PHILADELPHIA HOUSING AUTHORITY

MOVING TO WORK ANNUAL PLAN
FISCAL YEAR 2016
(APRIL 1, 2015 TO MARCH 31, 2016)

FIRST SUBMISSION TO HUD ON JANUARY 13, 2015
SECOND SUBMISSION TO HUD ON APRIL 17, 2015
THIRD SUBMISSION TO HUD ON SEPTEMBER 11, 2015
FOURTH SUBMISSION TO HUD ON SEPTEMBER 16, 2015
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RAD SIGNIFICANT AMENDMENT #1 SUBMITTED TO HUD ON JANUARY 14, 2016
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RAD SIGNIFICANT AMENDMENT #2 SUBMITTED TO HUD ON MARCH 17, 2016

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I. INTRODUCTION

This Annual Plan provides information on activities planned by the Philadelphia Housing Authority (PHA) under the Moving To Work Demonstration Program (MTW) for PHA Fiscal Year 2016, i.e. the period from **April 1, 2015 to March 31, 2016**.

PHA has been an MTW agency since April 2001, operating under an MTW Agreement with the U.S. Department of Housing and Urban Development (HUD). The MTW Agreement as amended describes the authority and flexibility granted to PHA under MTW and the requirements for participation.

MTW is a demonstration program authorized by Congress, through which PHA and other participating agencies are given the flexibility to waive certain statutes and HUD regulations to design and test approaches for providing housing assistance that address one or more of the following statutory objectives:

1) Reduce cost and achieve greater cost effectiveness in Federal expenditures;
2) Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and
3) Increase housing choices for low-income families.

Through the MTW Demonstration, PHA will continue to substantially transform its properties and programs, utilizing flexibility provided by the MTW Agreement in virtually every area of agency operations. In an era of diminishing Federal resources, effective and innovative use of MTW flexibility is more critical than ever to the future of PHA and its residents.

MTW Long-Term Goals and Objectives

During the first year of the MTW program, PHA established five (5) broad objectives for the MTW Demonstration Program:

- Reform the existing Housing Choice Voucher and Public Housing Programs to improve and increase the supply of quality affordable housing throughout the City of Philadelphia.

- Revitalize neighborhoods where MTW and MTW-eligible residents reside.

- Develop a MTW Family Program to furnish comprehensive family self-sufficiency services to eligible MTW families.

- Establish a Quality of Life Program to promote a living environment that fosters community values, encourages resident participation and positive peer group pressure, and reinforces the responsibilities of public housing residents, voucher participants, voucher landlords, and PHA to one another and to the broader community.

- Establish efficient operating procedures and implement cost-saving strategies.

Under the direction of President and Chief Executive Officer, Kelvin A. Jeremiah, PHA has continued and expanded the use of MTW flexibility in promoting PHA's long-term strategic objectives. PHA has sharpened its focus on improving performance in core business operational areas including property management, maintenance services and resident services and on expanding partnerships with the City, non-profit agencies and other community stakeholders. PHA's focus emphasizes the need to strengthen people, property and partnerships. T

In FY 2015, PHA engaged in a comprehensive Strategic Directions planning process to identify long-term strategic priorities and initiatives. The process has involved the Board of Commissioners, employees, residents and an extensive group of community stakeholders. A draft of the Strategic Directions Plan had been published for public comment, and Board approval was received in December 2014. The planning process identified a new mission statement and twelve strategic priorities that provide a framework for both future MTW activities and PHA's overall management strategy:

1. Preserve and expand the supply of affordable housing available to Philadelphia's residents with low-incomes

2. Achieve excellence in the provision of management and maintenance services to PHA residents

3. Create safe communities in collaboration with neighborhood residents and law enforcement agencies

4. Enhance resident well-being and independence through partnerships for employment, job training, education, health and other evidence-based supportive services

5. Improve access to quality housing choices and opportunity neighborhoods through the Housing Choice Voucher program

6. Incorporate energy conservation measures and sustainable practices throughout PHA operations

7. Improve customer service, streamline operations and create a business model that is data-driven and high performing

8. Conduct PHA business in an open and transparent manner that promotes accountability and access, ensures diversity and adheres to the highest ethical standards

9. Strengthen existing relationships and forge new public, private and philanthropic partnerships to support PHA's strategic goals

10. Make PHA an employer of choice with an accountable, diverse, trained and productive workforce

11. Ensure that PHA is a good neighbor and reliable community partner

12. Encourage innovation and promote PHA's financial health through ongoing participation in the Moving To Work Program

With respect to strategic priority #12, the term of the MTW Agreement between HUD and PHA runs through Fiscal Year 2018. MTW regulatory and funding flexibility has been enormously important to PHA's efforts to revitalize deeply distressed public housing developments and their surrounding neighborhood, support the City of Philadelphia's Blueprint to End Homelessness initiative, and assist residents to secure job training, job placements, homeownership and other opportunities. PHA and other participating MTW agencies are currently engaged in discussions with HUD regarding a long-term extension of the program. In the coming months, PHA will continue discussions with HUD and other parties as needed with the goal of securing an MTW Agreement extension with substantially similar terms to the current Agreement.

FY 2016 Goals and Objectives

PHA plans to implement a coordinated, comprehensive program of capital improvements, development activities, maintenance and management initiatives, and resident supportive services in FY 2016. PHA's funding for this period is unknown as of the publication date of the MTW Annual Plan; thus, the activities described herein may be modified based on actual funding levels.

MTW activities are defined by HUD as only those activities that specifically require MTW authority or Block Grant flexibility to implement. Highlights of PHA's planned MTW activities include:

- ***"6 in 5" Program for an Affordable Future*** – PHA established this initiative to develop, acquire or preserve affordable housing in the City of Philadelphia. The initiative involves a range of strategies including PHA-developed projects that provide for redevelopment and/or replacement of obsolete properties; initiatives to ensure the long-term affordability of Low Income Housing Tax Credit properties; and partnerships with the City, non-profit agencies and local developers on new construction, acquisition and substantial rehabilitation projects. PHA utilizes MTW Block Grant and other non-MTW funding to support many of these developments. In addition to using MTW Block Grant funding to support these projects, PHA incorporates other MTW flexibility in admissions, continued occupancy and other programmatic requirements. In FY 2016, PHA and its partners projects that 293 new public housing units will come on line as shown in Table 1 of the MTW Plan, and an additional 350 units will be placed under Housing Assistance Payments contracts as shown in Table 3.

- ***Neighborhood Transformation Activities at Blumberg/Sharswood and Norris/North Central Philadelphia*** - A number of additional development projects will proceed during FY 2016 that involve both MTW Block Grant and other non-MTW funds including the Phase 1 redevelopment of Blumberg Apartments and the initial phase of the Choice Neighborhood Implementation Plan at the Norris Homes development. At Blumberg, PHA was awarded a $12.5 million, 9% Low Income Housing Tax Credit award to partially fund Phase I activities

and is also engaging in a neighborhood-wide Transformation Plan through a $500,000 Choice Neighborhoods Planning Grant. Both of these activities started in FY 2015. At Norris Homes, PHA received a $30 million Choice Neighborhoods Implementation grant in FY 2015 and expects to finalize the first phase in FY 2016.

- ***Homeless Veterans Initiative* –** Working with the City and the Department of Veterans Affairs, PHA is committed to eliminating homelessness among our nation's veterans. These activities include continuing to maximize leasing under the Veterans Affairs Supportive Housing (VASH) – which is a non-MTW program - and providing operating support for the new 18-unit IMPACT Veterans project that is currently under construction and projected to be ready for occupancy in FY 2016. The IMPACT Veterans project will utilize MTW Block Grant and other non-MTW funds.

- ***Scattered Site Asset Repositioning Strategy*** – PHA will continue implementation of an asset repositioning strategy for the scattered site portfolio to promote neighborhood revitalization, generate revenue, and reduce operating expenses. In addition to a disposition and auction of greater than 100 vacant and obsolete scattered site properties planned for FY 2016, PHA is working with partners to develop new small scale replacement housing projects using MTW Block Grant and/or other non-MTW funds that will help to strengthen and revitalize Philadelphia's neighborhoods. PHA has also submitted an application to convert a number of long-term vacant scattered site units under the Rental Assistance Demonstration (see discussion below) in order to dispose of severely distressed units and preserve subsidy by developing replacement units. As noted below, RAD is not an MTW activity; however, PHA may request HUD approval to incorporate MTW funding and or other MTW programmatic flexibility into these transactions. PHA is also developing master plans for a number of Philadelphia neighborhoods that are under tremendous market rate development pressure in order to create and preserve affordable housing and allow low and moderate-income households to continue to benefit from access to and amenities of these areas. These areas include: Point Breeze, Temple Area, Brewerytown, Francisville, Spring Garden, and the Promise Zone in Philadelphia. MTW Block Grant and other non-MTW funding will be used to support PHA's asset repositioning initiatives.

- ***Rental Assistance Demonstration* –** In FY 2014, PHA submitted an application to convert approximately 2,899 public housing units to project-based rental assistance under the Rental Assistance Demonstration (RAD) Program. Subject to HUD approval (which potentially could occur in FY 2016), PHA may use MTW Block Grant funding and MTW programmatic flexibility to the extent allowed by HUD under the RAD Notice and related guidance as part of the RAD conversion strategy. Through the RAD conversion process, PHA plans to raise new private capital funding to rehabilitate and preserve critically needed existing housing stock.

- ***Public Safety Initiatives*** – PHA will continue efforts to strengthen and improve safety and security for residents and staff including operating mobile mini-stations, bike patrols, and a Crime Suppression Team, as well as implementing automated security systems at PHA developments that allow for central control and monitoring. Using MTW Block Grant and other funding, PHA has adopted a community-policing model that links its policing activities

to the broader framework provided by the City's Police Department and works in conjunction with members of the business community, faith-based organizations, community groups, non-profit groups, victim service providers, health service providers, the media, individuals, and other city agencies. In tandem, a new task force consisting of residents, staff, and partners has been charged with identifying other strategies to fight crime at PHA developments under the PHA Safe, Affordable Housing for Everyone (SAFE) Program. PHA is also actively collaborating with the City and a consortium of local agencies to implement a comprehensive Youth Violence Prevention Strategic Plan.

- ***Energy Performance Contracting*** **-** The MTW Agreement, as amended, authorizes PHA, without prior approval from HUD, to enter into new Energy Performance Contracts (EPCs) or modify existing EPCs, subject to certain limitations set forth in Attachment D. In FY 2016 and continuing thereafter, PHA will determine whether to procure an Energy Service Company (ESCo) or function as its own ESCo, and will initiate procurement of appropriate services in order to structure, plan and move forward with implementation of an EPC. PHA anticipates that the MTW Agreement will be extended prior to 2018. Depending on the provisions of any such extension, the proposed EPC and ESCo initiatives may extend beyond the MTW Agreement's term. PHA will factor this issue into its planning and, if needed, will consult with HUD.

- ***Self-Sufficiency and Youth Development Programs*** **–** PHA utilizes MTW Block Grant and other funds – including private and other funds raised through the PhillySEEDS entity - to support extensive youth development, adult education, employment and training, nutrition and other supportive services. In FY 2016, PHA plans to enhance scholarship, afterschool, summer camp, and preschool programming. This includes enhancements to the after school youth programs which include homework assistance, project based learning, work experience, community service and recreation, including edutainment. A new initiative, Scholars' Internship Program (SIP), will be launched to augment existing scholarship program by offering internships to scholarship recipients in their major area of study. PHA also plans to continue its summer food program at 20 conventional sites. The program is partially funded by the Pennsylvania Department of Education. PHA augments it with summer camp activities. PHA will also continue to offer a broad array of self-sufficiency services focused on helping residents prepare for the workforce and obtain jobs with living wage incomes. PHA's program design incorporates appropriate incentives and disincentives, is evidence-based and is outcome-driven. A critical ongoing objective is for PHA to maximize and leverage its investments through innovative partnerships with State, City, and non-profit agencies, universities, and social services organizations. A major focus in FY 2016 will be to improve employment outcomes and prepare residents to benefit from economic activity in both the Norris and Sharswood/Blumberg Choice Neighborhoods. The Pre-Apprenticeship Program will continue to train residents for building maintenance employment and provide some customized training for residents from PHA's Choice Neighborhood Implementation Program at Norris Homes. In FY 2016, PHA will build on this foundation, including seeking Jobs Plus funding for self-sufficiency objectives in targeted communities. A summary of PHA's MTW and Non-MTW funded resident services programs is found on Table 10.

- ***Second Chance Initiative*** – PHA has begun to implement a time-limited, ten voucher pilot program to provide supportive services and housing subsidies to formerly incarcerated returning citizens that are active participants in good standing with the Eastern District Federal Court Supervision to Aid Reentry (STAR) Program and Mayor's Office of Reintegration Services (RISE) Program. PHA projects that the program will reach full utilization by the end of FY 2016.

- ***Nursing Home Transition*** – PHA will continue to work with the City and State to provide affordable housing opportunities for people with disabilities who are able to transition from nursing homes to community-based settings.

- ***Asset Management*** – Utilizing MTW flexibility, PHA has established a Local Asset Management Plan as defined in Appendix A. In FY 2016, PHA will continue efforts to consolidate and streamline property management and maintenance operations based on asset management principles. The goal of this effort is to more closely align PHA's asset management to multi-family industry norms, with allowances for the unique features of PHA's organization and portfolio.

- ***Rent Simplification Initiatives*** – PHA will continue to implement previously approved MTW initiatives that simplify program administration and provide incentives for economic self-sufficiency.

In tandem with its MTW implementation activities, PHA will implement other initiatives in FY 2016 that do not specifically require MTW authority or Block Grant flexibility to administer. Highlights of PHA's planned Non-MTW activities include:

- ***Reducing Homelessness Initiative*** – In addition to the homeless veterans initiatives noted above, PHA will continue to actively collaborate with the City, social service and local non-profit agencies on a series of initiatives to reduce and help prevent homelessness. Under the Blueprint to End Homelessness program, PHA plans to provide 500 housing opportunities annually for formerly homeless families that are leaving transitional housing.

- ***HCV Mobility Pilot Program*** –PHA will continue implementation of the HUD-funded pilot Housing Choice Voucher Mobility Program in partnership with other Housing Authorities in the region, HUD, Quadel, the First Suburbs Project and other local/regional partners. The overall goal is to encourage voucher holders to find housing and jobs in areas that provide higher economic, educational, and social mobility opportunities both within and outside of the City of Philadelphia. Participants are provided with a broad range of supportive services, housing counseling, and other efforts to promote the successful transition to higher opportunity areas.

- ***Improving Access to PHA Programs and Services*** – PHA will expand its efforts to ensure open access to PHA programs to non-English speakers and the hearing/sight impaired. Implementation of the Board-approved Language Access Plan will continue including the provision of translation services, development of new translated forms and other efforts to promote access and diversity.

- ***Lease Enforcement*** – PHA will strengthen its internal efforts to ensure enforcement of all lease provisions, including increasing rent collections and ensuring timely management responses to lease violations.

- ***Better Buildings Challenge*** - In October 2013, PHA became a partner in the U.S. Department of Energy's Better Buildings Challenge (BBC), signing a commitment to reduce energy consumption across its entire portfolio by at least twenty percent (20%) over the ten (10) years measured from the base year of 2010. The BBC partnership agreement required PHA to initiate a 'showcase project' of energy retrofit measures by October 2014, and PHA has developed a plan for the installation of energy conservation measures at Morton Homes during FY 2015 and 2016. And, in implementing its commitment to reduce overall energy consumption, PHA will begin work on an EPC, as described above, and other significant energy conservation measures at suitable sites.

- ***No Smoking Initiative*** –Subject to approval by the Board of Commissioners, in FY 2016 PHA plans to prohibit smoking at all Conventional, Low Income Housing Tax Credit, and Scattered Site residential units for all existing and new developments. Procedures for implementation will be developed with input from resident leadership and the Board. PHA will coordinate the provision of smoking cessation information and/or assistance to all interested residents in conjunction with the Philadelphia Department of Public Health and other partners.

- ***Office of General Counsel Initiatives*** – In FY 2016, OGC will continue to direct and respond to all PHA legal matters, ensuring careful oversight and control of expenditures on outside legal counsel. Among many other initiatives, OGC will support the PHA Board of Commissioners in refining by-laws, improving meeting practices and procedures and other governance matters. OGC will also work closely with PHA operational departments in ongoing efforts to enhance lease enforcement; provide support to PHA's extensive development initiatives including the evaluation and processing of RAD conversion applications; and assist in improving PHA's risk mitigation strategies.

- ***Supply Chain Initiatives*** – Supply Chain plans to implement improvement efforts in FY 2016, including activities to expand supplier outreach; increase involvement of MBE/WBE entities as PHA vendors; reduce processing times for invoice approvals and vendor solicitations; and strengthen the vendor evaluation process. A goal of improving scheduling efficiency and reducing PHA's vehicle fleet size has also been established for FY 2016. A new Investment Recovery Program will be developed to maximize the value of surplus or obsolete assets through online auctions and other revenue generating activities.

- ***Automation Initiatives*** – Other efforts to improve customer service and streamline PHA's operations will continue in FY 2016. Planned efforts led by PHA's Information Systems Management division include: Upgrading PHA's Oracle/PeopleSoft Enterprise System for Financial, Supply Chain, Inventory and Grant Applications, Implementing additional Video and Surveillance system for the remaining PHA's Development subject to budget availability.

Implement Section 3 tracking application and integrate it with our existing Section3 Job Bank.

- ***Grant Opportunities*** - PHA plans to actively pursue other funding opportunities that may include Jobs Plus, Choice Neighborhoods Implementation for Blumberg/Sharswood, Family Self Sufficiency Coordinator, Summer Food Service Program and other available funding opportunities.

PHA will periodically review and revise ongoing initiatives (both MTW and non-MTW activities) as needed in response to current conditions and priorities and to take advantage of new/emerging opportunities.

Background on the MTW Annual Plan

This is the fifteenth Annual Plan submitted by PHA under the MTW Demonstration Program. The FY 2016 Annual Plan incorporates HUD's current requirements effective as of May 2013. The Annual Plan elements have been restructured and modified as needed to comply with HUD's regulations.

As part of each year's MTW planning process, PHA provides opportunities for residents, PHA staff and the broader community to review the proposed goals and objectives and offer feedback, consistent with the requirements of the MTW Agreement.

Prior to finalizing the Annual Plan, PHA conducted a meeting with resident leadership on November 25, 2014 to discuss its contents and provide opportunities for resident input. PHA posted the draft Plan on its website and provided a thirty day public comment period to allow for resident and general public review. PHA also conducted a public hearing on December 1, 2014 and obtained Board of Commissioners approval prior to submission of the Plan to HUD.

II. GENERAL OPERATING INFORMATION

A. Housing Stock Information

Planned New Public Housing Units

As part of the affordable future initiative to develop, acquire and/or preserve affordable housing, PHA plans to add 293 new public housing units to its inventory during the Plan year. As detailed in Table 1 below, this includes planned new units at:

1. *Markoe Street*
2. *Blumberg*
3. *Queen Lane*
4. *Queen Row*
5. *Impact*
6. *New Courtland*
7. *Saint Francis Villa Senior Housing*
8. *Susquehanna Square Housing*

Note that the actual number of public housing units developed during the Plan year may vary from the planned total based on progress in securing Low Income Housing Tax Credit funding, the timing of HUD and local approvals, and other factors. Subject to Board and HUD approval, PHA may consider one or more of the planned projects for the Rental Assistance Demonstration program as an alternative to ACC funding. Also note that Table 1 does not reflect redevelopment activity that is projected to start in FY 2016, but that is not expected to result in new units on-line until after the period.

Table 1: Planned New Public Housing Units During FY 2016

AMP Name and Number	Bedroom Size							Total Units	Population Type	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible**	Adaptable
Markoe Street	0	0	6	0	0	0	0	6	General	1	0
Blumberg	0	10	25	19	3	0	0	57	General	6	tbd
Queen Lane	0	9	26	20	0	0	0	55	General	6	0
Queen Row	0	16	8	0	0	0	0	24	General	2	
Saint Francis Villa Senior Housing	0	40	0	0	0	0	0	40	Elderly	4	0
Susquehanna Square	0	6	21	10	0	0	0	37	General	11	0
Impact Veterans	0	0	18	0	0	0	0	18	Other	2	0
New Courtland	0	56	0	0	0	0	0	56	Elderly	5	0
Total Public Housing Units to be Added								293			

Other Population Type: Supportive Housing (Veterans)

Planned Public Housing Units to Be Removed from Inventory

As part of its revitalization program and ongoing portfolio assessment and repositioning efforts, PHA plans to demolish and/or dispose of a total of 1,854 units as summarized in Table 2. Planned partial demolition activity at Norman Blumberg Apartments and Norris Apartments is part of an ongoing revitalization program for each of these sites, paving the way for newly redeveloped communities. PHA is also proceeding with demolition/disposition of vacant and obsolete scattered site units. PHA is planning another auction or public sale of scattered site units in the near future. Some scattered site units will be replaced by new developments sponsored by PHA and/or its partners. While Table 2 provides an estimate of the number of units to be removed from the public housing inventory during the Plan Year, the actual number may vary depending on the timetable for HUD approvals, auction activity, land banking approvals with the City of Philadelphia, and other factors. The scattered site units listed in Table 2 include units already approved for disposition by HUD, as well as additional obsolete units for which PHA may request HUD disposition approval in FY 2016.

Table 2: Planned Public Housing Units to Be Removed During FY 2016

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
PA002000050 Norman Blumberg	414	Partial demolition and redevelopment of obsolete development
PA002000014 Norris Apartments	147	Demolition and redevelopment of obsolete development – RAD Conversion and Choice Neighborhood Project
PA 901 Scattered Sites	29	Disposition of obsolete scattered sites under Repositioning Initiative
PA 902 Scattered Sites	95	Disposition of obsolete scattered sites under Repositioning Initiative
PA 903 Scattered Sites	32	Disposition of obsolete scattered sites under Repositioning Initiative
PA 904 Scattered Sites	47	Disposition of obsolete scattered sites under Repositioning Initiative
PA 905 Scattered Sites	166	Disposition of obsolete scattered sites under Repositioning Initiative
PA 906 Scattered Sites	121	Disposition of obsolete scattered sites under Repositioning Initiative
PA 907 Scattered Sites	268	Disposition of obsolete scattered sites under Repositioning Initiative
PA 908 Scattered Sites	81	Disposition of obsolete scattered sites under Repositioning Initiative
PA 909 Scattered Sites	256	Disposition of obsolete scattered sites under Repositioning Initiative
PA 910 Scattered Sites	198	Disposition of obsolete scattered sites under Repositioning Initiative
Total Number of Units to be Removed	**1,854**	

Planned New Project-Based Voucher Leasing

PHA provides project-based subsidies to non-profit sponsors and private property owners through its Unit-Based Leasing and Development (UBV) MTW initiative. Table 3 below provides details on new UBV developments that PHA plans to subsidize during the Plan Year, with a projected total of 350 new units. Overall, PHA projects those 2,411 units will be committed by the end of the Plan Year. Actual contract/leasing figures may vary based on factors, including contract terminations or suspensions, new projects approved by the PHA Board, and other considerations.

Table 3: New Housing Choice Vouchers to be Project-Based During FY 2016

Property Name	Anticipated Number of New Vouchers to be Project-Based	Description of Project
Belmont Village I	25	Target population is very low income seniors and disabled households. Project consists of a newly constructed 25 unit building in West Philadelphia. Supportive services are available to residents.
Belmont Village II	15	Target population is very low income seniors and disabled households. Project consists of a newly constructed 15 unit building in West Philadelphia. Supportive services are available to residents.
Centennial Village	23	Target population is low-income families and disabled households. New Construction site located in West Philadelphia.
4050 Apartments	20	Target Population is eligible low-income families including artists in live-work spaces. New Construction site is located in West Philadelphia. Supportive services will be provided.
Grace Townhomes	36	Target Population is low income families. New construction site is located in the Kensington section of Philadelphia.
H.E.L.P Philadelphia V	15	Target Population is senior homeless veterans. New Construction is located in the Spring Garden section of Philadelphia. Supportive services will be provided.
Liberty Resources	7	Target Population is non-elderly disabled. Rehabilitation sites at two locations in Northeast Philadelphia. Supportive services will be provided.
Project HOME – 810 Arch Street	50	Target population is very low income homeless households. Rehabilitation Project consists of 50 units in low-rise Center City location. Supportive services are available to residents.
HELP USA	15	Target population is veteran families. New Construction Project consists of 15 units in row homes in West Philadelphia.
CATCH Shared Housing	25	Target population is disabled households. Existing project is in South Philadelphia. Supportive services will be provided with a focus on behavioral health and intellectual disability services.
Impact Veterans Housing	8	Target population is veterans families. Rehabilitation project in the Kensington neighborhood consists of 26 units, of which 18 are public housing and 8 are PBV. Supportive services will be provided.
New Courtland at Allegheny Ave, Phase II	20	Voucher award approved by PHA Board in December 2014. New Construction development located in North Philadelphia for seniors. Occupancy date December 2015.
Jannie's Place	11	Voucher award approved by PHA Board in March 2015. Existing development located in West Philadelphia for homeless families.
Hope Bridge	28	Voucher award approved by PHA Board in March 2015. Existing development located in West Philadelphia for single females with special needs.
Intercommunity Action Inc.	13	Voucher award approved by PHA Board in March 2015. Existing development located in the Roxborough section of Philadelphia for individuals and families with mental illness.
Fattah Homes	6	Voucher award approved by PHA Board in March 2015. Existing development located in West Philadelphia for homeless families.
Oakdale Street	12	New construction in North Philadelphia developed by PHADC. Target population is low income families and people with disabilities.
Gordon Street	21	Target population is low income families and people with disabilities. Building is new construction located in North Philadelphia and developed by PHADC.

Anticipated Total New Vouchers to be Project-Based	**350**

Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	**2,411**
Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	**2,277**

Other Planned Changes to Housing Stock

PHA's ongoing and future development efforts will continue to be guided by development principles approved by the PHA Board in September 2012. This policy statement provides the framework for future development activities undertaken with public and private partners. It clarifies the selection and review processes and provides guidance on PHA's commitment to Section 3 jobs, sustainable development, defensible space principles, and other important issues. In light of serious fiscal constraints, PHA's policy also emphasizes the importance of achieving maximum leverage with limited public funds.

In FY 2016, PHA will continue to seek additional proposals from prospective partners for affordable housing. Under its Local Unit Based RFP, PHA is seeking to develop alternatively managed public housing sites. Over the coming year, PHA projects that it will enter into partnerships for additional Board-approved proposals.

Subject to funding availability and completion of all HUD and other approvals, PHA intends to commence the redevelopment of Blumberg and Norris Homes during the Plan Year.

Working in collaboration with the City of Philadelphia, PHA will seek to help further the mutual goal of large scale new affordable housing. The initiative envisions the construction of 1,000 affordable rental units and 1,000 ownership units affordable for moderate-income households in the immediate future. PHA has positioned itself to help further this initiative with the following planned projects listed in Table 4 below:

Table 4: Other Planned Changes to Housing Stock

Site	Description of Project	Potential Funding
Pepper/Bartram Annex School Sites	Redevelopment of vacant school site in Southwest Philadelphia. Project is proposed as a 400+/- mixed use, mixed income community. Master planning and acquisition activities are proposed.	Tax Credits, New Market Tax Credits, MTW funds, and Bond funds
Walton School Sites	Redevelopment of a vacant school site in the Strawberry Mansion Section of the proposed. Proposed reuse is a 40 unit senior housing facility.	Tax credits and MTW funds
Reynolds School Site	Acquisition and redevelopment support of vacant school site in the Blumberg/ Sharswood community. This is an anchor project to stabilize the community. This will seek to improve educational outcomes for youth with services and support delivered directly to youth and their families.	Bond Funds , other funding TBD
New West (West Philadelphia Sites)	New West is comprised of four transit	Tax Credits and MTW funds

Site	Description of Project	Potential Funding
	oriented development sites along the Western line of the Market Frankford Line (EL) train in West Philadelphia. It will include mixed-use and income development to target housing deficiencies and provide economic stabilization to the commercial corridor. This will catalyze adjacent current development at 46th Street, 52nd Street and in the Philadelphia Promise Zone.	
2012 Chestnut Street (vacant office facility)	Proposals for the adaptive (highest and best) reuse of PHA's former headquarters will be solicited for redevelopment to include units of mixed-income housing in Center City.	Development Partnerships (TBD), CDBG
Schuylkill Falls (vacant land adjacent to Schuylkill Falls HOPE VI development)	Proposals for the adaptive (highest and best) reuse of PHA surplus and vacant land at Schuylkill Falls site will be solicited.	Development Partnerships (TBD)
Strawberry Mansion Apartments	PHA is in the pre-development stages of a new development known as Strawberry Mansion Apartments which will involve the new construction of 67 infill units of rental housing in the Strawberry Mansion section of North Philadelphia.	Tax Credits, Replacement Housing Funds
Point Breeze	PHA is expecting to begin construction of approximately 20 units of replacement scattered site units in the Point Breeze section of South Philadelphia	Tax Credits and MTW funds

In addition to the above, PHA may solicit development proposals for the redevelopment of Bartram Village and undertake a new solicitation for development proposals for the former Liddonfield development site.

By some accounts, in the City of Philadelphia by FY 2016 there will be 101 acres of land comprised of vacant/closed school buildings. The best instances of adaptive reuse support the redevelopment of a building that no longer serves its original purpose while giving back to the community. Taken together, school closings that affect PHA affordable developments, City of Philadelphia Affordable Housing Units Initiatives, PHA's Affordable Future initiatives, there will be tremendous opportunity and need for capital resources for development. In addition, PHA has or will soon select developer partners for a number of vacant properties owned by PHA throughout the City.

General Description of Planned Capital Expenditures

PHA's capital planning and development strategies are designed to support, rehabilitate, and modernize existing PHA sites and to revitalize neighborhoods throughout the City. Coordination with the City of Philadelphia's neighborhood revitalization efforts is a major priority for PHA. PHA works to leverage its limited PHA resources with other resources such as Low Income Housing Tax Credits, private equity, and state and local funding sources. Utilization of MTW funding and programmatic flexibility remains a critical element in PHA's modernization and development efforts.

PHA maintains updated physical needs assessments including estimated replacement and/or repair costs for all PHA developments. Capital needs continue to dramatically exceed available funding.

Table 5 provides information on PHA's planned capital expenditures for FY 2016. Note that PHA is required to submit this Annual Plan in advance of receipt of federal funding information for the fiscal year. In light of continuing reductions in federal funding and the uncertainty of future funding, the information on Table 5 is preliminary and subject to change based on actual funding. Actual obligations and expenditures may vary based on other factors such as construction schedules, timing of local approvals, and new and emerging repair needs.

In addition to funding for new projected units listed in Table 1, Table 5 includes funding for planned major redevelopment efforts that are expected to start in FY 2016 at Blumberg and Norris Homes, subject to required approvals and funding availability.

With regards to the Blumberg Revitalization and as part of PHA's long-term strategy to consolidate PHA's operations, PHA has approximately $40 million budgeted to acquire, and construct an administrative office facility. This is planned on the Ridge Ave. corridor and will be part of the mixed use redevelopment undertaking. This facility will ensure greater efficiency of operations for PHA departments, which are currently located in multiple locations throughout the City of Philadelphia. This consolidation would likely involve disposition or conveyance of existing administrative facilities.

Table 5: Planned Capital Expenditures During FY 2016

Development/Project	Project	Project Description	FY 2016 Estimated Expenditures
West Park Apartments	Electrical Capital Work	Elevator Upgrades	$5,000,000.00
Gordon Street	New Development	21 Units New Construction of PHA- owned PBV Assisted housing	$6,700,000.00
Queen's Row	New Development	Acquisition and Rehabilitation of 24 unit complex for Public Housing	$2,207,000.00
Queen Lane Apartments	New Development	Redevelopment - Development of Office Space, Community room and 55 residential units	$11,000,000.00
Blumberg Sharswood	New Development	New Construction of Phase I - 57 Units LIHTC Project	$8,000,000.00
Norman Blumberg	Civil Capital Work	Senior Tower Exterior Façade and Roof Repair	$683,749.00
Markoe Street	New Development	Development of 6 residential public housing units 800 Block of North Markoe Street	$2,000,000.00

Development/Project	Project	Project Description	FY 2016 Estimated Expenditures
Norris	New Development	Phase I (Off-Site) - New construction of 100 rental units	$1,500,000.00
Norris	Development	Homeownership - 25 Units	$9,645,000.00
Norman Blumberg	Electrical Capital Work	Elevator Upgrades in Senior Tower (Modernization)	$1,000,000.00
Hillcreek	Hillcreek	Roof Replacement	$300,000.00
Katie B Jackson	Civil Capital Work	Roof Replacement Drainage and Flashing	$130,000.00
PHA WIDE SS	Scattered Sites Unit Rehab	Comprehensive SS Unit Rehab (320 Units)	$15,000,000.00
Haddington	Haddington	Roof Replacement	$604,705.00
Blumberg Sharswood	New Development	New Street Design	$50,000.00
Norman Blumberg	Blumberg	1st Floor Community Center Renovation at Senior Building including utility isolation	$1,500,000.00
Suffolk Manor	Suffolk Manor	Water Penetration Investigation and Repair	$489,000.00
LEB Community Center	New Development	Development of a new community center at 49th and Aspen Sts.	$1,500,000.00
Blumberg Sharswood	New Development	Demolition Activities - Demolition of Standing family Towers and Low Rise Family Units	$6,000,000.00
Johnson Homes	Mechanical PNA Capital Work	Pipe Insulation	$200,000.00
Ridge Avenue	PHA Administrative Office Facility	New Construction	$40,000,000.00
Total:			$113,509,454.00

Table 5A below is provided for informational purposes. It is a current list of additional planned capital projects and total budget estimates. This includes projects expected to be implemented in future years, but for which expenditures are not likely to occur in FY 2016.

Table 5A: Additional Planned Capital Projects and Estimated Budget

SITE NAME	PROJECT	DESCRIPTION	ESTIMATED BUDGET
Abbottsford	Energy Efficiency Upgrades	Survey, assess & repair/replace domestic underground cold water dist; provide water metering if feasible	$8,000,000.00

SITE NAME	PROJECT	DESCRIPTION	ESTIMATED BUDGET
Abbottsford	Abbottsford	REAC site repairs - Utility poles replacement	$55,000.00
Bartram Village	Energy Efficiency Upgrades	Window Replacement	$2,118,758.00
Bentley Hall	Electrical PNA Capital Work	Elevator Upgrades(Modernization)	$1,200,000.00
Blumberg Apartments	Development	Phase II (A) (On-Site) - 60 units H/O	$12,000,000.00
Blumberg Apartments	Development	Phase II (On-Site) - 80 units	$1,869,582.00
Blumberg Apartments	Development	Phase III (Off-Site) - New construction of approximately 60 units	$1,500,000.00
Blumberg Sharswood	New Development	New Streets: Construction of new street grid.	$5,000,000.00
Blumberg Sharswood	New Development	Relocation of Existing Tenants	$1,264,000.00
Blumberg Sharswood	Development Acquisition	Acquisition of Properties for Blumberg Choice Neighborhood Project	$45,000,000.00
Collegeview	Mechanical Capital Work	Sanitary upgrade	$900,000.00
Collegeview	Mechanical Capital Work	Mechanical Room Upgrades	$1,100,000.00
Emlen Arms	Mechanical PNA Capital Work	Provide automatic blow down systems for all steam boilers except B-1 & B-3 at West Park	$24,000.00
Fairhill	Mechanical PNA Capital Work	Provide automatic blow down systems for all steam boilers except B-1 & B-3 at West Park	$24,000.00
Fairhill	Civil Capital Work	Painting	$125,000.00
Fairhill Square	SS Concrete Repair	SS Concrete Repair	$134,933.00
Fairhill Square	SS Carpentry	SS Carpentry	$20,895.00
Fairhill Square	SS Roofing	SS Roofing	$84,000.00
Fairhill Square	SS Heating Upgrades	SS Heating Upgrades	$20,000.00
Fairhill Square	SS Painting	SS Painting	$30,000.00
Francisville	SS Roofing	SS Roofing	$36,000.00
Francisville	SS Concrete Repair	SS Concrete Repair	$51,524.00
Francisville	SS Heating Upgrades	SS Heating Upgrades	$20,000.00
Francisville	SS Painting	SS Painting	$30,000.00
Francisville	SS Carpentry	SS Carpentry	$9,790.00
Germantown	Mechanical PNA Capital Work	Repair controls of all 6 MUA Units; rebalance them to code required ventilation levels	$120,000.00

SITE NAME	PROJECT	DESCRIPTION	ESTIMATED BUDGET
Germantown	Mechanical PNA Capital Work	Provide automatic blow down systems for all steam boilers except B-1 & B-3 at West Park	$24,000.00
Germantown/Hunting Park	SS Roofing	SS Roofing	$92,500.00
Germantown/Hunting Park	SS Heating Upgrades	SS Heating Upgrades	$20,000.00
Germantown/Hunting Park	SS Carpentry	SS Carpentry	$25,586.00
Germantown/Hunting Park	SS Painting	SS Painting	$30,000.00
Germantown/Hunting Park	SS Concrete Repair	SS Concrete Repair	$121,544.00
GGFE	Mechanical Capital Work	HVAC Controls Upgrade	$80,000.00
Haddington	SS Roofing	SS Roofing	$130,000.00
Haddington	SS Concrete Repair	SS Concrete Repair	$177,184.00
Haddington	SS Painting	SS Painting	$30,000.00
Haddington	SS Carpentry	SS Carpentry	$39,809.00
Haddington	SS Heating Upgrades	SS Heating Upgrades	$20,000.00
Harrison Plaza	Energy Efficiency Upgrades - Mechanical Capital Work	HVAC Upgrade - Low Rises Unit Heater Replacement	$500,000.00
Harrison Plaza	Civil Capital Work	Exterior Façade Restoration	$2,800,000.00
Harrison Plaza	Civil Capital Work	Painting	$125,000.00
Hillcreek	Mechanical PNA Capital Work	Rebuild/correct Heating Hot Water distribution with controls to provide water temperature reset; all buildings	$2,000,000.00
Hillcreek	Electrical PNA Capital Work	Upgrade Electrical Distribution and Panels, Unit Wiring Upgrade	$1,000,000.00
Hillcreek	General Upgrades	Mechanical, Electrical, Sprinkler Upgrades & Fencing	$5,273,856.00
Holmecrest	Mechanical Capital Work	New Underground Heating Distribution	$1,001,100.00
Johnson Homes	Energy Efficiency Upgrades	Tub Diverter Replacement	$500,000.00
Johnson Homes	Mechanical PNA Capital Work	Bring Boiler Rooms up to code(enclosures, ventilation, combustion air, safety, floor drains, doors, fire alarm, security); All 9 Boiler Rooms	$1,200,000.00
Johnson Homes	Civil Capital Work	Fencing	$250,000.00
Johnson Homes	Development	Comprehensive Modernization (Year 1) of Units, Systems	$20,000,000.00
Johnson Homes	Development	Comprehensive Modernization (Year 2) of Units, Systems	$21,200,000.00

SITE NAME	PROJECT	DESCRIPTION	ESTIMATED BUDGET
Kingsessing	SS Concrete Repair	SS Concrete Repair	$328,539.00
Kingsessing	SS Carpentry	SS Carpentry	$27,924.00
Kingsessing	SS Roofing	SS Roofing	$164,500.00
Kingsessing	SS Painting	SS Painting	$30,000.00
Kingsessing	SS Heating Upgrades	SS Heating Upgrades	$20,000.00
Ludlow	SS Heating Upgrades	SS Heating Upgrades	$20,000.00
Ludlow	SS Carpentry	SS Carpentry	$13,684.00
Ludlow	SS Painting	SS Painting	$30,000.00
Ludlow	SS Roofing	SS Roofing	$72,000.00
Ludlow	SS Concrete Repair	SS Concrete Repair	$67,683.00
Mantua	SS Painting	SS Painting	$30,000.00
Mantua	SS Concrete Repair	SS Concrete Repair	$80,383.00
Mantua	SS Roofing	SS Roofing	$96,000.00
Mantua	SS Heating Upgrades	SS Heating Upgrades	$20,000.00
Mantua	SS Carpentry	SS Carpentry	$12,155.00
Mantua Hall	Electrical Capital Work	Electrical Upgrades (PAPMC)	$100,000.00
Mill Creek	New Development	Neighborhood Revitalization - Scattered Site Comprehensive Rehabilitation (MC Extension)	$2,000,000.00
Morton Homes	Electrical Capital Work	Remove/Replace all subpanels; remove/replace main electrical distribution panel; remove/replace existing electrical EMT conduit and cable	$1,500,000.00
Morton Homes	Energy Efficiency Upgrades	Better Building Challenge - Energy Efficiency Upgrade including weatherization & insulation	$2,546,931.00
Morton Homes	Morton Homes Renovations	Physical Needs Assessment (PNA) priority and REAC site repairs / unit repairs	$12,840,000.00
Mount Olivet	Civil Capital Work	Exterior Envelope and Moisture Protection	$500,000.00
Norman Blumberg	Electrical Capital Work	Elevator Upgrades in Senior Tower (Modernization)	$1,700,000.00
Norman Blumberg	Blumberg	1st Floor Community Center Renovation at Senior Building including utility isolation	$2,100,000.00
Norman Blumberg	Civil Capital Work	Senior Tower Exterior Façade and Roof Repair	$683,749.00

SITE NAME	PROJECT	DESCRIPTION	ESTIMATED BUDGET
Norris	Development	Phase II (Marvine Street Tract) - New construction of 47 affordable housing rental units	$6,600,000.00
Oakdale Street Apartments	Oakdale	Oakdale 12 Units SS New Construction PBV PHA-Owned	$4,500,000.00
Oxford Jefferson	SS Carpentry	SS Carpentry	$21,714.00
Oxford Jefferson	SS Heating Upgrades	SS Heating Upgrades	$20,000.00
Oxford Jefferson	SS Concrete Repair	SS Concrete Repair	$86,743.00
Oxford Jefferson	SS Roofing	SS Roofing	$42,000.00
Oxford Jefferson	SS Painting	SS Painting	$30,000.00
Oxford Village	Oxford Village Renovations	Sanitary Upgrade	$3,650,000.00
Partnership	Third-Party Capital Requests	Funding for third-party development partnerships for "6 in 5 Initiative"	$5,000,000.00
PHA	Admin	New PHA HQ Office and Ridge Ave. Commercial Development	$40,000,000.00
PHA	Bartram Warehouse Expansion	5,000 sf expansion	$800,000.00
PHA WIDE	Conventional Fire Units	Conventional Fire Units Rehab	$1,200,000.00
PHA WIDE	Civil Capital Work	Civil - Repair and replacement of exterior fences, roof, asphalt and concrete at various sites.	$3,496,990.54
PHA WIDE	PHA Wide 504 Modifications	504 Unit Modifications/Fair Housing (Conventional & Scattered (901-910))	$900,000.00
PHA WIDE	Civil PNA Capital Work	Civil - Repair and replacement of exterior fences, roof, asphalt and concrete at various sites.	$2,598,213.81
PHA WIDE	Mechanical PNA Capital Work	Mechanical - HVAC Upgrades repair, replace or refurbish air conditioning units. Including chillers, roof top package units, window AC units, exhaust fans, DX split units at various sites	$1,250,595.12
PHA WIDE	PHA Wide 504 Modifications	504 Unit Modifications/Fair Housing (Conventional & Scattered (901-910))	$900,000.00
PHA WIDE	Electrical PNA Capital Work	Electrical - Repair replace / upgrade electrical systems and lighting	$1,525,992.00
PHA WIDE	Capital Improvements	REAC site repairs	$3,650,000.00
PHA WIDE	Energy Efficiency Upgrades	LED Site lighting upgrades	$250,000.00

SITE NAME	PROJECT	DESCRIPTION	ESTIMATED BUDGET
PHA WIDE	Mechanical PNA Capital Work	Plumbing - replacement of old and failing equipment integral to the sites with new ejector pumps, duplex sumps and sanitary piping at various sites.	$75,000.00
PHA WIDE	Electrical Capital Work	Electrical - Repair replace / upgrade electrical systems and lighting	$269,735.00
PHA WIDE SS	Service Order Expenditures - Painting	SS Painting	$300,000.00
PHA WIDE SS	SS Fire Units	SS Fire Units Rehab	$1,200,000.00
PHA WIDE SS	Service Order Expenditures - Heating Upgrade	Heating Upgrade	$300,000.00
PHA WIDE SS	Service Order Expenditures - Window	SS Window	$25,000.00
PHA WIDE SS	Service Order Expenditures - Concrete repair	Concrete repair	$600,000.00
PHA WIDE SS	Service Order Expenditures - SS Roofing	SS Roofing	$450,000.00
PHA WIDE SS	Service Order Expenditures - Carpentry	SS Carpentry	$250,000.00
PHA WIDE SS	Service Order Expenditures - Bathroom Upgrade	Bathroom Upgrade	$450,000.00
PHADC	New Development	PHADC Opportunity Neighborhoods: Scattered Site Development of Affordable Housing	$1,500,000.00
PHADC	New Development	19 Units Affordable SS	$4,000,000.00
PHADC	Development	1010-1012 South 20th - 6 Units (PHADC)	$300,000.00
Point Breeze	South Philadelphia Development	Development of approximately 20 units in Point Breeze area	$5,000,000.00
Promise Zone	Development	Promise Zone: BKLYN HTS (26), UNION HILL (10), WEST (53) - 89 units total	$5,000,000.00
Spring Garden	Mechanical Capital Work	Mechanical Upgrade for Underground and Building Distribution	$2,500,000.00
Strawberry Mansion	New Development	Strawberry Mansion Street Planning - New Construction of 67 Affordable Housing Units	$15,333,250.00
Strawberry Mansion	SS Roofing	SS Roofing	$162,000.00
Strawberry Mansion	SS Concrete Repair	SS Concrete Repair	$85,117.00
Strawberry Mansion	SS Carpentry	SS Carpentry	$18,920.00
Strawberry Mansion	SS Painting	SS Painting	$30,000.00

SITE NAME	PROJECT	DESCRIPTION	ESTIMATED BUDGET
Strawberry Mansion	SS Heating Upgrades	SS Heating Upgrades	$20,000.00
Susquehanna	SS Carpentry	SS Carpentry	$56,133.00
Susquehanna	SS Roofing	SS Roofing	$80,500.00
Susquehanna	SS Heating Upgrades	SS Heating Upgrades	$20,000.00
Susquehanna	SS Concrete Repair	SS Concrete Repair	$123,742.00
Susquehanna	SS Painting	SS Painting	$30,000.00
West Park Apartments	Civil Capital Work	Exterior Façade Inspection and Restoration	$688,000.00
West Park Apartments	Civil Capital Work	New trash compactors	$320,000.00
West Park Apartments	Civil Capital Work	Roof Covering	$100,000.00
West Park Apartments	Mechanical Capital Work	Mechanical Upgrades - Pipe Equipment Repair	$271,181.00
West Park Apartments	Energy Efficiency Upgrades	Survey, assess & repair/replace domestic controls & distribution of Heating Hot Water systems	$600,000.00
West Park Apartments	Civil Capital Work	Painting	$250,000.00
West Park Apartments	Mechanical PNA Capital Work	Provide automatic blow down systems for all steam boilers except B-1 & B-3 at West Park	$24,000.00
Wilson Park	Civil Capital Work	Exterior Façade Restoration	$3,069,111.00
Wilson Park	Electrical Capital Work	Emergency System Upgrade - For Emergency Generator and Lighting	$1,000,000.00
Wilson Park	Mechanical PNA Capital Work	Provide automatic blow down systems for all steam boilers except B-1 & B-3 at West Park	$24,000.00
Wilson Park	Mechanical PNA Capital Work	Test & Repair/Replace all steam traps	$150,000.00
Total			**$114,597,937.47**

B. Leasing Information

PHA's core business involves management and oversight of over 15,000 public housing units and 18,000 Housing Choice Vouchers:

- The Public Housing inventory includes units for families, seniors, and people with disabilities located at conventional and scattered site properties. It also includes properties managed by Alternatively Managed Entities (AMEs) and the Philadelphia Asset and Property Management Corporation (PAPMC). PHA's inventory includes some

units that are not available for occupancy because: (i) they have been approved for demolition or disposition but the demolition or disposition has not yet taken place; (ii) they have been scheduled for significant levels of modernization; (iii) they are utilized for administration or resident services purposes; or (iv) they are eligible for other HUD-authorized exclusions.

