



Staff Report on CalHFA MHSA Housing Loan Program Conversion
August 16, 2016

Background: The MHSA Housing Loan Program sunset May 30, 2016 as a result of the expiration of the interagency agreement between the Dept. of Health Care Services and the California Housing Finance Agency (CalHFA). A new, voluntary program, Local Government Special Needs Housing Program (SNHP) is being offered by CalHFA to local governments who would like to continue to use CalHFA services. The SNHP will use MHSA funds with other local funds to finance future development of permanent supportive rental housing for persons with serious mental illness (and their families) who are homeless or at risk of homelessness. Communities that choose not to participate in the new SNHP will have any remaining, unencumbered balances in the MHSA Housing Loan Program returned for local use. Counties must decide whether they want to participate in the new SNHP or have unencumbered funds remaining in the MHSA Housing Loan program returned by September 30, 2016.

Decision points:

- 1) Should Contra Costa County participate in the new CalHFA Special Needs Housing Program or have current unencumbered balance of funds returned to the County?
- 2) Should residual receipt loan payments received under the MHSA Housing Loan program be rolled into the new CalHFA SNHP?

Projects currently funded:

SCO ACCT #	DATE FUNDS RECEIVED	DISCRETIONARY ACCOUNT Balance as of 5/4/2016	ORIGINAL MHSA HP LOAN ACCOUNT FUNDS	ORIGINAL OPERATING SUBSIDY RESERVE FUNDS	ACTUAL AMOUNT ASSIGNED FUNDS (ALLOCATION)
LOCALITY					
Contra Costa	2/4/2008	\$226,110.54	\$6,087,200	\$3,043,600	\$9,130,800

	STATUS	CalHFA#	PROJECT NAME	SENIOR STAFF APPROVAL DATE	MHSA CAPITAL HP LOAN AMT	MHSA COS RESERVE
1	Closed	09-019-M	Lillie Mae Jones	01/27/10	\$715,000	375,000.00
	Occupied		9/15/10, 06/16/11, 08/04/11		\$5,372,200	2,668,600.00
1	Closed	10-060-M	Anka Behavioral Health, Inc.	11/01/10	\$368,000	437,500.00
	Occupied			01/30/12	\$5,004,200	2,231,100.00
	Committed/withdrawn	11-039-M	Tabora Gardens 1,081,600/0	02/28/14		
	Borrower requesting		540,800 in COSR needs to come from Capital as a	02/26/15	\$5,004,200	2,231,100.00
1	closed	12-030-M	Anka Behavioral Health, Inc. 2	11/01/10	\$485,000	437,500.00
	Occupied			02/19/14	\$4,519,200	1,793,600.00
1	Closed	12-032-M	Robin Lane Apartments	07/23/12	\$560,000	560,000.00
	Occupied				\$3,959,200	1,233,600.00
1	Closed	12-034-M	Ohlone Gardens	07/16/12	562,430	562,430.00
	Occupied				\$3,396,770	671,170.00
					\$3,396,770	671,170.00
1	committed	13-001-M	Arboleda (FKA Third Avenue Apartments)	02/28/13	\$1,368,864	
	Borrower requesting		806,434 in COSR needs to come from Capital as a MOESR and included in the		\$2,027,906	671,170.00
1	Closed	14031-M	Anka Behavioral Health, Inc. 3	11/01/10	\$675,700	527,000.00
				06/10/15	\$1,352,206	144,170.00
					\$1,352,206	144,170.00
					\$1,352,206	144,170.00
7				BALANCES	\$1,352,206	144,170.00

Current unencumbered balance (capital, operating reserve, discretionary): \$1,722,486.54

Estimated annual residual receipt payments (based on 2014 data): \$8,000-\$12,500/yr

Lillie Mae Jones \$500 to \$2,000/year for first 15 years
Robin Lane \$2,000 to \$2,500/year for first 15 years
Third Avenue Apts \$5,500 to \$8,000/year for first 15 years

Detail of Special Needs Housing Program:

Please see attach term sheet for greater detail

Comparison Summary:

