SELTZER MANAGEMENT GROUP, INC.

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October 9, 2015

VIA EMAIL

Mr. Ken Reecy Florida Housing Finance Corporation City Centre Building 227 North Bronough Street, Suite 5000 Tallahassee, Florida 32301-1329

RE: RFA 2014-112 – Smaller Developments for Persons with Developmental Disabilities Coulter Group Home – 2015-021G

Dear Mr. Reecy:

At the request of Florida Housing Finance Corporation ("FHFC" or "Florida Housing"), Seltzer Management Group, Inc. ("SMG" or "Seltzer"), has reviewed the response to Request for Application from Life Concepts, Inc. dba Quest, Inc. ("Applicant"). Funding in the amount of \$101,000 is requested by Applicant for the purpose of renovating an existing Community Residential Home ("CRH"). Applicant commits to provide 100% of the bedrooms to persons with Developmental Disabilities as Permanent Supportive Housing.

Applicant owns the existing CRH, which is presently configured as a one-story, 4-bedroom, 2-bath, home of 2,880 sq. ft. that was originally constructed in 1964. The CRH offers shared housing to 6 residents with Developmental Disabilities. Applicant commits to serve 2 Extremely Low Income ("ELI") residents earning 40% or less of the Area Median Income ("AMI") and 4 Low Income residents earning 60% or less of AMI. The Affordability Period is 10 years.

Applicant commits to address life-safety/security issues at Coulter Group Home, retrofit for improved energy efficiency and provide aging-in-place adaptations to improve daily life for its residents.

DEVELOPMENT & SET-ASIDES			
Development Name: Coulter Group Home			
Program Numbers: 2015-021G			
Address: 711 Coulter Place City:	Brandon	Zip Code: 33511	
County: Hillsborough	County Size: Large		
Development Category: <u>Rehab</u>	Development Type:	Single Family	
Construction Type: Wood Frame with brick façade on slab on grade foundation			
Demographic Commitment: Elderly: <u>No</u>	Homeless: <u>No</u> ELI:	2 BedRms@ 40% AMI	
Developmentally Disabled: Yes	Family: No Link:	0 BedRms	

			Revised		Term	Annual
Source	Lender	Applicant		Underwriter	Yrs.	Debt
Grant	FHFC	\$84,000	\$84,000	\$84,000	N/A	\$0
Grant	FHFC	\$17,000	\$17,000	\$17,000	N/A	\$0
Additional Equity	Developer	\$0	\$0	\$11,368	N/A	\$0
Total		\$101,000	\$101,000	\$112,368		\$0

Grant

Terms and conditions of the Grant funding will be embodied in the Restrictive Covenant and Grant Agreement and recorded in the Public Records of the county wherein the Subject Development is located. Violation of any material term or condition of the documents evidencing or securing the Grant shall constitute a default. The Grant funding is revocable if the Grant funds are used for any purpose not permitted under the Request for Applications or Restrictive Covenant and Grant Agreement or if the funds were awarded or disbursed to Grantee based upon fraud or misrepresentation committed during the Compliance Period by the Grantee.

Other Funds

Applicant has reserved funds in the amount of \$11,368 that are committed to addressing life-safety issues, energy retrofit and aging-in-place upgrades for Coulter.

Use of Funds

CONSTRUCTION COSTS:	Applicant Costs	Revised Applicant Costs	Underwriters Total Costs - CUR
Accessory Buildings			
Demolition			
Installation of Pre Fab Units			
New Rental Units			
Off-Site Work			
Recreational Amenities			
Rehab of Existing Common Areas			
Rehab of Existing Rental Units	\$83,443	\$70,640	\$70,640
Site Work			
Swimming Pool			
GeneralConditions		\$12,715	\$12,715
Overhead			
Profit			
Builder's Risk Insurance			
General Liability Insurance			
Payment and Performance Bonds			
Furniture, Fixture, & Equipment			
Total Construction Contract/Costs	\$83,443	\$83,355	\$83,355
Hard Cost Contingency			\$10,596
Other:			
Other:			
Total Construction Costs:	\$83,443	\$83,355	\$93,951

Notes to the Construction Costs:

 The work will be performed by McGhie Construction, Inc. ("McGhie"), Riverview, Florida. Applicant provided SMG a copy of a June 13, 2015 Project Proposal from McGhie, last revised July 28, 2015 in the amount of \$83,355.74. The GC fee reflected is under the maximum 18%

allowed by the RFA. A proposed amendment to the proposal has been provided modifying the draw schedule to reflect two draws. The proposal is unexecuted due to its provision that the proposal becomes a binding contract when the signature of the Applicant is obtained, with only a three day right of cancellation. The proposal reflects retainage in the amount of 10% per draw that shall be held by the servicer during construction until the development is 50% complete. At 50% completion, no additional retainage shall be held from any remaining draws. Applicant confirmed that building permits are included in the scope of work along with the removal of the range and installation of 4 burner range with oven. The McGhie proposal appears reasonable at this time.