- The Housing Choice inventory changes from year to year and includes MTW tenant-based vouchers as well as vouchers authorized by HUD for special purposes such as the Veterans Affairs Supportive Housing Program, Family Unification Program, SRO Moderate Rehab and Mainstream programs. Periodically, HUD issues Enhanced Vouchers and Tenant Protection Vouchers for PHA to administer. As allowed by the MTW Agreement, PHA incorporates Enhanced and Tenant Protection Vouchers into the MTW block grant when eligible.

As required by HUD, Table 6 below provides information only on households living in "MTW units" that PHA plans to serve during FY 2016. This includes all households residing in PHA public housing units as well as HCV MTW households. Table 6A is provided for informational purposes, and includes only households projected to be served under the Non-MTW HUD Special Purpose Voucher program categories. The actual number of households served may vary.

Table 6: Planned Number of Households Served at End of FY 2016

MTW Households to be Served Through:	**Planned Number of Households to be Served**	**Planned Number of Unit Months Occupied/Leased**
Federal MTW Public Housing Units to be Leased	13,970	167,640
Federal MTW Voucher (HCV) Units to be Utilized*	17,500	210,000
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs	0	0
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs	0	0
Total Households Projected to be Served	**31,470**	**377,640**

Table 6A Non-MTW Voucher Programs: Planned Number of Households Served at End of FY 2016

Non-MTW Program	**Planned Number of Households to be Served**	**Planned Number of Units Months Occupied/Leased**
Mainstream	70	840
VASH	583	6,996
Moderate Rehab	247	2,964
SRO	332	3,984
Total Households Projected to be Served	**1,232**	**14,784**

Reporting Compliance with Statutory MTW Requirements

PHA is in compliance with its MTW statutory requirements.

Description of Anticipated Issues Related to Leasing

Public Housing Program - Actual leasing figures for public housing may be impacted by development and relocation timetables. While PHA believes that its leasing projections are sound, over the course of FY 2016, construction schedules may change as a result of unanticipated site conditions, weather-related issues, and other factors. This in turn may result in scheduling changes or delays in re-occupancy and relocation activity that may ultimately impact leasing levels.

C. Waiting List Information

PHA administers its waiting lists in accordance with the Housing Choice Voucher Program Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP) as applicable. Conventional Public Housing, scattered sites, PAPMC and AME sites are subject to site-specific waiting list policies. As of March 3, 2014 all waitlist processing activities for Conventional Sites and Scattered Sites Areas were centralized and are now the responsibility of the Public Housing Admissions Department. This change was made to ensure consistent and efficient management of applicants on the various waitlist.

PHA operates its waiting lists in a nondiscriminatory manner that seeks to avoid unintended discriminatory effects. PHA affirmatively markets its sites in a variety of venues and periodicals to ensure that the public is aware of the availability of PHA housing. PHA treats all applicants in a non-discriminatory manner. PHA also monitors its waiting lists to determine if there are significant changes in the percentage of protected classes and, if there were, would determine whether its affirmative marketing methods should be modified.

Table 7 provides information on PHA's waiting lists in the format required by HUD.

Table 7: Wait List Information Projected for Beginning of FY 2016

Housing Program(s)	Wait List Type	Number of Households on Wait List	Wait List Open, Partially Open or Closed	Are There Plans to Open the Wait List During the Fiscal Year
Public Housing 1	Other	27,500	Partially Open	No
Public Housing 2 (Tax Credit)	Site-Based Waiting List	35,000	Open	Waitlist is currently open
Housing Choice Voucher Program Tenant Based	Community-Wide	26,156	Partially Open	No

Information on Partially Open Wait Lists

Public Housing wait lists are currently only open to applicants that require wheelchair accessible units; applicants aged 55 and older; and applicants referred to PHA from external agencies with whom PHA has a referral agreement as described in the Admissions and Continued Occupancy Policy (i.e. Blueprint to End Homelessness and others).

The HCV wait list is closed except for applicants who qualify for admission under HUD's Special Purpose Voucher programs including VASH, as well as applicants referred to PHA from external agencies with whom PHA has a referral agreement as described in the Administrative Plan.

Description of "Other" Wait List Type

As specified in the Admissions and Continued Occupancy Policy, PHA's Public Housing wait list combines site-based, first available, and centrally managed wait list features. Public Housing developments have site-based waiting lists that were centralized and are now the responsibility of the Public Housing Admissions Department to manage. This change was made to ensure consistent and efficient management of applicants on the various waitlist. Applicants may select specific sites or "first available" unit citywide. Centrally managed waitlists are administered by the Admissions Department also including applicants that require a wheelchair accessible unit, and those with a preference designation such as the Blueprint program.

Planned Wait List Organizational or Policy Changes

The following is a summary of wait list policy/organizational changes planned for FY 2016:

- PHA will modify its existing rent policy to allow for the deduction of income received by students who are not heads of household but are participating in the PhillySEEDs sponsored internships.

- PHA will establish site-based wait lists for new developments that come online during the fiscal year in accordance with its Admissions and Continued Occupancy Policy.

- PHA will modify its Public Housing Admissions and Continued Occupancy Policy as needed to reflect proposed policy changes to the "6 in 5" program in order to align with the City's Office of Housing and Community Development and Pennsylvania Housing Finance Agency priorities for accessible and Special Needs units. Referrals for Special Needs units will be required to come from the City of Philadelphia's Deputy Mayor for Health and Opportunities Permanent Supportive Housing Clearinghouse, which shall act as PHA's Local Lead Agency as that term is used by the Pennsylvania Housing Finance Agency (PHFA). The Local Lead Agency is an agency that has (i) experience and responsibility in their jurisdiction for planning and assessing needs for one or more of the above referenced target populations; (ii) responsibility for funding services and organizing the service system to assure tenants get services they need in a timely and comprehensive manner; (iii) the capacity to manage a referral process consistent with fair housing laws; and (iv) be able to enter into an agreement with developers for referrals, pre-tenancy and post-tenancy services and supports. To be eligible for consideration

under PHA's ACC program, developers must meet the same definition of 'supportive housing' as required by PHFA, be targeting an eligible population, have an agreement with PHA's Local Lead Agency, and have easy access to transportation services.

- PHA is also evaluating implementation of new preferences that incorporate employment, educational, and/or job training requirements as a condition of occupancy for designated newly rehabilitated and/or constructed units. Seniors and people with disabilities will be exempt from employment requirements, if applicable. The policy will include provisions to address residents with temporary disabilities and/or temporary loss of employment. PHA may modify its Admissions and Continued Occupancy Policy in FY 2016, subject to Board approval, to reflect these new preferences. To the extent that any such modifications require MTW authority, PHA will establish appropriate MTW activities for HUD approval in future Plans.

III. PROPOSED MTW ACTIVITIES

PHA does not propose to establish any new MTW activities in FY 2016.

IV. APPROVED MTW ACTIVITIES

This section of the Annual Plan summarizes and provides a status update on MTW activities that have been previously approved by HUD. As required, this section also includes summary information on MTW activities that have been closed out or placed on hold by PHA. Initiatives are numbered to reflect the fiscal year in which the MTW was initially approved, i.e. MTW Activity 2011-1 was initially approved in FY 2011.

A. Implemented Activities

MTW Activity 2011-1: Partnership Programs Initiative

Description/Update: PHA uses its MTW authority to expand housing options and service models for special needs and other targeted groups in partnership with universities, state and local government, and other stakeholders. This flexible, services-oriented model builds on the previously approved Unit-Based Leasing and Development Program and allows PHA to leverage PHA and partner resources to provide housing options and, where appropriate and feasible, related health care, educational, and/or other necessary services to low-income families and individuals. Authorized features of the initiative include, but are not limited, to the following:

- Admissions and continued occupancy requirements for the initiative may vary from standard public housing or Section 8 requirements and will be determined for each project in order to promote seamless integration of the partner's subsidy sources with MTW block grant funds.
- Partnership initiatives must serve households earning 80% of AMI or below, and PHA's MTW funds may not be used to subsidize households who are not low-income.
- PHA will leverage its funds with other partner resources in order to avoid duplicative services and payments and to maximize the value of funds spent on the Partnership Initiative.
- Potential models include, but are not limited to, domiciliary care for seniors and people with disabilities, housing options for youth including those aging out of foster care, and supportive transitional housing.
- Budgets and agreements between PHA and its partners will adjust subsidy to allow for recoupment of PHA's capital investment as fee income where financially feasible, particularly in situations in which the partner's subsidy is intended to cover all or some housing costs.
- While each development is expected to have different features, programmatic components may include: preferences for specific target populations including referrals from partner agencies; program contracts for participants that may include requirements for case management, participation in services and other requirements; time limits on housing subsidies; modified occupancy standards; availability of stipends; and other components.

PHA projects that this initiative will result in the development of new housing and service delivery programs that address populations which have not been traditionally well-served by existing programs.

This activity was approved in FY 2011 and implemented in 2012 and subsequently modified in FY 2013 to incorporate specific components applicable to the youth aging out of foster care partnership with the Philadelphia Department of Human Services (DHS). In August 2012, PHA's Board approved a resolution authorizing PHA to enter into an MOU with DHS to create up to 50 housing opportunities to assist youth aging out of the foster care system. Three (3) participating youth have been housed in public housing units, and the plan is to evaluate their progress before proceeding with additional placements. In the FY 2014 Annual Plan, PHA discussed its intention to coordinate the Partnership Initiative activities with its new Affordable Future "6 in 5" Initiative.

Units will be primarily developed or acquired in a three-pronged approach including:

1) PHA acting as developer;

2) Preservation of affordable units, including those that are nearing the end of the LIHTC compliance period (in partnership with the Pennsylvania Housing Finance Agency) and other units; and

3) Open solicitation of development proposals.

An open solicitation is currently underway. Details on the unit types and financing will be finalized through negotiations with developer/sponsors, and may include use of PBV or ACC assistance, or other approaches. In FY 2016, PHA will also continue to explore other options to provide innovative housing and service options for targeted populations. As shown in Table 1, in FY 16, PHA will both self-develop new public housing units and partner with local non-profit organizations on developments that will include public housing and other units. For the Partnership Programs Initiative MTW activity, the following projects are projected to come on-line in FY16. Note, however, that actual schedules and unit counts may change based on a variety of factors including construction schedules, mixed finance approvals, other financing approvals and other factors. PHA will report on actual production in the Annual Report:

- **Impact Veterans Services Family Housing** - Impact Services Corporation will rehabilitate a vacant industrial building in the Kensington neighborhood of Philadelphia to create 26 permanent supportive housing units for families with a preference for veterans. PHA will provide up to $600,000 in MTW capital construction subsidy, 18 units of ACC operating subsidy and 8 units of project-based assistance under the UBV program. No other MTW waivers are required for the project at present. Total project cost is estimated at $9.07 million including Tax Credit equity and other sources. Supportive services will be provided.

- **New Courtland Apartments at Allegheny** – New Courtland Elder Services will build a 60 unit new construction development in North Philadelphia targeted for seniors. PHA

will provide ACC operating subsidy for 56 units. No other MTW waivers are required for the project at present. Total project cost is estimated at $16.125 million including Tax Credit equity and other sources. No PHA capital is involved in the project. Supportive services will be provided.

- **Saint Francis Villa Senior Housing –** Catholic Health Services will build a 40 unit new construction development in the Kensington neighborhood targeted for seniors. PHA will provide $1.8 million in MTW capital subsidy and ACC operating subsidy for 40 units. No other MTW waivers are required for the project at present. Total project cost is estimated at $12.36 million including Tax Credit equity and other sources. Supportive services will be provided.

Proposed Changes to Activity: No changes are proposed that require MTW authority.

However, PHA is clarifying its intention to make affordable future development selections in a manner that aligns with the accessibility and special needs housing priorities of the City's Office of Housing and Community Development and the Pennsylvania Housing Finance Agency. To the extent feasible and subject to PHA Board approval, new affordable rental housing development projects that are awarded PHA operating subsidies under the "6 in 5" program must meet the following set-aside requirements: ten percent (10%) Physical disability; four percent (4%) Hearing and Vision disability; and ten percent (10%) Special Needs.

Referrals to PHA and/or project owners for Special Needs units will come from the City of Philadelphia's Deputy Mayor for Health and Opportunities Permanent Supportive Housing Clearinghouse, which shall act as PHA's Local Lead Agency as that term is used by the Pennsylvania Housing Finance Agency (PHFA). The Local Lead Agency is an agency that has (i) experience and responsibility in their jurisdiction for planning and assessing needs for one or more of the above referenced target populations; (ii) responsibility for funding services and organizing the service system to assure tenants get services they need in a timely and comprehensive manner; (iii) the capacity to manage a referral process consistent with fair housing laws; and (iv) be able to enter into an agreement with developers for referrals, pre-tenancy and post-tenancy services and supports. To be eligible for consideration under PHA's ACC program, developers must meet the same definition of 'supportive housing' as required by PHFA, be targeting an eligible population, have an agreement with PHA's Local Lead Agency, and have easy access to transportation services.

Changes to Benchmarks, Baseline, Metrics: Under HUD's revised MTW reporting requirements, PHA is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity as approved in the FY 2015 Annual Plan. PHA will report on outcomes in the MTW Annual Report.

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	151 in FY 2016		

CE #4: Increase in Resources Leveraged – ALL Planned FY 2016 Projects

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	$0	$35.15 million		

CE #4: Increase in Resources Leveraged – St. Francis Villa

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	$0	$10.56 million		

CE #4: Increase in Resources Leveraged – IMPACT

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	$0	$8.47 million		

CE #4: Increase in Resources Leveraged - New Courtland at Allegheny

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	$0	$16.125 million		

** The HUD Standard Metrics for this activity will depend on the MTW flexibilities required and the type of service provided at each site. As additional agreements with service providers are finalized, further HUD Standard Metrics may be added depending on the terms and necessary flexibilities of the agreements. None of the listed projects for FY16 require MTW waivers at present other than the use of MTW Block Grant funds.*

MTW Activity 2004-1: Neighborhood Development and Revitalization Initiatives

Description/Update: PHA utilizes MTW authority to substantially increase housing choices for residents and applicants. PHA is continuing to implement an ambitious program of new construction, substantial rehabilitation, and modernization designed to revitalize PHA public housing developments, replace distressed housing lost to demolition and lack of capital funds, and improve Philadelphia's neighborhoods. To support its redevelopment activities, PHA continues to implement the following MTW components. These components support the Partnership Initiative and other MTW activities:

- **Design Standards** – PHA continues to implement reasonable and modest design standards for new construction and rehabilitation work that mirror current design trends and the 21st century needs of residents. Modified design standards take into account efficiencies in energy usage, construction methods and technologies, and use of interior and exterior space. PHA standards also incorporate modern amenities and the latest concepts in urban design in order to reduce the negative connotation of public housing for PHA residents and to enhance the livability and marketability of PHA's housing stock. This activity, approved and implemented in FY 2004, is ongoing.

- **Total Development Cost Limits and Housing Cost Caps** – PHA has established and maintains reasonable cost limits for development and redevelopment activities that replace HUD's Total Development Cost (TDC) limits and Housing Cost Caps (HCC). PHA's 2014 MTW TDC/HCC cost limits reflect all the costs associated with developing new PHA conventional and scattered sites and rehabilitating existing units in these categories. PHA cost limits address current construction practice costs while incorporating energy efficient and environmentally sound equipment and materials used in the building process. They support the development of accessibility features in units and throughout the development. In addition, the establishment of new cost limits takes into account the market trends in construction and union labor rates, Davis Bacon rates, and costs associated with government contract work versus private market contract work. The cost limits incorporate the cost of modern design amenities to improve PHA's marketability. PHA's most recently updated MTW TDC and HCC cost limits as of 2014, along with information on the methodology used to establish these cost limits, are attached as Appendix D for informational purposes. Per discussion with HUD, the 2014 MTW TDC/HCC cost limits will be reviewed and approved by HUD either as a technical amendment to the FY 2016 Plan or as part of the FY 2017 Annual Plan approval process. This activity was approved and implemented in FY 2004.

  PHA has completed its negotiations with its various construction trades unions to develop a project labor agreement aimed at establishing an affordable housing construction/rehab wage rates as well as work rules to improve efficiency and reduce costs. This agreement is being reviewed by DOL/HUD. PHA is presently and will continue to remain in compliance with applicable Davis-Bacon provisions.

- **Streamlined Mixed-Finance Development Process** – PHA is authorized to develop public housing through several financing methods, including the mixed-finance approach, which involves the use of private financing, Housing Choice Vouchers, and public

housing development funds. According to public housing regulations, PHA and its partners may select among several ownership structures for mixed-finance transactions. These structures may include total private ownership, where PHA does not hold an ownership interest; total ownership by PHA; or a mixture of partial ownership by PHA and its partners. The various arrangements may necessitate different documents, especially for those transactions with third party-developers/owners for which PHA will provide capital or ACC subsidy only. These mixed finance developments may consist of all public housing units or a mixture of public housing and market rate or non-public housing rental and homeownership units. This activity was approved and implemented in FY 2004 and is ongoing.

- **MTW Site and Neighborhood Standards** – PHA is authorized to implement alternate Site and Neighborhood Standards for its public housing and voucher programs, in lieu of those standards at 24 CFR § 941.202(b)-(d) and 24 CFR 983.57. PHA continues to use these standards for determining the location of existing, newly constructed, or substantially rehabilitated housing that receives MTW subsidy. This activity was approved and implemented in FY 2004 and is ongoing.

- **Streamlined Acquisition Process** – Subject to the provisions of the MTW Agreement, PHA is authorized to acquire sites without prior HUD approval, provided that the agency certifies that HUD site selection requirements have been met. Accordingly, PHA has established a public housing acquisition process as part of its streamlined mixed-finance process agreed to by HUD. This activity was approved and implemented in FY 2002. PHA recognizes that the foregoing authorization does not exempt the housing authority from environmental approvals or other approvals required outside of the U.S. Housing Act of 1937, as amended. PHA also acknowledges that it needs to identify any planned acquisitions in the MTW Annual Plan and to report on actual acquisitions in the MTW Annual Report.

- **Strategy for Development**: PHA has adopted a Development-Asset Management Strategy for Public Housing that takes a comprehensive neighborhood-by-neighborhood and block-by-block approach to redeveloping, consolidating, rehabilitating, demolishing, and acquiring and disposing of scattered site units independently and in partnership with government and other local neighborhood-based organizations. This activity was approved and implemented in FY 2005 and it is ongoing. As appropriate, PHA's new Development Principles will be used to guide all future development efforts.

Proposed Changes to Activity: No changes are proposed.

Changes to Benchmarks, Baseline, and Metrics: Under HUD's revised MTW reporting requirements, PHA is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity as approved in the FY 2015 Annual Plan. PHA will report on outcomes in the MTW Annual Report.

CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	TBD	TBD		

**HUD is requiring the use of this metric; however, PHA does not believe it is applicable in this context of this MTW activity. PHA will identify the current baseline as part of the FY 16 Annual Report and then establish a benchmark of maintaining this level going forward, i.e. PHA would not anticipate an increase in Agency Cost Savings.*

CE #2: Staff Time Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	TBD	TBD		

**HUD is requiring the use of this metric; however, PHA does not believe it is applicable in this context of this MTW activity. PHA will identify the current baseline as part of the FY 16 Annual Report and then establish a benchmark of maintaining this level going forward, i.e. PHA would not anticipate a change in staff time savings.*

CE #3: Decrease in Error Rate of Task Execution

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	0	0		

**HUD is requiring the use of this metric; however, PHA does not believe it is applicable in this context of this MTW activity. PHA will identify the current baseline as part of the FY 16 Annual Report and then establish a benchmark of maintaining this level going forward, i.e. PHA would not anticipate a change in error rate.*

CE #4: Increase in Resources Leveraged- ALL Planned FY 2016 Projects

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	$0	$ 20.4 million		

CE #4: Increase in Resources Leveraged- Blumberg Phase I

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	$0	$ 12.7 million*		

**Projected LIHTC 9% equity leverage for Phase I Blumberg development.*

CE #4: Increase in Resources Leveraged- Queen Lane

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	$0	$ 7.7 million*		

**Projected LIHTC 4% equity leverage of 7.7 million for Queen Lane development .*

CE #4: Increase in Resources Leveraged- Queen Row

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	$0	$ 0		

CE #4: Increase in Resources Leveraged- Markoe

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	$0	$ 0		

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	142 in FY 2016		

HC #2: Units of Housing Preserved

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0	0		

HC #3: Decrease in Wait List Time

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	TBD - Average applicant time on wait list prior to implementation of the activity (in months).	TBD - Expected average applicant time on wait list after implementation of the activity (in months).		

HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	142 units in FY 2016		

MTW 2004-2: Service-Enriched Housing for Seniors and People with Disabilities

Description/Update: PHA is collaborating with the Commonwealth of Pennsylvania and other local providers to develop and implement a range of service-enriched housing options for seniors and people with disabilities, including the following ongoing and planned program components:

- **Adult Day Care –** Adult Day Care provides non-medical supportive day services to eligible elderly persons. Adult Day Care includes assistance with activities of daily living, medication reminders, social activities, meals and snacks, and educational programs. An affiliate – Elderly and Disabled Services, LLC - administers the Adult Day Care program services. The first Adult Day Services facility is located at the Nellie Reynolds Gardens senior housing development. Both PHA residents and neighborhood residents are eligible to participate in the program. This activity was first approved and implemented in FY 2011. The facility opened in 2010. PHA plans to issue a Request for Proposals in FY 2016 in search of an operator for its Adult Day Care and Disabled Resident Homes known as the Quad Facilities.

- **Nursing Home Transition** – The Nursing Home Transition Initiative (NHTI) is a partnership with the Department of Public Welfare (DPW) that assists persons transitioning out of nursing homes with accessing affordable housing. As part of NHTI, PHA administers seventy-five (75) State-supported vouchers for referrals of disabled consumers in need of low-income housing. NHTI households may be eligible for a preference for public housing or HCV. In addition, PHA has entered into a Memorandum of Understanding (MOU) with Liberty Resources, Inc. to refer to PHA disabled households who may be eligible for a preference for public housing or HCV. PHA utilizes its MTW flexibility to increase HCV payment standards up to 120% of the HUD Fair Market Rents in order to secure housing, subject to rent reasonableness. This activity was first approved and implemented in FY 2010 and is ongoing.

- **Definition of Elderly –** An elderly person is defined as an individual who is at least 55 years old. An elderly family is defined as one with a head of household, co-head, spouse or sole member who is at least 55 years old. For the purposes of admission to public housing designated as elderly-only, the definition of *elderly* and *elderly family* for each designated project will be specified in PHA's Designated Housing Plan in effect and may differ from the foregoing definition. This activity was first approved and implemented in FY 2004 and is ongoing.

Proposed Changes to Activity: PHA completed retrofitting of accessible units required under Attachment E of the MTW Agreement; thus, this activity has been reclassified as "completed" and moved to the relevant section of the Annual Plan. No other changes are proposed.

Changes to Benchmarks, Baseline, Metrics: Under HUD's revised MTW reporting requirements, PHA is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity as approved in the FY 2015 Annual Plan. PHA will report on outcomes in the MTW Annual Report.

HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 – Nursing Home Transition (NHT)	75 ongoing (NHT)		

HC #7: Households Assisted by Services that Increase Housing Choice (Adult Day Care and Nursing Home Transition)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0 – Nursing Home Transition (NHT)	75 ongoing (NHT)		

MTW Activity 2004-3: Simplification and Streamlining of Rent and Recertification Processes for Public Housing and HCV

Description/Update: PHA is implementing a series of initiatives in the public housing and/or HCV programs designed to simplify rent calculation and the recertification, streamline administrative processes, and reduce paperwork burdens on residents and staff. The following is a summary of ongoing and planned program components:

- **Two and Three-Year Recertification** – PHA has restructured the annual and interim review processes and procedures for public housing and HCV to require recertifications every two years, except for public housing residents choosing ceiling rents who are recertified every three years. Generally, residents are not required to report changes in income between regularly scheduled recertifications. Interim recertification is required for changes in household composition. Additionally, PHA will complete EIV checks every six months for households with zero, temporary or sporadic income. Interim recertifications are restricted to one every six months; however, see proposed change below for HCV interim recertifications. Elderly and disabled households are exempted from this restriction on interim recertifications. As noted in the FY 2015 Annual Plan, the PHA Board of Commissioners approved a change to the Two and Three Year Recertification activity for the HCV program. Under this policy, HCV participants may request up to two (2) voluntary interim recertifications between regular recertifications. PHA may elect to adopt a similar policy in its public housing program subject to Board approval. This activity was approved and implemented in FY 2004 and is ongoing.

- **Ceiling Rents** – PHA has established ceiling rents for its public housing developments, which are periodically updated. This activity was approved and implemented in FY 2004 and is ongoing. Ceiling rents for sites managed by PAPMC are set at the Pennsylvania Housing Finance Agency ceiling rent limits in effect for LIHTC properties. PHA implemented PHFA 40% ceiling rents at conventional and scattered sites effective as of July 1, 2013. Ceiling rents will be updated annually to reflect the then-current 40% PHFA ceiling rents. At PHA developments where tenants pay for some or all utilities, the applicable utility allowance may be applied to the ceiling rent, i.e. the ceiling rent amount may be offset by the applicable tenant-paid utility allowance amount. PHA tenants will continue to have the option of selecting either a ceiling rent or an income-based rent. PHA will apply the ceiling rent amount when it is less than the income-based rent calculation. Tenants who select an income-based rent will pay no more than 28% of adjusted income for rent. PHA may elect to phase-in rent increases to avoid serious financial hardship to residents if necessary.

- **Rent Calculation Method** – PHA has established an alternative rent structure for the HCV and public housing programs to motivate residents to work and accumulate savings. Note that residents living in LIHTC units are not subject to this system. Public housing residents may elect a ceiling rent in lieu of the income-based calculation method. PHA's rent simplification system includes the following components: establishing a single working household deduction; modifying the definition of income to exclude the first $500 of asset income as well as certain medical-related insurance premiums; and

eliminating other deductions and reducing the standard rent calculation percentage based on family size. Minimum rents have been implemented in both the leased housing and public housing programs. This activity was approved and implemented in FY 2004 and is ongoing.

- **Payment Standards –** PHA has implemented a policy in the HCV program whereby the current payment standard is applied at regular recertification. This activity was implemented in FY 2008 and is ongoing.

- **Reasonable Rent** – PHA has developed and implemented a reasonable rent policy for the HCV program whereby reasonable rent determinations are completed at initial lease up, upon request for a rent increase, and at other times PHA deems it necessary to conduct a reasonable rent re-determination. This activity was approved and implemented in FY 2008 and is ongoing.

  PHA may implement across-the-board rent increases or rent freezes for properties in the HCV program. When and if an across-the-board rent increase is awarded, PHA will complete a reasonable rent determination at the time of the next annual HQS inspection and apply applicable policies related to reasonable rent when and if the rent is not reasonable. This policy was approved and implemented in FY 2005.

- **Utility Allowances** – PHA is authorized to implement a revised utility allowance methodology that includes the following components: a) HCV participants who are responsible for paying gas heat and who are eligible to participate in the PGW Customer Responsibility Program (CRP) will have the gas portion of their utility allowances calculated using an alternative methodology. Participation in the PGW CRP program places a cap on the amount of money that eligible residents will be required to pay for their gas utility payments based on household income, not consumption. Utility allowance schedules are typically determined based on an analysis of the cost of reasonable consumption based on dwelling unit size/type. PHA will utilize the PGW CRP capped amount to calculate the gas allowance due to residents, except in those limited circumstances where the CRP amount exceeds PHA's gas utility allowance schedule. The alternative utility allowance amounts will be factored into the rent calculation, including the Total Tenant Payment calculation. With this change, residents will continue to have their Total Tenant Payment limited to no more than 28% of household income. PHA has received approval to implement this initiative in the public housing program; however, only HCV implementation has taken place to date; b) Utility allowances will be phased out for residents with incomes at or above 80% of Area Median Income; c) PHA will review and modify public housing utility schedules periodically based on an assessment of available HUD funding and the requirements of the MTW Agreement and Plan. PHA may apply the HUD-determined operating subsidy pro-ration factor to determine the actual utility schedule amounts. Revised utility allowances will be applied to a family's rent calculations at the next scheduled recertification after the allowance is adopted or at one time across all affected households. The approach taken will be at the discretion of PHA; and d) PHA will establish a minimum threshold of $20 for payment of utility allowance payments. PHA

will report on utility schedule updates in the MTW Annual Report. This activity was approved and implemented in FY 2009.

- PHA is also authorized to expand the utility allowance policy to require public housing and HCV tenants receiving either heat or electric utility allowances to enroll and participate in the PECO Customer Assistance Plan, LIHEAP and any other applicable programs that offer reduced rates, energy usage grants, or other financial incentives to low-income households. This activity was approved in FY 2011.

- Finally, using its MTW authority, PHA will periodically, at its discretion, review HCV utility allowance schedules to determine if adjustments are required. Annual updates will not be required. This activity was first approved in FY 2014.

PHA reviews and reevaluates the impact of its rent reform initiatives on an annual basis. Current MTW rent policies do not have an adverse impact on affordability as rent for residents of both public housing and HCV (MTW vouchers) is less than or equal to 28% of adjusted household income. Public housing residents also have the option to select a ceiling rent.

Proposed Changes to Activity: No changes are proposed.

Changes to Benchmarks, Baseline, Metrics: Under HUD's revised MTW reporting requirements, PHA is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity as approved in the FY 2015 Annual Plan. PHA will report on outcomes in the MTW Annual Report.

CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	$877,965 (based on 56,100 total estimated hours for above activities multiplied by an average $15.65 hourly rate)	$658,473 estimated total cost after implementation of above activities		

CE #2: Staff Time Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	56,100 hrs. estimated for above activities	42,075 hrs. (25% reduction estimated)		

CE #3: Decrease in Error Rate of Task Execution

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	TBD	TBD		

**PHA implemented its revised rent calculation method in 2004, and does not have historical data on rent calculation error rates at that time. PHA will identify the current baseline as part of the FY 16 Annual Report (which already reflects error rate reductions) and then establish a benchmark of maintaining this level going forward, i.e. PHA would not anticipate future reductions to error rates.*

CE #5: Increase in Agency Rental Revenue

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	$0	TBD		

SS #1: Increase in Household Income – HCV*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	The average earned income of households affected by this policy in FY 14 is $17,032.	The expected average earned income of households affected by this policy after implementation of the activity is $17,032.		

** Although this activity was implemented in FY 04, HUD has only recently required PHA to track the average earned income of households affected by this policy, therefore PHA has used data from FY 14 to determine the baseline. As this activity has been implemented and on-going for over 10 years, PHA expects the average earned income of households to remain stable. For additional information see HUD's Frequently Asked Questions About HUD Form 50900 dated September 13, 2013.*

SS #1: Increase in Household Income - Public Housing*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	The average earned income of households affected by this policy in FY 14 is $15,187.	The expected average earned income of households affected by this policy after implementation of the activity is $15,187.*		

** Although this activity was implemented in FY 04, HUD has only recently required PHA to track the average earned income of households affected by this policy, therefore PHA has used data from FY 14 to determine the baseline. As this activity has been implemented and on-going for over 10 years, PHA expects the average earned income of households to remain stable. For additional information see HUD's Frequently Asked Questions About HUD Form 50900 dated September 13, 2013.*

SS #3: Increase in Positive Outcomes in Employment Status

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed	4,725 (36%) of work-able heads of households had earned income as of March 31, 2014.	Increase the total of work-able heads of households earning an income as of the end of FY 16 to 4,820 (37%)		

* *The benchmark is contingent on the economy and opportunities available in the City of Philadelphia.*

SS #3: Increase in Positive Outcomes in Employment Status

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unemployed	8,282 (64%) work-able heads of households had no earned income as of March 31, 2014.	Decrease the total number of work-able heads of households not earning income as of the end of FY 2016 to 8,116 (62%).		

** Although this activity was implemented in FY 04, HUD has only recently required PHA to track the employment status of work-able heads of households affected by this policy, therefore PHA has used data from FY 14 to determine the baseline. As this activity has been implemented and on-going for over 10 years, PHA expects the employment status of work-able heads of household to remain stable. For additional information see HUD's Frequently Asked Questions About HUD Form 50900 dated September 13, 2013.*

SS #8: Households Transitioned to Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	0 households	72 households are expected to transition to self-sufficiency in FY 16.		

**For HCV, PHA defines a household that transitions to self-sufficiency as an HCV participant who exits the program as a result of being over-income or one that receives no HAP subsidy but still qualifies as program participants. For public housing, PHA defines a household that transitions to self-sufficiency as a public housing household whose income increased from a lower level to 80% or greater of Area Median Income.*

NOTE: PHA maintains that the above metrics do not accurately reflect the success of this activity as they do not account for unit/population turnover (i.e. households moving out and in over multiple years). The baselines set above reflect a snapshot in time and do not account for families leaving and being replaced by lower-income families resulting in the make-up of the benchmark populations being increasingly different over time.

MTW Activity 2004-4: Unit-Based Leasing and Development Program

Description/Update: Expanding the supply of affordable housing in Philadelphia continues to be a major objective of the PHA MTW Demonstration program. Under PHA's Unit-Based Leasing and Development Program ("UBV" or the "Unit-Based Program"), PHA negotiates contracts with for-profit and non-profit private sector housing providers for unit-basing PHA's local rent Subsidy using MTW block grant funds (Operating, Capital, HCV) based on property specific agreements. To date, PHA has selected Unit-Based Program for MTW HCV Funds participants through a competitive procurement process. This MTW initiative was approved and implemented in FY 2004.

PHA's Site Selection Standards for the UBV program will comply with the alternate Site and Neighborhood Standards described at Attachment C, Section D (7)(c) to PHA's MTW Agreement.

The rent to the owners participating in the UBV program funded with MTW HCV funds will not exceed the lowest of 110% of the applicable fair market rent, the reasonable rent, the rent requested by the owner or such other amount determined by PHA to be appropriate for the unit based upon the nature of the unit and the RFP from which the owner was selected. For example, in certain cases, PHA believes a shallower subsidy is more appropriate.

Unless part of its "shallow" subsidy UBV program, PHA will not attach or pay UBV assistance to units that are already receiving another form of subsidized housing operating assistance. With respect to a shallow subsidy UBV program, PHA will not attach or pay UBV assistance to units receiving another form of subsidized operating assistance if the UBV assistance would be duplicative or would otherwise over-subsidize the unit. PHA may determine the effect of subsidy on rent to owners and the duplication of subsidy or excessive subsidy, subject to the requirements regarding subsidy layering as set forth in the HUD Reform Act of 1989. PHA may unit-base up to 100 percent of the dwelling units in any UBV project or building.

PHA may select its own units for project-basing with UBV assistance without a competitive process. Pursuant to Attachment C, Section D (7)(a), PHA may unit-base assistance at properties other than public housing properties owned directly or indirectly by PHA, including those owned by PHA affiliates or instrumentalities. For purposes of this selection method, a property that may be unit-based may be a former public housing property that has been converted to HCV assistance. Pursuant to Attachment C, Section D (1)(f), under either the UBV program or the Partnership Initiatives, PHA may attach or pay UBV assistance using HCV MTW funds to unit types currently prohibited by standard Section 8 regulations including, but not limited, to shared living facilities. Such units must comply with applicable alternate MTW Site and Neighborhood Standards.

An owner of a unit assisted under the UBV program for MTW HCV funds may elect to receive referrals from PHA's waiting list or to use a site-based waiting list for selection of tenants for a site. For owners using a site-based waiting list, owners must refer families to PHA for eligibility screening.

The following table provides information on projects that are subsidized under this initiative as of the date of submission of the Plan. Additional projects that are projected to be under contract in FY 2016 are included in Table 3. PHA is in the process of determining whether renewals will be issued for a number of developments on the table below:

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract	Target Population	Supportive Services
1260 Housing	Columbus Property Management	Low rise apartments and row homes	Scattered sites	164	mental health/ chemical dependency	yes
1260 Housing	Columbus Property Management	Midrise apartments	Northeast Philadelphia	11	mental health/ chemical dependency	yes
Art Apartments	Pine lake Management Associates LP	Low rise apartments	West Philadelphia	30	families/very low income	no
Belmont Gardens	Sarah Allen Community Homes V L P	Low rise apartments	West Philadelphia	3	families/very low income	no
Bernice Elza	Peoples Emergency Center	Low rise apartments	West Philadelphia	6	emancipated teens/homeless	yes
Bethesda Project Bainbridge	Bethesda Project Inc	Low rise apartments	South Philadelphia	20	homeless	yes
Bethesda Project South	Bethesda Project Inc	Low rise apartments	Center City Philadelphia	4	homeless	yes
Bethesda Project Spruce	Bethesda Project Inc	Low rise apartments	Center City Philadelphia	13	homeless	yes
Boriquen	Borinquen Associates II Limited	Scattered Row homes	North Philadelphia	22	families/very low income	no
Brentwood Parkside	Brentwood Parkside Associates	High rise apartments	West Philadelphia	22	seniors/ families/very low income	no
Patriot House	Citizens Acting Together Can Help, Inc	Low rise apartments	South Philadelphia	15	homeless	yes
Chatham Court Apartments	Chatham Apts. Assoc. LP	Low rise apartments	West Philadelphia	18	families/very low income	no
Cloisters	Cloisters III Housing Partnership	Low rise apartments/ duplexes and row homes	West Philadelphia	18	homeless	yes
Diamond St Venture I	Diamond St Ventures	Scattered duplexes	North Philadelphia	14	families/very low income	no
Diamond St Venture II	Diamond St Ventures	Scattered duplexes	North Philadelphia	6	families/very low income	no
Diamond St Venture III	Diamond St Ventures	Scattered duplexes	North Philadelphia	17	families/very low income	no
Dignity	Community For Dignity & Fairness	Scattered row homes	Germantown/ Mt. Airy	10	women with children (domestic abuse)	yes
Dignity	Community For Dignity & Fairness	Scattered row homes	Logan (Northwest Philadelphia)	3	women with children (domestic abuse)	yes

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract	Target Population	Supportive Services
Dignity	Community For Dignity & Fairness	Scattered row homes	Mt. Airy	4	women with children (domestic abuse)	yes
Dignity	Community For Dignity & Fairness	Scattered row homes	Germantown/ Mt. Airy	11	women with children (domestic abuse)	yes
Dignity	Community For Dignity & Fairness	Scattered row homes	Germantown	16	women with children (domestic abuse)	yes
Dignity Boss	Community For Dignity & Fairness	Scattered row homes	Germantown/ Mt. Airy	8	women with children (domestic abuse)	yes
Dignity Nedro	Community For Dignity & Fairness	Low rise apartments	Logan (Northwest Philadelphia)	5	women with children (domestic abuse)	yes
Dunlap School Venture	Dunlap Management Partners LP	Low rise apartments	West Philadelphia	35	seniors	no
Edgewood Manor	Edgewood Manor Associates II Lap	Low rise apartments	North Philadelphia	33	families/very low income	no
Elders Place I	Penn Housing LLC	High rise apartments	Germantown	43	seniors	no
Elders Place II	Penn Housing LLC	Low rise apartments	Germantown	38	seniors	no
Fattah Homes I	PEOPLES EMERGENCY CENTER	Scattered Row homes	West Philadelphia	6	homeless	yes
Fourth St Access	Columbus Property Management	Row homes and triplexes	North Philadelphia	24	families/very low income	no
Freedom Village	Freedom Village LP	Low rise apartments	North Philadelphia	16	families/very low income	no
Gaudenzia Shelton Court	Gaudenzia Foundation Inc.	Triplex and low rise apartments	North Philadelphia	19	young women (chemical dependency)	yes
HELP Philadelphia II	HELP USA	Low rise apartments	West Philadelphia	50	transitional housing for women	yes
HELP USA (HELP PA Affordable Housing)	HELP USA	Row homes	West Philadelphia	14	Veterans	yes
Imani Homes	Imani Homes Limited Partnership	Row homes	West Philadelphia	24	families/very low income	no
Imani II	Peoples Emergency Center	Row homes	West Philadelphia	6	families/very low income	no
Imani III	Peoples Emergency Center	Row homes	West Philadelphia	6	families/very low income	no
Imani IV	Peoples Emergency Center	Row homes	West Philadelphia	8	families/very low income	no
Imani V	Peoples Emergency Center	Row homes	West Philadelphia	11	homeless	yes

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract	Target Population	Supportive Services
Inglis Apartments at Elmwood	Inglis House	Low Rise apartments and row homes	West Philadelphia	40	seniors and disabled	yes
Inglis Housing (Morris-Klein Apts)	Inglis House	High rise apartments	West Philadelphia	19	seniors and disabled	yes
Jannie's Place	Peoples Emergency Center	low rise apartments	West Philadelphia	6	homeless	yes
JBJ Homes	Project Home	Low rise apartments	Fairmount	15	alcohol dependency	yes
Kate's Place	Project Home	High rise apartments	Center City Philadelphia	30	homeless/ chemical dependency	yes
Hamill Mills	Lena St Associates	Low rise apartments	Germantown	40	seniors	no
Ascension Manor	Liberty Resources	Low rise apartments	North Philadelphia	3	disabled	yes
Praveen Chestnut	Liberty Resources	Low rise apartments	West Philadelphia	3	disabled	yes
LIH Walnut	ARCH VII - LIH Walnut Associates	Low rise apartments	West Philadelphia	14	families/very low income	no
Locust Towers	Magdim Towers INC	High rise	West Philadelphia	40	families/very low income	no
Monument Rd	Methodist Family Services of Philadelphia	Low rise apartments	West Philadelphia	11	emancipated teens/homeless	yes
Monument Mews	Monument Mews	Low Rise apartments and row homes	West Philadelphia	60	families/very low income	no
Mt. Vernon	Mt. Vernon LP	Low rise apartments	West Philadelphia	15	families/very low income	no
New Courtland Apts at Cliveden	New Courtland	High rise apartments	Germantown	32	seniors	no
NPCH - Community Building	NPCH Associates	Duplex apartments	North Philadelphia	16	families/very low income	no
Parkside 2000 Associates	Columbus Property Management	Scattered triplexes	West Philadelphia	8	families/very low income	no
Parkside 2000 Associates	Columbus Property Management	Scattered triplexes	West Philadelphia	42	families/very low income	no
Paseo Verdes	Transit Village Affordable Housing LP	Row homes	North Philadelphia	19	families/very low income	no
RBM	Peoples Emergency Center	Low rise apartments	West Philadelphia	9	homeless	yes
Powelton Heights	Columbus Property Management	Low rise apartments	West Philadelphia	30	seniors	no
Kate's Place	Project Home	High rise apartments	Center City Philadelphia	5	homeless/ chemical dependency	yes
Ray's Place	Project Home	Low rise apartments	North Philadelphia	17	mental health/ veterans	yes
Regent Terrace	Regent Terrace Housing Partnership	Low rise apartments	West Philadelphia	80	families/very low income	no
Sarah Allen	Sarah Allen Community Home IV LP	Low rise apartments	West Philadelphia	3	seniors	no

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract	Target Population	Supportive Services
Sartain School Apartments	Sartain Management Partners LP	Low rise apartments	North Philadelphia	35	seniors	no
Sedgley Apartments	MPB School Apartments LP	Low rise apartments	North Philadelphia	16	families/very low income	no
Sheila D Brown Women's Center	Sheila D Brown Women's Center	Low rise apartments	South Philadelphia	9	women/ behavioral disabilities	yes
South 55th St	South 55th Street L.P.	Duplex apartments	West Philadelphia	18	families/very low income	no
Lehigh Park	St Christopher's Associates L P VIII	High rise apartments	North Philadelphia	25	families/self sufficiency	yes
Susquehanna Apartments	Susquehanna Apts LP	Low rise apartments	North Philadelphia	47	families/very low income	no
Temple N 16th St	Columbus Property Management	Low rise apartments	North Philadelphia	49	families/very low income	no
Temple N Gratz St	Columbus Property Management	Low rise apartments	North Philadelphia	40	families/very low income	no
Walnut Park	Walnut Park Associates LLC	High rise apartments	West Philadelphia	224	seniors	no
Walnut Thompson	Walnut-Thompson LP	High rise and duplex apartments	Center City and West Philadelphia	35	families/very low income	no
WCRP	Women's Community Revitalization Project	Row homes	North Philadelphia	16	families/very low income	yes
WCRP	Women's Community Revitalization Project	Row homes	North Philadelphia	38	families/very low income	yes
WCRP	Women's Community Revitalization Project	Row homes	North Philadelphia	32	families/very low income	yes
WCRP	Women's Community Revitalization Project	Row homes	North Philadelphia	12	families/very low income	yes
TOTAL				**1,926**		

A family residing in a UBV unit funded with MTW HCV funds may terminate the lease at any time after the initial term. The family must give advance written notice to the owner in accordance with the lease and provide a copy of such notice to PHA. Once a family terminates the lease, the family will no longer be part of the HCV or UBV program. Pursuant to PHA's MTW authority, PHA does not provide UBV participant families who want to move with tenant-based assistance with a tenant-based HCV voucher.

