



REGULAR MEETING AGENDA
July 15, 2021 at 2:00 pm

Pursuant to Governor Newsom's Executive Order, Commissioners of the California Statewide Communities Development Authority or staff may participate in this meeting via a teleconference. In the interest of maintaining appropriate social distancing, members of the public may participate in the meeting telephonically. Members of the public may observe and offer comment at this meeting telephonically by dialing 623-404-9000, Meeting ID 240 338 9861 Passcode 747188. If you are an individual with a disability and need a reasonable modification or accommodation pursuant to the Americans with Disabilities Act ("ADA") please contact info@cscda.org or 1-800-531-7476 prior to the meeting for assistance.

A. OPENING AND PROCEDURAL ITEMS

1. Roll Call.

_____ Kevin O'Rourke, Chair	_____ Brian Stiger, Member
_____ Tim Snellings, Vice Chair	_____ Marcia Raines, Member
_____ Brian Moura, Secretary	_____ Niroop Srivatsa, Alt. Member
_____ Jordan Kaufman, Treasurer	
_____ Dan Mierzwa, Member	
2. Consideration of the Minutes of the July 1, 2021 Regular Meeting.
3. Consent Calendar.
4. Public Comment.

B. ITEMS FOR CONSIDERATION AND ACTION

5. Consider Resolution to Amend the Appropriations Limit and the Authorization to Incur Bonded Indebtedness for Improvement Area No. 2 Established in and for California Statewide Communities Development Authority Community Facilities District No. 2016-02 (Delta Coves), County of Contra Costa, State of California and Related Matters.

6. Consider the following resolutions to initiate proceedings to form Community Facilities District No. 2021-02 (Citro), County of San Diego:
 - a. A resolution approving a joint community facilities agreements and acquisition agreements and declaring intention to establish California Statewide Communities Development Authority Community Facilities District No. 2021-02 (Citro), County of San Diego, State of California and to levy special taxes therein to finance certain public improvements and certain development impact fees.
 - b. A resolution to incur bonded indebtedness to finance certain public improvements and certain development impact fees within California Statewide Communities Development Authority Community Facilities District No. 2021-02 (Citro), County of San Diego, State of California and calling for a public hearing.
7. Consideration of lender consent policy for commercial PACE.
8. Consideration of PACE policy related to state and federal securities laws.
9. Closed Session
 - a. CONFERENCE WITH LEGAL COUNSEL - EXISTING LITIGATION (Paragraph (1) of subdivision (d) of Section 54956.9) Name of Case: Verity Health System of California, Inc., et al. Chapter 11, Bankruptcy Case No. 2:18-bk-20151-ER; Verity Health System of California, Inc. v. California Statewide Communities Development Corporation dba CSCDA, Adversary Number 20:20-ap-01234-ER

C. STAFF ANNOUNCEMENTS, REPORTS ON ACTIVITIES OR REQUESTS

10. Executive Director Update.
11. Staff Updates.
12. Adjourn.

NEXT MEETING: Thursday, August 5, 2021 at 2:00 p.m.

CALIFORNIA STATEWIDE COMMUNITIES DEVELOPMENT AUTHORITY

CONSENT CALENDAR

1. Inducement of Fiddymment Affordable Partners, L.P. (Hayden Parkway Apartments), City of Roseville, County of Placer; issue up to \$28 million in multi-family housing revenue bonds.
2. Consider and approve the levy of special taxes for fiscal year 2021-2022 for the following:
 - (i) Community Facilities District No. 2012-01 (Fancher Creek) Improvement Area Nos. 1 & 3;
 - (ii) Community Facilities District No. 2007-01 (Orinda Wilder Project);
 - (iii) Community Facilities District No. 2018-03 (Uptown Newport);
 - (iv) Community Facilities District No. 2016-02 (Delta Coves) Improvement Area Nos. 1 & 2;
 - (v) Community Facilities District No. 2015-01 (University District) Improvement Area Nos. 1 & 2;
 - (vi) Community Facilities District No. 2016-01 (Napa Pipe);
 - (vii) Community Facilities District No. 2019-01 (333 North Prairie);
 - (viii) Community Facilities District No. 2020-01 (Sand Creek).

