?	Excel Assessment Tool & web based Validation Engine	Web based Submission Portal	Web based Reviewer Tool
Access url?	Download Excel Assessment Tool from CNA e Tool homepage. Access Validation Engine at: http://webapps.hud.gov/CNAeTool/faces/CnaValidation	FHA Connection; https://entp.hud.gov/clas/index.cfm <u>Or WASS:</u> https://hudapps.hud.gov/HUD_Systems	https://hudapps.hud.gov/ssmaster
Credential?	None needed	M ID for MAP lenders/servicers, PAEs or PHAs; I ID for needs assessors (only for certain uninsured assets)	H ID or C ID
Assigned Roles?	None	Submitter, viewer	System Security Administrator, Data Administrator, Assigner, Reviewer, Viewer
Help?	REAC Technical Assistance Center	REAC Technical Assistance Center	HITS National Help Desk
Documentation?	“Instructions for Use of the CNA Assessment Tool”, download from CNA e Tool home page	“Instructions for Use of the CNA Assessment Tool”, download from CNA e Tool home page	“CNA e Tool Internal User Manual,” download from CNA e Tool home page

B. User Credentials & Access

Credentials, passwords and roles for the CNA e Tool will be managed in accordance with existing practices for Multifamily Automated Systems.

1. MAP lenders and servicers will access the submission portal by using FHA Connection, an existing user authentication method for FHA approved lenders. The CNA e Tool (including its submission portal) is one of several multifamily systems (aka “applications”) accessed through FHA Connection.
 - a. FHA Connection is located at <https://entp.hud.gov/clas/index.cfm>
 - b. The Multifamily ID (MID) and password are the authentication credentials for MAP lenders. Refer to FHA Connection registration procedures at

- <https://entp.hud.gov/clas/index.cfm> for information regarding the existing process for obtaining an FHA Connection MID.
- c. In order to access the CNA e-Tool, an MID user must also obtain specific authorization. An FHA Connection Application Coordinator (a lender employee) grants authorization to other lender employees to use the CNA e-Tool. Refer to the FHA Connection Guide at <https://entp.hud.gov/idapp/html/mrtg-pkg.cfm> for managing user access to FHA Connection system applications, and the functions or roles within those applications. Lender users may have either or both of two available roles for the CNA e Tool: Submitter or viewer. Viewers may see all the CNAs submitted by the lender, but may not submit a CNA.
 - d. Help desk support for MID users' application, authorization, and authentication questions is provided by the Public and Indian Housing, Real Estate Assessment Center, Technical Assistance Center (REAC-TAC). REAC-TAC can be reached by phone at 1-888-245-4860, or by the public HUD website located at http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac/support/tac
2. PAEs and PHAs will access the submission portal by using their existing MIDs through the HUD Web Access Security System (WASS). See Multifamily Coordinator and User registration at https://hudapps.hud.gov/public/wass/public/participant/partreg_page.jsp. But after registering, and obtaining an MID each user must also be authorized to access the CNA e Tool and assigned a role of either "submitter" or "viewer" by their Coordinator, an employee of their firm or agency. PAE and PHA users with questions or access or authorization problems should call the REAC-TAC at 1-888-245-4860.
 3. HUD Supervisors responsible for staff review of CNAs in connection with insured mortgages, or asset management functions or M2M restructuring or RAD transactions should request access, and an appropriate role for staff whose work assignments will include review or management of CNAs. Available roles include the following:
 - a. Assigner: a person who will assign CNAs to others for review and who will either approve or return (to the submitter for correction) a CNA based on a reviewer's recommendation. Only a person with the assigner role may approve or return a CNA;
 - b. Reviewer: a person who will review a submitted CNA and recommend approval or return (to the submitter for correction) of a CNA assigned to them. A person in a reviewer role may reassign a CNA to another person with the reviewer role. Only a person in the reviewer role may recommend approval or return of a submitted CNA.
 - c. Viewer: A person who may have read only access to submitted CNAs.

4. System access authorizations for HUD staff are requested by supervisors using the Centralized HUD Account Management Process (CHAMP). In order to access the CNA e-Tool, an HUD user must obtain authorization.
 - a. HUD federal employees must be authorized users of the Web Access Security Subsystem (WASS) before they can use the CNA e-Tool. WASS access requests can be submitted at the same time that requests for the CNA e-Tool are submitted.
 - b. CHAMP requests should be made on the “Application Access” form and should request authorization for the CNA E-TOOL-P282, and if the employee is not already authorized for WASS the request should also include WASS - P104. CHAMP is located at the internal HUD website <http://useraccess.hud.gov>. The roles requested for the user should be listed in the “Special Instruction” box at the bottom of the “Application Access” form. HUD staff with questions or access, or authorization problems should call the HITS National Help Desk.
5. Users should recall that credentials and permissions unused for 90 days are terminated as a security safeguard. When user credentials are terminated the user must contact the help desk that services their access ID in order to have access restored. Users are advised to keep their credentials current by signing on to their respective CNA e Tool web portal periodically.
6. All users should bear in mind that help desk personnel will answer access and software related questions and elementary questions concerning the nature or meaning of spreadsheet entries or values displayed in standard reports. They will not be prepared to answer substantive underwriting or policy questions about the analysis or use of CNAs. For underwriting and policy questions contact a MAP lender, PAE or HUD program representative or e-mail comments or questions to CNAeTOOL@Hud.Gov.