For mixed-finance closings for UBV units involving new public housing units, PHA may request HUD review and approval of certain waivers to current public housing regulations in the interest of increasing housing choice, promoting long-term project viability, and encouraging more third party development. Specific waivers that may be requested include:

- PHA may elect to allow the owner of UBV units, including PHA if it is the owner, to utilize public housing operating subsidy and other MTW funds, to pay for debt service associated with the UBV development; and
- Where PHA provides public housing operating subsidy as part of UBV assistance, separately or in combination with voucher or other MTW funds, PHA may have the Declaration of Restrictive Covenants modified to eliminate or change the standard ten-year affordability "tail,"

While the above waivers do not require MTW authority, they are directly relevant to the Unit Based Leasing and Development and Partnership Initiative activities. PHA is providing this information in the MTW Annual Plan to clarify its intention to seek future HUD waivers. The specific details of each UBV agreement will be defined prior to closing and shall be subject to HUD review and approval, where applicable, as part of the mixed-finance transaction closing process.

In FY 2016, PHA will continue to operate this program including, as appropriate, incorporating it into the "6 in 5" Initiative to create 6,000 units of affordable housing over a five-year period as referenced above. PHA may also issue requests for proposals for this initiative during the Plan Year.

Proposed Changes to Activity: No changes are proposed.

Changes to Benchmarks, Baseline, Metrics: Under HUD's revised MTW reporting requirements, PHA is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity as approved in the FY 2015 Annual Plan. PHA will report on outcomes in the MTW Annual Report.

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 units	267 units at the end of FY 2016*		

** HUD requires this metric track only newly constructed and/or rehabilitated units that were put under HAP Contract during the Plan year.*

HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	2,277 households will be able to move to a better unit and/or neighborhood of opportunity by the end of FY 16.		

HC #7: Households Assisted by Services that Increase Housing Choice

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0 households	TBD*		

**HUD is requiring the use of this metric; however, PHA does not believe it is applicable in this context of this MTW activity. PHA will identify the current baseline as part of the FY 15 Annual Report and then establish a benchmark of maintaining this level going forward, i.e. PHA would not anticipate an increase in households assisted by services that increase housing choice.*

MTW Activity 2005-2: Streamline the Admissions and Transfer Process

Description/Update: PHA has established a number of MTW policies designed to streamline the admissions and transfer policies for both Public Housing and HCV Programs:

- **MTW Transfers** – PHA may authorize a limited number of split-family transfers from Public Housing to the Housing Choice Voucher Program and vice versa. These transfers are referred to as MTW transfers. PHA provides for up to 50 Housing Choice Vouchers and 50 PH units to be transferred back and forth between PH and the HCV program. No more than 100 moves are authorized per fiscal year. Eligibility is determined by PHA Senior Management on a case-by-case basis, based upon immediate need, disability needs and availability of vouchers or public housing units. Transfers are used to support witness protection activities, domestic violence prevention, and other needs. If a resident transfers from Public Housing to the Housing Choice Voucher program, that resident will be subject to HCV eligibility guidelines. This activity was approved and implemented in FY 2005 and is ongoing.

- **HCV Waiting List –** Once a family is leased under the HCV Program, the family may remain on the waiting lists for Tax Credit and Public Housing sites. Additionally, PHA may require that the family sign an agreement whereby the family acknowledges they will not be eligible for selection from the Tax Credit or Public Housing site waiting lists until the initial lease term has been completed. If the family's name comes to the top of the Tax Credit or Public Housing site waiting lists prior to completion of the initial lease term, the family will be skipped; however, they will retain their position on the waiting list. The family will be selected from the Tax Credit or Public Housing site waiting list when they have completed their initial lease term and a vacant unit is available. Additionally, the family will be subject to all applicable program screening and eligibility requirements. This initiative was approved as modified and implemented in FY 2012.

- **Public Housing Waiting List –** Once a family is housed in public housing, the family will be removed from all other scattered site and conventional PH waiting lists. However, a family may remain on the HCV and/or Tax Credit Site waiting lists. Additionally, PHA may require that the family sign an agreement whereby the family acknowledges that their name will be removed from all other scattered site and conventional PH waiting lists and they will not be eligible for selection from the HCV and/or Tax Credit Site waiting lists until the initial lease term has been completed. If the family's name comes to the top of the HCV and/or Tax Credit Site waiting lists prior to completion of the initial lease term, the family will be skipped; however, they will retain their position on the waiting list(s). The family will be selected from the HCV and/or Tax Credit Site waiting lists when they have completed their initial lease term and either a voucher or vacant unit is available. Additionally, the family will be subject to all applicable program screening and eligibility requirements. Applicants, as a reasonable accommodation, may request that their name remain on waiting lists once housed, and PHA, on a case-by case basis, will review these requests in order to accommodate the needs of a person with disabilities. This initiative was approved as modified and implemented in FY 2012.

Proposed Changes to Activity: No changes are proposed.

Changes to Benchmarks, Baseline, Metrics: Under HUD's revised MTW reporting requirements, PHA is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity as approved in the FY 2015 Annual Plan. PHA will report on outcomes in the MTW Annual Report.

HC #3: Decrease in Wait List Time – MTW Transfers

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	TBD - Average applicant time on wait list prior to implementation of the activity (in months).	TBD - Expected average applicant time on wait list after implementation of the activity (in months).		

HC #5: Increase in Resident Mobility- MTW Transfers

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	0	25 (estimate based on recent history with MTW Transfer activity)		

CE #1: Agency Cost Savings – MTW Transfers

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	0	0		

CE #2: Staff Time Savings – HCV and Public Housing Waiting Lists

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	0	0		

MTW Activity 2005-3: HCV Program Efficiencies

Description/Update: PHA is implementing additional efficiencies in the HCV Program designed to simplify processing and streamline administrative processes. The following is a summary of ongoing program components:

- **Moving to Work Family Agreement Addendum (MTWFAA) –** PHA has implemented a requirement for all HCV participants to sign a MTWFAA as a condition for approval of tenancy and continued occupancy. By signing the MTWFAA, participants agree to comply with all of the rules and regulations of PHA's Housing Choice Voucher Program, including the MTW-related terms and conditions described in the MTWFAA. Failure to abide by the HCV Program rules and regulations and terms and conditions of the MTWFAA may result in termination from the HCV Program. This is an efficiency measure which ensures that participants have full and accurate information on participant responsibilities at the time of entry to the program. This activity was implemented in FY 2004 and is ongoing.

- **Restriction on Elective Moves** – PHA policy regarding moves during the initial lease term and at the time of biennial recertification pertains to moves both within PHA's jurisdictions and initial moves outside of PHA's jurisdiction. Families are not permitted to move within PHA's jurisdiction during the initial term of assisted occupancy. The CEO or designee must approve exceptions to this policy. Subsequent to the initial lease term, families are permitted to move only at the time of biennial recertification or under extenuating circumstances as defined in the Administrative Plan subject to PHA management approval. Examples of extenuating circumstances include approved and documented VAWA or reasonable accommodation move requests. PHA may deny permission to move if the family violates HCV Program obligations and/or owes PHA money. This activity was approved and implemented in FY 2008 and is ongoing.

- **Criteria for Portability Moves** – PHA has established criteria for all port out moves. The criteria requires that MTW voucher participants requesting to port out provide a verified employment, education, safety, or medical/disability need to support their move to another jurisdiction. Families who are unable to provide a verified "employment, education, safety, or medical/disability need" will not be permitted to port out. PHA has established verification requirements to validate the family's employment, education, safety, or medical/disability need. If a voucher participant leases up within the City of Philadelphia, they are not permitted to port out during their initial lease term except for extenuating circumstances such as approved and documented VAWA or reasonable accommodation requests. Subsequent to their initial lease term, families may only move at the time of their biennial reexamination. Families with vouchers administered under the VASH program are not subject to this policy. This MTW activity only applies to MTW voucher participants whose initial voucher was issued by PHA or those who have subsequently been absorbed by PHA. This activity was first approved in FY 2013.

Proposed Changes to Activity: No changes are proposed.

Changes to Benchmarks, Baseline, Metrics: Under HUD's revised MTW reporting requirements, PHA is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity as approved in the FY 2015 Annual Plan. PHA will report on outcomes in the MTW Annual Report.

CE #1: Agency Cost Savings – MTW Family Addendum

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	$0*	$0		

**PHA implemented this activity in FY 2004 and does not have baseline information available for that period. PHA believes that the implementation of the MTW Family Addendum results in cost savings as a result of elimination of redundant staff time needed to review participant responsibilities multiple times. As this activity was implemented 10 years ago, no further agency cost savings are anticipated.*

CE #1: Agency Cost Savings – Restriction on Elective Moves

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	$25,259	$25,259		

**PHA implemented this activity in FY 2007 and does not have baseline cost information available for that period. See CE#2 below for this activity for estimate of staff time savings (in hours) already achieved. The benchmark for CE#1 agency costs savings is based on an average hourly labor rate of $15.65 times 1,614 labor hours.*

CE #1: Agency Cost Savings – Criteria for Portability Moves

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	$8,451*	$4,695		

**Cost savings are calculated based on the labor hours listed below in CE#2 times an hourly labor rate of $15.65.*

CE #2: Staff Time Savings – MTW Family Addendum

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	0*	0		

**PHA implemented this activity in FY 2004 and does not have baseline information available for that period. PHA believes that the implementation of the MTW Family Addendum results in elimination of redundant staff time needed to review participant responsibilities multiple times. As this activity was implemented 10 years ago, no further staff time savings are anticipated.*

CE #2: Staff Time Savings – Restriction on Elective Moves

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	1,614 hrs. (based on 1,291 moves in most recent fiscal year)*	1,614*		

**PHA implemented this activity in FY 2007 and does not have baseline information available for that period. Thus, the baseline reflects staff time savings already achieved. PHA has established a benchmark to continue the same or comparable level of staff time savings.*

CE #2: Staff Time Savings – Criteria for Portability Moves

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	540 hours (based on FY 12 port activity)	300 hours estimated		

MTW Activity 2016-1 Second Chance Initiative

Description/Update: PHA will use its MTW authority to support implementation of the Second Chance Housing Choice Voucher Pilot Program. PHA's Board of Commissioners approved this program in October 2013 by adoption of the Second Chance Housing Policy. The policy permits the provision of 10 tenant-based vouchers for active participants in good standing with two partner agencies – the Eastern District Federal Court Supervision to Aid Reentry (STAR) Program and the Mayor's Office of Reintegration Services (RISE) program. Housing assistance will only be available to the participants for a period of up to two years, at which point the participants will be required to transition off the program to other affordable housing. The STAR Program works in conjunction with Federal Probation and Parole, to offer returning citizens an opportunity to reduce their parole period by one year through participation in the Re-Entry Program. Each participant signs a contract with their parole officer to transition the oversight of their parole to the two federal Judges that administer the STAR program. The STAR program collaborates with the local RISE program to provide counseling, education, job training and job placement services.

The STAR program is designed to provide multiple levels of support to returning citizens at the family, social and logistical level to assist in preventing recidivism. Participants voluntarily participate in the closely-monitored program, wherein specific criteria have to be fulfilled at regular intervals. RISE is the lead agency in the City of Philadelphia for the management of reintegration services for those formerly incarcerated in state prisons. It provides the skills, training, and education necessary for returning citizens to successfully re-integrate into society, avoid recidivism, and lead constructive, useful lives. The STAR program is a national model for aiding federal offenders in their reentry to society in coordination with RISE.

One of the barriers to successful re-entry has been access to housing. Many of the past program participants struggled to maintain employment, continue their education or reunite with their kin because they could not secure a stable home. Many participants resided with family members, paramours or friends, and these environments, typically, did not support a positive reentry into society. Therefore, PHA in partnership with the STAR and RISE programs is piloting a program that provides access to stabilized housing through the voucher program.

Participants in good standing with RISE and STAR will sign an addendum to their PHA application to allow PHA to monitor their participation in the RISE and STAR programs and to communicate with their probation officer, if applicable. Participants will also report their participation in the vocational, educational, social or community service opportunities offered by PHA and/or RISE on a quarterly basis. The collaborative reporting and participant management across PHA, STAR and RISE will help ensure that participants stay on track, access services, be good tenants. If a participant does not remain in good standing with the STAR and RISE programs they risk a return to confinement and loss of the voucher. Participants who do not meet their program responsibilities will be notified of proposed voucher termination by PHA. They may request an informal hearing through PHA's existing process to review and appeal this decision. Vouchers will be time-limited; however, all other requirements of PHA's MTW tenant-based voucher program including tenant rent contribution will apply. At this point, PHA plans to conduct the pilot program for an initial two-year period with a limit of ten vouchers.

Prior to the end of the pilot period, PHA will determine whether to continue, discontinue or expand the program in consultation with partner agencies, and will discuss as appropriate in future MTW Annual Plans and Reports. PHA anticipates full implementation of this activity in FY 2016.

Proposed Changes to Activity: No changes are proposed.

Changes to Benchmarks, Baseline, Metrics: Under HUD's revised MTW reporting requirements, PHA is required to revise its MTW benchmarks, baseline, and metrics for consistency with the recently established HUD Standard Metrics. The table below provides the revised information for this MTW activity as approved in the FY 2015 Annual Plan. PHA will report on outcomes in the MTW Annual Report.

CE #4: Increase in Resources Leveraged

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	$0	Up to $10,000		

**Participation is not mandatory ,and is based on the needs of the individual*

HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	10 in FY 2016		

SS #1: Increase in Household Income

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	TBD – This is a new program. PHA will determine average earned income of participants following enrollment.	0 increase in earned income in FY 2016 based on enrollment timetable.		

SS #3: Increase in Positive Outcomes in Employment Status

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed Full-Time	10 program participants*	10 program participants in FY 2016		
	100% of program participants	100% of program participants in FY 2016		
Enrolled in a Job Training Program	0 program participants	5 program participants in FY 2016		
	0% of program participants	50% of program participants in FY 2016		
Enrolled in an Educational Program	0 program participants	5 program participants in FY 2016		
	0% of program participants	50% of program participants in FY 2016		

**All participants are required to be employed and maintain employment as a condition of participation; however, in the event they lose employment, they will be required to either obtain a new job or enroll in an educational or job training program as a condition of participation.*

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	TBD – This is a new program. PHA will determine the number of households receiving TANF following enrollment.	TBD – This is a new program. PHA will set a benchmark after determining how many participants receive TANF.		

SS #5: Households Assisted by Services that Increase Self-Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	0	10*		

**At this time PHA only has one family enrolled in the program, which will not effectively measure the success of the program to date. Increased enrollment will provide sufficient data to provide a clear picture of outcome.*

SS #6: Reducing Per Unit Subsidy Costs for Participating Households

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	TBD – This is a new program. PHA will determine the average amount of Section 8 subsidy per household following enrollment.	TBD – This is a new program. PHA will set a benchmark after determining the average amount of Section 8 subsidy per household.		

SS #7: Increase in Agency Rental Revenue

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase).	TBD – This is a new program. PHA will determine the agency rental revenue following enrollment.	TBD – This is a new program. PHA will set a benchmark after determining the baseline agency rental revenue.		

SS #8: Households Transitioned to Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). For this program purpose, PHA defines "self-sufficiency" as successfully completing the program and transitioning to other affordable housing.	0	0 in FY 16 based on program enrollment timetable		

B. Not Yet Implemented Activities

MTW Activity 2014-1: Flexible Subsidy Initiative

Description/Update: Through its affordable future "6 in 5" Initiative PHA intends to partner with qualified non-profit and for-profit developers to construct, rehabilitate, acquire, and/or preserve affordable rental housing, some of which may be public housing units. PHA has recently re-issued a Request for Proposals (RFP) to solicit developer proposals for this initiative. This activity was approved by the PHA Board and submitted to HUD for approval in late 2013 as part of a mid-year amendment to the MTW Annual Plan for FY 2014.

In order to promote the development and preservation of quality, affordable rental units that meet the diverse needs of low-income households, including special needs populations, PHA intends to utilize MTW flexibility in limited instances where the current public housing operating subsidy level (combined with projected tenant rental income) is inadequate to ensure the long-term viability of new public housing units to be developed and/or acquired under the affordable future initiative. Under this proposed MTW activity, PHA may elect to combine public housing operating subsidy with other MTW Block Grant funds to establish a local MTW flexible subsidy level higher than the standard public housing operating subsidy amount. PHA will only use such flexibility where the project otherwise meets PHA's stated development objectives, but is determined to be financially infeasible without the use of higher flexible subsidy funding allowable under MTW. HUD review and approval will be required for each transaction involving MTW flexible subsidies as part of the mixed-finance closing process pursuant to the Public Housing Capital Fund Program. (The Mixed-Finance Development and Public Housing Development requirements are incorporated into the final rule, and the existing Mixed-Finance Development and Public Housing Development requirements at 24 C.F.R. Part 941 are removed.)

In light of the fact that the current MTW Agreement will expire in 2018 unless extended by HUD, PHA acknowledges that funding from the MTW Block Grant may not be available to support the additional operating subsidy after that date. PHA also acknowledges that the blended subsidy initiative may impact its current and future Replacement Housing Factor funds.

PHA may also request HUD review and approval of additional waivers to current public housing regulations in the interest of increasing housing choice, promoting long-term project viability, and encouraging more affordable housing development. The following waivers do not specifically require MTW authority; however, PHA is providing this information to clarify its intentions with respect to seeking additional waivers. PHA may request the following additional non-MTW waivers from HUD as part of the review and approval process for public housing mixed-finance transactions:

- Allowing the owner of public housing units that are to receive flexible subsidy, including PHA if it is the owner, to utilize public housing operating subsidy and other MTW funds, to pay for debt service associated with the project; and

- Allowing for the modification or elimination of the standard ten-year affordability "tail" in the Declaration of Restrictive Covenants.

Based on its five-year goal, PHA projects that 300 additional affordable units that utilize flexible subsidy will be achieved over a five-year period from FY 2015 through FY 2019. PHA has projected that 50% of these units will be new or substantial rehabilitation units and the remaining 50% will be preservation units.

Proposed Changes to Activity: Create a new middle / mixed-income housing strategy in order to promote mixed-use, mixed-income communities anchored by affordable housing.

PHA recognizes the needs of Philadelphia are changing population. PHA is seeking to broaden the range of Philadelphian's who benefit from our affordable housing programs to include both the City's lowest income residents and the middle-income workers who increasingly cannot afford to move into the city. To promote long-term community revitalization and economic diversity, we will seek MTW authorization for programs that allows for the targeting of moderate income households and middle-income households. Middle-income housing is essential to support our economy and workforce, which increasingly cannot afford to live in our city.

Changes to Metrics, Baseline and Benchmarks: As part of its submission to HUD, PHA incorporated the following HUD standard metrics for this activity.

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0			

HC #2: Units of Housing Preserved

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0			

C. Activities on Hold

Not applicable.

D. Closed Out Activities

The following table summarizes previously approved MTW activities that PHA has completed, discontinued, or determined do not require MTW authority to implement.

Plan Year	Activity	Reason for Close Out	Close Out Year
FY 2011	Community Service Policy	Determination made that activity does not require MTW flexibility.	FY 2013
FY 2011	Expanding Use of LIHTC	Determination made that proposed activities were covered under Partnership and Unit-Based Leasing/Development Initiatives.	FY 2013
FY 2011	Scattered Site Income Tiering	PHA elected to discontinue this initiative prior to its implementation based on decisions made as part of the scattered site asset repositioning initiative including disposition and auction of vacant and obsolete properties.	FY 2011
FY 2010	Accessible Unit Retrofitting and Development	PHA has completed the accessible unit retrofitting under Attachment E of the MTW Agreement. PHA will continue to develop accessible units as part of its revitalization programs; however, this activity does not require specific MTW authority.	FY 2014
FY 2009	Assisted Living	PHA discontinued this activity prior to its implementation based on a determination that sufficient funding was not available from state, federal and other required sources.	FY 2011
FY 2009	Home Care Services	PHA discontinued this activity prior to its implementation based on a determination that services can be more efficiently delivered through third-party partners.	FY 2011
FY 2007	Transitional Housing Facilities	Determination made that comparable activities are authorized under Partnership Initiative.	FY 2013
FY 2007	LIFE Program	Determination made that activity does not require MTW flexibility.	FY 2013
FY 2005	Comprehensive Resident Self Sufficiency Services	PHA continues to provide comprehensive resident self-sufficiency services that utilize MTW Block Grant funds. However, no MTW programmatic waivers are required. These activities are now referenced in Chapter V under the Single Fund Flexibility section.	FY 2014
FY 2005	Voucher Issuance	PHA elected to discontinue this policy based on an assessment that it would not contribute to PHA's utilization goals.	FY 2014
FY 2004	HCV Time Limit	PHA discontinued this activity due to economic conditions which limited the availability of jobs for residents.	FY 2012
FY 2004	Family Economic Development Action Plan/Tenant Responsibility Training	PHA discontinued this activity along with discontinuation of HCV time limit as they were interrelated activities.	FY 2014
FY 2004	Tenant Responsibility Training	Determination made that activity does not require MTW flexibility.	FY 2013
FY 2004	Blueprint	PHA continues to implement the Blueprint Program; however, a determination was made that activity does not require MTW flexibility.	FY 2013
FY 2004	HCV HQS Enforcement	PHA elected to discontinue this policy based on a decision to establish uniform HQS enforcement policies for both MTW and Non-MTW vouchers.	FY 2012
FY 2004	Public Housing Service Order Policy	PHA elected to discontinue this policy after discussions with the HUD Field Office concerning the need to expedite service order response times.	FY 2012

V. MTW SOURCES AND USES OF FUNDING

A. Estimated Sources and Uses of MTW Funding for Fiscal Year 2016

Tables 8 and 9 below provides estimated sources and uses of MTW funds for FY 2016. As PHA's funding levels for future periods are unknown at the present time, this table provides preliminary projections. Actual sources and uses are expected to vary based on the level of funding provided to PHA and the level of actual expenses. PHA's estimated Sources and Uses budget for FY 2016 assumes continued reductions in Public Housing Operating Subsidy, Capital Fund Program, HCV, and HCV Administrative fees. The tables follow HUD's required formats and do not include information on Non-MTW funding sources and uses. See also Appendix E for additional RHF-related information as required by the RHF Amendment to the MTW Agreement.

Table 8: Estimated Sources of MTW Funding for FY 2016

Sources		
FDS Line Item	**FDS Line Item Name**	**Dollar Amount**
70500 (70300+70400)	Total Tenant Revenue	$25,487,700
70600	HUD PHA Operating Grants	$289,874,344
70610	Capital Grants	$41,234,400
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	$ 0
71100+72000	Interest Income	$115,000
71600	Gain or Loss on Sale of Capital Assets	$600,000
71200+71300+71310+71400+71500	Other Income	$500,000
70000	**Total Revenue**	**$357,811,444**

Table 9: Estimated Uses of MTW Funding for FY 2016

Uses		
FDS Line Item	**FDS Line Item Name**	**Dollar Amount**
91000 (91100+91200+91400+91500+91600+91700+ 91800+91900)	Total Operating – Administrative	$68,607,100
91300+91310+92000	Management Fee Expense	$ 0
91810	Allocated Overhead	$ 0
92500(92100+92200+92300+92400)	Total Tenant Services	$5,020,750
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	$25,644,000
93500+93700	Labor	$82,000
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$53,648,400
95000 (95100+95200+95300+95500)	Total Protective Services	$6,500,000
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$10,500,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	$14,500,000
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	$ 0
97100+97200	Total Extraordinary Maintenance	$4,000,000
97300+97350	Housing Assistance Payments + HAP Portability-In	$135,408,530
97400	Depreciation Expense	$33,900,664
97500+97600+97700+97800	All Other Expenses	$ 0
90000	**Total Expenses**	**$357,811,444**

B. Use of Single Fund Flexibility

Under the MTW Program, PHA is authorized to establish an MTW Block Grant budget. Activities that utilize Block Grant single fund flexibility are summarized below:

Capital Activities to support the security systems upgrades, asbestos abatement projects, and elevator repairs and site improvements throughout PHA.

Family Program and comprehensive resident supportive service activities to support a wide range of public safety, program compliance, and training and education efforts for PHA residents including: youth development programs citywide; senior programs citywide; Pre-Apprenticeship Program; service coordination; job training and placement; educational partnership initiatives; affordable homeownership programs; Community Relations police units; Community Partners training and educational programs; and other Economic Development and Self-Sufficiency program activities. A summary of PHA's MTW and Non-MTW funded resident services programs is found in Table 10.

Quality of Life Programs to support Lease Enforcement and Section 8 investigations programs.

General Conditions to include functional enhancements and training on software systems, staff training, and energy management initiatives.

Table 10: Residents Service Program Summary for FY 2016

Program	Program Description	Target Population	Funding Source	Number of Residents
Early Childhood Education Partnerships	Pre-School Partnerships to ensure 3 year olds are enrolled into area Head Start programs	Children 3 to 5	US Department of Health and Human Services	100
Summer Food	Breakfast and lunch served on site to provide appropriate nutrition during the summer.	Youth 5 to 18	PA Department of Education/ MTW	726
Summer Camp	Summer enrichment activities to prevent academic regression.	Youth Ages 6 to 13	MTW	400
Afterschool	On site programs which meet the standard of providing (1) homework assistance, (2) project based learning, (3) community service, and (4) physical/ body kinesthetic activities	Youth Ages 6 to 13	MTW	335
Computer Lab	Access to computer technology for academic enrichment.	Residents 6 to 70	MTW	500
PhillySEEDS Scholarship	Competitive scholarship awards based on academic achievement.	Youth/Adults 18 to 55	DHHS/Section 3 Vendors	35
Scholars Internship Program (SIP)	Paid internships in the major field of study of PHA's scholarship awardees.	Youth/Adults 18 to 55, who have received scholarships from PhillySeeds.	Section 3 Vendors	25
ABE/GED	Adult Basic Education and General Equivalency Diploma education in the required domains.	Residents 18 to 55	MTW	60
Community Partners	Occupational Skills training in career areas with reasonable growth potential.	Residents 18 to 55	MTW	100 enrolled
Health & Wellness Programs	With Every Heartbeat There is Life, with a tobacco component to improve nutrition, exercise	Residents 18 to 55	MTW	100 enrolled
Financial Literacy	Course on credit and money management to enable residents to purchase homes.	Residents 18 to 55	MTW	500 enrolled
Pre-Apprenticeship	Building Maintenance and	Residents 18 to 56	MTW/MOCS	20 enrolled

Program	Program Description	Target Population	Funding Source	Number of Residents
	Construction Training Program			
Home Ownership	Housing counseling about the home purchase process. This includes 5H, HCV, and Section 32.	Residents 18 to 55	US Department of Health and Human Services/ MTW	20 purchasing homes
ROSS	Assessment of individual and family needs, followed by referrals and tracking.	Residents 18 to 55	HUD	300
FSS	Assessment of individual and family needs, followed by referrals and tracking.	Residents 18 to 55	HUD	1000
Senior CTR/Programs	Evidence based activities, which reduce the number of seniors, who leave public housing to enter nursing homes.	Residents 55 and over	Philadelphia Corporation for Aging	300
CHSP	Meal program, which not only enable residents to have appropriate nutrition, but also best practice fellowship to support aging in place.	Residents 55 and over	HUD	13
Healthy Café	Kiosk to provide a 10% match for the congregate Housing Program.	Residents 55 and over	Resident purchases	13
Section 3	Ensure that economic opportunities, are provided to PHA residents	Residents 18 to 55	Private vendors that meet the Section 3 threshold	TBD by contract award
Adult Day/Elder Care	Multi-service center for residents, who can not complete activities of daily living.	Residents 55 and over	Commonwealth of PA/MTW	32

C. Local Asset Management Plan

Is the PHA allocating costs within statute? No, as allowed under the MTW Agreement.

Is the PHA implementing a local asset management plan (LAMP)? Yes.

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. It shall explain deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix? Yes

Pursuant to its MTW Agreement, PHA has developed a Local Asset Management Plan that describes the agency's cost allocation plan and other technical components of PHA's local asset management strategy. HUD approved initial PHA's Local Asset Management Plan as part of the MTW FY 2010 Annual Plan submission. A copy of the approved Plan is found in Appendix A.

VI. ADMINISTRATIVE

A. Resolution

A Resolution approving the FY 2016 MTW Annual Plan and the MTW Plan Certification of Compliance was adopted by the PHA Board of Commissioners at their December 2014 meeting following the public review process and public hearing. The Resolution is included in Appendix B.

B. Public Review Process

PHA provided public notice of the draft FY 2016 MTW Annual Plan and posted the draft Plan on its website. A public comment period to allow for resident and general public review was provided from November 17 – December 17, 2014. A public hearing (attended by 27 persons) was held on December 1, 2014 at the John F. Street Center, an accessible facility. PHA also conducted a discussion meeting with resident leadership (attended by 10 resident leaders) on November 25, 2014 to discuss Plan contents and provide additional opportunities for resident input. Prior to finalizing the Plan, PHA considered the comments received during the public review process.

C. Evaluations

PHA has established the Office of Policy, Research and Enterprise Planning (OPREP) which – among other duties – focuses on assisting PHA departments with developing and evaluating MTW initiatives. PHA is committed to both maximizing the use of MTW flexibility to promote MTW statutory objectives and PHA's goals, and sharpening the internal focus on monitoring and evaluating MTW outcomes.

D. Annual Statement/Performance and Evaluation Report

The Annual Statement/Performance and Evaluation Reports for all capital grants with unexpended amounts are included in Appendix F.

APPENDIX A – LOCAL ASSET MANAGEMENT PLAN

APPENDIX A – Local Asset Management Plan

Introduction

Pursuant to the First Amendment to the Moving to Work Agreement, in Fiscal Year 2010 (MTW Year Nine) the Philadelphia Housing Authority implemented a local asset management plan for its Public Housing Program as described herein. In the implementation of the plan, PHA adopted cost accounting and financial reporting methods that comply with OMB Circular A-87, OMB Circular A-133 and generally accepted accounting practices.

PHA's plan supports and is consistent with the agency's ongoing implementation of project based management, budgeting, accounting and financial management. PHA's project based management system emphasizes the provision of property management services that have met agency-wide standards while responding to the unique needs of each property. Day to day operations of PHA sites are coordinated and overseen by Asset Managers assigned to each property. PHA Asset Managers oversee the following management and maintenance tasks:

- Marketing and tenant selection
- Rent collections
- Routine and preventive maintenance
- Unit turnover
- Security
- Resident services
- Resident and community relations
- Capital improvements planning
- Other activities necessary to support the efficient operations of the site

In the implementation of these project level management activities, other PHA departments including Client Services, Public Safety, Maintenance, Development, ISM, Finance and Budget, Quality Assurance, and the Office of Strategic Management support PHA Asset Managers. Asset Managers are routinely provided with on-line detailed and summary management reports on budget status and all key performance indicators to facilitate their monitoring and oversight of property level activities. PHA also conducts multidisciplinary Performance Management meetings at quarterly intervals, to allow for a thorough review of key performance indicators at the individual site and system-wide levels.

PHA Asset Managers develop and monitor property budgets with support from the PHA Finance and Budget staff. Budget trainings are held annually to support the budget development process. Asset Managers are provided with tools to develop their budget estimates including property-specific non-utility and utility cost data from the prior 18 months.

PHA's local asset management plan is consistent with the principles of asset management described in 24 CFR 990.255 and in the First Amendment to PHA's MTW Agreement. Further, the plan is generally consistent with the provisions of 24 CFR 990.260, 990.265, 990.270, 990.275 and 990.285. As allowed under the First Amendment to the MTW Agreement, PHA's local asset management plan deviates from parts of 24 CFR 990.280, including requirements related to property management fees and fees for services. PHA will utilize the Cost Allocation method referenced in paragraph 6.F.4.b of the First Amendment.

Due to the unique features of the Philadelphia market, PHA's housing portfolio, and the agency, PHA has determined that use of the Cost Allocation method is the most efficient, cost-effective means of achieving the asset management principles referenced above. The factors that impact PHA's asset management plans include, but are not necessarily limited to, the following:

- Scattered Site Portfolio. PHA has over 4190 scattered site properties, which represents nearly 1/3 of its public housing portfolio. We understand this is far and away the largest scattered site public housing portfolio in the country. The geographic diversity of these scattered site units impacts warehouse operations, locations and numbers of management offices, and staffing requirements. The scattered site portfolio also includes a number of vacant lots, for which no HUD subsidy is received and for which a fee-based asset management approach could not be implemented. PHA has developed a strategy for reconfiguring this portfolio in a way that would be more cost-effective to operate which has been submitted to HUD for approval. Managing these sites presents unique challenges that PHA's asset management plans are structured to address.

- Aging Housing Stock. PHA operates one of the oldest public housing stocks in the country. It is more costly to operate than newer housing. PHA has engaged in an aggressive development program during the last few years to upgrade and redevelop its units. Due to a lack of adequate funds, this process is far from complete.

- Unionized Workforce. PHA has a heavily unionized workforce. Currently, PHA has contracts with approximately 11 unions. This significantly impacts the operations and costs of PHA's activities. As such, PHA's asset management plan is structured to be cost effective within the limits of these contracts.

- MTW Initiatives. Since the onset of its participation in MTW, PHA has sought to use its MTW flexibilities to implement agency-wide cost-cutting initiatives that will increase efficiencies, maximize use of federal dollars, and benefit PHA's clients. PHA has moved many functions to the site-based level, however a number of MTW initiatives require central administration so they can be adequately measured. For example, PHA has implemented innovative technological systems to maximize efficiencies in admissions, property management, and client services. There are costs associated with development and implementation of these systems before they are implemented at the site level. Under MTW, PHA has also implemented departmental

oversight protocols through its Quality Assurance Program. PHA's quality control program has already made PHA's programs more efficient by reducing errors and improving oversight.

- Local Costs. Philadelphia is an old, industrial city where labor costs for maintenance and construction activities are significant. These high costs can be attributed to, in part, prevailing wage requirements as well as the cost of materials and services in the Philadelphia market.

A description of the cost allocation plan and other technical components of PHA's local asset management plan to be applied in MTW Year 12 follow.

I. AMP Definitions

An AMP will include any site that receives Operating Subsidies through HUD's Operating Fund Calculation. PHA will have two types of PHA managed AMPs and PAPMC/AME managed AMPs. The revenue and expense allocations will be different for each type since PHA's revenues and expenses vary for each site. (APPENDIX 1)

II. Balance Sheet Items (Assets, Liabilities & Equity)

PHA has analyzed and distributed all balance sheet account items between the AMPs and the Indirect Cost Departments. PHA completed the balance sheet distribution by May 15, 2009 for presentation on the fiscal year ending March 31, 2009 financial statements. PHA submitted the Financial Data Schedule (FDS) for fiscal year ending March 31, 2009 in compliance with the Local Asset Management Plan on July 1, 2009. The FDS for the following fiscal years, March 31, 2010, and March 31, 2011 were also submitted in compliance with the Local Asset Management Plan.

A. Cash & Investments

PHA has distributed all reconciled cash for reporting purposes between the PHA Managed AMPs and the Indirect Cost Departments except for the cash related to the insurance settlement for Plymouth Hall and the investments related to PHASI. The cash and investments and the related liabilities were presented with the Plymouth Hall AMP and for PHASI with the Other Projects column of the FDS. Under the Special Instructions for preparing Financial Data Schedules for MTW Agencies as provided by HUD that PHA will be required to comply with for fiscal year ending March 31, 2010, PHA will report the PHASI activity in the MTW column. PHA has not created new physical cash accounts with the bank for each of the PHA Managed AMPs. PHA's accounting system can separate the cash accounts between the PHA Managed AMPs. All cash activity will be paid or received through one physical bank account, but on PHA's ledger, the cash activity will be posted to cash for the PHA Managed AMPs. When cash receipts are received, the cash receipts will post to each of the individual PHA Managed AMPs to the cash and proper offset account for the appropriate PHA Managed AMPs. Checks that are written for direct expenses will be charged to the appropriate PHA Managed AMPs expense account and cash.

PHA has elected to charge each site for allocated indirect overhead and frontline expenses rather than utilizing the fee for service model. PHA calculates the total expenses for the Indirect Cost Departments at the end of each fiscal year, and then allocates these expenses to each of the PHA Managed AMPS. PHA's accounting system allows PHA to establish this as an automated process.

Each fiscal year, investment income has been allocated between the PHA Managed AMPs and the Indirect Cost Departments based on cash balances from the end of the respective fiscal year.

B. Tenant Accounts Receivable and Allowance for Doubtful Accounts

At fiscal year ending March 31, 2011, PHA adjusted the tenant accounts receivable balances for each of the PHA Managed AMPs to the appropriate PHA Managed AMP based on the latest tenant ledgers from Emphasis. PHA's accounting policies recognizes the tenant accounts receivable balance as the outstanding balance from all tenants in possession of a unit plus the outstanding balances due from tenants that have vacated during the fiscal year. All other vacated tenant accounts receivable balances are written off at the end of each fiscal year after board approval. PHA's tenant ledger from the Emphasis system will provide PHA with the data to separate these amounts. PHA also adjusted the allowance for doubtful accounts at fiscal year ending March 31, 2011, so that the balances are distributed to the PHA Managed AMPs. PHA continues to reconcile the tenant accounts receivable balance at the end of each fiscal year to the tenant ledger by AMP and make the corresponding adjustments to the allowance for doubtful accounts by AMP.

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Tenant accounts receivable and allowance for doubtful accounts are included in the PHA Audited financial statements for each discretely presented component unit.

C. Other Accounts Receivable

Other accounts receivable will be distributed based on the purpose and source of the receivable. Receivables related to a PHA Managed AMP and PAPMC / AME Managed AMP will be distributed to the specific AMP. Any receivable that is not associated to a specific AMP will be distributed to the Indirect Cost Departments.

D. PHASI Assets and Liability / Worker's Compensation Liability

The PHASI and Worker's Compensation liabilities will remain with the Indirect Cost Departments. At this time, PHA has determined that these liabilities are PHA Agency Wide liabilities and not liabilities of the PHA Managed AMPs or the Indirect Cost Departments. However, PHA has utilized the LIPH (Fund 001) cash accounts in the past to pay most Agency Wide liabilities. Then, the LIPH (Fund 001) receives reimbursements from other programs where applicable. The expenses related to the

PHASI liability and worker's compensation liability will continue to be charged to appropriate programs or AMPs. PHA has created a cash reserve for each of these liabilities that have been funded over the years by all programs based on the allocation of salaries. The cash reserves offset PHA's liabilities so that each of the liabilities is fully funded. PHA utilizes the reserves to pay the liabilities as needed. PHA will review the treatment of these liabilities and corresponding cash reserves on an annual basis to confirm that its treatment is appropriate.

E. Prepaid Insurance

The prepaid insurance balances for the PHA Managed AMPs will be distributed to the correct AMP based on the allocation used to allocate the insurance expense.

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Prepaid insurance is included in the PHA Audited financial statements for each discretely presented component unit.

F. Materials Inventory

PHA implemented an e-procurement system that will streamline the purchasing process by connecting the site and support staffs' material needs directly to the vendor. This will allow the staff to order material as needed and receive materials only on an as needed basis. Currently, PHA has one warehouse, which is located on Bartram Avenue. The inventory at this site is used for routine maintenance needs at all of PHA's sites

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Materials inventory is included in the PHA audited financial statements for each discretely presented component unit.

G. Fixed assets and accumulated depreciation

Fixed assets and accumulated depreciation are reconciled to the PeopleSoft Asset Module and distributed to the appropriate PHA Managed AMPs and the Indirect Cost Departments. PHA has reviewed and analyzed all fixed assets and verified that the fixed assets and depreciation are charged to the appropriate PHA Managed AMP or Indirect Cost Department. PHA has identified the individual cost for each scattered site unit and has established each individual unit as an asset in the fixed asset module. PHA's Asset Module (AM) has been established for many years. AM provides PHA with the ability to prepare fixed asset and depreciation reports by AMP or department. AM tracks all of the fixed assets transactions and records all monthly fixed asset entries to the appropriate PHA Managed AMP or Indirect Cost Department.

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Fixed assets and accumulated depreciation are included in the PHA Audited financial statements for each discretely presented component unit.

H. Accounts Payable and Accrued Liabilities

Other accounts payable and accrued liabilities includes all liabilities not specifically referred to in the following detailed liability categories. Other accounts payable and accrued liabilities have been distributed based on the purpose and source of the payable or liability. Payables or liabilities related to a PHA Managed AMP and PAPMC / AME Managed AMP will be distributed to the specific AMP. Any payable or liability that is not associated to a specific AMP has been distributed to the Indirect Cost Departments.

I. Payroll Liabilities

All payroll liabilities will continue to be presented with the Indirect Cost Departments. At this time, PHA has determined that these liabilities are PHA Agency Wide liabilities and not liabilities of the PHA Managed AMPs or the Indirect Cost Departments. However, PHA has utilized the LIPH (Fund 001) cash accounts in the past to pay most Agency Wide liabilities. Then, the LIPH (Fund 001) receives reimbursements from other programs where applicable. The expenses related to the payroll liabilities will continue to be charged to appropriate programs or AMPs. PHA will continue to review the treatment of these liabilities on an annual basis to confirm that its treatment is appropriate.

J. Compensated Absences

Compensated absences liabilities will be distributed between the Indirect Cost Departments and the PHA Managed AMPs based on where payroll is charged. No compensated absences liabilities will be distributed to the PAPMC / AME AMPs because no payroll will be charged to those AMPs.

K. Equity

Equity has been reclassified based on the redistribution of all assets and liabilities. By definition, the Invested in Capital Assets equity balance will follow the Net Fixed Assets that are owned by an AMPs or Departments. Invested in capital assets will be distributed between the Indirect Cost Departments and the PHA Managed AMPs based on where the Net Fixed Assets amount is distributed

Based on the Special Instructions for Preparing Financial Data Schedules for Moving to Work Agencies, PHA will report all unrestricted net assets for the LIPH (Fund 001) program with the MTW column, CFDA #14.881. All unrestricted net asset balances for the PHA Managed AMPs will be adjusted to zero, and PHA will only provide each PHA Managed AMP with funding to operate the program. Any excess funding or operating profit or loss will be absorbed into the MTW program based on the principle that the MTW program is treated as a single funding source.

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Investments in capital assets are included in the PHA Audited financial

statements for each discretely presented component unit. Unrestricted net assets are included in the PHA Audited financial statements for each discretely presented component unit.

III. Revenues

A. Tenant Revenues

1. PHA Managed AMPs

Tenant Revenues will be directly charged to the appropriate AMP.

2. PAPMC/AME Managed AMPs

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Tenant revenue is included in the PHA Audited financial statements for each discretely presented component unit.

B. Direct Revenues

Direct revenues include tenant fees and service charges that can be identified and charged to a specific site.

1. PHA Managed AMPs

PHA currently records all direct revenues to the proper PHA Managed AMP. PHA currently records all tenant charges and any direct revenue to the proper PHA Managed AMP. PHA's account structure includes the program code (AMP number) and the appropriate department code, which enables PHA to charge the revenues to the proper PHA Managed AMPs.

PHA's systems and procedures related to direct revenues currently in application are in compliance with asset based accounting. PHA's systems and procedures will require no transition period or transition procedures to comply with asset based accounting requirements of presenting all direct revenues under the proper AMP.

2. PAPMC/AME Managed AMPs

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Direct revenues are included in the PHA Audited financial statements for each discretely presented component unit.

C. Indirect Revenues

Indirect revenues are other income items that cannot be identified or charged to a specific AMP or to the Indirect Cost Departments. Indirect revenues will be allocated between the PHA Managed AMPs based on the percentage of units available. PHA will review the treatment of these liabilities on an annual basis to confirm that its treatment is appropriate.

D. HUD Operating Subsidy

1. PAPMC / AME Manage AMPs

The Operating Subsidy paid to the PAPMC / AME Managed AMPs will continue to be based on the amount agreed to in the R&O Agreement. The Operating Subsidy amount actually paid to the PAPMC / AME Managed AMPs will be presented as an operating subsidy revenue and direct expense under the appropriate AMP.

2. PHA Managed AMPs

For PHA's project based accounting purposes, Operating Subsidy is considered an indirect revenue source. PHA's Operating Subsidy is provided in one block as if PHA were one AMP. The funding for all AMPs is calculated using the same Allowable Expense Level per PHA's MTW agreement. Since the basis of the funding calculation is the same across all AMPs, PHA considers Operating Subsidy an indirect revenue source. For all PAPMC and AME Managed AMPs, the amount of subsidy revenue allocated to these sites will be based on the R & O agreements.

PHA will distribute the remaining operating subsidy to the PHA Managed AMPs based on the actual operating needs for each of the PHA Managed AMPs. The operating subsidy transferred will be sufficient for each PHA Managed AMP to have neither an operating profit nor loss.

PHA will examine the financial needs of each of the PHA Managed AMPs using its financial statements to determine that the HUD Operating Subsidy allocated to PHA Managed AMPs is sufficient for the AMP's financial needs.

E. Operating Transfers from the MTW Block (Excess HAP) & CFP

1. PHA Managed AMPs

PHA has included in its MTW annual plan Operating Transfers from the MTW Program and the CFP Program into the Public Housing Program to offset operating expenses. PHA has determined that the appropriate treatment of Operating Transfers at the current time will be to allocate the Operating Transfers to all PHA Managed AMPs based on the number of available units. The Operating Transfers are made to assist the PHA Managed AMPs with its

operations. PHA may need to adjust the allocation of the Operating Transfers in fiscal years to assist the operating needs of one AMP over another AMP that may not need the assistance. PHA's MTW agreement with HUD permits the PHA flexibility to move funds between its Public Housing, Section 8 HCV, and CFP programs. PHA will reserve the right to adjust the allocations of the Operating Transfers to meet the financial needs of all of the PHA Managed AMPs.

2. PAPMC / AME Managed AMPs

Operating Transfers will not be allocated to the PAPMC / AME Managed AMPs.

IV. Expenses

A. Direct Expenses

1. PHA Managed AMPs

PHA currently records all direct expenses to the proper AMP. PHA's procurement and accounts payables processes include assigning the proper chart fields or account structure. PHA's account structure includes the program code (AMP number) and the appropriate department code.

