U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

MAY 1 0 2019

Mr. Kelvin Jeremiah
President & CEO
Philadelphia Housing Authority
2013 Ridge Ave
Philadelphia, PA 19121

Subject: Approval of PHA FY 2020 Annual Moving to Work Plan

Dear Mr. Jeremiah:

The Department of Housing and Urban Development has reviewed the Philadelphia Housing Authority's (PHA) FY 2020 Annual Moving to Work (MTW) Plan, which was initially submitted on January 14, 2019, and re-submitted per HUD's comments on April 15, 2019 and May 6, 2019. I am writing to inform you that PHA's FY 2020 Annual MTW Plan, as submitted on May 6, 2019, is approved.

The Department's approval of this Annual MTW Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act authorized by the MTW Agreement, including local, non-traditional activities in compliance with Notice PIH 2011-45. In providing assistance to families under programs covered by this Plan, PHA must comply with the rules, standards and policies established in the Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Agreement. Documents relying upon the approved Plan (i.e., Administrative Plan, Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved Plan and all required attachments and documents should be available for review and inspection at PHA's principal office during normal business hours.

Thank you for your continued efforts to implement an effective and meaningful MTW program. Please contact Pravin Krishnan, your MTW Coordinator, at (202) 402-3965 if you have any questions.

Sincerely,

Marianne Nazzaro
Moving to Work Program Director
Office of Public Housing Investments

cc:
Monica Hawkins, Philadelphia Field Office

PHILADELPHIA HOUSING AUTHORITY

MOVING TO WORK ANNUAL PLAN
FISCAL YEAR 2020
(APRIL 1, 2019 TO MARCH 31, 2020)

FIRST SUBMISSION TO HUD: JANUARY 14, 2019
SECOND SUBMISSION TO HUD: APRIL 15, 2019
THIRD SUBMISSION TO HUD: MAY 6, 2019

PHILADELPHIA HOUSING AUTHORITY
MOVING TO WORK ANNUAL PLAN – FISCAL YEAR 2020

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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 2020, i.e. the period from **April 1, 2019 to March 31, 2020**.

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 the MTW program along with the requirements for participation. PHA's MTW Agreement with HUD extends through 2028.

MTW is a demonstration program authorized by Congress, through which PHA and other participating agencies have 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.

The FY 2020 Annual Plan incorporates HUD's current reporting requirements as detailed in the recently revised HUD Form 50900. Over the course of PHA's participation in the MTW program, the Annual Plan elements have been restructured and modified as needed to comply with HUD's evolving program requirements.

MTW Long-Term Goals and Objectives

PHA established five (5) broad objectives in its first MTW Annual Plan:

- 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 as described in the Strategic Directions Plan initially discussed in the FY 2015 Annual Plan. 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. The following are the twelve priorities identified in the Strategic Directions Plan, which continue to provide a framework for PHA's activities and resource allocation in FY 2020 and beyond:

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

In 2016, PHA and the City of Philadelphia collaborated on the development of an Assessment of Fair Housing (AFH) Plan in compliance with the December 2015 Affirmatively Further Fair Housing Final Rule. This extensive planning process involved PHA residents and a wide range of community stakeholders. The AFH Plan, which was accepted by HUD in February 2017, calls for a balanced approach to fair housing planning, one that encompasses: preservation of existing affordable housing resources; development of new affordable housing throughout the City including in low poverty areas; investments in distressed areas to remove barriers and expand opportunities related to education, job creation and transportation; expansion of PHA's HCV Mobility program to support movement of voucher holders to high opportunity areas in Philadelphia and beyond the city boundaries; enhancements to ongoing fair housing outreach, education and enforcement efforts; implementation of an ongoing local and regional dialogue and planning on fair housing issues; and, ongoing efforts to ensure that all citizens have open and fair access to information on housing programs and services. The AFH goals and strategies are reflected in PHA's FY 2020 MTW Annual Plan, and will help inform PHA's long-term MTW goals and objectives.

In FY 2020 and beyond, PHA plans to continue to substantially transform its properties and programs, and to support the revitalization of Philadelphia's neighborhoods, by leveraging its funding and utilizing flexibility provided by the MTW Agreement in virtually every area of agency operations including conversions of public housing to project-based assistance under the Rental Assistance Demonstration program.

Efforts to preserve PHA's housing portfolio are increasingly important and challenging in light of the continued underfunding of the Public Housing Operating Subsidy and Capital Fund budgets, and the scarcity of major capital grant funds. After decades of inadequate federal funding, PHA has a backlog of over $1 billion in deferred capital needs. As public housing properties age, the capital needs backlog grows every year. In tandem, the cost of operating PHA's aging physical plants is increasing. In the last six (6) years alone, PHA has lost over $95 million due to national prorations to the Public Housing Operating Fund. Thus, efforts to reduce operating costs, including identifying more efficient and cost-effective service delivery methods, will continue to be a major priority for PHA in the coming months and years.

FY 2020 MTW Goals and Objectives

PHA will implement a coordinated, comprehensive program of capital improvements, housing and neighborhood development activities, maintenance and management initiatives, and resident supportive services in FY 2020. As PHA's funding for FY 2020 is unknown as of the publication date of the MTW Annual Plan, 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*** – The "6 in 5" initiative encompasses an array of initiatives to develop, acquire or preserve affordable housing in the City of Philadelphia including PHA's Unit Based Leasing and Development Program, Rental Assistance Demonstration (RAD) Program conversions and transfer of assistance developments, and the Partnership Initiative. It 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 (LIHTC) properties; and partnerships with the City, non-profit agencies and local developers on new construction, acquisition and substantial rehabilitation projects. For FY 2020, PHA will work with development partners on seven new public housing developments, with a total of 262 units. A total of $102 million in other funds will be leveraged by these projects. Under the MTW Unit Based Leasing and Development Program (UBV), PHA plans to enter into long-term subsidy contracts for an additional 1,387 units in FY 2020, a figure that includes planned RAD conversions and other development initiatives. PHA leverages MTW Block Grant and other non-MTW funding to support many of these development projects. In addition to utilizing MTW Block Grant funding, PHA incorporates MTW flexibility in admissions, continued occupancy and other areas.

- ***Neighborhood Transformation at Blumberg/Sharswood*** – PHA will continue to implement the Blumberg/Sharswood Choice Neighborhoods Transformation Plan in FY 2020. The Plan involves construction or rehabilitation of 1200 affordable and market-rate units, including 420 homeownership units and replacement housing for the distressed Blumberg Apartments public housing development; revitalization of commercial corridors including construction of a new neighborhood supermarket; a newly constructed PHA headquarters building; creation of new recreational facilities and green space; and, the establishment of a multipurpose neighborhood health and service center and high performing high school. Major activities that are already complete or substantially underway include: 1) All Blumberg residents have been relocated, and the site (except for the Senior Tower) has been demolished; 2) PHA has completed acquisition of 1300 vacant and/or blighted parcels in the neighborhood to pave the way for planned development; 3) Construction and reoccupancy of 57 replacement housing units at on- and off-site locations has been completed; 4) The Blumberg streetscape and infrastructure has been redesigned and is under construction, with completion scheduled for FY 2019; 5) Rehab of the Blumberg Senior Tower, which includes 94 replacement units converted to PBV under the Rental Assistance Demonstration program, is underway and reoccupancy will occur in FY 2019; 6) A new and innovative neighborhood high school operated by Big Picture Schools has now opened in the once shuttered Vaux School; 7) Temple College of Public Health has signed a lease to open a new nurse-managed health clinic in the Vaux, now reborn as the Vaux Community Building; 8) HUD has designated PHA as an EnVision Center, which will be based out of the Vaux Community Building, and will soon provide critically needed employment, entrepreneurship, youth development and other community services; and, 9) Construction of PHA's new Ridge Avenue headquarters building has commenced, with occupancy scheduled for late 2018. In FY 2020, PHA projects that construction will be completed on an additional 83-unit, on-site rental phase, and that construction will start on two partner developments (Harlan Street and Reynolds School). Habitat for Humanity is also projected to make substantial progress towards completion of 20 affordable homeownership units. PHA will also continue to support after school and supportive service programming for low-income

youth attending the new Big Picture Philadelphia High School in the Vaux Community Building.

- ***Norris Homes/North Central Philadelphia Neighborhood Transformation*** **–** PHA will continue to work in partnership with the City of Philadelphia, public housing residents and other partners in FY 2020 to implement a Choice Neighborhood Transformation Plan in the North Central Philadelphia neighborhood that will result in extensive community improvements and construction of 267 rental and 30 homeownership units, of which 147 will be replacement housing. The first rental phase of 89 units will be completed in FY 2019. The groundbreaking for a second rental phase of 50 units took place in September 2018, with construction scheduled for completion in FY 2020. A third rental phase of 128 mixed income rental units is also projected to commence construction in FY 2020.

- ***Rental Assistance Demonstration (RAD)*** **–** In FY 2020, PHA will continue its efforts to preserve existing public housing developments, reposition the scattered site portfolio and expand housing opportunities through the Rental Assistance Demonstration (RAD) program. PHA utilizes its MTW Block Grant and MTW programmatic flexibility to support RAD conversions. This includes transferring subsidies through the RAD "transfer of assistance" provision from vacant, non-viable scattered sites to new projects developed throughout the City by PHA and other development partners. Overall, PHA projects that 1,433 units at both existing public housing sites and new transfer of assistance sites will have closed under the RAD program by the end of FY 2019. PHA plans to convert an additional 1,005 public housing units (including scattered site units that are currently vacant and uninhabitable) to project-based assistance through RAD in FY 2020.

- ***Workforce Development, Youth Development, EnVision Center*** – Youth development, adult education, employment and training, financial literacy and nutritional services are among the supportive service programs that will continue to be provided by PHA and a network of partners in FY 2020. PHA and partners will launch a new PHA Workforce Development Program at the Vaux Community Building that will be integrated with the new EnVision Center and offer a "one stop shop" for job readiness, job training and placement, and other related services. Additionally, PHA plans to continue its Summer Jobs Program which provides six weeks of employment for youth. PHA will also provide scholarships, afterschool, summer camp, and preschool programming for PHA's young residents. PHA plans to continue its Smoke Free Housing program. These initiatives all leverage MTW Block Grant funding to secure additional public and private funding. A critical ongoing objective is for PHA to maximize and leverage its MTW Block Grant investments through innovative partnerships with State, City, and non-profit agencies, universities, and social services organizations. A summary of PHA's MTW and Non-MTW funded resident services programs is included in the Annual Plan.

- ***HCV Mobility Program*** – The overall goal of PHA's Mobility Program 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. PHA will continue implementation of the Housing Opportunity Program in FY 2020. HUD funded the initial pilot program; however, due to its successes, PHA elected to use MTW funding to

continue it indefinitely. Participants are provided with a broad range of supportive services, housing counseling, and other efforts to promote the successful transition to higher opportunity areas.

- ***Second Chance Initiative*** – PHA will continue to implement a 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. The program also involves a partnership with the Pennsylvania First Judicial Court returning citizen programs for public housing households.

- ***Nursing Home Transition*** – The Nursing Home Transition Program provides critically-needed housing opportunities for persons with disabilities who are transitioning from nursing home to community-based settings. In FY 2020, PHA will continue to work with the City and State to provide affordable housing opportunities for people with disabilities.

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

PHA will periodically review and revise ongoing initiatives as needed in response to current conditions and priorities and to take advantage of new/emerging opportunities.

Background on the MTW Annual Plan

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, objectives and activities, and to offer feedback. PHA conducted a meeting with resident leadership 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 and obtained Board of Commissioners approval prior to submission of the Plan to HUD. See Section VI and Appendix A for additional information.

II. GENERAL OPERATING INFORMATION

A. Housing Stock Information

i. Planned New Public Housing Units

PHA plans to add 262 new public housing units to its inventory in FY 2020 as summarized in Table 1. PHA competitively selected the developments to receive public housing operating subsidy through a Request for Proposals (RFP) under PHA's Unit Based Development and Leasing (UBV) program. All planned public housing developments will be undertaken by third party developer partners. The actual number of new public housing units may vary depending on several variables including changes to financing plans and construction schedules, receipt of Low Income Housing Tax Credits, HUD processing timetables and other factors. PHA will continue to comply with all applicable environmental requirements, and coordinate environmental review activities with the HUD Field Office for these developments. PHA may issue a new RFP during FY 2020, and may select additional developments for receipt of operating subsidy as a result of the RFP, subject to approval of the PHA Board of Commissioners.

Table 1: Planned New Public Housing Units in FY 2020

AMP Name/#	Bedroom Size						Total Units**	Population Type	# of UFAS Units	
	0/1	2	3	4	5	6 +			Fully Accessible	Adaptable
Francis House	50						50	General	50	
HACE: Casa Indiana	50						50	Elderly	6	44
Liberty52: Stephen Gold Community Residences	24						24	Elderly/ Disabled	6	18
Project Home: Maguire Residence	27						27	General	6	3
Womens Community Revitalization Project: Nicole Hines Townhomes		11	10	2			23	General/ Disabled	3	
Dauphin House	52						52	Elderly	9	
New Courtland at Henry Avenue Phase 1B	36						36	Elderly	8	28
Total Public Housing Units to be Added in Plan Year							**262**			

**AMP numbers have not yet been assigned.*
***Refers to total public housing units. Actual total unit count may vary and include other types of units including market, Project Based Voucher, etc.*

ii. Planned Public Housing Units to Be Removed from Inventory

In FY 2020, PHA plans to demolish and/or dispose of a projected 2,152 units as summarized in Table 2, the majority of which are vacant, non-viable scattered site units. The planned demolition and disposition initiatives are related to PHA's revitalization program and ongoing portfolio assessment and repositioning efforts including conversion of public housing units to project-based assistance under the Rental Assistance Demonstration (RAD) program. 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 timetables for HUD and City of Philadelphia approvals, project financing, RAD closings and other factors.

Table 2: Planned Public Housing Units to Be Removed in FY 2020*

AMP #	Development Name	# of Units to be Removed	Explanation for Removal
PA2-014	Norris Apartments Phase V	45	Choice Neighborhood RAD conversion
PA2-015	Harrison Plaza	112	Conversion of tower in existing public housing development
PA2-039	West Park Apartments	327	Conversion of existing public housing development
PA2-093	Westpark Plaza	65	Conversion of existing public housing development
PA2-132	Suffolk Manor	137	Conversion of existing PAPMC public housing development
PA2-137	Cambridge I	44	Conversion of existing PAPMC public housing development
PA2-901	Scattered Sites Haddington	13	RAD Transfer of Assistance
		4	Disposition of Scattered Properties
PA2-902	Scattered Sites Mantua	27	RAD Transfer of Assistance
		55	Disposition of Scattered Properties
PA2-903	Scattered Sites Kingsessing	17	RAD Transfer of Assistance
		17	Disposition of Scattered Properties
PA2-904	Scattered Sites Germantown	0	RAD Transfer of Assistance
		24	Disposition of Scattered Properties
PA2-905	Scattered Sites Fairhill Square	35	RAD Transfer of Assistance
		266	Disposition of Scattered Properties
PA2-906	Scattered Sites Francisville	0	RAD Transfer of Assistance
		139	Disposition of Scattered Properties
PA2-907	Scattered Sites Ludlow	0	RAD Transfer of Assistance
		197	Disposition of Scattered Properties
PA2-908	Scattered Sites Susquehanna	54	RAD Transfer of Assistance
		107	Disposition of Scattered Properties
PA2-909	Scattered Sites Strawberry Mansion	34	RAD Transfer of Assistance
		222	Disposition of Scattered Properties
PA2-910	Scattered Sites Oxford Jefferson	25	RAD Transfer of Assistance
		186	Disposition of Scattered Properties
		2,152	**Total Public Housing Units to Be Removed in Plan Year**

**Timing for removal of units related to RAD conversions may vary and extend beyond the Fiscal Year. Addresses for scattered site units planned for demo/dispo have been included in Appendix E to this Plan.*

PHA has submitted applications to HUD to dispose of three (3) administrative building properties that are in excess of its needs due to the construction of the Agency's consolidated headquarters:

- 1800 S. 32nd Street (currently under HUD review)

- 1606 Swain Avenue (approved by HUD)
- 712 N. 16th Street (approved by HUD

PHA intends to proceed with the dispositions of the above-listed buildings in FY 2020. Also in FY 2020, PHA plans to submit applications to HUD for disposition of three additional administrative buildings:

- 3440 Bartram Avenue
- 3100 Penrose Ferry Rd
- 1201-07 West Somerset Avenue

PHA will sell or lease the administrative properties at fair market value based on an assessment of which option will generate the greatest benefit to PHA. PHA believes that the dispositions are in the best interest of PHA, its residents, and the City of Philadelphia.

iii. Planned New Project-Based Voucher Leasing

PHA also provides project-based voucher subsidies to non-profit sponsors and other private property owners through its UBV program. Table 3 provides details on new UBV developments that PHA plans to subsidize with vouchers during the Plan Year. This includes RAD conversion developments that PHA projects to be newly placed under contract in FY 2020. Overall, PHA projects that 1,387 additional units will be placed under contract in FY 2020. PHA may issue a new Request for Proposals (RFP) during FY 2020, and may select additional developments for receipt of unit-based vouchers as a result of the RFP, subject to approval of the PHA Board of Commissioners. Actual contract/leasing figures may vary based on multiple factors, including contract terminations or suspensions, new and additional projects approved by the PHA Board during the Plan year, HUD RAD processing timetables and other considerations.

Table 3: New Housing Choice Vouchers to be Project-Based in FY 2020

Property Name	# of Vouchers to be Project-Based	RAD?	Description of Project
Harlan Street	22	Yes	New construction in the Sharswood neighborhood sponsored by Michaels Development.
Susquehanna Housing	78	Yes	New construction in Strawberry Mansion at 27th & Susquehanna for low-income families sponsored by Susquehanna Net Zero Housing LP.
Susquehanna Square	37	Yes	New construction sponsored by Community Ventures.
West Park Plaza	65	Yes	Rehabilitation of existing public housing sponsored by PHA. Supportive services are provided.
Blumberg 83	83	Yes	New construction in Blumberg/Sharswood neighborhood serving low-income families sponsored by PHA.
CNI Norris/North Central Phase III	28	Yes	New construction replacement of existing family public housing site sponsored by PHA.
Francis House	10	No	New construction for seniors in Northeast Philadelphia sponsored by St Ignatius. Supportive services are provided.

Property Name	# of Vouchers to be Project-Based	RAD?	Description of Project
Liddonfield	300	No	New construction for seniors in Northeast Philadelphia sponsored by New Courtland. Supportive services are provided.
Reynolds School	49	Yes	Adaptive reuse that will convert existing elementary school into housing for homeless veterans sponsored by HELP USA. Supportive services are provided.
Norris Apartments Phase V	45	Yes	Choice Neighborhood RAD conversion sponsored by PHA.
Harrison Plaza	112	Yes	Conversion of tower in existing public housing development sponsored by PHA.
West Park Apartments	327	Yes	Conversion of existing public housing development sponsored by PHA.
Suffolk Manor	137	Yes	Conversion of existing PAPMC public housing development sponsored by PHA.
Cambridge I	44	Yes	Conversion of existing PAPMC public housing development sponsored by PHA.
Beury Building	50	Yes	Rehabilitation site in North Philadelphia for elderly/disabled individuals sponsored by North Philly Works Inc.
	1,387	**Planned Total Vouchers to be Newly Project-Based**	

iv. Planned Existing Project Based Vouchers

In addition to planned new project-based vouchers, PHA will continue to provide voucher-based operating support for a large portfolio of existing units under contract in the UBV program. Table 4 provides details on those UBV developments that are currently under contract, and that PHA projects will be under contract throughout FY 2020. As noted, there are 3,517 units in this category.

Table 4: Planned Existing Project-Based Vouchers in FY 2020

Property Name	# of Project-Based Vouchers	Planned Status at End of Year	RAD?	Description of Project
46th St	4	Leased/Issued	No	Existing site for low-income families in South Philadelphia sponsored by Columbus Property Management. Supportive services provided.
5317 15th St	1	Leased/Issued	No	Existing site for low-income families in South Philadelphia sponsored by Columbus Property Management. Supportive services provided.
7th & Ritner	5	Leased/Issued	No	Existing site for low-income families in South Philadelphia sponsored by Columbus Property Management. Supportive services provided.
Academy Rd	18	Leased/Issued	No	Existing site for low-income families in Roxborough section of Philadelphia sponsored by Columbus Property Management. Supportive services provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of Year	RAD?	Description of Project
Bernice Elza	6	Leased/Issued	No	Existing site for homeless families with disability in West Philadelphia sponsored by Peoples Emergency Center. Supportive services provided.
Ditman St	10	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Columbus Property Management. Supportive services provided.
Fattah Homes I	6	Leased/Issued	No	Existing site for homeless families with disability in West Philadelphia sponsored by Peoples Emergency Center. Supportive services provided.
INB Mascher	12	Leased/Issued	No	Existing site for women and their families in North Philadelphia sponsored by Women's Community Revitalization Project. Supportive services provided.
Jannie's Place I	6	Leased/Issued	No	Existing site for homeless individuals in West Philadelphia sponsored by Peoples Emergency Center. Supportive services provided.
Kendrick/ Gillespie St	11	Leased/Issued	No	Existing site for low-income families in Holmesburg section of Philadelphia sponsored by Columbus Property Management. Supportive services provided.
Larchwood St	4	Leased/Issued	No	Existing site for low-income families in Spruce Hill section of Philadelphia sponsored by Columbus Property Management. Supportive services provided.
Martin St	7	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Columbus Property Management. Supportive services provided.
Osage Ave	2	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Columbus Property Management. Supportive services provided.
Rhawn St	11	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Columbus Property Management. Supportive services provided.
Spruce St	3	Leased/Issued	No	Existing site for low-income families in South Philadelphia sponsored by Columbus Property Management. Supportive services provided.
Thompson St	20	Leased/Issued	No	Existing site for very low-income families in Center City and West Philadelphia sponsored by Columbus Property Management. Supportive services provided.
Tillmon Villanueva	38	Leased/Issued	No	Existing site for women and their families in North Philadelphia sponsored by Women's Community Revitalization Project. Supportive services provided.
4050 Apts	20	Leased/Issued	No	New Construction site for Starving Artists in West Philadelphia sponsored by People's Emergency Center. Supportive services provided.
4th & Diamond	32	Leased/Issued	No	Existing site for women and their families in North Philadelphia sponsored by Women's Community Revitalization Project. Supportive services provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of Year	RAD?	Description of Project
810 Arch St	70	Leased/Issued	No	Existing site for Homelessness in Center City Philadelphia sponsored by Project Home. Supportive services provided.
Anna's House	12	Leased/Issued	No	Existing site for homeless/mental health individuals in South Philadelphia sponsored by CATCH. Supportive services provided.
Arch V Temple	49	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Columbus Property Management.
Arch VI Temple	40	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Columbus Property Management.
Arch VII LIH Walnut	14	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Columbus Property Management. Supportive services provided.
Art Apartments	30	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Pine Lake Management Associates, LP.
Ascension Manor	3	Leased/Issued	No	Existing site for low-income seniors in North Philadelphia sponsored by Liberty Resources. Supportive services provided.
Belmont I	25	Leased/Issued	No	New Construction site for the disabled in West Philadelphia sponsored by Inglis House. Supportive services provided.
Belmont II	15	Leased/Issued	No	New Construction site for the disabled in West Philadelphia sponsored by Inglis House. Supportive services provided.
Benner/Frankford	8	Leased/Issued	No	Existing site for low-income families in South Philadelphia sponsored by Columbus Property Management. Supportive services provided.
Bethesda Project Bainbridge	20	Leased/Issued	No	Existing site for homeless/mental health individuals in South Philadelphia sponsored by Bethesda Project. Supportive services provided.
Bethesda Project South	4	Leased/Issued	No	Existing site for homeless/mental health individuals in South Philadelphia sponsored by Bethesda Project. Supportive services provided.
Bethesda Project Spruce	13	Leased/Issued	No	Existing site for homeless/mental health individuals in South Philadelphia sponsored by Bethesda Project. Supportive services provided.
Bigham Place	7	Leased/Issued	No	Existing site for Homeless families in Mantua sponsored by People's Emergency Center. Supportive services provided.
Blakiston St	7	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Columbus Property Management.
Blumberg	6	Leased/Issued	No	New Construction for low-income families in North Phila sponsored by Philadelphia Housing Authority.
Boriquen	17	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Boriquen Associates II Limited. Supportive services provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of Year	RAD?	Description of Project
Brentwood Parkside	22	Leased/Issued	No	Existing site for very low-income seniors and families in West Philadelphia sponsored by Columbus Management Company. Supportive services provided.
Centennial Village	23	Leased/Issued	No	New Construction for low-income families, seniors, disabled in West Philadelphia sponsored by Community Ventures. Supportive services provided.
Chatham Court Apts	18	Leased/Issued	No	Existing site for low-income families in West Philadelphia sponsored by Chatham Apts Assoc. LP. Supportive services provided.
Chestnut St	6	Leased/Issued	No	Existing site for low-income families in the West Philadelphia sponsored by Columbus Property Management.
Cloisters III	18	Leased/Issued	No	Existing site for homeless individuals in West Philadelphia sponsored by Cloisters III Housing Partnership. Supportive serviced provided.
Conklin St	3	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Columbus Property Management.
Dignity Boss	8	Leased/Issued	No	Existing site for women of domestic abuse with children in Germantown/Mt Airy sponsored by Community For Dignity & Fairness. Supportive services provided.
Dignity Nedro	4	Leased/Issued	No	Existing site for women of domestic abuse with children in Northwest Philadelphia sponsored by Community For Dignity & Fairness. Supportive services provided.
Dignity-1	10	Leased/Issued	No	Existing site for women of domestic abuse with children in Germantown, sponsored by Community For Dignity & Fairness Supportive services provided.
Dignity-15	4	Leased/Issued	No	Existing site for women of domestic abuse with children in Germantown, sponsored by Community For Dignity & Fairness. Supportive services provided.
Dignity-21	11	Leased/Issued	No	Existing site for women of domestic abuse with children in Germantown, sponsored by Community For Dignity & Fairness. Supportive services provided.
Dignity-33	16	Leased/Issued	No	Existing site for women of domestic abuse with children in Germantown, sponsored by Community For Dignity & Fairness. Supportive services provided.
Dignity-4	3	Leased/Issued	No	Existing site for women of domestic abuse with children in Germantown, sponsored by Community For Dignity & Fairness. Supportive services provided.
Dunlap School	35	Leased/Issued	No	Existing site for seniors in North Philadelphia sponsored by Dunlap Management Partners LP. Supportive services provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of Year	RAD?	Description of Project
Edgewood Manor	33	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Edgewood Manor II Lap. Supportive services provided.
Elders Place I	43	Leased/Issued	No	Existing senior site in the Germantown section of Philadelphia sponsored by Penn Housing LLC. Supportive services provided.
Elders Place II	38	Leased/Issued	No	Existing senior site in the Germantown section of Philadelphia sponsored by Penn Housing LLC. Supportive services provided.
Fattah Homes II	6	Leased/Issued	No	Existing site for Homeless families in Mantua sponsored by People's Emergency Center. Supportive services provided.
Freedom Village	16	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Freedom Village LP.
Gaudenzia Shelton Court	19	Leased/Issued	No	Existing site for homeless low-income individuals in East Mt Airy, sponsored by Gaudenzia Foundation Inc. Supportive services provided.
Gordon St	21	Leased/Issued	No	New construction for low-income families sponsored by Philadelphia Housing Authority.
Help I	14	Leased/Issued	No	Existing site for veterans in West Philadelphia sponsored by HELP USA. Supportive services provided.
Help II	50	Leased/Issued	No	Existing site for veterans in West Philadelphia sponsored by HELP USA. Supportive services provided.
HELP IV	15	Leased/Issued	No	Existing site for veterans in West Philadelphia sponsored by HELP USA. Supportive services provided.
Hope Bridge Ogden	4	Leased/Issued	No	Existing site for homeless individuals in West Philadelphia sponsored by Methodist Family Services of Philadelphia. Supportive services provided.
Hope Bridge Vine St	20	Leased/Issued	No	Existing site for homeless individuals in West Philadelphia sponsored by Methodist Family Services of Philadelphia. Supportive services provided.
Imani Homes I	24	Leased/Issued	No	Existing site for homeless families in West Philadelphia sponsored by Methodist Family Services of Philadelphia. Supportive services provided.
Imani Homes II	6	Leased/Issued	No	Existing site for homeless individuals in West Philadelphia sponsored by Methodist Family Services of Philadelphia. Supportive services provided.
Imani Homes III	6	Leased/Issued	No	Existing site for homeless individuals in West Philadelphia sponsored by Methodist Family Services of Philadelphia. Supportive services provided.
Imani Homes IV	8	Leased/Issued	No	Existing site for homeless individuals in West Philadelphia sponsored by Methodist Family

Property Name	# of Project-Based Vouchers	Planned Status at End of Year	RAD?	Description of Project
				Services of Philadelphia. Supportive services provided.
Imani Homes V	11	Leased/Issued	No	Existing site for homeless individuals in West Philadelphia sponsored by Methodist Family Services of Philadelphia. Supportive services provided.
Impact Veterans	8	Leased/Issued	No	Existing site for Veteran Families in North Philadelphia sponsored by Impact Services. Supportive services provided.
Inglis House	17	Leased/Issued	No	Existing site for the disabled sponsored by Inglis House. Supportive services provided.
Inglis House-Elmwood	40	Leased/Issued	No	Existing site for the disabled sponsored by Inglis House. Supportive services provided.
Jackson St	2	Leased/Issued	No	Existing site for low-income families in the West Philadelphia sponsored by Columbus Property Management.
Jannie's Place	11	Leased/Issued	No	Existing site for Homeless families in Mantua sponsored by People's Emergency Center. Supportive services provided.
JBJ Homes	15	Leased/Issued	No	Existing site for homeless with special needs in the Fairmount are of Philadelphia sponsored by Project Home. Supportive services provided.
Kate's Place	35	Leased/Issued	No	Existing site for singles and people with disabilities in the Center City area of Philadelphia sponsored by Peoples Emergency Center. Supportive services provided.
Keystone St	6	Leased/Issued	No	Existing site for families in Northeast Philadelphia sponsored by Columbus Property Management.
Lehigh Park Apts	25	Leased/Issued	No	Existing site for families, elderly or disabled sponsored by HACE. Supportive services provided.
Liberty at Disston	5	Leased/Issued	No	Nursing home transition in Northeast Philadelphia sponsored by Liberty Resources. Supportive services provided.
Liberty Resource	2	Leased/Issued	No	Existing site with a preference for disabled seniors in West Philadelphia sponsored by Liberty Resources.
Liberty Welsh	2	Leased/Issued	No	Nursing home transition in Northeast Philadelphia sponsored by Liberty Resources.
Lindley Court	11	Leased/Issued	No	Rehabilitation site in Logan for seniors sponsored by Presby Inspired Life. Supportive services provided.
Los Balcones	21	Leased/Issued	No	Existing site for low-income women and families in North Philadelphia sponsored by Norris Square Association.
Monument Mews	60	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Columbus Property Management.
Monument Rd	11	Leased/Issued	No	Existing site for single women in West Philadelphia sponsored by Methodist Homes. Supportive services provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of Year	RAD?	Description of Project
Morton St	2	Leased/Issued	No	Existing site for low-income families in Germantown Philadelphia sponsored by Columbus Property Management.
Mt Vernon II	15	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Mt Vernon LP.
Mt. Vernon I	15	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Mt Vernon LP.
New Courtland at Allegheny	40	Leased/Issued	No	Existing site for low-income seniors in North Philadelphia sponsored by New Courtland. Supportive services provided.
New Courtland at Cliveden	32	Leased/Issued	No	Existing site for low-income seniors in Germantown sponsored by New Courtland. Supportive services provided.
NPCH - Community Building	16	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by NPCH Associates.
Oakdale St	12	Leased/Issued	No	New construction site for low-income families sponsored by Philadelphia Housing Authority.
Parkside 10	41	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Columbus Property Management.
Parkside 11	8	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Columbus Property Management.
Paseo Verde	19	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Transit Village Affordable Housing LP.
Patriot House	15	Leased/Issued	No	Existing site for homeless individuals in South Philadelphia sponsored by CATCH. Supportive services provided.
Penrose	10	Leased/Issued	No	Existing site for homeless individuals in South Philadelphia sponsored by CATCH. Supportive services provided.
Powelton Heights	30	Leased/Issued	No	Existing site for seniors in West Philadelphia sponsored by Columbus Property Management.
Preston St	7	Leased/Issued	No	Existing site for low-income families in the West Philadelphia sponsored by Columbus Property Management.
Ray's Place	17	Leased/Issued	No	Existing site for homeless persons with a serious mental illness in North Philadelphia sponsored by Project Home. Supportive services provided.
Reed St	8	Leased/Issued	No	Existing site for low-income families in South Philadelphia sponsored by Columbus Property Management.
Regent Terrace	80	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Regent Terrace Housing Partnership.
Sandy's/Catherine House	3	Leased/Issued	No	Existing site for homeless individuals in South Philadelphia sponsored by CATCH. Supportive services provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of Year	RAD?	Description of Project
Sarah Allen IV	2	Leased/Issued	No	Existing site for low-income families in West Philadelphia sponsored by Sarah Allen Community Homes LP.
Sarah Allen Part	1	Leased/Issued	No	Existing site for low-income families in West Philadelphia sponsored by Sarah Allen Community Homes LP. Supportive services are not provided
Sarah Allen V	3	Leased/Issued	No	Existing site for low-income families in West Philadelphia sponsored by Sarah Allen Community Homes LP.
Sartain School	35	Leased/Issued	No	Existing site for seniors in North Philadelphia sponsored by Sartain School Venture. Supportive services are not provided
Sedgley Apartments	16	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by MPB School Apartments LP.
Sheff/Wingate St	8	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Columbus Property Management.
Sheila D Brown Women's Center	9	Leased/Issued	No	Existing site for women with behavioral disabilities in South Philadelphia sponsored by Columbus Property Management.
SIL Program	13	Leased/Issued	No	Existing site for individuals with mental health/chemical dependency in Roxborough. Supportive services provided.
South 55th St LP	18	Leased/Issued	No	Existing site for diverse tenants in West Philadelphia sponsored by South 55th St LP.
South Phila Scattered	19	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Columbus Property Management.
Spring Garden	9	Leased/Issued	No	Existing site for homeless families with disability in West Philadelphia sponsored by Peoples Emergency Center. Supportive services provided.
Susquehanna Apt	47	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Susquehanna Apts LP.
Tioga Family Center	24	Leased/Issued	No	Existing site for homeless low-income individuals in East Mt Airy sponsored by Gaudenzia Foundation Inc. Supportive services provided.
Tioga Gardens	17	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Tioga Gardens Associates.
Walnut Park Plaza	224	Leased/Issued	No	Exiting site for low-income seniors in West Philadelphia sponsored by Walnut Park Associates LLC.
Walnut Park Plaza (ADA)	3	Leased/Issued	No	Exiting site for low-income seniors in West Philadelphia sponsored by Walnut Park Associates LLC.
Walnut St	15	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Columbus Property Management.
WCRP TNI 1	12	Leased/Issued	No	Existing site for women and their families in North Philadelphia sponsored by Women's Community

Property Name	# of Project-Based Vouchers	Planned Status at End of Year	RAD?	Description of Project
				Revitalization Project. Supportive services provided.
WCRP TNI 2	9	Leased/Issued	No	Existing site for women and their families in North Philadelphia sponsored by Women's Community Revitalization Project. Supportive services provided.
WCRP-Grace	36	Leased/Issued	No	Existing site for women and their families in North Philadelphia sponsored by Women's Community Revitalization Project. Supportive services provided.
1315 North 8th Street	25	Leased/Issued	Yes	New construction of 30 units of affordable housing targeted for youths aging out of foster care in the West Poplar neighborhood (homeless) sponsored by Project HOME. Supportive services provided.
2415 N Broad St	88	Leased/Issued	Yes	New construction in North Philadelphia serving homeless individuals, sponsored by Project Home. Supportive services provided.
Blumberg Phase I	51	Leased/Issued	Yes	New construction in Sharswood neighborhood serving low-income families including 51 RAD and 6 other project-based vouchers sponsored by PHA.
Blumberg Senior	94	Leased/Issued	Yes	New construction of an existing site for seniors sponsored by PHA. Supportive services provided.
Cantrell Place	40	Leased/Issued	Yes	Substantial rehabilitation development in South Philadelphia for seniors, sponsored by Presbys Inspired Life. Supportive services provided.
Casas En La Plaza	29	Leased/Issued	Yes	Rehabilitation of existing family units in North Central Philadelphia, sponsored by Norris Square Community Alliance.
Courtyard at Riverview	470	Leased/Issued	Yes	Rehabilitation of existing housing serving low-income families and seniors, sponsored by Michaels Development.
Haddington III	48	Leased/Issued	Yes	New construction in West Philadelphia for low-income families, sponsored by 1260 Housing Development Corp. Supportive services provided.
HELP V	37	Leased/Issued	Yes	New construction in Northern Liberties serving veterans and senior veterans, sponsored HELP USA. Supportive services provided.
Lehigh Park I&II	49	Leased/Issued	Yes	Rehabilitation of existing housing serving low-income families, sponsored by HACE. Supportive services provided.
Norris CNI Phase II	74	Leased/Issued	Yes	New construction family public housing replacement units sponsored by PHA.
New Courtland at St Barts	42	Leased/Issued	Yes	New construction in Northeast Philadelphia for seniors, sponsored by New Courtland. Supportive services provided.
Plymouth Hall	53	Leased/Issued	Yes	Existing site for seniors in North Philadelphia, sponsored by PHA.
Roberto Clemente House	38	Leased/Issued	Yes	Substantial rehabilitation development in North Philadelphia serving low-income families, sponsored by Nueva Esperanza. Supportive services provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of Year	RAD?	Description of Project
Strawberry Mansion	55	Leased/Issued	Yes	New construction in North Philadelphia for low-income families, sponsored by PHA.
St John Neumann	52	Leased/Issued	Yes	New construction in South Philadelphia serving seniors, sponsored by Archdiocese of Philadelphia.
Witherspoon Senior Apts	40	Leased/Issued	Yes	New construction in West Philadelphia serving seniors, sponsored by Presbys Inspired Life. Supportive services provided.
	3,517	**Planned Total Existing Project-Based Vouchers**		

v. Planned Other Changes to Housing Stock

In FY 2020, PHA's development efforts under the "6 in 5", RAD and other development initiatives will continue to be guided by development principles approved by the PHA Board in September 2012. The development principles provide the framework for future development activities undertaken with public and private partners; 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 funding constraints, PHA's policy also emphasizes the importance of achieving maximum leverage with limited public funds.

PHA's development efforts also support the goals established in the Assessment of Fair Housing Plan jointly issued by the City and PHA and accepted by HUD in February 2017. These goals emphasize the importance of a balanced approach to fair housing including preservation of existing housing, development of new affordable rental and homeownership housing, investments to improve the quality of life in distressed neighborhoods, and mobility initiatives to support housing in high opportunity areas.

Working in collaboration with the City of Philadelphia, PHA will continue to further the shared goal of creating significant new affordable housing opportunities citywide. Table 5 provides a summary of other housing and neighborhood revitalization activities currently planned by PHA, including initiatives in support of the City of Philadelphia's affordable rental and homeownership goals. Additional initiatives may be added during the Plan year, subject to Board approval and any applicable HUD approvals, which may include acquisitions, housing and/or commercial development and other activities in support of PHA's Strategic Directions Plan. In addition, Appendix D includes PHA's Asset Management Table, which is periodically updated to provide an overview of planned or potential development, disposition, refinancing, conversion and/or homeownership activities at PHA sites.

Table 5: Other Planned Activities

Site	Description of Project
Brooklyn Heights	PHA is negotiating the acquisition (PRA) of land in the Mill Creek neighborhood to develop approximately 32 units.
Market West	PHA is working to acquire vacant sites in Haddington neighborhood to develop affordable sites in this West Philadelphia neighborhood.

Site	Description of Project
Gordon Street Phase II (Strawberry Mansion)	PHA is planning for the second phase development to support the newly developed Gordon Apartments.
Falls Ridge	PHA is finalizing plans for a long-term sale via competitive sale process of land at the former Schuylkill Falls public housing development. PHA terminated the previous development contract and will convey the land to the highest bidder.
Sharswood Acquisition	PHA completed the acquisition of privately owned parcels in the Sharswood neighborhood for the redevelopment of the Norman Blumberg development consistent with HUD-approved CNI Transformation Plan.
Sharswood Development	PHA has designated Hunt Companies as developer for certain off-site parcels in the Sharswood community. PHA and Hunt have developed a plan for additional housing development in support of the CNI Transformation Plan goals. PHA and Hunt Companies jointly applied for a Choice Neighborhood Implementation grant in September 2018.
Liddonfield	PHA completed the sale of this former public housing site to New Courtland, the selected developer who plans to build 300 rental units on the site, which will be supported by PHA with the issuance of vouchers.
2012 Chestnut Street	PHA entered into a development agreement with a private developer (Alterra Property Group) to develop the vacant, former PHA headquarters site at 2012 Chestnut Street into up to 200 units of housing of which 20% will be targeted to households with incomes at or below 80% of Area Median Income. The development will also include 7,000 square ft. of commercial space. The developer was chosen through an RFP process.
Bartram Village	PHA has entered into a predevelopment agreement with Pennrose Properties to evaluate the redevelopment of Bartram Village. PHA was awarded Choice Neighborhoods Planning grant funds for Bartram Village and the surrounding Kingsessing neighborhood to support the development of a comprehensive Transformation Plan. PHA intends to apply for a CNI Implementation grant in the future.
Vaux Community Building	PHA has completed Phase 1 renovations to the building, which serves as a community center and focal point for the Sharswood/Blumberg neighborhood revitalization effort. A neighborhood school operated by Big Picture Philadelphia has leased space in the building and began operations in September 2017. Temple University has signed a lease for a nurse-managed clinic that will open in late 2018. PHA is also completing negotiations with additional non-profit partners to lease space to provide work force, health care and other supportive services for low-income residents.
Vacant Lot Disposition	PHA owns over 700 vacant lot parcels. PHA plans to dispose of some of the properties for fair market value, to the Land Bank, to a PHA affiliate or alternate means.
2200-50 Turner Street	PHA may enter into a lease or purchase agreement for this existing parking lot facility in anticipation of future development activity.

vi. 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 continues to be a 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 Block Grant funding and programmatic flexibility remains a critical element in PHA's modernization and development efforts.

PHA has prepared a Five Year Capital and Development Plan, and maintains updated physical needs assessments for all PHA developments. Capital needs continue to dramatically exceed available funding.

Table 6 provides information on PHA's planned capital and development expenditures for FY 2020 including projects funded from MTW Block Grant and other sources. PHA is required to submit this Annual Plan in advance of receipt of federal funding information for the fiscal year. In light of the uncertainty of future funding, the information on Table 6 is preliminary and subject to change based on actual funding and other factors. Actual obligations and expenditures may vary based on factors such as construction schedules, timing of HUD and local approvals, availability of leveraged funding and new and emerging repair needs. Note that capital projects are often implemented over multiple years and may involve multiple funding sources.

Table 6: Planned Capital Expenditures in FY 2020

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	College View	Sanitary Upgrades	$ 900,000
Capital Improvements	Fairhill Apts	Joint Replacement, Fire Protection & Standpipe	$ 500,000
Capital Improvements	Raymond Rosen	Electrical Upgrades / wiring	$ 400,000
Capital Improvements	Spring Garden Apts	Electrical - Transformer Replacement	$ 200,000
Capital Improvements	Wilson Park	Backwater check valves & sanitary investigation	$ 125,760
Capital Improvements	Oxford Village	Sanitary Upgrades	$ 3,700,000
Capital Improvements	Scattered Sites 901-910	Heating Upgrades	$ 100,000
Capital Improvements	Scattered Sites 901-910	Painting	$ 200,000
Capital Improvements	Scattered Sites 901-910	Scattered Site Demolition	$ 823,000
Capital Improvements	Scattered Sites 901-910	Sitework - Concrete Repairs	$ 300,000
Capital Improvements	Scattered Sites 901-910	Roof repairs	$ 300,000
Capital Improvements	Arlene Homes	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Cecil B. Moore	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Champlost Homes	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	College View	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Fairhill Apartments	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Harrison Plaza	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Hill Creek	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Johnson Homes	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Morton Homes	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Oxford Village	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Queen Lane Apartments	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Raymond Rosen	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Richard Allen II	504 Site modifications/fair hsg	$ 5,000

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Spring Garden Apartments	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Strawberry Mansion	504 Site modifications/fair hsg	$ 25,000
Capital Improvements	Whitehall Apartments	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Haddington Homes	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Abbottsford Homes	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Wilson Park - Senior	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Arch Homes	504 Site modifications/fair hsg	$ 5,000
Capital Improvements	Fairhill Square	504 Site modifications/fair hsg	$ 25,000
Capital Improvements	Francisville	504 Site modifications/fair hsg	$ 25,000
Capital Improvements	Germantown/Hunting Park	504 Site modifications/fair hsg	$ 25,000
Capital Improvements	Haddington SS	504 Site modifications/fair hsg	$ 25,000
Capital Improvements	Kingsessing	504 Site modifications/fair hsg	$ 25,000
Capital Improvements	Ludlow	504 Site modifications/fair hsg	$ 25,000
Capital Improvements	Mantua	504 Site modifications/fair hsg	$ 25,000
Capital Improvements	Oxford Jefferson	504 Site modifications/fair hsg	$ 25,000
Capital Improvements	Susquehanna	504 Site modifications/fair hsg	$ 25,000
Capital Improvements	Commercial Space	Commercial Space upgrades	$ 1,000,000
Modernization	Scattered Sites 901	Scattered Sites - Rehab - Phase 6	$ 322,928
Modernization	Scattered Sites 902	Scattered Sites - Rehab - Phase 6	$ 826,877
Modernization	Scattered Sites 903	Scattered Sites - Rehab - Phase 6	$ 132,734
Modernization	Scattered Sites 904	Scattered Sites - Rehab - Phase 6	$ 265,500
Modernization	Scattered Sites 905	Scattered Sites - Rehab - Phase 6	$ 738,388
Modernization	Scattered Sites 906	Scattered Sites - Rehab - Phase 6	$ 414,207
Modernization	Scattered Sites 907	Scattered Sites - Rehab - Phase 6	$ 706,578
Modernization	Scattered Sites 908	Scattered Sites - Rehab - Phase 6	$ 405,259
Modernization	Scattered Sites 909	Scattered Sites - Rehab - Phase 6	$ 638,030
Modernization	Scattered Sites 910	Scattered Sites - Rehab - Phase 6	$ 281,478
New Development	Administrative	Warehouse/Maintenance Building	$ 1,375,000
New Development	Blumberg	Blumberg PH 4 On-Site Rental - 83	$ 31,000,000
New Development	Blumberg	Blumberg PH 5 Reynolds School	$ 25,000,000
New Development	Blumberg	Blumberg PH 9 - Harlan Street/Michaels Development Rental (42 new units of which 22 will be PBV; an additional 70 existing units will be moderately rehabilitated)	$ 25,000,000
New Development	Norris Choice	North Central CNI Phase 3 Replacement / Affordable	$ 30,000,000
RAD	27th & Susquehanna	27th & Susquehanna – RAD Transfer of Assistance	$ 19,000,000
RAD	Susquehanna Square	Susquehanna Square – RAD Transfer of Assistance	$ 15,600,000

Project Type	Site Name	Project Description	Total Estimated Budget
		Total	**$ 160,600,739**

Table 6A 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 begin in FY 2020. The listing of proposed projects and estimated budgets is preliminary and subject to change.

