PHILADELPHIA HOUSING AUTHORITY
MOVING TO WORK ANNUAL PLAN
FISCAL YEAR 2027
(APRIL 1, 2026 TO MARCH 31, 2027)

FIRST SUBMISSION TO HUD: JANUARY 13, 2026
SECOND SUBMISSION: MARCH 24, 2026
APPROVED BY HUD: MAY 13, 2026
PLAN AMENDMENT #1 APPROVED BY HUD: JUNE 11, 2026
PLAN AMENDMENT #2 APPROVED BY HUD: September 10, 2026

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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 2027, i.e. the period from **April 1, 2026 to March 31, 2027**.

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 currently extends through 2038.

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 2027 Annual Plan incorporates HUD's current reporting requirements as detailed in the HUD Form 50900, which was revised and updated in 2024. 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's long-term MTW strategy focuses on preserving and expanding the supply of affordable housing in Philadelphia through implementation of the ambitious, comprehensive "Opening Doors" asset repositioning and property acquisition plan. Current estimates for this multiyear project exceed $6.8 billion. PHA continues to coordinate its preservation and expansion efforts with Mayor Cherelle Parker's Housing Opportunities Made Easy (H.O.M.E.) Plan to build, restore and preserve 30,000 homes.

Central to PHA's plan and strategy is the agency's ongoing commitment to both protecting resident rights and expanding resident economic opportunities. This strategy is consistent with the five (5) broad objectives PHA established 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 an 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.

As detailed in prior MTW Annual Plans and Annual Reports, enormous progress has been made in advancing each of these objectives. Since 2013, 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 and responding to the affordable housing needs of Philadelphia.

The activities described in the FY 2027 Plan support PHA's efforts to affirmatively further fair housing, operate all housing and service programs in a non-discriminatory manner, and preserve and expand affordable housing. PHA and the City of Philadelphia first collaborated on the development of an Assessment of Fair Housing (AFH) Plan, which was accepted by HUD in February 2017. Subsequently, PHA worked with the City on an AFH update conducted in FY 2023. The AFH Plan calls for a balanced approach to fair housing planning 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 and other initiatives 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.

Short Term FY 2027 MTW Goals and Objectives

PHA will continue and expand its multiyear, ongoing initiatives to substantially transform PHA properties and programs, and to support the revitalization of Philadelphia's neighborhoods, by leveraging MTW 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 (RAD) program. PHA's primary goals include preserving and/or redeveloping its existing affordable housing portfolio through asset repositioning, including public housing and Low Income Housing Tax Credit (LIHTC) units; expanding the supply of new affordable housing units through acquisitions, new development, use of the Faircloth to RAD program, innovative partnerships and the use of all available financing tools; and, opening doors for PHA residents to enhanced services, educational and economic opportunities and affordable homeownership.

PHA will implement a coordinated, comprehensive program of capital improvements, housing and neighborhood development activities, property management initiatives, and resident economic development and supportive services in FY 2027. See also PHA's website at www.pha.phila.gov for detailed information on PHA's many programs and initiatives, and www.phaopeningdoors.com for information on the asset repositioning plan. As PHA's funding for the period is unknown as of the publication date of the MTW Annual Plan, the activities described may be modified based on actual funding levels.

Affordable Housing Preservation, Development and Expansion Highlights

In FY 2027, PHA will utilize MTW funding and programmatic flexibility to accelerate and expand an ambitious development program designed to preserve and expand the supply of affordable housing in Philadelphia. PHA's approach incorporates three broad, interrelated strategies:

- ***Repositioning Public Housing*** – The majority of public housing units in Philadelphia are more than a half century old and many scattered site units were built more than a century ago. As such, the public housing portfolio requires substantial new investments or complete redevelopment in order to provide quality housing for current and future residents. Over the next several years - and building on the work completed since 2013 - PHA will continue to reposition the public housing portfolio to project-based assistance in order to secure the funding needed to preserve and/or redevelop aging housing sites, as well as to provide a more secure and stable funding platform that is capable of sustaining affordable housing over the long-term.

- ***Developing/Acquiring New Affordable Housing*** – Increasing the supply of affordable housing is of critical importance to the future of Philadelphia in light of rapidly increasing housing costs, neighborhood gentrification and other market factors that have created enormous housing cost burdens, increased evictions and exacerbated homelessness among low-income families and individuals. Utilizing MTW flexibility (including MTW Local Non Traditional tools), the Faircloth to RAD program and/or creative use of the financing tools discussed below, PHA is focused on expanding affordable housing production and acquiring existing multifamily properties wherever feasible as part of public housing redevelopment, neighborhood-wide transformation or other partner or PHA-sponsored projects.

- ***Expanding Long-Term Rental Assistance*** – Since 2013, PHA has significantly increased funding for long-term operating subsidies to newly developed or existing housing developments. Long-term rental assistance provided through the Unit Based Voucher program (see below) is a critically important component of PHA's efforts to preserve and expand affordable housing and reduce housing cost burdens for low-income renters.

In support of these interrelated strategies, PHA creatively utilizes MTW funding to leverage other funding and all available financing and programmatic tools including:

- ***HUD's Rental Assistance Demonstration (RAD) Program*** - RAD is a significant component of PHA's efforts to reposition public housing and convert it to Section 8 project-based assistance. Under RAD, the right of existing residents to return to newly constructed or rehabilitated housing is guaranteed and one-for-one replacement of all public housing units is required. The RAD program also incorporates two important features which PHA utilizes to expand the supply of affordable housing: 1) "Faircloth to RAD", also referred to as "Restore-Rebuild", through which PHA is able to tap into unused public housing Annual Contributions Contract (ACC) authority, develop new public housing units using that authority and then convert the public housing to project-based assistance; and 2) "Transfer of assistance" through which PHA is able to transfer subsidies from long-term, vacant and distressed public housing scattered site units to newly developed projects covered by project-based assistance contracts. As summarized in Tables 14 and 15, PHA has closed on 3,926 units under RAD through FY 2026, with an additional 6,915 in the active planning stages for FY 2027 and beyond.

- ***Low Income Housing Tax Credits (LIHTC)*** through the Pennsylvania Housing Finance Agency (PHFA) and other tax credit programs authorized by the federal or state government which support private investments to finance RAD and/or other development activities conducted by PHA and its development partners.

- ***Special Grant Programs*** such as HUD's Choice Neighborhoods Planning and Implementation (CNI) grants which provide funding to support the transformation of public housing developments into newly revitalized mixed-income communities with supportive services and neighborhood amenities. To date, PHA has received a total of three (3) CNI Implementation grants (Sharswood, Norris, Bartram Village) and three (3) CNI Planning grants (Sharswood, Bartram Village, Harrison Plaza).

- ***PHA's Unit Based Leasing and Development (UBV) Program***, which provides long-term operating funding for 5,880 project-based units, with an additional 5,015 expected to be added to the UBV portfolio in FY 2027. UBV funding ensures that rents are affordable for low-income families by capping tenants rent at 30% or less of adjusted household income. The UBV program subsidizes the difference between tenant rents and actual rental costs, which provides a stable and reliable source of funding to building owners. Many UBV developments are owned by mission-driven, neighborhood-based and other organizations that focus on special needs populations and provide on-site or nearby supportive services to tenants.

- ***Tax Exempt Revenue Bonds*** issued by PHA support long term project financing for development, rehabilitation and acquisition projects.

- ***Tenant Protection Vouchers*** provide replacement housing vouchers that can be project-based in connection with HUD Section 18 dispositions of public housing.

Subject to approval by the PHA Board of Commissioners, PHA selects projects for the RAD and UBV programs through competitive procurements and plans to issue additional Requests for Proposals and select additional developer proposals in FY 2027 and subsequent years.

Summary highlights of PHA's planned affordable housing preservation and development initiatives are included below. Note that unit counts, financing sources and development timetables are subject to change based on planning activities, interest rates, funding availability, regulatory agency approvals and other factors. Therefore, there may be variances from year to year in the information provided in the Annual Plan.

Site/Program	Description	FY 2027 Planned Activity
Sharswood/ Blumberg	The Choice Neighborhoods Transformation Plan for Sharswood/Blumberg is the largest mixed-income, mixed-use redevelopment project underway in the City of Philadelphia. Funded in part by a $30 million HUD grant, the original Plan calls for development of over 1,200 units of mixed-income housing, including affordable rentals and homeownership units. Subsequently, PHA has expanded the scope of the project to include a total of 1,216 rental units and 264 homeownership units with an estimated total budget of ~$600 million. As of October 2025, 1,005 rental units have been completed. The remaining 211 rental units are in the design phase, with a projected FY 2027-28 construction start date. With respect to homeownership units, 137 have been completed of which 133 are sold (or under contract); 27 are currently under construction and projected to be substantially complete by the end of FY 2026; and, an additional 100 units are in the planning stages. Complementing this housing activity, construction and occupancy of the new PHA Headquarters Building was completed in January 2019, and PHA launched a new Youth and Family Center on the ground floor in October 2022. A new fresh food supermarket and mixed-used retail center opened in FY 2024 adjacent to PHA Headquarters. Also, the nearby Vaux Community Building was substantially rehabilitated and is now the site of PHA's Workforce Center, a Section 3 Resource Center, a neighborhood high school, a CVS training facility, resident business incubator and other community services. In tandem with other activities, PHA is currently planning a neighborhood "Peace Park". A new PHA Logistics Center in the target area is currently under construction and projected to be completed in FY 2026.	PHA projects that the final rental phases at Ridge Avenue and Cecil B.Moore consisting of 211 units will be under construction in FY 2027-28. An additional 100 homeownership units are projected to be under construction and completed in FY 2027. PHA will also continue to support after school and supportive service programming for low-income youth attending the Big Picture Philadelphia High School located in the Vaux Community Building. Additional rehab activity will take place at Vaux.
Fairhill Apartments	Fairhill Apartments is a distressed 264-unit public housing development. Phase I and II of PHA's ~$232 million master plan for the site involves demolishing and replacing all low-rise units with 65 new-construction townhomes; rehabilitating both towers into senior preference housing; building a new public street to reconnect the site to the surrounding neighborhood; and, creating two community spaces including rehab of the 30,000 sq.ft. Hartranft Community Center. Phase III includes an off-site phase for which PHA has acquired vacant parcels on the surrounding blocks to build 84 additional new construction townhomes, including 10	PHA projects that Phases I and II will be under construction throughout FY 2027.

Site/Program	Description	FY 2027 Planned Activity
	affordable homeownership units. As of October 2025, all residents have been relocated and demolition has been completed. Financial closings and construction starts are projected by the end of FY 2026 for both Phases I and II. PHA was awarded 4% LIHTC by PHFA for Phases I and II. For Phase III, PHA may resubmit for a 9% LIHTC or proceed with a 4% application. Design work has commenced for the rental and homeownership components. Rehab of the Hartranft Community Center rehab has been completed and the Center is now fully operational.	
West Park Apartments	PHA is undertaking the complete redevelopment of the 11+ acre, 327-unit West Park Apartments public housing development into a mixed-income, mixed use neighborhood of choice. PHA's Board approved the selection of development partners LMXD and MSquared and the overall ~$500 million plan to develop 1,000 housing units, including renovation of three existing tower buildings and development of ground floor commercial spaces. Extensive site reconfiguration and infrastructure improvements will be done. Phase I consisting of 327 units is scheduled to close and start construction in late FY 2026. PHFA awarded 9% and two 4% LIHTC allocations for Phase I. PHA plans to issue Phase I tax exempt bonds in FY 2026. In addition, PHFA made a 9% LIHTC award for Phase II.	Phase I construction is projected to be underway throughout FY 2027. PHA may reapply for a CNI implementation grant for West Park. The development team will continue to plan for redevelopment financing and future design phases.
Bartram Village	PHA is working with the community and development partners to implement a ~$336 million Choice Neighborhoods Transformation Plan for Bartram Village that will replace the existing 500 distressed units with approximately 688 mixed-income rental and affordable homeownership units on and off-site. Replacement housing will be included in all rental phases including approximately 80 scattered site PHA-owned units that will be rehabilitated and converted to Project Based Voucher assistance. A series of targeted neighborhood improvements, economic development and resident supportive services will be implemented in tandem with the housing development program. In FY 2024, HUD awarded a $50 million Choice Neighborhoods Implementation to the project, and PHFA awarded a 9% LIHTC for offsite Phase I. Phase I closed in FY 2026, and construction is projected to commence by the end of FY 2026. Rehab work has been completed for the scattered site replacement units.	Phase I construction is underway and will continue throughout FY 2027. Phases II-V contracts have been awarded and are currently in design. PHA anticipates submitting LIHTC application(s) for Phase II in late FY 2027.
Harrison Plaza	HUD awarded PHA a $500,000 Choice Neighborhoods Planning Grant in FY 2024 to support development of a comprehensive Transformation Plan for Harrison Plaza and the surrounding Yorktown neighborhood. PHA has selected a development partner and, in FY 2026, submitted a draft Transformation Plan to HUD. The overall plan has an estimated ~$263 million budget and will build on and complement the successful redevelopment of the existing Harrison Plaza tower	PHA will continue the planning process for redevelopment of Harrison Plaza and the surrounding Yorktown neighborhood and expects to receive HUD approval for the Transformation Plan. PHA may apply for a CNI Implementation grant for Harrison Plaza. PHA anticipates finalizing the Phase I financing plan and

Site/Program	Description	FY 2027 Planned Activity
	which was converted to PBV under the RAD program and has been fully reoccupied.	applying for an LIHTC award in FY 2027.
Brith Sholom	PHA acquired this foreclosed senior building in FY 2025. Planning is underway for a complete rehab of 336 units with an estimated $120 million budget. PHA plans to apply for a 4% LIHTC allocation in FY 2027. Design documents are complete and construction documents are under development.	PHA plans to submit a 4% LIHTC application to PHFA and begin construction in FY 2027.
Rental Assistance Demonstration (RAD)	Through RAD, PHA is able to convert public housing assistance to project-based assistance and to expand assistance through Faircloth to RAD. Conversion of public housing to Project Based Voucher assistance through RAD or Section 18 are critical components of PHA's Opening Doors asset repositioning initiative. Overall, PHA projects that 3,926 units at existing public housing sites, new transfer of assistance and Faircloth to RAD sites will have closed under the RAD program by the end of FY 2026 (*Table 15*).	PHA plans to undertake RAD conversion of an estimated 6,915 additional public housing units in FY 2027 and future years (*Table 14*).
Acquisitions	Expanding the supply of affordable housing by 7,000 units is a key component of the Opening Doors initiative. PHA will continue to pursue opportunities to preserve and expand affordable housing citywide through acquisition of existing multifamily sites and vacant land utilizing MTW flexibility (including Local Non-Traditional tools), Faircloth to RAD, PBV and/or other available methods.	PHA Plans to continue to acquire multifamily properties and vacant land in FY 2027 and future years. *(See discussion in MTW Activity 2025-3).*
Public Housing Development	Working with partners, PHA continues to support the development of new public housing units as part of the Opening Doors Initiative. Most or all of these newly developed units will convert to project-based assistance through Faircloth to RAD at the time of completion or later.	PHA will continue to collaborate with partners to develop 20 new public housing developments with a total of 1,460 units (*Table 1*).
Unit Based Vouchers (UBV)	The UBV program provides long-term, project-based rental assistance for low-income households. UBV developments include both new and existing buildings, and many serve special needs populations and provide supportive services.	PHA plans to enter into UBV contracts for an additional 5,015 units in FY 2027, which includes planned RAD conversions and other development initiatives (*Table 3*). On an ongoing basis, PHA plans to provide UBV subsidies to approximately 5,880 affordable housing units (*Table 4*). In addition to utilizing MTW funding, PHA incorporates MTW flexibility in admissions, continued occupancy and other areas.
Scattered Sites	PHA's asset repositioning strategy includes the conversion of approximately 3,700 scattered site public housing units to the PBV program in tandem with performing unit repairs and upgrades to improve conditions and ensure long-term viability. The first phase involves approximately 1,200 units in AMPS 901, 902 and 903. PHA requested and received HUD approval for a Section 18 disposition for these AMPS. Section 18	Subject to HUD approval of the Section 18 disposition request for AMPS 905-907, PHA will proceed to convert those units to PBV. Further, subject to PHA Board approval, PHA plans to request HUD approval for a Section 18 disposition, RAD conversion

Site/Program	Description	FY 2027 Planned Activity
	disposition applications for AMPS 905, 906 and 907 were submitted in FY 2026 and are pending HUD approval. As of October 2025, PHA has begun the conversion of AMPS 901 and 903, utilizing HUD Tenant Protection Vouchers (TPV) and a small number of tenant-based vouchers. Subject to HUD's award of additional TPVs for AMP 902, PHA plans to convert AMP 902 by the end of FY 2026.	and/or RAD/Section 18 blend for additional scattered site AMPS which may include some or all of AMPS 904 and 908-910.

Other MTW Highlights for FY 2027

- ***Workforce Development, Youth Development & Other Supportive Services*** – In FY 2027, PHA will partner with the William Penn Foundation to provide services and support to Public Housing families who are at risk of eviction. Services, which include financial coaching, will be targeted to families with young children, under the age of 8, who are at risk of lease enforcement and eviction.

  PHA will continue to provide services to support the full range of families' needs, from early childhood development to supportive services for the elderly. PHA will work directly with residents through the Resident Programs and Partnerships (RPP) Department and their Workforce Center, Section 3 Resource Center and Job Bank, and the Youth and Family Center, a drop-in center offering a weekly schedule of partner programs and events. PHA will continue to collaborate with long-term partners, including the William Penn Foundation and Temple University, and leverage MTW funding flexibility to expand the programming and support available to PHA families. A summary of PHA's MTW and Non-MTW funded resident services programs is included in the Annual Plan (*Table 11*).

- ***Sponsor-Based Shared Housing Pilot*** – In FY 2027, PHA will continue providing housing opportunities for homeless individuals and other hard to serve special populations, building on and enhancing the ongoing collaboration between the City and PHA to reduce homelessness through the "Blueprint to End Homelessness" initiative. PHA will also offer housing options to eligible low-income students in partnership with the Community College of Philadelphia (CCP). In total, PHA anticipates that this pilot program will provide 41 housing opportunities, which includes 35 units made available through the partnership with the City and six (6) units through the CCP partnership.

- ***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. Due to the program's success, PHA will use MTW funding to continue and expand the pilot program. Mobility Counselors will continue to provide a broad range of supportive services and housing counseling to voucher-holders and conduct landlord outreach in order to promote the successful transition of families to higher opportunity areas.

- ***Homeownership*** – Through the MTW Opening Doors to Affordable Homeownership Program (ODAHP), PHA consolidates the existing Section 5h and HCV Homeownership programs with

new homeownership initiatives that provide additional financing support for first-time homeowners. Soft-second mortgage and down payment assistance will be offered to eligible participants, in addition to homeownership counseling and support. Overall, PHA projects that 50 low-income households will become first time homebuyers in FY 2027.

- ***Second Chance Initiative*** – PHA expanded the Second Chance program in FY 2024, making 20 additional vouchers available to formerly incarcerated returning citizens that are active participants in good standing with the Eastern District Federal Court Supervision to Aid Reentry (STAR) Program. PHA anticipates serving up to 30 returning citizens, who will receive housing assistance and supportive services through the program in FY 2027. PHA will also continue to provide for extensions to the two-year program term for STAR participants.

- ***Partnership with Civic Coalition to Save Lives*** - PHA will continue its partnership with the Civic Coalition to Save Lives to provide housing stability to victims of, and those at risk of, gun violence. PHA will provide up to 30 housing opportunities for qualified participants referred by the Coalition. PHA will provide a limited local preference for applicants who are victims of, or at risk of, gun violence and their families as well as individuals who have lost their homes or were displaced due to gun violence. The Coalition, or their designee, will refer qualified applicants to PHA. PHA and/or partnering service providers will provide supportive services to families housed under this initiative, including counseling, trauma-informed care, legal assistance, among other supports.

- ***Family Self-Sufficiency*** – Through the local MTW FSS program, PHA encourages broader participation in FSS through a revised escrow model, in which monthly escrow credits are determined by earned income, rather than the change in their Total Tenant Payment (TTP). To incentivize completion of interim goals, PHA will provide financial incentives for participants who meet interim goals related to education and job training. PHA also will provide financial incentives to graduating families to encourage homeownership and transition to self-sufficiency. In FY 2027, PHA anticipates increasing overall participation, adding 100 new families to the MTW FSS program, bringing the total number of families served to 700.

- ***Rent Simplification and Program Streamlining Initiatives*** – To simplify program administration and provide incentives for economic self-sufficiency, PHA will continue to implement previously approved MTW policies related to recertification and rent calculation. As described in Activity 2004-03, the regulations waived by the MTW Agreement and subsequently amended by the Housing Opportunities through Modernization Act (HOTMA) will continue to be waived where permitted by the relevant provisions of the MTW agreement. These include waivers that permit PHA to implement MTW policies for required interim reporting, verification, calculation of income and rent, and the application of payment standards. In FY 2025, PHA also implemented Activity 2025-01 to permit pre-inspections and to inspect certain units in the tenant-based and project-based programs once every three years. PHA will continue to look for opportunities to streamline 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 Resident Roundtable 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 1,957 units at 29 developments to its public housing inventory in FY 2027 as summarized in Table 1. PHA competitively selected the listed developments 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 and bedroom size mix may vary depending on several factors including changes to financing plans and construction schedules, receipt of Low-Income Housing Tax Credits, HUD and City of Philadelphia 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 and/or City of Philadelphia for these developments. PHA plans to issue a new Request for Proposals (RFP) during FY 2027 and may select additional developments for receipt of public housing Annual Contributions Contract(s) as a result of that or prior RFP(s), subject to approval of the PHA Board of Commissioners. Due to changes in development plans and schedules, planned developments shown in Table 1 may also appear in prior or subsequent Annual Plans.

Prior to occupancy, the majority or all of the Table 1 developments will be converted to Project Based Voucher (PBV) assistance pursuant to the Rental Assistance Demonstration (RAD) "transfer of assistance" or "Faircloth to RAD" provisions and, thus, may also be listed in Tables 14 or 15. In addition to the new public housing units detailed on Table 1, PHA and/or its development partners plan to develop other public housing units to be converted to Project Based Voucher assistance through the "Faircloth to RAD" initiative over the course of FY 2027. Further information on PHA's planned Faircloth to RAD activities is included in the Rental Assistance Demonstration discussion below.

Table 1: Planned New Public Housing Units in FY 2027

	Bedroom Size								Section 504 Accessible Units	
AMP Name/#*	0	1	2	3	4	5+	Total Units**	Population Type	Mobility	Hearing/ Vision
11th and Berks	0	65	62	9	0	0	136	General		
28th & York	0	15	21	19	0	0	55	General		
5000 Warrington Ave	0	4	30	16	0	0	50	General		
Beech Senior Apartments	10	90	0	0	0	0	100	Senior 62+	10	
Brith Sholom	0	315	21	0	0	0	336	Senior 62+		
Cecil B. Moore Senior	0	51	12	0	0	0	63	Senior 62+		
Fairhill III	0	2	7	52	13	0	74	General		
Fairmount Flats	0	12	12	0	0	0	24	General	3	
Frankford TOD	37	58	30	7	0	0	132	General	18	4

AMP Name/#*	Bedroom Size						Total Units**	Population Type	Section 504 Accessible Units	
	0	1	2	3	4	5+			Mobility	Hearing/ Vision
Gaudenzia Cathedral Homes	0	13	16	11	0	0	40	General	8	2
HACE – Fairhill and Hugh St. Lofts Scattered Sites	0	43	0	0	0	0	43	Senior 62+		
Media Flats – 6435 Media Street	0	27	6	0	0	0	33	Senior 62+		
New Africa Center	11	24	6	0	0	0	41	General		
Philly House Residence	70	0	0	0	0	0	70	General		
Project Home – 4912 Griscom Street	44	0	0	0	0	0	44	General		
Scattered Sites (Intensified Builders)	0	3	20	2	0	0	25	General		
The Queen Senior Apartments	0	49	0	0	0	0	49	Senior	13	2
Walton School	0	48	3	0	0	0	51	Senior 62+	6	2
West Philadelphia Preservation	0	45	0	0	0	0	45	General		
Westbrook Community Apartments	0	32	6	12	0	0	50	General, Disabled	13	
Avenue V	31	89	0	0	0	0	120	Senior		
Oxford Village	0	28	104	5	0	0	137	General		
Bernice Arms	0	45	1	0	0	0	46	Senior		
NewCourtland at Henry Tower	0	40	0	0	0	0	40	Senior		
Nayda Cintron Apartments	0	1	6	23	0	0	30	General	10	2
17th Street Community Corridor - Phase II	0	20	12	6	0	0	38	General	12	2
Germantown YWCA	5	41	5	0	0	0	51	Senior	6	
Melville Way	0	0	2	6	0	0	8	General	2	
Drueding Center Residential	0	0	22	4	0	0	26	General	6	
Total Public Housing Units to be Added in FY 2027							**1,957**			

**AMP numbers have not yet been assigned.*
***Refers to total public housing units. Actual total unit count and bedroom size mix may vary and include other types of units including, but not limited to, market rate, LIHTC only, and Project Based Vouchers.*

ii. Planned Public Housing Units to Be Removed

In FY 2027, PHA plans to demolish and/or dispose of a projected 9,507 units as summarized in Table 2. The planned demolition and disposition initiatives are related to PHA's revitalization program, ongoing portfolio assessment and repositioning efforts including conversion of public housing units to project-based assistance under the RAD program, Section 18, or RAD/Section 18 blend methods. Table 2 does not include new public housing units shown in Table 1 that will be converted to project-based assistance through Faircloth to RAD or RAD transfer of assistance unless HUD has assigned a PIC AMP number. 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 is likely to vary depending on timetables for HUD and City of Philadelphia approvals, project financing, RAD closings and other factors. Due to variances in development schedules and changes in development priorities, units listed in Table 2 may include units listed in prior year Annual Plans for which demolition and/or disposition has not yet occurred.

Table 2: Planned Public Housing Units to Be Removed in FY 2027

AMP	Development Name	# of Units to be Removed	Explanation for Removal
PA2-030	Abbottsford	236	Conversion of existing public housing development
PA2-159	Angela Court II	54	Conversion of existing AME public housing development
PA2-146	Angela Court/St. Ignatius	67	Conversion of existing AME public housing development
PA2-031	Bartram Village Phase 1	52	Conversion of existing public housing development
PA2-031	Bartram Village Phases II - IV	436	Conversion of existing public housing development
PA2-137	Cambridge I	44	Conversion of existing PAPMC public housing development
PA2-129	Cambridge II	40	Conversion of existing PAPMC public housing development
PA2-147	Cambridge III	40	Conversion of existing PAPMC public housing development
PA2-062	Cassie Holley	71	Conversion of existing public housing development
PA2-189	Dauphin House	52	Conversion of existing AME public housing development (26 units) and Faircloth to RAD (26 units)
PA2-126	Eight Diamonds	152	Conversion of existing AME public housing development
PA2-130	Falls Ridge	135	Conversion of existing AME public housing development
PA2-152	Germantown House	133	Conversion of existing PAPMC public housing development
PA2-139	GGFE I	245	Conversion of existing PAPMC public housing development
PA2-143	GGFE II	184	Conversion of existing PAPMC public housing development
PA2-114	Gladys B. Jacobs	80	Conversion of existing public housing development
PA2-015	Harrison Plaza Low Rise	188	Conversion of existing public housing development
PA2-176	Impact Services Veterans Family Housing	18	Conversion of existing AME public housing development
PA2-001	Johnson Homes	533	Conversion of existing public housing development
PA2-145	LEB I	80	Conversion of existing PAPMC public housing development
PA2-150	LEB II	80	Conversion of existing PAPMC public housing development
PA2-153	LEB III	50	Conversion of existing PAPMC public housing development

AMP	Development Name	# of Units to be Removed	Explanation for Removal
PA2-186	Liberty 52	24	Conversion of existing AME public housing development
PA2-157	Ludlow Phase III	75	Conversion of existing PAPMC public housing development
PA2-184	Maguire Residence	27	Conversion of existing AME public housing development
PA2-163	Mantua I	50	Conversion of existing PAPMC public housing development
PA2-165	Mantua II	51	Conversion of existing PAPMC public housing development
PA2-156	Marshall Shepard	80	Conversion of existing PAPMC public housing development
PA2-128	MLK I	49	Conversion of existing AME public housing development
PA2-136	MLK III	45	Conversion of existing AME public housing development
PA2-149	MLK IV	42	Conversion of existing PAPMC public housing development
PA2-138	Mt. Olivet	161	Conversion of existing PAPMC public housing development
PA2-158	Nellie Reynolds Gardens	64	Conversion of existing PAPMC public housing development
PA2-148	Neumann North	67	Conversion of existing AME public housing development
PA2-177	New Courtland at Allegheny	56	Conversion of existing AME public housing development
PA2-182	New Courtland Apartments at Henry Avenue	49	Conversion of existing AME public housing development
PA2-193	New Courtland at Henry Avenue Phase 1B	36	Conversion of existing AME public housing development
PA2-188	Nicole Hines Townhomes	23	Conversion of existing AME public housing development
PA2-173	Paschall I	50	Conversion of existing PAPMC public housing development
PA2-175	Paschall II	50	Conversion of existing PAPMC public housing development
PA2-190	Peg's Place	40	Conversion of existing AME public housing development
PA2-003	Richard Allen Homes	150	Conversion of existing public housing development
PA2-133	Richard Allen III	178	Conversion of existing PAPMC public housing development
PA2-131	Saint Anthony's Senior Residence	38	Conversion of existing AME public housing development
PA2-905	Scattered Sites Fairhill Square	653	Disposition or demolition of scattered site properties
PA2-906	Scattered Sites Francisville	519	Disposition or demolition of scattered site properties
PA2-904	Scattered Sites Germantown	318	Disposition or demolition of scattered site properties
PA2-907	Scattered Sites Ludlow	519	Disposition or demolition of scattered site properties

AMP	Development Name	# of Units to be Removed	Explanation for Removal
PA2-910	Scattered Sites Oxford Jefferson	422	Disposition or demolition of scattered site properties
PA2-909	Scattered Sites Strawberry Mansion	587	Disposition or demolition of scattered site properties
PA2-908	Scattered Sites Susquehanna	438	Disposition or demolition of Scattered Site properties
PA2-020	Spring Garden Apartments	202	Conversion of existing public housing development
PA2-181	St. Francis Villa	40	Conversion of existing AME public housing development
PA2-192	St. Rita Place Senior Housing	46	Conversion of existing AME public housing development
PA2-132	Suffolk Manor	137	Conversion of existing PAPMC public housing development
PA2-160	Warnock I	50	Conversion of existing PAPMC public housing development
PA2-161	Warnock II	45	Conversion of existing PAPMC public housing development
PA2-039	West Park Apartments	327	Conversion of existing public housing development
PA2-013	Wilson Park	728	Conversion of existing public housing development
	Total	**9,406**	

PHA has received approval from HUD to dispose of 1800 S. 32nd Street, an administrative building property that is in excess of its needs due to the construction of the Agency's consolidated headquarters. PHA may proceed with the disposition of this property in FY 2027.

Also in FY 2027, PHA may submit applications to HUD for demolition and/or disposition of an additional administrative building:

- 3100 Penrose Ferry Rd

PHA may sell or lease the administrative properties based on an assessment of which option will generate the greatest benefit to PHA. PHA may sell these properties at fair market value or at less than fair market value if the future use of the property will be affordable housing. PHA believes that the dispositions are in the best interest of PHA, its residents, and the City of Philadelphia. Finally, PHA intends to submit a disposition application to transfer property in North Philadelphia (primarily in PA2-905) to various nonprofits, land trusts and other entities for the development and preservation of affordable housing. PHA will also submit demolition applications for properties in North Philadelphia (PA2-907) for development activities in the area of PHA's Fairhill development and for properties in Sharswood (PA2-910) in connection with redevelopment efforts in the Sharswood neighborhood.

iii. Planned New Project-Based Vouchers

PHA 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 commit to subsidize with vouchers during the Plan Year. This includes RAD conversion developments that PHA projects to be newly placed under commitment or contract in FY 2027. Overall, PHA projects that 5,015 additional units will be placed under commitment or contract in FY 2027. PHA may issue a new Request for Proposals (RFP) during FY 2027 and may select additional developments for receipt of unit-based vouchers as a result of that or prior RFP(s), 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. Due to changes in development plans and schedules, planned developments shown in Table 3 may also appear in prior or subsequent Annual Plans.

Table 3: New Housing Choice Vouchers to be Project-Based in FY 2027

Property Name	# of Vouchers to be Project-Based	RAD?	Description of Project
17th Street Community Corridor Project Phase 1	40	Yes	New construction sponsored by Pathways Housing Wellness Corporation. Supportive services to be provided.
28th & York	55	Yes	New construction sponsored by PHA.
5000 Warrington Avenue	50	Yes	New construction sponsored by Paths Development.
8 Diamonds	152	Yes	New construction sponsored by The Michaels Organization
Abbottsford	236	Yes	Conversion of existing public housing development
Abigail Pankey Apartments (Brown Street Apartments)	21	Yes	New construction in Mantua development by WCRP
Angela Court I	67	Yes	New construction sponsored by St. Ignatius
Angela Court II	54	Yes	New construction sponsored by St. Ignatius
Apartments at 40th Street Place	40	Yes	New construction in Mantua and Belmont sponsored by Mount Vernon Manor CDC
Bartram Village Phases II - IV	436	Yes	Conversion of existing public housing development
Beech Senior	100	Yes	A rehab project near Temple University sponsored by Beech Interplex
Clearfield Apartments	48	Yes	New construction in Allegheny West sponsored by New Courtland.
Compassion Senior Living	23	Yes	New construction in the Cobbs Creek neighborhood for seniors. Sponsored by Compassion Senior Living. Supportive services provided.
Fairhill I	131	Yes	New construction sponsored by PHA.
Fairhill II	133	Yes	New construction sponsored by PHA.
Fairhill III	132	Yes	New construction sponsored by PHA.
Fairmount Flats	24	Yes	New construction sponsored by Stonewater Development Group.
Frankford TOD	132	Yes	New construction sponsored by Frankford Community Development Corporation/Mosaic Development Partners

Property Name	# of Vouchers to be Project-Based	RAD?	Description of Project
Gaudenzia Cathedral Homes	40	Yes	New construction sponsored by Gaudenzia.
Germantown House	133	Yes	Conversion of existing public housing (PAPMC) development serving seniors
Good Shepherd Senior	31	Yes	New construction in Overbrook sponsored by Pennrose.
HACE – Fairhill and Hugh St. Lofts Scattered Sites	43	Yes	New construction sponsored by HACE
Hancock Manor Phase II	13	No	Existing PB VASH to MTWPB development
Impact Services Veterans Housing	18	Yes	Existing public housing (AME) development serving veterans.
Johnson Homes	533	Yes	Conversion of existing public housing development
LEB I	80	Yes	Conversion of existing public housing (PAPMC) development
LEB II	80	Yes	Conversion of existing public housing (PAPMC) development
LEB III	50	Yes	Conversion of existing public housing (PAPMC) development
Liberty 52	24	Yes	Conversion of existing public housing (AME) development
Liberty 53 (Estelle B. Richman Place)	31	Yes	New construction in West Philadelphia sponsored by Liberty Resources.
Liddonfield	150	No	New construction for seniors in Northeast Philadelphia sponsored by New Courtland. Supportive services are provided.
Linda Lockman King Apartments	23	Yes	New construction sponsored by the Women's Community Revitalization Project. Supportive services to be provided.
Ludlow Phase III	75	Yes	Conversion of existing public housing (PAPMC) development
Maguire Residence	27	Yes	Conversion of existing public housing (AME) development
Mantua I	50	Yes	Conversion of existing public housing (PAPMC) development
Mantua II	51	Yes	Conversion of existing public housing (PAPMC) development
Marshall Shepard	80	Yes	Conversion of existing public housing (PAPMC) development
Media Flats – 6435 Media Street	33	Yes	New construction sponsored by Diamond & Associates
Nellie Reynolds Gardens	64	Yes	Conversion of existing public housing (PAPMC) development serving seniors
Neumann North	67	Yes	Public Housing AME to RAD conversion
New Africa Center Phase I	33	Yes	New construction sponsored by ICPIC/Mosaic Development Partners
New Africa Center Phase II	8	Yes	New construction sponsored by ICPIC/Mosaic Development Partners
New Courtland at Henry Ave	49	Yes	Rehabilitation of Henry Ave tower for seniors sponsored by New Courtland. Supportive services to be provided.

Property Name	# of Vouchers to be Project-Based	RAD?	Description of Project
New Courtland at Henry Avenue Phase 1B	36	Yes	Existing public housing (AME) development for seniors.
Nicole Hines Townhomes	23	Yes	Conversion of existing public housing (AME) development
North Park Avenue	40	Yes	New construction sponsored by Project HOME. Supportive services to be provided.
Opportunities Apartments	28	Yes	New construction in Nicetown sponsored by Opportunities Services Corporation.
Paschall I	50	Yes	Conversion of existing public housing (PAPMC) development
Paschall II	50	Yes	Conversion of existing public housing (PAPMC) development
Peg's Place	40	Yes	Conversion of existing public housing (AME) development
Philly House Residence	70	Yes	New construction sponsored by Philly House
Project Home – 4912 Griscom Street	44	Yes	New construction sponsored by Project HOME.
Richard Allen Homes	150	Yes	Conversion of existing public housing development
Scattered Sites	25	Yes	New construction sponsored by Intensified Builders.
Sepviva Lofts	51	Yes	New construction sponsored by Liberty Housing Development Corp.
Spring Garden Apartments	202	Yes	Conversion of existing public housing development
St. Francis Villa	40	Yes	Conversion of existing public housing (AME) development
St. Katherine Drexel Place	48	Yes	Rehabilitation and New Construction
St. Rita Place Senior Housing	46	Yes	Conversion of existing public housing (AME) development serving seniors
Strawberry Mansion Village	35	No	New construction in the Strawberry Mansion neighborhood sponsored by Pennrose. Supportive services to be provided.
The Queen Senior Apartments	49	Yes	New construction sponsored by Intensified Builders.
Warnock I	50	Yes	Conversion of existing public housing (PAPMC) development
Warnock II	45	Yes	Conversion of existing public housing (PAPMC) development
West Park Phase 1A	58	Yes	Existing public housing project. Rehab and new construction after closing.
West Park Phase 1B	39	Yes	Existing public housing project. Rehab and new construction after closing.
West Park Phase 1C	41	Yes	Existing public housing project. Rehab and new construction after closing.
West Philadelphia Preservation	45	Yes	New construction
Westbrook Community Apartments	50	Yes	New construction and adaptive use in the Tioga section sponsored by Germantown Development Group, LLC - a Westbrook Foundation Partnership
Total	**5,015**		

iv. Planned Existing Project Based Vouchers

In addition to planned new project-based vouchers, PHA will continue to provide 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 committed and/or under contract, and that PHA projects will be under contract throughout FY 2027. As noted, there are 5,880 units in this category. Actual figures may vary depending on several factors including contract terminations, unit additions and subtractions.

Table 4: Existing Project-Based Vouchers in FY 2027

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
1315 North 8th Street	25	Leased/Issued	Yes	New construction targeted for youths aging out of foster care in the West Poplar neighborhood (homeless) sponsored by Project HOME. Supportive services are provided.
1415 Fairmount JBJ Homes	15	Leased/Issued	No	Existing site for homeless with special needs in the Fairmount area sponsored by Project Home. Supportive services are provided.
2415 N Broad St	88	Leased/Issued	Yes	New construction in North Philadelphia serving homeless individuals, sponsored by Project Home. Supportive services are provided.
27th & Susquehanna	78	Leased/Issued	Yes	New construction in Strawberry Mansion for low-income families sponsored by Susquehanna Net Zero Housing LP.
4050 Apts	20	Leased/Issued	No	New construction for income-eligible artists in West Philadelphia sponsored by People's Emergency Center. Supportive services are provided.
46th St	4	Leased/Issued	No	Existing site for low-income families in South Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
810 Arch St	70	Leased/Issued	No	New construction development for Homelessness in Center City Philadelphia sponsored by Project Home. Supportive services are provided.
A & Indiana	48	Leased/Issued	Yes	New construction sponsored by Impact Services Corp.
Academy Rd 2005	18	Leased/Issued	No	Existing site for low-income families in Roxborough section of Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Academy Rd 2022	20	Leased/Issued	No	Existing project in the Northeast area at 714-718 Rhawn St and 11901-13 Academy Rd for disabled homeless or at risk of homelessness sponsored by Mission First.

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
Amor	8	Leased/Issued	No	New construction in the Hunting Park neighborhood sponsored by Esperanza.
Anna's House	12	Leased/Issued	No	Existing site for homeless/mental health individuals in South Philadelphia sponsored by CATCH. Supportive services are provided.
Arch V Temple	49	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Arch VI Temple	40	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Arch VII LIH Walnut	14	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Art Apartments	30	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Pine Lake Management Associates, LP.
AWF Plaza	45	Leased/Issued	Yes	New construction sponsored by Allegheny West Foundation
Bartram I	64	Leased/Issued	Yes	New construction sponsored by Pennrose
Be A Gem Crossing (North 10th Street)	41	Leased/Issued	Yes	New construction sponsored by Impact Services Corp.
Belmont I	25	Leased/Issued	No	New construction site for the disabled in West Philadelphia sponsored by Inglis House. Supportive services are provided.
Belmont II	15	Leased/Issued	No	New construction site for the disabled in West Philadelphia sponsored by Inglis House. Supportive services are provided.
Benner/Frankford	8	Leased/Issued	No	Existing site for low-income families in South Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Bethesda Project Bainbridge	20	Leased/Issued	No	Existing site for homeless/mental health individuals in South Philadelphia sponsored by Bethesda Project. Supportive services are provided.
Bethesda Project South	4	Leased/Issued	No	Existing site for homeless/mental health individuals in South Philadelphia sponsored by Bethesda Project. Supportive services are provided.
Bethesda Project Spruce	13	Leased/Issued	No	Existing site for homeless/mental health individuals in South Philadelphia sponsored by Bethesda Project. Supportive services are provided.
Bigham Place	7	Leased/Issued	No	New construction development for homeless families in Mantua sponsored by People's

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
				Emergency Center. Supportive services are provided.
Blakiston St	7	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Blumberg 83 Phase III	83	Leased/Issued	Yes	New construction in Blumberg/Sharswood neighborhood serving low-income families sponsored by PHA.
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 Phase I	6	Leased/Issued	No	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	Substantial rehab of an existing site for seniors sponsored by PHA. Supportive services are provided.
Boriquen	17	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Boriquen Associates II Limited. Supportive services are provided.
Brentwood Parkside	22	Leased/Issued	No	Existing site for very low-income seniors and families in West Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Casa Indiana	50	Leased/Issued	Yes	New construction sponsored by HACE
Centennial Village	23	Leased/Issued	No	New construction for low-income families, seniors, disabled in West Philadelphia sponsored by Community Ventures. Supportive services are provided.
Chatham Court Apts	18	Leased/Issued	No	Existing site for low-income families in West Philadelphia sponsored by Ingerman. Supportive services are provided.
Chestnut St	6	Leased/Issued	No	Existing site for low-income families in West Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Cloisters III	18	Leased/Issued	No	Existing site for homeless individuals in West Philadelphia sponsored by Cloisters III Housing Partnership. Supportive services are provided.
CNI Norris/North Central Phase III	28	Leased/Issued	Yes	New construction replacement of existing family public housing site sponsored by PHA.
Conklin St	3	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Mission

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
				First Housing Group. Supportive services are provided.
Courtyard at Riverview	470	Leased/Issued	Yes	Rehabilitation of existing housing serving low-income families and seniors, sponsored by Michaels Organization.
Dignity Boss	8	Leased/Issued	No	Existing site for women and children domestic violence victims in Germantown/Mt Airy sponsored by Community For Dignity & Fairness. Supportive services are provided.
Dignity Nedro	4	Leased/Issued	No	Existing site for women and children domestic violence victims in Northwest Philadelphia sponsored by Community For Dignity & Fairness. Supportive services are provided.
Dignity-1	10	Leased/Issued	No	Existing site for women and children domestic violence victims in Germantown, sponsored by Community For Dignity & Fairness Supportive services are provided.
Dignity-15	4	Leased/Issued	No	Existing site for women and children domestic violence victims in Germantown, sponsored by Community For Dignity & Fairness Supportive services are provided.
Dignity-21	9	Leased/Issued	No	Existing site for women and children domestic violence victims in Germantown, sponsored by Community For Dignity & Fairness Supportive services are provided.
Dignity-33	16	Leased/Issued	No	Existing site for women and children domestic violence victims in Germantown, sponsored by Community For Dignity & Fairness Supportive services are provided.
Dignity-4	3	Leased/Issued	No	Existing site for women and children domestic violence victims in Germantown, sponsored by Community For Dignity & Fairness Supportive services are provided.
Ditman St	10	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Dunlap School	35	Leased/Issued	No	Existing site for seniors in North Philadelphia sponsored by Dunlap Management Partners LP. Supportive services are provided.
Edgewood Manor	33	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Edgewood Manor II Lap. Supportive services are provided.
Elders Place I	43	Leased/Issued	No	Existing senior site in Germantown sponsored by Penn Housing LLC. Supportive services are provided.
Elders Place II	38	Leased/Issued	No	Existing senior site in Germantown sponsored by Penn Housing LLC. Supportive services are provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
Father Augustus Tolton (Eastwick)	45	Leased/Issued	Yes	New construction in the Eastwick neighborhood for seniors. Sponsored by Catholic Housing and Community Services.
Fattah Homes II	6	Leased/Issued	No	New construction development for homeless families in Mantua sponsored by People's Emergency Center. Supportive services are provided.
FOP Senior	45	Leased/Issued	No	Existing housing. Vouchers Awarded by HUD and Administered by PHA. Rehab after closing.
Fourth St Access	24	Leased/Issued	No	Existing site for low-income families in North Philadelphia. Project sponsor is Mission First Housing Group. Supportive services are provided.
Francis House	10	Leased/Issued	No	New construction for seniors in Northeast Philadelphia sponsored by St Ignatius. Supportive services are provided.
Francisville East	10	Leased/Issued	No	Existing project in the Francisville area at 1703-20 Edwin Walk, 1747 Wyle St and 874 Perkiomen St for low-income seniors and families sponsored by Community Ventures.
Francisville Village	10	Leased/Issued	No	Existing project in the Francisville area at 1504-25 Poplar St for low-income families sponsored by Community Ventures.
Freedom Village	16	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Freedom Village LP.
Gaudenzia Shelton Court	13	Leased/Issued	No	Existing site for homeless low-income individuals in the East Oak Lane section of Philadelphia sponsored by Gaudenzia Foundation Inc. Supportive services are provided.
Gaudenzia Thompson St	6	Leased/Issued	No	Existing site for homeless low-income individuals in the North Central section of Philadelphia sponsored by Gaudenzia Foundation Inc. Supportive services are provided.
Gaudenzia Tioga Family Center	24	Leased/Issued	No	New construction development for homeless low-income individuals in North Philadelphia sponsored by Gaudenzia Foundation Inc. Supportive services are provided.
Gordon St	21	Leased/Issued	No	New construction for low-income families sponsored by Philadelphia Housing Authority.
Haddington III	48	Leased/Issued	Yes	New construction in West Philadelphia for low-income families, sponsored by 1260 Housing Development Corp. Supportive services are provided.
Hancock Manor	24	Leased/Issued	No	Existing housing sponsored by HACE. Rehab after closing.

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
Harlan Street	22	Leased/Issued	No	New construction in the Sharswood neighborhood sponsored by Michaels Development.
Harrison Plaza	4	Leased/Issued	No	Conversion of tower in existing public housing development sponsored by PHA.
Harrison Plaza Senior Tower	112	Leased/Issued	Yes	Conversion of tower in existing public housing development sponsored by PHA.
Help I	14	Leased/Issued	No	New construction development for veterans in West Philadelphia sponsored by HELP USA. Supportive services are provided.
Help II	50	Leased/Issued	No	New construction development for veterans in West Philadelphia sponsored by HELP USA. Supportive services are provided.
HELP IV	15	Leased/Issued	No	New construction development for veterans in West Philadelphia sponsored by HELP USA. Supportive services are provided.
HELP V	37	Leased/Issued	Yes	New construction in Northern Liberties section of Philadelphia serving veterans and senior veterans, sponsored by HELP USA. Supportive services are 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 are 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 are provided.
HSM-FRP-1-LLC	1	Leased/Issued	No	Existing site for low-income families in West Philadelphia sponsored by Friends Rehab. Supportive services are provided.
HSM-FRP-3-LLC	2	Leased/Issued	No	Existing site for low-income families in West Philadelphia sponsored by Friends Rehab. Supportive services are provided.
HSM-FRP-6-LLC	1	Leased/Issued	No	Existing site for low-income families in West Philadelphia sponsored by Friends Rehab. Supportive services are provided.
HSM-FRP-7-LLC	2	Leased/Issued	No	Existing site for low-income families in West Philadelphia sponsored by Friends Rehab. Supportive services are 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 are 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 are provided.
Imani Homes III	6	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 FY 2027	RAD?	Description of Project
				Services of Philadelphia. Supportive services are provided.
Imani Homes IV	8	Leased/Issued	No	Existing site for homeless individuals in West Philadelphia sponsored by Methodist Family Services of Philadelphia. Supportive services are 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 are provided.
Impact Veterans	8	Leased/Issued	No	Existing site for Veteran Families in North Philadelphia sponsored by Impact Services. Supportive services are provided.
Inglis House-Elmwood	40	Leased/Issued	No	Existing site for the disabled sponsored by Inglis House. Supportive services are provided.
Inglis Methodist Gardens	47	Leased/Issued	Yes	New construction sponsored by Methodist IMG Inc
Inglis Morris Klein	17	Leased/Issued	No	Existing site for the disabled sponsored by Inglis House. Supportive services are provided.
Jackson St	2	Leased/Issued	No	Existing site for low-income families in West Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Janney Apartment	29	Leased/Issued	Yes	New construction in the Richmond neighborhood sponsored by Human Good.
K&A Beacon of Hope	30	Leased/Issued	No	New Construction in the Kensington neighborhood sponsored by Deep Sea Group
Kate's Place	35	Leased/Issued	No	Existing site for singles and people with disabilities in the Center City area sponsored by Peoples Emergency Center. Supportive services are provided.
Kearsley Estates	30	Leased/Issued	No	Existing development in the Belmont neighborhood sponsored by Tryko
Kendrick/Gillespie St	11	Leased/Issued	No	Existing site for low-income families in Holmesburg sponsored by Mission First Housing Group. Supportive services are provided.
Keystone St	6	Leased/Issued	No	Existing site for families in Northeast Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Kings Highway Phase II	31	Leased/Issued	No	Existing project in the Kensington area at 2004-06 Stella St, 2927-73 Frankford Ave and 3024-26 Frankford Ave for low-income families sponsored by Mission First.
Larchwood St	4	Leased/Issued	No	Existing site for low-income families in Spruce Hill section of Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
Lehigh Park I	49	Leased/Issued	Yes	Rehabilitation of existing housing serving low-income families, sponsored by HACE. Supportive services are provided.
Lehigh Park II	25	Leased/Issued	No	Existing site for families, elderly or disabled sponsored by HACE. Supportive services are provided.
Liberty at Disston	5	Leased/Issued	No	Rehabilitation of nursing home in Northeast Philadelphia sponsored by Liberty Resources. Supportive services are provided.
Liberty Resource	2	Leased/Issued	No	Rehabilitation of development with a preference for disabled seniors in West Philadelphia sponsored by Liberty Resources. Supportive services are provided.
Liberty Welsh	2	Leased/Issued	No	Rehabilitation of nursing home in Northeast Philadelphia sponsored by Liberty Resources. Supportive services are provided.
Los Balcones	21	Leased/Issued	No	Existing site for low-income women and families in North Philadelphia sponsored by Norris Square Association.
Lovell Apartments	10	Leased/Issued	No	Existing housing. Rehab after closing.
LR Ascension Manor	3	Leased/Issued	No	Existing site for low-income seniors in North Philadelphia sponsored by Liberty Resources. Supportive services are provided.
Market West Plaza	10	Leased/Issued	No	Existing housing converted for PB VASH. Rehab after closing.
Martin St	6	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Methodist	11	Leased/Issued	No	Existing site for single women in West Philadelphia sponsored by Methodist Homes. Supportive services are provided.
Monument Village	60	Leased/Issued	No	New construction development for very low-income families in West Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Morton St	2	Leased/Issued	No	Existing site for low-income families in Germantown Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
MPB School Apartments	16	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Mission First Housing Group.
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.