For payroll, PHA directly charges all payroll costs using account labels. Account labels are used to tell PHA's accounting system where to directly charge an employee's payroll costs. PHA can setup as many account labels as needed to have payroll costs charged to the proper program, department, AMP, etc. based on PHA's requirements. PHA's accounting system gives the Authority the automated ability to charge payroll costs from the employee timesheets to the proper account. When employees complete their weekly timesheets, the employees report all hours to account labels. The timesheets allow employees to charge as many account labels as needed during the week. Employees submit their timesheets to their direct supervisor for approval. The direct supervisor verifies that the correct account labels.
PHA's systems and procedures related to direct expenses currently in application are in compliance with asset based accounting. PHA's systems and procedures will require no transition period or transition procedures to comply with asset based accounting requirements of presenting all direct revenues and expenses under the proper AMP.

2. PAPMC/AME Managed AMPs

The only PAPMC/AME Managed AMPs direct expenses that will be included in the LIPH (Fund 001) financial statements are PHA's payment of Operating Subsidies. All other direct expenses are included in the PHA Audited financial statements for each discretely presented component unit.

B. Corporate Legal

PHA has diverse legal issues due to the size of its programs. PHA will analyze legal expenses to determine the appropriate treatment of the legal expenditures. The treatments of the legal expenses are as follows:

1. Direct Legal Expenses

Legal expenses that can be identified as a direct cost to a specific AMP will be charged to that AMP.

2. Indirect Legal Expenses for the Benefit of PHA Managed AMPs

Indirect legal expenses that cannot be defined as costs for a specific AMP, but can be identified as providing benefits to the PHA Managed AMPs will be prorated across all AMPs.

3. Indirect Legal Expenses to Support MTW Objectives

Indirect legal expenses that cannot be defined as costs for a specific AMP, and cannot be identified as providing benefits to the PHA Managed AMPs will be considered legal expenses to support the MTW objectives. The legal expenses will be charged to the Indirect Cost Departments. PHA will utilize interest income and MTW transfers to offset these expenses.

C. Maintenance Expenses

1. Payroll Expenses

PHA currently directly charges all maintenance payroll costs to the direct PHA Managed AMP. PHA directly charges all payroll costs using account labels. Account labels are used to tell PHA's accounting system where to directly charge a maintenance employee's payroll costs. PHA can setup as many account labels as needed to have payroll costs charged to the proper PHA Managed AMP. PHA's accounting system gives the Authority the automated ability to charge maintenance payroll costs from the employee timesheets to the proper account. When maintenance employees complete their weekly timesheets, the employees report all hours to account labels. The timesheets allow maintenance employees to charge as many account labels as needed during the week. Maintenance employees submit their timesheets to their direct supervisor for approval. The direct supervisor verifies that the correct account labels.

2. Materials and Contract Costs

PHA currently records all maintenance materials and contract costs directly to the proper PHA Managed AMP. PHA's procurement and accounts payables processes

include assigning the proper chart fields or account structure. PHA's account structure includes the program code (AMP number) and the appropriate department code.

PHA's systems and procedures related to maintenance materials and contract costs currently in application are in compliance with asset based accounting. PHA's systems and procedures will require no transition period or transition procedures to comply with asset based accounting requirements of presenting all direct revenues and expenses under the proper AMP.

D. Indirect Expenses

1. PHA Managed AMPs

PHA will be using an allocation to charge overhead from the Indirect Cost Departments to the AMPs. The Indirect Cost Departments expenditures will be allocated to all PHA Managed AMPs. (APPENDIX 3) The overhead allocation account will always have a credit balance under the Indirect Cost Departments to offset the expenses allocated to the AMPs. PHA will have the ability to print reports that present the total revenues and operating expenses of the Indirect Cost Departments and show the overhead allocation amount as a contra to the operating expenses.

PHA will review each cost department, Indirect Cost and Frontline, to determine the appropriate allocation for each department. PHA will review all of its allocations on an annual basis to determine if each of the PHA Managed AMPs is charged the proper amount of expenses. The review of the allocations will examine the financial effects of the allocations to each of the AMPs. PHA will reserve the right to adjust allocations as needed to assist the financial solvency of all of the PHA Managed AMPs.

At the end of each fiscal year, PHA has calculated the total expenses of the Indirect Cost Departments, and then prepared an allocation of those expenses across all of the PHA Managed AMPs which has been presented as allocated overhead.

2. PAPMC / AME Managed AMPs

The Indirect Cost Departments expenditures will not be normally allocated to PAPMC / AME Managed AMPs. If expenditures are determined to benefit the PAPMC / AME Managed AMPs, those expenditures will be directly charged to the appropriate PAPMC / AME Managed AMPs.

E. Frontline Expenses

1. PHA Managed AMPs

PHA has certain frontline expenses that will be provided centrally since this is the most cost-effective way to provide these services. These services are provided to PHA Managed AMPs only. The prorating of expenses to the AMPs will be determined on a department-by-department basis, so that the AMPs receiving services from the department are charged an appropriate percentage of the department expenses (APPENDIX 2). Frontline expenses will be charged to the appropriate expense accounts for the AMPs.

PHA will review all of its allocations on an annual basis to determine if each of the PHA Managed AMPs is charged the proper amount of expenses. The review of the allocations will examine the financial effects of the allocations to each of the AMPs. PHA will reserve the right to adjust allocations as needed to assist the financial solvency of all of the PHA Managed AMPs.

2. PAPMC / AME Managed AMPs

The Indirect Cost Departments expenditures will not be normally allocated to PAPMC / AME Managed AMPs. If expenditures are determined to benefit the PAPMC / AME Managed AMPs, those expenditures will be directly charged to the appropriate PAPMC / AME Managed AMPs.

V. Capital Fund Program

PHA will apply all expenditures under the Capital Fund program to three areas, PHA Managed AMPs, PAPMC / AME Managed AMPs, and Capital Projects. Under PHA's MTW agreement, PHA is permitted flexibility with the expenditures of Capital Funds. Some of the expenditures that PHA will not be able to apply all expenditures made under the Capital Fund Program to a specific PHA Managed AMP or PAPMC / AME Managed AMP. PHA will create a separate category to charge these expenditures, Capital Projects.

Although PHA is an MTW agency and is not required to, PHA reports and tracks all CFP expenditures based on the CFP Budget Line Items. PHA has determined this method to be accurate and efficient method to track CFP expenditures.

A. 1406 Expenditures

1406 expenditures will be prorated across all PHA Managed AMPs. PHA has included in its annual plan Operating Transfers from the CFP Program into the Public Housing Program to offset operating expenses. PHA has determined that the appropriate treatment of Operating Transfers at the current time will be to allocate the Operating Transfers to all PHA Managed AMPs based on the number of available units. PHA will establish an account number for the CFP Operating Transfers. The Operating Transfers are made to assist the PHA Managed AMPs with its operations. PHA may need to adjust the allocation of the Operating Transfers in fiscal years to

assist the operating needs of one AMP over another AMP that may not need the assistance. PHA will reserve the right to adjust the allocations of the Operating Transfers to meet the financial needs of all of the PHA Managed AMPs. PHA will not present expenditures for the CFP under the Capital Projects cost department for BLI 1406.

B. 1408 / 1410 / 1430 Expenditures

PHA utilizes CFP Grant Funds in many different ways to support PHA's MTW objectives. PHA will analyze grant expenditures in these three Budget Line Items (BLIs) to determine the appropriate treatment of the expenditures. The three treatments are as follows:

1. Direct Expenditures

Expenditures that can be identified as a direct cost to a specific AMP will be charged to that AMP.

2. Indirect Expenditures for the Benefit of PHA Managed AMPs

Indirect costs that cannot be defined as expenditures for a specific AMP, but can be identified as providing benefits to the PHA Managed AMPs will be prorated across all AMPs. This would include expenditures in the 1410 BLI. PHA utilizes 10% of each year's annual award to charge an allocated percentage of administrative salaries and benefits per PHA's OMB circular A-133 compliant Indirect Cost Allocation Plan. PHA will continue to allocate administrative salaries and benefits to this BLI; however, at this time the expenditures will be prorated across all the PHA Managed AMPs. PHA will review these expenditures on an annual basis to determine if any adjustments to the allocation are required.

3. Indirect Expenditures to Support Capital Projects

Indirect costs that cannot be defined as expenditures for a specific AMP, and cannot be identified as providing benefits to the PHA Managed AMPs will be considered expenditures to support the Capital Projects. Some CFP expenditures that are included in this area would include Staff Training, Software Improvements and Database Management, and Pre-apprenticeship Job Training Programs.

C. 1501 Expenditures

1501 expenditures are related to the repayment and interest on Construction Bonds that were approved by HUD in prior fiscal years. PHA received 4 series of bonds. HUD repays the bonds and interest on different schedules for each of bonds on a semi-annual basis. PHA utilized the proceeds of the Construction

Bonds for the benefit of several different PHA Managed AMPs, for Homeownership units that have been sold, and for PAPMC / AME Managed AMPs. PHA also utilized the interest earned on the proceeds for the benefit of construction projects. PHA will not be able to identify which specific PHA Managed AMP or PAPMC / AME Managed AMPs to charge the annual payments of principle and interest. PHA plans to charge the expenditures to the Capital Projects category.

D. All Other CFP BLIs

PHA currently charges most of the grant expenditures under BLIs 1440 to 1499 to a specific PHA Managed AMP or PAPMC / AME Managed AMP. As with the other Capital Fund Program BLIs, there will be some expenditures made that PHA will not be able to charge to a specific PHA Managed AMP or PAPMC / AME Managed AMP. In these few cases, PHA will charge the expenditures to the Capital Projects category.

E. Project Based Budgeting

PHA currently prepares project based operating budgets and operating budgets for all of the departments. PHA adds all of the budgets to the Automated Accounting System. The operating budgets are currently used in the procurement and accounts payable process. The operating budgets are consolidated for the purposes of preparing PHA's monthly financial statements. PHA needs to add to the operating budgets for each of the projects and departments budget amounts for the Indirect Cost and Frontline Expense Departments allocation account. PHA's operating budget process is currently in compliance with the HUD Project Based Budgeting requirements.

When PHA has prepared its Capital Fund Program Budgets, PHA determines specific capital work items that need to be completed at all or some of PHA sites. PHA does not establish a Capital Budget by site, but by work item. Then once PHA determines which sites PHA will perform the work item, PHA reclassifies the budget amount from a PHA Wide work item to the specific site. PHA will continue this process; however, the budget will be established at the Capital Projects category rather than PHA Wide.

VI. FDS Reporting - Financial Data Schedule ("FDS")

PHA will submit its FYE 2012 FDS in compliance with the HUD "Special Instructions for Preparing Financial Data Schedules for Moving To Work Agencies" published March 9, 2010.

APPENDIX A LOCAL ASSET MANAGEMENT PLAN

APPENDIX1

PHA MANAGED SITES PAPMC / AME MANAGED SITES

PROJECT			PROJECT		
PA2·003	Richard Allen	150	PA2-126	801amonds	152
PA2·010	Raymond	552	PA2-127	Spring	86
PA2-013	Wilson Park	727	PA2·128	Martin	49
PA2·014	Norris	145	PA2-129	Cambridge	40
PA2·015	Harrison	299	PA2-130	Falls Ridge	135
PA2·018	Arch Homes	73	PA2-131	St. Anthony 's	38
PA2-020	Spring	203	PA2 132	Suffolk	137
PA2·024	Queen lane	19	PA2-133	Richard Allen	178
PA2-029	Hill Creek	331	PA2-136	Mart n	45
PA2 030	Abbottsford	235	PA2 137	Cambridge	44
PA2-031	Bartram	499	PA2·138	Mount Olivet	161
PA2-032	Oxford	199	PA2-139	Greater	245
PA2-034	Whitehall Apartments	248	PA2-143	Greater Grays Ferry Estates II	184
PA2-035	Haddlngton	147	PA2-145	Lucien E.	80
PA2-039	West Park	323	PA2-146	Angela Court	67
PA2-042	Champlost	102	PA2-147	Cambridge	40
PA2·046	Haverford	24	PA2-148	Neumann	67
PA2·049	Morton	248	PA2-149	Martin	42
PA2-0SO	Blumberg	498	PA2·150	Lucien E.	80
PA2-0S4	Parkview	20	PA2-152	Germantown	133
PA2-0S5	Falrhlll	264	PA2-153	Lucien E.	so
PA2-062	Pt. Breeze	71	PA2-156	Marshal	80
PA2-063	Katie 8	56	PA2-157	Ludlow Phase	75
PA2-065	College View	54	PA2-158	Nellie	64
PA2-066	Holmecrest	84	PA2-159	Angela	54
PA2-076	Emlen. Arms	155	PA2-160	Warnock I	50
PAl-077	Bentley Hall	96	PA2-161	Warnock II	45
PA2-079	Plymouth	53	PA2-162	Spring	32
PA2-093	Westpark	65	PA2-163	Mantua I	50
PA2-100	Cecil B	29	PA2-164	Mantua II	51
PA2-104	Arlene	32	PA2-173	Paschall	49
PA2-114	Gladys B	80	PA2-174	Paschall	50
PA2-901	Haddlngton	430	PA2-175	Norris, LP	51
PA2-902	Mantua	383			
PA2-903	Kingsesslng	518			
PA2-904	Germantown	362			
PA2·905	Falrhlll	451			
PA2-906	Francisville	417			
PA2-907	Ludlow	427			
PA2-908	Susquehanna	411			
PA2·909	Strawberry	429			
PA2 910	Oxford	341			
Total		**10,780**	**TOTAL**		**3,174**

Unit counts are those Included in subsidy calculation for calendar year ending 12/31/14

APP£NDIX2

Department ID	Department Description	FRONTLINE DEPARTMENTS AND PRORATION METHODS Proration Method
404404	Special Operations	Unit Percentage of PHA Managed
405405	Environmental Services	Unit Percentage of PHA Managed
406406	Inspections	Unit Percentage of PHA Managed
407407	Safety Office	Unit Percentage of PHA Managed
427427	Family Self Sufficiency	Unit Percentage of PHA Managed
441441	Public Housing Admissions	Unit Percentage of PHA Managed
442442	Public Housing Leasing	Unit Percentage of PHA Managed
455455	Conventional Sites Specialty Crews	Unit Percentage of PHA Managed
456456	Combustion	Unit Percentage of PHA Managed
462462	Force Account Programs	Unit Percentage of PHA Managed
463463	Work Order Center	Unit Percentage of PHA Managed
464464	Vector Control	Unit Percentage of PHA Managed
467467	Provisional Roofing	Unit Percentage of PHA Managed
468468	Roofing Inspections	Unit Percentage of PHA Managed
470470	Primary Electric	Unit Percentage of PHA Managed
471471	Elevators	Unit Percentage of PHA Managed
472472	Lock Shop	Unit Percentage of PHA Managed
473473	Specialty Plumbing	Unit Percentage of PHA Managed
494494	Fleet Management	Unit Percentage of PHA Managed
496496	Risk Management Insurance	Unit Percentage of PHA Managed
512512	Lease Enforcement/Compliance	Unit Percentage of PHA Managed
601601	Call Center	Unit Percentage of PHA Managed
651651	Customer Support Services	Unit Percentage of PHA Managed
602602	Events	Unit Percentage of PHA Managed
709712	End User Support Services	Unit Percentage of PHA Managed
440440	Office, General Manager, Scattered	Unit Percentage of Scattered Sites
450450	Office, General Manager, Conv.	Unit Percentage of Conventional
460460	Office, GM, Scattered Sites Malnt.	Unit Percentage of Scattered Sites
431431/451451	North Area Management	Unit Percentage of North Region
432432/452452	Northeast Area Management	Unit Percentage of Northeast
433433/453453	South Area Management	Unit Percentage of South Region
434434/454454	West Area Management	Unit Percentage of West Region
438438/458458	North Central Area Management	Unit Percentage of North Central
431431/451451	North Area Vacancy Crew	Unit Percentage of North Region
432432/452452	Northeast Area Vacancy Crew	Unit Percentage of Northeast
433433/453453	South Area Vacancy crew	Unit Percentage of South Region
434434/454454	West Area Vacancy Crew	Unit Percentage of West Region
438438/458458	North Central Area Vacancy Crew	Unit Percentage of North Central
490490-493493	PHA Police	Unit Percentage of PHA Managed AMPs Only

APPENDIX 2 (CONTINUED)
PHA FRONTLINE PRORATION RATE CALCULATIONS PROJECT

NUMBER	PROJECT NAME	UNITS	PERCENTAGE
PA2-001	Johnson Homes	530	4.9165%
PA2-003	Richard Allen	150	1.3915%
PA2-010	Raymond Rosen	552	5.1206%
PA2-013	Wilson Park	727	6.7440%
PA2-014	Norris Apartments	145	1.3451%
PA2-015	Harrison Plaza	299	2.7737%
PA2-018	Arch Homes	73	0.6772%
PA2-020	Spring Garden Apartments	203	1.8831%
PA2-024	Queen Lane Apartments	19	0.1763%
PA2-029	Hill Creek	331	3.0705%
PA2-030	Abbottsford Homes	235	2.1800%
PA2-031	Bartram Village	499	4.6289%
PA2-032	Oxford Village	199	1.8460%
PA2-034	Whitehall Apartments	248	2.3006%
PA2-035	Haddington Homes	147	1.3636%
PA2-039	West Park Apartments	323	2.9963%
PA2-042	Champlost Homes	102	0.9462%
PA2-046	Haverford Homes	24	0.2226%
PA2-049	Morton Homes	248	2.3006%
PA2-050	Blumberg Apts	498	4.6197%
PA2-054	Parkview Apartments	20	0.1855%
PA2-055	Fairhill Apartments	264	2.4490%
PA2-062	Pt. Breeze	71	0.6586%
PA2-063	Katie B Jackson	56	0.5195%
PA2-065	College View	54	0.5009%
PA2-066	Holmecrest Homes	84	0.7792%
PA2-076	Emlen Arms	155	1.4378%
PA2-077	Bentley Hall	96	0.8905%
PA2-079	Plymouth Hall	53	0.4917%
PA2-093	Westpark Plaza	65	0.6030%
PA2-100	Cecil B Moore	29	0.2690%
PA2-104	Arlene Homes	32	0.2968%
PA2-114	Gladys B Jacobs	80	0,7421%
PA2-901	Haddington	430	3.9889%
PA2-902	Mantua	383	3.5529%
PA2-903	Kingsesslng	518	4.8052%
PA2-904	Germantown/Hunting Park	362	3.3581%
PA2-905	Fairhill Square	451	4.1837%
PA2-906	Francisville	417	3.8683%
PA2-907	Ludlow	427	3.9610%
PA2-908	Susquehanna	411	3.8126%
PA2-909	Strawberry Mansion	429	3.9796%
PA2-910	Oxford Jefferson	341	3.1633%
PHA Managed AMPs Only Total		10,780	100.00%

Unit counts are those included in subsidy calculation for calendar year ending 12/31/14

APPENDIX 2 (CONTINUED)

PHA FRONTUNE PRORATION RATE CALCULATIONS

PROJECT NUMBER	PROJECT NAME	UNITS	PERCENTAGE
Germantown Region			
PA2-024	Queen lane Apartments	19	2.503%
PA2-030	Abbottsford Homes	235	30.962%
PA2-042	Champlost Homes	102	13.439%
PA2-049	Morton Homes	248	32.675%
PA2-076	Emlen Arms	155	20.422%
Germantown Region Total		**759**	**100.000%**
North Central Region			
PA2-001	Johnson Homes	530	31.623%
PA2-010	Raymond Rosen	552	32.936%
PA2-050	Blumberg Apts	498	29.714%
PA2-077	Bentley Hall	96	5.728%
North Central Region Total		1676	100.000%
North Region			
PA2-003	Richard Allen	150	13.146%
PA2-014	Norris Apartment s	145	12.708%
PA2-015	Harrison Plaza	299	26.205%
PA2-020	Spring Garden Apartment	203	17.791%
PA2-055	Fairhlll Apartments	264	23.138%
PA2-114	Gladys B Jacobs	80	7.011%
North Region Total		**1141**	**100.000%**
Northeast Region			
PA2-029	Hill Creek	331	36.175%
PA2-032	Oxford Village	199	21.749%
PA2-034	Whitehall Apartment s	248	27.104%
PA2-066	Holmecrest Homes	84	9.180%
PA2-079	Plymouth Hall	53	5.792%
Northeas Region Total		**915**	**100.000%**

APPENDIX 2 (CONTINUED)

Scattered Sites Region

PA2-054	Parkview Apartments	20	0.465%
PA2-065	College View	54	1.255%
PA2-100	Cecil B Moore	29	0.674%
PA2-104	Arlene Homes	32	0.743%
PA2-901	Haddington	430	9.991%
PA2-902	Mantua	383	8.899%
PA2-903	Kingsessing	518	12.035%
PA2-904	Germantown/Hunting Park	362	8.411%
PA2-905	Fairhill Square	451	10.479%
PA2-906	Francisville	417	9.689%
PA2-907	Ludlow	427	9.921%
PA2-908	Susquehanna	411	9.549%
PA2-909	Strawberry Mansion	429	9.967%
PA2-910	Oxford Jefferson	341	7.923%
Scattered Sites Region Total		**4304**	**100.000%**

South Region

PA2-013	Wilson Park	727	51.269%
PA2-031	Bartram Village	499	35.190%
PA2-062	Pt. Breeze	71	5.007%
PA2·063	Katie B Jackson	56	3.949%
PA2 093	Westpark Plaza	65	4.584%
South	**Region Total**	**1418**	**100.000%**

West Region

PA2-018	Arch Homes	73	12.875%
PA2·035	Haddington Homes	147	25.926%
PA2-039	West Park Apartments	323	56.966%
PA2-046	Haverford Homes	24	4.233%
West Region Total		**567**	**100.000%**

Unit counts are those Included in subsidy calculation for calendar year ending 12/31/14

APPENDIX 2 (CONTINUED)

PHA FRONTUNE PRORATION RATE CALCULATIONS

PROJECT NUMBER	PROJECT NAME	UNITS	PERCENTAGE
Conventional Sites			
PA2-001	Johnson Homes	530	8.1841%
PA2-003	Richard Allen	150	2.3162%
PA2-010	Raymond Rosen	552	8.5238%
PA2-013	Wilson Park	727	11.2261%
PA2-014	Norris Apartments	145	2.2390%
PA2-015	Harrison Plaza	299	4.6170%
PA2-018	Arch Homes	73	1.1272%
PA2-020	Spring Garden	203	3.1347%
PA2-024	Queen Lane Apartments	19	0.2934%
PA2-029	Hill Creek	331	5.1112%
PA2-030	Abbottsford Homes	235	3.6288%
PA2-031	Bartram Village	499	7.7054%
PA2-032	Oxford Village	199	3.0729%
PA2-034	Whitehall Apartments	248	3.8295%
PA2-035	Haddington Homes	147	2.2699%
PA2-039	West Park Apartments	323	4.9876%
PA2-042	Champlost Homes	102	1.5750%
PA2-046	Haverford Homes	24	0.3706%
PA2-049	Morton Homes	248	3.8295%
PA2-050	Blumberg Apts	498	7.6899%
PA2-055	Fairhill Apartments	264	4.0766%
PA2-062	Pt. Breeze	71	1.0964%
PA2-063	Katie B Jackson	56	0.8647%
PA2-066	Holmecrest Homes	84	1.2971%
PA2-076	Emlen Arms	155	2.3935%
PA2-077	Bentley Hall	96	1.4824%
PA2-079	Plymouth Hall	53	0.8184%
PA2-093	Westpark Plaza	65	1.0037%
PA2-114	Gladys B Jacobs	80	1.2353%
Conventional Sites Total		**6476**	**100.00%**

Unit counts are those Included In subsidy calculation for calendar year ending 12/31/14

APPENDIX 3
INDIRECT COST DEPARTMENTS OVERHEAD ALLOCATION RATES PROJECT

NUMBER	PROJECT NAME	UNITS	%
PA2-001	Johnson Homes	530	4.9165%
EEPA2-003	Richard Allen	150	1.3915%
PA2-010	Raymond Rosen	552	5.1206%
PA2-013	Wilson Park	727	6.7440%
PA2·014	Norris Apartments	145	1.3451%
PA2-015	Harrison Plaza	299	2.7737%
PA2-018	Arch Homes	73	0.6772%
PA2-020	Spring Garden Apartments	203	1.8831%
PA2·024	Queen Lane Apartments	19	0.1763%
PA2·029	Hill Creek	331	3.0705%
PA2·030	Abbottsford Homes	235	2.1800%
PA2-031	Bartram Village	499	4.6289%
PA2-032	Oxford Village	199	1.8460%
PA2-034	Whitehall Apartments	248	2.3006%
PA2-035	Haddington Homes	147	1.3636%
PA2-039	West Park Apartments	323	2.9963%
PA2-042	Champlost Homes	102	0.9462%
PA2·046	Haverford Homes	24	0.2226%
PA2·049	Morton Homes	248	2.3006%
PA2·050	Blumberg Apts	498	4.6197%
PA2·054	Parkview Apartments	20	0.1855%
PA2-055	Fairhill Apartments	264	2.4490%
PA2-062	Pt. Breeze	71	0.6586%
PA2-063	Katie B Jackson	56	0.5195%
PA2-065	College View	54	0.5009%
PA2-066	Holmecrest Homes	84	0.7792%
PA2-076	Emlen Arms	155	1.4378%
PA2-077	Bentley Hall	96	0.8905%
PA2-079	Plymouth Hall	53	0.4917%
PA2-093	Westpark Plaza	65	0.6030%
PA2-100	Cecil B Moore	29	0.2690%
PA2-104	Arlene Homes	32	0.2968%
PA2-114	Gladys B Jacobs	80	0.7421%
PA2-901	Haddington	430	3.9889%
PA2-902	Mantua	383	3.5529%
PA2-903	Klngsessing	518	4.8052%
PA2-904	Germantown/Hunting Park	362	3.3581%
PA2-905	Fairhlll Square	451	4.1837%
PA2-906	Francisville	417	3.8683%
PA2-907	Ludlow	427	3.9610%
PA2-908	Susquehanna	411	3.8126%
PAl-909	Strawberry Mansion	429	3.9796%
PA2-910	Oxford Jefferson	341	3.1633%
	PHA Managed AMPs Only Total	10,780	100.00%

APPENDIX 2 (CONTINUED)

Unit counts are those included in subsidy calculation for calendar year ending 12/31/14

APPENDIX B – BOARD RESOLUTION AND MTW CERTIFICATION

RESOLUTION NO. 11752

RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY TO SUBMIT ITS MOVING TO WORK ("MTW") ANNUAL PLAN ("PLAN") FOR FISCAL YEAR SIXTEEN TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT ("HUD") AND TO TAKE ALL ACTIONS TO OBTAIN HUD APPROVAL AND IMPLEMENT THE PLAN

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") administers a Moving to Work ("MTW") Demonstration Program that is designed to provide the opportunity for selected Housing Authorities to explore and demonstrate more efficient ways to provide and administer low-income housing; and

WHEREAS, pursuant to Philadelphia Housing Authority ("PHA") Board of Commissioners Resolution No. 10618, dated December 21, 2000, PHA submitted to HUD an MTW Application Plan and Agreement; and

WHEREAS, since 2001, when HUD accepted PHA's application for participation in the MTW Demonstration Program and HUD and PHA executed a MTW Demonstration Agreement ("MTW Agreement"), PHA has continuously participated in the MTW Demonstration Program; and

WHEREAS, as a participant in the MTW Demonstration Program, PHA is required to develop an MTW Annual Plan for each fiscal year during the term of the MTW Agreement, which outlines the PHA budget and MTW activities, and to submit the Annual Plan for approval by its Board at least seventy-five (75) days prior to the beginning of each fiscal year; and

WHEREAS, PHA has developed the MTW Annual Plan for Fiscal Year Sixteen ("Plan"), beginning on April 1, 2015, a summary of which is attached hereto as Attachment "A;" and which has been distributed to the Board;

WHEREAS, PHA has fulfilled the HUD requirement of providing opportunities for resident and public participation and comment on the Annual Plan, including scheduling at least one (1) public hearing and taking into consideration any comments received, by: 1) holding an introductory meeting with resident leadership and interested PHA residents on November 25, 2014; 2) holding a public hearing on December 1, 2014; 3) posting the draft plan on PHA's website; 4) making copies of the draft plan available at PHA site offices; and 5) accepting and considering public comments over a period lasting from November 17, 2014 to December 17, 2014; and

WHEREAS, PHA is a block grant agency and the MTW Annual Plan includes a consolidated budget in accordance with the MTW Agreement;

BE IT RESOLVED, that the Board of Commissioners does hereby approve the MTW Annual Plan for Fiscal Year Sixteen, in substantially the form distributed to the Board, and authorize PHA's Chair and/or its President & CEO or their authorized designee(s) to: 1) submit to HUD the PHA MTW Annual Plan for Fiscal Year Sixteen; 2) take all steps necessary to finalize and secure HUD approval and implement initiatives as described in the Plan, subject to receipt of adequate funding from HUD; 3) certify that the Public Hearing requirement has been met; and 4) execute the HUD Certifications of Compliance with MTW Plan Requirements and Related Regulations, in substantially the form attached hereto as Attachment "B"

I hereby certify that this was
APPROVED BY THE BOARD ON 12/8/14
Barbara Chen, General Counsel
ATTORNEY FOR PHA

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

Certifications of Compliance

Annual Moving to Work Plan
Certifications of Compliance

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan*

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning April 1, 2015, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Philadelphia Housing Authority	PA002
PHA Name	PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Lynette Brown-Sow	Chair of the Board of Commissioners
Name of Authorized Official	Title
Signature	1/12/15
	Date

*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Philadelphia Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Annual Plan FY 2016

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. Sites for Work Performance. The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

12 South 23rd Street, Philadelphia PA 19103 and all PHA sites

Check here ☐ if there are workplaces on file that are not identified on the attached sheets.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
Kelvin A. Jeremiah	President & CEO
Signature X	Date 1/5/15

form **HUD-50070** (3/98)
ref. Handbooks 7417.1, 7475.13, 7485.1 & .3

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action:
[a] a. contract
b. grant
c. cooperative agreement
d. loan
e. loan guarantee
f. loan insurance

2. Status of Federal Action:
[a] a. bid/offer/application
b. initial award
c. post-award

3. Report Type:
[a] a. initial filing
b. material change
For Material Change Only:
year _____ quarter _____
date of last report _____

4. Name and Address of Reporting Entity:
[x] **Prime** [ ] **Subawardee**
Tier _____, *if known*:

Congressional District, *if known*: 4c 2nd

5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:

Congressional District, *if known*:

6. Federal Department/Agency:
U.S. Department of Housing and Urban Development

7. Federal Program Name/Description:
Moving to Work Annual Plan FY 2016
CFDA Number, *if applicable*: 14.870

8. Federal Action Number, *if known*:

9. Award Amount, *if known*:
$

10. a. Name and Address of Lobbying Registrant
(*if individual, last name, first name, MI*):
Not applicable

b. Individuals Performing Services (*including address if different from No. 10a*)
(*last name, first name, MI*):

11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Signature: [signature]
Print Name: Kelvin A. Jeremiah
Title: President & CEO
Telephone No.: 215-684-4174 Date: 1/5/15

Federal Use Only:

Authorized for Local Reproduction
Standard Form LLL (Rev. 7-97)

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.

2. Identify the status of the covered Federal action.

3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.

4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.

5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.

6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.

7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.

8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."

9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.

10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.

    (b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).

11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Certification of Payments to Influence Federal Transactions

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Applicant Name

Philadelphia Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Annual Plan FY 2016

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
Kelvin A. Jeremiah	President & CEO
Signature	Date (mm/dd/yyyy)
	1/5/16

Previous edition is obsolete **form HUD 50071** (01/14)

ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

ADDENDA
TO
CERTIFICATION OF PAYMENTS TO INFLUENCE FEDERAL TRANSACTIONS

This certification does not extend to actions taken prior to my appointment as President & CEO of the Philadelphia Housing Authority.

Name of Authorized Official: **Kelvin A. Jeremiah, President & CEO**

Signature:_____

Date: 1/5/15

Certification of Consistency with the Consolidated Plan

U.S. Department of Housing and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan. (Type or clearly print the following information:)

Applicant Name: Philadelphia Housing Authority

Project Name: PHA - Moving to Work Annual Plan FY 2016

Location of the Project: The development and implementation of affordable housing and economic development initiatives in Phila., in accord with the City's ConPlan and AI. (2015 Consolidated Plan, adopted June, 2014)

Name of the Federal Program to which the applicant is applying: HUD - Moving to Work Demonstration

Name of Certifying Jurisdiction: City of Philadelphia, Office of Housing & Community Development

Certifying Official of the Jurisdiction Name: Deborah McColloch

Title: Director

Signature: Deborah McColloch

Date: 12/10/2014

APPENDIX C – ASSET MANAGEMENT TABLE

Appendix C : Public Housing Long term Asset Management Table

Name, Number and Location	Number and Type of Units	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Abbottsford Homes PA002030	Phases I & II; 688 Family Units	Possible site for additional redevelopment including commercial space, through mixed financing.	Possible disposition of a portion of the site in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Arch Homes PA002018	77 Family	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with RAD/CNI and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Bartram Village PA002031	492 Family Units	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Bentley Hall PA002077	100 Elderly Units			99 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	

Blumberg Apartments PA002050	499 Units: High/Low Rise: Family & Elderly	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.	94 units designated.	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Cambridge Plaza Phase I PA-002137	44 LIHTC Rental Units					
Cambridge Plaza Phase II PA-002129	40 LIHTC Rental Units					
Cambridge Plaza Phase III Phase I PA002147	40 LIHTC Rental Units					
Cassie Holly (Point Breeze Court) PA002062	71 Elderly Units	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.		71 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Champlost Homes PA002042	102 Family				Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
City-Wide	To be determined	Provision of ACC subsidy, capital funds or HCV.	Dispo/Demo application to be submitted to HUD.			

Collegeview Homes PA002065	54 Elderly	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.		54 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Courtyard Apartments at Riverview PA002053 New PA#: PA002121	470 LIHTC Rental Units	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.				
Deleted - Brewerytown	45	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Deleted - Brown Street Village PA002096	Originally 87 Units; total development slated for homeownership.	Homeownership development. All units sold.				Turnkey III Released for Occupancy in 1980-1982. Homeowner's Association formed. Homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.

Deleted - Eastern Germantown Infill	45	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Deleted - Empowerment Zone 2100 Block of American	45		Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Deleted - Kensington North	TBD.	Acquisition, new development for 80 units and rehabilitation of scattered site housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Deleted - Ludlow HOPE 6 Area Scattered Sites PA #s: PA002154	Phases I, II, III, IV & V; 75 LIHTC and 103 Homeownership units	Development completed				

Eastern North Philadelphia	45	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Eight Diamonds PA00126 PA00141 (Formerly known as Raymond Rosen Off-Site PA002126)	Phases A & B; 152 Family					
Emlen Arms PA002076	156 Elderly High Rise			156 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Fairhill Apartments PA002055	264 Family					
Falls Ridge PA002130	135 LIHTC Rental Units;	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.				

Francisville	45	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Germantown House PA002152	133 Units			133 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Gladys B. Jacobs PA002114	80 Elderly	Possible renovation for delivery of enhanced senior support services.		80 Elderly Units		
Greater Grays Ferry Estates (Formerly known as Tasker Homes) New AMP#s: PA002139 PA002143	429 LIHTC rental units; 125 replacement home ownership units.	Possible mixed-finance development and commercial development including community building on PHA vacant lots and public parcels .	Possible disposition in connection with non-dwelling commercial development including community building.			
Haddington Homes PA002035	150 Family	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.

Harrison Plaza PA002015	300 Family High and Low Rise	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with RAD/CNI and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Haverford Homes PA002046	24 Family	Possible candidate for modernization, rehabilitation, with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Herbert Arlene Homes PA002104	32 Family	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.	Possible Elderly Designation	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Hill Creek Apts I & II PA002029	334 Family	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	

Holmecrest Apartments PA002066	84 Elderly	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.		84 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Inglis House	TBD	May provide capital funds, ACC subsidy and/or Section 8 vouchers for this project.				
James Weldon Johnson House PA002001	535 Family	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.		Possible Elderly Designation	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Katie B. Jackson PA002063	59 Elderly 9 Family	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.		59 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Liddonfield Homes I PA002023	412 Family Low Rise	Possible candidate for revitalization/development by third party developer.	Demolition completed.			Possible homeownership component in connection with potential modernization and revitalization.
Lucien E. Blackwell Homes Phase I PA002145	80 LIHTC Rental Units					

Lucien E. Blackwell Homes Phase II PA002150	80 LIHTC Rental Units					
Lucien E. Blackwell Homes Phase III PA002153	50 LIHTC Rental Units					
Lucien E. Blackwell Homes Phase IV (Marshall Shepard Village) PA002156	80 LIHTC Rental Units					
Mantua Hall PA002045	152 Family High-Rise Units	All units completed.				
Martin Luther King Plaza PA002036 New PA#s: PA002128 PA002136 PA002149	Phases I, II, III, IV, V & VI; 136 LIHTC Rental Units and 109 Replacement Homeownership Units.	All Phases completed. New construction of 19 market rate homeownership units on a portion of the site.	Possible disposition in connection with mixed-finance development and/or other sale transactions to City and private developers.			109 Homeownership Units. HOPE VI HO Middle income Program essential elements of Nehemiah, USHA of 1937.
Mill Creek Extension East	100 Rental Units	Possible scattered sites acquisition. Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization.			Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Mill Creek Extension West	100 Rental Units	Possible scattered sites acquisition. Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization.			Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.

Morton Homes PA002049	65 Units	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.	47 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Mt. Olivet PA002138	161 LIHTC Rental Units	Possible major exterior envelope and air conditioner heating system to be improved.		161 Elderly Units		
Multi-Family Units for Replacement Housing Units	368 Family Units	Site-Based Waiting List. Using capital funds to acquire and develop these replacement housing units. Provide ACC subsidy.	Disposition and acquisition application may be required.	Possible Elderly Only designation.		
Nellie Reynolds Garden PA002158	64 Elderly housing units.	Development completed		64 Elderly housing designation.		
Neumann North PA002148	67 LIHTC Rental Units			67 Elderly Units Designated		
Norris I Apartments PA002014	147 Family Low-Rise.	Undergoing modernization, rehabilitation, revitalization, with capital funds, bond proceeds, MTW, program incomes, private funds. PHA awarded RAD/CNI, Choice Neighborhood funding and will seek LIHTC funds when available.	Planned demolition in connection with the revitalization activities, and planned disposition in connection with mixed-finance development.			30 homeownership component in connection with CNI modernization and revitalization.

Oak Lane	100 Rental Units	Possible scattered sites acquisition. Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only designation.	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Oxford Village PA002032	200 Family Units	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Parkview Apartments PA002054	20 Elderly Low Rises					
Paschall Homes PA002061	223 Family	Completed revitalization, which included demolition with capital funds, bond proceeds, MTW, Stimulus, program incomes, private funds and LIHTC equity to develop 100 new units.	Completed demolition in connection with the modernization and revitalization, and possible acquisition/disposition in connection with mixed-finance development.			
Passyunk Homes PA002052	All units demolished.	Private entity to develop market rate housing and a new 80,000 square foot building for PHA.	Disposition of property to private developer completed.			
Philadelphia School District Portfolio	TBD	Redevelopment of vacant school sites for affordable housing and mixed income development.		May be elderly designated units.		Possible homeownership component in connection with potential modernization and revitalization.

Plymouth Hall PA002079	69 Elderly High Rise	Rehabilitation with capital funds to develop 53 ACC units		53 Elderly Units Elderly Designation to be revised	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space. Reduce unit count from 60 to 53 with new community space.	
Poplar to Oxford: Planning and Development Initiative	45	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units. PHA plan to submit the LIHTC and/or other State, City funding sources for new development.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Queen Lane I Apartments PA002024	120 Family high Rise	Undertaking revitalization, which included demolition with capital funds, bond proceeds, MTW, program incomes, private funds.	Complete demolition and disposition in connection with new development and mixed finance.			
Raymond Rosen On-Site PA002010	356 Family.					

Replacement unit Initiative		Possible acquisition of foreclosure properties, 202 properties, Private properties in combination with LIHTC and mixed finance development to develop new replacement units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	Possible Elderly Designation		Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Richard Allen Homes Phase III PA002133	178 LIHTC Rental Units					Includes 15-year tax credit and lease purchase homeownership components.
Richard Allen Homes Phase II PA002003	150 Units	Possible new development for residential and non-residential on vacant undeveloped parcels	Possible disposition in connection with the new development.			Possible homeownership component in connection with potential modernization and revitalization.
Scattered Site Disposition: City-Wide	To be determined	Disposition Plan to be developed and implemented. Disposition of properties at market rate.	Possible demolition in connection with the modernization and revitalization. Disposition application may be required.			Possible Homeownership Component: Revised 5(h)/Section 32 of USHA of 1937.

Scattered Sites PA002000906	412 Family Units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for RAD/CNI, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
Scattered Sites PA002000907	958 Family Units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for RAD/CNI, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.

Scattered Sites PA002000908	14 Family Units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for RAD/CNI, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
Scattered Sites PA002000901	1,869 Family ???	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for RAD/CNI, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937. Possible homeownership component in connection with potential modernization and revitalization.

Scattered Sites PA002000902	21 Family Units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for RAD/CNI, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
Scattered Sites PA002000903	988 Family Units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for RAD/CNI, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.

Scattered Sites PA002000904	41 Family Units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for RAD/CNI, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
Scattered Sites PA002000905	173 Family Units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for RAD/CNI, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.

Scattered Sites PA002000909	604 Family Units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for RAD/CNI, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
Scattered Sites PA002000910	514 Family Units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for RAD/CNI, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.

South Phila area planning	45	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Southwest Phila Area planning	45	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Spring Garden Apartments PA002020	203 Family	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.	Potential demolition and disposition applications may be submitted for a portion of site.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.

Spring Garden Area Unit Conversion	45	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Spring Garden Revitalization: Phase 1 PA002127	84 LIHTC Rental Units					
Spring Garden Revitalization: Phase 2 PA002162	58 LIHTC Units 32 ACC units	Mixed-finance development by third party developer.	Disposition of scattered site properties for new development			
St Anthony's Senior Residence: PA002131	38 Elderly LIHTC Units			38 Elderly Units		
St Ignatius Phase I (Angela Court II) PA002146 PA002159	Phases I; 67 Elderly Units Phase II 64?			67 and 54 Elderly Units Designated		
Suffolk Manor PA002132	137 LIHTC Rental Units	Possible major exterior envelope and air conditioner heating system to be improved.		77 Elderly Units		
Transitional Housing	500 Rental Units	New construction of transitional housing units for homeless families and individuals and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Warnock PA002160	Phase I 50; TBD	Development completed				

Warnock PA002161	Phase II Transitional housing; 45 units	Acquisition, new development for 45 housing units and rehabilitation of housing stock along with neighborhood revitalization efforts with PHA offices and Elderly Services space.		45 Elderly housing designation.		
West Park Plaza PA002093	66 Units	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
West Philadelphia North of Market Street	45	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Westpark Apartments PA002039	325 Family High-Rise Units	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with RAD/CNI and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development or to private developers.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Whitehall Apartments I PA002034	188 Family	Modernization completed 2005				

Whitman Park PA002051	Originally 120 Units, Total development slated for homeownership					Homeownership development; one unit remain to be sold
Wilson Park PA002013	741 Family, Low-rise; Elderly, High-rise	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with RAD/CNI and/or LIHTC Application.		279 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial economic development, management offices, community and supportive services offices and/or open space.	

APPENDIX D – MTW TDC/HCC*

**PHA's most recently updated MTW TDC and HCC cost limits as of 2014, along with information on the methodology used to establish these cost limits, are included in this attachment for informational purposes. Per discussion with HUD, the 2014 MTW TDC/HCC cost limits will be reviewed and approved by HUD either as a technical amendment to the FY 2016 Plan or as part of the FY 2017 Annual Plan approval process.*

YEAR	PPPI (Producer Prices Paid Index) 1.	PPRI (Producer Prices Received Index) 1.	PPPI (Producer Prices Paid Index) 1.	PPRI (Producer Prices Received Index) 1.	CCI (ENR's Construction Cost Index) 2.	CPI (Consumer Price Index) 3.	PL-566 Water Resource Discount Rate 4.	OMB 10Y A-76 Nominal Discount Rate 5.
	1977 Index	1977 Index	1990-92 Index	1990-92 Index	1913 Index			
1996	210.90	162.00	115	112	5620.00	156.90	7.625	5.600
1997	216.40	154.77	118	107	5826.00	160.50	7.375	6.100
1998	210.90	147.54	115	102	5920.00	163.00	7.125	5.900
1999	210.90	137.41	115	95	6059.00	166.60	6.875	4.900
2000	220.07	138.86	120	96	6221.00	172.20	6.625	6.100
2001	225.57	147.54	123	102	6334.00	177.07	6.375	5.400
2002	227.41	141.75	124	98	6538.00	179.88	6.125	5.100
2003	234.74	154.77	128	107	6694.64	183.96	5.875	4.200
2004	243.91	160.55	133	111	7114.89	188.90	5.625	4.600
2005	262.25	164.89	143	114	7445.98	195.30	5.375	4.600
2006	271.42	175.02	148	121	7887.62	201.60	5.125	5.000
2007	289.76	199.61	158	138	8551.32	207.34	4.875	5.000
2008	324.60	192.38	177	133	8549.06	215.303	4.875	4.600
2009	335.61	198.16	183	137	8660.08	214.537	4.625	4.200
2010	350.28	231.43	191	160	8952.40	219.179	4.375	3.900
2011	375.95	258.91	205	179	9171.73	225.672	4.125	3.000
2012	397.96	290.73	217	201	9412.25	229.601	4.000	2.800
2013	**390.62**	**260.36**	**213**	**180**	**9667.77**	**233.069**	**3.750**	**2.000**
2014							**3.500**	**2.000**
Report Dates	December, 2013	December, 2013	December, 2013	December, 2013	January, 2014	November, 2013	October, 2013	December, 2012

Data Sources:

1. Prices paid and Received by Farmers, ERS/NASS data provided through Cornell University.
http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1002
http://www.nass.usda.gov/Charts_and_Maps/graphics/data/pitw.txt
Note: The Limited Resource Farmer index is based on the October, 2004 PPPI of 125.

2. Engineering News Review, Construction Cost Index History
http://enr.construction.com/economics/default.asp
The ENR website only provides the current month CCI. History of CCI available to members.
The December (end of year) ENR CCI index is provided

3. Consumer Price Index-All Urban Consumers
http://inflationdata.com/Inflation/Consumer_Price_Index/CurrentCPI.asp
The annual average CPI is reported.