Table 6A: Additional Planned Capital Projects and Estimated Budget

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Raymond Rosen	Roof Replacement	$1,175,309
Capital Improvements	Scattered Sites 901-910	Heating Upgrades	$300,000
Capital Improvements	Scattered Sites 901-910	Painting	$400,000
Capital Improvements	Scattered Sites 901-910	Roof repairs	$600,000
Capital Improvements	Scattered Sites 901-910	Scattered Site Demolition	$1,646,000
Capital Improvements	Scattered Sites 901-910	Sitework - Concrete Repairs	$600,000
Capital Improvements	Scattered Sites 901-910	Window Replacement	$400,000
Capital Improvements	Wilson Park	Boiler Repairs	$450,000
Capital Improvements	Abbottsford Homes	504 Site modifications/fair hsg	$10,000
Capital Improvements	Arch Homes	504 Site modifications/fair hsg	$10,000
Capital Improvements	Arlene Homes	504 Site modifications/fair hsg	$10,000
Capital Improvements	Cecil B. Moore	504 Site modifications/fair hsg	$10,000
Capital Improvements	Champlost Homes	504 Site modifications/fair hsg	$10,000
Capital Improvements	College View	504 Site modifications/fair hsg	$10,000
Capital Improvements	Fairhill Apartments	504 Site modifications/fair hsg	$10,000
Capital Improvements	Fairhill Square	504 Site modifications/fair hsg	$50,000
Capital Improvements	Francisville	504 Site modifications/fair hsg	$50,000
Capital Improvements	Germantown/Hunting Park	504 Site modifications/fair hsg	$50,000
Capital Improvements	Haddington Homes	504 Site modifications/fair hsg	$10,000
Capital Improvements	Haddington SS	504 Site modifications/fair hsg	$50,000
Capital Improvements	Harrison Plaza	504 Site modifications/fair hsg	$10,000
Capital Improvements	Hill Creek	504 Site modifications/fair hsg	$10,000
Capital Improvements	Johnson Homes	504 Site modifications/fair hsg	$10,000
Capital Improvements	Kingsessing	504 Site modifications/fair hsg	$50,000
Capital Improvements	Ludlow	504 Site modifications/fair hsg	$50,000
Capital Improvements	Mantua	504 Site modifications/fair hsg	$50,000
Capital Improvements	Morton Homes	504 Site modifications/fair hsg	$10,000
Capital Improvements	Oxford Jefferson	504 Site modifications/fair hsg	$50,000
Capital Improvements	Oxford Village	504 Site modifications/fair hsg	$10,000
Capital Improvements	Queen Lane Apartments	504 Site modifications/fair hsg	$10,000

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Raymond Rosen	504 Site modifications/fair hsg	$10,000
Capital Improvements	Richard Allen II	504 Site modifications/fair hsg	$10,000
Capital Improvements	Spring Garden Apartments	504 Site modifications/fair hsg	$10,000
Capital Improvements	Strawberry Mansion	504 Site modifications/fair hsg	$50,000
Capital Improvements	Susquehanna	504 Site modifications/fair hsg	$50,000
Capital Improvements	Whitehall Apartments	504 Site modifications/fair hsg	$10,000
Capital Improvements	Wilson Park - Senior	504 Site modifications/fair hsg	$10,000
Capital Improvements	Harrison Plaza	Water Penetration	$4,000,000
ECM	Arlene Homes	LED Light Fixtures	$26,980
ECM	Arlene Homes	Weatherization/Infiltration	$54,741
ECM	Arlene Homes	Hybrid Heating/ DHW	$799,110
ECM	Abbottsford	Electrical Light Replacement	$52,400
ECM	BAS SCADA	BAS SCADA Repairs and recommissioning	$900,000
ECM	Bentley	LED Light Fixtures	$96,145
ECM	Bentley Hall	Weatherization/Infiltration	$102,759
ECM	Cassie L Holley	Roof Insulation	$98,019
ECM	Cassie L Holley	Weatherization/Infiltration	$37,431
ECM	Cecil B. Moore	Weatherization/Infiltration	$49,158
ECM	Cecil B. Moore	Heating Upgrades	$262,000
ECM	Cecil B. Moore	LED Light Replacement	$21,143
ECM	Champlost Homes	Increase Combustion Air	$44,499
ECM	College View	Weatherization/Infiltration - Crawl Space	$117,153
ECM	College View	LED Light Replacement	$24,216
ECM	Emlen Arms	Vacancy Sensors - Common	$16,827
ECM	Emlen Arms	Increase Combustion Air	$52,400
ECM	Gladys B Jacob	Weatherization/Infiltration	$74,720
ECM	Haverford Homes	Increase Combustion Air	$10,369
ECM	Haverford Homes	Weatherization/Infiltration	$31,952
ECM	Hill Creek	LED Interior Lights - Apts	$205,171
ECM	Hill Creek	Weatherization/Infiltration	$121,502
ECM	Hill Creek	Water Efficient Plumbing Fixtures	$468,071
ECM	Holmecrest Homes	LED Exterior Lights	$8,096
ECM	Holmecrest Homes	LED Interior Lights - Common	$3,049
ECM	Holmecrest Homes	Vacancy Sensors - Lighting - Common	$962
ECM	Holmecrest Homes	Boiler Replacement	$109,893
ECM	Holmecrest Homes	Heating Upgrades	$786,000

Project Type	Site Name	Project Description	Total Estimated Budget
ECM	Johnson Homes	Replace basement access metal grades with solid aluminum floor hatch	$772,900
ECM	Johnson Homes	LED Light Replacement/ Sensors	$457,986
ECM	Johnson Homes	Electrical - Motor Efficiency Upgrades	$58,950
ECM	Johnson Homes	Insulation - Crawl Space	$932,261
ECM	Johnson Homes	Increase Combustion Air	$262,000
ECM	Katie B Jackson	Install Additional Back-Up Power	$144,100
ECM	Katie B Jackson	LED Light Replacement	$77,860
ECM	Katie B Jackson	Weatherization/Infiltration	$26,729
ECM	Morton Homes	Replace Water Pipes	$262,000
ECM	Morton Homes	Insulation - Pipe	$1,754
ECM	Morton Homes	Weatherization/Infiltration	$468,186
ECM	Oxford Village	Increase Combustion Air	$85,973
ECM	Oxford Village	Insulation - Pipe	$18,752
ECM	Parkview Apts	Hybrid Heating / DHW	$474,472
ECM	Parkview Apts	LED Lighting	$25,078
ECM	Queen Lane Apts	LED Exterior Lights	$1,408
ECM	Queen Lane Apts	Increase Combustion Air	$8,208
ECM	Queen Lane Apts	Weatherization/Infiltration	$28,643
ECM	Raymond Rosen	Furnace Replacement	$2,892,480
ECM	Raymond Rosen	LED Lighting Replacement / Sensors	$635,782
ECM	Raymond Rosen	Increase Combustion Air	$238,479
ECM	Raymond Rosen	Weatherization/Infiltration	$510,676
ECM	Richard Allen II	LED Interior Lights - Apts	$98,555
ECM	Richard Allen II	Increase Combustion Air	$64,804
ECM	Spring Garden Apts	Furnace Replacement	$445,400
ECM	Spring Garden Apts	LED Interior Lights - Apts	$129,621
ECM	Spring Garden Apts	Insulation - Pipe	$9,488
ECM	West Park Apts	Aerco Replacement	$589,500
ECM	Whitehall Apts	Insulation - Pipe	$37,392
ECM	Wilson Park	LED Exterior Lights	$48,118
ECM	Wilson Park	LED Interior Lights - Apts	$536,863
ECM	Wilson Park	LED Interior Lights - Common	$43,750
ECM	Wilson Park	Heating & Power Upgrades	$733,720
ECM	Wilson Park	Water Heater Replacements	$327,500
ECM	Wilson Park	Aerco Replacement	$327,500
ECM	Wilson Park	Boiler Retube	$589,500
ECM	Wilson Park	Weatherization/Infiltration	$1,407,266

Project Type	Site Name	Project Description	Total Estimated Budget
ECM	Scattered Sites 901-910	Scattered Sites - Rehab	$18,000,000
Modernization	54th & Poplar	50 units	$17,500,000
New Development	Blumberg	PHA Phase 2 (9%)	$21,000,000
New Development	Blumberg	PHA Phase 3 (Homeownership	$12,000,000
New Development	Blumberg	PHA Phase 4 (4%)	$38,000,000
New Development	Blumberg	PHA Phase 5 (9%)	$22,000,000
New Development	Blumberg	Hunt Phase 1 (9%)	$22,000,000
New Development	Blumberg	Hunt Phase 2 (4%)	$45,000,000
New Development	Blumberg	Hunt Phase 3 (9%)	$23,000,000
New Development	Blumberg	Hunt Phase 4 (Homeownership)	$32,000,000
New Development	Blumberg	Hunt Phase 5 (9%)	$24,000,000
New Development	Blumberg	Blumberg Ridge Avenue West Commercial (50/mix)	$60,000,000
New Development	Blumberg	Blumberg Recreation Field (HOLD)	$15,000,000
New Development	Brooklyn Heights	Brooklyn Heights	$18,100,000
New Development	Gordon Street Extension	Gordon Extension - Phase II (25 units)	$8,750,000
New Development	Market West	5600 Haverford Avenue	$17,500,000
New Development	Millcreek West	Millcreek West	$17,500,000
New Development	Norris Choice	North Central CNI Phase 1 & 4 (30 HO)	$10,750,000
New Development	Norris Choice	North Central CNI Phase 5 (45 Replace.;61 Afford; 22 Mrkt)	$54,000,000
New Development	Strawberry Mansion	Walton School - Senior Housing	$18,000,000
New Development	Strawberry Mansion	Community Center	$6,400,000
New Development	Temple Area	Temple Area	$18,750,000
New Development	Arch/Haddington	RAD Conversion	$51,375,000
RAD	Bartram Village	Phase 1 RAD Conversion	$96,470,000
RAD	Bartram Village	Phase 2 RAD Conversion	$96,064,200
RAD	Cambridge I	RAD Conversion	$6,000,000
RAD	Cambridge II	RAD Conversion	$6,000,000
RAD	Cambridge III	RAD Conversion	$6,600,000
RAD	Fairhill Apts	RAD Conversion	$105,600,000
RAD	GGFE Phase I	Phase 1 RAD Conversion	$31,585,000
RAD	Harrison Plaza	RAD Conversion	$44,850,000
RAD	LEB I	RAD Conversion	$12,000,000
RAD	LEB II	RAD Conversion	$12,000,000
RAD	Suffolk Manor	RAD Conversion	$6,000,000
RAD	West Park Apts	RAD Conversion	$130,800,000
RAD	West Park Plaza	RAD Conversion	$9,750,000
		Total	**$1,162,953,929**

B. Leasing Information

PHA's 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 administrative or resident services purposes; or (iv) they are eligible for other HUD-authorized exclusions. While PHA is planning to add additional public housing units, the overall size of the public housing inventory continues to decline (and the HCV inventory increases) as units are converted to project-based assistance under RAD.

The Housing Choice Voucher program 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. PHA utilizes vouchers to support the Unit Based Voucher program, through which PHA provides long-term subsidy contracts with non-profit and other sponsors. In FY 2019, PHA was awarded an additional 99 Mainstream vouchers, and HUD issued 59 additional VASH vouchers. Periodically, HUD issues Enhanced Vouchers and Tenant Protection Vouchers (TPV) for PHA to administer. As allowed by the MTW Agreement, PHA incorporates Enhanced and Tenant Protection Vouchers into the MTW block grant when eligible.

i. Planned Number of Households Served

Table 7 provides information on households living in "MTW units" that PHA plans to serve during FY 2020. This includes all households residing in PHA public housing units as well as HCV MTW households. All of PHA's public housing units are "MTW units". The actual number of household served may vary from that listed on the tables. The conversion of public housing to project-based assistance under RAD began in FY 2017, and will continue in FY 2020. RAD vouchers are included in the total "Federal MTW Voucher (HCV) Units to be Leased" shown in Table 7. The number of public housing and HCV families served may be affected by the RAD conversion schedule. As shown in Table 7A, PHA does not operate any local, non-traditional programs as defined by HUD.

Table 7: Planned Number of MTW Households Served in FY 2020

Planned Number of Households Served Through:	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to be Served
MTW Public Housing Units Leased	157,188	13,099
MTW Housing Choice Vouchers (HCV) Utilized*	219,252	18,271
Local, Non-Traditional: Tenant-Based	0	0
Local, Non-Traditional: Property-Based	0	0
Local, Non-Traditional: Homeownership	0	0
Planned Total Households Served	**376,440**	**31,370**

**Includes 1,285 RAD vouchers*

Table 7A: MTW Local, Non-Traditional Programs

Local, Non-Traditional Category	MTW Activity/Number	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to be Served
Tenant-Based	N/A	0	0
Property-Based	N/A	0	0
Homeownership	N/A	0	0

Although not required by HUD, PHA has included Table 7B, which identifies non-MTW households served through Special Purpose Voucher programs. PHA will apply MTW policies to Special Purpose vouchers including Mainstream vouchers unless inconsistent with Appropriations Act requirements or the requirements of the applicable NOFA. If a conflict occurs, the Appropriations Act and/or this funding notice govern. PHA may also submit a request to the Office of Public Housing and Voucher Programs to operate HUD-VASH Vouchers in accordance with MTW administrative flexibilities.

Table 7B: Planned Number of Non-MTW Households Served in FY 2020

Non-MTW Program to be Served Through:	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to be Served
Mainstream	2,628	219
VASH	9,144	762
VASH Project Based	408	34
Moderate Rehab	2,436	203
SRO	3,552	296
Total Households Projected to be Served	**18,168**	**1,514**

ii. Discussion of Issues and Possible Solutions Related to Leasing

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
MTW Public Housing	RAD conversions and RAD transfer of assistance activities are expected to continue in FY 2020. As such, actual leasing figures for public housing may be affected by the schedule of development activities and relocation timetables. This in turn may result in scheduling changes or delays in re-occupancy and relocation activity that may ultimately affect leasing levels.
MTW Housing Choice Voucher	Leasing of HCV units in opportunity areas continues to be a high priority. PHA implemented the Housing Opportunity Program (HOP) in August 2013 to enhance its mobility initiatives. Mobility program staff conduct outreach and marketing and provide voucher holders with housing counseling and training before, during and after moves. PHA anticipates assisting approximately 50 clients in FY 2020 to find units in opportunity areas. HOP was initially funded by HUD; however, PHA is continuing the program utilizing MTW Block Grant funds.

C. Waiting List Information

PHA administers waiting lists in accordance with the HCV Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP) as applicable. Administration of site-based waiting lists for the Conventional and Scattered Site program areas is managed under the Public Housing Admissions Department to ensure consistent and efficient management of applicants on the various waitlists.

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.

i. Waiting List Information Anticipated

Table 8 provides information on PHA's waiting lists in the format required by HUD.

Table 8: Waiting List Information Projected for Beginning of FY 2020

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Wait List During the Fiscal Year
MTW Public Housing Units	First Available and Site-Based	13,104	Partially Open	No
MTW Public Housing Units *	Site-Based	41,959	Open	Yes
MTW Housing Choice Voucher Program	Community-Wide	13,486	Partially Open	No

**Units funded with LIHTC and managed by PAPMC*

Notes on Waiting Lists

- As specified in the ACOP, 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 are centrally managed by the Public Housing Admissions Department. This change was made to ensure consistent and efficient management of applicants on the various waitlists. Applicants may select specific sites or "first available" unit citywide. Centrally managed waitlists, administered by the Admissions Department, also include applicants that require a wheelchair accessible unit and those with a preference designation such as the Blueprint program.

- 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 ACOP (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. Under the Unit Based Program, site-based waitlists are managed and maintained by individual owners. PHA approves the site-based waitlists and tenant selection plan for each Unit Based development.

ii. Planned Changes to Waiting List in FY 2020

Waiting List Name	**Description of Planned Changes**
All	PHA currently has sufficient applicants on the waiting list to support full occupancy of units that are available for occupancy. PHA will continue to monitor the number of households on each waiting list to ensure an adequate number of applicants. As needed, PHA will open waiting lists and/or undertake affirmative marketing activities to ensure appropriately sized waiting lists for all unit types, sizes and developments. The following is a summary of wait list policy/organizational changes and issues for FY 2020: • PHA may update one or more of its waiting lists in FY 2020. Waiting list updates will be completed in accordance with applicable ACOP/Administrative Plan policies. • PHA continues to evaluate implementation of new preferences that incorporate employment, educational, and/or job training requirements as a condition of occupancy. 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 ACOP and/or HCV Administrative Plan in FY 2020, 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. • When a public housing development for which PHA maintains a Site Based Waiting List (SBWL) is converted under RAD to Project Based (PB) Assistance, PHA will transition the existing public housing SBWL to a PB SBWL pursuant to the approved, relevant RAD significant amendment. Applicants will retain their date and time of application. After the initial waiting list has been established, PHA shall administer its waiting list for the converted project in accordance with the applicable policies in its Administrative Plan. • When PHA converts a new or existing public housing development under RAD which does not have an existing SBWL, PHA will establish a waiting list and will follow the policies in its Administrative Plan regarding establishing and administering the waiting list including a review of each development's tenant selection plan. • Where RAD conversion activities result in extended periods of time where PHA will not be leasing units, PHA will establish a wait list policy to allow applicants who are only on the affected SBWL to select one additional SBWL while retaining their date and time of application. Additionally, if conversion activities result in PHA no longer offering certain sized units at a site, PHA will establish a policy whereby applicants affected by the unit size change would be able to select one new SBWL while retaining their date and time of application. These wait list policies do not require MTW authorization. • In furtherance of the fair housing goals detailed in the joint PHA-City Assessment of Fair Housing, PHA will continue to evaluate and update as needed its waiting list policies including outreach efforts to ensure open and fair access to all citizens regardless of race, ethnicity or protected class status.

III. PROPOSED MTW ACTIVITIES

PHA proposes two (2) new MTW activities for FY 2020:

1. Local Family Self-Sufficiency Program Flexibility
2. Sponsor-Based Shared Housing Initiative

Information on each proposed activity in the required HUD format follows.

PROPOSED ACTIVITY 2020-1: LOCAL FAMILY SELF-SUFFICIENCY PROGRAM FLEXIBILITY

A. Activity Description

PHA proposes to enhance its local Family Self-Sufficiency (FSS) program to encourage more residents to participate in the program. Under this MTW activity, PHA will eliminate the current regulatory requirement that FSS participants must have an interim or regular recertification within 120 days prior to enrollment in the FSS program. PHA will utilize the last interim or regular recertification prior to enrollment as the basis for FSS escrow calculations.

PHA plans to implement this activity beginning in the first quarter of FY 2020. It will apply to all new FSS participants that are enrolled in the program on an ongoing basis following HUD approval of the activity.

B. Activity Metrics Information

HUD requires that MTW agencies utilize and report on relevant HUD standard metrics associated with the applicable MTW statutory objective. Accordingly, PHA will utilize the following metrics for this activity. Data sources will include PHA's 50058 resident data and FSS participant reports provided by PHA's FSS contractor/partner.

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).	HCV: $21,099 PH: $27,049	HCV: $23,499 PH: $29,449		
**Metric applies to participants who enroll in FSS after approval of this MTW Activity and who have been FSS participants for at least six months at the end of reporting period. Baseline is based on March 2019 average earned income of PHA households with earned income. Baseline may be adjusted at later date to reflect actual earned income at enrollment of participants affected by this activity. Annual benchmark reflects projected average earned income increase of $2,400 for participants who have been in FSS for at least six months.*				
SS #2: Increase in Household Savings*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of savings/escrow of households affected by this policy (increase).	$0	$990		
**Metric applies to participants who enroll in FSS after approval of this MTW Activity and who have been FSS participants for at least six months at the end of reporting period. Baseline is 0 because participants do not have escrow account balances at the date of enrollment. Annual escrow benchmark reflects projected average escrow amount only for participants with escrow at six months.*				
SS #3: Increase in Positive Outcomes in Employment Status*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Unemployed	108 (72%)	93 (62%)		
Employed	42 (28%)	57 (38%)		

Enrolled in Education	0	10		
Enrolled in Job Training	0	20		

**Metric applies to participants who enroll in FSS after approval of this MTW Activity and who have been FSS participants for at least six months at the end of reporting period. Baseline for unemployed/employed is based on PHA-wide average percentages, and then applied to projected 150 participants. Baseline and benchmarks may be adjusted at later date to reflect employment status at enrollment of participants affected by this activity.*

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)	17 (11.6%)	17 (11.6%)		

**Metric applies to participants who enroll in FSS after approval of this MTW Activity and who have been FSS participants for at least six months at the end of reporting period. Baseline for households receiving TANF is based on PHA-wide average percentage, and then applied to projected 150 participants. Baseline and benchmarks may be adjusted at later date to reflect TANF status at enrollment of participants affected by this activity.*

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	150		

**Metric applies to participants who enroll in FSS after approval of this MTW Activity.*

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

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy (or local non-traditional subsidy) per household affected by this policy in dollars (decrease).	$1,321,200	$1,213,200		

Metric applies to participants who enroll in FSS after approval of this MTW Activity and who have been FSS participants for at least six months at the end of reporting period. Baseline is the PHA average HAP of $734 multiplied by 12 months for 150 participants. Benchmark is based on projected decrease in subsidy as a result of projected $2400 average annual increase to participant earned income. Baseline and benchmark may be adjusted at later date to reflect subsidy amount at enrollment of participants affected by this activity. PHA notes that this metric does not account for the fact that subsidy costs may rise even while tenant incomes increase as a result, for example, of increases to rents to owners.

SS #7: Increase in Agency Rental Revenue*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase).	$556,200	$664,200		

** Metric applies to participants who enroll in FSS after approval of this MTW Activity. PHA uses Total Tenant Payment (TTP) as the household contribution toward housing assistance. Baseline is the PHA average TTP of $309 per month multiplied by 12 months for projected 150 participants. Benchmark is based on projected increase in TTP of $60 per month participant using projected $2400 average increase in earned income. Baseline and benchmark may be adjusted at later date to reflect actual TTP at enrollment of participants affected by this activity. PHA notes that this metric does not account for the fact that PHA will pay out escrow savings accounts for FSS program graduates.*

SS #8: Households Transitioned to Self-Sufficiency *

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Number of households transitioned to self-sufficiency (increase).	0	0		

** Metric applies to participants who enroll in FSS after approval of this MTW Activity. PHA defines self-sufficiency as graduation from the FSS program. FSS is a five-year program. No graduations are projected during the initial year of this activity.*

C. Cost Implications

PHA projects that there will be no measurable cost impact on PHA administrative costs as a result of this activity. As noted above, projected increases to average earned income of FSS participants may increase Total Tenant Payment by an estimated $60 per year, or $9,000 for all 150 participants.

D. Need/Justification for MTW Flexibility

This activity requires waiver of 24 CFR 983, as allowed under the MTW Agreement, Attachment C, paragraph E. Current regulations require that FSS participants have an interim or regular recertification within 120 days prior to enrollment in the FSS program. Based on the experience of PHA and its FSS partner (Compass Working Capital), this requirement poses an obstacle to participation by some residents. Removing this requirement will have no negative impact on either PHA or residents, and will support higher levels of participation by residents.

E. Rent Reform/Term Limit Information

Not applicable.

PROPOSED ACTIVITY 2020-2: SPONSOR-BASED SHARED HOUSING PILOT

A. Activity Description

PHA proposes to implement a pilot program that will expand housing options for homeless individuals and other hard to serve special populations. It will build on and enhance the ongoing collaboration between the City and PHA to reduce homelessness through the "Blueprint to End Homelessness" initiative. The pilot program will initially be limited to up to twenty-five (25) units; however, using a shared housing model, the projected number of individual, low-income households to be served is up to one hundred (100) individuals. Based on an evaluation of the program's effectiveness in reducing homelessness and providing stable housing for participants, PHA may elect to expand the program in the future. The elements of the pilot program include:

- Using grant funding provided by the City to leverage MTW funds, PHA will rehabilitate existing vacant and uninhabitable scattered site public housing units. Units will generally be large-bedroom sizes with 3+ bedrooms per unit. No liens will be placed on the properties.

- PHA will enter into a master lease for one or more of the rehabilitated units with the City and/or qualified local, non-profit provider(s) that serves formerly homeless individuals and/or other hard to serve populations, i.e. youth aging out of foster care, chronically homeless, victims of domestic violence, etc.

- PHA does not intend to mix different target populations within the same unit. Supportive services will be offered directly and/or through referrals based on the needs and priorities of the resident population served, which may include case management, behavioral health services, preventive health care, adult education, employment and training, and/or other services.

- Under the terms of the master lease, the City and/or designated provider(s) ("Sponsor Agency") will pay a flat rent to PHA. PHA will negotiate a nominal monthly payment, projected to be in the range of $500-$750 per unit. PHA will not collect or receive rents from individual tenants. The Sponsor Agency(s) will be allowed to sublease individual rooms within the unit to eligible, low-income individuals. The Sponsor Agency(s) will provide a shared housing model and supportive services to program participants and will: screen and determine eligibility of participants; maintain a waiting list if needed; implement a rent policy by which participants will pay no more than 30% of income for rent; enter into sublease agreements with participants; collect rents; and, develop and enforce house rules. PHA does not anticipate that on-site staffing will be required.

- Participants in this pilot program will not be considered public housing residents, and will not have the responsibilities and rights associated with PHA public housing resident households. Based on discussions with HUD, PHA plans to request HUD approval to classify the units covered under master lease as "MTW Neighborhood Services" units in accordance with PIH 2011-7. PHA will then report on households served through the

MTW 50058 form. PHA's understanding is that each occupied unit will count as one household for MTW purposes, irrespective of the number of individuals sharing the unit.

- Participants will not be subject to PHA's Admissions and Continued Occupancy Policies including, but not limited to, those related to Eligibility Determination, Continued Occupancy, Transfers, Informal Hearings or Grievance Hearings. However, participants will be subject to admissions and continued occupancy policies established by the City or qualified, local non-provider with whom PHA has entered into a master lease.

- Participants will not enter into lease agreements with PHA, and will not pay rent to PHA.

- Lease enforcement (up to and including evictions), house rules enforcement, rent collection and other property management activities will be the responsibility of the City or qualified local, non-profit provider with whom PHA has entered into a master lease.

- Participants will not be subject to public housing Community Service requirements.

- PHA will ensure that all units meet UPCS standards at initial inspection. PHA's role will be to prepare the unit for initial occupancy and perform routine and emergency maintenance services.

- The City and/or Sponsor Agency(s) will provide PHA will quarterly reports that provide basic data on program participants including household income, dates of occupancy, supportive services provided, outcomes achieved and other required information.

PHA is currently engaged in negotiations with the City on implementation of the pilot program. PHA projects that implementation will begin in the 2nd or 3rd quarter of FY 2020 and then be an ongoing activity. PHA has set a goal of 10 units under master lease for the Plan year.

B. Activity Metrics Information

HUD requires that MTW agencies utilize and report on relevant HUD standard metrics associated with the applicable MTW statutory objective. Accordingly, PHA will utilize the following metrics for this activity. Data sources will include reports from the City and/or Sponsoring Agency(s) on households served and PHA internal data.

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	10		
**Annual goal for FY 2020 is 10 units.*				
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	10		

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C. Cost Implications

PHA projects that there will be no measurable cost impact on PHA administrative costs as a result of this activity; however, PHA projects that non-PHA resources will be leveraged to support the rehabilitation of currently vacant and uninhabitable scattered site units.

D. Need/Justification for MTW Flexibility

This activity requires waivers of existing public housing regulations at 24 CFR 903 to allow for a shared housing model; entering into a master lease agreement with an agency; use of alternative rent structures; and, special admissions and continued occupancy policies. As noted, participants housed under this activity will not be public housing residents. The authorizations from the MTW Agreement which allow PHA to conduct this activity include: Attachment D, Section II, paragraph; Attachment C, section B, paragraph 4; Attachment C, section C, paragraphs 1,2,4,10,11. As discussed with HUD, PHA has included the Attachment C, paragraph 11 waiver as it may be necessary for PHA to receive master lease payments in lieu of direct tenant rents to PHA. Also, it is possible that term limits may be implemented for some target populations in accordance with the applicable program rules of the City and/or Sponsoring Agency.

E. Rent Reform/Term Limit Information

Not applicable.

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. Additional detail on approved MTW activities is included in prior Annual Plans. 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

ACTIVITY 2011-1: PARTNERSHIP PROGRAMS INITIATIVE

Plan Year Approved, Implemented, Modified

- Approved FY 2011
- Implemented FY 2012
- Modified FY 2013 to incorporate specific components applicable to the youth aging out of foster care partnership with the Philadelphia Department of Human Services (DHS)

Description/Update

PHA will continue to utilize MTW authority to expand public housing for special needs and other targeted groups in partnership with non-profit neighborhood groups, universities, state and local government, and other stakeholders. This flexible, services-oriented model allows PHA to leverage PHA and partner resources to provide public 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 this initiative include, but are not limited to, the following:

- Admissions and continued occupancy requirements for the initiative may vary from standard public housing 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. 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 invested in 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 permanent supportive 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 of the 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, or other requirements; time limits on housing subsidies; modified occupancy standards; availability of stipends; and other components.

In FY 2020, PHA projects that 262 additional public housing units will be developed by PHA development partners at 7 sites. See Table 1 for additional detail on planned developments and units. The actual number of units developed and the development timetable may vary depending on final financing plans, construction schedules, HUD approval timetables and other factors.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

Benchmarks have been updated to reflect projected FY 2020 housing production under 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	262		
** 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 developers and/or 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 FY 2020 require MTW waivers at present other than the use of MTW Block Grant funds*				
CE #4: Increase in Resources Leverage – ALL Planned FY 2020 Projects **				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Amount of funds leveraged in dollars (increase).	$0	$102 million		
*** Represents total development costs of each development project as reported by PHA development partners.*				

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2004-1: NEIGHBORHOOD DEVELOPMENT & REVITALIZATION INITIATIVES

Plan Year Approved, Implemented, Modified

- Design Standards
  - Approved FY 2004
  - Implemented FY 2004

- Total Development Cost Limits and Housing Cost Caps
  - Approved FY 2004
  - Implemented FY 2004

- Streamlined Mixed-Finance Development Process
  - Approved FY 2004
  - Implemented FY 2004

- MTW Site and Neighborhood Standards
  - Approved FY 2004
  - Implemented FY 2004

- Streamlined Acquisition Process
  - Approved FY 2002
  - Implemented FY 2002

- Strategy for Development
  - Approved FY 2005
  - Implemented FY 2005

Description/Update

PHA will continue to use 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. Public housing development or redevelopment activities, and other new development, directly undertaken by PHA as developer are included under this initiative. To support these redevelopment activities, PHA continues to implement the following MTW components, which also 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.

- *MTW 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).

- *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.

- *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.

- *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.

- *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.

Planned Non-Significant Changes

No non-significant changes are planned. PHA may submit updated MTW TDC/HCCs for HUD approval as part of a future Plan or Plan Amendment.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2004-2: SERVICE-ENRICHED HOUSING FOR SENIORS & PEOPLE WITH DISABILITIES

Plan Year Approved, Implemented, Amended

- Nursing Home Transition
  - Approved FY 2010
  - Implemented FY 2010

- Definition of Elderly
  - Approved FY 2004
  - Implemented FY 2004

Description/Update

PHA will continue to collaborate 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 MTW program components:

- *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/housing opportunities for referrals of disabled consumers in need of low-income housing. NHTI families may be eligible for a preference for public housing or HCV.

- *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.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2004-3: SIMPLIFICATION AND STREAMLINING OF RENT AND RECERTIFICATION PROCESSES FOR PUBLIC HOUSING AND HCV

Plan Year Approved, Implemented, Amended

- Two and Three-Year Recertification/Limit on Interims
  - Approved FY 2004
  - Implemented FY 2004

- Ceiling Rents
  - Approved FY 2004
  - Implemented FY 2004

- Rent Calculation Method
  - Approved FY 2004
  - Implemented FY 2004
  - Modified FY 2017

- Payment Standards
  - Approved FY 2008
  - Implemented FY 2008

- Reasonable Rent
  - Across-the-board Rent Increases
    - Approved FY 2008
    - Implemented FY 2008

  - Streamline Reasonable Rent Determinations
    - Approved FY 2005
    - Implemented FY 2005

- Utility Allowances
  - PGW CRP Program
    - Approved FY 2009
    - Implemented FY 2014

  - PECO Customer Assistance Plan Enrollment
    - Approved FY 2011
    - Not yet implemented

  - Interim Recertification Utility Allowance
    - Approved FY 2017
    - Implemented FY 2017

  - Philadelphia Water Departments Tiered Assistance Program (TAP)

- Approved FY 2019
- Not yet implemented

Description/Update

PHA will continue to implement a series of MTW 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.

- *Two and Three-Year Recertification/Limit on Interims* – Public Housing and HCV, including UBV/RAD require recertifications every two years, except for public housing residents choosing ceiling rents who are recertified every three years. Voluntary interim recertifications are restricted to one every six months, except for elderly and disabled households who are exempt from this restriction. PHA will process voluntary interim rent reductions if and when the reduction in income lasts for more than 30 days. In FY 2017, PHA began conducting recertifications every three years for elderly or disabled households on fixed incomes in both the HCV and public housing program.

- *Ceiling Rents* – PHA has established ceiling rents for its public housing developments, which are periodically updated. PHA tenants will continue to have the option of selecting either a ceiling rent or an income-base rent. PHA uses ceiling rents when calculating rent for mixed families.

- *Rent Calculation Method* – PHA has established an alternative rent structure for the HCV (including UBV/RAD) and public housing programs to motivate residents to work and accumulate savings. In FY 2017, PHA began allowing households with up to $50,000 in assets to self-certify asset value and income from the assets. Asset income is excluded when the value of the household's asset is less than $50,000. Asset income for household assets valued at greater than $50,000 is calculated by using the market value of the asset times the passbook savings rate. Also in FY 2017, PHA began excluding all full-time student earned income for family members other than the Head, Spouse or Co-Head and PHA discontinued verification of full-time student income as 100% of the income is excluded.

- *Payment Standards* – PHA has implemented a policy in the HCV program whereby the current payment standard is applied at regular recertification. In FY 2017, PHA began approving payment standards up to 120% of the FMR to support leasing for existing voucher clients and/or new voucher holders who wish to move to areas with documented improved educational systems, job opportunities, social services and other opportunities in the expectation that over time their need for housing and other subsidies will abate or diminish.

- *Minimum HAP Payment* - Starting in FY 2019, PHA adopted a policy for tenant-based voucher units only whereby the HAP contract terminates automatically 180 calendar days after the last housing assistance payment to the owner of $50 or less. This allows PHA to provide assistance to a greater number of households by freeing up vouchers held by households with minimal assistance. This policy does not apply to the UBV program.

- *Reasonable Rent*
  - PHA has implemented a reasonable rent policy for the HCV program, including UBV/RAD, 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 redetermination.

  - 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.

- *Utility Allowances*
  - PHA is authorized to implement a revised utility allowance methodology that includes the following components:
    - HCV participants who are responsible for paying gas heat and who are eligible to participate in the PGW Customer Responsibility Program (CRP) have the gas portion of their utility allowances calculated using an alternative methodology. PHA may elect to implement this utility allowance program in public housing where applicable.
    - PHA will periodically, at its discretion, review HCV utility allowance schedules to determine if adjustments are required. Annual updates are not required.
    - Utility allowances may be phased out for residents with incomes at or above 80% of Area Median Income or public housing residents on ceiling rent.
    - 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 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.

  - For HCV participants only, during an interim recertification PHA will apply the utility allowance in effect on the effective date of the interim recertification; however, families on the Alternate UA CRP Program will have their gas utility allowance updated at the time of interim recertification consistent with PHA's MTW UA policies. During an interim recertification, PHA will apply the payment standard in effect at the last regular recertification.

  - PHA will further expand the utility allowance policy to require public housing and HCV tenants, whose incomes are at or below 150% of the Federal Poverty Level and who receive a utility allowance for water, to enroll and participate in the Philadelphia Water Departments Tiered Assistance Program (TAP). TAP provides customers with significant savings by offering a consistent bill based on their income. PHA will base the water utility

allowance for eligible households on the amount charged under the TAP program. Water charges range from 2% to 3% of gross income.

PHA adopted Small Area Fair Market Rents (SAFMR) beginning in FY 2019. In FY 2020, PHA will continue to explore and analyze MTW options to HUD's SAFMR regulations that will promote residential mobility among HCV participants and avoid negative impacts on current and future participants. PHA may propose MTW modifications that address housing market conditions in Philadelphia in a future MTW Annual Plan.

Planned Non-Significant Changes

No non-significant changes are planned. PHA notes that, notwithstanding legislative changes enacted as part of HOTMA, PHA intends to continue to use its MTW flexibility to provide the ceiling rent option to public housing households regardless of the household's income level at recertifications.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2004-4: UNIT-BASED LEASING AND DEVELOPMENT PROGRAM

Plan Year Approved, Implemented, Amended

- Approved FY 2004
- Implemented FY 2004
- Modifications in FY 2017, FY 2019

Description/Update

Under PHA's Unit-Based Leasing and Development Program ("UBV" or the "Unit-Based Program"), PHA will continue to negotiate long-term subsidy contracts with for-profit and non-profit private sector housing providers based on property specific agreements. PHA prioritizes the selection of developments which serve underserved populations and/or which incorporate supportive services on-site or nearby. Key features of PHA's UBV program include:

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

- Rents to 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 may determine that a shallow 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. In February 2017, with the support of the local Veterans Administration, PHA requested HUD approval to enter into a HAP contract under the HUD VASH-PBV program for an existing, 14-unit shared housing facility (Hancock Manor) operated by Impact Services. HUD accepted PHA's use of the existing MTW waiver related to shared living facilities in project-based developments for this VASH project. Subject to HUD approval and the support of the VA, PHA may apply MTW waivers related to shared housing facilities in project-based developments to future VASH projects.

- 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, PHA reviews and approves the tenant selection plan, and owners refers families to PHA for eligibility screening.

- 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 flexibility, PHA does not provide UBV participant families who want to move with tenant- based assistance with a tenant-based HCV voucher, except where required under the RAD program or otherwise offered by PHA as a reasonable accommodation, VAWA transfer or due to HQS failures under certain circumstances.

- While PHA's standard initial lease term for public housing and HCV is two years, PHA may allow a shorter term for UBV transitional housing units in order to facilitate the movement of families through the housing continuum and to obtain "permanent" housing more rapidly.

- PHA applies its MTW UBV policy to RAD developments and may project-base 100% of the units in a RAD UBV development.

- PHA is not subject to the requirement for an independent entity to approve AHAP/HAP contract terms, renewals of HAP contracts, rent determinations and inspection of PHA owned units.

- PHA applies the following rent simplification initiatives to the UBV/RAD program: two and three year recertifications; limit on interim recertifications, alternative rent structure and reasonable rent.

- PHA may utilize local forms which reflect PHA's MTW UBV policies and procedures as an alternative to HUD standard forms. For example, PHA will prepare a local PB HAP contract

and PB Tenancy Addendum to reflect MTW policies including but not limited to, rent determination methods, recertification frequencies and right to move policies.

- PHA defines a UBV "project" to include contiguous and/or non-contiguous scattered site housing units owned by a single owner and covered by a single Housing Assistance Payments contract. For such scattered site projects, PHA implements an alternative method to determine rent reasonableness whereby PHA bases the rent reasonableness determination for all units in the project that are within the same submarket area on the rent reasonableness determination made for a single unit of each bedroom size. For example, the rent reasonableness determination for all one bedroom units in the project will be based on the rent reasonableness determination made for a single one-bedroom unit in the project provided that the units are in the same submarket area.

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."

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 2020, PHA may issue requests for proposals, conduct evaluations and recommend additional units and developments for approval by the PHA Board. Additionally, in FY 2020, PHA will continue to enter into UBV contracts for projects that have been approved for conversion under RAD.

See *Section II. General Operating Information* for listings of planned and current UBV developments.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

Benchmarks have been updated to reflect projected UBV activity in FY 2020.

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	702 units		
**HUD requires this metric track only newly constructed and/or rehabilitated units that were put under HAP Contract during the Plan year. This excludes planned RAD conversions of existing public housing including PAPMC-managed units; however, it does include any newly constructed or substantially rehabilitated RAD conversion units.*				
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	1,387 households		
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	381 households		

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2005-2: STREAMLINE THE ADMISSIONS AND TRANSFER PROCESS

Plan Year Approved, Implemented, Amended

- MTW Transfers
  - Approved FY 2005
  - Implemented FY 2005

- HCV Waiting List
  - Approved FY 2012
  - Implemented FY 2012

- Public Housing Waiting List
  - Approved FY 2012
  - Implemented FY 2012

Description/Update

PHA will continue to utilize MTW flexibility to implement 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.

- *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.

- *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.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2005-3: HCV PROGRAM EFFICIENCIES

Plan Year Approved, Implemented, Amended

- Restriction on Elective Moves
  - Approved FY 2008
  - Implemented FY 2008

- Criteria for Portability Moves
  - Approved FY 2013
  - Implemented FY 2013

- Development of Local Forms
  - Approved FY 2017
  - Implemented FY 2017

Description/Update

PHA will continue to utilize MTW flexibility to implement efficiencies in the HCV Program designed to simplify processing and streamline administrative processes. This activity includes:

- *Restriction on Elective Moves* –Families are permitted to move within PHA's jurisdiction after the initial term of assisted occupancy and at the time of regular recertification.

- *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.

- *Development of Local Forms* - PHA will prepare local forms which reflect PHA's MTW policies and procedures.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2016-1: SECOND CHANCE INITIATIVE

Plan Year Approved, Implemented, Amended

- Approved FY 2016
- Implemented FY 2016
- Modified FY 2018

Description/Update

PHA will continue to utilize MTW flexibility to support implementation of the Second Chance Housing Choice Voucher Pilot Program. 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. 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. In the 2017 Annual Plan, PHA indicated that placements in public housing units may be offered to Second Chance participants in good standing at PHA's option.

Housing assistance is available to the participants for a period of up to two years, at which point the objective is for participants to transition off the program to other affordable housing. However, PHA may allow Second Chance participants to transition to the HCV or public housing program to continue their tenancy.

In FY 2018, PHA entered into a new partnership with the Pennsylvania First Judicial Court's MENTOR program. This pilot initiative allows 20 qualified returning citizens who are working with the MENTOR program to move in with existing PHA public housing households, provided that the PHA household is in good standing and is willing to add a MENTOR program participant to the lease. This will help to re-unite families, prevent homelessness and, hopefully, interrupt the cycle of recidivism.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2019-01: OPENING DOORS TO AFFORDABLE HOMEOWNERSHIP

Plan Year Approved, Implemented, Amended

- Approved FY 2019
- Implementation beginning in FY 2019

Description/Update

PHA will continue to utilize MTW Block Grant funding and programmatic flexibility to expand first-time affordable homeownership initiatives to increase housing choice and the number of first time, low-income homebuyers. The program builds on the existing framework and consolidates PHA's existing HUD-approved 5h Homeownership Program, HCV Homeownership Program, other new development homeownership initiatives and homeownership readiness and counseling support under the management of PHA's Homeownership Department. Further, this activity expands PHA's existing programs to incorporate new types of assistance including lease-purchase and down payment assistance options.

Under the existing 5h program, PHA assists current public housing residents of scattered site units to purchase their own units; however, the program is limited to current residents of the unit, and does not incorporate post-purchase voucher assistance. To date, 192 residents have purchased their scattered site units under 5h. Under the existing HCV Homeownership program, current voucher participants may utilize their voucher assistance to purchase homes and then receive monthly Housing Assistance Payments to support housing costs for up to a fifteen (15) or thirty (30) year period. To date, PHA has assisted 625 HCV participants to purchase their first homes.

In addition to 5h and HCV Homeownership, to date, PHA has developed and sold 306 new homeownership units that were developed as part of HOPE VI, mixed finance and other major revitalization initiatives. PHA also has worked with over 1,100 residents to complete homeownership counseling courses in partnership with HUD-approved housing counseling agencies.

The MTW Opening Doors to Affordable Homeownership Program (ODAHP) consolidates, streamlines and enhances these existing initiatives while modifying eligibility and post-purchase support criteria and adding new financing support mechanisms. Key features of the new program include:

Program Components
ODAHP participants work with PHA's Homeownership Department to review their financial status, credit standing and household goals. Participants are required to meet all eligibility requirement including successful completion of approved homeownership counseling and financial literacy courses. Financing options available to program participants include:

- *Monthly voucher assistance*: Households may receive monthly Housing Assistance Payments assistance for up to 15 or 30 years. Generally, this assistance will cover the

difference between up to 28% of adjusted household income and the projected monthly homeownership costs, subject to a cap that is equal to PHA's voucher payment standard. PHA's rent simplification policies will be utilized to calculate household adjusted income and tenant monthly payments. Households will be recertified on a biennial basis per PHA's existing policy. Per PHA's MTW policy, assistance will be ended 180 days after a household income rises such that the PHA subsidy equals $50 or less. Monthly voucher assistance may be used for private market units as well as for PHA scattered site units following sale. However, PHA will record a soft second mortgage on the title with a 15 or 30-year period, which is related to the voucher assistance term. In the event of a default, PHA will receive notification and attempt to work with the household to develop a financial workout plan to avoid foreclosure.

- *Down payment assistance:* In lieu of receiving monthly voucher assistance, ODAHP participants will be eligible for one-time down payment assistance up to a maximum of $15,000 per household. Participants receiving down payment assistance will not be recertified. However, PHA will record a soft second mortgage on the title with a 20-year recapture period. In the event of a default, PHA will receive notification and attempt to work with the household to develop a financial workout plan to avoid foreclosure. If the default is not cured, PHA will recoup the down payment assistance amount, which will decrease 5% annually over the 20-year term.

- *Soft second mortgage option:* Up to a maximum of $50,000 per household may be provided as a soft second mortgage, provided that the household is not receiving other PHA homeownership assistance. Participants receiving this assistance will not be recertified. However, PHA will record a soft second mortgage on the title with a 20-year recapture period. In the event of a default, PHA will receive notification and attempt to work with the household to develop a financial workout plan to avoid foreclosure. If the default is not cured, PHA will recoup the soft second mortgage amount, which will decrease 5% annually over the 20 year term.

- *Lease to purchase option:* PHA plans to implement lease to purchase options that can be implemented in private market rentals and scattered sites that are still part of PHA's public housing inventory. A portion of the tenant rent will be escrowed during the lease to purchase period and then applied to the down payment at the time of purchase. Lease to purchase participants will be recertified per PHA's existing policy.

As with the current 5h program, all scattered site units are eligible for sale to ODAHP participants without requiring additional HUD disposition approval.

For the down payment assistance and soft second programs, PHA has established reasonable maximum limits of $15,000 and $50,000. These amounts were determined based on PHA's internal assessment of the level of assistance needed to ensure successful first time homeownership among current program participants given current Philadelphia housing market conditions. Note, however, that PHA will authorize only the minimum amount needed to close the affordability gap based on individual household circumstances. PHA will calculate the maximum mortgage payment allowed at 35% of adjusted monthly income, and total housing expenses at 38% of

adjusted monthly income. The amount of down payment or soft second assistance to be provided by PHA will be calculated by PHA's Homeownership Opportunities Department staff based on a complete review of household finances. As part of this review, PHA staff will work to maximize household eligibility for any other non-PHA downpayment and/or closing cost assistance programs.

PHA budgets approximately $1.5 million in MTW Block Grant funds yearly to support the program. The number of households served will vary, depending on the mix of financing options utilized by participants. If demand exceeds available budget, PHA will establish a wait list based on date and time of application.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2019-2: SHARSWOOD YOUTH & FAMILY ENRICHMENT SERVICES

Plan Year Approved, Implemented, Amended

- Approved FY 2019
- Implemented in FY 2019

Description/Update

PHA will continue to utilize MTW Block Grant funding flexibility to support after school programs designed to help improve educational outcomes and high school graduation rates for PHA youth and other low-income youth living in the Sharswood/Blumberg neighborhood of Philadelphia. This activity also provides partial funding for case management for youth and their families to help overcome barriers to educational success and to access community resources to address family supportive service needs.

As part of the comprehensive neighborhood transformation strategy for the former Blumberg public housing development and the surrounding Sharswood community, PHA provides $500 per student per year in MTW Block Grant funds to support after school programming and case management services in coordination with a neighborhood school established in September 2017 serving youth in grades 9-12 which is operated by Big Picture Schools Philadelphia (BPSP) and located in the Vaux Community Building. BPSP works to engage students in learning and internship opportunities to encourage career exploration and progression to higher educations. The Vaux Community Building, a key part of the Choice Neighborhood Transformation Plan, serves as a focal point and anchor for the revitalized community, with on-site facilities for educational, health care and other supportive services. In FY 2019, PHA was designated by HUD as an EnVision Center. The new EnVision Center will be located in the Vaux Community Building. The plan to establish a neighborhood school and to improve educational outcomes is an integral component of the comprehensive Choice Neighborhoods Transformation Plan for Blumberg-Sharswood that was accepted by the US Department of Housing and Urban Development (HUD) in March 2016.

This MTW activity provides partial funding of BPSP's after school programs including homework assistance, sports activities, robotics, music production, computer refurbishing and other education-related activities. Partial funding is also provided for case management support to youth and their families through BPSP's Resilience Specialist. The Resilience Specialist provides one on one and group counseling to students and their families, with the goal of identifying and removing barriers to educational success and family stability.

PHA shares BPSP's goal of helping PHA and other low-income youth to exceed citywide educational metrics, and to graduate and move onto higher education and meaningful careers. PHA's intention is that the primary beneficiaries of the services provided by BPSP will be members of PHA resident households, including residents of public housing and the Housing Choice Voucher (HCV) program; however, other low-income neighborhood youth may be served. Upon full enrollment in the 2020-2021 year, the projected number of youth served will be 504.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Planned Significant Changes

No significant changes are planned.

B. Activities Not Yet Implemented

MTW Activity 2014-1: Flexible Subsidy Initiative

Description/Update

The Flexible Subsidy Initiative provides PHA with the flexibility, subject to HUD approval, to establish operating subsidy levels for newly constructed public housing units which blend MTW Block Grant funds (HAP and Operating Fund). This activity was approved by HUD in FY2014. PHA has not utilized this flexibility to date; however, it may be utilized, subject to HUD approval, in future transactions.

Timeline for Implementation

PHA will implement this activity if and when PHA needs MTW flexibility to supplement the current public housing operating subsidy levels, subject to prior HUD approval.

Explanation of Non-Significant Changes Since Approval

No changes have been made since approval.

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 that the activity no longer requires MTW authority to implement.

Activity	Plan Year	Close Out Year	Reason for Close Out
Assisted Living	FY 2009	FY 2011	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.
Home Care Services	FY 2009	FY 2011	PHA discontinued this activity prior to its implementation based on a determination that services can be delivered more efficiently through third-party partners.
Scattered Site Income Tiering	FY 2011	FY 2011	PHA discontinued this activity 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.
HCV Time Limit	FY 2004	FY 2012	PHA discontinued this activity due to economic conditions which limited the availability of jobs for residents.
HCV HQS Enforcement	FY 2004	FY 2012	PHA discontinued this policy based on a decision to establish uniform HQS enforcement policies for both MTW and Non-MTW vouchers.
Public Housing Service Order Policy	FY 2004	FY 2012	PHA discontinued this policy after discussions with the HUD Field Office concerning the need to expedite service order response times.
Tenant Responsibility Training	FY 2004	FY 2013	PHA determined that this activity does not require MTW flexibility to implement.
Blueprint	FY 2004	FY 2013	PHA continues to implement the Blueprint Program; however, a determination was made that the activity does not require MTW flexibility.
Transitional Housing Facilities	FY 2007	FY 2013	PHA determined that comparable activities are authorized under Partnership Initiative.
LIFE Program	FY 2007	FY 2013	PHA determined that this activity does not require MTW programmatic waivers or Block Grant funding.
Community Service Policy	FY 2011	FY 2013	PHA determined that this activity does not require MTW flexibility.
Expanding Use of LIHTC	FY 2011	FY 2013	PHA determined that the proposed activities were covered under Partnership and Unit-Based Leasing/Development Initiatives.
Family Economic Development Action Plan/Tenant Responsibility Training	FY 2004	FY 2014	PHA discontinued this activity along with discontinuation of HCV time limits as they were interrelated activities. No additional statutory exceptions outside of the current MTW flexibilities were considered.
Comprehensive Resident Self Sufficiency Services	FY 2005	FY 2014	PHA continues to provide comprehensive resident self-sufficiency services utilizing MTW Block Grant funds. However, MTW

Activity	Plan Year	Close Out Year	Reason for Close Out
			programmatic waivers are not required. These activities are now referenced in Chapter V under the Single Fund Flexibility section.
90 Day Voucher Reissuance Policy	FY 2005	FY 2014	PHA discontinued this policy based on an assessment that it would not contribute to PHA's utilization goals.
Accessible Unit Retrofitting and Development	FY 2010	FY 2014	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 waivers
Moving to Work Family Agreement Addendum	FY 2004	FY 2016	PHA elected not to utilize this Agreement and instead provides a Family Responsibilities form to each household at each regular recertification.
$20 Minimum Threshold for Utility Allowance Reimbursements	FY 2009	FY 2016	PHA elected not to establish a minimum threshold of $20 for payment of utility allowance payments.
Adult Day Care	FY 2011	FY 2017	PHA transitioned the program to a qualified third party provider, and does not provide MTW funding or utilize MTW waivers to support the activity.

