Inventory Removal Application

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

OMB Approval No. 2577-0075
(exp. 08/31/2014)

Public reporting burden for this collection of information is estimated to average 8 hours 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. HUD may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number. This information is required to request permission to remove from inventory all or a portion of a public housing development (i.e. dwelling unit(s), non-dwelling property or vacant land) owned by a Public Housing Agency (PHA). The information requested in this application is based on requirements of Sections 18, 22, 32, and 33 of the United States Housing Act of 1937 as amended ("Act"), 24 CFR Parts 906, 970, and 972 (HUD Regulations), and HUD's interest in property of PHAs under Annual Contribution Contracts and Declarations of Trust. HUD will use this information to determine whether, and under what circumstances, to permit PHAs to remove from their inventories all or a portion of a public housing development, as well as to track removals for other record keeping requirements. Responses to this collection of information are statutory and regulatory to obtain a benefit. Please refer to the instructions for each section for additional guidance on how to complete this application. HUD approval of the proposed removal from inventory action in this application does not constitute HUD approval for funding of the proposed action. All capitalized terms not defined in this form have the meanings as defined in the Act and HUD Regulations. The information requested does not lend itself to confidentiality.

Section I: General Information		
PHA Name:	**Date of Application:**	
PHA Address:		
No. and Street:	**City and State:**	**Zip Code:**
Phone Number:	**Fax Number:**	**E-mail Address:**
Executive Director's Name:	**Executive Director's Phone Number:**	**Executive Director's Email:**
Primary Contact's Name:	**Primary Contact's Phone Number:**	**Primary Contact's Email:**

Section 2: Long-Term Possible Financial Impact of Proposed Action

1. Operating Subsidy
In FY , this PHA received $ per unit in operating subsidy.
This PHA realizes that after HUD approves this proposed action, this PHA's operating subsidy will decrease by $ / year (number of units subject to this proposed action X subsidy per unit)

2. Capital Fund Program (CFP)
In FY , this PHA received $ per unit in CFP funds.
This PHA realizes that after this proposed action takes place, CFP funds will decrease by approximately $ /year (number of units subject to this proposed action X CFP funds/unit):

Section 3: PHA Board Resolution, Environmental Review, and Government Consultation

PHA Board Resolution

1. Board Resolution Number:
2. Date of PHA Board Resolution:

Attach a copy of the PHA Board Resolution and reference it as Section 3, line 1.

Environmental Review

3. Identify the Responsible Entity that is conducting the environmental review under 24 CFR 58:
Or if HUD is conducting the environmental review under 24 CFR 50, check here:

Government Consultation
4. This PHA covers the following jurisdictions (list all municipalities, counties, etc.): ***Attach a narrative describing the PHA's consultation with all Appropriate Government Officials (AGOs) and reference it as Section 3, line 4.***
5. This PHA has obtained all necessary Letters of Support from all Appropriate Government Official(s) about this proposed action and the Letter(s) of support is (are) dated (mm/dd/yy) ***Attach copies of all Letters of Support from the AGOs and reference them as Section 3, line 5.***

Section 4: Description of the Existing Development
1. Name of the Development:
2. Development Number:
3. Date of Full Availability:
4. No. of Residential Building:
5. No of Non-Residential Building:
6. Date Constructed:
7. Is the Development a Scattered Site: Yes No
8. No. of Building Types: Single Family Houses Duplexes 3-Plexes 4-plexes Other (explain)
9. No. of Types of Structures Row House Units Walk-Up Units High Rise Unit
10. Total Acres of the Development:

11. Existing Unit Distribution	Family Units	Elderly Units	Total Units Being Used for Non-Dwelling Purposes	Total Units in Development
0 Bedroom				
1 Bedroom				
2 Bedrooms				
3 Bedrooms				
4 or more Bedrooms				
Total *				
*Enter in Section 6, line 1b				

Section 5: Description of Proposed Action by Development, Method of Sale, Value, and Net Proceeds

1. Type of action proposed: Check One:

Complete Demolition
Partial Demolition
Disposition Only
Demolition and Disposition
De Minimis Demolition
Required Conversion
Voluntary Conversion
Homeownership
Eminent Domain Proceeding
HOPE VI Demolition
Disposition—24 CFR 941-Subpart F Exception
Casualty Loss

2. Proposed Action by Unit Type	Units to be Demolished Only	Units to be Disposed of Only
0 Bedroom –Elderly		
0 Bedroom –Family		
1 Bedroom—Elderly		
1 Bedroom—Family		
2 Bedrooms—Elderly		
2 Bedrooms—Family		
3 Bedrooms—Family		
4 or more Bedrooms--Family		
Total *		

*Enter in Section 6, line 1a

3. Proposed Action by Building Type	Buildings to be Demolished Only	Buildings to be Disposed of Only
Residential Buildings		
Non-Residential Buildings		
Total Buildings		

4. If the proposed action involves a disposition, Total number of acres in proposed disposition:

5. If the proposed action involves a partial removal of a Development, a site map is required.
Attach a site map and reference it as Section 5, line 5.

6. If the proposed action involves a partial removal of a Development,

Attach a description of the property (address, building number, unit number) to be removed along with a narrative explaining why the PHA is proposing to remove this portion of the Development and reference it as Section 5, line 6

Method of Sale

If the PHA is proposing a disposition , answer questions No. 7-10:

7. Which of the following describe the proposed disposition:
A. ☐ Disposition at Fair Market Value (FMV)
B. ☐ Disposition at less than Fair Market Value (e.g. donation)
C. ☐ Disposition which includes an exchange of property

If B or C is checked,
Attach a narrative providing a justification (which evidences public benefits to the PHA and its residents commensurate with the proposed compensation) and reference it as Section 5, line 7

Value

8. What is the value of the property subject to the proposed disposition action: $
Please attach required documentation verifying this value (e.g. appraisal) and reference it as Section 5, line 8.

9. Was an appraiser used to determine the value for the property listed at Number 8 above?
Yes ☐ No ☐

If Yes, name of appraiser who conducted the appraisal: Date of appraisal:

Net Proceeds

10. Calculation of Net Proceeds:

Estimated Sales Price	minus	Debt	minus	Cost & Fees	equals	Estimated Net Proceeds
$_____	-	$_____	-	$_____	=	$_____

Attach an itemization of costs and fees (including relocation, moving, and counseling costs) to be paid out of gross proceeds and reference it as Section 5, line 10

11. How does this PHA propose to use Net Proceeds:

Attach a narrative providing details concerning the use of Net Proceeds and reference it as Section 5, line 11.

12. If the proposed action involves a Demolition:
(a) Total estimated cost of the Demolition: $_____ (include professional fees, hazardous waste removal, building and site improvements, actual demolition costs, and seeding and sodding of land, but do not include relocation costs or site improvements such as landscaping, playground, retaining walls, streets, sidewalks, etc.)
(b) What source(s) of funding will the PHA use to pay for the cost of demolition?
(☐ Operating Funds for FY _____ (☐) CFP for FY _____ (☐ CDBG Funds (☐ Other
If Other, attach a narrative explaining how the PHA will fund the demolition and reference it as Section 5, line 12.

13. General Timetable: Complete the general timetable below based on the number of days after HUD approval of this proposed action that the PHA will engage in the following actions:
(a) Begin Relocation of Residents: _____
(b) Complete Relocation of Residents: _____
(c) Execute contract for removal action (e.g. sales contract): _____
Cause occurrence of removal action (e.g. actual demolition, closing of sale): _____

Section 6: Relocation

1. Occupied Units

(a) Of the (copy number from Section 5, line 2) units proposed for removal, are occupied as of the date of this Application.

Attach a narrative explaining the circumstances that resulted in the units becoming vacant and the relocation of the residents of the affected Development and reference it as Section 6, line 1(a).

(b) Of the (copy from Section 4, line 10) total units in the Development minus (copy from 1(a) above) to be removed, units will remain after removal.

(c) Of the (copy from 1(b) above) units remaining after removal, are occupied as of the date of this Application.

If any units are listed as occupied in 1(a), complete questions 2-8

2. Individuals (including children) will be affected by this removal action.

3. How will the PHA provide counseling and advisory services to the affected residents?

Attach a narrative explaining how the PHA will provide counseling and advisory services and reference it as Section 6, line 3.

4. What housing resources/replacement housing does the PHA expect to use for relocation of the affected residents?

Other Public Housing Housing Choice Vouchers Other

Attach a narrative explaining how the PHA plans to provide relocation housing and reference it as Section 6, line 4.

5. Estimated Cost of Counseling and Advisory Services: $

6. Estimated Cost of Moving Expenses: $

7. Total Cost of Relocation Expenses: $

8. What source(s) of funding will the PHA use to pay for Relocation Expenses?

( ) Operating Funds for FY ( ) CFP for FY ( ) Other

If Other, attach a narrative explaining how the PHA will fund Relocation Expenses and reference it as Section 6, line 8.

Section 7: Resident Consultation

1. Consultation with Residents at affected Development

Attach a narrative explaining the PHA's consultation with the residents of the affected Development and reference it as Section 7, line 1.

If proposed action is for Demolition and/or Disposition under Section 18 of the Act, complete questions 2-5

2. Resident Council (at affected Development)

Provide the name of the Resident Council representing the residents of the affected Development: or if there is no Resident Council at this Development, check here .

Attach a narrative explaining the PHA's consultation with the Resident Council of the affected Development and reference it as Section 7, line 2.