- 2. As recommended by the PCA provider, SMG has added a 15% hard cost contingency.
- 3. See Exhibit A for Coulter Group Home Features and Amenities.

GENERAL DEVELOPM ENT COSTS:	Applicant Costs	Revised Applicant Costs	Underwriters Total Costs - CUR
Accounting Fees			
Appraisal			
Architect and Engineering Fees			
Architect's Fee - Green Initiative			
Architect's Fee - Landscape			
Architect's Fee - Site/Building Design			
Architect's Fee - Supervision			
Building Permits			
Builder's Risk Insurance			
Capital Needs Assessment/Rehabilitation			\$1,200
Demolition paid outside Const Contract			
Engineering Fees			
EnvironmentalReport	\$ 3 ,9 5 4	\$ 3 , 9 5 4	\$ 3 , 9 5 4
Federal Labor Standards Monitoring			
FF& E paid outside Construction Contract			
FHFC Administrative Fees			
FHFC Application Fee			
FHFC Credit Underwriting Fee			\$8,000
FHFC HC Compliance Fee (HC)			\$1,000
FHFC Other Processing Fee(s)			
Im pact Fee			
Lender Inspection Fees / Const Admin			\$1,576
Green Building Cert. (LEED, FGBC, NAHB)			
Home Energy Rating System (HERS)			
Insurance			
LegalFees			
Local Subsidy Underwriting Fee			
Market Study			
Marketing and Advertising			
Plan and Cost Review Analysis			\$800
Property Taxes			
Soil Test			
Start-Up/Lease-up Expenses			
Survey			
Tenant Relocation Costs			
Title Insurance and Recording Fees			\$500
Tra ffic Study			
Utility Connection Fees			
Soft Cost Contingency			
Other:			
Other: Blower Door Test	\$82	\$ 8 2	\$82
Other: HVAC Inspection	\$75	\$75	\$75
Other: Termite	\$220	\$220	\$220
Other:			
Total General Development Costs:	\$4,331	\$4,331	\$17,407

Notes to the General Development Costs:

- 1. PNA engaged by SMG at a cost of \$1,200.
- 2. Lender inspection fees estimated at \$450 per inspection with 2 inspections and 4 hours to review the draw requests at \$169 per hour.
- 3. PCA engaged by SMG at a cost of \$800.
- 4. Boundary survey was previously completed. The Applicant is not requesting fee reimbursement.
- 5. Per RFA 2014-112 title insurance and recording fees were estimated at \$250 each.
- 6. Applicant did not budget for any soft cost contingency.
- 7. General development costs appear reasonable at this time.

Third Party Reports

Transaction Screen Process:

SMG received and reviewed a copy of a May 27, 2015, Transaction Screen Process ("TSP") by HSW Engineering, Inc. ("HSW"), Orlando, Florida. HSW states its investigation was performed in accordance with American Society of Testing and Materials ("ASTM") Standard Practice Guidelines generally and, specifically, ASTM E 1528-14. HSW made a site reconnaissance of Coulter, conducted interviews and reviewed historical records, Federal and state databases, and a list of open, inactive, and closed responsible party sites. The site reconnaissance did not reveal any Potential Environmental Concerns ("PECs") associated with Coulter. HSW found 1 responsible party site between a 1/8 and 1/4 mile of Coulter. This site was listed as being Roberts Well Abandon and the site status is reflected as closed.

Asbestos Containing Materials Report:

SMG received and reviewed a May 6, 2015, Report of Pre-Demolition Asbestos Survey by Purity Environmental Services ("Purity"), Tampa, Florida. This report was included in the TSP provided by HSW. Purity conducted a building walk-through of Coulter during which it took samples of suspected Asbestos Containing Materials ("ACM"). Six samples were taken of the sheetrock wall system and pink attic insulation material. The report reflected none of the suspect ACMs contained asbestos; therefore no further investigation was recommended.