V. SOURCES AND USES OF MTW FUNDS

A. Estimated Sources and Uses of MTW Funds

Tables 9 and 10 below provide estimated sources and uses of MTW funds for FY 2020. As PHA's funding levels for future periods are unknown, 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 2020 assumes continued reductions in Public Housing Operating Subsidy, Capital Fund Program, HCV, and HCV Administrative fees. The projected ongoing funding reductions compound the effects of decades of underfunding of the Operating Subsidy and Capital Fund programs. The tables follow HUD's required formats and do not include information on Non-MTW funding sources and uses. See also Appendix B for additional RHF-related information as required by the RHF Amendment to the MTW Agreement.

i. Estimated Sources of MTW Funds

Table 9: Estimated Sources of MTW Funding for FY 2020

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	$ 26,809,745
70600	HUD PHA Operating Grants*	$ 339,073,805
70610	Capital Grants	$ 56,001,017
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	$ 0
71100+72000	Interest Income	$ 100,000
71600	Gain or Loss on Sale of Capital Assets	$ 0
71200+71300+71310+71400+71500	Other Income	$ 6,400,000
70000	**Total Revenue**	$ 428,384,567

** This line item includes projected Public Housing Operating Fund and HAP revenue. Of the total amount listed, the Public Housing Operating Fund revenue is estimated at $117,760,396, HCV HAP revenue is estimated at $213,590,216 and $7,723,193 for RAD Subsidies.*

ii. Estimated Uses of MTW Funds

Table 10: Estimated Uses of MTW Funding for FY 2020

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+ 91800+91900)	Total Operating – Administrative	$ 58,707,900
91300+91310+92000	Management Fee Expense	$ 0
91810	Allocated Overhead	$ 0
92500(92100+92200+92300+92400)	Total Tenant Services	$ 2,926,499
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	$ 20,097,401
93500+93700	Labor	$ 159,748
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$ 68,083,440
95000 (95100+95200+95300+95500)	Total Protective Services	$ 8,571,226
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$ 14,517.561
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	$18,319,775
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	$ 0
97100+97200	Total Extraordinary Maintenance	$ 4,800,000
97300+97350	Housing Assistance Payments + HAP Portability-In	$ 181,000,000
97400	Depreciation Expense	$ 0
97500+97600+97700+97800 *	All Other Expenses	$51,201,017
90000	**Total Expenses**	$428,384,567

**This line item represents capital and development activity expenses.*

iii. Planned 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 development activities, and maintenance and site improvements throughout PHA.

- Family Programs 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. See Table 11 below for a summary of resident services initiatives planned for FY 2020 including MTW and Non-MTW funded initiatives.

- 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.

- Acquisition of properties, in cooperation with the Philadelphia Redevelopment Authority, for the Sharswood/Blumberg development project for use as replacement housing in that neighborhood and for other supportive neighborhood investments to revitalize commercial activity and improve educational outcomes of residents in the community in cooperation with strategic partners.

- Management directives associated with balancing and optimizing PHA's organization structure in line with HUD funding modifications related to the MTW agreement.

- Consolidation of PHA administrative offices, and tenant service centers in the Sharswood/Blumberg development for which bond financing under Section 30 is being utilized.

Table 11: Resident Services Program Summary for FY 2020

Program	Description	Target Population	Funding Source	Residents Served
ABE/GED	Adult Basic Education and General Equivalency Diploma education in the required domains.	Residents 18 to 55	MTW	32 residents will be served. 10 pass 1 or more tests. 5 pass 3 or more tests.
Afterschool	On site programs which provide: (1) homework assistance, (2) project based learning, (3) community service, and (4) physical/ body kinesthetic activities	Youth Ages 6 to 13	MTW	230
CHSP	Meal program to support appropriate nutrition and Health to	Residents 62 and over	HUD Grant, MTW	35

Program	Description	Target Population	Funding Source	Residents Served
	provide best practice fellowship to support aging in place.			
Community Partners	Occupational Skills training in career areas with reasonable growth potential.	Residents 18 to 55	MTW	100 enrolled
EnVision Center	EnVision Centers will provide communities with a centralized hub for support in the following four pillars: (1) Economic Empowerment, (2) Educational Advancement, (3) Health and Wellness, and (4) Character and Leadership	ALL	MTW, Other	150
Computer Lab	Access to computer technology for academic enrichment.	Residents 6 to 70	MTW	300 residents using computer labs
Connect Home	Bridging digital divide and providing internet access and equipment	Residents 6 to 70	MTW	2,500
Early Childhood Education Partnerships	Pre-School Partnerships to ensure 3 year olds are enrolled into area Head Start programs	Children 3 to 5	US Dept. of HHS	100
Financial Literacy	Credit and money management to enable residents to purchase homes.	Residents 18 to 55	MTW	150 enrolled
FSS	Assessment of individual and family needs, followed by referrals and tracking.	Residents 18 to 55	HUD Grant	300
Health & Wellness Programs	With Every Heartbeat There is Life, with a tobacco component to improve nutrition, exercise & Heart Health	Residents 18 to 70	MTW	125
Jobs Plus Pilot Program	Place-based employment program to increase earnings and employment of working-age residents	Residents 18 to 61	HUD Grant	390
ROSS Service Coordination	Assessment of individual and family needs, followed by referrals and tracking.	Residents 18 to 55	HUD Grant	200
ROSS SOAR	Assist PHA residents in applying for FASFA for financial assistance for college	Youth/Young Adults ages 15-20	HUD Grant	250
Section 3	Ensure that economic opportunities, are provided to PHA residents	Residents 18 to 55	Contracted vendors that meet the Section 3 threshold	74
Senior CTR/Programs	Evidence based activities, which reduce the number of seniors, who leave public housing to enter nursing homes.	Residents 60 and over	Philadelphia Corporation for Aging	130

Program	Description	Target Population	Funding Source	Residents Served
Smoke Free Housing	Provide smoke free cessation programs, including educational awareness workshops and other smoking cessation resources to help residents quit smoking	All	MTW, Philadelphia Department of Public Health, American Heart Association, Nursing Consortium	50 attendees
Summer Camp	Summer enrichment activities to prevent academic regression.	Youth Ages 6 to 13	MTW	280
Summer Food	Breakfast and lunch served on site to provide appropriate nutrition during the summer.	Youth 5 to 18	PA Department of Education, MTW	50,000 meals
Summer Jobs Program	Six weeks of summer employment for youth	Public and Assisted Housing Youth.	Philadelphia Youth Network Workready program, Partners, MTW	25

B. Local Asset Management Plan

Is the PHA allocating costs within statute?		or	No
Is the PHA implementing a local asset management plan (LAMP)?	Yes	or	
Has the PHA provided a LAMP in the appendix?	Yes	or	

Description of Proposed Changes to the Local Asset Management Plan in the Plan Year:

Pursuant to its MTW Agreement, PHA has developed a Local Asset Management Plan (LAMP) that describes the agency's cost allocation plan and other technical components of PHA's local asset management strategy. HUD approved PHA's initial LAMP as part of the MTW FY 2010 Annual Plan submission. PHA submits updates to the LAMP as part of the Annual Plan submission. No substantive changes are proposed to the LAMP for FY 2020. A copy of the current LAMP is found in Appendix C.

C. Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation

PHA views the conversion of public housing units to project-based assistance under the RAD program as a critically important component of its housing preservation and expansion strategy. Through RAD conversion, PHA is able to access private equity (primarily through the Low Income Housing Tax Credit program) and other funds to invest in existing PHA developments as well as to leverage new funding to replace obsolete scattered site units and "transfer assistance" to other new developments. Table 12 below provides summary information on PHA's current plans to convert existing public housing units to project-based assistance through the RAD program, and to transfer public housing assistance from vacant, non-viable scattered site units to new developments that will be subsidized through long-term project-based assistance contracts in FY 2020. For informational purposes, Table 13 includes those developments that PHA has converted through the RAD program, as well as the developments PHA expects to convert through the RAD program through the close of FY 2019, including transfer of assistance developments. Actual timetables for conversion and/or PHA's decision to proceed with conversion may vary from the information included below, depending on various factors including project feasibility determinations, project financing, timetables for HUD and other approvals and other factors.

The timetable for RAD conversions extends beyond FY 2020 and continues to be refined in consultation with HUD and PHA's resident leadership. The listed projects may be modified in the future, and are subject to approval by HUD and the PHA Board of Commissioners. PHA may apply for additional RAD conversions beyond those shown in Tables 12 and 13.

Table 12: RAD Conversions Planned in FY 2020

AMP #	Development Name	RAD Units	Description
PA2-014	Norris Apartments Phase V	45	Choice Neighborhood RAD conversion
PA2-015	Harrison Plaza	112	Conversion of tower in existing public housing development
PA2-039	West Park Apartments	327	Conversion of existing public housing development
PA2-093	Westpark Plaza	65	Conversion of existing public housing development
PA2-132	Suffolk Manor	137	Conversion of existing PAPMC public housing development
PA2-137	Cambridge I	44	Conversion of existing PAPMC public housing development
PA2-901-910	Scattered Sites AMPS	78	Transfer of assistance from vacant, uninhabitable scattered sites to 27th & Susquehanna for new development
PA2-901-910	Scattered Sites AMPS	50	Transfer of assistance from vacant, uninhabitable scattered sites to Beury building substantial rehab development
PA2-901-910	Scattered Sites AMPS	49	Transfer of assistance from vacant, uninhabitable scattered sites to Reynolds building substantial rehab development
PA2-901-910	Scattered Sites AMPS	22	Transfer of assistance from vacant, uninhabitable scattered sites to Harlan Street for new development

AMP #	Development Name	RAD Units	Description
	TOTAL	**1,005**	

**Westpark Plaza has 65 units available for occupancy, plus one additional off-line unit approved by HUD for use by the resident council.*

Table 13: RAD Conversions Completed or Projected to be Completed by End of FY 2019

Property Name	RAD Units	Description
2415 N. Broad	88	Transfer of Assistance
St John Neumann Place II	52	Transfer of Assistance
H.E.L.P Philadelphia V	37	Transfer of Assistance
New Courtland at St. Bartholomew	42	Transfer of Assistance
Lehigh Park I and II	49	Transfer of Assistance
Strawberry Mansion	55	Transfer of Assistance
Haddington III	48	Transfer of Assistance
Roberto Clemente House	38	Transfer of Assistance
Southwark Plaza (PA2-121)	470	Conversion of existing AME public housing development
Cantrell Place	40	Transfer of Assistance
Witherspoon Senior Apartments	40	Transfer of Assistance
1315 N. 8th Street	25	Transfer of Assistance
Norris Square Community Alliance Scattered Sites	29	Transfer of Assistance
Norris CNI	74	Choice Neighborhoods RAD Conversion
Plymouth Hall (PA2-079)	53	Conversion of existing public housing development
Blumberg Phase I	51	Transfer of Assistance
Blumberg Phase II-Senior Building	94	Conversion of existing public housing development
Norris Apartments Phase III	28	Choice Neighborhoods RAD Conversion
Susquehanna Square	37	Transfer of Assistance
Blumberg 83	83	Transfer of Assistance
TOTAL	**1,433**	

ii. RAD Significant Amendments

PHA is required to prepare a RAD Significant Amendment for each RAD project as part of the HUD approval process. The Significant Amendment process includes a public notice period, a public hearing and approval by the PHA Board of Commissioners prior to submission to HUD.

As part of this FY 2020 MTW Annual Plan, in Appendix H, PHA has included a RAD Significant Amendment which involves transfer of assistance from vacant, non-viable scattered site units to a new 78-unit new construction project to be developed by Susquehanna Net Zero Housing LP. Additional Significant Amendments for other planned RAD developments will be submitted in the future. Table 14 provides summary information on all previously submitted RAD Significant Amendments, including the HUD approval date for each.

Table 14: Previously Submitted RAD Significant Amendments

Plan Year	Date Submitted to HUD	HUD Approval Date	Property		Number of RAD Units	Transfer of Assistance (Yes/No)
			Pre-Conversion	Post-Conversion		
FY 2015	7/23/2015	7/27/2015	Phase 1 (Blumberg) (PA002000050)	Phase 1 (Blumberg) (PA002000050)	57[1]	Yes
FY 2016	1/27/2016	3/9/2016	Southwark Plaza (PA002000121)	Southwark Plaza (PA002000121)	470	No
			Haddington SS (PA002000901)	NewCourtland at Allegheny II[2]	40	Yes
			Oxford Jefferson SS (PA002000910)	2415 North Broad Street	88	Yes
			Germantown SS (PA002000904)	Roberto Clemente Homes	38	Yes
			Kingsessing SS (PA002000903)	HELP Philadelphia V	37	Yes
FY 2016	3/17/2016	3/30/2016	Ludlow SS PA002000907	Lehigh Park I	49	Yes
			Kingsessing SS PA002000903	Norris Square SS	29	Yes
			Scattered Sites (PA002000905, PA002000906, PA002000908,PA002000909, PA002000910)	Haddington III Preservation Initiative	48	Yes
			Scattered Sites (PA002000901, PA002000902, PA002000905,PA002000906, PA002000908, PA002000909, PA002000910)	St. John Neumann Place II	52	Yes
			Strawberry Mansion SS (PA002000909)	NewCourtland at St. Bartholomews	42	Yes
			Oxford Jefferson SS (PA00200910)	Strawberry Mansion	55	Yes
FY 2017	1/14/2016	07/06/2016	MLK I (PA002000128)	MLK I (PA002000128)	49	No
			MLK III (PA002000136)	MLK III (PA002000136)	45	No
			Eight Diamonds (PA002000126)	Eight Diamonds (PA002000126)	152	No
			Spring Garden II (PA002000162)	Spring Garden II (PA002000162)	32	No

[1] *# of RAD units in the Blumberg Phase 1 RAD Significant Amendment exceeds # of RAD units in final HAP Contract.*
[2] *Pursuant to PHA letter to HUD dated 1/27/2016, NewCourtland at Allegheny II withdrew from further consideration as a RAD site and accordingly, PHA does not intend to proceed with the transfer of assistance of 40 units at NewCourtland at Allegheny II.*

Plan Year	Date Submitted to HUD	HUD Approval Date	Property		Number of RAD Units	Transfer of Assistance (Yes/No)
			Pre-Conversion	Post-Conversion		
			Spring Garden Mixed Finance (PA002000127)	Spring Garden Mixed Finance (PA002000127)	86	No
FY 2017	8/02/2016	9/06/2016	Norris Apartments II (PA002000014)	Norris Apartments II (PA002000014)	147	Yes
			Plymouth Hall (PA002000079)	Plymouth Hall (PA002000079)	53	Yes
FY 2018	1/15/2017	4/23/2017	Westpark Plaza (PA002000093)	Westpark Plaza (PA002000093)	65	No
			Blumberg Senior (PA002000050)	Blumberg Senior (PA002000050)	94	No
FY 2018	4/25/2017	6/14/2017	Scattered Sites (PA002000904, PA002000906)	Cantrell Place	40	Yes
			Scattered Sites (PA002000906, PA002000907, PA002000909)	Witherspoon	40	Yes
			Scattered Sites (PA002000905, PA002000910)	Reynolds School	64	Yes
			Scattered Sites (PA002000908)	Beury Building	50	Yes
			Scattered Sites (PA002000902)	1315 North 8th Street	25	Yes
FY 2019	0/12/2018	04/28/2018	Scattered Sites (PA002000909)	Harlan Street	22	Yes
			Scattered Sites (PA002000902,904,905,907,908,909)	Susquehanna Square	37	Yes
			Scattered Sites (PA002000901,902,903)	Walton School	44	Yes
			Scattered Sites (PA002000901,902,903,904,905,906,907,908,909)	Blumberg Phase III	83	Yes

VI. ADMINISTRATIVE

A. Board Resolution and Certifications of Compliance

A Resolution approving the FY 2020 MTW Annual Plan and the MTW Plan Certification of Compliance was adopted by the PHA Board of Commissioners at the December 2018 meeting following the public review process and public hearing. The Resolution is included in Appendix A.

B. Documentation of Public Process

PHA provided public notice of the FY 2020 MTW Annual Plan and posted the Plan on its website. A thirty-day public comment period to allow for resident and general public review was provided from November 1, 2018 through December 3, 2018. A public hearing was held on November 27, 2018 at 1800 South 32nd Street, an accessible facility, attended by one member of the public in addition to PHA staff. PHA also conducted a meeting on November 14, 2018 with resident leadership to discuss proposed Plan contents and provide additional opportunities for resident input. Approximately 41 residents attended the November 14 meeting.

C. Planned and Ongoing Evaluations

PHA's most recent impact analysis of its rent simplification efforts is included in Appendix G.

D. Lobbying Disclosures

The required Disclosure of Lobbying Activities (SF-LLL) and Certification of Payment (HUD-50071) forms are included in Appendix A.

VII. APPENDICES

Appendix A: Board Resolution, MTW Certification & Lobbying Disclosures

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 2020

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.)

2013 Ridge Avenue, Philadelphia, PA 19121 and all PHA sites

Check here [x] 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 1/8/19

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

DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB
0348-0046

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

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 2020 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: Kelvin A. Jeremiah Print Name: Kelvin A. Jeremiah Title: President & CEO Telephone No.: 215-684-4174 Date: _____	
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 2020

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: Kelvin A. Jeremiah	Date (mm/dd/yyyy): 1/8/19

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: Kelvin A. Jeremiah

Date: 1/8/19

OMB Control Number: 2557-0216
Expiration Date: 01/31/2021

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 Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (04/01/2019), 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 MTW 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 MTW PHA conducted a public hearing to discuss the Plan and invited public comment.

(2) The MTW 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 MTW 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 (or successor form as required by HUD).

(4) The MTW 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 MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.

(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.

(10) The MTW 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.

(11) The MTW 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.

(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

(13) The MTW 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

HUD FORM 50900: Certifications of Compliance

accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

(14) The MTW 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.

(15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

(16) The MTW 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 MTW 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.

(17) With respect to public housing and applicable local, non-traditional development the MTW 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.

(18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

(19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

(20) The MTW 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 200.

(21) The MTW 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.

(22) 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 MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Philadelphia Housing Authority	***PA002***
MTW PHA NAME	***MTW 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	12-20-18 ***DATE***

* ***Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW 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.***

HUD FORM 50900: Certifications of Compliance

RESOLUTION NO. 12025

RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY TO SUBMIT ITS MOVING TO WORK ANNUAL PLAN ("PLAN") FOR FISCAL YEAR 2020, INCLUDING RENTAL ASSISTANCE DEMONSTRATION PROGRAM SIGNIFICANT AMENDMENTS, TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT ("HUD") AND TO UNDERTAKE 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 the 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, as detailed in Resolution 11577, adopted by the Board on January 11, 2013; 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 and distributed to the Board the MTW Annual Plan for Fiscal Year 2020 ("Plan"), beginning on April 1, 2019, a summary of which is attached hereto as Attachment "A," which includes the Rental Assistance Demonstration Program Significant Amendments for One (1) transfer of assistance development, and a consolidated budget, in accordance with the current MTW Agreement, as PHA is a block grant agency; and

WHEREAS, PHA has fulfilled the HUD requirement of providing opportunities for resident and public participation and comment on the 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 14, 2018; 2) holding a Public Hearing on November 27, 2018; 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 extending from November 1, 2018 to December 3, 2018;

BE IT RESOLVED that the Board of Commissioners hereby approves the MTW Annual Plan for Fiscal Year 2020, including the Rental Assistance Demonstration Significant Amendment incorporated therein, in substantially the form distributed to the Board, and authorizes PHA's Chair and/or President & CEO or their authorized designee(s) to: 1) submit to HUD the PHA MTW Annual Plan for Fiscal Year 2020; 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 12/20/18
Laurie M. Cedrone
ATTORNEY FOR PHA

OMB Approval No 2506-0112 (Exp 12/31/2018)

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 Con solidated Plan. (Type or clearly print the following information:)

Applicant Name: Philadelphia Housing Authority

Project Name: PHA - Moving to Work Annual Plan FY 2020

Location of the Project: The development and implementation of affordable housing and economic development initiatives in Philadelphia in accordance with the City's Consolidated Plan and Assessment of Fair Housing

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

Name of Certifying Jurisdiction: City of Philadelphia, Division of Housing and Community Development

Certifying Official of the Jurisdiction Name: Melissa Long

Title: Director of DIvision of Housing & Community Development

Signature:

Date: 01/03/2019

Page 1 of 1

form HUD-2991 (3/98)

Appendix B: Replacement Housing Factor Funds

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 2020 are included in the Sources and Uses tables of the Plan.
- PHA intends to combine all 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 proportionality 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, Option 3.
- 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
2017	PA01R00250117	08/16/2019	08/16/2021
2017	PA01R00250217	08/16/2019	08/16/2021
2016	PA01R002501-16	04/12/2018	04/12/2020
2015	PA26R002501-15	10/29/2019	10/29/2021
2015	PA26R002502-15	10/29/2019	10/29/2021
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

Appendix C: 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 has implemented a local asset management plan for its Public Housing Program as described herein. In the implementation of the plan, PHA will continue to adopt cost accounting and financial reporting methods that comply with HUD and federal regulations 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 Property Managers assigned to each property. PHA Property 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 Public Safety, Maintenance, Development, ISM, Finance and Budget, Human Resources, Community Operations & Resident Development, Office of General Counsel, Supply Chain Management, and the Office of Audit and Compliance support PHA Property Managers. Property Managers have access to on-line detailed and summary management reports on budget status, waitlist management, key performance indicators to facilitate their monitoring and oversight of property level activities. PHA also conducts Performance Management meetings on a monthly basis, to allow for a thorough review of key performance indicators at the individual site and system-wide levels.

PHA Property 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. Property 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 costlier 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 follows:

I. AMP Definitions

An AMP will include any site that receives Operating Subsidies through HUD's Operating Fund Calculation. PHA currently has two types of PHA managed AMPs and PAPMC/AME managed AMPs.

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

PHA has distributed balance sheet accounts by AMPs as planned in the original Local Asset Management balance sheet accounts were analyzed and distributed to between the AMPs and the Indirect Cost Departments.

A. Cash & Investments

PHA maintains consolidated physical bank accounts, but for financial statement and general ledger presentation cash is distributed between all PHA AMPs and the Indirect Cost Departments. Direct cash and expenses are charged to the proper AMPs or Indirect Cost Departments general ledger account. At the end of the year, cash is adjusted to offset indirect cost allocations between the AMPs and the Indirect Cost Departments. The offsetting of the indirect cost allocations effectively adjusts the inter fund balances to zero accept where the AMPs have a negative cash balance which is presented as an inter-fund to the Indirect Cost Departments. All remaining cash and investment balances are presented with the Indirect Cost Departments and reported in the MTW Column of the FDS.

Investment income will be allocated between the PHA Managed AMPs based on the number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation.

B. Tenant Accounts Receivable and Allowance for Doubtful Accounts

Tenant accounts receivable balances and allowance for doubtful accounts are reported on an AMP basis for each of the PHA Managed AMPs. The ending balances are reconciled to the tenant supporting detail ledgers,

PAPMC/AME Managed AMPs tenant balances are not reported as AMPs in the FDS. Based on PHA's analysis of GASB pronouncements, these AMPs are presented as discrete component units. Tenant accounts receivable and allowance for doubtful accounts are included in the PHA Audited financial statements as a 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 / Worker's Compensation Cash and Liabilities

The PHASI and Worker's Compensation cash and liabilities will remain with the Indirect Cost Departments and reported in the MTW column of the FDS. 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. The expenses related to the PHASI liability and worker's compensation liability are charged to appropriate programs or AMPs. PHA has created a cash reserve for the PHASI liability. The cash reserve offsets PHA's liabilities so that the liability is fully funded. PHA utilizes the reserves to pay the liability as needed. PHA has a cash reserve that is held by the Worker's Compensation insurer.

E. Prepaid Insurance

The prepaid insurance balances for the PHA Managed AMPs will be distributed to AMPs based on the number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation.

PAPMC/AME Managed AMPs will not be included in the AMPs Columns of the FDS. Prepaid insurance is included in the PHA Audited financial statements as a discretely presented component unit.

F. Materials Inventory and Allowance for Obsolete Inventory

PHA currently maintains all maintenance materials inventory centrally. AMPs and departments submit requests for inventory and materials are issued then expenses are charged to the appropriate AMP or program. Ending centralized materials inventory and allowance balances for the PHA Managed AMPs will be distributed to AMPs based on the number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation.

PAPMC/AME Managed AMPs will not be included in the AMPs Columns of the FDS. Materials inventory is included in the PHA Audited financial statements as a discretely presented component unit.

G. Fixed Assets and Accumulated Depreciation

Fixed assets and accumulated depreciation will be reconciled to the PeopleSoft Asset Module and distributed to the appropriate PHA Managed AMPs and the Indirect Cost Departments. PHA's Asset Management (AM) Module 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 fixed assets transactions and records all monthly fixed asset entries. Fixed assets and accumulated depreciation are reported with the appropriate AMP or the MTW Column for assets held by the Indirect Cost Departments.

PAPMC/AME Managed AMPs will not be included in the AMPs Columns of the FDS. Fixed assets and accumulated depreciation are included in the PHA Audited financial statements as a discretely presented component unit.

H. Accounts Payable and Accrued Liabilities

Other accounts payable and accrued liabilities include all liabilities not specifically referred to in the following detailed liability categories. Other accounts payable and accrued liabilities will be 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 will be distributed to the Indirect Cost Departments.

I. Payroll Liabilities

All payroll tax and benefits liabilities will continue to be presented with the Indirect Cost Departments and reported in the MTW Column of the FDS. 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) will receive reimbursements from other programs where applicable. The expenses related to the payroll liabilities will continue to be charged to appropriate programs or AMPs.

Accrued salaries and wages liability will be distributed to/ between AMPs based on the number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation.

J. Compensated Absences

Compensated absences liabilities will be distributed to/between the PHA Managed AMPs based on the number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation.

No compensated absences liabilities will be distributed to the PAPMC / AME AMPs because PHA does not charge salaries to these AMPs.

K. Net Position

Invested in Capital Assets balances 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 is distributed.

The Public Housing Program Unrestricted Net Position for all AMPs will be zero because PHA will allocate revenue from the MTW Column to cover the difference between revenues and expenses generated by each AMP. The total Unrestricted Net Position of the Public Housing Program will be included with the MTW Column.

PAPMC/AME Managed AMPs will not be included in the AMPs Column of the FDS. Invested in capital assets are included in the PHA Audited financial statements as a discretely presented component unit. PAPMC/AME Managed AMPs will not be included in the AMPs Column of the FDS. Unrestricted net assets are included in the PHA Audited financial statements as a 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 AMPs Column of the FDS. Tenant revenue is included in the PHA Audited financial statements as a 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 AMPs Column of the FDS. Direct revenues are included in the PHA Audited financial statements as a 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 number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation.

D. HUD Operating Subsidy

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.

Operating Subsidy will be allocated to all PHA AMPs based on the difference between revenues, prior to operating subsidy, and expenses excluding depreciation expenses. The amount of Operating Subsidy allocated will be based on the individual AMPs need for subsidy so that revenues are equal to expenses.

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 based on the number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation. PHA will establish separate account numbers for the MTW and 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'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 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 were used.

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 AMPs FDS column are PHA's payment of Operating Subsidies and any other direct expense paid by PHA. All other direct expenses are included in the PHA Audited financial statements as a 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

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 based on the number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation.

C. 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 were used.

D. 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.

E. Indirect Expenses

PHA will be using an allocation to charge overhead from the Indirect Cost Departments (MTW Column) to all AMPs. Overhead costs will be allocated to the AMPs based the number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation.

V. Capital Fund Program

All expenditures under the Capital Fund program are charged to the appropriate AMP or Indirect Cost Department. Revenues are applied to the appropriate AMP or Indirect Cost Department based on the actual expenditures. The expenditures related to the Indirect Cost Departments or MTW initiatives are reported in the MTW Column of the FDS.

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.

VI. Project Based Budgeting

PHA currently prepares project based operating budgets for all the Amps and departments. PHA adds all the budgets to the Automated Accounting System. The operating budgets are currently used in the procurement, accounts payable process and the preparation of monthly financial statements. 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.

Appendix D: Asset Management Table

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	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, administrative facilities 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 Choice/RAD 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	Intent for RAD Conversion	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD 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.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Bentley Hall PA002077	100 Elderly Units		As part of Sharswood Blumberg revitalization, possible façade improvements.		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.	
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 RD and/or PHA wholly-owned subsidiary and/or private entities.	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 to purchase, conventional sale and Housing Choice vouchers.
Cambridge Plaza Phase I PA-002137	44 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.				
Cambridge Plaza Phase II PA-	40 LIHTC Rental Units		Potential for refinancing, re-syndication, change				

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
002129			of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.				
Cambridge Plaza Phase III Phase I PA002147	40 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.				
Cassie Holly (Point Breeze Court) PA002062	71 Elderly Units	Security Upgrades done	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD 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 candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD 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.	

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
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	As part of Sharswood Blumberg revitalization, possible façade improvements	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD 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.	
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 entities.	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 to purchase, conventional sale and Housing Choice vouchers.
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,	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and	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 to purchase, conventional sale and Housing Choice vouchers.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.			
Eight Diamonds PA00126 PA00141 (Formerly known as Raymond Rosen Off-Site PA002126)	Phases A & B; 152 Family		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. Potential for conversion to project based assistance under RAD.	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 entities.		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 to purchase, conventional sale and Housing Choice vouchers.
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			Possible demolition in connection with modernization and revitalization, and possible disposition in		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management	

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				connection with mixed-finance development. Additional disposition applications and conveyances to RD and/or PHA wholly-owned subsidiary and/or private entities.		offices, community and supportive services offices and/or open space.	
Falls Ridge PA002130	135 LIHTC Rental Units		Development partner for vacant land.	Possible disposition of vacant land			
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 entities.	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 to purchase conventional sale and Housing Choice vouchers.
Germantown House PA002152	133 Units	Planned renovation and leasing of adult care space. Potential for refinancing, re-syndication, change of entity ownership related to end			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.	

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
		of initial LIHTC compliance period.					
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.	Water penetration repairs done	Possible mixed-finance development and commercial development including community building on PHA vacant lots and public parcels. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.	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,	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.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			private funds with Choice/RAD and/or LIHTC Application.				
Harrison Plaza PA002015	300 Family High and Low Rise	Intent for RAD Conversion	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice/RAD 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 Choice/RAD 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 Choice/RAD 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	334 Family		Possible candidate for			Possible conversion of units/parcels for residential unit reconfiguration and	

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
& II PA002029			modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.			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 Choice/RAD 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	Master planning for historic renovations and modernization.	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD 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		59 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and	

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.			commercial, economic development, management offices, community and supportive services offices and/or open space.	
Lucien E. Blackwell Homes Phase I PA002145	80 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.				
Lucien E. Blackwell Homes Phase II PA002150	80 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.				
Lucien E. Blackwell Homes Phase III PA002153	50 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project				

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			based assistance under RAD.				
Lucien E. Blackwell Homes Phase IV (Marshall Shepard Village) PA002156	80 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.				
Ludlow HOPE 6 Area Scattered Sites PA #s: PA002154	Phases I, II, III, IV & V; 75 LIHTC and 103 Homeownership units		Development completed. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.				
Mantua Hall PA002045	152 Family High-Rise Units	Water penetration repairs and leasing of commercial spaces.					
Martin Luther King Plaza PA002036 New PA#s: PA002128 PA002136	Phases I, II, III, IV, V & VI; 136 LIHTC Rental Units and 109		All Phases completed. New construction of 19 market rate homeownership units on a portion of	Possible disposition in connection with mixed- finance development and/or other sale transactions			109 Homeownership Units. HOPE VI HO Middle income Program essential elements of Nehemiah, USHA of 1937.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
PA002149	Replacement Homeownership Units.		the site. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.	to City and private developers.			
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 to 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	Possible demolition in connection with modernization and revitalization.			Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease to purchase conventional sale and Housing Choice vouchers.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			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.				
Morton Homes PA002049	65 Units	Planned electrical upgrades as part of the Better Building Challenge.	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD 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. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.		161 Elderly Units		

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Nellie Reynolds Garden PA002158	64 Elderly housing units.		Development completed. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.		64 Elderly housing designation.		
Neumann North PA002148	67 LIHTC Rental Units		Potential for conversion to project based assistance under RAD.		67 Elderly Units Designated		
Norris Apartments PA002014	157 Family High Rise, 68 Family Low-Rise	RAD Choice Neighborhood Redevelopment	Modernization, rehabilitation, revitalization, which will include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds. PHA will use Choice Neighborhood and/or LIHTC Application when available.	Possible demolition in connection with the 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.	Homeownership component in connection with potential modernization and revitalization.
Oak Lane	100 Rental Units		Possible scattered sites acquisition. Acquisition, new development and rehabilitation of housing stock along with neighborhood	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance	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	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease to purchase conventional sale and

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			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.	development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.		supportive services offices and/or open space.	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 Choice/RAD and/or LIHTC Application.	Possible demolition I 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		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.		Possible Elderly Designation		Possible homeownership component

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Plymouth Hall PA002079	53 senior high-rise	RAD conversion completed	Rehabilitation with capital funds to develop 53 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.	
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 RD and/or PHA wholly-owned subsidiary and/or private entities.	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 to purchase conventional sale and Housing Choice vouchers.
Raymond Rosen On-Site PA002010	356 Family						
Richard Allen Homes Phase III PA002133	178 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of				Includes 15-year tax credit and lease to purchase homeownership components.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			initial LIHTC compliance period. Potential for conversion to project based assistance under RAD.				
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, for affordable housing or transfer to Land Bank	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. Possible PHA affordable homeownership program.
Scattered Sites PA002000906	412 Family Units	Intent for RAD Conversion - 69 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	Possible demolition/disposition of non-viable units and imminently dangerous properties 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.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.				
Scattered Sites PA002000907	958 Family Units	Intent for RAD Conversion - 85 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 Choice/RAD, Choice Neighborhood,	Possible demolition/disposition of non-viable units and imminently dangerous properties 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 USH of 1937.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			LIHTC, RACP and any other state and city funding sources when available.				
Scattered Sites PA002000908	14 Family Units	Intent for RAD Conversion - 104 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 Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units and imminently dangerous properties 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	Intent for RAD TOA 13 units known, potential	Possible development, rehabilitation of existing buildings,	Possible demolition/disposition of non-viable units and imminently		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic	Section 32 of USHA of 1937. Possible homeownership component in

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
		additions being considered	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 Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	dangerous properties for neighborhood redevelopment activity.		development, management offices, community and supportive services offices and/or open space.	connection with potential modernization and revitalization.
Scattered Sites PA002000902	21 Family Units	Intent for RAD TOA 27 units known, potential additions being considered	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-	Possible demolition/disposition of non-viable units and imminently dangerous properties 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.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.				
Scattered Sites PA002000903	988 Family Units	Intent for RAD TOA 17 units known, potential additions being considered	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	Possible demolition/disposition of non-viable units and imminently dangerous properties 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.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.				
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 Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and	Possible demolition/disposition of non-viable units and imminently dangerous properties 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.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			city funding sources when available.				
Scattered Sites PA002000905	173 Family Units	Intent for RAD TOA 35 units known, potential additions being considered	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 Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units and imminently dangerous properties 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	Intent for RAD TOA 34 units known, potential additions being considered	Possible development, rehabilitation of existing buildings, demolition of existing buildings,	Possible demolition/disposition of non-viable units and imminently dangerous properties for neighborhood		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and	Section 32 of USHA of 1937.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			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 Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	redevelopment activity.		supportive services offices and/or open space.	
Scattered Sites PA002000910	514 Family Units	Intent for RAD TOA 25 units known, potential additions being considered	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	Possible demolition/disposition of non-viable units and imminently dangerous properties 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.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.				
Sharswood Area Condemnation	1300 parcels to acquired	Complete condemnation process and pay just compensation to owners.	Land assembly activities to support revitalization activities in the Blumberg area. Activities to include demolition, disposition and new construction activities by PHA and/or Development Partners. Complete URA relocation of owners and tenants of condemned property.	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.
South Phila area planning	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with	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	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease to purchase, conventional sale and

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			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.	mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.		supportive services offices and/or open space.	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 entities.	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 to 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 Choice/RAD 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.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
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 entities.	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 to purchase, conventional sale and Housing Choice vouchers.
Spring Garden Revitalization: Phase 1 PA002127	84 LIHTC Rental Units		Potential for conversion to project based assistance under RAD.				
Spring Garden Revitalization: Phase 2 PA002162	58 LIHTC Units 32 ACC units		Mixed-finance development by third party developer. Potential for conversion to project based assistance under RAD.	Disposition of scattered site properties for new development.			
St Anthony's Senior Residence: PA002131	38 Elderly LIHTC Units		Potential for conversion to project based assistance under RAD.		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		

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Suffolk Manor PA002132	137 LIHTC Rental Units		Possible major exterior envelope and air conditioner heating system to be improved. Potential for conversion to project based assistance under RAD.		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 entities.		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. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period. Potential for conversion to project				

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			based assistance under RAD.				
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. Potential for conversion to project based assistance under RAD.		45 Elderly housing designation.		
West Park Plaza PA002093	66 Units	Intent for RAD Conversion	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD 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	Market West to be planned and begin acquisition activities.	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	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-	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 to purchase, conventional sale and Housing Choice vouchers.

Name, Number and Location	Number and Type of Units	Note for FY 2020 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			and/or Capital Funds to develop units.	owned subsidiary and/or private entities.			
Westpark Apartments PA002039	325 Family High-Rise Units	Intent for RAD Conversion	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD 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.				
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 Choice/RAD 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.	
Walton School		Now an ACC deal	Redevelopment into Senior Housing.				
Reynolds School			Redevelopment of Vacant School in Sharswood Neighborhood.				

Appendix E: Planned Demo/Dispo Additional Documentation

Listed below are scattered sites units which are planned for demolition and/or disposition in FY 2020 or subsequent periods. PHA may modify this listing in the future. Approvals by the PHA Board of Commissioners and HUD are required in order to proceed with demolition/disposition activities.

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
RAD Transfer of Assistance Units					
041691	PA002000901	4920 PARRISH ST	19139		4
125875	PA002000901	228 N CECIL ST	19139		3
589279	PA002000901	232 N 58TH STREET	19139		3
609339	PA002000901	150 N 58TH STREET	19139		3
609345	PA002000901	220 N 56TH STREET	19139		3
609353	PA002000901	239 N RUBY ST	19139		3
609407	PA002000901	6125 RACE ST	19139		3
609421	PA002000901	55 N CONESTOGA ST	19139		3
609429	PA002000901	27 N PEACH ST	19139		3
690696	PA002000901	4916 PARRISH ST	19139		4
690813	PA002000901	4825 PARRISH ST	19139		3
888795	PA002000901	5306 RACE ST	19139		4
888871	PA002000901	44 N 58TH STREET	19139		3
041839	PA002000902	3606 MELON ST	19104		6
041960	PA002000902	3932 WALLACE ST	19104		3
041985	PA002000902	3818 HAVERFORD AVE	19104		3
042269	PA002000902	614 N 38TH STREET	19104		5
042312	PA002000902	4167 MANTUA AVE	19104		5
042394	PA002000902	619 N 39TH STREET	19104		5
042753	PA002000902	3841 BRANDYWINE ST	19104		3
043490	PA002000902	768 N 38TH STREET	19104		5
124861	PA002000902	3866 OLIVE ST	19104		3
125272	PA002000902	3850 BROWN ST	19104		5
125398	PA002000902	3853 ASPEN ST	19104		3
125469	PA002000902	4203 OGDEN ST	19104		3
125692	PA002000902	3843 WYALUSING AVE	19104		3
125789	PA002000902	763 N 37TH STREET	19104		2
125795	PA002000902	3608 WALLACE ST	19104		5
125851	PA002000902	612 N 39TH STREET	19104		6
125889	PA002000902	853 N 45TH STREET	19104		3
125902	PA002000902	746 N 38TH STREET	19104		3
690542	PA002000902	3921 FOLSOM ST	19104		3
691106	PA002000902	3825 BROWN ST	19104		4
691378	PA002000902	744 N 38TH STREET	19104		3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
804109	PA002000902	610 UNION ST	19104		5
818055	PA002000902	766 N DEKALB ST	19104		3
818124	PA002000902	926 N 43RD STREET	19104		3
818186	PA002000902	628 N 37TH STREET	19104		5
818302	PA002000902	4223 W STILES ST	19104		5
818391	PA002000902	3828 ASPEN ST	19104		3
857199	PA002000903	1432 S 56TH STREET	19143		3
857325	PA002000903	1923 S REDFIELD ST	19143		3
857339	PA002000903	1925 S REDFIELD ST	19143		3
857370	PA002000903	1705 S CONESTOGA ST	19143		2
857436	PA002000903	2114 S FRAZIER ST	19143		4
857437	PA002000903	1913 S BONSALL ST	19145		3
857453	PA002000903	2026 S CECIL ST	19143		3
857530	PA002000903	5722 PENTRIDGE ST	19143		3
857532	PA002000903	2124 S SHIELDS ST	19142		3
857554	PA002000903	5722 WINDSOR AVE	19143		3
888569	PA002000903	1546 S WILTON ST	19143		3
888734	PA002000903	1521 S PATTON ST	19146		3
888897	PA002000903	5733 BEAUMONT ST	19143		3
888927	PA002000903	1350 S WILTON ST	19143		3
916108	PA002000903	5712 BELMAR TERRACE	19143		3
976173	PA002000903	5508 WINDSOR ST	19143		3
976185	PA002000903	1011 S ITHAN ST	19143		3
041526	PA002000905	1929 N 05TH STREET	19122		6
041661	PA002000905	2535 N 07TH STREET	19133		4
041936	PA002000905	2415 N LAWRENCE ST	19133		4
042452	PA002000905	2208 N 05TH STREET	19133		6
042697	PA002000905	2040 N 05TH STREET	19122		4
042895	PA002000905	2416 N LEITHGOW ST	19133		2
043064	PA002000905	2119 N 05TH STREET	19122		4
043134	PA002000905	2332 N 05TH STREET	19133		4
043135	PA002000905	2339 N 05TH STREET	19133		4
043635	PA002000905	1929 N 04TH STREET	19122		5
124819	PA002000905	1550 N LAWRENCE ST	19122		4
124876	PA002000905	2143 N 05TH STREET	19122		3
125123	PA002000905	319 W NORRIS ST	19122		4
125264	PA002000905	2138 N ORKNEY ST	19122		2
125275	PA002000905	2544 N 09TH STREET	19133		3
125290	PA002000905	1754 N 03RD STREET	19122		4
125317	PA002000905	2150 N 05TH STREET	19122		5
125489	PA002000905	1914 MUTTER ST	19122		2

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
125527	PA002000905	1933 N 04TH STREET	19122		5
125747	PA002000905	2514 N FRANKLIN ST	19133		3
125872	PA002000905	2427 N LAWRENCE ST	19133		4
255963	PA002000905	2237 N 04TH STREET	19133		5
690159	PA002000905	2451 N 05TH STREET	19133		5
690208	PA002000905	2631 N FRANKLIN ST	19133		3
690211	PA002000905	1921 N 05TH STREET	19122		4
690778	PA002000905	2538 N MARSHALL ST	19133		3
691054	PA002000905	2527 N FRANKLIN ST	19133		3
691107	PA002000905	2537 N 07TH STREET	19133		5
691246	PA002000905	416 W NORRIS ST	19122		6
691384	PA002000905	2155 N 05TH STREET	19122		5
691454	PA002000905	2016 N LAWRENCE ST	19122		4
804492	PA002000905	2032 N 05TH STREET	19122		3
818224	PA002000905	1842 N 04TH STREET	19122		5
926754	PA002000905	2526 N LAWRENCE ST	19133		3
926791	PA002000905	2434 N 04TH STREET	19133		2
041565	PA002000908	2070 W GLENWOOD AVE	19132		4
041637	PA002000908	3023 W SUSQUEHANNA AVE	19121		5
041706	PA002000908	2344 N OPAL ST	19132		3
041920	PA002000908	1426 W YORK ST	19132		6
041977	PA002000908	1921 W DAUPHIN ST	19132		5
042122	PA002000908	2248 N 17TH STREET	19132	A	2
042123	PA002000908	2248 N 17TH STREET	19132	B	4
042363	PA002000908	2129 W DAUPHIN ST	19132		5
042444	PA002000908	2644 N 29TH STREET	19132		6
042825	PA002000908	2230 N 17TH STREET	19132	A	2
042826	PA002000908	2230 N 17TH STREET	19132	B	5
042956	PA002000908	2220 N 17TH STREET	19132	A	2
042957	PA002000908	2220 N 17TH STREET	19132	B	5
125056	PA002000908	2343 N 20TH STREET	19132		6
125592	PA002000908	2247 N 17TH STREET	19132		6
125654	PA002000908	2539 W HAROLD ST	19132		3
125698	PA002000908	1625 W HUNTINGDON ST	19132		5
125873	PA002000908	2315 N VAN PELT ST	19132		3
255945	PA002000908	2406 N 15TH STREET	19132		5
255971	PA002000908	2258 N 17TH STREET	19132		6
690007	PA002000908	2524 N 16TH STREET	19132		4
690106	PA002000908	2334 N OPAL ST	19132		3
690109	PA002000908	2246 N BANCROFT ST	19132		3
690110	PA002000908	2356 N VAN PELT ST	19132		3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
690118	PA002000908	2319 N CLEVELAND ST	19132		3
690135	PA002000908	2444 N GARNET ST	19132		3
690412	PA002000908	2269 N COLORADO ST	19132		3
690558	PA002000908	2342 N 18TH STREET	19132		4
690565	PA002000908	2209 N COLORADO ST	19132		3
690573	PA002000908	2531 N BOUVIER ST	19132		3
690593	PA002000908	2645 N COLORADO ST	19132		3
690722	PA002000908	2452 N NATRONA ST	19132		3
690777	PA002000908	2525 N COLORADO ST	19132		3
690899	PA002000908	2355 N VAN PELT ST	19132		3
690904	PA002000908	2513 N COLORADO ST	19132		3
690957	PA002000908	2046 W GLENWOOD AVE	19132		4
690986	PA002000908	2444 N COLORADO ST	19132		3
691027	PA002000908	2327 N COLORADO ST	19132		3
691040	PA002000908	2560 N SYDENHAM ST	19132		3
691135	PA002000908	2619 N CORLIES ST	19132		3
691163	PA002000908	2469 N COLORADO ST	19132		3
691296	PA002000908	2511 N NAPA ST	19132		3
804769	PA002000908	2260 N 17TH STREET	19132		6
818004	PA002000908	2323 N COLORADO ST	19132		3
818126	PA002000908	2614 N 16TH STREET	19132		5
818151	PA002000908	2528 N NATRONA ST	19132		3
818230	PA002000908	2455 N BOUVIER ST	19132		3
818314	PA002000908	2605 N STANLEY ST	19132		3
818342	PA002000908	2232 N 17TH STREET	19132		6
818411	PA002000908	2513 N MARSTON ST	19132		3
818526	PA002000908	2225 N BANCROFT ST	19132		3
857240	PA002000908	2324 N COLORADO ST	19132		3
926743	PA002000908	2347 N CLEVELAND ST	19132		3
926767	PA002000908	2403 W OAKDALE ST	19132		4
041816	PA002000909	2933 WESTMONT ST	19121		2
041907	PA002000909	2841 DIAMOND ST	19121	A	2
041908	PA002000909	2841 DIAMOND ST	19121	B	6
042030	PA002000909	2104 N 16TH STREET	19121	A	3
042031	PA002000909	2104 N 16TH STREET	19121	B	3
042032	PA002000909	2104 N 16TH STREET	19121	C	1
042810	PA002000909	2117 N 15TH STREET	19121	A	3
042811	PA002000909	2117 N 15TH STREET	19121	B	3
042812	PA002000909	2117 N 15TH STREET	19121	C	3
043472	PA002000909	2020 N BAMBREY ST	19121	A	3
043473	PA002000909	2020 N BAMBREY ST	19121	B	3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
043511	PA002000909	1803 N 18TH STREET	19121	A	3
043512	PA002000909	1803 N 18TH STREET	19121	B	3
043513	PA002000909	1803 N 18TH STREET	19121	C	3
690070	PA002000909	1816 N NEWKIRK ST	19121		3
690515	PA002000909	1824 N BUCKNELL ST	19121		3
690516	PA002000909	1802 N BUCKNELL ST	19121		3
690517	PA002000909	1804 N BUCKNELL ST	19121		3
690524	PA002000909	1825 N BUCKNELL ST	19121		3
690525	PA002000909	1847 N BUCKNELL ST	19121		3
690526	PA002000909	1821 N BUCKNELL ST	19121		3
690541	PA002000909	1843 N BUCKNELL ST	19121		3
690851	PA002000909	2151 N NATRONA ST	19121		3
691021	PA002000909	1838 N BUCKNELL ST	19121		3
804208	PA002000909	1843 N 17TH STREET	19121	A	3
804209	PA002000909	1843 N 17TH STREET	19121	B	3
804210	PA002000909	1843 N 17TH STREET	19121	C	3
804660	PA002000909	1512 DIAMOND ST	19121	A	4
804661	PA002000909	1512 DIAMOND ST	19121	B	4
818011	PA002000909	2135 N NATRONA ST	19121		3
818279	PA002000909	1860 N TANEY ST	19121		3
818362	PA002000909	1816 N RINGGOLD ST	19121		5
818416	PA002000909	3110 EUCLID ST	19121		6
818463	PA002000909	3113 W NORRIS ST	19121		3
041682	PA002000910	2435 CLIFFORD ST	19121		6
041838	PA002000910	2320 SHARSWOOD ST	19121		4
043073	PA002000910	2403 W OXFORD ST	19121		6
043252	PA002000910	1521 N 25TH STREET	19121		6
124892	PA002000910	2319 SHARSWOOD ST	19121		4
124949	PA002000910	1730 N MARSTON ST	19121		3
124963	PA002000910	1744 N 27TH STREET	19121		4
125110	PA002000910	1731 N TANEY ST	19121		3
125700	PA002000910	2403 INGERSOLL ST	19121		2
125867	PA002000910	1230 N DOVER ST	19121		3
125934	PA002000910	2238 INGERSOLL ST	19121		4
690016	PA002000910	1455 N HOLLYWOOD ST	19121		3
690022	PA002000910	1740 N 28TH STREET	19121		4
690551	PA002000910	1454 N HOLLYWOOD ST	19121		3
690633	PA002000910	2931 CECIL B MOORE AVE	19121		6
690737	PA002000910	2402 W THOMPSON ST	19121		5
690758	PA002000910	1710 N BAILEY ST	19121		3
691090	PA002000910	1738 N NEWKIRK ST	19121		3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
804684	PA002000910	2828 W MASTER ST	19121	A	4
804685	PA002000910	2828 W MASTER ST	19121	B	4
818137	PA002000910	1525 N 25TH STREET	19121		6
818255	PA002000910	2403 REDNER ST	19121		4
888580	PA002000910	1402 N 27TH STREET	19121		4
888633	PA002000910	2040 W MASTER ST	19121		6
888636	PA002000910	2927 W MASTER ST	19121		4
Disposition of Vacant Properties					
690680	901	5042 HOOPES ST	19139		3
690681	901	5068 HOOPES ST	19139		3
691373	901	645 N CREIGHTON ST	19131		3
888559	901	5210 HARLAN ST	19131		3
041580	902	3929 FOLSOM ST	19104		3
041789	902	3841 MT VERNON ST	19104		4
041796	902	3900 PARRISH ST	19104		4
042095	902	754 N 38TH STREET	19104		3
042283	902	813 N 40TH STREET	19104	A	1
042284	902	813 N 40TH STREET	19104	B	6
042393	902	3604 Wallace Street	19104		3
042445	902	3944 FOLSOM ST	19104		5
042752	902	3837 BRANDYWINE ST	19104		4
042841	902	3907 FAIRMOUNT AVE	19104	A	3
042842	902	3907 FAIRMOUNT AVE	19104	B	3
043031	902	636 N 36th Street	19104	A	2
043032	902	636 N 36th Street	19104	B	5
043081	902	751 N 39TH STREET	19104	A	2
043082	902	751 N 39TH STREET	19104	B	4
043116	902	823 N 40TH STREET	19104	A	2
043117	902	823 N 40TH STREET	19104	B	4
043118	902	825 N 40TH STREET	19104	A	2
043119	902	825 N 40TH STREET	19104	B	4
043131	902	813 N 42ND STREET	19104		3
043316	902	723 N 35TH STREET	19104	A	2
043317	902	723 N 35TH STREET	19104	B	4
043533	902	3824 HAVERFORD AVE	19104		3
043954	902	626 N 36TH STREET	19104		5
124924	902	3847 HAVERFORD AVE	19104		6
125118	902	714 N 34TH STREET	19104		6
125331	902	3830 BROWN ST	19104		5
125572	902	3913 FOLSOM ST	19104		3
125599	902	3935 FAIRMOUNT AVE	19104		5