IV. TRAINING FOR THE CNA E TOOL, AND FUTURE REVISIONS

Training for CNA e Tool users will be provided in a variety of ways including live presentations at industry related meetings as well as several permanent resources such as the “Instructions for Use of the CNA Assessment Tool,” a guide which addresses all aspects of preparing, validating and submitting CNAs using the CNA e Tool. The Instructions may be downloaded from the CNA e Tool home page:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/cna

In addition, HUD will publish a series of training modules for the CNA e Tool, and for CNA related topics in general, concurrent with the publication of this Mortgagee Letter. These training modules are free, user activated, and available at all times to any user with requisite internet access. They may be accessed at the HUD Exchange:

<https://www.hudexchange.info/training-events/capital-needs-assessment-e-tool-training/>

HUD and USDA staff may access all of these public resources as well as the CNA e Tool Internal User Manual which may be downloaded from the CNA e Tool home page:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/cna

HUD and USDA-RD jointly developed the CNA e Tool to align agency and industry practice for preparation and submission of CNAs. HUD and USDA anticipate future enhancements and revisions to the tools and protocols as warranted by working experience with the CNA e Tool. In order to accommodate change in an orderly and aligned manner, HUD and USDA will establish a joint Change Control Board which will consider all changes proposed for the CNA e Tool. Among other things the Change Control Board will monitor help desk requests for assistance with a view to identifying and remedying common problems. Users may also offer comments, suggested best practices, and raise questions of either a technical or policy nature by email to CNAeTOOL@Hud.Gov

V. PAPERWORK REDUCTION ACT

The information collection requirements contained in this document and the CNA e Tool have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2502-0505. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

If there are any questions, and/or concerns regarding this Mortgage Letter please contact David Wilderman at (202) 402-2803, in HUD Headquarters, Office of Multifamily Production. For technical questions concerning the system tools or system access problems call your designated help desk or contact Sean Cortopassi at 202 402 4087. Persons with hearing or speech impairments may access these numbers via TDD/TTY by calling 1-877-TDD-2HUD (1-877-833-2483).

Edward L. Golding
Principal Deputy Assistant Secretary for Housing

Attachment A

The following attachment (A) is known as the Standard Table of Estimated Useful Life (aka EUL Table) and is provided here for information purposes. The names of Need Categories, Need Items and Component Types are standardized and a fixed number of years is established as the Estimated Useful Life for each Component Type. The EUL Table is embedded in the CNA e Tool and functions as a “pick list” or list of values supporting the description of components found by needs assessors at properties. A component ID is a free form description of a particular Component Type observed by the needs assessor at a property. The EUL Table sets the standard nomenclature and categorization of components and establishes a default value for estimated useful life measured in years. Assessors may alter the default value by entering an “assessed RUL” or assessed remaining useful life, reflecting actual observed conditions provided that the assessor explains any departure from the standard calculation of RUL based the standard EUL less the age of the component.

It is intended that the Change Control Board will update the EUL Table periodically to add new products as Component Types and to amend established EULs based on new evidence or past experience.

CNA e-Tool Estimated Useful Life Table

This table lists the recommended average useful life of the categories of assets that should be considered in a Capital Needs Assessment. If an observed item is not listed, it should be assigned to the most closely related category. The Standard EUL for a component type is fixed. The user may estimate the Remaining Useful Life of any existing component independent of the Standard EUL by entering the assessed RUL in the appropriate space on the Components tab of the Excel Assessment Tool and by justifying the assessed RUL in the adjacent comment box. When identifying an alternative to an existing component the user may specify an EUL for the alternative which differs from the Standard EUL for that component type but must enter an explanation in the Notes space on the Alternatives tab of the Tool. Each specific component assessed is given a free-form description by the needs assessor and this description is the "component ID" or component name which may be more specific than the "Component Type", e.g (a particular kind, size, etc of refrigerator, not just any refrigerator.)

Numbering by ASTM 2018-08 Outline									
	ASTM Outline	HUD Extension of ASTM Outline			Component Description	Family	Elderly	3 tiers of categorization: Need Category, Need Item, Component Type	
3					System Description and Observations				
	3.1				Overall General Description				
	3.2				Site Systems				Need Category
		3.2.1			Topography			All items not color coded are "Component Type" names.	
		3.2.2			Storm Water Drainage				Need Item
			3.2.2.1		Catch basins, inlets, culverts	50	50		
			3.2.2.2		Marine or stormwater bulkhead	35	35		
			3.2.2.3		Earthwork, swales, drainways, erosion controls	50	50		
			3.2.2.4		Storm drain lines	50	50		
			3.2.2.5		Stormwater mgmt ponds	50	50		
			3.2.2.6		Fountains, pond aerators	15	15	Need Item	
		3.2.3			Access and Egress				
			3.2.3.1		Security gate - lift arm	10	10		
			3.2.3.2		Security gate - rolling gate	15	15	Need Item	
		3.2.4			Paving, Curbing and Parking				
			3.2.4.1		Asphalt Pavement	25	25		
			3.2.4.2		Asphalt Seal Coat	5	5		