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
New Courtland at Allegheny	40	Leased/Issued	No	New construction development for low-income seniors in North Philadelphia sponsored by New Courtland. Supportive services are provided.
New Courtland at Burholme	35	Leased/Issued	No	Existing project in the Northeast area at 7023 Rising Sun Ave for low-income seniors sponsored by New Courtland.
New Courtland at Cliveden	32	Leased/Issued	No	New construction development for low-income seniors in Germantown sponsored by New Courtland. Supportive services are provided.
New Courtland at St Barts	42	Leased/Issued	Yes	New construction in Northeast Philadelphia for seniors, sponsored by New Courtland. Supportive services are provided.
New Courtland at St. Barts II	48	Leased/Issued	Yes	New Construction in the Northeast section sponsored by New Courtland
Norris Apartments Phase V	45	Leased/Issued	Yes	Choice Neighborhood RAD conversion sponsored by PHA.
Norris CNI Phase II	74	Leased/Issued	Yes	New construction family public housing replacement units sponsored by PHA.
Norris LP	51	Leased/Issued	Yes	Conversion of existing PAPMC public housing development sponsored by PHA.
Norris Square Community Alliance Casas En La Plaza	29	Leased/Issued	Yes	Rehabilitation of existing family units in North Central Philadelphia, sponsored by Norris Square Community Alliance.
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.
Old First House	34	Leased/Issued	Yes	New construction of permanent supportive housing for formerly homeless individuals. Sponsored by Community Ventures.
Parkside 10	41	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Parkside 11	8	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Parkview- Fairhill Phase 1	131	Leased/Issued	Yes	Partial conversion of existing public housing development sponsored by PHA.
Paseo Verde	19	Leased/Issued	No	New construction development 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 are provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
PEC Bernice Elza	6	Leased/Issued	No	New construction development for homeless emancipated teens in West Philadelphia sponsored by Peoples Emergency Center. Supportive services are provided.
PEC Fattah Homes I	6	Leased/Issued	No	New construction development for homeless families with disability in West Philadelphia sponsored by Peoples Emergency Center. Supportive services are provided.
PEC Jannie's Place	17	Leased/Issued	No	New construction development for homeless individuals and families in the Mantua neighborhood of West Philadelphia sponsored by People's Emergency Center. Supportive services are provided.
PEC Spring Garden	9	Leased/Issued	No	Existing site for homeless families with disability in West Philadelphia sponsored by Peoples Emergency Center. Supportive services are provided.
Penrose	10	Leased/Issued	No	Existing site for homeless individuals in South Philadelphia sponsored by CATCH. Supportive services are provided.
Plymouth Hall	53	Leased/Issued	Yes	Existing site for seniors in North Philadelphia, sponsored by PHA.
Powelton Heights	30	Leased/Issued	No	Existing site for seniors in West Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Presby Cantrell Place	40	Leased/Issued	Yes	Substantial rehabilitation development in South Philadelphia for seniors, sponsored by Presbys Inspired Life. Supportive services are provided.
Presby Lindley Court	11	Leased/Issued	No	Rehabilitation site in Logan for seniors sponsored by Presby Inspired Life. Supportive services are provided.
Presby Witherspoon Senior Apts	40	Leased/Issued	Yes	New construction in West Philadelphia serving seniors, sponsored by Presbys Inspired Life. Supportive services are provided.
Preston St	7	Leased/Issued	No	Existing site for low-income families in the West Philadelphia area sponsored by Mission First Housing Group. Supportive services are provided.
Queen Lane	55	Leased/Issued	Yes	Conversion of existing PAPMC development sponsored by PHA.
Queen Row	43	Leased/Issued	Yes	Conversion of existing public housing development sponsored by PHA
Rafael Porrata-Doria Place	30	Leased/Issued	Yes	New construction sponsored by HACE
Ray's Place	17	Leased/Issued	No	New construction development for homeless persons with a serious mental illness in North Philadelphia sponsored by Project Home. Supportive services are provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
Reed St	8	Leased/Issued	No	Existing site for low-income families in South Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Regent Terrace	80	Leased/Issued	No	Existing site for very low-income families in West Philadelphia sponsored by Regent Terrace Housing Partnership.
Reynolds School	49	Leased/Issued	Yes	Adaptive reuse to convert elementary school into housing for homeless veterans sponsored by HELP USA. Supportive services are provided.
Rhawn 2022	28	Leased/Issued	No	Existing project in the Northeast area at 714-718 Rhawn St and 11901-13 Academy Rd for disabled homeless or at risk of homelessness sponsored by Mission First.
Rhawn St 2005	11	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Roberto Clemente House	38	Leased/Issued	Yes	Substantial rehabilitation development in North Philadelphia serving low-income families, sponsored by Nueva Esperanza. Supportive services are provided.
Ruth Street Civic House	44	Leased/Issued	Yes	New construction in Kensington sponsored by NKCDC.
Sandy's/Catherine House	3	Leased/Issued	No	Existing site for homeless individuals in South Philadelphia sponsored by CATCH. Supportive services are provided.
Sartain School	35	Leased/Issued	No	Existing site for seniors in North Philadelphia sponsored by Sartain School Venture.
School of Nursing – Project HOME	50	Leased/Issued	No	Rehabilitation of former nursing school building for homeless individuals sponsored by Project HOME. Supportive services to be provided
Sharswood 1	30	Leased/Issued	Yes	New construction, mixed income development with 60 total units developed by Hunt-Pennrose as part of Sharswood CNI Plan
Sharswood Hunt III	101	Leased/Issued	No	New construction in the Sharswood neighborhood sponsored by Hunt.
Sharswood II	30	Leased/Issued	Yes	New construction in the Sharswood neighborhood sponsored by Hunt. Supportive Services to be provided.
Sharswood Phase 4a	58	Leased/Issued	Yes	New construction in the Sharswood neighborhood sponsored by PHA.
Sharswood Phase 6a	65	Leased/Issued	Yes	New construction in the Sharswood neighborhood sponsored by PHA.
Sheila D Brown Women's Center	9	Leased/Issued	No	Existing site for women with behavioral disabilities in South Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
SIL Program Intercommunity Action	13	Leased/Issued	No	Existing site for individuals with mental health/chemical dependency in Roxborough. Supportive services provided. Sponsored by Inter Community Action
Somerset Station	75	Leased/Issued	No	Existing development designated for low-income individuals and families at Somerset Station
South 55th St LP	18	Leased/Issued	No	Existing site for diverse tenants in West Philadelphia sponsored by Ingerman.
South Phila Scattered	11	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Mission First Housing Group.
Spruce St	3	Leased/Issued	No	Existing site for low-income families in South Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
St John Neumann	52	Leased/Issued	Yes	New construction in South Philadelphia serving seniors, sponsored by Archdiocese of Philadelphia. Supportive services are provided.
St. John Neumann Place	52	Leased/Issued	No	Existing project in the Greys Ferry area at 2600 Moore St for low-income elderly families sponsored by Catholic Housing and Community Services.
Strawberry Mansion	55	Leased/Issued	Yes	New construction in North Philadelphia for low-income families, sponsored by PHA.
Susquehanna Apt	47	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Susquehanna Apts LP.
Susquehanna Square	37	Leased/Issued	Yes	New construction development in North Philadelphia serving low income families sponsored by Community Ventures.
The Dane	50	Leased/Issued	No	Existing development designated for low-income individuals in the Wynnefield area
Thompson St	20	Leased/Issued	No	Existing site for very low-income families in Center City and West Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Tioga Gardens	17	Leased/Issued	No	Existing site for very low-income families in North Philadelphia sponsored by Tioga Gardens Associates.
Venango St	17	Leased/Issued	No	Existing development
Vernon House	58	Leased/Issued	No	Existing project in the Strawberry Mansion area at 3226 Clifford St for low-income elderly/disabled families sponsored by Pennrose Management.
Villas De Caribe	44	Leased/Issued	No	Existing project in the Fairhill area at 161-171 W Allegheny Ave for low-income families sponsored by HACE.

Property Name	# of Project-Based Vouchers	Planned Status at End of FY 2027	RAD?	Description of Project
Villas De Hace	18	Leased/Issued	No	Existing project in the Ludlow area at 1426-44 N 6th St and 1429-31 N Marshall St for low-income families sponsored by HACE.
Walnut Park Plaza	224	Leased/Issued	No	Existing site for low-income seniors in West Philadelphia sponsored by Walnut Park Associates LLC.
Walnut Park Plaza (ADA)	3	Leased/Issued	No	Existing 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 Mission First Housing Group. Supportive services are provided.
WCRP 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 are provided.
WCRP INB Mascher	12	Leased/Issued	No	New construction for women and their families in North Philadelphia sponsored by Women's Community Revitalization Project. Supportive services are provided.
WCRP 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 are provided.
WCRP TNI 1 and TNI 2	21	Leased/Issued	No	Existing site for women and their families in North Philadelphia sponsored by Women's Community Revitalization Project. Supportive services are provided.
WCRP-Grace	36	Leased/Issued	No	New construction development for women and their families in North Philadelphia sponsored by Women's Community Revitalization Project. Supportive services are provided.
West Mill Place	30	Leased/Issued	Yes	New construction sponsored by Gaudenzia
West Park Apartments Initial Phase	110	Leased/Issued	Yes	Partial conversion of existing public housing development sponsored by PHA.
Wingate St	8	Leased/Issued	No	Existing site for low-income families in Northeast Philadelphia sponsored by Mission First Housing Group. Supportive services are provided.
Winter Street	6	Leased/Issued	No	New Construction in Chinatown neighborhood sponsored by PCDC
Total	**5,880**			

v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

In FY 2027, PHA's development initiatives will continue to be guided by development principles and the Opening Doors asset repositioning and expansion strategy approved by the PHA Board. 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 City's H.O.M.E. Program and the 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. PHA collaborated with the City in FY 2023 to update the analysis and goals included in the Assessment of Fair Housing Plan.

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 that are not specifically referenced elsewhere in this Plan, 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 the Opening Doors initiative. In addition, Appendix C 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: Planned Other Changes to MTW Housing Stock Anticipated in the Plan Year

Site	Description of Project
International Market	PHA will develop part of the Sharswood North Lot with the goal of constructing a retail/commercial facility to expand amenities and services to the neighborhood. PHA anticipates commencing construction in FY 2027.
Brooklyn Heights	PHA will continue to pursue the acquisition (PRA) of land in the Mill Creek neighborhood and is working to address complex title issues in order to develop approximately 32 units on the property.
Acquisition/ Redevelopment	PHA will continue to pursue opportunities to preserve and expand affordable housing citywide through acquisition of existing multifamily sites and vacant land utilizing MTW flexibility, Faircloth to RAD, PBV and/or other available methods. As part of this effort, PHA will continue to work to develop or acquire housing developments in the Strawberry Mansion neighborhood, including acquisition of publicly and privately owned parcels in the neighborhood. A new 85-unit development, including 55 rental and 30 homeownership units, is planned for 28th and York. In addition, the Gordon II development consisting of ~57 rental units is planned.
2012 Chestnut Street	PHA plans to develop 121 mixed-income rental units and commercial space at the former PHA headquarters site. Following receipt of HUD approval, PHA demolished the building to make way for construction. PHA anticipates commencing construction in FY 2027.

Site	Description of Project
Vacant Lot Disposition	PHA owns vacant lot parcels across the City. PHA plans to dispose of some of the properties for fair market value to the Land Bank, to a PHA affiliate or alternate means. In partnership with various City Councilmembers and nonprofit affordable housing developers throughout the City, PHA will continue planning and preparations to develop 240 vacant lots and shells into long-term affordable housing with a twenty-year restrictive covenant.
Various Sites - To be determined	PHA continues to actively pursue opportunities to expand affordable housing by utilizing HUD's Faircloth to RAD conversion program. Under this initiative, PHA may enter into partnerships and/or directly develop new public housing that will be converted to PBV assistance upon completion.
Walton School	PHA, in partnership with HELP USA, plans to rehabilitate this former school building into approximately 48 rental units for seniors. The project was awarded a 9% LIHTC by PHFA in the current fiscal year. Construction is projected to commence in FY 2027.
Brewerytown Homeownership Initiative	In 2022, PHA selected four community-based development partners to renovate vacant and distressed scattered sites units in the Brewerytown neighborhood of North Philadelphia. All homes are planned to be sold to eligible low-income families. Families participating in the PHA's Opening Doors to Affordable Homeownership are prioritized for these homeownership opportunities.
West Philadelphia Homeownership Initiative	PHA issued a Request for Proposals to develop affordable homeownership units on scattered sites that were part of a RAD conversion in West Philadelphia.
City Wide Homeownership Initiative	PHA may issue a Request for Proposals to develop affordable homeownership units on scattered sites that were part of a RAD conversion or within its existing portfolio in various sections of Philadelphia.
Ridge Avenue Mixed Use	PHA intends to work with development partners to construct mixed-use buildings on vacant lots/buildings along the 2100 – 2300 blocks of Ridge Avenue.
AME Public Housing Sites	PHA will continue to work with project owner/sponsors of additional AME public housing sites to explore the feasibility of converting from public housing to project-based assistance through the RAD program to ensure long-term preservation of affordable housing units. As part of these efforts, PHA is exploring the feasibility of buying out the limited partners at one or more AME sites including Spring Gardens I and II.
Philadelphia Nursing Home	2100 W Girard Ave in the Fairmount area of Philadelphia is the site of the Philadelphia Nursing Home, which closed its doors in 2022. PHA is proposing to acquire the site from the Commonwealth of Pennsylvania for a multi-use development that will include a hospice facility, assisted living units, and independent living apartments as well as newly constructed townhome-style multifamily units.

vi. General Description of All Planned Capital Expenditures During the Plan Year

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 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 projects for which expenditures may be made during FY 2027. It includes projects funded from MTW funds 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 2027

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Johnson Homes	504 Site Modifications / Fair Hsg	$69,458
Capital Improvements	Richard Allen	504 Site Modifications / Fair Hsg	$11,576
Capital Improvements	Raymond Rosen	504 Site Modifications / Fair Hsg	$52,093
Capital Improvements	Wilson Park - Senior	504 Site Modifications / Fair Hsg	$67,142
Capital Improvements	Harrison Plaza	504 Site Modifications / Fair Hsg	$34,729
Capital Improvements	Arch Homes	504 Site Modifications / Fair Hsg	$9,261
Capital Improvements	Spring Garden Apartments	504 Site Modifications / Fair Hsg	$9,261
Capital Improvements	Queen Lane Apartments	504 Site Modifications / Fair Hsg	$6,367
Capital Improvements	Hill Creek	504 Site Modifications / Fair Hsg	$41,675
Capital Improvements	Abbottsford Homes	504 Site Modifications / Fair Hsg	$27,783
Capital Improvements	Bartram Village	504 Site Modifications / Fair Hsg	$11,576
Capital Improvements	Oxford Village	504 Site Modifications / Fair Hsg	$55,566
Capital Improvements	Whitehall Apartments	504 Site Modifications / Fair Hsg	$10,997
Capital Improvements	Haddington Homes	504 Site Modifications / Fair Hsg	$26,625
Capital Improvements	Champlost Homes	504 Site Modifications / Fair Hsg	$17,364
Capital Improvements	Haverford Homes	504 Site Modifications / Fair Hsg	$2,315
Capital Improvements	Morton Homes	504 Site Modifications / Fair Hsg	$31,256

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Parkview Apartments	504 Site Modifications / Fair Hsg	$1,736
Capital Improvements	Katie B Jackson	504 Site Modifications / Fair Hsg	$11,576
Capital Improvements	College View	504 Site Modifications / Fair Hsg	$18,522
Capital Improvements	Cecil B Moore	504 Site Modifications / Fair Hsg	$5,788
Capital Improvements	Arlene Homes	504 Site Modifications / Fair Hsg	$5,788
Capital Improvements	Gladys B Jacobs	504 Site Modifications / Fair Hsg	$4,052
Capital Improvements	Haddington	504 Site Modifications / Fair Hsg	$69,458
Capital Improvements	Mantua	504 Site Modifications / Fair Hsg	$41,675
Capital Improvements	Kingsessing	504 Site Modifications / Fair Hsg	$98,398
Capital Improvements	Germantown/Hunting Park	504 Site Modifications / Fair Hsg	$104,186
Capital Improvements	Fairhill Square	504 Site Modifications / Fair Hsg	$98,398
Capital Improvements	Francisville	504 Site Modifications / Fair Hsg	$92,610
Capital Improvements	Ludlow	504 Site Modifications / Fair Hsg	$109,974
Capital Improvements	Susquehanna	504 Site Modifications / Fair Hsg	$40,517
Capital Improvements	Strawberry Mansion	504 Site Modifications / Fair Hsg	$97,241
Capital Improvements	Oxford Jefferson	504 Site Modifications / Fair Hsg	$52,093
Capital Improvements	Scattered Sites 901-910	Scattered Site Demolition	$200,000
Capital Improvements	Scattered Sites 901-910	Concrete replacement	$300,000
Capital Improvements	Scattered Sites 901-910	Roofing	$2,253,481
Capital Improvements	Scattered Sites 901-910	Heating Upgrades	$100,000
Capital Improvements	Scattered Sites 901-910	Sitework - Tree Removal	$300,000
Capital Improvements	Scattered Sites 901-910	Sitework - Window Replacement	$100,000
Capital Improvements	Scattered Sites 901-910	Sitework - Painting	$200,000
Capital Improvements	PHA Wide	BAS/SCADA install at remaining sites	$1,432,400
Capital Improvements	PHA Wide	Plumbing Upgrades	$700,000
Capital Improvements	PHA Wide	Ipads	$30,000
Capital Improvements	PHA Wide	Equipment rental	$60,000
Capital Improvements	PHA Wide	Electrical upgrades	$400,000
Capital Improvements	PHA Wide- Equipment	Pipe inspection camera	$14,200
Capital Improvements	PHA Wide- Equipment	Trash truck	$198,000

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	PHA Wide- Equipment	E-vac (1)	$67,348
Capital Improvements	PHA Wide- Equipment	Gator	$49,200
Capital Improvements	PHA Wide- Equipment	Gator snow package(plow and salt spreader)	$14,400
Capital Improvements	PHA Wide- Equipment	Gravely with lawn and snow attachments	$31,200
Capital Improvements	PHA Wide- Equipment	Zero Turn	$30,000
Capital Improvements	PHA Wide- Equipment	Push mowers/lawn equipment	$15,000
Capital Improvements	Abbottsford Homes	Electrical/ Lighting	$30,000
Capital Improvements	Abbottsford	Sitework - Tree Removal	$50,000
Capital Improvements	Abbottsford	Sitework - Playground Replacement	$95,000
Capital Improvements	Arch	Sitework - Fencing	$45,000
Capital Improvements	Arlene Homes	Sitework - Fencing	$45,000
Capital Improvements	Cassie Holley	Landscaping	$15,000
Capital Improvements	Champlost Homes	Sitework - Fencing	$45,000
Capital Improvements	Collegeview	Supplemental Components, Load Center, Single Phase Residential 120/240 V, 100 AMP	$307,800
Capital Improvements	Collegeview	Intercoms	$45,000
Capital Improvements	Haddington Homes	Intercoms	$40,000
Capital Improvements	Hill Creek	Concrete replacement	$1,300,000
Capital Improvements	Hill Creek	Vacuum Steam lines	$1,500,000
Capital Improvements	Hill Creek	Sitework - Tree Removal	$25,000
Capital Improvements	Hill Creek	Sitework - Fencing	$45,000
Capital Improvements	Holmecrest	Window Replacement	$1,000,000
Capital Improvements	Holmecrest	Sitework - Tree Removal	$60,000
Capital Improvements	Katie B Jackson	Fire Suppresion System	$600,000
Capital Improvements	Morton Homes	Rain Leader Replacement	$650,000
Capital Improvements	Morton Homes	Parking Lot Paving	$600,000
Capital Improvements	Oxford Village	Paving	$2,000,000
Capital Improvements	Oxford Village	Window replacement	$2,800,000
Capital Improvements	Oxford Village	Roofs	$1,900,000
Capital Improvements	Queen Lane Apartments	Concrete replacement	$40,000
Capital Improvements	Queen Row	Retaining Wall, Treated Timber	$9,600
Capital Improvements	Queen Row	Retaining Wall, Brick/Stone, Repair	$5,600
Capital Improvements	Queen Row	Exterior Walls, Brick, Repair/Repoint	$374,220
Capital Improvements	Queen Row	Concrete replacement	$40,000

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Raymond Rosen	Sitework - Tree Removal	$25,000
Capital Improvements	Raymond Rosen	Sitework - Fencing	$45,000
Capital Improvements	Raymond Rosen	Flooring, Vinyl Tile (VCT)	$2,205,315
Capital Improvements	Raymond Rosen	Roofs	$1,300,000
Capital Improvements	Raymond Rosen	Exterior Door, Wire Mesh Metal, Gate	$419,900
Capital Improvements	Raymond Rosen	Electrical/ Lighting	$60,000
Capital Improvements	Richard Allen	Sitework - Playground Replacement	$120,000
Capital Improvements	Richard Allen	Replace Roofs	$1,900,000
Capital Improvements	Spring Garden	Electrical/ Lighting	$60,000
Capital Improvements	West Park Plaza	Building Isolation Valves	$220,000
Capital Improvements	West Park Plaza	Re-piping of units - Domestic hot and cold	$880,000
Capital Improvements	Whitehall Apartments	Electrical Upgrades	$95,000
Capital Improvements	Wilson Park	Exterior Walls, Brick, Repair/Repoint	$1,320,000
Capital Improvements	Wilson Park	Concrete replacement	$1,000,000
Capital Improvements	Wilson Park	Sitework - Fencing	$45,000
Capital Improvements	Wilson Park	Electrical upgrades	$100,000
Capital Improvements	Wilson Park	Sitework - Tree Removal	$25,000
ECM	PHA Wide	BAS/SCADA install at remaining sites	$1,432,400
New Development	Strawberry Mansion	Gordon II	$40,164,575
New Development	Fairhill Apartments	Fairhill Phase I	$80,732,800
New Development	Fairhill Apartments	Fairhill Phase II	$87,885,736
New Development	Fairhill Apartments	Fairhill Phase III	$44,583,680
New Development	Westpark Apartments	Westpark Phase I	$164,020,574
New Development	Westpark Apartments	Westpark Phase II	$301,600,000
New Development	2012 Chestnut	2012 Chestnut	$53,000,000
New Development	Bartram Village	Bartram Village Phase I	$41,769,791
New Development	Bartram Village	Bartram Village Phase II	$94,816,799
New Development	20th & Cecil B. Moore	20th & Cecil B. Moore	$36,937,933
New Development	International Market	International Market	$5,500,000
New Development	Mount Olivet	Mount Olivet	$64,157,368
New Development	Suffolk Manor	Suffolk Manor	$63,535,716
New Development	Ridge Avenue Corridor	Ridge Avenue Corridor	$28,173,446
New Development	28th & York	28th & York	$28,173,446
New Development	Walton School	Walton School	$28,913,841
New Development	Cassie Holley	Cassie Holley	$81,600,000
New Development	Johnson Homes II	Johnson Homes II	$178,918,400

Project Type	Site Name	Project Description	Total Estimated Budget
New Development	Johnson Homes III	Johnson Homes III	$48,122,880
New Development	Wilson Park Low-rise II	Wilson Park Low-rise II	$43,008,000
Total			**$1,548,367,106**

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 2027. 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	Johnson Homes	504 Site Modifications / Fair Hsg	$218,965
Capital Improvements	Richard Allen	504 Site Modifications / Fair Hsg	$36,494
Capital Improvements	Raymond Rosen	504 Site Modifications / Fair Hsg	$164,224
Capital Improvements	Wilson Park - Senior	504 Site Modifications / Fair Hsg	$211,666
Capital Improvements	Harrison Plaza	504 Site Modifications / Fair Hsg	$107,659
Capital Improvements	Arch Homes	504 Site Modifications / Fair Hsg	$29,195
Capital Improvements	Spring Garden Apartments	504 Site Modifications / Fair Hsg	$29,195
Capital Improvements	Queen Lane Apartments	504 Site Modifications / Fair Hsg	$19,738
Capital Improvements	Hill Creek	504 Site Modifications / Fair Hsg	$131,379
Capital Improvements	Abbottsford Homes	504 Site Modifications / Fair Hsg	$87,586
Capital Improvements	Bartram Village	504 Site Modifications / Fair Hsg	$35,886
Capital Improvements	Oxford Village	504 Site Modifications / Fair Hsg	$175,172
Capital Improvements	Whitehall Apartments	504 Site Modifications / Fair Hsg	$34,669
Capital Improvements	Haddington Homes	504 Site Modifications / Fair Hsg	$83,936
Capital Improvements	Champlost Homes	504 Site Modifications / Fair Hsg	$54,741
Capital Improvements	Haverford Homes	504 Site Modifications / Fair Hsg	$7,299

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Morton Homes	504 Site Modifications / Fair Hsg	$98,534
Capital Improvements	Parkview Apartments	504 Site Modifications / Fair Hsg	$5,474
Capital Improvements	Katie B Jackson	504 Site Modifications / Fair Hsg	$36,494
Capital Improvements	College View	504 Site Modifications / Fair Hsg	$58,391
Capital Improvements	Cecil B Moore	504 Site Modifications / Fair Hsg	$18,247
Capital Improvements	Arlene Homes	504 Site Modifications / Fair Hsg	$18,247
Capital Improvements	Gladys B Jacobs	504 Site Modifications / Fair Hsg	$12,773
Capital Improvements	Haddington	504 Site Modifications / Fair Hsg	$149,407
Capital Improvements	Mantua	504 Site Modifications / Fair Hsg	$162,010
Capital Improvements	Kingsessing	504 Site Modifications / Fair Hsg	$247,662
Capital Improvements	Germantown/Hunting Park	504 Site Modifications / Fair Hsg	$322,066
Capital Improvements	Fairhill Square	504 Site Modifications / Fair Hsg	$316,582
Capital Improvements	Francisville	504 Site Modifications / Fair Hsg	$298,334
Capital Improvements	Ludlow	504 Site Modifications / Fair Hsg	$327,550
Capital Improvements	Queen Row	504 Site Modifications / Fair Hsg	$127,932
Capital Improvements	Susquehanna	504 Site Modifications / Fair Hsg	$127,729
Capital Improvements	Strawberry Mansion	504 Site Modifications / Fair Hsg	$306,551
Capital Improvements	Oxford Jefferson	504 Site Modifications / Fair Hsg	$164,224
Capital Improvements	Scattered Sites 901-910	Scattered Site Demolition	$600,000
Capital Improvements	Scattered Sites 901-910	Concrete replacement	$600,000
Capital Improvements	Scattered Sites 901-910	Roofing	$4,869,000
Capital Improvements	Scattered Sites 901-910	Heating Upgrades	$200,000
Capital Improvements	Scattered Sites 901-910	Sitework - Tree Removal	$915,000

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Scattered Sites 901-910	Sitework - Window Replacement	$200,000
Capital Improvements	Scattered Sites 901-910	Carpentry	$400,000
Capital Improvements	Scattered Sites 901-910	Sitework - Painting	$400,000
Capital Improvements	PHA Wide	Plumbing Upgrades	$2,135,000
Capital Improvements	PHA Wide	Equipment rental	$183,000
Capital Improvements	PHA Wide	Electrical upgrades	$912,500
Capital Improvements	PHA Wide- Equipment	Pipe inspection camera	$14,200
Capital Improvements	PHA Wide	72" ZERO TURN (Two)	$123,929
Capital Improvements	PHA Wide	three 60" ZERO TURN	$129,356
Capital Improvements	PHA Wide	Landscaping Snow package for Gator :salt spreader and plow(4)	$70,421
Capital Improvements	PHA Wide	Gator with snow package (4)	$285,353
Capital Improvements	PHA Wide	Gator w/o snow package (4)	$278,351
Capital Improvements	PHA Wide	Gravely Tractor, 44" Brush, 36" Finish Mower, 32" Snow Head, & 48" Blade (5)	$161,179
Capital Improvements	PHA Wide	E-vac (2)	$276,128
Capital Improvements	Abbottsford Homes	Electrical/ Lighting	$30,000
Capital Improvements	Abbottsford	Sitework - Playground Replacement	$95,000
Capital Improvements	Arch	Sitework - Fencing	$45,000
Capital Improvements	Arlene Homes	Sitework - Fencing	$45,000
Capital Improvements	Bartram Village	Sitework - Tree Removal	$90,000
Capital Improvements	Cassie Holley	Landscaping	$15,000
Capital Improvements	Champlost Homes	Sitework - Fencing	$45,000
Capital Improvements	Champlost Homes	Casework, Cabinetry, Standard	$76,200

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Champlost Homes	Residential Appliances, Range, Gas	$32,830
Capital Improvements	Champlost Homes	Residential Appliances, Range Hood	$11,200
Capital Improvements	Champlost Homes	Flooring, Vinyl Tile (VCT)-Kitchen	$63,310
Capital Improvements	Champlost Homes	Flooring, Vinyl Tile (VCT)-throughout	$106,395
Capital Improvements	Champlost Homes	Flooring, Vinyl Tile (VCT)-Bathroom	$11,430
Capital Improvements	Champlost Homes	Interior Door, Wood, Hollow-Core Residential	$98,400
Capital Improvements	Collegeview	Supplemental Components, Load Center, Single Phase Residential 120/240 V, 100 AMP	$307,800
Capital Improvements	Emlen Arms	Interior Ceiling Finish, Gypsum Board/Plaster, Prep & Paint	$95,862
Capital Improvements	Emlen Arms	Interior Wall Finish, Gypsum Board/Plaster/Metal, Prep & Paint	$33,089
Capital Improvements	Emlen Arms	Interior Door, Bi-Fold	$14,497
Capital Improvements	Emlen Arms	Tub, Fiberglass, w/ Shower Enclosure	$207,100
Capital Improvements	Emlen Arms	Casework, Cabinetry, Standard	$654,000
Capital Improvements	Emlen Arms	Casework, Countertop, Plastic Laminate	$54,250
Capital Improvements	Emlen Arms	Flooring, Vinyl Sheeting	$2,716
Capital Improvements	Emlen Arms	Flooring, Vinyl Tile (VCT)	$137,565
Capital Improvements	Emlen Arms	Exterior Walls, Brick, Repair	$2,434,080
Capital Improvements	Haddington Homes	Furnace Upgrade	$630,000
Capital Improvements	Hill Creek	Electrical Upgrades - Phase 2	$2,340,000
Capital Improvements	Hill Creek	Roofing	$3,400,000
Capital Improvements	Hill Creek	Sitework - Tree Removal	$76,250
Capital Improvements	Hill Creek	Sitework - Fencing	$45,000

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Hill Creek	Vacuum Steam lines	$1,500,000
Capital Improvements	Hill Creek	Flooring, Vinyl Tile (VCT), Residential In-House Installation	$92,250
Capital Improvements	Hill Creek	Wall Finishes, any surface, Prep & Paint	$188,288
Capital Improvements	Hill Creek	Interior Door, Wood, Hollow-Core Residential	$78,400
Capital Improvements	Hill Creek	Roof Replacement	$1,125,025
Capital Improvements	Holmecrest	Window Replacement	$1,000,000
Capital Improvements	Katie B Jackson	Landscaping	$40,000
Capital Improvements	Katie B. Jackson	Fire Suppression System	$614,768
Capital Improvements	Morton Homes	Flooring, Vinyl Tile (VCT), w/ Asbestos - Bath	$61,408
Capital Improvements	Morton Homes	Flooring, Vinyl Tile (VCT), w/ Asbestos Throughout	$60,376
Capital Improvements	Morton Homes	Flooring, Vinyl Tile (VCT), w/ Asbestos Bedrooms	$455,064
Capital Improvements	Morton Homes	Parking Lots, Pavement, Asphalt, Mill & Overlay	$595,000
Capital Improvements	Morton Homes	Retaining Wall, Brick/Stone	$672,000
Capital Improvements	Morton Homes	Ceiling Finishes, Gypsum Board/Plaster	$399,952
Capital Improvements	Morton Homes	Ceiling Finishes, Gypsum Board/Plaster	$1,200
Capital Improvements	Morton Homes	Retaining Wall, Brick/Stone	$672,000
Capital Improvements	Morton Homes	Exterior Door, Wire Mesh Metal, Gate	$74,100
Capital Improvements	Morton Homes	Exterior Door, Screened Aluminum, Residential	$72,000
Capital Improvements	Morton Homes	Casework, Cabinetry, Standard	$711,000
Capital Improvements	Morton Homes	Exhaust Fan, Residential Bathroom	$38,500
Capital Improvements	Morton Homes	Exhaust Fan, Residential Bathroom	$62,000
Capital Improvements	Morton Homes	Sink/Lavatory, Drop-In Style, Enameled Steel	$225,500

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Morton Homes	Interior Door, Wood, Hollow-Core Residential	$100,800
Capital Improvements	Morton Homes	Interior Door, Wood, Hollow-Core Residential	$285,200
Capital Improvements	Morton Homes	Ceiling Finishes, Textured Spray Coating	$1,266,570
Capital Improvements	Morton Homes	Ceiling Finishes, any flat surface, Prep & Paint	$637,124
Capital Improvements	Morton Homes	Casework, Countertop, Plastic Laminate	$96,450
Capital Improvements	Oxford Village	Window replacement	$2,800,000
Capital Improvements	Oxford Village	Roofing, Modified Bitumen	$693,170
Capital Improvements	Queen Lane Apartments	Concrete replacement	$40,000
Capital Improvements	Queen Row	Retaining Wall, Treated Timber	$9,600
Capital Improvements	Queen Row	Retaining Wall, Brick/Stone, Repair	$5,600
Capital Improvements	Queen Row	Exterior Walls, Brick, Repair/Repoint	$374,220
Capital Improvements	Queen Row	Concrete replacement	$40,000
Capital Improvements	Raymond Rosen	Sitework - Tree Removal	$76,250
Capital Improvements	Raymond Rosen	Sitework - Fencing	$93,763
Capital Improvements	Raymond Rosen	Flooring, Vinyl Tile (VCT)	$2,205,315
Capital Improvements	Raymond Rosen	Exterior Door, Wire Mesh Metal, Gate	$419,900
Capital Improvements	Raymond Rosen	Sitework - Painting Awnings	$300,000
Capital Improvements	Richard Allen	Sitework - Playground Replacement	$120,000
Capital Improvements	Richard Allen	Replace Roofs	$600,000
Capital Improvements	Whitehall Apartments	Interior Wall Finish, Gypsum Board/Plaster/Metal, Prep & Paint	$36,696
Capital Improvements	Whitehall Apartments	Interior Ceiling Finish, Gypsum Board/Plaster, Prep & Paint	$47,607
Capital Improvements	Wilson Park	Sitework - Fencing	$45,000

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Wilson Park	Electrical upgrades	$80,000
Capital Improvements	Wilson Park	Sitework - Tree Removal	$76,250
Capital Improvements	Wilson Park	Concrete replacement	$1,000,000
Capital Improvements	Wilson Park	Low Rise Exterior Door, Wire Mesh Metal, Gate	$851,200
Capital Improvements	Construction / Development	Drone with Camera	$15,000
ECM	PHA Wide	BAS/SCADA install at remaining sites	$1,432,400
New Development	Bartram Village	Bartram Village Phase III	$89,569,200
New Development	Bartram Village	Bartram Village Phase IV	$84,234,049
New Development	Bartram Village	Bartram Village Phase V	$8,000,000
New Development	Cecil B Moore Conventional	Cecil B Moore Conventional	$1,620,000
New Development	Johnson Homes	Johnson Homes	$295,854,080
New Development	Raymond Rosen	Raymond Rosen	$180,768,602
New Development	Harrison Low Rise	Harrison Low Rise	$298,197,287
New Development	Gladys Jacobs	Gladys Jacobs	$3,528,000
New Development	Lucien E. Blackwell I, II, III & Marshall Shepard	Lucien E. Blackwell I, II, III & Marshall Shepard	$12,789,000
New Development	Norris VI	Norris VI	$79,872,000
New Development	Richard Allen III	Richard Allen III	$6,615,000
New Development	Richard Allen Conventional	Richard Allen Conventional	$14,192,640
New Development	Westpark Plaza	Westpark Plaza	$14,192,640
New Development	20th & Glenwood	20th & Glenwood	$166,404,000
New Development	Ludlow	Ludlow	$16,128,000
New Development	Mantua I & II	Mantua I & II	$21,719,040
New Development	MLK IV	MLK IV	$9,031,680

Project Type	Site Name	Project Description	Total Estimated Budget
New Development	Nellie Reynolds Garden	Nellie Reynolds Garden	$13,762,560
New Development	Philadelphia Nursing Home	Philadelphia Nursing Home	$187,000,000
New Development	Queen's Row	Queen's Row	$9,246,720
New Development	Wilson Park Senior Towers	Wilson Park Senior Towers	$143,360,000
New Development	Warnock I & II	Warnock I & II	$20,428,800
New Development	2100 West Girard	2100 West Girard	$101,732,960
New Development	Arch Homes	Arch Homes	$16,558,080
New Development	Bentley Hall	Bentley Hall	$21,504,000
New Development	Emlen Arms	Emlen Arms	$34,191,360
New Development	Haddington	Haddington	$32,256,000
New Development	Haverford	Haverford	$5,160,960
New Development	Katie B Jackson	Katie B Jackson	$12,687,360
New Development	Oxford Village	Oxford Village	$102,400,000
New Development	Arlene Homes	Arlene Homes	$1,728,000
New Development	Champlost	Champlost	$5,508,000
New Development	Collegeview	Collegeview	$2,916,000
New Development	Germantown House	Germantown House	$7,182,000
New Development	Morton	Morton	$13,500,000
New Development	Paschall I & II	Paschall I & II	$21,504,000
New Development	Parkview	Parkview	$1,134,000
New Development	Wilson Park Low Rise	Wilson Park Low Rise	$86,016,000
TOTAL			**$2,193,155,367**

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). Some units in the inventory are not currently available for occupancy including units that: (i) have been approved for demolition or disposition, but the demolition or disposition has not yet taken place; (ii) have been scheduled for significant levels of modernization; (iii) are utilized for administrative or resident services purposes; or (iv) are eligible for other HUD-authorized exclusions. While PHA continues to work with partners to develop new public housing units, the overall size of the public housing inventory continues to decline (and the HCV inventory continues to increase) as units are converted to project-based assistance under RAD including through the Faircloth to RAD initiative.

The Housing Choice Voucher program inventory varies from year to year and includes MTW tenant-based vouchers as well as vouchers authorized by HUD for special purposes such as Veterans Affairs Supportive Housing, Family Unification, SRO Moderate Rehab, Mainstream, and Foster Youth Independence 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. 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 program when eligible.

i. Planned Number of Households Served

Table 7 provides information on households that PHA plans to serve during FY 2027. This includes all households residing in PHA public housing units, households participating in the HCV program, and households served by PHA's local, non-traditional activities. The actual number of households 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 2027 and beyond. RAD vouchers are included in the total Housing Choice Vouchers (HCV) Utilized shown in Table 7. The number of public housing and HCV families served may be affected by the RAD conversion schedule, new public housing unit development schedules, redevelopment activities and other factors.

Table 7: Planned Number of Households Served in FY 2027

Planned Number of Households Served Through:	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to be Served*
Public Housing Units Leased	99,528	8,294
Housing Choice Vouchers (HCV) Utilized**	297,948	24,829
Local, Non-Traditional: Tenant-Based	0	0
Local, Non-Traditional: Property-Based	492	41
Local, Non-Traditional: Homeownership	0	0
Planned Total Households Served	**397,968**	**33,164**

** Actual number of households served through Public Housing and the HCV program may vary based on planned dispositions (outlined in Appendix D) and RAD conversions (outlined in Tables 14 and 15), including the planned conversion of Public Housing scattered site units in AMPs 901-903 and 905-907.*
*** Includes all vouchers in PHA's portfolio, including RAD and SPV programs.*

Table 7A: MTW Local, Non-Traditional Programs

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to be Served
Tenant-Based	N/A	0	0
Property-Based	Shared Housing/MTW 2020-2*	492	41
Homeownership	N/A	0	0

**Planned number of units and unit months are preliminary estimates for MTW Activity 2020-2 and assumes 41 units will be leased for the year.*

ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Housing Choice Voucher (HCV)	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 will continue to conduct outreach and marketing and to provide voucher holders with housing counseling and training before, during, and after moves. PHA has established a target utilization of 88% for MTW vouchers for FY 2027. To support this goal, PHA will continue to provide landlord incentives to increase the supply of units available for leasing including: 1) Housing Opportunity Program (HOP) area signing bonus for owners who submit a RFTA and lease a new unit in an opportunity area (must have poverty rate of <20% and meet other criteria related to jobs, educational and other opportunities); and 2) payments of up to $2,500 for HCV owners to cover vacancy turnaround expenses above and beyond normal wear and tear and not covered by the security deposit.
Public Housing	In order to achieve and maintain 96% in FY 2027, PHA will undertake several initiatives to identify and reduce barriers and delays to filling vacant units. PHA will continue an assessment of the vacancy tracking and applicant referral process in order to eliminate inefficiencies related to this process. PHA will also continue to implement Activity #2005-2 Streamlined Admissions and Transfer Process to reduce turnover in the Public Housing program.

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 2027*

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 Plan Year
Public Housing Units**	First Available and Site-Based	7,765	Partially Open	Yes, if needed
Public Housing Units ***	Site-Based	37,283	Open	Yes
Housing Choice Voucher (HCV) Program	Community-Wide	6,138	Closed	No
PBV/PHA Owned	Site-Based	27,085	Open	Yes

**Table reflects waiting list data as of October 2025.*
***PHA may open the scattered site site-based waiting lists in conjunction with implementation of modified admissions preferences if necessary to ensure a ready pool of qualified applicants.*
****MTW public housing units that also have Low Income Housing Tax Credits and are 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, FYI and Mainstream, 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.

Describe any duplication of applicants across waiting lists:

Applicants may apply for more than one PHA program and appear on more than one waiting list.

ii. Planned Changes to Waiting List in FY 2027

Waiting List	Description of Planned Changes to Waiting List
Public Housing	Site based waiting lists will be established for new public housing developments prior to initial occupancy in accordance with the PHA Admissions and Continued Occupancy Policy.
MTW Housing Choice Voucher Program	Site based waiting lists will be established for new Unit Based Voucher developments, including new/converted RAD developments, in accordance with the PHA Administrative Plan.

III. PROPOSED MTW ACTIVITIES

There are no proposed MTW Activities pending approval in the FY 2027 MTW Annual Plan.

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 2004-1: NEIGHBORHOOD DEVELOPMENT & REVITALIZATION INITIATIVES

Plan Year Approved, Implemented, Amended

- 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 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 Human Services that assists persons transitioning out of nursing homes with accessing affordable housing. As part of NHTI, PHA administers state-supported vouchers and 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.

Under the Nursing Home Transition Initiative, PHA received referrals from the Department of Human Services to assist persons transitioning out of nursing homes with vouchers funded by the Pennsylvania Housing Finance Agency (PHFA). However, DHS ceased providing new applicant referrals as of June 30, 2020. Please note that PHA will continue to provide HCV subsidies to NHTI participants who were referred prior to June 30, 2020.

Public Housing partners with the Philadelphia Corporation for Aging (PCA) and will continue to receive new referrals for the Nursing Home Transition Initiative in FY 2027; their participation in this initiative was not impacted.

Planned Non-Significant Changes

No non-significant changes 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
  - Modified in 2017

- 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
  - Amended FY 2018

- 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 Department's 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 recertification, streamline administrative processes, and reduce paperwork burdens on residents and staff. Simplification and streamlining policies may also be applied to Public Housing households who are living in housing operated by PAPMC, subject to investor approval as needed.

- *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 programs. PHA applies the biennial and triennial recertification policy to VASH participants.

- *Reporting Increases in Income between Regular Recertifications* – With the exception of zero income households, PHA will waive the regulatory requirement for families to report certain increase in income between regular recertifications. Families will only be required to report an increase in income at their next regular recertification.

- *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-based 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 assets of $50,000 or less to self-certify asset value and income from the assets. Asset income is excluded when the value of the household's asset is $50,000 or less. 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 earned income as 100% of the income is excluded. In FY 2024, PHA began implementing a policy to exclude 100% of income which a family receives from a guaranteed income program.

- *Calculation of Income at Regular Recertification* - During regular recertification, PHA will determine income anticipated to be received during the 12-month period following the recertification. With the exception of earned income for Public Housing participants (noted

below), PHA will waive the regulatory requirement to determine the income for the family for the previous 12-month period and use this amount as family income at regular recertification.

- *Verification and Calculation of Earned Income* - PHA is authorized to implement a revised method for verifying and calculating earned income for Public Housing participants. Specifically, PHA will verify and calculate earned income using the last four consecutive quarters in EIV. In cases where earned income is not in EIV or the tenant disputes the earned income calculation, PHA will seek third party verification to verify and calculate income and/or reconcile the difference. PHA will continue to use third party verification for unemployment as well as other sources of income not contained in EIV. Where the working family deduction is concerned, family members who report employment income will self-certify the number of hours they work each week.

- *Verification* - In FY 2024, PHA implemented changes to verification policies for the HCV and Public Housing programs:

  - Applicants and Participants: PHA will accept verification documents dated within 180 days of the date they are provided to PHA.
  - Fixed Sources of Income: Verification documents for fixed income sources will be valid for the full calendar year in which the income is effective. For example, if a Social Security benefit letter is dated February 1, 2022, that benefit letter will be valid for any certification with an effective date in 2022.

  Also in FY 2024, PHA received approval to implement a revised HUD Verification Hierarchy for both HCV and Public Housing programs. PHA's modified Income Verification Hierarchy will allow PHA to rely on any of the third-party verification methods before accepting self-certification. This process will streamline the verification process and allow PHA to repurpose staff time on tasks outside of verification.

Level	Verification Technique	Ranking
1	Upfront Income Verification using HUD's EIV and IVT	Highest (Mandatory)
2	Upfront Income Verification using non-HUD system	Highest (Optional if available and procured by PHA)
3	Written Third Party Verification; Written Third Party Verification Form; or Oral Third Party Verification	High • Supplements EIV and UIV • Also used for: o Non-EIV/UIV reported income sources o Disputes of EIV reported information
4	Tenant Declaration	Low • To supplement EIV when EIV reported sources do not contain verification of the full retrospective period where applicable; or • When tenant cannot produce written third party verification documents.

- *Income Discrepancy* – PHA implemented a policy in the HCV and Public Housing program to increase the verification discrepancy threshold to $5,000. PHA will continue to identify income

discrepancies and take action to process discrepancies which may result in interim or annual correction actions; however, the threshold for the discrepancy will be set at $5,000.

- *Payment Standards* – PHA may establish payment standards up to 120% of the SAFMR 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.

- *Application of Payment Standards* - PHA is authorized to permit an increase in the payment standard to be applied at any time after the effective date of the increase, providing PHA with the flexibility to apply the new payment standard before the next regular reexamination and mitigating any potential negative impact on the family if the contract rent increased between regular reexaminations. Further, PHA will waive the regulatory requirement to apply the increase in payment standard by the one-year anniversary of the increase in payment standard for consistency with the biennial and triennial recertification policy discussed in this activity.

- *Exception Payment Standards* - PHA is authorized to establish exception payment standards for individual units within a SAFMR zip code and remove the 120% limitation for units in neighborhoods undergoing significant revitalization where the SAFMR is not consistent with its property values and rents. In FY 2023, PHA also received approval to establish exception payments standards for specific areas of revitalization, identified by blocks, groups of blocks, or other geographic areas, also removing the 120% limitation for such areas. While all of the units in the zip code with the lower SAFMR may not be in the revitalized area, those that are, would be at a significant disadvantage for inclusion in the HCV program if existing SAFMRs and payment standards were applied. These changes will provide PHA with additional flexibility to establish exception payment standard areas and aligns with PHA's broader strategy to encourage voucher-holders to lease in areas of opportunity and decrease density in high poverty neighborhoods. Exception payment standards will be consistent with market conditions in the surrounding area and prevent financial hardship for those voucher-holders who choose to lease in these areas. As with all other HCV units, PHA will include documentation in the file that the rent is reasonable when setting payment standards outside of the allowable range without HUD approval.

- *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 Utility Allowance (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 may 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 Department's 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. PHA will review and revise the groupings of SAFMR zip codes annually. These revisions are necessary to avoid negative financial impacts on both tenants and owners.

PHA applies the MTW policies included in this activity to the Emergency Housing Voucher (EHV) and the Veteran's Affairs Supportive Housing (VASH) programs.

Planned Non-Significant Changes

In FY 2027, PHA will implement a modified termination policy for HCV families at zero HAP (i.e. the family's total tenant payment (TTP) exceeds the gross rent of the unit) who are participating in the HCV homeownership program or Housing Opportunity Program (HOP). For families participating in these programs, PHA will provide an additional 180 days, for a total of 360 consecutive days at zero HAP, before terminating the family.

PHA will also modify the policy on determining net family assets in the HCV and Public Housing programs in FY 2027. Specifically, PHA will exclude the following when determining net family assets:

- The value of any account under a retirement plan recognized as such by the Internal Revenue Service, including individual retirement arrangements (IRAs), employer retirement plans, and retirement plans for self-employed individuals;
- The value of any Coverdell education savings account under section 530 of the Internal Revenue Code of 1986, the value of any qualified tuition program under section 529 of such Code, the value of any Achieving a Better Life Experience (ABLE) account authorized under Section 529A of such Code, and the value of any "baby bond" account created, authorized, or funded by Federal, State, or local government;
- Equity in property under the Homeownership Option for which a family receives assistance under 24 CFR part 982;
- The value of necessary items of personal property, defined as items essential to the family for the maintenance, use, and occupancy of the premises as a home; or they are necessary for employment, education, or health and wellness. Examples include, but are not limited to, cars/vehicles, furniture, and common appliances;
- Family Self-Sufficiency Accounts;
- Federal tax refunds or refundable tax credits for a period of 12 months after receipt by the family;
- The value of real property that the family does not have the effective legal authority to sell in the jurisdiction in which the property is located;
- Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member arising out of law, that resulted in a family member being a person with a disability;
- The full amount of assets held in an irrevocable trust;
- The full amount of assets held in revocable trust where a member of the family is the beneficiary, but the grantor/owner and trustee of the trust is not a family member;
- Interests in Indian trust land; and,
- Equity in a manufactured home where the family receives assistance under 24 CFR part 982.

Finally, PHA will implement an MTW policy to exclude all student financial assistance from the calculation of income and rent in both the HCV and Public Housing programs. PHA will implement the exclusion of student financial assistance and modified policy for determining net family assets at the family's next regular or interim recertification.

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.

- As modified in the FY 2025 MTW Plan, with the exception of PHA-owned PBV/UBV projects including PHA-owned PBV/RAD projects, PHA may approve rents to owners which are the lowest of 120% of the citywide 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. When determining the initial rent for PHA-owned PBV/UBV projects including PHA-owned PBV/RAD projects, subject to rent reasonableness, PHA may apply the higher of the applicable RAD Rent, 120% of the Small Area Fair Market Rent, or 120% of the citywide Fair Market Rent.