4. FY Plan Formulation Rate For Federal Water Projects, updated annually in early October
http://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/cntsc/?&cid=nrcs143_009685

5. OMB Circ. A-94 10-Year Nominal Discount Rate, Updated annually in January
http://www.whitehouse.gov/omb/circulars/a094/a094.html

2010 TOTAL DEVELOPMENT COST (TDC) and HOUSING COST CAP (HCC) LIMITS

PHA MTW HCC / TDC as of 2009 STUDY

ENR Construction Cost Index	2009	8660.08

HCC	Number of Bedrooms					
Type of Unit	0	1	2	3	4	5
Detached/Semi-Detached	$ -	$ 225,373	$ 266,207	$ 319,931	$ 374,708	$ 429,310
Row House	$ -	$ 203,374	$ 239,263	$ 287,115	$ 334,969	$ 382,821
Walk-up	$ 176,055	$ 176,055	$ 203,708	$ 269,878	$ 331,729	$ 390,368
Elevator	$ -	$ 213,541	$ 249,365	$ 331,717	$ 411,330	$ 486,550

TDC	Number of Bedrooms					
Type of Unit	0	1	2	3	4	5
Detached/Semi-Detached	$ -	$ 394,402	$ 465,863	$ 559,880	$ 655,740	$ 751,292
Row House	$ -	$ 355,904	$ 418,710	$ 502,451	$ 586,195	$ 669,937
Walk-up	$ 308,097	$ 308,097	$ 356,490	$ 472,286	$ 580,525	$ 683,144
Elevator	$ -	$ 341,665	$ 398,985	$ 530,747	$ 658,128	$ 778,480

2011 TOTAL DEVELOPMENT COST (TDC) and HOUSING COST CAP (HCC) LIMITS

ENR - Construction Cost Index	2009	8660.08
	2010	8952.40
	% Change	103.38%

HCC	Number of Bedrooms					
Type of Unit	0	1	2	3	4	5
Detached/Semi-Detached	$ -	$ 232,980	$ 275,193	$ 330,730	$ 387,356	$ 443,801
Row House	$ -	$ 210,239	$ 247,339	$ 296,807	$ 346,276	$ 395,743
Walk-up	$ 181,998	$ 181,998	$ 210,584	$ 278,988	$ 342,926	$ 403,545
Elevator	$ -	$ 220,749	$ 257,782	$ 342,914	$ 425,214	$ 502,973

TDC	Number of Bedrooms					
Type of Unit	0	1	2	3	4	5
Detached/Semi-Detached	$ -	$ 407,716	$ 481,587	$ 578,778	$ 677,873	$ 776,652
Row House	$ -	$ 367,918	$ 432,844	$ 519,411	$ 605,983	$ 692,550
Walk-up	$ 318,496	$ 318,496	$ 368,522	$ 488,228	$ 600,121	$ 706,203
Elevator	$ -	$ 386,311	$ 451,119	$ 600,100	$ 744,125	$ 880,204

2012 TOTAL DEVELOPMENT COST (TDC) and HOUSING COST CAP (HCC) LIMITS

ENR - Construction Cost Index	2010	8952.40
	2011	9171.73
	% Change	102.45%

HCC	Number of Bedrooms					
Type of Unit	0	1	2	3	4	5
Detached/Semi-Detached	$ -	$ 238,688	$ 281,935	$ 338,833	$ 396,846	$ 454,674
Row House	$ -	$ 215,390	$ 253,399	$ 304,078	$ 354,759	$ 405,439
Walk-up	$ 186,457	$ 186,457	$ 215,743	$ 285,823	$ 351,328	$ 413,432
Elevator	$ -	$ 226,157	$ 264,098	$ 351,315	$ 435,632	$ 515,296

TDC	Number of Bedrooms					
Type of Unit	0	1	2	3	4	5
Detached/Semi-Detached	$ -	$ 417,705	$ 493,386	$ 592,958	$ 694,481	$ 795,680
Row House	$ -	$ 376,932	$ 443,448	$ 532,137	$ 620,829	$ 709,518
Walk-up	$ 326,299	$ 326,299	$ 377,551	$ 500,190	$ 614,824	$ 723,505
Elevator	$ -	$ 395,775	$ 462,171	$ 614,802	$ 762,356	$ 901,768

2013 TOTAL DEVELOPMENT COST (TDC) and HOUSING COST CAP (HCC) LIMITS

ENR - Construction Cost Index	2011	9171.73
	2012	9412.25
	% Change	102.62%

HCC	Number of Bedrooms					
Type of Unit	0	1	2	3	4	5
Detached/Semi-Detached	$ -	$ 244,948	$ 289,328	$ 347,719	$ 407,253	$ 466,598
Row House	$ -	$ 221,038	$ 260,044	$ 312,052	$ 364,063	$ 416,071
Walk-up	$ 191,346	$ 191,346	$ 221,401	$ 293,318	$ 360,541	$ 424,273
Elevator	$ -	$ 232,088	$ 271,024	$ 360,528	$ 447,056	$ 528,809

TDC	Number of Bedrooms					
Type of Unit	0	1	2	3	4	5
Detached/Semi-Detached	$ -	$ 428,659	$ 506,325	$ 608,507	$ 712,693	$ 816,546
Row House	$ -	$ 386,817	$ 455,077	$ 546,092	$ 637,110	$ 728,124
Walk-up	$ 334,856	$ 334,856	$ 387,452	$ 513,307	$ 630,947	$ 742,478
Elevator	$ -	$ 406,154	$ 474,291	$ 630,924	$ 782,348	$ 925,416

2014 TOTAL DEVELOPMENT COST (TDC) and HOUSING COST CAP (HCC) LIMITS

ENR - Construction Cost Index	2012	9412.25
	2013	9667.77
	% Change	102.71%

HCC	Number of Bedrooms					
Type of Unit	0	1	2	3	4	5
Detached/Semi-Detached	$ -	$ 251,597	$ 297,183	$ 357,158	$ 418,309	$ 479,265
Row House	$ -	$ 227,039	$ 267,104	$ 320,524	$ 373,946	$ 427,366
Walk-up	$ 196,541	$ 196,541	$ 227,412	$ 301,281	$ 370,329	$ 435,791
Elevator	$ -	$ 238,389	$ 278,381	$ 370,316	$ 459,193	$ 543,165

TDC	Number of Bedrooms					
Type of Unit	0	1	2	3	4	5
Detached/Semi-Detached	$ -	$ 440,296	$ 520,070	$ 625,027	$ 732,041	$ 838,713
Row House	$ -	$ 397,318	$ 467,432	$ 560,917	$ 654,406	$ 747,891
Walk-up	$ 343,946	$ 343,946	$ 397,970	$ 527,242	$ 648,076	$ 762,635
Elevator	$ -	$ 417,180	$ 487,167	$ 648,052	$ 803,587	$ 950,539

APPENDIX E – REPLACEMENT HOUSING FACTOR FUNDS APPENDIX

REPLACEMENT HOUSING FACTOR FUNDS APPENDIX

In September 2013, the PHA Board of Commissioners approved an Amendment to the MTW Agreement that allows Replacement Housing Factor (RHF) funds to be included in the MTW Block Grant. HUD executed the RHF Amendment on February 26, 2014.

Pursuant to the RHF Amendment and related HUD guidance, PHA is providing the following information:

- RHF funds projected for FY 2015 are included in the Sources and Uses tables of the Plan.
- PHA intends to combine its existing and future RHF funds into the MTW Block Grant.
- PHA intends to accumulate RHF funds as allowed under the RHF Amendment, Option 3.
- PHA will secure the commitments for the required one-third leverage of its 2nd Increment RHF funds prior to developing the public or affordable housing under the porportionality requirements of the RHF Amendment, Option3.
- PHA will develop the number of affordable and/or public housing units required in accordance with the proportionality test under the RHF Amendment, Option3.
- RHF grants that PHA intends to combine into the MTW Block Grant are listed on the table below.

Fiscal Year	Grant Number	Obligation End Date	Expenditure End Date
2014	PA26R002501-14	10/29/2019	10/29/2021
2014	PA26R002502-14	10/29/2019	10/29/2021
2013	PA26R002501-13	10/29/2019	10/29/2021
2013	PA26R002502-13	10/29/2019	10/29/2021
2012	PA26R002501-12	10/29/2015	10/29/2017
2012	PA26R002502-12	10/29/2015	10/29/2017
2011	PA26R002501-11	10/29/2015	10/29/2017
2011	PA26R002502-11	10/29/2015	10/29/2017
2010	PA26R002501-10	10/29/2014	10/29/2016
2010	PA26R002502-10	10/29/2015	10/29/2017
2009	PA26R002501-09	10/29/2014	10/29/2016
2009	PA26R002504-09	10/29/2014	10/29/2016
2008	PA26R002501-08	10/29/2014	10/29/2016
2008	PA26R002502-08	10/29/2014	10/29/2016

APPENDIX F – ANNUAL STATEMENT/PERFORMANCE AND EVALUATION REPORT

Annual Statement/Performance and Evaluation Report
Capital Fund Program (CFP) Part I: Summary

PHA Name:	Grant Type and Number	Federal FY of Grant:
PHILADELPHIA HOUSING AUTHORITY	Capital Fund Program Grant No: PA26P00250113	2013

Original Annual Statement **Reserve for Disasters/Emergencies** X **Revised Annual Statement (Revision No: 1)**
Performance and Evaluation Report for Program Year Ending: **Final Performance and Evaluation Report**

Line No.	Summary by Development Account	Total Estimated Cost			
		Original Budget	**Revised Budget**	**Obligated**	**Expended**
1	Total Non-CFP Funds				
2	1406 Operations	9,000,000.00	7,153,944.75	0.00	0.00
3	1408 Management Improvements	2,214,067.24	527,159.00	0.00	81,054.00
4	1410 Administrative Costs	4,032,685.00	3,974,562.00	2,636,945.85	3,936,328.00
5	1411 Audit	0.00	0.00	0.00	0.00
6	1415 Liquidated Damages	0.00	0.00	0.00	0.00
7	1430 Fees and Costs	1,533,000.00	1,518,295.00	117,495.04	372,316.14
8	1440 Site Acquisition	0.00	0.00	0.00	0.00
9	1450 Site Improvements	1,367,052.00	4,018,997.00	20,220.00	180,899.50
10	1460 Dwelling Structures	9,250,058.99	8,276,598.25	603,622.22	3,145,419.74
11	1465.1 Dwelling Equipment-Nonexpendable	0.00	0.00	0.00	0.00
12	1470 Non-Dwelling Space	0.00	0.00	0.00	0.00
13	1475 Non-Dwelling Equipment	562,518.01	549,320.00	52,973.64	276,952.02
14	1485 Demolition	159,870.00	159,870.00	10,000.00	11,493.61
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration	0.00	1,528,760.00	0.00	0.00
17	1495 Relocation	146,000.00	152,075.00	7,464.00	40,554.36
18	1499 Development Activities	0.00	0.00	0.00	0.00
19	1501 Collaterization or Debt Service	12,061,598.76	11,886,048.00	9,903,071.25	9,937,508.45
20	1502 Contingency				
21	Amount of Annual Grant (Sum of lines 2-20)	40,326,850.00	39,745,629.00	13,351,792.00	17,982,525.82
22	Amount of Line 21 Related to LBP Activities				
23	Amount of Line 21 Related to Section 504 Compliance	1,095,000.00	1,095,012.00	37,371.18	198,050.68
24	Amount of Line 21 Related to Security - Soft Costs				
25	Amount of Line 21 Related to Security - Hard Costs				17983066
26	Amount of Line 21 Related to Energy Conservation Measures				-540.18

Signature of Executive Director and Date	**Signature of Public Housing Director and Date**
Kelvin A. Jeremiah, President & CEO	

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:			**Grant Type and Number**							
Philadelphia Housing Authority			Capital Fund Program Grant No: PA26P00250114							2014
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
701701	Finance	701100	Operating Subsidy	1406		1,446,969	5,995,135		0	
			Total Operating Subsidy Cost	**1406**		**1,446,969**	**5,995,135**	**0**	**0**	
			Management Improvements							
709709	ISM	700176	Computer Software Acquisition,Production Support,Customization,and Program Implementation	1408		550,000	550,000		92,209	PHA wide system support, upgrades, implemetations.
			Total Management Improvement Cost	**1408**		**550,000**	**550,000**	**0**	**92,209**	
			Administrative Costs							
000	PHA-Wide	700183	Administrative Salaries and Benefits	1410		3,664,331	3,664,331		1,061,919	Administrative Salaries and Benefits
			Total Administrative Cost	**1410**		**3,664,331**	**3,664,331**	**0**	**1,061,919**	
			Fees and Costs							
800800	Development	700185	A&E, Legal and Consultant Services	1430		1,000,000	1,000,000			pre-development and design cost

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:			**Grant Type and Number**							
Philadelphia Housing Authority			Capital Fund Program Grant No: PA26P00250114							2014
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
401401	Housing Operations	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430	1 LS	500,000	500,000			To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
			Total Professional Services Costs and Fees	**1430**		**1,500,000**	**1,500,000**	**0**	**0**	
			Site Acquisition							
			Total Site Acquisition Costs	**1440**		**0**	**0**	**0**	**0**	
			PHA- Wide Site Improvements							
401401	Housing Operations	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	450,000	450,000			Annual inspections will be about $150,000 for the inspection of 500 chair lifts and $130,000 of repairs to various sites for 504 accomodations.
			Total PHA-Wide Site Improvements			**450,000**	**450,000**	**0**	**0**	
			Total Site Improvements	**1450**		**450,000**	**450,000**			

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:			**Grant Type and Number**							
Philadelphia Housing Authority			Capital Fund Program Grant No: PA26P00250114							2014
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
			PHA Wide Dwelling Structures							
039	West Park Apts	701165	Elevator Repairs	1460	1 LS	7,800,000	7,800,000			Replace Elevator System in all 3 High Rises at West Park Apartments
049	Morton Homes	700875	Electrical distribution systems	1460	1 LS	1,500,000	1,500,000			Remove/replace all subpanels; remove/replace main electrical distribution panel; remove/replace existing electrical EMT condute and cable from
001	Johnson Homes	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
003	Richard Allen	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
010	Raymond Rosen	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
013	Wilson Park	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
014	Norris Apts	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
015	Harrison Plaza	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
018	Arch Homes	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name:

Philadelphia Housing Authority

Grant Type and Number

Capital Fund Program Grant No: PA26P00250114

2014

Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
020	Soring Garden Apts	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
029	Hill Creek	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
030	Abbottsford	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
031	Bartram Village	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
032	Oxford Village	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
034	Whitehall	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
039	West Park Apts	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
042	Champlost Home	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
046	Haverford Homes	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
049	Morton Homes	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name: Philadelphia Housing Authority

Grant Type and Number

Capital Fund Program Grant No: PA26P00250114

2014

Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
050	Blumberg	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
054	Parkview	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
055	Fairhill Apts	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
063	Katie B. Jackosn	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
066	Holmecrest	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
076	Emlen Arms	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
077	Bentley Hall	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
079	Plymouth Hall	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
114	Gladys B. Jacobs	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
901	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name:	**Grant Type and Number**
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250114 2014

Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
902	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
903	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
904	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
905	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
906	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
907	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
908	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
909	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
910	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	25,000	25,000			504 Unit Modification/Fair Housing
			Total PHA-Wide Dwelling Unit Improvements			**10,200,000**	**10,200,000**	**0**	**0**	

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:			**Grant Type and Number**							
Philadelphia Housing Authority			Capital Fund Program Grant No: PA26P00250114							2014
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
			<u>Scattered Sites Dwelling Unit Renovation</u>							
901	Haddington	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000	600,000	0	0	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
902	Mantua	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000	600,000			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
903	Kingsessing	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000	600,000			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
904	Germantown/Hunting Park	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000	600,000			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name:	**Grant Type and Number**
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250114

2014

Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
905	Fairhill Square	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000	600,000			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
906	Francisville	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000	600,000			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
907	Ludlow	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000	600,000			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
908	Susquehanna	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000	600,000			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
909	Strawberry Mansion	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000	600,000			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:			**Grant Type and Number**							
Philadelphia Housing Authority			Capital Fund Program Grant No: PA26P00250114							2014
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
910	Oxford Jefferson	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000	600,000			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
			Scattered Site Unit Renovation Total		**235 units**	**6,000,000**	**6,000,000**	**0**	**0**	
			Total Dwelling Structures	**1460**		**16,200,000**	**16,200,000**			
			<u>Non-Dwelling Structures</u>	**1470**						
			Total Non-Dwelling Structures	**1470**		**0**	**0**			
			<u>Non-Dwelling Equipment</u>							
707707	Budget	700798	Community Space F & EM	1475	1LS	25,000	25,000			As needed replacement of office equipment throughout PHA office and site locations

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name:	**Grant Type and Number**
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250114

2014

Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
709709	ISM	700180	Computer Infrastructure Upgrades, Computer Lab Support, PHA Office and ISM Support Services	1475	1 LS	250,000	250,000		3,311	The purchase of 200 replacement computers throughout PHA. Also includes server and network upgrades/replacements,
709709	ISM	700614	Telephone Infrastructure Upgrades	1475	1 LS	100,000	100,000			Telephone equipments including but not limited to network switches and IVR upgrades
455455	Housing Operations Specialty Crew	701203	Maintenance Equipment	1475	1 LS	75,000	75,000			repair/replace maintenance equipment including but not limited to landscaping, snow removal and small construciton equipment. To be used through
			Total Non-Dwelling Equipment	**1475**		**450,000**	**450,000**	**0**	**3,311**	
401401	Housing Operations	700882	Demolition	1485	1 LS	377,750	377,750			Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspectors
			Total Demolition	**1485**		**377,750**	**377,750**	**0**	**0**	
401401	Housing Operations	700854	Relocation	1495	1 LS	150,000	150,000			Relocations as needed through out PHA.
			Total Relocation	**1495**		**150,000**	**150,000**	**0**	**0**	
			Total Development	**1499**		**0**	**0**	**0**	**0**	

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name:	**Grant Type and Number**
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250114

2014

Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
700700	Finance	701491	Bond Debt Service - Principle	1501	1 LS	9,721,849	5,173,683			bond debt principle payment for Tasker Bond
700700	Finance	701498	Bond Debt Service - Interest	1501	1 LS	2,132,411	2,132,411			bond debt interest payment for Tasker Bond
			Total Debt Service	**1501**		**11,854,260**	**7,306,094**	**0**	**0**	
			GRAND TOTAL			**36,643,310**	**36,643,310**	**0**	**1,157,439**	

APPENDIX G
RENTAL ASSISTANCE DEMONSTRATION (RAD) SIGNIFICANT AMENDMENT

Appendix G includes:

- RAD Significant Amendment to FY 2016 MTW Plan
- Board Resolution Approving RAD Significant Amendment
- Public Comment Period and Hearing Notice
- Certification of Consistency with the Consolidated Plan
- Civil Rights Certification

Philadelphia Housing Authority
Fiscal Year 2016 Moving to Work Annual Plan Amendment
Rental Assistance Demonstration Significant Amendment for
Southwark Plaza Apartments and
Scattered Site Transfer of Assistance Units

The Philadelphia Housing Authority (PHA) is amending its Fiscal Year 2016 Moving to Work (MTW) Annual Plan to incorporate additional information as required by the US Department of Housing and Urban Development (HUD) concerning the planned conversion of certain public housing units to project-based assistance under the Rental Assistance Demonstration (RAD) program. This Significant Amendment covers the Southwark Plaza Apartments public housing development (also known as Courtyard Apartments at Riverview) and 203 scattered site public housing units that are currently vacant and uninhabitable.

Background

In December 2013, the PHA Board of Commissioners authorized the submission of several applications to HUD under the RAD program. The Board's approval came after a series of public meetings were held to inform existing residents about the RAD program and their rights under a proposed RAD conversion.

In March 2015, HUD issued a series of RAD award letters to PHA that approved the applications for RAD conversion, subject to PHA meeting all of the conditions and requirements of the RAD program. This included award letters for Southwark Plaza Apartments and currently vacant and unoccupied scattered site public housing units. The award letters serve as HUD's Commitment to Enter into a Housing Assistance Payments Contract (CHAPs) for the subject public housing developments. Accordingly, PHA intends to proceed with RAD conversion under the guidelines of PIH Notice 2012-32, REV-2 dated June 15, 2015 ("HUD RAD Notice") and any other successor Notices issued by HUD. Any necessary resident relocation related to RAD conversions will be performed in accordance with the HUD RAD Notice, HUD Joint Housing Notice H-2014-09/PIH-2014-17 and any other successor Notices issued by HUD.

One of the conditions of the CHAP is that PHA submit a Significant Amendment to the MTW Annual Plan that incorporates required information on PHA's RAD conversion plans. This document provides the required information and serves as PHA's RAD Significant Amendment for the subject properties noted above. (Note also that PHA intends to propose further Significant Amendment(s) for additional HUD-approved RAD conversions at a future date.) PHA is providing a thirty-day public comment period and will conduct a Public Hearing to allow residents and the general public an opportunity to review and comment on the RAD Significant Amendment. Following this period, the PHA Board of Commissioners will conduct a vote on the RAD Significant Amendment at a public meeting.

RAD Conversion Plan

This Significant Amendment provides information on PHA's plans to convert public housing units to project-based assistance under RAD as follows:

1. Southwark Plaza Apartments (also known as Courtyard Apartments at Riverview) is a mixed finance development owned by Southwark Plaza Apartments Limited Partnership, which consists of 470 public housing units. These existing units will be converted under the RAD program from public housing assistance to Project Based Voucher (PBV) assistance; and,
2. A total of 203 scattered site public housing units owned by PHA that are currently vacant and uninhabitable. The public housing assistance for these scattered site units will be converted to PBV assistance at four (4) developments owned by third parties under the "transfer of assistance" provisions of the HUD RAD Notice.

Attachment 1 includes current information on each development or Asset Management Project (AMP) proposed for RAD conversion. For each development or AMP approved for RAD conversion, Attachment 1 includes the following information:

Current Units:	Total number of units, bedroom size distribution and unit type.
Post-Conversion Units:	If applicable, any changes proposed to the current number of units, the bedroom size distribution or the unit type including de minimis reductions. No unit reductions are proposed under this Significant Amendment.
Transfer of Assistance:	Whether PHA intends to transfer assistance to another development as part of the RAD conversion and, if so, the location, number of units, bedroom size distribution, and unit type where known. PHA intends to transfer assistance from 203 vacant and uninhabitable units located in five AMPs to four (4) new or substantial rehab developments.
PBV or PBRA:	Whether PHA intends to convert the development to the Project Based Voucher (PBV) program or to the Project Based Rental Assistance (PBRA) program, along with information on resident rights, resident participation, waiting list and grievance procedures applicable to each program. PHA intends to convert assistance to the PBV program.
Capital Fund Impact:	The current amount of Capital Fund dollars received prior to RAD conversion. Developments converted through the RAD program are not eligible for Public Housing Capital Funds.
Transfer of Waiting List:	How existing waiting lists will be addressed as part of the conversion.

Conversion to Project Based Vouchers or Project Based Rental Assistance

Public housing developments that are converted to project-based assistance will no longer be subject to HUD rules and regulations pertaining to the public housing program. Upon conversion to RAD, the former public housing units will be subject to the rules and regulations pertaining to either the PBV or PBRA programs, depending on which program option is selected by PHA.

HUD has modified the PBV and PBRA program rules and regulations to incorporate additional provisions that apply solely to units converted under RAD. These additional provisions provide important protections to current residents of public housing that are impacted by a RAD conversion.

PHA intends to convert the RAD units listed in Attachment 1 to the PBV program. As part of the conversion initiative, PHA will adopt all required RAD PBV rules, and will modify its existing Housing Choice Voucher Program Administrative Plan as needed to incorporate those rules related to resident rights, resident participation, waiting list, lease, waiting list, grievance processes and other areas.

Attachment 2 provides information on the RAD PBV program as required by the HUD RAD Notice and the HUD Joint Housing PIH Notice H-2014-9/PIH-2014-7 related to resident rights and participation, waiting list and grievance procedures.

Capital Fund Budget

Conversion of existing public housing developments under the RAD program will enable PHA to leverage existing funds to secure additional private and other funding. This new funding will be used to undertake long-deferred capital improvements and, in instances where transfer of assistance is involved, to construct or rehabilitate new affordable housing units.

PHA currently receives HUD Capital Funds on an annual basis, subject to Congressional appropriations for the majority of its public housing units. Attachment 1 includes the current Capital Fund allocation for each RAD conversion site. Upon conversion to RAD, PHA will no longer receive a Capital Fund allocation for units that have been converted and the annual Capital Fund grant will be decreased.

The total estimated reduction in PHA Capital Funds on an annual basis for the subject units covered under this Significant Amendment is $941,291, based on FY2015 funding levels. Over a five year period, the estimated Capital Fund reduction is $4,706,455, based on FY2015 funding levels. The actual amount of reduction may vary depending on Congressional appropriations. As RAD conversions are completed, PHA will modify its existing capital plans to reflect the reduction in funding and change in work scopes.

The RAD conversion will not impact PHA's existing Capital Fund Financing Program (CFFP) obligations. PHA will not utilize Replacement Housing Funds (RHF) to support the RAD conversions for the subject units described in this Significant Amendment.

Site and Neighborhood Standards for Transfer of Assistance Conversions

PHA has analyzed the replacement sites for those RAD conversions covered under this Significant Amendment that involve transfer of assistance. All proposed sites comply with the HUD Site and Neighborhood Standards as defined in 24 CFR 983 and the current MTW Site and Neighborhood Standards as defined in PHA's MTW Agreement.

Relocation Plan

All of the scattered site units proposed for RAD conversion under this Significant Amendment are currently vacant; therefore, no relocation will be required. At Southwark Plaza Apartments, any necessary relocation will conform to the applicable requirements of the HUD RAD Notice and the Joint Housing/PIH Notice H-2014-09/PIH 2014-07.

Compliance

PHA is not presently subject to a voluntary compliance agreement, consent order, consent decree, final judicial ruling or administrative ruling that has any relation to or impact on the planned RAD conversion.

Moving To Work

PHA may utilize MTW Block Grant fungibility and programmatic flexibility to support the RAD conversion effort subject to any necessary Board and HUD approvals. PHA certifies that regardless of any funding changes that may occur as a result of conversion under RAD, PHA will continue to administer and maintain service levels for its remaining portfolio of public housing units. PHA will do this by utilizing available funding including Public Housing Operating Fund, Capital Fund, and Tenant Rental Income.

Significant Amendment Definition

As part of the RAD conversion initiative, a Significant Amendment to the MTW Plan will not be required for the following RAD-specific actions, provided that the adjustments to the RAD plans are authorized by the Board of Commissioners in the normal course of business:

- Changes to the Capital Fund budget produced as a result of each approved RAD conversion regardless of whether the proposed conversion will include use of additional Capital Funds;

- Decisions to apply MTW funding or programmatic flexibility to post-conversion RAD developments;

- Decisions or changes related to the ownership and/or financing structures for each approved RAD conversion including decisions to allocate PHA financial resources as a source of funds to support the RAD conversion initiatives;

- Changes to the construction and rehabilitation plans and scheduled for each approved RAD conversion;

- Changes to the project names or sponsor entity names;

- Changes in the bedroom size distribution or the number of de minimis unit reductions up to the 5% permitted under RAD program rules; and,

- Decisions to convert to either Project Based Vouchers or Project Based Rental Assistance.

Philadelphia Housing Authority
Fiscal Year 2016 Moving to Work Annual Plan Amendment
Rental Assistance Demonstration Significant Amendment
Attachment 1 – Information on Public Housing Developments to be Converted

The following pages provide required information on each development and/or Asset Management Project (AMP) to be converted from public housing assistance to Project Based Voucher (PBV) assistance under the Rental Assistance Demonstration (RAD) program.

RAD Significant Amendment Attachment 1

Pre-Conversion Development Name	Southwark Plaza
PIC Development ID #	PA002000121
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY15)	382,050

Pre-Conversion Total Units	470
Pre-Conversion Unit Type	Family
Pre-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	120
2 BR	163
3 BR	161
4 BR	26
5 BR	0
6 BR	0

Post-Conversion Total Units	470
Post-Conversion Unit Type	Family
Post-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	120
2 BR	163
3 BR	161
4 BR	26
5 BR	0
6 BR	0

Transfer of Assistance	No
De Minimis Reduction	N/A
Transfer of Waiting List	Following conversion to PBV under RAD, applicants on the existing Southwark Plaza site-based waiting list will be transferred to a PBV site-based waiting list. No changes are planned to waiting list preferences, and applicants will maintain their original date and time of application. The owner will manage and maintain the site-based waiting list in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Pre-Conversion Development Name	Haddington Scattered Sites
PIC Development ID #	PA002000901
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY15)	10,014
Pre-Conversion Total Units	40
Pre-Conversion Unit Type	Family
Pre-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	0
2 BR	1
3 BR	30
4 BR	7
5 BR	1
6 BR	1

Post-Conversion Total Units	40
Post-Conversion Unit Type	Seniors
Post-Conversion Development Name/Address	NewCourtland at Allegheny II, 1900 West Allegheny Avenue, Philadelphia
Post-Conversion Sponsor	NewCourtland Elder Services
Post-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	40
2 BR	0
3 BR	0
4 BR	0
5 BR	0
6 BR	0

Transfer of Assistance	Yes
De Minimis Reduction	N/A
Transfer of Waiting List	A new site-based waiting list will be established for the development prior to initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Pre-Conversion Development Name	Oxford Jefferson Scattered Sites
PIC Development ID #	PA002000910
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY15)	219,944
Pre-Conversion Total Units	88
Pre-Conversion Unit Type	Family
Pre-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	4
2 BR	24
3 BR	60
4 BR	0
5 BR	0
6 BR	0

Post-Conversion Total Units	88
Post-Conversion Unit Type	Homeless Individuals
Post-Conversion Development Name/Address	2415 North Broad Street, 2413-29 North Broad Street, Philadelphia
Post-Conversion Sponsor	Project Home
Post-Conversion Bedroom Size	

	# of Units
0 BR	88
1 BR	0
2 BR	0
3 BR	0
4 BR	0
5 BR	0
6 BR	0

Transfer of Assistance	Yes
De Minimis Reduction	N/A
Transfer of Waiting List	A new site-based waiting list will be established for the development prior to initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Pre-Conversion Development Name	Germantown Scattered Sites
PIC Development ID #	PA002000904
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY15)	95,584
Pre-Conversion Total Units	38
Pre-Conversion Unit Type	Family
Pre-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	0
2 BR	7
3 BR	31
4 BR	0
5 BR	0
6 BR	0

Post-Conversion Total Units	38
Post-Conversion Unit Type	Family
Post-Conversion Development Name/Address	Roberto Clemente Homes, 3921-3961 North 5th Street, Philadelphia
Post-Conversion Sponsor	Nueva Esperanza Inc.
Post-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	0
2 BR	28
3 BR	10
4 BR	0
5 BR	0
6 BR	0

Transfer of Assistance	Yes
De Minimis Reduction	N/A
Transfer of Waiting List	A new site-based waiting list will be established for the development prior to initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Pre-Conversion Development Name	Kinsessing Scattered Sites
PIC Development ID #	PA002000903
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY15)	93,404
Pre-Conversion Total Units	37
Pre-Conversion Unit Type	Family
Pre-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	1
2 BR	7
3 BR	11
4 BR	18
5 BR	0
6 BR	0

Post-Conversion Total Units	37
Post-Conversion Unit Type	Homeless Families
Post-Conversion Development Name/Address	HELP Philadelphia V, 843-57 North 12th Street, Philadelphia
Post-Conversion Sponsor	HELP Development Corp.
Post-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	27
2 BR	10
3 BR	0
4 BR	0
5 BR	0
6 BR	0

Transfer of Assistance	Yes
De Minimis Reduction	N/A
Transfer of Waiting List	A new site-based waiting list will be established for the development prior to initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

Fiscal Year 2016 Moving to Work Annual Plan Amendment
Rental Assistance Demonstration Significant Amendment
Attachment 2 – Project Based Voucher Program (PBV)

Information on resident rights and participation, waiting list and grievance procedures for Rental Assistance Demonstration (RAD) program conversions to the Project Based Voucher (PBV) program are included in this attachment:

HUD PIH Notice 2012-32, REV-2 dated June 15, 2015, Sections 1.C and 1.D

HUD Joint Housing Notice H-2014-09/PIH-2014-17 in its entirety

C. PBV Resident Rights and Participation.

1. **No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households.[24] Once that remaining household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement.

2. **Right to Return.** See section 1.4.A.4(b) regarding a resident's right to return.

3. **Renewal of Lease.** Since publication of the PIH Notice 2012-32 Rev 1, the regulations under 24 CFR § 983.257(b)(3) have been amended requiring Project Owners to renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.

4. **Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or $25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

[24] These protections (as well as all protections in this Notice for current households) apply when in order to facilitate repairs a household is relocated following the conversion and subsequently returns to the property, even if they are considered a "new admission" upon return.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "standard TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the standard TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the standard TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP
- Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies may not alter this requirement.

5. **Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are current FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any remaining PH FSS funds, to serve those FSS participants who live in units converted by RAD. Due to the

program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the FY15 Appropriations Act), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g. escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.[25] Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents.

6. **Resident Participation and Funding.** In accordance with Attachment 1B, residents of Covered Projects with converted PBV assistance will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

7. **Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

[25] The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

i. **Termination Notification**. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
   a. A reasonable period of time, but not to exceed 30 days:
      i. If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
      ii. In the event of any drug-related or violent criminal activity or any felony conviction;
   b. 14 days in the case of nonpayment of rent; and
   c. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

ii. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional procedural rights to comply with section 6 of the Act.

For issues related to tenancy and termination of assistance, PBV program rules require the Project Owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:
   a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi),[26] an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
      i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
      ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.

[26] § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate has been repealed.

b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
d. The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

8. **Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

   Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion e.g., due to loss of employment; tenants that move into the property following conversion, etc.,) is covered by this waiver.

9. **Jobs Plus.** Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance at that site unless significant re-location and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project.

10. **When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may only select an occupied unit to be included under the PBV HAP contract if

the unit's occupants are eligible for housing assistance payments (24 CFR §983.53(d)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR §983.258). Since the rent limitation under this Section of the Notice may often result in a family's TTP equaling or exceeding the gross rent for the unit, for current residents (i.e residents living in the public housing property prior to conversion), HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP contract when TTP equals or exceeds than the Gross Rent. Further, HUD is establishing the alternative requirement that the rent to owner for the unit equal the family's TTP until such time that the family is eligible for a housing assistance payment. HUD is waiving as necessary to implement this alternative provision, the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR 983.301 as modified by Section 1.6.B.5 of this Notice.[27] In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP contract. Assistance may subsequently be reinstated if the tenant becomes eligible for assistance. The PHA is required to process these individuals through the Form- 50058 submodule in PIC.

Following conversion, 24 CFR §983.53(d) applies, and any new families referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has vacated the property; and, if the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating" units have been permitted, Section 1.6.B.10 of this Notice.

[27] For example, a public housing family residing in a property converting under RAD has a TTP of $600. The property has an initial Contract Rent of $500, with a $50 Utility Allowance. Following conversion, the residents is still responsible for paying $600 in tenant rent and utilities.

11. **Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR 983.259 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR 983.259 is waived. MTW agencies may not modify this requirement.

D. PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.

2. **Additional Monitoring Requirement.** The PHA's Board must approve the operating budget for the Covered Project annually in accordance with HUD requirements.[28]

3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** This section has been moved to 1.4.A.13 and 1.4.A.14.

4. **Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:

    i. Transferring an existing site-based waiting list to a new site-based waiting list. If the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being

[28] For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of the evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list.

ii. Informing applicants on the site-based waiting list on how to apply for a PBV program-wide or HCV program-wide waiting list.

iii. Informing applicants on a public housing community-wide waiting list on how to apply for a voucher-wide, PBV program-wide, or site-based waiting list. If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the converted project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's public housing community-wide waiting list who wish to be placed onto the newly-established site-based waiting list must be done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).[29]

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA

[29] For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

5. **Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.

6. **Agreement Waiver.** This section has been moved to 1.6.(B)(7).

7. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of permanent debt during the HAP contract term, to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

8. **Administrative Fees for Public Housing Conversions during Transition Period**. For the remainder of the Calendar Year in which the HAP Contract is effective (i.e. "transition period"), RAD PBV projects will be funded with public housing funds. For example, if the project's assistance converts effective July 1, 2015, the public housing Annual Contributions Contract (ACC) between the PHA and HUD will be amended to reflect the number of units under HAP contract, but will be for zero dollars, and the RAD PBV contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time. .

   For fiscal years 2014 and 2015, PHAs operating HCV program received administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR § 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

   After this transition period, the section 8 ACC will be amended to include section 8 funding that corresponds to the units covered by the section 8 ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

9. **Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

   If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant-based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing an alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD.

   The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

   To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) and 24 CFR part 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

10. **Reserve for Replacement**. The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account covered under a General Depository Agreement (HUD-51999) or similar instrument, as approved by HUD, where funds will be held by the

Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines and as directed by HUD.

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

ASSISTANT SECRETARY FOR HOUSING-
FEDERAL HOUSING COMMISSIONER

Special Attention of:	**Notice** H 2014-09
Public Housing Agencies	PIH 2014-17
Public Housing Hub Office Directors	
Public Housing Program Center Directors	Issued: July 14, 2014
Regional Directors	
Field Office Directors	This notice remains in effect until amended,
RAD Transaction Managers	superseded, or rescinded.
	Cross Reference: PIH Notice 2012-32 (HA) REV 1

Subject: **Relocation Requirements under the Rental Assistance Demonstration (RAD) Program, Public Housing in the First Component**

1. Purpose

This Notice provides public housing agencies (PHAs)[1] and their partners with information and resources on applicable program and relocation assistance requirements when planning for or implementing resident moves as a result of a **Rental Assistance Demonstration (RAD)** conversion[2] under the first component of the demonstration.[3] This Notice provides guidance on RAD relocation requirements and requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA), as they relate to the public housing conversion process under the first component.[4]

[1] This Notice always uses the term "PHA" to refer to the owner of the project prior to and after the RAD conversion, even though, in some cases, the owner of the converted RAD project may be another public entity, a non-profit organization, or other owner (e.g., low-income housing tax credit owner). In addition, this Notice uses "PHA" to refer to the "displacing agency," a URA term that means the agency or person that carries out a program or project, which will cause a resident to become a displaced person. Projects vary and, for any specific task described in this Notice, may require substituting in a reference to a party that is more appropriate for a specific project.
[2] The content of this Notice should not be relied upon in carrying out any other activities funded under any other HUD program, except where specifically directed by HUD.
[3] The "first component" of RAD allows public housing and Moderate Rehabilitation properties to convert assistance; the "second component" refers to conversion of Rent Supplement, Rental Assistance Payment, and Moderate Rehabilitation properties upon contract expiration or termination.
[4] Relocation concerns and URA requirements apply to both components of RAD. This notice provides guidance only as to the first component.

Relocation assistance provided pursuant to public housing and RAD requirements is broader than URA relocation assistance requirements. Not all specific situations requiring relocation under RAD may trigger URA assistance requirements. In addition, whereas all qualifying residents[5] of a converting public housing project are eligible for relocation assistance under RAD, some residents or household members may not meet the statutory and regulatory requirements for eligibility under URA. This Notice supersedes PIH Notice 2012-32 (HA), REV-1, with respect to relocation matters. This Notice also specifically addresses when relocation may begin (see Section 9 below). As necessary, the Department will issue additional guidance on relocation issues and requirements as they relate to RAD.

2. Background

RAD allows public housing properties to convert assistance to long-term project-based Section 8 contracts. In many cases, a RAD project may require relocation of residents when properties undergo repairs, are demolished and rebuilt, or when the assistance is transferred to another site. PIH Notice 2012-32 REV-1 (see also FR Notice 5630-N-05, 78 FR 39759-39763 (July 2, 2013)) details RAD program requirements.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA) is a federal law that establishes minimum standards for federally-funded programs and projects that include the acquisition of real property (real estate) and/or displace persons from their homes, businesses, or farms as a result of acquisition, rehabilitation, or demolition of real property.[6] The URA will apply to acquisitions of real property and relocation of persons from real property that occurs as a direct result of acquisition, rehabilitation, or demolition for a project that involves conversion of assistance to Project-Based Voucher (PBV) or Project-Based Rental Assistance (PBRA) programs under RAD.

Additionally, all relocation conducted as part of a RAD conversion and all relocation assistance provided under URA must be consistent with applicable fair housing and civil rights laws, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973.

Because each RAD proposal varies in its scope, this Notice may not address each PHA's specific circumstances. RAD PHAs and participants should carefully review the regulations, notices, and guidance material referenced in this Notice. Any questions related to the applicability of these requirements should be referred to the RAD Transaction Managers (TM) or may be emailed to rad@hud.gov.

3. Applicable Legal Authorities

[5] The term "resident" as used in this Notice refers to eligible resident families of public housing residing in a property applying for participation in RAD or a property that undergoes a conversion of assistance through RAD.

[6] HUD Handbook 1378 (Tenant Assistance, Relocation, and Real Property Acquisition), available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/library/relocation/policyandguidance/handbook1378.

- RAD: Consolidated and Further Continuing Appropriations Act of 2012 (Public Law 112-55, approved November 18, 2011), with the implementing PIH Notice 2012-32, REV-1
- URA statute and implementing regulations: 49 CFR part 24
- FHEO: Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Fair Housing Act
- Section 104(d) of the Housing and Community Development Act of 1974, statute and implementing regulations (if CDBG and/or HOME funds are used): 24 CFR part 42, subpart C

4. Relocation Planning

If there is a possibility that residents will be relocated as a result of acquisition, demolition, or rehabilitation for a project converting under RAD, PHAs must undertake a planning process in conformance with URA in order to minimize the adverse impact of relocation (49 CFR 24.205(a)).

While a written Relocation Plan is not a requirement under RAD or URA, the Department strongly encourages PHAs to prepare a written Relocation Plan, both to establish their relocation process and to communicate this process consistently and effectively to all relevant stakeholders. Appendix 1 contains recommended elements of a Relocation Plan.

The following presents a general sequencing of relocation planning activities within the RAD milestones:

Stage	Activities
1. Prior to submission of RAD application	• Determine potential need for relocation • Meet with residents to discuss plans, communicate right to return, and solicit feedback • Provide *General Information Notice* (GIN) to residents • Survey residents to prepare Relocation Plan and relocation process cost estimate
2. After receipt of the Commitment to Enter into a HAP Contract (CHAP) Award	• Prepare Significant Amendment to PHA Plan • Assess and refine need for relocation • Develop a Relocation Plan (See Appendix 1 for recommended content) • Identify relocation housing options
3. Preparing Financing Plan (due to RAD Transaction Manager no later than 180 days following	• Budget for relocation expenses • Submit FHEO Accessibility & Relocation checklist (PHAs may submit Relocation Plan along with checklist)

Stage	Activities
CHAP award)	
4. Receipt of RAD Conversion Commitment (RCC)	• The date of issuance of the HUD RCC marks the date of "Initiation of Negotiations" (ION), as defined in the URA (49 CFR 24.2(a)(15)) • Provide residents with appropriate notice informing them if they will be relocated and any associated relocation assistance • Meet with residents to describe approved conversion plans and discuss required relocation
5. Closing/RAD conversion	• Generally, resident relocation should not begin until after the date of closing/conversion of assistance under RAD • PHAs must adhere to notification requirements (described in Paragraph 8 of this Notice): generally, a minimum of 30 days for residents to be temporarily relocated for up to a year, and 90 days for permanent relocation • PHAs seeking to move residents prior to closing must receive prior approval from HUD as described in Paragraph 9 of this Notice

5. Resident Right to Return

RAD program rules prohibit the permanent involuntary relocation of residents as a result of conversion. Residents that are temporarily relocated retain the right to return to the project once it has been completed and is in decent, safe, and sanitary conditions.[7] The period during which residents may need to be temporarily relocated is determined by the period of rehabilitation or construction, which will be specific to each project.

If proposed plans for a project would preclude a resident from returning to the RAD project, the resident must be given an opportunity to comment and/or object to such plans. If the resident objects to such plans, the PHA must alter the project plans to accommodate the resident in the converted project. If a resident agrees to such plans, the PHA must secure informed, written consent from the resident to receive permanent relocation assistance and payments consistent with URA and acknowledge that acceptance of such assistance terminates the resident's right to return to the project. In obtaining this consent, PHAs must inform residents of their right to return, potential relocation, and temporary and permanent housing options at least 30 days before residents must make a decision. The PHA cannot employ any tactics to pressure residents into

[7] Where the transfer of assistance to a new site is approved, residents of the converting project will have the right to reside in an assisted unit at the new site once rehabilitation or new construction is complete.

relinquishing their right to return or accepting permanent relocation assistance and payments.[8] A PHA may not terminate a resident's lease if it fails to obtain this consent.

PHAs must keep documentation of such information provided to residents and such consent by residents. While HUD does not require PHAs to submit documentation of obtaining this consent, PHAs and participants must properly brief residents on their housing and relocation options and must keep auditable written records of such consultation and decisions. HUD may request this documentation during a review of the FHEO Relocation and Accessibility Checklist or if relocation concerns arise.

Examples of project plans that may preclude a resident from returning to the converted RAD project include, but are not limited to:

- Changes in bedroom distribution (i.e. when larger units will be replaced with smaller units such that current residents would become under-housed or when smaller units will be replaced with larger units such that current residents would become over-housed);
- Where a PHA is reducing the number of assisted units at a property by a de minimis amount[9], but those units are occupied by assisted residents; or
- The reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to facilitate social service delivery.

In all scenarios where residents voluntarily accept permanent relocation to accommodate project plans, these residents are eligible for permanent relocation assistance and payments under URA. If a resident accepts permanent relocation assistance, the resident surrenders his or her right to return to the completed project.

6. <u>Relocation Assistance</u>

Under RAD, relocation assistance may vary depending on the length of time relocation is required.[10]

a. In instances when the PHA anticipates that a resident will be relocated for more than a year, the PHA must offer the resident the choice of:

    - Permanent relocation assistance and payments at URA levels; or
    - Temporary relocation assistance, including temporary housing, while the resident retains his or her right to return and reimbursement for all reasonable out-of-pocket expenses associated with the temporary relocation.

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[8] Persons with disabilities returning to the RAD project may not be turned away or placed on a waiting list due to a lack of accessible units. Their accessibility needs must be accommodated.

[9] A reduction in total number of assisted units at RAD project of 5% or less. (Section 1.5.B of PIH 2012-32 REV-1)

[10] Some residents may not qualify for relocation assistance under URA. A nonexclusive listing of persons who do not qualify as displaced persons under URA is at 49 CFR 24.2(a)(9)(ii). See also, Paragraph 1-4(J) of HUD Handbook 1378.