		3.2.4.3	Concrete Pavement	50	50	
		3.2.4.4	Curbing, Asphalt	25	25	
		3.2.4.5	Curbing, Concrete	50	50	
		3.2.4.6	Parking, Gravel Surfaced	15	15	
		3.2.4.7	Permeable Paving Systems (brick, concrete pavers)	30	30	
		3.2.4.8	Striping and Marking	15	15	
		3.2.4.9	Signage, Roadway / Parking	15	15	
		3.2.4.10	Carports, wood frame	30	30	
		3.2.4.11	Carports, metal frame	40	40	
	3.2.5		Flatwork (walks, plazas, terraces, patios)			Need Item
		3.2.5.1	Asphalt	25	25	
		3.2.5.2	Concrete	50	50	
		3.2.5.3	Gravel	15	15	
		3.2.5.4	Permeable Paving (brick, concrete pavers)	30	30	
	3.2.6		Landscaping and Appurtenances			Need Item
		3.2.6.1	Fencing, chain-link	40	40	
		3.2.6.2	Fencing, wood picket	15	20	
		3.2.6.3	Fencing, wood board (=>1"x 6")	20	25	
		3.2.6.4	Fencing, wrought Iron	60	60	
		3.2.6.5	Fencing, steel or aluminum	20	25	
		3.2.6.6	Fencing, concrete Masonry unit (CMU)	30	30	
		3.2.6.7	Fencing, PVC	15	20	
		3.2.6.8	Signage, Entrance/Monument	25	25	
		3.2.6.9	Mail Kiosk	15	20	
		3.2.6.10	Retaining Walls, heavy block (50-80 lb)	60	60	
		3.2.6.11	Retaining Walls, reinforced concrete masonry unit (CMU)	40	40	
		3.2.6.12	Retaining Walls, treated timber	25	25	
		3.2.6.13	Storage sheds	30	30	
	3.2.7		Recreational Facilities			Need Item
		3.2.7.1	Sport Court- asphalt	25	25	
		3.2.7.2	Sport Court- synthetic	15	20	
		3.2.7.3	Sport Court-hardwood	50	50	
		3.2.7.4	Tot Lot (playground equipment)	10	15	

			3.2.7.5		Tot Lot- lose ground cover	3	5	
			3.2.7.6		Pool Deck	15	15	
			3.2.7.7		Pool/Spa Plastic Liner	8	8	
			3.2.7.8		Pool/Spa pumps and equipment	10	10	
			3.2.7.9		Decks-treated lumber	20	20	
			3.2.7.10		Decks-composite	50	50	
		3.2.8			Site Utilities			
			3.2.8.1		Site Utilities-Water			Need Item
				3.2.8.1.1	Water Mains/Valves	50	50	
				3.2.8.1.2	Water Tower	50	50	
				3.2.8.1.3	Irrigation System	25	25	
			3.2.8.2		Site Utilities-Electric			Need Item
				3.2.8.2.1	Electric distribution center	40	40	
				3.2.8.2.2	Electric distribution lines	40	40	
				3.2.8.2.3	Transformer	30	30	
				3.2.8.2.4	Emergency Generator	25	25	
				3.2.8.2.5	Solar Photovoltaic panels	15	15	
				3.2.8.2.6	Photovoltaic Inverters	10	10	
				3.2.8.2.7	Pole mounted lights	25	25	
				3.2.8.2.8	Ground lighting	10	10	
				3.2.8.2.9	Building Mounted Lighting	10	10	
				3.2.8.2.10	Building Mounted High Intensity Discharge (HID) Lighting	10	20	
			3.2.8.3		Site Utilities-Gas			Need Item
				3.2.8.3.1	Gas Main	40	40	
				3.2.8.3.2	Gas Supply Lines	40	40	
				3.2.8.3.3	Site Propane, Storage & Distribution	35	35	
				3.2.8.3.4	Gas lights/fire pits	20	20	
			3.2.8.4		Site Utilities-Sewer			Need Item
				3.2.8.4.1	Sanitary Sewer lines	50	50	
				3.2.8.4.2	Sanitary waste treatment system	40	40	
				3.2.8.4.3	Lift Station	50	50	
			3.2.8.5		Site Utilities-Trash			Need Item
				3.2.8.5.1	Dumpsters	15	15	