- 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) of PHA's MTW Agreement, 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) of PHA's MTW Agreement, 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 with 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 refer 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 MTW initiatives to the UBV/RAD Program: Rent Simplification, 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. PHA will prepare and implement a local PB HAP contract, PB Tenancy Addendum and Statement of Family Responsibility Form to reflect MTW policies including but not limited to, rent determination methods, recertification frequencies and right to move policies.

- PHA defines a UBV project as a single building, multiple contiguous or non-contiguous buildings, or multiple buildings on contiguous or non-contiguous parcels of land all with a single owner. A single family building is a building with no more than four dwelling units. PHA may elect to combine units that cumulatively meet the definition of a UBV project, but that are covered under more than one Housing Assistance Payments (HAP) Contracts, into a single HAP 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.

PHA has established revised eligibility and rent policies related to the conversion of its Public Housing scattered sites units to the UBV program, which may occur through the Section 18 disposition of public housing units and replacement with Tenant Protection Vouchers, the RAD conversion process or a Section 18/RAD blend. Specifically, PHA will apply the following policies for households occupying Public Housing scattered site units at the time they are converted through either Section 18 or RAD:

- At conversion, PHA will not re-screen households for eligibility in the HCV program. Current households will be grandfathered for application of any eligibility criteria to

conditions that occurred prior to the conversion, but will be subject to on-going eligibility requirements of the UBV program. If the current household moves out after conversion, any family that leases the unit thereafter will be subject to UBV eligibility requirements at initial and during continued occupancy.

- PHA will place units under HAP contract for current households whose total tenant payment (TTP) exceeds the gross rent of the unit. Current households whose TTP exceeds the gross rent will be required to pay the gross rent or the maximum rent under LIHTC, if applicable, while leasing the converted unit. If the current household moves out after conversion, PHA will only lease the unit to a family who is eligible for housing assistance payments and whose total tenant payment (TTP) is below the gross rent for the unit.

- If, at conversion, the current household is considered over-housed or under-housed under PHA's subsidy standards, the current household will be permitted to remain in the converted unit until an appropriately sized unit becomes available within converted project. Once an appropriately sized unit is available, the current household must move within a reasonable amount of time, as determined by PHA. Households who are admitted after the conversion will be subject to PHA's subsidy standards at initial occupancy.

- If, as a result of the conversion, the current household's monthly rent will increase by more than the greater of 10 percent or $25, the rent increase will be phased in over three (3) years. If a current household was paying ceiling rent immediately prior to conversion, PHA will use the ceiling rent amount to calculate the initial (Year 1) phase-in amount.

Please note that modified eligibility and rent policies detailed above will not apply to families who are admitted and move into these units after conversion.

In FY 2027, PHA plans to enter into UBV contracts for 68 multifamily housing developments with a total of 5,015 affordable rental units. Additionally, PHA may issue requests for proposals, conduct evaluations, and recommend additional units and developments for approval by the PHA Board.

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

Planned Non-Significant Changes

In FY 2027, PHA will implement a modified MTW policy for the maximum number of UBV units, in order to unit-base more than 20% of its authorized voucher units. Accordingly, PHA will also waive regulatory requirements related to program caps and excepted units, including performing an analysis of impact if PHA opts to project-base 50% or more of its authorized voucher units.

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 transfers from Public Housing to the Housing Choice Voucher Program and vice versa. These transfers are referred to as MTW transfers. PHA may provide up to 100 transfers between the Public Housing Program and the HCV Program annually.

- *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; however, PHA notifies the family that 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 public housing 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 public housing waiting lists and they will not be eligible for selection.

PHA may allocate homeownership vouchers for Public Housing residents who graduate from the Jobs Plus program and transfer these residents from the Public Housing to HCV Homeownership program. Graduates will be required to complete the homeownership-counseling courses and meet other eligibility requirements for receiving a homeownership voucher.

PHA applies the MTW flexibilities included in this activity to the Emergency Housing Voucher (EHV) program.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2005-3: PROGRAM EFFICIENCIES
(formerly 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 designed to simplify processing and streamline administrative processes. This activity includes:

- *Restriction on Elective Moves* – Families participating in the HCV program 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 require 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, for use in the HCV and Public Housing programs.

As part of the Local Forms initiative, PHA combined the HUD-9886 Authorization for the Release of Information/Privacy Act form with the PHA Authorization of Release Form in order to reduce redundancies and streamline the verification process by reducing the number of signatures required and allowing the household to sign electronically. PHA also developed a local PBV HAP Contract and Tenancy Addendum, consistent with MTW policies approved under Activity 2004-3: Unit-Based Leasing and Development Program; and a modified local Contract of Participation for the Family Self-Sufficiency (FSS) program, which incorporates the approved MTW policies for the FSS program outlined in Activity 2020-1: Local Family Self-Sufficiency Program Flexibility.

To simplify the leasing process, PHA has developed a local Request for Tenancy Approval, which incorporates MTW policies and requests information required to complete the leasing process.

PHA also developed a local tenant-based HAP Contract and Tenancy Addendum as part of the Local Forms initiative. The new HAP contract is integrated in the PHA's landlord portal system to streamline and expedite the leasing process.

PHA applies the MTW flexibilities included in this activity to the Emergency Housing Voucher (EHV) program.

Planned Non-Significant Changes

No significant changes are planned.

Planned Significant Changes

No significant changes are planned.

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 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 2027, PHA projects that 1,460 additional public housing units will be developed by PHA development partners at 20 properties. See Table 1 for additional detail on planned developments and units. As noted in the Table 1 narrative, some or all of these developments/units may be converted to Project Based Assistance through the Faircloth to RAD initiative or the RAD transfer of assistance provisions. Due to changes to development financing and construction schedules, the projects listed in Table 1 include some projects that were listed in prior MTW Annual Plans, but which have not yet been completed. The actual number of units that are 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 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
- Modified FY 2022

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 2024, PHA increased the number of tenant-based vouchers allocated to the STAR and RISE programs to 30 vouchers due to the success of these programs in assisting returning citizens in their transition. PHA may provide for an extension to the two-year term for the STAR/RISE programs; extensions are granted on a case-by-case basis and evaluated based on the participant's individual circumstances.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2019-1: OPENING DOORS TO AFFORDABLE HOMEOWNERSHIP

Plan Year Approved, Implemented, Amended

- Approved FY 2019
- Implemented in FY 2019

Description/Update

PHA will continue to utilize MTW 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 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.

In FY 2027, PHA anticipates that 20 residents will purchase a home through the Public Housing mobility program, 10 residents will purchase their scattered site units under the 5h program, and 20 current voucher holders will utilize 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 over 1,000 residents to purchase their first homes. PHA will continue to work with 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 requirements, 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. 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 is authorized 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.

- *Rehabilitation of Scattered Sites Units* – Leveraging the Federal Housing Administration's 203(k) Rehabilitation program, PHA may offer down payment and soft second mortgage assistance to PH residents and HCV participants who purchase and rehabilitate select scattered site units. With a Section 203(k) insured loan, PH residents and HCV participants will be able to finance the rehabilitation of the unit. PHA will qualify and connect residents with MBE/WBE contractors as well as resident-owned contracting companies to facilitate the rehabilitation. During the period of rehabilitation, HCV and PH participants will continue to receive assistance in their existing (non-homeownership) PH or HCV units until rehabilitation work is complete and the homeownership unit is ready for move-in.

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 mortgage 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 down-payment and/or closing cost assistance programs.

PHA will continue to partner with the "Turn the Key" program, a part of the City's Neighborhood Preservation Initiative to build more than 1,000 new, energy-efficient, three-bedroom homes on publicly owned land. Residents that are part of PHA's homeownership pipeline will be encouraged to enroll in the program so that they can compete for Turn the Key units. PHA residents will receive first preference for any homeownership units that are built on land which PHA transferred to the City Land Bank and will be eligible for PHA grants up to $50,000 and City grants up to $25,000.

PHA budgets up to $1.5 million in MTW 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

During FY 2026, PHA ceased new enrollments in the Public Housing 5h program. As described in the discussion of planned affordable housing preservation and development initiatives, PHA plans to convert its scattered site Public Housing units to the PBV program in order to improve conditions and ensure their long-term affordability. Accordingly, PHA will remove the discussion of the Public Housing 5h program from this activity. However, PHA will continue to serve Public Housing families through the PH Mobility program. PHA will also discontinue the portion of this activity which permits families to purchase and rehabilitate scattered sites units using an FHA Section 203(k) insured loan.

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 funding flexibility to support programs designed to help improve educational outcomes and high school graduation rates for PHA youth living in the Sharswood/Blumberg neighborhood of Philadelphia. Through this activity, PHA 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 funds to support programming and case management services for students in grades 9-12 who attend the neighborhood school, which is operated by Big Picture Schools Philadelphia (BPSP) and located in the Vaux Community Building. MTW funding is provided for BPSP students who are part of a PHA HCV or Public Housing family. BPSP works to engage students in learning and internship opportunities to encourage career exploration and progression to higher education.

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 EnVision Center is located in the Vaux Community Building and includes services such as health and wellness, job training, high school education and after-school programs. 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 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 youth exceed citywide educational metrics, and to graduate and move onto higher education and meaningful careers. In FY 2027, PHA anticipates serving 140 PHA youth through this activity.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Significant Changes

No significant changes are planned.

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

Plan Year Approved, Implemented, Amended

- Approved FY 2020
- Implemented in FY 2020
- Modified in FY 2021
- Modified in FY 2024

Description/Update

PHA will continue to implement a revised Family Self-Sufficiency (FSS) model, the PHA Advantage FSS program. In FY 2024, PHA received approval for this revised FSS program model which incorporates important changes to how participating families earn escrow, in order to encourage broader participation in FSS and incentivize educational goals and greater engagement in case management. This revised model will include the following program components:

Revised Escrow Model
In order to encourage families of all income levels to participate in the FSS program, PHA will establish an escrow model in which the monthly escrow amount is determined by the family's annual earned income, rather than the change in their Total Tenant Payment (TTP). As shown in the table below, the family will receive escrow according to income tiers; the family must earn at least $3,500 in order to begin escrowing savings.

Annual Earned Income		Monthly Escrow Amount
$0	$3,499	$0
$3,500	$6,499	$50
$6,500	$9,499	$75
$9,500	$12,499	$100
$12,500	$15,499	$125
$15,500	$18,499	$150
$18,500	$21,499	$175
$21,500	$24,499	$200
$24,500	$27,499	$225
$27,500	$30,499	$250
$30,500	$33,499	$275
$33,500	$36,499	$300
$36,500	$39,499	$325
$39,500	$42,499	$350
$42,500	$45,499	$375

Annual Earned Income		Monthly Escrow Amount
$45,500	$48,499	$400
$48,500	$51,499	$425
$51,500	$54,499	$450
$54,500	$57,499	$475
$57,500	$60,499	$500
$60,500	$63,499	$525
$63,500	$66,499	$550
$66,500	$69,499	$575
$69,500	$72,499	$600
$72,500	$75,499	$625
$75,500	$78,499	$650
$78,500	and up	$675

If the family's earned income decreases below $3,500 during their participation, they will no longer receive escrow. However, if the family's earned income later increases and meets or exceeds $3,500, they will again receive escrow.

PHA may make modifications to factors in the revised escrow model such as earned income bands and escrow amount in future fiscal years in order to meet FSS program objectives.

Incentives

PHA will provide incentives for participants who meet interim goals in order to encourage continued participation in the FSS program and commitment to ITSP goals. Incentive payments will be made with the final escrow disbursement; however interim incentives may be paid at the time the goal is achieved if and when the family provides justification of the need for the disbursement to support one of their FSS goals.

- $150 for completion of a GED or receipt of a high school diploma
- $150 for completion of a job training or skills development program, approved by PHA or their designated FSS contractor
- $250 for obtaining the skilled trade or job-specific certification, such as those required for pharmacy assistants or construction trades and approved by PHA (or their designated FSS contractor)
- $250 for completion of an Associate's degree (one-time limit per person)
- $500 for completion of a Bachelor's or Master's degree (one-time limit per person).

In addition to the interim incentives listed above, PHA will also provide an incentive of up to $2,000 to recent program graduates who purchase a home within two (2) years of completing the PHA Advantage FSS program. To qualify for this homeownership incentive, the graduate must complete a homeownership course and/or counseling approved by PHA. This incentive may be used for down payment and/or post-purchase expenses; PHA will provide this incentive to qualifying graduates in addition to their final escrow disbursement. Accordingly, PHA will not count the homeownership incentive against the cap on total escrow.

PHA will also establish an incentive payment of $5,000 for FSS graduates that choose to terminate their assistance in the Public Housing or HCV program within two (2) years of completing the FSS Program.

PHA will use FSS escrow forfeitures to fund the incentives described above, including interim incentives for current FSS participants as well as self-sufficiency and homeownership incentives for FSS graduates. PHA will continue to comply with the regulatory requirements for monthly reporting of FSS escrow forfeitures on Form HUD-52681-B.

Contract Term
Using its MTW flexibility, PHA will initiate the five-year term at the execution (effective date) of the CoP. The change in contract term is necessary to conform with other proposed changes which will allow participants to escrow upon execution of their CoP, rather than after their first recertification of income.

Transition
PHA will provide families who enrolled in the FSS program before FY 2024 with the opportunity to benefit from the changes outlined above. PHA will notify existing families of the program changes and offer the opportunity to sign a modified Contract of Participation (CoP), which includes the program components listed above, or to continue with their existing CoP. The revised escrow model and interim incentives described above will not be retroactive for FSS families who enrolled before FY 2024 and who opt to sign a modified CoP.

In FY 2027, PHA anticipates that approximately 100 new families will enroll, resulting in a total enrollment of approximately 700 families into the MTW FSS Program.

Planned Non-Significant Changes

In partnership with Compass Working Capital, PHA may implement a pilot program in FY 2027 to automatically enroll families at select Public Housing properties in the FSS program. Compass Working Capital will offer financial coaching and asset building services to participating families and PHA will continue to administer their FSS escrow accounts. The goal of the pilot program is to increase the reach of the FSS program, to include families who may otherwise not participate, and to improve the economic outcomes for these families.

Families in the pilot program will be permitted to opt-out of the FSS program. PHA will report on the outcomes of this pilot program in the FY 2027 MTW Report.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2020-2: SPONSOR-BASED SHARED HOUSING PILOT

Plan Year Approved, Implemented, Amended

- Approved FY 2020
- Implemented in FY 2020

Description/Update

Under this activity, PHA will continue to implement a new pilot program to expand housing options for homeless individuals and other hard to serve special populations, which builds on and enhances the ongoing collaboration between the City and PHA to reduce homelessness through the "Blueprint to End Homelessness" initiative.

The pilot program initially involved a shared housing model which included twenty-five (25) units in partnership with the City. PHA subsequently expanded the pilot program with the City to include an additional ten (10) units and entered into a new partnership with the Community College of Philadelphia (CCP) to serve up to sixteen (16) at-risk, low-income students, providing housing opportunities in scattered site units located within walking distance of CCP. To support the stability and success of students, PHA has partnered with the Drueding Center, a local non-profit with experience supporting families who are homeless or at-risk of homelessness, to provide case management and other services to CCP students residing in the partnership units.

In FY 2025, PHA expanded the pilot program to include 41 total units, including 35 units with the City and six (6) units with CCP. Based on an evaluation of the program's effectiveness in reducing homelessness and providing stable housing for participants, PHA may elect to further expand the program and the number of units. The elements of the pilot program include:

- Utilizing 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 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. PHA will request HUD approval to classify the units covered under this pilot program 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. Participants will not be subject to public housing Community Service requirements. However, participants will be subject to admissions and continued occupancy policies established by the City or Sponsor Agency with whom PHA has entered a master lease agreement.

- Lease enforcement (up to and including evictions), house rules enforcement, rent collection and other property management activities will generally be the responsibility of the City or Sponsor Agency.

- 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 with quarterly reports that provide basic data on program participants including household income, dates of occupancy, supportive services provided, outcomes achieved and other required information.

Based on negotiations with the City and/or Sponsor Agency, PHA may elect to adopt an expanded role and assume responsibilities in addition to those that are described above.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2021-1: LIMITED PILOT - MTW CONTINUED OCCUPANCY POLICY

Plan Year Approved, Implemented, Amended

- Approved FY 2021
- Implemented FY 2024

Description/Update

In FY 2021, PHA received HUD approval to implement a pilot program to require work-able adults residing in select PHA developments to work or participate in an education or job training program. Recognizing the health and financial impact of the COVID-19 pandemic on low-income families, PHA paused plans to implement the pilot program. PHA resumed planning and completed implementation of the pilot program in FY 2025, with ample services and hardship protections to ensure that families have the capacity and support to comply with the new requirements.

This pilot program will not apply to PHA residents or HCV participants admitted before the implementation of this activity. To support and provide incentives for employment and self-sufficiency, PHA has established an MTW continued occupancy policy applicable to new residents at a limited number of target developments and units. The policy requires all non-disabled adults aged 18-54 in the household to complete at least 20 hours per week of employment – or participate in an approved education or job training program - as a condition of continued occupancy. Elderly and disabled adults, household members who become elderly or disabled and household members who are caretakers of elderly/disabled family members are exempt from the continued occupancy requirement. To support residents in achieving compliance, households are referred and provided with supportive services, as needed, to PHA's new Workforce Center, where they are able to work with a PHA Navigator to identify and secure employment, training and supportive service placements and referrals to PHA partner agencies.

The policies for the pilot program apply only to households that are *newly admitted or transferred* to: 1) Public Housing scattered site units; 2) PHA owned or controlled non-RAD PBV developments; and 3) Turnover units, and units available at initial occupancy for which there are no public housing conversion households with a right to return, in PHA-owned or controlled PBV RAD developments. Households who have a right to return to a RAD development will continue to be offered units before any new admission and will <u>not</u> be subject to the continued occupancy work requirement.

In tandem with the pilot program, PHA has established an admissions and transfer preference applicable only to the above-listed target units and development. The admissions and transfer preference, which does not require MTW waivers from HUD, is assigned to eligible applicant households where at least one adult is working 20+ hour per week or participating in an education or job training program. Eligible elderly (55+) and disabled applicants are also assigned this preference.

A household member who has a short-term medical issue or disability, or who is responsible for the care of a child under age six and is unable to secure appropriate childcare, which prevents the member from fulfilling the work (or education or job training program) requirement will be allowed to request a temporary hardship exemption subject to third party verification of the hardship.

PHA will review the results of the pilot program before making any decisions regarding expanding the policy to additional sites or units. PHA will provide information on any proposed changes to the policy in future MTW Annual Plans.

Families admitted or transferring to impacted developments will be informed of the continued occupancy work requirement and referred to PHA's Resident Programs and Partnerships (RPP) division for an orientation to learn more about the programs and services offered by PHA and its partners. RPP will meet with the family to review their needs and challenges, and to identify strategies to help ensure that all non-exempt family members are able to comply with the continued occupancy requirement. Non-exempt family members who do not meet the requirement at lease-up will be required to work with RPP to enter into an action plan for the resident to come into compliance within 180 days.

Planned Non-Significant Changes

No significant changes are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2022-1: EMERGENCY WAIVERS

Plan Year Approved, Implemented, Amended

- Approved FY 2022
- Implemented in FY 2022

Description/Update

PHA will use MTW flexibility to establish emergency waivers during economic and health related emergencies and natural disasters as declared by the Mayor or his/her designee. This activity allows PHA to waive and/or adopt alternative requirements should they be needed in order to relieve burdens on all stakeholders, including low-income families participating in PHA's Public Housing and HCV programs.

1. **Delayed Reexaminations:** PHA may waive the requirement to conduct a reexamination of family income and composition at least annually. Where reexaminations have been delayed, PHA will complete the reexamination no later than the anniversary month of the following year. The next reexamination will be scheduled on the same anniversary month using the applicable reexam frequency for the family. For example, if a biennial reexam was due on April 2022, PHA would complete the reexam by April 2023. The next scheduled biennial reexam would take place in April 2025. This waiver applies to the PH and HCV programs.

2. **Verification of Income:** PHA may waive the requirements of the verification hierarchy and continue to use Enterprise Income Verification (EIV) to confirm tenant income at both interim and regular recertifications, unless specifically waived by HUD. This waiver applies to the PH and HCV programs.

3. **Increase in Payment Standard:** PHA may waive the requirement to apply the increased payment standard back to the regular effective date for delayed regular reexaminations. Instead, during periods of declared emergencies, PHA will apply the increased payment standard at the next interim reexamination after the effective date of the increased payment standard. If PHA completes a reexam late, PHA will apply the payment standard in effect on the effective date of the delayed regular reexamination. This waiver applies to the HCV program.

4. **Delayed Regular HQS Inspections:** PHA may waive the requirement for completion of regular HQS inspections at least biennially. Where a regular HQS inspection has been delayed, PHA will complete the HQS inspection no later than the anniversary month of the following year. The next HQS inspection will be scheduled on the same anniversary month using the applicable inspection frequency for the unit. For example, if an HQS inspection was due on July 2020, PHA would complete the inspection by July 2021. The next scheduled annual HQS inspection would take place in July 2022. PHA will continue to request a self-certification from the owner that no life threatening conditions exist in the

unit. Additionally, PHA will continue to conduct complaint inspections. This waiver applies to the HCV program.

5. **Interim HQS Inspections:** PHA may waive the requirement to conduct re-inspections to confirm repair; however, PHA will require that the owner self-certify and provide documentation that a life-threatening deficiency has been corrected within 24 hours of notification and that a non-life-threatening deficiency has been corrected within 30 days of PHA notification. This waiver applies to the HCV program.

6. **HQS QC Inspections:** PHA may waive the requirement to conduct HQS quality control inspections and instead will suspend HQS quality control inspections until the emergency waiver has been lifted. This waiver applies to the HCV program.

7. **Homeownership HQS:** PHA may waive the requirement for the initial HQS inspection for homeownership units; however, an independent professional inspection will still be required. This waiver applies to the HCV Homeownership Program.

8. **Delayed PH Annual Self-Inspection:** PHA may waive the requirement to complete annual self-inspections of PH units. Where self-inspections are delayed, PHA will continue to respond to and address serious conditions that could jeopardize life or property. Additionally, if self-inspections are delayed, PHA will resume self-inspections once the waiver is lifted beginning with the units which were inspected on the oldest date. PHA has not yet implemented the waiver and continues to perform required self-inspections; however, PHA will reserve the right to apply this waiver in the upcoming fiscal year. This waiver applies to the PH program.

9. **FSS Contract of Participation:** PHA may waive the requirement regarding the maximum extension of an FSS Contract of Participation (COP). During periods of declared emergency, PHA may extend a family's COP, using the declared emergency as good cause of the need for extension. For households who were already in the two year extension period when the emergency was declared, PHA may extend their COP beyond the two year extension threshold. This waiver applies to the PH and HCV FSS program.

PHA will report on those emergency waivers implemented in the FY 2026 MTW Report in the event of a natural disaster, economic, or health related emergency.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2025-1: ALTERNATIVE INSPECTION SCHEDULE

Plan Year Approved, Implemented, Amended

- Approved FY 2025
- Implemented in FY 2025

Description/Update

PHA has implemented an alternative inspection schedule for select HCV units based on an assessment of the age, property/unit condition, quality of property management and/or other relevant factors for individual units and buildings under a Housing Assistance Payment contract. Alternative inspections will require that eligible units meet Housing Quality Standards (HQS) and be inspected at least once every three years. PHA anticipates that this activity will continue to incentivize owners and participants to maintain units in compliance with HQS and reduce staff time associated with inspecting high-quality units.

All HCV participants and owners will continue to be able to request a complaint inspection at any time in accordance with PHA's Administrative Plan. Additionally, PHA will reserve the right to revert the inspection cycle to biennial for a unit or building at any time. HUD shall continue to be able to conduct or direct PHA to conduct inspections at any time for health, safety and/or accessibility purposes.

The alternative inspection schedule may be applied to units in the tenant-based and unit-based program based on PHA's assessment of the age, property and/or unit condition, quality of property management and/or other relevant factors. In FY 2026, PHA will apply the flexibility to inspect units once every three years to UBV units owned by PHA or a PHA affiliate. Additionally, PHA may expand the application of this flexibility to tenant-based and unit-based vouchers for units and properties that were recently built, including new construction.

In FY 2026, PHA expanded this activity to include the flexibility to conduct pre-inspections. PHA will approve an assisted tenancy and execute the HAP contract if the unit passed pre-inspection within 90 days of the move-in date. If a Request for Tenancy Approval (RFTA) is submitted after the 90-day period has elapsed, PHA will conduct another inspection.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2025-2: EXPANDING HOUSING OPTIONS FOR VETERANS

Plan Year Approved, Implemented, Amended

- Approved FY 2025
- Implementation Planned for FY 2027

Description/Update

PHA will implement a limited pilot program to provide a broader range of housing options to eligible elderly and disabled veterans. In coordination with the national and local Veterans' Affairs offices, PHA has worked to identify unmet housing needs among the local population of elderly and disabled homeless veterans. As a result, PHA and the VA found elderly and disabled homeless veterans in need of housing which offers meals/dining services and assistance with performing daily activities. The pilot program outlined in this activity is based on PHA's discussions with the local VA, which endorses and supports this concept.

PHA will expand the housing options available to elderly and disabled veterans assisted through the Veterans Affairs Supportive Housing (VASH) program in order to address the unmet needs of this population. PHA will permit eligible VASH participants to use their tenant-based voucher to reside in a personal care home or similar settings, in which bedrooms, bathrooms, and/or living areas may be shared among a limited number of eligible participants. Personal care homes and similar settings eligible under this activity must be accessible and offer meals and dining services, assistance with performing daily activities, and other supportive services.

Under this activity, PHA may establish a payment standard which exceeds 120% of the applicable FMR for tenant-based VASH participants residing in a personal care home or similar housing. Housing assistance will be limited to rent; PHA will not provide assistance for expenses or services outside of rent.

For tenant-based VASH participants residing in a personal care home or similar settings, PHA will exclude Aid and Attendance Benefits from the VA when calculating the participant's income and tenant rent portion. PHA anticipates that all VASH participants eligible under this activity currently receive Aid and Attendance Benefits, which will be paid directly to the personal care home to cover expenses not covered by the housing assistance provided by PHA, such as meals and supportive services.

During the initial year of implementation, PHA will limit the program to 12 participants. PHA will assess the pilot program and its parameters after the initial year.

As noted above, PHA will apply the approved MTW flexibilities under this activity to the Veteran's Affairs Supportive Housing (VASH) program.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Significant Changes

No significant changes are planned.

ACTIVITY 2025-3: EXPANDING AFFORDABLE HOUSING OPPORTUNITIES THROUGH ACQUISITIONS

Plan Year Approved, Implemented, Amended

- Approved FY 2025 Plan Amendment
- Implemented in FY 2025

Description/Update

PHA has established strategic goals to preserve or redevelop its current portfolio of approximately 13,000 public housing units and to add up to 7,000 affordable housing units to the portfolio utilizing Faircloth to RAD, Unit Based Vouchers, MTW Local Non-Traditional Housing Development and other available program tools and methods. To accomplish the goal to increase the number of affordable housing units, PHA or its affiliate(s) will acquire existing multifamily properties and vacant land throughout the City of Philadelphia to preserve housing that currently serves low-income families and/or to make available new housing for low-income families in neighborhoods that offer economic opportunities and other amenities. The cost of acquiring existing multifamily housing is substantially lower than the cost of new development undertaken directly by PHA or its affiliates. Pursuant to this activity, PHA may utilize MTW funds and reserves, collectively "MTW Funds", to acquire:

- Expiring LIHTC properties and/or properties with expiring affordable use restrictions;
- Other multifamily properties located in opportunity areas that are being sold at or below market value; and,
- Mixed-use, mixed-income or market rate housing in opportunity neighborhoods.

Determinations on the specific properties to be acquired will be opportunity-driven and based on PHA's ongoing evaluation of market opportunities including foreclosure sales. At the time of acquisition, properties may be fully or partially occupied or vacant (including vacant land) and may require various levels of rehab or new development. Prior to entering into a Housing Assistance Payments Contract for some or all housing units within an acquired property, PHA or its affiliate may undertake necessary rehabilitation or development and provide property management services utilizing MTW Funds. However, MTW Funds will only be utilized for units either currently housing low-income families or that are vacant and targeted for future occupancy by low-income families.

Since inception of this activity through March 2026, PHA has acquired the following properties and vacant land/lots.

Property Name	Property Description	# of Units	Acquisition Price
Brith Sholom	Located in the Wynnefield neighborhood, 19131 zip code. Includes studios and one-bedroom units.	356*	$24,000,000
The Dane Apartments	Located in the Wynnefield neighborhood, 19131 zip code. Includes studios, one-, and two-bedroom units.	231	$51,000,000
The Legacy at Powelton Village	Located near Drexel University, 19104 zip code. Includes one- and three-bedroom units.	30	$6,000,000
UCity Flats	Located in the University City neighborhood of West Philadelphia, zip code 19104. Includes four-bedroom units.	44	$14,000,000
Birchwood at Grays Ferry *(formerly St. Anthony's)*	Located in the South Philadelphia area, zip code 19146. Includes senior and family units with a mix of one-, two, three- and four-bedroom units.	53	$5,810,000
The Greene Manor	Located in the Mt. Airy Germantown area, zip code 19144. Includes studio, one-, two- and three-bedroom units situated in four developments.	381	$75,900,000
Somerset Station	Located in Port Richmond neighborhood, zip code 19134. Includes studio, one-, two- and three-bedroom units.	220	$58,080,000
Thompson Street	Located in the Brewerytown neighborhood, zip code 19121. Includes three-bedroom units	8	$1,760,000
Harmony	Located in 19146 zip code. Includes one-, two- and three-bedroom units.	19	$4,800,000
Grove	Located in the Grays Ferry neighborhood, 19146 zip code. Includes two- and three-bedroom units.	5	$1,200,000
Wister Court	Located in the historic Germantown neighborhood, 19144 zip code. Includes one-, two- and three-bedroom units.	49	$13,100,000
S 47th & Woodland Avenue	Located near University of Pennsylvania and St. Joseph's University in the 19143 zip code.	22	$7,650,000
Chelten Terminal	Located in the Germantown Penn Knox neighborhood, zip code 19144. Includes studio, one- and two-bedroom units.	45	$ 8,640,000
Salmon Street	Located in the Port Richmond neighborhood, zip code 19134. Includes studio, one-, two-, and three-bedroom units.	52	$ 8,700,000
Avenue V	Located in the South Kensington neighborhood, zip code 19122. Includes studios and one-bedroom units for seniors	200	$49,200,000
2413-17 and 2431-33 Thompson Street	Land/vacant lots located in the Sharswood neighborhood, zip code 19121.	TBD	$300,000
226 Chelten Avenue	Land/vacant lot located in the East Oak Lane neighborhood, zip code 19120.	TBD	$1,000,000

Property Name	Property Description	# of Units	Acquisition Price
1325 Point Breeze	Vacant commercial property located in the Point Breeze neighborhood, zip code 19146.	TBD	$2,310,000
TOTAL		**1,715**	**$333,450,000**

** The unit count for Brith Sholom reflects the unit count at the time of acquisition.*

PHA will continue to pursue additional acquisitions in FY 2027 and provide details on actual acquisitions and funded activities in the MTW Annual Reports. PHA is currently evaluating the feasibility of acquiring the properties listed below in FY 2027. Please note that some of the properties listed below may be converted to RAD under Restore-Rebuild (formerly Faircloth to RAD).

Property Name	Property Description	# of Units	Acquisition Price *Est./Actual**	Acquisition Date *Est./Actual**
Bernice Arms Apartments	Located in the Angora neighborhood and next to Cobbs Creek Park, zip code 19143. Includes one- and two-bedroom units for seniors.	46	$2,800,000	May 2026
Oxford Village	Located near Temple University, zip code 19121. Includes one-, two-, and three-bedroom units.	137	$19,400,000	June 2026
1630 Point Breeze	Located in the Point Breeze neighborhood, zip code 19145. Includes studio, one-, and two-bedroom units.	57	$10,900,000	August 2026
Commons at Point Breeze	Located in the Point Breeze neighborhood, zip code 19146. Includes one-, two-, three-, and four-bedroom units	55	TBD	TBD
Universal Point	Located in the Point Breeze neighborhood, zip code 19146. Includes one-, two-, three-, and four-bedroom units	53	TBD	TBD
Universal Court II	Located in the Graduate Hospital neighborhood, zip code 19146. Includes two- and three-bedroom units.	21	TBD	TBD
TOTAL		**369**	**$33,100,000**	

Please note that PHA will provide additional details to HUD as needed on each acquired property as part of the request to draw down funds. PHA may grant or loan MTW Funds to its affiliate, Philadelphia Housing Authority Development Corporation (PHADC), to acquire properties under this activity. To the extent feasible, MTW Funds will leverage City, State, Low Income Housing Tax Credit equity, tax exempt bond proceeds and other public and private funds.

MTW Funds may also be used for development, renovations and/or rehabilitation of acquired properties. Repairs and improvements will be made to ensure that all units meet HQS or NSPIRE standards.

At the time of acquisition and prior to being covered under a HAP Contract, these properties will not be federal public housing or Project Based Voucher units. Accordingly, this activity will conform to the General Parameters detailed in part 5.A. of HUD PIH Notice 2011-45 ("Notice"), as well as the part 5.D parameters applicable to Local Non-Traditional Housing Development Programs. In accordance with the Notice:

- MTW Funds will support development (acquisition) of rental units targeted for households earning less than 80% of Area Median Income.
- PHA will require deed restrictions or other legally binding covenants to ensure long-term affordability. The minimum affordability term will be thirty years unless otherwise approved by HUD.
- Projects will comply with environmental review requirements pursuant to 24 CFR part 50 or 58 as applicable.
- Housing units will meet HQS or NSPIRE throughout the term.
- Projects will be within the HUD TDC and Housing Cost Cap limits and comply with HUD Cost Control and Safe Harbor Standards for Rental Mixed Finance Development as applicable.

As noted, PHA will report on all funded activities through the MTW Annual Report.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Significant Changes

No significant changes are planned.

B. Activities Not Yet Implemented

Not applicable.

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 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 funds. However, MTW programmatic waivers are not required. These activities are now referenced in

Activity	Plan Year	Close Out Year	Reason for Close Out
			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.
Flexible Subsidy Initiative	FY 2014	FY 2025	PHA determined that this activity was not required and elected not to proceed with implementation.

V. PLANNED APPLICATION OF MTW FUNDS

A. Planned Application of MTW Funds

Tables 9 and 10 below provide estimates of PHA's MTW sources and uses for FY 2027, which begins April 1, 2026 and ends March 31, 2027. As PHA's funding levels for future periods are unknown at the present time, these tables provide preliminary projections and are subject to change based on the actual level of funding provided to PHA. The tables follow HUD's Financial Data Schedule (FDS) format and do not include information on non-MTW funding sources or uses.

i. Estimated Sources of MTW Funds

Table 9: Estimated Sources of MTW Funding for FY 2027

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	$30,508,224
70600	HUD PHA Operating Grants*	$521,722,812
70610	Capital Grants	$56,569,945
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	-
71100+72000	Interest Income	$3,688,000
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	$8,500,000
70000	**Total Revenue**	**$620,988,981**

** 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 $184,101,520, HCV HAP revenue is estimated at $314,410,778, Mainstream estimated at $3,908,864, Foster to Youth Independence estimated at $723,034 and RAD Subsidies estimated at $18,578,616.*

ii. Estimated Application of MTW Funds

Table 10: Estimated Application of MTW Funding for FY 2027

FDS Line Item	FDS Line-Item Name	Dollar Amount
91000(91100+91200+91400+91500+ 91600+91700+91800+91900)	Total Operating – Administrative	$94,173,245
91300+91310+92000	Management Fee Expense	-
91810	Allocated Overhead	--
92500(92100+92200+92300+92400)	Total Tenant Services	$11,197,800
93000 (93100+93600+93200+93300+ 93400+93800)	Total Utilities	$25,650,240

FDS Line Item	FDS Line-Item Name	Dollar Amount
93500+93700	Labor	-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$100,735,290
95000 (95100+95200+95300+95500)	Total Protective Services	$8,854,668
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$20,433,465
96000(96200+96210+96300+96400+ 96500+96600+96800)	Total Other General Expenses	$20,741,876
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	-
97100+97200	Total Extraordinary Maintenance	-
97300+97350	HAP + HAP Portability-In	$255,178,689
97400	Depreciation Expense	-
97500+97600+97700+97800 *	All Other Expense	$84,023,708
90000	**Total Expenses**	**$620,988,981**

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

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses

Not applicable.

iii. Description of Planned Application of MTW Funding Flexibility

Under the MTW Program, PHA is authorized to apply fungibility across the Public Housing Operating Fund, Capital Fund and Housing Choice Voucher Program Housing Assistance Payments and Administrative fee funding sources. Activities that utilize MTW single fund flexibility, and that are not otherwise authorized pursuant to the Proposed and Approved MTW Activities sections of the Annual Plan, are summarized below:

- Capital Activities to support development activities including acquisitions, new development, and preservation of affordable housing, 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 2027 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.

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

- PHA may utilize single fund flexibility to support the planning and development of a child savings program for young children who are part of PHA HCV and PH households. Based on preliminary discussions, PHA anticipates making contributions to educational savings accounts on behalf of eligible PHA children. PHA is currently determining the parameters for the program and working to identify potential partners for administering the savings program. PHA may propose an MTW activity in future fiscal years if components of the child savings program require an MTW waiver.

- In FY 2027, PHA may utilize single fund flexibility to support the stability and success of veterans newly admitted and housed through the VASH program. Specifically, PHA may provide financial assistance for veterans to purchase basic home furniture for their rental unit.

Table 11: Resident Services Program Summary for FY 2027

Program/Partner	Program Description	Target Population	Funding Source	Projected Residents Served
ADULT EDUCATION AND TRAINING				
ABE/GED Program	Adult Basic Education and General Equivalency Diploma education in the required domains.	PHA residents ages 18 to 55	Partnership	20
PHA Workforce Center Job Training Enrollments	Occupational Skills training (CDL, Nurse Aide, IT, Laborers' Union pre-apprenticeship, etc.) in career areas with reasonable growth potential and connection to employment.	PHA residents ages 18 to 55	MTW	150
PHA Workforce Center	Drop-in Center - Employment "One Stop" providing connections jobs and training opportunities.	PHA residents	MTW	100 visits/contacts per month
Section 3 Job Bank	Ensure that economic opportunities are provided to PHA residents through workshops, info sessions and job matches.	PHA residents ages 18 to 55	Section 3 vendors	40 residents
Section 3 Resource Center	Ensure that economic opportunities are provided to PHA residents through workshops, info sessions and partner referrals.	PHA residents ages 18+	MTW/ Section 3 vendors	500 residents participating in workshops and screening

Program/Partner	Program Description	Target Population	Funding Source	Projected Residents Served
Section 3 Career Support	Assist PHA residents with resume support, record mock interview and provide our Career Closet, which offers interview and post-hire attire.	PHA residents ages 18-55	MTW	10 residents employed
Entrepreneurial Fellowship	Our six-month entrepreneurial fellowship is designed to provide extensive training as it relates to growing a small business. Fellows are provided with executive coaching and personalized pathways along with funding.	PHA residents ages 18+	MTW	10-15 Fellows annually
HEALTH, WELLNESS & SAFETY PROGRAMS				
Community Health Worker (CHW) Program	Temple University will train CHWs to provide information on health, safety and wellness at 10+ PHA sites.	All PHA residents	MTW, CNI	10 residents trained; 400 served
Diversionary Initiative	Connect residents with trauma-informed resources to counteract the negative effects of violence in PHA communities and create partnerships and opportunities to reduce criminal activities of at-risk residents	PHA residents and families impacted by traumatic or violent events	MTW	350+ cases resolved
Gun Violence Intervention & Coordination Center Housing Initiative	Housing provision for young men (and their families), who would otherwise be at imminent risk of involvement in community gun violence, who are participating in counseling, job readiness and employment programming	Young men and families at risk of involvement in community gun violence	Civic Coalition to Save Lives	30 households
RPP Social Services Team	Intervention resource providing guidance and direction for social service initiatives surrounding emotional and behavioral health issues, and partners with agencies to negotiate affordable services for residents	PHA and PAPMC residents and families	MTW, LIHTC	150+ household referrals
YOUTH & FAMILY PROGRAMS				
PHA Youth & Family Center	Drop-in center and weekly schedule of partner programming/events for any PHA and/or neighboring families with or expecting children.	PHA families with children and expecting parents	MTW	150 visits/contacts per month
Early Childhood Education Navigation	Referrals and direct assistance to residents enrolling families in childcare, early childhood education and Pre-Kindergarten programs.	PHA families with children ages 0-5	MTW	50 families assisted with new program or provider enrollment per year
Family Enrichment	Linking families to services for the entire household, especially youth needing service referrals or connections.	PHA families with children ages 0-24	MTW	150 families
Afterschool Programs at 10 sites	On site programs which meet the standard of providing (1) homework assistance, (2) project-based learning, (3) community service, and (4) physical/ body kinesthetic activities.	PHA youth ages 6 to 18	MTW	250
PHA Summer Camps at 10 sites	Summer enrichment activities to prevent academic regression.	PHA youth ages 6 to 13	MTW	250 enrolled

Program/Partner	Program Description	Target Population	Funding Source	Projected Residents Served
Mighty Writers Out of School and Summer Programs	Provides literacy programming and activities, plus food and diaper distribution, at three sites.	PHA youth ages 3-18	Partnership HUD/CNI	Approximately 100 PHA residents enrolled. Over 100 additional youth served in PHA communities
Youth Summer Jobs Program – Summer WorkReady	Six weeks of summer employment for youth. Youth are placed at PHA sites.	PHA teens	C2L PHL program and non-profit partners	15 students placed at PHA
Kinship Care Program	Supportive services for grandparents raising grandchildren, foster children and/or other relations ages 0-8 years	Grandparents raising grandchildren age 0-8 in PHA-assisted housing	William Penn Foundation	35 households
Supportive Housing for Foster Youth Aging Out and Formerly Unhoused Youth/Young Adults	Wraparound affordable housing-and-supportive service development serving unhoused and housing-insecure youth and young adults, especially those aging out of foster care who are or are at risk of becoming homeless	Housing-insecure young people ages 18-24, prioritizing youth aging out of foster care	MTW , City of Phila, PHDC	36 households
MEAL PROGRAMS				
Summer Food Program at 10 sites	Breakfast and lunch served on site to provide appropriate nutrition during the summer.	PHA youth ages 5 to 18	MTW/PA Department of Education	30,000 meals served
Senior Meal Programs - Congregate Hall Philadelphia Corp of Aging (3 sites)	Meal program, which not only enables residents to have appropriate nutrition, but also best practice fellowship to support aging in place.	PHA residents ages 62+	HUD	16,000+ meals served @ Congregate Hall 18,000+ meals served @ 3 sites through PCA
FINANCIAL MANAGEMENT				
Financial Literacy – homeownership track	Course on credit and money management to enable residents to purchase homes.	PHA residents	MTW	750
FSS	Assessment of individual and family needs, enrollment in FSS, followed by referrals and tracking.	PHA residents	HUD	700
Homeownership Program	Housing counseling and assistance with home purchase process. This includes 5h, HCV, and Section 32.	PHA residents	MTW, Other	500 attended workshops 50 sales

Program/Partner	Program Description	Target Population	Funding Source	Projected Residents Served
Eviction Prevention for Families with Young Children	Support and financial coaching for public housing families who risk entering the lease enforcement pipeline, and are raising children between the ages of 0-8 years (PHA may elect to expand this initiative to additional families in FY 2027 or future fiscal years.)	Public housing families raising children age 0-8, who are at risk of lease enforcement	William Penn Foundation	100 families
PLACE BASED HUD INITIATIVES				
Jobs Plus Program	Place-based employment program designed to increase the earnings and employment of working-age residents.	PHA residents ages 18 to 64 at Wilson Park	HUD	415 assessed and enrolled
ROSS Program	Assessment of individual and family needs, followed by referrals and tracking.	PHA residents at ROSS target sites	HUD	150+ assessments completed at 8 developments
CNI Sharswood Implementation	Place-based case management for relocated, returning and new families in the redeveloped Blumberg community.	PHA Sharswood households	HUD	Outreach and assessments completed for up to 400 families
CNI Bartram Implementation	Place-based case management for relocated and any returning families who move out of the Bartram Village community as redevelopment begins.	PHA Bartram households	HUD	Outreach and assessments completed for up to 400 families

B. Planned Application of PHA Unspent Operating Fund and HCV Funding

HUD requires that MTW agencies provide the information on Tables 12 and 13. This includes estimated reserve balances as of the beginning of FY 2027 and planned uses of reserves in FY 2027. The amounts, timetables and planned uses shown are preliminary and subject to modification.

Table 12: Planned Unspent Operating Fund and HCV Funding

Original Funding Source	Estimated Reserve Balance as of 04/01/2026	Planned Application of Reserves in FY 2027
HCV HAP*	$248,695,794	$248,695,794
HCV Admin Fee	$29,210,861	$0
PH Operating Subsidy	$61,367,173	$61,367,173
TOTAL:	**$339,273,828**	**$310,062,967**

** Unspent HAP funding does not include amounts recognized as Special Purpose Vouchers reserves.*

Table 13: Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

Planned Use	Estimated Amount	Funding Source	Projected Timeline
Bartram Phase 4a	$20,290,000	MTW Reserves – HCV HAP	1 year
Cassie Holly	$61,367,173	PH Operating Subsidy	1 year
Cassie Holly	$20,232,827	MTW Reserves – HCV HAP	1 year
GGFE 2	$22,327,738	MTW Reserves – HCV HAP	1 year
Gladys Jacobs	$3,528,000	MTW Reserves – HCV HAP	1 year
Johnson Homes II	$53,929,419	MTW Reserves – HCV HAP	1 year
Johnson Homes III	$22,655,591	MTW Reserves – HCV HAP	1 year
LEB I, II, & III; Marshall Sheppard	$12,789,000	MTW Reserves – HCV HAP	1 year
Richard Allen III	$7,849,800	MTW Reserves – HCV HAP	1 year
Richard Allen Conventional	$6,615,000	MTW Reserves – HCV HAP	1 year
Westpark Plaza	$4,811,720	MTW Reserves – HCV HAP	1 year
Wilson Park Low-rise Phase II	$33,600,000	MTW Reserves – HCV HAP	1 year
SS 904	$17,066,700	MTW Reserves – HCV HAP	1 year
General Unit and Site Upgrades	$23,000,000		
Total	**$310,062,967**		

C. Local Asset Management Plan

i.	*Is the MTW PHA allocating costs within statute?*	No
ii.	*Is the MTW PHA implementing a local asset management plan (LAMP)?*	Yes
iii.	*Has the MTW PHA provided a LAMP in the appendix?*	Yes

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. When applicable, PHA will submit updates to the LAMP as part of the Annual Plan submission. No changes are proposed to the LAMP for FY 2027. A copy of the current LAMP is included in Appendix B.

D. Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation

The conversion of public housing units to project-based assistance under the RAD program is an important component of PHA's "Opening Doors" 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 14 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 2027 and future years. PHA will also continue to utilize HUD's "Faircloth to RAD" (FTR) initiative to expand the supply of affordable housing. Under FTR, PHA is able to tap into unused public housing Annual Contributions Contract (ACC) authority, develop new public housing using that authority and then convert the public housing to Project Based Voucher assistance under the RAD program. Projects listed in Table 14 below may be pending Low Income Housing Tax Credit awards and/or other financing and, as a result, are subject to change.

For informational purposes, Table 15 includes those developments that PHA has converted through the RAD program, as well as the developments PHA expects to convert through the RAD program by the close of FY 2026, including transfer of assistance and FTR 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 and FTR extends beyond FY 2027 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. Due to variances in development plans and schedules, projects listed may appear in prior or future Annual Plans, and unit counts may vary. PHA may apply for additional RAD conversions beyond those shown in Tables 14 and 15.