	SNHP	Local (Behavioral Health)
Eligible activities:	Construction, acquisition, rehabilitation; and capitalized operating subsidies	Rental assistance or capitalized operating subsidies; security deposits, utility deposits, or other move-in cost assistance; utility payments; moving cost assistance; and capital funding to build or rehabilitate housing for homeless, mentally ill persons or mentally ill persons who are at risk of being homeless
Capacity:	CalHFA has the expertise to understand complex affordable housing finance proposals and underwriting nuances that affect the viability and long term affordability of MHSA regulated units.	BH does not have the housing finance expertise in house and would need to contract/partner to deliver supportive capital development projects. However, if using for other housing activities – current staff capacity may be sufficient.
Cost/fees to the County:	One-time 3% program participation fee for existing projects @ ~\$51,000. 5% program participation fee: \$400-\$600/yr (if no new funds are deposited)	>\$50,000/yr. We will need to partner with an agency or consultant w/ housing finance expertise in order to administer this program at the local level should we decide to target any funds toward development of housing.
Limitations:	None: Counties may opt-in and opt out at any time.	Any funds received back from the MHSA Housing Loan Program must be spent within 3yrs, unless moved into the Housing and capital facilities allocation (once a project has been identified) that will allow for a 10 year spend down.
Opportunities	To allocate future MHSA dollars (and other funds) to the SNHP for CalHFA to administer for capital development projects.	Demand for additional rental subsidies is high, as well as utility assistance and security deposits.
Timeline	Participant agreements, release of unused program funds, and allocation of future residual loan payments due by Sept. 30, 2016 with Board of Supervisor's Approval.	

Staff Analysis:

Participation in the new SNHP would offer Contra Costa the ability to leverage the expertise of CalHFA to administer capital development funds for the creation of new MHSA housing units in our community. At a relatively low fee, the new program could offer the County the housing finance expertise that is currently not available in-house. Contra Costa recently had a MHSA Housing Loan funded program return their award of funds citing that other funds had been secured and “MHSA units would make the building unnecessarily complicated from a management perspective.” With the amount of unencumbered funds currently remaining at \$1.7M, it may be attractive for another developer to apply for the funds to complete their project. New construction projects can take 2-7 years before it’s ready to occupancy and any funds transferred to the new program would be limited to construction, rehabilitation, acquisition, and operating reserves.

Bringing the funding back into the community offers expanded opportunity to utilize the funds for housing assistance including, short-term master-leasing and tenant-based subsidies that are not currently available through the new CalHFA SNHP and may be desirable as it adds flexibility in how housing dollars can be spent. However, the 3-yr time limit on utilization of funds returned to the County may pose a challenge if only looking to utilize released funds for rental subsidies – particularly with the tight housing market. The County may need to look at diversifying how funds could be used in order to minimize risk of funds being recaptured. However, if there is a project that is pending or on the horizon that could use the \$1.7M, or portion thereof, as a one-time cost for acquisition, rehabilitation, or construction – including capitalized operating reserve, then it may be advantageous to bring it back into the county as it would allow funds to be expended within the required timeframe.

If the County were to consider new capital development projects, the administration of capital funds and operating reserves take special expertise that is currently not available within the Behavioral Health department. In order to effectively administer such activities, Behavioral Health would need to partner with consultants or other County departments that have expertise in housing finance. This comes with a cost that is not yet known but most likely will be greater than the County participation fees required of the new SNHP offered. County DCD does not have the expertise or current capacity to support the administration of capital operating reserves. If DCD were to provide this service for Behavioral Health, they would need to add county staff which could be cost prohibitive and partnering with CalHFA would be advantageous.

It is important to note that any County may choose to participate in the new SNHP at any time.

Other information:

See attached Information notices from DHCS regarding use of dollars if returned locally.

Key informants:

Debra Starbuck, Lead MHSA/SNHP Housing Finance Officer, CalHFA
Kara Douglas, Affordable Housing Director, Contra Costa Department of Conservation and Development
Donna Ures, California Department of Health Care Services
Warren Hayes, MHSA Program Manager, Contra Costa Behavioral Health

Recommendation to BH Administration:

Upon conferring with the Behavioral Health Director, Deputy Director, and MHSA Program Manager, there are currently a number of possible housing projects and activities that would be eligible and could benefit from the return of MHSA Housing Program funds held by CalHFA funds to Contra Costa without compromising the three year time limitation on use. Therefore, it is recommended to:

- Request return of the \$1,722,486.54 held by CalHFA to the County to be used for eligible housing activities
- Additionally, return any future residual payments for projects that were funded under the original MHSA Housing Program (CalHFA) to the County.