3. Resident Council (PHA jurisdiction-wide)

Provide the name of the Resident Council representing the interests of the residents residing in units under the PHA's jurisdiction: , or if there is no such Resident Council, check here .

Attach a narrative explaining the PHA's consultation with Resident Council (PHA jurisdiction-wide), and reference it as Section 7, line 3.

4. Resident Advisory Board (RAB) (as defined by 24 CFR 903.13)

Attach a narrative explaining the PHA's consultation with RAB and reference it as Section 7, line 4.

5. Did the PHA receive any written comments concerning this proposed action from the residents of the affected Development, the Resident Council at the affected Development), the Resident Council (PHA jurisdiction-wide), or theRAB? Yes No . If yes,

Attach those written comments, along with any evaluation the PHA has made of those comments and reference it as Section 7, line 5.

Section 8: Offer of Sale (This Section must be completed for all Section 18 Dispositions, including dispositions in connection with Voluntary or Required Conversions that are subject to Section 18 requirements)

1. Is this PHA exercising any of the exceptions to the offer of sale requirement permitted by 24 CFR 970.9(b)(3):
Yes ☐ No ☐

2. If "Yes", check the exception below:

☐ 24 CFR 970.9 (b)(3)(i): a unit of state or local government requests to acquire vacant land that is less than two acres in order to build or expand its public services (a local government wishes to use the land to build or establish a police substation);
☐ 24 CFR 970.9 (b)(3)(ii): the PHA seeks disposition outside the public housing program to privately finance or otherwise develop a facility to benefit low-income families (e.g., day care center, administrative building, mixed-finance housing, or other types of low-income housing);
☐ 24 CFR 970.9 (b)(3)(iii): the units that have been legally vacated in accordance with the HOPE VI program, the regulations at 24 CFR Part 971, or the Required Conversion regulations at 24 CFR part 972, excluding developments where the PHA has consolidated vacancies;
☐ 24 CFR 970.9 (b)(3)(iv): the units are distressed units required to be converted to tenant-based assistance under Section 33 of the Act;
☐ 24 CFR 970.9 (b)(3)(v): the proposed disposition is of non-dwelling property, including administration and community buildings, and maintenance facilities.

Attach documentation supporting the above referenced exception and reference it as Section 8, line 2.

3. If "No", state the names of all Established Eligible Organizations (as defined by 24 CFR 970.9(c)) for the affected Development, including the following organizations:

Resident Council at affected Development:
,or if none, check here
Resident Management Corporation (as defined by 24 CFR 964) at affected Development:
, or if none, check here
Outside Organization acting on behalf of the residents of the affected Development (as defined by 24 CFR 964):
, or if neither the Resident Council nor any outside organization has provided the PHA with any notification that the Resident Council has formed a partnership with an outside, check
Attach a narrative explaining how the PHA determined that the above named organizations are all of the Established Eligible Organizations representing the residents at the affected Development and reference it as Section 8, line 3.

4. The PHA sent an initial written notification of the sale of the affected Development to each Established Eligible Organization on (mm/dd/yy) via ☐ regular mail ☐ certified mail.
Attach a copy of each signed and dated initial written notification letter provided to Established Eligible Organizations and reference them as Section 8, line 4.

5. The PHA received a written initial expression of interest (as defined by 24 CFR 970.11(b)) from one or more of the Notified Eligible Established Organization(s) within 30 days from the date it sent the initial written notification of sale:
Yes ☐ No ☐
If Yes, attach a copy of each initial expression of interest that the PHA received and reference as Section 8, line 5.

6. The PHA received a proposal to purchase the affected Development from this Eligible Established Organization within 60 days of the date that it provided the organization with all necessary terms and information to prepare and submit a proposal to purchase the Development:
Yes ☐ No ☐
If yes, attach a copy of the proposal to purchase and reference them as Section 8, line 6.

7. The PHA ☐ Rejected or ☐ Accepted the organization's proposal to purchase the affected the Development

Section 9: Certification ***Attach a copy of the applicable Certification (as a scanned PDF file) for the specific inventory removal action identified in Section 5 of this Application.***
Section 18 Demolition/Disposition PHA Certification
Section 18 Disposition (24 CFR 941 Subpart F) PHA Certification
Section 32 Homeownership PHA Certification
Section 33 Required Conversion PHA Certification
Section 22 Voluntary Conversion PHA Certification
De Minimis Demolition PHA Certification
Eminent Domain PHA Certification

ADDENDUMS:

The following additional forms must be attached to your electronic submission of this 52860 Application for the inventory removal actions referenced below. Please attach these forms as a file, or scan the form and attach it as a PDF file

HUD-52860-B: **Total Development Cost (TDC) Calculation**	**Attach for all Demolition actions and for all Disposition actions where the justification is obsolescence**
HUD-52860-C: Homeownership	**Attach for all actions involving homeownership**
HUD-52860-D: Required Conversion	**Attach for all actions involving the required conversion of public housing units**
HUD-52860-E: Voluntary Conversion	**Attach for all actions involving the voluntary conversion of public housing units**
HUD-52860-F: Eminent Domain	**Attach for all disposition actions involving eminent domain proceedings**

Instructions for completing the Inventory Removal Application (Form HUD-52860):

HUD's Special Applications Center (SAC) is responsible for reviewing and approving all proposed inventory removal actions covered by this Application. SAC is a center within the HUD's Office of Public Housing Investments (OPHI), which is within HUD's Office of Public and Indian Housing. Unless specifically approved by an authorized management agent of the SAC, PHAs must submit this Application on-line via the Inventory Removals Module of the Public and Indian Housing Information Center (PIC). See the PIC website at (www.hud.gov/offices/pih/systems/pic) for detailed instructions on this system. HUD is providing a paper copy of this application to assist PHAs with their on-line application and as a reference sources to individuals and organizations without PIC access rights. These instructions constitute the processing requirements for each of the possible removal of inventory actions and provide explanations for those questions that may not be self-explanatory. Please complete the information requested for the proposed action being requested. If you have any questions about how to complete this application, contact an authorized management agent of the SAC.

Attachments:
Please provide all attachments requested in this application (as scanned PDF files). All attachments must reference the Section and line number to which they apply. For applications submitted on-line using the PIC system, attachments should include filenames that are no longer than 25 characters (including the file type ending, e.g., "doc") and should conform to Windows Explorer file name rules (e.g. file names with spaces must be enclosed in quotation marks)

Example: Filename as shown in MS Word: PIC FAQ Ideas.doc;
Filename to attach to PIC application: "PIC FAQ Ideas.doc"
Alternatively, the file name can be revised by submitting underscores "_" for spaces.

Submission, Review, and Approval of Inventory Removal Actions:
Refer to the following chart for guidance submission, review, and approval of proposed inventory removal actions (Refer also to the Detail Matrix for application submission specifics):

Demolition and/or Disposition (Section 18)	--PHA submits application on-line via PIC --SAC reviews and approves application
Eminent Domain Proceeding	--PHA submits application on-line via PIC --SAC reviews and approves application
Disposition—24 CFR 941(Subpart F) (*After the Detailed Matrix, please see additional explanation about these dispositions)	--PHA submits application on-line via PIC --SAC reviews and approves application via a "streamlined" review and approval process (See Detailed Matrix)
Demolition—De Minimus Exception (In any 5 year period, a PHA may demolish 5% of its dwelling units or 5 dwelling units, whichever is less)	--PHA submits data sufficient to reflect the anticipated change in PHA inventory on-line via PIC --HUD approval not required, however, PHA must submit required data into PIC before commencing demolition
Demolition—HOPE VI Revitalization Exception	--Demolition approved by HUD as part of Revitalization; SAC staff enters data with the assistance of Grant Manager
Required Conversion (Section 33)	--PHA submits application on-line via PIC --PHA submits proposed action to HUD Field Office as part of its PHA Plan --SAC and OPHI review application & OPHI approves application
Voluntary Conversion (Section 22)	--PHA submits application on-line via PIC --PHA submits proposed action to HUD Field Office as part of its PHA Plan --SAC and OPHI review application & OPHI approves application
Homeownership (Section 32)	--PHA submits application on-line via PIC --SAC reviews and approves application
Casualty Loss	--PHA submits data sufficient to reflect the change in PHA inventory as a result of the damaged units on-line via PIC (Any replacement units due to casualty loss will be assigned a new Development Number)

Detail Matrix

This detail matrix reflects the submission requirements for each type of removal application. The PIC edit checks are arranged to expect data in the section noted for each type of proposed inventory removal application. When in doubt, refer to the instructions for each section, attach explanations, or contact SAC management.

KEY: **S**—Data is automatically generated by PIC. **Y**—Data is required in application **N**—Data is not required in application **P**—Data is possibly required, depending on the circumstances. See the detailed instructions for more information.