Table 14: RAD Closings Planned in FY 2027 and Future Years

AMP	Development Name	RAD Units	Description
PA2-TBD	11th & Berks (North Central VI)	136	New construction development under Faircloth to RAD
PA2-TBD	28th & York	55	New construction development under Faircloth to RAD
PA2-TBD	5000 Warrington Avenue	50	New construction development under Faircloth to RAD
PA2-030	Abbottsford	236	Conversion of existing public housing development

AMP	Development Name	RAD Units	Description
PA2-031	Bartram Village	448	Conversion of existing public housing development
PA2-TBD	Beacon of Hope	20	Rehabilitation/adaptive reuse under Faircloth to RAD
PA2-TBD	Beech Senior Apartments	100	Adaptive/reuse under Faircloth to RAD
PA2-TBD	Brith Sholom	336	Rehabilitation under Faircloth to RAD
PA2-137	Cambridge I	44	Conversion of existing PAPMC public housing development
PA2-129	Cambridge II	40	Conversion of existing PAPMC public housing development
PA2-147	Cambridge III	40	Conversion of existing PAPMC public housing development
PA2-062	Cassie Holley	71	Conversion of existing public housing development
PA-TBD	Cecil B. Moore Senior	63	New construction under Faircloth to RAD
PA2-189	Dauphin House	52	Conversion of existing AME public housing development
PA2-126	Eight Diamonds	152	Conversion of existing AME public housing development
PA2-TBD	Fairhill III	74	New construction development under Faircloth to RAD
PA2-TBD	Fairmount Flats	24	New construction development under Faircloth to RAD
PA2-130	Falls Ridge	135	Conversion of existing AME public housing development
PA2-TBD	Frankford TOD	132	New construction development under Faircloth to RAD
PA2-TBD	Gaudenzia Cathedral Homes	40	New construction development under Faircloth to RAD
PA2-152	Germantown House	133	Conversion of existing PAPMC public housing development
PA2-139	GGFE I	245	Conversion of existing PAPMC public housing development
PA2-143	GGFE II	184	Conversion of existing PAPMC public housing development
PA2-114	Gladys B. Jacobs	80	Conversion of existing public housing development
PA2-TBD	HACE – Fairhill and Hugh St. Lofts Scattered Sites	43	New construction development under Faircloth to RAD
PA2-015	Harrison Plaza Low Rise	188	Conversion of existing public housing development
PA2-176	Impact Services Veterans Housing	18	Conversion of existing AME public housing development
PA2-001	Johnson Homes	535	Conversion of existing public housing development
PA2-145	LEB I	80	Conversion of existing PAPMC public housing development
PA2-150	LEB II	80	Conversion of existing PAPMC public housing development
PA2-153	LEB III	50	Conversion of existing PAPMC public housing development

AMP	Development Name	RAD Units	Description
PA2-186	Liberty 52	24	Conversion of existing AME public housing development
PA2-157	Ludlow Phase III	75	Conversion of existing PAPMC public housing development
PA2-184	Maguire Residence	27	Conversion of existing AME public housing development
PA2-163	Mantua I	50	Conversion of existing PAPMC public housing development
PA2-165	Mantua II	51	Conversion of existing PAPMC public housing development
PA2-156	Marshall Shepard	80	Conversion of existing PAPMC public housing development
PA2-TBD	Media Flats – 6435 Media Street	33	New construction development under Faircloth to RAD
PA2-128	MLK I	49	Conversion of existing AME public housing development
PA2-136	MLK III	45	Conversion of existing AME public housing development
PA2-149	MLK IV	42	Conversion of existing PAPMC public housing development
PA2-138	Mt. Olivet	161	Conversion of existing PAPMC public housing development
PA2-158	Nellie Reynolds Gardens	64	Conversion of existing PAPMC public housing development
PA2-TBD	New Africa Center	41	New construction development under Faircloth to RAD
PA2-182	New Courtland Apartments at Henry Avenue	49	Conversion of existing AME public housing development
PA2-177	New Courtland at Allegheny	56	Conversion of existing AME public housing development
PA2-183	New Courtland at Henry Avenue Phase 1B	36	Conversion of existing AME public housing development
PA2-188	Nicole Hines Townhomes	23	Conversion of existing AME public housing development
PA2-TBD	Opportunities Apartments	41	New construction development under Faircloth to RAD
PA2-173	Paschall I	50	Conversion of existing PAPMC public housing development
PA2-175	Paschall II	50	Conversion of existing PAPMC public housing development
PA2-190	Peg's Place	40	Conversion of existing AME public housing development
PA2-TBD	Philly House Residence	70	New construction development under Faircloth to RAD
PA2-TBD	Project Home – 4912 Griscom Street	44	New construction development under Faircloth to RAD
PA2-003	Richard Allen Homes	150	Conversion of existing public housing development
PA2-133	Richard Allen III	178	Conversion of existing PAPMC public housing development
PA2-131	Saint Anthony's	38	Conversion of existing AME public housing development

AMP	Development Name	RAD Units	Description
PA2-TBD	Scattered Sites	25	New construction development under Faircloth to RAD
PA2-020	Spring Garden Apartments	202	Conversion of existing public housing development
PA2-181	St. Francis Villa	40	Conversion of existing AME public housing development
PA2-192	St. Rita Place Senior Housing	46	Conversion of existing AME public housing development
PA2-132	Suffolk Manor	137	Conversion of existing PAPMC public housing development
PA2-TBD	The Queen Senior Apartments	49	New construction development under Faircloth to RAD
PA2-TBD	Walton School	48	Adaptive reuse under Faircloth to RAD
PA2-160	Warnock I	50	Conversion of existing PAPMC public housing development
PA2-161	Warnock II	45	Conversion of existing PAPMC public housing development
PA2-TBD	West Philadelphia Preservation	45	New construction development under Faircloth to RAD
PA2-TBD	Westbrook Community Apartments	50	Adaptive Reuse and New Construction under Faircloth to RAD
PA2-013	Wilson Park	728	Conversion of existing public housing development
	Total	**6,916**	

Table 15: RAD Closings Completed or Projected to be Completed by End of FY 2026

Property Name	RAD Units	Description
Blumberg Phase I	51	Transfer of Assistance
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	49	Transfer of Assistance
Southwark Plaza (PA2-121)	470	Conversion of existing AME public housing
Strawberry Mansion	55	Transfer of Assistance
Haddington III	48	Transfer of Assistance
Roberto Clemente House	38	Transfer of Assistance
Norris Apartments II (CNI)	74	CNI RAD Conversion
Cantrell Place	40	Transfer of Assistance
Witherspoon Senior Apartments	40	Transfer of Assistance
1315 N. 8th Street	25	Transfer of Assistance
Blumberg Phase II-Senior Building	94	Conversion of existing public housing
Norris Square Community Alliance Scattered Sites	29	Transfer of Assistance

Property Name	RAD Units	Description
Plymouth Hall (PA2-079)	53	Conversion of existing public housing
Norris Apartments Phase III	28	CNI RAD Conversion
Blumberg 83	83	Transfer of Assistance
Susquehanna Square	37	Transfer of Assistance
Norris Apartments Phase V (CNI)	45	CNI RAD Conversion
Reynolds School	49	Transfer of Assistance
27th and Susquehanna	78	Transfer of Assistance
Sharswood I (Hunt)	30	Transfer of Assistance
Queen Lane LP	55	Conversion of existing PAPMC public housing
Norris LP	51	Conversion of existing PAPMC public housing
Harrison Plaza Tower	112	Conversion of tower building of existing public housing development
Sharswood II (Hunt)	30	Transfer of Assistance
Sharswood 4a	58	Transfer of Assistance
Janney Apartments	29	Transfer of Assistance
NewCourtland at St. Barts II	48	New construction development under Faircloth to RAD
Father Augustus Tolton Place (Eastwick Senior)	45	New construction development under Faircloth to RAD
Old First House	34	Transfer of Assistance
Sharswood Phase VI-A	65	Transfer of Assistance
Allegheny West Plaza	45	Conversion of existing AME public housing development
Be A Gem Crossing (aka North 10)	41	Conversion of existing AME public housing development
Casa Indiana	50	Conversion of existing AME public housing development
Fairhill Apartments Phase 1	131	Conversion of existing public housing development
Fairhill Apartments Phase 2	133	Conversion of existing public housing development
Inglis Methodist Gardens	47	Conversion of existing AME public housing development
Mill Redevelopment @ A and Indiana	36	Conversion of existing AME public housing development
Queen Row	43	Conversion of existing public housing development
Rafael Porrata-Doria Place	30	Conversion of existing AME public housing development
Sharswood III	101	New construction development under Faircloth to RAD
West Mill Place	30	Conversion of existing AME public housing development
17th Street Community Corridor Project Phase 1	40	New construction development under Faircloth to RAD
Abigail Pankey Apartments	21	New construction development under Faircloth to RAD
Angela Court I/St. Ignatius	67	Conversion of existing AME public housing development
Angela Court II	54	Conversion of existing AME public housing development
Apartments at 40th Street Place	40	New construction development under Faircloth to RAD

Property Name	RAD Units	Description
Bartram Village Phase 1	52	Conversion of existing public housing development
Clearfield Apartments	48	New construction development under Faircloth to RAD
Compassion Senior Living	38	New construction development under Faircloth to RAD
Francis House	50	Conversion of existing AME public housing development
Good Shepherd	31	New construction development under Faircloth to RAD
Liberty53: Estelle B. Richman Place	31	New construction development under Faircloth to RAD
Linda Lockman King Apartments	23	New construction development under Faircloth to RAD
Neumann North	67	Conversion of existing AME public housing development
North Park Avenue	45	New construction development under Faircloth to RAD
Ruth Street Civic House	44	New construction development under Faircloth to RAD
Sepviva Lofts	51	New construction development under Faircloth to RAD
St. Katherine Drexel Place	48	Rehabilitation and new construction under Faircloth to RAD
West Park Apartments	327	Conversion of existing public housing development
Total	**3,926**	

ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? No

iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

PHA has submitted and obtained HUD approval for the RAD Significant Amendments listed on Table 16, including RAD Significant Amendments submitted on December 29, 2025 as part of Amendment #1 to the FY 2026 Annual Plan and approved by HUD on February 23, 2026.

iv. 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.

Table 16 provides summary information on all previously submitted RAD Significant Amendments, including the HUD approval date for each. Additional Significant Amendments for other planned RAD developments will be submitted in the future.

Table 16: Previously Submitted RAD Significant Amendments

No	Plan Year	Date Submitted to HUD	HUD Approval Date	Property		Number of RAD Units	Transfer of Assistance (Yes/No)
				Pre-Conversion	Post-Conversion		
1.	FY 2015	7/23/2015	7/27/2015	Phase 1 (Blumberg) (PA002000050)	Phase 1 (Blumberg) (PA002000050)	57[1]	Yes
2.	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
3.	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
4.	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
				Spring Garden Mixed Finance (PA002000127)	Spring Garden Mixed Finance (PA002000127)	86	No
5.	FY 2017	8/02/2016	9/06/2016	Norris Apartments II (PA002000014)	Norris Apartments II (PA002000014)	147	No
				Plymouth Hall (PA002000079)	Plymouth Hall (PA002000079)	53	No
6.	FY 2018	1/15/2017	4/23/2017	Westpark Plaza (PA002000093)	Westpark Plaza (PA002000093)	65	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.*

No	Plan Year	Date Submitted to HUD	HUD Approval Date	Property		Number of RAD Units	Transfer of Assistance (Yes/No)
				Pre-Conversion	Post-Conversion		
				Blumberg Senior (PA002000050)	Blumberg Senior (PA002000050)	94	No
7.	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
8.	FY 2019	01/12/2018	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
9.	FY 2020	01/14/2019	05/10/2019	Scattered Sites PA002000901,902,903, 905, 909)	Susquehanna Net Zero Housing, LP	78	Yes
10.	FY 2020	05/24/2019	07/01/2019	Scattered Sites PA002000901,902, 905, 907,908,909)	Sharswood Phase I	30	Yes
11.	FY 2020	10/23/2019	11/18/2019	Norris Apartments LP PA002000175	Norris Apartments LP	51	No
				Queen Lane Apartments LP PA002000179	Queen Lane Apartments LP	55	No
				Queen Row PA002000178	Queen Row	43	No
12.	FY 2021	01/15/2020	03/24/2020	West Park Apartments PA002000039	West Park TBD	327	Yes
				Fairhill Apartments PA002000055	Fairhill TBD	264	Yes
				Harrison Plaza (Tower only) PA002000015	Harrison Tower	112	No
				School of Nursing	School of Nursing[3]	50	Yes
13.	FY 2022	01/15/2021	04/16/2021	Scattered Sites PA002000903, 904, 907	Hunt Sharswood Phase II	30	Yes
				Scattered Sites PA002000901,902, 903, 905, 907, 908, 909, 910	Hunt Sharswood Phase III	95	Yes
				Scattered Sites PA002000901, 908	Henry Avenue Tower	40	Yes
14.	FY 2022	04/21/2021	06/10/2021	Scattered Sites PA002000908, 909, 910	PHA Sharswood Phase IV-A	58	Yes

[3] *School of Nursing and Harlan Street projects have been withdrawn from consideration as RAD TOA conversion projects.*

No	Plan Year	Date Submitted to HUD	HUD Approval Date	Property		Number of RAD Units	Transfer of Assistance (Yes/No)
				Pre-Conversion	Post-Conversion		
				Casa Indiana PA002000185	Casa Indiana	50	No
15.	FY2022	12/23/2021	02/11/2022	Harrison Low Rise PA002000015	Harrison Low-Rise	188	No
16.	FY 2023	12/30/2021	04/28/2022	Scattered Sites PA002000901,902, 903, 904, 905, 907, 908, 909, 910	PHA Sharswood Phase VI-A	65	Yes
				Faircloth to RAD	Walton School	51	-
				Faircloth to RAD	Hunt Sharswood Phase III	101	-
17.	FY 2023	05/23/2022	06/28/2022	Scattered Sites PA002000903, 904, 905, 906, 907, 908, 909	Old First House	34	Yes
				Scattered Sites PA002000901, 910	Janney Apartments	29	Yes
				Faircloth to RAD	Father Augustus Tolton Place (Eastwick)	45	-
				Faircloth to RAD	Compassion Senior Living	38	-
				Faircloth to RAD	NewCourtland St.Barts Phase 2	48	-
18.	FY 2023	12/21/2022	01/10/2023	Faircloth to RAD	Rafael Porrata-Doria Place	30	-
				Faircloth to RAD	West Mill Place	20	-
				Faircloth to RAD	Allegheny West Plaza	45	-
				Faircloth to RAD	Be a Gem Crossing	41	-
				Faircloth to RAD	Mill Redevelopment A & Indiana	36	-
19.	FY 2024	06/26/2023	09/22/2023	Faircloth to RAD	Abigail Pankey Apartments	21	-
				PA002000146	Angela Court I/ St. Ignatius	67	No
				PA002000159	Angela Court II	54	No
				Faircloth to RAD	Apartments at 40th Street Place	40	-
				PA002000031	Bartram Village Off-Site Replacement Housing Phase I	64	No
				Faircloth to RAD	Beech Senior Apartments	100	-
				PA002000137	Cambridge Plaza I	44	No
				PA002000129	Cambridge Plaza II	40	No
				PA002000147	Cambridge Plaza III	40	No
				Faircloth to RAD	Clearfield Apartments	48	-
				PA002000130	Falls Ridge (Schuylkill	135	No

No	Plan Year	Date Submitted to HUD	HUD Approval Date	Property		Number of RAD Units	Transfer of Assistance (Yes/No)
				Pre-Conversion	Post-Conversion		
					Falls)		
				PA002000114	Gladys B. Jacobs	80	No
				Faircloth to RAD	Good Shepherd	31	-
				Faircloth to RAD	Liberty53: Estelle B. Richman Place	31	-
				PA002000148	Neumann North	67	No
				Faircloth to RAD	Opportunities Apartments	41	-
				PA002000133	Richard Allen III	178	No
				Faircloth to RAD	Ruth Street Civic House	44	-
				Faircloth to RAD	Westbrook Community Apartments	50	-
20.	FY 2024	01/08/2024	02/21/2024	PA002000062	Cassie Holley (Point Breeze Court)	71	No
				Faircloth to RAD	Cecil B Moore Senior	63	-
				PA002000189	Dauphin House	52	No
				PA002000139	Greater Grays Ferry Estates I (Tasker I)	245	No
				PA002000143	Greater Grays Ferry Estates II	184	No
				PA002000191	Inglis Methodist Gardens	47	No
				PA002000149	MLK IV	42	No
				PA002000138	Mount Olivet	161	No
				PA002000177	New Courtland at Allegheny	56	No
				PA002000131	St Anthonys Senior Residence	38	No
				PA002000132	Suffolk Manor	137	No
				PA002000013	Wilson Park	728	No
21.	FY 2025	12/23/2024	03/06/2025	Faircloth to RAD	11th & Berks	136	-
				Faircloth to RAD	17th Street Community Corridor Project Phase 1	40	-
				Faircloth to RAD	5000 Warrington Avenue	50	-
				Faircloth to RAD	Beacon of Hope	20	-
				Faircloth to RAD	Brith Sholom	336	-
				Faircloth to RAD	Fairhill III	74	-
				Faircloth to RAD	Fairmount Flats	24	-
				PA002000187	Francis House	50	No
				Faircloth to RAD	Gaudenzia Cathedral Homes	40	-
				PA002000176	Impact Services Veterans Housing	18	No
				Faircloth to RAD	Linda Lockman King Apartments	23	-

No	Plan Year	Date Submitted to HUD	HUD Approval Date	Property		Number of RAD Units	Transfer of Assistance (Yes/No)
				Pre-Conversion	Post-Conversion		
				Faircloth to RAD	New Africa Center	41	-
				PA002000182	New Courtland Apartments at Henry Avenue	49	No
				PA002000183	New Courtland at Henry Avenue Phase 1B	36	No
				Faircloth to RAD	North Park Avenue	45	-
				Faircloth to RAD	Scattered Sites	25	-
				Faircloth to RAD	Sepviva Lofts	51	-
				Faircloth to RAD	St. Katherine Drexel Place	48	-
				Faircloth to RAD	The Queen Senior Apartments	49	-
22.	FY 2026	12/29/2025	02/23/2026	PA002000186	Liberty 52	24	-
				PA002000184	Maguire Residence	27	-
				PA002000188	Nicole Hines Townhomes	23	-
				PA002000190	Peg's Place	40	-
				PA002000181	St. Francis Villa	40	-
				PA002000192	St. Rita Place Senior Housing	46	-
				PA002000152	Germantown House	133	-
				PA002000145	LEB I	80	-
				PA002000150	LEB II	80	-
				PA002000153	LEB III	50	-
				PA002000157	Ludlow Phase III	75	-
				PA002000163	Mantua I	50	-
				PA002000165	Mantua II	51	-
				PA002000156	Marshall Shepard	80	-
				PA002000158	Nellie Reynolds Gardens	64	-
				PA002000173	Paschall I	50	-
				PA002000175	Paschall II	50	-
				PA002000160	Warnock I	50	-
				PA002000161	Warnock II	45	-
				PA002000030	Abbottsford	236	-
				PA002000031	Bartram Village	436	-
				PA002000001	Johnson Homes	533	-
				PA002000003	Richard Allen Homes	150	-
				PA002000020	Spring Garden Apartments	202	-
				Faircloth to RAD	28th & York	55	-
				Faircloth to RAD	Frankford TOD	132	-
				Faircloth to RAD	HACE – Fairhill and Hugh St. Lofts Scattered Sites	43	-
				Faircloth to RAD	Media Flats – 6435 Media Street	33	-

No	Plan Year	Date Submitted to HUD	HUD Approval Date	Property		Number of RAD Units	Transfer of Assistance (Yes/No)
				Pre-Conversion	Post-Conversion		
				Faircloth to RAD	Philly House Residence	70	-
				Faircloth to RAD	Project Home – 4912 Griscom Street	44	-
				Faircloth to RAD	West Philadelphia Preservation	45	-

VI. ADMINISTRATIVE

A. Board Resolution and Certifications of Compliance

A resolution approving the FY 2027 MTW Annual Plan and the MTW Plan Certification of Compliance was adopted by the PHA Board of Commissioners at the December 2025 meeting following the public review process and public hearing. The Resolution for the FY 2027 MTW Annual Plan is included in Appendix A.

B. Documentation of Public Process

PHA provided public notice of the FY 2027 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 October 31 through November 30, 2025. A virtual, online public hearing was held on November 19, 2025 attended by two (2) participants, in addition to PHA staff. PHA also conducted a meeting on November 12, 2025 with resident leadership to discuss proposed Plan contents and provide additional opportunities for resident input. The meeting was attended by 43 participants, including resident leadership and PHA staff.

PHA provided public notice of Amendment #1 to the FY 2027 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 March 5, 2026 to April 4, 2026. A virtual, online public hearing was held on March 25, 2026.

PHA provided public notice of Amendment #2 to the FY 2027 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 June 1 to June 30, 2026. A virtual, online public hearing was held on June 23, 2026

C. Planned and Ongoing Evaluations

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

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

RESOLUTION NO. 12455

RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY TO SUBMIT TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT ITS MOVING TO WORK ("MTW") ANNUAL PLAN FOR FISCAL YEAR 2027 AND A SIGNIFICANT AMENDMENT TO THE FISCAL YEAR 2026 MTW 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 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 subsequently executed a MTW Demonstration Agreement ("MTW Agreement"), PHA has continuously participated in the MTW Demonstration Program, with its current agreement extending to 2038; 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 ("FY"), with FY 2027 beginning on April 1, 2026; and

WHEREAS, PHA has distributed to the Board both PHA's MTW Annual Plan for FY 2027 ("Plan"), a summary of which is attached hereto as Attachment "A," and a Significant Amendment to the MTW Annual Plan for FY 2026 ("Amendment"), which is for three thousand, thirty-six (3,036) units at the following thirty-one (31) developments: Liberty 52; Maguire Residences; Nicole Hines Townhomes; Peg's Place; St. Francis Villa; St. Rita Place Senior Housing; Germantown House; LEB I; LEB II; LEB III; Ludlow Phase III; Mantua I; Mantua II; Marshall Shepard; Nellie Reynolds Gardens; Paschall I; Paschall II; Warnock I; Warnock II; Abbottsford; Bartram Village; Johnson Homes; Richard Allen Homes; Spring Garden Apartments; 28th & York; Frankford TOD; HACE Fairhill and Hugh Street Lofts Scattered Sites; Media Flats 6435 Media Street; Philly House Residence; Project Home 4912 Griscom Street; and West Philadelphia Preservation; and

WHEREAS, PHA has fulfilled the HUD requirement of providing opportunities for resident and public participation and comment on the FY 2027 Plan and the FY 2026 Amendment, 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 12, 2025; 2) holding a Public Hearing on November 19, 2025; 3) posting the draft Plan and Amendment on PHA's website; 4) making copies of the draft Plan and Amendment available at PHA's Headquarters; and 5) accepting and considering public comments from October 31, 2025 through November 30, 2025;

BE IT RESOLVED that the Board of Commissioners hereby approves the MTW Annual Plan for FY 2027 and a Significant Amendment to the FY 2026 MTW Plan, 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 FY 2027 Annual MTW Plan and the FY 2026 MTW Plan Amendment; 2) take all steps necessary to finalize and secure HUD approval and implement initiatives described in the Plan and Amendment, 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," for each certification.

I hereby certify that this was APPROVED BY THE BOARD ON 12/18/2025

ATTORNEY FOR PHA

OMB Approval No. 2577-0216 (exp. 08/31/2027)

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 Chair 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 (04/01/2026), 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 (42 USC 2000d-1), the Fair Housing Act (42 USC 3601 et seq.), section 504 of the Rehabilitation Act of 1973 (29 USC 794), title II of the Americans with Disabilities Act of 1990 (42 USC 12131 et seq.), the Violence Against Women Act (34 USC 12291 et seq.), all regulations implementing these authorities; and other applicable Federal, State, and local fair housing and civil rights laws.

(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 signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies, for the PHA's jurisdiction and a description of the way the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).

(7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take 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 requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR 5.151). The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.

(9) In accordance with the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity),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 75.

(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 accordance with the Byrd Amendment,31 U.S.C. § 1352.

(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 2 CFR 200.334 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 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), as applicable.

(21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.

(22) 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.

(23) 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 and should be made available electronically, upon request.

Philadelphia Housing Authority	PA002
MTW PHA NAME	***MTW PHA NUMBER/PHA CODE***

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Lynette M. Brown-Sow	PHA Board Chair
NAME OF AUTHORIZED OFFICIAL	***TITLE***
	12/18/25
SIGNATURE	***DATE***

* ***Must be signed by either the Chair 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 Chair or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.***

NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD November 17, 2025

PHA on October 31, 2025

The Philadelphia Housing Authority (PHA) is requesting public comments and conducting a public hearing on: the proposed Moving to Work (MTW) Annual Plan for Fiscal Year 2027 (Annual Plan); a proposed Amendment to the Annual Plan for Fiscal Year 2026, which includes a Rental Assistance Demonstration (RAD) Program Significant Amendment; and, proposed revisions to the Public Housing Admission and Continued Occupancy Policy and the Housing Choice Voucher Administrative Plan. PHA is a participant in the MTW Program pursuant to an Agreement between PHA and the US Department of Housing and Urban Development (HUD). The Annual Plan for Fiscal Year 2027 describes PHA's MTW proposed policy initiatives and activities for the period April 1, 2026 to March 31, 2027.
These documents are available for public review on PHA's website at www.pha.phila.gov under the "News" section. A copy is also available at PHA Headquarters at 2013 Ridge Avenue, Philadelphia, PA 19121 during normal business hours.

PHA residents, Housing Choice Voucher participants and the public may provide comments by attending the virtual public hearing described below and/or by submitting written comments during the comment period.

A public hearing will be conducted at the following time and location:

WEDNESDAY, NOVEMBER 19, 2025 –11:00am

https://pha.webex.com/pha/j.php?MTID=mc603f8470e91465abfad72af834af28e

or WebEx.com Meeting Number: 2335 620 9623; Password: Pdszj2Hxb27

Or Join By Phone: 1-844-621-3956 Access code: 2335 620 9623

The public comment period begins on October 31, 2025 at 12 noon and ends on November 30, 2025 at 12 noon. Comments must be received by the end of the comment period. Please send written comments to:

The Philadelphia Housing Authority
Attention: Sara Schwartz– Public Comments
2013 Ridge Avenue, Philadelphia, PA 19121

or

Sara.Schwartz@pha.phila.gov

The public hearing is being held virtually. If you require assistance, a sign language interpreter or other accommodations, email Desmond.King@pha.phila.gov. Please use the AT&T Relay Service for TTY.

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan
(All PHAs)

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires: 09/30/2027

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, Mark Dodds (*Official's Name*), the Deputy Director for DHCD (*Official's Title*)

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal year 2027 of the Philadelphia Housing Authority (*PHA Name*) is consistent with the

Consolidated Plan or State Consolidated Plan including any applicable fair housing goals or strategies to:

City of Philadelphia (Division of Housing and Community Development)
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR Part 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The development and implementation of affordable housing and economic development initiatives in Philadelphia described in the PHA Plan are consistent with the City's Consolidated Plan and Assessment of Fair Housing.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

Name of Authorized Official:	Title:
Mark Dodds	Deputy Director for DHCD
Signature: Mark Dodds	Date: 12/22/25

This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the 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 this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

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:	2. Status of Federal Action:	3. Report Type:
[a] a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	[a] a. bid/offer/application b. initial award c. post-award	[a] a. initial filing b. material change **For Material Change Only:** year _____ quarter _____ date of last report _____

4. Name and Address of Reporting Entity:	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:
[x] Prime [ ] Subawardee Tier _____, *if known*: **Congressional District**, *if known*: 4c	**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 2027 CFDA Number, *if applicable*: _____
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: 1/9/26

Federal Use Only:

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

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 2027

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.)

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

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
Kelvin A. Jeremiah	President & CEO
Signature	**Date**
X	1/9/26

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

OMB Approval No. 2577-0157 (Exp. 11/30/2023)

Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Philadelphia Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Annual Plan FY 2027

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

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

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

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

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

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

Name of Authorized Official	Title
Kelvin A. Jeremiah	President & CEO
Signature	**Date (mm/dd/yyyy)**
Kelvin A. Jeremiah	1/9/26

Previous edition is obsolete

form HUD 50071 (01/14)

ADDENDA
TO
CERTIFICATION OF PAYMENTS TO INFLUENCE FEDERAL TRANSACTIONS

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

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

Signature:

Date: 1/9/26

Appendix B: 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.

- 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 C: Asset Management Table

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
1.	Abbottsford Homes PA002030	Phases I & II; 688 Family Units	Planning for conversion to PBV through the RAD program.	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.	
2.	Arch Homes PA002018	77 Family	Planning for conversion to PBV through the RAD program.	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.	
3.	Bartram Village PA002031	492 Family Units	Planning for CNI Implementation Grant and 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. Acquisition, new development, and rehabilitation of housing stock along with neighborhood revitalization efforts.	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.
4.	Bentley Hall PA002077	100 Elderly Units	Planning for conversion to	As part of Sharswood Blumberg		99 Elderly Units	Possible conversion of units/parcels for residential unit	

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			PBV through the RAD program.	revitalization, possible façade improvements.			reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
5.	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 affiliate 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.
6.	Cambridge Plaza Phase I PA-002137	44 LIHTC Rental Units	Planning for RAD conversion	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.				
7.	Cambridge Plaza Phase II PA-002129	40 LIHTC Rental Units	Planning for RAD conversion	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.				

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
8.	Cambridge Plaza Phase III Phase I PA002147	40 LIHTC Rental Units	Planning for RAD conversion	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.				
9.	Cassie Holly (Point Breeze Court) PA002062	71 Elderly Units	Planning for conversion to PBV through the RAD program.	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.	
10.	Champlost Homes PA002042	102 Family	Planning for conversion to PBV through the RAD program.	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.	
11.	City-Wide	To be determined		Provision of ACC subsidy, capital funds or HCV to eligible entities, including development partners.	Dispo/Demo application to be submitted to HUD.			
12.	Collegeview Homes PA002065	54 Elderly	As part of Sharswood Blumberg revitalization, possible façade improvements; Planning for conversion to	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with		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.	

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			PBV through the RAD program.	Choice/RAD and/or LIHTC Application.				
13.	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 PRA and/or PHA affiliate 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.
14.	Eastern North Philadelphia	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to PRA and/or PHA affiliate 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.
15.	Eight Diamonds PA00126 PA00141 (Formerly known as Raymond Rosen Off-Site PA002126)	Phases A & B; 152 Family	Planning for RAD conversion	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	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to PRA		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.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				for-profit organization. May use ACCs and/or Capital Funds to develop units. Potential for conversion to project-based assistance under RAD.	and/or PHA affiliate and/or private entities.			
16.	Emlen Arms PA002076	156 Elderly High Rise	Planning for conversion to PBV through the RAD program.			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.	
17.	Fairhill Apartments PA002055	264 Family	Planning for RAD conversion and redevelopment	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with RAD and/or LIHTC Application. Possible acquisition of adjacent land for development purposes.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to PRA and/or PHA affiliate and/or private entities. Possible early relocation in connection with RAD conversion.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
18.	Falls Ridge			Development partner for vacant land.	Possible disposition of vacant land			
19.	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	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to PRA	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.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				for-profit organization. May use ACCs and/or Capital Funds to develop units.	and/or PHA affiliate and/or private entities.			
20.	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 of initial LIHTC compliance period. Planning for conversion to PBV through the RAD program.			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.	
21.	Gladys B. Jacobs PA002114	80 Elderly	Planning for RAD conversion	Possible renovation for delivery of enhanced senior support services.		80 Elderly Units		
22.	Greater Grays Ferry Estates (Formerly known as Tasker Homes) New AMP#s: PA002139 PA002143	429 LIHTC rental units; 125 replacement home ownership units.	Planning for RAD conversion	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-	Possible disposition in connection with non-dwelling commercial development including community building.			

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				based assistance under RAD.				
23.	Haddington Homes PA002035	150 Family	Planning for conversion to PBV through the RAD program.	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.
24.	Harrison Plaza PA002015	300 Family High and Low Rise	Planned RAD Conversion, CNI Planning Grant activities	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with RAD and/or LIHTC Application. Possible candidate for CNI Implementation grant.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
25.	Haverford Homes PA002046	24 Family	Planning for conversion to PBV through the RAD program.	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.
26.	Herbert Arlene Homes PA002104	32 Family	Planning for conversion to PBV through the RAD program.	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds,	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.	

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.				
27.	Hill Creek Apts I & II PA002029	334 Family	Planning for conversion to PBV through the RAD program.	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 conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
28.	Holmecrest Apartments PA002066	84 Elderly	Planning for conversion to PBV through the RAD program.	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.	
29.	James Weldon Johnson House PA002001	535 Family	Master planning for historic renovations and modernization; Planning for conversion to PBV through the RAD program.	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.	
30.	Katie B. Jackson PA002063	59 Elderly 9 Family	Planning for conversion to PBV through the RAD program.	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW,		59 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community	

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				program incomes, private funds with Choice/RAD and/or LIHTC Application.			and supportive services offices and/or open space.	
31.	Lucien E. Blackwell Homes Phase I PA002145	80 LIHTC Rental Units	Planning for conversion to PBV through the RAD program.	Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
32.	Lucien E. Blackwell Homes Phase II PA002150	80 LIHTC Rental Units	Planning for conversion to PBV through the RAD program.	Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
33.	Lucien E. Blackwell Homes Phase III PA002153	50 LIHTC Rental Units	Planning for conversion to PBV through the RAD program.	Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
34.	Lucien E. Blackwell Homes Phase IV (Marshall Shepard Village) PA002156	80 LIHTC Rental Units	Planning for conversion to PBV through the RAD program.	Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
35.	Ludlow HOPE 6 Area Scattered Sites PA #s: PA002154	Phases I, II, III, IV & V; 75 LIHTC and 103 Homeownership units	Planning for conversion to PBV through the RAD program..	Development completed. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
36.	Mantua Hall PA002045	152 Family High- Rise Units	Leasing of commercial space.	Planning for conversion to PBV through the RAD program.				

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
37.	Martin Luther King Plaza PA002036 New PA#s: PA002128 PA002136 PA002149	Phases I, II, III, IV, V & VI; 136 LIHTC Rental Units and 109 Replacement Homeownership Units.	Planning for RAD conversion	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 mixed-finance development and/or other sale transactions to City and private developers.			109 HomeownershipUnits. HOPE VI HO Middle income Program essential elements of Nehemiah, USHA of1937.
38.	Mill Creek Extension East	100 Rental Units	Planning for conversion to PBV through the RAD program.	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.
39.	Mill Creek Extension West	100 Rental Units	Planning for conversion to PBV through the RAD program.	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	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.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				Capital Funds to develop units.				
40.	Morton Homes PA002049	65 Units	Electrical upgrades as part of the Better Building Challenge done; Planning for conversion to PBV through the RAD program.	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.
41.	Mt. Olivet PA002138	161 LIHTC Rental Units	Planning for RAD conversion	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		
42.	Nellie Reynolds Garden PA002158	64 Elderly housing units.	Planning for conversion to PBV through the RAD program.	Development completed. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.		64 Elderly housing designation.		
43.	Neumann North PA002148	67 LIHTC Rental Units	Planning for RAD conversion	Potential for conversion to project-based assistance under RAD.		67 Elderly Units Designated		
44.	Norris Apartments PA002014	147 Rental Units	RAD Choice Neighborhood	Modernization, rehabilitation,	Demolition complete. Disposition of land in		Possible conversion of units/parcels for residential unit	Homeownership component in connection

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			Redevelopment completed	revitalization, which will include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds. PHA will use Choice Neighborhood, RAD and/or LIHTC Application when available. Planning for conversion to PBV through the RAD program.	connection with development of homeownership phase.		reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	with potential modernization and revitalization.
45.	Oak Lane	100 Rental Units		Possible scattered sites acquisition. Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to PRA and/or PHA affiliate and/or private entities.	May be requesting Elderly or Disabled Only designation.	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease to purchase conventional sale and Housing Choice vouchers.
46.	Oxford Village PA002032	200 Family Units	Planning 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	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.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				and/or LIHTC Application.				
47.	Parkview Apartments PA002054	20 Elderly Low Rises	Planning for conversion to PBV through the RAD program.	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.				
48.	Paschall Homes PA002061	223 Family	Planning for conversion to PBV through the RAD program.	Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.		Possible Elderly Designation		Possible homeownership component
49.	Plymouth Hall PA002079	53 senior high-rises	RAD conversion completed					
50.	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	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 affiliate 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.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				sources for new development.				
51.	Raymond Rosen On-Site PA002010	356 Family	Planning for conversion to PBV through the RAD program.	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.				
52.	Richard Allen Homes Phase III PA002133	178 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.				Includes 15-year tax credit and lease to purchase homeownership components.
53.	Richard Allen Homes Phase II PA002003	150 Units	Planning for conversion to PBV through the RAD program.	Possible new development for residential and non-residential on vacant undeveloped parcels. 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 disposition in connection with the new development.			Possible homeownership component in connection with potential modernization and revitalization.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
54.	Scattered Site Disposition: City-Wide	To be determined	Section 18, RAD and/or Section 18 RAD blends with conversion to PBV	Disposition Plan to be developed and implemented. Possible disposition of properties at market rate, for affordable housing, or transfer to Land Bank. Potential for conversion to project-based assistance under RAD.	Possible demolition in connection with the modernization and revitalization. Disposition application may be required.			Possible Homeownership Component: Revised (h)/Section 32 of USHA of 1937. Possible PHA affordable homeownership program.
55.	Scattered Sites PA002000906	425 Family Units	Section 18, RAD and/or Section 18 RAD blends with conversion to PBV	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.
56.	Scattered Sites PA002000907	406 Family Units	Section 18, RAD and/or Section 18 RAD blends with conversion	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition	Possible demolition/disposition of non-viable units and imminently dangerous properties for		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community	Section 32 of USH of 1937.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			to PBV	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.	neighborhood redevelopment activity.		and supportive services offices and/or open space.	
57.	Scattered Sites PA002000908	373 Family Units	Section 18, RAD and/or Section 18 RAD blends with conversion to PBV	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,	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.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				RACP and any other state and city funding sources when available.				
58.	Scattered Sites PA002000901	399 Family	RAD/PBV conversion underway in FY 2026	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. Possible homeownership component in connection with potential modernization and revitalization.
59.	Scattered Sites PA002000902	378 Family Units	RAD/PBV conversion underway in FY 2026	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	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.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				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.				
60.	Scattered Sites PA002000903	471 Family Units	RAD/PBV conversion underway in FY 2026	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.
61.	Scattered Sites PA002000904	325 Family Units	Section 18, RAD and/or Section 18	Possible development, rehabilitation of existing buildings,	Possible demolition/disposition of non-viable units and		Possible conversion of units/parcels for residential unit reconfiguration and commercial,	Section 32 of USHA of 1937.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			RAD blends with conversion to PBV	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.	imminently dangerous properties for neighborhood redevelopment activity.		economic development, management offices, community and supportive services offices and/or open space.	
62.	Scattered Sites PA002000905	431 Family Units	Section 18, RAD and/or Section 18 RAD blends with conversion to PBV	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	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.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.				
63.	Scattered Sites PA002000909	413 Family Units	Section 18, RAD and/or Section 18 RAD blends with conversion to PBV	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.
64.	Scattered Sites PA002000910	311 Family Units	Section 18, RAD and/or Section 18 RAD blends with conversion to PBV	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 demolition/ disposition of properties in the Sharswood		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, warehouse space, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 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.	condemnation area in connection with the modernization and revitalization efforts of this Choice Neighborhood.			
65.	South Phila area planning	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to PRA and/or PHA affiliate 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.
66.	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	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to PRA and/or PHA affiliate 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.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				Capital Funds to develop units.				
67.	Spring Garden Apartments PA002020	203 Family	Planning for conversion to PBV through the RAD program.	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.
68.	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 PRA and/or PHA affiliate 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.
69.	Spring Garden Revitalization: Phase 1 PA002127	84 LIHTC Rental Units		Potential for conversion to project-based assistance under RAD.				
70.	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.			

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
71.	St Anthony's Senior Residence: PA002131	38 Elderly LIHTC Units	Planning for RAD conversion	Potential for conversion to project-based assistance under RAD.		38 Elderly Units		
72.	St Ignatius Phase I (Angela Court II) PA002146 PA002159	Phases I; 67 Elderly Units Phase II 64	Planning for RAD conversion			67 and 54 Elderly Units Designated		
73.	Suffolk Manor PA002132	137 LIHTC Rental Units	PHA acquired ownership of interest of the limited partner; Planning for RAD conversion	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.		77 Elderly Units		
74.	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 PRA and/or PHA affiliate 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.	
75.	Warnock PA002160	Phase I 50; TBD	Planning for conversion to	Development completed. Potential for				

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			PBV through the RAD program.	refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
76.	Warnock PA002161	Phase II Transitional housing; 45 units	Planning for conversion to PBV through the RAD program.	Acquisition, new development for 45 housing units and rehabilitation of housing stock along with neighborhood revitalization efforts with PHA offices and Elderly Services space.		45 Elderly housing designation.		
77.	Westpark Plaza PA002093	66 Units		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.	
78.	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 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 PRA and/or PHA affiliate 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.
79.	West Park Apartments PA002039	325 Family High- Rise Units	Intent for RAD Conversion and implementation of	Possible candidate for modernization, rehabilitation, revitalization, which	Possible demolition in connection with the modernization and revitalization, and		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development,	Possible homeownership component in connection with potential

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			redevelopment plan	may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.	possible disposition in connection with mixed-finance development or to private developers.		management offices, community and supportive services offices and/or open space. Possible early relocation in connection with RAD conversion.	modernization and revitalization.
80.	Whitehall Apartments I PA002034	188 Family	Planning for conversion to PBV through the RAD program.	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice/RAD and/or LIHTC Application.				
81.	Wilson Park PA002013	741 Family, Low- rise; Elderly, High-rise	Planning 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.		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.	
82.	Walton School		Planning for RAD conversion	Redevelopment into Senior Housing. Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice/RAD, ACC and/or LIHTC Application.				
83.	Reynolds School			Redevelopment of Vacant School in Sharswood				

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				Neighborhood. Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with RAD, and/or LIHTC Application.				
84.	West Philadelphia South of Market Street	50		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 PRA and/or PHA affiliate 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.
85.	North Philadelphia	100		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 PRA and/or PHA affiliate 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.
86.	South Philadelphia	50		Acquisition, new development and rehabilitation of	Possible demolition in connection with modernization and	May be requesting Elderly or	Possible conversion of units/parcels for residential unit reconfiguration and commercial,	Possible homeownership component, subject to Section 32 of the USHA of

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				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.	revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to PRA and/or PHA affiliate and/or private entities.	Disabled Only Designation Plan	economic development, management offices, community and supportive services offices and/or open space.	1937 will include lease to purchase, conventional sale and Housing Choice vouchers.
87.	Northwest Philadelphia	50		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 PRA and/or PHA affiliate 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.
88.	Southwest Philadelphia	50		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 PRA and/or PHA affiliate 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.

No.	Name, Number and Location	Number and Type of Units	Note for FY 2027 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
89.	City-wide PHA administrative buildings	To be determined		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 PRA and/or PHA affiliate 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.
90.	City-wide acquisitions	To be determined		PHA may acquire existing multi-family properties. These properties may be rehabilitated with MTW funds and are possible candidates for Faircloth to RAD, non-competitive selection for PBV, and/or LIHTC Application. PHA may leverage MTW Funds for short and/or long term financing, including bond issuances. Planning for conversion to PBV through the RAD program.	Possible disposition to new entity upon development	Possible designation for some or all units within	Possible conversion through Faircloth to RAD.	

Appendix D: Planned Demo/Dispo Additional Documentation

Listed below are scattered sites units that are planned for demolition and/or disposition in FY 2027 or subsequent periods. PHA may modify this listing in the future. Due to variances with disposition, demolition and/or development schedules, the listed units may also appear in prior or future Annual Plans and may include units that have already been approved for demolition or disposition by HUD. 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
42343	904	473 E PENN ST	19144		2
125450	904	2718 N 15TH STREET	19132		5
125504	904	2912 N 07TH STREET	19133		5
125541	904	2857 N MARVINE ST	19133		3
125554	904	2745 N HICKS ST	19132		3
125566	904	3017 N WARNOCK ST	19133		3
125664	904	2712 W STERNER ST	19132		2
125713	904	2009 W STELLA ST	19132		2
125731	904	1946 W HILTON ST	19140		2
125735	904	2731 N REESE ST	19133		4
125790	904	2804 N HUTCHINSON ST	19133		2
125805	904	2854 N OPAL ST	19132		2
125830	904	2010 LAVEER ST	19138		3
125839	904	1616 W LEHIGH AVE	19132		6
125843	904	254 W ONTARIO ST	19140		3
125865	904	529 W CORNWALL ST	19140		3
125887	904	1507 W LEHIGH AVE	19132		6
125891	904	3040 N CARLISLE ST	19132		2
125918	904	258 W THAYER ST	19140		2
125920	904	264 W THAYER ST	19140		2
125923	904	260 W THAYER ST	19140		2
125924	904	256 W THAYER ST	19140		2
255956	904	3015 N MARVINE ST	19133		3
255977	904	1050 W STELLA ST	19133		2
255982	904	3114 N CHADWICK ST	19132		2
255985	904	2811 N BOUDINOT ST	19134		4
255991	904	4805 MULBERRY ST	19124		3
690560	904	5317 PULASKI AVE	19144		1
690569	904	5327 PULASKI AVE	19144		3
690589	904	5325 PULASKI AVE	19144		3
690590	904	5316 PRISCILLA ST	19144		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690591	904	5320 PRISCILLA ST	19144		3
690797	904	219 E BRINGHURST ST	19144	A	1
690836	904	5237 PULASKI AVE	19144		3
690897	904	5334 PRISCILLA ST	19144		3
690911	904	5322 PRISCILLA ST	19144		2
691061	904	5323 PULASKI AVE	19144		3
691181	904	5319 PULASKI AVE	19144		3
691182	904	49 E COLLOM ST	19144		3
691183	904	51 E COLLOM ST	19144		3
691306	904	31 E COLLOM ST	19144		3
691503	904	219 E BRINGHURST ST	19144	B	2
787001	904	4901 N 20TH STREET	19144	A	3
787002	904	4901 N 20TH STREET	19144	B	3
787003	904	4903 N 20TH STREET	19144	A	3
787004	904	4903 N 20TH STREET	19144	B	3
787005	904	4905 N 20TH STREET	19144		3
787006	904	4907 N 20TH STREET	19144		3
787007	904	4909 N 20TH STREET	19144		3
787008	904	4900 N UBER ST	19141		3
787009	904	4902 N UBER ST	19141		3
787010	904	4904 N UBER ST	19141		3
787011	904	4906 N UBER ST	19141		3
787012	904	4908 N UBER ST	19141		3
787013	904	4910 N UBER ST	19141		3
787014	904	4912 N UBER ST	19141		3
818029	904	1324 W SELTZER ST	19132		3
818030	904	1326 W SELTZER ST	19132		3
818098	904	3154 N CARLISLE ST	19132		2
818128	904	3351 N 05TH STREET	19140		5
818133	904	2725 N HICKS ST	19132		3
818155	904	2731 N GRATZ ST	19132		3
818165	904	2801 N RINGGOLD ST	19132		3
818184	904	3066 N 08TH STREET	19133		6
818193	904	2827 N 02ND STREET	19133		3
818222	904	3136 N 08TH STREET	19133		3
818245	904	2932 N 06TH STREET	19133		5
818248	904	48 E COLLOM ST	19144		4
818272	904	1602 W LEHIGH AVE	19132		5
818295	904	2724 N WARNOCK ST	19133		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
818307	904	62 E PASTORIUS ST	19144		4
818315	904	2939 N TAYLOR ST	19132		3
818333	904	3135 N WENDLE ST	19133		3
818346	904	4525 N BOUVIER ST	19140		3
818347	904	4532 N BOUVIER ST	19140		3
818380	904	2736 N HOWARD ST	19133		3
818426	904	2925 N 06TH STREET	19133		6
818444	904	1340 W CLEARFIELD ST	19132		4
818456	904	2743 N BONSALL ST	19132		3
818466	904	3100 N 08TH STREET	19133		4
818488	904	3323 N SMEDLEY ST	19140		2
818541	904	2713 W LEHIGH AVE	19132		5
818549	904	1408 W PACIFIC ST	19140		3
818553	904	3321 N SMEDLEY ST	19140		3
857104	904	159 E WISHART ST	19134		3
857106	904	2957 MEMPHIS ST	19134		3
857111	904	5652 MORTON ST	19144		3
857117	904	2811 EMERALD ST	19134		3
857130	904	3346 N 22ND STREET	19140		5
857140	904	5627 N WARNOCK ST	19141		3
857142	904	5232 N WARNOCK ST	19141		3
857163	904	4828 N 15TH STREET	19141		3
857165	904	4826 N 15TH STREET	19141		3
857168	904	1138 E WOODLAWN ST	19138		3
857193	904	4241 N 16TH STREET	19140		3
857202	904	5655 N 10TH STREET	19141		3
857207	904	1216 W RUSSELL ST	19140		3
857209	904	4923 N SMEDLEY ST	19141		3
857212	904	5640 N 10TH STREET	19141		4
857217	904	137 W WYNEVA ST	19144		3
857220	904	4052 N 12TH STREET	19140		2
857224	904	4951 N SMEDLEY ST	19141		3
857225	904	3718 N 07TH STREET	19140		3
857226	904	3730 N 07TH STREET	19140		3
857230	904	4943 N HUTCHINSON ST	19141		3
857233	904	4837 N FRANKLIN ST	19120		3
857234	904	5042 N SMEDLEY ST	19141		3
857235	904	1337 E RITTENHOUSE ST	19138		4
857238	904	1315 E RITTENHOUSE ST	19138		4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
857245	904	2913 N 02ND STREET	19133		3
857252	904	2730 N JUDSON ST	19132		3
857258	904	3120 N STILLMAN ST	19132		2
857260	904	2758 N 02ND STREET	19133		3
857261	904	3730 N 05TH STREET	19140		1
857268	904	5570 MATTHEWS ST	19138		3
857270	904	1011 E PRICE ST	19138		3
857279	904	5609 MCMAHON ST	19144		3
857280	904	709 W ROCKLAND ST	19120		3
857282	904	1534 WINGHOCKING ST	19140		3
857300	904	5223 N 10TH STREET	19141		3
857301	904	1201 W AIRDRIE ST	19140	A	2
857562	904	1201 W AIRDRIE ST	19140	B	2
857306	904	3945 N 08TH STREET	19140		3
857338	904	4834 N 08TH STREET	19120		3
857341	904	3912 N PARK AVE	19140		4
857344	904	5123 N HUTCHINSON ST	19141		3
857350	904	4065 N REESE ST	19140		3
857359	904	4842 N WARNOCK ST	19141		4
857362	904	70 E SEYMOUR ST	19144		3
857372	904	4016 N REESE ST	19140		3
857376	904	1629 W VICTORIA ST	19140		3
857378	904	4609 N MARVINE ST	19140		3
857380	904	6637 ROSS ST	19119		3
857382	904	71 E SEYMOUR ST	19144		3
857385	904	4020 N REESE ST	19140		3
857393	904	222 W WISHART ST	19133		3
857394	904	4539 N MARVINE ST	19140		3
857395	904	4232 N REESE ST	19140		3
857399	904	227 W WISHART ST	19133		3
857401	904	5645 N WARNOCK ST	19141		4
857410	904	189 W WISHART ST	19133		3
857411	904	194 W WISHART ST	19133		3
857420	904	1302 W WYOMING AVE	19140		4
857424	904	1853 E CORNWALL ST	19134		2
857456	904	6486 MUSGRAVE ST	19119		3
857470	904	4834 N MARSHALL ST	19120		3
857472	904	4835 N 07TH STREET	19120		3
857479	904	155 W LIPPINCOTT ST	19133		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
857496	904	225 E LIPPINCOTT ST	19134		3
857510	904	830 E WESTMORELAND ST	19134		3
857513	904	624 E PRICE ST	19144		3
857514	904	1667 W WYOMING AVE	19140		3
857521	904	5854 STOCKTON RD	19138		3
857524	904	1808 W ALBANUS ST	19141		3
857528	904	954 E PRICE ST	19138		3
857529	904	943 E PRICE ST	19138		3
857533	904	5839 STOCKTON RD	19138		3
857535	904	5810 STOCKTON RD	19138		3
857539	904	2016 E MONMOUTH ST	19134		3
857543	904	150 W LIPPINCOTT ST	19133		3
857544	904	5608 CROWSON ST	19144		3
857546	904	245 W ABBOTTSFORD AVE	19144		4
857550	904	2312 E CAMBRIA ST	19134		3
888554	904	344 W PENN ST	19144		4
888557	904	3208 N 05TH STREET	19140		5
888581	904	945 CHURCH LANE	19138		4
888586	904	4552 N BOUVIER ST	19140		3
888589	904	2944 N FAIRHILL ST	19133		3
888628	904	3057 N 16TH STREET	19132		6
888634	904	3041 N 10TH STREET	19133		3
888645	904	1924 W WILLARD ST	19140		3
888663	904	324 W INDIANA AVE	19133		3
888668	904	2968 N 04TH STREET	19133		6
888673	904	3328 N SYDENHAM ST	19140		3
888683	904	49 E PHIL-ELLENA ST	19119		4
888684	904	238 ZERALDA ST	19144		3
888688	904	2865 N MARVINE ST	19133		3
888689	904	2863 N MARVINE ST	19133		3
888694	904	3138 N 08TH STREET	19133		3
888695	904	1044 E CHELTEN AVE	19138		4
888711	904	3114 N 08TH STREET	19133		3
888735	904	3637 N 13TH STREET	19140		3
888741	904	146 W HANSBERRY ST	19144		4
888745	904	3737 N 16TH STREET	19140		6
888747	904	224 ZERALDA ST	19144		3
888753	904	2162 CHURCH LANE	19138		3
888760	904	5509 JANE ST	19138		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
888761	904	5538 JANE ST	19138		3
888774	904	3547 N MARVINE ST	19140		3
888796	904	4429 N GRATZ ST	19140		3
888805	904	4504 N GRATZ ST	19140		3
888814	904	1932 W AIRDRIE ST	19140		3
888820	904	3640 OLD YORK RD	19140		4
888828	904	85 E COLLOM ST	19144		3
888829	904	5627 MUSGRAVE ST	19144		4
888839	904	5122 MARION ST	19144		3
888846	904	933 E STAFFORD ST	19138		3
888849	904	908 E STAFFORD ST	19138		3
888851	904	2053 W INDIANA AVE	19132		3
888852	904	2026 W WESTMORELAND ST	19140		3
888854	904	216 W ABBOTTSFORD AVE	19144		4
888860	904	349 MILNE ST	19144		3
888863	904	1316 COLWYN ST	19140		3
888865	904	1316 E PRICE ST	19138		2
888866	904	150 W WISHART ST	19133		3
888869	904	4564 N GRATZ ST	19140		3
888876	904	1245 E STAFFORD ST	19138		3
888883	904	3532 N WARNOCK ST	19140		3
888889	904	62 W WASHINGTON LA	19144		4
888890	904	220 ZERALDA ST	19144		3
888899	904	319 W BERKLEY ST	19144		3
888919	904	274 E PENN ST	19144		3
888921	904	512 E PENN ST	19144		3
888930	904	4212 N HICKS ST	19140		3
888939	904	525 E PENN ST	19144		3
888941	904	296 E QUEEN LANE	19144		3
888942	904	3337 D STREET	19134		3
888943	904	619 E LOCUST AVE	19144		4
888944	904	5307 MAGNOLIA ST	19144		3
916006	904	2050 W INDIANA AVE	19132		3
916011	904	3140 N MARSTON ST	19132		2
916014	904	2730 N GARNET ST	19132		3
916017	904	3403 N 07TH STREET	19140		3
916021	904	3544 N 11TH STREET	19140		4
916022	904	3405 N 07TH STREET	19140		3
916026	904	3027 N WOODSTOCK ST	19132		2

