

RAD CHOICE MOBILITY GUIDEBOOK



Effective Implementation of
Residents' Choice-Mobility Rights
in RAD Conversions: A Best Practices
Guide for PHAs and Owners

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2. Introduction

In designing the Rental Assistance Demonstration (RAD) program as a strategy to fund capital needs for public housing preservation and rehabilitation, the U.S. Department of Housing and Urban Development (HUD) included a robust suite of resident rights and protections. For instance, RAD prohibits permanent involuntary displacement and requires one-for-one replacement of almost all public housing to avoid net loss of units. Residents living in RAD converted properties also retain tenant organizing rights, grievance and termination protections, and can only be evicted for good cause. Choice-Mobility is another key provision of RAD that is available to residents of a property whose assistance has been converted to project-based vouchers or project-based rental assistance contracts as part of the program (unless a limited exemption has been provided to the property).

Choice-Mobility affords eligible residents the right to request and obtain a tenant-based voucher after an initial period of occupancy and move to a rental unit in the private market. The Choice-Mobility provision, which has its origins in the “Family Right to Move” section of the Project-Based Voucher (PBV) program¹, expands meaningful housing choice for recipients of federal rental assistance who previously would have remained in their units with no right to transition to tenant-based assistance. With a voucher, residents can rent units on the open rental market and can potentially move to neighborhoods with better opportunities, such as higher performing schools, greater access to jobs, and improved environmental conditions.

One of the most exciting aspects of Choice-Mobility relates to the special status of residents in RAD projects. Unlike most families new to the voucher program, and many “movers” with existing vouchers, residents in RAD projects will not be under intense pressure to use their voucher or lose it within a constricted time window. This means, first, that they will have as much time as they need, prior to receiving the voucher, to learn about potential neighborhoods and housing options, to improve their credit if needed, receive mobility counseling if available, and to consider the most ideal timing for a family move. Second, if the resident is ultimately unsuccessful in finding a unit of their choice, they will face less pressure to take any available unit, because they will still have the option of remaining in their RAD unit and trying again with a voucher at a future date.



Residents in RAD projects will not be under intense pressure to use their voucher or lose it within a constricted time window.

As described in the **RAD Notice**², under the First Component of RAD, PHAs may convert assistance of a public housing property to one of two forms of Section 8 Housing Assistance Payment (HAP) Contracts: project-based vouchers (PBVs) or project-based rental assistance (PBRA). Residents living in properties that have converted to PBV have the right to obtain a Choice-Mobility voucher³ after the later of (a) one year from the date of execution of the HAP contract or (b) one year after the move-in date. Residents living in properties that have converted to PBRA have the right to obtain a Choice-Mobility voucher after the later of (a) 24 months from date of execution of the HAP Contract or (b) 24 months after the move-in date. RAD and other PBV residents have first priority for the next available turnover voucher, but in cases where demand for Choice-Mobility is high, HUD permits the following caps⁴: For conversions to PBV, PHAs may not be required to provide more than three-quarters of its turnover voucher inventory in any single year to residents of RAD covered projects (see RAD Notice section 1.6.D.8). For PBRA conversions, PHAs may not be required to provide more than one-third of their turnover voucher inventory in any year to residents of RAD properties. PHAs may also limit Choice-Mobility moves to 15 percent of assisted units in a RAD project in a year (for additional PBRA provisions **see section 7** below).

As revealed by a recent HUD study⁵, many residents in RAD properties are unaware of their right to move, and many PHAs have not yet developed policies and procedures for implementing Choice-Mobility. The

¹ See 24 CFR § 983.261. Much of the guidance here can also be applied to a PHA's administration of the Family Right to Move provision for standard project-based vouchers.

² PIH Notice 2019-23/H Notice 2019-09. Hereinafter referred to as 'RAD Notice'.

³ The Choice-Mobility right is for continued tenant-based rental assistance, so in rare cases the family may receive a form of assistance other than a voucher.

⁴ HUD permits these caps only with respect to RAD-PBV or RAD-PBRA units, but not to any non-RAD PBV units located within the same covered project.

