

CITY OF LOS ANGELES  
INTER-DEPARTMENTAL CORRESPONDENCE

0220-00540-0915

Date: October 5, 2010

To: The Mayor  
The CouncilFrom: Miguel A. Santana, City Administrative Officer *RH*Gerry F. Miller, Chief Legislative Analyst *KEL*Subject: **LOS ANGELES HOUSING DEPARTMENT REQUEST TO RELEASE THE  
2010 AFFORDABLE HOUSING TRUST FUND - ROUND 3 NOTICE OF  
FUNDING AVAILABILITY AND RELATED ACTIONS****SUMMARY**

On September 16, 2010, the Los Angeles Housing Department (LAHD) released a transmittal (Transmittal) with recommendations to release the 2010 Affordable Housing Trust Fund Notice of Funding Availability – Round 3 (Round 3 NOFA) (C.F. 09-2841). The Department identified a total of \$56.9 million as available for the Round 3 NOFA comprised of HOME Investment Partnership funds (\$8 million); Neighborhood Stabilization Program 2 (NSP-2) funds (\$35 million); Energy Efficiency and Conservation Block Grant funds (\$4.7 million); Local Housing Trust Fund Program (\$2.6 million); Community Development Block Grant (CDBG) funds (\$0.3 million); Housing Opportunities for Persons with AIDS funds (\$1 million); McKinney Bond proceeds (\$0.2 million); Los Angeles Department of Water and Power (LADWP) Sustainable Building Program funds (\$1.2 million); and LADWP Infrastructure funding for Permanent Supportive Housing (\$3.9 million). Certain restrictions, identified in the Attachment of this report, apply to the various sources. Through the Round 3 NOFA, LAHD seeks proposals for rehabilitation financing. In addition, proposals are sought for the acquisition and rehabilitation of four City-owned properties that may be developed for long-term affordable multi-family rental housing.

The proposed use of \$328,095 in CDBG funds would be derived from prior year savings. However, the CDBG Expenditure Policy and Guidelines (Policy) requires that departments refrain from spending their CDBG savings (C.F. 01-2765-S2). Such funds can only be reallocated by the Council and Mayor. Further, there have been ongoing discussions to address potential shortfalls within the City's overall CDBG budget due to lower than expected entitlement funds and program income. Therefore, we recommend that this amount be removed from the total amount of the Round 3 NOFA until this request can be evaluated along with other City CDBG-related funding priorities. This action revises the total available for the Round 3 NOFA to \$56.6 million.

The City Administrative Officer and Chief Legislative Analyst were instructed to report on these requests. We recommend approval of the LAHD requests as amended. The Findings Section of this report contains additional information relative to funding sources, requirements and proposed policy changes for the Round 3 NOFA.

The recommendations contained in this report comply with City Financial Policies because dedicated special funding sources will fully fund commitments to projects.

## **Background**

On January 27, 2010, the Council and Mayor authorized LAHD to release three rounds under the 2010 AHTF NOFA (C.F. 09-2841). The purpose of the AHTF Program is to finance the gap between the projected Total Development Cost (TDC) of a project and other available funding sources. Unlike the previous 2010 NOFA Rounds, Round 3 NOFA targets Mixed-Income, privately funded projects that have secured funds from sources other than the State of California but that are still in need of gap financing assistance from the City. The LAHD proposal to finance Mixed-Income Projects is intended to increase the supply of affordable housing within higher cost areas of the City where 100 percent affordability would be cost prohibitive. Also, within buildings that are currently subject to the City's Rent Stabilization Ordinance (RSO), units are at risk of converting to market rate once they are vacated. The Round 3 NOFA funds are available for acquisition, construction, reconstruction or rehabilitation of rental housing. This includes costs for acquisition, site improvements, conversion, demolition and relocation expenses. Funds are also available for construction and permanent financing expenses, including off-site public improvements, construction bonds, and general contractor and subcontractor payments. Ineligible activities include financing for the purpose of acquisition only or for refinancing of existing debt, reapplying for the same project using another leveraging source while an existing AHTF commitment is pending, relocation payments for persons engaging in criminal activity and payment of delinquent taxes. NSP-2 funds may not be used for permanent relocation or for retroactive reimbursement for property acquisition.