			3.2.8.5.2	Compactors (exterior, commercial grade)	20	20	
			3.2.8.5.3	Recycling containers/equipment	15	15	
			3.2.8.5.4	Composting, organic recycling equipment	10	10	
	3.3			Building Frame & Envelope			Need Category
		3.3.1		Foundation			Need Item
			3.3.1.1	Slab, reinforced concrete	100	100	
			3.3.1.2	Slab, post tensioned	100	100	
			3.3.1.3	Continuous reinforced concrete footer and CMU stem wall	100	100	
			3.3.1.4	Piers, reinforced concrete footer and CMU pier	100	100	
			3.3.1.5	Piers, treated timber post/pole	40	40	
			3.3.1.6	Foundation Waterproofing	40	40	
			3.3.1.7	Foundation suction, drainage, groundwater, radon gas controls, pumps, sumps, equip. failure alarms	10	10	
		3.3.2		Building Frame			
			3.3.2.1	Framing System, Floors & Walls			Need Item
			3.3.2.1.1	Wood, timbers, dimensioned lumber, laminated beams, trusses	100	100	
			3.3.2.1.2	Tie downs, clips, braces, straps, hangers, shear walls/panels	75	75	
			3.3.2.1.3	Steel, beams, trusses	100	100	
			3.3.2.1.4	Reinforced concrete	100	100	
			3.3.2.1.5	Reinforced masonry, concrete masonry units (CMUs)	100	100	
			3.3.2.1.6	Solid Masonry (obsolete)	100	100	
			3.3.2.2	Crawl Spaces, Envelope Penetrations			Need Item
			3.3.2.2.1	Sealed crawl space system	40	40	
			3.3.2.2.2	Vents, screens, covers	30	30	
			3.3.2.2.3	Vapor Barrier (VDR) ground or underfloor	30	30	
			3.3.2.2.4	Penetrations, caulking/sealing	15	15	
			3.3.2.2.5	Crawl space, (de)pressurization, fans, pumps, sumps, equipment failure alarms	10	10	
			3.3.2.3	Roof Frame & Sheathing			Need Item
			3.3.2.3.1	Wood frame and board or plywood sheathing	75	75	
			3.3.2.3.2	Tie downs, clips, braces, straps, hangers	75	75	
			3.3.2.3.3	Steel frame and sheet metal or insulated panel sheathing	100	100	
			3.3.2.3.4	Reinforced concrete deck	100	100	
			3.3.2.4	Flashing & Moisture Protection			Need Item

			3.3.2.4.1	Caulking and Sealing	15	15	
			3.3.2.4.2	Concrete/Masonry Sealants	10	10	
			3.3.2.4.3	Wood waterproofing and sealants	10	10	
			3.3.2.4.4	Building wraps & moisture resistant barriers	50	50	
			3.3.2.4.5	Paints and stains, exterior	8	8	
		3.3.2.5		Attics & Eaves			Need Item
			3.3.2.5.1	Screened gable end or soffit Vents	30	30	
			3.3.2.5.2	Roof vents, passive	40	40	
			3.3.2.5.3	Roof Vents, powered	20	20	
		3.3.2.6		Insulation			Need Item
			3.3.2.6.1	Loose fill, fiber glass, cellulose, mineral wool	50	50	
			3.3.2.6.2	Batts, blankets, rolls, fiber glass or mineral wool	60	60	
			3.3.2.6.3	Rigid foam board	60	60	
			3.3.2.6.4	Sprayed foam	60	60	
		3.3.2.7		Exterior Stairs, Rails, Balconies/Porches, Canopies			Need Item
			3.3.2.7.1	Exterior Stairs, wood frame/stringer	30	30	
			3.3.2.7.2	Exterior Stair Tread-wood	15	15	
			3.3.2.7.3	Exterior Stairs-steel frame/stringer	40	40	
			3.3.2.7.4	Exterior Stair Tread-metal, concrete filled	20	20	
			3.3.2.7.5	Exterior Stairs, Concrete	50	50	
			3.3.2.7.6	Fire escapes, metal	50	50	
			3.3.2.7.7	Balcony/Porch, wood frame	25	25	
			3.3.2.7.8	Balcony/Porch, steel frame or concrete	40	40	
			3.3.2.7.9	Balcony/Porch, wood decking	20	20	
			3.3.2.7.10	Balcony/Porch, composite decking	50	50	
			3.3.2.7.11	Railings, wood	20	20	
			3.3.2.7.12	Railings, metal	50	50	
			3.3.2.7.13	Railings, composite	50	50	
			3.3.2.7.14	Canopy, Concrete	50	50	
			3.3.2.7.15	Canopy, Wood/Metal	40	40	
		3.3.2.8		Exterior Doors & Entry Systems			Need Item
			3.3.2.8.1	Unit Entry Door, Exterior, solid wood/metal clad	25	30	
			3.3.2.8.2	Common Exterior Door, aluminum and glass	30	30	

			3.3.2.8.3	Common Exterior Door, solid wood /metal clad	25	25	
			3.3.2.8.4	Storm/Screen Doors	5	10	
			3.3.2.8.5	Sliding Glass Doors	25	30	
			3.3.2.8.6	French or Atrium Doors, wood/metal clad	25	30	
			3.3.2.8.7	Automatic Entry Doors	30	30	
			3.3.2.8.8	Commercial Entry Systems	50	50	
			3.3.2.8.9	Overhead Door	30	30	
			3.3.2.8.10	Automatic Opener, overhead door	20	20	
		3.3.3		Façades or Curtainwall			
			3.3.3.1	Sidewall System			Need Item
			3.3.3.1.1	Aluminum Siding	40	40	
			3.3.3.1.2	Vinyl Siding	25	25	
			3.3.3.1.3	Cement Board Siding	45	45	
			3.3.3.1.4	Plywood/Laminated Panels	20	20	
			3.3.3.1.5	Exterior Insulation Finishing System (EIFS)	30	30	
			3.3.3.1.6	Stucco, over wire mesh/lath	50	50	
			3.3.3.1.7	Metal/Glass Curtain Wall	40	40	
			3.3.3.1.8	Precast Concrete Panel (tilt-up)	60	60	
			3.3.3.1.9	Brick/block veneer	60	60	
			3.3.3.1.10	Stone Veneer	50	50	
			3.3.3.1.11	Glass Block	50	50	
			3.3.3.1.12	Cedar/Redwood shakes, clapboard	50	50	
			3.3.3.1.13	Pine board, clapboard	50	50	
			3.3.3.2	Windows			Need Item
			3.3.3.2.1	Wood, (dbl, sgl hung, casement, awning, sliders)	35	45	
			3.3.3.2.2	Wood, fixed pane, picture	40	45	
			3.3.3.2.3	Aluminum	35	40	
			3.3.3.2.4	Vinyl	30	30	
			3.3.3.2.5	Vinyl/Alum Clad Wood	50	50	
			3.3.3.2.6	Storm/Screen Windows	7	15	
		3.3.4		Roofing and Roof Drainage			
			3.3.4.1	Sloped Roofs			Need Item
			3.3.4.1.1	Asphalt Shingle	20	20	