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
916027	904	3046 N 21ST STREET	19132		3
916030	904	4804 N 13TH STREET	19141		4
916032	904	2027 W INDIANA AVE	19132		3
916044	904	3136 N 32ND STREET	19132		3
916048	904	3645 N 07TH STREET	19140		3
916049	904	3611 PERCY ST	19140		3
916053	904	1209 E STAFFORD ST	19138		3
916060	904	1202 W LUZERNE ST	19140		3
916074	904	3654 N 08TH STREET	19140		3
916076	904	3105 N 10TH STREET	19133		3
916077	904	7430 FAYETTE ST	19138		3
916078	904	3009 N 21ST STREET	19132		3
916083	904	1907 PENFIELD ST	19138		3
916090	904	3031 HEMBERGER ST	19132		2
916092	904	4720 DARRAH ST	19124		3
916098	904	914 STERNER ST	19133		3
916101	904	5607 MCMAHON ST	19144		3
916103	904	854 E PRICE ST	19138		3
916107	904	6713 LIMEKILN PK	19138		3
916109	904	6502 N 17TH STREET	19126		3
916110	904	1317 VICTORIA ST	19140		3
916113	904	1639 W VICTORIA ST	19140		3
916115	904	2850 N 23RD STREET	19132		3
916116	904	3238 N BAILEY ST	19129		3
916117	904	3527 N MARVINE ST	19140		3
916118	904	3557 N MARVINE ST	19140		3
916123	904	1330 MEDARY AVE	19141		4
916126	904	1728 W 67TH AVENUE	19126		4
916127	904	2947 N TAYLOR ST	19132		3
916129	904	7938 CEDARBROOK AVE	19150		3
916130	904	1616 W CHAMPLOST ST	19141		3
916131	904	6715 N 18TH STREET	19126		3
916133	904	7256 CORNELIUS ST	19138		3
916137	904	2812 W WISHART ST	19132		3
926700	904	4335 N 05TH STREET	19140		4
926702	904	1833 W ALBANUS ST	19141		3
926703	904	4517 N GRATZ ST	19140		3
926704	904	6318 NORWOOD ST	19138		3
926705	904	1318 E RITTENHOUSE ST	19138		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
926710	904	5309 WINGOHOCKING TERRACE	19144		3
926724	904	1834 SULIS ST	19141		3
926728	904	2831 SWANSON ST	19134		2
926729	904	2833 SWANSON ST	19134		2
926730	904	2841 N SWANSON ST	19134		2
926731	904	3240 PHILIP ST	19140		3
926732	904	203 E WESTMORELAND ST	19134		3
926733	904	4244 N FAIRHILL ST	19140		3
926745	904	2711 N DOVER ST	19132		3
926778	904	2927 N TAYLOR ST	19132		3
926781	904	2054 E WILLIAM ST	19134		2
926788	904	2928 N 03RD STREET	19133		3
926792	904	2957 N 04TH STREET	19133		3
926795	904	2740 N 08TH STREET	19133		3
926797	904	3640 N 18TH STREET	19140		6
926800	904	66 W GOOD STREET	19119		3
976138	904	3019 N TANEY ST	19132		3
976141	904	2003 MEDARY AVE	19138		3
976145	904	6332 N WOODSTOCK ST	19138		3
976148	904	5624 SPRAGUE ST	19138		2
976149	904	1816 CHURCH LANE	19141		3
976152	904	3304 N HOWARD ST	19140		3
976154	904	7231 E WALNUT LANE	19138		3
976159	904	712 W GLENWOOD AVE	19140		3
976168	904	3250 N RANDOLPH ST	19140		2
976169	904	2194 HOMER ST	19138		3
976171	904	1150 E STAFFORD ST	19138		3
976180	904	2102 W MEDARY ST	19138		3
976182	904	6730 N SMEDLEY ST	19126		3
976187	904	7335 OGONTZ AVE	19138		3
976190	904	2005 RIDLEY ST	19138		3
976202	904	2437 W 77TH AVENUE	19150		3
976206	904	6818 N 16TH STREET	19126		3
976207	904	6736 LIMEKILN PIKE	19138		3
976208	904	6231 N BEECHWOOD ST	19138		2
976214	904	3038 N SWANSON ST	19134		2
976216	904	1917 INDEPENDENCE ST	19138		3
976218	904	3333 SMEDLEY ST	19140		3
976222	904	6633 N 18TH STREET	19126		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
976224	904	1307 W WISHART ST	19132		3
976225	904	3017 N LAWRENCE ST	19133		3
976226	904	2439 W 77TH AVENUE	19150		3
976229	904	169 W LIPPINCOTT	19133		3
976231	904	3544 N MARVINE ST	19140		3
976233	904	6555 LAMBERT ST	19138		3
976236	904	917 E PRICE ST	19138		3
976238	904	5315 MAGNOLIA ST	19144		3
976240	904	2147 CONLYN ST	19138		3
976245	904	633 E LOCUST AVE	19144		4
976246	904	621 E WOODLAWN ST	19144		3
976247	904	3236 A STREET	19134		3
976249	904	2942 N ROSEHILL ST	19134		2
976255	904	3135 N HARTVILLE ST	19134		3
41502	905	512 W YORK ST	19133		4
41514	905	1505 N 06TH STREET	19122		5
41525	905	2112 N 04TH STREET	19122		4
41533	905	1931 N 05TH STREET	19122		6
41549	905	644 W HUNTINGDON ST	19133		5
41563	905	508 W YORK ST	19133		4
41570	905	1933 N 05TH STREET	19122		4
41571	905	1935 N 05TH STREET	19122		4
41572	905	1937 N 05TH STREET	19122		4
41595	905	2515 N 06TH STREET	19133	A	2
41596	905	2515 N 06TH STREET	19133	B	4
41613	905	1900 N HOWARD ST	19122	B	4
41614	905	2318 N 07TH STREET	19133		6
41616	905	2559 N FRANKLIN ST	19133		5
41618	905	2251 N HOWARD ST	19133		4
41619	905	410 W NORRIS ST	19122		6
41644	905	525 W YORK ST	19133		4
41654	905	2448 N MARSHALL ST	19133	A	1
41655	905	2448 N MARSHALL ST	19133	B	4
41658	905	2315 N 07TH STREET	19133	A	2
41659	905	2315 N 07TH STREET	19133	B	6
41665	905	2152 N 05TH STREET	19122		5
41680	905	2304 N 05TH STREET	19133		4
41686	905	2435 N 06TH STREET	19133		4
41699	905	2430 N 06TH STREET	19133	A	1

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
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
41725	905	2445 N LAWRENCE ST	19133		4
41751	905	2525 N 05TH STREET	19133	A	2
41752	905	2525 N 05TH STREET	19133	B	4
41761	905	2029 N LAWRENCE ST	19122		4
41763	905	2153 N 05TH STREET	19122		4
41772	905	2532 N HOWARD ST	19133		5
41774	905	2223 N FAIRHILL ST	19133		3
41778	905	2413 N LAWRENCE ST	19133		4
41784	905	2508 N MARSHALL ST	19133		3
41803	905	2537 N MARSHALL ST	19133		2
41808	905	2623 N 06TH STREET	19133	A	2
41809	905	2623 N 06TH STREET	19133	B	4
41810	905	416 W DAUPHIN ST	19133		5
41821	905	622 W CUMBERLAND ST	19133		5
41834	905	2164 N 05TH STREET	19122		5
41877	905	2215 N LAWRENCE ST	19133		3
41882	905	2648 N HOWARD ST	19133		2
41883	905	2650 N HOWARD ST	19133		2
41884	905	2660 N HOWARD ST	19133		2
41925	905	2309 N 07TH STREET	19133		5
41932	905	2108 N 05TH STREET	19122		5
41935	905	2356 N 03RD STREET	19133		5
41938	905	1953 N 04TH STREET	19122		5
41939	905	2357 N FAIRHILL ST	19133		3
41940	905	532 W YORK ST	19133		5
41941	905	2415 N MARSHALL ST	19133		5
41945	905	2350 N BODINE ST	19133		3
41946	905	2027 N LAWRENCE ST	19122		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
41961	905	2316 N FAIRHILL ST	19133		3
41965	905	2556 N 07TH STREET	19133	A	1
41966	905	2556 N 07TH STREET	19133	B	4
41984	905	2403 N LAWRENCE ST	19133		4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
41988	905	2114 N 05TH STREET	19122		4
42022	905	2328 N LAWRENCE ST	19133		3
42035	905	2310 N LAWRENCE ST	19133		3
42036	905	544 W HUNTINGDON ST	19133		5
42045	905	2467 N FAIRHILL ST	19133		3
42088	905	2252 N 02ND STREET	19133		5
42090	905	2325 N LAWRENCE ST	19133		2
42100	905	2208 N LEITHGOW ST	19133		2
42101	905	2222 N LEITHGOW ST	19133		2
42102	905	2224 N LEITHGOW ST	19133		2
42103	905	2134 N 05TH STREET	19122		5
42158	905	2224 N LAWRENCE ST	19133		5
42175	905	1920 N 03RD STREET	19122		4
42176	905	2314 N 07TH STREET	19133		5
42194	905	2335 N LAWRENCE ST	19133		3
42195	905	2540 N 07TH STREET	19133		3
42207	905	535 W BERKS ST	19122		5
42239	905	2240 N 04TH STREET	19133		5
42292	905	2026 N BODINE ST	19122		2
42298	905	1722 N ORIANNA ST	19122		6
42335	905	2517 N 08TH STREET	19133		3
42344	905	438 DIAMOND ST	19122		4
42345	905	2248 N REESE ST	19133		2
42356	905	2242 N 04TH STREET	19133		5
42379	905	709 W CUMBERLAND ST	19133	A	1
42380	905	709 W CUMBERLAND ST	19133	B	4
42381	905	532 DIAMOND ST	19122		4
42422	905	2009 N 03RD STREET	19122		5
42430	905	2343 N 06TH STREET	19133		5
42446	905	2640 N HOWARD ST	19133		2
42447	905	2360 N BODINE ST	19133		3
42448	905	2350 N ORKNEY ST	19133		2
42449	905	2352 N ORKNEY ST	19133		2
42452	905	2208 N 05TH STREET	19133		6
42488	905	2351 N ORKNEY ST	19133		2
42489	905	2353 N ORKNEY ST	19133		2
42497	905	2355 N ORKNEY ST	19133		2
42506	905	186 W NORRIS ST	19122		4
42507	905	188 W NORRIS ST	19122		4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
42508	905	2116 N 05TH STREET	19122		3
42533	905	2313 N HOWARD ST	19133		5
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
42589	905	2447 N MARSHALL ST	19133		5
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
42797	905	1432 N LAWRENCE ST	19122		4
42808	905	2336 N BODINE ST	19133		3
42835	905	2024 N BODINE ST	19122		2
42836	905	2030 N BODINE ST	19122		2
42867	905	701 W HUNTINGDON ST	19133	A	3
42868	905	701 W HUNTINGDON ST	19133	B	3
42893	905	2412 N LEITHGOW ST	19133		2
42894	905	2414 N LEITHGOW ST	19133		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
42951	905	1934 N 05TH STREET	19122		5
42966	905	2307 N 07TH STREET	19133	A	2
42967	905	2307 N 07TH STREET	19133	B	4
43019	905	2025 N 03RD STREET	19122		5
43055	905	2416 N 06TH STREET	19133	A	2
43056	905	2416 N 06TH STREET	19133	B	6
43083	905	2249 N 02ND STREET	19133	A	1

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43084	905	2249 N 02ND STREET	19133	B	4
43085	905	2340 N 06TH STREET	19133	A	2
43086	905	2340 N 06TH STREET	19133	B	5
43099	905	2543 MASCHER ST	19133		5
43126	905	2338 N 03RD STREET	19133		5
43127	905	2409 N MARSHALL ST	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
43189	905	410 W HUNTINGDON ST	19133	A	1
43193	905	2331 N 06TH STREET	19133		6
43224	905	2035 N BODINE ST	19122		2
43235	905	1414 N ORIANNA ST	19122		4
43236	905	1416 N ORIANNA ST	19122		4
43237	905	2003 N 05TH STREET	19122	A	1
43238	905	2003 N 05TH STREET	19122	B	4
43255	905	2143 N 04TH STREET	19122		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
43266	905	303 W YORK ST	19133		4
43267	905	443 DIAMOND ST	19122		5
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
43287	905	2251 N 02ND STREET	19133		5
43308	905	2232 N 03RD STREET	19133		5
43329	905	2146 N 04TH STREET	19122		4
43332	905	1623 N 06TH STREET	19122	A	3
43333	905	1623 N 06TH STREET	19122	B	4
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

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43412	905	2322 PALETHORP ST	19133		4
43433	905	2441 N LAWRENCE ST	19133		4
43434	905	2223 N 05TH STREET	19133		4
43435	905	1533 N 06TH STREET	19122	A	3
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
43565	905	2319 N LAWRENCE ST	19133		2
43568	905	728 W HUNTINGDON ST	19133		3
43572	905	307 W NORRIS ST	19122		5
43583	905	2216 N 05TH STREET	19133		5
43617	905	2011 N 03RD STREET	19122		5
43618	905	2341 N 05TH STREET	19133		4
43634	905	2336 N 03RD STREET	19133		5
43636	905	400 W HUNTINGDON ST	19133	A	3
43637	905	400 W HUNTINGDON ST	19133	B	4
43694	905	2208 N LAWRENCE ST	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
43769	905	422 W BERKS ST	19122	A	3
43770	905	422 W BERKS ST	19122	B	3
43803	905	2332 N 07TH STREET	19133	A	4
43804	905	2332 N 07TH STREET	19133	B	3
43805	905	2305 N 06TH STREET	19133	A	2
43806	905	2305 N 06TH STREET	19133	B	4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43807	905	2407 N LAWRENCE ST	19133		4
43845	905	2443 N REESE ST	19133		3
43870	905	2532 N 09TH STREET	19133		3
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
43882	905	703 W CUMBERLAND ST	19133	A	3
43883	905	703 W CUMBERLAND ST	19133	B	4
43900	905	506 W YORK ST	19133		4
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
43973	905	2035 N 04TH STREET	19122		2
43991	905	1900 N. HOWARD STREET	19122	A	1
43992	905	410 W HUNTINGDON ST	19133	B	2
124802	905	642 W HUNTINGDON ST	19133		5
124809	905	1854 N 04TH STREET	19122		5
124814	905	1552 N LAWRENCE ST	19122		4
124817	905	1923 N 05TH STREET	19122		4
124821	905	2405 N LAWRENCE ST	19133		4
124827	905	2453 N LAWRENCE ST	19133		4
124831	905	2240 N LAWRENCE ST	19133		5
124835	905	2367 N 03RD STREET	19133		5
124836	905	2256 N REESE ST	19133		3
124846	905	164 W HUNTINGDON ST	19133		5
124847	905	2222 N 03RD STREET	19133		5
124888	905	316 W HUNTINGDON ST	19133	A	2
124889	905	316 W HUNTINGDON ST	19133	B	3
124890	905	2033 N 03RD STREET	19122		5
124896	905	2127 N 05TH STREET	19122		5
124911	905	2636 N 05TH STREET	19133		5
124917	905	504 W MASTER ST	19122		5
124918	905	2215 N 05TH STREET	19133		4
124926	905	2210 N 05TH STREET	19133		5
124943	905	2157 N 05TH STREET	19122		4
124953	905	2248 N HOWARD ST	19133		5
124954	905	2510 N MARSHALL ST	19133		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
124958	905	327 W SUSQUEHANNA AVE	19122		6
124961	905	1706 N 03RD STREET	19122		5
124964	905	2246 N HOWARD ST	19133		5
124965	905	2106 N 03RD STREET	19122		4
124980	905	1747 N 03RD STREET	19122		5
124992	905	2243 N REESE ST	19133		4
125007	905	2552 N HOWARD ST	19133		5
125010	905	2555 N FRANKLIN ST	19133		5
125018	905	2134 N ORKNEY ST	19122		4
125026	905	2556 N FRANKLIN ST	19133		3
125030	905	1848 N LEITHGOW ST	19122		5
125035	905	436 W NORRIS ST	19122		5
125039	905	403 DIAMOND ST	19122		4
125043	905	2228 N LAWRENCE ST	19133		5
125045	905	733 W CUMBERLAND ST	19133		6
125054	905	2215 N REESE ST	19133		4
125055	905	2227 N REESE ST	19133		5
125069	905	2333 N 5TH ST	19133		5
125080	905	2547 N 07TH STREET	19133		5
125096	905	315 W NORRIS ST	19122		4
125097	905	316 W NORRIS ST	19122		5
125104	905	530 W HUNTINGDON ST	19133		3
125125	905	1830 N 04TH STREET	19122		5
125126	905	430 W NORRIS ST	19122		5
125127	905	2219 N REESE ST	19133		5
125136	905	2455 N 06TH STREET	19133		5
125141	905	1853 N LEITHGOW ST	19122		5
125146	905	317 W NORRIS ST	19122		4
125148	905	2308 N REESE ST	19133		3
125152	905	2542 N HOWARD ST	19133		5
125169	905	2425 N FAIRHILL ST	19133		3
125200	905	2214 N 05TH STREET	19133		5
125201	905	608 W HAROLD ST	19133		3
125203	905	2541 N 07TH STREET	19133		5
125215	905	2309 N 05TH STREET	19133		5
125226	905	440 W NORRIS ST	19122		5
125236	905	520 W YORK ST	19133		5
125239	905	1940 N 03RD STREET	19122		4
125240	905	2104 N 03RD STREET	19122		4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125256	905	2013 N 04TH STREET	19122		4
125268	905	1850 N 04TH STREET	19122		5
125269	905	2128 N REESE ST	19122		2
125279	905	2128 N 05TH STREET	19122		4
125283	905	2526 N HOWARD ST	19133		5
125291	905	2648 N DARIEN ST	19133		2
125305	905	1849 N LEITHGOW ST	19122		5
125306	905	2046 N 05TH STREET	19122		5
125330	905	2528 N 06TH STREET	19133		6
125338	905	1734 N 03RD STREET	19122		5
125343	905	2352 N REESE ST	19133		3
125346	905	570 W DAUPHIN ST	19133		5
125347	905	2409 N LAWRENCE ST	19133		4
125355	905	2551 N ORKNEY ST	19133		2
125358	905	526 MORSE ST	19122		2
125361	905	2534 N 09TH STREET	19133		3
125366	905	1825 N LEITHGOW ST	19122		5
125371	905	642 W CUMBERLAND ST	19133		6
125375	905	2541 N 04TH STREET	19133		3
125379	905	1842 N LEITHGOW ST	19122		5
125385	905	2249 N ORIANNA ST	19133		2
125386	905	510 W MASTER ST	19122		5
125393	905	2213 N REESE ST	19133		4
125401	905	2443 N LAWRENCE ST	19133		4
125402	905	2449 N LAWRENCE ST	19133		4
125418	905	1739 N ORIANNA ST	19122		4
125428	905	2350 N LAWRENCE ST	19133		2
125440	905	2032 N 03RD STREET	19122		5
125456	905	2144 N 04TH STREET	19122		4
125458	905	2405 PALETHORP ST	19133		2
125467	905	2209 N 05TH STREET	19133		4
125475	905	2619 N 08TH STREET	19133		5
125513	905	2021 N 05TH STREET	19122		5
125559	905	2528 N FRANKLIN ST	19133		3
125563	905	1915 N LAWRENCE ST	19122		2
125564	905	1913 N 04TH STREET	19122		4
125571	905	167 W DAUPHIN ST	19133		5
125578	905	185 W NORRIS ST	19122		4
125586	905	2304 N LAWRENCE ST	19133		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125590	905	2141 N HOPE ST	19122		5
125594	905	2332 N BODINE ST	19133		2
125603	905	538 EDGLEY ST	19122		2
125605	905	813 W HUNTINGDON ST	19133		4
125625	905	902 W HUNTINGDON ST	19133		3
125636	905	1826 N 04TH STREET	19122		5
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
125758	905	711 W CUMBERLAND ST	19133		3
125772	905	311 W YORK ST	19133		4
125773	905	2143 N FAIRHILL ST	19122		2
125783	905	2035 N LEITHGOW ST	19122		2
125788	905	2114 N 02ND STREET	19122		5
125796	905	2549 N ORKNEY ST	19133		2
125807	905	2138 N 02ND STREET	19122		5
125808	905	1751 N 03RD STREET	19122		5
125815	905	262 DIAMOND ST	19122		5
125842	905	2234 N 04TH STREET	19133		4
125916	905	2437 N REESE ST	19133		3
125939	905	2453 N 05TH STREET	19133		5
167001	905	2412 N 6TH STREET	19133	A	0
167002	905	2412 N 6TH STREET	19133	B	0
167003	905	2412 N 6TH STREET	19133	C	0
167004	905	2412 N 6TH STREET	19133	D	0
167005	905	302 DIAMOND STREET	19122	A	0
167006	905	302 DIAMOND STREET	19122	B	0
167007	905	302 DIAMOND STREET	19122	C	0
167008	905	302 DIAMOND STREET	19122	D	0
167009	905	303 DIAMOND STREET	19122	A	0
167010	905	303 DIAMOND STREET	19122	B	0
167011	905	303 DIAMOND STREET	19122	C	0
167012	905	303 DIAMOND STREET	19122	D	0
167013	905	304 DIAMOND ST	19122	A	0
167014	905	304 DIAMOND ST	19122	B	0
167015	905	304 DIAMOND ST	19122	C	0

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
167016	905	304 DIAMOND ST	19122	D	0
167017	905	424 DIAMOND ST	19122	A	0
167018	905	424 DIAMOND ST	19122	B	0
167019	905	424 DIAMOND ST	19122	C	0
167020	905	424 DIAMOND ST	19122	D	0
255979	905	2327 N 06TH STREET	19133		5
255986	905	1828 N 04TH STREET	19122		5
255987	905	1848 N 04TH STREET	19122		5
690142	905	2541 N MARSHALL ST	19133		3
690143	905	2525 N MARSHALL ST	19133		3
690144	905	2236 N LAWRENCE ST	19133		5
690145	905	2427 N MARSHALL ST	19133		5
690153	905	2237 N FAIRHILL ST	19133		3
690158	905	2437 N 05TH STREET	19133		5
690176	905	523 W MONTGOMERY AVE	19122		5
690185	905	2123 N 05TH STREET	19122		4
690204	905	2638 N 05TH STREET	19133	A	4
690205	905	2638 N 05TH STREET	19133	B	4
690223	905	2221 N HOWARD ST	19133		5
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
690518	905	2233 N HANCOCK ST	19133		4
690519	905	2256 N HANCOCK ST	19133		4
690600	905	2456 N LAWRENCE ST	19133		3
690613	905	2626 N 07TH STREET	19133		3
690614	905	2648 N 07TH STREET	19133		3
690615	905	2536 N FRANKLIN ST	19133		3
690632	905	2448 N REESE ST	19133		3
690644	905	2622 N 08TH STREET	19133		3
690656	905	2318 MASCHER ST	19133		4
690663	905	2545 N 04TH STREET	19133		3
690675	905	2515 N MARSHALL ST	19133		2
690712	905	2500 N MARSHALL ST	19133		3
690717	905	2007 N 03RD STREET	19122		4
690728	905	2642 N 03RD STREET	19133		3
690740	905	2518 N FRANKLIN ST	19133		3
690771	905	2412 N REESE ST	19133		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690779	905	2521 N 04TH STREET	19133		5
690789	905	2629 N FRANKLIN ST	19133		3
690790	905	2363 N 03RD STREET	19133		4
690795	905	2052 N 03RD STREET	19122		4
690798	905	2534 N 07TH STREET	19133		3
690818	905	2550 N 07TH STREET	19133		5
690831	905	2428 N REESE ST	19133		3
690832	905	2322 N 03RD STREET	19133		4
690833	905	2518 N MARSHALL ST	19133		3
690837	905	2024 N 03RD STREET	19122		6
690846	905	2429 N REESE ST	19133		3
690847	905	2408 N REESE ST	19133		3
690849	905	2506 N MARSHALL ST	19133		3
690850	905	2544 N MARSHALL ST	19133		3
690869	905	2357 N 03RD STREET	19133		4
690870	905	2519 N 05TH STREET	19133		4
690894	905	2549 N MARSHALL ST	19133		2
690900	905	2501 N MARSHALL ST	19133		3
690901	905	2503 N MARSHALL ST	19133		3
690902	905	2505 N MARSHALL ST	19133		3
690913	905	2118 N 03RD STREET	19122		4
690914	905	2547 N MARSHALL ST	19133		2
690918	905	2507 N MARSHALL ST	19133		3
690919	905	2511 N MARSHALL ST	19133		3
690928	905	2513 N MARSHALL ST	19133		3
690950	905	2440 N 04TH STREET	19133		3
690951	905	2454 N LAWRENCE ST	19133		3
690961	905	2527 N 08TH STREET	19133		3
691005	905	2045 N 03RD STREET	19122		5
691006	905	2446 N 04TH STREET	19133		2
691010	905	2520 N 04TH STREET	19133		3
691035	905	904 W HUNTINGDON ST	19133		4
691039	905	2539 N 08TH STREET	19133		4
691041	905	2520 N MARSHALL ST	19133		3
691049	905	2560 N 07TH STREET	19133		5
691066	905	552 W HUNTINGDON ST	19133		5
691091	905	2018 N 03RD STREET	19122		5
691094	905	2431 N REESE ST	19133		3
691095	905	2553 N MARSHALL ST	19133		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
691099	905	2325 N 03RD STREET	19133		5
691108	905	2329 N 03RD STREET	19133		5
691112	905	618 W CUMBERLAND ST	19133		5
691113	905	2502 N MARSHALL ST	19133		3
691125	905	2562 N 08TH STREET	19133		5
691126	905	2504 N MARSHALL ST	19133		3
691132	905	2410 N 05TH STREET	19133		5
691153	905	2350 N 03RD STREET	19133		5
691154	905	2435 N MARSHALL ST	19133		5
691170	905	2511 N 08TH STREET	19133		3
691185	905	2411 N 04TH STREET	19133		5
691190	905	2411 N MARSHALL ST	19133		5
691191	905	2620 N 08TH STREET	19133		3
691192	905	2522 N 09TH STREET	19133		4
691202	905	711 W HUNTINGDON ST	19133		4
691203	905	2416 N REESE ST	19133		3
691240	905	936 W HUNTINGDON ST	19133	A	2
691247	905	2428 N MARSHALL ST	19133		5
691271	905	2320 N 03RD STREET	19133		5
691273	905	2354 N 03RD STREET	19133		4
691298	905	2502 N 06TH STREET	19133	A	2
691299	905	2502 N 06TH STREET	19133	B	4
691309	905	2500 N 06TH STREET	19133	A	2
691310	905	2500 N 06TH STREET	19133	B	4
691319	905	2556 N 09TH STREET	19133		6
691326	905	2328 N 03RD STREET	19133		5
691334	905	2220 N HANCOCK ST	19133		5
691340	905	2232 N LAWRENCE ST	19133		5
691342	905	2216 N LAWRENCE ST	19133		5
691343	905	2238 N LAWRENCE ST	19133		5
691346	905	2638 N 08TH STREET	19133		3
691355	905	2439 N 07TH STREET	19133	A	2
691356	905	2439 N 07TH STREET	19133	B	4
691359	905	2450 N MARSHALL ST	19133	A	4
691360	905	2450 N MARSHALL ST	19133	B	4
691363	905	2234 MASCHER ST	19133		3
691364	905	2016 N 03RD STREET	19122		6
691365	905	2458 N 04TH STREET	19133		5
691390	905	2423 N 05TH STREET	19133		5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
691405	905	2542 N 09TH STREET	19133		3
691413	905	2460 N 04TH STREET	19133		5
691415	905	2663 N DARIEN ST	19133		3
691425	905	2234 N HANCOCK ST	19133		5
691427	905	2043 N 04TH STREET	19122		3
691444	905	2133 N 05TH STREET	19122		4
691449	905	2020 N 03RD STREET	19122		5
691501	905	938 W. HUNTINGDON ST	19133		1
803992	905	2015 N 03RD STREET	19122	A	3
803993	905	2015 N 03RD STREET	19122	B	3
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
804072	905	2435 N 07TH STREET	19133	A	3
804073	905	2435 N 07TH STREET	19133	B	3
804074	905	2435 N 07TH STREET	19133	C	3
804083	905	2149 N 2ND ST	19122		5
804085	905	309 W YORK ST	19133		5
804087	905	2551 N MARSHALL ST	19133		3
804111	905	522 DIAMOND ST	19122		4
804112	905	2400 N 06TH STREET	19133	A	3
804113	905	2400 N 06TH STREET	19133	B	5
804122	905	2146 N 05TH STREET	19122		5
804158	905	2316 N HOWARD ST	19133		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
804184	905	1603 N 6TH ST	19122	# A	2
804185	905	1603 N 6TH ST	19122	# B	5
804201	905	2352 N LAWRENCE ST	19133		2
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
804261	905	1934 N LEITHGOW ST	19122		3
804275	905	309 W NORRIS ST	19122		6

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
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
804308	905	2449 N MARSHALL ST	19133		4
804350	905	1443 N 05TH STREET	19122	A	1
804351	905	1443 N 05TH STREET	19122	B	4
804383	905	2422 N MARSHALL ST	19133	A	1
804384	905	2422 N MARSHALL ST	19133	B	4
804407	905	2110 N 03RD STREET	19122		5
804496	905	1607 N 06TH STREET	19122	A	2
804497	905	1607 N 06TH STREET	19122	B	5
804516	905	2034 N 05TH STREET	19122		3
804528	905	2535 N 06TH STREET	19133	A	2
804529	905	2535 N 06TH STREET	19133	B	3
804530	905	2535 N 06TH STREET	19133	C	1
804544	905	2239 PALETHORP ST	19133		3
804545	905	2243 PALETHORP ST	19133		3
804546	905	2360 PALETHORP ST	19133		3
804559	905	529 W MONTGOMERY AVE	19122	A	3
804560	905	529 W MONTGOMERY AVE	19122	B	3
804561	905	306 W SUSQUEHANNA AVE	19122		5
804577	905	1317 N 06TH STREET	19122	A	3
804578	905	1317 N 06TH STREET	19122	B	4
804586	905	2329 N 06TH STREET	19133	A	3
804587	905	2329 N 06TH STREET	19133	B	2
804601	905	623 W CUMBERLAND ST	19133	A	4
804602	905	623 W CUMBERLAND ST	19133	B	4
804603	905	2019 N 03RD STREET	19122	A	3
804604	905	2019 N 03RD STREET	19122	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
804619	905	2632 N 05TH STREET	19133	A	3
804620	905	2632 N 05TH STREET	19133	B	3
804621	905	1523 N 06TH STREET	19122	A	3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
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
804672	905	303 W SUSQUEHANNA AVE	19122		6
804673	905	305 W SUSQUEHANNA AVE	19122		6
804691	905	1945 MASCHER ST	19122	A	1
804695	905	2539 N HOWARD ST	19133		5
804699	905	933 N 06TH STREET	19123	A	4
804700	905	933 N 06TH STREET	19123	B	3
804703	905	139 W DAUPHIN ST	19133		3
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
804770	905	1945 MASCHER ST	19122	B	3
818013	905	638 W HUNTINGDON ST	19133		5
818016	905	619 W CUMBERLAND ST	19133		5
818019	905	2424 N MARSHALL ST	19133		5
818023	905	527 W BERKS ST	19122		5
818037	905	2619 N 09TH STREET	19133		3
818060	905	733 W HUNTINGDON ST	19133		4
818080	905	2545 N 09TH STREET	19133		3
818087	905	2509 MASCHER ST	19133		5
818097	905	2029 N 03RD STREET	19122		5
818109	905	2544 N 05TH STREET	19133		5
818132	905	2551 N 07TH STREET	19133		5
818142	905	621 W CUMBERLAND ST	19133		5
818143	905	602 W HUNTINGDON ST	19133		5
818150	905	731 W CUMBERLAND ST	19133		6
818170	905	404 W HUNTINGDON ST	19133		5
818181	905	2013 N 05TH STREET	19122		5
818190	905	2554 N 04TH STREET	19133		5
818207	905	2535 N 05TH STREET	19133		3
818223	905	2556 N 08TH STREET	19133		6
818225	905	2037 N 03RD STREET	19122		5
818229	905	541 W BERKS ST	19122		5
818234	905	2413 N MARSHALL ST	19133		5
818235	905	2529 N 04TH STREET	19133		5
818252	905	2323 EMERALD ST	19125		2

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
818261	905	2048 N 5TH ST	19122		5
818269	905	2353 N 03RD STREET	19133		5
818270	905	2416 N 04TH STREET	19133		3
818280	905	2316 N 03RD STREET	19133		3
818287	905	504 W YORK ST	19133		4
818290	905	2513 N 08TH STREET	19133		3
818313	905	35 E SOMERSET ST	19134		5
818323	905	529 W YORK ST	19133		5
818335	905	550 W HUNTINGDON ST	19133		5
818336	905	428 W NORRIS ST	19122		5
818341	905	527 W YORK ST	19133		5
818344	905	2046 N 04TH STREET	19122		4
818360	905	2262 N HANCOCK ST	19133		6
818394	905	314 W HUNTINGDON ST	19133	A	1
818400	905	531 W YORK ST	19133		5
818425	905	2630 N 08TH STREET	19133		3
818437	905	2305 N 07TH STREET	19133		6
818439	905	2209 N HOWARD ST	19133		5
818442	905	935 N 06TH STREET	19123		5
818455	905	114 E HUNTINGDON ST	19125		5
818479	905	2546 N MARSHALL ST	19133		3
818514	905	1824 N 04TH STREET	19122		5
818554	905	314 W HUNTINGDON ST	19133	B	3
857283	905	2558 N 08TH STREET	19133		5
857293	905	2560 N 08TH STREET	19133		5
888739	905	2030 E HUNTINGDON ST	19125		4
926744	905	526 W DAUPHIN ST	19133		4
926749	905	612 W HAROLD ST	19133		3
926751	905	320 W HUNTINGDON ST	19133		3
926752	905	1535 N LAWRENCE ST	19122		5
926753	905	2217 N LAWRENCE ST	19133		2
926755	905	2545 N LAWRENCE ST	19133		2
926757	905	2324 MUTTER ST	19133		2
926769	905	2046 N ORKNEY ST	19122		2
926771	905	2133 N PHILLIP 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
926787	905	2636 N 03RD STREET	19133		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
926789	905	2008 N 04TH STREET	19122		4
926790	905	2407 N 04TH STREET	19133		5
926793	905	2543 N 05TH STREET	19133		3
926794	905	2632 N 08TH STREET	19133		3
41505	906	1817 VINEYARD ST	19130		5
41515	906	1513 N GRATZ ST	19121	A	3
41516	906	1513 N GRATZ ST	19121	B	3
41532	906	1626 PARRISH ST	19130		5
41543	906	869 N 26TH STREET	19130	A	4
41544	906	869 N 26TH STREET	19130	B	4
41546	906	1610 N 17TH STREET	19121		6
41555	906	1612 N 17TH STREET	19121		6
41586	906	837 N 26TH STREET	19130	A	4
41587	906	837 N 26TH STREET	19130	B	4
41590	906	1608 N 17TH STREET	19121	A	3
41591	906	1608 N 17TH STREET	19121	B	6
41592	906	1501 N GRATZ ST	19121	A	4
41593	906	1501 N GRATZ ST	19121	B	3
41628	906	1733 FRANCIS ST	19130	A	2
41629	906	1733 FRANCIS ST	19130	B	3
41630	906	1733 FRANCIS ST	19130	C	3
41704	906	1731 W OXFORD ST	19121	A	4
41705	906	1731 W OXFORD ST	19121	B	4
41740	906	806 N 16TH STREET	19130	A	2
41741	906	806 N 16TH STREET	19130	B	6
41760	906	868 N 20TH STREET	19130		5
041768	906	845 N 20TH STREET	19130	A	1
41769	906	845 N 20TH STREET	19130	B	6
41798	906	1426 W MASTER ST	19121	A	3
41799	906	1426 W MASTER ST	19121	B	3
41800	906	1426 W MASTER ST	19121	C	3
41871	906	1508 N GRATZ ST	19121	A	4
41872	906	1508 N GRATZ ST	19121	B	2
41880	906	1618 PARRISH ST	19130		5
41890	906	1524 BROWN ST	19130	A	1
41891	906	1524 BROWN ST	19130	B	6
41916	906	1432 N 17TH STREET	19121	A	2
41917	906	1432 N 17TH STREET	19121	B	6
41926	906	1935 BROWN ST	19130		5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
41991	906	1625 W STILES ST	19121		5
42118	906	1716 N 16TH STREET	19121	A	3
42119	906	1716 N 16TH STREET	19121	B	3
42124	906	835 N 26TH STREET	19130	A	1
42125	906	835 N 26TH STREET	19130	B	1
42126	906	835 N 26TH STREET	19130	C	1
42141	906	1713 FRANCIS ST	19130		5
42150	906	1704 N GRATZ ST	19121		6
42183	906	909 N 16TH STREET	19130	A	3
42184	906	909 N 16TH STREET	19130	B	3
42185	906	909 N 16TH STREET	19130	C	3
42186	906	1734 N 16TH STREET	19121	A	3
42187	906	1734 N 16TH STREET	19121	B	3
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
42237	906	731 N 17TH STREET	19130	A	2
42238	906	731 N 17TH ST	19130	B	5
42244	906	840 N 16TH STREET	19130		5
42245	906	842 N 16TH STREET	19130		4
42251	906	907 N 16TH STREET	19130	A	3
42252	906	907 N 16TH STREET	19130	B	3
42253	906	907 N 16TH STREET	19130	C	3
42254	906	1722 N 16TH STREET	19121	A	2
42255	906	1722 N 16TH STREET	19121	B	2
42301	906	1724 N 16TH STREET	19121	A	2
42302	906	1724 N 16TH STREET	19121	B	2
42336	906	1304 N 18TH STREET	19121	A	3
42337	906	1304 N 18TH STREET	19121	B	3
42338	906	1509 N GRATZ ST	19121	A	4
42339	906	1509 N GRATZ ST	19121	B	2
42367	906	850 N 20TH STREET	19130	A	2
42368	906	850 N 20TH STREET	19130	B	4
42385	906	843 N 20TH STREET	19130	A	1
42386	906	843 N 20TH STREET	19130	B	6
42413	906	1703 W OXFORD ST	19121	A	2
42414	906	1703 W OXFORD ST	19121	B	3
42415	906	1703 W OXFORD ST	19121	C	3
42454	906	1823 VINEYARD ST	19130		5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
42455	906	1810 W MONTGOMERY AVE	19121		5
42464	906	1507 BROWN ST	19130		4
42470	906	1420 N 17TH STREET	19121	A	1
42471	906	1420 N 17TH STREET	19121	B	3
42472	906	1420 N 17TH STREET	19121	C	3
42481	906	1445 N 17TH STREET	19121	A	2
42482	906	1445 N 17TH STREET	19121	B	3
42483	906	1445 N 17TH STREET	19121	C	3
42502	906	1246 N 18TH STREET	19121		5
42514	906	1426 N 17TH STREET	19121	A	2
42515	906	1426 N 17TH STREET	19121	B	3
42516	906	1426 N 17TH STREET	19121	C	3
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
42596	906	1434 N 17TH STREET	19121	A	2
42597	906	1434 N 17TH STREET	19121	B	3
42598	906	1434 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
42642	906	863 N 20TH STREET	19130	A	2
42643	906	863 N 20TH STREET	19130	B	6
42733	906	1520 MT VERNON ST	19130	A	2
42734	906	1520 MT VERNON ST	19130	B	6
42735	906	1255 N 15TH STREET	19121	A	1
42736	906	1255 N 15TH STREET	19121	B	4
42737	906	1257 N 15TH STREET	19121	A	1
42738	906	1257 N 15TH STREET	19121	B	4
42739	906	1259 N 15TH STREET	19121	A	1
42740	906	1259 N 15TH STREET	19121	B	4
42772	906	844 N 16TH STREET	19130		4
42773	906	1740 VINEYARD ST	19130		5
42784	906	660 N 15TH STREET	19130	A	2
42785	906	660 N 15TH STREET	19130	B	3
42786	906	660 N 15TH STREET	19130	C	3
42787	906	1500 N 18TH STREET	19121	A	3
42788	906	1500 N 18TH STREET	19121	B	5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
42789	906	1500 N 18TH STREET	19121	C	2
42853	906	1617 WALLACE ST	19130	A	3
42854	906	1617 WALLACE ST	19130	B	3
42855	906	1617 WALLACE ST	19130	C	1
42869	906	1523 SEYBERT ST	19121		4
42940	906	1546 N GRATZ ST	19121	A	4
42941	906	1546 N GRATZ ST	19121	B	3
42998	906	1215 MT VERNON ST	19123	A	3
42999	906	1215 MT VERNON ST	19123	B	4
43000	906	1215 MT VERNON ST	19123	C	3
43034	906	1812 FRANCIS ST	19130		3
43036	906	1537 N GRATZ ST	19121	A	3
43037	906	1537 N GRATZ ST	19121	B	3
43046	906	1922 BROWN ST	19130		5
43078	906	834 LELAND ST	19130		5
43080	906	1748 VINEYARD ST	19130		4
43102	906	1746 VINEYARD ST	19130		5
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
43184	906	857 N UBER ST	19130		5
43190	906	872 N 19TH STREET	19130	A	1
43191	906	872 N 19TH STREET	19130	B	5
43231	906	1411 W JEFFERSON ST	19121	A	3
43232	906	1411 W JEFFERSON ST	19121	B	4
43262	906	1649 FRANCIS ST	19130		5
43291	906	728 N 16TH STREET	19130	A	5
43292	906	728 N 16TH STREET	19130	B	4
43310	906	1612 W STILES ST	19121		4
43345	906	914 N 17TH STREET	19130	A	2
43346	906	914 N 17TH STREET	19130	B	3
43347	906	914 N 17TH STREET	19130	C	3
43348	906	916 N 17TH STREET	19130	A	2
43349	906	916 N 17TH STREET	19130	B	3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43350	906	916 N 17TH STREET	19130	C	3
43351	906	918 N 17TH STREET	19130	A	3
43352	906	918 N 17TH STREET	19130	B	3
43353	906	918 N 17TH STREET	19130	C	4
43370	906	707 N 18TH STREET	19130	A	1
43371	906	707 N 18TH STREET	19130	B	3
43381	906	1613 WALLACE ST	19130	A	3
43382	906	1613 WALLACE ST	19130	B	3
43383	906	1613 WALLACE ST	19130	C	3
43399	906	1732 N 16TH STREET	19121	A	3
43400	906	1732 N 16TH STREET	19121	B	3
43428	906	713 N 19TH STREET	19130		3
43444	906	723 N 20TH STREET	19130	A	1
43445	906	723 N 20TH STREET	19130	B	3
43446	906	723 N 20TH STREET	19130	C	3
43461	906	863 PERKIOMEN ST	19130	A	3
43462	906	863 PERKIOMEN ST	19130	B	4
43523	906	1433 N 18TH STREET	19121	A	2
43524	906	1433 N 18TH ST	19121	B	4
43525	906	761 N CORINTHIAN AVE	19130	A	3
43526	906	761 N CORINTHIAN AVE	19130	B	3
43527	906	761 N CORINTHIAN AVE	19130	C	3
43537	906	1508 N 18TH STREET	19121	A	3
43538	906	1508 N 18TH STREET	19121	B	3
43539	906	1508 N 18TH STREET	19121	C	3
43622	906	1517 N GRATZ ST	19121	A	4
43623	906	1517 N GRATZ ST	19121	B	2
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
43653	906	1527 N GRATZ ST	19121	A	3
43654	906	1527 N GRATZ ST	19121	B	3
43666	906	763 N CORINTHIAN AVE	19130	A	3
43667	906	763 N CORINTHIAN AVE	19130	B	3
43668	906	763 N CORINTHIAN AVE	19130	C	3
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

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43683	906	1027 MT VERNON ST	19123	A	4
43684	906	1027 MT VERNON ST	19123	B	5
43685	906	1515 N GRATZ ST	19121	A	3
43686	906	1515 N GRATZ ST	19121	B	3
43739	906	1925 BROWN ST	19130		4
43791	906	1714 FOLSOM ST	19130		5
43810	906	1527 POPLAR ST	19130	A	3
43811	906	1527 POPLAR ST	19130	B	3
43812	906	1527 POPLAR ST	19130	C	3
43813	906	1529 POPLAR ST	19130	A	2
43814	906	1529 POPLAR ST	19130	B	3
43815	906	1529 POPLAR ST	19130	C	3
43816	906	748 N 19TH STREET	19130	A	2
43817	906	748 N 19TH STREET	19130	B	3
43818	906	748 N 19TH STREET	19130	C	3
43821	906	2023 OGDEN ST	19130		5
43822	906	737 N CORINTHIAN AVE	19130	A	3
43823	906	737 N CORINTHIAN AVE	19130	B	3
43824	906	737 N CORINTHIAN AVE	19130	C	3
43848	906	1407 N 18TH STREET	19121	A	2
43849	906	1407 N 18TH STREET	19121	B	3
43850	906	1407 N 18TH STREET	19121	C	3
43851	906	730 N 19TH STREET	19130	A	2
43852	906	730 N 19TH STREET	19130	B	4
43890	906	1413 N 18TH STREET	19121	A	2
43891	906	1413 N 18TH STREET	19121	B	3
43892	906	1413 N 18TH STREET	19121	C	3
43896	906	867 N TANEY ST	19130		2
43924	906	1405 N 18TH STREET	19121	A	2
43925	906	1405 N 18TH STREET	19121	B	3
43926	906	1405 N 18TH STREET	19121	C	3
43927	906	1411 N 18TH STREET	19121	A	3
43928	906	1411 N 18TH STREET	19121	B	3
43929	906	1411 N 18TH STREET	19121	C	3
43933	906	1609 N 16TH STREET	19121	A	3
43934	906	1609 N 16TH STREET	19121	B	3
43935	906	1609 N 16TH STREET	19121	C	3
43959	906	626 N 10TH STREET	19123	A	3
43960	906	626 N 10TH STREET	19123	B	3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
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
43989	906	1722 N 16TH STREET	19121	C	2
43990	906	1724 N 16TH STREET	19121	C	2
124882	906	823 LELAND ST	19130		5
124885	906	2934 OGDEN ST	19130		4
124887	906	1605 W STILES ST	19121		5
124891	906	1625 N BOUVIER ST	19121		5
124897	906	1615 N 18TH STREET	19121	A	1
124898	906	1615 N 18TH STREET	19121	B	4
124910	906	1933 BROWN ST	19130		5
124912	906	1418 N 17TH STREET	19121	A	4
124913	906	1418 N 17TH STREET	19121	B	4
124927	906	1720 N GRATZ ST	19121		5
124933	906	1512 N GRATZ ST	19121	A	3
124948	906	1606 N SYDENHAM ST	19121		5
124957	906	820 LELAND ST	19130		5
124959	906	863 N CORINTHIAN AVE	19130		5
125000	906	1918 NORTH ST	19130		5
125038	906	845 PERKIOMEN ST	19130		5
125040	906	1808 INGERSOLL ST	19121		4
125063	906	1601 WILLINGTON ST	19121		4
125074	906	1619 W FLORA ST	19121		4
125137	906	1639 W STILES ST	19121		4
125150	906	1521 SWAIN ST	19130		5
125156	906	1630 PARRISH ST	19130		5
125175	906	1716 INGERSOLL ST	19121		4
125185	906	1835 INGERSOLL ST	19121		3
125231	906	1515 SWAIN ST	19130		5
125243	906	822 LELAND ST	19130		4
125292	906	1617 W FLORA ST	19121		4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125310	906	1723 SEYBERT ST	19121		2
125333	906	1827 POPLAR ST	19130		3
125336	906	1737 W THOMPSON ST	19121		4
125344	906	816 PERKIOMEN ST	19130		4
125369	906	1824 W THOMPSON ST	19121		5
125378	906	874 N 20TH STREET	19130		5
125415	906	812 N TANEY ST	19130		5
125417	906	1727 W THOMPSON ST	19121		5
125420	906	814 N TANEY ST	19130		5
125432	906	816 N TANEY ST	19130		5
125468	906	806 N TANEY ST	19130		4
125495	906	1748 WYLIE ST	19130		5
125518	906	1920 BROWN ST	19130		5
125718	906	1625 SWAIN ST	19130		6
125744	906	2032 POPLAR ST	19130		4
125762	906	1721 N 16TH STREET	19121	A	2
125801	906	826 N 20TH STREET	19130		6
125847	906	1634 FRANCIS ST	19130		5
125855	906	1830 W THOMPSON ST	19121		5
125858	906	806 N CORINTHIAN AVE	19130		6
125905	906	1820 POPLAR ST	19130		3
125945	906	1721 N 16TH STREET	19121	B	3
168001	906	1405 N 17TH STREET	19121	A	0
168002	906	1405 N 17TH STREET	19121	B	0
168003	906	1405 N 17TH STREET	19121	C	0
168004	906	1405 N 17TH STREET	19121	D	0
168005	906	1622 W OXFORD STREET	19121	A	0
168006	906	1622 W OXFORD STREET	19121	B	0
168007	906	1622 W OXFORD STREET	19121	C	0
168008	906	1622 W OXFORD STREET	19121	D	0
168009	906	719 N 17TH STREET	19130	A	0
168010	906	719 N 17TH STREET	19130	B	0
168011	906	719 N 17TH STREET	19130	C	0
168012	906	719 N 17TH STREET	19130	D	0
168013	906	1241 N 15TH STREET	19121	A	0
168014	906	1241 N 15TH STREET	19121	B	0
168015	906	1241 N 15TH STREET	19121	C	0
168016	906	1241 N 15TH STREET	19121	D	0
168017	906	1424 POPLAR ST	19130	A	0