The maximum Round 3 NOFA loan award available to any one project will be \$14 million and the maximum term of any Letter of Commitment will be one year. All awards will be for a period of 30 years, with the exception of NSP-2 projects which will be 40 years. The interest rate for all Round 3 NOFA loans will be set at five percent simple interest. Payments will be derived from residual receipts of the projects. Unpaid interest will be deferred and due at maturity of the loan. The specific eligibility criteria by fund source are provided in Part I, Program Regulations, of the Round 3 NOFA.

The LAHD will report back to the Council and Mayor with final award recommendations based on the outcome of the Round 3 NOFA process, including recommendations for disposition of the City-owned properties.

## **RECOMMENDATIONS**

That the Council:

1. Approve the Third Round of the 2010 Affordable Housing Trust Fund Notice of Funding Availability (Round 3 NOFA) attached to the Los Angeles Housing

Department (LAHD) transmittal dated September 16, 2010 (C.F. 09-2841);

2. Authorize the General Manager, LAHD, or designee, to:
  - a) Issue the Round 3 NOFA based on the availability of the fund sources identified in the Attachment of this report and return for Council and Mayor approval of funding recommendations;
  - b) Seek proposals for the purchase of the following City-owned properties for the development of affordable multi-family rental housing and return for Council and Mayor approval of funding recommendations:
    - i. 2516 Eastlake Avenue and 3211-3213 1/2 Altura Walk, Los Angeles, CA 90031 (CD 1);
    - ii. 819 W. 4th Street, San Pedro, CA 90731 (CD 15);
    - iii. 851 W. 81st Street, Los Angeles, CA 90044 (CD 8); and,
    - iv. 252 S. Rampart Boulevard, Los Angeles, CA 90057 (CD 13)
  - c) Include as part of the report back on the Round 3 NOFA results a Fund Management report for the New Generation Fund in conformance with the Council and Mayor approved report requirements identified in Council File Number 08-0958. Additional information concerning this instruction is provided in the Findings Section of this report; and,
3. Instruct LAHD to not commit any Community Development Block Grant funds as part of the Round 3 NOFA until this request can be evaluated along with other City CDBG-related funding priorities.

That the Council, subject to the approval of the Mayor:

4. Authorize the General Manager, LAHD, or designee, to:
  - a) Allocate \$35 million in Neighborhood Stabilization Program 2 (NSP-2) funds for loans to eligible multi-family projects under the terms of the Round 3 NOFA and amend Contract No. C-115683 with Restore Neighborhoods Los Angeles to reduce the compensation from the NSP-2 grant by \$35 million, revising the award from this grant to \$57.2 million, to make these funds available for the Round 3 NOFA; and,
  - b) Prepare Controller instructions, and/or make any technical adjustments that may be required and are consistent with the actions taken on this item, subject to the approval of the City Administrative Officer, and instruct the Controller to implement these instructions.
5. Authorize the Controller to issue Authorities For Expenditures (AFE), upon proper written demand from the General Manager, LAHD, or designee, for the purposes of paying off lenders with first Deed of Trust associated with the disposition of LAHD's City-owned or controlled properties for the purposes of enforcing and protecting the City liens, covenants, and collateral prior to offering said properties for sale as

NSP-2 eligible affordable housing. The funding for the AFEs shall be derived from Fund No. 52J, NSP 2, Account No. F818.

### **FISCAL IMPACT STATEMENT**

There is no impact to the General Fund. Approval of these recommendations authorizes the Los Angeles Housing Department (LAHD) to release the 2010 Affordable Housing Trust Fund Notice of Funding Availability – Round 3 (Round 3 NOFA) in the amount of \$56.6 million based on the availability of previously approved HOME Investment Partnership funds (\$8 million); Neighborhood Stabilization Program 2 funds (\$35 million); Energy Efficiency and Conservation Block Grant funds (\$4.7 million); Local Housing Trust Fund Program (\$2.6 million); Housing Opportunities for Persons with AIDS funds (\$1 million); McKinney Bond proceeds (\$0.2 million); Los Angeles Department of Water and Power (LADWP) Sustainable Building Program funds (\$1.2 million); LADWP Infrastructure funding for Permanent Supportive Housing (\$3.9 million) to the extent that projects qualify for these sources. The Los Angeles Housing Department must report back to the Council and Mayor with recommendations for final award based on the results of the Round 3 NOFA. These recommendations comply with City Financial Policies because dedicated funding sources will fully fund any resulting commitments to projects selected under the Round 3 NOFA.