Form Section	Form Item	Eminent Domain	Demolition	Demolition & Disposition	Disposition	HOPE VI Demolition	De Minimis Demolition	Homeownership	Required or Voluntary Conversion	Casualty Loss	Disposition 24 CFR 941 (Subpart F)
Section 1: General Information	All Items	S	S	S		S	S	S	S	S	S
Section 2: Long-Term Impact	All Items	Y	Y	Y		Y	Y	Y	Y	Y	Y
Section 3: PHA Board Resolution, Environmental Review, and Gov't Consultation											
Resolution Number	1	N	Y	Y	Y	N	Y	Y	Y	N	N
Date of Resolution	2	N	Y	Y	Y	N	Y	Y	Y	N	N
Name of Responsible Entity conducting Environmental Review	3	N	Y	Y	Y	N	Y	Y	Y	N	Y
Jurisdictions covered by PHA	4	N	Y	Y	Y	N	N	Y	Y	N	N
Appropriate Government Official Letter of Support	5	N	Y	Y	Y	N	N	N	Y	N	N
Section 4: Description of Existing Development											
	1-9 & 11	S	S	S	S	S	S	S	S	S	S
	10.	Y	Y	Y	Y	Y	N	Y	P	N	Y
Section 5: Description of Proposed Action, Method of Sale, Value, and Net Proceeds											
Type of action proposed	1	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Proposed action by unit type	2	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Proposed action by building type	3	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Acres included	4	Y	N	Y	Y	N	N	Y	Y	N	Y
Site Map	5	P	P	P	P	N	N	P	Y	N	N
Partial Removal Identification	6	P	P	P	P	P	N	Y	Y	P	P
Method of Sale	7	N	N	Y	Y	N	N	Y	P	N	Y
Value	8	P	N	Y	Y	N	N	Y	P	N	N
Appraisal	9	P	N	Y	Y	N	N	P	P	N	N
Calculation of Net Proceeds	10	N	N	Y	Y	N	N	Y	P	N	Y
Use of Net Proceeds	11	N	N	Y	Y	N	N	Y	P	N	Y
Demolition Costs	12(a)	N	Y	Y	N	Y	N	N	P	N	N
Source of Funding for Demolition Costs	12(b)	N	Y	Y	N	N	N	N	P	N	N
Timetable	13	N	Y	Y	Y	Y	N	Y	Y	N	Y
Section 6: Relocation											
Unit Occupancy	1	Y	Y	Y	Y	Y	N	P	Y	N	N
Individuals affected	2	Y	Y	Y	Y	Y	N	P	Y	N	N
Counseling and Advisory Services	3	P	Y	Y	Y	N	N	P	Y	N	N
Relocation Housing	4	P	Y	Y	Y	N	N	P	Y	N	N
Cost of Counseling and Advisory Services	5	P	Y	Y	Y	N	N	P	Y	N	N
Moving Costs	6	P	Y	Y	Y	N	N	P	Y	N	N
Total Relocation Costs	7	P	Y	Y	Y	N	N	P	Y	N	N
Source of Funding for Relocation Costs	8	P	Y	Y	Y	N	N	P	Y	N	N
Section 7: Resident Consultation											
Consultation with residents at Development	1	P	Y	Y	Y	N	N	P	Y	N	N
Consultation with PHA-wide resident organiz.	2	P	Y	Y	Y	N	N	P	P	N	N
Consultation with RAB	3	P	Y	Y	Y	N	N	P	P	N	N
Written Comments	4	N	Y	Y	Y	N	N	P	P	N	N
Section 8: Offer of Sale											
Exercise of Exception?	1	N	N	Y	Y	N	N	N	P	N	N
Specific Exception Exercised	2	N	N	Y	Y	N	N	N	P	N	N
Established Eligible Organizations	3	N	N	Y	Y	N	N	N	P	N	N
Written Notification of Sale	4	N	N	Y	Y	N	N	N	P	N	N
Expression of Interest	5	N	N	Y	Y	N	N	N	P	N	N
Proposal to Purchase	6	N	N	Y	Y	N	N	N	P	N	N
Acceptance/Rejection of Proposal	7	N	N	Y	Y	N	N	N	P	N	N
Section 9: Certification (for specific removal)		Y	Y	Y	Y	N	Y	Y	Y	N	Y

***Dispositions—24 CFR 941(Subpart F)**

Pursuant to 24 CFR 970.3(12), dispositions requests by PHAs to allow for a 24 CFR 941 (Subpart F) Mixed Finance Development are not subject to 24 CFR 970. However, these dispositions are still subject to Section 18 of the Act. The SAC will review and approve these requests using a "streamlined" processing method (see the Detailed Matrix for submission requirements). The SAC's review and approval will occur separately from HUD's Mixed-Finance application process and must occur prior to the closing on the Mixed-Finance Development.

A PHA should apply for this kind of disposition ONLY if it has submitted, or is in the process of submitting, an application for a Subpart F Mixed-Finance Development (i.e. Term Sheet, evidentiary material) to HUD's Office of Public Housing Investments (PHI). The SAC's approval of the disposition will be conditioned on HUD's approval of the Mixed-Finance application documents and the SAC will not authorize the PHA to enter into any formal disposition action until such approval.

Section 1: General Information
Item 1: Name of PHA: Generated by PIC from PHA Module. If the full PHA name is not provided, please provide.
Item 2: Date of Application: Generated by PIC and should be the dated the application was mailed (post-marked).
Item 3**:** Address of PHA: Generated by PIC from PHA Module. Provide a mailing address, other than a P.O. Box, for express mail delivery.
Item

Section 2: Long-Term Impact of Proposed Action
The PHA should acknowledge that HUD considers all requests for inventory removal submitted through this application to be formal requests of the PHA to remove those affected dwelling units from the PHA's inventory and Annual Contributions Contract (ACC). Thus, the PHA should acknowledge that the proposed inventory removal action may result in a direct reduction in operating subsidy and CFP for the PHA. (In some cases, these reductions will be phased in over a period of time and the PHA should consult the applicable HUD Regulations for specific information on reductions of federal funding). The purpose of requiring PHA's to provide an estimate of the possible reduction of federal funding in this Section is to show that the PHA has performed the analysis and is award that a reduction in federal funds may occur. The PHA should also acknowledge that HUD's approval of an inventory removal action does not guarantee or imply HUD approval of any PHA request for additional federal funding and the PHA must make such application for other funding under the applicable funding application. Accordingly, prior to submitting this application for inventory removal, the PHA's Board and staff should determine that this proposed inventory removal action is in the best interest of the affected residents, the PHA, and the community. The PHA should specifically determine: (1) the actual cost of operating the units proposed for removal; (2) the percentage of the PHA's operating subsidy and CFP that is dependent on the units proposed for removal; (3) that no other solution is feasible (e.g. a new marketing strategy). PHAs applying for Required or Voluntary Conversion may apply for tenant-based assistance in accordance with Housing Choice Voucher assistance program requirements, and HUD may give the PHA a priority for receiving tenant-based assistance to replace the public housing units (depending on processing requirements).

Section 3: PHA Board Resolution, Environmental Review, and Government Consultation
Item 1: The PHA Board Resolution must evidence the Board's support for and approval of this Application and the proposed inventory removal action. For homeownership and conversion, the Resolution should also approve the applicable Homeownership or Conversion Plan. Provide the date of the Resolution, if the PHA numbers its resolutions. The resolution must be signed and dated after all resident and local government consultation has been completed;
Item 2: The PHA Board Resolution should be dated after the date of the last resident meeting and after the date of all Letters of Support from Appropriate Government Officials to show that the PHA Board is aware of all resident and local government comments concerning this proposed inventory removal action.
Item 3: An environmental review is required for all proposed inventory removal actions involving demolition (including the De Minimis exception to demolition), disposition (including dispositions by eminent domain), and conversion. A PHA may submit an application for inventory removal prior to the completion of the required environmental review, but the SAC will not approve the proposed action without evidence that the environmental review has been completed to HUD's satisfaction. The HUD Field Office with jurisdiction over the PHA submitting the application is responsible for approving the completed environmental review. An environmental review will generally be completed by a responsible entity as defined in 24 CFR 58.2, but the HUD Director of Public Housing at the HUD Field Office with jurisdiction over the PHA must then approve the Request for Release of Funds (RROF) and Authority to Use Grant Funds (HUD-7015.16) in order to satisfy this requirement for a completed environmental review. In certain circumstances, HUD may perform the

environmental review itself under the provisions of 24 CFR 50. If this is the case for this proposed action, check the appropriate box. For proposed eminent domain actions, HUD will do the environmental review under 24 CFR 50.
Item 4: For Section 18 Demolition and Disposition actions, The PHA must provide evidence that the proposed inventory removal action was developed in consultation with all Appropriate Government Officials (AGOs) with jurisdiction where the affected Development(s) is located. If the PHA covers multiple jurisdictions (such as a regional housing authority), the PHA must contact the AGO for each jurisdiction. The AGO is generally the elected Chief Executive Officer (CEO) or other legally designated official of that local government who is primarily responsible for the conduct of that entity's governmental affairs. Examples of AGOs include the elected mayor of a municipality, the elected county executive of a county, or the chairperson of a count commission or board that has no elected county executive. The PHA's narrative description of its consultation process with all AGOs must include the following: (1) the date(s) the PHA consulted the AGOs; (2) a summary of the meetings between the PHA and the AGOs; (3) a summary of the issues raised by the AGOs; and (4) the PHA's responses to the issues raised by the AGOs. If AGOs consistently failed to respond to the PHA's attempt at consultation, the PHA's narrative must describe its attempts at consultation and documentation of those attempts (i.e. letters, requests for meetings, public notices, etc.) should be attached. For proposed Required and Voluntary Conversions, the PHA must provide evidence that it has consulted with AGOs in developing the Conversion Plan. The PHA may satisfy the requirement for consultation with AGOs by obtaining a certification from the AGO(s) that the Conversion Plan is consistent with the applicable Consolidated Plan. The Conversion Plan must specifically address any proposed demolition or disposition. This may be the same certification as is required for the PHA Plan that includes the Conversion Plan, so long as the certification specifically addresses the Conversion Plan.
Item 5: For proposed Section 18 Demolition and Disposition actions, the PHA must obtain a signed and dated letter(s) in support of this inventory removal application from all AGOs. Letters of Support from AGOs should demonstrate that the PHA has consulted with the AGO.