July 15, 2021



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MINUTES

REGULAR MEETING AGENDA July 1, 2021 at 2:00 pm

Commission Vice Chair Tim Snellings called the meeting to order at 2:07 pm.

1. Roll Call.

Commission members participating via teleconference: Tim Snellings, Brian Moura, Jordan Kaufman, Dan Mierzwa, and Marcia Raines.

Others participating via teleconference: Cathy Barna, CSCDA Executive Director; James Hamill, Bridge Strategic Partners; Jon Penkower, Bridge Strategic Partners; Sandy Young, CSAC Finance Corporation; and Tricia Ortiz, Richards Watson & Gershon.

2. Consideration of the Minutes of June 17, 2021 Regular Meeting and Special Meetings.

The Commission approved the June 17, 2021 Regular Meeting and Special Meetings minutes.

Motion to approve by D. Mierzwa. Second by J. Kaufman. Unanimously approved by roll-call vote. B. Moura did not vote.

3. Consideration of the Consent Calendar.

The Commission approved the Consent Calendar.

1. Consideration of agreements with DTA Finance for PACE assessment administration for CastleGreen and Bayview Asset Management.
2. Consider a resolution authorizing certain designees of CSCDA to declare official intent to reimburse certain expenditures from proceeds of indebtedness in accordance with Section 1.150-2 of the Treasury Regulations in connection with future proposed issuances of revenue bonds of CSCDA

Motion to approve by J. Kaufman. Second by M. Raines. Unanimously approved by roll-call vote. B. Moura did not vote.

4. Public Comment.

There was no public comment.

5. Consideration of the issuance of revenue bonds or other obligations to finance or refinance the following projects, the execution and delivery of related documents, and other related actions:

- a. HPD Oroville LP, (Oroville Apartments), City of Oroville, County of Butte; issue up to \$7,500,000 in multi-family housing revenue bonds.

Executive Director Barna gave an overview of the project, and the financing complies with CSCDA's general and issuance policies for unrated debt. The project is an acquisition and rehabilitation of 62 units of rental housing. 100% of the units will remain rent restricted for low-income residents. CSCDA has financed more than 10 prior Highland projects. CSCDA's Executive Director recommended that the Commission adopt the resolution.

Motion to approve by D. Mierzwa. Second by J. Kaufman. Unanimously approved by roll-call vote. B. Moura did not vote.

- b. HPD OM LP, (Oroville Manor Apartments), City of Oroville, County of Butte; issue up to \$7,500,000 in multi-family housing revenue bonds.

Executive Director Barna gave an overview of the project, and the financing complies with CSCDA's general and issuance policies for unrated debt. The project is an acquisition and rehabilitation of 72 units of rental housing. 100% of the units will remain rent restricted for low-income senior residents. CSCDA has financed more than 10 prior Highland projects. CSCDA's Executive Director recommended that the Commission adopt the resolution.

Motion to approve by M. Raines. Second by D. Mierzwa. Unanimously approved by roll-call vote. B. Moura did not vote.

- c. HPD S-E LP, (Spring & Encino Apartments), City of Brawley, County of Imperial, issue up to \$11,000,000 in multi-family housing revenue bonds.

Executive Director Barna gave an overview of the project, and the financing complies with CSCDA's general and issuance policies for unrated debt. The project is an acquisition and rehabilitation of 96 units of rental housing. 100% of the units will remain rent restricted for low-income residents. CSCDA has financed more than 10 prior Highland projects. CSCDA's Executive Director recommended that the Commission adopt the resolution.

Motion to approve by J. Kaufman. Second by D. Mierzwa. Unanimously approved by roll-call vote.

- d. HPD Willows LP, (Willow Oaks Apartments), City of Willows, County of Glenn, issue up to \$8,000,000 in multi-family housing revenue bonds.

Executive Director Barna gave an overview of the project, and the financing complies with CSCDA's general and issuance policies for unrated debt. The project is an acquisition and rehabilitation of 60 units of rental housing. 100% of the units will remain rent restricted for low-income residents. CSCDA has financed more than 10 prior Highland projects. CSCDA's Executive Director recommended that the Commission adopt the resolution.

Motion to approve by D. Mierzwa. Second by M. Raines. Unanimously approved by roll-call vote.