LOCAL GOVERNMENT SPECIAL NEEDS HOUSING PROGRAM TERM SHEET FOR PARTICIPATING AGENCIES

The California Housing Finance Agency ("CalHFA"), on behalf of jurisdictions throughout California, operates the Local Government Special Needs Housing Program ("SNHP"). The SNHP allows local governments ("LG") to use Mental Health Services Act (MHSA) funds with other local funds (collectively "SNHP Funds"), to provide financing for the development of permanent supportive rental housing ("Project") that includes units restricted for occupancy by individuals with serious mental illness (and their families) who are homeless or at risk of homelessness ("MHSA Clients"). To participate, an LG must enter into a SNHP Participation Agreement with CalHFA.

- A participating LG assigns funds to CalHFA in advance of approving financing for Projects in its jurisdiction.
- Eligible Projects are Rental Housing (5 or more units) or Shared Housing (1-4 units) for MHSA clients who rent lockable bedrooms within a single family home, duplex, tri-plex or four-plex. Projects must reserve a minimum of 5 units (or bedrooms in shared housing) for referred MHSA Clients (each a "SNHP Regulated Unit") and the minimum SNHP Loan amount per Project is \$500,000. NOTE: Master Leasing is not a permitted use of funds.
- The LG may offer a capitalized operating subsidy reserve ("COSR") to subsidize operating costs for the SNHP Regulated Units – or to supplement an existing MHSA Housing Loan Program COSR serviced by CalHFA. COSR's must last a minimum of 17 full years unless waived by the LG. The LG may require the developer to fund the shortfall, or entire COSR amount if other subsidies aren't available to the MHSA clients and the proposed rents aren't deemed affordable for the MHSA clients.
- MHSA Clients in SNHP funded one bedroom units assisted with COSR must pay a minimum rent that is the higher of 30% of SSI/SSP or 30% of their household income (less utilities unless included in the rent). Larger units would pay rents that are the higher of an additional \$100/month rent per additional bedroom, or 30% of household income (less utilities unless included in the rent).
- MHSA rents may not exceed 30% of HUD published 30% AMI levels (adjusted by family size). NOTE: There are no income limits imposed by the SNHP Regulatory Agreement. Any income restrictions, or occupancy restrictions overlaying the SNHP Regulated Units must be approved by the LG (per SNHP Financing Application Attachment B-1 signed by the Developer/Borrower and LG).
- Developer/Borrower is required to continually seek future commitments of rental or operating subsidies for the SNHP Regulated Units (e.g., project based Section 8) for the life of the SNHP Loan.
- The LG and Developer jointly submit an application to CalHFA for analysis of the financial viability of a proposal. CalHFA's role is to recommend maximum loans and COSR funding levels so Projects aren't over subsidized; provide evidence of Loan/COSR approvals to LG and Borrower; Issue a Commitment Letter following receipt of tax credits (if applicable); close and fund the SNHP Loan and COSR; monitor the Project during construction through occupancy; and service the SNHP Loan and administer the COSR for as long as COSR funds are available.

County Participation Fees (non-refundable and payable upon receipt of LG funds assigned to CalHFA)

- **3% Program Participation Fee:** for all unencumbered MHSA funds that the LG authorizes be transferred from the MHSA Housing Loan Program to the SNHP before September 30, 2016.
- **5% Program Participation Fee:** for any new LG funds transferred to CalHFA for use in the SNHP (including future MHSA Residual Receipt Loan payments received by CalHFA and authorized by LG to be transferred to the SNHP).

Fees Paid By Developer/Borrower:

- **1% Local Government Ap Fee:** LG may recoup a portion of the Participation Fee by charging Developers a 1% Local Government Ap Fee. This Fee is collected by CalHFA at SNHP Loan closing and deposited into the LG's SNHP Account at CalHFA.
- **\$2,500 CalHFA Application Fee:** A non-refundable fee paid by the Developer at time of submittal of a SNHP Loan Application to CalHFA. This Fee is applied towards the 1% CalHFA Underwriting Fee.
- **1% CalHFA Underwriting Fee:** This Fee is based on the total sum of SNHP Funds provided by LG to a Project. Full payment is due at SNHP Loan closing.