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
125816	902	4234 W STILES ST	19104		5
125844	902	4223 VIOLA ST	19104		6
125871	902	3932 BROWN ST	19104		6
125893	902	3814 BROWN ST	19104		5
690788	902	3828 MT VERNON ST	19104		3
690877	902	3815 MT VERNON ST	19104		5
690938	902	625 N 36TH STREET	19104		5
690940	902	4508 OGDEN ST	19139		3
690941	902	4513 OGDEN ST	19139		3
691015	902	3833 MT VERNON ST	19104		5
691067	902	3711 MT VERNON ST	19104		3
691186	902	806 N 38TH STREET	19104		5
691358	902	3926 FOLSOM ST	19104		5
691393	902	3916 FOLSOM ST	19104		5
804098	902	3911 MT VERNON ST	19104		4
804167	902	727 N 35TH STREET	19104	A	2
804168	902	727 N 35TH STREET	19104	B	4
804183	902	614 UNION ST	19104		5
818149	902	807 PRESTON ST	19104		5
818513	902	4104 WESTMINSTER AVE	19104		6
818517	902	3924 FOLSOM ST	19104		5
888579	902	4018 BROWN ST	19104		6
888617	902	738 N BROOKLYN ST	19104		3
888618	902	740 N BROOKLYN ST	19104		3
888670	902	729 N 39TH STREET	19104		4
888677	902	4203 MANTUA AVE	19104		4
125388	903	2639 GERRITT ST	19146		3
125493	903	1247 S HANSON ST	19143		2
125533	903	1239 S HANSON ST	19143		2
125534	903	1237 S HANSON ST	19143		3
125637	903	1243 S HANSON ST	19143		2
125638	903	1248 S HANSON ST	19143		2
125649	903	1236 S HANSON ST	19143		2
125672	903	1246 S HANSON ST	19143		2
125794	903	636 HOFFMAN ST	19148		3
125846	903	1250 S HANSON ST	19143		2
691280	903	1915 CHRISTIAN ST	19146		6
804725	903	704 S 19TH STREET	19146		6
818389	903	605 EMILY ST	19148		4
857545	903	2144 S CECIL ST	19143		2
888765	903	1052 S PAXON ST	19143		3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
888861	903	6055 REINHART ST	19142		3
926716	903	6015 ALLMAN ST	19142		3
125504	904	2912 N 07TH STREET	19133		5
125664	904	2712 W STERNER ST	19132		2
125731	904	1946 W HILTON ST	19140		2
125860	904	2940 N SYDENHAM ST	19132		2
255956	904	3015 N MARVINE ST	19133		3
255977	904	1050 W STELLA ST	19133		2
255985	904	2811 N BOUDINOT ST	19134		4
818098	904	3154 N CARLISLE ST	19132		2
818184	904	3066 N 08TH STREET	19133		6
818222	904	3136 N 08TH STREET	19133		3
818295	904	2724 N WARNOCK ST	19133		3
818333	904	3135 N WENDLE ST	19133		3
818426	904	2925 N 06TH STREET	19133		6
818466	904	3100 N 08TH STREET	19133		4
857130	904	3346 N 22ND STREET	19140		5
888554	904	344 W PENN ST	19144		4
888663	904	324 W INDIANA AVE	19133		3
888668	904	2968 N 04TH STREET	19133		6
888694	904	3138 N 08TH STREET	19133		3
916076	904	3105 N 10TH STREET	19133		3
926701	904	1750 BELFIELD AVE	19141		3
926746	904	4815 GREENE ST	19144		6
926781	904	2054 E WILLIAM ST	19134		2
976168	904	3250 N RANDOLPH ST	19140		2
041525	905	2112 N 04TH STREET	19122		4
041570	905	1933 N 05TH STREET	19122		4
041571	905	1935 N 05TH STREET	19122		4
041572	905	1937 N 05TH STREET	19122		4
041616	905	2559 N FRANKLIN ST	19133		5
041619	905	410 W NORRIS ST	19122		6
41658	905	2315 N 07TH STREET	19133	A	2
41659	905	2315 N 07TH STREET	19133	B	6
41699	905	2430 N 06TH STREET	19133	A	1
41700	905	2430 N 06TH STREET	19133	B	4
41712	905	1947 N LAWRENCE ST	19122		5
41713	905	2045 N 05TH STREET	19122		4
41772	905	2532 N HOWARD ST	19133		5
41797	905	402 W DAUPHIN ST	19133		5
41810	905	416 W DAUPHIN ST	19133		5

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
41821	905	622 W CUMBERLAND ST	19133		5
41834	905	2164 N 05TH STREET	19122		5
41840	905	324 W DAUPHIN ST	19133		5
41877	905	2215 N LAWRENCE ST	19133		3
41932	905	2108 N 05TH STREET	19122		5
41945	905	2350 N BODINE ST	19133		3
41947	905	1426 N LAWRENCE ST	19122		4
41948	905	2627 N 06TH STREET	19133	A	2
41949	905	2627 N 06TH STREET	19133	B	4
41957	905	421 W DAUPHIN ST	19133		5
41965	905	2556 N 07TH STREET	19133	A	1
41966	905	2556 N 07TH STREET	19133	B	4
42035	905	2310 N LAWRENCE ST	19133		3
42036	905	544 W HUNTINGDON ST	19133		5
42100	905	2208 N LEITHGOW ST	19133		2
42101	905	2222 N LEITHGOW ST	19133		2
42102	905	2224 N LEITHGOW ST	19133		2
42175	905	1920 N 03RD STREET	19122		4
42298	905	1722 N ORIANNA ST	19122		6
42344	905	438 DIAMOND ST	19122		4
42356	905	2242 N 04TH STREET	19133		5
42381	905	532 DIAMOND ST	19122		4
42430	905	2343 N 06TH STREET	19133		5
42447	905	2360 N BODINE ST	19133		3
42448	905	2350 N ORKNEY ST	19133		2
42449	905	2352 N ORKNEY ST	19133		2
42488	905	2351 N ORKNEY ST	19133		2
42489	905	2353 N ORKNEY ST	19133		2
42497	905	2355 N ORKNEY ST	19133		2
42545	905	2344 N ORKNEY ST	19133		2
42546	905	2348 N ORKNEY ST	19133		2
42584	905	311 W BERKS ST	19122	A	3
42585	905	311 W BERKS ST	19122	B	3
42586	905	311 W BERKS ST	19122	C	3
42587	905	408 W BERKS ST	19122	A	1
42588	905	408 W BERKS ST	19122	B	4
42617	905	2343 N MARSHALL ST	19133		4
42713	905	1846 N LEITHGOW ST	19122		4
42728	905	2412 N 03RD STREET	19133		5
42729	905	929 W HUNTINGDON ST	19133		5
42808	905	2336 N BODINE ST	19133		3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
42835	905	2024 N BODINE ST	19122		2
42896	905	1553 N 06TH STREET	19122	A	2
42897	905	1553 N 06TH STREET	19122	B	6
42909	905	543 W MONTGOMERY AVE	19122	A	5
42910	905	543 W MONTGOMERY AVE	19122	B	2
42929	905	2036 N BODINE ST	19122		2
42930	905	406 W BERKS ST	19122	A	2
42931	905	406 W BERKS ST	19122	B	5
42949	905	2347 N 03RD STREET	19133		5
42950	905	2438 N LEITHGOW ST	19133		2
43019	905	2025 N 03RD STREET	19122		5
43085	905	2340 N 06TH STREET	19133	A	2
43086	905	2340 N 06TH STREET	19133	B	5
43126	905	2338 N 03RD STREET	19133		5
43153	905	193 W DAUPHIN ST	19133		4
43154	905	2538 N HOPE ST	19133		2
43177	905	2254 PALETHORP ST	19133		5
43186	905	412 W DAUPHIN ST	19133		5
43187	905	317 W BERKS ST	19122	A	3
43188	905	317 W BERKS ST	19122	B	3
43193	905	2331 N 06TH STREET	19133		6
43237	905	2003 N 05TH STREET	19122	A	1
43238	905	2003 N 05TH STREET	19122	B	4
43256	905	2214 N LEITHGOW ST	19133		2
43257	905	1529 N 06TH STREET	19122	A	3
43258	905	1529 N 06TH STREET	19122	B	3
43268	905	2222 N LAWRENCE ST	19133		5
43280	905	1555 N 06TH STREET	19122	A	1
43281	905	1555 N 06TH STREET	19122	B	5
43308	905	2232 N 03RD STREET	19133		5
43334	905	2530 N 06TH STREET	19133	A	3
43335	905	2530 N 06TH STREET	19133	B	3
43372	905	302 W SUSQUEHANNA AVE	19122	A	2
43373	905	302 W SUSQUEHANNA AVE	19122	B	5
43374	905	1936 N 04TH STREET	19122		4
43377	905	1837 N 06TH STREET	19122		4
43389	905	314 W DAUPHIN ST	19133	A	1
43390	905	314 W DAUPHIN ST	19133	B	4
43412	905	2322 PALETHORP ST	19133		4
43434	905	2223 N 05TH STREET	19133		4
43435	905	1533 N 06TH STREET	19122	A	3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
43436	905	1533 N 06TH STREET	19122	B	3
43437	905	1533 N 06TH STREET	19122	C	1
43443	905	2231 N ORKNEY ST	19133		2
43463	905	2149 N 05TH STREET	19122	A	2
43464	905	2149 N 05TH STREET	19122	B	5
43478	905	618 W YORK ST	19133	A	4
43479	905	618 W YORK ST	19133	B	5
43500	905	2339 N 06TH STREET	19133		5
43504	905	647 W CUMBERLAND ST	19133	A	3
43505	905	647 W CUMBERLAND ST	19133	B	6
43548	905	517 W DAUPHIN ST	19133	A	3
43549	905	517 W DAUPHIN ST	19133	B	3
43634	905	2336 N 03RD STREET	19133		5
43703	905	421 W BERKS ST	19122	A	2
43704	905	421 W BERKS ST	19122	B	3
43728	905	313 W BERKS ST	19122	A	5
43729	905	313 W BERKS ST	19122	B	5
43730	905	2001 N 04TH STREET	19122	A	1
43731	905	2001 N 04TH STREET	19122	B	4
43736	905	2213 N 05TH STREET	19133		4
43829	905	2256 N HOWARD ST	19133		5
43878	905	543 W BERKS ST	19122	A	3
43879	905	543 W BERKS ST	19122	B	3
43880	905	543 W BERKS ST	19122	C	3
43914	905	2446 N 06TH STREET	19133	A	3
43915	905	2446 N 06TH STREET	19133	B	4
43939	905	2123 N 04TH STREET	19122		4
43940	905	2148 N ORKNEY ST	19122		3
43941	905	2150 N ORKNEY ST	19122		3
124817	905	1923 N 05TH STREET	19122		4
124835	905	2367 N 03RD STREET	19133		5
124836	905	2256 N REESE ST	19133		3
124847	905	2222 N 03RD STREET	19133		5
124896	905	2127 N 05TH STREET	19122		5
124918	905	2215 N 05TH STREET	19133		4
124958	905	327 W SUSQUEHANNA AVE	19122		6
124992	905	2243 N REESE ST	19133		4
125007	905	2552 N HOWARD ST	19133		5
125018	905	2134 N ORKNEY ST	19122		4
125030	905	1848 N LEITHGOW ST	19122		5
125035	905	436 W NORRIS ST	19122		5

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
125043	905	2228 N LAWRENCE ST	19133		5
125055	905	2227 N REESE ST	19133		5
125097	905	316 W NORRIS ST	19122		5
125136	905	2455 N 06TH STREET	19133		5
125141	905	1853 N LEITHGOW ST	19122		5
125152	905	2542 N HOWARD ST	19133		5
125183	905	2443 N HOWARD ST	19133		2
125201	905	608 W HAROLD ST	19133		3
125226	905	440 W NORRIS ST	19122		5
125236	905	520 W YORK ST	19133		5
125239	905	1940 N 03RD STREET	19122		4
125269	905	2128 N REESE ST	19122		2
125279	905	2128 N 05TH STREET	19122		4
125283	905	2526 N HOWARD ST	19133		5
125305	905	1849 N LEITHGOW ST	19122		5
125330	905	2528 N 06TH STREET	19133		6
125355	905	2551 N ORKNEY ST	19133		2
125358	905	526 MORSE ST	19122		2
125371	905	642 W CUMBERLAND ST	19133		6
125379	905	1842 N LEITHGOW ST	19122		5
125418	905	1739 N ORIANNA ST	19122		4
125467	905	2209 N 05TH STREET	19133		4
125513	905	2021 N 05TH STREET	19122		5
125564	905	1913 N 04TH STREET	19122		4
125578	905	185 W NORRIS ST	19122		4
125594	905	2332 N BODINE ST	19133		2
125603	905	538 EDGLEY ST	19122		2
125605	905	813 W HUNTINGDON ST	19133		4
125646	905	622 W HUNTINGDON ST	19133		5
125661	905	2260 N LEITHGOW ST	19133		2
125686	905	528 MORSE ST	19122		2
125699	905	534 EDGLEY ST	19122		2
125746	905	1935 N LAWRENCE ST	19122		4
125752	905	645 W CUMBERLAND ST	19133		5
125772	905	311 W YORK ST	19133		4
125796	905	2549 N ORKNEY ST	19133		2
125815	905	262 DIAMOND ST	19122		5
125842	905	2234 N 04TH STREET	19133		4
125938	905	407 W BERKS ST	19122		4
255979	905	2327 N 06TH STREET	19133		5
690176	905	523 W MONTGOMERY AVE	19122		5

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
690200	905	532 W BERKS ST	19122		4
690233	905	537 W MONTGOMERY AVE	19122		5
690260	905	1945 N 04TH STREET	19122		4
690340	905	2441 N MARSHALL ST	19133		5
690423	905	2220 N LAWRENCE ST	19133		6
690438	905	2140 N 03RD STREET	19122		5
690519	905	2256 N HANCOCK ST	19133		4
690728	905	2642 N 03RD STREET	19133		3
690795	905	2052 N 03RD STREET	19122		4
690832	905	2322 N 03RD STREET	19133		4
690869	905	2357 N 03RD STREET	19133		4
690913	905	2118 N 03RD STREET	19122		4
691005	905	2045 N 03RD STREET	19122		5
691049	905	2560 N 07TH STREET	19133		5
691099	905	2325 N 03RD STREET	19133		5
691108	905	2329 N 03RD STREET	19133		5
691112	905	618 W CUMBERLAND ST	19133		5
691192	905	2522 N 09TH STREET	19133		4
691271	905	2320 N 03RD STREET	19133		5
691326	905	2328 N 03RD STREET	19133		5
691340	905	2232 N LAWRENCE ST	19133		5
691342	905	2216 N LAWRENCE ST	19133		5
691444	905	2133 N 05TH STREET	19122		4
691449	905	2020 N 03RD STREET	19122		5
691501	905	938 W. HUNTINGDON ST	19133		1
804002	905	322 DIAMOND ST	19122		4
804003	905	424 W YORK ST	19133	A	4
804004	905	424 W YORK ST	19133	B	4
804085	905	309 W YORK ST	19133		5
804111	905	522 DIAMOND ST	19122		4
804122	905	2146 N 05TH STREET	19122		5
804169	905	1912 N 03RD STREET	19122	A	2
804170	905	1912 N 03RD STREET	19122	B	3
804171	905	1914 N 03RD STREET	19122	A	2
804172	905	1914 N 03RD STREET	19122	B	3
804202	905	1714 N ORIANNA ST	19122		4
804203	905	1733 N ORIANNA ST	19122		4
804204	905	1741 N ORIANNA ST	19122		4
804223	905	2340 N ORKNEY ST	19133		2
804241	905	2352 N BODINE ST	19133		3
804260	905	2249 PALETHORP ST	19133		4

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
804261	905	1934 N LEITHGOW ST	19122		3
804275	905	309 W NORRIS ST	19122		6
804276	905	304 W YORK ST	19133		5
804277	905	626 W CUMBERLAND ST	19133	A	3
804278	905	626 W CUMBERLAND ST	19133	B	3
804296	905	2128 N 02ND STREET	19122		5
804303	905	2601 N 04TH STREET	19133	A	3
804304	905	2601 N 04TH STREET	19133	B	3
804305	905	2601 N 04TH STREET	19133	C	3
804350	905	1443 N 05TH STREET	19122	A	1
804351	905	1443 N 05TH STREET	19122	B	4
804382	905	1945 MUTTER ST	19122		2
804524	905	1932 PALETHORP ST	19122	D (all)	5
804544	905	2239 PALETHORP ST	19133		3
804545	905	2243 PALETHORP ST	19133		3
804559	905	529 W MONTGOMERY AVE	19122	A	3
804560	905	529 W MONTGOMERY AVE	19122	B	3
804586	905	2329 N 06TH STREET	19133	A	3
804587	905	2329 N 06TH STREET	19133	B	2
804609	905	1551 N 06TH STREET	19122	A	2
804610	905	1551 N 06TH STREET	19122	B	3
804611	905	1551 N 06TH STREET	19122	C	1
804621	905	1523 N 06TH STREET	19122	A	3
804622	905	1523 N 06TH STREET	19122	B	5
804639	905	2442 N 06TH STREET	19133	A	2
804640	905	2442 N 06TH STREET	19133	B	4
804695	905	2539 N HOWARD ST	19133		5
804722	905	533 EDGLEY ST	19122		2
804723	905	535 EDGLEY ST	19122		2
804729	905	1439 N ORKNEY ST	19122		2
804731	905	1939 N 04TH STREET	19122		5
818023	905	527 W BERKS ST	19122		5
818041	905	2256 N 04TH STREET	19133		3
818170	905	404 W HUNTINGDON ST	19133		5
818229	905	541 W BERKS ST	19122		5
818313	905	35 E SOMERSET ST	19134		5
818336	905	428 W NORRIS ST	19122		5
818352	905	1846 N 04TH STREET	19122		5
926744	905	526 W DAUPHIN ST	19133		4
926749	905	612 W HAROLD ST	19133		3
926753	905	2217 N LAWRENCE ST	19133		2

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
926757	905	2324 MUTTER ST	19133		2
926769	905	2046 N ORKNEY ST	19122		2
926784	905	1915 N 02ND STREET	19122		5
926785	905	1922 N 02ND STREET	19122		5
926786	905	2507 N 02ND STREET	19133		3
41546	906	1610 N 17TH STREET	19121		6
41555	906	1612 N 17TH STREET	19121		6
41916	906	1432 N 17TH STREET	19121	A	2
41917	906	1432 N 17TH STREET	19121	B	6
41918	906	1616 W FLORA ST	19121		4
42079	906	1825 WALLACE ST	19130	A	5
42080	906	1825 WALLACE ST	19130	B	5
42215	906	1620 W OXFORD ST	19121	A	3
42216	906	1620 W OXFORD ST	19121	B	3
42217	906	1620 W OXFORD ST	19121	C	3
42336	906	1304 N 18TH STREET	19121	A	3
42337	906	1304 N 18TH STREET	19121	B	3
42455	906	1810 W MONTGOMERY AVE	19121		5
42464	906	1507 BROWN ST	19130		4
42593	906	1437 N 17TH STREET	19121	A	2
42594	906	1437 N 17TH STREET	19121	B	3
42595	906	1437 N 17TH STREET	19121	C	3
42618	906	1112 NORTH ST	19123		3
42624	906	1414 N 17TH STREET	19121	A	2
42625	906	1414 N 17TH STREET	19121	B	3
42626	906	1414 N 17TH STREET	19121	C	3
42772	906	844 N 16TH STREET	19130		4
42992	906	1701 SEYBERT ST	19121		3
43121	906	1620 WILLINGTON ST	19121	A	1
43122	906	1620 WILLINGTON ST	19121	B	5
43143	906	1429 N 18TH STREET	19121	A	2
43144	906	1429 N 18TH STREET	19121	B	3
43145	906	1429 N 18TH STREET	19121	C	3
43170	906	1632 W OXFORD ST	19121	A	4
43171	906	1632 W OXFORD ST	19121	B	3
43172	906	1632 W OXFORD ST	19121	C	3
43181	906	610 N 11TH STREET	19123	A	4
43182	906	610 N 11TH STREET	19123	B	3
43183	906	610 N 11TH STREET	19123	C	4
43351	906	918 N 17TH STREET	19130	A	3
43352	906	918 N 17TH STREET	19130	B	3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
43353	906	918 N 17TH STREET	19130	C	4
43469	906	649 N 11TH STREET	19123	A	2
43470	906	649 N 11TH STREET	19123	B	3
43471	906	649 N 11TH STREET	19123	C	3
43631	906	1628 N 17TH STREET	19121	A	4
43632	906	1628 N 17TH STREET	19121	B	4
43633	906	1628 N 17TH STREET	19121	C	4
43648	906	1702 INGERSOLL ST	19121		5
43670	906	1513 W OXFORD ST	19121	A	3
43671	906	1513 W OXFORD ST	19121	B	3
43672	906	1513 W OXFORD ST	19121	C	3
43784	906	721 N 10TH STREET	19123	A	3
43785	906	721 N 10TH STREET	19123	B	3
43786	906	721 N 10TH STREET	19123	C	3
43837	906	1801 WALLACE ST	19130	A	4
43838	906	1801 WALLACE ST	19130	B	4
43839	906	1801 WALLACE ST	19130	C	4
43851	906	730 N 19TH STREET	19130	A	2
43852	906	730 N 19TH STREET	19130	B	4
43893	906	1807 WALLACE ST	19130	A	4
43894	906	1807 WALLACE ST	19130	B	3
43895	906	1807 WALLACE ST	19130	C	3
43907	906	1725 N GRATZ ST	19121		5
43959	906	626 N 10TH STREET	19123	A	3
43960	906	626 N 10TH STREET	19123	B	3
43961	906	626 N 10TH STREET	19123	C	3
43976	906	1538 W MASTER ST	19121	A	4
43977	906	1538 W MASTER ST	19121	B	4
43978	906	1538 W MASTER ST	19121	C	4
43980	906	1423 N 17TH STREET	19121	A	3
43981	906	1423 N 17TH STREET	19121	B	3
43982	906	1423 N 17TH STREET	19121	C	3
43983	906	1425 N 17TH STREET	19121	A	3
43984	906	1425 N 17TH STREET	19121	B	3
43985	906	1425 N 17TH STREET	19121	C	3
124912	906	1418 N 17TH STREET	19121	A	4
124913	906	1418 N 17TH STREET	19121	B	4
124948	906	1606 N SYDENHAM ST	19121		5
124957	906	820 LELAND ST	19130		5
125040	906	1808 INGERSOLL ST	19121		4
125063	906	1601 WILLINGTON ST	19121		4

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
125074	906	1619 W FLORA ST	19121		4
125175	906	1716 INGERSOLL ST	19121		4
125744	906	2032 POPLAR ST	19130		4
690196	906	1404 WILLINGTON ST	19121		5
690294	906	1427 N 17TH STREET	19121	A	3
690295	906	1427 N 17TH STREET	19121	B	3
690296	906	1427 N 17TH STREET	19121	C	3
690306	906	1443 N 17TH STREET	19121	A	3
690307	906	1443 N 17TH STREET	19121	B	3
690308	906	1443 N 17TH STREET	19121	C	3
690330	906	1411 N 17TH STREET	19121	A	3
690331	906	1411 N 17TH STREET	19121	B	3
690332	906	1411 N 17TH STREET	19121	C	3
690979	906	1610 PARRISH ST	19130		4
691259	906	1803 WALLACE ST	19130	A	3
691260	906	1803 WALLACE ST	19130	B	4
691261	906	1803 WALLACE ST	19130	C	3
691440	906	1614 N 17TH STREET	19121		6
691456	906	1815 WALLACE ST	19130	A	4
691457	906	1815 WALLACE ST	19130	B	3
691458	906	1815 WALLACE ST	19130	C	4
691459	906	1817 WALLACE ST	19130	A	4
691460	906	1817 WALLACE ST	19130	B	3
691461	906	1817 WALLACE ST	19130	C	4
803994	906	622 N 10TH STREET	19123	A	4
803995	906	622 N 10TH STREET	19123	B	4
804062	906	1536 W MASTER ST	19121	A	3
804063	906	1536 W MASTER ST	19121	B	3
804064	906	1536 W MASTER ST	19121	C	3
804153	906	1533 N 17TH STREET	19121	A	3
804154	906	1533 N 17TH STREET	19121	B	4
804155	906	1533 N 17TH STREET	19121	C	3
804356	906	1831 WALLACE ST	19130	A	3
804357	906	1831 WALLACE ST	19130	B	3
804358	906	1831 WALLACE ST	19130	C	3
804388	906	1422 N 17TH STREET	19121	A	4
804389	906	1422 N 17TH STREET	19121	B	4
804401	906	1433 N 17TH STREET	19121	A	3
804402	906	1433 N 17TH STREET	19121	B	3
804403	906	1433 N 17TH STREET	19121	C	3
804478	906	636 N 11TH STREET	19123	A	2

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
804479	906	636 N 11TH STREET	19123	B	6
804521	906	1527 N 17TH STREET	19121	A	3
804522	906	1527 N 17TH STREET	19121	B	3
804523	906	1527 N 17TH STREET	19121	C	3
804552	906	925 N 19TH STREET	19130	A	2
804553	906	925 N 19TH STREET	19130	B	3
804554	906	925 N 19TH STREET	19130	C	3
804598	906	1518 GREEN ST	19130	A	4
804599	906	1518 GREEN ST	19130	B	4
804600	906	1518 GREEN ST	19130	C	4
804623	906	1432 POPLAR ST	19130	A	3
804624	906	1432 POPLAR ST	19130	B	3
804625	906	1432 POPLAR ST	19130	C	3
804651	906	1616 W OXFORD ST	19121	A	3
804652	906	1616 W OXFORD ST	19121	B	2
804653	906	1616 W OXFORD ST	19121	C	3
804709	906	1809 W MASTER ST	19121	A	3
804710	906	1809 W MASTER ST	19121	B	4
804714	906	1618 N 17TH STREET	19121	A	4
804715	906	1618 N 17TH STREET	19121	B	5
818309	906	1730 N GRATZ ST	19121		4
41534	907	2123 N 08TH STREET	19122		5
41541	907	1951 N MARSHALL ST	19122		5
41583	907	1439 N 08TH STREET	19122	A	3
41584	907	1439 N 08TH STREET	19122	B	2
41585	907	1439 N 08TH STREET	19122	C	2
41599	907	1955 N 07TH STREET	19122	A	2
41600	907	1955 N 07TH STREET	19122	B	6
41610	907	1400 N FRANKLIN ST	19122	A	4
41611	907	1400 N FRANKLIN ST	19122	B	4
41662	907	1418 N FRANKLIN ST	19122		6
41717	907	605 W MONTGOMERY AVE	19122		5
41736	907	1331 N 07TH STREET	19122	A	3
41737	907	1331 N 07TH STREET	19122	B	3
41738	907	1331 N 07TH STREET	19122	C	2
41777	907	2007 N MARSHALL ST	19122		5
41779	907	2142 N MARSHALL ST	19122		4
41815	907	928 W YORK ST	19133		4
41857	907	1338 N FRANKLIN ST	19122	A	3
41858	907	1338 N FRANKLIN ST	19122	B	3
41859	907	1338 N FRANKLIN ST	19122	C	3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
41878	907	1542 N 07TH STREET	19122	A	2
41879	907	1542 N 07TH STREET	19122	B	6
41972	907	1808 N FRANKLIN ST	19122	A	3
41973	907	1808 N FRANKLIN ST	19122	B	2
41974	907	1808 N FRANKLIN ST	19122	C	3
41975	907	2122 N FRANKLIN ST	19122		4
42048	907	1443 N 08TH STREET	19122		4
42058	907	1339 N 08TH STREET	19122		6
42059	907	2353 N 10TH STREET	19133		5
42078	907	2048 N 07TH STREET	19122		6
42115	907	1818 N FRANKLIN ST	19122	A	2
42116	907	1818 N FRANKLIN ST	19122	B	6
42138	907	2351 N 10TH STREET	19133		5
42139	907	2547 N 11TH STREET	19133		5
42159	907	2034 N FRANKLIN ST	19122		5
42166	907	2411 N 10TH STREET	19133		5
42193	907	1550 N DARIEN ST	19122		2
42235	907	2311 N 10TH STREET	19133	A	1
42236	907	2311 N 10TH STREET	19133	B	4
42300	907	2507 N 11TH STREET	19133		5
42319	907	1836 N FRANKLIN ST	19122		6
42371	907	1916 N 08TH STREET	19122	A	1
42372	907	1916 N 08TH STREET	19122	B	5
42382	907	1539 N 09TH STREET	19122		4
42400	907	1919 N 07TH STREET	19122	A	4
42401	907	1919 N 07TH STREET	19122	B	5
42404	907	1824 N 06TH STREET	19122		5
42408	907	611 W JEFFERSON ST	19122		3
42453	907	1939 N 09TH STREET	19122		4
42456	907	2148 N MARSHALL ST	19122		4
42457	907	1814 N FRANKLIN ST	19122	A	3
42458	907	1814 N FRANKLIN ST	19122	B	3
42459	907	1814 N FRANKLIN ST	19122	C	3
42460	907	1935 N 09TH STREET	19122		4
42490	907	1401 N PERTH ST	19122		4
42510	907	741 W MONTGOMERY AVE	19122		5
42511	907	1806 N FRANKLIN ST	19122	A	3
42512	907	1806 N FRANKLIN ST	19122	B	2
42513	907	1806 N FRANKLIN ST	19122	C	3
42561	907	1812 N FRANKLIN ST	19122	A	3
42562	907	1812 N FRANKLIN ST	19122	B	3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
42563	907	1812 N FRANKLIN ST	19122	C	3
42564	907	1816 N FRANKLIN ST	19122	A	3
42565	907	1816 N FRANKLIN ST	19122	B	3
42566	907	1816 N FRANKLIN ST	19122	C	3
42567	907	1820 N FRANKLIN ST	19122	A	2
42568	907	1820 N FRANKLIN ST	19122	B	2
42569	907	1820 N FRANKLIN ST	19122	C	3
42570	907	1830 N FRANKLIN ST	19122	A	1
42571	907	1830 N FRANKLIN ST	19122	B	5
42572	907	2500 N ALDER ST	19133		2
42616	907	1810 N MARSHALL ST	19122		4
42667	907	2627 N 13TH STREET	19133		5
42668	907	1828 N FRANKLIN ST	19122	A	3
42669	907	1828 N FRANKLIN ST	19122	B	4
42757	907	2132 N MARSHALL ST	19122		4
42782	907	1834 N FRANKLIN ST	19122	A	2
42783	907	1834 N FRANKLIN ST	19122	B	6
42809	907	2510 N 11TH STREET	19133		6
42912	907	1523 N 07TH STREET	19122	B	4
42970	907	1015 W ARIZONA ST	19133		2
42971	907	1232 W YORK ST	19133		3
43033	907	1406 N 07TH STREET	19122		4
43152	907	1835 N 08TH STREET	19122		6
43158	907	1518 N DARIEN ST	19122		2
43178	907	1644 N MARSHALL ST	19122	A	3
43179	907	1644 N MARSHALL ST	19122	B	3
43225	907	1822 N FRANKLIN ST	19122	A	2
43226	907	1822 N FRANKLIN ST	19122	B	6
43227	907	1824 N FRANKLIN ST	19122	A	2
43228	907	1824 N FRANKLIN ST	19122	B	6
43229	907	2346 N 09TH STREET	19133	A	2
43230	907	2346 N 09TH STREET	19133	B	3
43242	907	1545 N FRANKLIN ST	19122	A	3
43243	907	1545 N FRANKLIN ST	19122	B	4
43273	907	2348 N 10TH STREET	19133	A	3
43274	907	2348 N 10TH STREET	19133	B	3
43275	907	2348 N 10TH STREET	19133	C	3
43309	907	1934 N 08TH STREET	19122		5
43442	907	2438 N PARK AVE	19132		6
43492	907	2504 N 10TH STREET	19133		5
43550	907	1234 W HUNTINGDON ST	19133	A	3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
43551	907	1234 W HUNTINGDON ST	19133	B	3
43630	907	906 W SUSQUEHANNA AVE	19122		5
43638	907	1705 N MARSHALL ST	19122		4
43705	907	1932 N 06TH STREET	19122	A	4
43706	907	1932 N 06TH STREET	19122	B	4
43707	907	1652 N MARSHALL ST	19122	A	4
43708	907	1652 N MARSHALL ST	19122	B	3
43749	907	1939 N 07TH STREET	19122	A	3
43750	907	1939 N 07TH STREET	19122	B	3
43751	907	1939 N 07TH STREET	19122	C	3
43830	907	1654 N MARSHALL ST	19122	A	3
43831	907	1654 N MARSHALL ST	19122	B	3
43884	907	1327 N 08TH STREET	19122	A	2
43885	907	1327 N 08TH STREET	19122	B	5
124932	907	2207 N 07TH STREET	19133		5
125031	907	1210 N 07TH STREET	19122	A	5
125032	907	1210 N 07TH STREET	19122	B	5
125062	907	2257 N CAMAC ST	19133		4
125073	907	2439 N 10TH STREET	19133		6
125164	907	606 CECIL B MOORE AVE	19122		4
125165	907	608 CECIL B MOORE AVE	19122		4
125211	907	2203 N FRANKLIN ST	19133		3
125227	907	2229 N FRANKLIN ST	19133		5
125265	907	2212 N FRANKLIN ST	19133		6
125307	907	2523 N 11TH STREET	19133		5
125399	907	1222 W YORK ST	19133		3
125449	907	2527 N 11TH STREET	19133		5
125462	907	2449 N PARK AVE	19132		5
125532	907	2328 N FAWN ST	19133		3
125565	907	908 W SUSQUEHANNA AVE	19122		5
125604	907	2243 N FRANKLIN ST	19133		6
125620	907	1423 N 08TH STREET	19122		6
125659	907	608 W NORRIS ST	19122		5
125669	907	1436 N FRANKLIN ST	19122		6
125680	907	2144 N FRANKLIN ST	19122		4
125694	907	1547 N 09TH STREET	19122		5
125734	907	2108 N PERCY ST	19122		2
125745	907	2330 N FAWN ST	19133		3
125751	907	2148 N 08TH STREET	19122		5
125828	907	2512 N 10TH STREET	19133		5
125841	907	2024 N FRANKLIN ST	19122		5

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
255981	907	2226 N 07TH STREET	19133		5
690215	907	2511 N 11TH STREET	19133	A	2
690216	907	2511 N 11TH STREET	19133	B	3
690259	907	2125 N 09TH STREET	19122		5
690309	907	2139 N 09TH STREET	19122		5
690310	907	2145 N 09TH STREET	19122		5
690320	907	1810 N FRANKLIN ST	19122	A	3
690321	907	1810 N FRANKLIN ST	19122	B	2
690322	907	1810 N FRANKLIN ST	19122	C	3
690333	907	2135 N 09TH STREET	19122		5
690356	907	2453 N 10TH STREET	19133	A	2
690357	907	2453 N 10TH STREET	19133	B	3
690944	907	2057 N 08TH STREET	19122		5
691018	907	2202 N 07TH STREET	19133		5
691032	907	2152 N 07TH STREET	19122		4
691111	907	2206 N 07TH STREET	19133		5
691392	907	2154 N 07TH STREET	19122		5
691422	907	2138 N FRANKLIN ST	19122		5
691446	907	2508 N 11TH STREET	19133		5
804006	907	1601 N MARSHALL ST	19122		5
804053	907	1649 N 08TH STREET	19122	A	3
804054	907	1649 N 08TH STREET	19122	B	3
804114	907	1908 N 08TH STREET	19122		5
804160	907	626 CECIL B MOORE AVE	19122		4
804263	907	1950 N 08TH STREET	19122	A	3
804264	907	1950 N 08TH STREET	19122	B	3
804324	907	1511 N FRANKLIN ST	19122	A	3
804325	907	1511 N FRANKLIN ST	19122	B	3
804326	907	1511 N FRANKLIN ST	19122	C	3
804352	907	1931 N 09TH STREET	19122		4
804409	907	1445 N FRANKLIN ST	19122		5
804428	907	1805 N 08TH STREET	19122		6
804594	907	1927 N 07TH STREET	19122	A	3
804595	907	1927 N 07TH STREET	19122	B	5
804646	907	1228 N MARSHALL ST	19122	A	3
804647	907	1228 N MARSHALL ST	19122	B	3
804648	907	1228 N MARSHALL ST	19122	C	3
804708	907	606 W NORRIS ST	19122		5
804712	907	2610 N 11TH STREET	19133	A	3
804713	907	2610 N 11TH STREET	19133	B	4
804719	907	2260 N 12TH STREET	19133		5

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
804724	907	2248 N CAMAC ST	19133		3
804737	907	2139 N FRANKLIN ST	19122		5
804738	907	2531 N 11TH STREET	19133		5
804739	907	2218 N CAMAC ST	19133		6
818070	907	1824 N MARSHALL ST	19122		4
818091	907	1548 N 07TH STREET	19122		6
818164	907	631 DIAMOND ST	19122		6
818173	907	1739 N MARSHALL ST	19122		4
818218	907	1341 N 08TH STREET	19122		6
818318	907	2214 N 09TH STREET	19133		5
818397	907	2239 N CAMAC ST	19133		6
888603	907	2253 N CAMAC ST	19133		4
888629	907	2615 N 11TH STREET	19133		5
41556	908	2335 N 21ST STREET	19132		6
41601	908	2327 N 21ST STREET	19132		6
41649	908	2250 N 21ST STREET	19132	A	2
41650	908	2250 N 21ST STREET	19132	B	5
41804	908	2233 N 17TH STREET	19132		4
41978	908	2349 N 21ST STREET	19132		5
41996	908	2648 N HOLLYWOOD ST	19132		3
42012	908	2347 N 32ND STREET	19132		3
42110	908	2211 N 27TH STREET	19132	A	2
42111	908	2211 N 27TH STREET	19132	B	4
42127	908	2406 N MARSTON ST	19132		2
42480	908	2251 N MOLE ST	19132		2
42521	908	2321 N CROSKEY ST	19132		2
42578	908	2309 N CROSKEY ST	19132		3
42656	908	2320 N 21ST STREET	19132	A	2
42657	908	2320 N 21ST STREET	19132	B	4
42673	908	2319 N 16TH STREET	19132	A	2
42674	908	2319 N 16TH STREET	19132	B	5
42681	908	2946 W YORK ST	19132		2
42774	908	1913 W DAUPHIN ST	19132	A	1
42775	908	1913 W DAUPHIN ST	19132	B	5
42821	908	2209 N 27TH STREET	19132	A	2
42822	908	2209 N 27TH STREET	19132	B	4
42946	908	2339 N 21ST STREET	19132	A	2
42947	908	2339 N 21ST STREET	19132	B	4
42994	908	2266 N VAN PELT ST	19132		3
43066	908	2329 N 16TH STREET	19132	A	1
43067	908	2329 N 16TH STREET	19132	B	5

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
43298	908	2342 N 20TH STREET	19132	A	3
43299	908	2342 N 20TH STREET	19132	B	3
43330	908	1940 W YORK ST	19132		6
43517	908	2332 N 21ST STREET	19132	A	3
43518	908	2332 N 21ST STREET	19132	B	3
43545	908	2350 N 21ST STREET	19132	A	3
43546	908	2350 N 21ST STREET	19132	B	3
43598	908	2203 N 19TH STREET	19132	A	3
43599	908	2203 N 19TH STREET	19132	B	4
43676	908	2262 N 21ST STREET	19132	A	3
43677	908	2262 N 21ST STREET	19132	B	4
43720	908	2552 W OAKDALE ST	19132	A	3
43721	908	2552 W OAKDALE ST	19132	B	3
43767	908	2601 W OAKDALE ST	19132	A	3
43768	908	2601 W OAKDALE ST	19132	B	5
43833	908	2311 N 20TH STREET	19132	A	3
43834	908	2311 N 20TH STREET	19132	B	3
124974	908	2236 N 19TH STREET	19132		5
125002	908	2230 N 19TH STREET	19132		6
125102	908	2345 N 22ND STREET	19132		6
125190	908	2549 N GARNET ST	19132		4
125206	908	2353 N 20TH STREET	19132		5
125246	908	2453 N NEWKIRK ST	19132		2
125261	908	2245 N UBER ST	19132		6
125326	908	2239 N 17TH STREET	19132		6
125356	908	2336 N VAN PELT ST	19132		3
125367	908	2454 N NEWKIRK ST	19132		2
125400	908	2436 N NEWKIRK ST	19132		2
125421	908	2219 N 22ND STREET	19132		6
125438	908	2328 N 16TH STREET	19132		6
125442	908	2355 N OPAL ST	19132		2
125454	908	2431 N DOVER ST	19132		2
125472	908	2454 N DOVER ST	19132		2
125531	908	2224 N 19TH STREET	19132		6
125546	908	2244 N 19TH STREET	19132		5
125577	908	3147 W ARIZONA ST	19132		2
125596	908	2240 N 19TH STREET	19132		5
125653	908	2449 N DOVER ST	19132		2
125676	908	2609 W OAKDALE ST	19132		2
125775	908	2326 N 21ST STREET	19132		6
125836	908	2216 N 19TH STREET	19132		6

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
125859	908	2243 N 21ST STREET	19132		6
125876	908	2459 N NATRONA ST	19132		2
125881	908	2341 N 21ST STREET	19132		6
125907	908	2634 N 29TH STREET	19132		6
255953	908	2446 N DOVER ST	19132		2
255988	908	3033 W OAKDALE ST	19132		2
690121	908	2330 N 21ST STREET	19132		6
690122	908	2328 N 21ST STREET	19132		6
690134	908	2340 N 16TH STREET	19132		6
690177	908	2224 N 17TH STREET	19132		6
690219	908	2252 N 19TH STREET	19132		5
690405	908	2553 N 16TH STREET	19132		6
690973	908	2356 N OPAL ST	19132		3
691072	908	2425 N MARSTON ST	19132		2
691149	908	2603 N 29TH STREET	19132	A	2
691150	908	2603 N 29TH STREET	19132	B	3
691439	908	2415 N MARSTON ST	19132		2
804067	908	2334 N 20TH STREET	19132	A	3
804068	908	2334 N 20TH STREET	19132	B	3
804254	908	2320 N 22ND STREET	19132	A	3
804255	908	2320 N 22ND STREET	19132	B	3
804373	908	2336 N 22ND STREET	19132	A	3
804374	908	2336 N 22ND STREET	19132	B	3
804375	908	2340 N 22ND STREET	19132	A	3
804376	908	2340 N 22ND STREET	19132	B	3
804417	908	2345 N 20TH STREET	19132		4
804534	908	2213 N 22ND STREET	19132	A	3
804535	908	2213 N 22ND STREET	19132	B	4
804678	908	2314 N 22ND STREET	19132	A	2
804679	908	2314 N 22ND STREET	19132	B	3
804716	908	2218 N 21ST STREET	19132	A	3
804717	908	2218 N 21ST STREET	19132	B	4
804753	908	1922 W YORK ST	19132		5
818256	908	2722 W HUNTINGDON ST	19132		3
818482	908	2218 N 19TH STREET	19132		6
888705	908	2619 N 17TH STREET	19132		5
926742	908	2320 N CLEVELAND ST	19132		3
926761	908	2523 N NAPA ST	19132		2
41504	909	1938 N TAYLOR ST	19121		3
41507	909	2010 W NORRIS ST	19121		5
41508	909	2016 W NORRIS ST	19121		4

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
41523	909	1830 N 26TH STREET	19121		5
41557	909	2940 PAGE ST	19121		3
41573	909	1936 N TAYLOR ST	19121		3
41598	909	2101 N WOODSTOCK ST	19121		5
41632	909	2026 N 18TH STREET	19121		5
41642	909	1903 N 32ND STREET	19121		5
41715	909	2017 N BAMBREY ST	19121		3
41721	909	1835 N VAN PELT ST	19121		6
41755	909	2010 N WOODSTOCK ST	19121		5
41758	909	2156 N MARSTON ST	19121		3
41793	909	2031 DIAMOND ST	19121	A	3
41794	909	2031 DIAMOND ST	19121	B	3
41795	909	2031 DIAMOND ST	19121	C	3
41807	909	2123 N 15TH STREET	19121	B	6
41824	909	2037 N 19TH STREET	19121	A	2
41825	909	2037 N 19TH STREET	19121	B	6
41904	909	2031 N 22ND STREET	19121	A	4
41905	909	2031 N 22ND STREET	19121	B	5
41906	909	2031 N 22ND STREET	19121	C	5
41921	909	1923 N 19TH STREET	19121	A	2
41922	909	1923 N 19TH STREET	19121	B	4
41986	909	2120 N 19TH STREET	19121		6
42049	909	1908 N 18TH STREET	19121	A	2
42050	909	1908 N 18TH STREET	19121	B	6
42275	909	1731 W MONTGOMERY AVE	19121	A	3
42276	909	1731 W MONTGOMERY AVE	19121	B	4
42277	909	1731 W MONTGOMERY AVE	19121	C	1
42294	909	1904 MONUMENT AVE	19121		3
42304	909	1823 N 21ST STREET	19121		5
42306	909	2235 W NORRIS ST	19121	A	3
42307	909	2235 W NORRIS ST	19121	B	5
42310	909	2129 N 22ND STREET	19121	A	2
42311	909	2129 N 22ND STREET	19121	B	5
42373	909	2030 DIAMOND ST	19121	A	2
42374	909	2030 DIAMOND ST	19121	B	3
42375	909	2030 DIAMOND ST	19121	C	3
42441	909	2043 DIAMOND ST	19121	A	3
42442	909	2043 DIAMOND ST	19121	B	4
42443	909	2043 DIAMOND ST	19121	C	2
42473	909	1807 N 18TH STREET	19121	A	3
42474	909	1807 N 18TH STREET	19121	B	4

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
42517	909	1937 N 18TH STREET	19121	A	2
42518	909	1937 N 18TH STREET	19121	B	5
42519	909	1914 DIAMOND ST	19121	A	3
42520	909	1914 DIAMOND ST	19121	B	6
42599	909	1904 W NORRIS ST	19121	A	1
42600	909	1904 W NORRIS ST	19121	B	3
42653	909	1840 N 18TH STREET	19121	A	2
42654	909	1840 N 18TH STREET	19121	B	3
42655	909	1840 N 18TH STREET	19121	C	3
42703	909	1943 N 19TH STREET	19121	A	2
42704	909	1943 N 19TH STREET	19121	B	4
42705	909	2005 N 22ND STREET	19121	A	3
42706	909	2005 N 22ND STREET	19121	B	4
42707	909	2005 N 22ND STREET	19121	C	4
42708	909	2007 N 22ND STREET	19121	A	3
42709	909	2007 N 22ND STREET	19121	B	4
42710	909	2007 N 22ND STREET	19121	C	4
42723	909	1904 N 21ST STREET	19121	A	2
42724	909	1904 N 21ST STREET	19121	B	4
42790	909	1909 N 19TH STREET	19121	A	4
42791	909	1909 N 19TH STREET	19121	B	4
42792	909	2033 N 22ND STREET	19121	A	4
42793	909	2033 N 22ND STREET	19121	B	4
42794	909	2033 N 22ND STREET	19121	C	4
42795	909	1917 N 24TH STREET	19121		5
42856	909	2112 N UBER ST	19121	A	2
42857	909	2112 N UBER ST	19121	B	6
42865	909	3044 W SUSQUEHANNA AVE	19121	A	1
42866	909	3044 W SUSQUEHANNA AVE	19121	B	4
42880	909	1850 N 17TH STREET	19121	A	2
42881	909	1850 N 17TH STREET	19121	B	6
42882	909	2124 N 21ST STREET	19121	A	2
42883	909	2124 N 21ST STREET	19121	C	4
42902	909	2008 N 19TH STREET	19121	A	3
42903	909	2008 N 19TH STREET	19121	B	3
42974	909	2172 N DOVER ST	19121		2
42996	909	1839 N 31ST STREET	19121		5
43001	909	2108 N 16TH STREET	19121	A	2
43002	909	2108 N 16TH STREET	19121	B	5
43069	909	1936 N GRATZ ST	19121	A	1
43070	909	1936 N GRATZ ST	19121	B	4

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
43146	909	1913 N 18TH STREET	19121	A	2
43147	909	1913 N 18TH STREET	19121	B	6
43159	909	2122 N 16TH STREET	19121	A	3
43160	909	2122 N 16TH STREET	19121	B	3
43161	909	2122 N 16TH STREET	19121	C	3
43204	909	1944 N 22ND STREET	19121	A	3
43205	909	1944 N 22ND STREET	19121	B	4
43244	909	2153 N 15TH STREET	19121	A	3
43245	909	2153 N 15TH STREET	19121	B	3
43246	909	2153 N 15TH STREET	19121	C	3
43247	909	1802 N 18TH STREET	19121	A	2
43248	909	1802 N 18TH STREET	19121	B	4
43249	909	1802 N 18TH STREET	19121	C	3
43278	909	2009 N VAN PELT ST	19121		3
43324	909	2215 W MONTGOMERY AVE	19121		5
43384	909	1737 W BERKS ST	19121	A	3
43385	909	1737 W BERKS ST	19121	B	4
43402	909	2112 N 16TH STREET	19121	A	4
43403	909	2112 N 16TH STREET	19121	B	5
43404	909	2120 N 16TH STREET	19121	A	4
43405	909	2120 N 16TH STREET	19121	B	4
43449	909	3014 W BERKS ST	19121	A	1
43450	909	3014 W BERKS ST	19121	B	3
43454	909	1904 N 18TH STREET	19121	A	2
43455	909	1904 N 18TH STREET	19121	B	6
43516	909	1833 N 21ST STREET	19121		5
43560	909	2127 N 18TH STREET	19121	A	4
43561	909	2127 N 18TH STREET	19121	B	4
43619	909	1540 DIAMOND ST	19121	A	4
43620	909	1540 DIAMOND ST	19121	B	3
43621	909	1540 DIAMOND ST	19121	C	4
43679	909	3101 EUCLID ST	19121	A	4
43680	909	3101 EUCLID ST	19121	B	4
43819	909	1851 N 19TH STREET	19121	A	3
43820	909	1851 N 19TH STREET	19121	B	3
43873	909	2002 N 17TH STREET	19121	A	3
43874	909	2002 N 17TH STREET	19121	B	4
43910	909	1941 N 19TH STREET	19121	A	3
43911	909	1941 N 19TH STREET	19121	B	3
43912	909	1941 N 19TH STREET	19121	C	3
43918	909	2121 N 15TH STREET	19121	A	1