Lead-Based Paint ("LBP") Report:

SMG received and reviewed a May 6, 2015, Report of Pre-Demolition Limited Lead Paint Inspection by Purity. This inspection was included in the TSP. The inspection revealed no damaged or peeling paint, therefore no paint samples were collected for lead analyses.

HVAC Inspection:

SMG received and reviewed a June 3, 2015, Air Conditioning Report by Air Support Cooling and Heating, LLC ("Air Support"), Tampa, Florida. The inspection of Coulter was done on the air handler and condenser. The report reflects the inside air handler being in very good condition and the outside condenser reflecting the correct pressures. Air Support has determined that the A/C System is in great condition.

Blower Test Report:

Anthony Gomes of Faraday Energy, LLC performed a Building Leakage Test with a report date of May 21, 2015. Mr. Gomes reported that the Coulter envelope tightness and insulation installation fails to meet the minimum threshold level of 7 Air Changes per Hour ("ACH") with a blower door at a pressure of 50 pascals. Mr. Gomes' Air Distribution System Test reflects moderate duct leakage performance. No further recommendations were made in the report.

Physical Needs Assessment/Plan and Cost Analysis:

SMG engaged and reviewed a copy of a May 4, 2015 Physical Property Condition/Needs Assessment, Costs Review conducted by C3 Consulting Group, Inc. ("C3"), Tampa, Florida, last revised August 21, 2015. The subject building appears to be in average condition. C3 did not observe any structural issues and no other outstanding or previous building violations were observed or reported. The report identified no issues that would be considered life-safety issues. Other than the proposed replacement/repair or modification items outlined in the proposal, there were no other items observed or reported as needing required replacement. C3 notes that the costs of rehabilitation are within industry standards and they recommend a contingency of 15%.

Other items identified in the report are considered by C3 to be in the nature of normal or deferred maintenance that will be addressed by Coulter maintenance personnel as part of normal operations.

LAND ACQUISITION COSTS	Applicant Costs	Revised Applicant Costs	Underwriters Total Costs - CUR
Brokerage Fees - Land			
Land Acquisition Costs			
Land			
Land Lease Payment			
Land Carrying Costs			
Other:			
Other:			
Other:			
Total Acquisition Costs:	\$0	\$ O	\$0

Notes to the Land Acquisition Costs:

 SMG was provided a copy of a February 17, 2000, Warranty Deed by and between Jennifer McKnight Norton fka Jennifer McKnight as Grantor and Life Concepts, Inc., dba Quest as Grantee. The Deed was recorded in the Official Records of Hillsborough County on February 18, 2000, at Book 10055, Page 1332.

FINANCIAL COSTS:	Applicant Costs	Revised Applicant Costs	Underwriters Total Costs - CUR
Construction Loan Application Fee			
Construction Loan Underwriting Fee			
Construction Loan Origination Fee			
Construction Loan Commitment Fee			\$1,010
Construction Loan Closing Costs			
Construction Loan Interest			
Construction Loan Servicing Fees			
Permanent Loan Application Fee			
Permanent Loan Underwriting Fee			
Permanent Loan Subsidy Layering Review			
Permanent Loan Commitment Fee			
Permanent Loan Origination Fee			
Permanent Loan Closing Costs			
Permanent Loan Interest			
Permanent Loan Servicing Fee			
Other:			
Total Financial Costs:	\$ O	\$ O	\$1,010

Notes to the Financial Costs:

1. Applicant will pay at closing a FHFC Grant Fee equal to 1.00% of the grant amount.

OTHER DI	EV ELOPM ENT COSTS	Applicant Costs	Revised Applicant Costs	Underwriters Total Costs - CUR
Develop	oment Cost Before Developer Fee			
and Lan	d Costs	\$87,774	\$87,686	\$112,368
Develop	per Fee on Acquisition of Buildings			
Develop	per Fee			
Develor Reserve	per Fee to fund Operating Debt			
Other:	Brokerage Fees - Land			
	Consultant Fees			
	Excess Acquisition Costs			
	Excess Land Value			
	Guaranty Fees			
Other:				
Other:				
Other:				
	Total Other Development Costs:	\$0	\$ O	\$0
	TOTAL DEVELOPMENT COSTS:	\$87,774	\$87,686	\$112,368

Notes to the Other Development Costs:

1. Applicant has projected \$0 Developer Overhead.

Management Operations and the Ability to Pay Real Estate Taxes, Insurance and Capital Replacement Reserves:

Applicant provided budget documentation for Coulter. The budget reflects the sources of revenues such as RHT, LTRC, transportation, and therapy. The Applicant notes that any losses are not ran as a deficit as Quest is able to cover the losses through its own and overall financial health.