6. Conduct second reading of and adopt “Ordinance Levying a Special Tax for Fiscal Year 2021-2022 and Following Fiscal Years Solely Within and Relating to Improvement Area No. 2 of the California Statewide Communities Development Authority Community Facilities District No. 2020-02 (Atwell), City of Banning, County of Riverside, State of California”.

Motion to approve by B. Moura. Second by D Mierzwa. Unanimously approved by roll-call vote

7. Consideration of 2021-22 CSCDA Budget.

CSCDA’s Executive Director Barna gave an overview of the proposed budget, which is a compilation of projections compiled by the Executive Director, CSCDA Staff with accounting help provided by the League of California Cities. Board Member Mierzwa suggested that staff utilize CalTRUST for the funds in the investment income. CSCDA’s Executive Director recommended approval of the 2021-22 budget.

Motion to approve by D. Mierzwa. Second by J. Kaufman. Unanimously approved by roll-call vote

8. Consideration of CSCDA Pension Obligation Bond Guidance.

CSCDA’s Executive Director recommended that the Commission adopt the POB Policy and direct staff to obtain permission from various organizations that have prepared materials about POBs and upon receipt of permission, host links to the materials on the CSCDA website.

Motion to approve by B. Moura. Second by J. Kaufman. Unanimously approved by roll-call vote

9. Consideration of resolution amending the CSCDA regular meeting schedule.

CSCDA’s Executive Director asked the Board to approve the resolution authorizing CSCDA to hold regular meetings on any Thursday at 2:00 PM within the proper noticing requirements under the Brown Act.

Motion to approve by M. Raines. Second by D. Mierzwa. Unanimously approved by roll-call vote

10. Executive Director Update.

Executive Director Barna had no update

11. Staff Update.

Staff had no update.

12. Adjourn.

The meeting was adjourned at 2:39 p.m.

Submitted by: Sendy Young, CSAC Finance Corporation

NEXT MEETING: Thursday, July 15, 2021 at 2:00 p.m.

RESOLUTION NO. 21H-__

**A RESOLUTION OF THE CALIFORNIA STATEWIDE
COMMUNITIES DEVELOPMENT AUTHORITY SETTING
FORTH THE AUTHORITY'S OFFICIAL INTENT TO ISSUE
MULTIFAMILY HOUSING REVENUE BONDS TO UNDERTAKE
THE FINANCING OF VARIOUS MULTIFAMILY RENTAL
HOUSING PROJECTS AND RELATED ACTIONS**

WHEREAS, the Authority is authorized and empowered by the Title 1, Division 7, Chapter 5 of the California Government Code to issue mortgage revenue bonds pursuant to Part 5 (commencing with Section 52000) of the California Health and Safety Code (the "Act"), for the purpose of financing multifamily rental housing projects; and

WHEREAS, the borrowers identified in Exhibit A hereto and/or related entities (collectively, the "Borrowers") have requested that the Authority issue and sell multifamily housing revenue bonds (the "Bonds") pursuant to the Act for the purpose of financing the acquisition and rehabilitation or construction as set forth in Exhibit A, of certain multifamily rental housing developments identified in Exhibit A hereto (collectively, the "Projects"); and

WHEREAS, the Authority, in the course of assisting the Borrowers in financing the Projects, expects that the Borrowers have paid or may pay certain expenditures (the "Reimbursement Expenditures") in connection with the Projects within 60 days prior to the adoption of this Resolution and prior to the issuance of the Bonds for the purpose of financing costs associated with the Projects on a long-term basis; and

WHEREAS, Section 1.103-8(a)(5) and Section 1.150-2 of the Treasury Regulations require the Authority to declare its reasonable official intent to reimburse prior expenditures for the Projects with proceeds of a subsequent tax-exempt borrowing; and

WHEREAS, the Authority wishes to declare its intention to authorize the issuance of Bonds for the purpose of financing costs of the Projects (including reimbursement of the Reimbursement Expenditures, when so requested by the Borrower upon such terms and condition as may then be agreed upon by the Authority, the Borrower and the purchaser of the Bonds) in an aggregate principal amount not to exceed the amount with respect to each Project set forth in Exhibit A; and

WHEREAS, Section 146 of the Internal Revenue Code of 1986 limits the amount of multifamily housing mortgage revenue bonds that may be issued on behalf of for-profit borrowers in any calendar year by entities within a state and authorizes the governor or the legislature of a state to provide the method of allocation within the state; and