SNHP Recommended Funding Amounts & Terms

SNHP Capital Development Loan & Required Reserves	Capitalized Operating Subsidy Reserve (COSR)
<ul style="list-style-type: none"> • <u>Recommended 2016 SNHP Loan Limits</u> - \$140,000 per SNHP Regulated Unit (increasing by up to 4%/year) • <u>Eligible Use:</u> construction and/or permanent financing (no predevelopment loans) • <u>Interest Rate:</u> 3% simple interest loan; residual receipts payments required be paid from 50% of surplus cash flow • <u>Loan Term:</u> 20 to 57 years • <u>Capitalized Operating Expense Reserve:</u> 25% of the first year's approved operating and reserve budget • <u>Required Replacement Reserve:</u> New Construction: \$500 per unit/annually for all units in a Project, increasing by 5% every five years. Capitalized and annual deposits to RR's for rehab projects will be determined by the results of a Physical Needs Assessment and/or Building Inspection Reports and a Replacement Reserve Needs Analysis. • <u>MHSA Client Rent & Utility Assistance Reserve:</u> reserve that Developer must fund by completion of a Project when required by LG. Reserve should equal 3 years minimum projected rental income for the SNHP units (assuming rents at 30% of SSI/SSP). Reserve may be held by Borrower as a revolving fund to cover rent and utility payments for MHSA residents waiting for SSI/SSP approval. • <u>CalHFA Annual Servicing Fee:</u> \$2,500 for Shared Housing Projects with 1-4 units; \$7,500 for five or more SNHP regulated units in a Rental Housing Development. 	<p>For Projects with SNHP Loans:</p> <ul style="list-style-type: none"> • <u>Recommended 2016 COSR Limit</u> - \$140,000 per assisted unit (increasing by up to 4% a year). • <u>COSR Amount and Term:</u> Each COSR is sized to pay a pro-rata share of the Project's operating expenses and sized to last a minimum of 17 years assuming a 10% vacancy rate* of the SNHP units; 1% SNHP rental income inflation rate; and a 3.5% operating budget inflation rate. (*a 30% vacancy rate is assumed for Transitional Aged Youth regulated units). • <u>Funded:</u> COSR's are capitalized at SNHP Loan closing and serviced by CalHFA. • <u>Disbursements:</u> COSR funds are disbursed beginning at Certificate of Occupancy, and reconciled annually prior to future COSR advancements. • <u>CalHFA Annual COSR Servicing Fee:</u> \$5,000 <p>For Projects with MHSA Housing Program Loans:</p> <ul style="list-style-type: none"> • A deposit of any amount may be added to an existing MHSA Housing Program funded Project with an existing COSR Agreement. For Projects with tax credits, annual COSR Servicing Fees of \$5,000 will not be billed to the Project until such time as the Project refinances at the end of the initial tax credit compliance period.

Local Government Application & Approval Process

- LG solicits/selects proposals for the construction or acquisition and renovation of rental units using MHSA and local funds transferred to CalHFA for use under the SNHP.
- For each SNHP Project, LG determines or approves: 1) the number and size units (by bdrm count) of the SNHP Regulated Units; 2) age related occupancy restrictions (for Transition Age Youth, Family, or Senior MHSA eligible clients and their families); 3) any permitted MHSA client sub-class preferences (i.e. veterans,



LOCAL GOVERNMENT SPECIAL NEEDS HOUSING PROGRAM TERM SHEET FOR PARTICIPATING AGENCIES

chronically homeless); 4) any other Lender or subsidy required occupancy restrictions that overlay the SNHP regulated units that are more restrictive than required by the SNHP; 5) the maximum SNHP Loan; and 6) the required COSR term (if any) and who is responsible for funding the COSR.

- LG commits to provide supportive services that meet the needs of the MHSA Clients for the term of the SNHP Loan and develops a Supportive Service Plan (“SSP”) that addresses the Project’s MHSA client needs. A draft SSP is required as part of the CalHFA SNHP Application, and a final SSP is required prior to the SNHP Loan closing and will be an attachment to the SNHP Regulatory Agreement.
- LG negotiates a Memorandum of Understanding between the LG, Borrower, property manager, and primary service provider and provides a copy to CalHFA prior to occupancy of the SNHP regulated units.
- LG ensures adequate funds have been assigned to CalHFA to finance all proposed SNHP Projects and COSR’s before allowing a Developer to submit a SNHP Financing Application to CalHFA.
- LG is responsible for reporting the use of MHSA funds as required by State DHCS or other state agency.
- To the greatest extent feasible, LG shall utilize the local coordinated entry system to screen for eligible residents.

