

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT



# Corrective Action Plans (Accessibility Remedies) in the CNA e Tool

**SWAC Conference  
Ft Worth TX  
May 10, 2018**

**Office of Multifamily  
Housing Programs**

# The CNA e-Tool

...an important step in Multifamily toward a more efficient and consistent underwriting approach ...




# Corrective Action Plans

- A “detachable” summary of accessibility deficiencies and remedies intended to facilitate communication with and review
  - By HUD field staff;
  - Or by HQ staff when/if remedies cannot be completed within 12 months
- Required by ML 2012-25, later incorporated in 2016 MAP Guide Appendix 5B section II

# Where is the Corrective Action Plan?

Capital Needs Assessment Tool Contact Us | Help | Logout

U.S. Department of Housing and Urban Development  
U.S. Department of Agriculture - Rural Development  USDA  
Logged in as: H46459

CNA SUBMISSION **LOCATE CNA**  Reports Expand All Collapse All Back

Reviewer <input type="text"/>	Rems Property ID <input type="text"/>	Postal Code <input type="text"/>
Assessment ID <input type="text"/>	Property Name <input type="text"/>	Case Number <input type="text"/>
Date CNA Submitted 4/19/2018	State <input type="text"/>	Internal Status Under Review
Review Completed Date <input type="text"/>	City <input type="text"/>	

[View Previous History](#)

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

[Back](#)



# Second Table in Critical Repairs

> Estimate Period Recap

▼ Critical Repair Needs

**Life Safety Critical Repairs**

View ▾ Export Detach

Need Category	Need Item	Component Type	Component	Alternative Name	Repair or Replacement Location	Scope of Required Replacement or Refurbishment	Action	Quantity
Additional Considerations	Environmental Items	Environmental re...	68-Elevation Certif...	Elevation Certificat...	Site	Elevation Certificate	One-time Repair	1
Additional Considerations	Environmental Items	Environmental re...	67-Tank Integrity ...	Tank Integrity Tes...	Site	Tank Testing	One-time Repair	1
Building Frame & ...	Foundation	Slab, reinforced co...	49-Address Buildin...	Address Building C...	Refer to the buildi...	Address the buildi...	One-time Repair	3
Building Frame & ...	Foundation	Slab, reinforced co...	50-Address Buildin...	Address Building C...	Refer to the buildi...	Address the buildi...	One-time Repair	2
Mech.-Elect.-Plum...	Electrical Distributi...	Unit/building wiring	78-GFCI Outlets (...)	GFCI Outlets (Criti...	Dwelling Units	Install GFCI	One-time Repair	5
Life Safety/Fire Pr...	Alarm, Security & ...	Residential smoke ...	76-HUD Compliant...	HUD Compliant S...	Dwelling Units	Install tamper-pro...	One-time Repair	248
Life Safety/Fire Pr...	Alarm, Security & ...	Residential smoke ...	77-Missing Smoke...	Missing Smoke De...	Dwelling Units	Install tamper-pro...	One-time Repair	1
Interiors-Dwelling ...	Finished walls, ceil...	Floor tile, ceramic...	81-Mildew in Bath...	Mildew in Bathroom	Dwelling Units	Mildew in Bathroom	One-time Repair	1

< >

**Accessibility Critical Repairs**

View ▾ Export Detach

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

< >

> Non Critical Repair Needs

> Future Repair Replacements



# Click “Detach” to Expand


Accessibility Critical Repairs

View ▾ Export **Detach**

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

# Can be exported as Excel file

Detached Table

View ▾ **Export**  Detach

Need Category	Need Item	Component Type	Component	Alternative Name	Repair or Replacement Location	Scope of Required Accessibility Compliance	Action
Interiors-Dwelling Units	Specialties	Bath accessories (...)	73-Install Complia...	Install Compliant ...	Dwelling Units	Reference UFAS S...	One-time Re
Interiors-Dwelling Units	Specialties	Bath accessories (...)	74-Install Complia...	Install Compliant ...	Dwelling Units	Reference UFAS S...	One-time Re
Mech.-Elect.-Plumbing	Fixtures	Bubs tubs & sinks,...	72-Install Levered ...	Install Levered Sh...	Dwelling Units	Reference UFAS S...	One-time Re
Life Safety/Fire Protection	Alarm, Security & ...	Tenant space alar...	75-2% Audio Visu...	2% Audio Visual A...	Dwelling Units	Existing buildings t...	One-time Re
Interiors-Common Areas	Millwork (doors, tr...	Passage & lock set...	63-Install Accessib...	Install Accessible ...	Common Area	Reference UFAS S...	One-time Re
Interiors-Dwelling Units	Millwork (doors, tr...	Passage & lock sets	70-Install Accessib...	Install Accessible ...	Dwelling Units	Reference UFAS S...	One-time Re
Interiors-Dwelling Units	Millwork (doors, tr...	Cabinets & vanities	66-Install Roll-Und...	Install Roll-Under ...	Common Area	Reference UFAS S...	One-time Re
Interiors-Dwelling Units	Millwork (doors, tr...	Cabinets & vanities	67-Install Complia...	Install Compliant ...	Common Area	Reference UFAS S...	One-time Re
Interiors-Dwelling Units	Millwork (doors, tr...	Cabinets & vanities	69-Install Complia...	Install Compliant ...	Dwelling Units	Reference UFAS S...	One-time Re
Interiors-Dwelling Units	Millwork (doors, tr...	Cabinets & vanities	68-Install Complia...	Install Compliant ...	Common Area	Reference UFAS S...	One-time Re
Interiors-Dwelling Units	Specialties	Bath accessories (...)	64-Install Scald an...	Install Scald and A...	Common Area	Reference UFAS S...	One-time Re