Attachment

## **FINDINGS**

### **1. Background**

In a transmittal dated September 16, 2010 (Transmittal), the Los Angeles Housing Department (LAHD) requested Council and Mayor authority to release the 2010 Affordable Housing Trust Fund Notice of Funding Availability – Round 3 (Round 3 NOFA) (C.F. 09-2841). The City Administrative Officer (CAO) and Chief Legislative Analyst were instructed to report on these requests.

### **2. 2010 Round 3 NOFA Highlights**

The Round 3 NOFA will fund acquisition, rehabilitation, construction and preservation of multi-family rental housing in an effort to address the needs of low and very-low income households. The proposed scoring and ranking criteria will focus on rewarding proposals that demonstrate secured leveraging sources and project sponsors that have a track record in developing projects on time and within budget.

Separate Bidder's Conferences will be conducted for different categories of funding. For the Mixed Income, NSP-2 and Sale of City-owned Properties categories, a Bidder's Conference was scheduled for September 22, 2010 with applications due on November 19, 2010. Preliminary results are expected to be determined in early December 2010. The Bidder's Conference for EECBG projects was tentatively scheduled for Wednesday, September 29, 2010 but was postponed. A new date will be determined following the approval of the Round 3 NOFA. Applications will be due on October 18, 2010. The EECBG recommendations are expected to be submitted for Council and Mayor consideration in early December 2010. The Department's recommendations on the Mixed Income, NSP-2 and Sale of City-owned Properties categories are anticipated to be submitted in mid-December 2010.

All questions will be answered online at LAHD's website and all documents related to the Round 3 NOFA may be found in the Department's website at <http://lahd.lacity.org/lahdinternet/AHTFNOFA/tabid/366/Default.aspx>.

### **3. Threshold Requirements and Scoring**

Proposals must contain all items listed on the LAHD Round 3 NOFA application checklist in order to meet the minimum threshold requirements for new construction and/or rehabilitation projects. Projects that do not meet the minimum threshold requirements will be disqualified. No additional documents shall be accepted subsequent to the application filing dates.

As with the previous two 2010 NOFAs, projects will be ranked according to the lowest ratio of calculated gap financing relative to the maximum eligible LAHD loan amount, including the following new boosts:

- Extended Affordability Covenants will receive a 5 percent boost for each 10-year increment beyond the minimum 30-year covenant. No more than 15 percent, or 60-year covenants, will be allowed. Typically, non-profit developments require

federal assistance and would be more likely to feature 55-year affordability covenants; and,

- Renovation of Historic Properties, designated as eligible for the National Register of Historic Places, are eligible to receive 10 percent boosts since such improvements tend to cost more than new construction projects.

There will also be a higher base limit for subsidy assistance for non-profit homeless assistance projects. The following five percent subsidy boosts will be continued from the previous AHTF NOFA:

- Transit Oriented Developments;
- Projects located in South Los Angeles;
- Projects achieving a Balanced Communities objective; and,
- Projects with New Generation Fund/Supportive Housing Loan Fund commitments

For most categories of funding, maximum subsidy boosts are available and may only be calculated for those units which will be restricted at or below 60 percent of the Area Median Income (AMI). For NSP-2, the AMI limit must be at or below 50 percent of the AMI.

Each application will be evaluated and scored according to the criteria established by LAHD identified in Part 5, Application Process and Requirements, of the Round 3 NOFA. Some of the major components of the selection criteria include a review of project feasibility (costs versus requested maximum subsidy needed) and architectural design review. Individual scoring formulas will vary, depending on the fund sources requested. For projects applying for EECBG funds, for instance, LAHD will select 10 proposals and five alternates. These projects will be ranked by order of anticipated energy savings. Following the outcome of an energy audit of these selected proposals, a baseline energy usage and scope of work will be determined. Projects that appear to be unable to achieve at least 20 percent energy efficiency, even with the maximum loan award, will be disqualified.

Following an appeals process, final scores and funding recommendations will be transmitted to the Mayor's Office by early December 2010. The target date for issuance of Letters of Commitment is late January 2011.