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
168018	906	1424 POPLAR ST	19130	B	0
168019	906	1424 POPLAR ST	19130	C	0
168020	906	1424 POPLAR ST	19130	D	0
255970	906	1725 N 16TH STREET	19121	A	2
255975	906	1743 N GRATZ ST	19121		5
255984	906	1923 BROWN ST	19130		4
255995	906	1725 N 16TH STREET	19121	B	3
690045	906	856 N 27TH STREET	19130		3
690147	906	1620 N 17TH STREET	19121		6
690151	906	1743 W THOMPSON ST	19121		5
690156	906	1725 W MASTER ST	19121	A	2
690157	906	1725 W MASTER ST	19121	B	5
690196	906	1404 WILLINGTON ST	19121		5
690224	906	723 N 17TH STREET	19130	A	3
690225	906	723 N 17TH STREET	19130	B	4
690273	906	617 N 17TH STREET	19130	A	4
690274	906	617 N 17TH ST	19130	B	4
690289	906	1424 N 17TH STREET	19121	A	3
690290	906	1424 N 17TH STREET	19121	B	3
690291	906	1424 N 17TH STREET	19121	C	3
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
690297	906	1430 N 17TH STREET	19121	A	3
690298	906	1430 N 17TH STREET	19121	B	3
690299	906	1430 N 17TH STREET	19121	C	2
690300	906	1523 N 19TH STREET	19121	A	2
690301	906	1523 N 19TH STREET	19121	B	3
690302	906	1523 N 19TH 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
690347	906	1708 W OXFORD ST	19121	A	2
690348	906	1708 W OXFORD ST	19121	B	3
690349	906	1708 W OXFORD ST	19121	C	3
690353	906	1624 WALLACE ST	19130	A	4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690354	906	1624 WALLACE ST	19130	B	3
690355	906	1624 WALLACE ST	19130	C	4
690361	906	1614 WALLACE ST	19130	A	4
690362	906	1614 WALLACE ST	19130	B	3
690363	906	1614 WALLACE ST	19130	C	4
690379	906	1517 N 19TH STREET	19121	A	2
690380	906	1517 N 19TH STREET	19121	B	3
690381	906	1517 N 19TH STREET	19121	C	3
690393	906	603 N 18TH STREET	19130	A	2
690394	906	603 N 18TH STREET	19130	B	5
690398	906	727 N CORINTHIAN AVE	19130	A	2
690399	906	727 N CORINTHIAN AVE	19130	B	2
690400	906	727 N CORINTHIAN AVE	19130	C	2
690425	906	1730 WALLACE ST	19130	A	3
690426	906	1730 WALLACE ST	19130	B	3
690427	906	1730 WALLACE ST	19130	C	3
690436	906	1834 GREEN ST	19130	A	4
690437	906	1834 GREEN ST	19130	B	4
690439	906	634 N 17TH STREET	19130	A	4
690440	906	634 N 17TH STREET	19130	B	5
690458	906	1622 WALLACE ST	19130	A	4
690459	906	1622 WALLACE ST	19130	B	3
690460	906	1622 WALLACE ST	19130	C	4
690921	906	1623 WALLACE ST	19130	A	3
690922	906	1623 WALLACE ST	19130	B	3
690923	906	1623 WALLACE ST	19130	C	3
690945	906	1608 BROWN ST	19130	A	1
690946	906	1610 BROWN ST	19130		6
690947	906	1612 BROWN ST	19130		6
690979	906	1610 PARRISH ST	19130		4
691007	906	1628 WALLACE ST	19130	A	3
691008	906	1628 WALLACE ST	19130	B	3
691009	906	1628 WALLACE ST	19130	C	3
691022	906	1630 WALLACE ST	19130	A	3
691023	906	1630 WALLACE ST	19130	B	3
691024	906	1630 WALLACE ST	19130	C	3
691043	906	1626 WALLACE ST	19130	A	3
691044	906	1626 WALLACE ST	19130	B	3
691045	906	1626 WALLACE ST	19130	C	3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
691279	906	1726 WYLIE ST	19130		5
691287	906	812 N 20TH STREET	19130		6
691327	906	1705 MT VERNON ST	19130	A	2
691328	906	1705 MT VERNON ST	19130	B	3
691329	906	1705 MT VERNON ST	19130	C	3
691374	906	1718 WALLACE ST	19130	A	2
691375	906	1718 WALLACE ST	19130	B	3
691376	906	1718 WALLACE ST	19130	C	3
691386	906	869 N 23RD STREET	19130	A	3
691387	906	869 N 23RD STREET	19130	B	4
691399	906	852 N 23RD STREET	19130	A	4
691400	906	852 N 23RD STREET	19130	B	3
691401	906	1932 GREEN ST	19130	A	3
691402	906	1932 GREEN ST	19130	B	3
691403	906	1932 GREEN ST	19130	C	3
691440	906	1614 N 17TH STREET	19121		6
691506	906	1608 BROWN ST	19130	B	4
803994	906	622 N 10TH STREET	19123	A	4
803995	906	622 N 10TH STREET	19123	B	4
804022	906	1401 N 18TH STREET	19121	A	3
804023	906	1401 N 18TH STREET	19121	B	3
804024	906	1401 N 18TH STREET	19121	C	3
804045	906	859 N 26TH STREET	19130	A	1
804046	906	859 N 26TH STREET	19130	B	1
804047	906	859 N 26TH STREET	19130	C	1
804049	906	1545 N GRATZ ST	19121	A	4
804050	906	1545 N GRATZ ST	19121	B	2
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
804101	906	1712 N 16TH STREET	19121	A	2
804102	906	1712 N 16TH STREET	19121	B	2
804103	906	1712 N 16TH STREET	19121	C	2
804104	906	846 N 20TH STREET	19130	A	1
804105	906	846 N 20TH ST	19130	B	4
804124	906	853 PERKIOMEN ST	19130	A	2
804125	906	853 PERKIOMEN ST	19130	B	3
804153	906	1533 N 17TH STREET	19121	A	3
804154	906	1533 N 17TH STREET	19121	B	4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
804155	906	1533 N 17TH STREET	19121	C	3
804238	906	1722 N GRATZ ST	19121		5
804243	906	1603 WALLACE ST	19130	A	3
804244	906	1603 WALLACE ST	19130	B	3
804245	906	1603 WALLACE ST	19130	C	3
804251	906	737 N 20TH STREET	19130	A	1
804252	906	737 N 20TH STREET	19130	B	3
804253	906	737 N 20TH STREET	19130	C	3
804279	906	1524 N 18TH STREET	19121	A	3
804280	906	1524 N 18TH STREET	19121	B	3
804281	906	1524 N 18TH STREET	19121	C	3
804291	906	858 N 19TH STREET	19130	A	3
804292	906	858 N 19TH STREET	19130	B	3
804293	906	844 N 20TH STREET	19130	A	1
804294	906	844 N 20TH STREET	19130	B	2
804336	906	1830 W GIRARD AVE	19130	A	4
804337	906	1830 W GIRARD AVE	19130	B	5
804338	906	1705 N 18TH STREET	19121	A	4
804339	906	1705 N 18TH STREET	19121	B	4
804362	906	723 N CORINTHIAN AVE	19130	A	2
804363	906	723 N CORINTHIAN AVE	19130	B	3
804364	906	723 N CORINTHIAN AVE	19130	C	3
804365	906	826 N CORINTHIAN AVE	19130	A	4
804366	906	826 N CORINTHIAN AVE	19130	B	4
804371	906	1502 N 18TH STREET	19121	A	2
804372	906	1502 N 18TH STREET	19121	B	6
804388	906	1422 N 17TH STREET	19121	A	4
804389	906	1422 N 17TH STREET	19121	B	4
804390	906	1713 W MASTER ST	19121	A	3
804391	906	1713 W MASTER ST	19121	B	3
804392	906	1713 W MASTER ST	19121	C	3
804393	906	841 N 20TH STREET	19130	A	3
804394	906	841 N 20TH STREET	19130	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
804423	906	849 N 20TH STREET	19130	A	1
804424	906	849 N 20TH STREET	19130	B	4
804466	906	1629 FRANCIS ST	19130		6

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
804509	906	1503 N GRATZ ST	19121	A	4
804510	906	1503 N GRATZ ST	19121	B	2
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
804540	906	1726 N 16TH STREET	19121	A	1
804541	906	1726 N 16TH STREET	19121	B	2
804542	906	1726 N 16TH STREET	19121	C	2
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
804626	906	1724 WALLACE ST	19130	A	3
804627	906	1724 WALLACE ST	19130	B	3
804628	906	1724 WALLACE ST	19130	C	3
804637	906	847 N 20TH STREET	19130	A	3
804638	906	847 N 20TH STREET	19130	B	4
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
804662	906	1513 N 19TH STREET	19121	A	2
804663	906	1513 N 19TH STREET	19121	B	3
804664	906	1513 N 19TH STREET	19121	C	3
804680	906	1107 WALLACE ST	19123	A	4
804681	906	1107 WALLACE ST	19123	B	4
804682	906	1427 N 18TH STREET	19121	A	4
804683	906	1427 N 18TH STREET	19121	B	4
804714	906	1618 N 17TH STREET	19121	A	4
804715	906	1618 N 17TH STREET	19121	B	5
804728	906	1633 N BOUVIER ST	19121		5
804744	906	1821 VINEYARD ST	19130		5
804750	906	1511 N 19TH STREET	19121	A	3
804751	906	1511 N 19TH STREET	19121	B	2
804752	906	1511 N 19TH STREET	19121	C	2

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
804761	906	1531 N GRATZ ST	19121	A	3
804762	906	1531 N GRATZ ST	19121	B	3
818044	906	868 N UBER ST	19130		4
818045	906	870 N UBER ST	19130		4
818075	906	1632 PARRISH ST	19130		5
818088	906	1651 FRANCIS ST	19130		6
818146	906	1620 W STILES ST	19121		5
818210	906	851 N CORINTHIAN AVE	19130		5
818271	906	872 N UBER ST	19130		4
818304	906	2029 PARRISH ST	19130		4
818309	906	1730 N GRATZ ST	19121		4
818359	906	861 N UBER ST	19130		5
818367	906	864 N UBER ST	19130		4
818440	906	1707 W THOMPSON ST	19121		5
857284	906	810 N 23RD STREET	19130		5
888584	906	1723 W THOMPSON ST	19121		5
41519	907	1717 N MARSHALL ST	19122		4
41534	907	2123 N 08TH STREET	19122		5
41535	907	2530 N JESSUP ST	19133		3
41541	907	1951 N MARSHALL ST	19122		5
41564	907	2542 N JESSUP ST	19133		3
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
41627	907	2536 N 12TH ST	19133		4
41662	907	1418 N FRANKLIN ST	19122		6
41674	907	2518 N 11TH ST	19133	A	2
41675	907	2518 N 11TH ST	19133	B	2
41703	907	2042 N DARIEN ST	19122		2
41717	907	605 W MONTGOMERY AVE	19122		5
41728	907	2113 N 7TH ST	19122		6
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
41739	907	2149 N 08TH STREET	19122		5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
41753	907	1610 N MARSHALL ST	19122		6
41773	907	1609 N 8TH ST	19122		4
41776	907	1504 N 07TH STREET	19122		5
41777	907	2007 N MARSHALL ST	19122		5
41779	907	2142 N MARSHALL ST	19122		4
41811	907	1746 N MARSHALL ST	19122		4
41815	907	928 W YORK ST	19133		4
41829	907	1754 N 6TH ST	19122		4
41878	907	1542 N 07TH STREET	19122	A	2
41879	907	1542 N 07TH STREET	19122	B	6
41899	907	2004 N DARIEN ST	19122		2
41900	907	2008 N DARIEN ST	19122		2
41901	907	2024 N DARIEN ST	19122		2
41929	907	1521 N 7TH ST	19122	A	3
41930	907	1521 N 7TH ST	19122	B	3
41931	907	1521 N 07TH STREET	19122	C	2
41950	907	2137 N 09TH STREET	19122		5
41951	907	1756 N MARSHALL ST	19122		5
41952	907	2035 N 08TH STREET	19122	A	1
41967	907	1516 N 07TH STREET	19122	A	2
41968	907	1516 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
41976	907	2228 N FRANKLIN ST	19133		3
42023	907	1514 N 07TH STREET	19122	A	2
42024	907	1514 N 07TH STREET	19122	B	6
42056	907	715 W MONTGOMERY AVE	19122		5
42058	907	1339 N 08TH STREET	19122		6
42059	907	2353 N 10TH STREET	19133		5
42060	907	2527 N 12TH STREET	19133		5
42072	907	2162 N FRANKLIN ST	19122		5
42134	907	1446 N MARSHALL ST	19122		6
42138	907	2351 N 10TH STREET	19133		5
42139	907	2547 N 11TH STREET	19133		5
42166	907	2411 N 10TH STREET	19133		5
42177	907	1444 N MARSHALL ST	19122	A	2
42178	907	1444 N MARSHALL ST	19122	B	6

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
42193	907	1550 N DARIEN ST	19122		2
42198	907	2309 N 10TH STREET	19133	A	1
42199	907	2309 N 10TH STREET	19133	B	4
42210	907	1754 N MARSHALL ST	19122		4
42235	907	2311 N 10TH STREET	19133	A	1
42236	907	2311 N 10TH STREET	19133	B	4
42240	907	1416 N MARSHALL ST	19122	A	2
42241	907	1416 N MARSHALL ST	19122	B	6
42242	907	1218 W SERGEANT ST	19133		3
42300	907	2507 N 11TH STREET	19133		5
42350	907	2008 N 08TH STREET	19122	A	2
42351	907	2008 N 08TH STREET	19122	B	5
42355	907	2151 N 08TH STREET	19122		6
42382	907	1539 N 09TH STREET	19122		4
42383	907	1543 N 09TH STREET	19122		5
42384	907	2320 N 09TH STREET	19133		3
42404	907	1824 N 06TH STREET	19122		5
42408	907	611 W JEFFERSON ST	19122		3
42409	907	2425 N 10TH STREET	19133	A	1
42410	907	2425 N 10TH STREET	19133	B	4
42431	907	2006 N 08TH STREET	19122		6
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
42492	907	2230 N FRANKLIN ST	19133		2
42509	907	733 W MONTGOMERY AVE	19122		5
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
42547	907	1713 N MARSHALL ST	19122		5
42561	907	1812 N FRANKLIN ST	19122	A	3
42562	907	1812 N FRANKLIN ST	19122	B	3
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

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
42566	907	1816 N FRANKLIN ST	19122	C	3
42572	907	2500 N ALDER ST	19133		2
42609	907	1304 N MARSHALL ST	19122		5
42616	907	1810 N MARSHALL ST	19122		4
42667	907	2627 N 13TH STREET	19133		5
42716	907	1309 N 07TH STREET	19122	A	2
42717	907	1309 N 07TH STREET	19122	B	3
42718	907	1311 N 07TH STREET	19122	A	1
42719	907	1311 N 07TH STREET	19122	B	3
42757	907	2132 N MARSHALL ST	19122		4
42798	907	1412 N MARSHALL ST	19122	A	2
42799	907	1412 N MARSHALL ST	19122	B	6
42809	907	2510 N 11TH STREET	19133		6
42824	907	2107 N 08TH STREET	19122	A	1
42852	907	1727 N MARSHALL ST	19122		5
42879	907	2136 N 08TH STREET	19122		5
42898	907	1633 N MARSHALL ST	19122	A	2
42899	907	1633 N MARSHALL ST	19122	B	4
42911	907	1523 N 07TH STREET	19122	A	2
42912	907	1523 N 07TH STREET	19122	B	4
42934	907	603 W NORRIS ST	19122		6
42970	907	1015 W ARIZONA ST	19133		2
42971	907	1232 W YORK ST	19133		3
43033	907	1406 N 07TH STREET	19122		4
43100	907	2158 N 08TH STREET	19122		6
43158	907	1518 N DARIEN ST	19122		2
43192	907	625 W JEFFERSON ST	19122		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
43259	907	2306 N PARK AVE	19132	A	3
43260	907	2306 N PARK AVE	19132	B	2
43261	907	2306 N PARK AVE	19132	C	3
43269	907	1614 N MARSHALL ST	19122	A	3
43270	907	1614 N MARSHALL ST	19122	B	3
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

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43318	907	2052 N MARSHALL ST	19122		5
43375	907	1322 N 06TH STREET	19122	A	2
43376	907	1322 N 06TH STREET	19122	B	5
43419	907	2513 N ALDER ST	19133		2
43442	907	2438 N PARK AVE	19132		6
43476	907	1614 N 06TH STREET	19122	A	1
43477	907	1614 N 06TH STREET	19122	B	4
43480	907	929 W YORK ST	19133		5
43492	907	2504 N 10TH STREET	19133		5
43493	907	2621 N JESSUP ST	19133		5
43521	907	1651 N MARSHALL ST	19122		4
43550	907	1234 W HUNTINGDON ST	19133	A	3
43551	907	1234 W HUNTINGDON ST	19133	B	3
43589	907	931 W DAUPHIN ST	19133		5
43630	907	906 W SUSQUEHANNA AVE	19122		5
43638	907	1705 N MARSHALL ST	19122		4
43640	907	1309 W SUSQUEHANNA AVE	19122	A	4
43641	907	1309 W SUSQUEHANNA AVE	19122	B	4
43707	907	1652 N MARSHALL ST	19122	A	4
43708	907	1652 N MARSHALL ST	19122	B	3
43709	907	1311 W SUSQUEHANNA AVE	19122	A	3
43710	907	1311 W SUSQUEHANNA AVE	19122	B	4
43735	907	713 W MONTGOMERY AVE	19122		5
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
43772	907	2062 N FRANKLIN ST	19122		5
43783	907	1913 N 09TH STREET	19122		5
43809	907	618 DIAMOND ST	19122		5
43830	907	1654 N MARSHALL ST	19122	A	3
43831	907	1654 N MARSHALL ST	19122	B	3
43866	907	1834 N MARSHALL ST	19122		2
43867	907	735 W MONTGOMERY AVE	19122		5
43901	907	1612 N MARSHALL ST	19122	A	3
43902	907	1612 N MARSHALL ST	19122	B	3
43903	907	1616 N MARSHALL ST	19122	A	3
43904	907	1616 N MARSHALL ST	19122	B	3
43942	907	617 W JEFFERSON ST	19122		4
43943	907	619 W JEFFERSON ST	19122		4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43994	907	2035 N 08TH STREET	19122	B	3
43995	907	2107 N 08TH STREET	19122	B	3
56505	907	2143 N 08TH STREET	19122		4
56506	907	2145 N 08TH STREET	19122		4
56507	907	2139 N 08TH STREET	19122		4
56508	907	2141 N 08TH STREET	19122		4
56509	907	1215 W OXFORD ST	19122		4
56510	907	1217 W OXFORD ST	19122		4
56512	907	1221 W OXFORD ST	19122		4
124804	907	2171 N FRANKLIN ST	19122		5
124805	907	817 DIAMOND ST	19122		5
124806	907	906 W YORK ST	19133		3
124820	907	1729 N MARSHALL ST	19122		5
124863	907	2614 N 12TH STREET	19133		6
124868	907	2025 N 08TH STREET	19122		5
124894	907	1517 N 07TH STREET	19122	A	4
124895	907	1517 N 07TH STREET	19122	B	4
124899	907	1250 W HAZZARD ST	19133		3
124932	907	2207 N 07TH STREET	19133		5
124951	907	921 W DAUPHIN ST	19133		6
124976	907	2208 N 10TH STREET	19133		4
124985	907	2537 N 11TH STREET	19133		5
124986	907	2539 N 11TH STREET	19133		5
124987	907	2541 N 11TH STREET	19133		5
125015	907	2229 N 10TH STREET	19133		4
125024	907	2111 N FRANKLIN ST	19122		4
125031	907	1210 N 07TH STREET	19122	A	5
125032	907	1210 N 07TH STREET	19122	B	5
125036	907	2165 N FRANKLIN ST	19122		4
125058	907	2622 N 12TH STREET	19133		4
125062	907	2257 N CAMAC ST	19133		4
125073	907	2439 N 10TH STREET	19133		6
125088	907	612 WESTMONT ST	19122		2
125089	907	613 WESTMONT ST	19122		2
125090	907	614 WESTMONT ST	19122		2
125091	907	615 WESTMONT ST	19122		2
125092	907	616 WESTMONT ST	19122		2
125093	907	617 WESTMONT ST	19122		2
125094	907	618 WESTMONT ST	19122		2

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125095	907	619 WESTMONT ST	19122		2
125106	907	2315 N FAWN ST	19133		3
125112	907	2042 N FRANKLIN ST	19122		5
125128	907	2345 N FAWN ST	19133		3
125149	907	2606 N 12TH STREET	19133		6
125164	907	606 CECIL B MOORE AVE	19122		4
125165	907	608 CECIL B MOORE AVE	19122		4
125168	907	1715 N MARSHALL ST	19122		5
125170	907	1930 N 07TH STREET	19122	A	2
125171	907	1930 N 07TH STREET	19122	B	5
125182	907	1252 W HAZZARD ST	19133		3
125193	907	1928 N 07TH STREET	19122	A	5
125194	907	1928 N 07TH STREET	19122	B	5
125211	907	2203 N FRANKLIN ST	19133		3
125227	907	2229 N FRANKLIN ST	19133		5
125229	907	2448 N DELHI ST	19133		2
125265	907	2212 N FRANKLIN ST	19133		6
125280	907	2214 N FRANKLIN ST	19133		5
125281	907	2323 N FAWN ST	19133		3
125286	907	1820 N 06TH STREET	19122		5
125307	907	2523 N 11TH STREET	19133		5
125348	907	2538 N ALDER ST	19133		3
125365	907	2518 N SARTAIN ST	19133		3
125399	907	1222 W YORK ST	19133		3
125443	907	1732 N MARSHALL ST	19122		5
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
125576	907	1848 N MARSHALL ST	19122		2
125595	907	2163 N 08TH STREET	19122		5
125604	907	2243 N FRANKLIN ST	19133		6
125614	907	1425 N 08TH STREET	19122		6
125617	907	2352 N CAMAC ST	19133		3
125626	907	1021 W DAKOTA ST	19133		3
125648	907	919 W ARIZONA ST	19133		3
125659	907	608 W NORRIS ST	19122		5
125668	907	1030 W ARIZONA ST	19133		2
125669	907	1436 N FRANKLIN ST	19122		6

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125680	907	2144 N FRANKLIN ST	19122		4
125694	907	1547 N 09TH STREET	19122		5
125703	907	2331 N FAWN ST	19133		3
125734	907	2108 N PERCY ST	19122		2
125742	907	1221 W SERGEANT ST	19133		3
125745	907	2330 N FAWN ST	19133		3
125751	907	2148 N 08TH STREET	19122		5
125765	907	2450 N DELHI ST	19133		2
125771	907	2303 N FAWN ST	19133		3
125813	907	2109 N 08TH STREET	19122		5
125814	907	822 W OXFORD ST	19122		5
125828	907	2512 N 10TH STREET	19133		5
125930	907	1648 N MARSHALL ST	19122		6
125937	907	636 DIAMOND ST	19122		5
125940	907	2337 N FAWN ST	19133		3
135028	907	1400 N MARSHALL ST	19122		3
135029	907	1402 N MARSHALL ST	19122		3
135030	907	1422 N MARSHALL ST	19122		3
135031	907	1424 N MARSHALL ST	19122		3
135032	907	1426 N MARSHALL ST	19122		3
135033	907	1428 N MARSHALL ST	19122		3
135038	907	1506 N MARSHALL ST	19122		4
135039	907	1508 N MARSHALL ST	19122		4
135040	907	1510 N MARSHALL	19122		4
135041	907	1512 N MARSHALL ST	19122		4
135042	907	1505 N MARSHALL ST	19122	A	3
135043	907	1505 N MARSHALL ST	19122	B	2
135044	907	1507 N MARSHALL ST	19122	A	3
135045	907	1507 N MARSHALL ST	19122	B	2
135046	907	1509 N MARSHALL ST	19122		3
135047	907	1511 N MARSHALL ST	19122		3
135048	907	1513 N MARSHALL ST	19122	A	3
135049	907	1513 N MARSHALL ST	19122	B	2
135050	907	1515 N MARSHALL ST	19122	A	3
135051	907	1515 N MARSHALL ST	19122	B	2
135052	907	1517 N MARSHALL ST	19122		3
135053	907	1519 N MARSHALL ST	19122		3
135054	907	1521 N MARSHALL ST	19122		3
135055	907	1523 N MARSHALL ST	19122		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
135056	907	627 W JEFFERSON ST	19122	A	3
135057	907	627 W JEFFERSON ST	19122	B	3
135058	907	629 W JEFFERSON ST	19122	A	3
135059	907	629 W JEFFERSON ST	19122	B	3
135064	907	1508 N 6TH ST	19122		3
135065	907	1510 N 6TH ST	19122		3
135066	907	1512 N 6TH ST	19122		3
135067	907	1514 N 6TH ST	19122		3
135068	907	1516 N 6TH ST	19122		3
135069	907	1518 N 6TH ST	19122		3
135070	907	1520 N 6TH ST	19122		3
135071	907	1522 N 6TH ST	19122		3
135072	907	1524 N 6TH ST	19122		3
135073	907	1526 N 6TH ST	19122		4
135074	907	2300 N 13TH STREET	19133		2
135075	907	2302 N 13TH STREET	19133		2
135076	907	2304 N 13TH STREET	19133		2
135077	907	2306 N 13TH STREET	19133		2
135078	907	2308 N 13TH ST	19133		2
135079	907	2310 N 13TH ST	19133		2
135080	907	2312 N 13TH ST	19133		2
135081	907	2314 N 13TH ST	19133		2
135082	907	2316 N 13TH ST	19133		2
135083	907	2318 N 13TH ST	19133		2
135084	907	2320 N 13TH ST	19133		2
135085	907	2322 N 13TH ST	19133		2
135086	907	2324 N 13TH ST	19133		2
135087	907	2326 N 13TH ST	19133		2
135088	907	2327 N 13TH ST	19133		2
135089	907	2328 N 13TH ST	19133		2
135090	907	2330 N 13TH ST	19133		2
135091	907	2332 N 13TH ST	19133		2
135092	907	2334 N 13TH ST	19133		2
135093	907	2336 N 13TH ST	19133		2
135094	907	2337 N 13TH ST	19133		2
135095	907	2338 N 13TH ST	19133		2
135096	907	2340 N 13TH ST	19133		2
135097	907	2342 N 13TH ST	19133		2
135098	907	2344 N 13TH ST	19133		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
135099	907	2301 N 13TH ST	19133		2
135100	907	2303 N 13TH ST	19133		2
135101	907	2305 N 13TH ST	19133		2
135102	907	2307 N 13TH ST	19133		2
135103	907	2309 N 13TH ST	19133		4
135104	907	2311 N 13TH ST	19133		4
135105	907	2313 N 13TH ST	19133		2
135106	907	2315 N 13TH ST	19133		2
135107	907	2317 N 13TH ST	19133		2
135108	907	2319 N 13TH ST	19133		2
135109	907	2321 N 13TH ST	19133		2
135110	907	2323 N 13TH ST	19133		2
135111	907	2325 N 13TH ST	19133		2
135112	907	2329 N 13TH ST	19133		2
135113	907	2331 N 13TH ST	19133		2
135114	907	2333 N 13TH ST	19133		2
135115	907	2335 N 13TH ST	19133		2
135116	907	2339 N 13TH ST	19133		2
135117	907	2341 N 13TH STREET	19133		3
154001	907	1502 N. 8TH STREET	19122	A	1
154002	907	1502 N.8TH STREET	19122	B	1
154003	907	1504 N. 8TH STREET	19122	A	1
154004	907	1504 N. 8TH STREET	19122	B	1
154005	907	1512 N 8TH ST	19122	A	1
154006	907	1512 N. 8TH STREET	19122	B	1
154007	907	1514 N. 8TH STREET	19122	A	1
154008	907	1514 N. 8TH STREET	19122	B	1
154009	907	1530 N. 8TH STREET	19122		2
154010	907	1536 N. 8TH STREET	19122		2
154011	907	1419 N. 8TH STREET	19122		2
154012	907	1421 N. 8TH STREET	19122		2
154013	907	1334 N. FRANKLIN STREET	19122		3
154014	907	1336 N. FRANKLIN STREET	19122		3
169001	907	2138 N 7TH STREET	19122	A	0
169002	907	2138 N 7TH STREET	19122	B	0
169003	907	2138 N 7TH STREET	19122	C	0
169004	907	2138 N 7TH STREET	19122	D	0
169005	907	2143 N 7TH STREET	19122	A	0
169006	907	2143 N 7TH STREET	19122	B	0

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
169007	907	2143 N 7TH STREET	19122	C	0
169008	907	2143 N 7TH STREET	19122	D	0
169009	907	2501 N 11TH STREET	19133	A	0
169010	907	2501 N 11TH STREET	19133	B	0
169011	907	2501 N 11TH STREET	19133	C	0
169012	907	2501 N 11TH STREET	19133	D	0
169013	907	1922 N 8TH STREET	19122	A	0
169014	907	1922 N 8TH STREET	19122	B	0
169015	907	1922 N 8TH STREET	19122	C	0
169016	907	1922 N 8TH STREET	19122	D	0
169017	907	2254 CAMAC STREET	19133	A	0
169018	907	2254 CAMAC STREET	19133	B	0
169019	907	2254 CAMAC STREET	19133	C	0
169020	907	2254 CAMAC STREET	19133	D	0
255958	907	1921 N MARSHALL ST	19122		5
690115	907	2106 N 08TH STREET	19122		6
690126	907	2023 N 09TH STREET	19122		4
690192	907	2154 N FRANKLIN ST	19122		5
690193	907	2164 N 07TH STREET	19122		4
690215	907	2511 N 11TH STREET	19133	A	2
690216	907	2511 N 11TH STREET	19133	B	3
690234	907	1735 N MARSHALL ST	19122		4
690259	907	2125 N 09TH STREET	19122		5
690303	907	2027 N 09TH STREET	19122		4
690310	907	2145 N 09TH STREET	19122		5
690311	907	2055 N 09TH STREET	19122		4
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
690356	907	2453 N 10TH STREET	19133	A	2
690357	907	2453 N 10TH STREET	19133	B	3
690543	907	2017 N 08TH STREET	19122		5
690583	907	2170 N 07TH STREET	19122		4
690610	907	2168 N 07TH STREET	19122		4
690618	907	2250 N DELHI ST	19133		3
690840	907	2621 N WARNOCK ST	19133		3
690898	907	2009 N 08TH STREET	19122		5
690964	907	2124 N 07TH STREET	19122		4
690983	907	2015 N 08TH STREET	19122		5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690984	907	2532 N JESSUP ST	19133		3
690985	907	1223 W HUNTINGDON ST	19133		4
691032	907	2152 N 07TH STREET	19122		4
691065	907	2003 N 08TH STREET	19122		5
691081	907	1224 W SERGEANT ST	19133		3
691111	907	2206 N 07TH STREET	19133		5
691264	907	2007 N 09TH STREET	19122		4
691265	907	2009 N 09TH STREET	19122		4
691267	907	2013 N 09TH STREET	19122		4
691268	907	2015 N 09TH STREET	19122		4
691291	907	2019 N 09TH STREET	19122		4
691292	907	2529 N 12TH STREET	19133		6
691293	907	2025 N 09TH STREET	19122		4
691317	907	2021 N 09TH STREET	19122		4
691361	907	2115 N 08TH STREET	19122		5
691362	907	2127 N 08TH STREET	19122		6
691382	907	2135 N 08TH STREET	19122	A	1
691385	907	2132 N 08TH STREET	19122		5
691392	907	2154 N 07TH STREET	19122		5
691446	907	2508 N 11TH STREET	19133		5
691502	907	2135 N 08TH STREET	19122	B	2
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
804055	907	2142 N 08TH STREET	19122		5
804082	907	614 DIAMOND ST	19122		5
804114	907	1908 N 08TH STREET	19122		5
804115	907	2217 N 08TH STREET	19133		5
804133	907	1756 N 06TH STREET	19122		4
804173	907	1631 N MARSHALL ST	19122	A	3
804174	907	1631 N MARSHALL ST	19122	B	2
804196	907	2173 N FRANKLIN ST	19122	A	3
804197	907	2173 N FRANKLIN ST	19122	B	3
804309	907	1502 N 07TH STREET	19122	A	3
804310	907	1502 N 07TH STREET	19122	B	3
804322	907	1635 N MARSHALL ST	19122	A	2
804323	907	1635 N MARSHALL ST	19122	B	2
804324	907	1511 N FRANKLIN ST	19122	A	3
804325	907	1511 N FRANKLIN ST	19122	B	3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
804326	907	1511 N FRANKLIN ST	19122	C	3
804335	907	2213 N 08TH STREET	19133		6
804360	907	1427 N 08TH STREET	19122	A	2
804361	907	1427 N 08TH STREET	19122	B	3
804409	907	1445 N FRANKLIN ST	19122		5
804413	907	1738 N MARSHALL ST	19122	A	3
804414	907	1738 N MARSHALL ST	19122	B	4
804428	907	1805 N 08TH STREET	19122		6
804501	907	2601 N JESSUP ST	19133	A	2
804502	907	2601 N JESSUP ST	19133	B	3
804519	907	1448 N MARSHALL ST	19122	A	2
804520	907	1448 N MARSHALL ST	19122	B	4
804574	907	1420 N MARSHALL ST	19122	A	3
804575	907	1420 N MARSHALL ST	19122	B	3
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
804724	907	2248 N CAMAC ST	19133		3
804732	907	905 W ARIZONA ST	19133		5
804734	907	2606 N JESSUP ST	19133		5
804737	907	2139 N FRANKLIN ST	19122		5
804738	907	2531 N 11TH STREET	19133		5
804739	907	2218 N CAMAC ST	19133		6
818003	907	2321 N FAWN ST	19133		3
818017	907	2125 N 08TH STREET	19122		5
818024	907	816 W OXFORD ST	19122		4
818025	907	731 W OXFORD ST	19122		5
818036	907	2110 N 08TH STREET	19122		6
818061	907	2534 N 12TH STREET	19133		4
818070	907	1824 N MARSHALL ST	19122		4
818091	907	1548 N 07TH STREET	19122		6
818092	907	1648 N 06TH STREET	19122		4
818112	907	633 W NORRIS ST	19122		2

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
818134	907	1219 W FIRTH ST	19133		3
818164	907	631 DIAMOND ST	19122		6
818172	907	735 W OXFORD ST	19122		5
818173	907	1739 N MARSHALL ST	19122		4
818201	907	1637 N MARSHALL ST	19122		5
818260	907	2161 N 08TH STREET	19122		5
818285	907	1217 W DAUPHIN ST	19133		4
818312	907	2545 N SARTAIN ST	19133		3
818318	907	2214 N 09TH STREET	19133		5
818328	907	2528 N SARTAIN ST	19133		3
818329	907	2318 N CAMAC ST	19133		3
818373	907	2317 N FAWN ST	19133		3
818397	907	2239 N CAMAC ST	19133		6
818406	907	2326 N 12TH STREET	19133		3
818409	907	1242 W SERGEANT ST	19133		3
818493	907	624 DIAMOND ST	19122		5
818509	907	2451 N PARK AVE	19132		5
857254	907	2232 N DELHI ST	19133		3
857263	907	1220 W HUNTINGDON ST	19133		3
857272	907	2332 N CAMAC ST	19133		3
857277	907	1237 W FIRTH ST	19133		3
857278	907	1135 W CUMBERLAND ST	19133		3
888603	907	2253 N CAMAC ST	19133		4
888619	907	2541 N SARTAIN ST	19133		3
888629	907	2615 N 11TH STREET	19133		5
926766	907	622 W NORRIS ST	19122		5
926779	907	2623 N WARNOCK ST	19133		3
41524	908	3043 W SUSQUEHANNA AVE	19121		5
41556	908	2335 N 21ST STREET	19132		6
41562	908	2619 N 31ST STREET	19132		3
41569	908	2627 N NAPA ST	19132		3
41579	908	3128 W ARIZONA ST	19132		2
41601	908	2327 N 21ST STREET	19132		6
41608	908	2420 N 28TH STREET	19132		3
41609	908	2422 N 28TH STREET	19132		3
41621	908	1642 W YORK ST	19132		3
41637	908	3023 W SUSQUEHANNA AVE	19121		5
41649	908	2250 N 21ST STREET	19132	A	2
41650	908	2250 N 21ST STREET	19132	B	5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
41706	908	2344 N OPAL ST	19132		3
41804	908	2233 N 17TH STREET	19132		4
41831	908	2201 W SERGEANT ST	19132		2
41920	908	1426 W YORK ST	19132		6
41927	908	2503 N 17TH STREET	19132	A	2
41928	908	2503 N 17TH STREET	19132	B	4
41943	908	2638 N HOLLYWOOD ST	19132		3
41971	908	2233 N 19TH STREET	19132		5
41978	908	2349 N 21ST STREET	19132		5
41983	908	2463 N DOUGLAS ST	19132		3
41996	908	2648 N HOLLYWOOD ST	19132		3
42000	908	3040 W GORDON ST	19132		2
42012	908	2347 N 32ND STREET	19132		3
42093	908	3022 W DAUPHIN ST	19132	A	2
42094	908	3022 W DAUPHIN ST	19132	B	4
42120	908	2246 N 17TH STREET	19132	A	2
42121	908	2246 N 17TH STREET	19132	B	4
42127	908	2406 N MARSTON ST	19132		2
42154	908	2811 W HUNTINGDON ST	19132		3
42157	908	2453 N NAPA ST	19132		2
42164	908	2646 N 31ST STREET	19132		3
42354	908	2438 N 30TH STREET	19132		5
42465	908	2224 N 16TH STREET	19132	A	1
42466	908	2224 N 16TH STREET	19132	B	3
42480	908	2251 N MOLE ST	19132		2
42503	908	2240 N 20TH STREET	19132	A	2
42504	908	2240 N 20TH STREET	19132	B	5
42521	908	2321 N CROSKEY ST	19132		2
42578	908	2309 N CROSKEY ST	19132		3
42633	908	2239 N 22ND STREET	19132	A	1
42634	908	2239 N 22ND STREET	19132	B	4
42635	908	2253 N 22ND STREET	19132	A	1
42636	908	2253 N 22ND ST	19132	B	4
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
42680	908	2328 N 26TH STREET	19132		4
42681	908	2946 W YORK ST	19132		2

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
42711	908	2408 N BOUVIER ST	19132		3
42721	908	2244 N 17TH STREET	19132	A	1
42722	908	2244 N 17TH STREET	19132	B	4
42749	908	2449 N DOUGLAS ST	19132		3
42774	908	1913 W DAUPHIN ST	19132	A	1
42775	908	1913 W DAUPHIN ST	19132	B	5
42796	908	2939 W GORDON ST	19132		3
42804	908	2616 N STANLEY ST	19132		3
42805	908	2339 N 26TH STREET	19132		3
42833	908	2911 W OAKDALE ST	19132		2
42885	908	2404 N BOUVIER ST	19132		3
42886	908	2931 W ARIZONA ST	19132		2
42907	908	2218 N 16TH STREET	19132	A	3
42908	908	2218 N 16TH STREET	19132	B	2
42946	908	2339 N 21ST STREET	19132	A	2
42947	908	2339 N 21ST STREET	19132	B	4
42956	908	2220 N 17TH STREET	19132	A	2
42957	908	2220 N 17TH STREET	19132	B	5
42960	908	2943 W ARIZONA ST	19132		2
42994	908	2266 N VAN PELT ST	19132		3
43008	908	2301 N BOUVIER ST	19132	A	1
43009	908	2301 N BOUVIER ST	19132	B	5
43012	908	2541 W DAUPHIN ST	19132		2
43018	908	2537 W DAUPHIN ST	19132		2
43066	908	2329 N 16TH STREET	19132	A	1
43067	908	2329 N 16TH STREET	19132	B	5
43068	908	2262 N 17TH STREET	19132		6
43090	908	2426 N 28TH STREET	19132		3
43222	908	2423 N DOUGLAS ST	19132		3
43282	908	2273 N BOUVIER ST	19132	A	2
43283	908	2273 N BOUVIER ST	19132	B	3
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
43563	908	2630 N STANLEY ST	19132		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43569	908	2555 W OAKDALE ST	19132		3
43581	908	2458 N CORLIES ST	19132		2
43598	908	2203 N 19TH STREET	19132	A	3
43599	908	2203 N 19TH STREET	19132	B	4
43659	908	2636 N STANLEY ST	19132		3
43676	908	2262 N 21ST STREET	19132	A	3
43677	908	2262 N 21ST STREET	19132	B	4
43719	908	2350 N VAN PELT ST	19132		3
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
43796	908	2523 W OAKDALE ST	19132		3
43801	908	2638 N 29TH STREET	19132	A	2
43802	908	2638 N 29TH STREET	19132	B	4
43833	908	2311 N 20TH STREET	19132	A	3
43834	908	2311 N 20TH STREET	19132	B	3
43897	908	2563 N 28TH STREET	19132	A	3
43898	908	2563 N 28TH STREET	19132	B	3
43899	908	2563 N 28TH STREET	19132	C	3
43948	908	2231 N 22ND STREET	19132	A	3
43949	908	2231 N 22ND STREET	19132	B	4
124870	908	1639 W DAUPHIN ST	19132		6
124873	908	2566 N GRATZ ST	19132		3
124909	908	2210 N 19TH STREET	19132		5
124925	908	2615 N NAPA ST	19132		3
124935	908	2416 N GRATZ ST	19132		3
124962	908	2332 N 19TH STREET	19132		6
124974	908	2236 N 19TH STREET	19132		5
124975	908	2643 N HOLLYWOOD ST	19132		3
124995	908	2550 N COLORADO ST	19132		3
125002	908	2230 N 19TH STREET	19132		6
125016	908	1616 W CUMBERLAND ST	19132		5
125047	908	2359 N BOUVIER ST	19132		3
125050	908	2323 N WOODSTOCK ST	19132		3
125056	908	2343 N 20TH STREET	19132		6
125065	908	2245 N BOUVIER ST	19132		3
125079	908	2500 N OPAL ST	19132		3
125085	908	2830 W HUNTINGDON ST	19132		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125086	908	2629 N NAPA ST	19132		3
125087	908	2431 N DOUGLAS ST	19132		3
125102	908	2345 N 22ND STREET	19132		6
125111	908	2411 N 31ST STREET	19132		4
125115	908	2436 N NAPA ST	19132		3
125117	908	2665 N NAPA ST	19132		3
125131	908	2367 N COLORADO ST	19132		3
125133	908	2510 N 28TH STREET	19132		3
125190	908	2549 N GARNET ST	19132		4
125206	908	2353 N 20TH STREET	19132		5
125208	908	2433 N 30TH STREET	19132		4
125216	908	2632 N CHADWICK ST	19132		3
125219	908	2501 N MYRTLEWOOD ST	19132		2
125244	908	2421 N NATRONA ST	19132		2
125245	908	1523 W FIRTH ST	19132		3
125246	908	2453 N NEWKIRK ST	19132		2
125249	908	1641 W DAUPHIN ST	19132	A	1
125261	908	2245 N UBER ST	19132		6
125278	908	2459 N 28TH STREET	19132		3
125287	908	2313 N 31ST STREET	19132		3
125288	908	2432 N NATRONA ST	19132		2
125302	908	2553 N 33RD STREET	19132		4
125304	908	2623 N DOUGLAS ST	19132		2
125315	908	2512 N PATTON ST	19132		2
125323	908	2229 N 22ND STREET	19132		6
125325	908	1601 W YORK ST	19132		4
125326	908	2239 N 17TH STREET	19132		6
125354	908	2515 N 33RD STREET	19132		4
125356	908	2336 N VAN PELT ST	19132		3
125360	908	2628 N 31ST STREET	19132		4
125364	908	2923 W OAKDALE ST	19132		2
125367	908	2454 N NEWKIRK ST	19132		2
125395	908	2649 N HOLLYWOOD ST	19132		3
125400	908	2436 N NEWKIRK ST	19132		2
125404	908	2438 N MYRTLEWOOD ST	19132		3
125405	908	2335 N VAN PELT ST	19132		3
125421	908	2219 N 22ND STREET	19132		6
125436	908	2548 N 17TH STREET	19132		4
125438	908	2328 N 16TH STREET	19132		6

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125442	908	2355 N OPAL ST	19132		2
125447	908	2515 N DOVER ST	19132		2
125454	908	2431 N DOVER ST	19132		2
125459	908	3139 W ARIZONA ST	19132		2
125460	908	2649 N 31ST STREET	19132		3
125464	908	2419 W HAROLD ST	19132		3
125465	908	2531 N NEWKIRK ST	19132		2
125466	908	3137 W ARIZONA ST	19132		2
125472	908	2454 N DOVER ST	19132		2
125473	908	2414 N DOUGLAS ST	19132		3
125481	908	2507 N MYRTLEWOOD ST	19132		3
125501	908	2569 N CORLIES ST	19132		3
125505	908	1516 W FIRTH ST	19132		3
125519	908	2319 N 17TH STREET	19132		5
125531	908	2224 N 19TH STREET	19132		6
125538	908	2527 N CORLIES ST	19132		3
125540	908	2420 N NATRONA ST	19132		2
125546	908	2244 N 19TH STREET	19132		5
125577	908	3147 W ARIZONA ST	19132		2
125592	908	2247 N 17TH STREET	19132		6
125596	908	2240 N 19TH STREET	19132		5
125597	908	2227 N 16TH STREET	19132		6
125601	908	2929 W ARIZONA ST	19132		2
125602	908	2308 N GRATZ ST	19132		3
125612	908	2521 W ARIZONA ST	19132		2
125623	908	2402 N CLEVELAND ST	19132		3
125631	908	2524 W ARIZONA ST	19132		2
125645	908	3026 W GORDON ST	19132		2
125653	908	2449 N DOVER ST	19132		2
125666	908	2312 W SERGEANT ST	19132		2
125676	908	2609 W OAKDALE ST	19132		2
125702	908	2212 W LEHIGH AVE	19132		6
125724	908	2308 N 25TH STREET	19132		3
125730	908	2433 N STANLEY ST	19132		2
125749	908	2842 W HAROLD ST	19132		3
125766	908	2326 W SERGEANT ST	19132		2
125775	908	2326 N 21ST STREET	19132		6
125791	908	2435 N 29TH STREET	19132		5
125797	908	1708 W HUNTINGDON ST	19132		4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125800	908	2512 N NATRONA ST	19132		3
125836	908	2216 N 19TH STREET	19132		6
125838	908	2209 N 16TH STREET	19132		6
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
125908	908	2365 N CLEVELAND ST	19132		3
125911	908	3003 W DAKOTA ST	19132		3
125913	908	2457 N 28TH STREET	19132		3
125922	908	2936 W ARIZONA ST	19132		3
125946	908	1641 W DAUPHIN ST	19132	B	3
170001	908	2642 N 26TH STREET	19132	A	0
170002	908	2642 N 26TH STREET	19132	B	0
170003	908	2642 N 26TH STREET	19132	C	0
170004	908	2642 N 26TH STREET	19132	D	0
255953	908	2446 N DOVER ST	19132		2
255959	908	2408 N BANCROFT ST	19132		2
255968	908	2411 N CORLIES ST	19132		2
255969	908	2459 N CARLISLE ST	19132		3
255971	908	2258 N 17TH STREET	19132		6
255988	908	3033 W OAKDALE ST	19132		2
690006	908	1520 W SERGEANT ST	19132		3
690007	908	2524 N 16TH STREET	19132		4
690008	908	2504 N 16TH STREET	19132	A	1
690033	908	2447 N BANCROFT ST	19132		3
690041	908	2625 N 18TH STREET	19132		4
690055	908	2227 N 19TH STREET	19132		5
690078	908	2608 N 18TH STREET	19132		3
690080	908	2649 N BANCROFT ST	19132		3
690082	908	2433 N CHADWICK ST	19132		3
690120	908	2345 N CLEVELAND ST	19132		3
690121	908	2330 N 21ST STREET	19132		6
690122	908	2328 N 21ST STREET	19132		6
690128	908	2319 N BOUVIER ST	19132		3
690130	908	2456 N 28TH STREET	19132		3
690134	908	2340 N 16TH STREET	19132		6
690165	908	2242 N 17TH STREET	19132		6
690177	908	2224 N 17TH STREET	19132		6

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690201	908	2565 N MYRTLEWOOD ST	19132		4
690219	908	2252 N 19TH STREET	19132		5
690405	908	2553 N 16TH STREET	19132		6
690409	908	1544 W OAKDALE ST	19132		3
690418	908	2412 N 28TH STREET	19132		3
690430	908	2443 N 29TH STREET	19132		5
690522	908	2412 N PATTON ST	19132		3
690537	908	2843 W HAROLD ST	19132		3
690539	908	2648 N CHADWICK ST	19132		3
690568	908	2441 N 33RD STREET	19132		4
690594	908	2504 N 33RD STREET	19132		5
690604	908	2536 N NATRONA ST	19132		3
690607	908	2642 N COLORADO ST	19132		3
690629	908	2640 N COLORADO ST	19132		3
690647	908	2555 N BANCROFT ST	19132		3
690650	908	2036 W HAGERT ST	19132		3
690660	908	2210 N WOODSTOCK ST	19132		3
690670	908	2419 W FIRTH ST	19132		3
690672	908	2524 N NATRONA ST	19132		3
690678	908	2425 N BANCROFT ST	19132		3
690687	908	2210 N BOUVIER ST	19132		3
690701	908	2620 N CHADWICK ST	19132		3
690707	908	2508 N 18TH STREET	19132		3
690723	908	2430 N 28TH STREET	19132		3
690725	908	2552 N COLORADO ST	19132		3
690726	908	2313 N GRATZ ST	19132		3
690749	908	2250 N BOUVIER ST	19132		3
690757	908	2354 N BOUVIER ST	19132		3
690772	908	2224 W OAKDALE ST	19132		3
690793	908	2623 N BOUVIER ST	19132		3
690817	908	2644 N NAPA ST	19132		3
690841	908	2524 N SPANGLER ST	19132		3
690891	908	2437 N DOUGLAS ST	19132		2
690903	908	2529 N 18TH STREET	19132		4
690920	908	2556 N 28TH STREET	19132		3
690924	908	2341 N BOUVIER ST	19132		3
690955	908	2410 N GRATZ ST	19132		3
690957	908	2046 W GLENWOOD AVE	19132		4
690969	908	2452 N CHADWICK ST	19132		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690972	908	3211 W DAUPHIN ST	19132		4
690973	908	2356 N OPAL ST	19132		3
690975	908	2550 N NATRONA ST	19132		3
690980	908	2320 N COLORADO ST	19132		3
690988	908	2436 N MARSTON ST	19132		2
690989	908	2442 N MARSTON ST	19132		2
690991	908	2446 N MARSTON ST	19132		2
690992	908	2456 N MARSTON ST	19132		2
690993	908	2460 N MARSTON ST	19132		2
690994	908	2426 N 32ND STREET	19132		4
690998	908	2821 W ALBERT ST	19132		3
691013	908	2543 N BANCROFT ST	19132		3
691019	908	2506 N DOUGLAS ST	19132		3
691020	908	2519 N MARSTON ST	19132		3
691033	908	2528 N 17TH STREET	19132		3
691072	908	2425 N MARSTON ST	19132		2
691077	908	2424 N 28TH STREET	19132		3
691079	908	2452 N MARSTON ST	19132		2
691080	908	2454 N MARSTON ST	19132		2
691088	908	2632 N BOUVIER ST	19132		3
691089	908	2460 N GARNET ST	19132		3
691103	908	2437 N 32ND STREET	19132		4
691115	908	2439 N CARLISLE ST	19132		3
691140	908	2226 N NATRONA ST	19132	A	1
691141	908	2226 N NATRONA ST	19132	B	3
691149	908	2603 N 29TH STREET	19132	A	2
691150	908	2603 N 29TH STREET	19132	B	3
691169	908	2429 N MYRTLEWOOD ST	19132		3
691193	908	2525 N NATRONA ST	19132		3
691210	908	2536 N 18TH STREET	19132		4
691220	908	2448 N MARSTON ST	19132		2
691221	908	2458 N MARSTON ST	19132		2
691283	908	2536 N GARNET ST	19132		3
691294	908	2604 N CORLIES ST	19132		3
691296	908	2511 N NAPA ST	19132		3
691300	908	2335 N 32ND STREET	19132		3
691314	908	2438 N MARSTON ST	19132		2
691315	908	2523 N HOLLYWOOD ST	19132		2
691396	908	2443 W SERGEANT ST	19132		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
691404	908	2461 N DOUGLAS ST	19132		3
691426	908	2204 N NATRONA ST	19132		5
691437	908	2809 W HUNTINGDON ST	19132		3
691439	908	2415 N MARSTON ST	19132		2
691442	908	2402 N BOUVIER ST	19132		3
691453	908	2528 N STANLEY ST	19132		2
691499	908	2457 N CORLIES ST	19132		2
691504	908	2504 N 16TH STREET	19132	B	2
804031	908	2626 N 28TH STREET	19132		6
804067	908	2334 N 20TH STREET	19132	A	3
804068	908	2334 N 20TH STREET	19132	B	3
804222	908	2339 N 30TH STREET	19132		5
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
804410	908	2344 N 16TH STREET	19132	A	3
804411	908	2344 N 16TH STREET	19132	B	3
804417	908	2345 N 20TH STREET	19132		4
804458	908	2240 N 17TH STREET	19132	A	2
804459	908	2240 N 17TH STREET	19132	B	4
804463	908	2229 N 16TH STREET	19132	A	3
804464	908	2229 N 16TH STREET	19132	B	3
804474	908	2504 N 19TH STREET	19132	A	3
804475	908	2504 N 19TH STREET	19132	B	3
804534	908	2213 N 22ND STREET	19132	A	3
804535	908	2213 N 22ND STREET	19132	B	4
804567	908	2328 N 22ND STREET	19132	A	4
804568	908	2328 N 22ND STREET	19132	B	3
804569	908	2328 N 22ND STREET	19132	C	3
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
804727	908	2927 W ARIZONA ST	19132		2
804753	908	1922 W YORK ST	19132		5
818006	908	3213 W DAUPHIN ST	19132		4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
818021	908	2413 N NAPA ST	19132		2
818066	908	2218 N 15TH STREET	19132		5
818077	908	1514 W FIRTH ST	19132		3
818094	908	1522 W FIRTH ST	19132		3
818135	908	2314 N 30TH STREET	19132		6
818153	908	2414 N BANCROFT ST	19132		3
818159	908	2439 N 28TH STREET	19132		3
818189	908	2731 W ALBERT ST	19132		3
818198	908	2433 N 29TH STREET	19132		5
818200	908	2040 W HAGERT ST	19132		3
818228	908	2214 W LEHIGH AVE	19132		6
818233	908	2639 N HOLLYWOOD ST	19132		3
818242	908	2420 N 31ST STREET	19132		4
818246	908	2428 N 28TH STREET	19132		3
818253	908	2325 N 31ST STREET	19132		4
818254	908	2531 N 29TH STREET	19132		5
818256	908	2722 W HUNTINGDON ST	19132		3
818266	908	2240 N BANCROFT ST	19132		3
818277	908	2404 N 28TH STREET	19132		3
818281	908	2500 N MARSTON ST	19132		4
818284	908	2528 N 15TH STREET	19132		6
818286	908	2622 N 31ST STREET	19132		3
818291	908	2227 N CARLISLE ST	19132		3
818296	908	3016 W LEHIGH AVE	19132		6
818300	908	1513 W CUMBERLAND ST	19132		5
818305	908	2569 N HOLLYWOOD ST	19132		4
818310	908	2568 N HOLLYWOOD ST	19132		4
818354	908	2733 W ALBERT ST	19132		3
818375	908	2225 N LAMBERT ST	19132		3
818376	908	2431 N 25TH STREET	19132		5
818383	908	2651 N 28TH STREET	19132		3
818407	908	2440 N MYRTLEWOOD ST	19132		3
818415	908	2543 N CLEVELAND ST	19132		3
818421	908	2844 W HAROLD ST	19132		3
818428	908	2426 N BANCROFT ST	19132		3
818429	908	2616 N BOUVIER ST	19132		3
818459	908	2546 N 25TH STREET	19132		3
818467	908	2550 N 25TH STREET	19132		3
818482	908	2218 N 19TH STREET	19132		6