The PHA must give the resident no less than 30 days to decide between permanent and temporary relocation assistance. If the resident elects to permanently relocate with assistance at URA levels, the PHA must inform the resident that his or her acceptance of permanent relocation assistance terminates the resident's right to return to the completed RAD project.

b. In instances when a resident elects temporary relocation assistance and reoccupies a unit in the completed project within one year, the resident need not be offered permanent relocation assistance pursuant to URA.

   Great care must be exercised to ensure that residents are treated fairly and equitably. If a resident is required to relocate temporarily in connection with the project, his or her temporarily occupied housing must be decent, safe, and sanitary and the resident must be reimbursed for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation. These expenses include, but are not limited to, moving expenses and increased housing costs during the temporary relocation.

c. In the event that a resident elects to receive temporary relocation assistance and the temporary relocation exceeds one year, the resident becomes eligible for all permanent relocation assistance and payments under URA. (This assistance would be in addition to any assistance the person has already received for temporary relocation, and may not be reduced by the amount of any temporary relocation assistance.) In such event, the PHA shall give the resident the opportunity to choose to remain temporarily relocated for an agreed-to period (based on new information about when they can return to the completed RAD unit), or choose to permanently relocate with URA assistance.

   PHAs may not propose or request that a displaced person waive rights or entitlements to relocation assistance under the URA. If the resident elects to permanently relocate with URA assistance, the PHA must inform the person that the person's acceptance of URA relocation assistance to permanently relocate will terminate the person's right to return to the completed RAD project. Conversely, unless and until the resident elects to be permanently relocated, the resident may remain temporarily relocated with a right to return to the completed project.

7. Initiation of Negotiations (ION) Date

Eligibility for URA relocation assistance is generally effective on the date of initiation of negotiations (ION) (49 CFR 24.2(a)(15)). For RAD projects, the ION date is the date of the issuance of the RAD Conversion Commitment (RCC).

8. Resident Notification

When a project converting under RAD will include relocation of residents, notice must be provided to those resident households. For each notice listed below, one notice shall be given to each resident household. The purpose of these notifications is to ensure that residents are

informed of their potential rights and the relocation assistance available to them. During initial meetings with residents about RAD and in subsequent communications with residents related to relocation, the PHA should inform residents that if they choose to move after receiving a written GIN, but prior to receiving a RAD Notice of Relocation, they may jeopardize their eligibility for relocation assistance. However, PHAs should note that a resident move undertaken as a direct result of the project may still require relocation assistance and the resident may be eligible to receive permanent relocation assistance under the URA even though the PHA has not yet issued notices.

a. *General Information Notice* (49 CFR 24.203(a) & Handbook 1378, Paragraph 2-3(B))

As soon as feasible in the planning process, the PHA must provide each resident with a written GIN (see sample in Appendix 2) to provide a general description of the project, the activities planned, and the relocation assistance that may become available. URA regulations state that the GIN should be provided *as soon as feasible*. Under RAD, PHAs must provide GINs during the initial RAD resident meetings, before submitting a RAD application. GINs must do at least the following:

- Inform the resident that he or she may be displaced for the project and generally describe the relocation payment(s) for which the resident may be eligible, the basic conditions of eligibility, and the procedures for obtaining the payment(s);
- Inform the resident that he or she will be given reasonable relocation advisory services, including referrals to replacement properties, help in filing payment claims, and other necessary assistance to help the resident successfully relocate;
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she will not be required to move without at least 90 days advance written notice, and inform any person to be displaced from a dwelling that he or she cannot be required to move permanently unless at least one comparable replacement dwelling has been made available;
- Inform the resident that any person who is an alien not lawfully present in the United States is ineligible for relocation advisory services and relocation payments, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child (see 49 CFR 24.208(h) for additional information); and
- Describe the resident's right to appeal the PHA’s determination as to a person's eligibility for URA assistance.

b. *RAD Notice of Relocation*

If a resident will be relocated to facilitate the RAD conversion, the PHA shall provide notice of such relocation (RAD Notice of Relocation). The PHA shall issue this notice upon the PHA’s receipt of the RCC from HUD, which is the ION date.

If residents will not be relocated, notice of relocation is not required, but the PHA should

notify them that they are not being relocated.[11]

The RAD Notice of Relocation must conform to the following requirements:

- The notice must state the anticipated duration of the resident's relocation.
- PHAs must provide this notice a minimum of 30 days prior to relocation to residents who will be temporarily relocated.[12] Longer notice may be appropriate for persons who will be relocated for an extended period of time (over 6 months), or if necessary due to personal needs or circumstances.
- Residents whose temporary relocation is anticipated to exceed one year must be informed that they will have no less than 30 days to elect temporary or permanent relocation as described in Section 6 of this Notice. When timing is critical for project completion, the 30-day decision period can run concurrently with the 30-day notice period for temporary relocation and with the 90-day period for permanent relocation if the PHA makes available comparable replacement dwellings consistent with 24.204(a).
- Residents who will be permanently relocated must receive written notice a minimum of 90 days prior to relocation. This 90-day time period may only begin once the PHA has made available at least one comparable replacement dwelling consistent with 49 CFR 24.204(a).[13]
- The notice must describe the available relocation assistance, the estimated amount of assistance based on the individual circumstances and needs, and the procedures for obtaining the assistance. The notice must be specific to the resident and his or her situation so that the resident will have a clear understanding of the type and amount of payments and/or other assistance the resident household may be entitled to claim.
- The notice must explain the reasonable terms and conditions under which the resident may continue to lease and occupy a unit in the completed project.
- The notice must state that the PHA will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with any temporary move. These expenses include, but are not limited to, moving expenses and increased housing costs (rent, utilities, etc.).

c. *Notice of Intent to Acquire* (49 CFR 24.203(d))

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[11] HUD policy generally requires a "notice of non-displacement" in certain instances; the RAD program does not require this notice. Although the scope of this notice is limited to guidance for projects requiring relocation, PHAs should note, however, that there may be notification requirements for projects that do not involve relocation. The RAD conversion will terminate the resident's public housing lease and commence a PBV or PBRA lease, even when there is no relocation required. In such instances, state law may impose certain notification requirements. In addition, public housing regulations generally require 30 days' notice prior to lease termination. PHAs are encouraged to review public housing requirements set forth in 24 CFR parts 5 and 966.

[12] HUD may approve shorter notice periods based on an urgent need due to danger, health, or safety issues or if the person will be temporarily relocated for only a short period.

[13] PHAs should note that URA regulations also require, where possible, that three or more comparable replacement dwellings be made available before a resident is required to move from his or her unit.

For RAD projects involving acquisition, residents may be provided with a notice of intent to acquire ("*Notice of Intent to Acquire"*) prior to the ION date with HUD's prior approval. Once the Notice of Intent to Acquire is provided, a resident's eligibility for relocation assistance and payments is established. Therefore, the RAD Notice of Relocation must be provided in conjunction with or after the Notice of Intent to Acquire. A RAD Notice of Relocation would not otherwise be sent prior to the ION date.

Since residents who accept permanent relocation must receive 90 days advanced written notice prior to being required to move, providing residents the Notice of Intent to Acquire and RAD Notice of Relocation prior to the ION date may be necessary to provide sufficient notice of relocation to a resident in instances where there may not be 90 days between the issuance of the RCC (ION date) and the anticipated closing date. This allows the PHA to issue the notice earlier so that relocation may begin upon closing. This allows program participants to conduct orderly relocation upon closing, minimize adverse impacts on displaced persons, and to expedite project advancement and completion.[14]

d. *URA Notice of Relocation Eligibility – for residents whose temporary relocation exceeds one year* (49 CFR 24.203(b) & Handbook 1378, Paragraph 2-3(C))

After a resident has been temporarily relocated for one year, the PHA must provide a notice of relocation eligibility in accordance with URA requirements ("*Notice of Relocation Eligibility*"). This notice is not required if the resident has already accepted permanent relocation assistance.

The Notice of Relocation Eligibility must conform to URA requirements as set forth in 49 CFR Part 24, to HUD Handbook 1378 and to the following requirements:

- The PHA must provide updated information as to when it is anticipated that the resident will be able to return to the completed project.
- The resident may choose to remain temporarily relocated based upon such updated information or may choose to accept permanent URA relocation assistance in lieu of exercising the right to return.
- If the resident chooses to accept permanent URA relocation assistance and such assistance requires that the resident move, the URA requires such resident to receive 90 days advance written notice of the earliest date they will be required to move (i.e., 90-Day Notice, 49 CFR 24.203(c)). The PHA should be mindful that the 90-day time period may only begin once the PHA has made available at least one "comparable replacement dwellings" as set forth in 49 CFR 24.204(a).

9. <u>Initiation of Relocation</u>

[14] PHAs and program participants should note that, in most instances, it will be most appropriate for the acquiring entity to send this notice.

Unless otherwise approved by HUD, relocation may not begin until the date of closing of the RAD transaction and recordation of the RAD Use Agreement. PHAs must provide residents being temporarily relocated at least 30 days advance written notice of the required move. PHAs must give residents being permanently relocated at least 90 days advance written notice of the required move. This means PHAs are advised to plan carefully to account for this 30-day or 90-day notice period to ensure the closing is not delayed.

However, HUD is aware that, in rare cases, some project plans necessitate relocation prior to closing. With prior HUD approval, for projects involving acquisition, PHAs may relocate residents prior to the closing date subject to public housing requirements (see 24 CFR part 5 and 24 CFR 966). PHAs must contact their assigned RAD transaction manager (TM) to discuss plans as early as possible in the process to ensure compliance with all RAD and URA requirements.

If relocation prior to closing is desired, PHAs should submit to the TM the following information, as early as possible in the process:

- A written request for relocation prior to closing. The request must include justification of why the early relocation is necessary for the viability of the RAD transaction. Justification may include the presence of outside financing, such as Low Income Housing Tax Credit (LIHTC) awards, if the PHA can show that early relocation is necessary to meet critical LIHTC deadlines.
- FHEO Accessibility and Relocation Checklist.
- Evidence of intent to comply with public housing requirements, as applicable. Generally, public housing regulations require public housing residents to receive 30 days' notice prior to relocation and that such notice either be published in the PHA's admissions and continued occupancy policies (ACOP) or published elsewhere at least 30 days prior to receipt of such notice (24 CFR parts 5 and 966).

When seeking to relocate residents prior to closing, submission of this request as early as possible is preferred, prior to the 180-day Financing Plan milestone if possible (with Financing Plan submission following the request).

HUD reserves the right to request additional follow-up information, including a Relocation Plan and related budget, prior to approving such requests. PHAs must receive written HUD approval before beginning relocation of residents prior to closing.

Early planning and submission of the Financing Plan and FHEO checklist to HUD will ensure the PHA has built in the 30- or 90-day notice period prior to initiating relocation.

10. Fair Housing and Civil Rights Requirements

PHAs must comply with all applicable fair housing and civil rights laws, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973, when conducting relocation planning and providing relocation assistance. Further, communication must be provided in a manner that is effective for persons

with disabilities (24 CFR 8.6) and for person who are Limited English Proficient (see 72 FR 2732). This section discusses some of the PHA's obligations under these laws and regulations. However, the applicability of civil rights laws is not limited to the activities discussed in this section. PHAs conducting relocation activities should familiarize themselves with applicable civil rights statutes, regulations, and guidance, including but not limited to, those listed at the end of this section.

- Effective Communication for Persons with Disabilities: Communications and materials must be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 CFR 8.6), and as applicable, the Americans with Disabilities Act; and for persons who are limited English proficient (*see* 72 Fed Reg 2732). This includes ensuring that training materials are in appropriate alternative formats as needed, e.g., Braille, audio, large type, assistive listening devices, and sign language interpreters.

- Accessible Meeting Facilities for Persons with Disabilities: When holding public meetings, PHAs must give priority to methods that provide physical access to individuals with disabilities, i.e., holding the meetings, workshops, and briefings or any other type of meeting in an accessible location, in accordance with the regulations implementing Section 504 of the Rehabilitation Act of 1973 and Titles II and III of the Americans with Disabilities Act of 1990, as applicable. All programs and activities must be held in accessible locations unless doing so would result in an undue financial and administrative burden, in which case the PHA must take any action that would not result in such an alteration or such burden but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity, e.g., briefings at an alternate accessible, in-home briefing. Individuals with disabilities must receive services in the most integrated setting appropriate to their needs. The most integrated setting appropriate to the needs of qualified individuals with disabilities is a setting that enables individuals with disabilities to interact with nondisabled person to the fullest extent possible (28 CFR part 35, appendix B).

- Meaningful Access for Persons with Limited English Proficiency (LEP): PHAs must provide meaningful access to programs and activities for persons who have a limited ability to read, speak, or understand English. Any person with LEP who will be temporarily relocated or permanently displaced must have meaningful access to any public meetings regarding the project. In addition, any information provided to residents including, but not limited to, any notices required under the URA, should be provided in the appropriate language to persons with LEP. Generally, PHAs will be responsible for providing oral interpreters at meetings, including ensuring their competence, and covering any associated translation and interpretation costs.

- URA requires that PHAs provide persons who are unable to read or understand the notices, such as persons with disabilities or persons with LEP, with appropriate translation and counseling to ensure that they understand their rights and responsibilities and the assistance available to them (49 CFR 24.5). URA also requires that each notice indicate the name and telephone number of a person to contact with questions or for other

needed help (49 CFR 24.5). This notice should include the number for the telecommunication device for the deaf (TDD) or other appropriate communication device, if applicable (24 CFR 8.6(a)(2)).

- Comparable Housing for Persons with Disabilities: PHAs should identify the accessibility needs of residents to be relocated by consulting existing information (e.g., tenant characteristics forms, including identification of the need for accessible unit features; records of approved reasonable accommodations, and records of the presence of accessible unit features). For guidance on providing relocation assistance to persons with disabilities, see Exhibit 3-1 in HUD Handbook 1378.

- Advisory Services: PHAs should determine the advisory services that will be necessary to ensure a successful relocation program consistent with 49 CFR 24.205(c). Such advisory services may include housing counseling that should be facilitated to ensure that residents affected by the project understand their rights and responsibilities and the assistance available to them (49 CFR 24.205(c)). Advisory counseling must also inform residents of their fair housing rights and be carried out in a manner that satisfies the requirements of Title VI of the Civil Rights Act of 1964, the Fair Housing Act, and Executive Order 11063 (49 CFR 24.205(c)(1)). In addition, PHAs should inform residents that if they believe they have experienced unlawful discrimination, they may contact HUD at 1-800-669-9777 (Voice) or 1-800-927-9275 (TDD) or at http://www.hud.gov.

Fair Housing References:

- Section 504 of the Rehabilitation Act of 1973
- Regulations: 24 CFR part 8
- Fair Housing Act Regulations: 24 CFR part 100
- Title VI of the Civil Rights Act of 1964
- Regulations: 24 CFR part 1
- Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (LEP Guidance) (72 FR 2732)
- Exhibit 3-1 Compliance with Section 504 of the Rehabilitation Act in HUD Handbook 1378 (Tenant Assistance Relocation and Real Property Acquisition)

11. Other Requirements

a. Public Housing Program Compliance
PHAs should note that public housing resident provisions related to occupancy and termination, including grievances and related hearings, will remain in effect until the execution of the new PBV or PBRA Housing Assistance Payment (HAP) contract.

b. Evictions for Cause
If the PHA determines that a resident was evicted in accordance with applicable state and local law for serious or repeated violation of material terms of the lease, and the eviction was not undertaken for the purpose of evading the obligation to make available URA payments and other assistance, the resident is not entitled to relocation payments and assistance under the URA (49 CFR 24.206).

Jemine A. Bryon
General Deputy Assistant Secretary for
Public and Indian Housing

Carol Galante, Federal Housing
Commissioner – Assistant Secretary for
Housing

APPENDICES

Appendix 1
Recommended Relocation Plan Contents

Appendix 2
Sample RAD General Information Notice (GIN)

Appendix 3
Sample RAD Notice of Relocation (for relocation anticipated for a year or less)

Appendix 4
Sample RAD Notice of Relocation (for relocation anticipated for more than a year)

Appendix 5
Sample Notice of Eligibility for URA Relocation Assistance (for residents who have been temporarily relocated for more than a year)

Appendix 1: RECOMMENDED RELOCATION PLAN CONTENTS

While written Relocation Plans are not required under RAD or URA, the Department strongly encourages PHAs to document their relocation planning process and procedures in a written Relocation Plan. The following provides suggested content for Relocation Plans.

I. Project Summary

The Relocation Plan should provide a general description of and purpose for the project (e.g., year built, location, number of units, configuration, occupancy information, and funding sources).

The basic components of a plan include:

- A general description of the project and the site, including acquisition, demolition, rehabilitation, and construction activities and funding sources;
- A detailed discussion of the specific steps to be taken to minimize the adverse impacts of relocation, including when transferring the assistance to a new site;
- Information on occupancy (including the number of residents, residential owner-occupants and non-residential occupants, if any, to be permanently or temporarily relocated);
- Information on relocation needs and costs (including the number of residents who plan to relocate with Section 8 assistance);
- General moving assistance information;
- Temporary move assistance (including information on the duration of temporary moves);
- Permanent move assistance; and
- Appeals process.

II. Resident Return and Re-occupancy Policies

For residents that will be temporarily relocated, the plan should include the criteria that will be used to determine the priority for residents to re-occupy units at the project after rehabilitation, demolition, and/or construction is completed. For example, if units will come online in stages, the plan should outline how the PHA will determine when each resident will return to the project. PHAs should ensure that any written return or re-occupancy policy is compliant with related RAD requirements, such as the right-to-return policy and the “no re-screening upon conversion” policy, as described in the RAD Notice.

III. Summary of Moving Costs

The plan should include a summary of moving costs, identified by move types, including the following:

Temporary Moves

- Number of and cost amount for two-way moves (i.e., a move to another unit and then a return move) within the same building/complex.
- Number of and cost amount for two-way moves to a unit not in the same building/complex, carried out by the PHA.
- Number of and cost amount for two-way moves to a unit not in the same building/complex not carried out by the PHA.

Permanent Moves

- Number of and cost amount for one-time moves into another unit in the same building/complex.[15]
- Number of and cost amount for one permanent move to a unit not within the same building/complex, carried out by the PHA.
  PHAs should note that if a residential move is carried out by the PHA at no cost to the resident, this per-household estimate must include the required dislocation allowance (currently $100). The URA Fixed Residential Moving Cost Schedule lists the most current dislocation allowance:
  http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm
- Number of and cost amount for one permanent move to a unit not within the same building/complex that is not carried out by the PHA.

IV. Temporary Relocation Assistance

The PHA will assist residents who are required to move temporarily. At the Initiation of Negotiations (ION), the PHA will send a RAD Notice of Relocation to residents who will be relocated. Appendices 3 and 4 of this Notice contain sample RAD Notices of Relocation to be provided to residents that will be temporarily relocated.

The plan should detail the temporary relocation assistance the PHA will provide for residents (Paragraph 2-7 of HUD Handbook 1378). This assistance includes:

- Temporary Housing - The PHA will provide temporary housing that is decent, safe, and sanitary on a nondiscriminatory basis for residents who are relocated temporarily. The PHA will also pay for reasonable increased housing costs that the resident incurs in connection with the temporary relocation.

  NOTE: If a resident's relocation exceeds one year, the PHA must then issue a *Notice of Relocation Eligibility* (49 CFR 24.203(b)) to the resident and offer the resident permanent

[15] A resident who moved to another unit in the same building/complex may be considered a displaced person under URA if the resident moves from the building/complex permanently and was not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move within the same building/complex and/or if other conditions of the move within the building/complex were not reasonable.

relocation assistance and payments at URA levels. The PHA must provide this notice to affected residents as soon as the temporary relocation exceeds one year.

- Packing and Moving Assistance - Since most residents prefer to pack their own personal possessions and items of value, they should be provided packing instructions, boxes, markers, and tape for the move. If assistance in packing is needed, the PHA should provide the resident with information on how to request this assistance. The PHA is responsible for covering all reasonable moving expenses incurred in connection with temporarily relocating a resident. The PHA may reimburse the resident's out-of-pocket moving expenses and/or directly carry out the move.

- Payment for Temporary Relocation Moving Expenses - The plan should also indicate how the PHA intends to provide or reimburse for moving services and expenses. The PHA can choose to do one or more of the following:
  - Undertake the moves itself, using force account labor or a moving company;
  - Use PHA's contractor or moving company;
  - Carry out moves with employees of the PHA;
  - Reimburse residents for all actual and reasonable moving costs.

  NOTE***:*** The PHA will not make fixed payments since such payments may not be representative of actual reasonable costs incurred. However, in order for a resident to be sure of full reimbursement, the resident should submit a moving cost estimate to the PHA for approval prior to the move unless the PHA is directly carrying out the move and the resident will not incur any reasonable out-of-pocket moving expenses. Failure to do so may result in the resident not being fully reimbursed.

- Utility Costs - The PHA is responsible for covering the expenses relating to disconnection and reconnection of necessary utilities. If the resident has telephone, cable service or Internet access, the PHA is responsible for covering the expenses involved in transferring existing service. The PHA may also pay utility deposits, if required at the temporary relocation housing (HUD Handbook 1378, paragraph 2-7(A)(3)). If a resident is temporarily relocating from a public housing unit to a non-public housing unit, the resident must be reimbursed for reasonable increases in utility costs even if the PHA utility allowance is lower than the actual costs to the resident.

V. Permanent Relocation Assistance

Based on the local housing resources available, the PHA should identify the replacement housing options that will be available to meet the housing needs of residents to be permanently relocated. Replacement housing options for residents that meet the definition of a "displaced person" (49 CFR 24.2(a)(9)) under the URA include, but are not limited to:

- Other Public Housing;
- Section 8 Project-Based Voucher unit;
- Section 8 Housing Choice Voucher unit;
- Homeownership housing;

- Private-market rental housing (affordable, non-subsidized).[16]

The plan should describe each type of replacement housing projected to be available, including:

1. Number of units, by bedroom size, expected to be available, and discussion of whether available units will meet dwelling requirements of relocated residents;
2. General area or location of unit(s);
3. Criteria for receiving relocation assistance; and
4. Any other information that might benefit residents in their consideration of housing choices.

The plan should include a description of the permanent relocation assistance the PHA will provide to residents. This assistance includes:

- Availability of Comparable Replacement Housing – Under URA, no displaced resident will be required to move unless at least one comparable replacement dwelling (49 CFR 24.2(a)(6)) is made available at least 90 days before the required move (49 CFR 24.203(c)). Comparable replacement dwellings must contain the accessibility features needed by displaced persons with disabilities (49 CFR 24.2(a)(8)(vii); 49 CFR part 24, Appendix A, §24.2(a)(8)(vii)). If the comparable replacement dwelling is not subsidized housing, the PHA should contact the RAD staff for advice on replacement housing payment requirements.

- Referral to Housing Not Located in an Area of Minority Concentration - Whenever possible, minority persons shall be given reasonable opportunities to relocate to decent, safe, and sanitary replacement dwellings that are within their financial means and not located in areas of minority concentration (49 CFR 24.205(c)(2)(ii)(D)). However, this policy does not require a PHA to provide a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling unit.

- Permanent Relocation Moving Expenses from Public Housing to Public Housing - The PHA may choose one of the following options for covering the expenses involved in moving public housing residents that are relocated into other public housing:

  - Undertake the move itself, using force account labor or a moving company. Residents should incur no moving costs under this option, but if such expenses are incurred, the PHA is responsible for reimbursing the resident for any such actual and reasonable expenses. In such case, the resident is also entitled to a dislocation allowance (currently $100). The URA Fixed Residential Moving Cost Schedule lists the current dislocation allowance and is available at: http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm

[16] Every effort should be made to find another subsidized unit as replacement housing for a resident relocating from subsidized housing so that the resident will continue receiving the housing subsidy as long as it is needed.

NOTE: Residents who prefer to pack their own personal possessions and items of value may be provided packing instructions, boxes, markers, and tape for their move. If a resident needs assistance in packing, they should contact the PHA. It is the responsibility of the PHA to pack and move all of their belongings and household goods, if so desired.

- Allow the resident to elect one of the following choices:

  1) The PHA will reimburse the resident for the cost of all actual reasonable and necessary moving and related expenses (49 CFR 24.301), such as:
     - Transportation of the resident and personal property. This may include reimbursement at the current mileage rate for personally owned vehicles that need to be moved. Transportation costs for a distance beyond 50 miles are not eligible, unless the PHA determines that relocation beyond 50 miles is justified.
     - Packing, crating, uncrating, and unpacking of personal property.
     - Storage of personal property for a period not to exceed 12 months, unless the PHA determines that a longer period is necessary.
     - Disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property.
     - Insurance for the replacement value of the property in connection with the move and necessary storage.
     - The replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.

  2) The PHA will pay directly to the resident the applicable and current fixed moving cost payment according to the URA Fixed Residential Moving Cost Schedule (49 CFR 24.302), available at: http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm

- Permanent Relocation Moving Expenses for All Other Moves – Under URA, residents who are permanently displaced, except for those residents displaced from public housing and moving to other public housing, are entitled to the assistance described in the brochure *Relocation Assistance To Residents Displaced From Their Homes,* available in English at http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_16280.doc and in Spanish at http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_16281.doc. Residents may choose moving assistance from one of the following two options.

  1) The PHA will reimburse the resident for the cost of all actual reasonable moving and related expenses (49 CFR 24.301).

  2) The PHA will pay directly to the resident the applicable and current fixed moving cost payment according to the URA Fixed Residential Moving Cost Schedule (49

CFR 24.302), available at: http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm.

- Replacement Housing Payment - In addition to covering moving expenses, displaced residents may be entitled to a replacement housing payment (RHP). This payment is intended to cover the increase, if any, in monthly housing costs for a 42-month period.

  When calculating the RHP, the PHA must consider the comparable replacement housing unit offered to the resident. Since the PHA is not required to pay an RHP amount that exceeds the amount of RHP calculated for the offered comparable replacement dwelling, residents are cautioned to work closely with the PHA prior to their move.

- Accessible Housing for Persons with Disabilities - Under the URA, persons with disabilities who will be permanently displaced must be relocated to a replacement dwelling that contains the accessibility features they need (49 CFR 24.2(a)(8)(vii); 49 CFR Appendix A, 24.2(a)(8)(vii)). A person with disabilities who has been relocated must be offered a comparable replacement dwelling unit that contains accessible features comparable to the housing from which the tenant has been displaced or relocated. This is so even if the tenant has paid for the acquisition and/or installation of accessible features in the housing from which he or she has been relocated; in such instances, the recipient must ensure that the replacement housing contains comparable accessible features or provide relocation assistance to the tenant in an amount that covers the cost of acquiring and/or installing comparable accessible features. Under the URA, an agency may use project funds to remove architectural barriers for displaced owners and tenants with disabilities or take other last resort housing measures if comparable replacement dwelling units are not available within the monetary limits prescribed under the URA regulations (49 CFR 24.404(c)(vii); HUD Handbook 1378, Paragraph 3-8).

VI. **Relocation Budget**

Based on the results of the planning process, the PHA should create a relocation budget that includes the following six components:

1) The cost of administering the plan and providing assistance and counseling.

2) Reasonable moving expenses for a person with disabilities, which may include the cost of moving assistive equipment that is the personal property of the residents, the furnishings and personal belonging of a live-in aide, and/or other reasonable accommodations (HUD Handbook 1378, Paragraph 3-2).

3) The cost of the physical move of the residents' belongings. (It is suggested that the move costs be broken down by average cost per move type multiplied by the number of moves.)
   NOTE: This physical move cost total should be based on the move scenarios anticipated

or projected by the resident survey.

4) The cost estimated to pay for projected increases in monthly housing costs for temporary relocation.

5) The cost estimated to pay for the replacement housing payment (RHP) (42-month period for URA or 60-month period if section 104(d) applies).

6) Contingency costs estimated for carrying out the relocation process necessary to complete the proposed project. (The PHA should state where these costs are indicated in the application, or attach any other information required by HUD, to support these costs.)

VII. Appeal Process

If a resident disagrees with the PHA's decision as to the resident's eligibility to receive relocation assistance, the amount of a relocation payment, or the adequacy of a comparable replacement dwelling offered to a resident, the resident may file a written appeal to the PHA. The Relocation Plan should describe the specific appeal procedures to be followed consistent with 49 CFR 24.10 (and 24 CFR 42.390 if section 104(d) is involved). At a minimum, the resident will have 60 days to file an appeal with the PHA after receiving written notification of a claim or ineligibility determination.

VIII. Certification

The plan should contain a certification of compliance with the URA and, if applicable, section 104(d).

Technical Assistance

The PHA should direct questions on this Notice's relocation assistance requirements to their RAD Transaction Manager or email rad@hud.gov.

Appendix 2: SAMPLE RAD GENERAL INFORMATION NOTICE (GIN)

PHA LETTERHEAD

RENTAL ASSISTANCE DEMONSTRATION (RAD)
GENERAL INFORMATION NOTICE (GIN)

[Date]

Dear [Resident Name],

The property you currently occupy is being proposed for participation in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. At this time, we expect that [the proposed acquisition, rehabilitation or demolition, may require you to be relocated (temporarily or permanently) from your unit]. We will provide further details to you as plans develop. **This notice does not mean that you need to leave the property at this time. This is not a notice of eligibility for relocation assistance.** The remainder of this letter only applies to situations where you will need to be relocated from your unit.

This notice serves to inform you of your potential rights under the RAD program and a federal law known as the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). If the proposed RAD project receives HUD approval and if you are displaced permanently as a result, you may become eligible for relocation assistance and payments under the URA, including:

1) Relocation advisory services that include referrals to replacement properties, help in filing payment claims and other necessary assistance to help you successfully relocate;
2) At least 90 days' advance written notice of the date you will be required to move;
3) Payment for moving expenses; and
4) Payments to enable you to rent a similar replacement home.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an immigrant lawfully present in the United States.

As a resident of a property participating in RAD, you have the right to return to the project after the project is complete. You will be able to lease and occupy a unit in the converted project when rehabilitation is complete.

If you are permanently displaced from your home, you will not be required to move until you are given at least 90-day advance written notice of any required move and at least one comparable replacement dwelling has been made available to you. If you are temporarily relocated and your temporary relocation lasts more than one year, you will be contacted and offered permanent relocation assistance as a displaced person under the URA. This assistance would be in addition

to any assistance you may receive in connection with temporary relocation and will not be reduced by the amount of any temporary relocation assistance you have already received.

If you are required to relocate from the property in the future, you will be informed in writing. [PHA] will inform you of what assistance and payments you are eligible for if you will be relocated because of RAD and how you will receive these payments. If you become a displaced person, you will be provided reasonable assistance necessary to complete and file any required claim to receive a relocation payment. If you feel that your eligibility for assistance is not properly considered, you will also have the right to appeal a determination on your eligibility for relocation assistance.

You should continue to pay your rent and meet any other requirements specified in your lease. If you fail to do so, [PHA] may have cause for your eviction. If you choose to move, or if you are evicted, prior to receiving a formal notice of relocation eligibility, you may become ineligible to receive relocation assistance. It is very important for you to contact us before making any moving plans.

You will be contacted soon so that we can provide you with more information about the proposed project. If the project is approved, we will make every effort to accommodate your needs. In the meantime, if you have any questions about our plans, please contact: [Name, Title, Address, Phone, Email Address]. This letter is important to you and should be retained.

Sincerely,

[Name]
[Title]

NOTES:

1. Files must indicate how this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378)
2. This is a sample GIN. PHAs should revise it to reflect project-specific circumstances.
3. PHAs may provide residents with HUD brochure "Relocation Assistance To Residents Displaced From Their Homes" available at: http://www.hud.gov/offices/cpd/library/relocation/publications/1042.pdf.

Appendix 3: SAMPLE RAD NOTICE OF RELOCATION (For relocation anticipated for a year or less)

THIS IS A GUIDE FORM.
REVISE TO REFLECT THE PROJECT-SPECIFIC CIRCUMSTANCES.

PHA Letterhead

(date)

Dear [*Resident Name*],

The property you currently occupy is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. On [*date*], the [*Public Housing Authority*] (PHA) notified you of proposed plans to [acquire/ rehabilitate/demolish] the property you currently occupy at [*address*]. On [*date*], HUD issued the RAD Conversion Commitment (RCC) and committed federal financial assistance to the project. [*In instances where a Notice of Intent to Acquire is applicable and this notice is being sent before the RCC is issued, in lieu of the previous sentence noting the RCC issuance date, insert:* [*Name of entity acquiring the property*] (Displacing Agency) intends to acquire the property you currently occupy. **This is a Notice of Intent to Acquire.**]

In order for PHA to complete the project, you will need to be relocated for [*anticipated duration of relocation*]. Upon completion of the project, you will be able to lease and occupy your present unit or another decent, safe and sanitary unit in the completed project under reasonable terms and conditions. You are eligible for relocation payments and assistance.

However, **<u>you do not need to move now</u>.** This notice informs you that a decent, safe, and sanitary dwelling unit, listed below, has been made available to you and you will be required to move by [*insert date at least 30 days after the date of this notice*].

If your temporary relocation exceeds one year and you qualify as a "displaced person" under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), you may be eligible for further relocation assistance and payments under URA.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

The relocation assistance to which you are entitled includes:

- <u>Payment for Moving Expenses</u>. You are entitled to be reimbursed for all reasonable out-of-pocket expenses incurred in connection with any temporary

move. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 4 of this Notice.*]

- The location of your temporary replacement unit is [*address*]. This temporary housing has been determined to be decent, safe and sanitary.

- [*List appropriate relocation advisory services and any other services and assistance provided.*]

If you disagree with this determination, you may file a written appeal to the PHA in accordance with 49 CFR 24.10.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [*Name, Title, Address, Phone, Email Address*] before you make any moving plans. He/she will assist you with your move to a temporary unit and help ensure that you preserve your eligibility for any relocation payments to which you may be entitled.

Remember, do not move or commit to the purchase or lease of a replacement home before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

_____
Print name:
Title:

NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)

Appendix 4: SAMPLE RAD NOTICE OF RELOCATION (For relocation anticipated for more than a year)

THIS IS A GUIDE FORM.
REVISE TO REFLECT THE PROJECT-SPECIFIC CIRCUMSTANCES.

PHA Letterhead

(date)

Dear [*Resident Name*],

The property you currently occupy is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. On [*date*], the [*Public Housing Authority*] (PHA), notified you of proposed plans to [acquire/ rehabilitate/demolish] the property you currently occupy at [*address*]. On [*date*], HUD issued the RAD Conversion Commitment (RCC) and committed federal financial assistance to the project. [*In instances where a Notice of Intent to Acquire is applicable and this notice is being sent before the RCC is issued, in lieu of the previous sentence noting the RCC issuance date, insert:* [*Name of entity acquiring the property*] (Displacing Agency) intends to acquire the property you currently occupy. **This is a Notice of Intent to Acquire.**]

In order for PHA to complete the project, you will need to be relocated for [*anticipated duration of relocation*]. Upon completion of the project, you will be able to lease and occupy your present unit or another decent, safe and sanitary unit in the completed project under reasonable terms and conditions. You are eligible for relocation assistance and payments. Because we expect your relocation to exceed one year, you have the choice to either:

- Receive temporary relocation assistance and return to a unit in the RAD project once it is complete; or
- Receive permanent relocation assistance and payments consistent with the URA instead of returning to the completed RAD project.

You must inform us of your choice within 30 days.

However, **<u>you do not need to move now</u>.** If you choose temporary relocation assistance, you will not be required to move sooner than 30 days after you receive notice that a temporary unit is available for you. If you choose permanent relocation assistance, you will not be required to move sooner than 90 days after you receive written notice that at least one comparable replacement unit is available to you in accordance with 49 CFR 24.204(a). [*Note to PHA: These time periods may start running as of the date of this Notice if the notice of relocation includes such information on the temporary and/or comparable replacement dwelling options, as applicable. In such circumstance, add applicable sentences to adequately notify the resident. For example:* This notice informs you that a temporary unit, listed below, has been made available to you and, if you choose this option, you will be required to move by [*date no sooner than 30 days after notice*]. This notice informs you

that a comparable unit, listed below, has been made available to you and, if you choose this option, you will be required to move by [*date no sooner than 90 days after notice*].]

If you choose temporary relocation, your relocation exceeds one year and you qualify as a "displaced person" under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), you may become eligible for further relocation assistance and payments under URA.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

If you choose to receive temporary relocation assistance, this assistance will include:

- Payment for Moving Expenses. You are entitled to be reimbursed for all reasonable out-of-pocket expenses incurred in connection with any temporary move. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 4 of this Notice.*]

- The location of your temporary replacement unit is [*address*]. This temporary housing has been determined to be decent, safe and sanitary.

- [*List appropriate relocation advisory services and any other services and assistance provided.*]

If you elect to receive permanent relocation assistance, this assistance will include:

- Relocation Advisory Services. You are entitled to receive current and continuing information on available comparable replacement units and other assistance to help you find another home and prepare to move.

- Payment for Moving Expenses. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 5 of this Notice.*]

- Replacement Housing Payment. You may be eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including: (1) the monthly rent and cost of utility services for a comparable replacement unit, (2) the monthly rent and cost of utility services for your present unit, and (3) 30% of your average monthly gross household income. This payment is calculated on the difference between the old and new housing costs for a one-month period and multiplied by 42.

- [*PHA: list here any permanent relocation assistance offered, such as a Housing Choice Voucher.*]

- Listed below are three comparable replacement units that you may wish to consider for your replacement home. If you would like, we can arrange transportation for you to inspect these and other replacement units.

	Address	Rent & Utility Costs	Contact Info
1.			
2.			
3.			

We believe that the unit located at [*address*] is most representative of your original unit in the converting RAD project. The monthly rent and the estimated average monthly cost of utilities for this unit is [$ *amount*] and it will be used to calculate your maximum replacement housing payment. Please contact us immediately if you believe this unit is not comparable to your original unit. We can explain our basis for selecting this unit as most representative of your original unit and discuss your concerns.

Based on the information you have provided about your income and the rent and utilities you now pay, you may be eligible for a maximum replacement housing payment of approximately [$ (42 x monthly amount)], if you rent the unit identified above as the most comparable to your current home or rent another unit of equal cost.

Replacement housing payments are not adjusted to reflect future rent increases or changes in income. This is the maximum amount that you would be eligible to receive. If you rent a decent, safe and sanitary home where the monthly rent and average estimated utility costs are less than the comparable unit, your replacement housing payment will be based on the actual cost of that unit. All replacement housing payments must be paid in installments. Your payment will be paid in [#]__ installments.

You may choose to purchase (rather than rent) a decent, safe and sanitary replacement home. If you do, you would be eligible for a down-payment assistance payment which is equal to your maximum replacement housing payment, [$*amount*.] [*PHAs should note that, at the agency's discretion, a down-payment assistance payment that is less than $5,250 may be increased to any amount not to exceed $5,250. (See 49 CFR 24.402(c)(1)).*] Let us know if you are interested in purchasing a replacement home and we will help you locate such housing.

Please note that all replacement housing must be inspected in order to ensure it is decent, safe and sanitary before any replacement housing payments are made.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [*Name, Title, Address, Phone, Email Address*] before you make any moving plans. He/she will assist you with your move to a new home and help ensure that you preserve your eligibility for all relocation payments to which you may be entitled.

Remember, do not move or commit to the purchase or lease of a replacement home before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

_____

Print name:
Title:

Enclosure/s

NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)

Appendix 5: SAMPLE NOTICE OF ELIGIBILITY FOR URA RELOCATION ASSISTANCE (For residents who have been temporarily relocated for more than a year)

THIS IS A GUIDE FORM.
IT SHOULD BE REVISED TO REFLECT THE CIRCUMSTANCES.

PHA Letterhead

(date)

Dear [*Resident*]:

The property you formerly occupied at [*address*] is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program.
You have been temporarily relocated from that property since [*date*.] Your temporary relocation has exceeded one year.

It has been determined that you qualify as a "displaced person" according to the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). You are eligible for relocation assistance and payments under the URA.

You may choose to remain temporarily relocated and return to a unit in the RAD project once it is completed. It is currently estimated that you may return to the RAD project by [*date*]. If you choose to remain temporarily relocated, you will stay at your current location until the RAD project is completed.

Alternatively, you may choose permanent relocation assistance and payments for which you are eligible, as listed below. If you choose permanent relocation assistance, you give up your right to return to the completed RAD project. However, **<u>you do not need to move now</u>.** If you choose permanent relocation assistance instead of exercising your right to return to the completed RAD project, you will not be required to move sooner than 90 days from the date that at least one comparable replacement unit has been made available to you. [*Alternatively:* You will not be required to move sooner than 90 days from the date of this notice, which informs you of a comparable replacement unit that has been made available for you].

This is your Notice of Eligibility for relocation assistance.

The effective date of your eligibility is [*insert date that relocation exceeds one year*.]

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

Enclosed is a brochure entitled, "Relocation Assistance to Tenants Displaced From Their Homes." Please read the brochure carefully. It explains your rights and provides additional information on eligibility for relocation payments and what you must do in order to receive these payments.

The relocation assistance to which you are entitled includes:

- Relocation Advisory Services. You are entitled to receive current and continuing information on available comparable replacement units and other assistance to help you find another home and prepare to move.

- Payment for Moving Expenses. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 5 of this Notice.*] This is in addition to any amounts received to reimburse for any reasonable out-of-pocket expenses incurred in connection with the temporary move.

- Replacement Housing Payment. You may be eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including: (1) the monthly rent and cost of utility services for a comparable replacement unit, (2) the monthly rent and cost of utility services for your present home, and (3) for low-income persons, 30 percent of your average monthly gross household income. This payment is calculated on the difference between the old and new housing costs for a one-month period and multiplied by 42.

- [*PHA list here any other relocation assistance offered the resident, such as Housing Choice Voucher* .]

Listed below are three comparable replacement units that you may wish to consider for your replacement home. If you would like, we can arrange transportation for you to inspect these and other replacement units.

	Address	Rent & Utility Costs	Contact Info
1.			
2.			
3.			

We believe that the unit located at [*address*] is most representative of the original unit you occupied in the converting RAD project. The monthly rent and the estimated average monthly cost of utilities for this unit is $[*amount*] and it will be used to calculate your maximum replacement housing payment. Please contact us immediately if you believe this unit is not comparable to your original unit. We can explain our basis for selecting this unit as most representative of your original unit and discuss your concerns.

Based on the information you have provided about your income and the rent and utilities you now pay, you may be eligible for a maximum replacement housing payment of approximately $ [42 x $Amount], if you rent the unit identified above as the most comparable to your current home or rent another unit of equal cost.

Replacement housing payments are not adjusted to reflect future rent increases or changes in income. This is the maximum amount that you would be eligible to receive. If you rent a decent, safe and sanitary home where the monthly rent and average estimated utility costs are less than the comparable unit, your replacement housing payment will be based on the actual cost of that unit. All replacement housing payments must be paid in installments. Your payment will be paid in [#] installments.

Should you choose to purchase (rather than rent) a decent, safe and sanitary replacement home, you would be eligible for a downpayment assistance payment which is equal to your maximum replacement housing payment, [$ *amount*] [*PHAs should note that, at the agency's discretion, a downpayment assistance payment that is less than $5,250 may be increased to any amount not to exceed $5,250. (See 49 CFR 24.402(c)(1)).*] Let us know if you are interested in purchasing a replacement home and we will help you locate such housing.

Please note that all replacement housing must be inspected in order to ensure it is decent, safe, and sanitary before any replacement housing payments are made.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [Name, Title, Address, Phone, Email Address] before you make any moving plans. He/she will assist you with your move to a new home and help ensure that you preserve your eligibility for any applicable relocation payments.

Remember, do not move or commit to the purchase or lease of a replacement home before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

_____

Print Name:
Title:

Enclosure/s

NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)

RESOLUTION NO. 11821

RESOLUTION AUTHORIZING AN AMENDMENT TO THE PHILADELPHIA HOUSING AUTHORITY MOVING TO WORK ("MTW") ANNUAL PLAN FOR MTW YEAR SIXTEEN

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") administers a Moving to Work ("MTW") Demonstration Program and the Rental Assistance Demonstration Program ("RAD"); and

WHEREAS, HUD regulations for the RAD program require that approval for the conversion of units to RAD be brought before the Board of Commissioners as an amendment to the Annual MTW Plan; and

WHEREAS, PHA has identified two hundred three (203) PHA-owned long-term vacant scattered sites from which to transfer operating and capital assistance to four (4) non-profit development partners, which partners will use that funding to develop two hundred three (203) units of affordable rental housing and then receive operating assistance under the RAD Section 8 Unit Based Voucher Program; and

WHEREAS, PHA, in conjunction with Michaels Development Corporation, seeks to convert the Southwark Plaza, one of PHA's alternative management sites, and its 470 units to RAD; and

WHEREAS, PHA has provided resident leaders with the locations of the two hundred three (203) PHA-owned long-term vacant scattered sites and discussed with resident leadership the transfer of assistance to the four (4) non-profit development partners and the conversion of Southwark Plaza; and

WHEREAS, PHA has fulfilled the HUD requirement of providing opportunities for resident and public participation and comment on the Amended Annual Plan, including scheduling at least one (1) public hearing, by: 1) providing copies of the Amendment to the Plan on October 9, 2015; 2) holding an introductory meeting with Resident Leaders representing RAD Sites on October 14, 2015 3); holding a meeting with resident leadership on October 27, 2015; 3) holding a public hearing on October 29, 2015; 4) posting the draft plan on PHA's website; and 5) making copies of the draft plan available at PHA site offices; and also has taken into consideration any comments received;

BE IT RESOLVED that the Board of Commissioners does hereby approve the Amendment to the MTW Year Sixteen Annual Plan, as distributed to the Board of Commissioners and referenced herein, and authorizes PHA's Chair and/or its President & CEO or his or her authorized designee(s) to take all steps necessary to finalize and secure HUD approval of, and to implement, the amendment.

I hereby certify that this was
APPROVED BY THE BOARD ON 11/19/15
Barbara Williams, General Counsel
ATTORNEY FOR PHA

NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD
PHILADELPHIA HOUSING AUTHORITY

The Philadelphia Housing Authority (PHA) is a participant in the Moving to Work Demonstration Program (MTW) pursuant to an Amended and Restated Moving to Work Agreement (MTW Agreement) with the U.S. Department of Housing and Urban Development (HUD). The MTW Agreement defines the terms and conditions under which PHA is a participant in the MTW Program and requires PHA to submit an MTW Annual Plan for HUD review and approval. PHA's MTW Annual Plan for Fiscal Year 2016 was originally submitted to HUD in January 2015, and approved by HUD in September 2015.