# As an Exported Excel File: Data & Where It Comes From

	Need Category	Need Item	Component Type	Component
Data Displayed:	Interiors-Dwelling Units	Specialties	Bath accessories (towel bars, grab bars, etc.)	73-Install Compliant Grab Bars at Toilets (UFAS) (Critical Repair)
Data Source:	Components Form	Components Form	Components Form	Components Form



# Source: Components Form

**Components**

**Choose Component**

Need Category: Interiors-Dwelling Units  
Need Item ID: Millwork (doors, trim, cabinets, tops)

Cabinets & vanities

Added Component IDs

- 53-Standard Kitchen Cabinets and Countertops (Unit)
- 66-Install Roll-Under Approach at Sinks (UFAS) (Critical Repair)
- 67-Install Compliant Kitchen Storage (UFAS) (Critical Repair)
- 69-Install Compliant Work Space (UFAS) (Critical Repair)
- 64-Install Scald and Abrasion Sink Wrapping (UFAS) (Critical Repair)
- 73-Install Compliant Grab Bars at Toilets (UFAS) (Critical Repair)

Delete

**Enter/Modify Component Detail**

Component ID: 67-Install Compliant Kitchen Storage (UFAS)

Notes: The common area kitchen, as well as, the kitchens in designated handicapped dwelling units E204, E503, E504, E604, G205, G206, G305, G306, G405, G406, G505, G506, G605, J211, J511, J711 and J811 were observed with 54-58" high upper cabinets, above the required 48" maximum upper cabinets. In

Unit Cost	\$0.00	Unit of Measure	Each	Quantity	17
Type of Utility	N/A	Usage / Year		0.00	
Year Installed	1980	Current Age	38		
Standard Estimated Useful Life	20	Standard Remaining Useful Life	0	Percent Standard Remaining Useful Life	0.0000
		Assessed Remaining Useful Life	0	Percent Recommended Remaining Useful Life	0.0000

Remaining Useful Life Comments: Critical Repair

Add



# Source: Components Worksheet

Components			
Need Category	Need Item ID	Component Type	Component ID
Interiors-Dwelling Units	Millwork (doors, trim, cabin	Cabinets & vanities	53-Standard Kitchen Cabinets and Countertops (Unit)
Interiors-Dwelling Units	Millwork (doors, trim, cabin	Cabinets & vanities	66-Install Roll-Under Approach at Sinks (UFAS) (Critical Repair)
Interiors-Dwelling Units	Millwork (doors, trim, cabin	Cabinets & vanities	67-Install Compliant Kitchen Storage (UFAS) (Critical Repair)
Interiors-Dwelling Units	Millwork (doors, trim, cabin	Cabinets & vanities	69-Install Compliant Work Space (UFAS) (Critical Repair)
Interiors-Dwelling Units	Specialties	Bath accessories (towel bars, grab ba	64-Install Scald and Abrasion Sink Wrapping (UFAS) (Critical Repair)
Interiors-Dwelling Units	Specialties	Bath accessories (towel bars, grab ba	73-Install Compliant Grab Bars at Toilets (UFAS) (Critical Repair)
Interiors-Dwelling Units	Specialties	Bath accessories (towel bars, grab ba	74-Install Compliant Grab Bars at the Toilets (UFAS) (Critical Repair)
Interiors-Dwelling Units	Specialties	Bath/kitchen vent/exhaust fans	79-Remove Bathroom Exhaust Fan Cover (Unit)
Interiors-Dwelling Units	Finished walls, ceilings, flo	Floor tile, ceramic, natural stone	44-Ceramic Tile (Bath)

# More Data Reported in CAP

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

# Yet More Data Reported in CAP

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

# The Last Bit of Data Reported in CAP

	Comments	ASTM Section	Utility Savings Per Year
Data Displayed:	The bathrooms in designated handicapped dwelling units E204, E503, E504, E604, G205, G206, G305, G306, G405, G406, G505, G506, G605, J211, J511, J711 and J811 were observed without compliant grab bars in the showers. The installation of properly sized and located grab bars at the side and rear walls of the showers is required to comply with the UFAS.	3.7.2.4.1	\$0.00
Data Source:	Recommendations Form	System Provided	System Calculated



# Source Alternatives Form

**Alternatives**

**Existing Alternatives**

**Choose Component Type**

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

**Existing Component IDs**

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

**Manage Alternatives**

**Existing Alternatives**

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

**Component ID & Alternative Pairs**

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

**Delete** **Create Pair**

Alternative Name: **Install Roll-Under Approach at Sinks (** Sustainable Alternative Indicator: NO

Notes:

Unit Cost: **\$0.00** Unit of Measure: **Each**

Type of Utility: **N/A** Usage per Year: **0.00** **Update**

EUL: **20** Owner Proposed Indicator: NO

TCO: **\$0.00** **Add**

# Source: Alternatives Worksheet

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

# Source: Recommendations Form

**Repair, Replace, Add New Recommendation**

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

**Component Types**

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

**Component IDs**

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

**Alternative Names**

- Install Roll-Under Approach at Sinks**

**Recommendations**

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

# What if I Need More Space?

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

# More space? Use Narrative Form (Section 7.1)

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



# Possible Alternative-Use a Flag Note

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

# Yet More Spaces for Sketches, Photos, more Text?

- Create an Attachment
- Use a concise descriptive file name:
  - “7.1 Accessibility Deficiencies Exempt”