Sections 4-9 must be completed and submitted separately for each Development covered by this Application
Section 4: Description of Development
The PHA must provide a description of the number of buildings (residential and non-residential), units and total acres for the entire Development as it currently exists. This is essential baseline information for the SAC. Although an application may contain multiple Developments, compliance with the applicable HUD Regulations must be determined on a Development-by-Development basis. Subsequent HUD approval and tracking is also performed at the Development level.
For applications entered on-line via PIC, the PHA is only required to enter information at items 8, 10, and 11. All other items will be automatically generated from PIC. However, please make corrections to any of the automatically generated information.
Item 2: Development Number: This number should be the HUD Development Number. All Development Numbers are at least 8 characters long (and may be up to 11 characters for older Developments). Please verify that PIC has generated the correct Development Number. If PIC has not generated the correct Development Number, please make the necessary changes in the appropriate PIC module or attach an explanation to this Application for SAC review.
Item 3: Date of Full Availability (DOFA)
Item 6: Date of construction: applies to those Developments that were acquired by the PHA as part of the development process and reconstructed at the time of development. Therefore, for these acquired developments, the DOFA date is not the true indicator of the age of the Development.
Item 10: Total Acres of Development: Provide the legal description and/or survey for the Development and provide the total number of acres that currently comprise the Development. PIC recognizes an exact acreage number, up to two decimal places (e.g. 1234.56)

Section 5: Description of Proposed Action by Development, Method of Sale, Value, and Net Proceeds
Item 1: Type of Proposed Action: For proposed actions that include both a Demolition and/or Disposition action and a conversion action, a PHA may request HUD approval of both actions by submitting one HUD-52860 application. However, the PHA must complete the application sections (including all attachments and addendums) for both actions. HUD may approve demolition as part of the conversion application, but will not approve a disposition unless it meets all the requirements of Section 18.
Items 2&3: The PHA should identify residential and non-residential buildings and/or land proposed for removal by this proposed action. For on-line applications entered in PIC, the units of the data is automatically taken from the description of the Development inserted in other sections of this application. If the address information for residential buildings was never entered into PIC, please identify the number of buildings.
Item 4: Acres included in proposed removal action: Complete for any action that includes a disposition. PIC recognizes an exact acreage number, up to two decimal places (e.g. 1234.56)
Item 5: A site map is required for all proposed inventory removal actions that involve less than the entire Development (e.g. partial removals, a portion of a campus development, etc.). However, a site map is not required if the partial removal

is part of a scattered site development. On each required site map, the buildings and/or dwelling units proposed for removal must be clearly identified. Attach a site map for each Development included in this application.
Item 6: In this attachment, for all partial removal requests, the PHA must clearly explain its rationale for selecting the particular units, buildings, or land proposed for removal. For example, in the case of demolition of a section of a Development, the PHA must explain why it is proposing to demolish this section rather than another section. For applications that are not submitted on-line using PIC, this attachment must also include the address list, building number(s), and/or name of each building or other property to be removed. Note that once HUD approves a partial removal as identified in this application, a PHA cannot independently change the units for removal without HUD consent.
Item 7: If the PHA has checked "B" and is proposing a sale at less than Fair Market Value (FMV), it must attach a narrative describing the negotiated sale and provide a justification for why it benefits the PHA and the residents of the affected Development. This narrative must specifically describe the anticipated benefits (e.g. Housing Choice Voucher assistance, Low Rent Public Housing (LRPH), etc.) to the residents of the affected Development, as well as to the individuals on the PHA's waiting list. Note that any HUD-approval of a disposition of PHA property that is both (a) negotiated and (b) at less than FMV will require PHA to include a reversion clause stipulating that the property will revert to the PHA (or the ground lease shall terminate) if the purposes for which HUD approved the disposition are not met for the required term. The SAC encourages PHAs to submit their preferred deed restriction/reverter language as part of this application. However, all proposed language is subject to HUD approval. If the PHA has checked "C" and is proposing a disposition which includes an exchange of property, it must attach a narrative describing each parcel of property (PHA property and property it will receive after exchange takes place) and provide a justification for why the exchange benefits the PHA, the residents of the affected Development, and the individuals on the PHA's waiting list.
Item 9: If the PHA property is being sold at FMV, the estimated sales price must be based on an appraisal by an appraiser licensed or certified in the state in which the PHA property is located. In connection with the appraisal, the PHA should submit the following documentation: (1) the "Executive Summary" of the appraisal; and (2) the appraiser's determination of the "highest and best use" value of the property. If the PHA property is being sold as part of a negotiated deal for less than FMV, a full appraisal is not necessary. However, in lieu of the appraisal, the PHA must submit a Tax Assessor's Opinion as to the value of the property
Item 10: For disposition, gross proceeds will generally be the sales price/compensation for the PHA property. For homeownership, gross proceeds include all payments made by homebuyers for credit to the purchase price (including, without limitation, earnest money, down payments, payments out of the proceeds of mortgage loans, payments made under a lease-purchase arrangement, and principal and interest payments under purchase-money mortgages), together with any amounts payable upon resale under HUD Regulations, and interest earned on all such receipts.
Item 11: A PHA may realize Net Proceeds from the disposition of PHA property or from homeownership sales.

Net Proceeds--Section 18 disposition or disposition as part of a Required or Voluntary Conversion: For Section 18 dispositions, with HUD approval, PHAs are permitted to use gross proceeds to pay the reasonable costs of the disposition, including costs associated with relocation of displaced residents and remediation costs. Pursuant to Section 18(a)(5)(A) and unless waived by HUD (24 CFR 970.9(b) and 5.110), PHAs must use any remaining net proceeds to retire outstanding debt used to finance the original development. The SAC automatically assumes that PHAs wish to request a waiver to repay outstanding obligations issued to finance the original development and will begin the process of obtaining any necessary waivers from HUD's Assistant Secretary of Public and Indian Housing (PIH) upon receipt of a disposition application from a PHA).

If any net proceeds remain after the disposition costs and debt (if applicable) have been paid, with written HUD-approval, the PHA may use net proceeds for any eligible purpose listed under Section 18(a)(5) of the Act, which provides that proceeds may be used for: (i) the provision of low-income housing or to benefit the residents of the PHA; or (ii) leveraging amounts for securing commercial enterprises, on-site in public housing projects of the PHA, that are appropriate to serve the needs of the residents. The Act defines low-income housing as decent, safe, and sanitary dwellings assisted under the Act. Accordingly, the provision of low-income housing under Section 18(a)(5) of the Act is limited to public housing units under an ACC or housing assisted by the Housing Choice Voucher Program. However, housing that the PHA considers "affordable" and intended for low-income individuals earning 80% or lower of AMI, but that is neither public housing under an ACC nor housing assisted by Housing Choice Vouchers does not qualify as low-income housing under the Act and is therefore not a permitted use of net proceeds.

PHAs anticipating net proceeds from a disposition should include a narrative description of how they intend to use the net proceeds in their disposition applications. The SAC will review the use specified by the PHA and, if it complies with the Act, approve the use. If a PHA is proposing to use net proceeds for the acquisition or development of new ACC units, it should indicate the approximate number of units it plans to develop. If a PHA is proposing to rehabilitate existing ACC-units in its inventory, it should include the Development number(s) of those units, the number of units to be rehabilitated, a budget, and a statement of work. If the PHA is proposing to provide social services or other benefits to its residents, the

PHA should include information on the number of families it will service and what services it will provide. If a PHA intends to use net proceeds at a specific Development or to fund the PHA's Central Office Cost Center (COCC), the PHA must do this in accordance with the spending and financial reporting requirements under 24 CFR Part 990.

Once HUD approves a disposition application and the PHA's stated intended use for net proceeds, the PHA cannot change its use of those proceeds without the prior written consent of HUD. PHAs are also advised that pursuant to 24 CFR 970.35, they must report the use of net proceeds to their HUD Field Office by providing a financial statement showing how the funds were expended by item and dollar amount.

Net Proceeds—homeownership: A PHA may use Net Proceeds resulting from homeownership sales in accordance with its PHA Plan so long as those proceeds are used for low-income housing purposes as defined by the Act. Acceptable uses for proceeds include: (1) rehabilitation of existing low-income ACC units; (2) the building and/or acquiring of low-income units (ACC units); or (3) funding its HUD-approved homeownership program.
Item 12 (a) and (b): Indicate the source of funds (e.g. CFP) that the PHA will use to carry out the demolition and provide an estimate of the amount of funds that will be necessary.
Item 13: Complete this general timetable. PHAs are also advised that pursuant to 24 CFR 970.35, they must comply with the following record and reporting requirements: (1) provide HUD (by entering the information in PIC) with the actual completion of each demolition contract within a week of making the final payment to the demolition contractor or expending the last remaining funds if funded by force account and (2) provide HUD (by entering the information in PIC) with the execution of sale or lease contract within a week of execution.