⁵ Dennis Stout, Frankie Clogston, Alexander Thackeray, Jennifer Stoloff, Brad Anthony, Econometrica Inc., Christopher Hayes, Urban Institute. *Evaluation of HUD's Rental Assistance Demonstration (RAD): Final Report*. Washington, DC: U.S. Department of Housing and Urban Development, 2019, p. 128. <https://www.huduser.gov/portal/publications/RAD-Evaluation-Final-Report.html>

purpose of this best practices guide, and accompanying sample forms, is to provide a practical resource for PHAs and property managers to fully implement the requirement.

The best practices guide covers Choice-Mobility in the context of both types of First Component RAD conversions — PBV and PBRA — and will make note of important differences when they arise. Sections cover the following topics:

- Components of a comprehensive Choice-Mobility policy;
- Resident eligibility for a Choice-Mobility voucher;
- Requesting a Choice-Mobility voucher;
- Choice-Mobility Priority List management;
- Turnover voucher management;
- Strengthening coordination between property managers and the PHA;
- Notifying residents of their Choice-Mobility rights;
- Transitioning to the HCV program;
- Maximizing the effectiveness of Choice-Mobility.

In addition, this guide provides sample materials that PHAs will likely find useful to fully implement Choice-Mobility. Included are the following samples:

- Information document to notify residents of their right;
- Choice-Mobility request form;
- PHA letter acknowledging receipt of voucher request;
- Agenda for resident meeting about Choice-Mobility;
- Checklist for PHA staff;
- Letter of Agreement between PHA and PBRA project owner;
- Choice-Mobility Plan Template (Addendum to PHA Plan and HCV Administrative Plan).



3. Components of a Comprehensive Choice-Mobility Policy

Crafting a well-designed Choice-Mobility policy is critically important to the implementation of Choice-Mobility. A comprehensive and clearly designed policy can help provide guidance to PHA staff, notify residents about their Choice-Mobility rights, and allow residents to learn more about what the Choice-Mobility process will look like and how it will affect their lives. PHAs are advised to develop a comprehensive Choice-Mobility policy as early as possible, ideally before the final closing of a RAD conversion. The policy would designate which PHA staff will oversee Choice-Mobility implementation, including communicating with residents, and training of frontline staff on its details. The components of a complete Choice-Mobility policy are described below.

Create a Choice Mobility Plan (templates provided)

It is a best practice that PHAs develop a Choice Mobility Plan as the foundation for a comprehensive Choice-Mobility policy. This guide includes Choice-Mobility Plan templates for PBV ([section 12.7](#)) and PBRA ([section 12.8](#)) conversions. The templates outline key PHA policies regarding the implementation of Choice-Mobility. Topics in the templates include: a statement of Choice-Mobility rights for residents, how a PHA provides Choice-Mobility information/notice to residents, processing requests for Choice-Mobility, and maximizing the potential benefits of Choice-Mobility. A completed template may be included as an addendum to the PHA plan and the HCV Administrative Plan. It is recommended that physical copies of the completed Choice-Mobility policy be made available in the property management office and provided in electronic form on the internet.

Elaboration of Procedures

In addition to the information outlined in the template, it is suggested that PHAs incorporate into their comprehensive Choice-Mobility policy step-by-step procedures for how residents will complete the process of receiving a Choice-Mobility voucher. This will provide clarity to residents and remove uncertainty about the process. Several key topics to include are:

1. a clear description of how residents request a voucher;
2. a statement indicating that residents requesting Choice-Mobility receive priority in the issuance of turnover vouchers;
3. Choice-Mobility Priority List procedures (including but not limited to: how the PHA will provide notice to the resident when they issue a voucher, resident actions that can result in removal from the Priority List, whether and how PHAs will manage turnover voucher caps, and priority rankings on these lists, if any);
4. obligations and procedures once a resident receives a Choice-Mobility voucher; and
5. considerations that residents are advised to take into account when transitioning to tenant-based rental assistance.

These procedures are best written in a clear and easy-to-understand manner.