			3.3.4.1.2	Metal	50	50	
			3.3.4.1.3	Slate shingle	75	75	
			3.3.4.1.4	Clay/cementitious barrel tile	60	60	
			3.3.4.1.5	Wood Shingle, Cedar Shakes/Shingles	25	25	
		3.3.4.2		Low Slope/Flat Roofs			Need Item
			3.3.4.2.1	Low slope-Built-up Roof, with gravel finish	20	20	
			3.3.4.2.2	Low slope-Built-up Roof, no mineral or gravel finish	10	10	
			3.3.4.2.3	Low slope-Adhered rubber membrane, (EPDM)	15	15	
			3.3.4.2.4	Low slope-Thermoplastic membrane, (TPO, vinyl)	15	15	
			3.3.4.2.5	Low slope-Rubberized/elastomeric white/cool roof	15	15	
		3.3.4.3		Roof Drainage, Trim & Accessories			Need Item
			3.3.4.3.1	Gutters/Downspouts, aluminum	20	20	
			3.3.4.3.2	Gutters/Downspouts, copper	50	50	
			3.3.4.3.3	Low slope-roof drains, scuppers	30	30	
			3.3.4.3.4	Soffits, Wood, Vinyl, Metal	20	20	
			3.3.4.3.5	Fascia, Wood, Vinyl	20	20	
			3.3.4.3.6	Roof Hatch	30	30	
			3.3.4.3.7	Service Door	30	30	
			3.3.4.3.8	Roof Skylight	30	30	
3.4				Mech.-Elect.-Plumbing			Need Category
	3.4.1			Plumbing			
		3.4.1.1		Water Supply and Waste Piping			Need Item
			3.4.1.1.1	PVC/CPVC pipe, supply and waste	75	75	
			3.4.1.1.2	Copper/brass hard pipe, supply	75	75	
			3.4.1.1.3	Copper Tube, supply	50	50	
			3.4.1.1.4	Galvanized pipe, supply	40	40	
			3.4.1.1.5	Cast iron sanitary waste	75	75	
			3.4.1.1.6	Domestic Cold Water Pumps	20	20	
			3.4.1.1.7	Sewage Ejectors	50	50	
			3.4.1.1.8	Commercial Sump Pump	20	20	
			3.4.1.1.9	Residential Sump Pump	15	15	
			3.4.1.1.10	Water Softener/Filtration	15	15	
		3.4.1.2		Domestic Water Heating			Need Item

			3.4.1.2.1	DHW circulating pumps	15	15	
			3.4.1.2.2	DHW storage tanks	15	15	
			3.4.1.2.3	Exchanger, in tank or boiler	15	15	
			3.4.1.2.4	External tankless heater, gas or electric	20	20	
			3.4.1.2.5	Solar hot water	20	20	
			3.4.1.2.6	Residential hot water heater, gas or electric	12	15	
			3.4.1.2.7	Flue, gas water heaters	35	35	
			3.4.1.2.8	Boilers, Oil Fired, Sectional	25	25	
			3.4.1.2.9	Boilers, Gas Fired, Sectional	25	25	
			3.4.1.2.10	Boilers, Oil/ Gas/ Dual Fuel, Low MBH	30	30	
			3.4.1.2.11	Boilers, Oil/ Gas/ Dual Fuel, High MBH	40	40	
			3.4.1.2.12	Boilers, Gas Fired Atmospheric	25	25	
			3.4.1.2.13	Boilers, Electric	20	20	
			3.4.1.2.14	Boiler Blowdown and Water Treatment	25	25	
			3.4.1.2.15	Boiler Room Pipe Insulation	25	25	
			3.4.1.2.16	Boiler Room Piping	50	50	
			3.4.1.2.17	Boiler Room Valves	25	25	
			3.4.1.2.18	Boiler Temperature Controls	15	15	
			3.4.1.2.19	Heat Exchanger	35	35	
		3.4.1.3		Fixtures			Need Item
			3.4.1.3.1	Faucets & valves	15	20	
			3.4.1.3.2	Bath tubs & sinks, cast iron	75	75	
			3.4.1.3.3	Bubs tubs & sinks, enameled or stainless steel, fiberglass	40	40	
			3.4.1.3.4	Bath tubs & sinks, porcelain	50	50	
			3.4.1.3.5	Toilets/bidets/urinals	40	40	
			3.4.1.3.6	Flush valves	10	15	
			3.4.1.3.7	Tub/shower units or integrated assemblies	30	30	
		3.4.2		Centralized HVAC Systems			
		3.4.2.1		Centralized Heating/Cooling Equipment			Need Item
			3.4.2.1.1	Boilers, Oil Fired, Sectional - Centralized	25	25	
			3.4.2.1.2	Boilers, Gas Fired, Sectional - Centralized	25	25	
			3.4.2.1.3	Boilers, Oil/ Gas/ Dual Fuel, Low MBH - Centralized	30	30	
			3.4.2.1.4	Boilers, Oil/ Gas/ Dual Fuel, High MBH - Centralized	40	40	