Section 6: Relocation
Item 1(a) and (b): Complete for all proposed inventory removal actions. For removal actions involving the entire development, 1(b) should result in 0 (zero) remaining units. For partial removal actions, at 1(b), identify the number of units that will remain at the Development.
Item 2**:** Identify the total number of individual residents including children that will be affected by this proposed action. This information should be current as of the day of the application. If the units proposed for removal are vacant, the PHA must attach a detailed narrative that clearly explains the circumstances that resulted in the units become vacant. The narrative must also provide detailed information concerning the relocation process of the residents from the affected Development, including: (1) when the residents were relocated (e.g. include a month-to-month breakdown, if available, or if not available, provide the date relocation commenced and the date the relocation ended; (2) where the residents were relocated (e.g. other PHA property, private rental market with Housing Choice Vouchers, etc.); (3) the resources the PHA used in accomplishing the relocation; and (4) evidence that the residents have been actually relocated.

Relocation Requirements:
For all Section 18 disposition and/or demolitions except for dispositions to allow for mixed-finance housing developments under 24 CFR 941 Subpart F, the PHA must comply with the relocation requirements set forth at 24 CFR 970.21. The PHA should create and implement a Relocation Plan that includes the following information: (1) the number of individual residents that will be displaced by the proposed action (2) the type of counseling and advisory services, and other housing resources, that the PHA plans to provide to displaced residents (3) the comparable housing—that meets Housing Quality Standards (HQS) and is located in an area that is generally not less desirable than the location of the displaced resident's housing—that will be offered to displaced residents (e.g. other public housing at comparable rents, housing with project-based assistance, Housing Choice Voucher assistance, etc.), (4) an estimate of the costs for counseling and advisory services and resident moving expenses and the expected source for payment of those costs (e.g. operating subsidy, CFP, etc.), (5) a schedule for the relocation of displaced residents on a month-to-month basis. Note that as a general rule, the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (URA) shall not apply to Section 18 inventory removal actions approved by HUD through this application. However, the URA may apply in certain instances if triggered (e.g. by the use HOME, CDBG, or other funds). For additional guidance on creating a Relocation Plan that complies with Sections 18, 22, 33, and 32 of the Act, see Chapter 8-11 of HUD Handbook 1378 (available at www.hudclips.org).

Item 8: Identify the source(s) of funds (e.g. CFP) that the PHA will use to fund the relocation of residents and the estimated amount of the funds that are needed to accomplish the relocation. Note that a PHA may not use funds that it has applied for under a HUD Notice of Funding Availability (NOFA) if it has not yet been awarded these funds. PHAs should are also advised that pursuant to 24 CFR 970.35, they must provide HUD with the amounts expended for relocation expenses by providing HUD with a financial statement showing this information for each property sold.

Section 7: Resident Consultation

Item 1: This Section must be completed for all proposed inventory removal actions except for units demolished though the De Minimis Exception. For Required and Voluntary Conversions, the PHA must provide evidence, that in addition to fulfilling the public participation requirements for the PHA Plan, the PHA: (1) held at least one public meeting with the residents of the affected Development (including the duly elected Resident Council, if any, that covers the affected Development) at which the PHA: (i) explained the requirements of the applicable sections of Act and HUD Regulations governing conversion, especially as they apply to the residents of the affected Development; and (ii) provided draft copies of the Conversion Assessment and Conversion Plan to the residents; and (2) provided a reasonable comment period for residents to respond to the draft Assessment and Plan. Include in this narrative a summary of the resident comments (or if none, specifically state none) received when developing the Conversion Plan, and the PHA's responses to the significant issues raised by the residents' comments (including a description of any actions taken by the PHA as a result of the comments). For Homeownership, the PHA must provide a description of the input of the residents at the affected Development that was obtained during the resident consultation process required by the PHA Plan. If the PHA's PHA Plan does not require information regarding homeownership under 24 CFR 903, the PHA must provide evidence that it has consulted with the Resident Advisory Board(s) regarding its Homeownership Plan and provide the description of any comments it receives.

Items 2-5: These sections must be completed for any proposed demolition and/or disposition actions under Section 18 of the Act. For these actions, in addition to consulting with the residents at the affected Development, the PHA must consult with the Resident Council at the affected Development, the Resident Council representing the interests of the residents under the jurisdiction of the entire PHA, and the Resident Advisory Board (RAB). Although neither the Act nor the HUD Regulations require a specific method of consultation, the PHA must provide evidence that this application was developed in consultation with the residents and the resident groups representing them. The PHA's narratives should indicate that, in its consultations, the PHA informed the residents (and the resident groups) that written comments could be submitted about the proposed action. Note that the requirements for Resident Consultation are broader than the requirements for the Offer of Sale in that the PHA must consult resident groups beyond those at the affected Development.

Section 8: Offer of Sale

(The Offer of Sale requirement is often referred to as the 412 requirement because it was originally established by Section 412 of the Cranston-Gonzalez National Affordable Housing Act of 1990). The Offer of Sale requirement applies to all proposed Section 18 Demolition/Disposition and Disposition actions.

Item 1: The PHA should carefully review the exceptions to determine if any of the exceptions are applicable and must provide sufficient documentation evidencing that it is authorized to claim the exception.

Item 2: If the PHA is not exercising an exception to the Offer to Sale requirement, it must send an initial written notification of the proposed sale of the Development to all "Established Eligible Organizations". Established Eligible Organizations include: (1) Resident Councils at the affected Development; (2) Resident Management Corporations at the affected Development; and (3) outside organizations that have partnered with the Resident Council and are acting on behalf of the residents (as defined at 24 CFR 964). The content of the initial written notification must, at a minimum, include the eight (8) requirements specified at 24 CFR 970.11(d). The PHA should attach a signed and dated copy of each initial notification letter that it sent. Each Established Eligible Organization has up to 30 days to respond to the PHA's initial written notification by submitting an initial expression of interest to purchase the Development (as defined by 24 CFR 970.11(b)) to the PHA.

Item 3: If the PHA has received any written initial expression of interest within 30 days of sending the initial notification of proposed sale, the PHA must provide that the organization submitting that expression of interest with all necessary terms and information to prepare and submit a proposal to purchase the affected Development. The organization then has 60 days from that date that information is provided to them to prepare and submit a proposal to purchase the Development. If the PHA receives a proposal and accepts it, the PHA must submit revisions to this application to reflect the sale arrangement with the organization. If the PHA receives a proposal and rejects it, the organization may appeal the decision to HUD. HUD will not approve or disprove this application until the appeal is resolved or the 30 day appear period has passed.

Section 9: Certification

The Executive Director, Board Chairperson, or other authorized agent of the PHA, should sign and date this Certification and submit it (as a scanned PDF file) as part of its on-line Application.

PHA Certification of Compliance
Section 18 Demolition/Disposition

Acting on behalf of the Board of Commissioners of the _____ (PHA), as its Chairman, Executive Director, or other authorized PHA official, I approve the submission of this Inventory Removal Application (HUD-52860) dated _____ and known as DDA # _____, hereinafter referred to as the "Application", of which this document is a part, and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of this Application and the implementation thereof:

1) All information contained in the Application (including all attachments and Addendums) is true and correct as of the date of this Application;
2) The proposed removal action does not violate any remedial civil rights orders or agreements, compliance agreements, final judgments, consent decrees, settlement agreements, or other court orders or agreements to which this PHA is a party;
3) The PHA certifies that it will carry out the proposed removal action in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990 and will affirmatively further fair housing in carrying out the proposed removal action;
4) If this proposed removal action involves a disposition and the PHA did not claim an exemption to the Offer of Sale requirement, this PHA sent all required initial written notifications (as described at 24 CFR 970.11) of the proposed sale of the Development to all Established Eligible Organization and the PHA certifies that either it did not receive a response from any notified organization within a 30-day time frame or each notified Established Eligible Organization waived its opportunity to purchase the Development or otherwise rejected the Offer of Sale. The PHA further certifies that it maintains documentation of all documents required by 24 CFR 970.11 on file at its primary business office;
5) If an appraisal was submitted at Section 5, the PHA verified that the appraiser was licensed/certified in the state in which the PHA property and received a certification from the appraiser that the appraisal was conducted using generally accepted appraisal methods and maintains this written documentation on file at its central office;
6) All dwelling units at the affected development are vacant and have been approved by HUD for demolition, OR, if any dwelling units at the affected development are occupied:
   - The PHA created a Relocation Plan in compliance with all applicable federal, state, and local laws (to the extent those requirements apply), including, without limitation, the Act, 24 CFR 970.21, and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) and its implementing regulations at 49 CFR Part 24, and maintains a written copy of the Relocation Plan on file at the central office;
   - The PHA will notify each family residing in a unit affected by this proposed removal action at least 90 days prior to the displacement date, except in cases of imminent threat to health and safety and such notice;
   - The PHA will provide for all actual and reasonable relocation expenses of each resident displaced by this proposed removal action, including residents requiring reasonable accommodation because of disabilities;
   - The PHA will offer any necessary counseling for residents displaced by this proposed removal action;
   - The PHA will not commence the demolition or complete the disposition of any occupied building until all residents residing in the units affect by this proposed removal action are actually relocated;
   - The PHA will provide each family affected by this proposed removal action with comparable housing that meets Housing Quality Standards (HQS) and that is located in an area that is generally not less desirable that the location of the displaced person's housing. This comparable housing may include: (a) actual relocation into the private rental market with Housing Choice Voucher assistance; (b) actual relocation into housing with project-based assistance; or (c) other PHA properties;
7) The PHA described the proposed removal action in its PHA Annual Plan and timetable under 24 CFR Part 903 (except in the case of small or high-performing PHAs eligible for streamlined annual plan treatment), and the description in the PHA Annual Plan is identical to the removal action proposed in this Application and otherwise complies with the Act;
8) The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or 24 CFR Part 50;
9) All attachments and supporting documentation referenced in the Application have been and will continue to be available at all times in the PHA's primary business office:
10) The PHA will comply with all reporting and recordkeeping requirements of HUD (including the requirements set forth at 24 CFR 970.35) and shall make all required reports to the applicable HUD Field Office. The PHA acknowledges that reporting

and recordkeeping requirements are ongoing and certifies that it will comply with all applicable reporting requirements after it receives any approvals to this action from the SAC;

11) The PHA certifies that the proposed removal action complies with all applicable Federal statutory and regulatory requirements;
12) The PHA will not take any action to commence the proposed removal action, including without limitation the expenditure of HUD funds, until it receives written approval of this proposed action from HUD.
13) The PHA certifies that the reason(s) for this proposed removal action is as described in Exhibit A, attached to and made a part of this Certification.