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
818484	908	2225 N 19TH STREET	19132		5
818485	908	2614 N BOUVIER ST	19132		3
818486	908	2254 N 19TH STREET	19132		6
818487	908	2115 W DAUPHIN ST	19132		3
818491	908	2232 N 19TH STREET	19132		6
818492	908	2448 N 15TH STREET	19132		6
818495	908	1918 W YORK ST	19132		6
818499	908	2417 N DOUGLAS ST	19132		3
818500	908	2346 N VAN PELT ST	19132		3
818539	908	2536 N BANCROFT ST	19132		3
857227	908	2610 N 31ST STREET	19132		3
857231	908	2467 N PATTON ST	19132		3
857248	908	2521 N BANCROFT ST	19132		3
857251	908	2417 N COLORADO ST	19132		3
857276	908	2442 N DOUGLAS ST	19132		3
857286	908	2311 N 25TH STREET	19132		3
888555	908	2306 N GRATZ ST	19132		3
888558	908	1626 W YORK ST	19132		6
888608	908	2314 N BEECHWOOD ST	19132		3
888616	908	2618 N HOLLYWOOD ST	19132		3
888627	908	2531 N OPAL ST	19132		3
888651	908	2544 N CLEVELAND ST	19132		3
888655	908	2404 N GRATZ ST	19132		3
888674	908	2658 N 17TH STREET	19132		6
888705	908	2619 N 17TH STREET	19132		5
888733	908	2326 N GRATZ ST	19132		3
888744	908	2356 N GRATZ ST	19132		3
888752	908	2524 N 30TH STREET	19132		3
888884	908	2529 N OPAL ST	19132		3
916122	908	2810 N VANPELT ST	19132		3
926739	908	2226 N BOUVIER ST	19132		3
926742	908	2320 N CLEVELAND ST	19132		3
926760	908	2456 N NAPA ST	19132		3
926761	908	2523 N NAPA ST	19132		2
926763	908	2502 N NATRONA ST	19132		3
926767	908	2403 W OAKDALE ST	19132		4
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
41529	909	1940 N TAYLOR ST	19121		2
41539	909	1812 N 22ND STREET	19121	A	3
41540	909	1812 N 22ND STREET	19121	B	4
41557	909	2940 PAGE ST	19121		3
41573	909	1936 N TAYLOR ST	19121		3
41581	909	2122 N 20TH STREET	19121		6
41594	909	2014 N 19TH STREET	19121		6
41598	909	2101 N WOODSTOCK ST	19121		5
41632	909	2026 N 18TH STREET	19121		5
41642	909	1903 N 32ND STREET	19121		5
41643	909	3130 W WILT ST	19121		3
41651	909	2947 FRENCH ST	19121		2
41652	909	1840 N JUDSON ST	19121		3
41715	909	2017 N BAMBREY ST	19121		3
41720	909	2014 N WOODSTOCK ST	19121		5
41721	909	1835 N VAN PELT ST	19121		6
41731	909	2110 N 20TH ST	19121		6
41755	909	2010 N WOODSTOCK ST	19121		5
41758	909	2156 N MARSTON ST	19121		3
41775	909	2919 FRENCH ST	19121		2
41793	909	2031 DIAMOND ST	19121	A	3
41794	909	2031 DIAMOND ST	19121	B	3
41795	909	2031 DIAMOND ST	19121	C	3
41806	909	2123 N 15TH STREET	19121	A	1
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
41863	909	1810 N 23RD STREET	19121	A	2
41864	909	1810 N 23RD STREET	19121	B	5
41867	909	2927 WESTMONT ST	19121		2
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
41919	909	2123 N MARSTON ST	19121		3
41921	909	1923 N 19TH STREET	19121	A	2
41922	909	1923 N 19TH STREET	19121	B	4
41923	909	3230 PAGE ST	19121		3
41986	909	2120 N 19TH STREET	19121		6

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
41997	909	2918 WESTMONT ST	19121		2
41998	909	2956 WESTMONT ST	19121		3
42030	909	2104 N 16TH STREET	19121	A	3
42031	909	2104 N 16TH STREET	19121	B	3
42032	909	2104 N 16TH STREET	19121	C	1
42037	909	3012 PAGE ST	19121		3
42049	909	1908 N 18TH STREET	19121	A	2
42050	909	1908 N 18TH STREET	19121	B	6
42066	909	1801 N 17TH STREET	19121	A	1
42067	909	1801 N 17TH STREET	19121	B	5
42151	909	2042 N LAMBERT ST	19121		5
42161	909	2021 N 22ND STREET	19121	A	2
42162	909	2021 N 22ND STREET	19121	B	5
42163	909	2021 N 22ND STREET	19121	C	5
42167	909	2027 N 17TH STREET	19121	A	3
42168	909	2027 N 17TH STREET	19121	B	3
42169	909	2027 N 17TH STREET	19121	C	3
42189	909	1808 N 23RD STREET	19121	A	2
42190	909	1808 N 23RD STREET	19121	B	4
42223	909	2019 N 22ND STREET	19121	A	4
42224	909	2019 N 22ND STREET	19121	C	4
42225	909	2019 N 22ND STREET	19121	B	5
42262	909	1611 DIAMOND ST	19121	A	3
42263	909	1611 DIAMOND ST	19121	B	3
42264	909	1611 DIAMOND ST	19121	C	3
42280	909	1833 N 22ND STREET	19121	A	2
42281	909	1833 N 22ND STREET	19121	B	6
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
42320	909	2036 N 15TH STREET	19121	A	2
42321	909	2036 N 15TH STREET	19121	B	3
42322	909	2036 N 15TH STREET	19121	C	3
42323	909	1524 DIAMOND ST	19121	A	3
42324	909	1524 DIAMOND ST	19121	B	3
42325	909	1524 DIAMOND ST	19121	C	3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
42341	909	2003 N ETTING ST	19121		3
42357	909	1526 DIAMOND ST	19121	A	3
42358	909	1526 DIAMOND ST	19121	B	3
42359	909	1526 DIAMOND ST	19121	C	3
42360	909	1528 DIAMOND ST	19121	A	3
42361	909	1528 DIAMOND ST	19121	B	3
42362	909	1528 DIAMOND ST	19121	C	3
42373	909	2030 DIAMOND ST	19121	A	2
42374	909	2030 DIAMOND ST	19121	B	3
42375	909	2030 DIAMOND ST	19121	C	3
42432	909	1530 DIAMOND ST	19121	A	3
42433	909	1530 DIAMOND ST	19121	B	4
42434	909	1530 DIAMOND ST	19121	C	2
42441	909	2043 DIAMOND ST	19121	A	3
42442	909	2043 DIAMOND ST	19121	B	4
42443	909	2043 DIAMOND ST	19121	C	2
42467	909	1534 DIAMOND ST	19121	A	3
42468	909	1534 DIAMOND ST	19121	B	3
42469	909	1534 DIAMOND ST	19121	C	3
42475	909	3136 W BERKS ST	19121	A	6
42477	909	2029 N 17TH STREET	19121	A	4
42478	909	2029 N 17TH STREET	19121	B	4
42485	909	1835 N 22ND STREET	19121	A	5
42486	909	1835 N 22ND STREET	19121	B	4
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
42522	909	3144 W BERKS ST	19121	A	3
42536	909	1832 N 17TH STREET	19121	A	2
42537	909	1832 N 17TH STREET	19121	B	3
42538	909	1832 N 17TH STREET	19121	C	3
42539	909	1951 N 18TH STREET	19121		5
42573	909	1718 DIAMOND ST	19121	A	2
42574	909	1718 DIAMOND ST	19121	B	3
42575	909	1718 DIAMOND ST	19121	C	3
42599	909	1904 W NORRIS ST	19121	A	1
42600	909	1904 W NORRIS ST	19121	B	3
42602	909	1844 N 22ND STREET	19121	A	3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
42603	909	1844 N 22ND STREET	19121	B	3
42604	909	1844 N 22ND STREET	19121	C	2
42631	909	1808 N 22ND STREET	19121	A	2
42632	909	1808 N 22ND STREET	19121	B	6
42639	909	1847 N 22ND STREET	19121	A	2
42640	909	1847 N 22ND STREET	19121	B	6
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
42661	909	2015 N 22ND STREET	19121	A	4
42662	909	2015 N 22ND STREET	19121	B	4
42663	909	2015 N 22ND STREET	19121	C	4
42664	909	3122 PAGE ST	19121		3
42670	909	1520 DIAMOND ST	19121	A	3
42671	909	1520 DIAMOND ST	19121	B	3
42672	909	1520 DIAMOND ST	19121	C	3
42675	909	1911 N 18TH STREET	19121	A	2
42676	909	1911 N 18TH STREET	19121	B	6
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
42742	909	2127 N GRATZ ST	19121	A	2
42743	909	2127 N GRATZ ST	19121	B	4
42744	909	2127 N GRATZ ST	19121	C	1
42761	909	1846 N 22ND STREET	19121	A	4
42762	909	1846 N 22ND STREET	19121	B	4
42763	909	3032 W SUSQUEHANNA AVE	19121		5
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

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
42795	909	1917 N 24TH STREET	19121		5
42806	909	2132 N 30TH STREET	19121	A	1
42807	909	2132 N 30TH STREET	19121	B	4
42813	909	2135 N 15TH STREET	19121	A	2
42814	909	2135 N 15TH STREET	19121	B	3
42815	909	2135 N 15TH STREET	19121	C	3
42839	909	2006 N 32ND STREET	19121	A	2
42840	909	2006 N 32ND STREET	19121	B	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
42870	909	1901 W BERKS ST	19121		6
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
42900	909	1928 N 19TH STREET	19121	A	3
42901	909	1928 N 19TH STREET	19121	B	4
42902	909	2008 N 19TH STREET	19121	A	3
42903	909	2008 N 19TH STREET	19121	B	3
42904	909	3015 W SEDGLEY ST	19121		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
43003	909	1909 N 18TH STREET	19121	A	2
43004	909	1909 N 18TH STREET	19121	B	6
43013	909	2130 N 32ND STREET	19121		4
43040	909	1920 N 22ND STREET	19121	A	1
43069	909	1936 N GRATZ ST	19121	A	1
43070	909	1936 N GRATZ ST	19121	B	4
43103	909	2004 N 22ND STREET	19121	A	3
43104	909	2004 N 22ND STREET	19121	B	3
43105	909	2004 N 22ND STREET	19121	C	3
43109	909	2118 N 20TH STREET	19121	A	1
43110	909	2118 N 20TH STREET	19121	B	3
43146	909	1913 N 18TH STREET	19121	A	2
43147	909	1913 N 18TH STREET	19121	B	6

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43151	909	2142 N NATRONA ST	19121		4
43204	909	1944 N 22ND STREET	19121	A	3
43205	909	1944 N 22ND STREET	19121	B	4
43278	909	2009 N VAN PELT ST	19121		3
43279	909	1927 N NEWKIRK ST	19121		3
43296	909	2110 N 17TH STREET	19121	A	3
43297	909	2110 N 17TH STREET	19121	B	5
43322	909	1903 N 18TH STREET	19121	A	3
43323	909	1903 N 18TH STREET	19121	B	6
43324	909	2215 W MONTGOMERY AVE	19121		5
43339	909	2131 N 15TH STREET	19121	A	2
43340	909	2131 N 15TH STREET	19121	B	3
43341	909	2131 N 15TH STREET	19121	C	3
43342	909	2133 N 15TH STREET	19121	A	1
43343	909	2133 N 15TH STREET	19121	B	3
43344	909	2133 N 15TH STREET	19121	C	3
43384	909	1737 W BERKS ST	19121	A	3
43385	909	1737 W BERKS ST	19121	B	4
43387	909	2110 N 16TH STREET	19121	A	4
43388	909	2110 N 16TH STREET	19121	B	4
43393	909	2129 N 15TH STREET	19121	A	2
43394	909	2129 N 15TH STREET	19121	B	3
43395	909	2129 N 15TH STREET	19121	C	3
43402	909	2112 N 16TH STREET	19121	A	4
43403	909	2112 N 16TH STREET	19121	B	5
43407	909	1814 N 23RD STREET	19121	A	3
43408	909	1814 N 23RD STREET	19121	B	2
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
43465	909	2034 N 20TH STREET	19121	A	3
43466	909	2034 N 20TH STREET	19121	B	4
43501	909	1810 N 22ND STREET	19121		6
43516	909	1833 N 21ST STREET	19121		5
43554	909	1847 N 17TH STREET	19121	A	3
43555	909	1847 N 17TH STREET	19121	B	1
43556	909	1847 N 17TH STREET	19121	C	4
43560	909	2127 N 18TH STREET	19121	A	4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43561	909	2127 N 18TH STREET	19121	B	4
43576	909	2127 N 20TH STREET	19121	A	3
43577	909	2127 N 20TH STREET	19121	B	3
43593	909	1727 DIAMOND ST	19121	A	2
43594	909	1727 DIAMOND ST	19121	B	6
43600	909	1928 W SUSQUEHANNA AVE	19121		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
43642	909	2001 N 17TH STREET	19121	A	3
43643	909	2001 N 17TH STREET	19121	B	3
43644	909	2001 N 17TH STREET	19121	C	3
43645	909	2112 N 17TH STREET	19121	A	3
43646	909	2112 N 17TH STREET	19121	B	3
43647	909	2112 N 17TH STREET	19121	C	3
43650	909	1720 DIAMOND ST	19121	A	3
43651	909	1720 DIAMOND ST	19121	B	2
43652	909	1720 DIAMOND ST	19121	C	2
43679	909	3101 EUCLID ST	19121	A	4
43680	909	3101 EUCLID ST	19121	B	4
43760	909	1836 N 18TH STREET	19121	A	2
43761	909	1836 N 18TH STREET	19121	B	3
43762	909	1836 N 18TH STREET	19121	C	3
43779	909	2029 N 21ST STREET	19121	A	3
43780	909	2029 N 21ST STREET	19121	B	3
43819	909	1851 N 19TH STREET	19121	A	3
43820	909	1851 N 19TH STREET	19121	B	3
43843	909	1942 N 22ND STREET	19121	A	3
43844	909	1942 N 22ND STREET	19121	B	4
43873	909	2002 N 17TH STREET	19121	A	3
43874	909	2002 N 17TH STREET	19121	B	4
43875	909	1901 N 18TH STREET	19121	A	3
43876	909	1901 N 18TH STREET	19121	B	3
43877	909	1901 N 18TH STREET	19121	C	3
43888	909	1800 N BOUVIER ST	19121	A	1
43889	909	1800 N BOUVIER ST	19121	B	5
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

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43918	909	2121 N 15TH STREET	19121	A	1
43919	909	2121 N 15TH STREET	19121	B	6
43946	909	1923 W NORRIS ST	19121	A	2
43947	909	1923 W NORRIS ST	19121	B	3
43986	909	2504 DIAMOND ST	19121	A	4
43987	909	2504 DIAMOND ST	19121	B	4
43988	909	2731 W MONTGOMERY AVE	19121		4
43997	909	1920 N 22ND STREET	19121	B	3
124808	909	1926 N RINGGOLD ST	19121		3
124828	909	2023 W MONTGOMERY AVE	19121		5
124866	909	3102 W BERKS ST	19121	A	3
124871	909	2003 N 17TH STREET	19121	A	4
124872	909	2003 N 17TH STREET	19121	B	4
124893	909	2024 W NORRIS ST	19121		6
124950	909	3020 W SUSQUEHANNA AVE	19121		5
124977	909	1722 FONTAIN ST	19121		5
124978	909	1905 N NAPA ST	19121		3
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
125067	909	1904 N RINGGOLD ST	19121		3
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
125116	909	1912 N STANLEY ST	19121		3
125138	909	1847 N JUDSON ST	19121		3
125140	909	1906 W NORRIS ST	19121		5
125161	909	2701 W BERKS ST	19121		3
125186	909	3009 EUCLID ST	19121		3
125197	909	1918 W NORRIS ST	19121		2
125233	909	1935 W NORRIS ST	19121		5
125284	909	2027 W MONTGOMERY AVE	19121		5
125296	909	1828 N 18TH ST	19121	A	4
125297	909	1828 N 18TH STREET	19121	B	5
125329	909	2142 N CORLIES ST	19121		3
125339	909	1914 N 24TH STREET	19121		6
125345	909	3129 PAGE ST	19121		5
125357	909	3141 WESTMONT ST	19121		3
125368	909	1619 W MONTGOMERY AVE	19121		5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125370	909	3113 FONTAIN ST	19121		3
125374	909	2138 N 19TH STREET	19121		6
125383	909	2140 N 19TH STREET	19121		6
125390	909	1902 N 32ND STREET	19121		5
125397	909	3101 PAGE ST	19121		5
125419	909	1900 N NAPA ST	19121		4
125455	909	3117 PAGE ST	19121		5
125484	909	1840 N ETTING ST	19121		2
125488	909	1866 N JUDSON ST	19121		5
125490	909	1602 FONTAIN ST	19121		5
125520	909	2023 N 18TH STREET	19121		6
125525	909	2152 N NEWKIRK ST	19121		3
125574	909	1919 N 24TH STREET	19121		5
125608	909	1938 N CROSKEY ST	19121		3
125611	909	2710 FRENCH ST	19121		3
125619	909	1835 N 24TH STREET	19121		3
125624	909	3031 W SEDGLEY ST	19121		3
125633	909	2161 N 29TH STREET	19121		5
125642	909	2117 N DOVER ST	19121		2
125655	909	1952 N TAYLOR ST	19121		3
125685	909	1966 N 31ST STREET	19121		3
125688	909	3151 FONTAIN ST	19121		3
125707	909	1902 N CROSKEY ST	19121		4
125750	909	2927 DIAMOND ST	19121		5
125809	909	2126 N VAN PELT ST	19121		4
125829	909	1802 N TANEY ST	19121		3
125831	909	1804 N TANEY ST	19121		3
125849	909	2703 W SEDGLEY ST	19121		5
125870	909	1846 N ETTING ST	19121		2
125896	909	1933 W NORRIS ST	19121		6
125897	909	1853 N 27TH STREET	19121		4
125917	909	3119 PAGE ST	19121		5
135001	909	2000 W. DIAMOND STREET	19121		3
135002	909	2002 W. DIAMOND STREET	19121		3
135003	909	2004 W DIAMOND ST	19121		3
135004	909	2006 W DIAMOND ST	19121		3
135005	909	2008 W DIAMOND ST	19121		3
135006	909	2010 W. DIAMOND STREET	19121		3
135007	909	2012 W. DIAMOND STREET	19121		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
135008	909	2014 W. DIAMOND STREET	19121		3
135009	909	2016 W. DIAMOND STREET	19121		3
135010	909	2018 W DIAMOND ST	19121		3
135011	909	2020 W DIAMOND ST	19121		3
135012	909	2022 W. DIAMOND STREET	19121		3
135013	909	2024 W. DIAMOND STREET	19121		3
135014	909	2001 W. DIAMOND STREET	19121		3
135015	909	2003 W DIAMOND ST	19121		3
135016	909	2005 W DIAMOND ST	19121		4
135017	909	2007 W DIAMOND ST	19121		3
135018	909	2009 W DIAMOND ST	19121		3
135019	909	2011 W. DIAMOND STREET	19121		3
171001	909	1918 N 17TH STREET	19121	A	0
171002	909	1918 N 17TH STREET	19121	B	0
171003	909	1918 N 17TH STREET	19121	C	0
171004	909	1918 N 17TH STREET	19121	D	0
171005	909	1707 W NORRIS STREET	19121	A	0
171006	909	1707 W NORRIS STREET	19121	B	0
171007	909	1707 W NORRIS STREET	19121	C	0
171008	909	1707 W NORRIS STREET	19121	D	0
171009	909	1715 W NORRIS STREET	19121	A	0
171010	909	1715 W NORRIS STREET	19121	B	0
171011	909	1715 W NORRIS STREET	19121	C	0
171012	909	1715 W NORRIS STREET	19121	D	0
171013	909	2009 N 31ST ST	19121	A	0
171014	909	2009 N 31ST ST	19121	B	0
171015	909	2009 N 31ST ST	19121	C	0
171016	909	2009 N 31ST ST	19121	D	0
171017	909	3018 W BERKS ST	19121	A	0
171018	909	3018 W BERKS ST	19121	B	0
171019	909	3018 W BERKS ST	19121	C	0
171020	909	3018 W BERKS ST	19121	D	0
255948	909	1938 N 18TH STREET	19121	A	3
255949	909	1938 N 18TH STREET	19121	B	4
255965	909	2122 N NATRONA ST	19121		3
255967	909	1737 FONTAIN ST	19121		3
690009	909	2228 PAGE ST	19121		3
690013	909	1812 N 27TH STREET	19121		5
690035	909	1823 N 27TH STREET	19121		4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690043	909	2210 W NORRIS ST	19121		3
690070	909	1816 N NEWKIRK ST	19121		3
690071	909	1822 N 26TH STREET	19121		5
690125	909	2120 N 30TH STREET	19121		5
690133	909	2943 W NORRIS ST	19121		3
690154	909	2706 RIDGE AVE	19121		5
690166	909	3039 FONTAIN ST	19121		3
690178	909	3128 W WILT ST	19121		3
690181	909	1932 N TAYLOR ST	19121		3
690212	909	2142 N STANLEY ST	19121		3
690217	909	1914 N 18TH STREET	19121		6
690221	909	1907 N PATTON ST	19121		3
690229	909	3148 W BERKS ST	19121	A	2
690230	909	3148 W BERKS ST	19121	B	6
690305	909	2123 N STANLEY ST	19121		3
690329	909	2952 WESTMONT ST	19121		2
690343	909	3138 W BERKS ST	19121	A	6
690402	909	1816 N CROSKEY ST	19121		3
690407	909	1818 N 28TH STREET	19121		5
690520	909	1806 N BUCKNELL ST	19121		3
690527	909	1830 N 28TH STREET	19121		3
690546	909	3111 FONTAIN ST	19121		3
690547	909	3217 FONTAIN ST	19121		3
690552	909	3017 PAGE ST	19121		3
690557	909	1825 N 26TH STREET	19121		3
690561	909	3020 FONTAIN ST	19121		2
690595	909	1833 N TANEY ST	19121		3
690631	909	1855 N 28TH STREET	19121		3
690698	909	1831 N 28TH STREET	19121		3
690705	909	2911 FRENCH ST	19121		3
690706	909	2913 FRENCH ST	19121		3
690718	909	2920 FRENCH ST	19121		3
690736	909	3036 FONTAIN ST	19121		3
690780	909	1842 N MARSTON ST	19121		2
690782	909	1858 N MARSTON ST	19121		2
690783	909	1821 N MARSTON ST	19121		2
690794	909	1844 N BUCKNELL ST	19121		3
690812	909	3222 W MONTGOMERY AVE	19121		6
690871	909	2133 N NATRONA ST	19121		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690895	909	2945 FRENCH ST	19121		2
690907	909	1925 N NAPA ST	19121		3
690915	909	3153 EUCLID ST	19121	A	1
690916	909	3153 EUCLID ST	19121	B	3
690935	909	1928 N 32ND STREET	19121	A	1
690962	909	1822 N 28TH STREET	19121		5
691030	909	2935 FRENCH ST	19121		2
691055	909	2136 N CORLIES ST	19121		3
691114	909	3019 PAGE ST	19121		3
691116	909	3013 PAGE ST	19121		3
691130	909	1917 N RINGGOLD ST	19121		3
691151	909	1934 N 32ND STREET	19121		5
691164	909	2039 N LAMBERT ST	19121		4
691168	909	1806 N 27TH STREET	19121		5
691213	909	3014 EUCLID ST	19121		3
691242	909	2133 N 32ND STREET	19121		4
691243	909	3121 FONTAIN ST	19121		3
691281	909	2121 N 19TH STREET	19121	A	2
691282	909	2121 N 19TH STREET	19121	B	6
691347	909	3134 W BERKS ST	19121		6
691371	909	3018 FONTAIN ST	19121		3
691377	909	3132 W BERKS ST	19121		5
691406	909	2035 N WOODSTOCK ST	19121		5
691417	909	1948 N 18TH STREET	19121		6
691423	909	2111 N 20TH STREET	19121	A	1
691424	909	2111 N 20TH STREET	19121	B	5
691429	909	2113 N 20TH STREET	19121	A	2
691430	909	2113 N 20TH STREET	19121	B	5
691432	909	2137 N 20TH STREET	19121	A	6
691505	909	1928 N 32ND STREET	19121	B	2
803989	909	2028 N 31ST STREET	19121		3
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
804121	909	3111 PAGE ST	19121		5
804126	909	2022 W NORRIS ST	19121		6
804156	909	3155 EUCLID ST	19121	A	3
804157	909	3155 EUCLID ST	19121	B	4
804189	909	2010 N 22ND STREET	19121	A	5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
804190	909	2010 N 22ND STREET	19121	B	5
804191	909	2010 N 22ND STREET	19121	C	4
804198	909	1829 N CROSKEY ST	19121		4
804199	909	2833 DIAMOND ST	19121	A	2
804200	909	2833 DIAMOND ST	19121	B	6
804216	909	2129 N GRATZ ST	19121	A	1
804217	909	2129 N GRATZ ST	19121	B	3
804218	909	2129 N GRATZ ST	19121	C	3
804233	909	2008 N 22ND STREET	19121	A	5
804234	909	2008 N 22ND STREET	19121	B	5
804235	909	2008 N 22ND STREET	19121	C	4
804249	909	2021 N 17TH STREET	19121	A	3
804250	909	2021 N 17TH STREET	19121	B	5
804267	909	1716 W DIAMOND ST	19121	# A	4
804268	909	1716 DIAMOND ST	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
804319	909	1841 N BOUVIER ST	19121		6
804330	909	1738 MONUMENT AVE	19121	A	3
804331	909	1738 MONUMENT AVE	19121	B	3
804340	909	1840 N 22ND STREET	19121	A	2
804341	909	1840 N 22ND STREET	19121	B	5
804345	909	1806 N 22ND STREET	19121	A	4
804346	909	1806 N 22ND ST	19121	B	4
804347	909	2006 N 22ND STREET	19121	A	5
804348	909	2006 N 22ND STREET	19121	B	4
804349	909	2006 N 22ND STREET	19121	C	4
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
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
804453	909	2044 N 20TH STREET	19121		6
804525	909	1930 N 19TH STREET	19121	A	1

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
804526	909	1930 N 19TH STREET	19121	B	3
804527	909	1930 N 19TH STREET	19121	C	1
804557	909	1721 ARLINGTON ST	19121	A	3
804558	909	1721 ARLINGTON ST	19121	B	3
804605	909	2003 N 18TH STREET	19121	A	4
804606	909	2003 N 18TH STREET	19121	B	4
804607	909	2005 N 18TH STREET	19121	A	4
804608	909	2005 N 18TH STREET	19121	B	4
804612	909	2007 N 18TH STREET	19121	A	4
804613	909	2007 N 18TH STREET	19121	B	4
804616	909	1701 W MONTGOMERY AVE	19121	A	3
804617	909	1701 W MONTGOMERY AVE	19121	B	3
804618	909	1701 W MONTGOMERY AVE	19121	C	3
804634	909	1929 DIAMOND ST	19121	A	3
804635	909	1929 DIAMOND ST	19121	B	2
804636	909	1929 DIAMOND ST	19121	C	3
804641	909	1733 DIAMOND ST	19121	A	3
804642	909	1733 W DIAMOND ST	19121	B	3
804643	909	1733 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
804701	909	3229 W MONTGOMERY AVE	19121	A	1
804702	909	3229 W MONTGOMERY AVE	19121	B	5
818012	909	3124 PAGE ST	19121		3
818014	909	2906 WESTMONT ST	19121		2
818026	909	3115 PAGE ST	19121		5
818034	909	1867 N JUDSON ST	19121		3
818057	909	2123 N NATRONA ST	19121		3
818063	909	2130 N NATRONA ST	19121		3
818072	909	1839 N JUDSON ST	19121		3
818074	909	1834 N 17TH STREET	19121		6
818095	909	1902 N NAPA ST	19121		3
818116	909	1819 N TANEY ST	19121		3
818117	909	1822 N TANEY 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
818194	909	2132 N 19TH STREET	19121		6
818199	909	1844 N 28TH STREET	19121		4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
818216	909	3015 EUCLID ST	19121		3
818231	909	1803 N BOUVIER ST	19121		6
818232	909	1847 N BOUVIER ST	19121		6
818282	909	3109 PAGE ST	19121		5
818283	909	1852 N TANEY ST	19121		3
818298	909	2222 DIAMOND ST	19121		6
818332	909	2018 N 20TH STREET	19121		6
818358	909	1955 N 23RD STREET	19121		3
818386	909	2114 N 19TH STREET	19121		6
818419	909	3132 WESTMONT ST	19121		3
818451	909	1957 N 30TH STREET	19121		3
818457	909	2011 N 32ND STREET	19121		4
818461	909	1857 N JUDSON ST	19121		3
818471	909	3106 W BERKS ST	19121		4
818472	909	1826 N BUCKNELL ST	19121		3
818481	909	3024 W BERKS ST	19121		5
818494	909	1727 FONTAIN ST	19121		4
818498	909	2953 W NORRIS ST	19121		3
818508	909	2149 N NEWKIRK ST	19121		3
818530	909	1923 N 24TH STREET	19121		5
818536	909	3127 PAGE ST	19121		5
857229	909	1635 EDGLEY ST	19121		3
857250	909	2933 W NORRIS ST	19121		3
857259	909	1824 N JUDSON ST	19121		3
857313	909	2133 N CORLIES ST	19121		3
888556	909	2022 N 32ND STREET	19121		6
888561	909	1861 N TAYLOR ST	19121		3
888563	909	3127 W MONTGOMERY AVE	19121		6
888571	909	1920 N NAPA ST	19121		3
888595	909	2139 N 32ND STREET	19121		3
888613	909	1826 N TANEY ST	19121		3
888614	909	1842 N TANEY ST	19121		3
888678	909	1828 N TANEY ST	19121		3
888685	909	1832 N TANEY ST	19121		3
888874	909	1850 N 28TH STREET	19121		3
926762	909	2132 N NATRONA ST	19121		3
926765	909	1946 N NEWKIRK ST	19121		3
926770	909	3132 W PAGE ST	19121		3
41511	910	3205 TURNER ST	19121		5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
41577	910	2922 W MASTER ST	19121		3
41640	910	3021 W HARPER ST	19130		3
41684	910	1734 N HOLLYWOOD ST	19121		2
41685	910	1736 N HOLLYWOOD ST	19121		2
41695	910	2305 TURNER ST	19121		3
41714	910	2338 SEYBERT ST	19121		3
41744	910	2703 W JEFFERSON ST	19121		5
41762	910	1412 N ETTING ST	19121		2
41830	910	2230 INGERSOLL ST	19121		4
41841	910	1402 N ETTING ST	19121		2
41842	910	1406 N ETTING ST	19121		2
41843	910	1408 N ETTING ST	19121		2
41844	910	1410 N ETTING ST	19121		2
41861	910	1312 N 22ND STREET	19121		3
41980	910	2223 STEWART ST	19121		2
41995	910	2429 NICHOLAS ST	19121		5
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
42418	910	2724 CABOT ST	19121		2
42419	910	2726 CABOT ST	19121		2
42425	910	1750 N NEWKIRK ST	19121		3
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
42637	910	1205 N ETTING ST	19121		2
42677	910	2343 W MASTER ST	19121		4
42678	910	2525 SEYBERT ST	19121		2
42679	910	1414 N 25TH STREET	19121		4
42691	910	2042 NICHOLAS ST	19121		4
42730	910	1216 N PENNOCK ST	19121		2
42778	910	1517 N 30TH STREET	19121		4
42819	910	2313 HARLAN ST	19121		2
42820	910	2324 HARLAN ST	19121		2
42837	910	2320 STEWART ST	19121		2

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
42872	910	3027 CLIFFORD ST	19121		3
42927	910	1738 N STILLMAN ST	19121		2
42991	910	1551 N MARSTON ST	19121		3
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
43017	910	2318 W THOMPSON ST	19121		6
43027	910	1922 CAMBRIDGE ST	19130		4
43029	910	3130 CECIL B MOORE AVE	19121	A	3
43030	910	3130 CECIL B MOORE AVE	19121	B	3
43049	910	1236 N 27TH STREET	19121		6
43124	910	2611 W OXFORD ST	19121		4
43176	910	1234 N NEWKIRK ST	19121		3
43185	910	2342 STEWART ST	19121		2
43250	910	2432 W MASTER ST	19121		5
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
43357	910	1548 N MARSTON ST	19121		3
43358	910	1222 N TAYLOR ST	19121		3
43359	910	1767 N TANEY ST	19121		3
43364	910	1310 N 22ND STREET	19121		4
43410	910	1419 N MYRTLEWOOD ST	19121		2
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
43579	910	1708 N 25TH STREET	19121	A	2
43580	910	1708 N 25TH STREET	19121	B	3
43625	910	2721 W GEORGE ST	19130		2
43689	910	2029 N COLLEGE AVE	19121	A	2
43690	910	2029 N COLLEGE AVE	19121	B	6
43691	910	1400 N MARSTON ST	19121		5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
43692	910	1715 N 31ST STREET	19121		5
43702	910	2707 W GEORGE ST	19130		2
43744	910	1225 N 25TH STREET	19121	A	2
43745	910	1225 N 25TH STREET	19121	B	4
43827	910	2440 NICHOLAS ST	19121		5
43836	910	1451 N MARSTON ST	19121		2
43909	910	1432 N CORLIES ST	19121		3
43913	910	1535 N 22ND STREET	19121		5
43950	910	1716 N BONSALL ST	19121		4
124816	910	2714 W MASTER ST	19121		3
124818	910	1303 N 24TH STREET	19121		5
124839	910	2936 W MASTER ST	19121		3
124854	910	1412 N 27TH STREET	19121		4
124856	910	2012 W OXFORD ST	19121		6
124877	910	2314 SEYBERT ST	19121		3
124905	910	1270 N DOVER ST	19121		6
124915	910	1205 N TAYLOR ST	19121		3
124920	910	1702 N 28TH STREET	19121	A	3
124921	910	1702 N 28TH STREET	19121	B	4
124946	910	1320 N 27TH STREET	19121		3
124983	910	1519 N MARSTON ST	19121		3
125001	910	2024 NICHOLAS ST	19121		4
125003	910	1215 N TAYLOR ST	19121		3
125012	910	2438 W MASTER ST	19121		5
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
125167	910	2402 TURNER ST	19121		5
125176	910	2026 NICHOLAS ST	19121		4
125179	910	2517 TURNER ST	19121		5
125214	910	3210 TURNER ST	19121		5
125217	910	1619 N 21ST STREET	19121		5
125273	910	1430 N MYRTLEWOOD ST	19121		2
125293	910	1742 N NATRONA ST	19121		5
125294	910	2517 W OXFORD ST	19121		6
125318	910	2438 HARLAN ST	19121		2
125319	910	1220 N TAYLOR ST	19121		3
125320	910	1518 N 28TH STREET	19121		4
125324	910	1258 N MYRTLEWOOD ST	19121		2

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125350	910	1744 N NATRONA ST	19121		5
125372	910	2224 W JEFFERSON ST	19121		3
125382	910	2940 W FLORA ST	19121		3
125391	910	1323 N 23RD STREET	19121		4
125411	910	1458 N MARSTON ST	19121		2
125422	910	3011 CAMBRIDGE ST	19130		3
125444	910	2913 W THOMPSON ST	19121		4
125463	910	2511 INGERSOLL ST	19121		2
125497	910	1239 N 30TH STREET	19121		2
125502	910	2533 TURNER ST	19121		5
125516	910	2437 NICHOLAS ST	19121		5
125517	910	1728 N 25TH STREET	19121		5
125522	910	1304 N 22ND STREET	19121		5
125524	910	2311 HARLAN ST	19121		2
125544	910	1416 N MARSTON ST	19121		2
125582	910	2316 W THOMPSON ST	19121		4
125584	910	2336 STEWART ST	19121		2
125616	910	2523 TURNER ST	19121		5
125618	910	2415 W OXFORD ST	19121		6
125640	910	1428 N MARSTON ST	19121		2
125643	910	1434 N MARSTON ST	19121		2
125656	910	2451 NICHOLAS ST	19121		5
125665	910	1223 N MYRTLEWOOD ST	19121		3
125679	910	1517 N HOLLYWOOD ST	19121		3
125701	910	1746 N LAMBERT ST	19121		3
125715	910	2429 INGERSOLL ST	19121		2
125722	910	1637 N 29TH STREET	19121		5
125723	910	2437 INGERSOLL ST	19121		2
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
125777	910	1461 N HOLLYWOOD ST	19121		3
125819	910	1433 N NEWKIRK ST	19121		2
125822	910	2427 INGERSOLL ST	19121		2
125835	910	2711 W EYRE ST	19121		3
125853	910	1537 N 29TH STREET	19121		4
125862	910	3017 CABOT ST	19121		2

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125864	910	1235 N 30TH STREET	19121		2
125869	910	1207 N 25TH STREET	19121		6
125877	910	914 N 30TH ST	19130		5
125880	910	2437 CECIL B MOORE AVE	19121		6
125883	910	2710 CAMBRIDGE ST	19130		2
125928	910	1446 N 27TH STREET	19121		4
125931	910	1426 N MYRTLEWOOD ST	19121		2
135020	910	2501 N COLLEGE AVE	19121	A	3
135021	910	2501 N COLLEGE AVE	19121	B	3
135022	910	2503 N COLLEGE AVE	19121	A	3
135023	910	2503 N COLLEGE AVE	19121	B	3
135024	910	2505 N COLLEGE AVE	19121	A	3
135025	910	2505 N COLLEGE AVE	19121	B	3
135026	910	2507 N COLLEGE AVE	19121	A	3
135027	910	2507 N COLLEGE AVE	19121	B	3
135034	910	2401 N COLLEGE AVE	19121		3
135035	910	2403 N COLLEGE AVE	19121		3
135036	910	2405 N COLLEGE AVE	19121		3
135037	910	2407 N COLLEGE AVE	19121		3
135060	910	2409 N COLLEGE AVE	19121		3
135061	910	2411 N COLLEGE AVE	19121		3
135062	910	2413 N COLLEGE AVE	19121		3
135063	910	2415 N COLLEGE AVE	19121		3
172001	910	1403 N 28TH STREET	19121	A	0
172002	910	1403 N 28TH STREET	19121	B	0
172003	910	1403 N 28TH STREET	19121	C	0
172004	910	1403 N 28TH STREET	19121	D	0
172005	910	1919 TURNER STREET	19121	A	0
172006	910	1919 TURNER STREET	19121	B	0
172007	910	1919 TURNER STREET	19121	C	0
172008	910	1919 TURNER STREET	19121	D	0
172009	910	1232 N 27TH STREET	19121	A	0
172010	910	1232 N 27TH STREET	19121	B	0
172011	910	1232 N 27TH STREET	19121	C	0
172012	910	1232 N 27TH STREET	19121	D	0
172013	910	1745 N 31ST STREET	19121	A	0
172014	910	1745 N 31ST STREET	19121	B	0
172015	910	1745 N 31ST STREET	19121	C	0
172016	910	1745 N 31ST STREET	19121	D	0

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
255943	910	1437 N 25TH STREET	19121		3
255951	910	3201 TURNER ST	19121	A	3
255952	910	3201 TURNER ST	19121	B	6
255960	910	1222 N 28TH STREET	19121		6
690001	910	1314 N HOLLYWOOD ST	19121		3
690002	910	1546 N MYRTLEWOOD ST	19121		3
690011	910	1608 N NEWKIRK ST	19121		3
690012	910	1450 N CORLIES ST	19121		3
690023	910	1242 N DOVER ST	19121		3
690024	910	1317 N 23RD STREET	19121		6
690026	910	1520 N NEWKIRK ST	19121		3
690027	910	1518 N NEWKIRK ST	19121		3
690036	910	1519 N NEWKIRK ST	19121		3
690037	910	2320 TURNER ST	19121		3
690039	910	1540 N DOVER ST	19121		3
690042	910	1728 N 26TH STREET	19121		5
690047	910	1453 N CORLIES ST	19121		3
690048	910	1445 N CORLIES ST	19121		3
690049	910	1420 N CORLIES ST	19121		3
690050	910	1416 N HOLLYWOOD ST	19121		3
690052	910	1427 N HOLLYWOOD ST	19121		3
690053	910	1327 N HOLLYWOOD ST	19121		3
690056	910	1246 N DOVER ST	19121		3
690057	910	1256 N DOVER ST	19121		3
690059	910	1225 N HOLLYWOOD ST	19121		3
690063	910	1638 N DOVER ST	19121		3
690065	910	1312 N NEWKIRK ST	19121		3
690073	910	3024 W STILES ST	19121		3
690075	910	2507 W THOMPSON ST	19121		3
690077	910	1713 N TANEY ST	19121		3
690085	910	3016 W STILES ST	19121		3
690086	910	1428 N 30TH STREET	19121		3
690087	910	1507 N HOLLYWOOD ST	19121		3
690093	910	1714 N BAILEY ST	19121		3
690099	910	1715 N JUDSON ST	19121		3
690100	910	1721 N JUDSON ST	19121		3
690112	910	1722 N STILLMAN ST	19121		2
690114	910	1521 N NEWKIRK ST	19121		3
690116	910	2310 W THOMPSON ST	19121		3

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690119	910	2430 CLIFFORD ST	19121		5
690124	910	2332 TURNER ST	19121		3
690136	910	2509 W THOMPSON ST	19121		3
690150	910	1444 N CORLIES ST	19121		3
690169	910	1502 N 19TH STREET	19121	A	2
690170	910	1502 N 19TH STREET	19121	B	3
690171	910	1502 N 19TH STREET	19121	C	3
690174	910	1314 N 22ND STREET	19121		3
690182	910	1504 N 19TH STREET	19121	A	2
690183	910	1504 N 19TH STREET	19121	B	3
690184	910	1504 N 19TH STREET	19121	C	3
690187	910	1243 N 29TH STREET	19121	A	2
690188	910	1243 N 29TH STREET	19121	B	3
690220	910	2422 W MASTER ST	19121		5
690226	910	1506 N 19TH STREET	19121	A	2
690227	910	1506 N 19TH STREET	19121	B	3
690228	910	1506 N 19TH STREET	19121	C	3
690238	910	1508 N 19TH STREET	19121	A	2
690239	910	1508 N 19TH STREET	19121	B	3
690240	910	1508 N 19TH STREET	19121	C	3
690256	910	1510 N 19TH STREET	19121	A	2
690257	910	1510 N 19TH STREET	19121	B	3
690258	910	1510 N 19TH STREET	19121	C	3
690265	910	1516 N 19TH STREET	19121	A	2
690266	910	1516 N 19TH STREET	19121	B	3
690267	910	1516 N 19TH STREET	19121	C	3
690285	910	1753 N TANEY ST	19121		3
690286	910	1518 N 19TH STREET	19121	A	2
690287	910	1518 N 19TH ST	19121	B	3
690288	910	1518 N 19TH STREET	19121	C	3
690304	910	2509 SHARSWOOD ST	19121		3
690341	910	3112 W MONTGOMERY AVE	19121	A	3
690342	910	3112 W MONTGOMERY AVE	19121	B	3
690358	910	1512 N 19TH STREET	19121	A	2
690359	910	1512 N 19TH STREET	19121	B	3
690360	910	1512 N 19TH STREET	19121	C	3
690395	910	2511 SHARSWOOD ST	19121		3
690401	910	1717 N TANEY ST	19121		3
690403	910	2428 NICHOLAS ST	19121		5

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690406	910	1236 N DOVER ST	19121		3
690415	910	1408 N CORLIES ST	19121		3
690416	910	1435 N CORLIES ST	19121		3
690422	910	1224 N TANEY ST	19121		3
690424	910	2232 W MASTER ST	19121		6
690462	910	2711 CABOT ST	19121		3
690570	910	1436 N HOLLYWOOD ST	19121		3
690592	910	1767 N NEWKIRK ST	19121		3
690612	910	2424 CLIFFORD ST	19121		6
690625	910	3029 CAMBRIDGE ST	19130		3
690626	910	2823 W JEFFERSON ST	19121		3
690655	910	1717 N JUDSON ST	19121		3
690662	910	2520 SHARSWOOD ST	19121		3
690684	910	1216 N 30TH STREET	19121		6
690685	910	2425 CECIL B MOORE AVE	19121		6
690689	910	1713 N NEWKIRK ST	19121		3
690690	910	1456 N 30TH STREET	19121		3
690699	910	2736 W MASTER ST	19121		3
690716	910	2512 TURNER ST	19121		5
690727	910	2909 W FLORA ST	19121		2
690730	910	1433 N HOLLYWOOD ST	19121		3
690734	910	1716 N 28TH STREET	19121		3
690738	910	2712 W MASTER ST	19121		3
690739	910	1707 N JUDSON ST	19121		3
690741	910	1312 N HOLLYWOOD ST	19121		3
690750	910	3010 CAMBRIDGE ST	19130		3
690769	910	2423 W MASTER ST	19121		5
690784	910	1442 N CORLIES ST	19121		3
690786	910	2832 W MASTER ST	19121		3
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
690865	910	2421 W OXFORD ST	19121	A	2
690866	910	2421 W OXFORD ST	19121	B	4
690880	910	2423 W OXFORD ST	19121	A	2
690881	910	2423 W OXFORD ST	19121	B	4
690929	910	2405 W OXFORD ST	19121	A	2
690930	910	2405 W OXFORD ST	19121	B	4
690931	910	2425 W OXFORD ST	19121	A	2

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690932	910	2425 W OXFORD ST	19121	B	4
690934	910	1303 N DOVER ST	19121		3
690965	910	1640 N NEWKIRK ST	19121		3
690966	910	1328 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
691064	910	3025 CAMBRIDGE ST	19130		3
691102	910	1434 N 30TH STREET	19121		3
691109	910	2307 N COLLEGE AVE	19121		4
691160	910	1315 N HOLLYWOOD ST	19121		3
691231	910	1335 N HOLLYWOOD ST	19121		3
691232	910	1446 N HOLLYWOOD ST	19121		3
691285	910	3203 TURNER ST	19121	A	2
691286	910	3203 TURNER ST	19121	B	4
691498	910	1311 N 25TH STREET	19121		5
803998	910	2237 W THOMPSON ST	19121	A	3
803999	910	2237 W THOMPSON ST	19121	B	4
804096	910	2429 N COLLEGE AVE	19121	A	3
804097	910	2429 N COLLEGE AVE	19121	B	4
804106	910	2437 N COLLEGE AVE	19121	A	2
804107	910	2437 N COLLEGE AVE	19121	B	3
804108	910	2437 N COLLEGE AVE	19121	C	3
804129	910	3117 CECIL B MOORE AVE	19121	A	3
804130	910	3117 CECIL B MOORE AVE	19121	B	4
804161	910	2425 N COLLEGE AVE	19121	A	2
804162	910	2425 N COLLEGE AVE	19121	B	3
804163	910	2425 N COLLEGE AVE	19121	C	3
804164	910	2427 N COLLEGE AVE	19121	A	3
804165	910	2427 N COLLEGE AVE	19121	B	4
804239	910	1703 N 21ST STREET	19121	A	1
804240	910	1703 N 21ST STREET	19121	B	6
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
804282	910	2704 W GEORGE ST	19130		2
804283	910	2708 W GEORGE ST	19130		2
804290	910	2712 W GEORGE ST	19130		2

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
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
804395	910	2414 W MASTER ST	19121		5
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
804498	910	2027 N COLLEGE AVE	19121	A	1
804499	910	2027 N COLLEGE AVE	19121	B	6
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
804674	910	1729 N 21ST STREET	19121	A	3
804675	910	1729 N 21ST STREET	19121	B	4
804745	910	2231 W OXFORD ST	19121		5
804756	910	2428 TURNER 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
818007	910	2411 TURNER ST	19121		5
818028	910	3020 W HARPER ST	19130		3
818038	910	2426 TURNER ST	19121		5
818062	910	2349 TURNER ST	19121		3
818065	910	2713 W EYRE ST	19121		3
818073	910	1745 N TANEY ST	19121		3
818084	910	1441 N NEWKIRK ST	19121		2
818085	910	1447 N NEWKIRK ST	19121		2
818130	910	2431 CLIFFORD ST	19121		6
818171	910	1716 N MARSTON ST	19121		3
818176	910	3030 W HARPER ST	19130		3
818180	910	2703 W THOMPSON ST	19121		4

UNIT ID	AMP	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
818185	910	1709 N 21ST STREET	19121		6
818202	910	2928 W MASTER ST	19121		4
818236	910	2645 W THOMPSON ST	19121		3
818299	910	3011 W HARPER ST	19130		3
818303	910	1706 N 27TH STREET	19121		5
818326	910	2436 CECIL B MOORE AVE	19121		6
818327	910	2447 NICHOLAS ST	19121		5
818356	910	2715 W EYRE ST	19121		3
818357	910	2717 W EYRE ST	19121		3
818368	910	2415 TURNER ST	19121		5
818369	910	2707 W JEFFERSON ST	19121		3
818372	910	2350 NICHOLAS ST	19121		6
818417	910	2420 CLIFFORD ST	19121		6
818450	910	2445 NICHOLAS ST	19121		5
818474	910	2333 TURNER ST	19121		3
818480	910	2236 SEYBERT ST	19121		3
818528	910	1736 N 25TH STREET	19121		5
857218	910	3030 CAMBRIDGE ST	19130		3
857228	910	1329 N 30TH STREET	19121		2
857242	910	1631 N CORLIES ST	19121		3
857246	910	2430 SHARSWOOD ST	19121		3
888564	910	1757 N BAILEY ST	19121		3
888573	910	2730 W EYRE ST	19121		3
888606	910	2422 W THOMPSON ST	19121		6
888625	910	2435 CECIL B MOORE AVE	19121		6
888642	910	1715 N 26TH STREET	19121		6
888653	910	1719 N CROSKEY ST	19121		6
888809	910	2449 NICHOLAS ST	19121		5
926741	910	2914 CAMBRIDGE ST	19130		5
926764	910	1747 N NEWKIRK ST	19121		3
926775	910	1713 N STILLMAN ST	19121		3

Appendix E: 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 F: 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 most recently completed 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	14,378
# of HCV participants who pay gas heat and are eligible for CRP	2,403
Total gas portion without application of CRP	$357,013
Total gas portion with application of CRP	$81,300
Monthly Savings	$275,713
Annual Savings to PHA	**$3,308,556**

Appendix G: RAD Significant Amendment

Philadelphia Housing Authority
Fiscal Year 2027 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 FY 2027 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 RAD Program.