In April 2008, the City Council instructed LAHD to include a status report on the City's New Generation Fund (NGF) as part of its report on the AHTF NOFA. To date, this report has not been received. Therefore, we recommend that the LAHD's report on the Round 3 NOFA results and funding recommendations include a NGF Program Fund Management report and a status on the uses of the City Funds, including interest accrued and fees paid and/or collected, and an update of any loan defaults (C.F. 08-0958).

#### 4. Funding Resources

The LAHD identified approximately \$56.9 million in funds available for the Round 3 NOFA, to the extent that the projects meet eligibility and use requirements per fund source. These funds include budgeted HOME Investment Partnership funds (\$8 million); Neighborhood Stabilization Program 2 (NSP-2) funds (\$35 million); Energy Efficiency and Conservation Block Grant (EECBG) funds (\$4.7 million); Local Housing Trust Fund Program (LHTFP) (\$2.6 million); Community Development Block Grant (CDBG) funds (\$0.3 million); Housing Opportunities for Persons with AIDS (HOPWA) funds (\$1 million); McKinney Bond proceeds (\$0.2 million); Los Angeles Department of Water and Power (LADWP) Sustainable Building Program funds (\$1.2 million); LADWP Infrastructure funding for Permanent Supportive Housing (\$3.9 million). The Attachment to this report provides a basic description of the allowable uses for each source. The most significant new funding sources are summarized below:

- NSP-2 – American Recovery and Reinvestment Act of 2009 (ARRA) funds - \$35 million. The LAHD proposes reallocating \$35 million in NSP-2 funds to the Round 3 NOFA in order to ensure that NSP-2 grant expenditure deadlines are met in a timely manner. These funds must be expended no later than December 31, 2011. In June 2010, the Council and Mayor authorized LAHD to allocate \$92.2 million of the City's \$100 million NSP-2 grant award to augment the contract with Restore Neighborhoods Los Angeles (RNLA) for purposes of acquiring properties in bulk volume from lenders, brokers or loan servicers in order to restore foreclosed and/or abandoned residential properties to affordable homeownership and rental housing opportunities (C.F. 10-0799). In approving the use of these funds, the Department will need to reduce the contract with RNLA by \$35 million, revising the NSP-2 award to RNLA to \$57.2 million. This report includes a recommendation instructing LAHD to amend the contract with RNLA accordingly. No project will be adversely impacted by this action.
- EECBG – ARRA funds - \$4.7 million. These funds will be used to support the Affordable Housing Multifamily Retrofit Program which aims to improve the energy and water efficiency in eligible housing developments by between 20 to 40 percent. The maximum per project loan award is \$500,000. The Department received a \$4.9 million allocation from the City's \$35 million EECBG grant award (C.F. 09-0648-S15). The EECBG funds must be obligated (with a Letter of Commitment) by mid January 2011. Other critical fund deadlines are noted on page four of the Transmittal. Additional EECBG funding requirements are provided in the Round 3 NOFA.
- Local Housing Trust Fund Program (LHTFP) - \$2.6 million. The LHTFP funds will be used to finance permanent supportive housing programs to serve persons with extremely low incomes. Of the proposed \$2.6 million in LHTFP funds, \$650,000 will be derived from the LHTFP grant and \$2.0 million will be derived from General Funds that were previously allocated to the City's Affordable Housing Trust Fund in 2008-09 for purposes of providing a match (C.F. 08-0600).

In September 2010, the Council and Mayor authorized LAHD to execute Grant Agreements with the California Housing and Community Development (State HCD) for purposes of accepting \$1.8 million comprising three Building Equity and Growth in Neighborhoods Program grants (C.F. 10-2328). At the time, LAHD also sought authority to execute a Grant Agreement with the State HCD for purposes of accepting a \$2 million grant award of LHTFP funds. However, the Department had not yet received the LHTFP Grant Agreement, although it was expected to be issued shortly. The CAO, with assistance from the LAHD, was instructed to report to the Council and Mayor immediately upon receipt of the Grant Agreement and to provide the documents and implementing recommendations needed to proceed with the grant acceptance process. On September 27, 2010, LAHD received the LHTFP from the State HCD. The CAO will work with LAHD to transmit the necessary documents for review by the Council and Mayor under a separate cover.