Key Supporting Documents

PHAs may want to consider including several additional supporting documents alongside their completed template as part of their comprehensive Choice-Mobility policy. These documents include:

1. a plain language information sheet that will notify residents about their Choice-Mobility right ([see section 12.1](#)),
2. a simple Choice-Mobility request form ([see section 12.2](#)), and
3. a letter of agreement between a project owner and the PHA (required for PBRA conversions only, [see section 12.6](#)).

Providing these documents helps to keep residents and staff more informed about the overall Choice-Mobility process.

Key Differences in Choice-Mobility for PBV and PBRA Conversions

PHAs should be aware of the differences in Choice-Mobility for PBV and PBRA conversions and make sure they are accounted for in their plans. Some of the most notable differences include:

1. eligibility timeframes ([see section 4](#)),
2. turnover cap policies ([see section 7](#)), and
3. with whom responsibility lies for managing Choice-Mobility ([see section 8](#)).

On point (3), project owners in PBRA conversions may assume some of the responsibilities that a PHA would typically handle in a PBV property. As a result, PHAs converting projects to PBRA must include a written agreement discussing protocols that clearly outline the specific responsibilities that will be assumed by both PBRA project owners and PHAs in the implementation of Choice-Mobility.⁶ It is a best practice that PHAs also include monitoring mechanisms to help ensure that project owners as well as all frontline staff are meeting their obligations and develop procedures for training project owners on their Choice-Mobility responsibilities.

Inclusion of Choice-Mobility information in the RAD lease

A statement of Choice-Mobility rights must also be incorporated as an addendum to the house rules for PBRA conversions. Attachment 1E of the RAD Notice outlines information that must be included as part of the House Rules for a PBRA property. Specifically, item “c” addresses Choice-Mobility (“Family Right to Move”) and gives the language to be inserted into the PBRA house rules.⁷ For RAD PBV conversions, the lease language on Choice-Mobility can be found in Part B § 11 in the standard PBV tenancy addendum.⁸



4. Initial Resident Eligibility for a Choice-Mobility Voucher

Choice-Mobility is designed to give every resident in a RAD property housing choice and expanded housing opportunities. Therefore, Choice-Mobility is open to all residents in RAD properties once they have lived in a property for a defined period of time. The amount of time that a resident needs to live in a property in order to be eligible for Choice-Mobility differs depending on whether they live in a property⁹ that has converted to Project-Based Vouchers (PBV) or Project-Based Rental Assistance (PBRA).¹⁰

⁶ See RAD Notice, section 1.7.C.5: “The voucher agency must maintain a written agreement with the owner describing how the Choice-Mobility option will be administered in accordance with these requirements and the process by which households may request a voucher. For example, the written agreement must specify whether the owner will receive requests from families or refer families to the PHA.”

⁷ The pertinent language is as follows: “Each family has the option to obtain tenant-based rental assistance (commonly known as a Housing Choice Voucher) from [name of the PHA], subject to certain program limitations, at any time after the second year of occupancy. Before providing notice to terminate the lease, the family must first contact the PHA to request tenant-based rental assistance if the family wishes to move with continued assistance. If tenant-based rental assistance is not immediately available, the PHA shall give the family priority to receive the next available opportunity for tenant-based rental assistance. After the PHA offers the family the opportunity for tenant-based rental assistance in accordance with HUD requirements and after the family has secured a lease with such tenant-based rental assistance, the family must give the owner advance written notice of intent to vacate (with a copy to the PHA) in accordance with the lease.”

⁸ See here: <https://www.hud.gov/sites/dfiles/OCHCO/documents/52530c.pdf>.

The pertinent language is as follows:

“a. The family may terminate its lease at any time after the first year of occupancy. The family must give the owner advance written notice of intent to vacate (with a copy to the PHA) in accordance with the lease. If the family has elected to terminate the lease in this manner, the PHA must offer the family the opportunity for tenant-based rental assistance in accordance with HUD requirements.
b. Before providing notice to terminate the lease under paragraph a, the family must first contact the PHA to request tenant-based rental assistance if the family wishes to move with continued assistance. If tenant-based rental assistance is not immediately available upon lease termination, the PHA shall give the family priority to receive the next available opportunity for tenant-based rental assistance.”