PHA is seeking public review and comments on a proposed amendment to the FY 2016 MTW Annual Plan concerning PHA's plans to convert certain public housing units to project-based assistance under the Rental Assistance Demonstration (RAD) program. The units consist of 203 vacant and uninhabitable scattered site public housing units as well as 470 public housing units managed by an Alternate Management Entity at Southwark Plaza Apartments (also known as Courtyard Apartments at Riverview). The proposed amendment provides information required by HUD concerning PHA's RAD conversion plans. The proposed amendment is incorporated in its entirety into the FY2016 MTW Annual Plan through an attachment entitled "Rental Assistance Demonstration Significant Amendment". It is available for public review and downloading on PHA's website at www.pha.phila.gov under the "Latest News" section or may be picked up at the following locations:

Housing Choice Voucher Program Office:

2850 Germantown Ave 1st & 2nd Floor

Scattered Sites Management Offices:

Abbottsford Homes - 3226 McMichael Street
Westpark Apartments - 4445 Holden Street
Spring Garden Apartments - 715 Brandywine Street
Wilson Park - 2500 Jackson Street
Fairhill Apartments - 2411 N. 11th Street

Public Housing Management Offices:

Bartram - 5404 Gibson Drive
Raymond Rosen – 2110 N. 23rd Street
Wilson Park - 2500 Jackson Street

PHA will conduct a Public Hearing on the proposed amendment. PHA residents, Housing Choice Voucher participants and the general public are invited to attend and provide comments at the Hearing and/or to submit written comments during the public comment period. The Public Hearing is scheduled for the following time and location:

Thursday, October 29, 2015 at 4:00 P.M.
12 South 23rd Street, 6th Floor
Philadelphia, PA 19103

The public comment period begins on October 6, 2015 at 12 noon and ends November 5, 2015 at 12 noon. All comments must be received at PHA's office by the end of the comment period. Please send written comments to:

Philadelphia Housing Authority
Office of Policy, Research and Enterprise Planning
Attention: MTW Plan Amendment Comment
12 South 23rd Street, Philadelphia, PA 19103

The Public Hearing is being held in an accessible location. If you require assistance, sign language interpreter or other accommodations, please call 215-684-5767. Please use the AT&T Relay Service for TTY.

PHA
PHILADELPHIA HOUSING AUTHORITY
OPENING DOORS TO OPPORTUNITIES

Certification of Consistency with the Consolidated Plan

U.S. Department of Housing and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan. (Type or clearly print the following information:)

Applicant Name: Philadelphia Housing Authority

Project Name: Moving to Work Annual Plan FY 2016 RAD Significant Amendment

Location of the Project: The development and implementation of affordable housing and economic development initiatives in Phila., in accord with the City's ConPlan and AI. (2016 Consolidated Plan, adopted June, 2015)

Name of the Federal Program to which the applicant is applying: HUD - Moving to Work Demonstration

Name of Certifying Jurisdiction: City of Philadelphia, Office of Housing & Community Development

Certifying Official of the Jurisdiction Name: Melissa Long

Title: Deputy Director

Signature:

Date: 01/21/2016

Civil Rights Certification

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing.

Philadelphia Housing Authority	PA002
PHA Name	PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Lynette Brown-Sow	Title	Chair, Board of Commissioners
Signature	Lynette M. Brown-Sow	Date	01/15/2016

APPENDIX H
RENTAL ASSISTANCE DEMONSTRATION (RAD) SIGNIFICANT AMENDMENT

Appendix H includes:

- RAD Significant Amendment #2 to FY 2016 MTW Plan
- Board Resolution Approving RAD Significant Amendment
- Public Comment Period and Hearing Notice
- Certification of Consistency with the Consolidated Plan
- Civil Rights Certification

Philadelphia Housing Authority
Fiscal Year 2016 Moving to Work Annual Plan
Rental Assistance Demonstration Significant Amendment #2

The Philadelphia Housing Authority (PHA) is issuing a second amendment to its Fiscal Year 2016 Moving to Work (MTW) Annual Plan as required by the US Department of Housing and Urban Development (HUD) to provide information on PHA's planned activities under the Rental Assistance Demonstration (RAD) program. Pursuant to this second amendment, PHA will convert certain vacant and uninhabitable, scattered site public housing units to project-based assistance under RAD, and transfer the project-based assistance to other new or existing developments as identified herein. This Significant Amendment #2 covers the RAD conversion and transfer of assistance of 276 units.

Background

In December 2013, the PHA Board of Commissioners authorized the submission of several applications to HUD under the RAD program. The Board's approval came after a series of public meetings were held to inform existing residents about the RAD program and their rights under a proposed RAD conversion.

In March 2015, HUD issued RAD award letters to PHA that approved the applications for RAD conversion, subject to PHA meeting all of the conditions and requirements of the RAD program. The award letters serve as HUD's Commitment to Enter into a Housing Assistance Payments Contract (CHAP) for the subject public housing developments. Accordingly, PHA intends to proceed with RAD conversion and transfer of assistance under the guidelines of PIH Notice 2012-32, REV-2 dated June 15, 2015 ("HUD RAD Notice") and any other successor Notices issued by HUD.

One of the conditions of the CHAP is that PHA submit a Significant Amendment to the MTW Annual Plan that incorporates required information on PHA's RAD conversion plans. This document provides the required information and serves as PHA's RAD Significant Amendment to the approved FY 2016 MTW Annual Plan for the subject units. Note also that PHA obtained PHA Board approval in November 2015 for a Significant Amendment #1 to the FY 2016 Plan, which is currently pending HUD approval. PHA intends to propose further Significant Amendment(s) for additional HUD-approved RAD conversions at future dates. PHA is providing a thirty-day public comment period and will conduct a Public Hearing to allow residents and the general public an opportunity to review and comment on the RAD Significant Amendment. Following this period, the PHA Board of Commissioners will conduct a vote on the RAD Significant Amendment at a public meeting.

RAD Conversion Plan

This Significant Amendment provides information on PHA's plans to convert public housing units to project-based assistance under RAD as follows:

A total of 276 scattered site public housing units owned by PHA that are currently vacant

and uninhabitable. The public housing assistance for these scattered site units will be converted to Project Based Voucher (PBV) assistance and transferred to six (6) developments owned either by PHA, a PHA subsidiary or a third party under the transfer of assistance provisions of the HUD RAD Notice.

Attachment 1 includes current information on each development or Asset Management Project (AMP) proposed for RAD conversion. Attachment 1 includes the following information:

Current Units:	Total number of units, bedroom size distribution and unit type.
Post-Conversion Units:	If applicable, any changes proposed to the current number of units, the bedroom size distribution or the unit type including de minimis reductions. No unit reductions are proposed under this Significant Amendment.
Transfer of Assistance:	Whether PHA intends to transfer assistance to another development as part of the RAD conversion and, if so, the location, number of units, bedroom size distribution, and unit type where known. As noted, all of the developments covered by this Significant Amendment involve transfer of assistance under RAD.
PBV or PBRA:	Whether PHA intends to convert the development to the Project Based Voucher (PBV) program or to the Project Based Rental Assistance (PBRA) program, along with information on resident rights, resident participation, waiting list and grievance procedures applicable to each program. PHA intends to convert assistance to the PBV program.
Capital Fund Impact:	The current amount of Capital Fund dollars received prior to RAD conversion. Developments converted through the RAD program are not eligible for Public Housing Capital Funds after conversion.
Transfer of Waiting List:	How existing waiting lists will be addressed as part of the conversion.

Conversion to Project Based Vouchers or Project Based Rental Assistance

Public housing developments that are converted to project-based assistance will no longer be subject to HUD rules and regulations pertaining to the public housing program. Upon conversion to RAD, the former public housing units will be subject to the rules and regulations pertaining to either the PBV or PBRA programs, depending on which program option is selected by PHA. HUD has modified the PBV and PBRA program rules and regulations to incorporate additional provisions that apply solely to units converted under RAD. These additional provisions provide important protections to current residents of public housing that are impacted by a RAD conversion.

PHA intends to convert the RAD units listed in Attachment 1 to the PBV program. As part of the conversion initiative, PHA will adopt all required RAD PBV rules except where MTW or

other waivers are approved by HUD, and will modify its existing Housing Choice Voucher Program Administrative Plan as needed to incorporate those rules related to resident rights, resident participation, waiting list, lease, waiting list, grievance processes and other areas.

Attachment 2 provides information on the RAD PBV program as required by the HUD RAD Notice and the HUD Joint Housing PIH Notice H-2014-9/PIH-2014-7 related to resident rights and participation, waiting list and grievance procedures.

Capital Fund Budget

Conversion of existing public housing developments under the RAD program will enable PHA to leverage existing funds to secure additional private and other funding. This new funding will be used to undertake long-deferred capital improvements and, in instances where transfer of assistance is involved, to construct or rehabilitate new or existing affordable housing units.

PHA currently receives HUD Capital Funds on an annual basis, subject to Congressional appropriations for the majority of its public housing units. Attachment 1 includes the FY 2015 Capital Fund allocation for each RAD conversion site. Upon conversion to RAD, PHA will no longer receive a Capital Fund allocation for units that have been converted and the annual Capital Fund grant will be decreased.

The total estimated reduction in PHA Capital Funds on an annual basis for the subject units covered under this Significant Amendment is $816,163 based on FY2015 funding levels. Over a five year period, the estimated Capital Fund reduction is $4,080,815 based on FY2015 funding levels. The actual amount of reduction may vary depending on Congressional appropriations. As RAD conversions are completed, PHA will modify its existing capital plans to reflect the reduction in funding and change in work scopes.

The RAD conversion will not impact PHA's existing Capital Fund Financing Program (CFFP) obligations. PHA currently projects that it will utilize an estimated $3.46 million in Replacement Housing Funds (RHF) and $12.61 million in MTW Block Grant or other available funds to support the RAD transfer of assistance to the 55-unit Strawberry Mansion development described in Attachment 1. Actual figures may vary based on the final financing plan.

Site and Neighborhood Standards

PHA has analyzed the replacement sites for the RAD conversions covered under this Significant Amendment that involve transfer of assistance. All proposed sites comply with the HUD Site and Neighborhood Standards as defined in 24 CFR 983 and the current MTW Site and Neighborhood Standards as defined in PHA's MTW Agreement.

Relocation Plan

Any necessary resident relocation related to RAD conversions will be performed in accordance with the HUD RAD Notice, HUD Joint Housing Notice H-2014-09/PIH-2014-17 and any other successor Notices issued by HUD; however, no resident relocation is anticipated under this Significant Amendment.

Compliance

PHA is not presently subject to a voluntary compliance agreement, consent order, consent decree, final judicial ruling or administrative ruling that has any relation to or impact on the planned RAD conversion.

Moving To Work

PHA may utilize MTW Block Grant fungibility and programmatic flexibility to support the RAD conversion effort subject to any necessary Board and HUD approvals. PHA certifies that regardless of any funding changes that may occur as a result of conversion under RAD, PHA will continue to administer and maintain service levels for its remaining portfolio of public housing units. PHA will do this by utilizing available funding including Public Housing Operating Fund, Capital Fund, and Tenant Rental Income.

Significant Amendment Definition

As part of the RAD conversion initiative, a Significant Amendment to the MTW Plan will not be required for the following RAD-specific actions:

- Changes to the Capital Fund budget produced as a result of each approved RAD conversion regardless of whether the proposed conversion will include use of additional Capital Funds;

- Decisions to apply MTW funding or programmatic flexibility to post-conversion RAD developments;

- Decisions or changes related to the ownership and/or financing structures for each approved RAD conversion including decisions to allocate PHA financial resources as a source of funds to support the RAD conversion initiatives;

- Changes to the construction and rehabilitation plans and scheduled for each approved RAD conversion;

- Changes to the project names or sponsor entity names;

- Changes in the post-conversion bedroom size distribution and/or the number of de minimis unit reductions up to the 5% permitted under RAD program rules;

- Changes to the pre-conversion bedroom size distribution and/or the project or AMP from which transfer of assistance units will be converted; and,

- Decisions to convert to either Project Based Vouchers or Project Based Rental Assistance.

Philadelphia Housing Authority
Fiscal Year 2016 Moving to Work Annual Plan Amendment
Rental Assistance Demonstration Significant Amendment #2
Attachment 1 – Information on Public Housing Developments to be Converted

The following pages provide required information on each development and/or Asset Management Project (AMP) to be converted from public housing assistance to Project Based Voucher (PBV) assistance under the Rental Assistance Demonstration (RAD) program.

RAD Significant Amendment Attachment 1

Development Name	Ludlow Scattered Sites
PIC Development ID #	PA002000907
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY15)	136,257
Pre-Conversion Total Units	49
Pre-Conversion Unit Type	Family
Pre-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	0
2 BR	2
3 BR	11
4 BR	10
5 BR	20
6 BR	6

Post-Conversion Total Units	49 (Note that the post conversion site is an existing 75 unit housing development; however, only 49 transfer of assistance units will be covered under RAD)
Post-Conversion Unit Type	Family
Post-Conversion Development Name/Address	Lehigh Park I, 2600-2620 N. Lawrence Street, Philadelphia, and Lehigh Park II, 2622-2644 N. Lawrence Street, Philadelphia
Post-Conversion Sponsor	Hispanic Association of Contractors and Enterprises (HACE)
Post-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	0
2 BR	41
3 BR	9
4 BR	0
5 BR	0
6 BR	0

Transfer of Assistance	Yes
De Minimis Reduction	N/A
Transfer of Waiting List	This is an existing, occupied development that will be rehabilitated. Existing residents who meet the PBV eligibility requirements will be assisted under the PBV Program. A new site-based waiting list will be established for the development. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Development Name	Kingsessing Scattered Sites
PIC Development ID #	PA002000903
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY15)	87,850

Pre-Conversion Total Units	29
Pre-Conversion Unit Type	Family
Pre-Conversion Bedroom Size	
	# of Units
0 BR	0
1 BR	0
2 BR	0
3 BR	15
4 BR	8
5 BR	5
6 BR	1

Post-Conversion Total Units	29
Post-Conversion Unit Type	Family
Post-Conversion Development Name/Address	Norris Square Scattered Sites, various addresses in the Norris Square neighborhood of Philadelphia
Post-Conversion Sponsor	Norris Square Community Alliance
Post-Conversion Bedroom Size	**# of Units**
0 BR	0
1 BR	8
2 BR	13
3 BR	7
4 BR	0
5 BR	1
6 BR	0

Transfer of Assistance	Yes
De Minimis Reduction	N/A
Transfer of Waiting List	This is an existing, partially occupied development that will be rehabilitated. Existing residents who meet the PBV eligibility requirements will be assisted under the PBV Program. A new site-based waiting list will be established for the development. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Development Name	Fairhill Square Scattered Sites, Francisville Scattered Sites, Susquehanna Scattered Sites, Strawberry Mansion Scattered Sites, Oxford Jefferson Scattered Sites
PIC Development ID #	PA002000905, PA002000906, PA002000908,PA002000909, PA002000910
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY15)	144,352
Pre-Conversion Total Units	48
Pre-Conversion Unit Type	Family
Pre-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	4
2 BR	20
3 BR	7
4 BR	1
5 BR	7
6 BR	9

Post-Conversion Total Units	48
Post-Conversion Unit Type	Family
Post-Conversion Development Name/Address	Haddington III Preservation Initiative, various addresses in the Haddington neighborhood of West Philadelphia
Post-Conversion Sponsor	Mission First Housing Group
Post-Conversion Bedroom Size	**# of Units**
0 BR	0
1 BR	0
2 BR	10
3 BR	30
4 BR	8
5 BR	0
6 BR	0

Transfer of Assistance	Yes
De Minimis Reduction	N/A
Transfer of Waiting List	This is an existing, occupied development that will be rehabilitated. Existing residents who meet the PBV eligibility requirements will be assisted under the PBV Program. A new site-based waiting list will be established for the development. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. Subject to PHA review and approval, preferences for this site will be included for family self-sufficiency, victims of domestic violence, and veterans. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Development Name	Haddington Scattered Sites, Mantua Scattered Sites, Fairhill Square Scattered Sites, Francisville Scattered Sites, Susquehanna Scattered Sites, Strawberry Mansion Scattered Sites, Oxford Jefferson Scattered Sites
PIC Development ID #	PA002000901, PA002000902, PA002000905,PA002000906, PA002000908, PA002000909, PA002000910
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY15)	156,269
Pre-Conversion Total Units	52
Pre-Conversion Unit Type	Seniors
Pre-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	0
2 BR	1
3 BR	4
4 BR	12
5 BR	30
6 BR	5

Post-Conversion Total Units	52
Post-Conversion Unit Type	Seniors
Post-Conversion Development Name/Address	St. John Neumann Place II, 2627 Mifflin Street, Philadelphia
Post-Conversion Sponsor	Office for Community Development of the Archdiocese of Philadelphia

	# of Units
0 BR	0
1 BR	52
2 BR	0
3 BR	0
4 BR	0
5 BR	0
6 BR	0

Transfer of Assistance	Yes
De Minimis Reduction	N/A
Transfer of Waiting List	This is a new construction project. A new site-based waiting list will be established for the development prior to the initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Development Name	Strawberry Mansion Scattered Sites
PIC Development ID #	PA002000909
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY15)	126,198

Pre-Conversion Total Units	42
Pre-Conversion Unit Type	Seniors
Pre-Conversion Bedroom Size	

	# of Units
0 BR	0
1 BR	0
2 BR	4
3 BR	6
4 BR	18
5 BR	14
6 BR	0

Post-Conversion Total Units	42
Post-Conversion Unit Type	Seniors
Post-Conversion Development Name/Address	NewCourtland at St. Bartholomews, Harbison Avenue and Cheltenham Avenue in Northeast Philadelphia
Post-Conversion Sponsor	NewCourtland Senior Services

	# of Units
0 BR	0
1 BR	42
2 BR	0
3 BR	0
4 BR	0
5 BR	0
6 BR	0

Transfer of Assistance	Yes
De Minimis Reduction	N/A
Transfer of Waiting List	This is a substantial rehabilitation development in a former school building. A new site-based waiting list will be established for the development prior to initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Development Name	Oxford Jefferson Scattered Sites
PIC Development ID #	PA0020000910
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY15)	165,237

Pre-Conversion Total Units	55
Pre-Conversion Unit Type	Family
Pre-Conversion Bedroom Size	
	# of Units
0 BR	0
1 BR	0
2 BR	2
3 BR	43
4 BR	8
5 BR	2
6 BR	0

Post-Conversion Total Units	55
Post-Conversion Unit Type	Family
Post-Conversion Development Name/Address	Strawberry Mansion, Strawberry Mansion neighborhood of North Philadelphia
Post-Conversion Sponsor	Philadelphia Housing Authority affiliate
Post-Conversion Bedroom Size	**# of Units**
0 BR	0
1 BR	8
2 BR	19
3 BR	24
4 BR	4
5 BR	0
6 BR	0

Transfer of Assistance	Yes
De Minimis Reduction	N/A
Transfer of Waiting List	This is a new construction project. A new site-based waiting list will be established for the development prior to the initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

Fiscal Year 2016 Moving to Work Annual Plan Amendment
Rental Assistance Demonstration Significant Amendment #2
Attachment 2 – Project Based Voucher Program (PBV)

Information on resident rights and participation, waiting list and grievance procedures for Rental Assistance Demonstration (RAD) program conversions to the Project Based Voucher (PBV) program are included in this attachment:

HUD PIH Notice 2012-32, REV-2 dated June 15, 2015, Sections 1.C and 1.D

HUD Joint Housing Notice H-2014-09/PIH-2014-17 in its entirety

C. PBV Resident Rights and Participation.

1. **No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households.[24] Once that remaining household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement.

2. **Right to Return.** See section 1.4.A.4(b) regarding a resident's right to return.

3. **Renewal of Lease.** Since publication of the PIH Notice 2012-32 Rev 1, the regulations under 24 CFR § 983.257(b)(3) have been amended requiring Project Owners to renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.

4. **Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or $25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

[24] These protections (as well as all protections in this Notice for current households) apply when in order to facilitate repairs a household is relocated following the conversion and subsequently returns to the property, even if they are considered a "new admission" upon return.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "standard TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the standard TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the standard TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP
- Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies may not alter this requirement.

5. **Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are current FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any remaining PH FSS funds, to serve those FSS participants who live in units converted by RAD. Due to the

program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the FY15 Appropriations Act), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g. escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.[25] Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents.

6. **Resident Participation and Funding.** In accordance with Attachment 1B, residents of Covered Projects with converted PBV assistance will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

7. **Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

[25] The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

i. **Termination Notification**. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
   a. A reasonable period of time, but not to exceed 30 days:
      i. If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
      ii. In the event of any drug-related or violent criminal activity or any felony conviction;
   b. 14 days in the case of nonpayment of rent; and
   c. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

ii. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional procedural rights to comply with section 6 of the Act.

For issues related to tenancy and termination of assistance, PBV program rules require the Project Owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:
   a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi),[26] an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
      i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
      ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.

[26] § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate has been repealed.

b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
d. The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

8. **Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

   Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion e.g., due to loss of employment; tenants that move into the property following conversion, etc.,) is covered by this waiver.

9. **Jobs Plus.** Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance at that site unless significant re-location and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project.

10. **When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may only select an occupied unit to be included under the PBV HAP contract if

the unit's occupants are eligible for housing assistance payments (24 CFR §983.53(d)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR §983.258). Since the rent limitation under this Section of the Notice may often result in a family's TTP equaling or exceeding the gross rent for the unit, for current residents (i.e residents living in the public housing property prior to conversion), HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP contract when TTP equals or exceeds than the Gross Rent. Further, HUD is establishing the alternative requirement that the rent to owner for the unit equal the family's TTP until such time that the family is eligible for a housing assistance payment. HUD is waiving as necessary to implement this alternative provision, the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR 983.301 as modified by Section 1.6.B.5 of this Notice.[27] In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP contract. Assistance may subsequently be reinstated if the tenant becomes eligible for assistance. The PHA is required to process these individuals through the Form- 50058 submodule in PIC.

Following conversion, 24 CFR §983.53(d) applies, and any new families referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has vacated the property; and, if the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating" units have been permitted, Section 1.6.B.10 of this Notice.

[27] For example, a public housing family residing in a property converting under RAD has a TTP of $600. The property has an initial Contract Rent of $500, with a $50 Utility Allowance. Following conversion, the residents is still responsible for paying $600 in tenant rent and utilities.

11. **Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR 983.259 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR 983.259 is waived. MTW agencies may not modify this requirement.

D. <u>PBV: Other Miscellaneous Provisions</u>

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.

2. **Additional Monitoring Requirement.** The PHA's Board must approve the operating budget for the Covered Project annually in accordance with HUD requirements.[28]

3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** This section has been moved to 1.4.A.13 and 1.4.A.14.

4. **Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:

    i. Transferring an existing site-based waiting list to a new site-based waiting list. If the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being

[28] For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of the evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list.

ii. Informing applicants on the site-based waiting list on how to apply for a PBV program-wide or HCV program-wide waiting list.

iii. Informing applicants on a public housing community-wide waiting list on how to apply for a voucher-wide, PBV program-wide, or site-based waiting list. If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the converted project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's public housing community-wide waiting list who wish to be placed onto the newly-established site-based waiting list must be done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).[29]

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA

[29] For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

5. **Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.

6. **Agreement Waiver.** This section has been moved to 1.6.(B)(7).

7. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of permanent debt during the HAP contract term, to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

8. **Administrative Fees for Public Housing Conversions during Transition Period**. For the remainder of the Calendar Year in which the HAP Contract is effective (i.e. "transition period"), RAD PBV projects will be funded with public housing funds. For example, if the project's assistance converts effective July 1, 2015, the public housing Annual Contributions Contract (ACC) between the PHA and HUD will be amended to reflect the number of units under HAP contract, but will be for zero dollars, and the RAD PBV contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time. .

   For fiscal years 2014 and 2015, PHAs operating HCV program received administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR § 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

   After this transition period, the section 8 ACC will be amended to include section 8 funding that corresponds to the units covered by the section 8 ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

9. **Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

   If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant-based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing an alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD.

   The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

   To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) and 24 CFR part 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

10. **Reserve for Replacement**. The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account covered under a General Depository Agreement (HUD-51999) or similar instrument, as approved by HUD, where funds will be held by the

Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines and as directed by HUD.

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

ASSISTANT SECRETARY FOR HOUSING-
FEDERAL HOUSING COMMISSIONER

Special Attention of:	**Notice** H 2014-09
Public Housing Agencies	PIH 2014-17
Public Housing Hub Office Directors	
Public Housing Program Center Directors	Issued: July 14, 2014
Regional Directors	
Field Office Directors	This notice remains in effect until amended,
RAD Transaction Managers	superseded, or rescinded.
	Cross Reference: PIH Notice 2012-32 (HA) REV 1

Subject: **Relocation Requirements under the Rental Assistance Demonstration (RAD) Program, Public Housing in the First Component**

1. Purpose

This Notice provides public housing agencies (PHAs)[1] and their partners with information and resources on applicable program and relocation assistance requirements when planning for or implementing resident moves as a result of a **Rental Assistance Demonstration (RAD)** conversion[2] under the first component of the demonstration.[3] This Notice provides guidance on RAD relocation requirements and requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA), as they relate to the public housing conversion process under the first component.[4]

[1] This Notice always uses the term "PHA" to refer to the owner of the project prior to and after the RAD conversion, even though, in some cases, the owner of the converted RAD project may be another public entity, a non-profit organization, or other owner (e.g., low-income housing tax credit owner). In addition, this Notice uses "PHA" to refer to the "displacing agency," a URA term that means the agency or person that carries out a program or project, which will cause a resident to become a displaced person. Projects vary and, for any specific task described in this Notice, may require substituting in a reference to a party that is more appropriate for a specific project.
[2] The content of this Notice should not be relied upon in carrying out any other activities funded under any other HUD program, except where specifically directed by HUD.
[3] The "first component" of RAD allows public housing and Moderate Rehabilitation properties to convert assistance; the "second component" refers to conversion of Rent Supplement, Rental Assistance Payment, and Moderate Rehabilitation properties upon contract expiration or termination.
[4] Relocation concerns and URA requirements apply to both components of RAD. This notice provides guidance only as to the first component.

Relocation assistance provided pursuant to public housing and RAD requirements is broader than URA relocation assistance requirements. Not all specific situations requiring relocation under RAD may trigger URA assistance requirements. In addition, whereas all qualifying residents[5] of a converting public housing project are eligible for relocation assistance under RAD, some residents or household members may not meet the statutory and regulatory requirements for eligibility under URA. This Notice supersedes PIH Notice 2012-32 (HA), REV-1, with respect to relocation matters. This Notice also specifically addresses when relocation may begin (see Section 9 below). As necessary, the Department will issue additional guidance on relocation issues and requirements as they relate to RAD.

2. Background

RAD allows public housing properties to convert assistance to long-term project-based Section 8 contracts. In many cases, a RAD project may require relocation of residents when properties undergo repairs, are demolished and rebuilt, or when the assistance is transferred to another site. PIH Notice 2012-32 REV-1 (see also FR Notice 5630-N-05, 78 FR 39759-39763 (July 2, 2013)) details RAD program requirements.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA) is a federal law that establishes minimum standards for federally-funded programs and projects that include the acquisition of real property (real estate) and/or displace persons from their homes, businesses, or farms as a result of acquisition, rehabilitation, or demolition of real property.[6] The URA will apply to acquisitions of real property and relocation of persons from real property that occurs as a direct result of acquisition, rehabilitation, or demolition for a project that involves conversion of assistance to Project-Based Voucher (PBV) or Project-Based Rental Assistance (PBRA) programs under RAD.

Additionally, all relocation conducted as part of a RAD conversion and all relocation assistance provided under URA must be consistent with applicable fair housing and civil rights laws, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973.

Because each RAD proposal varies in its scope, this Notice may not address each PHA's specific circumstances. RAD PHAs and participants should carefully review the regulations, notices, and guidance material referenced in this Notice. Any questions related to the applicability of these requirements should be referred to the RAD Transaction Managers (TM) or may be emailed to rad@hud.gov.

3. Applicable Legal Authorities

[5] The term "resident" as used in this Notice refers to eligible resident families of public housing residing in a property applying for participation in RAD or a property that undergoes a conversion of assistance through RAD.

[6] HUD Handbook 1378 (Tenant Assistance, Relocation, and Real Property Acquisition), available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/library/relocation/policyandguidance/handbook1378.

- RAD: Consolidated and Further Continuing Appropriations Act of 2012 (Public Law 112-55, approved November 18, 2011), with the implementing PIH Notice 2012-32, REV-1
- URA statute and implementing regulations: 49 CFR part 24
- FHEO: Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Fair Housing Act
- Section 104(d) of the Housing and Community Development Act of 1974, statute and implementing regulations (if CDBG and/or HOME funds are used): 24 CFR part 42, subpart C

4. Relocation Planning

If there is a possibility that residents will be relocated as a result of acquisition, demolition, or rehabilitation for a project converting under RAD, PHAs must undertake a planning process in conformance with URA in order to minimize the adverse impact of relocation (49 CFR 24.205(a)).

While a written Relocation Plan is not a requirement under RAD or URA, the Department strongly encourages PHAs to prepare a written Relocation Plan, both to establish their relocation process and to communicate this process consistently and effectively to all relevant stakeholders. Appendix 1 contains recommended elements of a Relocation Plan.

The following presents a general sequencing of relocation planning activities within the RAD milestones:

Stage	Activities
1. Prior to submission of RAD application	• Determine potential need for relocation • Meet with residents to discuss plans, communicate right to return, and solicit feedback • Provide *General Information Notice* (GIN) to residents • Survey residents to prepare Relocation Plan and relocation process cost estimate
2. After receipt of the Commitment to Enter into a HAP Contract (CHAP) Award	• Prepare Significant Amendment to PHA Plan • Assess and refine need for relocation • Develop a Relocation Plan (See Appendix 1 for recommended content) • Identify relocation housing options
3. Preparing Financing Plan (due to RAD Transaction Manager no later than 180 days following	• Budget for relocation expenses • Submit FHEO Accessibility & Relocation checklist (PHAs may submit Relocation Plan along with checklist)

Stage	Activities
CHAP award)	
4. Receipt of RAD Conversion Commitment (RCC)	• The date of issuance of the HUD RCC marks the date of "Initiation of Negotiations" (ION), as defined in the URA (49 CFR 24.2(a)(15)) • Provide residents with appropriate notice informing them if they will be relocated and any associated relocation assistance • Meet with residents to describe approved conversion plans and discuss required relocation
5. Closing/RAD conversion	• Generally, resident relocation should not begin until after the date of closing/conversion of assistance under RAD • PHAs must adhere to notification requirements (described in Paragraph 8 of this Notice): generally, a minimum of 30 days for residents to be temporarily relocated for up to a year, and 90 days for permanent relocation • PHAs seeking to move residents prior to closing must receive prior approval from HUD as described in Paragraph 9 of this Notice

5. Resident Right to Return

RAD program rules prohibit the permanent involuntary relocation of residents as a result of conversion. Residents that are temporarily relocated retain the right to return to the project once it has been completed and is in decent, safe, and sanitary conditions.[7] The period during which residents may need to be temporarily relocated is determined by the period of rehabilitation or construction, which will be specific to each project.

If proposed plans for a project would preclude a resident from returning to the RAD project, the resident must be given an opportunity to comment and/or object to such plans. If the resident objects to such plans, the PHA must alter the project plans to accommodate the resident in the converted project. If a resident agrees to such plans, the PHA must secure informed, written consent from the resident to receive permanent relocation assistance and payments consistent with URA and acknowledge that acceptance of such assistance terminates the resident's right to return to the project. In obtaining this consent, PHAs must inform residents of their right to return, potential relocation, and temporary and permanent housing options at least 30 days before residents must make a decision. The PHA cannot employ any tactics to pressure residents into

[7] Where the transfer of assistance to a new site is approved, residents of the converting project will have the right to reside in an assisted unit at the new site once rehabilitation or new construction is complete.

relinquishing their right to return or accepting permanent relocation assistance and payments.[8] A PHA may not terminate a resident's lease if it fails to obtain this consent.

PHAs must keep documentation of such information provided to residents and such consent by residents. While HUD does not require PHAs to submit documentation of obtaining this consent, PHAs and participants must properly brief residents on their housing and relocation options and must keep auditable written records of such consultation and decisions. HUD may request this documentation during a review of the FHEO Relocation and Accessibility Checklist or if relocation concerns arise.

Examples of project plans that may preclude a resident from returning to the converted RAD project include, but are not limited to:

- Changes in bedroom distribution (i.e. when larger units will be replaced with smaller units such that current residents would become under-housed or when smaller units will be replaced with larger units such that current residents would become over-housed);
- Where a PHA is reducing the number of assisted units at a property by a de minimis amount[9], but those units are occupied by assisted residents; or
- The reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to facilitate social service delivery.

In all scenarios where residents voluntarily accept permanent relocation to accommodate project plans, these residents are eligible for permanent relocation assistance and payments under URA. If a resident accepts permanent relocation assistance, the resident surrenders his or her right to return to the completed project.

6. <u>Relocation Assistance</u>

Under RAD, relocation assistance may vary depending on the length of time relocation is required.[10]

a. In instances when the PHA anticipates that a resident will be relocated for more than a year, the PHA must offer the resident the choice of:

    - Permanent relocation assistance and payments at URA levels; or
    - Temporary relocation assistance, including temporary housing, while the resident retains his or her right to return and reimbursement for all reasonable out-of-pocket expenses associated with the temporary relocation.

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[8] Persons with disabilities returning to the RAD project may not be turned away or placed on a waiting list due to a lack of accessible units. Their accessibility needs must be accommodated.

[9] A reduction in total number of assisted units at RAD project of 5% or less. (Section 1.5.B of PIH 2012-32 REV-1)

[10] Some residents may not qualify for relocation assistance under URA. A nonexclusive listing of persons who do not qualify as displaced persons under URA is at 49 CFR 24.2(a)(9)(ii). See also, Paragraph 1-4(J) of HUD Handbook 1378.

The PHA must give the resident no less than 30 days to decide between permanent and temporary relocation assistance. If the resident elects to permanently relocate with assistance at URA levels, the PHA must inform the resident that his or her acceptance of permanent relocation assistance terminates the resident's right to return to the completed RAD project.

b. In instances when a resident elects temporary relocation assistance and reoccupies a unit in the completed project within one year, the resident need not be offered permanent relocation assistance pursuant to URA.

   Great care must be exercised to ensure that residents are treated fairly and equitably. If a resident is required to relocate temporarily in connection with the project, his or her temporarily occupied housing must be decent, safe, and sanitary and the resident must be reimbursed for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation. These expenses include, but are not limited to, moving expenses and increased housing costs during the temporary relocation.

c. In the event that a resident elects to receive temporary relocation assistance and the temporary relocation exceeds one year, the resident becomes eligible for all permanent relocation assistance and payments under URA. (This assistance would be in addition to any assistance the person has already received for temporary relocation, and may not be reduced by the amount of any temporary relocation assistance.) In such event, the PHA shall give the resident the opportunity to choose to remain temporarily relocated for an agreed-to period (based on new information about when they can return to the completed RAD unit), or choose to permanently relocate with URA assistance.

   PHAs may not propose or request that a displaced person waive rights or entitlements to relocation assistance under the URA. If the resident elects to permanently relocate with URA assistance, the PHA must inform the person that the person's acceptance of URA relocation assistance to permanently relocate will terminate the person's right to return to the completed RAD project. Conversely, unless and until the resident elects to be permanently relocated, the resident may remain temporarily relocated with a right to return to the completed project.

7. Initiation of Negotiations (ION) Date

Eligibility for URA relocation assistance is generally effective on the date of initiation of negotiations (ION) (49 CFR 24.2(a)(15)). For RAD projects, the ION date is the date of the issuance of the RAD Conversion Commitment (RCC).

8. Resident Notification

When a project converting under RAD will include relocation of residents, notice must be provided to those resident households. For each notice listed below, one notice shall be given to each resident household. The purpose of these notifications is to ensure that residents are

informed of their potential rights and the relocation assistance available to them. During initial meetings with residents about RAD and in subsequent communications with residents related to relocation, the PHA should inform residents that if they choose to move after receiving a written GIN, but prior to receiving a RAD Notice of Relocation, they may jeopardize their eligibility for relocation assistance. However, PHAs should note that a resident move undertaken as a direct result of the project may still require relocation assistance and the resident may be eligible to receive permanent relocation assistance under the URA even though the PHA has not yet issued notices.

a. *General Information Notice* (49 CFR 24.203(a) & Handbook 1378, Paragraph 2-3(B))

As soon as feasible in the planning process, the PHA must provide each resident with a written GIN (see sample in Appendix 2) to provide a general description of the project, the activities planned, and the relocation assistance that may become available. URA regulations state that the GIN should be provided *as soon as feasible*. Under RAD, PHAs must provide GINs during the initial RAD resident meetings, before submitting a RAD application. GINs must do at least the following:

- Inform the resident that he or she may be displaced for the project and generally describe the relocation payment(s) for which the resident may be eligible, the basic conditions of eligibility, and the procedures for obtaining the payment(s);
- Inform the resident that he or she will be given reasonable relocation advisory services, including referrals to replacement properties, help in filing payment claims, and other necessary assistance to help the resident successfully relocate;
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she will not be required to move without at least 90 days advance written notice, and inform any person to be displaced from a dwelling that he or she cannot be required to move permanently unless at least one comparable replacement dwelling has been made available;
- Inform the resident that any person who is an alien not lawfully present in the United States is ineligible for relocation advisory services and relocation payments, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child (see 49 CFR 24.208(h) for additional information); and
- Describe the resident's right to appeal the PHA’s determination as to a person's eligibility for URA assistance.

b. *RAD Notice of Relocation*

If a resident will be relocated to facilitate the RAD conversion, the PHA shall provide notice of such relocation (RAD Notice of Relocation). The PHA shall issue this notice upon the PHA’s receipt of the RCC from HUD, which is the ION date.

If residents will not be relocated, notice of relocation is not required, but the PHA should

notify them that they are not being relocated.[11]

The RAD Notice of Relocation must conform to the following requirements:

- The notice must state the anticipated duration of the resident's relocation.
- PHAs must provide this notice a minimum of 30 days prior to relocation to residents who will be temporarily relocated.[12] Longer notice may be appropriate for persons who will be relocated for an extended period of time (over 6 months), or if necessary due to personal needs or circumstances.
- Residents whose temporary relocation is anticipated to exceed one year must be informed that they will have no less than 30 days to elect temporary or permanent relocation as described in Section 6 of this Notice. When timing is critical for project completion, the 30-day decision period can run concurrently with the 30-day notice period for temporary relocation and with the 90-day period for permanent relocation if the PHA makes available comparable replacement dwellings consistent with 24.204(a).
- Residents who will be permanently relocated must receive written notice a minimum of 90 days prior to relocation. This 90-day time period may only begin once the PHA has made available at least one comparable replacement dwelling consistent with 49 CFR 24.204(a).[13]
- The notice must describe the available relocation assistance, the estimated amount of assistance based on the individual circumstances and needs, and the procedures for obtaining the assistance. The notice must be specific to the resident and his or her situation so that the resident will have a clear understanding of the type and amount of payments and/or other assistance the resident household may be entitled to claim.
- The notice must explain the reasonable terms and conditions under which the resident may continue to lease and occupy a unit in the completed project.
- The notice must state that the PHA will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with any temporary move. These expenses include, but are not limited to, moving expenses and increased housing costs (rent, utilities, etc.).

c. *Notice of Intent to Acquire* (49 CFR 24.203(d))

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[11] HUD policy generally requires a "notice of non-displacement" in certain instances; the RAD program does not require this notice. Although the scope of this notice is limited to guidance for projects requiring relocation, PHAs should note, however, that there may be notification requirements for projects that do not involve relocation. The RAD conversion will terminate the resident's public housing lease and commence a PBV or PBRA lease, even when there is no relocation required. In such instances, state law may impose certain notification requirements. In addition, public housing regulations generally require 30 days' notice prior to lease termination. PHAs are encouraged to review public housing requirements set forth in 24 CFR parts 5 and 966.

[12] HUD may approve shorter notice periods based on an urgent need due to danger, health, or safety issues or if the person will be temporarily relocated for only a short period.

[13] PHAs should note that URA regulations also require, where possible, that three or more comparable replacement dwellings be made available before a resident is required to move from his or her unit.

For RAD projects involving acquisition, residents may be provided with a notice of intent to acquire ("*Notice of Intent to Acquire"*) prior to the ION date with HUD's prior approval. Once the Notice of Intent to Acquire is provided, a resident's eligibility for relocation assistance and payments is established. Therefore, the RAD Notice of Relocation must be provided in conjunction with or after the Notice of Intent to Acquire. A RAD Notice of Relocation would not otherwise be sent prior to the ION date.

Since residents who accept permanent relocation must receive 90 days advanced written notice prior to being required to move, providing residents the Notice of Intent to Acquire and RAD Notice of Relocation prior to the ION date may be necessary to provide sufficient notice of relocation to a resident in instances where there may not be 90 days between the issuance of the RCC (ION date) and the anticipated closing date. This allows the PHA to issue the notice earlier so that relocation may begin upon closing. This allows program participants to conduct orderly relocation upon closing, minimize adverse impacts on displaced persons, and to expedite project advancement and completion.[14]

d. *URA Notice of Relocation Eligibility – for residents whose temporary relocation exceeds one year* (49 CFR 24.203(b) & Handbook 1378, Paragraph 2-3(C))

After a resident has been temporarily relocated for one year, the PHA must provide a notice of relocation eligibility in accordance with URA requirements ("*Notice of Relocation Eligibility*"). This notice is not required if the resident has already accepted permanent relocation assistance.

The Notice of Relocation Eligibility must conform to URA requirements as set forth in 49 CFR Part 24, to HUD Handbook 1378 and to the following requirements:

- The PHA must provide updated information as to when it is anticipated that the resident will be able to return to the completed project.
- The resident may choose to remain temporarily relocated based upon such updated information or may choose to accept permanent URA relocation assistance in lieu of exercising the right to return.
- If the resident chooses to accept permanent URA relocation assistance and such assistance requires that the resident move, the URA requires such resident to receive 90 days advance written notice of the earliest date they will be required to move (i.e., 90-Day Notice, 49 CFR 24.203(c)). The PHA should be mindful that the 90-day time period may only begin once the PHA has made available at least one "comparable replacement dwellings" as set forth in 49 CFR 24.204(a).

9. <u>Initiation of Relocation</u>

[14] PHAs and program participants should note that, in most instances, it will be most appropriate for the acquiring entity to send this notice.

Unless otherwise approved by HUD, relocation may not begin until the date of closing of the RAD transaction and recordation of the RAD Use Agreement. PHAs must provide residents being temporarily relocated at least 30 days advance written notice of the required move. PHAs must give residents being permanently relocated at least 90 days advance written notice of the required move. This means PHAs are advised to plan carefully to account for this 30-day or 90-day notice period to ensure the closing is not delayed.

However, HUD is aware that, in rare cases, some project plans necessitate relocation prior to closing. With prior HUD approval, for projects involving acquisition, PHAs may relocate residents prior to the closing date subject to public housing requirements (see 24 CFR part 5 and 24 CFR 966). PHAs must contact their assigned RAD transaction manager (TM) to discuss plans as early as possible in the process to ensure compliance with all RAD and URA requirements.

If relocation prior to closing is desired, PHAs should submit to the TM the following information, as early as possible in the process:

- A written request for relocation prior to closing. The request must include justification of why the early relocation is necessary for the viability of the RAD transaction. Justification may include the presence of outside financing, such as Low Income Housing Tax Credit (LIHTC) awards, if the PHA can show that early relocation is necessary to meet critical LIHTC deadlines.
- FHEO Accessibility and Relocation Checklist.
- Evidence of intent to comply with public housing requirements, as applicable. Generally, public housing regulations require public housing residents to receive 30 days' notice prior to relocation and that such notice either be published in the PHA's admissions and continued occupancy policies (ACOP) or published elsewhere at least 30 days prior to receipt of such notice (24 CFR parts 5 and 966).

When seeking to relocate residents prior to closing, submission of this request as early as possible is preferred, prior to the 180-day Financing Plan milestone if possible (with Financing Plan submission following the request).

HUD reserves the right to request additional follow-up information, including a Relocation Plan and related budget, prior to approving such requests. PHAs must receive written HUD approval before beginning relocation of residents prior to closing.

Early planning and submission of the Financing Plan and FHEO checklist to HUD will ensure the PHA has built in the 30- or 90-day notice period prior to initiating relocation.

10. Fair Housing and Civil Rights Requirements

PHAs must comply with all applicable fair housing and civil rights laws, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973, when conducting relocation planning and providing relocation assistance. Further, communication must be provided in a manner that is effective for persons

with disabilities (24 CFR 8.6) and for person who are Limited English Proficient (see 72 FR 2732). This section discusses some of the PHA's obligations under these laws and regulations. However, the applicability of civil rights laws is not limited to the activities discussed in this section. PHAs conducting relocation activities should familiarize themselves with applicable civil rights statutes, regulations, and guidance, including but not limited to, those listed at the end of this section.

- Effective Communication for Persons with Disabilities: Communications and materials must be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 CFR 8.6), and as applicable, the Americans with Disabilities Act; and for persons who are limited English proficient (*see* 72 Fed Reg 2732). This includes ensuring that training materials are in appropriate alternative formats as needed, e.g., Braille, audio, large type, assistive listening devices, and sign language interpreters.

- Accessible Meeting Facilities for Persons with Disabilities: When holding public meetings, PHAs must give priority to methods that provide physical access to individuals with disabilities, i.e., holding the meetings, workshops, and briefings or any other type of meeting in an accessible location, in accordance with the regulations implementing Section 504 of the Rehabilitation Act of 1973 and Titles II and III of the Americans with Disabilities Act of 1990, as applicable. All programs and activities must be held in accessible locations unless doing so would result in an undue financial and administrative burden, in which case the PHA must take any action that would not result in such an alteration or such burden but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity, e.g., briefings at an alternate accessible, in-home briefing. Individuals with disabilities must receive services in the most integrated setting appropriate to their needs. The most integrated setting appropriate to the needs of qualified individuals with disabilities is a setting that enables individuals with disabilities to interact with nondisabled person to the fullest extent possible (28 CFR part 35, appendix B).