CalHFA Application Process

- LG and Developer/Borrower jointly submit a CalHFA SNHP Financing Application with the required \$2,500 Application Fee (paid by the Developer); the signed Local Government Certification (Attachment A); the Draft Supportive Service Plan (Attachment A-1); the signed Developer/Borrower Certification (Attachment B); and the signed and approved SNHP Regulated Unit Occupancy Restrictions (Attachment B-1).
- When the LG indicates a Project should have a COSR, CalHFA analyzes and recommends the COSR amount needed to carry a Project through the first 17 years of operations. The Borrower is responsible for funding the difference between the LG COSR commitment and CalHFA’s recommended minimum funding level. COSR funds are held and administered by CalHFA per a SNHP COSR Agreement.
- Application Submittal Instructions and the SNHP Financing Application (Universal Application), Attachments, and required submittal checklist are available on CalHFA’s SNHP website on the “Developer Application” tab.
- The SNHP Loan closing checklists, boilerplate non-negotiable SNHP loan docs, and COSR Agreement will also be posted on the CalHFA website on the “Boilerplate Documents” tab.
- The SNHP Regulatory Agreement and Deed of Trust will be recorded in lien priority based on the SNHP Loan size in relation to other residual receipt loans, unless otherwise approved by the LG.

CalHFA Contact Information:

Debra L. Starbuck, Lead SNHP Housing Finance Officer, (530) 878-8075; dstarbuck@calhfa.ca.gov

Refer to Website for more Information:

<http://www.calhfa.ca.gov/multifamily/snhp/index.htm>

NOTE: This term sheet is subject to change.



State of California—Health and Human Services Agency
Department of Health Care Services



EDMUND G. BROWN JR.
GOVERNOR

DATE: June 9, 2016

MHSUDS INFORMATION NOTICE NO.: 16-025

TO: COUNTY BEHAVIORAL HEALTH DIRECTORS
COUNTY DRUG & ALCOHOL ADMINISTRATORS
COUNTY BEHAVIORAL HEALTH DIRECTORS ASSOCIATION OF CALIFORNIA
CALIFORNIA COUNCIL OF COMMUNITY BEHAVIORAL HEALTH AGENCIES
COALITION OF ALCOHOL AND DRUG ASSOCIATIONS
CALIFORNIA ASSOCIATION OF ALCOHOL & DRUG PROGRAM EXECUTIVES, INC.
CALIFORNIA ALLIANCE OF CHILD AND FAMILY SERVICES

SUBJECT: MENTAL HEALTH SERVICES ACT: END OF PROGRAM-RELEASE OF UNENCUMBERED FUNDS DEDICATED TO THE MENTAL HEALTH SERVICES ACT HOUSING PROGRAM

The purpose of this Information Notice is to inform counties of upcoming changes to the Mental Health Services Act (MHSA) Housing Program and additional action required of the counties. DHCS and the California Housing Finance Agency (CalHFA) jointly administer the MHSA Housing Program through an interagency agreement that expired on May 30, 2016. After this date, no further MHSA Loans or Capitalized Operating Subsidy Reserves (COSRs) will be approved by CalHFA under the MHSA Housing Program. The Local Government Special Needs Housing Program (SNHP) will replace the existing MHSA Housing Program.

This Information Notice applies to any county that 1) has unencumbered MHSA Housing Program funds on deposit with CalHFA and/or 2) has existing MHSA Housing Program loans or COSRs. NOTE: MHSA funds are considered encumbered once CalHFA senior staff approve funds for a loan or COSR.

Because the MHSA Housing Program is expiring, CalHFA must release any remaining MHSA funds to counties by November 30, 2016. The forms that a county must complete depend on whether the county has 1) an existing MHSA Housing Program development and/or 2) unencumbered funds.