⁹ Some properties may be part regular PBV and part RAD-PBRA, typically as a result of a RAD/Section 18 blend. In such cases RAD-PBRA requirements pertain to the RAD-PBRA units and regular PBV (not RAD-PBV) requirements pertain to the regular PBV units.

¹⁰ The only other criterion is that the resident meets the eligibility criteria for the HCV program.

Project-Based Vouchers

In RAD properties that have converted to PBV, residents are eligible to obtain an HCV beginning (and continuing) one year after the conversion of the property (effective date of the HAP contract) or one year after they move into the property, whichever comes later.¹¹ Because a family transitioning to a tenant-based voucher continues to be a participant in the HCV program, they are not subject to any screening requirement.

PBRA

In RAD properties that have converted to PBRA, residents are eligible to obtain an HCV beginning (and continuing) 24 months after the conversion of the property (effective date of the HAP contract) or 24 months after they move into the property, whichever comes later.¹² Additionally, the family must qualify for assistance under the PHA's HCV program (e.g., meet income requirements).

Eligibility for Choice-Mobility Does Not Expire

The right to a Choice-Mobility voucher **does not expire as long as the resident still lives in the property**. It is recommended that PHAs ensure that residents are informed that they remain eligible for a Choice-Mobility voucher on an ongoing basis at any point after they have met the minimum residency requirement needed to qualify for a voucher. Informing residents of this aspect of Choice-Mobility can help residents take the time they need to fully prepare for a housing search and move when circumstances are right for them. As discussed later, residents can use this time, for example, to learn more about neighborhoods and housing options, work to improve their credit, save up for a security deposit and other moving expenses, and receive mobility counseling, if available ([see section 11](#)).

Eligibility for Choice-Mobility Continues After Failure to Use a Voucher

If a resident is issued a Choice-Mobility voucher but does not ultimately use it to lease a unit on the open market within the PHA's prescribed HCV search times, they remain eligible for a Choice-Mobility voucher in the future as long as they continue to live in the same RAD project. It is a best practice that PHAs ensure that residents are informed that they can make multiple requests to receive a Choice-Mobility voucher and conduct another housing search in the future if their initial search does not succeed. This can help to ease some of the pressure typically associated with a housing search when residents often feel they must use the voucher within the search time limit or else lose the opportunity to get a voucher in the future.

Ability to Stay in a RAD Unit

If an eligible resident receives a Choice-Mobility voucher but does not succeed in leasing a rental unit on the open market, they retain the right to stay in their current unit so long as the resident has not yet provided notice to vacate to the owner. This ability to stay in the RAD unit provides a safety net for residents and can also ease the pressure to take any available unit they can find instead of a unit of their choice that meets their

¹¹ RAD Notice section 1.6.D.8

¹² RAD Notice section 1.7.C.5

needs. A best practice is to clearly inform residents throughout the Choice-Mobility process that they may stay in their current RAD unit while they search for housing and may stay even if their housing search fails. PHAs are prohibited from requiring residents to provide notice to vacate any earlier than the time required by the lease.¹³ To preserve the safety net for residents, it is a best practice for owners' leases to require only a short period of notice to vacate and to allow residents to rescind their notice to vacate or to find an alternative housing option if the resident has been unable to lease another unit using Choice-Mobility.



5. Requesting the Choice-Mobility voucher

All eligible residents can request a Choice-Mobility voucher (unless a limited exemption has been provided to the property). A best practice is for PHAs to implement an efficient and clear request process to guarantee that all residents have an equal opportunity to exercise the Choice-Mobility option. This includes providing clear guidance and instructions to residents regarding how to make a request—including when and where to obtain a voucher request form, and how to make requests online.