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
Signature	Date

EXHIBIT A: Reason for Removal

PHA Certification of Compliance
Section 18 Demolition/Disposition

The PHA Certifies that its reason for applying to demolish and/or dispose of the Development and/or PHA Property (or a part thereof) is as indicated below.
Check all applicable boxes.

Demolition:

The demolition of the Development (or portion of the Development) is in the best interest of the residents and this PHA because:

Must be Checked for Full or Partial Demolition

Obsolescence—24 CFR 970.15(a)(1)*:* The Development (or affected portion of the Development) is obsolete as to physical condition, location or other factors (as defined by 24 CFR 970.15), making it unsuitable for housing purposes and no reasonable program of modification or rehabilitation of the Development is cost-effective to return the Development (or portion of the Development proposed for demolition) to its useful life;

Attach a narrative or documentation (e.g. architect's report, feasibility study, etc.) to justify obsolescence and attach a completed Total Development Cost (TDC) Calculation" (HUD-52860-B and reference them as Section 18 Certification)

Must be Checked for Partial Demolition Only

Viability--24 CFR 970.15(a)(2) and 24 CFR 970.15(c): the partial demolition will help to ensure the viability of the remaining portion of the Development by reducing the density of the Development to permit better access to emergency or rescue services, or by improving marketability of the Development by reducing the density of the Development to that of the neighborhood in which the Development is located or to other developments in the PHA's inventory;

Attach a narrative or documentation to justify how density reduction will result from the partial demolition and reference it as Section 18 Certification.

Disposition:

The retention of the Development (or a portion thereof) and/or the PHA property is not in the best interests of the residents or the PHA because:

Change in Neighborhood—24 CFR 970.17(a): Conditions in the area surrounding the Development (density, or industrial or commercial development) adversely affect the health or safety of the residents or the feasible operation of the Development by the PHA;

Replacement Housing—24 CFR 970.17(b): The disposition allows the acquisition, development, or rehabilitation of other properties or developments that will be more efficiently or effectively operated as low-income housing developments;

Other—24 CFR 970.17(c): The PHA has otherwise determined that the disposition is appropriate for reasons that are consistent with its goals of the PHA and its PHA Plan and that are otherwise consistent with the Act;

Vacant Land and Non-dwelling Facilities (Excess)—24 CFR 970.17(d)(1) The disposition of vacant land or non-dwelling structures exceed the needs of the Development (after Date of Full Availability--DOFA)

Vacant Land and Non-dwelling Facilities (Incidental)—24 CFR 970.17(d)(2)): The disposition of vacant land or non-dwelling structures is incidental to, or does not interfere with, the continued operation of the remaining portion of the Development;

Attach a narrative or documentation to justify the PHA's specific reason for disposition checked above and reference it as Section 18 Certification.

Instructions for completing EXHIBIT A of the PHA Certification of Compliance

Section 18 Demolition/Disposition

Demolition: All applications for demolition (all or a portion of a development) must meet the obsolescence test. In addition, applications to demolish a portion of a development must also meet the Partial Demolition test. PHAs should attach a narrative and/or documentation to evidence that they have met the applicable tests.

Obsolescence: HUD will approve an application for demolition (full or partial) only if the PHA certifies that the Development (or portion of the Development) is "obsolescent" as defined by 24 CFR 970.15. HUD considers the following to be major problems indicative of obsolescence: (i) as to physical condition: structural deficiencies that cannot be corrected in a cost-effective manner (settlement of earth below the building caused by inadequate structural fills, faulty structural design, or settlement of floors), or other design or site problems (severe erosion or flooding); (ii) as to location: physical deterioration of the neighborhood; change from residential to industrial or commercial development; or environmental conditions as determined by HUD environmental review in accord with 24 CFR part 50, which jeopardize the suitability of the site or a portion of the site and its housing structures for residential use; or (iii) other factors that have seriously affected the marketability, usefulness, or management of the property. Note that the PHAs must justify obsolescence by not only certifying under this section (and including the required attachment), but also by completing and submitting the HUD-52860-B to prove to HUD that repair costs are prohibitive and rehabilitation is not reasonable.
Partial Demolition: In addition to meeting the obsolescence criteria above for the affected portion of the Development, the PHA must demonstrate that the partial demolition will help to ensure the viability of the remaining portion of the Development. A comparison to the neighborhood, or the rest of the PHA's housing stock could be one way of showing the Development is too dense.

Disposition: Select a justification for Disposition and then attach a narrative and/or documentation to evidence the justification.

Replacement Housing: A PHA should select the "Replacement Housing" reason for disposition only if it can provide evidence to HUD that the disposition will provide for more efficient or effective low-income replacement housing. For instance, this reason could be used if a PHA owns property that has highly appreciated in value and the PHA can show that by selling the property, it could develop or acquire twice the number of units for low-income residents at a location that is as good or better for residents than the original location. Also, if a PHA selects "Replacement Housing", pursuant to 24 CFR 970.19(f), the PHA must demonstrate to the satisfaction of HUD that the replacement units are being provided "in connection" with the disposition of property. This usually requires that the PHA receive Fair Market Value (FMV) for the disposition of the property and use all of net proceeds from that disposition to provide the replacement units, including relocation assistance to residents of occupied units that will be lost to the public housing inventory. The PHA may also use other sources of funding to provide for the replacement housing. The replacement housing does not need to be public housing units or under the ACC, but they must serve low-income families (those with incomes at 80% or less of Area Median Income (AMI)).

Other: A PHA may select the "Other" reason for disposition for any reason not specifically provided in 24 CFR 970.17 so long as it can provide evidence to HUD that the disposition is consistent with the goals of the PHA, the PHA Plan and Section 18 of the Act. A PHA should not submit an application for disposition under "Other" unless it has discussed the proposed disposition in its PHA Plan Some of the reasons for which a PHA may select "Other" include: (1) a PHA seeks to dispose of the property in order to use all available resources to redevelop a housing development (that serves low-income residents) on the property by leveraging tax credits, bonds, or grants (e.g. Mixed Finance); (2) the PHA can demonstrate the rents and subsidy do not cover the operating expenses at the development, or there is no longer a need for housing in the area (however, if the PHA wants to compare long-term operating costs to Tenant-Based Housing Choice assistance, it must apply under the Voluntary Conversion Rule found in 24 CFR 972); (3) the PHA has an HUD-approved Moving to Work (MTW) Homeownership Plan and the disposition is pursuant to that Plan; 4) a PHA seeks to dispose of a development that is obsolete as to physical condition, location or other factors (as defined by 24 CFR 970.15), making it unsuitable for housing purposes and no reasonable program of modification or rehabilitation of the Development is cost-effective to return the development (or portion of the development proposed for demolition) to its useful life. If a PHA is seeking the disposition due to the obsolescence of the development, it should attach the "Total Development Cost (TDC) Calculation" (HUD-52860-B) as part of its evidence to prove to HUD that repair costs are prohibitive and rehabilitation is not reasonable.

PHA Certification of Compliance
Section 18 Disposition
24 CFR 941 Subpart F

Acting on behalf of the Board of Commissioners of the _____ (PHA), as its Chairman, Executive Director, or other authorized PHA official, I approve the submission of this Inventory Removal Application (HUD-52860) dated _____ and known as DDA # _____, hereinafter referred to as the "Application", of which this document is a part, and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of this Application and the implementation thereof:

1) All information contained in the Application (including all attachments and Addendums) is true and correct as of the date of this Application;
2) The proposed disposition does not violate any remedial civil rights orders or agreements, compliance agreements, final judgments, consent decrees, settlement agreements, or other court orders or agreements to which this PHA is a party;
3) The PHA certifies that it will carry out the proposed disposition in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990 and will affirmatively further fair housing in carrying out the proposed removal action;
4) The PHA has submitted or will submit a mixed-finance proposal (term sheet) to HUD for a housing project which will developed with mixed financing pursuant to 24 CFR 941 Subpart F;
5) The Board of the PHA has specifically authorized the proposed disposition in a Board Resolution and maintains a copy of that Resolution on file at its primary business office;
6) All dwelling units at the affected development are vacant and have been approved by HUD for demolition, OR, if any dwelling units at the affected development are occupied:
    - The PHA created a Relocation Plan in compliance with all applicable federal, state, and local laws (to the extent they apply) including, without limitation, Section 18 of the Act, and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) and its implementing regulations at 49 CFR Part 24, and maintains a written copy of the Relocation Plan on file at the central office;
    - The PHA will notify each family residing in a unit affected by this proposed disposition at least 90 days prior to the displacement date, except in cases of imminent threat to health and safety and such notice;
    - The PHA will provide for all actual and reasonable relocation expenses of each resident displaced by this proposed disposition, including residents requiring reasonable accommodation because of disabilities;
    - The PHA will provide any necessary counseling for residents displaced by this proposed disposition;
    - The PHA will not commence the demolition or complete the disposition of any occupied building until all residents residing in the units affect by this proposed disposition are actually relocated;
    - The PHA will offer each family affected by this proposed disposition with comparable housing that meets Housing Quality Standards (HQS) and that is located in an area that is generally not less desirable that the location of the displaced person's housing. This comparable housing may include: (a) actual relocation into the private rental market with Housing Choice Voucher assistance; (b) actual relocation into housing with project-based assistance; or other PHA properties;
7) The proposed disposition of the PHA Property was developed in consultation with the residents of the affected development by this disposition and each resident council, if any, of the building(s) proposed for disposition, and the resident advisory board of the PHA affected by this disposition and the PHA maintains this documentation on file at its primary business office;
8) The proposed disposition was developed in consultation with all appropriate local government officials, and the PHA maintains written evidence of this consultation on file in its central office;
9) If the PHA is not realizing net proceeds from the proposed disposition, but it realizes net proceeds from the disposition in the future, the PHA will contact the SAC immediately so that the SAC may request that HUD waive the PHA's requirement to repay outstanding bond debt, if any, that exists on the PHA Property proposed for disposition;