			3.4.2.1.5	Boilers, Gas Fired Atmospheric - Centralized	25	25	
			3.4.2.1.6	Boilers, Electric - Centralized	20	20	
			3.4.2.1.7	Boiler Blowdown and Water Treatment - Centralized	25	25	
			3.4.2.1.8	Boiler Room Pipe Insulation - Centralized	25	25	
			3.4.2.1.9	Boiler Room Piping - Centralized	50	50	
			3.4.2.1.10	Boiler Room Valves - Centralized	25	25	
			3.4.2.1.11	Boiler Temperature Controls - Centralized	15	15	
			3.4.2.1.12	Heat Exchanger - Centralized	35	35	
			3.4.2.1.13	Combustion Air, Duct with Fixed Louvers	30	30	
			3.4.2.1.14	Combustion Air, Motor Louvers and Duct	25	25	
			3.4.2.1.15	Combustion Waste Flue	40	40	
			3.4.2.1.16	Cooling tower	25	25	
			3.4.2.1.17	Chilling plant	20	20	
			3.4.2.1.18	Steam supply station	50	50	
			3.4.2.1.19	Free standing chimney	50	50	
		3.4.2.2		Centralized Heat/Air/Fuel Distribution			Need Item
			3.4.2.2.1	Fuel oil/propane storage tanks	40	40	
			3.4.2.2.2	Remediate/remove abandoned tanks/fuel lines	100	100	
			3.4.2.2.3	Fuel transfer system	25	25	
			3.4.2.2.4	Gas/oil distribution lines	50	50	
			3.4.2.2.5	Gas meter	40	40	
			3.4.2.2.6	2 pipe/4 pipe hydronic distribution-above grade	50	50	
			3.4.2.2.7	2 pipe/4 pipe hydronic distribution-in ground	25	25	
			3.4.2.2.8	Hydronic/Water Circulating Pumps	20	20	
			3.4.2.2.9	Hydronic/Water Controller	20	20	
			3.4.2.2.10	Radiation-steam/hydronic (baseboard or freestanding radiator)	50	50	
			3.4.2.2.11	Fan Coil Unit, Hydronic	30	30	
			3.4.2.2.12	Central exhaust fans/blowers	20	20	
		3.4.3		Decentralized and Split HVAC Systems			
		3.4.3.1		Dwelling/Common Area HVAC Equipment			Need Item
			3.4.3.1.1	Electric heat pump, condenser, pad or rooftop	15	15	
			3.4.3.1.2	Electric AC condenser, pad or rooftop	15	15	
			3.4.3.1.3	Electric furnace/air handler	20	20	

			3.4.3.1.4	Gas furnace/air handler	20	20	
			3.4.3.1.5	Hydronic heat/electric AC air handler	25	25	
			3.4.3.1.6	Hydronic feed electric heat pump/air handler	25	25	
			3.4.3.1.7	Wall mounted electric/gas heater	25	25	
			3.4.3.1.8	Electric baseboard heater	30	30	
			3.4.3.1.9	PTAC Thruwall (packaged terminal air conditioning)	15	15	
			3.4.3.1.10	Window or thru-wall air conditioners	10	10	
			3.4.3.1.11	Package HVAC roof top	15	15	
			3.4.3.1.12	Air filtration/humidity control devices (humidifiers, HRV's)	20	20	
			3.4.3.1.13	Duct, rigid sheet metal, insulated if not in conditioned space	35	35	
			3.4.3.1.14	Duct, flexible, insulated	20	20	
			3.4.3.1.15	Duct, sealing-mastic or UL 181A or 181B tape.	20	20	
			3.4.3.1.16	Diffusers, registers	20	20	
			3.4.3.1.17	Fireplace, masonry & firebrick, masonry chimney	75	75	
			3.4.3.1.18	Fireplace, factory assembled	35	35	
			3.4.3.1.19	Fireplace insert, stove	50	50	
			3.4.3.1.20	Chimneys, metal, and chimney covers	35	35	
		3.4.3.2		HVAC Controls			Need Item
			3.4.3.2.1	Dwelling/common area thermostat	15	20	
			3.4.3.2.2	Heat sensors	15	15	
			3.4.3.2.3	Outdoor temperature sensor	10	10	
		3.4.4		Electrical			
		3.4.4.1		Electric Service & Metering			Need Item
			3.4.4.1.1	Building service panel	50	50	
			3.4.4.1.2	Building meter	40	40	
			3.4.4.1.3	Tenant meters, meter panel	40	40	
		3.4.4.2		Electrical Distribution			Need Item
			3.4.4.2.1	Tenant electrical panel	50	50	
			3.4.4.2.2	Unit/building wiring	50	50	
		3.4.4.3		Electric Lighting & Fixtures			Need Item
			3.4.4.3.1	Switches & outlets	35	35	
			3.4.4.3.2	Lighting - exterior entry	15	20	
			3.4.4.3.3	Lighting- interior common space	25	30	