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
43919	909	2121 N 15TH STREET	19121	B	6
43986	909	2504 DIAMOND ST	19121	A	4
43987	909	2504 DIAMOND ST	19121	B	4
124828	909	2023 W MONTGOMERY AVE	19121		5
124830	909	2330 W BERKS ST	19121		6
124893	909	2024 W NORRIS ST	19121		6
124968	909	3103 EUCLID ST	19121		5
124977	909	1722 FONTAIN ST	19121		5
124993	909	2007 N VAN PELT ST	19121		3
125011	909	2025 W MONTGOMERY AVE	19121		5
125028	909	1926 W NORRIS ST	19121		5
125101	909	2036 N WOODSTOCK ST	19121		5
125107	909	1729 W NORRIS ST	19121	A	3
125108	909	1729 W NORRIS ST	19121	B	4
125138	909	1847 N JUDSON ST	19121		3
125140	909	1906 W NORRIS ST	19121		5
125197	909	1918 W NORRIS ST	19121		2
125233	909	1935 W NORRIS ST	19121		5
125284	909	2027 W MONTGOMERY AVE	19121		5
125339	909	1914 N 24TH STREET	19121		6
125345	909	3129 PAGE ST	19121		5
125390	909	1902 N 32ND STREET	19121		5
125484	909	1840 N ETTING ST	19121		2
125520	909	2023 N 18TH STREET	19121		6
125870	909	1846 N ETTING ST	19121		2
125903	909	1943 N 18TH STREET	19121		5
125904	909	2023 N 19TH STREET	19121		6
255946	909	1940 N 18TH STREET	19121	A	3
255947	909	1940 N 18TH STREET	19121	B	4
255948	909	1938 N 18TH STREET	19121	A	3
255949	909	1938 N 18TH STREET	19121	B	4
690009	909	2228 PAGE ST	19121		3
690013	909	1812 N 27TH STREET	19121		5
690071	909	1822 N 26TH STREET	19121		5
690105	909	2010 N 20TH STREET	19121		5
690181	909	1932 N TAYLOR ST	19121		3
690217	909	1914 N 18TH STREET	19121		6
690305	909	2123 N STANLEY ST	19121		3
690414	909	2009 N LAMBERT ST	19121		5
690557	909	1825 N 26TH STREET	19121		3
690595	909	1833 N TANEY ST	19121		3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
690780	909	1842 N MARSTON ST	19121		2
690783	909	1821 N MARSTON ST	19121		2
691281	909	2121 N 19TH STREET	19121	A	2
691282	909	2121 N 19TH STREET	19121	B	6
691417	909	1948 N 18TH STREET	19121		6
804032	909	3012 W BERKS ST	19121		5
804119	909	1721 W NORRIS ST	19121	A	3
804120	909	1721 W NORRIS ST	19121	B	4
804126	909	2022 W NORRIS ST	19121		6
804156	909	3155 EUCLID ST	19121	A	3
804157	909	3155 EUCLID ST	19121	B	4
804199	909	2833 DIAMOND ST	19121	A	2
804200	909	2833 DIAMOND ST	19121	B	6
804231	909	2118 N 16TH STREET	19121	A	3
804232	909	2118 N 16TH STREET	19121	B	3
804249	909	2021 N 17TH STREET	19121	A	3
804250	909	2021 N 17TH STREET	19121	B	5
804298	909	2012 N 22ND STREET	19121	A	5
804299	909	2012 N 22ND STREET	19121	B	5
804300	909	2012 N 22ND STREET	19121	C	5
804330	909	1738 MONUMENT AVE	19121	A	3
804331	909	1738 MONUMENT AVE	19121	B	3
804368	909	1946 N 19TH STREET	19121	A	3
804369	909	1946 N 19TH STREET	19121	B	5
804377	909	1735 W BERKS ST	19121	A	3
804378	909	1735 W BERKS ST	19121	B	4
804404	909	1908 N 24TH STREET	19121	A	3
804405	909	1908 N 24TH STREET	19121	B	2
804421	909	1911 N 19TH STREET	19121	A	4
804422	909	1911 N 19TH STREET	19121	B	5
804435	909	1915 N 19TH STREET	19121	A	2
804436	909	1915 N 19TH STREET	19121	B	3
804437	909	1915 N 19TH STREET	19121	C	3
804605	909	2003 N 18TH STREET	19121	A	4
804606	909	2003 N 18TH STREET	19121	B	4
804634	909	1929 DIAMOND ST	19121	A	3
804635	909	1929 DIAMOND ST	19121	B	2
804636	909	1929 DIAMOND ST	19121	C	3
804649	909	1856 N VAN PELT ST	19121	A	4
804650	909	1856 N VAN PELT ST	19121	B	4
804763	909	2137 N 15TH STREET	19121	A	2

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
804764	909	2137 N 15TH STREET	19121	B	4
818034	909	1867 N JUDSON ST	19121		3
818129	909	1921 N 24TH STREET	19121		5
818145	909	1927 N NAPA ST	19121		3
818152	909	2139 N 19TH STREET	19121		6
818298	909	2222 DIAMOND ST	19121		6
818358	909	1955 N 23RD STREET	19121		3
818386	909	2114 N 19TH STREET	19121		6
818472	909	1826 N BUCKNELL ST	19121		3
818481	909	3024 W BERKS ST	19121		5
818530	909	1923 N 24TH STREET	19121		5
818536	909	3127 PAGE ST	19121		5
888563	909	3127 W MONTGOMERY AVE	19121		6
926765	909	1946 N NEWKIRK ST	19121		3
41517	910	2407 REDNER ST	19121		4
41531	910	2126 W MASTER ST	19121		5
41667	910	1411 N 22ND STREET	19121		5
41685	910	1736 N HOLLYWOOD ST	19121		2
41696	910	2429 BOLTON WAY (Street)	19121		4
41697	910	2431 BOLTON WAY (Street)	19121		4
41744	910	2703 W JEFFERSON ST	19121		5
41830	910	2230 INGERSOLL ST	19121		4
41980	910	2223 STEWART ST	19121		2
41992	910	2145 SHARSWOOD ST	19121		5
41993	910	2147 SHARSWOOD ST	19121		5
41994	910	2149 SHARSWOOD ST	19121		5
41995	910	2429 NICHOLAS ST	19121		5
42052	910	2436 REDNER ST	19121		4
42171	910	2138 HARLAN ST	19121		2
42172	910	2140 HARLAN ST	19121		2
42226	910	2302 STEWART ST	19121		2
42227	910	2308 STEWART ST	19121		2
42228	910	2330 STEWART ST	19121		2
42326	910	1509 N MARSTON ST	19121		3
42388	910	2218 INGERSOLL ST	19121		5
42417	910	1627 N 21ST STREET	19121		5
42426	910	2417 REDNER ST	19121		4
42429	910	2415 CLIFFORD ST	19121		6
42494	910	1718 N 22ND STREET	19121	A	3
42495	910	1718 N 22ND STREET	19121	B	3
42496	910	1511 N MARSTON ST	19121		3

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
42552	910	2417 N COLLEGE AVE	19121	A	2
42553	910	2417 N COLLEGE AVE	19121	B	6
42637	910	1205 N ETTING ST	19121		2
42677	910	2343 W MASTER ST	19121		4
42691	910	2042 NICHOLAS ST	19121		4
42730	910	1216 N PENNOCK ST	19121		2
42748	910	2426 REDNER ST	19121		4
42819	910	2313 HARLAN ST	19121		2
42820	910	2324 HARLAN ST	19121		2
42837	910	2320 STEWART ST	19121		2
42838	910	2423 STEWART ST	19121		2
42975	910	2024 SEYBERT ST	19121		2
42991	910	1551 N MARSTON ST	19121		3
42995	910	2324 SHARSWOOD ST	19121		5
43005	910	2512 HARLAN ST	19121		2
43006	910	2514 HARLAN ST	19121		2
43010	910	2455 TURNER ST	19121	A	3
43011	910	2455 TURNER ST	19121	B	3
43049	910	1236 N 27TH STREET	19121		6
43185	910	2342 STEWART ST	19121		2
43251	910	2437 REDNER ST	19121		4
43286	910	2511 HARLAN ST	19121		3
43313	910	1439 N MARSTON ST	19121		2
43325	910	2314 SHARSWOOD ST	19121		4
43331	910	1229 N ETTING ST	19121		3
43354	910	2221 STEWART ST	19121		2
43410	910	1419 N MYRTLEWOOD ST	19121		2
43431	910	2437 BOLTON WAY (Street)	19121		4
43447	910	1527 N 22ND STREET	19121		5
43474	910	1740 N NATRONA ST	19121		5
43484	910	2204 INGERSOLL ST	19121		5
43489	910	2338 W MONTGOMERY AVE	19121		5
43529	910	3211 CECIL B MOORE AVE	19121	A	3
43530	910	3211 CECIL B MOORE AVE	19121	B	3
43531	910	3211 CECIL B MOORE AVE	19121	C	3
43625	910	2721 W GEORGE ST	19130		2
43691	910	1400 N MARSTON ST	19121		5
43692	910	1715 N 31ST STREET	19121		5
43702	910	2707 W GEORGE ST	19130		2
43781	910	2409 BOLTON WAY (Street)	19121		4
43782	910	2413 BOLTON WAY (Street)	19121		4

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
43827	910	2440 NICHOLAS ST	19121		5
43836	910	1451 N MARSTON ST	19121		2
43913	910	1535 N 22ND STREET	19121		5
43950	910	1716 N BONSALL ST	19121		4
124818	910	1303 N 24TH STREET	19121		5
124824	910	2401 HARLAN ST	19121		5
124844	910	2410 REDNER ST	19121		4
124854	910	1412 N 27TH STREET	19121		4
124905	910	1270 N DOVER ST	19121		6
124983	910	1519 N MARSTON ST	19121		3
125001	910	2024 NICHOLAS ST	19121		4
125057	910	2232 INGERSOLL ST	19121		5
125113	910	2403 CECIL B MOORE AVE	19121	A	3
125114	910	2403 CECIL B MOORE AVE	19121	B	4
125159	910	2008 S COLLEGE AVE	19121		5
125176	910	2026 NICHOLAS ST	19121		4
125191	910	2402 BOLTON WAY (Street)	19121		4
125217	910	1619 N 21ST STREET	19121		5
125254	910	2406 REDNER ST	19121		4
125255	910	2431 STEWART ST	19121		2
125273	910	1430 N MYRTLEWOOD ST	19121		2
125293	910	1742 N NATRONA ST	19121		5
125349	910	1507 N 25TH STREET	19121		5
125372	910	2224 W JEFFERSON ST	19121		3
125391	910	1323 N 23RD STREET	19121		4
125407	910	2424 W OXFORD ST	19121		5
125411	910	1458 N MARSTON ST	19121		2
125482	910	2425 NASSAU ST	19121		2
125497	910	1239 N 30TH STREET	19121		2
125507	910	3041 W HARPER ST	19130		3
125516	910	2437 NICHOLAS ST	19121		5
125524	910	2311 HARLAN ST	19121		2
125544	910	1416 N MARSTON ST	19121		2
125584	910	2336 STEWART ST	19121		2
125618	910	2415 W OXFORD ST	19121		6
125640	910	1428 N MARSTON ST	19121		2
125643	910	1434 N MARSTON ST	19121		2
125665	910	1223 N MYRTLEWOOD ST	19121		3
125701	910	1746 N LAMBERT ST	19121		3
125715	910	2429 INGERSOLL ST	19121		2
125723	910	2437 INGERSOLL ST	19121		2

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
125728	910	2441 INGERSOLL ST	19121		2
125738	910	1415 N MARSTON ST	19121		2
125756	910	2411 INGERSOLL ST	19121		2
125757	910	2416 INGERSOLL ST	19121		2
125776	910	1462 N MYRTLEWOOD ST	19121		3
125810	910	2419 REDNER ST	19121		4
125821	910	1526 N 20TH STREET	19121		5
125822	910	2427 INGERSOLL ST	19121		2
125864	910	1235 N 30TH STREET	19121		2
125868	910	2412 NASSAU ST	19121		2
125878	910	920 N 30TH STREET	19130		3
125928	910	1446 N 27TH STREET	19121		4
125931	910	1426 N MYRTLEWOOD ST	19121		2
255954	910	2412 REDNER ST	19121		4
690011	910	1608 N NEWKIRK ST	19121		3
690023	910	1242 N DOVER ST	19121		3
690024	910	1317 N 23RD STREET	19121		6
690052	910	1427 N HOLLYWOOD ST	19121		3
690056	910	1246 N DOVER ST	19121		3
690119	910	2430 CLIFFORD ST	19121		5
690268	910	1508 N 24TH STREET	19121		5
690406	910	1236 N DOVER ST	19121		3
690428	910	2448 NASSAU ST	19121		2
690462	910	2711 CABOT ST	19121		3
690612	910	2424 CLIFFORD ST	19121		6
690619	910	2313 W THOMPSON ST	19121		4
690684	910	1216 N 30TH STREET	19121		6
690685	910	2425 CECIL B MOORE AVE	19121		6
690808	910	2441 W OXFORD ST	19121	A	2
690809	910	2441 W OXFORD ST	19121	B	4
690816	910	1232 N DOVER ST	19121		3
690981	910	2425 CLIFFORD ST	19121		5
691034	910	1310 N 23RD STREET	19121		5
691058	910	2438 CLIFFORD ST	19121		6
803998	910	2237 W THOMPSON ST	19121	A	3
803999	910	2237 W THOMPSON ST	19121	B	4
804044	910	2430 REDNER ST	19121		4
804256	910	2702 W GEORGE ST	19130		2
804257	910	2705 W GEORGE ST	19130		2
804258	910	2709 W GEORGE ST	19130		2
804259	910	2710 W GEORGE ST	19130		2

Unit ID	AMP	Unit Address	Zip Code	Apt #	BR Size
804282	910	2704 W GEORGE ST	19130		2
804283	910	2708 W GEORGE ST	19130		2
804290	910	2712 W GEORGE ST	19130		2
804318	910	2714 W GEORGE ST	19130		2
804379	910	2351 N COLLEGE AVE	19121	A	3
804380	910	2351 N COLLEGE AVE	19121	B	6
804396	910	1515 N 25TH STREET	19121	A	1
804397	910	1515 N 25TH STREET	19121	B	5
804398	910	2726 W GEORGE ST	19130		2
804399	910	2727 W GEORGE ST	19130		2
804400	910	2729 W GEORGE ST	19130		2
804406	910	2725 W GEORGE ST	19130		2
804438	910	2711 W GEORGE ST	19130		2
804439	910	2715 W GEORGE ST	19130		2
804440	910	2717 W GEORGE ST	19130		2
804441	910	2723 W GEORGE ST	19130		2
804571	910	2410 CECIL B MOORE AVE	19121		5
804572	910	3128 CLIFFORD ST	19121	A	1
804573	910	3128 CLIFFORD ST	19121	B	4
804576	910	1300 N DOVER ST	19121		6
804745	910	2231 W OXFORD ST	19121		5
804757	910	1460 N MARSTON ST	19121		2
804765	910	2000 W OXFORD ST	19121	A	2
804766	910	2000 W OXFORD ST	19121	B	1
804767	910	2000 W OXFORD ST	19121	C	3
818130	910	2431 CLIFFORD ST	19121		6
818202	910	2928 W MASTER ST	19121		4
818226	910	2042 W MASTER ST	19121		5
818303	910	1706 N 27TH STREET	19121		5
818326	910	2436 CECIL B MOORE AVE	19121		6
818327	910	2447 NICHOLAS ST	19121		5
818363	910	2050 W MASTER ST	19121		5
818368	910	2415 TURNER ST	19121		5
818369	910	2707 W JEFFERSON ST	19121		3
888642	910	1715 N 26TH STREET	19121		6
888809	910	2449 NICHOLAS ST	19121		5

Appendix F: MTW TDC/HCC

PHA's current HUD-approved MTW TDC and HCC cost limits are shown below. PHA last updated the MTW TDC/HCC cost limits in 2009. Subject to HUD approval, PHA will periodically review and update the MTW TDC/HCC cost limits.

	0		1		2		3		4		5	
Type of Unit	**HCC**	**TDC**	**HCC**	**TDC**	**HCC**	**TDC**	**HCC**	**TDC**	**HCC**	**TDC**	**HCC**	**TDC**
Detached			$225,373	$394,402	$266,207	$465,863	$319,931	$559,880	$374,708	$655,740	$429,310	$751,292
Row House			$203,374	$355,904	$239,263	$418,710	$287,115	$502,451	$334,969	$586,195	$382,821	$669,937
Walk-up	$176,055	$308,097	$176,055	$308,097	$203,708	$356,490	$269,787	$472,286	$331,729	$580,525	$390,368	$683,144
Elevator			$213,541	$341,665	$249,365	$398,985	$331,717	$530,747	$411,330	$658,128	$486,550	$778,480

Appendix G: Impact Analyses: Rent Simplification

Pursuant to the Moving To Work (MTW) Agreement, the Philadelphia Housing Authority (PHA) conducted an income and rent analysis of MTW households. Low Income Housing Tax Credit sites managed by PAPMC, Moderate Rehab units and non-MTW vouchers are not subject to rent simplification and are not included in this analysis.

PHA's rent simplification program currently includes the following components:

- A single working household deduction;
- An asset income exclusion;
- Exclusion of full-time student earned income;
- Modification of the definition of medical related expenses to include only certain medical-related insurance premiums;
- Elimination of all other deductions;
- Application of a cap on gas utility allowances for income eligible households who are responsible for gas heat;
- Reduction of the standard rent calculation percentage based on family size; and
- Application of a minimum rent of $50.

The following is a summary of the results of the rent impact analysis.

Affordability

PHA's MTW rent policies resulted in affordable household rents in both the public housing and HCV programs. The following chart shows average Total Tenant Payment (TTP) as a percentage of adjusted income. The chart excludes households earning $2,100 or less annually, who are subject to a minimum rent payment and, therefore, tend to pay a higher percentage of income towards rent and HCV households with a gross rent that exceeds their payment standard, who also pay a higher percentage of income towards rent. Alternatively, higher income PH households on ceiling rent pay a lower percentage of their gross income. Table 1 highlights the fact that for all households earning more than $2,100 annually, MTW residents pay 28% or less of adjusted income as Total Tenant Payment. Note that HCV households have the choice to select a housing unit that exceeds established Payment Standards, a choice that results in the tenant paying a higher percentage of adjusted income towards rent.

Table 1:
Total Tenant Payment as a Percentage of Adjusted Income

	Housing Choice Voucher Households	Public Housing Households
Average	28%	28%
25th Percentile	27%	27%
Median	28%	28%
75th Percentile	28%	28%
Max	28%	28%

CRP

Under MTW, HCV Tenant-Based households who are responsible for paying gas heat and who are income eligible to participate in the PGW Customer Responsibility Program (CRP) have the gas portion of their utility allowances calculated using PHA's CRP MTW utility policy. Participation in the PGW CRP program places a cap on the amount of money that eligible tenants will be required to pay for their gas utility payments based on household income, not consumption. Gas utility allowances are calculated using the PGW CRP calculation method. Table 2 illustrates the current annual savings resulting from PHA's adoption of this policy.

Table 2: Utility Allowance Savings due to CRP MTW UA Policy

	Households on CRP
# of HCV participants who are eligible for a gas utility allowance	13,644
# of HCV participants who pay gas heat and are eligible for CRP	3,808
Total gas portion without application of CRP	$798,724
Total gas portion with application of CRP	$664,496
Monthly Savings	$134,228
Annual Savings to PHA	**$1,610,736**

Appendix H: RAD Significant Amendment

Philadelphia Housing Authority
Fiscal Year 2020 Moving to Work Annual Plan
Rental Assistance Demonstration Significant Amendment

The Philadelphia Housing Authority (PHA) is incorporating this Rental Assistance Demonstration (RAD) Significant Amendment into its Fiscal Year 2020 Moving to Work (MTW) Annual Plan as required by the US Department of Housing and Urban Development (HUD). The amendment provides information on PHA's planned activities under the Rental Assistance Demonstration (RAD) program. Pursuant to this amendment, PHA will convert 78 vacant, non-viable public housing units located at various scattered site locations in Philadelphia to project-based assistance at a new construction housing development to be known as Susquehanna Housing as described herein. The conversion will utilize the "transfer of assistance" provisions of RAD.

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 for multiple housing developments, 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. PHA intends to proceed with RAD conversion and transfer of assistance for certain scattered site public housing units pursuant to the guidelines of PIH Notice 2012-32, REV-3 dated January 12, 2017 and PIH Notice 2016-17 dated November 10, 2016 ("HUD RAD Notices") 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 units. PHA intends to propose further Significant Amendment(s) for additional HUD-approved RAD conversions at future dates. PHA will provide a thirty-day comment period from November 1, 2018 to December 3, 2018, and conduct a Public Hearing on November 27, 2018 to allow residents and the general public an opportunity to review and comment on the RAD Significant Amendment. The PHA Board of Commissioners will conduct a vote on the RAD Significant Amendment at a public meeting in December 2018 as part of the approval for the FY 2020 MTW Annual Plan.

RAD Conversion Plan

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

- A total of 78 vacant, non-viable public housing units at various scattered site locations owned by PHA. The public housing assistance for these units will be converted and transferred to Project Based Voucher (PBV) assistance at a new construction housing development to be known as Susquehanna Housing. The development will be owned by Susquehanna Net Zero Housing LP.

Attachment 1 includes current information on the proposed RAD conversion project. 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. Under this Amendment, all assistance will be transferred to a new construction development.
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 Notices 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 most recent Capital Fund allocation for the 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 approximately $347,800 based on Federal FY2018 funding levels. Over a five-year period, the estimated Capital Fund reduction is approximately $1,739,000 based on Federal FY2018 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 conversions will not impact PHA's existing Capital Fund Financing Program (CFFP) obligations. PHA currently projects that it will utilize MTW Block Grant funds for capital improvements and to establish a RAD reserve for the subject developments. Actual figures will be determined as part of the final financing plan.

Site and Neighborhood Standards

The RAD conversions described herein comply with all applicable site selection and neighborhood reviews standards.

Relocation Plan

Any necessary resident relocation related to RAD conversions will be performed in accordance with the HUD RAD Notices. No relocation is required for the RAD conversions described herein as all units to be converted are vacant, non-viable scattered site units.

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 subject to funding availability. 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 schedules 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
Moving to Work Annual Plan Amendment
Rental Assistance Demonstration Significant Amendment
Attachment 1 – Information on Public Housing Developments to be Converted

The following page provides 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 Scattered Sites

PIC Development ID # PA002000901, PA002000902, PA002000903, PA002000905, PA002000909
Conversion Type (PBV or PBRA) PBV
Capital Fund Grant (FFY18) $347,800

Pre-Conversion Total Units 78
Pre-Conversion Unit Type Scattered Sites

Pre-Conversion Bedroom Size

	PA002000901	PA002000902	PA002000903	PA002000905	PA002000909
	# of Units	**# of Units**	**# of Units**	**# of Units**	**# of Units**
0 BR					
1 BR					
2 BR		1	1		
3 BR	10	14	15		9
4 BR	3	1	1		2
5 BR		9		8	
6 BR		2		2	

Post-Conversion Total Units 78
Post-Conversion RAD Units 78
Post-Conversion Unit Type PBV
Post- Conversion Development Name and Address Susquehanna Housing (27th & Susquehanna)
2610-16 West Fletcher Street
Post - Conversion Sponsor Susquehanna Net Zero Housing, LP
Project Description Susquehanna Housing (27th & Susquehanna) is a seventy-eight (78) unit, 55 and over, affordable housing development that will be constructed at 27th and Susquehanna. All of the seventy-eight (78) units will be under HUD's Rental Assistance Demonstration Program ("RAD"). The project will be developed on an area bounded by the 2600 block of Susquehanna Avenue to the south, the 2200 block of North 27th Street to the west, the 2600 block of West Fletcher Street to the north, and the 2200 block of North 26th Street to the east. The development will include seventy-eight (78) one-bedroom units in one building. There will be a Community Life Center adjacent to the building.

Post-Conversion Bedroom Size

	Total # of Units	**# of RAD Units**
0 BR		
1 BR	78	78
2 BR		
3 BR		
4 BR		
5 BR		
6 BR		

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.

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-3 dated January 12, 2017, Sections 1.6.C and 1.6.D

HUD Joint Housing Notice H-2016-17, PIH-2016-17 dated November 10, 2016 in its entirety.

C. <u>PBV Resident Rights and Participation.</u>

1. **No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.[32] Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). 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 of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, this provision shall apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units

[32] These protections (as well as all protections in this Notice for current households) also apply when a household is relocated to facilitate new construction or repairs following conversion and subsequently returns to the Covered Project.

will otherwise be subject to all requirements of the applicable program, specifically 24 CFR § 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.[33]

2. **Right to Return.** See section 1.4.A.5(ii) and the RAD Fair Housing, Civil Rights, and Relocation Notice 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 part 983 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.

   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 "Calculated PBV 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:

[33] For non-RAD PBV households, applicable program requirements includes the requirement that any admission to the 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.

- 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 Calculated PBV TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full Calculated PBV TTP [34]

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 Calculated PBV TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications – Full Calculated PBV TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the Calculated PBV 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 must also implement a three or five-year phase-in for impacted residents, but may alter the terms above as long as it establishes a written policy setting forth the alternative terms.

5. **Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are currently FSS participants will continue to be eligible for FSS once their housing is converted under RAD. The PHA may continue to use any FSS funds already awarded

[34] For example, where a resident's most recently paid TTP is $100, but the Calculated PBV TTP is $200 and remains $200 for the period of the resident's occupancy, (i.e. no changes in income) the resident would continue to pay the same rent and utilities for which it was responsible prior to conversion. At the first recertification following conversion, the resident's contribution would increase by 33% of $100 to $133. At the second AR, the resdient's contribution would increase by 50% of the $66 differential to the standard TPP, increasing to $166. At the third AR, the resident's contribution would increase to $200 and the resident would continue to pay the Calculated PBV TTP for the duration of their tenancy.

to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding and may use that funding to serve PH, HCV and/or PBRA participants in its FSS program. 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 subsequent Appropriation Acts), 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.[35] 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.

For information on FSS PIC reporting requirements for RAD conversions, see Notice PIH 2016-08 at http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016-08.pdf.

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. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the

[35] 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.

grant agreement. Please note that ROSS-SC grantees may be a non-profit or local Resident Association and this consequence of a RAD conversion may impact those entities.

6. **Resident Participation and Funding.** In accordance with Attachment 1B, residents of Covered Projects with assistance converted to PBV 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.

   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 be :
      a. A reasonable period of time, but not to exceed 30 days:
         ii. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
         iii. In the event of any drug-related or violent criminal activity or any felony conviction;
      b. Not less than 14 days in the case of nonpayment of rent; and
      c. Not less than 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 resident 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),[36] 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.
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

[36] § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed.

provision in 24 CFR § 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 that move into the property following conversion or tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion due to loss of employment) 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 relocation 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 select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). 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 result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after 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 the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving 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.[37] 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

[37] 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.

requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. 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. 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.

11. **Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR § 983.260 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 § 983.260 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 and the Project Owner must cooperate with 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 Owner must submit to the administering PHA and the PHA's Board must approve the operating budget for the Covered Project annually in accordance with HUD requirements.[38]

[38] 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 monitoring and evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

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.
   ii. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
   iii. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
   iv. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

   For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

   To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

   If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at other sites.

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 Covered 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. 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).[39]

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

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 shall administer its waiting list for the Covered 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.8.

7. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing

[39] 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.

which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC.

8. **Administrative Fees for Public Housing Conversions During the Year of Conversion**. For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the "year of conversion"), 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 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 HAP 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.

   PHAs operating HCV program typically receive 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 Work Responsibility Act of 1998" and 24 CFR § 982.152(b). During the year of conversion mentioned in the preceding paragraph, these provisions are waived. PHAs will not receive Section 8 administrative fees for PBV RAD units during the year of conversion.

   After the year of conversion, 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) of the Act and 24 CFR § 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 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.

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Office of Public and Indian Housing
Office of Housing

Special Attention of: Public Housing Agencies Public Housing Hub Office Directors Public Housing Program Center Directors Multifamily HUB Directors Multifamily Program Center Directors Regional and Field Office Directors Regional Administrators Performance Based Contract Administrators RAD Transaction Managers Regional Relocation Specialists	**Notice** H 2016-17 PIH 2016-17 (HA) Issued: November 10, 2016 Effective: November 10, 2016 Expires: This Notice remains in effect until amended, superseded, or rescinded Supplements: PIH Notice 2012-32 (HA) REV-2 Supersedes: H 2014-09/PIH 2014-17

SUBJECT: Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions.[1]

SECTION 1. Purpose, Applicability and Major Provisions of this Notice

1.1. Purpose

This notice (Notice) provides PHAs,[2] Project Owners, and their RAD development partners with guidance regarding key fair housing and civil rights statutory and regulatory requirements, explains the situations in which HUD is requiring front-end fair housing and civil rights reviews, and provides information regarding the types of information that must be submitted to facilitate HUD's review of certain fair housing and civil rights requirements in connection with public housing conversions under the First Component of RAD. This Notice also includes guidance

[1] While this Notice addresses fair housing and civil rights requirements and relocation requirements, the fair housing and civil rights requirements are not limited to relocation issues.
[2] Consistent with PIH Notice 2012-32 (HA) REV-2 (PIH 2012-32 (HA) REV-2) (the "RAD Notice"), this Notice uses the term "PHA" to refer to the owner of the project prior to the RAD conversion and "Project Owner" to refer to the owner of the project after the RAD conversion.

regarding key relocation statutory and regulatory requirements, and details relocation requirements under RAD. This Notice only applies to projects converting under the First Component of RAD; it does not apply to the Second Component of RAD.[3]

The RAD program was established as a tool for preserving and improving low-income housing stock. RAD is intended to facilitate reinvestment in or redevelopment of the long-term-affordable stock of HUD-assisted housing properties. RAD also provides mobility benefits for assisted residents of converted properties through the choice mobility option, allowing these households to access tenant-based Housing Choice Vouchers. In some cases, RAD can be a tool for transfer of rental assistance from distressed or poorly selected sites to new sites in high opportunity areas. In all cases, the objective is to better serve low-income residents and the broader community in complying with fair housing, other civil rights, and relocation laws.

This Notice provides PHAs and Project Owners with guidance relating to planning and implementing public housing (First Component) RAD conversions in a manner consistent with existing fair housing and other civil rights requirements, including, but not limited to, those associated with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, Titles II and III of the Americans with Disabilities Act, the Architectural Barriers Act of 1968, and their implementing regulations. Section 4 of this Notice summarizes key provisions of existing law applicable to RAD transactions.

To further compliance with these existing requirements, PIH 2012-32 (HA) REV-2, issued June 15, 2015 (the "RAD Notice") established that specific PHA decisions and activities planned to be part of a First Component RAD conversion must be reviewed by HUD prior to implementation (the "front-end" fair housing and civil rights reviews). Through a front-end review of the enumerated PHA decisions, HUD seeks to assist PHAs and Project Owners in meeting their fair housing, other civil rights, and relocation obligations. Section 5 of this Notice explains the situations in which HUD is requiring front-end fair housing, other civil rights, and relocation reviews, details the procedures for HUD's front-end review and the type of information that must be submitted for these reviews, and the timeframes for these reviews.

Finally, in Sections 6 and 7 this Notice provides PHAs and Project Owners with guidance regarding RAD program and other statutory and regulatory relocation assistance requirements when planning for or implementing resident moves as a result of a conversion of a public housing project under RAD. This guidance includes reiterated and new requirements, the corresponding required reviews, and explanation of the interaction between RAD relocation procedures and certain existing public housing requirements. PHAs and Project Owners implementing RAD transactions may be subject to (a) the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA),

[3] Important fair housing, other civil rights, and relocation considerations apply also to the Second Component of RAD as provided in the RAD Notice. Participants in the Second Component of RAD must continue to comply with applicable fair housing, civil rights, and relocation statutes and regulations, and HUD may, at any time, initiate compliance or enforcement actions in connection with such requirements. The RAD Notice will continue as the primary source of information on fair housing and other civil rights requirements covering the Second Component of RAD without any change until further notice.

(b) the requirements of Section 104(d) of the Housing and Community Development Act of 1974 (Section 104(d)) if CDBG or HOME funds are included as part of the project, (c) fair housing and other civil rights considerations implicated by relocation activities, and (d) requirements for relocating residents under the RAD Notice.

1.2. PHA and Project Owner Responsibilities

This Notice explains RAD's front-end fair housing and other civil rights review requirements in greater detail than was provided in the RAD Notice and this Notice restates and revises RAD's relocation requirements. However, the fair housing, other civil rights, and relocation requirements that apply to RAD conversions are neither limited to those discussed in this Notice, nor to those specifically reviewed by HUD in the front-end review.

MEETING HUD'S PROCESS AND REVIEW REQUIREMENTS NEVER CONSTITUTES COMPLIANCE WITH SUCH LAWS. THE OBLIGATION TO COMPLY WITH APPLICABLE FAIR HOUSING, OTHER CIVIL RIGHTS, AND RELOCATION LAWS REMAINS WITH THE PHA AND PROJECT OWNER.

The fair housing and civil rights requirements that apply to RAD conversions are not limited to those discussed in this Notice. PHAs and Project Owners are responsible at all times for ensuring that their RAD activities (including those activities implemented by their agents, consultants, contractors, or other RAD team members) comply with all applicable fair housing and civil rights requirements. PHAs and Project Owners shall be accountable for all fair housing and civil rights compliance issues with respect to their RAD activities, whether those activities are undertaken directly or through agents, consultants, contractors, or other RAD team members. While HUD provides this non-exhaustive guidance to assist PHAs and Project Owners during transactions, complying with the requirements set forth in this Notice does not necessarily mean that they, or their agents or consultants, are in compliance with fair housing and civil rights requirements.[4]

This Notice is not intended to, and shall not be construed to, reduce or in any way limit the application of fair housing, other civil rights, and relocation laws and regulations to RAD transactions. For example, HUD's reliance on a PHA's certification that a site meets the site and neighborhood standards required by the RAD Notice is not a determination of compliance with the duty to affirmatively further fair housing or other fair housing and civil rights requirements. As another example, HUD's approval of a site for new construction does not, by itself, constitute a determination of the PHA's compliance with all provisions of Title VI and its duty to affirmatively further fair housing found in the Fair Housing Act and other fair housing and civil rights requirements, nor indicate HUD's approval of the PHA's or locality's overall housing strategy. HUD's approval of a RAD conversion after front-end review reflects only that the project may proceed through the RAD conversion process; it does not constitute a determination

[4] The PHA's or Project Owner's agents, consultants, contractors, and other RAD team members may also have fair housing and other civil rights obligations (whether under this Notice or otherwise) and the forgoing does not, in any way, limit the independent obligation of any such parties to ensure their own compliance with applicable fair housing and other civil rights laws.

that the project is in compliance with applicable fair housing, civil rights, and relocation requirements.

HUD's approval of a front-end review submission is based on limited information and is intended to assist the PHA or Project Owner in meeting their fair housing, civil rights, and relocation obligations.[5] The PHA is responsible for ensuring that its RAD conversion is consistent with its certification to affirmatively further fair housing and complies with applicable civil rights laws.[6] The front-end reviews described in this Notice shall not be construed to limit other fair housing and civil rights investigations that HUD may conduct. HUD retains all compliance and enforcement authority.

HUD's determination that the PHA or Project Owner has failed to meet submission, certification, or approval requirements with respect to fair housing, other civil rights, or relocation requirements is grounds for terminating a Commitment to enter into a Housing Assistance Payments Contract (CHAP), denying the issuance of a RAD Conversion Commitment (RCC), or denying authority to convert under RAD.

1.3. Applicability

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.

This Notice supplements the RAD Notice with respect to fair housing and civil rights requirements applicable to public housing properties converting under RAD and with respect to all matters related to the relocation of residents as a result of RAD public housing conversions. To the extent that there is a conflict between this Notice and the RAD Notice, this Notice shall govern. This Notice replaces and supersedes Notice H 2014-09/PIH 2014-17 (issued July 14, 2014).

Upon issuance, the terms of this Notice will apply to all projects that have applied for conversion of assistance under the First Component of RAD but have not yet converted. As this Notice provides guidance, clarification, and explanation regarding fair housing and civil rights requirements that are <u>already</u> applicable to RAD conversions, this Notice shall not affect any front-end civil rights approvals provided by HUD prior to the effective date of this Notice and otherwise shall be effective with respect to front-end civil rights approvals without exception. However, with respect to relocation activities for Converting Projects under the First Component where a PHA has already submitted a Financing Plan pursuant to the RAD Notice at the time of issuance of this Notice, and provided that the Financing Plan has been accepted for full review after initial screening for completeness, the PHA may, within sixty (60) days after issuance of this Notice, request (in writing uploaded to the RAD Resource Desk) to be governed by H 2014-

[5] For example, the front-end review is specific to an individual site. A PHA that does not promote fair housing choice outside areas of minority concentration and continues to site affordable housing in minority concentrated areas may be in noncompliance with the duty to affirmatively further fair housing and other fair housing and civil rights obligations, even if the specific site is approved based on the information provided and pursuant to the front-end review of the PHA's site and neighborhood standards submission.
[6] See 24 C.F.R. § 5.105 and, as applicable, 24 C.F.R. § 983.57(b)(2) or Appendix III of the RAD Notice.

09/PIH 2014-17. For such projects and where otherwise appropriate in cases of hardship as determined by HUD, HUD may apply the terms of H 2014-09/PIH 2014-17 with respect to relocation activities, but not with respect to fair housing and civil rights requirements.

RAD projects which have been awarded Choice Neighborhoods Implementation (CNI) grants are subject to the provisions of the applicable Choice Neighborhoods Notice of Funding Availability (NOFA) and grant agreement regarding site and neighborhood standards and are not subject to the RAD front-end civil rights transaction reviews described in this Notice. For properties being redeveloped with funding under a CNI grant, the relocation requirements set forth in this Notice are superseded by guidance regarding relocation included in the CNI NOFA. Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a Choice Neighborhood project's conversion of assistance.

1.4. Explanation of Major Provisions

This Notice adds to and revises pre-existing guidance related to fair housing, civil rights, and relocation (as contained in the RAD Notice and H 2014-09/PIH 2014-17) with respect to RAD transactions. Among the key provisions and changes are the following:

<u>Fair Housing & Civil Rights</u>

- Reaffirms the applicability of fair housing and civil rights requirements to all RAD-related activities (see, e.g., Section 3.3 and Section 4);
- Reiterates when HUD front-end civil rights review (originally outlined in the RAD Notice) is required in addition to the PHA's analysis and certification of compliance, to assist the PHA and Project Owner to comply with fair housing and civil rights requirements (see Section 5.3);
- Outlines certain conditions under which HUD will conduct a front-end review to determine whether the site is in an area of minority concentration relative to the site's housing market area (see Section 5.4(A));
- Provides guidance, for purposes of the RAD front-end civil rights review, on the concepts of "area of minority concentration" and "housing market area" that are reviewed when determining whether a site is in an area of minority concentration (see Section 5.4(B));
- Elaborates on specific information that HUD will consider, and that PHAs should provide evidence of, in order for a proposed site to meet the existing exceptions to permit new construction in an area of minority concentration, identifies presumptions for meeting the sufficient comparable opportunities exception and describes factors that HUD may consider in evaluating the overriding housing needs exception (see Section 5.4(C) and Section 5.4(D));
- Articulates issues that HUD will consider in completing the front-end civil rights review for transfers of assistance, including, for example, accessibility and minority concentration (see Section 5.5);
- Outlines the information to be submitted for HUD's front-end civil rights review of transactions where unit reductions, unit reconfigurations, or changes in occupancy are proposed (see Section 5.6);
- Identifies the situations where front-end civil rights reviews are required when changes in the accessibility features of a site are made (see Section 5.7(B)); and

- Prohibits the Project Owner of a Converted Project with a PBRA HAP contract from initiating any new leasing or marketing activities (other than leasing and outreach to households holding a right to return to the Covered Project), including the solicitation, distribution or acceptance of applications or development of a waiting list, until HUD has approved the Affirmative Fair Housing Marketing Plan ("AFHMP") (see Section 5.8).

Relocation

- Requires PHAs or Project Owners to prepare a written relocation plan for all transactions that involve permanent relocation or temporary relocation anticipated to exceed 12 months (see Section 6.1);
- Requires PHAs to provide residents with a RAD Information Notice (RIN) in order to ensure that residents are informed of potential project plans and of their rights in connection with RAD prior to submission of the RAD application (see Section 6.6(A));
- Clarifies that the General Information Notice (GIN), when applicable, should be provided as soon as feasible and no later than 30 days following the issuance of the CHAP (see Section 6.6(B));
- Requires Project Owners to provide a notification of Return to the Covered Project, when applicable (see Section 6.6(F));
- Moves the date before which PHAs are prohibited from beginning any physical relocation earlier in the conversion process (specifically, from the date of Closing to the later of the effective date of the RCC and the expiration of the 30- or 90-day RAD Notice of Relocation period, as applicable) (see Section 6.8);
- Clarifies the specific requirements applicable to different types of relocation (e.g., moves within a property, temporary relocation of less than 12 months, etc.) (see, e.g., Section 6.4);
- Provides enhanced guidance on the right to return requirements, any offers of alternative housing options and the documentation that must be retained when tenants choose an alternative housing option and decline their right to return (see, e.g., Section 6.2 and Section 6.10);
- Describes how HUD has administratively implemented URA requirements and URA relocation assistance and payments for displaced persons, when applicable, to residents who choose to decline the right of return and, instead, choose voluntary permanent relocation (see, e.g., Section 6.4(C) through (F) and Section 6.10);
- Requires PHAs to maintain detailed data regarding each household that will be relocated, with key dates of notices and moves (see Section 6.9); and
- Identifies key fair housing and civil rights requirements applicable during relocation (see, e.g., Section 4).

1.5. Request for Public Comment

HUD acknowledges the complexity of the issues addressed in this Notice. This Notice is effective immediately upon issuance, but HUD also seeks comment from the public regarding the clarity and organization of the Notice and regarding areas where the policies and procedures described are unclear or ambiguous. HUD will consider whether changes in response to comments are justified and will implement any appropriate changes in a revision of this Notice. Please submit all comments to RAD@hud.gov within 30 days of the issuance of this Notice.

1.6. Paperwork Reduction Act

In accordance with the Paperwork Reduction Act (PRA), HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number. OMB approved information collection forms will be posted on the RAD website and the Federal Register.

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SECTION 3. Background

3.1. RAD Authority

RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Pub. L. No. 112-55, enacted November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Public Law 113-76, enacted January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Public Law 113-235, enacted December 6, 2014), and the Division L, Title II, Section 237 of the Consolidated Appropriations Act (Public Law 114-113, enacted December 18, 2016), collectively and as it may be further amended from time to time, the "RAD Statute." RAD allows certain eligible properties to convert assistance to long-term project-based Section 8 contracts and has two separate components. The First Component allows projects funded under the public housing program to convert their assistance to long-term, project-based Section 8 rental assistance contracts. Under this component of RAD, public housing agencies (PHAs) may choose between two different Section 8 housing assistance programs: project based vouchers (PBVs) or project-based rental assistance (PBRA). The "Second Component" of RAD allows owners of projects funded under the Rent Supplement (Rent Supp), Rental Assistance Payment (RAP), and Moderate Rehabilitation programs to convert certain units to PBV or PBRA Section 8 units following certain contract expirations or terminations. The RAD Statute is implemented by the RAD Notice.

3.2. Definitions

All capitalized terms defined in the RAD Notice, as amended, shall have the definitions ascribed to them therein unless otherwise specifically noted in this Notice.[7] Pre-conversion projects whose assistance is converting from public housing to Section 8 under RAD are referred to in the RAD Notice and in this Notice as "Converting Projects." Post-conversion projects are referred to in the RAD Notice and this Notice as "Covered Projects."

3.3. Applicable Legal Authorities

Appendix I to this Notice identifies key legal authorities with respect to fair housing, civil rights, and resident relocation. Part 2 of Appendix I provides greater detail regarding federal accessibility requirements set forth in three of the legal authorities described in Appendix I,

[7] Many of the fair housing and civil rights concepts used throughout this Notice are terms of art that are defined in applicable statutes and regulations identified in Appendix I of this Notice, while others have been developed through judicial interpretation. PHAs and Project Owners should familiarize themselves with these terms of art and should consult 42 U.S.C. § 3602 (Fair Housing Act); 24 C.F.R. §§ 5.152-100.20 (Fair Housing Act); 42 U.S.C. §§ 2000d-2000d-4a (Title VI of the Civil Rights Act of 1964); 24 C.F.R. § 1.2 (Title VI); 29 U.S.C. § 705 (Rehabilitation Act); 24 C.F.R. § 8.3 (Section 504); 42 U.S.C. §§ 12102, 12132, 12181 (Americans with Disabilities Act (ADA)); 28 C.F.R. § 35.104 (Title II of the ADA); and 28 C.F.R. § 36.104 (Title III of the ADA). In addition, many of the relocation concepts are terms of art that are defined in 42 U.S.C. § 4601 *et seq*. (Uniform Relocation Act (URA)), Section 104(d) of the Housing and Community Development Act of 1974 codified at 42 U.S.C. § 5304(d), and their implementing regulations at 49 C.F.R Part 24 and 24 C.F.R. Part 42 subpart C.

Part 1. PHAs and Project Owners must be familiar with these legal authorities and must evaluate, based on the facts of their situation, which legal authorities are applicable in which situations. **Failure to comply with any legal authority as applicable to the PHA's or Project Owner's actions or inactions may result in liability under such authority.** Appendix I does not attempt to provide a complete and exhaustive explanation of the legal authorities, nor to fully inventory the situations in which each legal authority is applicable. Instead, Appendix I is an overview intended to serve as a general introduction or reminder for PHAs and Project Owners of these fair housing, other civil rights, and relocation authorities and to facilitate their identification of appropriate topics for further research or expert counsel. The recitation of these legal authorities neither expands nor diminishes their applicability to the PHA's and Project Owner's activities in connection with their RAD conversion.

The RAD Statute authorizes the Secretary of HUD to waive or specify alternative requirements for certain provisions of law, except for requirements related to, among others, fair housing and nondiscrimination.[8] In addition to the general application of various federal statutes and their implementing regulations as discussed in Appendix I, below, HUD regulations at 24 C.F.R. § 5.105 apply such authorities to all HUD programs, including RAD.

3.4. Further Information

Because each RAD proposal varies in its scope, this Notice may not address each PHA's or Project Owner's specific circumstances. PHAs and Project Owners should carefully review the laws, regulations, notices, and guidance material referenced in this Notice. Any questions related to the administration of the RAD program should be referred to the appropriate RAD Transaction Manager (TM) or may be emailed to rad@hud.gov.

SECTION 4. Generally Applicable Fair Housing and Civil Rights Requirements Relevant Throughout the RAD Conversion Process

This Section provides a summary overview of key principles regarding program implementation and an overview of generally applicable fair housing and civil rights requirements. Appendix I identifies the key legal authorities from which these principles are derived. These key principals, together and with the legal authorities identified in Appendix I, frame the PHA's efforts to implement a RAD conversion. In some cases, these requirements are particularly relevant to the process of planning the RAD conversion, while in others they have particular relevance for the structure of the RAD transaction itself, and in yet other cases, both. Elements of RAD transactions that have civil rights implications include, but are not limited to, transfers of assistance, temporary and permanent relocation, demolition, site selection, new construction, occupancy policies, changes in unit configuration, increases or reductions in units, waiting list administration policies, policies regarding return of temporarily relocated tenants, substantial rehabilitation or alteration, program accessibility, tenant selection policies and priority transfers, providing information to and communicating with persons with Limited English Proficiency (LEP) and persons with disabilities, reasonable accommodation policies, and Affirmative Fair

[8] *See* Pub. L. No. 112-55, as amended.

Housing Marketing Plans (AFHMPs). All PHAs must consider civil rights when structuring these and other elements of their RAD transaction.

RAD transactions are governed by the same civil rights authorities that govern HUD-assisted activities generally.[9] Converting Projects are subject to civil rights and equal opportunity requirements under the public housing regulations, and Covered Projects are subject to civil rights and equal opportunity requirements under the PBV regulations or the PBRA regulations, as applicable.[10] As described further below, the Fair Housing Act prohibits discrimination in housing[11] and requires all federal executive departments and agencies to "administer their programs and activities relating to housing and urban development … in a manner affirmatively to further" fair housing.[12] In addition, all programs or activities receiving Federal financial assistance are subject to Title VI of the Civil Rights Act of 1964 forbidding discrimination on the basis of race, color, and national origin[13] and Section 504 of the Rehabilitation Act of 1973, which forbids discrimination on the basis of disability and requires that programs or activities receiving Federal financial assistance make such programs or activities "when viewed in its entirety" readily accessible to persons with disabilities and make reasonable accommodation to the needs of persons with disabilities.[14] RAD transactions are also subject, as applicable, to the requirements of Titles II and III of the Americans with Disabilities Act, Executive Order 11063, and HUD regulations at 24 C.F.R. part 107. Thus, as with the administration of all HUD programs and all HUD-assisted activities, fair housing and civil rights issues must be considered in the administration of the RAD program. PHAs must not implement actions and policies that may have a discriminatory effect on the basis of race, color, sex, national origin, religion, disability, or familial status or that may impede, obstruct, prevent, or undermine efforts to affirmatively further fair housing.[15] Note, in particular, the following requirements:

- **Affirmatively Furthering Fair Housing (AFFH):** The Fair Housing Act requires that HUD administer its programs and activities in a manner that affirmatively furthers the purposes of the Fair Housing Act. The Fair Housing Act not only prohibits discrimination but, in conjunction with other statutes, directs HUD's recipients, including PHAs, to take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination. Through various statutes, regulations, and executive orders, PHAs must take various actions in accordance and in conjunction with their Fair Housing Act obligation to affirmatively further fair housing. For example, under regulations implementing the United States Housing Act of 1937 (the Act), HUD recipients must, among other requirements, certify that they will affirmatively further fair housing. In addition, under HUD's Affirmatively Furthering Fair Housing (AFFH) rule promulgated July 16, 2015, PHAs must periodically conduct an Assessment

[9] *See* 24 C.F.R. § 5.105.
[10] *See, e.g.,* 24 C.F.R. §§ 880.601, 881.601 and 983.8 for civil rights related regulations applicable to PBV and PBRA transactions.
[11] *See* 42 U.S.C. §§ 3601 *et seq*., and HUD regulations in 24 C.F.R. part 100
[12] 42 U.S.C. § 3608(d) and (e).
[13] *See* 42 U.S.C. §§ 2000d *et. seq*., and HUD regulations in 24 C.F.R. part 1.
[14] *See* 29 U.S.C. §§ 701 *et seq*., and HUD regulations in 24 C.F.R. part 8.
[15] *See* 24 C.F.R. part 1 and part 100 subpart G.

of Fair Housing (AFH) as set out by the rule, either individually or in collaboration with other program participants.[16] Under the AFFH rule, in order to develop a successful affirmatively furthering fair housing strategy, the PHA must assess the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs. PHAs must ensure that their activities in connection with a RAD conversion are consistent with their AFH, including any applicable joint or regional AFH in which they are a joint participant, and with any applicable Analysis of Impediments to Fair Housing Choice (AI), Fair Housing Equity Assessment, PHA 5-Year Plan, PHA Annual Plan, Moving to Work (MTW) Plan, or related planning documents and other regulatory and programmatic requirements implementing the obligation to affirmatively further fair housing to which they are a party.[17]

- **Nondiscriminatory Site Selection:** HUD's site and neighborhood standards require that the proposed site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provision of Title VI of the Civil Rights Act, the Fair Housing Act, Executive Order 11063, and Department regulations implementing these authorities. The site must meet the Section 504 site selection requirements in 24 C.F.R. § 8.4(b)(5). Additional provisions appear in 24 C.F.R. § 983.57(b) of the PBV rules and, for PBRA, in Appendix III of the RAD Notice. HUD's Title VI regulation specifically prohibits site selection that has the "purpose or effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination" on the basis of race, color, or national origin.[18] The Title VI regulations also impose an obligation on the part of an applicant or recipient of HUD financial assistance to take actions to overcome the effect of prior discrimination or conditions that limit participation by persons of a particular race, color, or national origin.[19] In addition, HUD's Section 504 regulation prohibits recipients from selecting sites the purpose or effect of which would (1) exclude qualified individuals with disabilities from or deny them the benefit of a program or activity, or otherwise subject them to discrimination; or (2) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities.[20] ADA regulations likewise prohibit site selections that have the purpose or effect of excluding individuals with disabilities (including members of the public with disabilities), denying them benefits, or subjecting them to discrimination.[21] Finally, the Fair Housing Act prohibits discriminatory site selection, including perpetuation of segregation in transfers of assistance and new construction.