WHEREAS, Chapter 11.8 of Division 1 of Title 2 of the California Government Code governs the allocation of the state ceiling among governmental units in the State of California having the authority to issue private activity bonds; and

WHEREAS, Section 8869.85 of the California Government Code requires a local agency desiring an allocation of the state ceiling to file an application with the California Debt Limit Allocation Committee (the "Committee") for such allocation, and the Committee has certain policies that are to be satisfied in connection with any such application;

NOW, THEREFORE, BE IT RESOLVED by the Commission of the Authority as follows:

Section 1. The above recitals, and each of them, are true and correct.

Section 2. The Authority hereby determines that it is necessary and desirable to provide financing for the Projects (including reimbursement of the Reimbursement Expenditures) by the issuance and sale of Bonds pursuant to the Act, as shall be authorized by resolution of the Authority at a meeting to be held for such purpose, in aggregate principal amounts not to exceed the amounts set forth in Exhibit A. This action is taken expressly for the purpose of inducing the Borrowers to undertake the Projects, and nothing contained herein shall be construed to signify that the Projects comply with the planning, zoning, subdivision and building laws and ordinances applicable thereto or to suggest that the Authority or any program participant, officer or agent of the Authority will grant any such approval, consent or permit that may be required in connection with the acquisition and construction or rehabilitation of the Projects, or that the Authority will make any expenditures, incur any indebtedness, or proceed with the financing of the Project.

Section 3. This resolution is being adopted by the Authority for purposes of establishing compliance with the requirements of Section 1.103-8(a)(5) and Section 1.150-2 of the Treasury Regulations. In such regard, the Authority hereby declares its official intent to use proceeds of indebtedness to reimburse the Reimbursement Expenditures.

Section 4. The officers and/or the program managers of the Authority are hereby authorized and directed to apply to the Committee for an allocation from the state ceiling of private activity bonds to be issued by the Authority for each of the Projects in an amount not to exceed the amounts set forth in Exhibit A, and to take any and all other actions as may be necessary or appropriate in connection with such application, including but not limited to the payment of fees, the posting of deposits and the provision of certificates, and any such actions heretofore taken by such officers and program managers are hereby ratified, approved and confirmed.

PASSED AND ADOPTED by the California Statewide Communities Development Authority this July 15, 2021.

The undersigned, an Authorized Signatory of the California Statewide Communities Development Authority, DOES HEREBY CERTIFY that the foregoing resolution was duly adopted by the Commission of said Authority at a duly called meeting of the Commission of said Authority held in accordance with law on July 15, 2021.

By: _____
Authorized Signatory

EXHIBIT A

Project Name	Project Location	Project Description (units)	New Construction/ Acquisition and Rehabilitation	Legal Name of initial owner/operator	Bond Amount
Hayden Parkway Apartments	City of Roseville, County of Placer	94	New Construction	Fiddymment Affordable Partners, L.P.	\$28,000,000



Agenda Item No. 3

Agenda Report

DATE: July 15, 2021
TO: CSCDA COMMISSIONERS
FROM: Cathy Barna, Executive Director
PURPOSE: Consent Calendar

SUMMARY:

2. Consider and approve the levy of special taxes for fiscal year 2021-2022 for the following:

- (i) Community Facilities District No. 2012-01 (Fancher Creek) Improvement Area Nos. 1 & 3;
- (ii) Community Facilities District No. 2007-01 (Orinda Wilder Project);
- (iii) Community Facilities District No. 2018-03 (Uptown Newport);
- (iv) Community Facilities District No. 2016-02 (Delta Coves) Improvement Area Nos. 1 & 2;
- (v) Community Facilities District No. 2015-01 (University District) Improvement Area Nos. 1 & 2;
- (vi) Community Facilities District No. 2016-01 (Napa Pipe);
- (vii) Community Facilities District No. 2019-01 (333 North Prairie);
- (viii) Community Facilities District No. 2020-01 (Sand Creek).