Applicant states that utilization of funds are established on a year-by-year basis per an annual budgeting process. Any utilization of funds over \$100,000 not in the budget must be brought to the Quest Board of Directors Finance Committee for review to determine whether Board approval will be required. Applicant budgets to operate at a surplus to build up funding reserves. This surplus is invested in accordance with the Board's Investment Policy. The Applicant's Finance Committee reviews the financial results monthly to monitor performance versus budget. Management team presents action plans to address issues that could lead to shortfalls versus the budget or deficits.

Applicant holds significant insurance coverage under an umbrella for all its homes and businesses. These premiums are built into the budget annually. Real estate taxes for properties owned are also built into the budget annually.

Development Team:

Applicant was incorporated as Life Concepts, Inc. in May 1980. The name of the organization was changed to Life Concepts, Inc dba Quest, Inc. following the merger of Life Concepts, Inc. and Central Florida Sheltered Workshop, in July 1994. Records of the Florida Secretary of State indicate Applicant is an active corporation. Copies of the original Articles of Incorporation, Amendment to Articles of Incorporation, and a current Florida Certificate of Status were provided to SMG. Its Articles of Amendment reflect the purposes of the organization to be:

- 1. To provide, on a non-profit basis, residential, habilitative and rehabilitative services to developmentally disabled children and adults and elderly persons,
- 2. To provided and/or foster on a non-profit basis, affordable, low-income housing for developmentally disabled adults and elderly persons,
- 3. To provide for supports and services related to social entrepreneurial programs in the furtherance of goals related to subsections (1) and (2) listed above,
- 4. To promote opportunities for collaborations and partnerships through service provision, resource development, advocacy, education and research, and
- 5. To solicit and receive funds outlined for the preceding purposes.

Applicant is governed by a Board of Directors of initially three (3) individuals; the number of Directors may be increased from time to time by the Bylaws, but shall never be less than three (3). Directors shall be elected by the members of the corporation from the membership at annual meetings of the membership. The directors of the corporation must, at all times, be members of the corporation.

Contact Information:

NameJohn Gill, President and CEOAddress:500 E. Colonial Drive
Orlando, FL 32803Phone:(407) 218-4300Facsimile(407) 218-4304Emailjgill@questinc.org

Federal Employer Identification No. 59-2013160

Experience:

Applicant can trace its roots back to 1962 when a group of parents first founded a vocational center dedicated to formal training of their children called the Central Florida Sheltered Workshop ("CFSW"). Life Concepts, Inc. was founded in 1980 with a small grant from the Department of Children and Families where they began providing residential and rehabilitative services to children and adults with disabilities who previously lived in large state institutions. On July 1, 1994, CFSW and Life Concepts merged – forming Life Concepts, Inc dba Quest, Inc. Applicant is a comprehensive provider of services to individuals with intellectual and developmental disabilities throughout Central Florida and Tampa. Through their knowledge and skill set, the Applicant currently provides services at 29 sites in the Tampa and Orlando areas and assists more than 1,000 people each day through day programs and community-based programs. Applicant's residential leadership team boasts a combined 35+ years of experience managing and operating residential community homes.

License:

Applicant provided SMG a copy of Certificate of License No. 5045-6-GA for Coulter valid through September 30, 2016, from the State of Florida Agency for Persons with Disabilities.

Credit Evaluation:

SMG reviewed a June 16, 2015, Experian Business Report for Life Concepts, Inc. dba Quest, Inc. Experian reported satisfactory credit history for Applicant with nothing adverse.

Financial Statement:	Life Concepts, Inc. dba Quest, Inc.
Cash and Equivalents:	\$
Total Assets:	\$
Total Liabilities	\$
Net Assets	\$

Financial data for Applicant is based upon a June 30, 2014, Audit Report by Moore, Stephens, Lovelace, P.A. ("MSL"), Certified Public Accountants, Orlando, Florida. Assets other than Cash and Equivalents are Investments, Accounts receivable, contributions receivable, other Current Assets, and Fixed Assets net of Accumulated Depreciation. Current Liabilities consist primarily of accounts payable, accrued expenses and payroll, and deferred revenue. Long Term Liabilities include Mortgage Payable of \$ and a capital lease of \$ and a capital leas

Applicant currently has no Contingent Liabilities per a Statement of Financial and Credit Affairs dated June 12, 2015. Applicant, however, is currently in litigation with three former employees regarding a Worker's Compensation related complaint and with two pending general liability claims. Applicant states they carry enough insurance to cover any settlement that may be required.