Provision and submission of Choice-Mobility request form

As noted previously, PHAs are encouraged to create and make available Choice-Mobility voucher request forms to be filled out in writing (with an online option) by the head or co-head of the household (also [see section 12.2](#) for a sample request form). In addition to prompting the resident to supply basic information (e.g. name, address, RAD property, etc), for residents in RAD-PBRA units these forms will likely also ask for certification that the 24 month residency requirements have been met.¹⁴

At or before the initiation of the RAD conversion, and also at a new resident's initial lease signing for a RAD unit, the PHA and/or property manager are encouraged to provide direction about how and when to request a Choice-Mobility voucher including how to obtain and submit the request form. It is a best practice that these notifications also be repeated at income recertification. PHAs can distribute these forms to property managers such that eligible residents can request and receive their Choice-Mobility request form from managers at the RAD property where they live. It is advised that residents be provided with contact information indicating where (and from whom) they can obtain the request form in their property.

Determining initial resident eligibility and processing of request form

After a Choice-Mobility request form has been submitted to the appropriate party, an initial determination will be made by the PHA as to the resident's eligibility. The PHA central office will need to confirm that the residency requirement has been fulfilled, likely by making reference to the official record of the lease start date.¹⁵ Residents from a PBV property are not subject to further screening. Residents from a PBRA property must qualify for admission into the HCV program.

¹³ 24 CFR § 983.261(a).

¹⁴ The PHA should be easily able to confirm the residency requirement for residents in RAD-PBV units requesting Choice-Mobility.

¹⁵ The PHA determines eligibility for continued tenant-based assistance. If specified in a written agreement with the PHA, the property manager of RAD-PBRA units may determine eligibility for Choice-Mobility.

Once the request has been received and processed by the PHA, residents should be offered the next available voucher. If a Choice-Mobility voucher is not immediately available or the PHA has reached their turnover cap, the PHA must engage in record-keeping to ensure the resident receives the next available voucher. For instance, the PHA may place the resident on a Choice-Mobility Priority List ([see more below in section 6](#)). In such a case, it is recommended that the PHA promptly send the family a letter acknowledging the PHA's receipt of the voucher request and the family's placement onto the Priority List.



6. Choice-Mobility Priority List Management¹⁶

Creating and maintaining a separate Priority List for Choice-Mobility requests is recommended for most PHAs. Eligible families requesting Choice-Mobility must be ranked in the order that the requests were received, to receive the next available voucher. After a resident has made a request, PHAs are encouraged to send them an acknowledgment of the receipt of their Choice-Mobility request and of their successful placement onto the Choice-Mobility Priority List. ([See section 12.3](#) for a sample acknowledgement letter.)

Choice-Mobility rights are based on the “Family Right to Move” section of the project-based voucher regulations,¹⁷ and extended by the RAD Notice to most PBRA developments as well. PHAs must give automatic priority¹⁸ for available turnover vouchers to residents of RAD developments¹⁹ before serving the regular HCV waitlist, except for special purpose vouchers that are limited in eligibility.

PHAs may not always need to maintain a Choice-Mobility Priority List. For example, a separate list may be unnecessary when they receive very few Choice-Mobility requests and can easily issue Choice-Mobility vouchers to these residents when turnover vouchers are available. Nonetheless, maintaining a separate Choice-Mobility Priority List can be valuable even when few residents make requests. For instance, creating a Priority List can be used for recordkeeping/audit purposes or to have information systems in place in the event of a surge in requests. It is especially important for PHAs to employ a Choice-Mobility Priority List when demand for Choice-Mobility is high, particularly if the number of requests regularly exceeds the availability of turnover vouchers, and PHAs are required to create a Choice-Mobility Priority List if they have a sufficient number of requests to implement a voucher inventory turnover cap or project turnover cap.²⁰

Creation / maintenance of Choice-Mobility Priority Lists

PHAs are recommended to maintain a Choice-Mobility Priority List for tenant-based assistance for residents in RAD projects (i.e. Choice-Mobility) that is separate from the waitlist for their main HCV program. Note, however, that in the case of PBRA the resident must be on both the HCV program waitlist and the Choice-Mobility

¹⁶ The RAD Notice (see sections 1.6.D.8 and 1.7.C.5) refers to the Choice-Mobility Priority List as a “waiting list”. However, since “waiting list” has a particular meaning in the HCV and public housing contexts, a different term is used in this document to avoid confusion.