There are various annual reporting requirements with different reporting dates related to the California Statewide Communities Development Authority Community Facilities Districts Nos. 2012-01 (Fancher Creek), 2007-01 (Orinda Wilder Project), 2018-03 (Uptown Newport), 2016-02 (Delta Coves), 2015-01 (University District), 2016-01 (Napa Pipe), 2019-01 (333 North Prairie), and 2020-01 (Sand Creek). The requirements include, among other things, the presentation of the "Annual Special Tax Roll" for CFD No. 2012-01, CFD No. 2007-01, CFD 2018-03, CFD 2016-02, CFD 2015-01, CFD No. 2016-01, CFD No. 2019-01, and CFD No. 2020-01 respectively, to the Commission for consideration. The annual levy is necessary to pay debt service on the outstanding bonds and to pay for certain public services.

The special taxes being levied hereunder are at the same rate or at a lower rate than provided within each applicable Ordinance.

Documents: <https://www.dropbox.com/sh/gcm837dbenfzn5g/AACdTsROgMsIeKmcBVYDRqdIa?dl=0>



Agenda Item No. 5

Agenda Report

DATE: July 15, 2021

TO: CSCDA COMMISSIONERS

FROM: Cathy Barna, Executive Director

PURPOSE: Consider Resolution to Amend the Appropriations Limit and the Authorization to Incur Bonded Indebtedness for Improvement Area No. 2 Established in and for California Statewide Communities Development Authority Community Facilities District No. 2016-02 (Delta Coves), County of Contra Costa, State of California and Related Matters.

SUMMARY:

CSCDA issued community facilities district (CFD) bonds for Delta Coves located in eastern Contra Costa County in 2016, 2018 and 2020. SDC Delta Coves, LLC (“Developer”) is the master developer of the property within the CFD which includes Improvement Area No. 1 (“IA 1”) and Improvement Area No. 2 (“IA 2”).

The CFD boundary map identifying the boundaries and parcels within IA 1 and IA 2 is attached for reference. (Attachment A)

At the time the CFD was formed, the property identified on the boundary map as Parcel C and Parcel D (“Property”) was planned to be used as a marina and not expected to include any homes or developed property.

The bond authorization for IA 2 was established assuming a total of only 66 units on Parcel B and Parcel E within IA 2 at buildout. Developer is currently in the process of entitling the Property to include residential units which will significantly increase the ultimate unit count within IA 2.

Based on the three series of bonds that have been issued for the CFD, the original IA 2 bond authorization of \$7 million has only \$4,480,000 remaining. The estimated bonding capacity for the revised development plan is almost \$9 million resulting in a potential loss of net funding for facilities of approximately \$4 million. The Developer requesting an amendment to the appropriations limit, and authorization to increase the bonded indebtedness from \$7 million to \$13 million.

There has been no change in (1) the rate and method of apportionment of the special tax for the CFD, (2) the Improvements and Fees authorized to be financed by the CFD, and (3) the name of the CFD since its formation, nor is any contemplated here.