<u>Developer</u>

The Applicant is acting as Developer for this transaction.

Property Manager

The Applicant will act as the Property Manager. Bill Aldinger of Florida Housing has approved Applicant's Resident Community Services Plan.

General Contractor:

Name	McGhie Construction, Inc.
Contact Name	Gregory N. McGhie, President
Address	13509 Mango Bay Drive Riverview, Florida 33579
Phone Facsimile	(813) 966-3707 (813) 671-4121

E-Mail gregory@mcghieconstruction.com

Florida GC License CBC1258471 in the name of Gregory N. McGhie valid through August 31, 2016.

Business references are satisfactory.

SMG reviewed a September 23, 2015, Experian Credit Report for McGhie Construction, Inc. and considers it satisfactory. The report contained limited trade payment experience and no adverse information was contained therein.

SMG did not receive a resume, financial statements, or deposit verifications for the General Contractor. The General Contractor stated that a Payment and Performance Bonding letter would be provided during credit underwriting; however, SMG has not received this documentation. The receipt and review of P & P Bonds in the full amount of the construction contract issued through an insurance company rated at least A- by A.M. Best with a financial size category of XI is a grant closing condition of this report.

Summary and Recommendation

SMG concludes that the conditions for grant approval as set forth in RFA 2014-112 and Rule 67-60 F.A.C., have been met. SMG therefore recommends FHFC approve the grant funding, subject to the following:

- 1. Execution by Applicant of any documents FHFC deems necessary including, but not limited to, the Restrictive Covenant and Grant Agreement, a Rehabilitation Completion Guaranty and an Environmental Indemnity.
- Evidence of adequate insurance sufficient to meet the standards established in Part IIIB, Chapter 9, Section 911 of the Fannie Mae Multifamily Delegated Underwriting and Servicing Guide, effective April 29, 2011.
- 3. Evidence of additional equity in the amount of \$11,368 as required.
- 4. Execution by Applicant of the project proposal provided by McGhie Construction, Inc. and execution of the proposed amendment to the proposal by McGhie Construction, Inc.
- 5. Receipt and review of a satisfactory P&P Bonds in the full amount of the construction contract issued through an insurance company rated at least A- by A.M. Best with a financial size category of XI.
- 6. Satisfactory resolution of any outstanding Past Due and Noncompliance Issues.
- 7. Payment of any outstanding arrearages to FHFC, its legal counsel, its servicer or any agent or assignee of FHFC for past due issues applicable to the Development Team (Applicant or Developer or Principal, Affiliate or Financial Beneficiary, as described in Exhibit B of the RFA of an Applicant or a Developer).
- 8. Payment of a Grant Commitment Fee equal to 1.0% of the amount of the entire funding amount up to a maximum of \$2,000.
- 9. Prepayment of Compliance Monitoring Fees at a rate of \$100 per year for 10 years (the Compliance Period).
- 10. All other Due Diligence required by FHFC and its legal counsel.

If you have any questions or if I can be of further assistance, please call me at (850) 233-3616, ext. 266, or contact me at my E-Mail address of <u>brian@seltzermanagement.com</u>.

Sincerely,

SELTZER MANAGEMENT GROUP, INC.

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Brian Barth Associate Underwriter

EXHIBIT "A" RFA 2014-112 Financing to Build or Rehabilitate Smaller Permanent Supportive Housing Properties for Persons with Developmental Disabilities (COULTER GROUP HOME/ 2015-021G) DESCRIPTION OF FEATURES AND AMENITIES

A. The Development will consist of 6 bedrooms and 3 bathrooms

Developments that are renovation an existing Community Residential Home must meet the following requirements:

- 1. If only retrofitting (i.e. construction will not include adding bedrooms), there must be no more than two (2) residents sharing a private bedroom with locking door.
- 2. For every three residents, there must be at least one full bathroom that is accessible to them with a locking door;
- 3. Community Residential Homes must not have more than six (6) residents per Unit.
- B. The Development is to be constructed and will conform to requirements of local, state & federal laws, rules, regulations, ordinances, orders and codes, Federal Fair Housing Act as implemented by 24 CFR 100, the 2012 Florida Accessibility Code for Building Construction as adopted pursuant to Section 553.503, F.S., and Titles II and III of the Americans with Disabilities Act ("ADA") of 1990 as implemented by 28 CFR 30, incorporating the most recent amendments, regulations, and rules, as applicable.
- **C.** The Development must provide the following Green Building, Accessibility, Adaptability, Universal Design and Visitability Features:
 - 1. Termite prevention and pest control throughout the entire affordability period; and
 - 2. A full-size range and oven in all Units.