Counties that have financed a MHSA Housing Project

If a county has financed a MHSA Housing Project (see Attachment D, column 4) the county must complete the Ongoing Annual MHSA Fund Release Authorization for Future Unencumbered Funds (**Attachment A**). Attachment A is necessary because it advises CalHFA how to handle future funds that may be received by CalHFA on behalf of the county. These funds may include deposits of disencumbered MHSA Housing funds (i.e., COSR funds that are no longer required by a Project, or funds approved for a loan that is never funded), MHSA residual receipt loan payments, and accrued interest. Funds will be released annually by CalHFA by May 1st of each calendar year starting in 2017. County options for unencumbered or disencumbered funds are to release and return all funds to the City/County, or to release and assign all funds to the CalHFA administered SNHP for use in financing the development of permanent supportive housing and to provide capitalized operating subsidies (if applicable) for projects housing MHSA eligible tenants. If a county elects to authorize the continual assignment of future available MHSA funds to the SNHP, CalHFA will report the amount of funds assigned to the county on an annual basis.

If a county also has unencumbered funds on deposit with CalHFA as of May 31, 2016, (see Attachment D, column 3), the county must complete the MHSA Housing Loan Program Fund Release Authorization for Existing Unencumbered Funds form (**Attachment B**).

The county has three options for the use of the unencumbered funds:

- (1) Request CalHFA release and transfer a percentage of funds to specified MHSA Project COSRs administered by CalHFA. Counties choosing this option must complete the MHSA Fund Release and Transfer Authorization form (**Attachment C**); and/or
- (2) Request CalHFA release and return all or a specified amount of funds to the City/County; and/or
- (3) Release and assign the balance of funds to CalHFA's new Local Government SNHP for use in financing the development of permanent supportive housing and to provide capitalized operating subsidies (if applicable) for projects housing MHSA eligible residents.

Counties that have not financed a MHSA Housing Project as of May 31, 2016

If a county has not financed a MHSA Housing Project and has unencumbered funds on deposit with CalHFA as of May 31, 2016, (see Attachment D, column 3), the county must complete the MHSA Housing Loan Program Fund Release Authorization for Existing Unencumbered Funds form (**Attachment B**).

Instructions for Submission

Forms must be signed by the mental health director and approved by the Board of Supervisors.

Completed forms with evidence of Board of Supervisors approval must be sent to the address below:

California Department of Health Care Services
Mental Health Services Division
MHSA Program and Fiscal Oversight Section
1500 Capitol Avenue, MS 2704
Sacramento, CA 95899-7413

Deadline for submitting forms is September 30, 2016.

Upon receipt, the Department will sign and forward the completed forms to CalHFA. CalHFA will process the forms and, if applicable, release to the requesting county the requested unencumbered funds by check, including accrued interest. For questions about MHSA fund balances, please contact Jennifer Beardwood with CalHFA at jbeardwood@calhfa.ca.gov or (916) 326-8805.

Use of Funds: Counties must spend released Mental Health Services Funds monies to provide "housing assistance" to the target populations identified in Welfare and Institutions Code (W&I) Section 5600.3 (W&I Section 5892.5 (a)(1)). Housing assistance means rental assistance or capitalized operating subsidies; security deposits, utility deposits, or other move-in cost assistance; utility payments; moving cost assistance; and capital funding to build or rehabilitate housing for persons who are seriously mentally ill and homeless or at risk of homelessness (W&I Section 5892.5 (a)(2)).

Administration of Funds: A County's administration of released Mental Health Service Funds is subject to the requirements of the MHSA (W&I Section 5892.5 (b)) including, but not limited to, the following:

- The County must follow the stakeholder process identified in W&I Section 5848 when determining the use of those funds;
- The County must include the use of those funds in the County's Three-Year Program and Expenditure Plan or Annual Update, per W&I Section 5847;
- The County must account for the expenditure of those funds in the County's Annual Revenue and Expenditure Report (W&I Section 5899). Reporting will begin in the fiscal year when the MHSA Housing Program funds were released to the County by CalHFA; and
- The County must expend those funds within three years or the funds will be subject to reversion (W&I Section 5892 (h)).

If you have any questions, please contact Donna Ures at donna.ures@dhcs.ca.gov or (916) 324-0401.

Sincerely,

Original signed by Brenda Grealish for

Karen Baylor, Ph.D., LMFT, Deputy Director
Mental Health & Substance Use Disorder Services

Attachments

Attachment A: Ongoing Annual MHSA Fund Release Authorization for Future Unencumbered Funds

Attachment B: Fund Release Authorization for Existing Unencumbered Funds

Attachment C: Fund Release and Transfer Authorization

Attachment D: MHSA Housing Program Fund Balance