¹⁷ See HUD's RAD Resource Desk, here: “For RAD, the Choice-Mobility was modeled after the requirements in the PBV program. The statutory reference is Section 8(o)(13)(E)(i) of the Housing Act of 1937. The regulatory reference is 24 CFR §983.261. Under RAD, HUD made no changes in Choice-Mobility for PBV conversions. For PBRA conversions, see section 1.7(C)(5).” The regulation holds that PHAs must offer families who have opted to terminate their PBV lease after one year of occupancy an opportunity for tenant-based rental assistance.

¹⁸ For RAD-PBRA properties, see p.153 of the RAD Notice: “If tenant-based rental assistance is not immediately available, the PHA shall give the family priority to receive the next available opportunity for tenant-based rental assistance.” For RAD-PBV properties, see 24 CFR §983.261(c) on the Family right to move provision: “If voucher or other comparable tenant-based rental assistance is not immediately available upon termination of the family's lease of a PBV unit, the PHA must give the family priority to receive the next available opportunity for continued tenant-based rental assistance.”

¹⁹ Priority is also afforded to non-RAD PBV tenants, per the PBV “Right to Move” provision.

²⁰ See RAD Notice, sections 1.6.D.8 (PBV) and 1.7.C.5 (PBRA).

Priority List if the lists are separate; this is because PBRA residents must be newly admitted to the HCV program from the waitlist (unlike PBV residents, who are not new admissions upon accepting a tenant-based HCV). When the PHA determines that turnover vouchers are available, they would first identify names on the Choice-Mobility Priority List before drawing names from the regular HCV waitlist. PHAs would then promptly issue the next available voucher to residents whose names have been drawn from the Choice-Mobility Priority List and who are ready to accept their voucher. Furthermore, if the PHA has implemented a turnover cap, they will select only that percentage of names from the Choice-Mobility Priority List pertinent to the cap.²¹

A PHA may have requests for tenant-based assistance coming both from residents in traditional PBV projects and from RAD projects. A RAD resident does not have priority for tenant-based assistance over a non-RAD PBV resident. In such scenarios, a PHA will likely want to create a single Priority List for all requests for tenant-based assistance coming from PBV developments (RAD and non-RAD) and RAD PBRA developments sorted by the date and time the resident submitted the request. Non-RAD PBV residents, including those in the same project as RAD residents, are not subject to turnover caps ([see section 7](#)).

Other considerations

In some instances, families that have requested Choice-Mobility may not always be ready to accept an HCV when their name is drawn from the Choice-Mobility Priority List. HUD has not developed guidance to PHAs on what to do when families indicate an interest in moving at a later date. A PHA can establish policies on how to treat such families. For example, the PHA could ask the family whether they wish to retain their position on the list, automatically move the family to the bottom of the list or remove the family from the Priority List. Furthermore, a PHA could advise families that they are able to re-submit a Choice-Mobility request at a future date when they are better prepared to move.²²

Removal from the Choice-Mobility Priority List

Families will generally be removed from the Choice-Mobility Priority List if they move out of the RAD project.²³ Families living in the RAD project who happen to be on the regular HCV waitlist are allowed to request a Choice-Mobility voucher if eligible and to remain on both lists. If the family moves out of the RAD unit, they would be removed from the Choice-Mobility Priority List but could remain on the regular HCV waitlist.

Communication of Choice-Mobility Priority List information

As noted above, it is a best practice that the resident receives a letter of acknowledgment from the PHA that their Choice-Mobility request has been received and that they have been added to the Choice-Mobility Priority List. A further best practice is that the letter includes information about the length of the Choice-Mobility Priority List and provides an average wait time based on the last quarter of data. Although in some cases residents will receive their Choice-Mobility voucher as soon as the PHA next releases turnover

²¹ See the next section on turnover caps for details.