- **Meaningful Access for Persons with Limited English Proficiency (LEP):** The PHA or Project Owner is required to take reasonable steps to ensure (a) they provide meaningful access to programs and activities for persons who have a limited ability to read, speak, or understand English; (b) any person with LEP who will be temporarily relocated or

[16] 24 C.F.R. § 5.150 *et seq.*
[17] *See* 24 C.F.R. § 5.150 *et seq*. and 24 C.F.R. §§ 91.225, 91.325, or 91.425.
[18] *See* 24 C.F.R. § 1.4(b)(3).
[19] *See* 24 C.F.R. § 1.4(b)(6).
[20] *See* 24 C.F.R. § 8.4(b)(5).
[21] *See* 28 C.F.R. § 35.130(b)(4); 28 C.F.R. § 36.301.

permanently displaced has meaningful access to any public meetings regarding the project; and (c) they provide meaningful access to LEP persons to any information provided to residents including, but not limited to, any relocation notices. Generally, the PHA or Project Owner will be responsible for providing oral interpreters at meetings, including ensuring their competence, and covering any associated translation and interpretation costs.[22]

- **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 C.F.R. § 8.6) and with 49 C.F.R. § 24.5, and as applicable, the Americans with Disabilities Act. This includes ensuring that, unless such actions would result in undue financial and administrative burdens or fundamental alterations, notices and resident meetings are provided in appropriate alternative formats as needed, e.g., Braille, audio, large type, accessible electronic communications, assistive listening devices, and sign language interpreters. Even in cases where the proposed actions may result in undue financial and administrative burdens or fundamental alterations, certain actions must still be taken. Specifically, appropriate auxiliary aids and services that would not result in such undue burdens or fundamental alterations must still be provided to ensure effective communication.

- **Accessible Meeting Facilities for Persons with Disabilities:** Pursuant to regulations implementing Section 504 of the Rehabilitation Act of 1973 and 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 on the PHA and/or Project Owner, in which case the PHA or Project Owner must take any action that would not result in such undue 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 site or in-home briefing.[23] 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 persons without disabilities to the fullest extent possible.[24]

[22] For more information about LEP obligations, see HUD's Limited English Proficiency (LEP) Frequently Asked Questions guidance at http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq#q26.

[23] In selecting locations for consultation with residents, the PHA and/or Project Owner shall be guided by the goal of maximizing participation in an integrated setting so that residents with disabilities and residents without disabilities may hear and consider each other's views. Priority shall be given to using on-site accessible locations (including, e.g., TV rooms or informal gathering places), even if doing so may require multiple sessions with smaller groups of residents. In addition, Title III of the Americans with Disabilities Act requires private entities that operate places of public accommodation, including social service establishments, leasing offices of private housing developments, and certain private housing providers, to comply with certain physical accessibility requirements which are similar to the requirements under Section 504 and Title II.

[24] *See* 28 C.F.R. part 35, Appendix B.

- **Accessibility for Persons with Disabilities Throughout the Planning and Implementation Process:** A number of accessibility requirements, including but not limited to site selection, apply to all RAD conversions, as they do to the PHA's activities regardless of the PHA's participation in RAD.[25] PHAs and Project Owners should also be aware that state or local laws, regulations, and codes may contain greater accessibility requirements. This Notice provides, in Appendix I, Part 2, an overview of accessibility requirements under existing law. The information in Appendix I, Part 2 is intended to assist with the PHA's or Project Owner's compliance with accessibility requirements. PHAs and Project Owners must review Appendix I, Part 2 early-on in planning for the RAD transaction. PHAs and Project Owners may determine that it is most efficient to address accessibility matters early in the project planning. In addition, PHAs and Project Owners must evaluate, throughout the transaction and based on the facts of their situation, which requirements are applicable in which situations to ensure they appropriately address accessibility requirements. PHAs and Project Owners are responsible for ensuring that the architectural drawings and construction comply with the PHA's and Project Owner's obligations and all Federal civil rights requirements, including accessibility requirements under the Fair Housing Act, Section 504, and the ADA.

  Accessibility requirements also apply during all stages of a RAD transaction, including during relocation. Existing information (e.g., resident 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) and the residents themselves should be consulted throughout the process of developing and implementing a RAD conversion. Related activities include, but are not limited to:

  - Identifying and maintaining existing and pending reasonable accommodations, including the need for larger units to accommodate live-in aides or special equipment;
  - Determining what direct services may be needed as a reasonable accommodation (e.g., packing, moving, identification of temporary housing);
  - Identifying accessible unit features and assuring that temporary or permanent replacement housing contains comparable features;
  - Budgeting appropriately to ensure that reasonable accommodations are addressed.

  For more information about compliance with accessibility requirements, the PHA or Project Owner should refer to appropriate notices concerning civil rights requirements and may contact HUD's Office of Fair Housing and Equal Opportunity in either the Washington, D.C. or applicable field offices for more specific guidance. For additional, non-exhaustive guidance on providing relocation assistance to persons with disabilities, see Exhibit 3-1 in HUD Handbook 1378.

[25] For more detailed information on these laws and their requirements, see PIH Notice 2010-26, issued July 26, 2010 (available at http://www.hud.gov/offices/pih/publications/notices/10/pih2010-26.pdf). While this notice has an expiration date in 2011, because the notice summarizes and discusses regulatory requirements, the information in the notice provides helpful guidance.

- **Reasonable Accommodations in Rules, Policies, Practices and Services**: Under the Fair Housing Act, the PHA or Project Owner must make reasonable accommodations in rules, policies, practices, and services when such accommodations may be necessary to afford a person with a disability an equal opportunity to use and enjoy a dwelling.[26] Under Section 504, the PHA or Project Owner must also make reasonable accommodations to residents with disabilities, which may include providing and paying for structural modifications to dwelling units and public or common use areas. Titles II and III of the ADA provide similar requirements. Common examples of reasonable accommodations that may occur during relocation are permitting an individual with a disability to relocate near public transportation, providing a unit larger than otherwise permitted for a live-in aide, and making exceptions to no-animal rules for assistance and service animals. Accommodations generally need not be made where providing such an accommodation would be an undue financial and administrative burden or a fundamental alteration of the nature of the service. However, reasonable accommodations must be made to the extent the accommodation does not impose an undue financial and administrative burden or a fundamental alteration of the nature of the service. Reasonable accommodations must follow the individual with the disability throughout the RAD process, including during relocation. Furthermore, PHAs and Project Owners may be required to provide particular reasonable accommodations during relocation, such as assistance moving household items.[27]

- **Physical Changes to Dwelling Units, Public and Common Use Areas and Other Facilities for Accessibility**: Under the Fair Housing Act, the PHA or Project Owner may be required to permit reasonable modifications. A reasonable modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. Reasonable modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. A request for a reasonable modification may be made at any time during the tenancy. When relocating an individual with a disability who has such modifications in their dwelling unit or public and common use areas because of the individual's disability, regardless of who made them, the PHA or Project Owner has an obligation to provide and pay for such modification in the new dwelling. When considering requests by individuals with disabilities for structural changes to units or public and common use areas, PHAs and Project Owners should take particular note that they may be required to make and pay for such structural modifications as reasonable

[26] For additional information regarding reasonable accommodations under the Fair Housing Act, *see* the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Reasonable Accommodations Under the Fair Housing Act (May 17, 2004), at http://www.hud.gov/offices/fheo/library/huddojstatement.pdf.

[27] *See* 49 C.F.R. part 24, Appendix A, § 24.2(a)(8)(vii), which states that under the URA, "Reasonable accommodation of a displaced person with a disability at the replacement dwelling means the Agency is required to address persons with a physical impairment that substantially limits one or more of the major life activities. In these situations, reasonable accommodation should include the following at a minimum: Doors of adequate width; ramps or other assistance devices to traverse stairs and access bathtubs, shower stalls, toilets and sinks; storage cabinets, vanities, sink and mirrors at appropriate heights. Kitchen accommodations will include sinks and storage cabinets built at appropriate heights for access. The Agency shall also consider other items that may be necessary, such as physical modification to a unit, based on the displaced person's needs."

accommodations under Section 504 and because of similar requirements under the ADA even though the Fair Housing Act may only require the owner to allow such changes to be made and paid for by the individual with a disability. Before determining that they are not required to make or pay for structural changes, PHAs and Project Owners are encouraged to consider carefully their obligations under each applicable statute.

SECTION 5. Application of Key Fair Housing and Civil Rights Requirements to RAD Transactions

The generally applicable fair housing and other civil rights requirements described above, and in Appendix I, apply throughout the planning and implementation of a RAD transaction and the PHA is responsible for ensuring compliance with these requirements. As key requirements may be misunderstood, the RAD program has established specific additional procedures to assist RAD participants to ensure they comply with the applicable requirements. Specifically, the RAD Notice established a civil rights eligibility review and criteria for front-end civil rights reviews.

This Section elaborates on these requirements from the RAD Notice. The front-end review procedures described below establish procedures and criteria for the supplemental front-end review and technical assistance, criteria which are specific to the RAD program. Criteria for this supplemental front-end review are informed by, but not the same as, fair housing or civil rights rules and policies generally.

This Section is organized to loosely follow the stages of a RAD conversion transaction, beginning with RAD eligibility and continuing through site selection, transfer of assistance, unit design requirements and marketing. In addition, this Section describes the timing and procedures for submitting data and documents to HUD so that HUD may complete its front-end review. The submission procedures are also designed to serve as a tool for PHAs to identify issues of potential concern at appropriate stages of the RAD conversion and as a tool for HUD to identify potential needs for technical assistance.

5.1. RAD Eligibility Review

To be eligible for RAD, the PHA must meet all eligibility requirements set forth in Section 1.3 of the RAD Notice, including the civil rights threshold requirements found at Section 1.3.G of the RAD Notice. A PHA must not have a charge, cause determination, lawsuit, or letter of findings, referenced in Section 1.3.G of the RAD Notice, against the PHA itself, its transferees, proposed development partners, or sub-recipients that has not been resolved, or is not in the process of being resolved, to HUD's satisfaction. This determination shall be made prior to issuance of the CHAP.

The CHAP may be revoked by HUD if HUD determines that the terms of the conversion would be inconsistent with fair housing and civil rights laws or a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement. HUD may terminate a CHAP or RCC if it determines that the terms of the conversion would be inconsistent with fair housing or civil rights laws or is inconsistent with, would hinder, or would delay satisfaction of a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement.

HUD may terminate an approval to proceed with a RAD conversion if it determines that the terms of the conversion would be inconsistent with fair housing or civil rights laws or a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement.

5.2. PHA's Proposed Site Selection and Certification

For all RAD conversions, the PHA must comply with all applicable site selection requirements as set forth in this Notice and the RAD Notice and in accordance with any additional applicable published guidance provided by HUD. As set forth in the RAD Notice, conversions of assistance to PBV involving new construction, whether on a new site or on a current site, are subject to the site selection standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (e), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2). All other conversions to PBV, including transfers of assistance to an existing property other than the Converting Project, are subject to the standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (d), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2).[28] Site selection requirements set forth at Appendix III of the RAD Notice apply to RAD conversions to PBRA assistance, as does the requirement not to place housing in neighborhoods with highly concentrated poverty based on the criteria formulated for transfers under Section 8(bb) of the United States Housing Act of 1937.[29] PBV and PBRA site selection must also be consistent with the requirements of the Fair Housing Act, Title VI, Section 504, the ADA and their implementing regulations.

It is the PHA's responsibility to ensure that the site selection complies with all applicable site selection requirements, including the requirements of this Notice and the RAD Notice. Pursuant to the RAD Notice, the PHA must certify with the submission of its Annual Plan, Significant Amendment to its Annual Plan, or MTW Plan that it complies with the applicable site selection requirements and must maintain records of its analysis and the data relied upon in making its determination of compliance. The PHA must also determine and subsequently state in the certification that the site is "suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto."[30] Although this Notice provides detail regarding certain civil rights-related site and neighborhood standards, PHAs must certify compliance with <u>all</u> applicable site and neighborhood standards.[31]

The PHA must also certify that, in conducting its review of site selection for the proposed project, the PHA completed a review with respect to accessibility for persons with disabilities and that the proposed site is consistent with applicable accessibility standards under the Fair Housing Act, Section 504, and the ADA. The site and neighborhood standards for PBV and PBRA require the site to be "suitable from the standpoint of facilitating and furthering full compliance with" the Fair Housing Act and require the site to meet the Section 504 site selection

[28] *See* the provisions of Section 1.6.A.4 of the RAD Notice.
[29] 42 U.S.C. § 1437f(bb).
[30] For RAD conversions to PBRA, the RAD Notice uses the term "the site and neighborhood is suitable," rather than "the site is suitable." *See* Appendix III of the RAD Notice, paragraph (a).
[31] *See* 24 C.F.R. § 983.57 and the RAD Notice at Section 1.4(A)(7)

requirements described in 24 C.F.R. § 8.4(b)(5).[32] The Fair Housing Act, as implemented at 24 C.F.R. § 100.205, requires "covered multifamily dwellings" built for first occupancy after March 13, 1991, to contain accessible design features. HUD's Section 504 regulations at 24 C.F.R. § 8.4(b)(5) require that, in determining the site or location of a federally assisted facility, an applicant for assistance or recipient may not make selections the purpose or effect of which would: (i) exclude qualified individuals with disabilities from, deny them the benefits of, or otherwise subject them to discrimination under, any program or activity that receives Federal financial assistance from HUD, or (ii) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities. Title II of the ADA contains a similar requirement that a public entity, such as the PHA, may not, in determining the site or location of a facility, make selections (i) that have the effect of excluding individuals with disabilities from, denying them the benefits of, or otherwise subjecting them to discrimination; or (ii) that have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the service, program, or activity with respect to individuals with disabilities.[33] Factors relevant to a site review under these standards may include, among others:

- Site features, such as inaccessible slopes in routes, lack of accessible sidewalks, curb ramps, accessible parking spaces, and placement of dumpsters or other physical features that would impede access to and movement within the site;
- Building features, such as inaccessible building entrances, other methods of ingress and egress, public and common use areas (e.g., the rental office, parking areas, mail areas, trash areas, community rooms, shared use toilet rooms, laundry facilities and walkways inside and outside that connect these public and common use areas to units), and barriers to access by members of the public; and
- Lack of accessible transit or para-transit and accessible public sidewalks and accessible transportation stops.

When such conditions are present at the site and would exclude individuals with disabilities from, deny them the benefits of, or otherwise subject them to discrimination, or would defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to individuals with disabilities, the site must not be selected unless the proposal includes remediation of the barriers to achieve compliance with accessibility requirements (including identification and remediation of any nonconforming design and construction conditions in "covered multifamily dwellings" under the Fair Housing Act). Remediation of the barriers may include, for example, physical accessibility improvements to the site, arrangements for access to accessible supportive services, or reasonable accommodations for current or prospective residents with disabilities, including members of the public. The Financing Plan submitted to HUD must describe and document resources sufficient to pay for the remediation of accessibility barriers.[34]

[32] *See* 24 C.F.R. § 983.57(b)(2) (PBV conversions); *see also*, Appendix III (a) of the RAD Notice (PBRA conversions).
[33] *See* 28 C.F.R. § 35.130(b)(4).
[34] In conducting its review prior to certification, and in preparing for the certification, PHAs and Project Owners may find it useful to consult with their local or regional FHEO office, the United States Access Board, local or state

While all PHAs must certify their compliance with applicable site selection requirements as described in this Section, some RAD transactions will also be subject to a front-end review of the site selection. For transactions involving activities that present site selection issues of greater complexity, as described in Sections 5.3 through 5.5 below, front-end review will allow HUD's Office of Fair Housing and Equal Opportunity (FHEO) to assist the PHA to consider relevant laws and regulations while completing its site selection review and certification.

5.3. RAD Front-End Civil Rights Transaction Review

Fair Housing Act and other civil rights issues may arise throughout a RAD transaction. Under the Fair Housing Act, an assessment of site suitability includes an analysis of the impact that the siting of the project would have on patterns of segregation for protected classes. The Fair Housing Act is of particular importance when a RAD proposal concerns site selection for new construction or reconfiguration of housing on the original public housing site – for example, the unit size distribution (e.g., conversion of larger bedroom size units to one-bedroom units, which may have an adverse impact on housing opportunities for families with children) or a reduction in the number or distribution of accessible units (which may have an adverse impact on housing opportunities for persons with disabilities). RAD conversions involving new construction must also comply with the Fair Housing Act's accessibility requirements.

Compliance with all applicable fair housing and civil rights requirements is the responsibility of both the PHA and the Project Owner. However, to assist with compliance, HUD's Office of Fair Housing and Equal Opportunity (FHEO) will conduct a front-end civil rights review of project proposals containing activities identified as particularly at risk of violating applicable fair housing and civil rights laws. The activities that must be submitted for front-end civil rights review are listed in Section 5.3(A), below.

A) Activities Subject to Front-End Civil Rights Review

All RAD conversions that include one or more of the activities listed below (Sections 5.3(A)(1) through 5.3(A)(9)) are subject to a front-end review for compliance with certain civil rights and fair housing requirements. The specific items that HUD will review in the front-end review will depend on which activities are involved in the specific transaction. A RAD conversion may not include one of the activities below without prior written approval from HUD. All Financing Plans must include evidence that the PHA has secured written approval from HUD for any of the following activities that are included in its RAD conversion:

(1) Conversions of assistance involving new construction, whether on a new site or on a current site, in an area of minority concentration. Front-end review of this activity shall be pursuant to Section 5.4(B), below and, in addition, the PHA shall

architectural access board or other accessibility authority for information on accessibility standards. Other sources of information on accessibility requirements may include protection and advocacy organizations or independent living centers. In addition, the non-HUD resources may provide advice on how to assess accessibility needs and formulate physical accessibility strategies.

certify in its Annual Plan compliance with site and neighborhood standards applicable to new construction as described in Section 5.2.

(2) Transfers of assistance where all or a portion of the Converting Project's assistance is transferred to a new site(s) (either new construction or to an existing project) as part of the subject transaction. Front-end review of this activity shall be pursuant to Section 5.5(B), below and, in addition, the PHA shall certify in its Annual Plan compliance with site and neighborhood standards applicable to existing housing as described in Section 5.2.

(3) Conversions of assistance where the total number of units in the Covered Project is less than the original number of units in the Converting Project (this includes de minimis reductions). Front-end review of this activity shall be pursuant to Section 5.6.

(4) Conversions of assistance where the Covered Project's unit configuration is different from the unit configuration of the Converting Project. Front-end review of this activity shall be pursuant to Section 5.6.

(5) Conversions involving a change in occupancy, where the Covered Project serves a different population from the one served by the Converting Project (e.g., when a Converting Project serves families but the Covered Project is subject to an elderly preference or introduction of restrictions or preferences based on age or disability that will change the occupancy of the property). Front-end review of this activity shall be pursuant to Section 5.6.

(6) Conversions of assistance in which the construction schedule indicates that relocation is likely to exceed 12 months. Front-end review of this activity shall be pursuant to Section 5.7(A).

(7) Conversions of assistance involving new construction or substantial alteration,[35] as those terms are defined in Section 504 of the Rehabilitation Act of 1973. Front-end review of this activity shall be pursuant to Section 5.7(B).

(8) Conversions of assistance involving a Converting Project subject to a Voluntary Compliance Agreement or Conciliation Agreement with HUD or a Consent Decree or Settlement Agreement with the U.S. Department of Justice or HUD, or where the PHA is subject to such an agreement affecting its entire housing portfolio or otherwise related to the Converting Project. Front-end review of this activity shall be pursuant to Section 5.7(C).

[35] Section 504 defines substantial alteration of a housing project as alterations where a housing project has 15 or more units, and the rehabilitation costs will be 75% or more of the replacement cost of the completed facility. *See* 24 C.F.R. § 8.23 (a).

(9) Conversions of assistance where HUD has identified potential fair housing and civil rights concerns or a history of such concerns. Front-end review of this activity shall be pursuant to Section 5.7(C).

PHAs should note that a proposed RAD conversion may trigger front-end review regarding more than one of the activities listed in subsections (1) through (9) of this Section. For example, depending on the details of the proposal, a new construction on-site project could require review under subsections (1), (3), (4), (5), (6), and (7), or could require review under only subsections (1) and (7).

As part of HUD's review of these elements of the RAD conversion plans, HUD may require that PHAs that are carrying out portfolio or multi-phased conversions provide information on their conversion plans for other projects or subsequent phases to ensure that the overall plans for RAD conversion are consistent with civil rights and fair housing.

B) Fair Housing, Civil Rights, and Relocation Checklist

In connection with HUD's front-end fair housing and civil rights and relocation reviews described in this Section 5 and in Section 6, HUD is requiring submission of a Fair Housing, Civil Rights, and Relocation Checklist (the "Checklist"). The Checklist will facilitate the PHAs' and Project Owners' submission of necessary information to complete these reviews.[36] HUD anticipates that a revised Checklist, when available following Paperwork Reduction Act approval, will be separated into parts which can be submitted incrementally as the PHA and Project Owner develop the RAD transaction plans, with different elements of the Checklist applicable at different stages of the transaction planning process. For example, submissions regarding site selection for a RAD transaction involving new construction may occur well before submissions regarding a proposal to change the unit configuration.

The Checklist will outline the minimum information or documentation which HUD will need in order to review each part of the Checklist. After HUD's initial review of any portion of the Checklist, HUD may determine that the data provided in the Checklist is insufficient for HUD to complete its review, in which case HUD may require the PHA or Project Owner to provide supplemental information. The PHA should submit each part as early as possible once the information covered in the applicable part is known. All information specified in the applicable

[36] The Checklist is available at www.hud.gov/rad. As of the publication of this Notice, references to the Checklist refer to the existing FHEO Accessibility and Relocation Plan Checklist under OMB Approval 2577-0276. The PHA shall use the existing Checklist to provide information related to demonstrating compliance with fair housing, other civil rights, and relocation requirements (including accessibility requirements) and, as necessary, may require additional materials for HUD to complete its review, which the PHA may provide in such form as the PHA determines appropriate. Also at www.hud.gov/rad, HUD has provided a listing of information that, depending on the circumstances, HUD may require to complete different components of its front-end review. The Checklist is being revised to fully capture the submission requirements described in this Notice. The revised Checklist will be subject to Paperwork Reduction Act approval and will be posted at the website listed above when available for use.

part of the Checklist must be submitted to HUD for HUD to begin its civil rights review – partial submissions of any applicable part of the Checklist will not be accepted.[37]

C) Timing of Front-End Review Submissions

PHAs and Project Owners are encouraged to submit applicable portions of the Checklist and information associated with a particular activity subject to front-end review as early as possible in the development of their plans. The PHA must ensure that HUD has approved all applicable parts of the Checklist prior to submission of the Financing Plan. Upon request from the PHA, HUD may, at HUD's sole discretion, permit submission of the Financing Plan prior to receipt of approval of the applicable parts of the Checklist and conditioned upon subsequent receipt of such approvals, in which event the PHA and Project Owner may proceed at their own risk.

Early approval of the site of the Covered Project is critical for RAD transaction proposals subject to front-end civil rights review involving site selection standards, specifically new construction in areas of minority concentration (see Section 5.3(A)(1)) and transfers of assistance (see Section 5.3(A)(2)). The PHA must conduct its own assessment of the site during the early stages of planning its RAD transaction. The guidance in this Notice and the Checklist are tools intended to assist the PHA in conducting its own assessment of the site.

The PHA must provide HUD with the Checklist and backup information sufficient for HUD to review the site with respect to the applicable standards. The site selection information should be provided to HUD no later than ninety (90) days following the issuance of the CHAP or, if the CHAP has already been issued as of the publication of this Notice, within ninety (90) days following publication of this Notice. In the event of a change in plans for the Converting Project that would require a front-end review of the site selection standards, the PHA must provide the Checklist and backup documentation within sixty (60) days of the change in plans. PHAs are strongly encouraged to provide front-end review submissions and secure HUD approval prior to applying for LIHTCs or taking action the reversal of which (in the event of non-approval of the site) would be detrimental to the PHA or the Project Owner. PHAs are also encouraged to contact FHEO for technical assistance prior to submission of these materials.

All PHAs shall submit a certification consistent with the requirements of Section 5.2, above. This certification may be prepared specifically in connection with the Checklist or as part of the PHA Annual Plan or Significant Amendment. However, HUD will not consider a submission complete for front-end civil rights review without this certification. All RAD conversions must submit the PHA certification described in Section 5.2 no later than at the time of submission of the Financing Plan.

D) Completion of HUD's Front-End Review

HUD will not approve a RAD conversion if HUD determines that the conversion would operate to discriminate in violation of applicable fair housing and civil rights laws. HUD will not approve proposals that have the purpose, intent, or effect of discriminating on the basis of

[37] The Checklist refers to the existing FHEO Accessibility and Relocation Checklist until a revised Checklist is approved for use pursuant to the Paperwork Reduction Act.

protected class (*i.e.*, race, color, national origin, religion, sex, disability, and familial status). If HUD does not approve a proposed activity based on a front-end review, then it will provide a written description of concerns or deficiencies. The PHA may resubmit the front-end review materials with a changed proposal and/or with additional information addressing HUD's concerns and any deficiencies in the proposal or the submission.

In some circumstances, a special condition to the transaction's RCC will be necessary to ensure that a RAD transaction conforms to fair housing and civil rights requirements. Special conditions to the RCC reflect the conditions necessary in order to complete the RAD conversion. For example, if there is an outstanding remedial agreement or order requiring particular development activities or operating policies to correct a violation of a fair housing or other civil rights requirement, the RCC generally will condition participation in RAD upon agreement by the PHA or the Project Owner, as applicable, to comply with the provisions of such agreements or orders after conversion.

5.4. Front-End Civil Rights Review for RAD Transactions Involving New Construction

A) Conditions Triggering Review

If the proposed project is located in an area of minority concentration, the new site may be approved only if it falls under a permitted exception and meets the other site selection requirements described in Section 5.2. Under the PBV and PBRA site and neighborhood standards, HUD may approve new construction in an area of minority concentration, consistent with the regulatory requirements cited above, only if:

a. Sufficient, comparable housing opportunities for minority families in the income range to be served by the proposed project exist outside areas of minority concentration; or
b. The project is necessary to meet overriding housing needs that cannot be met in that housing market area.[38]

As described in the RAD Notice and in Section 5.3(A) of this Notice, above, HUD will conduct a front-end civil rights review of the PHA's proposed site in certain circumstances. This Notice specifies that for conversions of assistance involving new construction where there are indications that the site may be located in an area of minority concentration per the criteria in subsections (i), (ii), or (iii), below (whether the construction is located on the existing public housing site or on a new site), HUD will conduct a front-end civil rights review of the site to determine whether the site is in an area of minority concentration and, if so, whether it meets one of the exceptions that would allow for new construction in an area of minority concentration.

The PHA shall submit for HUD front-end review the PHA's findings, together with backup documentation, regarding site selection when the site meets any of the following criteria:

i. The PHA self-identifies the area of the site as an area of minority concentration,

[38] 24 C.F.R. § 983.57(e)(3) and Appendix III of the RAD Notice, paragraph (e).

ii. The census tract of the site meets the extent of minority concentration described in Section 5.4(B)(1), below, or
iii. An area comprised of the census tract of the site together with all adjacent census tracts, analyzed as a whole, meets the extent of minority concentration described in Section 5.4(B)(1), below.

If any of these three criteria is applicable, HUD will conduct a review to determine whether the site is in an area of minority concentration and, if applicable, whether the proposed site fits one of the exceptions permitting new construction in an area of minority concentration described in this Section 5.4. A proposed RAD transaction which does not meet one of these triggers must still be evaluated by the PHA and the PHA must certify compliance with the site selection requirements as described in Section 5.2, above.

A PHA seeking to undertake new construction must receive written approval from HUD of any site selection subject to front-end review prior to entering into any construction contract for that new construction.

B) Analysis of Areas of Minority Concentration

This Section sets forth the methodology that HUD will use in the analysis of the extent of minority concentration, the area of the site, and the housing market area for purposes of the RAD front-end civil rights review. As noted below, this analysis is fact specific and PHAs may submit documentation to inform HUD's analysis in cases where there is strong evidence that an alternative methodology would be more appropriate.

(1) For purposes of RAD, a site is considered to be in an area of minority concentration when either (i) the percentage of persons of a particular racial or ethnic minority within the area of the site is at least 20 percentage points higher than the percentage of that minority group in the housing market area as a whole or (ii) the total percentage of minority persons within the area of the site is at least 20 points higher than the total percentage of minorities in the housing market area as a whole.[39]

(2) For purposes of RAD, the analysis of an area of minority concentration will use census tracts to approximate the "area" of the site but the analysis may consider alternate proposed geographies instead of the census tract in instances where there is strong evidence that such geography is more appropriate. Strong evidence that an alternative geography is more appropriate includes: (i) that the site is close to the edge of the census tract, (ii) that the population of the census tract is heavily influenced by the size of the Converting Project, or (iii) that the local community

[39] The percentage of minorities shall be calculated by subtracting the percentage of White Non-Hispanic persons in the relevant area from 100%. The analysis shall be based on the most recently available decennial census data found at http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_DP_DPDP1&src=pt. However, if such data is more than five years old, and if either the PHA or HUD requests the use of more recent data based on such party's awareness of significant and material shifts in the demographics of the relevant area in the intervening years, the analysis shall be based on the most recent American Communities Survey data.

understanding of the immediate neighborhood dictates a different boundary. Local community understanding of the immediate neighborhood is often informed by factors such as patterns of housing stock (such as different residential densities in different areas or differential housing prices for similar properties), community facilities and amenities (such as schools and commercial areas) or major geographic barriers (such as rivers or interstate highways), among other factors.[40] HUD will determine the site's "area" using the best available evidence and following the legal standards set forth in applicable case law.

(3) For purposes of the RAD analysis under this Section 5.4, a "housing market area" is the geographic region from which it is likely that residents of housing at the proposed site would be drawn for a given multifamily housing project. A housing market area generally corresponds to, as applicable: (i) the Metropolitan Statistical Area (MetroSA); (ii) the Micropolitan Statistical Area (MicroSA); or (iii) if the site is in neither a MetroSA nor a MicroSA, either (x) the county or statistically equivalent area, or (y) the PHA's service area, whichever is larger.[41] The analysis may consider a larger or smaller housing market area in instances where there is strong evidence that such housing market area is more appropriate. Strong evidence that an alternative housing market area is more appropriate may include factors such as regional employment centers and commuting patterns serving such employment centers. A PHA seeking to use an alternative housing market area must consult with HUD and establish to HUD's satisfaction that the methodology for identifying and documenting the alternative housing market area is warranted and sound.

C) The Sufficient Comparable Opportunities Exception

As required by the RAD Notice and noted in Section 5.4(A), one of the exceptions under which the site and neighborhood standards permit new construction in areas of minority concentration is if sufficient, comparable housing opportunities for low-income minority families exist outside areas of minority concentration. This section clarifies HUD's procedures for assessing comparable housing opportunities and evaluating how the proposed new construction will impact the balance of housing choices within and outside areas of minority concentration. It also includes a list of the information PHAs should submit to inform HUD's assessment of relevant factors, and key considerations guiding HUD's analysis of each factor.

Under the governing PBV and PBRA requirements, units are considered comparable opportunities if they are the same household type (e.g., elderly, disabled, family, large family), tenure type (owner, renter), require approximately the same total tenant payment toward rent,

[40] For further explanation, *see, e.g., King v. Harris*, 464 F.Supp.827, 839-41 (E.D.N.Y. 1979).
[41] Items (i) and (ii) are consistent with a Core Based Statistical Area as defined by the Office of Management and Budget. For reference, a Core Based Statistical Area consists of the county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core.

serve the same income group, are located in the same housing market area, and are in standard condition.[42]

It is important to note that the sufficient comparable housing opportunities exception "does not require that in every locality there be an equal number of assisted units within and outside of areas of minority concentration. Rather, application of this standard should produce a reasonable distribution of assisted units each year, that, over a period of several years, will approach an appropriate balance of housing choices within and outside areas of minority concentration. An appropriate balance in any jurisdiction must be determined in light of local conditions affecting the range of housing choices available for low-income minority families and in relation to the racial mix of the locality's population."[43]

HUD will assess "the overall impact of HUD-assisted housing on the availability of housing choices for low-income minority families in and outside areas of minority concentration, and must take into account the extent to which the following factors are present, along with other factors relevant to housing choice."[44] Under this exception, it is not sufficient for one factor to be present, nor is it required that all factors be present, as the analysis must consider all relevant facts and evaluate the totality of the circumstances.

- "A significant number of assisted housing units are available outside areas of minority concentration."[45] While HUD must consider all factors relevant to housing choice, 30% or more of deeply subsidized housing units for very low-income persons would be a significant number. To facilitate HUD's consideration of this factor, a PHA should provide the number, occupancy type, and location of all comparable assisted units.[46]
- "There is significant integration of assisted housing projects constructed or rehabilitated in the past 10 years, relative to the racial mix of the eligible population."[47] To facilitate HUD's consideration of this factor, a PHA should provide the name and location of assisted housing projects constructed or rehabilitated in the PHA's jurisdiction in the past 10 years and the demographic characteristics of the residents of each of these projects;
- "There are racially integrated neighborhoods in the locality."[48] To facilitate HUD's consideration of this factor, a PHA should provide the name and census tracts where these racially integrated neighborhoods are located. In general, HUD will consider a neighborhood racially integrated if the neighborhood does not have a high concentration of persons of a particular race or ethnicity when compared to the housing market area in which the neighborhood is located.

[42] *See* 24 C.F.R. § 983.57(e)(3)(iv) and Appendix III of the RAD Notice, paragraph (e)(1)(A).
[43] 24 C.F.R. § 983.57(e)(3)(iii); *see also* Appendix III of the RAD Notice, paragraph (e)(1).
[44] 24 C.F.R. § 983.57(e)(3)(v); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B).
[45] 24 C.F.R. § 983.57(e)(3)(v)(A) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(i).
[46] Note that this factor is in reference to comparable assisted units that may or may not be in the PHA's portfolio. The presumption stated at the end of this Section (i.e., that sufficient comparable opportunities exist if at least 50% of the comparable hard units in the PHA's portfolio, including PBV developments using the PHA's subsidy, are outside areas of minority concentration) is focused on units within the PHA's portfolio.
[47] 24 C.F.R. § 983.57(e)(3)(v)(B) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(ii).
[48] 24 C.F.R. § 983.57(e)(3)(v)(C) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(iii).

- "Programs are operated by the locality to assist minority families that wish to find housing outside areas of minority concentration."[49] Such programs may include measures such as increasing payment standards in excess of 110% of FMR or the use of Small Area FMRs, including in setting exception rents, or reservation of a percentage of HCVs dedicated to support choice mobility selections or implementation of proven mobility counseling and supports for residents, provided the PHA provides sufficient evidence that it will continue such measures. To facilitate HUD's consideration of this factor, a PHA should provide the names of the applicable program(s); the entity responsible for implementing the program(s) (e.g., city, county, state government); and any information demonstrating that the program(s) has been successful or predictably will achieve success in assisting persons who wish to move to non-concentrated areas.
- "Minority families have benefited from local activities (e.g., acquisition and write-down of sites, tax relief programs for homeowners, acquisitions of units for use as assisted housing units) undertaken to expand choice for minority families outside of areas of minority concentration."[50] To facilitate HUD's consideration of this factor, a PHA should provide the names of the applicable activity(s); the entity responsible for implementing the activity(s) (e.g., city, county, state government); and any information demonstrating that the activity(s) has been successful in expanding choice for minority families outside of areas of minority concentration;
- "A significant proportion of minority households has been successful in finding units in non-minority areas under the tenant-based assistance programs" (e.g., the Housing Choice Voucher programs).[51] To facilitate HUD's consideration of this factor, a PHA should provide the number of minority households receiving Housing Choice Vouchers; the number of minority households using HCVs in non-minority areas; and the non-minority census tracts where the HCVs are being used. While each local situation is distinct and HUD must consider all factors relevant to housing choice, 30% or more of new leases signed by minority heads of household using HCVs located in non-minority areas over a period greater than three years prior to the date of HUD's analysis would be a significant proportion.
- "Comparable housing opportunities have been made available outside areas of minority concentration through other programs."[52] To facilitate HUD's consideration of this factor, a PHA should describe the opportunities that have been made available, the location of those opportunities, and the number of minority families that have benefitted from the program in recent years. Such programs could include choice mobility strategies, acquisition strategies to acquire and add to the PHA's portfolio existing apartments in high opportunity areas and transfers of assistance to high opportunity areas.

HUD may consider evidence based on a reliable housing market analysis in evaluating the foregoing factors, along with other factors relevant to housing choice. In the event HUD

[49] 24 C.F.R. § 983.57(e)(3)(v)(D); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(iv).
[50] 24 C.F.R. § 983.57(e)(3)(v)(E); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(v).
[51] 24 C.F.R. § 983.57(e)(3)(v)(F); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(vi).
[52] 24 C.F.R. § 983.57(e)(3)(v)(G) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(vii).

determines such an analysis would assist in this evaluation, HUD will consult with appropriate parties to establish or accept an appropriate methodology for such an analysis to address HUD's civil rights concerns and to ensure appropriate independence between the analyst and the PHA or Project Owner commissioning and paying for the study.

Absent information to the contrary, for purposes of HUD's front-end review of the PHA's analysis, HUD will apply a presumption that sufficient comparable opportunities exist if at least 50% of the comparable hard units in the PHA's portfolio, including PBV developments using the PHA's subsidy, are outside areas of minority concentration.[53] The PHA's portfolio includes all public housing, PBV and PBRA hard units (including those developed under HOPE VI or Choice Neighborhoods) controlled by the PHA and its instrumentalities or funded using PHA-controlled subsidy. Upon adequate documentation of this presumption, the PHA need not provide additional documentation for HUD's front-end review of the sufficient comparable opportunities exception. This presumption may be rebutted by information to the contrary, including information regarding the preceding factors. In assessing whether sufficient comparable opportunities exist when the presumption does not apply, HUD will consider the factors listed above.

Absent information to the contrary, for purposes of HUD's front-end review of the PHA's analysis, HUD will apply a presumption that sufficient comparable opportunities exist if a set of RAD conversions from a single public housing property, individually or in a combination of transactions, will result in the creation of as many similarly-affordable housing units outside areas of minority concentration as are constructed on the original public housing site. To evaluate the creation of similarly-affordable units, HUD will compare (i) the number of affordable units that will be redeveloped on site, to (ii) the number of similarly-affordable housing units that will be created through new construction, imposition of new long-term affordability restrictions or transfer of RAD assistance to one or more sites outside areas of minority concentration.[54] Similarly-affordable shall mean RAD units compared to RAD units and LIHTC/non-RAD units compared to LIHTC/non-RAD units. The newly created similarly-affordable units must be owned, controlled, sponsored, under common ownership, control or sponsorship, or financially supported by the PHA or by an entity with a managing ownership interest in the Project Owner. When a PHA seeks to claim this exception, HUD prefers that the transaction creating the similarly-affordable units on the site outside areas of minority concentration close (with an immediate or delayed HAP effective date, if applicable) prior to the closing of the RAD conversion in the area of minority concentration. However, if the PHA determines that such a sequence is not reasonably possible, unless otherwise approved by HUD the PHA must provide evidence to HUD that the transfer of assistance to a site outside areas of

[53] When determining the percentage of units outside of areas of minority concentration, the PHA must include the number of units planned at the proposed site in its calculations. While not required, PHAs or Project Owners may assist HUD in consideration of this presumption by submitting to HUD a map produced by the Affirmatively Furthering Fair Housing Data and Mapping Tool ("AFFH-T"), as may be available on the HUD website from time to time, showing the location of publicly assisted housing.

[54] For example, if the PHA proposes to build 25 RAD units, 20 non-RAD LIHTC units and 15 unrestricted units on-site, such a plan could be acceptable if paired with creation of 15 RAD units at one site and 10 RAD units plus 20 non-RAD LIHTC units at a second site. The 15 unrestricted units in the minority concentrated area are not part of the analysis as they are not affordable units.

minority concentration is highly likely to occur and the PHA must contractually agree with HUD to create such units. Evidence that the transfer is highly likely to occur must include:

- The project name and property address of the site of the similarly-affordable units to be created,
- The census tract and data to confirm that it is not in an area of minority concentration,
- Evidence of site control,
- Evidence of zoning to permit construction of the similarly-affordable units if the affordable units are to be created through new construction,
- A reasonable and feasible sources and uses statement for the transaction, and
- Evidence of financing commitments exceeding 90% of the necessary sources to complete the transaction. Evidence of financing commitments must include an LIHTC allocation if the use of LIHTCs is projected.

D) The Overriding Housing Needs Exception

As noted in Section 5.4(A), the second exception under which the site and neighborhood standards permit new construction in areas of minority concentration is if the project is necessary to meet overriding housing needs that cannot be met in that housing market area. The new construction site selection standards under RAD[55] outline two examples of circumstances, consistent with fair housing and other civil rights objectives, that would permit the application of the overriding housing needs exception: (1) when the site is "an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood;" or (2) when the site is "located in a neighborhood experiencing significant private investment that is demonstrably improving the economic character of the area (a "revitalizing area")."[56]

(1) Establishing that a Site is an Integral Part of an Overall Local Strategy for the Preservation or Restoration of the Immediate Neighborhood

To establish that a site is an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood, a PHA must document that the locality has a demonstrated commitment to revitalization that includes or is in addition to the RAD conversion, as demonstrated by the following:

i. The site is located in a defined geographic area that is the subject of an official, currently operational and realistically achievable plan for the improvement or revitalization of the immediate neighborhood (which plan may include areas beyond the immediate neighborhood); and
ii. The Covered Project conforms to, and the site is integral to, the goals, strategies, and objectives of the improvement or revitalization plan.

[55] *See* 24 C.F.R. § 983.57(e)(2) for PBV transactions and paragraph (e) of Appendix III of the RAD Notice for PBRA transactions.
[56] 24 C.F.R. § 983.57(e)(3)(vi); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(viii)(2). In demonstrating an overriding housing need, the "neighborhood" is determined in each situation based on the overall facts and circumstances and cannot be mechanically determined. The "immediate neighborhood" is generally a smaller geographic area than the "neighborhood."

In determining whether such an official, currently operational and realistically achievable plan for the improvement or revitalization of the area exists, HUD will consider relevant factors including, for example, whether:

- The strategy itself, or a plan supporting the strategy, has been enacted, adopted, or ratified by a municipal, county, or state legislative body;
- There has been progress to implement the plan, or the strategy as a whole.[57]
- The plan or strategy as a whole, or the elements applicable to the Covered Project, are consistent with the jurisdiction's land use or zoning code, development regulations, or other official body of laws or rules;
- Strategies or activities under the plan are incorporated in current public, quasi-public agency or major institutional work plans;
- The plan, or the strategy as a whole, includes objectives and initiatives related to the preservation or restoration of a geography larger than the Converting Project and any associated public housing site;
- A jurisdiction has published solicitations or incentives for development projects in the improvement or revitalization area;
- The plan is incorporated in the applicable jurisdiction's Consolidated Plan or other comprehensive community development plan;
- A jurisdiction has explicitly designated the geographic area for improvement or revitalization (e.g., Business Improvement District; Enterprise Zone designation; Promise Zone designation; Choice Neighborhoods designation);
- An implementing agency has retained a construction firm to break ground on the improvement or revitalization; and/or
- An implementing agency has secured financing, such as the issuance of bonds or final approval for tax increment financing.

(2) Establishing that the Site is Located in a "Revitalizing Area"

Evidence that the site is located in a revitalizing area experiencing significant private investment that is demonstrably improving the economic character of the area is also an example of a site which meets an overriding housing need. HUD will consider all relevant factors in making a determination that the site is located in a "revitalizing area" but in particular will consider whether:

i. The neighborhood has demonstrated signs of revitalization, through indicators such as low or declining census tract poverty rates, low or declining violent crime rates or evidence of high or increased educational opportunity, high or increasing median

[57] Indicators of progress should be appropriate to the amount of time since the plan or strategy was developed and there must be a reasonable, supportable expectation that the plan will continue to be implemented. For example, if a plan was launched 3-4 years prior and the initial steps of the plan required implementation of an initiative (such as real estate development) which has a long pre-development planning period, HUD may consider whether there has been activity to seek land development approvals or to develop construction drawings or to secure funding commitments or other activities providing evidence that one or more material elements of the plan or strategy are actually being implemented.

household income, high or increasing homeownership rates and/or high or increased employment; and

ii. There is high private and public investment in retail, commercial, or housing development that has occurred or will imminently occur in the area which may include, among other considerations:
   - Evidence of new or improved retail centers, grocery stores, pharmacies, healthcare facilities, community centers, educational and recreational facilities, municipal services, and transportation serving the neighborhood;
   - Evidence of private and public investment or housing development that has occurred or will imminently occur in the area;
   - Evidence of economic conditions that are impacting the preservation of affordable housing in the neighborhood, including indicators of gentrification such as housing costs rising more sharply in the neighborhood than in the jurisdiction overall, accelerated rates of homeownership in the neighborhood, and disproportionate depletion of larger dwellings for families with children.

(3) Circumstances in Which an Overriding Housing Needs Exception Does Not Apply

A PHA cannot establish that a site meets the overriding housing needs exception if the only reason the need cannot otherwise be feasibly met is that discrimination on the basis of race, color, religion, sex, national origin, age, familial status, or disability renders sites outside areas of minority concentration unavailable or if the use of this standard in recent years has had the effect of circumventing the obligation to provide housing choice.[58] For example, the overriding housing needs exception may not be applied if the reason that the project cannot be sited outside of an area of minority concentration is due to community opposition to the project based on the actual or perceived protected characteristics of the residents or prospective residents of the project. In addition, a recipient may not exclusively rely on this exception as a means of siting projects without creating housing opportunities outside of areas of minority concentration or without preserving existing housing outside of areas of minority concentration.

5.5. Front-End Civil Rights Review for RAD Transactions Involving Transfer of Assistance

A) Applicable Standards

Transfers of assistance are subject to the site selection standards for existing or rehabilitated housing set forth in 24 C.F.R. § 983.57(a)-(d), with the exception of 24 C.F.R. § 983.57(b)(1) and (c)(2), for PBV conversions and Appendix III of the RAD Notice for PBRA conversions. All transfers of assistance to a new site(s) are subject to front-end review by HUD, as required by the RAD Notice and noted in Section 5.3(A)(2) of this Notice. Conversions involving a transfer of assistance may also involve one or more of the other activities which trigger front-end review as described in Section 5.3(A). In transfers of assistance involving any of these activities, HUD

[58] 24 C.F.R. § 983.57(e)(3)(vi) and Appendix III of the RAD Notice, paragraph (e)(2). The PBRA site and neighborhood standards use the phrase "on the basis of race, color, creed, sex or national origin." See Appendix III of the RAD Notice.

will conduct a front-end review based on the requirements applicable to each activity. A PHA must submit documentation for the front-end civil rights review of each specific activity as required by the relevant sections of this Notice.

B) Analysis of Transfers of Assistance

Through the front-end review of transfers of assistance by FHEO, HUD seeks to assist the PHA in avoiding discrimination on the basis of race, color, national origin, religion, sex, disability or familial status. The front-end review of transfers of assistance will apply the site selection standards for existing/rehabilitated housing.[59] This review shall consider:

(1) The accessibility of the proposed site for persons with disabilities;

(2) The ability of the RAD conversion to remediate accessibility concerns;

(3) Whether the transfer of assistance would result in assisted units being located in an area where the total percentage of minority persons is significantly higher than the total percentage of minority persons in the area of the original public housing site or in an area where the percentage of persons of a particular racial or ethnic minority is significantly higher than the percentage of that minority group in the area of the original public housing site.[60] For purposes of this analysis, HUD will examine the minority concentration of:

(a) the census tract of the original public housing site compared to the census tract of the proposed site; and
(b) an area comprised of the census tract of the original public housing site together with all adjacent census tracts compared to an area comprised of the census tract of the proposed site together with all adjacent census tracts.

(4) Whether the site selection has the purpose or effect of:

(a) Excluding individuals from, denying them the benefits of, or subjecting them to discrimination under the RAD program or the applicable rental assistance program;
(b) Excluding qualified individuals with disabilities from or denying them the benefit of the RAD program or the applicable rental assistance program, or otherwise subjecting them to discrimination;
(c) Defeating or substantially impairing the accomplishment of the objectives of the RAD program or the applicable rental assistance program with respect to qualified individuals with disabilities; and

[59] 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, paragraphs (a) through (d). The site selection standards for existing/rehabilitated housing do not apply the minority concentration test used for new construction found at 24 C.F.R. § 983.57(e)(3) and Appendix III of the RAD Notice, paragraph (e).
[60] While this review is not explicitly called out in 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, it is derived from HUD's and the PHA's obligations to comply with civil rights laws and regulations, including those referenced in 24 C.F.R. § 983.57(b)(2) and Appendix III of the RAD Notice.

(d) Excluding individuals with disabilities (including members of the public with disabilities), denying them benefits or subjecting them to discrimination.

Under the RAD Notice, there are other standards for review of a transfer of assistance which are not examined as part of the front-end civil rights review but are examined as part of the RAD Financing Plan review (e.g., criteria formulated for transfers under Section 8(bb) of the United States Housing Act of 1937 regarding neighborhoods with highly concentrated poverty). Identification of considerations for the front-end review do not preclude review by HUD of all standards referenced in the RAD Notice.