It should be noted that the LAHD-proposed Round 3 NOFA includes \$328,095 in unspent 2009-10 (Program Year 36) CDBG funds that were originally allocated for the purpose of supporting AHTF operations. These funds are considered among the most flexible of the available Round 3 NOFA sources. However, the CDBG Expenditure Policy and Guidelines (Policy) requires that City Departments refrain from spending or programming their CDBG savings (C.F. 01-2765-S2). The Policy further stipulates that "all savings identified will be appropriated during reprogramming or as directed by the Council and Mayor." Annual reprogrammings, as well as interim Council and Mayor reprogrammings, provide an opportunity to evaluate, rank and allocate funds to priority projects. Therefore, it is recommended that no CDBG funds be committed through the Round 3 NOFA until this request is evaluated along with other City CDBG-related priorities. Also, in consideration of ongoing discussions to address potential shortfalls within the City's overall CDBG budget, which was last estimated to be \$3.8 million (due to lower than expected entitlement funds and program income) any identified CDBG savings may be needed to mitigate current and future year needs (C.F. 09-2665).

## 5. Sale of Real Estate Owned Properties

Through the Round 3 NOFA, LAHD is seeking proposals for the acquisition and rehabilitation of the four Real Estate Owned (REO) properties listed below.

Property Address	CD	Types*	No. Units	Year Acquired	LAHD Acquisition Cost	Approx. Estimated Construction Cost	NSP Eligible?
2516 Eastlake Avenue and 3211-3213 1/2 Altura Walk	1	SFR/ MFR	5	1995	\$462,684	\$385,000	NSP-1
819 W. 4th Street	15	MFR	10	2006	70,158	801,000	NSP-1
851 W. 81st Street	8	MFR	8	2009	673,117	492,000	NSP-1 and -2
252 S. Rampart Blvd.	13	SFR	1	2010	129,045	365,000	NSP-1
<b>Totals</b>			<b>24</b>		<b>\$1,335,004</b>	<b>\$2,043,000</b>	

\* Types: SFR = Single Family Residence; MFR = Multi-Family Residence



An REO property is owned or controlled by LAHD as a result of foreclosure or forfeiture. In assuming ownership or control of such properties, LAHD becomes responsible for maintaining the existing affordability and habitability requirements until a new owner or developer can be identified to ensure that affordable housing is maintained. As of March 2010, LAHD claimed ownership of 10 REO properties with a combined 143 units plus one vacant site. Since any additional expenses are most likely unrecoverable, it is in the City's interest to dispose of and ensure the rehabilitation of REO properties by responsible parties. For this reason, in May 2010, the Council and Mayor approved a policy requiring the disposition and rehabilitation of REO properties under LAHD ownership or control within five years of assuming ownership or control (C.F. 99-1272 and C.F. 10-0294). The Department will continue to seek authority to dispose of the remaining REO properties as soon as the necessary due diligence can be completed.

Upon Council and Mayor approval of the Round 3 NOFA results, the selected applicants will enter into Exclusive Right to Negotiate Agreements leading to Disposition and Development Agreements. The Department reports that LAHD funding assistance through NSP-1 and 2, in addition to the Round 3 NOFA, may be available to rehabilitate these sites. Detailed appraisal information, preliminary title reports and rehabilitation work descriptions are included in the Round 3 NOFA as exhibits COP1 through COP3.

## **6. Policy Considerations**

Establishment of Recruitment Radius. In March 2010, LAHD was instructed to report relative to its efforts to establish a recruitment radius for AHTF-financed housing, specifically to provide residents of communities where new housing is being built the first opportunity to access such housing. As part of the 2010 Round 2 NOFA, LAHD reported that the State of California's HOME Program Regulations state that the City cannot give preference to tenants based on residency except where accompanied by an equal preference for employment in the local area and applied to areas not smaller than municipal jurisdictions. Attachments 2 and 3 of the Transmittal include the applicable sections of the Program Regulations.

When LAHD reported on this matter, the Department proposed amending the AHTF Affirmative Marketing Plan to include a requirement that developers perform increased local outreach efforts in Round 3 NOFA (C.F. 09-2841). As such, the Department included a requirement in the NOFA that developers perform increased local outreach efforts by advertising upcoming leasing opportunities in various spaces such as, but not limited to, faith-based organizations, post offices, and markets within a certain radius of the development. LAHD's Occupancy Monitoring Unit will review the submittals to ensure compliance with the new requirement.