10) Because the proposed disposition of the PHA Property will allow for and facilitate the development of the housing project that will be developed pursuant to 24 CFR 941 Subpart F, this PHA has determined that the disposition is appropriate for the following reasons:
    (a) The disposition is in the best interest of the residents of the PHA and the PHA;
    (b) The disposition is consistent with the goals of the PHA and the PHA Agency Plan and is otherwise consistent with Title 1 of the United States Housing Act of 1937;
11) This PHA will comply with all reporting and recordkeeping requirements of HUD in connection with this inventory removal action and shall make all required reports to the HUD Regional/Field Office with jurisdiction over it. This PHA acknowledges that reporting and recordkeeping requirements are ongoing and certifies it will comply with these requirements after it receives approval to this inventory removal action from the SAC;
12) The PHA described the proposed removal action in its PHA Annual Plan and timetable under 24 CFR Part 903 (except in the case of small or high-performing PHAs eligible for streamlined annual plan treatment), and the description in the PHA Annual Plan is identical to the removal action proposed in this Application and otherwise complies with the Act;
13) The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or 24 CFR Part 50;
14) All attachments and supporting documentation referenced in the Application have been and will continue to be available at all times in the PHA's primary business office.
15) The PHA certifies that the proposed removal action complies with all applicable Federal statutory and regulatory requirements;
16) The PHA will not take any action to commence the proposed removal action until it receives written approval of this action from HUD. In addition, the PHA will not proceed to enter into any long-term ground lease or disposition agreement without HUD's approval of the PHA's submission of documents (i.e. proposal, evidentiary material) for a mixed-finance transaction as set forth in 24 CFR, Part 941, Subpart F. The PHA acknowledges that all of the documents related to Subpart F must be reviewed and approved by HUD prior to any formal disposition action.

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
Signature	Date

PHA Certification of Compliance
De Minimis Exception to Demolition

Acting on behalf of the Board of Commissioners of the _____ (PHA), as its Chairman, Executive Director, or other authorized PHA official, I approve the submission of this Inventory Removal Application (HUD-52860) dated _____ and known as DDA # _____, hereinafter referred to as the "Application", of which this document is a part, and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of this Application and the implementation thereof:

1) All information contained in the Application is true and correct as of the date of this Application;
2)The proposed removal action does not violate any remedial civil rights orders or agreements, compliance agreements, final judgments, consent decrees, settlement agreements, or other court orders or agreements to which this PHA is a party;
3) The PHA certifies that it will carry out the proposed removal action in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990 and will affirmatively further fair housing in carrying out the proposed removal action;
4) The PHA will relocate any residents affected by this proposed inventory removal action in compliance with all applicable federal, state, and local laws, including, without limitation;
5) This PHA will comply with all reporting and recordkeeping requirements of HUD in connection with this inventory removal action and shall make all required reports to the applicable HUD Field Office. The PHA acknowledges that reporting and recordkeeping requirements are ongoing and certifies it will comply with these requirements after it receives approval to this inventory removal action from the SAC;
6) At this time, the PHA is operating _____ public housing dwelling units under its ACC;
7) In the last five years, this PHA has demolished _____public housing dwelling units through the De Minimis demolition exception;
8) The _____ public housing dwelling units identified for demolition as part of this proposed De Minimis exception action do not exceed the statutory maximum of five percent of this PHA's total housing stock, or five dwelling units, whichever is less, when added to the public housing dwelling units previously demolished in this five year period, using the De Minimis demolition exception;
9) The PHA will not demolish any non-dwelling structures or other PHA property other than the dwelling units identified as part of this De Minimis demolition exception action;
10) The PHA will not dispose of any PHA-owned property as part of this De Minimis demolition exception action;
11) The PHA is demolishing the public housing dwelling units because (check one):
(_) the dwelling units are beyond repair; or
(_) the space occupied by these demolished units will be used for meeting the service or other needs of public housing residents (use of space to construct a laundry facility, community center, child care facility, office space for a general provider, or for the use as open space or garden);
12) All attachments and supporting documentation referenced in the Application have been and will continue to be available at all times in the PHA's primary business office;
13) The PHA will comply with all reporting and recordkeeping requirements of and shall make all required reports to the applicable HUD Field Office. The PHA acknowledges that reporting and recordkeeping requirements are ongoing and certifies that it will comply with all applicable reporting requirements after it receives any approvals to this action from the SAC;
14) The PHA certifies that the proposed action complies with all applicable Federal statutory and regulatory laws
15) The PHA will noti take any action to commence the proposed removal action, including without limitation the expenditure of HUD funds, until it receives written approval of this proposed action from HUD.

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
Signature	Date

Provide attachments as needed.
All attachments must reference the Section and line number to which they apply. Previous versions obsolete.

form HUD-52860 (8/2008)

PHA Certification of Compliance
Section 32 Homeownership

Acting on behalf of the Board of Commissioners of the _____ (PHA), as its Chairman, Executive Director, or other authorized PHA official, I approve the submission of this Inventory Removal Application (HUD-52860) dated _____ and known as DDA # _____, hereinafter referred to as the "Application", of which this document is a part, and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of this Application and the implementation thereof:

1) All information contained in the Application (including all attachments and Addendums) is true and correct as of the date of this Application;
2) The proposed removal action does not violate any remedial civil rights orders or agreements, compliance agreements, final judgments, consent decrees, settlement agreements, or other court orders or agreements to which this PHA is a party;
3) The PHA certifies that it will carry out the proposed removal action in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990 and will affirmatively further fair housing in carrying out the proposed removal action;
4) If the PHA is selling public housing units, the PHA has created a Relocation Plan in compliance with all applicable federal, state, and local laws, including, without limitation, Section 32 of the Act and 24 CFR 906, and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) and its implementing regulations at 49 CFR Part 24, and maintains a written copy of the Relocation Plan on file at the central office;
5) The PHA described the proposed removal action in its PHA Annual Plan and timetable under 24 CFR Part 903 (except in the case of small or high-performing PHAs eligible for streamlined annual plan treatment), and the description in the PHA Annual Plan is identical to the removal action proposed in this Application and otherwise complies with the Act;
6) All attachments and supporting documentation referenced in the Application have been and will continue to be available at all times in the PHA's primary business office;
7) The PHA will comply with all reporting and recordkeeping requirements of HUD and shall make all required reports to the applicable HUD Field Office. The PHA acknowledges that reporting and recordkeeping requirements are ongoing and certifies that it will comply with all applicable reporting requirements after it receives any approvals to this action;
8) The PHA certifies that the proposed removal action complies with all applicable Federal statutory and regulatory requirements;
9) If the PHA intends to provide families with assistance under the Section 8(y) homeownership option of the Act in connection with this homeownership program, it will comply with the requirements of Section 8(y) of the Act and Section 8(y)'s implementing regulations;
10) The PHA will comply with all applicable wage requirements as set forth in the Act and 24 CFR 906.37;
11)The amount that eligible purchasers of homeownership units will pay for their housing costs (mortgage, insurance, taxes, etc.) will not exceed 35% income of their adjusted income plus any other subsidy used for monthly payments, as required by 24 CFR 906;
12) The PHA will not take any action to commence the inventory removal action proposed in this Application, including without limitation the expenditure of HUD funds, until it receives written approval of this proposed action from HUD.
13) The PHA certifies that the proposed removal action complies with all applicable Federal statutory and regulatory requirements.