5.6. Front-End Civil Rights Review for RAD Transactions Involving Reduction in Number of Units, Changes in Bedroom Distribution of Units and Changes in Occupancy Requirements

The RAD Notice allows PHAs to reduce the number of units, change the bedroom distribution of units, or change the occupancy of projects as part of their RAD conversion.[61] However, the RAD Notice also provides that such changes (including de minimis changes) must undergo a front-end civil rights review and receive approval from HUD prior to submission of the Financing Plan. The Checklist will require data for review along with an explanation, backed by sufficient evidence, of how the PHA determined that that the proposed change will not result in discrimination on the basis of race, color, national origin, religion, sex, disability, familial status, actual or perceived sexual orientation, gender identity or marital status.[62]

A) Review of Reductions in the Number of Units, Reductions or Increases in the Number of UFAS Accessible Units or Changes in Bedroom Distribution

This Section describes the considerations relevant to a front-end review of reductions in units, changes in the number of UFAS accessible units or changes in bedroom distribution. Such changes must not be the result of an intentional effort to discriminate against members of a protected class. For example, reductions or changes, including reductions in UFAS accessible units or which would impede residents with disabilities from having live-in aides, that intended to exclude persons with disabilities would be unlawful discrimination because of a disability.

[61] *See* Sections 1.4.A.4 and 1.4.A.10 of the RAD Notice.

[62] Reductions in the number of units, changes in the bedroom distribution of units, or changes in occupancy violate the Fair Housing Act (the Act) if they have a discriminatory effect on the basis of race, color, national origin, religion, sex, disability, or familial status. Unlawful housing discrimination may be established by a policy's or practice's discriminatory intent or by its discriminatory effect, even if not motivated by discriminatory intent, consistent with the standards outlined in 24 C.F.R. § 100.500. A policy or practice can have an unjustified discriminatory effect, even when the provider had no intent to discriminate. Under this standard, a facially-neutral policy or practice that has a discriminatory effect violates the Act if it is not supported by a legally sufficient justification. In addition, the policy or practice violates the Act if the housing developer or provider intentionally discriminates, including for example, by reducing the number of bedrooms with the intent of limiting families with children. Furthermore, the policy or practice may also violate the Act where it creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin. In addition, any changes must conform with the Equal Access rule requirement that determinations of eligibility for housing that is assisted by HUD or subject to a mortgage insured by the FHA shall be made in accordance with program eligibility requirements, and the housing must be made available, without regard to actual or perceived sexual orientation, gender identity or marital status. 24 C.F.R. § 5.105(a)(2).

Similarly, replacing larger units with smaller units so as to exclude families with children would be unlawful discrimination because of familial status.

Additionally, reductions in units or changes in bedroom distribution must not have an unjustified discriminatory effect on members of a protected class. For example, a reduction in units could have a discriminatory impact if it excludes members of a particular race or religion. Reductions or changes that have a disparate impact on a protected class are unlawful under the Fair Housing Act if they are not necessary to achieve a substantial, legitimate, nondiscriminatory interest of the developer or housing provider, or if such interest could be served by another practice that has a less discriminatory effect.

The RAD Notice allows for a de minimis reduction in units at Converting Projects, which includes both a small number of units as well as the reduction of certain units that have been vacant for 24 months prior to application, that are being or will be used for social service delivery, or efficiencies that will be reconfigured to one-bedroom units.[63] In addition, a PHA converting multiple properties can consolidate the de minimis reductions derived from multiple properties at a small number of sites. The RAD Notice also allows for changes in bedroom distribution. Such de minimis reductions are still subject to front end civil rights review and applicable fair housing and civil rights laws.

HUD shall conduct a front-end civil rights review if the plan for a Converting Project results in:

- A reduction in the number of dwelling units in any of the following categories: (i) units with two bedrooms, (ii) units with three bedrooms or (iii) units with four or more bedrooms.
- A reduction in the number of UFAS accessible units;
- An increase in the number of UFAS accessible units for persons with mobility impairments beyond 10% of the units in the Covered Project or 1 unit, whichever is greater.
- An increase in the number of UFAS accessible units for persons with vision and hearing impairments beyond 4% of the units in the Covered Project or 1 unit, whichever is greater.

When a Converting Project is subject to a front-end civil rights review under this subsection, the PHA shall submit to HUD the relevant part of the Checklist together with a justification which must demonstrate that the changes are not the result of discriminatory intent and will not have a discriminatory effect on members of protected classes, particularly families with children and individuals with disabilities. Relevant data for this analysis of the proposed change at the project may include the PHA's overall affordable housing stock, the demand for affordable housing in the market as evidenced by information such as the overall jurisdiction and regional demographic data available from the AFFH Data and Mapping Tool (e.g., both basic demographic and disproportionate housing needs data), the PHA's waiting list or a reliable market study of households seeking assisted housing, compared to the relative proportions of

[63] *See* Section 1.4.A.4 of the RAD Notice.

units serving any particular household type in the proposed project, the PHA's total housing stock or all assisted housing in the area.

For any increase in UFAS units subject to front-end review, HUD will assess indicators of local need (see Section 5.7(B), below) and whether the change would operate to concentrate individuals with disabilities in a particular property or to exclude individuals with certain types of disabilities from a particular property.

B) Review of Changes in Occupancy Type

RAD conversions that result in the implementation of an admissions preference (e.g., residency preferences or restrictions) at the Covered Project that would alter the occupancy of the property (e.g., family units converting to elderly units, elderly/disabled units converting to elderly only units) are subject to a front-end civil rights review by HUD pursuant to the RAD Notice and Section 5.3(A). A PHA must demonstrate that the proposed change in occupancy type is consistent with the demand for affordable housing in its jurisdiction as demonstrated by factors such as the demographics of its current occupancy, the demographics of its waiting list or a market study. Such preferences, restrictions, or geographic residency preferences must be reflected in a PBRA project's Affirmative Fair Housing Marketing Plan (AFHMP) or, for a PBV project, the PHA's Administrative Plan.

5.7. Other Front-End Civil Rights Review for RAD Transactions

A) Conversions of Assistance in Which the Construction Schedule Indicates that Relocation is Likely to Exceed 12 Months.

The front end civil rights review shall focus on whether the relocation will result in discrimination on the basis of race, color, national origin, religion, sex, disability, and familial status, based primarily, but not exclusively, on the data required in the Checklist.

B) Conversions of Assistance Involving New Construction or Substantial Alteration, as those terms are defined by Section 504.

While the PHA is responsible for compliance with all requirements described in Section 4, above and in this subsection, the front-end review will be conducted based on a review of the Checklist and shall include confirming the provision of any required accessible units and confirming the PHA is applying the appropriate accessibility standards. HUD will require the PHA to provide information regarding the provision of at least the minimum number of units accessible for persons with mobility impairments and units accessible for persons with hearing and vision impairments as required by applicable law (generally 5% of units accessible for persons with mobility impairments and an additional 2% of units accessible for persons with hearing and vision impairments). For purposes of establishing an upper threshold of accessible units below which RAD front-end review will not be required, HUD will accept that up to 10% of units accessible for persons with mobility impairments and up to 4% of units accessible for persons with hearing and vision impairments is consistent with local need, without further review, absent information to the contrary. HUD will consider a PHA's request for higher percentages based, to HUD's satisfaction, on reliable indicators of local need, such as census data or other available current data. HUD is available to assist PHAs in determining appropriate indicators of local

need for units with accessible features. The RAD conversion scope of work submitted with the Financing Plan must reflect the construction or retrofitting of residential units and public and common use areas to comply with all applicable accessibility requirements.

C) Remedial Agreements and Orders.

Front-end review in situations where the Converting Project or PHA is subject to enforcement actions or binding voluntary compliance agreements, settlement agreements, conciliation agreements, or consent decrees or orders of the nature described in Sections 5.3(A)(8) and 5.3(A)(9) shall be conducted on a case-by-case basis as appropriate to the specific situation.

5.8. Affirmative Fair Housing Marketing Plan (AFHMP) Requirements for Projects Converting to PBRA Assistance

For all projects converting to PBRA assistance, a PHA or Project Owner must complete form HUD-935.2A, the Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing, and submit it to HUD for approval with the RAD Financing Plan.[64] Affirmative Fair Housing Marketing requirements are designed to achieve a condition in which individuals of similar income levels in the same housing market area have similar housing choices available to them regardless of their race, color, national origin, religion, sex, disability, or familial status.[65] They are also a means to carry out the mandate of Section 808(e)(5) of the Fair Housing Act that HUD administer its programs and activities in a manner to affirmatively further fair housing. These requirements mandate that PHAs or Project Owners identify groups that are least likely to apply for upcoming housing opportunities and to implement special marketing and outreach activities to ensure that these groups are aware of these opportunities.

The AFHMP must be submitted to HUD with the Financing Plan. A separate AFHMP is required for each distinct PBRA HAP contract. The PHA must submit an AFHMP even if the project has an existing waiting list and is not accepting new applicants. The PHA or Project Owner should consult the instructions in the form HUD 935.2A and HUD's Implementing Affirmative Fair Housing Marketing Requirements Handbook (HUD Handbook 8025.1) for guidance on completing the AFHMP and carrying out an affirmative marketing program. The Handbook provides a detailed resource on the content of the AFHMP, which includes marketing activities, residency preferences, and staff training.

When submitting an AFHMP for HUD approval, the PHA or Project Owner must ensure that the occupancy designation and any residency preferences are consistent with the PHA Plan or Significant Amendment to the PHA Plan, that such designation and preferences are consistent with the Checklist submitted to HUD and that the AFHMP includes affirmative marketing

[64] The most recent version of the AFHMP is HUD Form 935.2A, OMB Approval Number 2529-0013. *See* 24 C.F.R. § 880.601(a)(2) and 24 C.F.R. § 200.615; *see also* Section 10.8 of the Multifamily Accelerated Processing (MAP) Guide. The PHA or its management agent should consult the instructions in the form HUD 935.2A and HUD's Implementing Affirmative Fair Housing Marketing Requirements Handbook (HUD Handbook 8025.1) for guidance on completing the AFHMP and carrying out an affirmative marketing program. The Handbook provides a detailed resource on the content of the AFHMP, which includes marketing activities, residency preferences, and staff training.

[65] *See* 24 C.F.R. § 200.610.

activities that are consistent with its occupancy designation and the populations identified as least likely to apply. Any subsequent changes to occupancy designation or residency preferences shall be proposed, submitted and reviewed in accordance with standard PBRA requirements. If a PHA or Project Owner plans to adopt any local or residency preferences, the Project Owner must submit its Tenant Selection Plan along with the AFHMP (see HUD Handbook 4350.3, page 4-4).

The Multifamily Housing Office of Asset Management and Portfolio Oversight and the Office of Fair Housing and Equal Opportunity ("FHEO") review the AFHMP. FHEO issues HUD's official letter of approval or disapproval. Disapproval letters will specify the reason a plan was rejected and the revisions required. The PHA or Project Owner must make the required changes and resubmit a corrected plan to HUD for approval.

The PBRA contract becomes effective on the first day of a month, following closing. Approval of the AFHMP is not a condition to closing of the RAD conversion. When the project is preparing to accept applications, it must follow its approved AFHMP to ensure that groups least likely to apply are aware of the housing opportunities. The Project Owner is responsible for ensuring that the AFHMP is in place throughout the life of any FHA mortgage or PBRA contract. The Project Owner may not market or lease any unit not occupied by a household exercising its right to remain in or return to the Covered Project prior to approval of the AFHMP. Marketing or leasing includes the solicitation, distribution or acceptance of applications or development of a waiting list.

SECTION 6. RELOCATION REQUIREMENTS

In some cases, as explained in this Section, the activities associated with the RAD transaction may require the relocation of residents. In the event of acquisition, demolition, construction or rehabilitation activities performed in connection with a RAD conversion, the PHA and/or Project Owner[66] should plan such activities to reasonably minimize any disruption to residents' lives, to ensure that residents are not exposed to unsafe living conditions and to comply with applicable relocation, fair housing and civil rights requirements. As discussed in Section 6.1, below, a written relocation plan is required in some circumstances and strongly encouraged for any conversion resulting in resident moves or relocation. Further, the obligations due to relocating residents under RAD are broader than URA relocation assistance and payments and RAD specifies requirements which are more protective of residents than standard URA requirements, including additional notices (see Section 6.6) and a right to return (see Section 6.2). This Notice requires that certain information be provided to all households, beginning prior to submission of the RAD application.

Any resident who moves as a direct result of acquisition, rehabilitation or demolition for an activity or series of activities associated with a RAD conversion may, depending on the circumstances and length of time of the relocation, be eligible for relocation assistance and payments under the URA. Additionally, Section 104(d) relocation and one-for-one replacement

[66] Under the URA, the term "displacing agency" refers to 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, the displacing agency may be either the PHA or the Project Owner, as determined by the allocation of roles and responsibilities between the PHA and Project Owner.

housing requirements may also apply when CDBG- or HOME-funds are used in connection with a RAD conversion. The applicability of the URA or Section 104(d) to RAD conversions is fact-specific, which must be determined in accordance with the applicable URA and Section 104(d) regulations.[67]

Eligibility for specific protections under this Notice applies to any person residing in a Converting Project who is legally on the public housing lease, has submitted an application to be added to an existing lease, or is otherwise in lawful occupancy at the time of the issuance of the CHAP and at any time thereafter until conversion of assistance under RAD. All such residents of a Converting Project have a right to return and are eligible for relocation protections and assistance as provided by this Notice. The eligibility criteria set forth in this paragraph apply to the protections under this Notice regardless of whether residents or household members meet the statutory and regulatory requirements for eligibility under URA.[68]

6.1. Planning

If there is a possibility that residents will be relocated as a result of acquisition, demolition, or rehabilitation for a Converting Project, PHAs must undertake a planning process in conformance with the URA statutory and regulatory requirements in order to minimize the adverse impact of relocation (*see* 49 § C.F.R. 24.205). PHAs must also ensure that their relocation planning is conducted in compliance with applicable fair housing and civil rights requirements.

The PHA shall prepare a written relocation plan if the RAD conversion involves permanent relocation (including, without limitation, a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than one year. While a written relocation plan is not required for temporary relocation lasting one year or less, HUD strongly encourages PHAs, in consultation with any applicable Project Owners, to prepare a written relocation plan for all RAD conversions to establish their relocation process clearly and in sufficient detail to permit consistent implementation of the relocation process and accurate communication to the residents. Appendix II contains recommended elements of a relocation plan.

During the planning stages of a RAD transaction and based on the results of this planning process, a PHA must submit applicable portions of the Checklist described in Section 5.3(B) to HUD, together with any required backup documentation, as early as possible once the information covered in the applicable part is known.[69] All parts of the Checklist must be submitted to HUD prior to submission of the Financing Plan. The Checklist will allow HUD to assist the PHA to comply, and to evaluate the PHA's compliance, with relocation requirements, including civil rights requirements related to relocation.

[67] 42 U.S.C. § 4601 *et seq*., 42 U.S.C. § 5304(d), and their implementing regulations at 49 C.F.R Part 24 and 24 C.F.R. Part 42 subpart C.
[68] A nonexclusive listing of persons who do not qualify as displaced persons under URA is at 49 C.F.R. 24.2(a)(9)(ii). See also, Paragraph 1-4(J) of HUD Handbook 1378. See Section 6.5 of this Notice for discussion of the date of "initiation of negotiations."
[69] The Checklist refers to the existing FHEO Accessibility and Relocation Checklist until a revised Checklist is approved for use pursuant to the Paperwork Reduction Act.

The following presents a general sequencing of relocation planning activities within the RAD conversion process for informational and planning purposes only. Specific requirements are set forth in the provisions of this Notice.

Stage	Activities
1. Prior to submission of RAD application	• Determine potential need for relocation in connection with proposed conversion plans. • Meet with residents to discuss proposed conversion plans, communicate right to return, and solicit feedback. • Provide the *RAD Information Notice* (RIN) to residents as described in Section 6.6(A) of this Notice.
2. After submission of RAD application	• Assess the need for relocation planning in connection with proposed conversion plans. Determine if technical assistance would be beneficial to ensuring compliance with relocation requirements. • Survey residents to inform relocation planning and relocation process. • Develop a relocation plan (see Appendix II for recommended content). • Prepare Significant Amendment to PHA Plan and engage with the Resident Advisory Board, residents and the public regarding Plan amendment.[70]
3. Following issuance of the CHAP, or earlier if warranted	• Provide the *General Information Notice* (GIN) to residents when the project involves acquisition, rehabilitation, or demolition as described in Section 6.6(B) of this Notice and relocation may be required.
4. While preparing Financing Plan	• Discuss the outlines of the conversion plans and their impact on relocation with the HUD transaction manager. • Refine the plan for relocation and integrate the construction schedule into the relocation strategy; seek to minimize off-site or disruptive relocation activities. • Identify relocation housing options . • Budget for relocation expenses and for compliance with accessibility requirements. • Submit the Checklist and, where applicable, the relocation plan. • If the conversion involves acquisition, at the discretion of the Project Owner issue Notice of Intent to Acquire (NOIA). • If a NOIA is issued, at the discretion of the Project Owner provide residents with appropriate relocation notices as

[70] Alternatively, the PHA may submit a new PHA Five-Year or Annual Plan, especially if it is on schedule to do so. Under any scenario, the PHA must consult with the Resident Advisory Board and undertake the community participation process.

Stage	Activities
	described in Section 6.6(C) through 6.6(E) of this Notice at this time.
5. From RAD Conversion Commitment (RCC) to Closing	• Meet with residents to describe approved conversion plans and discuss required relocation. • The effective date of the RCC marks the date of "Initiation of Negotiations" (ION), as defined in the URA (49 § C.F.R. 24.2(a)(15)). • If no NOIA was provided while preparing the Financing Plan, provide residents with appropriate relocation notices as described in Section 6.6(C) through 6.6(E) of this Notice. • Resident relocation may begin following the effective date of the RCC, subject to applicable notice requirements.
6. Post-Closing	• Ongoing implementation of relocation • Notify the residents regarding return to the Covered Project as described in Section 6.6(F) of this Notice • Implementation of the residents' right to return

6.2. Resident Right to Return

Any public housing or Section 8 assisted resident that may need to be relocated temporarily to facilitate rehabilitation or construction has a right to return to an assisted unit at the Covered Project once rehabilitation or construction is complete.[71] Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a project's conversion of assistance. The Project Owner satisfies the RAD right to return to a Covered Project if the Project Owner offers the resident household either: a) a unit in the Covered Project in which the household is not under-housed; or b) a unit in the Covered Project which provides the same major features as the resident's unit in the Converting Project prior to the implementation of the RAD conversion. In the case of a transfer of assistance to a new site, residents of the Converting Project have the right to reside in an assisted unit meeting the requirements set forth in this paragraph at the Covered Project (the new site) once the Covered Project is ready for occupancy in accordance with applicable PBV or PBRA requirements.

If proposed plans for a Converting Project would preclude a resident from returning to the Covered Project, the resident must be given an opportunity to comment and/or object to such plans. Examples of project plans that may preclude a resident from returning to the Covered Project include, but are not limited to:

- Changes in bedroom distribution which decrease the size of units such that the resident would be under-housed;[72]

[71] The right to return is not a right to any specific unit in the Covered Project. Tenancies other than public housing or Section 8 assisted residents (such as commercial tenants) do not hold a right to return and are subject to standard relocation requirements applicable to such tenants under the URA.
[72] See the RAD Notice for a description of the procedures that must be undertaken if a resident is over-housed.

- Where a) the PHA is reducing the number of assisted units at a property (if authorized to do so under Section 1.5.B of the RAD Notice) and b) the resident cannot be accommodated in the remaining assisted units;
- The imposition of income eligibility requirements, such as those associated with LIHTC or other program financing, under which the current resident may not be eligible;[73] and
- Failure to provide reasonable accommodation to an individual with disabilities, in violation of applicable law, which reasonable accommodation may include installation of accessibility features that are needed by the individual with disabilities.[74]

If the resident who would be precluded from returning to the Covered Project objects to such plans, the PHA must alter the project plans to accommodate the resident's right to return to the Covered Project.

If the resident who would be precluded from returning to the Covered Project prefers to voluntarily and permanently relocate rather than object to the project plans, the PHA must secure informed, written consent to a voluntary permanent relocation in lieu of returning to the Covered Project and must otherwise comply with all the provisions of Section 6.10, below, regarding alternative housing options. The PHA cannot employ any tactics to pressure residents into relinquishing their right to return or accepting alternative housing options. A PHA may not terminate a resident's lease if the PHA fails to obtain the resident's consent and the resident seeks to exercise the right to return.

In the case of a multi-phase transaction, the resident has a right to return to the Covered Project or to other converted phases of the property which have converted and are available for occupancy at the time the resident is eligible to exercise the right to return. A relocated resident should get the benefit of improvements facilitated by the resident's relocation and conversion and completion of future phases cannot be assured. In most cases, this means that the resident's right to return must be accommodated within the Covered Project associated with resident's original unit. However, in those cases where improvements to multiple phases of a site are occurring simultaneously, the PHA or Project Owner may treat multiple Covered Projects on the same site as one for purposes of the right to return. If the PHA or Project Owner seeks to have the resident exercise the right of return at a future phase, the PHA or Project Owner would need to secure the resident's consent to such plan as an alternative housing option pursuant to Section 6.10, below.

In implementing the right of return, the Project Owner shall comply with all applicable fair housing laws and implementing regulations, including, but not limited to, the Fair Housing Act,

[73] In these cases, a PHA may elect to exclude some units from the applicable financing program, for example, claiming LIHTC for a subset of the units and not claiming tax credits in connection with the units occupied by households over the LIHTC maximum eligibility of 60% of AMI.

[74] Refer to the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Reasonable Modifications Under the Fair Housing Act (March 5, 2008), at http://www.hud.gov/offices/fheo/disabilities/reasonable_modifications_mar08.pdf for additional detail regarding applicable standards for reasonable accommodations and accessibility features which must be provided. If the resident has paid for installation of accessibility features in the resident's prior unit, the PHA or Project Owner shall pay for the installation of comparable features in the new unit. Violations of law may also result in other sanctions.

Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and Titles II and III of the Americans with Disabilities Act.

6.3. Admissions and Continued Occupancy Requirements

Resident households may not be denied relocation housing or the right to return based on rescreening, income eligibility, or income targeting. PHAs may only offer housing options with screening, income eligibility or income targeting requirements if the impacted residents meet the admission and occupancy policies applicable to such housing. However, whether or not in a temporary relocation situation, the household remains subject to the applicable program policies regarding continued occupancy of an assisted unit by an incumbent resident of the unit.

6.4. Types of Moves and Relocation

Any time project plans require a resident to move from their current unit, the resident is eligible for assistance as described in this Notice. Assistance may vary depending on the options provided to residents, whether the relocation is temporary or permanent and, if applicable, the length of time the resident is in temporary accommodations.[75] In all circumstances, the move or relocation must be in compliance with applicable requirements of this Notice and consistent with applicable fair housing and civil rights requirements. Each type of move is discussed below.

A) Moves within the same building or complex of buildings[76]

Temporary or permanent moves within the same building or complex of buildings may be appropriate given the extent of work to be completed to permit phasing of rehabilitation or construction. Moves within the same building or complex of buildings are not considered relocation under RAD and a tenant generally does not become displaced under the URA. Whether permanent (i.e., the tenant will move to and remain in an alternative unit) or temporary (i.e., the tenant will move to another unit and return to their original unit), the PHA or Project Owner must reimburse residents for all reasonable out-of-pocket expenses incurred in connection with any move and all other terms and conditions of the move(s) must be reasonable.[77] The final move must be to a unit which satisfies the right to return requirements specified in Section 6.2 of this Notice.

[75] PHAs should note that the definitions of "permanent" vary between the URA and RAD. For example, "permanent displacement" under the URA includes moves from the original building or complex of buildings lasting more than one year. The RAD Notice, meanwhile, considers "permanent relocation" to be separation from the RAD-assisted unit upon completion of the conversion and any associated rehabilitation and construction. The duration of a temporary move may exceed one year. In the case of a transfer of assistance, it is not permanent relocation under RAD when the resident must move from the original complex of buildings to the destination site in order to retain occupancy of the RAD-assisted unit.

[76] An example of relocation within the same building or complex of buildings would be if one floor of a multi-story building is vacant, and the PHA is moving residents from another floor to the vacant units.

[77] Failure to reimburse residents for moving or other out-of-pocket expenses and any other terms and conditions of the move which may be unreasonable may result in the resident becoming a displaced person under the URA if the resident subsequently moves from the property.

B) Temporary relocation lasting one year or less

If a resident is required to relocate temporarily, to a unit not in the same building or complex of buildings, for a period not expected to exceed one year in connection with the RAD conversion, the resident's 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, increased housing costs (e.g., rent and utilities), meals if the temporary housing lacks cooking facilities (e.g., during a short hotel stay, whether or not on an emergency basis) and other applicable expenses.[78]

C) Temporary relocation initially expected to last one year or less, but which extends beyond one year

In the event that a resident has been temporarily relocated, to a unit not in the same building or complex of buildings, for a period which was anticipated to last one year or less but the temporary relocation in fact exceeds one year, the resident qualifies as a "displaced person" under the URA and as a result immediately becomes eligible for all permanent relocation assistance and payments as a "displaced person" under the URA, including notice pursuant to Section 6.6(E). 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 or Project Owner shall offer the resident the opportunity to choose to voluntarily permanently relocate with the offered URA assistance or to choose to remain temporarily relocated based on updated information from the PHA or Project Owner about when they can return to the completed RAD unit. The PHA or Project Owner must present this opportunity to the resident when the temporary relocation extends beyond one year and each time thereafter that the temporary relocation extends beyond the previously anticipated duration. In presenting such opportunity, the PHA or Project Owner must inform the resident in writing that his or her acceptance of voluntary permanent relocation, with the associated assistance, would terminate the resident's right to return to the Covered Project. The PHA or Project Owner must provide the resident with at least 30 days to decide whether to remain in temporary relocation status or to voluntarily relocate permanently.

D) Temporary relocation anticipated to last more than one year

When the PHA anticipates that the temporary relocation, to a unit not in the same building or complex of buildings, will last more than one year, but the resident is retaining the resident's right to return to the Covered Project, the resident is considered temporarily relocated under RAD and is eligible to receive applicable temporary relocation assistance and payments. Under the URA, the resident becomes eligible to receive applicable relocation assistance and payments as a "displaced person" when the temporary relocation period exceeds one year and each time thereafter that the temporary relocation extends beyond the previously anticipated duration, at

[78] HUD Handbook 1378, Chapter 2, Section 2-7 governs activities subject to URA requirements and informs, but is not binding upon, any RAD activities not governed by the URA. PHAs may also refer to HUD Form 40030.

which time the PHA or Project Owner shall offer the resident the opportunity to choose to voluntarily permanently relocate or to remain temporarily relocated, as described in Section 6.4(C), above.

In order to allow residents to make the election earlier than required under the URA (thereby avoiding a year in temporary relocation housing prior to electing voluntary permanent relocation), if the PHA or Project Owner anticipates that temporary relocation will last more than one year, the PHA or Project Owner shall provide the resident with an initial option to (a) be temporarily relocated, retain the right to return to the Covered Project when a unit becomes available and receive assistance, including temporary housing and reimbursement for all reasonable out-of-pocket expenses associated with the temporary relocation, or (b) accept RAD voluntary permanent relocation assistance and payments equivalent to what a "displaced person" would receive under the URA. The PHA or Project Owner must inform the resident in writing that his or her acceptance of voluntary permanent relocation, with the associated assistance, would terminate the resident's right to return to the Covered Project. The PHA or Project Owner must provide the resident with at least 30 days to decide whether to remain in temporary relocation status or to voluntarily relocate permanently.

E) Permanent moves in connection with a transfer of assistance

In cases solely involving a transfer of assistance to a new site, resident relocation from the Converting Project to the Covered Project is not, by itself, generally considered involuntary permanent relocation under RAD. However, the URA and/or Section 104(d) is likely to apply in most cases. In cases of a transfer of assistance to a new site where it has also been determined that the URA and/or Section 104(d) apply to the transfer of assistance, residents may be eligible for all permanent relocation assistance and payments for eligible displaced persons under the URA and/or Section 104(d). If the URA applies to a move of this type, the PHA or Project Owner must make available at least one, and when possible, three or more comparable replacement dwellings pursuant to 49 C.F.R. § 24.204(a). However, provided the transfer of assistance unit meets the URA definition of a comparable replacement dwelling pursuant to 49 C.F.R. § 24.2(a)(6), that unit could in fact represent the most comparable replacement dwelling as determined by the agency for purposes of calculating a replacement housing payment, if any, under 49 C.F.R. § 24.402.

Whether or not the URA and/or Section 104(d) apply, under RAD the residents are entitled to relocation assistance and payments, including counseling in preparation for the relocation, written notices of the relocation (including a 90-day RAD Notice of Relocation), and reimbursement for all reasonable out-of-pocket expenses, including moving expenses, incurred in connection with the move. It should be noted that the RAD relocation assistance and payments provided to transferring residents in this paragraph differ from those required under the URA and/or Section 104(d) as described above. Where both frameworks apply, the residents must receive the more extensive protections offered under either framework.

If HUD determines that the distance from the Converting Project to the site of the Covered Project is significant and the resident could not reasonably be required to move to the new site, then HUD will require the PHA to adjust project plans to accommodate the resident in an assisted unit (e.g., a public housing unit, some other project-based Section 8 unit or a market unit

with a housing choice voucher) within a reasonable distance of the site of the Converting Project. HUD will evaluate whether this requirement applies on a case by case basis, considering whether the distance would impose a significant burden on residents' access to existing employment, transportation options, schooling or other critical services. Accommodating the resident may also be satisfied by the resident's consent to an alternative housing option pursuant to Section 6.10. The requirement set forth in this paragraph is in addition to all protections, including, for example, the offer of comparable replacement dwellings, which are required in all instances where a transfer of assistance is subject to the URA and/or Section 104(d).

F) Voluntary permanent relocation

A resident may elect to relinquish their right of return and consent to voluntary permanent relocation pursuant to an alternative housing option offered and accepted according to the procedures described in Section 6.10, which Section specifies protections to ensure the resident's decision is fully informed. By selecting voluntary permanent relocation, the resident is electing to receive RAD permanent relocation assistance and payments which are equivalent to the relocation payments and assistance required to be provided to a "displaced person" pursuant to the regulations implementing the URA.

6.5. Initiation of Negotiations (ION) Date

Eligibility for URA relocation assistance is effective on the date of initiation of negotiations (ION) (49 C.F.R. § 24.2(a)(15)). For Converting Projects, the ION date is the effective date of the RCC. The ION date is also typically the date when PHAs can begin to issue RAD Notices of Relocation (except in the case of acquisitions when the PHA can issue a Notice of Intent to Acquire and RAD Notices of Relocation prior to the ION date). Any person who is in lawful occupancy on the ION date is presumed to be entitled to relocation payments and other assistance.

PHAs and Project Owners should note that prior to the ION date, a resident may be eligible as a displaced person for permanent relocation assistance and payments under the URA if HUD determines, after analyzing the facts, that the resident's move was a direct result of the project. However, resident moves taken contrary to specific instructions from the PHA or Project Owner (for example, contrary to instructions not to move if contained in a General Information Notice) are generally not eligible as a displaced person under the URA.

6.6. Resident Relocation Notification (Notices)

PHAs and Project Owners are encouraged to communicate regularly with the residents regarding project plans and, if applicable, the resulting plans for relocation. When residents may be relocated for any time period (including, without limitation, a move in connection with a transfer of assistance), written notice must be provided to the resident heads of households, including the notices listed below as applicable.[79] PHAs and Project Owners are also encouraged to provide

[79] The notices required under Sections 6.6(B) through 6.6(E) must be delivered in accordance with URA resident notification requirements, including the requirement that the notice be personally served or delivered by certified or registered first class mail return receipt requested. All notices must be delivered to each household (i.e., posting in

additional relocation notices and updates for the residents' benefit as appropriate for the specific situation.

To ensure that all residents understand their rights and responsibilities and the assistance available to them, consistent with URA requirements at 49 C.F.R. § 24.5 and civil rights requirements, PHAs and Project Owners must ensure effective communication with individuals with disabilities, including through the provision of appropriate auxiliary aids and services, such as interpreters and alternative format materials. Similarly, PHAs and Project Owners are required to take reasonable steps to ensure meaningful access for LEP persons in written and oral materials. Each notice shall indicate the name and telephone number of a person to contact with questions or for other needed help and shall include the number for the telecommunication device for the deaf (TDD) or other appropriate communication device, if applicable, pursuant to 24 C.F.R. §8.6(a)(2).

The purpose of these notifications is to ensure that residents are informed of their potential rights and, if they are to be relocated, of the relocation assistance available to them. Two initial notices launch this effort and provide critical information regarding residents' rights. The first, the RAD Information Notice, is to be provided at the very beginning of the RAD conversion planning process in order to ensure residents understand their rights, to provide basic program information and to facilitate residents' engagement with the PHA regarding project plans. The GIN, meanwhile, provides information specifically related to protections the URA provides to impacted residents. Subsequent notices provide more detailed information regarding relocation activities specific to the household, including tailored information regarding eligibility and timelines for relocation.

PHAs should note that a resident move undertaken as a direct result of the project may be eligible to receive relocation assistance and payments under the URA even though the PHA has not yet issued notices to them. Sample notices which may be used as-is or modified to fit the peculiarities of each situation are provided on the RAD website at www.hud.gov/rad.

A) RAD Information Notice

The RAD Information Notice is to be provided to residents at the very beginning of the RAD conversion planning process in order to convey general written information on potential project plans and residents' basic rights under RAD, and to facilitate residents' engagement with the PHA regarding the proposed RAD conversion. The PHA shall provide a RAD Information Notice to all residents of a Converting Project prior to the first of the two meetings with residents required by the RAD Notice, Section 1.8.2, and before submitting a RAD Application. This RAD Information Notice shall be provided without regard to whether the PHA anticipates any relocation of residents in connection with the RAD conversion. The RAD Information Notice must do the following:

common areas is insufficient) and methods of delivery (e.g., certified mail, U.S. mail, or hand delivery) must be documented in the PHA's or Project Owner's files.

- Provide a general description of the conversion transaction (e.g., the Converting Project, whether the PHA anticipates any new construction or transfer of assistance, whether the PHA anticipates partnering with a developer or other entity to implement the transaction);
- Inform the resident that the early conceptual plans are likely to change as the PHA gathers more information, including, among other items, resident opinions, analysis of the capital needs of the property and financing options;
- Inform the resident that the household has a right to remain in the unit or, if any relocation is required, a right to return to an assisted unit in the Covered Project (which may be at the new site in the case of a transfer of assistance);
- Inform the resident that they will not be subject to any rescreening as a result of the conversion;
- Inform the resident that the household cannot be required to move permanently without the resident's consent, except in the case of a transfer of assistance when the resident may be required to move a reasonable distance, as determined by HUD, in order to follow the assisted unit;
- Inform the resident that if any relocation is involved in the transaction, the resident is entitled to relocation protections under the requirements of the RAD program and, in some circumstances, the requirements of the URA, which protections may include advance written notice of any move, advisory services, payment(s) and other assistance as applicable to the situation;
- Inform the resident that any resident-initiated move from the Converting Project could put any future relocation payment(s) and assistance at risk and instruct the resident not to move from the Converting Project; and
- Inform the resident that the RAD transaction will be completed consistent with fair housing and civil rights requirements, and provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

B) General Information Notice (49 C.F.R. § 24.203(a))

The purpose of the General Information Notice (GIN) is to provide information about URA protections to individuals who may be displaced as a result of federally-assisted projects involving acquisition, rehabilitation or demolition. A GIN provides a general description of the project, the activities planned, and the relocation assistance that may become available.

A GIN shall be provided to any person scheduled to be displaced *as soon as feasible* based on the facts of the situation. In certain instances, such as when the PHA knows that a project will involve acquisition, rehabilitation or demolition, "as soon as feasible" may be simultaneous with issuance of the RAD Information Notice. For any RAD conversion involving acquisition, rehabilitation or demolition, "as soon as feasible" shall be no later than 30 days following the issuance of the CHAP. In instances where acquisition, rehabilitation or demolition is not anticipated at the time of the CHAP but project plans change to include such activities, pursuant to this Notice the PHA shall provide the GIN as soon as feasible following the change in project plans.

For RAD, the GIN 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, if he or she qualifies for relocation assistance as a displaced person under the URA, 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 displaced 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 90 days advance written notice;
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, 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 C.F.R. § 24.208(h) for additional information);
- Describe the resident's right to appeal the PHA's determination as to a resident's eligibility for URA assistance; and
- Inform the resident that the RAD transaction will be completed consistent with fair housing and civil rights requirements, and provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

Because of the potential confusion caused by evolving policy directions in the RAD program regarding delivery of the GIN, for actions taken prior to the issuance of this Notice, HUD will consider the facts and circumstances of each conversion, with emphasis on the underlying URA requirements, in monitoring and enforcing a PHA's compliance with this requirement.

C) Notice of Intent to Acquire (49 C.F.R. § 24.203(d))

For conversions involving acquisition, the Project Owner (the "acquiring agency") may provide to residents of the Converting Project a Notice of Intent to Acquire (NOIA).[80] The NOIA may be provided no earlier than 90 days prior to the PHA's reasonable estimate of the date of submission of a complete Financing Plan. While eligibility for URA relocation assistance is generally effective on the effective date of the RCC (the ION date), a prior issuance of a NOIA establishes a resident's eligibility for relocation assistance and payments on the date of issuance of the NOIA and prior to the ION date.

D) RAD Notice of Relocation

If a resident will be relocated to facilitate the RAD conversion, the PHA shall provide written notice of such relocation by means of a RAD Notice of Relocation. The RAD Notice of

[80] Acquisition includes a new ownership entity's purchase of the Covered Project from the PHA, such as a purchase by a single purpose entity, an affiliate or a low-income housing tax credit ownership entity.

Relocation may not be issued until: 1) the effective date of the RCC (the ION date) if the conversion does not involve acquisition; or 2) the earlier of the issuance of the Notice of Intent to Acquire (see Section 6.6(C)) or the effective date of the RCC (the ION date) if the conversion involves acquisition. Prior to issuance of the RAD Notice of Relocation, PHAs and Project Owners should meet with each resident household to provide preliminary relocation advisory services and to determine their needs and preferences.[81]

A RAD Notice of Relocation is not required for residents who will not be relocated. As a best practice, PHAs or Project Owners should notify residents that they are not being relocated once that determination has been made if they were previously informed by the GIN and/or by other methods that relocation was a possibility.[82]

A RAD Notice of Relocation shall provide either: 1) 30-days' notice to residents who will be relocated for twelve months or less; or 2) 90-days' notice to residents who will be relocated for more than twelve months.[83] The RAD Notice of Relocation must conform to the following requirements:

(1) The notice must state the anticipated duration of the resident's relocation.

(2) The notice must specify which entity (the PHA or the Project Owner) is primarily responsible for management of the resident's relocation and for compliance with the relocation obligations during different periods of time (i.e., before vs. after Closing).

(3) For residents who will be relocated for twelve months or less:

- The PHA or Project Owner must provide this notice a minimum of 30 days prior to relocation.[84] PHAs or Project Owners may deem it appropriate to provide longer notice periods for persons who will be temporarily relocated

[81] PHAs and Project Owners should note the URA relocation advisory services requirement for personal interviews. *See* Section 6.7 of this Notice. In sequencing the RAD Notice of Relocation, PHAs and Project Owners wishing to offer alternative housing options pursuant to Section 6.10 should also note the additional complexity in the timeline of notices. Pursuant to Section 6.10(D), the resident can consent to an alternative housing option only after issuance of the NOIA or the effective date of the RCC and 30 days after presentation of the alternative housing options. In some cases, for example, when the resident would not otherwise be relocated for over twelve months, the RAD Notice of Relocation must include both the information described in Section 6.6(D)(3) and the information in Section 6.6(D)(4). The PHA or Project Owner should consider discussing the alternative housing options prior to issuing the RAD Notice of Relocation so that the RAD Notice of Relocation can be tailored to the resident's situation.

[82] The RAD program does not require a "notice of non-displacement," which HUD relocation policy generally uses for this purpose.

[83] The 90-day notice is required for residents relocated for more than twelve months, whether or not they intend to return to the Covered Project and whether or not they are eligible for assistance and payments as a displaced person under URA. Recipients of the 90-day notice would include those residents who have voluntarily accepted a permanent relocation option as well as those residents who are relocated within the same building or complex of buildings.

[84] Note that residents may elect to move to the relocation housing before the 30 days have elapsed. However, a PHA may not require a resident to move prior to this time.

for an extended period of time (over 6 months), or if necessary due to personal needs or circumstances.

- The notice must explain that the PHA or Project Owner will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with any temporary move (including, but not limited to, increased housing costs and moving costs).
- The notice must explain the reasonable terms and conditions under which the resident may exercise the right to return to lease and occupy a unit in the Covered Project.

(4) For residents who will be relocated for more than twelve months, including for residents who may wish to voluntarily accept a permanent relocation option:

- The PHA or Project Owner must provide this notice a minimum of 90 days prior to relocation of residents.[85]
- The notice must offer the choice to be temporarily relocated, thereby preserving the resident's right to return, or the choice to be voluntarily permanently relocated pursuant to the procedures set forth in Section 6.10, together with guidance that the resident has at least thirty (30) days to consider the choice.
- For residents who voluntarily elect to be permanently relocated, the 90-day notice period may only begin once the PHA or Project Owner has made available at least one comparable replacement dwelling consistent with 49 C.F.R. § 24.204(a).[86]
- 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 comply with all requirements for a URA Notice of Relocation Eligibility as described in 49 C.F.R. § 24.203(b).

(5) The notice must inform the resident that the relocation will be completed consistent with fair housing and civil rights requirements, and it must provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

For short-term relocations, the RAD Notice of Relocation may also contain the information required in the Notice of Return to the Covered Project (see Section 6.6(F)).

[85] Note that residents may elect to move to the relocation housing before the 90 days have elapsed. However, a PHA may not compel a resident to move prior to this time.
[86] 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.

E) URA Notice of Relocation Eligibility – for residents whose temporary relocation exceeds one year (49 C.F.R. § 24.203(b))

After a resident has been temporarily relocated for one year, notwithstanding a prior issuance of a RAD Notice of Relocation, the PHA or Project Owner must provide an additional notice: the notice of relocation eligibility in accordance with URA requirements ("URA Notice of Relocation Eligibility"). The URA Notice of Relocation Eligibility is not required if the resident has already accepted permanent relocation assistance.[87]

The URA Notice of Relocation Eligibility must conform to URA requirements as set forth in 49 C.F.R. part 24 and shall:

- Provide current information as to when it is anticipated that the resident will be able to return to the Covered Project.
- Give the resident the choice to remain temporarily relocated based upon the updated information or to accept permanent URA relocation assistance at that time instead of exercising the right to return at a later time.

If the resident chooses to accept permanent URA relocation assistance and this choice requires the resident to move out of their temporary relocation housing, the URA requires that the PHA or Project Owner make available at least one, and when possible, three or more comparable replacement dwellings pursuant to 49 C.F.R. § 24.204(a), which comparability analysis is in reference to the resident's original unit. The URA further requires that the resident receive 90 days' advance written notice of the earliest date they will be required to move pursuant to 49 C.F.R. § 24.203(c).

[87] To illustrate, consider the following examples.

- Example 1: The household is expected to be relocated for 11 months. The resident would receive a RAD Notice of Relocation offering only temporary relocation. Construction delays result in the extension of the relocation such that, in fact, it exceeds 12 months. When the temporary relocation exceeds 12 months, the resident must receive a URA Notice of Relocation Eligibility offering a choice between continuation in temporary relocation status and permanent relocation.
- Example 2: The household is expected to be relocated for 14 months. The resident would receive a RAD Notice of Relocation offering a choice between temporary relocation status and permanent relocation. If the household elects <u>temporary</u> relocation, the URA Notice of Relocation Eligibility is required as an additional notice following twelve months in temporary relocation status.
- Example 3: The household is expected to be relocated for 14 months. The resident would receive a RAD Notice of Relocation offering a choice between temporary relocation status and permanent relocation. If the household elects <u>permanent</u> relocation, the URA Notice of Relocation Eligibility is not required.
- Example 4: The household can be accommodated with temporary relocation of 3 months, but has been offered and seeks to accept permanent relocation pursuant to an alternative housing option. This resident would receive a RAD Notice of Relocation under Section 6.6(D)(4) offering a choice between temporary relocation status (the default option) and permanent relocation (the alternative housing option), instead of the RAD Notice of Relocation under Section 6.6(D)(3) which would be expected absent a permanent relocation option. The URA Notice of Relocation Eligibility is not required in either case because a temporary relocation exceeding 12 months was never anticipated nor experienced.

F) Notification of Return to the Covered Project

With respect to all temporary relocations, the PHA or Project Owner must notify the resident in writing reasonably in advance of the resident's expected return to the Covered Project, informing the resident of:

- The entity (the PHA or the Project Owner) with primary responsibility for managing the resident's relocation;
- The address of the resident's assigned unit in the Covered Project and, if different from the resident's original unit, information regarding the size and amenities of the unit;
- The date of the resident's return to the Covered Project or, if the precise date is not available, a reasonable estimate of the date which shall be supplemented with reasonable additional notice providing the precise date;
- That the PHA or Project Owner will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with the return relocation; and
- The resident's options and the implications of those options if the resident determines that he or she does not want to return to the Covered Project and wants to decline the right of return.[88]

Reasonable advance notice shall be 15% of the duration of the resident's temporary relocation or 90 days, whichever is less. For short-term relocations, the PHA or Project Owner may include this information within the RAD Notice of Relocation.

6.7. Relocation Advisory Services

Throughout the relocation planning process, the PHA and Project Owner should be in communication with the residents regarding the evolving plans for relocation. Notwithstanding this best practice, certain relocation advisory services, described below, are required by the URA.

The URA regulations require the PHA or Project Owner to carry out a relocation assistance advisory program that includes specific services determined to be appropriate to residential or nonresidential displacements. The specific advisory services to be provided, as determined to be appropriate, are outlined at 49 C.F.R. § 24.205(c). For residential displacement under the URA, a personal interview is required for each displaced resident household to determine the relocation needs and preferences of each resident to be displaced. The resident household shall be provided an explanation of the relocation payments and other assistance for which the resident may be eligible, the related eligibility requirements, and the procedures for obtaining such assistance. Advisory counseling must also inform residents of their fair housing rights and be carried out in

[88] If the resident declines to return to the Covered Project upon completion of the period of temporary relocation, the resident shall be considered to have voluntarily moved out of the property, without the benefit of further relocation assistance. For example, a PHA or Project Owner may have rented a market-rate apartment as a temporary relocation resource for a six-month period. In such a situation, the resident may decline to return to the Covered Project and choose to remain in the market-rate apartment at the expiration of the six-month period, but shall not be eligible for any further relocation assistance and payments (including rent differential payments) under this Notice, the URA or Section 104(d), if applicable, in connection with the resident's decision to remain in the temporary housing and not return to the Covered Project.

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 C.F.R. § 24.205(c)(1)).[89] Such advisory services under the URA may include counseling to ensure that residents affected by the project understand their rights and responsibilities and the assistance available to them (49 C.F.R. § 24.205(c)). In addition, the PHA or Project Owner 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.

6.8. Initiation of Relocation

PHAs and Project Owners **may not initiate any involuntary physical relocation until both the RCC is in effect and the applicable RAD Notice of Relocation period has expired** (i.e., after either 30 or 90 days' notice as applicable depending on nature of the relocation, as described above). This prohibition applies to all types of RAD transactions, regardless of whether the RAD Notice of Relocation is provided after issuance of a NOIA (for conversions involving acquisition) or following the effective date of the RCC (for all other conversions). PHAs are advised to account for the required 30-day or 90-day written notice periods in their planning process, to ensure that notices which satisfy all applicable requirements are issued prior to taking any action to initiate relocation.

Neither involuntary nor voluntary relocation for the project shall take place prior to the effective date of the RCC, unless moves are authorized under Section 7, below ("Applicability of HCV and Public Housing Requirements") or unless HUD provides explicit approval which will only be provided in extraordinary circumstances. The PHA must wait until the RAD Notice of Relocation period has expired before it may initiate any involuntary relocation. However, a resident may request to move voluntarily, and the PHA may honor a resident's request to move, before the applicable 30-day or 90-day period has elapsed, provided that the PHA may not take any action to encourage or coerce a resident to make such a request. If a resident has elected an alternative housing option, PHAs are advised to ensure that any consent to voluntary permanent relocation does not expire prior to the date of the relocation, as described in Section 6.10.

HUD may use administrative data to identify and investigate projects where relocation may be occurring prior to RCC.

6.9. Records and Documentation; Resident Log

HUD may request from the PHA or Project Owner written records and documentation in order to evidence the PHA's and/or Project Owner's compliance, as applicable, with this Notice and the URA.[90] HUD may request to review some or all of such records in the event of compliance

[89] For example, under fair housing and civil rights laws, the PHA and Project Owner may be required to inform residents about and provide reasonable accommodations for individuals with disabilities, such as search assistance; take appropriate steps to ensure effective communication with individuals with disabilities, such as through the provision of auxiliary aids and services, such as interpreters and alternate format documents; provide advisory counseling services in accessible locations and in an accessible manner for individuals with disabilities; and take reasonable steps to ensure meaningful access for LEP persons. See Section 4 of this Notice for more information on these requirements.

[90] Chapter 6 of HUD Handbook 1378 includes guidance on URA recordkeeping requirements.

concerns, in the event a project is identified for additional review based on administrative data, in the event of audits for purposes of monitoring the RAD program as a whole, upon selection of a random sample of projects and/or at other times at HUD's sole discretion. The records shall include resident files for all households relocated in connection with RAD and a resident log as described in this Section.

