

## **Supplement 23-04: Property Condition Assessment (PCA) Underwriting Guidance**

Effective: 10/18/23

### **Summary of Changes**

#### **HIGHLIGHTS**

**Effective as of October 18, 2023**, additional underwriting guidance is provided to address the increase in Properties with deferred maintenance and/or critical life safety issues

- · not properly identified, and
- · impacting the
  - Mortgage Loan application,
  - Commitment, and
  - Sponsor's ability to do business with Fannie Mae.

### **Property Condition Assessment (PCA) Underwriting Guidance**

### This guidance:

- is not exhaustive; and
- supplements the
  - Guide, and
  - Instructions on Performing a Multifamily Property Condition Assessment (Form 4099).

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#### You should:

- appropriately exercise your delegated authority;
- provide appropriate
  - training, and
  - vendor feedback;
- prudently underwrite and assess the



- Mortgage Loan, and
- collateral; and
- understand your failure to perform proper due diligence may result in corrective action including
  - reduced delegation,
  - increased loss sharing, or
  - Mortgage Loan repurchase.

Employee Property Condition Training				
Purpose	Guide Requirements	You should		
A robust training program ensures the Property's:  • condition is accurately assessed when  - inspecting the site, and  - reviewing the PCA; and  • expenses are better understood.	Comply with Part II, Chapter 4: Inspections and Reserves, Section 403: Property Condition Assessment (PCA).	Develop a sustainable employee training plan including:		

Screening			
Purpose	Guide Requirements	You should	



### Effective early screening enables you to

- identify physical condition issues, and
- mitigate concerns during quoting and underwriting.

Comply with Part II, Chapter 4: Inspections and Reserves, Section 403: Property Condition Assessment (PCA).

- Understand your Sponsor's:
- overall and market-specific multifamily experience:
- proposed business plan for the Property, including
  - acquisition/rehab,
  - repositioning,
  - improving operations, and
  - optimizing staff across

### properties;

- history of owning or managing assets of similar
  - size.
  - vintage,
  - location,
  - class, and
  - product type;
  - plan to:
    - manage any out-of-state assets;
    - conduct regular on-site visits;
    - appropriately maintain the

### Property; and

- hire an appropriate third-party management firm with relevant market experience; and
  - ownership organization, including
    - capital structure, and
    - ability to issue capital calls.
- Virtually walk the neighborhood and Property assessing its
  - current condition, and
  - surrounding uses.
- Perform online searches for adverse action against the Principals.
- Confirm sufficient estimated expenses for
  - repairs/maintenance, and
  - payroll.

Property Condition Assessment (PCA) Ordering				
Purpose	Guide Requirements	You should		



Effective internal quality controls

- ensure independence, and
- limit external influences.

Per Part II, Chapter 4: Inspections and Reserves, Section 403: Property Condition Assessment (PCA) and Form 4099, you must:

- order the PCA, not external deal participants (e.g., Borrower, broker, correspondent); and
- have an annual quality control program to review
- the quality of the PCAs performed by your PCA Consultant, and
- your compliance with
  - the Guide, and
  - Form 4099.

Establish and maintain processes for ordering PCAs, including:

- reviewing and vetting the PCA Consultant;
- ensuring the PCA scope includes confirmation of any recent value-add capital improvements relied on to mitigate risk; and
- ensuring the credentials and quality of the PCAs and individual field engineers/assessors (who may be independent contractors working for multiple PCA Consultants) through
  - controls,
  - calibration, and
  - feedback.

Underwriting Inspection		
Purpose	Guide Requirements	You should



A thorough underwriting inspection:

- provides a baseline assessment highlighting actual Property conditions;
- serves as a quality control of the third-party underwriting reports; and
- reflects whether the Property:
- is proactively maintained; or
  - has
- Deferred Maintenance,
- Life Safety concerns, or
- components past their useful life.

Per Part II, Chapter 4: Inspections and Reserves, Section 401: Site Inspection and Lease Audit:

- you must randomly select units for inspection;
- photos must include any observed
- Immediate Repairs.
- Deferred Maintenance, or
- Replacement of Capital Items; and
  the inspection must be performed by a
- performed by a qualified individual with experience inspecting similar property types (e.g., Seniors, Students, conventional).

- Ensure the Overall Property Rating reflects the actual asset condition at the time of the inspection, without considering risk mitigants such as
  - to-be-completed repairs,
  - Net Worth/Liquidity,
  - previous experience, or
  - insurance proceeds.
- Use best efforts to inspect the Property before Rate Lock, particularly for a
  - cash-out refinance, or
  - Supplemental Mortgage Loan.
- Ensure the MBA Standard Inspection Form (MBA Form) is completed, including
  - commentary, and
  - photos, including
    - detailed,
    - · close-up, and
- overall components from a distance.
- Reconcile the Overall Property Rating for consistency with sub-ratings (e.g., Overall Property Rating is 2, but Life Safety is 3, and Deferred Maintenance is 3).
- Obtain the Borrower's action plan to remediate or improve:
- anything identified as "Declining" on the Physical Condition & DM tab of the MBA Form; and
- an overall Property Rating of 3 to a 1 or 2.

# Purpose Guide Requirements You should...



Effective internal quality controls

- ensure independence, and
- limit external influences.

Per Part II, Chapter 4: Inspections and Reserves and the Form 4099, you must ensure:

- the Overall Property Rating and assessment reflects the actual asset condition at the time of inspection, without consideration of risk mitigants including
- to-be-completed repairs,
- Net
   Worth/Liquidity,
- previous
   experience, and
- insurance proceeds;
- if available, the PCA Report includes a summary of major capital expenditures over the prior 3 years, including
- improvement name,
  - brief description,
- timing of improvement, and
  - cost;
- the PCA includes all relevant information about any work
  - under contract, or
- observed underway during the site visit; and
- you address, via Immediate Repairs, any Deferred Maintenance and Life Safety concerns.

- Ensure alignment among the
  - underwriting inspection,
  - PCA Report,
  - Loan Documents, and
  - associated
    - photos,
    - captions/comments, and
    - component ratings.
- Ensure the Replacement Reserve amount and Schedule 6 to the Multifamily Loan Agreement Required Repairs Schedule are determined by the Property needs and remaining useful life, regardless of the Mortgage Loan size or structure.
- Confirm that the PCA addresses completion of previously identified Deferred Maintenance and Life Safety concerns for a
  - refinance, or
  - Supplemental Mortgage Loan.
- Ensure, if previously identified required work is incomplete at the time of a Supplemental Mortgage Loan underwriting, the original timeframe remains in place.
- After your review:

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- discuss material issues or misalignment in conclusions with the vendor; and
- elevate unresolved issues to your senior management.

### **Questions**