All developments that are (i) <u>Adding Units that Serve Persons with Developmental Disabilities</u> through rehabilitation; (ii) <u>Adding Units</u> through a combination of new construction and rehabilitation; or (iii) <u>Renovating Existing Units that are Currently Occupied by Persons with</u> <u>Developmental Disabilities</u> must carry out these items during construction:

- 1. Replace all bathroom exhaust fans with Energy Star qualified fans;
- 2. Install WaterSense qualified aerators on all faucets;
- 3. Install low-flow showerheads (2.2 gallons per minute or less);
- 4. Replace any toilets with gallons per flush higher than 1.6 gpf with WaterSense qualified toilets;
- 5. If any interior painting in done, it must be done with low VOC or no VOC paint;
- 6. If replacing an existing refrigerator, it must be replaced with an Energy Star qualified refrigerator;
- 7. If replacing an existing washing machine, it must be replaced with an Energy Star qualified washing machine; and
- 8. If replacing an existing dishwasher, it must be replaced with an Energy Star qualified dishwasher.
- D. Within existing Units or potions of a Unit that are being retrofitted, the features listed below must be incorporated to the maximum extent feasible within the scope of the retrofit work planned by the Applicant. The maximum extent feasible shall be determined by the scope of work and the construction features that are affected by the retrofit work. Any major change affecting the features such as remodeling, renovation, rearrangement of structural parts or walls or full-height partitions requires compliance with accessibility requirements below. For

EXHIBIT "A"

RFA 2014-112 Financing to Build or Rehabilitate Smaller Permanent Supportive Housing Properties for Persons with Developmental Disabilities (COULTER GROUP HOME/ 2015-021G) <u>DESCRIPTION OF FEATURES AND AMENITIES</u>

the purposes of this RFA, normal maintenance, re-roofing, painting or wallpapering, or changes to mechanical and electrical systems are not considered alterations.

Where an alteration affects a construction feature, accessibility is required to the maximum extent feasible.

- 1. Primary entrance door shall have a threshold with no more than a ¹/₂-inch rise;
- 2. All door handles on primary entrance door and interior doors must have lever handles;
- 3. Lever handles on all bathroom faucets and kitchen sink faucets;
- 4. Toilets must be 17 inches to 19 inches in height as measured from the finished floor to the top of the toilet seat;
- 5. Mid-point on light switches and thermostats shall not be more than 48 inches above finished floor level.

Applicants that propose to add Bedrooms and a bathroom to an existing Community Residential Home must make these rooms fully accessible in accordance with the Residential dwelling units provision of the 2010 ADA Standards for Accessible Design.

Existing Units or portions of a Unit that are to be retrofitted and are serving Residents with a physical disability, including persons aging in place and those with mobility impairments, must include all accessibility, adaptability, universal design and Visitability features listed in (D) above. In addition the following mobility features must be included: Units serving Residents with a physical disability, including persons aging in place and those with mobility impairments, must include the following:

- 1. At least one bathroom with the following features (See 2010 ADA Standards for Accessible Design, Sections 809.2-809.4 for specifications for each of these features):
 - A clear floor space beyond the arc of the bathroom door swing. Door shall be permitted to swing into the clear floor space or clearance required for any fixture.
 - Clear floor space around toilet, sink, and tub/shower combination;
 - Grab bars at tub/shower; and
 - One of the following:
 - Roll-in shower;
 - Shower with a transfer seat; or
 - Bathtub with a seat, either a permanent seat or a removable in-tub seat.
- 2. Bathroom doorway with a clear opening of not less than 32 inches;
- 3. Primary entrance doorway with a clear opening not less than 32 inches;
- 4. Primary entrance door must have threshold with no more than a ¹/₂-inch rise;
- 5. An accessible route that connects all spaces and elements that are part of the residential dwelling unit; and
- 6. All doorways to bedrooms and common space rooms must have clear opening not less than 32 inches.