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
Signature	Date

PHA Certification of Compliance
Section 33 Required Conversion

Acting on behalf of the Board of Commissioners of the _____ (PHA), as its Chairman, Executive Director, or other authorized PHA official, I approve the submission of this Inventory Removal Application (HUD-52860) dated _____ and known as DDA # _____, hereinafter referred to as the "Application", of which this document is a part, and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of this Application and the implementation thereof:

1) All information contained in the Application (including all attachments and Addendums) is true and correct as of the date of this Application;
2) The proposed removal action does not violate any remedial civil rights orders or agreements, compliance agreements, final judgments, consent decrees, settlement agreements, or other court orders or agreements to which this PHA is a party;
3) The PHA certifies that it will carry out the proposed removal action in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990 and will affirmatively further fair housing in carrying out the proposed removal action;
4) If applicable, the PHA has created a Relocation Plan in compliance with all applicable federal, state, and local laws, including, without limitation, Section 33 of the Act and 24 CFR 972, and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) and its implementing regulations at 49 CFR Part 24, and maintains a written copy of the Relocation Plan on file at the central office;
5) The PHA described the proposed removal action in its PHA Annual Plan and timetable under 24 CFR Part 903 (except in the case of small or high-performing PHAs eligible for streamlined annual plan treatment), and the description in the PHA Annual Plan is identical to the removal action proposed in this Application and otherwise complies with the Act;
6) All attachments and supporting documentation referenced in the Application have been and will continue to be available at all times in the PHA's primary business office;
7) The PHA will comply with all reporting and recordkeeping requirements of HUD and shall make all required reports to the applicable HUD Field Office. The PHA acknowledges that reporting and recordkeeping requirements are ongoing and certifies that it will comply with all applicable reporting requirements after it receives approval to this action from the SAC;
8) The PHA has developed a Conversion Plan (of 5 years or less) for the removal of the affected public housing units in compliance with 24 CFR 972.130 and has a written copy of that plan on file at the central office of this PHA;
9) The PHA has consulted with the appropriate government officials and affected public housing residents, as required by 24 CFR 972.133, in developing its Conversion Plan;
10) The PHA will use any Net Proceeds that it receives from a disposition of PHA property as a result of this conversion subject to the limitations under section 33 of the Act;
11) The PHA will not commence the demolition or complete disposition of any occupied building that may be disposed or demolished as a result of this Required Conversion until all residents residing in the affected building are actually relocated;
12) The PHA will not take any action to commence the inventory removal action proposed in this Application, including without limitation the expenditure of HUD funds, until it receives written approval of this proposed action from HUD;
13) The PHA certifies that the proposed removal action complies with all applicable Federal statutory and regulatory requirements;

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
Signature	Date

PHA Certification of Compliance
Section 22 Voluntary Conversion

Acting on behalf of the Board of Commissioners of the _____ (PHA), as its Chairman, Executive Director, or other authorized PHA official, I approve the submission of this Inventory Removal Application (HUD-52860) dated _____ and known as DDA # _____, hereinafter referred to as the "Application", of which this document is a part, and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of this Application and the implementation thereof:

1) All information contained in the Application (including all attachments and Addendums) is true and correct as of the date of this Application;
2) The proposed removal action does not violate any remedial civil rights orders or agreements, compliance agreements, final judgments, consent decrees, settlement agreements, or other court orders or agreements to which this PHA is a party;
3) The PHA certifies that it will carry out the proposed removal action in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990 and will affirmatively further fair housing in carrying out the proposed removal action;
4) If applicable, the PHA has created a Relocation Plan in compliance with all applicable federal, state, and local laws, including, without limitation, Section 22 of the Act and 24 CFR 972.230, and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) and its implementing regulations at 49 CFR Part 24, and maintains a written copy of the Relocation Plan on file at the central office. The PHA specifically acknowledges that the URA applies to the extent that any residents are displaced as a direct result of the demolition, acquisition, or rehabilitation of the Development proposed for Voluntary Conversion;
5) The PHA described the proposed removal action in its PHA Annual Plan and timetable under 24 CFR Part 903 (except in the case of small or high-performing PHAs eligible for streamlined annual plan treatment), and the description in the PHA Annual Plan is identical to the removal action proposed in this Application and otherwise complies with the Act;
6) All attachments and supporting documentation referenced in the Application have been and will continue to be available at all times in the PHA's primary business office.;
7) The PHA will comply with all reporting and recordkeeping requirements of HUD and shall make all required reports to the applicable HUD Field Office. The PHA acknowledges that reporting and recordkeeping requirements are ongoing and certifies that it will comply with all applicable reporting requirements after it receives approval to this action from the SAC;
8) Pursuant to Section 22(b)(2) of the Act and 24 CFR 972.206, this PHA has conducted a required initial assessment for each of its developments for all public housing units covered by this Application and retains documentation of its reasoning with respect to the initial assessment copy at its central office;
9)The PHA has conducted a Conversion Assessment in accordance with 24 CFR 972.218 - CFR 972.224 for all public housing units covered by this Application and has determined, based on objective evidence, that the Conversion Assessment demonstrates: (a) the conversion of the proposed public housing units would principally benefit the residents of those affected units, this PHA, and the community in which those units are located; (b) the conversion of the affected residents to Housing Choice Voucher assistance will not be more expensive than continuing to operate their units as public housing; and (c) the conversion of the proposed public housing units will not adversely affect the availability of affordable housing in the community. A written analysis evidencing (a), (b), and (c) of this Section 11 is on file at the central office of this PHA;
10) Pursuant to 24 CFR 972.218, this PHA has conducted an analysis of the likely success of the residents of the units proposed for conversion in using tenant-based assistance Housing Choice Vouchers and have found that there is a sufficient number of available decent, safe, and sanitary dwelling units being rented at or below Housing Choice Voucher standards in the jurisdiction in which the units proposed for conversion are located. A written analysis evidencing the sufficient number of units is on file at the central office of this PHA;
11) Pursuant to 24 CFR 972.218, this PHA has conducted an impact analysis describing the likely impact of the conversion on the neighborhood in which the units proposed for conversion are located and in that analysis, has specifically addressed: (a) the impact of the conversion on the availability of affordable housing in the neighborhood; (b) the impact on the concentration of poverty in the neighborhood; and (3) other substantial impacts on the neighborhood. A written copy of this impact analysis is on file in the central office of this PHA;

12) The PHA has developed a Voluntary Conversion Plan for the removal of the affected public housing units in compliance with 24 CFR 972.230 and the Plan is consistent with the Conversion Assessment. A written copy of that Voluntary Conversion Plan and a written analysis evidencing its consistency with the Conversion Assessment is on file at the central office of this PHA;
13) The Conversion Assessment was conducted or updated on within one year of the date of this Application and the Voluntary Conversion Plan;
14) The PHA has consulted with the appropriate government officials and affected public housing residents, as required by 24 CFR 972.227, in developing its Voluntary Conversion Plan;
15) The PHA will not commence the demolition or complete disposition of any occupied building that may be disposed or demolished as a result of this Voluntary Conversion until all residents residing in the affected building are actually relocated;
16) The PHA will use any Net Proceeds that it receives from a disposition of PHA property as a result of this conversion subject to the limitations under section 22 of the Act;
17) The PHA has assured that all required appraisals/market values have been conducted in compliance with 24 CFR 972, the Appendix to 24 CFR 972, and all applicable HUD Notices. The PHA further certifies that all appraisals/market values were performed by a licensed independent appraiser and the PHA: (a) verified that the appraiser conducting these appraisals was licensed/certified in the state in which the affected Development is located and has evidence of the appraiser's license on file at its central office; and (b) received a certification from the appraiser that the appraisal was conducted using generally accepted appraisal methods and has a written copy of this certification on file at its central office;
18) The PHA will not take any action to commence the inventory removal action proposed in this Application, including without limitation the expenditure of HUD funds, until it receives written approval of this proposed action from HUD;
19) The PHA certifies that the proposed removal action complies with all applicable Federal statutory and regulatory requirements.

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
Signature	Date

PHA Certification—Eminent Domain

Acting on behalf of the Board of Commissioners of the _____ (PHA), as its Chairman, Executive Director, or other authorized PHA official, I approve the submission of this Inventory Removal Application (HUD-52860) dated _____ and known as DDA # _____, hereinafter referred to as the "Application", of which this document is a part, and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of this Application and the implementation thereof:

1) All information contained in the Application (including all attachments and Addendums) is true and correct as of the date of this Application;
2) The proposed removal action does not violate any remedial civil rights orders or agreements, compliance agreements, final judgments, consent decrees, settlement agreements, or other court orders or agreements to which this PHA is a party;
3) The PHA certifies that it will carry out the proposed removal action in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990 and will affirmatively further fair housing in carrying out the proposed removal action;
4) All attachments and supporting documentation referenced in the Application have been and will continue to be available at all times in the PHA's primary business office.;
5) The PHA will comply with all reporting and recordkeeping requirements of HUD and shall make all required reports to the applicable HUD Field Office. The PHA acknowledges that reporting and recordkeeping requirements are ongoing and certifies that it will comply with all applicable reporting requirements after it receives approval to this action from the SAC;
6) The PHA has assured that all required appraisals have been conducted in compliance with and all applicable HUD Notices and laws. The PHA further certifies that all appraisals were performed by a licensed independent appraiser and the PHA: (a) verified that the appraiser conducting these appraisals was licensed/certified in the state in which the affected Development is located and has evidence of the appraiser's license on file at its central office; and (b) received a certification from the appraiser that the appraisal was conducted using generally accepted appraisal methods and has a written copy of this certification on file at its central office;
7) The PHA will comply (or assure that the Taking Body complies) with all applicable local, state, and federal laws in connection with government consultation, resident consultation, and relocation of residents at the Development proposed for condemnation. This PHA specifically acknowledges that the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970, as amended (URA) and its implementing regulations at 49 CFR Part 24 applies to the extent that any residents are displaced as a direct result of the demolition, acquisition, or rehabilitation of the Development proposed for condemnation;
8) The PHA will notify HUD immediately after any action or notices by the Taking Body to commence condemnation proceedings. The PHA shall not take any actions pursuant to such notices or in response to such actions without first notifying HUD.
9. The PHA certifies that the proposed removal action complies with all applicable Federal statutory and regulatory requirements.

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
Signature	Date