- Meaningful Access for Persons with Limited English Proficiency (LEP): PHAs must provide meaningful access to programs and activities for persons who have a limited ability to read, speak, or understand English. Any person with LEP who will be temporarily relocated or permanently displaced must have meaningful access to any public meetings regarding the project. In addition, any information provided to residents including, but not limited to, any notices required under the URA, should be provided in the appropriate language to persons with LEP. Generally, PHAs will be responsible for providing oral interpreters at meetings, including ensuring their competence, and covering any associated translation and interpretation costs.

- URA requires that PHAs provide persons who are unable to read or understand the notices, such as persons with disabilities or persons with LEP, with appropriate translation and counseling to ensure that they understand their rights and responsibilities and the assistance available to them (49 CFR 24.5). URA also requires that each notice indicate the name and telephone number of a person to contact with questions or for other

needed help (49 CFR 24.5). This notice should include the number for the telecommunication device for the deaf (TDD) or other appropriate communication device, if applicable (24 CFR 8.6(a)(2)).

- Comparable Housing for Persons with Disabilities: PHAs should identify the accessibility needs of residents to be relocated by consulting existing information (e.g., tenant characteristics forms, including identification of the need for accessible unit features; records of approved reasonable accommodations, and records of the presence of accessible unit features). For guidance on providing relocation assistance to persons with disabilities, see Exhibit 3-1 in HUD Handbook 1378.

- Advisory Services: PHAs should determine the advisory services that will be necessary to ensure a successful relocation program consistent with 49 CFR 24.205(c). Such advisory services may include housing counseling that should be facilitated to ensure that residents affected by the project understand their rights and responsibilities and the assistance available to them (49 CFR 24.205(c)). Advisory counseling must also inform residents of their fair housing rights and be carried out in a manner that satisfies the requirements of Title VI of the Civil Rights Act of 1964, the Fair Housing Act, and Executive Order 11063 (49 CFR 24.205(c)(1)). In addition, PHAs should inform residents that if they believe they have experienced unlawful discrimination, they may contact HUD at 1-800-669-9777 (Voice) or 1-800-927-9275 (TDD) or at http://www.hud.gov.

Fair Housing References:

- Section 504 of the Rehabilitation Act of 1973
- Regulations: 24 CFR part 8
- Fair Housing Act Regulations: 24 CFR part 100
- Title VI of the Civil Rights Act of 1964
- Regulations: 24 CFR part 1
- Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (LEP Guidance) (72 FR 2732)
- Exhibit 3-1 Compliance with Section 504 of the Rehabilitation Act in HUD Handbook 1378 (Tenant Assistance Relocation and Real Property Acquisition)

11. Other Requirements

a. Public Housing Program Compliance
PHAs should note that public housing resident provisions related to occupancy and termination, including grievances and related hearings, will remain in effect until the execution of the new PBV or PBRA Housing Assistance Payment (HAP) contract.

b. Evictions for Cause
If the PHA determines that a resident was evicted in accordance with applicable state and local law for serious or repeated violation of material terms of the lease, and the eviction was not undertaken for the purpose of evading the obligation to make available URA payments and other assistance, the resident is not entitled to relocation payments and assistance under the URA (49 CFR 24.206).

Jemine A. Bryon
General Deputy Assistant Secretary for
Public and Indian Housing

Carol Galante, Federal Housing
Commissioner – Assistant Secretary for
Housing

APPENDICES

Appendix 1
Recommended Relocation Plan Contents

Appendix 2
Sample RAD General Information Notice (GIN)

Appendix 3
Sample RAD Notice of Relocation (for relocation anticipated for a year or less)

Appendix 4
Sample RAD Notice of Relocation (for relocation anticipated for more than a year)

Appendix 5
Sample Notice of Eligibility for URA Relocation Assistance (for residents who have been temporarily relocated for more than a year)

Appendix 1: RECOMMENDED RELOCATION PLAN CONTENTS

While written Relocation Plans are not required under RAD or URA, the Department strongly encourages PHAs to document their relocation planning process and procedures in a written Relocation Plan. The following provides suggested content for Relocation Plans.

I. Project Summary

The Relocation Plan should provide a general description of and purpose for the project (e.g., year built, location, number of units, configuration, occupancy information, and funding sources).

The basic components of a plan include:

- A general description of the project and the site, including acquisition, demolition, rehabilitation, and construction activities and funding sources;
- A detailed discussion of the specific steps to be taken to minimize the adverse impacts of relocation, including when transferring the assistance to a new site;
- Information on occupancy (including the number of residents, residential owner-occupants and non-residential occupants, if any, to be permanently or temporarily relocated);
- Information on relocation needs and costs (including the number of residents who plan to relocate with Section 8 assistance);
- General moving assistance information;
- Temporary move assistance (including information on the duration of temporary moves);
- Permanent move assistance; and
- Appeals process.

II. Resident Return and Re-occupancy Policies

For residents that will be temporarily relocated, the plan should include the criteria that will be used to determine the priority for residents to re-occupy units at the project after rehabilitation, demolition, and/or construction is completed. For example, if units will come online in stages, the plan should outline how the PHA will determine when each resident will return to the project. PHAs should ensure that any written return or re-occupancy policy is compliant with related RAD requirements, such as the right-to-return policy and the “no re-screening upon conversion” policy, as described in the RAD Notice.

III. Summary of Moving Costs

The plan should include a summary of moving costs, identified by move types, including the following:

Temporary Moves

- Number of and cost amount for two-way moves (i.e., a move to another unit and then a return move) within the same building/complex.
- Number of and cost amount for two-way moves to a unit not in the same building/complex, carried out by the PHA.
- Number of and cost amount for two-way moves to a unit not in the same building/complex not carried out by the PHA.

Permanent Moves

- Number of and cost amount for one-time moves into another unit in the same building/complex.[15]
- Number of and cost amount for one permanent move to a unit not within the same building/complex, carried out by the PHA.
  PHAs should note that if a residential move is carried out by the PHA at no cost to the resident, this per-household estimate must include the required dislocation allowance (currently $100). The URA Fixed Residential Moving Cost Schedule lists the most current dislocation allowance:
  http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm
- Number of and cost amount for one permanent move to a unit not within the same building/complex that is not carried out by the PHA.

IV. Temporary Relocation Assistance

The PHA will assist residents who are required to move temporarily. At the Initiation of Negotiations (ION), the PHA will send a RAD Notice of Relocation to residents who will be relocated. Appendices 3 and 4 of this Notice contain sample RAD Notices of Relocation to be provided to residents that will be temporarily relocated.

The plan should detail the temporary relocation assistance the PHA will provide for residents (Paragraph 2-7 of HUD Handbook 1378). This assistance includes:

- Temporary Housing - The PHA will provide temporary housing that is decent, safe, and sanitary on a nondiscriminatory basis for residents who are relocated temporarily. The PHA will also pay for reasonable increased housing costs that the resident incurs in connection with the temporary relocation.

  NOTE: If a resident's relocation exceeds one year, the PHA must then issue a *Notice of Relocation Eligibility* (49 CFR 24.203(b)) to the resident and offer the resident permanent

[15] A resident who moved to another unit in the same building/complex may be considered a displaced person under URA if the resident moves from the building/complex permanently and was not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move within the same building/complex and/or if other conditions of the move within the building/complex were not reasonable.

relocation assistance and payments at URA levels. The PHA must provide this notice to affected residents as soon as the temporary relocation exceeds one year.

- Packing and Moving Assistance - Since most residents prefer to pack their own personal possessions and items of value, they should be provided packing instructions, boxes, markers, and tape for the move. If assistance in packing is needed, the PHA should provide the resident with information on how to request this assistance. The PHA is responsible for covering all reasonable moving expenses incurred in connection with temporarily relocating a resident. The PHA may reimburse the resident's out-of-pocket moving expenses and/or directly carry out the move.

- Payment for Temporary Relocation Moving Expenses - The plan should also indicate how the PHA intends to provide or reimburse for moving services and expenses. The PHA can choose to do one or more of the following:
  - Undertake the moves itself, using force account labor or a moving company;
  - Use PHA's contractor or moving company;
  - Carry out moves with employees of the PHA;
  - Reimburse residents for all actual and reasonable moving costs.

  NOTE***:*** The PHA will not make fixed payments since such payments may not be representative of actual reasonable costs incurred. However, in order for a resident to be sure of full reimbursement, the resident should submit a moving cost estimate to the PHA for approval prior to the move unless the PHA is directly carrying out the move and the resident will not incur any reasonable out-of-pocket moving expenses. Failure to do so may result in the resident not being fully reimbursed.

- Utility Costs - The PHA is responsible for covering the expenses relating to disconnection and reconnection of necessary utilities. If the resident has telephone, cable service or Internet access, the PHA is responsible for covering the expenses involved in transferring existing service. The PHA may also pay utility deposits, if required at the temporary relocation housing (HUD Handbook 1378, paragraph 2-7(A)(3)). If a resident is temporarily relocating from a public housing unit to a non-public housing unit, the resident must be reimbursed for reasonable increases in utility costs even if the PHA utility allowance is lower than the actual costs to the resident.

V. Permanent Relocation Assistance

Based on the local housing resources available, the PHA should identify the replacement housing options that will be available to meet the housing needs of residents to be permanently relocated. Replacement housing options for residents that meet the definition of a "displaced person" (49 CFR 24.2(a)(9)) under the URA include, but are not limited to:

- Other Public Housing;
- Section 8 Project-Based Voucher unit;
- Section 8 Housing Choice Voucher unit;
- Homeownership housing;

- Private-market rental housing (affordable, non-subsidized).[16]

The plan should describe each type of replacement housing projected to be available, including:

1. Number of units, by bedroom size, expected to be available, and discussion of whether available units will meet dwelling requirements of relocated residents;
2. General area or location of unit(s);
3. Criteria for receiving relocation assistance; and
4. Any other information that might benefit residents in their consideration of housing choices.

The plan should include a description of the permanent relocation assistance the PHA will provide to residents. This assistance includes:

- Availability of Comparable Replacement Housing – Under URA, no displaced resident will be required to move unless at least one comparable replacement dwelling (49 CFR 24.2(a)(6)) is made available at least 90 days before the required move (49 CFR 24.203(c)). Comparable replacement dwellings must contain the accessibility features needed by displaced persons with disabilities (49 CFR 24.2(a)(8)(vii); 49 CFR part 24, Appendix A, §24.2(a)(8)(vii)). If the comparable replacement dwelling is not subsidized housing, the PHA should contact the RAD staff for advice on replacement housing payment requirements.

- Referral to Housing Not Located in an Area of Minority Concentration - Whenever possible, minority persons shall be given reasonable opportunities to relocate to decent, safe, and sanitary replacement dwellings that are within their financial means and not located in areas of minority concentration (49 CFR 24.205(c)(2)(ii)(D)). However, this policy does not require a PHA to provide a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling unit.

- Permanent Relocation Moving Expenses from Public Housing to Public Housing - The PHA may choose one of the following options for covering the expenses involved in moving public housing residents that are relocated into other public housing:

  - Undertake the move itself, using force account labor or a moving company. Residents should incur no moving costs under this option, but if such expenses are incurred, the PHA is responsible for reimbursing the resident for any such actual and reasonable expenses. In such case, the resident is also entitled to a dislocation allowance (currently $100). The URA Fixed Residential Moving Cost Schedule lists the current dislocation allowance and is available at: http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm

[16] Every effort should be made to find another subsidized unit as replacement housing for a resident relocating from subsidized housing so that the resident will continue receiving the housing subsidy as long as it is needed.

NOTE: Residents who prefer to pack their own personal possessions and items of value may be provided packing instructions, boxes, markers, and tape for their move. If a resident needs assistance in packing, they should contact the PHA. It is the responsibility of the PHA to pack and move all of their belongings and household goods, if so desired.

- Allow the resident to elect one of the following choices:

  1) The PHA will reimburse the resident for the cost of all actual reasonable and necessary moving and related expenses (49 CFR 24.301), such as:
     - Transportation of the resident and personal property. This may include reimbursement at the current mileage rate for personally owned vehicles that need to be moved. Transportation costs for a distance beyond 50 miles are not eligible, unless the PHA determines that relocation beyond 50 miles is justified.
     - Packing, crating, uncrating, and unpacking of personal property.
     - Storage of personal property for a period not to exceed 12 months, unless the PHA determines that a longer period is necessary.
     - Disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property.
     - Insurance for the replacement value of the property in connection with the move and necessary storage.
     - The replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.

  2) The PHA will pay directly to the resident the applicable and current fixed moving cost payment according to the URA Fixed Residential Moving Cost Schedule (49 CFR 24.302), available at: http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm

- Permanent Relocation Moving Expenses for All Other Moves – Under URA, residents who are permanently displaced, except for those residents displaced from public housing and moving to other public housing, are entitled to the assistance described in the brochure *Relocation Assistance To Residents Displaced From Their Homes,* available in English at http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_16280.doc and in Spanish at http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_16281.doc. Residents may choose moving assistance from one of the following two options.

  1) The PHA will reimburse the resident for the cost of all actual reasonable moving and related expenses (49 CFR 24.301).

  2) The PHA will pay directly to the resident the applicable and current fixed moving cost payment according to the URA Fixed Residential Moving Cost Schedule (49

CFR 24.302), available at: http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm.

- Replacement Housing Payment - In addition to covering moving expenses, displaced residents may be entitled to a replacement housing payment (RHP). This payment is intended to cover the increase, if any, in monthly housing costs for a 42-month period.

  When calculating the RHP, the PHA must consider the comparable replacement housing unit offered to the resident. Since the PHA is not required to pay an RHP amount that exceeds the amount of RHP calculated for the offered comparable replacement dwelling, residents are cautioned to work closely with the PHA prior to their move.

- Accessible Housing for Persons with Disabilities - Under the URA, persons with disabilities who will be permanently displaced must be relocated to a replacement dwelling that contains the accessibility features they need (49 CFR 24.2(a)(8)(vii); 49 CFR Appendix A, 24.2(a)(8)(vii)). A person with disabilities who has been relocated must be offered a comparable replacement dwelling unit that contains accessible features comparable to the housing from which the tenant has been displaced or relocated. This is so even if the tenant has paid for the acquisition and/or installation of accessible features in the housing from which he or she has been relocated; in such instances, the recipient must ensure that the replacement housing contains comparable accessible features or provide relocation assistance to the tenant in an amount that covers the cost of acquiring and/or installing comparable accessible features. Under the URA, an agency may use project funds to remove architectural barriers for displaced owners and tenants with disabilities or take other last resort housing measures if comparable replacement dwelling units are not available within the monetary limits prescribed under the URA regulations (49 CFR 24.404(c)(vii); HUD Handbook 1378, Paragraph 3-8).

VI. **Relocation Budget**

Based on the results of the planning process, the PHA should create a relocation budget that includes the following six components:

1) The cost of administering the plan and providing assistance and counseling.

2) Reasonable moving expenses for a person with disabilities, which may include the cost of moving assistive equipment that is the personal property of the residents, the furnishings and personal belonging of a live-in aide, and/or other reasonable accommodations (HUD Handbook 1378, Paragraph 3-2).

3) The cost of the physical move of the residents' belongings. (It is suggested that the move costs be broken down by average cost per move type multiplied by the number of moves.)
   NOTE: This physical move cost total should be based on the move scenarios anticipated

or projected by the resident survey.

4) The cost estimated to pay for projected increases in monthly housing costs for temporary relocation.

5) The cost estimated to pay for the replacement housing payment (RHP) (42-month period for URA or 60-month period if section 104(d) applies).

6) Contingency costs estimated for carrying out the relocation process necessary to complete the proposed project. (The PHA should state where these costs are indicated in the application, or attach any other information required by HUD, to support these costs.)

VII. Appeal Process

If a resident disagrees with the PHA's decision as to the resident's eligibility to receive relocation assistance, the amount of a relocation payment, or the adequacy of a comparable replacement dwelling offered to a resident, the resident may file a written appeal to the PHA. The Relocation Plan should describe the specific appeal procedures to be followed consistent with 49 CFR 24.10 (and 24 CFR 42.390 if section 104(d) is involved). At a minimum, the resident will have 60 days to file an appeal with the PHA after receiving written notification of a claim or ineligibility determination.

VIII. Certification

The plan should contain a certification of compliance with the URA and, if applicable, section 104(d).

Technical Assistance

The PHA should direct questions on this Notice's relocation assistance requirements to their RAD Transaction Manager or email rad@hud.gov.

Appendix 2: SAMPLE RAD GENERAL INFORMATION NOTICE (GIN)

PHA LETTERHEAD

RENTAL ASSISTANCE DEMONSTRATION (RAD)
GENERAL INFORMATION NOTICE (GIN)

[Date]

Dear [Resident Name],

The property you currently occupy is being proposed for participation in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. At this time, we expect that [the proposed acquisition, rehabilitation or demolition, may require you to be relocated (temporarily or permanently) from your unit]. We will provide further details to you as plans develop. **This notice does not mean that you need to leave the property at this time. This is not a notice of eligibility for relocation assistance.** The remainder of this letter only applies to situations where you will need to be relocated from your unit.

This notice serves to inform you of your potential rights under the RAD program and a federal law known as the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). If the proposed RAD project receives HUD approval and if you are displaced permanently as a result, you may become eligible for relocation assistance and payments under the URA, including:

1) Relocation advisory services that include referrals to replacement properties, help in filing payment claims and other necessary assistance to help you successfully relocate;
2) At least 90 days' advance written notice of the date you will be required to move;
3) Payment for moving expenses; and
4) Payments to enable you to rent a similar replacement home.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an immigrant lawfully present in the United States.

As a resident of a property participating in RAD, you have the right to return to the project after the project is complete. You will be able to lease and occupy a unit in the converted project when rehabilitation is complete.

If you are permanently displaced from your home, you will not be required to move until you are given at least 90-day advance written notice of any required move and at least one comparable replacement dwelling has been made available to you. If you are temporarily relocated and your temporary relocation lasts more than one year, you will be contacted and offered permanent relocation assistance as a displaced person under the URA. This assistance would be in addition

to any assistance you may receive in connection with temporary relocation and will not be reduced by the amount of any temporary relocation assistance you have already received.

If you are required to relocate from the property in the future, you will be informed in writing. [PHA] will inform you of what assistance and payments you are eligible for if you will be relocated because of RAD and how you will receive these payments. If you become a displaced person, you will be provided reasonable assistance necessary to complete and file any required claim to receive a relocation payment. If you feel that your eligibility for assistance is not properly considered, you will also have the right to appeal a determination on your eligibility for relocation assistance.

You should continue to pay your rent and meet any other requirements specified in your lease. If you fail to do so, [PHA] may have cause for your eviction. If you choose to move, or if you are evicted, prior to receiving a formal notice of relocation eligibility, you may become ineligible to receive relocation assistance. It is very important for you to contact us before making any moving plans.

You will be contacted soon so that we can provide you with more information about the proposed project. If the project is approved, we will make every effort to accommodate your needs. In the meantime, if you have any questions about our plans, please contact: [Name, Title, Address, Phone, Email Address]. This letter is important to you and should be retained.

Sincerely,

[Name]
[Title]

NOTES:

1. Files must indicate how this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378)
2. This is a sample GIN. PHAs should revise it to reflect project-specific circumstances.
3. PHAs may provide residents with HUD brochure "Relocation Assistance To Residents Displaced From Their Homes" available at: http://www.hud.gov/offices/cpd/library/relocation/publications/1042.pdf.

Appendix 3: SAMPLE RAD NOTICE OF RELOCATION (For relocation anticipated for a year or less)

THIS IS A GUIDE FORM.
REVISE TO REFLECT THE PROJECT-SPECIFIC CIRCUMSTANCES.

PHA Letterhead

(date)

Dear [*Resident Name*],

The property you currently occupy is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. On [*date*], the [*Public Housing Authority*] (PHA) notified you of proposed plans to [acquire/ rehabilitate/demolish] the property you currently occupy at [*address*]. On [*date*], HUD issued the RAD Conversion Commitment (RCC) and committed federal financial assistance to the project. [*In instances where a Notice of Intent to Acquire is applicable and this notice is being sent before the RCC is issued, in lieu of the previous sentence noting the RCC issuance date, insert:* [*Name of entity acquiring the property*] (Displacing Agency) intends to acquire the property you currently occupy. **This is a Notice of Intent to Acquire.**]

In order for PHA to complete the project, you will need to be relocated for [*anticipated duration of relocation*]. Upon completion of the project, you will be able to lease and occupy your present unit or another decent, safe and sanitary unit in the completed project under reasonable terms and conditions. You are eligible for relocation payments and assistance.

However, **<u>you do not need to move now</u>.** This notice informs you that a decent, safe, and sanitary dwelling unit, listed below, has been made available to you and you will be required to move by [*insert date at least 30 days after the date of this notice*].

If your temporary relocation exceeds one year and you qualify as a "displaced person" under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), you may be eligible for further relocation assistance and payments under URA.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

The relocation assistance to which you are entitled includes:

- <u>Payment for Moving Expenses</u>. You are entitled to be reimbursed for all reasonable out-of-pocket expenses incurred in connection with any temporary

move. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 4 of this Notice.*]

- The location of your temporary replacement unit is [*address*]. This temporary housing has been determined to be decent, safe and sanitary.

- [*List appropriate relocation advisory services and any other services and assistance provided.*]

If you disagree with this determination, you may file a written appeal to the PHA in accordance with 49 CFR 24.10.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [*Name, Title, Address, Phone, Email Address*] before you make any moving plans. He/she will assist you with your move to a temporary unit and help ensure that you preserve your eligibility for any relocation payments to which you may be entitled.

Remember, do not move or commit to the purchase or lease of a replacement home before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

_____
Print name:
Title:

NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)

Appendix 4: SAMPLE RAD NOTICE OF RELOCATION (For relocation anticipated for more than a year)

THIS IS A GUIDE FORM.
REVISE TO REFLECT THE PROJECT-SPECIFIC CIRCUMSTANCES.

PHA Letterhead

(date)

Dear [*Resident Name*],

The property you currently occupy is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. On [*date*], the [*Public Housing Authority*] (PHA), notified you of proposed plans to [acquire/ rehabilitate/demolish] the property you currently occupy at [*address*]. On [*date*], HUD issued the RAD Conversion Commitment (RCC) and committed federal financial assistance to the project. [*In instances where a Notice of Intent to Acquire is applicable and this notice is being sent before the RCC is issued, in lieu of the previous sentence noting the RCC issuance date, insert:* [*Name of entity acquiring the property*] (Displacing Agency) intends to acquire the property you currently occupy. **This is a Notice of Intent to Acquire.**]

In order for PHA to complete the project, you will need to be relocated for [*anticipated duration of relocation*]. Upon completion of the project, you will be able to lease and occupy your present unit or another decent, safe and sanitary unit in the completed project under reasonable terms and conditions. You are eligible for relocation assistance and payments. Because we expect your relocation to exceed one year, you have the choice to either:

- Receive temporary relocation assistance and return to a unit in the RAD project once it is complete; or
- Receive permanent relocation assistance and payments consistent with the URA instead of returning to the completed RAD project.

You must inform us of your choice within 30 days.

However, **<u>you do not need to move now</u>.** If you choose temporary relocation assistance, you will not be required to move sooner than 30 days after you receive notice that a temporary unit is available for you. If you choose permanent relocation assistance, you will not be required to move sooner than 90 days after you receive written notice that at least one comparable replacement unit is available to you in accordance with 49 CFR 24.204(a). [*Note to PHA: These time periods may start running as of the date of this Notice if the notice of relocation includes such information on the temporary and/or comparable replacement dwelling options, as applicable. In such circumstance, add applicable sentences to adequately notify the resident. For example:* This notice informs you that a temporary unit, listed below, has been made available to you and, if you choose this option, you will be required to move by [*date no sooner than 30 days after notice*]. This notice informs you

that a comparable unit, listed below, has been made available to you and, if you choose this option, you will be required to move by [*date no sooner than 90 days after notice*].]

If you choose temporary relocation, your relocation exceeds one year and you qualify as a "displaced person" under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), you may become eligible for further relocation assistance and payments under URA.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

If you choose to receive temporary relocation assistance, this assistance will include:

- Payment for Moving Expenses. You are entitled to be reimbursed for all reasonable out-of-pocket expenses incurred in connection with any temporary move. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 4 of this Notice.*]

- The location of your temporary replacement unit is [*address*]. This temporary housing has been determined to be decent, safe and sanitary.

- [*List appropriate relocation advisory services and any other services and assistance provided.*]

If you elect to receive permanent relocation assistance, this assistance will include:

- Relocation Advisory Services. You are entitled to receive current and continuing information on available comparable replacement units and other assistance to help you find another home and prepare to move.

- Payment for Moving Expenses. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 5 of this Notice.*]

- Replacement Housing Payment. You may be eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including: (1) the monthly rent and cost of utility services for a comparable replacement unit, (2) the monthly rent and cost of utility services for your present unit, and (3) 30% of your average monthly gross household income. This payment is calculated on the difference between the old and new housing costs for a one-month period and multiplied by 42.

- [*PHA: list here any permanent relocation assistance offered, such as a Housing Choice Voucher.*]

- Listed below are three comparable replacement units that you may wish to consider for your replacement home. If you would like, we can arrange transportation for you to inspect these and other replacement units.

	Address	Rent & Utility Costs	Contact Info
1.			
2.			
3.			

We believe that the unit located at [*address*] is most representative of your original unit in the converting RAD project. The monthly rent and the estimated average monthly cost of utilities for this unit is [$ *amount*] and it will be used to calculate your maximum replacement housing payment. Please contact us immediately if you believe this unit is not comparable to your original unit. We can explain our basis for selecting this unit as most representative of your original unit and discuss your concerns.

Based on the information you have provided about your income and the rent and utilities you now pay, you may be eligible for a maximum replacement housing payment of approximately [$ (42 x monthly amount)], if you rent the unit identified above as the most comparable to your current home or rent another unit of equal cost.

Replacement housing payments are not adjusted to reflect future rent increases or changes in income. This is the maximum amount that you would be eligible to receive. If you rent a decent, safe and sanitary home where the monthly rent and average estimated utility costs are less than the comparable unit, your replacement housing payment will be based on the actual cost of that unit. All replacement housing payments must be paid in installments. Your payment will be paid in [#]__ installments.

You may choose to purchase (rather than rent) a decent, safe and sanitary replacement home. If you do, you would be eligible for a down-payment assistance payment which is equal to your maximum replacement housing payment, [$*amount*.] [*PHAs should note that, at the agency's discretion, a down-payment assistance payment that is less than $5,250 may be increased to any amount not to exceed $5,250. (See 49 CFR 24.402(c)(1)).*] Let us know if you are interested in purchasing a replacement home and we will help you locate such housing.

Please note that all replacement housing must be inspected in order to ensure it is decent, safe and sanitary before any replacement housing payments are made.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [*Name, Title, Address, Phone, Email Address*] before you make any moving plans. He/she will assist you with your move to a new home and help ensure that you preserve your eligibility for all relocation payments to which you may be entitled.

Remember, do not move or commit to the purchase or lease of a replacement home before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

_____
Print name:
Title:

Enclosure/s

NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)

Appendix 5: SAMPLE NOTICE OF ELIGIBILITY FOR URA RELOCATION ASSISTANCE (For residents who have been temporarily relocated for more than a year)

THIS IS A GUIDE FORM.
IT SHOULD BE REVISED TO REFLECT THE CIRCUMSTANCES.

PHA Letterhead

(date)

Dear [*Resident*]:

The property you formerly occupied at [*address*] is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program.
You have been temporarily relocated from that property since [*date*.] Your temporary relocation has exceeded one year.

It has been determined that you qualify as a "displaced person" according to the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). You are eligible for relocation assistance and payments under the URA.

You may choose to remain temporarily relocated and return to a unit in the RAD project once it is completed. It is currently estimated that you may return to the RAD project by [*date*]. If you choose to remain temporarily relocated, you will stay at your current location until the RAD project is completed.

Alternatively, you may choose permanent relocation assistance and payments for which you are eligible, as listed below. If you choose permanent relocation assistance, you give up your right to return to the completed RAD project. However, **<u>you do not need to move now</u>.** If you choose permanent relocation assistance instead of exercising your right to return to the completed RAD project, you will not be required to move sooner than 90 days from the date that at least one comparable replacement unit has been made available to you. [*Alternatively:* You will not be required to move sooner than 90 days from the date of this notice, which informs you of a comparable replacement unit that has been made available for you].

This is your Notice of Eligibility for relocation assistance.

The effective date of your eligibility is [*insert date that relocation exceeds one year*.]

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

Enclosed is a brochure entitled, "Relocation Assistance to Tenants Displaced From Their Homes." Please read the brochure carefully. It explains your rights and provides additional information on eligibility for relocation payments and what you must do in order to receive these payments.

The relocation assistance to which you are entitled includes:

- Relocation Advisory Services. You are entitled to receive current and continuing information on available comparable replacement units and other assistance to help you find another home and prepare to move.

- Payment for Moving Expenses. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 5 of this Notice.*] This is in addition to any amounts received to reimburse for any reasonable out-of-pocket expenses incurred in connection with the temporary move.

- Replacement Housing Payment. You may be eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including: (1) the monthly rent and cost of utility services for a comparable replacement unit, (2) the monthly rent and cost of utility services for your present home, and (3) for low-income persons, 30 percent of your average monthly gross household income. This payment is calculated on the difference between the old and new housing costs for a one-month period and multiplied by 42.

- [*PHA list here any other relocation assistance offered the resident, such as Housing Choice Voucher* .]

Listed below are three comparable replacement units that you may wish to consider for your replacement home. If you would like, we can arrange transportation for you to inspect these and other replacement units.

	Address	Rent & Utility Costs	Contact Info
1.			
2.			
3.			

We believe that the unit located at [*address*] is most representative of the original unit you occupied in the converting RAD project. The monthly rent and the estimated average monthly cost of utilities for this unit is $[*amount*] and it will be used to calculate your maximum replacement housing payment. Please contact us immediately if you believe this unit is not comparable to your original unit. We can explain our basis for selecting this unit as most representative of your original unit and discuss your concerns.

Based on the information you have provided about your income and the rent and utilities you now pay, you may be eligible for a maximum replacement housing payment of approximately $ [42 x $Amount], if you rent the unit identified above as the most comparable to your current home or rent another unit of equal cost.

Replacement housing payments are not adjusted to reflect future rent increases or changes in income. This is the maximum amount that you would be eligible to receive. If you rent a decent, safe and sanitary home where the monthly rent and average estimated utility costs are less than the comparable unit, your replacement housing payment will be based on the actual cost of that unit. All replacement housing payments must be paid in installments. Your payment will be paid in [#] installments.

Should you choose to purchase (rather than rent) a decent, safe and sanitary replacement home, you would be eligible for a downpayment assistance payment which is equal to your maximum replacement housing payment, [$ *amount*] [*PHAs should note that, at the agency's discretion, a downpayment assistance payment that is less than $5,250 may be increased to any amount not to exceed $5,250. (See 49 CFR 24.402(c)(1)).*] Let us know if you are interested in purchasing a replacement home and we will help you locate such housing.

Please note that all replacement housing must be inspected in order to ensure it is decent, safe, and sanitary before any replacement housing payments are made.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [Name, Title, Address, Phone, Email Address] before you make any moving plans. He/she will assist you with your move to a new home and help ensure that you preserve your eligibility for any applicable relocation payments.

Remember, do not move or commit to the purchase or lease of a replacement home before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

_____

Print Name:
Title:

Enclosure/s

NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)

RESOLUTION NO. 11831

RESOLUTION AUTHORIZING A SECOND AMENDMENT TO THE PHILADELPHIA HOUSING AUTHORITY MOVING TO WORK ("MTW") ANNUAL PLAN FOR MTW YEAR SIXTEEN

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") administers a Moving to Work ("MTW") Demonstration Program and a Rental Assistance Demonstration Program ("RAD"); and

WHEREAS, HUD regulations for the RAD program require that approval for the conversion of units to RAD be brought before the Board of Commissioners as an amendment to the Annual MTW Plan; and

WHEREAS, PHA has identified two hundred seventy-six (276) PHA-owned long-term vacant scattered sites from which to transfer operating and capital assistance to six (6) non-profit development partners, which partners will use that funding to develop two hundred seventy-six (276) units of affordable rental housing and then receive operating assistance under the RAD Section 8 Unit Based Voucher Program; and

WHEREAS, PHA has fulfilled the HUD requirement of providing opportunities for resident and public participation and comment on the Amended Annual Plan, including scheduling at least one (1) public hearing, by: 1) making available copies of the Amendment to the Plan to the public and to residents on January 18, 2016; 2) holding a public hearing on February 4, 2016; 4) posting the draft plan on PHA's website; 5) briefing the Resident Leadership at the monthly RAD meeting on January 27, 2016; and 6) having a public comment period from January 18, 2016 to February 17, 2016, and also has taken into consideration any comments received;

BE IT RESOLVED that the Board of Commissioners does hereby approve the Second Amendment to the MTW Year Sixteen Annual Plan, as distributed to the Board of Commissioners and referenced herein, and authorizes PHA's Chair and/or its President & CEO or his or her authorized designee(s) to take all steps necessary to finalize and secure HUD approval of and to implement the amendment.

I hereby certify that this was APPROVED BY THE BOARD ON 3/18/16

Barbara Coleman, General Counsel

ATTORNEY FOR PHA

NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD
PHILADELPHIA HOUSING AUTHORITY

The Philadelphia Housing Authority (PHA) is a participant in the Moving to Work Demonstration Program (MTW) pursuant to an Amended and Restated Moving to Work Agreement (MTW Agreement) with the U.S. Department of Housing and Urban Development (HUD). The MTW Agreement defines the terms and conditions under which PHA is a participant in the MTW Program and requires PHA to submit an MTW Annual Plan for HUD review and approval. PHA's MTW Annual Plan for Fiscal Year 2016 was originally submitted to HUD in January 2015, and approved by HUD in September 2015.

PHA is seeking public review and comments on a proposed amendment to the FY 2016 MTW Annual Plan concerning PHA's plans to convert certain public housing units to project-based assistance under the Rental Assistance Demonstration (RAD) program. The units consist of 272 vacant and uninhabitable scattered site public housing units. The proposed amendment provides information required by HUD concerning PHA's RAD conversion plans. The proposed amendment is incorporated in its entirety into the FY2016 MTW Annual Plan through an attachment entitled "Rental Assistance Demonstration Significant Amendment". It is available for public review and downloading on PHA's website at www.pha.phila.gov under the "Latest News" section or may be picked up at the following locations:

Public Housing Management Offices:
Bartram - 5404 Gibson Drive
Raymond Rosen- 2110 N. 23rd St.

Housing Choice Voucher Program Office:
2850 Germantown Ave 1st & 2nd Floor

Scattered Sites Management Offices:
Abbottsford Homes- 3226 McMichael St.
Westpark Apartments- 4445 Holden St.
Spring Garden Apartments - 715 Brandywine St.
Wilson Park- 2500 Jackson St.
Fairhill Apartments- 2411 N. 11th St.

PHA will conduct a Public Hearing on the proposed amendment. PHA residents, Housing Choice Voucher participants and the general public are invited to attend and provide comments at the Hearing and/or to submit written comments during the public comment period. The Public Hearing is scheduled for the following time and location:

Thursday, February 4, 2016 at 4:00 p.m.
12 South 23rd Street, 6th Floor
Philadelphia, PA 19103

The public comment period begins on January 18, 2016 at noon and ends February 17, 2016 at noon. All comments must be received at PHA's office by the end of the comment period. Please send written comments to:

Philadelphia Housing Authority
Office of Policy and Planning
Attention: MTW Plan Amendment Comment
12 South 23rd Street, Philadelphia, PA 19103

The Public Hearing is being held in an accessible location. If you require assistance, sign language interpreter or other accommodations, please call 215-684-5767. Please use the AT&T Relay Service for TTY.

PHA
PHILADELPHIA HOUSING AUTHORITY
OPENING DOORS TO OPPORTUNITIES

To: Philadelphia Housing Authority (PHA), Office of Policy, Research, & Enterprise Planning

From: Community Legal Services Housing Unit; Resident Advisory Board

Re: Comments on Proposed MTW Plan Amendment

Date: February 17, 2016

On January 18, 2016, according to Notice of MTW Public Hearing and Public Comment Period, Philadelphia Housing Authority (PHA) opened a public comment period, seeking public review and comments on a proposed amendment to the FY 2016 MTW Annual Plan concerning PHA's plans to convert 272 vacant, uninhabitable scattered site public housing units to project-based assistance under the Rental Assistance Demonstration (RAD) program. The proposed amendment provides additional information concerning PHA's RAD conversion plans. A public hearing was scheduled for February 4, 2016. The following comments[1] cover recommendations for ensuring that PHA's RAD conversions do not "adversely impact tenants" and that all residents living in converted properties "maintain their existing rights," as intended by Congress.[2]

1. **PHA identifies several conversion entities that will require rehabilitation, such as Lehigh Park I and II, Norris Square, and Haddington III. PHA should ensure that tenants are receiving clear language about their rights under RAD in lease agreements, relocation policies, and other policies and procedures as required by HUD.**

   Recommendations:

   - CLS and RAB strongly recommend that PHA allow us to review relocation plans for Conversion Households that will be relocated from units due to RAD conversion or rehabilitation related to a RAD conversion for non-PHA entities and allow us to provide substantive input on such plans.
   - CLS and RAB strongly recommend that PHA create a mechanism to ensure ongoing non-PHA entity compliance with tenant rights, public hearing, and notice requirements under RAD.
   - In addition to amending its Housing Choice Voucher Administrative Plan, CLS and RAB strongly recommend that tenant protections and rights be written into all HAP contracts, lease agreements, relocation policies, and other procedures to ensure enforceability by tenants. PHA should continue to model its lease agreements on the former public housing lease in spite of conversion to PBV, and should amend its HAP contracts with future owners to ensure that the owner will model its lease agreement on the former public housing lease as well, with RAD requirements incorporated into the lease.

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[1] Where noted, comments incorporate recommendations as part of the National Housing Law Project's Advocate's Guide: Securing Enforceable Tenant Protections in HUD's Rental Assistance Demonstration.

[2] S.Rpt. 112-83, 112th Cong., 1st Sess. (Sept. 21, 2011), at 108, quoted in NHLP, HUD Housing Programs: Tenant Rights, §12.2.3 n.236.

    - **Sample Language:** HAP Contract should read "to the extent that public housing due process and grievance rights (including informal conference and grievance hearings) exceed RAD statutory tenant protections, the more comprehensive provisions shall apply."
- PHA should also consider maintaining its existing transfer policies (including transfers for emergencies and domestic violence, sexual assault, dating violence, and stalking) to pre-empt any barriers to transfers that may develop from a change in site ownership. All rights should remain substantially equivalent to those available to public housing residents.
- PHA should also provide RAB leadership and CLS attorneys with all pertinent documents, such as copies of PHA's RAD application, resident lease agreements and relocation agreements, ground leases, proposed Management Agreement, and the RAD Commitment Contract, in advance and allow for the submission of comments and recommendations on these documents.
- CLS and RAB strongly recommend that PHA draft and enter into an MOU with developers, private owners, and resident councils to cover organizing rights, grievance rights, notice, comment, and public hearing rights to create consistent and clear rights across the entire portfolio of RAD conversions. The MOU should ensure that housing units transferred to affordable housing developments are operated in the same manner as PHA's current operation of federal public housing.

2. **PHA should clarify admissions and waitlist policies for future RAD sites, and should provide a plan for how it intends to notify applicants on the community-wide wait list about site-based waiting lists.** PHA indicates that it plans to post information on how to apply for the PBV site-based waiting list on the PHA website. While HUD Notice PIH-2012-32, REV. 2 states that PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list, we believe that simply posting information to the PHA website is inadequate notice and will not reach many or most of the applicants. Applicants on the public housing community-wide waiting list should be sufficiently informed about when and how to apply to RAD site-based waiting lists. CLS and RAB are also concerned about the timing of when these site-based waiting lists will be established.

   Recommendations:

   - CLS and RAB strongly recommend that PHA consider contacting every applicant on the public housing waiting list via a number of methods, including direct mailing, advertisement on radio and in newspapers, and other forms of outreach to ensure that the maximum number of applicants are informed of the site-based waitlists.
   - CLS and RAB strongly recommend that PHA create an implementation plan or provide sufficient details and methodology for the public housing waitlist and how it intends to notify current general/community-wide waitlist applicants of the site-based waiting lists. Notice must include when and how to apply to the site-based waiting lists.

- PHA should clarify admissions policies and rights for all RAD converted-properties. Admissions policies should be clear and consistent across all RAD sites and should be included in the suggested MOU.
- CLS and RAB strongly recommend that PHA adopt a process whereby applicants to RAD sites can request a review of denials, through informal meetings or grievance hearings.

3. **Concerns over ownership, control, and long-term funding of RAD conversions.** A shift in ownership and control of public housing "creates challenges for adequate oversight and jeopardizes access to information."[3] PHAs and private owners should fully share information, and file public reports on how RAD transactions are meeting program goals and standards. A transfer of assistance should not impair resident or public access to information. CLS and RAB are concerned about both the immediate and long-term impact of a lack of open meetings and non-transparent decision making by private owners.

   Recommendations:

   - CLS and RAB strongly recommend that PHA retain a long-term interest in RAD-converted properties by use of methods such as ground leases and other equivalent safeguards, which ensure direct control of operational performance and long-term affordability under RAD.
   - CLS and RAB are requesting that PHA make copies of all documents related to any RAD transaction available to tenants, advocates, and the public upon request.
   - CLS and RAB strongly suggest that PHA create a succession plan in the event of private sale or foreclosure, which needs to ensure that the properties continue subsidized and affordable housing for low-income tenants.

4. **PHA should provide adequate tenant education and ensure timely access to public information with reasonable opportunity to comment.** Ongoing education and communication with tenants as PHA moves through the conversion process is absolutely essential to the protection of tenant rights, and to ensure that tenants are able to provide informed input about any changes in the policies that stand to impact upon their rights as program participants or potential program participants. PHA must ensure that it complies with all related resident notification requirements as detailed in HUD Notice 2012-32 §1.8. Furthermore, although HUD requires PHA to provide tenants with a public review and comment period[4], a future change to private ownership may produce a loss in transparency and public information to tenants and tenant organizations.

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[3] NHLP Memorandum re RAD Concerns, April 10, 2015

[4] 24 CFR §§ 903.17(b); see NHLP, HUD Housing Programs: Tenant Rights, Sec. 7.5.1.7.1 (boards), 8.2 (planning).

Recommendations:

- We strongly suggest that PHA work with RAB and CLS advocates to create user-friendly tenant guides, brochures, fact sheets, and other self-help information in order to properly educate tenants on complicated changes to PHA policies.
- CLS and RAB strongly recommend that PHA put measures in place to ensure that notice requirements as provided by HUD are strictly followed and that meaningful opportunities for public comment are provided to tenants on minor and major changes that stand to impact their tenancy.

Thank you for your time and consideration. All responses and requests for more information in reference to these comments should be sent to:

Rasheedah Phillips, Esq.
Managing Attorney, LT Housing Unit
Community Legal Services of Philadelphia
(215) 981-3774
rphillips@clsphila.org

PHILADELPHIA HOUSING AUTHORITY
OPENING DOORS TO OPPORTUNITIES

12 SOUTH 23RD STREET
PHILADELPHIA, PA 19103
215.684.4327
PHA.PHILA.GOV

ERIK SOLIVAN, Esq.
Senior Vice President - Policy Research & Enterprise Planning

Erik.Solivan@pha.phila.gov

March 3, 2016

Rasheedah Phillips
Managing Attorney, Housing Unit
Community Legal Services
1424 Chestnut Street
Philadelphia PA, 19102

Asia Coney
President
Resident Advisory Board
5632 Walnut Street
Philadelphia PA, 19139

Dear Ms. Phillips and Ms. Coney:

The Philadelphia Housing Authority ("PHA") received your comments, dated February 17th, 2016 regarding proposed amendments to the Moving To Work Plan on the transfer of assistance from long-term vacant scattered sites under the Rental Assistance Demonstration ("RAD") Program to affordable housing units being development by six community based organizations. I am writing in response to your comments.

Recommendation 1: PHA will work with the administrator of the Lehigh Park 1 and 2 and the Norris Square Community Alliance, which are the two projects with occupied apartments, to ensure full compliance with the relocation provisions detailed in the RAD regulations, including all applicable tenant rights.

Recommendation 2: PHA's admission and waitlist policies for RAD sites are detailed in the Admissions and Continued Occupancy Policy ("ACOP") and Housing Choice Voucher Administration Plan ("Admin Plan"), as amended. PHA acknowledges this comment is substantially similar to comments received in response to the proposed amendments to the ACOP and Admin Plan, and a detailed response to those comments is forthcoming.

Recommendation 3: PHA will comply with the RAD regulations pertaining to the conversion of public housing units to the RAD Program regarding ownership and control. PHA, the Resident Advisory Board and Resident Leaders of developments planned for conversion to RAD, meet on a monthly basis to discuss all issues related to the conversion of public housing units to RAD. PHA acknowledges significant segments of this comment are substantially similar to comments received in response to the proposed amendments to the ACOP and Admin Plan pertaining to the RAD Program, and a detailed response to those comments is forthcoming.

Recommendation 4: PHA has and will continue to comply with the RAD regulations regarding tenant education and public information, and has established a monthly meeting with resident leaders from the developments planned for RAD conversion, and the Resident Advisory Board to discuss all matters related to the RAD program.

On behalf of PHA, I thank Community Legal Services and the Resident Advisory Board for the continuing dialogue on the RAD program. I encourage you to review the forthcoming responses to the comments submitted on the proposed amendments to the ACOP and Admin Plans.

If you have any questions about the responses detailed in the itemized table, please do not hesitate to reach out to me.

Regards,

Erik L. Soliván, Esquire
Senior Vice President

Certification of Consistency with the Consolidated Plan

U.S. Department of Housing and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan. (Type or clearly print the following information:)

Applicant Name: Philadelphia Housing Authority

Project Name: Moving to Work Annual Plan FY 2016 RAD Significant Amend #2

Location of the Project: The development and implementation of affordable housing and economic development initiatives in Phila., in accord with the City's ConPlan and AI. (2016 Consolidated Plan, adopted June, 2015)

Name of the Federal Program to which the applicant is applying: HUD - Moving to Work Demonstration

Name of Certifying Jurisdiction: City of Philadelphia, Office of Housing & Community Development

Certifying Official of the Jurisdiction Name: Melissa Long

Title: Deputy Director

Signature:

Date: 03/14/2016

Civil Rights Certification	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **Expires 4/30/2011**

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing.

Philadelphia Housing Authority	PA002
PHA Name	PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)	
Name of Authorized Official: Lynette Brown-Sow	Title: Chair, Board of Commissioners
Signature:	Date: 3-15-17