Pursuant to this Amendment as summarized on the table below and as further described in Attachment 1, PHA plans to undertake the following RAD conversions:

Development Name	Development ID	Building Type	Type of Conversion	# of RAD Units
Avenue V*	N/A	Existing	Restore-Rebuild (Faircloth to RAD)	120
Oxford Village*	N/A	Existing	Restore-Rebuild (Faircloth to RAD)	137
Bernice Arms*	N/A	Existing	Restore-Rebuild (Faircloth to RAD)	46
NewCourtland Tower at Henry Ave	N/A	Rehabilitation	Restore-Rebuild (Faircloth to RAD)	40
			Total	**343**

**As described in* Activity 2025-03: Expanding Affordable Housing Opportunities through Acquisitions*, PHA may acquire these properties in FY 2027 (or late FY 2026). Subject to acquisition, PHA plans to convert these properties to RAD under the Restore-Rebuild initiative (formerly Faircloth to RAD).*

Background

Subject to HUD approval, PHA intends to proceed with the above referenced RAD conversions, pursuant to the guidelines of PIH Notice 2019-23, Revision 4 dated September 5, 2019 and PIH Notice 2016-17 dated November 10, 2016 ("HUD RAD Notices") and any other successor Notices issued by HUD.

Under the Restore-Rebuild initiative (formerly "Faircloth to RAD"), PHA is able to tap into unused public housing Annual Contributions Contract (ACC) authority, develop new public housing units using that authority and then convert the public housing to Project Based Voucher assistance under the RAD program.

PHA is required to 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, including transfers of assistance, at future dates. PHA will provide a thirty-day public comment period, and conduct a Public Hearing 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 future public meeting.

RAD Conversion Plan

This Significant Amendment provides information on PHA's RAD conversion plans as further described in Attachment 1. 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.
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.
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. Note that developments proposed for Restore-Rebuild (formerly Faircloth to RAD) conversion do not currently receive Capital Funds. 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 where applicable.

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.

As part of the RAD 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 enables PHA to leverage existing funds to secure additional private and other funding to undertake long-deferred capital improvements or, in instances where transfer of assistance or Restore-Rebuild (formerly Faircloth to RAD) 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. 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. Please note that the five (5) developments are proposed for conversion under the Restore-Rebuild initiative. As such, they are not currently Public Housing and do not currently have a capital fund allocation assigned.

The RAD conversions will not impact PHA's existing Capital Fund Financing Program (CFFP) obligations. PHA currently projects that it may utilize MTW Block Grant funds for capital improvements and to establish a RAD reserve for the subject developments. Actual amounts will be incorporated into the final financing plan.

Site and Neighborhood Standards

The RAD conversions described herein comply with all applicable site selection and neighborhood review standards. PHA has included individual certifications for each proposed project in Attachment 1. PHA certifies that:

1. The sites are 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; and,

2. In conducting its review of site selection for the proposed projects, 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.

Relocation Plan

Where applicable, resident relocation related to RAD conversions will be performed in accordance with the HUD RAD Notices.

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 conversions.

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 further Significant Amendment to the MTW Plan will not be required for the following RAD-specific actions:

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

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

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

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

- Changes to the project names or sponsor entity names;

- With respect to Restore-Rebuild (formerly Faircloth to RAD) conversions, decisions to reduce or increase the number of subsidized units;

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

Development Name	N/A
PIC Development ID #	N/A
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FFY25)	N/A
Pre-Conversion Total Units	N/A (Restore-Rebuild)
Pre-Conversion Unit Type	N/A
Pre-Conversion Bedroom Size	N/A
Post-Conversion Total Units	200
Post-Conversion RAD Units	120
Post-Conversion Unit Type	Senior
Post- Conversion Development Name and Address	Avenue V 1635 N 5th Street, Philadelphia, PA 19122
Post - Conversion Sponsor	PHADC (or other PHA affiliate)
Project Description	Avenue V is a recently constructed development that has not yet been occupied. The development offers 200 studio and one-bedroom apartments in the South Kensington neighborhood, 120 of which are designated as affordable units; providing a preference for seniors.

Post-Conversion Bedroom Size

	Total # of Units	# of RAD Units
0 BR	51	31
1 BR	149	89
2 BR	0	0
3 BR	0	0
4 BR	0	0
5 BR	0	0

Transfer of Assistance	N/A
De Minimis Reduction	N/A
Transfer of Waiting List	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.

Certification

For the Avenue V Rental Assistance Demonstration (RAD) project located in Philadelphia, the Philadelphia Housing Authority certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. 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; and,

2. 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.

Development Name	N/A
PIC Development ID #	N/A
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FFY25)	N/A
Pre-Conversion Total Units	N/A (Restore-Rebuild)
Pre-Conversion Unit Type	N/A
Pre-Conversion Bedroom Size	N/A
Post-Conversion Total Units	137
Post-Conversion RAD Units	137
Post-Conversion Unit Type	Family
Post- Conversion Development Name and Address	Oxford Village 1522-1538 N 15th St, 1600-1610 N 15th St, 1612-1626 North 15th Street, Philadelphia, PA 19121
Post - Conversion Sponsor	PHADC (or other PHA affiliate)
Project Description	Oxford Village is an existing student development that will offer 137 one-, two-, and three-bedroom units, located near Temple University.

Post-Conversion Bedroom Size

	Total # of Units	# of RAD Units
0 BR	0	0
1 BR	28	28
2 BR	104	104
3 BR	5	5
4 BR	0	0
5 BR	0	0

Transfer of Assistance	N/A
De Minimis Reduction	N/A
Transfer of Waiting List	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.

Certification

For the Oxford Village Rental Assistance Demonstration (RAD) project located in Philadelphia, the Philadelphia Housing Authority certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. 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; and,

2. 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.

Development Name	N/A
PIC Development ID #	N/A
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FFY25)	N/A
Pre-Conversion Total Units	N/A (Restore-Rebuild)
Pre-Conversion Unit Type	N/A
Pre-Conversion Bedroom Size	N/A
Post-Conversion Total Units	46
Post-Conversion RAD Units	46
Post-Conversion Unit Type	Senior
Post- Conversion Development Name and Address	Bernice Arms 6000 Baltimore Avenue, Philadelphia, PA 19143
Post - Conversion Sponsor	PHADC (or other PHA affiliate)
Project Description	Bernice Arms is an existing senior development that will offer 46 one- and two-bedroom units, located near Cobbs Creek Park.

Post-Conversion Bedroom Size

	Total # of Units	# of RAD Units
0 BR	0	0
1 BR	45	45
2 BR	1	1
3 BR	0	0
4 BR	0	0
5 BR	0	0

Transfer of Assistance	N/A
De Minimis Reduction	N/A
Transfer of Waiting List	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.

Certification

For the Bernice Arms Rental Assistance Demonstration (RAD) project located in Philadelphia, the Philadelphia Housing Authority certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. 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; and,

2. 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.

Development Name	N/A
PIC Development ID #	N/A
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FFY25)	N/A
Pre-Conversion Total Units	N/A (Restore-Rebuild)
Pre-Conversion Unit Type	N/A
Pre-Conversion Bedroom Size	N/A
Post-Conversion Total Units	173
Post-Conversion RAD Units	40
Post-Conversion Unit Type	Senior
Post- Conversion Development Name and Address	NewCourtland Tower at Henry Ave 3232 Henry Avenue, Philadelphia, PA 19129
Post - Conversion Sponsor	NewCourtland
Project Description	NewCourtland Tower at Henry Ave is a new housing community in the East Falls neighborhood of Philadelphia. The Tower has 173 residential units, 133 of which are market-rate and 40 of which are designated as affordable units for low-income seniors. NewCourtland has partnered with Inglis to include smart assistive technology in 20 of the units so that it can accommodate individuals with physical disabilities. 10 accessible units will be allocated to the affordable units and 10 will be allocated to the market rate units. All of the units are visitable. The affordable units and accessible units are dispersed throughout the building to create a truly integrated community. Every unit has the same amenities, including in-unit laundry.

Post-Conversion Bedroom Size

	Total # of Units	# of RAD Units
0 BR	28	0
1 BR	131	40
2 BR	11	0
3 BR	3	0
4 BR	0	0
5 BR	0	0

Transfer of Assistance	N/A
De Minimis Reduction	N/A
Transfer of Waiting List	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.

Certification

For the NewCourtland Tower at Henry Ave Rental Assistance Demonstration (RAD) project located in Philadelphia, the Philadelphia Housing Authority certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. 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; and,

2. 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.

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 2019-23, Revision 4 dated September 5, 2019, Sections 1.6.C and 1.6.D and Table 1B.

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

C. PBV Resident Rights and Participation.

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.[36] 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, Section 8(o)(4) of the 1937 Act and 24 CFR § 982.201, concerning eligibility and targeting of

[36] 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.

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, HUD waives Section 8(o)(4) and 24 CFR § 982.201 to the extent necessary for this provision to 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 will otherwise be subject to all requirements of the applicable program, specifically 24 CFR Part 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.

2. **Right to Return.** See Section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

3. **Phase-in of Tenant Rent Increases.** If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10 percent or $25, 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 and must communicate such policy in writing to affected residents. 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 (the first recertification following conversion), as illustrated below.

   Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the 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 [37]

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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

4. **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 participate in the PHA's FSS program.

[37] 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.

The PHA may continue to use any FSS funds already awarded 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. 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 until provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act are implemented, 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 (current, or as amended), 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.[38] Further, upon conversion to PBV, if the PHA no longer has a public housing program, funds already escrowed 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.[39]

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,

[38] 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.

[39] Where the PHA maintains a public housing program, any forfeited funds that had been escrowed prior to conversion would revert to the PHA's Operating Reserves.

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 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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

5. **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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

6. **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 (HUD Form 52530-c), as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

    a. **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 and to non-RAD PBV units located at the Covered Project. 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 :
        i. A reasonable period of time, but not to exceed 30 days:
            1. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
            2. In the event of any drug-related or violent criminal activity or any felony conviction;
        ii. Not less than 14 days in the case of nonpayment of rent; and
        iii. 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.

b. **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 the termination of assistance and several other PHA determinations, PBV program rules require the PHA 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:

i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v),[40] 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.
    1. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(**v**), 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).
    2. For any additional hearings required under RAD, the Project Owner will perform the hearing.
ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.
iii. 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).
iv. 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.

[40] § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

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

   Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

8. **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 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. If the program is continued, the Project Owner must agree to continue to implement the program according to HUD's program requirements. Jobs Plus target public housing projects must enroll public housing residents into the Jobs Plus rent incentive, JPEID, prior to conversion. Any resident of the Covered Project that had not enrolled prior to conversion is not eligible to enroll in JPEID but may utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Covered Project may voluntarily utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion.

9. **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. During any period 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.[41] In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

   Unless a waiver is requested and approved as described below, any new admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or 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

[41] 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.

alternative requirement that the PHA must reinstate the unit after the family has left 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 the Notice.

A PHA may request a waiver from HUD for the Covered Project in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not made a housing assistance payment for a family in 180 days.

For a Covered Project that consists of 100 percent RAD PBV units, the PHA must demonstrate that a waiver is necessary in order to avoid an undue concentration of poverty at the Covered Project. A PHA may evidence this by providing data showing, for example:

- how eligible income-certified applicants on the waiting list must be passed over because their incomes result in zero HAP at admission causing a higher concentration of poverty at the covered project; or
- how the income of newly admitted families is causing a markedly higher concentration of poverty than the PHA's non-RAD PBV projects.

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

For any other Covered Project, the PHA must demonstrate that the property contains specific units (e.g., units suitable for large families or accessible units) for which there are insufficient alternative housing opportunities.

If the waiver is approved, the new admission[s] families covered under the waiver are participants under the program and all of the family obligations and protections under RAD and PBV apply to the family, and the unit is subject to all program requirements. Such waiver requests should be submitted to the PIH Field Office in accordance with Notice PIH 2018-16.

10. **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 for current residents remaining or returning to the Covered Project. MTW agencies may not modify this requirement. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

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. **Ongoing PHA Board Review of Operating Budget.** The Owner must submit to the administering PHA's Board the operating budget for the Covered Project annually. The PHA's Board must confirm that the Project Owner is making deposits into the Reserve for Replacement account in accordance with the RCC as well as assess the financial health of the Covered Project.[42]

3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** These sections have 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 shall 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:

    a. Transferring an existing site-based waiting list to a new site-based waiting list.

[42] 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.

b. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
c. 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.
d. 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 waiting 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).[43]

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's Emergency Transfer Plan. This includes allowing for easier moves between assisted properties.

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). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

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

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. **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 which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC but HUD review of liens must be performed prior to execution.

7. **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

[43] 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.

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 an 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.

8. **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 the following 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.

9. **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.

10. **Initial Certifications and Tenant Rent Calculations**. The Contract Administrator uses the family's public housing tenant rent (reflected on line 10f of the family's most recent HUD Form 50058) at the date of the conversion to calculate the PBV HAP and tenant rent until the effective date of the earlier of the family's first regular or interim recertification following the date of conversion. At the earlier of the family's first regular or interim recertification, the Contract Administrator will use the family's TTP based on the recertification and the HCV utility allowance (or the PBV site-specific utility allowance, if applicable) to determine the PBV HAP and tenant rent. This means that the family pays the same tenant rent as the family was paying under the public housing program until the earlier of first regular or interim reexamination following conversion, at which point the normally applicable PBV calculation for the tenant rent becomes effective. (Under the PBV program, the monthly HAP is the rent to owner minus the tenant rent, and the tenant rent is the family TTP minus the utility allowance.) To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same property as the Covered Project shall be subject to the terms of this provision. To effectuate this provision, HUD is waiving 24 CFR 5.601 and 983.3(c)(6)(iii).

Attachment 1B – Resident Provisions in Conversions of Assistance from Public Housing to PBRA and PBV

This Attachment contains two sections, describing:

1B.1 Summary of Resident Provisions
1B.2 Resident Participation and Funding

1B.1 Summary of Resident Provisions

The following is a summary of special provisions and alternative requirements related to tenants of public housing projects converting under RAD (including for those that will reside in non-RAD PBV units in the Covered project):

- Conversion will be considered a significant action requiring discussion in the PHA's Five-Year Plan, Annual Plan or MTW Plan or requiring a significant amendment to a PHA Plan (see Section 1.5.E. of this Notice);
- Notification of proposed conversion, meetings during the conversion process, written response to residents comments on conversion, and notification of conversion approval and impact (see Section 1.8 of this Notice);
- No rescreening at conversion (see Section 1.6.C.1 of this Notice for conversions to PBV and Section 1.7.B.1. for conversions to PBRA);
- A right to return, which covers the right to return to the rent-assisted property after temporary relocation (when temporary relocation is necessary to facilitate rehabilitation or construction), or the right to occupancy of the new unit if the rental assistance is transferred to a new unit. (See Section 1.4.A.5. of this Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice.)
- Phase-in of tenant rent increases (see Section 1.6.C.3. of this Notice for conversions to PBV and Section 1.7.B.3. for conversions to PBRA);
- Relocation protections, including procedural rights, assistance with moving, and applicable relocation payments. (See Section 1.4.A.5 of this Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice.)
- Continued participation in the ROSS-SC FSS and JobsPlus programs (see Sections 1.6.C.5 and 1.6.C.9 of this Notice, for conversions to PBV and Section 1.7.B.4 for conversions to PBRA);
- Continued Earned Income Disregard (see Section 1.6.C.8 of this Notice, for conversions to PBV and Section 1.7.B.7 for conversions to PBRA);

- Continued recognition of and funding for legitimate residents organizations (see Section 1.6.C.6 of this Notice for conversions to PBV, Section 1.7.B.5 of this Notice for conversions to PBRA, and below in Attachment 1B.2 for additional requirements for both programs);
- Procedural rights consistent with section 6 of the Act (see Section 1.6.C.7. of this Notice for conversions to PBV and Section 1.7.B.6. of this Notice for conversions to PBRA); and
- Choice-mobility option allowing a resident to move with a tenant-based voucher after tenancy in the Covered Project (see 24 CFR § 983.260 for conversions to PBV and Section 1.7.C.5 of this Notice for conversions to PBRA).

The foregoing is a summary of special provisions and alternative requirements relating to residents of public housing projects converting to RAD and does not attempt to capture all program requirements and details. For additional information, refer to the full text of this Notice and to the RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17; PIH 2016-17).

1B.2 Resident Participation and Funding[98]

The following provisions contain the resident participation and funding requirements for public housing conversions to PBRA and PBV, respectively.

A. PBRA: Resident Participation and Funding

Residents of Covered Projects converting assistance to PBRA will have the right to establish and operate a resident organization in accordance with 24 CFR Part 245 (Tenant Participation in Multifamily Housing Projects). In addition, a Project Owner must provide $25 per occupied unit annually for resident participation, of which at least $15 per occupied unit shall be provided to the legitimate tenant organization at the covered property. Resident participation funding applies to all occupied units in the Covered Project as well as units which would have been occupied if not for temporary relocation. These funds must be used for resident education, organizing around tenancy issues, and training activities.

In the absence of a legitimate resident organization at a Covered Project, HUD encourages the Project Owner and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate resident organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owners are also encouraged to actively engage residents in the absence of a resident organization.

Project Owners must make resident participation funds available to residents for organizing activities in accordance with this Notice. Residents must make requests for these funds in writing to the Project Owner. These requests will be subject to approval by the Project Owner. Eligible uses of funds are the same as those permitted under "Guidance on the use of Tenant Participation Funds," Notice PIH 2013-21. The Department strongly encourages residents and Project Owners to resolve questions concerning specific uses of resident participation funds directly. If a dispute over funding arises the resident organization or Project Owner may refer any disputes over funding to the HUD Field Office for intervention only after documented efforts to at direct resolution have proven unsuccessful.

B. PBV: Resident Participation and Funding

To support resident participation following conversion of assistance, residents of Covered Projects converting assistance to the PBV program will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living

[98] For the purposes of this Attachment, HUD uses the term "Project Owner" to refer to the owner of a Converting Project or Covered Project, as applicable to the context.

environment, which includes the terms and conditions of their tenancy as well as activities related to housing and community development.

1. **Legitimate Resident Organization.** A Project Owner must recognize legitimate resident organizations and give reasonable consideration to concerns raised by legitimate resident organizations. A resident organization is legitimate if it has been established by the residents of a Covered Project, meets regularly, operates democratically, is representative of all residents in the project, and is completely independent of the Project Owner, management, and their representatives.

   In the absence of a legitimate resident organization at a Covered Project, HUD encourages the Project Owner and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate resident organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owners are also encouraged to actively engage residents in the absence of a resident organization.

2. **Protected Activities.** Project Owners must allow residents and resident organizers to conduct the following activities related to the establishment or operation of a resident organization:
   - **a.** Distributing leaflets in lobby areas;
   - **b.** Placing leaflets at or under residents' doors;
   - **c.** Distributing leaflets in common areas;
   - **d.** Initiating contact with residents;
   - **e.** Conducting door-to-door surveys of residents to ascertain interest in establishing a resident organization and to offer information about resident organizations;
   - **f.** Posting information on bulletin boards;
   - **g.** Assisting resident to participate in resident organization activities;
   - **h.** Convening regularly scheduled resident organization meetings in a space on site and accessible to residents, in a manner that is fully independent of management representatives. In order to preserve the independence of resident organizations, management representatives may not attend such meetings unless invited by the resident organization to specific meetings to discuss a specific issue or issues; and
   - **i.** Formulating responses to Project Owner's requests for:
     - **i.** Rent increases;
     - **ii.** Partial payment of claims;
     - **iii.** The conversion from project-based paid utilities to resident-paid utilities;
     - **iv.** A reduction in resident utility allowances;
     - **v.** Major capital additions; and

vi. Prepayment of loans.

In addition to these activities, Project Owners must allow residents and resident organizers to conduct other reasonable activities related to the establishment or operation of a resident organization.

Project Owners shall not require residents and resident organizers to obtain prior permission before engaging in the activities permitted in this section.

3. **Meeting Space.** Project Owners must reasonably make available the use of any community room or other available space appropriate for meetings that is part of the multifamily housing project when requested by:
   a. Residents or a resident organization and used for activities related to the operation of the resident organization; or
   b. Residents seeking to establish a resident organization or collectively address issues related to their living environment.

   Resident and resident organization meetings must be accessible to persons with disabilities, unless this is impractical for reasons beyond the organization's control. If the project has an accessible common area or areas, it will not be impractical to make organizational meetings accessible to persons with disabilities.

   Project Owners may charge a reasonable, customary and usual fee, approved by the Secretary as may normally be imposed for the use of such facilities in accordance with procedures prescribed by the Secretary, for the use of meeting space. A PHA may waive this fee.

4. **Resident Organizers.** A resident organizer is a resident or non-resident who assists residents in establishing and operating a resident organization, and who is not an employee or representative of current or prospective Project Owners, managers, or their agents.

   Project Owners must allow resident organizers to assist residents in establishing and operating resident organizations.

5. **Canvassing.** If a Covered Project has a consistently enforced, written policy against canvassing, then a non-resident resident organizer must be accompanied by a resident while on the property of the project.

If a project has a written policy favoring canvassing, any non-resident resident organizer must be afforded the same privileges and rights of access as other uninvited outside parties in the normal course of operations. If the project does not have a consistently enforced, written policy against canvassing, the project shall be treated as if it has a policy favoring canvassing.

A resident has the right not to be re-canvassed against his or her wishes regarding participation in a resident organization.

6. **Funding.** Project Owners must provide $25 per occupied unit annually for resident participation, of which at least $15 per occupied unit shall be provided to the legitimate resident organization at the covered property.[99] These funds must be used for resident education, organizing around tenancy issues, and training activities. Project Owners must make resident participation funds available to residents for organizing activities in accordance with this Notice. Residents must make requests for these funds in writing to the Project Owner. These requests will be subject to approval by the Project Owner. Eligible use of funds are the same as those permitted under "Guidance on the use of Tenant Participation Funds," Notice PIH 2013-21. The Department strongly encourages residents and Project Owners to resolve questions concerning specific uses of resident participation funds directly. If a dispute over funding arises the resident organization or Project Owner may refer any disputes over funding to the Contract Administrator for intervention only after documented efforts to at direct resolution have proven unsuccessful.

[99] Resident participation funding applies to all occupied units in the Covered Project as well as units which would have been occupied if not for temporary relocation.

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

Special Attention of:	**Notice** H 2016-17 PIH 2016-17 (HA)
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	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),

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[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 already 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,

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[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

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[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]

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[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.

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[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

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[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

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[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]

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[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

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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.

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[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

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[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.

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[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

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[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.

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[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

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[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.

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[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,

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[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.

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[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:

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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)).

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[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 temporary 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 permanent 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

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[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.

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[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 only to the extent reasonably necessary 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]

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[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]

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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

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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

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[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

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[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]

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[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.

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[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.

Appendix H: RAD Significant Amendment No. 2

Philadelphia Housing Authority
Fiscal Year 2027 Moving to Work Annual Plan
Rental Assistance Demonstration Significant Amendment No. 2

The Philadelphia Housing Authority (PHA) is incorporating this Rental Assistance Demonstration (RAD) Significant Amendment No. 2 into its FY 2027 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 RAD Program.

Pursuant to this Amendment as summarized on the table below and as further described in Attachment 1, PHA plans to undertake the following RAD conversions:

Development Name	Development ID	Building Type	# of RAD Units
Nayda Cintron Apartments	N/A	New construction	30
17th Street Community Corridor - Phase II	N/A	New construction	38
Germantown YWCA	N/A	Rehabilitation/ adaptive re-use	51
Melville Way	N/A	Rehabilitation	8
Drueding Center Residential	N/A	Rehabilitation	26
		Total	**153**

Background

Subject to HUD approval, PHA intends to proceed with the above referenced RAD conversion, pursuant to the guidelines of PIH Notice 2019-23, Revision 4 dated September 5, 2019 and PIH Notice 2016-17 dated November 10, 2016 ("HUD RAD Notices") and any other successor Notices issued by HUD.

Under the Restore-Rebuild initiative (formerly "Faircloth to RAD"), PHA is able to tap into unused public housing Annual Contributions Contract (ACC) authority, develop new public housing units using that authority and then convert the public housing to Project Based Voucher assistance under the RAD program.

PHA is required to 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, including transfers of assistance, at future dates. PHA will provide a thirty-day public comment period, and conduct a Public Hearing 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 future public meeting.

RAD Conversion Plan

This Significant Amendment provides information on PHA's RAD conversion plans as further described in Attachment 1. 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.
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.
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. Note that developments proposed for Restore-Rebuild (formerly Faircloth to RAD) conversion do not currently receive Capital Funds. 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 where applicable.

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.

As part of the RAD 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 enables PHA to leverage existing funds to secure additional private and other funding to undertake long-deferred capital improvements or, in instances where transfer of assistance or Restore-Rebuild (formerly Faircloth to RAD) 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. 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 RAD conversions will not impact PHA's existing Capital Fund Financing Program (CFFP) obligations. PHA currently projects that it may utilize MTW Block Grant funds for capital improvements and to establish a RAD reserve for the subject developments. Actual amounts will be incorporated into the final financing plan.

Site and Neighborhood Standards

The RAD conversions described herein comply with all applicable site selection and neighborhood review standards. PHA has included individual certifications for each proposed project in Attachment 1. PHA certifies that:

1. The sites are 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; and,

2. In conducting its review of site selection for the proposed projects, 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.

Relocation Plan

Where applicable, resident relocation related to RAD conversions will be performed in accordance with the HUD RAD Notices.

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 conversions.

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 further Significant Amendment to the MTW Plan will not be required for the following RAD-specific actions:

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

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

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

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

- Changes to the project names or sponsor entity names;

- With respect to Restore-Rebuild (formerly Faircloth to RAD) conversions, decisions to reduce or increase the number of subsidized units;

- 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 No. 2
Attachment 1 – Information on Public Housing Developments to be Converted

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

Development Name	N/A
PIC Development ID #	N/A
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FFY25)	N/A
Pre-Conversion Total Units	N/A
Pre-Conversion Unit Type	N/A
Pre-Conversion Bedroom Size	N/A
Post-Conversion Total Units	40
Post-Conversion RAD Units	30
Post-Conversion Unit Type	Family
Post- Conversion Development Name and Address	Nayda Cintron Apartments 515 W. Cumberland St. Philadelphia, PA 19133
Post - Conversion Sponsor	Women's Community Revitalization Project
Project Description	Nayda Cintron Apartments is a new construction development located in the Fairhill neighborhood of North Philadelphia. The development will consist of multifamily building, with one-, two- and three-bedroom units, and two (2) triplexes, with three-bedrooms units.The development will offer 10 ADA accessible units, two (2) units designed for hearing or visual impairments and 36 visitable units.

Post-Conversion Bedroom Size

	Total # of Units	# of RAD Units
0 BR	0	0
1 BR	2	1
2 BR	11	6
3 BR	27	23
4 BR	0	0
5 BR	0	0

Transfer of Assistance	N/A
De Minimis Reduction	N/A
Transfer of Waiting List	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.

Certification

For the Nayda Cintron Apartments Rental Assistance Demonstration (RAD) project located in Philadelphia, the Philadelphia Housing Authority certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. 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; and,

2. 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.

Development Name	N/A
PIC Development ID #	N/A
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FFY25)	N/A
Pre-Conversion Total Units	N/A
Pre-Conversion Unit Type	N/A
Pre-Conversion Bedroom Size	N/A
Post-Conversion Total Units	38
Post-Conversion RAD Units	38
Post-Conversion Unit Type	Family
Post- Conversion Development Name and Address	17th Street Community Corridor - Phase II 1403 N. 17th Street, 1409-1411 N. 17th Street, 1415 N. 17th Street, 1422 N. 17th Street, 1428 N. 17th Street, 1432 N. 17th Street, 1436 N. 17th Street, 1441-1443 N. 17th Street, 1624-1626 Jefferson Street
Post - Conversion Sponsor	Pathways Housing Wellness Corporation
Project Description	17th Street Community Corridor - Phase II is a new construction development located in the Sharswood-Blumberg neighborhood of Philadelphia. The development will consist of six (6) rowhomes and three (3) multifamily buildings, with one-, two- and three-bedroom units. Of these units, 12 will be fully accessible units and two (2) units will have features for the hearing and visually impaired.

Post-Conversion Bedroom Size

	Total # of Units	# of RAD Units
0 BR	0	0
1 BR	20	20
2 BR	12	12
3 BR	6	6
4 BR	0	0
5 BR	0	0

Transfer of Assistance	N/A
De Minimis Reduction	N/A
Transfer of Waiting List	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.

Certification

For the 17th Street Community Corridor - Phase II Rental Assistance Demonstration (RAD) project located in Philadelphia, the Philadelphia Housing Authority certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. 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; and,

2. 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.

PIC Development ID #	N/A
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FFY25)	N/A
Pre-Conversion Total Units	N/A
Pre-Conversion Unit Type	N/A
Pre-Conversion Bedroom Size	N/A
Post-Conversion Total Units	51
Post-Conversion RAD Units	51
Post-Conversion Unit Type	Senior
Post- Conversion Development Name and Address	Germantown YWCA 5820-24 Germantown Avenue, Philadelphia, PA 19144
Post - Conversion Sponsor	KBK Enterprises
Project Description	The Germantown YWCA is an adaptive re-use project that will convert the former YWCA, a historic building, into 51 studio, one- and two-bedroom apartments. The development will include residential amenities, including a fitness room;six (6) units will be fully accessible.

Post-Conversion Bedroom Size

	Total # of Units	# of RAD Units
0 BR	5	5
1 BR	41	41
2 BR	5	5
3 BR	0	0
4 BR	0	0
5 BR	0	0

Transfer of Assistance	N/A
De Minimis Reduction	N/A
Transfer of Waiting List	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.

Certification

For the Germantown YWCA Rental Assistance Demonstration (RAD) project located in Philadelphia, the Philadelphia Housing Authority certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. 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; and,

2. 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.

Development Name	N/A
PIC Development ID #	N/A
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FFY25)	N/A
Pre-Conversion Total Units	N/A
Pre-Conversion Unit Type	N/A
Pre-Conversion Bedroom Size	N/A
Post-Conversion Total Units	8
Post-Conversion RAD Units	8
Post-Conversion Unit Type	Family
Post- Conversion Development Name and Address	Melville Way 4520 Walnut Street, Philadelphia PA 19139
Post - Conversion Sponsor	Families Forward Philadelphia
Project Description	Families Forward Philadelphia will undertake the substantial rehabilitation of Melville Way, a three-story walkup building in the Walnut Hill neighborhood of Philadelphia. Upon completion, the property will offer eight (8) fully renovated units, consisting of six three-bedroom units and two ADA-accessible two-bedroom units.

Post-Conversion Bedroom Size

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

Transfer of Assistance	N/A
De Minimis Reduction	N/A
Transfer of Waiting List	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.

Certification

For the Melville Way Rental Assistance Demonstration (RAD) project located in Philadelphia, the Philadelphia Housing Authority certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. 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; and,

2. 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.

Development Name	N/A
PIC Development ID #	N/A
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FFY25)	N/A
Pre-Conversion Total Units	N/A
Pre-Conversion Unit Type	N/A
Pre-Conversion Bedroom Size	N/A
Post-Conversion Total Units	26
Post-Conversion RAD Units	26
Post-Conversion Unit Type	Family
Post- Conversion Development Name and Address	Drueding Center Residential 413 W Master Street, Philadelphia, PA 19121
Post - Conversion Sponsor	Drueding Center
Project Description	The Drueding Center will complete a rehabilitation of the property, originally built in 1930 in the Olde Kensington neighborhood of Lower North Philadelphia. The rehabilitation will involve a reconfiguration of the layout of the building in order to create 22 two-bedroom units and four (4) three-bedroom units. Additionally, community spaces will be renovated, building systems updated, and overall building accessibility improved. Common amenity spaces will include a community center, leasing/management office, a private outdoor courtyard, sensory room, and free laundry in the basement. Robust social services will be provided by Drueding Center, which has more than three decades of experience working with families at-risk of or experiencing homelessness.

Post-Conversion Bedroom Size

	Total # of Units	# of RAD Units
0 BR	0	0
1 BR	0	0
2 BR	22	22
3 BR	4	4
4 BR	0	0
5 BR	0	0

Transfer of Assistance	N/A
De Minimis Reduction	N/A
Transfer of Waiting List	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.

Certification

For the Drueding Center Residential Rental Assistance Demonstration (RAD) project located in Philadelphia, the Philadelphia Housing Authority certifies that the site complies with all site selection requirements applicable to Project Based Voucher (PBV) RAD projects, including:

1. 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; and,

2. 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.

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 2019-23, Revision 4 dated September 5, 2019, Sections 1.6.C and 1.6.D and Table 1B.

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

C. PBV Resident Rights and Participation.

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.[36] 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, Section 8(o)(4) of the 1937 Act and 24 CFR § 982.201, concerning eligibility and targeting of

[36] 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.

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, HUD waives Section 8(o)(4) and 24 CFR § 982.201 to the extent necessary for this provision to 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 will otherwise be subject to all requirements of the applicable program, specifically 24 CFR Part 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.

2. **Right to Return.** See Section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

3. **Phase-in of Tenant Rent Increases.** If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10 percent or $25, 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 and must communicate such policy in writing to affected residents. 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 (the first recertification following conversion), as illustrated below.

   Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the 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 [37]

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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

4. **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 participate in the PHA's FSS program.

[37] 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.

The PHA may continue to use any FSS funds already awarded 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. 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 until provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act are implemented, 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 (current, or as amended), 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.[38] Further, upon conversion to PBV, if the PHA no longer has a public housing program, funds already escrowed 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.[39]

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,

[38] 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.

[39] Where the PHA maintains a public housing program, any forfeited funds that had been escrowed prior to conversion would revert to the PHA's Operating Reserves.

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 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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

5. **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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

6. **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 (HUD Form 52530-c), as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

    a. **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 and to non-RAD PBV units located at the Covered Project. 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 :
        i. A reasonable period of time, but not to exceed 30 days:
            1. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
            2. In the event of any drug-related or violent criminal activity or any felony conviction;
        ii. Not less than 14 days in the case of nonpayment of rent; and
        iii. 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.

b. **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 the termination of assistance and several other PHA determinations, PBV program rules require the PHA 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:

i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v),[40] 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.
    1. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(**v**), 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).
    2. For any additional hearings required under RAD, the Project Owner will perform the hearing.

ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.

iii. 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).

iv. 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.

[40] § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

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

   Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

8. **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 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. If the program is continued, the Project Owner must agree to continue to implement the program according to HUD's program requirements. Jobs Plus target public housing projects must enroll public housing residents into the Jobs Plus rent incentive, JPEID, prior to conversion. Any resident of the Covered Project that had not enrolled prior to conversion is not eligible to enroll in JPEID but may utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Covered Project may voluntarily utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion.

9. **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. During any period 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.[41] In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

   Unless a waiver is requested and approved as described below, any new admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or 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

[41] 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.

alternative requirement that the PHA must reinstate the unit after the family has left 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 the Notice.

A PHA may request a waiver from HUD for the Covered Project in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not made a housing assistance payment for a family in 180 days.

For a Covered Project that consists of 100 percent RAD PBV units, the PHA must demonstrate that a waiver is necessary in order to avoid an undue concentration of poverty at the Covered Project. A PHA may evidence this by providing data showing, for example:

- how eligible income-certified applicants on the waiting list must be passed over because their incomes result in zero HAP at admission causing a higher concentration of poverty at the covered project; or
- how the income of newly admitted families is causing a markedly higher concentration of poverty than the PHA's non-RAD PBV projects.

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

For any other Covered Project, the PHA must demonstrate that the property contains specific units (e.g., units suitable for large families or accessible units) for which there are insufficient alternative housing opportunities.

If the waiver is approved, the new admission[s] families covered under the waiver are participants under the program and all of the family obligations and protections under RAD and PBV apply to the family, and the unit is subject to all program requirements. Such waiver requests should be submitted to the PIH Field Office in accordance with Notice PIH 2018-16.

10. **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 for current residents remaining or returning to the Covered Project. MTW agencies may not modify this requirement. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

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. **Ongoing PHA Board Review of Operating Budget.** The Owner must submit to the administering PHA's Board the operating budget for the Covered Project annually. The PHA's Board must confirm that the Project Owner is making deposits into the Reserve for Replacement account in accordance with the RCC as well as assess the financial health of the Covered Project.[42]

3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** These sections have 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 shall 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:

    a. Transferring an existing site-based waiting list to a new site-based waiting list.

[42] 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.

b. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
c. 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.
d. 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 waiting 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).[43]

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's Emergency Transfer Plan. This includes allowing for easier moves between assisted properties.

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). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

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

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. **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 which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC but HUD review of liens must be performed prior to execution.

7. **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

[43] 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.

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 an 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.

8. **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 the following 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.

9. **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.

10. **Initial Certifications and Tenant Rent Calculations**. The Contract Administrator uses the family's public housing tenant rent (reflected on line 10f of the family's most recent HUD Form 50058) at the date of the conversion to calculate the PBV HAP and tenant rent until the effective date of the earlier of the family's first regular or interim recertification following the date of conversion. At the earlier of the family's first regular or interim recertification, the Contract Administrator will use the family's TTP based on the recertification and the HCV utility allowance (or the PBV site-specific utility allowance, if applicable) to determine the PBV HAP and tenant rent. This means that the family pays the same tenant rent as the family was paying under the public housing program until the earlier of first regular or interim reexamination following conversion, at which point the normally applicable PBV calculation for the tenant rent becomes effective. (Under the PBV program, the monthly HAP is the rent to owner minus the tenant rent, and the tenant rent is the family TTP minus the utility allowance.) To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same property as the Covered Project shall be subject to the terms of this provision. To effectuate this provision, HUD is waiving 24 CFR 5.601 and 983.3(c)(6)(iii).

Attachment 1B – Resident Provisions in Conversions of Assistance from Public Housing to PBRA and PBV

This Attachment contains two sections, describing:

1B.1 Summary of Resident Provisions
1B.2 Resident Participation and Funding

1B.1 Summary of Resident Provisions

The following is a summary of special provisions and alternative requirements related to tenants of public housing projects converting under RAD (including for those that will reside in non-RAD PBV units in the Covered project):

- Conversion will be considered a significant action requiring discussion in the PHA's Five-Year Plan, Annual Plan or MTW Plan or requiring a significant amendment to a PHA Plan (see Section 1.5.E. of this Notice);
- Notification of proposed conversion, meetings during the conversion process, written response to residents comments on conversion, and notification of conversion approval and impact (see Section 1.8 of this Notice);
- No rescreening at conversion (see Section 1.6.C.1 of this Notice for conversions to PBV and Section 1.7.B.1. for conversions to PBRA);
- A right to return, which covers the right to return to the rent-assisted property after temporary relocation (when temporary relocation is necessary to facilitate rehabilitation or construction), or the right to occupancy of the new unit if the rental assistance is transferred to a new unit. (See Section 1.4.A.5. of this Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice.)
- Phase-in of tenant rent increases (see Section 1.6.C.3. of this Notice for conversions to PBV and Section 1.7.B.3. for conversions to PBRA);
- Relocation protections, including procedural rights, assistance with moving, and applicable relocation payments. (See Section 1.4.A.5 of this Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice.)
- Continued participation in the ROSS-SC FSS and JobsPlus programs (see Sections 1.6.C.5 and 1.6.C.9 of this Notice, for conversions to PBV and Section 1.7.B.4 for conversions to PBRA);
- Continued Earned Income Disregard (see Section 1.6.C.8 of this Notice, for conversions to PBV and Section 1.7.B.7 for conversions to PBRA);

- Continued recognition of and funding for legitimate residents organizations (see Section 1.6.C.6 of this Notice for conversions to PBV, Section 1.7.B.5 of this Notice for conversions to PBRA, and below in Attachment 1B.2 for additional requirements for both programs);
- Procedural rights consistent with section 6 of the Act (see Section 1.6.C.7. of this Notice for conversions to PBV and Section 1.7.B.6. of this Notice for conversions to PBRA); and
- Choice-mobility option allowing a resident to move with a tenant-based voucher after tenancy in the Covered Project (see 24 CFR § 983.260 for conversions to PBV and Section 1.7.C.5 of this Notice for conversions to PBRA).

The foregoing is a summary of special provisions and alternative requirements relating to residents of public housing projects converting to RAD and does not attempt to capture all program requirements and details. For additional information, refer to the full text of this Notice and to the RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17; PIH 2016-17).

1B.2 Resident Participation and Funding[98]

The following provisions contain the resident participation and funding requirements for public housing conversions to PBRA and PBV, respectively.

A. PBRA: Resident Participation and Funding

Residents of Covered Projects converting assistance to PBRA will have the right to establish and operate a resident organization in accordance with 24 CFR Part 245 (Tenant Participation in Multifamily Housing Projects). In addition, a Project Owner must provide $25 per occupied unit annually for resident participation, of which at least $15 per occupied unit shall be provided to the legitimate tenant organization at the covered property. Resident participation funding applies to all occupied units in the Covered Project as well as units which would have been occupied if not for temporary relocation. These funds must be used for resident education, organizing around tenancy issues, and training activities.

In the absence of a legitimate resident organization at a Covered Project, HUD encourages the Project Owner and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate resident organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owners are also encouraged to actively engage residents in the absence of a resident organization.

Project Owners must make resident participation funds available to residents for organizing activities in accordance with this Notice. Residents must make requests for these funds in writing to the Project Owner. These requests will be subject to approval by the Project Owner. Eligible uses of funds are the same as those permitted under "Guidance on the use of Tenant Participation Funds," Notice PIH 2013-21. The Department strongly encourages residents and Project Owners to resolve questions concerning specific uses of resident participation funds directly. If a dispute over funding arises the resident organization or Project Owner may refer any disputes over funding to the HUD Field Office for intervention only after documented efforts to at direct resolution have proven unsuccessful.

B. PBV: Resident Participation and Funding

To support resident participation following conversion of assistance, residents of Covered Projects converting assistance to the PBV program will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living

[98] For the purposes of this Attachment, HUD uses the term "Project Owner" to refer to the owner of a Converting Project or Covered Project, as applicable to the context.

environment, which includes the terms and conditions of their tenancy as well as activities related to housing and community development.

1. **Legitimate Resident Organization.** A Project Owner must recognize legitimate resident organizations and give reasonable consideration to concerns raised by legitimate resident organizations. A resident organization is legitimate if it has been established by the residents of a Covered Project, meets regularly, operates democratically, is representative of all residents in the project, and is completely independent of the Project Owner, management, and their representatives.

   In the absence of a legitimate resident organization at a Covered Project, HUD encourages the Project Owner and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate resident organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owners are also encouraged to actively engage residents in the absence of a resident organization.

2. **Protected Activities.** Project Owners must allow residents and resident organizers to conduct the following activities related to the establishment or operation of a resident organization:
   - **a.** Distributing leaflets in lobby areas;
   - **b.** Placing leaflets at or under residents' doors;
   - **c.** Distributing leaflets in common areas;
   - **d.** Initiating contact with residents;
   - **e.** Conducting door-to-door surveys of residents to ascertain interest in establishing a resident organization and to offer information about resident organizations;
   - **f.** Posting information on bulletin boards;
   - **g.** Assisting resident to participate in resident organization activities;
   - **h.** Convening regularly scheduled resident organization meetings in a space on site and accessible to residents, in a manner that is fully independent of management representatives. In order to preserve the independence of resident organizations, management representatives may not attend such meetings unless invited by the resident organization to specific meetings to discuss a specific issue or issues; and
   - **i.** Formulating responses to Project Owner's requests for:
     - **i.** Rent increases;
     - **ii.** Partial payment of claims;
     - **iii.** The conversion from project-based paid utilities to resident-paid utilities;
     - **iv.** A reduction in resident utility allowances;
     - **v.** Major capital additions; and

vi. Prepayment of loans.

In addition to these activities, Project Owners must allow residents and resident organizers to conduct other reasonable activities related to the establishment or operation of a resident organization.

Project Owners shall not require residents and resident organizers to obtain prior permission before engaging in the activities permitted in this section.

3. **Meeting Space.** Project Owners must reasonably make available the use of any community room or other available space appropriate for meetings that is part of the multifamily housing project when requested by:
   a. Residents or a resident organization and used for activities related to the operation of the resident organization; or
   b. Residents seeking to establish a resident organization or collectively address issues related to their living environment.

   Resident and resident organization meetings must be accessible to persons with disabilities, unless this is impractical for reasons beyond the organization's control. If the project has an accessible common area or areas, it will not be impractical to make organizational meetings accessible to persons with disabilities.

   Project Owners may charge a reasonable, customary and usual fee, approved by the Secretary as may normally be imposed for the use of such facilities in accordance with procedures prescribed by the Secretary, for the use of meeting space. A PHA may waive this fee.

4. **Resident Organizers.** A resident organizer is a resident or non-resident who assists residents in establishing and operating a resident organization, and who is not an employee or representative of current or prospective Project Owners, managers, or their agents.

   Project Owners must allow resident organizers to assist residents in establishing and operating resident organizations.

5. **Canvassing.** If a Covered Project has a consistently enforced, written policy against canvassing, then a non-resident resident organizer must be accompanied by a resident while on the property of the project.

If a project has a written policy favoring canvassing, any non-resident resident organizer must be afforded the same privileges and rights of access as other uninvited outside parties in the normal course of operations. If the project does not have a consistently enforced, written policy against canvassing, the project shall be treated as if it has a policy favoring canvassing.

A resident has the right not to be re-canvassed against his or her wishes regarding participation in a resident organization.

6. **Funding.** Project Owners must provide $25 per occupied unit annually for resident participation, of which at least $15 per occupied unit shall be provided to the legitimate resident organization at the covered property.[99] These funds must be used for resident education, organizing around tenancy issues, and training activities. Project Owners must make resident participation funds available to residents for organizing activities in accordance with this Notice. Residents must make requests for these funds in writing to the Project Owner. These requests will be subject to approval by the Project Owner. Eligible use of funds are the same as those permitted under "Guidance on the use of Tenant Participation Funds," Notice PIH 2013-21. The Department strongly encourages residents and Project Owners to resolve questions concerning specific uses of resident participation funds directly. If a dispute over funding arises the resident organization or Project Owner may refer any disputes over funding to the Contract Administrator for intervention only after documented efforts to at direct resolution have proven unsuccessful.

[99] Resident participation funding applies to all occupied units in the Covered Project as well as units which would have been occupied if not for temporary relocation.

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

Special Attention of:	**Notice** H 2016-17 PIH 2016-17 (HA)
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	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),

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[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 already 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,

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[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

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[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]

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[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.

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[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

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[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

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[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]

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[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

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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.

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[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

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[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.

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[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

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[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.

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[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

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[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.

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[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,

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[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.

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[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:

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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)).

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[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 temporary 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 permanent 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

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[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.

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[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

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[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 only to the extent reasonably necessary 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]

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[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]

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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

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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

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[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

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[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]

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[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.

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[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.

RESOLUTION NO. 12491

RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY TO SUBMIT TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT AMENDMENT #2 TO ITS MOVING TO WORK ANNUAL PLAN FOR FISCAL YEAR 2027

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, since 2001, when HUD accepted PHA's application for participation in the MTW Demonstration Program and HUD and PHA subsequently executed a MTW Demonstration Agreement ("MTW Agreement"), PHA has continuously participated in the MTW Demonstration Program, with its current agreement extending to 2038; 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 ("FY"), with FY 2027 beginning on April 1, 2026; and

WHEREAS, the Board approved the FY 2027 Annual Plan on December 18, 2025, which was subsequently approved by HUD on May 13, 2026, and the Board approved Amendment #1 to the FY 2027 Annual Plan on April 16, 2026, which was subsequently approved by HUD on June 11, 2026; and

WHEREAS, PHA has distributed to the Board Plan Amendment #2 to the FY 2027 MTW Annual Plan, which incorporates a Rental Assistance Demonstration ("RAD") Significant Amendment for the potential conversion to Project-Based Vouchers ("PBV") of the following developments: 1) thirty (30) units at Nayda Cintron Apartments; 2) thirty-eight (38) units at 17th Street Community Corridor – Phase II; 3) fifty-one (51) units at Germantown YWCA; 4) eight (8) units at Melville Way; and 5) twenty-six (26) units at Drueding Center Residential, and Plan Amendment #2 updates the MTW Annual Plan Table 1, "Planned New Public Housing Units;" and

WHEREAS, PHA has fulfilled the HUD requirement of providing opportunities for resident and public participation and comment on Amendment #2 to the FY 2027 MTW Annual Plan, including scheduling at least one (1) public hearing and taking into consideration any comments received, by: 1) holding an introductory meeting with resident leadership and interested PHA residents on June 10, 2026; 2) holding a virtual Public Hearing on June 23, 2026; 3) posting the draft Plan and amendment on PHA's website; 4) making copies of the draft Plan and amendment available at PHA's Headquarters; and 5) accepting and considering public comments over a period extending from June 1, 2026 to June 30, 2026;

BE IT RESOLVED that the Board of Commissioners hereby approves Amendment #2 to the FY 2027 MTW Annual Plan, 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 Amendment #2 to the FY 2027 MTW Annual Plan; 2) take all steps necessary to finalize and secure HUD approval and implement initiatives described in Amendment #2, 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 7/16/2026

ATTORNEY FOR PHA

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 Chair 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 (04/01/2026), 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 (42 USC 2000d-1), the Fair Housing Act (42 USC 3601 et seq.), section 504 of the Rehabilitation Act of 1973 (29 USC 794), title II of the Americans with Disabilities Act of 1990 (42 USC 12131 et seq.), the Violence Against Women Act (34 USC 12291 et seq.), all regulations implementing these authorities; and other applicable Federal, State, and local fair housing and civil rights laws.

(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 signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies, for the PHA's jurisdiction and a description of the way the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).

(7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take 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 requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR 5.151). The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.

(9) In accordance with the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity),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 75.

(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 accordance with the Byrd Amendment,31 U.S.C. § 1352.

(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 2 CFR 200.334 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 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), as applicable.

(21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.

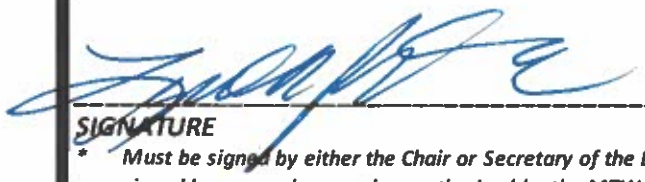
(22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

(23) 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 and should be made available electronically, upon request.

Philadelphia Housing Authority _____ ***PA002*** _____
MTW PHA NAME ***MTW PHA NUMBER/PHA CODE***

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Lynette Brown-Sow — Board Chair
NAME OF AUTHORIZED OFFICIAL ***TITLE***



7/16/2026
SIGNATURE ***DATE***

* ***Must be signed by either the Chair 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 Chair or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.***