			3.4.4.3.4	Lighting - Tenant Spaces	20	25	
			3.4.4.3.5	Door bells, chimes	20	25	
		3.4.4.4		Telecommunications Equipment			Need Item
			3.4.4.4.1	Satellite dishes/antennae	20	20	
			3.4.4.4.2	Telecom panels & controls	20	20	
			3.4.4.4.3	Telecom cabling & outlets	20	20	
	3.5			Vertical Transportation			Need Category
		3.5.1		Elevators/Escalators			Need Item
			3.5.1.1	Electrical switchgear	50	50	
			3.5.1.2	Electrical wiring	30	30	
			3.5.1.3	Elevator controller, call, dispatch, emergency	10	20	
			3.5.1.4	Elevator cab, interior finish	10	20	
			3.5.1.5	Elevator cab, frame	35	50	
			3.5.1.6	Elevator, machinery	20	30	
			3.5.1.7	Elevator, shaftway doors	10	20	
			3.5.1.8	Elevator, shaftway hoist rails, cables, traveling	20	25	
			3.5.1.9	Elevator, shaftway hydraulic piston and leveling	20	25	
			3.5.1.10	Escalators	50	50	
	3.6			Life Safety/Fire Protection			Need Category
		3.6.1		Sprinklers and Standpipes			Need Item
			3.6.1.1	Building fire suppression sprinklers, standpipes	50	50	
			3.6.1.2	Fire pumps	20	20	
			3.6.1.3	Fire hose stations	50	50	
			3.6.1.4	Fire extinguishers	10	15	
		3.6.2		Alarm, Security & Emergency Systems			Need Item
			3.6.2.1	Tenant space alarm systems	10	15	
			3.6.2.2	Residential smoke detectors	5	7	
			3.6.2.3	Call station	10	15	
			3.6.2.4	Emergency/auxiliary generator	25	25	
			3.6.2.5	Emergency/auxiliary fuel storage tank	25	25	
			3.6.2.6	Emergency lights, illuminated signs	5	10	
			3.6.2.7	Smoke and fire detection system, central panel	15	15	
			3.6.2.8	Buzzer/intercom, central panel	20	20	

		3.6.2.9		Tenant buzzer / intercom /secured entry system	20	20	
		3.6.3		Other Systems			Need Item
		3.6.3.1		Pneumatic Lines and Controls	30	30	
		3.6.3.2		Auto-securing doors/entries/lock down	30	30	
	3.7			Interior Elements			
		3.7.1		Interiors-Common Areas			Need Category
		3.7.1.1		Finished walls, ceilings, floors			Need Item
			3.7.1.1.1	Drywall - Common	35	40	
			3.7.1.1.2	Plaster - Common	50	50	
			3.7.1.1.3	Paints, stains, clear finishes, interior - Common	15	20	
			3.7.1.1.4	Wallpapers - Common	15	20	
			3.7.1.1.5	Wall tile, ceramic, glass, natural stone - Common	35	50	
			3.7.1.1.6	Floor tile, ceramic, natural stone - Common	40	50	
			3.7.1.1.7	Concrete/Masonry/Terrazzo - Common	75	75	
			3.7.1.1.8	Hardwood floor (3/4" strip or parquet) - Common	50	50	
			3.7.1.1.9	Wood floor, laminated/veneered - Common	20	25	
			3.7.1.1.10	Resilient tile or sheet floor (vinyl, linoleum) - Common	15	20	
			3.7.1.1.11	Carpet - Common	6	10	
			3.7.1.1.12	Acoustic tile/drop ceiling - Common	15	20	
		3.7.1.2		Millwork (doors, trim, cabinets, tops)			Need Item
			3.7.1.2.1	Interior, hollow core doors - Common	20	25	
			3.7.1.2.2	Interior doors, solid core, wood, metal clad, fire rated	30	35	
			3.7.1.2.3	Door trim - Common	20	30	
			3.7.1.2.4	Wall trim (base, chair rail, crown moldings) - Common	30	35	
			3.7.1.2.5	Passage & lock sets - Common	15	20	
			3.7.1.2.6	Bifold & sliding doors - Common	15	20	
			3.7.1.2.7	Cabinets & vanities - Common	20	25	
			3.7.1.2.8	Tops, granite, natural stone, engineered stone - Common	50	50	
			3.7.1.2.9	Tops, solid surface, stainless steel - Common	40	50	
			3.7.1.2.10	Tops, plastic laminates, wood - Common	15	25	
			3.7.1.2.11	Vanity tops, cultured marble, molded acrylic, fiber glass - Common	25	35	
		3.7.1.3		Appliances			Need Item
			3.7.1.3.1	Refrigerator/freezer - Common	15	15	

