

**From:** Joe P. Wilczewski  
**Sent:** Monday, October 15, 2018 12:08 PM  
**To:** Nicholson, Laura 6-9190; Maddox, Jeff 6-9197  
**Subject:** Comments to 2019 TC Manual/QAP

Good Morning,

I had just a couple comments I would like you to consider on the 2019 TC Manual/QAP draft.

1. Capping the appraisal cost at \$1,500. I believe that amount may be fine for new construction where it is simply land and a proforma statement, but on an acq/rehab, the appraiser must walk many units, look at historical information and evaluate, etc. In addition, in the RHS set-aside, they must abide by many other USDA requirements, as RD uses the appraisal for many reasons (as opposed to the market study which they do not require). We currently are paying \$5,500 for an appraisal which is the market rate.
2. Implementing the cost certification audit report requirement for developments where there is not an identity of interest/related party seems unnecessary and an additional large cost. I do understand the reasoning behind it being a CPA/auditor by trade, but with no relationship between the developer and contractor, I do not see this adding any value or purpose.

If you would like to discuss either point in more detail, please let me know and I can stop by with the next placed in service applications I drop off. Thank you for your assistance and cooperation always.

Joe Wilczewski  
Boyd Management, Inc.  
(803)419-6540  
fax (803) 419-6576