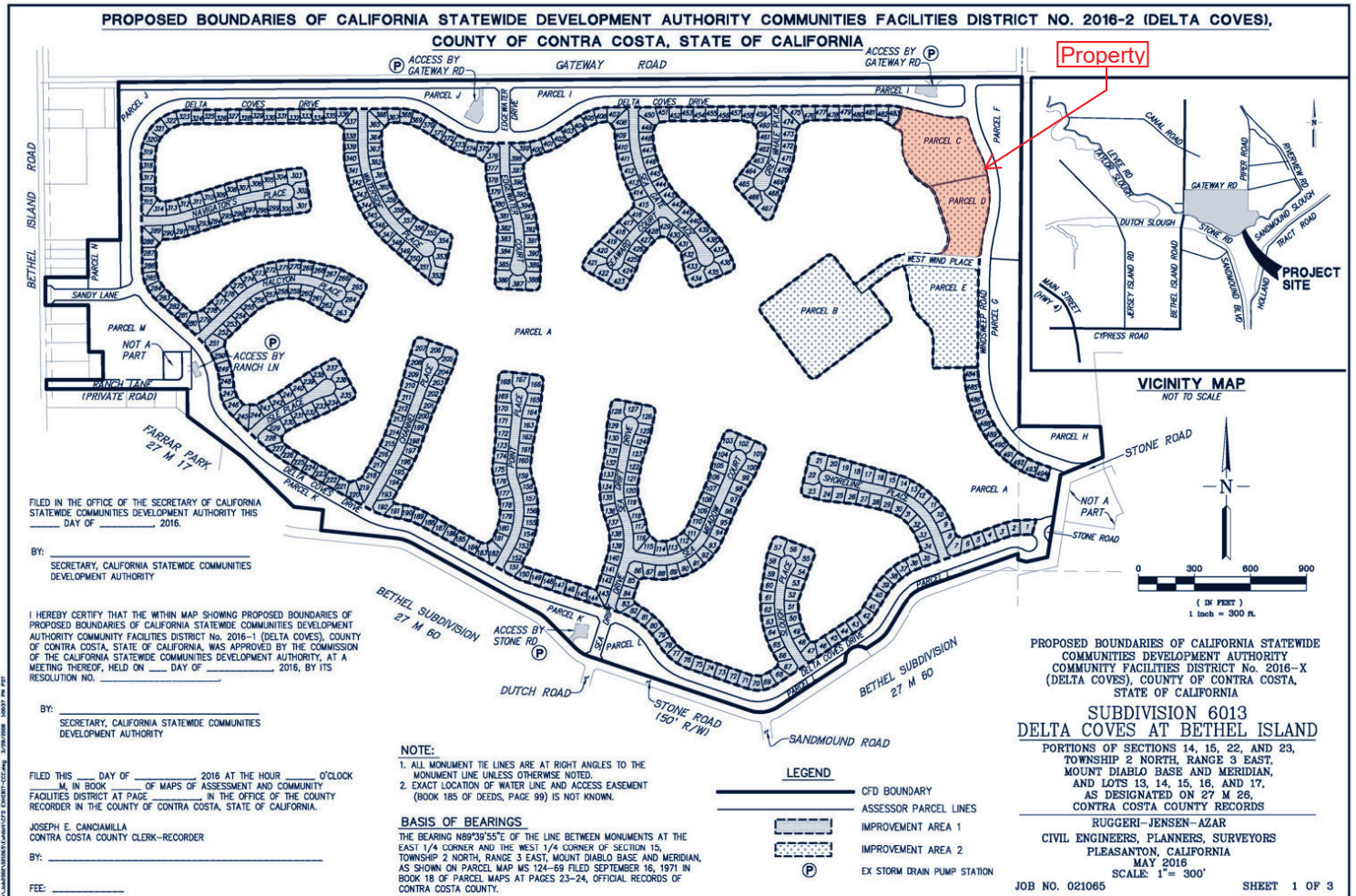
EXECUTIVE DIRECTOR RECOMMENDATION:

Approve the resolution and set the public hearing for September 2, 2021.

Resolution: <https://www.dropbox.com/sh/akfdgqsd0luzyqh/AAD0hvJIbobYsIKDXx3PgALja?dl=0>

ATTACHMENT A

**Boundary Map of CSCDA CFD No. 2016-02 (Delta Coves),
County of Contra Costa, State of California**





Agenda Item No. 6

Agenda Report

DATE: July 15, 2021

TO: CSCDA COMMISSIONERS

FROM: Cathy Barna, Executive Director

PROJECT: Citro (San Diego County)– Community Facilities District

PURPOSE: Consider the following resolutions to initiate proceedings to form Community Facilities District No. 2021-02 (Citro), County of San Diego:

- a. A resolution approving a joint community facilities agreements and acquisition agreements and declaring intention to establish California Statewide Communities Development Authority Community Facilities District No. 2021-02 (Citro), County of San Diego, State of California and to levy special taxes therein to finance certain public improvements and certain development impact fees.
- b. A resolution to incur bonded indebtedness to finance certain public improvements and certain development impact fees within California Statewide Communities Development Authority Community Facilities District No. 2021-02 (Citro), County of San Diego, State of California and calling for a public hearing.

EXECUTIVE SUMMARY:

The action requested today is the initial step in the formation of the Citro Community Facilities District (CFD) located in the County of San Diego, California (the “County”). The CFD is being formed to finance public facilities and fees for the County and the Rainbow Municipal Water District. The County unanimously approved the formation of the CFD by CSCDA on March 17, 2021. The Rainbow Municipal Water District also approved the CFD formation by CSCDA on October 27, 2020.

BACKGROUND:

The proposed CFD will be formed to fund water and sewer connection fees, water and sewer onsite and offsite infrastructure costs, and costs associated with the relocation of SDG&E overhead utilities, all associated with the Citro residential development by tri pointe Homes in North San Diego County, adjacent to I-15.