As part of such written record, the PHA or Project Owner must maintain data sufficient to deliver to HUD a resident log of every household that resides at the Converting Project at the time of the first required resident meeting on the proposed conversion pursuant to Section 1.8 of the RAD Notice (the "First Resident Meeting") and of every household that moves into the Converting Project after the First Resident Meeting and before the conversion of assistance under RAD. If any relocation is required, the log shall track resident status through completion of rehabilitation and construction, including re-occupancy after relocation. The resident log must include, but need not be limited to, the following information:

- Name of head of household
- PHA's resident identification number and/or the last four digits of the head-of-household's Social Security Number
- The head of household's race and ethnicity as reported on the HUD Form 50058 or the HUD Form 50058 MTW (the "Form 50058"). For purposes of the resident log, all references to the Form 50058 shall be to the form most recently prepared at the time of the First Resident Meeting or, for residents who moved in after the First Resident Meeting, the form most prepared at the time of the resident's initial occupancy.
- A Yes/No indication if there is any household member reported as having a disability on the Form 50058.
- A Yes/No indication if there is any household member reported as under the age of 18 on the effective date of action of the Form 50058;
- The household's relevant unit address, unit size and household size at the following times:
    - The time of the First Resident Meeting or the time of a resident's initial occupancy if after the First Resident Meeting
    - The time of the issuance of the CHAP or the time of a resident's initial occupancy if after the issuance of the CHAP
    - Proximate and prior to the PHA or Project Owner having authority to initiate involuntary relocation activities (i.e., at the time of issuance of the RCC unless otherwise approved by HUD upon extraordinary circumstances)
    - Completion of the relocation process following construction or rehabilitation and with return of all households exercising the right of return
- The household's residence status at the time of issuance of the RCC (e.g., in residence at the Converting Project, transferred to other public housing, moved out, evicted or other with explanation)
- The household's residence status upon completion of re-occupancy (e.g., in residence at the Covered Project/never relocated, in residence at the Covered Project/temporarily relocated and returned, transferred to other public housing, moved out, evicted, permanently relocated or other with explanation)
- The following dates for each resident household, as applicable:
    - Date of the RAD Information Notice

    - Date of the GIN
    - Date of the CHAP
    - Date of NOIA
    - Date of RAD Notice of Relocation
    - Date of URA Notice of Relocation Eligibility
    - Date of most recent consent to voluntary permanent relocation[91]
    - Date of relocation away from the Converting Project or Covered Project
    - Dates of any intermediate relocation moves
    - Date of return to the Covered Project or to the household's post-closing permanent address.[92]
- The following information for each resident household, as applicable:
    - The type of move (e.g., the types identified in Section 6.4, above)
    - The form of any temporary relocation housing (e.g., hotel, assisted housing, market-rate housing)
    - The address and unit size of any temporary relocation housing
    - Whether alternative housing options were offered consistent with Section 6.10, below
    - Any material terms of any selected alternative housing options
    - The type and amount of any payments for
        - Moving expenses to residents and to third parties
        - Residents' out-of-pocket expenses
        - Rent differential payments or other payments for temporary or permanent rental assistance, together with the rent and utilities (if applicable) that were the basis for the calculations
        - Any other relocation-related compensation or assistance

6.10. Alternative Housing Options

Under the RAD Notice, "involuntary permanent relocation" is prohibited and each resident must be able to exercise his or her right of return to the Covered Project. A PHA or Project Owner is permitted to offer a resident alternative housing options when a resident is considering his or her future housing plans, provided that at all times prior to the resident's decision, the PHA and Project Owner preserve the resident's ability to exercise his or her right of return to the Covered Project.

A) Requirements for Any Offer of Alternative Housing Options

All residents who are similarly situated must be given the same offer of alternative housing options. If the PHA or Project Owner seeks to limit the number of households that accept the

[91] The most recent consent must be within 180 days of the actual relocation date, as discussed in Section 6.10(D).
[92] In the case of voluntary permanent relocation, the date of "return" may be the same as the date of relocation away from the Converting Project.

offer of alternative housing options, the PHA or Project Owner shall determine a fair and reasonable method for selection among similarly situated residents.[93]

In connection with any offer and acceptance of alternative housing options, the PHA or Project Owner must ensure that the residents' decisions are: 1) fully informed; 2) voluntary; and 3) carefully documented. Any alternative housing option must include, at a minimum, all relocation assistance and payments required under this Notice, the URA and Section 104(d), as applicable, and may include other elements. Funds administered by HUD may not be used to pay any monetary elements not required under this Notice, the URA or Section 104(d).

Acceptance of an alternative housing option is considered voluntary permanent relocation and the accompanying RAD relocation assistance and payments for which the resident may be eligible must be administered in accordance with all requirements for an eligible displaced person under the URA and its implementing regulations and, where applicable, Section 104(d) and its implementing regulations.

PHAs may not propose or request that a displaced person waive rights or entitlements to relocation assistance under the URA or Section 104(d). The PHA must provide a written notice of URA or Section 104(d) relocation assistance and payments for which the resident may be eligible so that the resident may make an informed housing choice. The resident must be provided at least thirty (30) days to consider the offer of voluntary permanent relocation and the resident's acceptance of the PHA's offer of voluntary permanent relocation must be in writing signed by the head of the household for that unit.

B) Assisted Housing Options as Alternatives

Alternative housing option packages may include a variety of housing options and PHAs and Project Owners shall take particular care to ensure program compliance with the regulations applicable to the alternative housing options. Examples of alternative housing options may include:

- Transfers to public housing
- Admission to other affordable housing properties subject to the program rules applicable to such properties
- Housing Choice Vouchers (HCVs) subject to standard HCV program administration requirements. PHAs must operate their HCV programs, including any HCVs offered as an alternative housing option, in accordance with their approved policies as documented in their Section 8 Administrative Plan and HUD regulations at 24 C.F.R. part 982. Any offer of an HCV as an alternative housing option must be made consistent with the

[93] For example, if the RAD conversion is financed by LIHTC and a few residents would not meet LIHTC program requirements, the PHA and Project Owner may want to offer these household alternative voluntary permanent relocation options. However, they must offer the same alternative housing options to all such households. As a second example, if the PHA and Project Owner seek to create two on-site vacancies of a particular unit size in order to facilitate temporary relocation on-site, the PHA may offer an alternative housing option of a housing choice voucher to all residents of applicably sized units (assuming that to do so is consistent with the PHA's voucher administration policies), and conduct a lottery to select the two households which will receive the vouchers.

PHA's admission preferences and other applicable policies and procedures set forth in the Section 8 Administrative Plan.
- Homeownership programs subject to the applicable program rules
- Other options as may be identified by the PHA and/or Project Owner

C) Monetary Elements Associated With Alternative Housing Options

A PHA or a Project Owner may include a monetary element in an alternative housing option package, provided that:

- Any monetary element associated with the alternative housing option shall be completely distinct from and in addition to any required RAD, URA or Section 104(d) relocation payments and benefits for which the resident is eligible ("Required Relocation Payments").
- No funds administered by HUD may be used to pay for any monetary element associated with the alternative housing option other than Required Relocation Payments.
- Any monetary element associated with the alternative housing option other than Required Relocation Payments must be the same amount offered to all similarly situated households.[94]
- Any alternative housing option package must comply fully with the disclosure and agreement provisions of this Notice.

D) Disclosure and Agreement to Alternative Housing Options

In providing an offer of alternative housing options to a resident, the PHA or Project Owner must inform the resident in writing of: a) his or her right to return;[95] b) his or her right to comment on and/or object to plans which would preclude the resident from returning to the Covered Project; c) the requirement that if the resident objects to such plans, the PHA or Project Owner must alter the project plans to accommodate the resident in the Covered Project; and d) a description of both the housing option(s) and benefits associated with the right of return and the alternative housing options and benefits being offered. In the description of the available housing options and benefits, the PHA or Project Owner shall include a description of any temporary housing options associated exercising the right of return and a description of any permanent alternative housing options as well as a reasonable estimate of the financial implications of all temporary and permanent options on the resident long-term.

[94] Monetary payments other than Required Relocation Payments are considered "temporary, nonrecurring or sporadic income" pursuant to 24 C.F.R. § 5.609(c)(9) and consequently are excluded from income for purposes of eligibility and assistance calculations under certain HUD programs. Residents should be reminded that monetary payments other than URA relocation payments may be taxable under the Internal Revenue Code, that monetary payments, including required relocation payments, may affect residents' eligibility for other assistance programs and that the resident should seek knowledgeable guidance on these matters, including guidance on the taxation of monetary payments under state law.

[95] In the case of a transfer of assistance to a new site a significant distance from the Converting Project as described in Section 6.4(E), the resident shall be informed of the resident's right to return to the Covered Project at the new site and of the resident's right to an assisted unit within a reasonable distance of the site of the Converting Project, as described in Section 6.4(E).

The written notification may request written consent from the resident to exercise the alternative housing option and receive permanent relocation assistance and payments pursuant to RAD, the URA and/or Section 104(d), as applicable, in addition to any benefits associated with the alternative housing option. As part of any voluntary consent, the resident head of household must acknowledge in writing that acceptance of such assistance terminates the resident's right to return to the Covered Project. In order to ensure that the resident has sufficient time to seek advice and consider the alternative housing options, any consent to an alternative housing option executed within 30 days of the written presentation of the options shall be invalid.

Any offer of alternative housing options must be made in writing and the acceptance of the alternative must be voluntary and in writing. The offer of an alternative housing option must contain the following elements:

- The resident is informed of his or her right to return to the Covered Project and that neither the PHA nor the Project Owner can compel the resident to relinquish his or her right to return. The offer of alternative housing options must clearly state that acceptance of any alternative would relinquish the resident's right to return to the Covered Project.
- The offer of an alternative housing option must be accompanied by identification of comparable housing units which the resident may use to understand the nature of housing options available to them and the rent and estimated utility costs associated with such housing options. This information must also be accompanied by a reasonable estimate of any replacement housing payment or "gap payment" for which the resident may be eligible.
- The offer of an alternative housing option must be accompanied by information regarding moving payments and assistance that would be available if the resident exercises the right of return and if the resident accepts the alternative housing option.
- Residents must be offered advisory assistance to consider their options.
- To be fully informed, the offer must outline the implications and benefits of each alternative housing option being made available (i.e., of accepting each alternative housing option as compared to exercising his or her right to return) as well as a reasonable estimate of when the resident's relocation might occur. Implications and benefits include payment amounts, differences in rent calculations, differences in program rules, housing location, and potential long-term implications such as household housing expenses multiple years in the future.
- To be fully voluntary, the resident must have at least thirty (30) days following delivery of the written offer to consider their options. LEP persons must be provided a written translation of the offer and oral interpretation of any meetings or counseling in the appropriate language. In addition, PHAs must comply with their obligation to ensure effective communication with persons with disabilities.
- The resident cannot be asked to make a decision which will be implemented at a distant future time. Consequently, the resident may not provide written consent to an alternative housing option (and consequently, consent to voluntary permanent relocation) until after

the earlier of issuance of the NOIA or the effective date of the RCC.[96] If a resident signs a written consent to accept an alternative housing option, that written consent is valid for 180 days. If relocation (after the applicable notice periods) has not occurred within this 180 day period, then the PHA or Project Owner must secure a new consent to accept an alternative housing option. New relocation notices are generally not required.

- The acceptance must be in writing signed by the resident head of household, including a certification of facts to document that the household is relinquishing its right to return and that the decision and the acceptance of the alternative housing option was fully informed and voluntary.
- Residents accepting alternative housing options to relinquish their right to return will be considered to have voluntarily and permanently relocated. Such residents are to be provided applicable RAD, URA and/or Section 104(d) relocation assistance and payments.

The information included with the offer of alternative housing options is to aid the resident in making decisions regarding the desirability of the alternative housing options and neither satisfies nor replaces the relocation notices and information required to be provided to residents pursuant to this Notice, the URA or Section 104(d).

While HUD does not require PHAs to submit documentation of alternative housing options offered to residents or the residents' elections, PHAs must keep auditable written records of such consultation and decisions. HUD may request this documentation at any time, including as part of a review of the Checklist or if relocation concerns arise.

6.11. Lump Sum Payments

PHAs and Project Owners should note that certain relocation payments to displaced residential tenants may be subject to 42 USC § 3537c ("Prohibition of Lump-Sum Payments") and must be disbursed in installments. The PHA or Project Owner may determine the frequency of the disbursements which must be made in installments. Handbook 1378, Chapter 3-7(D) provides guidance on the manner and frequency of disbursing payments subject to this requirement.

Any monetary element beyond Required Relocation Payments which may be associated with an alternative housing option described in Section 6.10, above, is not relocation assistance and is therefore not subject to the requirements regarding lump sum payments.

SECTION 7. APPLICABILITY OF HCV AND PUBLIC HOUSING REQUIREMENTS

7.1. HCV Waiting List Administration Unrelated to the RAD Transaction

From time to time, a resident of a Converting Project may place themselves on the PHA's waiting list for HCVs independent of any planned RAD transaction. With respect to residents of a Converting Project prior to the effective date of the HAP contract, PHAs should continue to

[96] The PHA and Project Owner should note that securing resident consent to an alternative housing option may delay the issuance of the RAD Notice of Relocation. The RAD Notice of Relocation must be specific to whether the resident will be temporarily or permanently relocated.

administer their HCV waiting list in accordance with their Section 8 Administrative Plans. Residents who rise to the top of the HCV waiting list independent of any preference for relocating RAD residents or other RAD provisions and accept an HCV are not considered to be relocated as a result of the RAD conversion. Standard administration of the PHA's HCV waiting list is not considered relocation.

7.2. HCV Waiting List Administration Related to the RAD Transaction

From time to time, a PHA may wish to use HCV resources as a relocation option in connection with a RAD transaction. In order to do so, a PHA must modify its Section 8 Administrative Plan to provide a preference for relocating RAD residents and the PHA is subject to Section 6.8 of this Notice relating to initiation of relocation. Further, if a PHA provides a preference for relocating RAD residents, the PHA must be explicit regarding the nature of the HCV as a relocation resource. If the PHA anticipates using the HCV as a temporary relocation resource, the PHA must recognize that it cannot rescind an HCV once issued to the resident (i.e., the family would have to voluntarily relinquish their voucher and may choose to remain in the HCV program indefinitely). The PHA must also provide a preference for admission to the Covered Project in order to satisfy the right to return. Alternatively, if the PHA anticipates using the HCV as a voluntary permanent relocation resources, the PHA must comply with the alternative housing options provisions of Section 6.10.[97]

7.3. Public Housing Transfers Unrelated to the RAD Transaction

From time to time, a resident of a Converting Project may request a transfer to another public housing property independent of any planned RAD transaction. With respect to residents of a Converting Project prior to the effective date of the HAP contract, PHAs must continue to administer their admissions and occupancy procedures as adopted. Any prohibitions in this Notice on implementing relocation do not apply to residents requesting public housing transfers, moves pursuant to the Violence Against Women Act (VAWA)[98] or reasonable accommodation moves. Standard administration of the PHA's admissions and occupancy policy is not considered relocation.[99] Transfers not undertaken for the RAD project are not subject to URA. However, it is recommended that the PHA document the transfer carefully, including an acknowledgement by the resident that the transfer is not undertaken for the RAD project, is not

[97] PHAs and Project Owners should note that while in most cases, there is no rent differential between the tenant paid rent in a public housing unit and in an HCV, there are some situations (such as flat rent households) where a difference does exist. Rental assistance payments under the URA are required if there is a difference between these two amounts.

[98] Title IV, section 40001-40703.

[99] Standard administration of the PHA's admissions and occupancy policy is permitted. However, HUD is sensitive to concerns that discussion of the planned RAD conversion and construction activities may cause residents to perceive a pressure to transfer without the counseling and moving assistance which would be available were the household to wait until relocation. If relocation at the Converting Project is planned, PHAs are strongly advised to document any such transfers carefully and to provide any households moving under standard admissions and occupancy policies with additional notices referencing the assistance and payments which would be available if the household were to remain in place until the relocation plan is implemented.

subject to URA requirements and that the resident is moving notwithstanding the guidance in the GIN or other relocation guidance from the PHA.

7.4. Resident Initiated Public Housing Transfers Related to the RAD Transaction

Pursuant to Section 1.8 of the RAD Notice, households in the Converting Project who do not want to transition to the Section 8 program may be offered, if available, the opportunity to move to other public housing owned by the PHA. Such move shall be implemented as a transfer and shall be prioritized equivalent to a "demolition, disposition, revitalization or rehabilitation transfer" as described in Section 11.2 of the applicable Public Housing Occupancy Guidebook. Transfers for this purpose do not require any modification to the PHA's admissions and occupancy policy and may occur at any time pursuant to the PHA's admissions and occupancy policy. Transfers for this purpose, while initiated by the resident, are the result of the PHA-initiated RAD transaction and the PHA must bear the reasonable costs of transfer. The reasonable cost of the transfer includes not just the cost of packing, moving, and unloading, but also the cost of disconnecting and reconnecting any existing resident-paid services such as telephone and cable television. The PHA must also document that the resident's transfer request is fully informed and fully voluntary, which documentation must include an acknowledgement by the resident that the transfer is not undertaken at the request of the PHA or under pressure from the PHA, that the resident is moving notwithstanding the guidance in the GIN or other relocation guidance from the PHA and that the resident is withdrawing from participation in the RAD program and consequently losing rights, including the right to return, which accrue to residents participating in the RAD program. A public housing resident who voluntarily seeks a public housing transfer is generally not considered to be displaced under the URA or Section 104(d), where applicable.

7.5. Public Housing as a Temporary Relocation Resource

PHAs and Project Owners may wish to mitigate the relocation budget associated with the RAD conversion by using units within the PHA's portfolio as relocation resources. In light of its mission to serve as many low-income households as possible, including its need to accommodate emergency transfers (such as moves pursuant to VAWA), the PHA should minimize the use of the public housing units not converting under RAD for temporary relocation of RAD impacted residents. HUD has a strong preference that the PHA use the units within the PHA's Converting Projects as a temporary relocation resource prior to using units in the remainder of the PHA's public housing portfolio. PHAs may elect not to lease units within the Converting Projects or, if necessary, the remainder of its portfolio, for this purpose <u>only to the extent reasonably necessary</u> to facilitate construction or rehabilitation.

Upon the effective date of the HAP contract (usually also the effective date of the RAD conversion), each resident of a Covered Project becomes a participant in the Section 8 program and is no longer part of the public housing program. A PHA may use public housing as a temporary relocation resource if approved by HUD, which approval shall depend on the proposed structure. PHAs wishing to use public housing units as a temporary relocation resource must consult with HUD's Office of Public and Indian Housing (PIH) prior to the formal request for HUD approval. It is unlikely that HUD would approve a request to use public housing units

as a relocation resource for a period exceeding one year after the effective date of the HAP contract.

If HUD grants approval, HUD shall provide alternative requirements regarding PIH Information Center (PIC) documentation of the occupancy of these temporary relocation resources. PHAs must follow any guidance or instructions regarding treatment of the public housing units in HUD's data systems as may be provided from time to time.

PHAs and Project Owners should note that, absent written approval, if a resident seeks to occupy a public housing unit after the effective date of the HAP contract, the resident would need to be readmitted to public housing in a manner consistent with the waitlist and admissions policies and must exit the Section 8 program.

7.6. Terminations (Including Evictions) and End of Participation Unrelated to the RAD Transaction

Public housing program requirements related to continued occupancy and termination, including rules on grievances and related hearings, remain in effect until the effective date of a new PBV or PBRA HAP contract. If a resident is evicted in accordance with applicable state and local law and the eviction is not undertaken for the purpose of evading the obligation to make available RAD relocation and URA payments and other assistance, the resident is generally not entitled to relocation assistance and payments under this Notice or the URA (49 C.F.R. § 24.206). If a resident voluntarily ends his or her participation in the public housing program, in the absence of evidence that the end of participation was induced by the PHA for the purpose of evading the obligation to make available RAD relocation and URA payments and other assistance, the resident is generally not entitled to relocation assistance and payments under this Notice or the URA.

7.7. Right-Sizing

Public housing, PBV and PBRA requirements mandate that, upon the availability of a unit which is appropriate for the household size, the PHA or Project Owner must transfer a household that is under- or over-housed into the unit appropriate to the household's size. However, accommodating all residents pursuant to the right of return has primacy over right-sizing requirements and may, in some cases, require temporarily over-housing households. In such circumstances, the PHA or Project Owner shall subsequently transfer the household to an appropriate size unit when available, as is required by the applicable program regulation. Such actions shall be governed by the applicable program regulation and shall not be considered relocation under this Notice.

Lourdes Castro-Ramirez
Principal Deputy Assistant Secretary for
Public and Indian Housing

Edward L. Golding
Principal Deputy Assistant Secretary for
Housing

APPENDIX I: Applicable Legal Authorities

APPENDIX II: Recommended Relocation Plan Contents

APPENDIX I: Applicable Legal Authorities

Part 1

This Appendix to the Notice identifies key legal authorities with respect to fair housing, civil rights, and resident relocation. This Appendix is not exhaustive of applicable legal authorities, which authorities may also include other Federal statutes, regulations and Executive Orders, and civil rights provisions related to other programs (including funding programs) associated with the RAD transaction.

Fair Housing Act (Title VIII of the Civil Rights Act of 1968, as amended)

The Fair Housing Act, 42 U.S.C. § 3601 et seq., and its implementing regulations, 24 C.F.R. part 100, prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, disability, or familial status. The Fair Housing Act applies to for-sale and rental housing, whether the housing is privately or publicly funded, including housing supported by tax credits. Single family homes, condominiums, apartment buildings, time-shares, dormitories, transitional housing, homeless shelters that are used as a residence, student housing, assisted living housing, and other types of housing are all covered by the Fair Housing Act.

Among its substantive provisions, the Fair Housing Act requires "covered multifamily dwellings," designed and constructed for first occupancy after March 13, 1991, to be readily accessible to and usable by persons with disabilities. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas are subject to the Act's design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas are subject to the Act's design and construction requirements.[100] In addition, the Fair Housing Act requires that housing providers make reasonable accommodations in rules, policies, and services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit, including public and common use areas, and that housing providers permit reasonable modifications of existing premises for persons with disabilities.

The Fair Housing Act also requires HUD to administer HUD programs and activities in a manner that affirmatively furthers fair housing (42 U.S.C. § 3608(e)(5). HUD's affirmatively furthering fair housing ("AFFH") rule in 24 C.F.R. §§ 5.150-5.180 will apply to PHAs (except for qualified PHAs) for the PHA's fiscal year that begins on or after January 1, 2018 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5. The affirmatively furthering fair housing regulations will apply to qualified PHAs, for the PHA's fiscal year that begins on or after January 1, 2019 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5.[101]

[100] *See* 42 U.S.C. § 3604(f)(3)(c) and 24 C.F.R. § 100.205.

[101] For purposes of the AFFH rule, "[a]ffirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing under the AFFH rule means taking meaningful actions that, taken together, address

Additional detail and discussion of the interplay between the Fair Housing Act, Section 504, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

United States Housing Act of 1937 (1937 Act)

The United States Housing Act of 1937 (1937 Act) (42 U.S.C. § 1437c-1(d)(15)) requires PHAs to submit a 5-year plan and an Annual Plan. Pursuant to HUD regulations, the Annual Plan includes a certification by the PHA that the PHA will affirmatively further fair housing.

Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*) and HUD's implementing regulation (24 C.F.R. part 1) prohibit recipients of Federal financial assistance from discriminating, excluding from participation, or denying benefits to, any person on the basis of race, color, or national origin. In addition, Title VI regulations prohibit HUD recipients of Federal financial assistance from utilizing criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin (24 C.F.R. § 1.4(b)(2)(i)). When determining the site or location of housing, recipients may not make selections with the purpose or effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination on the ground of race, color, or national origin (24 C.F.R. § 1.4(b)(3)). An applicant or recipient of HUD financial assistance also has an obligation to take reasonable action to remove or overcome the consequences of prior discriminatory practices regardless of whether the recipient engaged in discriminatory conduct (24 C.F.R. § 1.4(b)(6)).

Recipients of Federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities for persons who have limited ability to read, speak, or understand English – i.e., individuals who have limited English proficiency (LEP). This includes oral and written communications during relocation and throughout a RAD transaction. Such language assistance may include, but is not limited to, providing written translation of notices regarding the plans for the project and relocation and oral interpretation at meetings. Otherwise, LEP persons may be denied participation in, and the benefit of, the recipients' program or activity. On January 22, 2007, HUD issued "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (LEP Guidance), available at: http://www.lep.gov/guidance/HUD_guidance_Jan07.pdf.[102]

significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws." 24 C.F.R. § 5.150. Meaningful actions means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity. See 24 C.F.R. § 5.152.

[102] *See also* Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, which requires recipients of Federal financial assistance to take reasonable steps to provide meaningful access to

Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 provides: "No otherwise qualified individual with a disability in the United States … shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, service or activity receiving Federal financial assistance."[103]

Among other things, HUD's regulations implementing Section 504 (in 24 C.F.R. part 8) prohibit recipients of Federal financial assistance, in determining the site or location of a facility receiving such assistance, from making site selections the purpose or effect of which would (1) exclude qualified individuals with disabilities from or deny them the benefits of a program or activity, or otherwise subject them to discrimination; or (2) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities.[104] These prohibitions apply to both determining the site of permanent facilities and a site for relocation of residents.

Furthermore, HUD's implementing regulations prohibit discrimination, the denial of benefits, or the exclusion of participation of individuals with disabilities from the programs or activities of recipients of federal financial assistance because a recipient's facilities are inaccessible. Such recipients must provide qualified individuals with disabilities with program access, which may require modification of architectural features of facilities in RAD transactions for individuals with disabilities to have access to the program. Certain architectural specifications apply to facilities that are altered or newly constructed with HUD financial assistance, such as facilities where assistance is transferred and facilities used as temporary or permanent relocation sites for residents of a project undergoing a RAD conversion. If alterations are made to a housing facility, the alterations to dwelling units in the facility are required, to the maximum extent feasible (i.e., if doing so would not impose undue financial and administrative burdens on the operation of the project), to be made readily accessible to and usable by individuals with disabilities. If alterations taken to a development that has 15 or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility (except when it requires removal of structural load-bearing members), or if the facility is newly constructed, then a minimum of 5% of the total dwelling units, or at least one unit in a development, whichever is greater, must be made accessible for persons with mobility impairments. An additional 2% of the units, but not less than one unit, in a development must be accessible for persons with hearing and vision impairments.

In addition, regulations implementing Section 504 require recipients to make reasonable accommodations for persons with disabilities. A reasonable accommodation is a change, adaptation, or modification to a policy, program, service, or workplace which will allow a qualified person with a disability to participate fully in a program, take advantage of a service, or perform a job. Section 504 also includes effective communication requirements, such as

their programs and activities for LEP persons. E.O. 13166 directs all Federal agencies, including HUD, to issue guidance to help recipients of Federal financial assistance in providing such meaningful access to their programs.

[103] 29 U.S.C. § 794. HUD's Section 504 regulation that applies to recipients of Federal financial assistance, including PHAs and Project Owners, is located at 24 C.F.R. part 8.

[104] 24 C.F.R. § 8.4(b)(5).

providing interpreters and alternate format documents (e.g., Braille, large print, accessible electronic communications) for persons with disabilities.

Additional detail and discussion of the interplay between Section 504, the Fair Housing Act, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

Titles II and III of the Americans with Disabilities Act

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in all services, programs, and activities provided or made available by public entities. Title II of the ADA applies to housing developed or operated by state and local governments, which includes a PHA. Title III of the ADA prohibits discrimination on the basis of disability by public accommodations and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. For example, Title III applies to rental offices, sales offices, homeless shelters, hotels and motels, and commercial spaces associated with housing, such as daycare centers, social service offices, and sales and retail establishments. Titles II or III also will generally apply to community spaces and facilities, such as neighborhood networks, to computer centers (including the computers in the centers), and to transportation services and conveyances provided by PHAs and Project Owners.

Additional detail and discussion of the interplay between Titles II and III of the Americans with Disabilities Act, the Fair Housing Act, and Section 504 of the Rehabilitation Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

Section 109

Section 109 of the Housing and Community Development Act of 1974 (HCDA of 1974), Title I, prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex in Community Development Block Grant (CDBG) programs and activities. Section 109 applies to RAD projects that receive CDBG or other assistance under Title I of the HCDA of 1974.

In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 to ensure that individuals are not subjected to discrimination on the basis of race, color, national origin, disability, age, religion, or sex by recipients of CDBG funds. Section 109 charges HUD with enforcing the right of individuals to live in CDBG-funded housing and participate covered programs and activities free from such discrimination. However, this additional statutory authority only applies to programs authorized under Title I of the HCDA of 1974, such as CDBG and programs, such as Section 108 loan guarantees and the Historically Black Colleges and Universities program.

Equal Access to HUD-assisted or HUD-insured Housing

HUD requires its housing programs to be open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status. HUD recipients and subrecipients must comply with 24 C.F.R. § 5.105(a)(2) when determining eligibility for housing assisted with HUD

funds or subject to an FHA-insured mortgage, and when making such housing available. This includes making eligibility determinations and making housing available regardless of actual or perceived sexual orientation, gender identity, or marital status, and prohibiting inquiries about sexual orientation or gender identity for the purpose of making eligibility determinations or making housing available. Applicants are encouraged to become familiar with these requirements, HUD's definitions of sexual orientation and gender identity at 24 C.F.R. § 5.100, clarifications to HUD's definition of family at 24 C.F.R. § 5.403, and other regulatory changes made through HUD's Equal Access Rule, published in the Federal Register at 77 FR 5662 (Feb. 3, 2012).

Section 3: Economic Opportunities for Low- and Very Low-income Persons.

Certain HUD programs require recipients of assistance to comply with Section 3 of the Housing and Urban Development Act of 1968 (Section 3), 12 U.S.C. § 1701u (Economic Opportunities for Low- and Very Low-Income Persons in Connection with Assisted Projects), and the HUD regulations at 24 C.F.R. part 135. The regulations at 24 C.F.R. part 135 implementing Section 3 ensure, to the greatest extent feasible, that training, employment, contracting and other economic opportunities be directed to low- and very low-income persons, especially recipients of government assistance for housing, and to businesses that provide economic opportunities to low-and very low-income persons where proposed project is located. Recipients of funds covered by Section 3 must comply with 24 C.F.R. part 135, particularly subpart B-Economic Opportunities for Section 3 residents and Section 3 Business Concerns, and Subpart E-Reporting and Recordkeeping. HUD encourages recipients to search the national Section 3 Business Registry to find local businesses that prioritize hiring Section 3 residents.

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 USC § 4601 *et seq.* (URA) is a Federal law that establishes minimum standards for programs or projects receiving Federal financial assistance 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.[105] The URA implementing Federal regulations can be found at 49 C.F.R. part 24. Project-Based Voucher (PBV) and Project-Based Rental Assistance (PBRA) are considered Federal financial assistance for purposes of the URA. As a result, the URA will apply to acquisitions of real property and relocation of persons from real property that occur as a direct result of acquisition, rehabilitation or demolition for a project that involves conversion of assistance to PBV or PBRA programs under RAD.

[105] For additional guidance, see 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.

Section 104(d) of the Housing and Community Development Act of 1974

Section 104(d) of the Housing and Community Development Act of 1974, as amended, 42 USC § 5304(d), (Section 104(d)), is a Federal law that applies when a lower-income dwelling is demolished or converted (as conversion is defined in accordance with 24 C.F.R. § 42.305) to a use other than lower-income housing in connection with a Community Development Block Grant Program (CDBG) or HOME Investment Partnerships Program (HOME) funded activity. Under Section 104(d), a lower-income person is considered displaced and, therefore eligible for Section 104(d) relocation assistance if the person permanently moves from real property or permanently moves personal property from real property as a direct result of the demolition or conversion of a lower-income dwelling to a use other than lower-income dwelling unit in connection with a CDBG or HOME funded activity. The Section 104(d) one-for-one replacement housing requirements may apply with respect to occupied and vacant occupiable lower-income dwelling units that are demolished or converted to a use other than lower-income dwelling units in connection with CDBG or HOME funded activity. Section 104(d) implementing regulations can be found at 24 C.F.R. part 42, Subpart C. Additional HUD policy and guidance for Section 104(d) is available in HUD Handbook 1378, Chapter 7.

Part 2 – Accessibility Requirements

Federal accessibility requirements apply to all RAD projects – whether they include new construction, alterations, or existing facilities. Applicable laws include, but are not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, and Titles II or III of the Americans with Disabilities Act (ADA). A PHA or Project Owner must comply with each law that applies to its project and with the requirement that provides the most accessibility when two or more laws apply. All three laws include new construction requirements. Substantial alterations, additions, rehabilitation and existing facilities must be in compliance with applicable requirements of Section 504 and the ADA.[106] All three laws may also require reasonable accommodations or modifications.

Accessibility Requirements for New Construction

The Fair Housing Act requires all "covered multifamily dwellings" designed and constructed for first occupancy after March 13, 1991, to be readily accessible to and usable by persons with disabilities. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas must meet the Fair Housing Act's design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas must meet the Fair Housing Act's design and construction requirements. The Fair Housing Act requires that all covered multifamily dwellings be designed and constructed so that public and common use areas are readily accessible to and usable by persons with disabilities; all doors are sufficiently wide to allow passage by persons using wheelchairs; all units contain accessible routes into and through the dwelling unit; light switches, electrical outlets, thermostats, and other environmental controls are in accessible locations; reinforcements are installed in bathroom walls to allow later installation

[106]*See* 24 C.F.R. § 100.205 (Fair Housing Act) and 24 C.F.R. §§ 8.22 and 8.23 (Section 504). *See also* 28 C.F.R. § 35.151(b) and 28 C.F.R. part 36 (ADA Titles II and III regulations, respectively).

of grab bars; and kitchens and bathrooms are usable such that a person in a wheelchair can maneuver about the space.[107] These design and construction requirements apply whether the housing is privately or publicly funded, including housing supported by tax credits.[108]

New construction of a multifamily housing project containing five or more dwelling units is also subject to physical accessibility requirements under Section 504. Under Section 504, a "project" includes all residential and appurtenant structures, equipment, roads, walks, and parking lots which are covered by a single contract or application for Federal financial assistance, or are treated as a whole for processing purposes, whether or not they are located on a single site.[109] The accessibility standards for new construction under Section 504 are the Uniform Federal Accessibility Standards (UFAS).[110] HUD recipients may also use the 2010 ADA Standards for Accessible Design under title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice"). This option exists until HUD formally revises its Section 504 regulation to adopt an updated accessibility standard. Refer to HUD's Deeming Notice for more information.

Section 504 also requires that a minimum of 5% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with mobility impairments. An additional 2% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with vision and hearing impairments.[111] HUD may prescribe a higher percentage or number of units upon request by any affected recipient or by any State or local government or agency based upon demonstration to the reasonable satisfaction of HUD of a need for a higher percentage or number, based on census data or other available current data, or in response to evidence of a need for a higher percentage or number received in any other manner. In reviewing such request or otherwise assessing the existence of such needs, HUD shall take into account the expected needs of eligible persons with and without disabilities.[112]

Title II of the ADA prohibits discrimination on the basis of disability in all services, programs, and activities provided or made available by public entities. Title II of the ADA applies to housing programs, including housing developed or operated by state and local governments, which includes PHAs. Title III of the ADA prohibits discrimination on the basis of disability by public accommodations, including rental offices, and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. All newly constructed or altered facilities, including facilities altered to

[107] *See* 24 C.F.R. § 100.205.
[108] For more information about the design and construction provisions of the Fair Housing Act, see www.fairhousingfirst.org. See also the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Accessibility (Design and Construction) Requirements for Covered Multifamily Dwellings Under the Fair Housing Act (April 30, 2013), available at: www.hud.gov/offices/fheo/library/hudjointstatement.pdf.
[109] *See* 24 C.F.R. § 8.3.
[110] The UFAS are available at https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/ufas). *See also* 24 C.F.R. § 8.32.
[111] *See* 24 C.F.R. § 8.22.
[112] *See* HUD regulation at 24 C.F.R. § 8.22(c).

comply with program access and readily achievable barrier removal obligations that exist under Titles II or III of the ADA, must comply with the U.S. Department of Justice's ADA architectural accessibility standards as described in the following U.S. Department of Justice Technical Assistance document ADA Requirements, Effective Date/Compliance Date (Feb. 2011), http://www.ada.gov/revised_effective_dates-2010.htm.

Accessibility Requirements for Alterations

If a building was constructed for first occupancy after March 13, 1991, the building must be in compliance with, and all alterations must maintain the building's accessible features so that the building continues to meet, the Fair Housing Act's accessibility requirements. In addition, without regard to the date of construction for first occupancy, certain alterations may be required under the Fair Housing Act if requested by a resident as a reasonable accommodation or modification or otherwise required to remediate accessibility deficiencies in the design and construction of the building.

Under HUD's Section 504 regulation, alterations include any structural change in a facility or a change to its permanent fixtures or equipment. If alterations are undertaken to a project that has fifteen or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility, this qualifies as "substantial alterations," in which the new construction provisions of 24 C.F.R. § 8.22 apply.[113]

When alterations are made that do not qualify as substantial alterations, alterations to dwelling units in a multifamily housing project shall, to the maximum extent feasible, be made to be readily accessible to and usable by individuals with disabilities.[114] If alterations of single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, the entire dwelling unit shall be made accessible. Once 5% of the dwelling units in a housing project are readily accessible to and usable by individuals with mobility impairments, no additional elements of dwelling units or entire dwelling units are required to be accessible under this provision. However, alterations to meet ongoing accessibility needs are always required, for example, in response to a reasonable accommodation request. Alterations to common areas or parts of facilities that affect accessibility of existing housing facilities shall, to the maximum extent feasible, be made to be accessible to and usable by individuals with disabilities. For purposes of this paragraph, the phrase "to the maximum extent feasible" shall not be interpreted as requiring that a recipient (including a PHA) make a dwelling unit, common area, facility or element thereof accessible if doing so would impose undue financial and administrative burdens on the operation of the multifamily housing project.[115]

All altered facilities covered by Titles II or III of the ADA must be altered in accordance with the U.S. Department of Justice's 2010 ADA Standards for Accessible Design and applicable ADA

[113] *See* 24 C.F.R. § 8.23(a). The sole exception is that load bearing structural members are not required to be removed or altered.
[114] HUD may require a higher number or percentage of accessible units pursuant to 24 C.F.R. § 8.22(c) and 24 C.F.R. § 8.23(b)(2).
[115] 24 C.F.R. § 8.23(b).

regulations, unless subject to certain safe harbors identified in the 2010 ADA revised regulations for Titles II and III, as applicable.[116]

HUD will consider on a case-by-case basis a PHA's request to undertake limited new construction on the site of a Covered Project undergoing rehabilitation to comply with accessibility requirements on the site.

Additional Accessibility Requirements for Both New Construction and Alterations

Accessible units must be distributed throughout projects and sites and be available in a sufficient range of sizes and amenities so that a qualified individual with disabilities' choice of living arrangements is, as a whole, comparable to that of other persons eligible under the same program.[117] This provision shall not be construed to require provision of an elevator in any multifamily housing project solely for the purpose of permitting location of accessible units above or below the accessible grade.

PHAs are encouraged to use universal design principles, visitability principles and active design guidelines in planning new construction or retrofit work, wherever feasible. However, adherence to universal design principles does not replace compliance with the accessibility requirements of Section 504, the ADA and the Fair Housing Act.

Program Accessibility Requirements

Under Section 504, recipients must operate each existing housing program or activity receiving Federal financial assistance so that the program or activity, when viewed in its entirety, is accessible to and usable by individuals with disabilities. Title II of the ADA also includes a program access requirement, while Title III of the ADA requires readily achievable barrier removal.[118] Further, Section 504, the Fair Housing Act, and the ADA require that reasonable accommodations/modifications be granted to address disability-related needs of individuals with disabilities.[119]

[116] *See* http://www.ada.gov/regs2010/2010ADAStandards/2010ADAstandards.htm.
[117] *See* 24 C.F.R. §§ 8.26 and 8.27.
[118] *See* 28 C.F.R. § 35.150; 28 C.F.R. § 36.304.
[119] For more information on reasonable accommodations, see the HUD/DOJ Joint Statement on Reasonable Accommodations Under the Fair Housing Act at http://portal.hud.gov/hudportal/documents/huddoc?id=JOINTSTATEMENT.PDF. While this joint statement focuses on the Fair Housing Act, the principles discussed in the statement generally apply to requests for reasonable accommodation under Section 504, except, for purposes of Section 504, HUD recipients are required to provide and pay for structural modifications as a reasonable accommodation.

APPENDIX II: Recommended Relocation Plan Contents

While RAD mandates written relocation plans only for projects which involve permanent relocation (including, without limitation, a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than one year, HUD strongly encourages PHAs to document their relocation planning process and procedures in a written relocation plan. The following provides suggested content for required and recommended relocation plans. In the case of any discrepancy between this description of the recommended relocation plan contents and the provisions of the Notice to which this Appendix is attached or any applicable laws or regulations with respect to the URA or Section 104(d), the provisions of the Notice or applicable laws and regulations shall govern.

The basic elements of the relocation plan include:

- A general description of the project and project elements that may create relocation needs;
- Information on residents of the project and eligibility for relocation assistance and payments;
- Information regarding how the project will address the RAD right to return requirements and the project's re-occupancy policies;
- A detailed discussion of plans for temporary relocation assistance;
- A detailed discussion of any transfer of assistance;
- A detailed discussion of any offers of alternative housing options and plans for voluntary permanent relocation assistance;
- A detailed discussion of compliance with fair housing and civil rights requirements, including accessibility requirements;
- The relocation budget; and
- The appeals process.

The plan as a whole should discuss the specific steps to be taken to minimize the adverse impacts of relocation on the residents.

I. Project Summary

The Relocation Plan should provide a general description of the property (e.g., year built, location, number of units, configuration, resident population served). The project summary should also identify the nature of the activities to be undertaken, including acquisition, demolition, rehabilitation, and construction activities and additional detail regarding the project scope (e.g., gut rehab, systems replacement, modest in-unit renovations, transfer of assistance). The project summary should also discuss how any construction activities are to be implemented (i.e., vacate the property entirely, vacate specific floors or buildings, rehabilitation with residents in place). The summary should also discuss the overall theory of relocation, for example, whether a few households will be relocated off-site and the vacant units will be used as temporary housing before other households move back to their original units (a "hoteling" approach), or whether the vacant units will be permanently occupied, with the residents vacating other units to be renovated (a "domino" approach).

The relocation plan should also identify the funding sources which may trigger relocation requirements, with particular attention to the potential presence of HOME or CDBG funds which may trigger Section 104(d) requirements.

II. Project Occupancy

The Relocation Plan should provide information on occupancy of the property including the number of residents, their household type (family, elderly), any non-residential (commercial) occupants, and should identify how any routine needs (such as continuation of utilities such as telephone service) and civil rights compliance issues (for example, limited English proficiency, disabilities, reasonable accommodations and unit modifications that have been or may be necessary) shall be identified and addressed. The Relocation Plan may specify the community meetings, interviews and/or other processes that will be undertaken to assess the residents' needs.

The Relocation Plan should also address eligibility for relocation assistance and payments, applying the rules of the Notice to the particularities of the project.

III. Resident Return and Re-occupancy Policies

The Plan should address how the project will honor the RAD right to return requirements and the "no re-screening upon conversion" policy. With respect to residents who will be temporarily relocated, the Plan should include the methodology that will be used to determine the sequence in which residents will re-occupy units at the project after rehabilitation, demolition, and/or construction is completed, and to determine how residents are matched with units if the residents are not able to return to their original unit. For example, if units will come online in stages, the plan should outline how the PHA or Project Owner will determine when each resident will return to the property.

IV. Temporary Relocation Assistance

The plan should detail the temporary housing resources to be used, the anticipated duration of temporary relocations, notices to be provided and the temporary relocation assistance the PHA or Project Owner will provide for residents (Paragraph 2-7 of HUD Handbook 1378). Topics to be addressed in the Plan include:

- Temporary Housing Resources. The Plan should identify the nature and availability of the temporary housing resources the PHA or Project Owner anticipates using. On-site resources are generally preferred. However, in some cases, PHAs or Project Owners may need to use hotel rooms for short-term relocations, or market-rate apartments. If the PHA or Project Owner anticipates using other assisted housing resources (such as HCVs, public housing or other properties with regulatory restrictions), the PHA or Project Owner should take particular care to address regulatory issues.
- Allocation of Temporary Relocation Resources. The Plan should describe a fair and reasonable methodology for allocating temporary relocation housing to residents on a nondiscriminatory basis.
- Duration of Temporary Relocation. In the event that the Plan includes relocation which is anticipated to exceed one year, it should detail the requirements which apply to those

residents (such as the issuance of a *Notice of Relocation* to the resident covering eligibility for URA relocation assistance, the offer of permanent relocation assistance and payments at URA levels and, if conditions warrant, the subsequent issuance of a *Notice of Eligibility*) as distinct from requirements that apply to residents who are not relocated for more than one year.

- Packing and Moving Assistance. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
    - Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
    - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
    - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
    - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses. The PHA or Project Owner can choose to do one or more of the following:
        - Undertake the moves itself, using employees of the PHA or Project Owner or "force account labor"[120]
        - Use a contractor or moving company
        - Reimburse residents for all actual, reasonable and necessary moving expenses.
- Storage. The Plan should address whether storage of the resident's personal property is necessary and the arrangements for such storage.
- Damage or Loss. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or 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.
- Out-of-Pocket Expenses. The nature of out of pocket expenses vary based on the nature of the temporary relocation moves. For example, hotel stays or in-place renovation may trigger the need for reimbursement of meals while a kitchen is unavailable. The Plan should outline the anticipated out-of-pocket expenses and the PHA's or Project Owner's plans and budget with respect to these expenses.
- Leasing Arrangements. The Plan should address whether the resident will have a direct lease or other contractual relationship with the owner of the temporary relocation resource or whether the PHA or Project Owner will hold the lease and the resident will maintain a contractual relationship with the PHA or Project Owner.
- Utility Costs. The Plan should address whether residents will need to disconnect and reconnect necessary utilities and, if so, how the PHA or Project Owner anticipates managing this process and any associated expenses. Necessary utilities may include telephone, cable service, Internet access or other items. The Plan should address payment of utility deposits, if required at the temporary relocation housing (HUD Handbook 1378, paragraph 2-7(A)(3)).

[120] Defined at 24 C.F.R. 905.108.

- Reasonable Accommodations. The plan should address whether residents with disabilities will require reasonable accommodations during temporary relocation and, if so, how the PHA or Project Owner anticipates ensuring the provision of reasonable accommodations and any associated expenses. Reasonable accommodations may include, among other items, the provision of transportation assistance, relocation to locations which are physically accessible and located near public transportation, and modifications to policies to allow individuals with disabilities to reside with a live-in aide.

V. Transfer of Assistance

Relocation planning in the context of transfer of assistance is particularly complex. The PHA should address how RAD, URA and Section 104(d) requirements each apply, as the same activity may be treated differently under each regulatory framework. The Plan should specifically outline the PHA's procedures to ensure that the applicable requirements are applied to each situation appropriately. The Plan should also address whether relocation is required for any businesses or residents at the destination site. Finally, the Plan should address whether two moves – from the public housing site to an intermediate site and then to the transfer of assistance site – are necessary while the Covered Project is being constructed or rehabilitated.

VI. Alternative Housing Options and Voluntary Permanent Relocation Assistance

If the PHA or Project Owner seeks to offer alternative housing options, the Plan should identify those options and the manner in which they are presented to residents for decision. The plan should also outline the counseling the PHA or Project Owner will provide to assist the residents in determining what options may be available and the financial implications of those options, for example,

1. Discussion of whether units available in the market (either in the affordable market or the unrestricted market) will meet the financial and dwelling requirements of relocated residents;
2. The general area or location of unit(s);
3. Where applicable, the accessibility of such units for individuals with disabilities;
4. Criteria for receiving relocation assistance; and
5. Any other information that might benefit residents in their consideration of housing choices.

The Plan should identify how the PHA or Project Owner will work with any residents who have elected voluntary permanent relocation. The Plan should further include a description of the permanent relocation assistance the PHA or Project Owner will provide to such residents. Topics to be addressed in the Plan include:

- Replacement Housing. The Plan should address the availability of comparable replacement housing, the notices to be provided and the provisions to ensure that appropriate accessibility features are available in compliance with applicable laws and regulations.

- Fair housing considerations. The Plan should address referrals to housing not located in areas of minority concentration and compliance with requirements regarding accessible housing for persons with disabilities. The Plan should address how the PHA or Project Owner will determine if residents have paid for the acquisition and/or installation of accessible features in the housing from which they are being relocated and how the PHA or Project Owner will ensure that the replacement housing contains required and comparable accessible features or that the resident is appropriately compensated for the cost of acquiring and/or installing required and comparable accessible features.
- Packing and Moving Assistance. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
    - Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
    - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
    - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
    - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses consistent with 49 C.F.R. § 24.301 or, at the resident's option, 49 C.F.R. § 24.302.
- Storage. The Plan should address whether storage of the resident's personal property is necessary and the arrangements for such storage. See 49 C.F.R. § 24.301(g)(4).
- Damage or Loss. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or 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.
- Dislocation Allowance. The Plan should address when the resident is entitled to a dislocation allowance and the amount of such dislocation allowance, consistent with the URA Fixed Residential Moving Cost Schedule available at: www.fhwa.dot.gov/real_estate/uniform_act/relocation/moving_cost_schedule.cfm.
- Appliances. The Plan should address disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property.
- Security Deposits and Utility Costs. The Plan should address how the PHA or Project Owner anticipates managing transfer of utility arrangements, security deposits and any associated expenses. Utilities may include telephone, cable service, Internet access or other items that may have been in place in the resident's original home. See 49 C.F.R. § 24.301(h)(12).
- Replacement Housing Payment. The Plan should address the circumstances in which displaced residents may be entitled to a replacement housing payment (RHP) to cover the

increase, if any, in monthly housing costs for a 42-month period pursuant to URA requirements or a 60-month period pursuant to Section 104(d).[121]

VII. Relocation Budget

Based on the results of the planning process, the PHA or Project Owner 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.) This physical move cost total should be based on the move scenarios anticipated or projected by the resident survey. The move costs should consider:

   For temporary relocation moves:
   - Number and cost of two-way moves (i.e., a move to another unit and then a return move) within the same building/complex.
   - Number and cost of two-way moves to a unit not in the same building/complex

   For permanent moves:
   - Number and cost of one-time moves into another unit in the same building/complex.
   - Number and cost of one permanent move to a unit not within the same building/complex
   - Any required dislocation allowance

4) The estimated cost of projected increases in monthly housing costs and other expenses for temporary relocation (if applicable).

5) The estimated cost of projected replacement housing payments (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.

[121] *See also*, CPD Notice 2014-09 "Effective Date of Moving Ahead for Progress in the 21st Century Act (MAP-21) Changes to Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) Payment Limits and Replacement Housing Payment Eligibility Criteria."

VIII. Written and Oral Communications with Individuals with Disabilities and LEP Persons and Use of Accessible Meeting Locations

The Plan should identify how the PHA or Project Owner will take appropriate steps to ensure effective communication with residents and other individuals with disabilities involved in the relocation, such as through the provision of sign language and other interpreters and large print, Braille, accessible electronic, and other alternate format written communications. The Plan should identify the measures to be taken to ensure the most integrated meeting settings appropriate to individuals with disabilities. The Plan should identify how the PHA or Project Owner will ensure meaningful access for LEP persons, such as through written materials and oral communications provided in languages other than English.

IX. Appeal Process

The Plan should specify the procedures to be followed if a resident disagrees with the PHA's or Project Owner'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. These procedures should include the process for filing a written appeal to the displacing agency and the specific appeal procedures to be followed consistent with 49 C.F.R. 24.10 (and 24 C.F.R. § 42.390 if Section 104(d) is involved).

X. Certification

The Plan should contain a certification of compliance with this Notice (or H 2014-09/PIH 2014-17, if applicable), the URA, fair housing and civil rights requirements and, if applicable, Section 104(d).

Technical Assistance

For detailed technical assistance regarding the contents or provisions of a written relocation plan, the PHA or Project Owner should direct questions to their RAD Transaction Manager or email rad@hud.gov.