			3.7.1.3.2	Range, cook top, wall oven - Common	20	25	
			3.7.1.3.3	Range hood - Common	20	25	
			3.7.1.3.4	Microwave - Common	10	10	
			3.7.1.3.5	Disposal (food waste) - Common	7	10	
			3.7.1.3.6	Compactors (interior, residential grade) - Common	7	10	
			3.7.1.3.7	Dishwasher - Common	10	15	
			3.7.1.3.8	Clothes washer/dryer - Common	10	15	
		3.7.1.4		Specialties			Need Item
			3.7.1.4.1	Interior Mail Facility	20	25	
			3.7.1.4.2	Common area bath accessories (towel bars, grab bars, toilet stalls, etc.)	7	12	
			3.7.1.4.3	Mirrors & medicine cabinets - Common	20	25	
			3.7.1.4.4	Closet/storage specialties, shelving - Common	20	25	
			3.7.1.4.5	Common area interior stairs	50	50	
			3.7.1.4.6	Common area railings	15	25	
			3.7.1.4.7	Bath/kitchen vent/exhaust fans - Common	15	15	
			3.7.1.4.8	Ceiling fans - Common	15	15	
			3.7.1.4.9	Window treatments, drapery rods, shades, blinds, etc. - Common	15	25	
			3.7.1.4.10	Indoor recreation and fitness equipment	10	15	
			3.7.1.4.11	Entertainment centers, theatre projection and seating	15	25	
	3.7.2			Interiors-Dwelling Units			Need Category
		3.7.2.1		Finished walls, ceilings, floors			Need Item
			3.7.2.1.1	Drywall	35	40	
			3.7.2.1.2	Plaster	50	50	
			3.7.2.1.3	Paints, stains, clear finishes, interior	10	15	
			3.7.2.1.4	Wallpapers	10	15	
			3.7.2.1.5	Wall tile, ceramic, glass, natural stone	30	40	
			3.7.2.1.6	Floor tile, ceramic, natural stone	40	50	
			3.7.2.1.7	Concrete/Masonry/Terrazzo	75	75	
			3.7.2.1.8	Hardwood floor (3/4" strip or parquet)	50	50	
			3.7.2.1.9	Wood floor, laminated/veneered	15	20	
			3.7.2.1.10	Resilient tile or sheet floor (vinyl, linoleum)	15	20	
			3.7.2.1.11	Carpet	6	10	

			3.7.2.1.12	Acoustic tile/drop ceiling	15	20	
		3.7.2.2		Millwork (doors, trim, cabinets, tops)			Need Item
			3.7.2.2.1	Interior, hollow core doors	20	25	
			3.7.2.2.2	Interior doors, solid core, wood, metal clad	30	35	
			3.7.2.2.3	Door trim	20	30	
			3.7.2.2.4	Wall trim (base, chair rail, crown moldings)	25	35	
			3.7.2.2.5	Passage & lock sets	12	20	
			3.7.2.2.6	Bifold & sliding doors	12	20	
			3.7.2.2.7	Cabinets & vanities	20	25	
			3.7.2.2.8	Tops, granite, natural stone, engineered stone	50	50	
			3.7.2.2.9	Tops, solid surface, stainless steel	40	50	
			3.7.2.2.10	Tops, plastic laminates, wood	15	25	
			3.7.2.2.11	Vanity tops, cultured marble, molded acrylic, fiber glass	25	35	
		3.7.2.3		Appliances			Need Item
			3.7.2.3.1	Refrigerator/freezer	12	15	
			3.7.2.3.2	Range, cook top, wall oven	15	25	
			3.7.2.3.3	Range hood	15	25	
			3.7.2.3.4	Microwave	10	10	
			3.7.2.3.5	Disposal (food waste)	7	10	
			3.7.2.3.6	Compactors (interior, residential grade)	7	10	
			3.7.2.3.7	Dishwasher	10	15	
			3.7.2.3.8	Clothes washer/dryer	10	15	
		3.7.2.4		Specialties			Need Item
			3.7.2.4.1	Bath accessories (towel bars, grab bars, etc.)	7	12	
			3.7.2.4.2	Mirrors & medicine cabinets	15	25	
			3.7.2.4.3	Closet/storage specialties, shelving	15	25	
			3.7.2.4.4	Interior stairs	50	50	
			3.7.2.4.5	Stair and loft railings	20	25	
			3.7.2.4.6	Bath/kitchen vent/exhaust fans	15	15	
			3.7.2.4.7	Ceiling fans	10	15	
			3.7.2.4.8	Window treatments, drapery rods, shades, blinds, etc.	10	20	
4				Additional Considerations			Need Category
	4.1			Environmental Items (not elsewhere defined)			Need Item

		4.1.1		Environmental remediation alarms	5	5	
		4.1.2		Environmental remediation pumps & equipment	5	5	
		4.1.3		Mold-treat-remediate	100	100	
		4.1.4		Pest Control/Integrated Pest Management Plan	1	1	
	4.2			Lead based paint (LBP), asbestos			Need Item
		4.2.1		LBP inspection	100	100	
		4.2.2		Lead based paint abatement			
			4.2.2.1	LBP encapsulation (abatement)	20	20	
			4.2.2.2	LBP removal	100	100	
		4.2.3		Lead based paint interim controls			
			4.2.3.1	LBP hazard interim control	6	6	
			4.2.3.2	LBP Encapsulation (interim control)	6	6	
		4.2.4		Asbestos			
			4.2.4.1	Asbestos encapsulation (abatement)	10	10	
			4.2.4.2	Asbestos Removal	100	100	
	4.3			Commercial Tenant Improvements			Need Item
		4.3.1		Owner provided item(s) (specify)	5	5	
		4.3.2		Owner provided \$ allowance (specify)	5	5	