Property within this proposed CFD will encompass approximately 844 residential units, including townhomes, paired homes, and single-family homes.

The financing is estimated to not exceed \$55,000,000 and will be brought back to the Commission for completion of the formation of the CFD, and for final approval of the bond issuance. Bonds will likely be issued in Q1 2022.

COMMISSION ACTION RECOMMENDED BY THE EXECUTIVE DIRECTOR:

CSCDA's Executive Director recommends approving the following resolutions:

1. A resolution approving a joint community facilities agreements and acquisition agreements and declaring intention to establish California Statewide Communities Development Authority Community Facilities District No. 2021-02 (Citro), County of San Diego, State of California and to levy special taxes therein to finance certain public improvements and certain development impact fees.
2. A resolution to incur bonded indebtedness to finance certain public improvements and certain development impact fees within California Statewide Communities Development Authority Community Facilities District No. 2021-02 (Citro), County of San Diego, State of California and calling for a public hearing on September 2, 2021.

Documents: <https://www.dropbox.com/sh/94olpq60b8rhn3/AADZCPzS4E9a7fmxepCdkFHQa?dl=0>



Agenda Item No. 8

Agenda Report

DATE: July 15, 2021

TO: CSCDA COMMISSIONERS

FROM: Cathy Barna, Executive Director

PURPOSE: Consideration of lender consent policy for commercial PACE

EXECUTIVE SUMMARY:

Under the current requirements of the CSCDA Open PACE commercial program lender consent by a mortgage holder is required at the discretion of the property owner and administrator. Some mortgage documents include provisions that the placement of a voluntary loan that is in a senior position to its loan triggers a default of the loan. PACE is senior to any mortgage on a property. The PACE statutes are silent as to the requirement of lender consent, leaving it to CSCDA to make the determination of such requirement.

ANALYSIS:

The volume of commercial PACE transactions has steadily increased over the past two years. As a matter of public policy, CSCDA should not knowingly violate mortgage documents even if a property owner and/or administrator are willing to take the risk. In addition, other state commercial PACE programs including Texas, Florida, Connecticut, Colorado and Wisconsin all require lender consent for the above referenced reasons. Therefore, establishing a policy requiring lender consent for commercial PACE projects will maintain the integrity of the program and CSCDA.

The Economic, Innovation and Sustainability Committee have reviewed and recommend approval of the policy.

EXECUTIVE DIRECTOR RECOMMENDED ACTION:

The Executive Director recommends that lender consent be required for all commercial PACE financings effective August 1, 2021.



Agenda Item No. 7

Agenda Report

DATE: July 15, 2021

TO: CSCDA COMMISSIONERS

FROM: Cathy Barna, Executive Director

PURPOSE: Consideration of PACE policy related to state and federal securities laws

EXECUTIVE SUMMARY:

In consultation with CSCDA's PACE counsels including Orrick, Herrington & Sutcliffe; Jones Hall; and Stradling, Yocca, Carlson & Rauth, it is recommended that the Commission add a policy relating to PACE financings and state and federal securities laws. This is to ensure that if a program administrator is not an initial purchaser of the PACE bonds, they have complied with all securities laws.

ANALYSIS:

The above-referenced PACE counsels drafted the following policy for consideration. The policy was reviewed and approved by the Economic, Innovation and Sustainability Committee as Section VI. of CSCDA's Issuance/Financing Policy.

VI. PACE FINANCINGS

In general, the initial purchasers of PACE bonds should be the applicable program administrator or an affiliate of the applicable program administrator. In those financings where that is not the case, the applicable program administrator will ensure that it has complied with state and federal securities laws and provide acceptable representations to CSCDA. For purposes of this Section VI, "affiliate" means any entity or person that directly, or indirectly through one or more intermediaries, owns, is owned by or is under common ownership with the applicable program administrator, in whole or in part, and any entity or person that directly, or indirectly through one or more intermediaries, controls, is controlled by or is under common control with the applicable program administrator by contract or otherwise.

EXECUTIVE DIRECTOR'S RECOMMENDED ACTION:

The Executive Director recommends approve of the above-referenced PACE policy, and such policy be added to the CSCDA website.