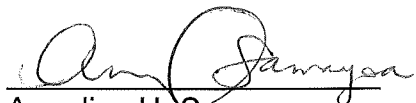
## **7. Habitat for Humanity**

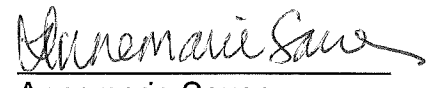
The Housing, Community and Economic Development Committee considered the LAHD's Transmittal on September 22, 2010. At that time, the Department was asked about the feasibility of collaborating with Habitat for Humanity (Habitat). The Department indicated they had a meeting scheduled with Habitat and would report

back. As of the preparation of this report, the Department had not responded regarding whether Habitat performs rehabilitation work and potential future collaborative opportunities, either through the AHTF NOFA or other LAHD initiatives.

**8. Foreclosure Prevention and Homeownership**

The LAHD was instructed to report relative to the possible use of the Community Redevelopment Agency's contribution of low- and moderate-income housing funds to the AHTF for homeownership programs, specifically the Council District Seven Foreclosure Prevention Program (Program). Due to income restrictions on the Agency's low- and moderate-income housing funds, it was determined that many families would not meet the eligibility requirements of this funding source. Ultimately, one million dollars in Assembly Bill (AB) 1290 funds from Council District 7, which are less restrictive, were used to fund this pilot Program (C.F. 09-0185).

  
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Los Angeles Housing Department (LAHD)  
**2010 Affordable Housing Trust Fund (AHTF) - Round 3**  
**Notice of Funding Availability (NOFA) Funding Resources \***

Source	Amount	Description of Eligible Uses
HOME Investment Partnership	\$ 8 million	Funds are available for the development of privately funded mixed-income projects. Such projects would have secured funding from sources other than the State, but still require gap financing.
Neighborhood Stabilization Program 2 (NSP 2) – ARRA*	35 million	Projects must be located within an NSP 2-eligible target area. (Visit <a href="http://lahd.lacity.org/nsp">http://lahd.lacity.org/nsp</a> for map.) Project units must be occupied by households with incomes at or below 50% AMI. Up to \$10 million of these funds can be used for developments on non-foreclosed vacant properties. NSP 2 funds awarded through this NOFA must be expended no later than December 31, 2011.
Energy Efficiency and Conservation Block Grant (EECBG) – ARRA*	4.7 million	For existing multi-family affordable rental properties with existing or proposed affordability covenants of at least 30 years, and that propose achieving 20 to 40 percent improved energy efficiency. Eligible projects fully restrict occupancy to households with incomes less than 60 percent of the Area Median Income. Maximum per project award is \$500,000.
Local Housing Trust Fund Program (LHTFP)	2.6 million (\$2 million AHTF match + \$650,000 LHTFP)	These funds will be used for permanent supportive rental housing programs for persons and families of extremely low-incomes.
Housing Opportunities for Person with AIDS (HOPWA)	1 million	Funds are available to allow for specific units in housing developments to be reserved for homeless or very-low income persons living with HIV/AIDS.
McKinney Bond Funds	0.2 million	These funds are derived from proceeds from savings generated through the refunding of bonds that are split between the City and the U.S. Department of Housing and Urban Development HUD pursuant to the provisions of McKinney Act. Funds are typically used to support improvements at supportive housing projects.
L.A. Department of Water and Power (LADWP) Sustainable Building Program	1.2 million	These funds are provided in the form of a loan to encourage energy conservation within affordable multifamily housing units. To be eligible for funding, project must exceed Title 24 Energy Standards or increase existing energy efficiency. Projects may receive up to \$200,000 each. These funds were set aside in 2009-10 (\$285,000) and 2010-11 (\$1 million). Proposals will be reviewed jointly, by LAHD and LADWP, to determine eligibility.
LADWP Infrastructure funding for Permanent Supportive Housing	3.9 million	These funds serve as a contribution in aid of construction for costs associated with energy facilities for which the LADWP charges customers fees. These funds were set aside in 2005-06. Proposals will be reviewed jointly, by LAHD and LADWP, to determine eligibility.
<b>Total</b>	<b>\$56.6 million</b>	

\* ARRA = American Recovery and Reinvestment Act of 2009 funds. Additional sources of funds may become available for the Round 3 NOFA, such as Community Development Block Grant funds, subject to future Mayor and Council actions. All Round 3 NOFA documents may be found in the Department's website at <http://lahd.lacity.org/lahdinternet/AHTFNOFA/tabid/366/Default.aspx>.