²² These suggested policies could pertain to either a discretionary or mandatory list. PHAs must have a Priority List if vouchers are not immediately available upon request or if they are implementing a turnover cap; they have discretion to create a list in other situations.

²³ A notable exception applies for families when the family or a member of the family is a victim of Violence Against Women Act (VAWA)-covered crimes and meets the criteria at 24 CFR. §983.261(c)(1).

vouchers, providing information about wait times can help make sure that families have a realistic sense of when the voucher will be issued after they submit a request form. Furthermore, PHAs are encouraged to provide information to residents about Priority List policies including any voucher inventory turnover caps or project turnover caps that may be in place.



7. Turnover Caps

While Choice-Mobility is a cornerstone of RAD policy, it remains important for PHAs to still be able to issue tenant-based vouchers to families on their regular HCV waitlist. As a PHA converts more public housing to RAD, automatic priority may result in a large number of families eligible to exercise their Choice-Mobility option. As a result, it is possible for much of the PHA's turnover vouchers being used to assist those RAD families requesting Choice-Mobility. PHAs should consider developing a plan for balancing requests for RAD Choice-Mobility and their regular HCV program, consistent with the RAD Notice procedures for Choice-Mobility turnover caps.

Issuing turnover vouchers in a more balanced way will involve determining whether and how to effectively implement a turnover cap, which permits but does not require PHAs to limit the number of turnover vouchers they provide in any given year to residents of RAD-PBV or RAD-PBRA units. Turnover caps are optional policies that PHAs may adopt for occupants of units covered under RAD HAP contracts to try to maintain the ability to provide tenant-based assistance to low-income households not living in RAD units. Turnover caps that pertain to RAD PBV projects differ from caps applying to RAD PBRA projects.

Turnover caps — RAD PBV

As described in the RAD Notice²⁴, HUD permits (but does not require) PHAs converting public housing to PBV to adopt a turnover voucher inventory cap if the total number of PBV units (including RAD PBV units) under the HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD. If this threshold criterion is met, a PHA would not be required to provide more than three-quarters of its turnover vouchers in any single year to residents requesting Choice-Mobility. If an inventory cap is implemented through the HCV Administrative Plan, the PHA must create and maintain a Choice-Mobility Priority List in the order in which the requests from eligible households were received. The inventory cap does not apply to PBVs entered into outside of the context of RAD.

If a PHA seeks to implement an inventory cap, the PHA must establish the cap such that no more than 75 percent (or a higher percentage at the PHA's discretion) of available vouchers in a single year go to residents on the Choice-Mobility Priority List.²⁵ If there are any remaining households from RAD PBV properties that could not receive a voucher as a result of this limitation, they would be first on the list on the next round of vouchers, as their date of request should top the list. Note that non-RAD PBV residents requesting HCVs are not included in any turnover cap.

²⁴See RAD Notice, section 1.6.D.8.

²⁵As noted in the RAD Notice (section 1.6.D.8), this PBV inventory cap provision is an alternative to Section 8(o) (13)(E) of the United States Housing Act of 1937 and 24 CFR § 983.261(c).

Turnover voucher caps — RAD PBRA

As described in the RAD Notice²⁶, HUD permits but does not require PHAs converting public housing to Project Based Rental Assistance to implement a turnover voucher inventory cap. If a PHA opts to institute the cap, they would not be required, in any year, to provide more than one-third of turnover vouchers to the residents of RAD PBRA projects. If an inventory cap is implemented the PHA must create and maintain a Choice-Mobility Priority List in the order in which the requests from eligible households were received.

The RAD Notice also allows for project-specific turnover voucher caps for RAD PBRA conversions. Project owners and PHAs may agree to limit the number of Choice-Mobility moves exercised by eligible households to 15 percent of the assisted units in the project in any given year. While a project owner and PHA are not required to establish a project turnover cap, if such a cap is implemented the PHA must create and maintain a Choice-Mobility Priority List in the order in which the requests from eligible households were received.



8. Strengthening Coordination Between RAD PBRA Property Managers and the PHA

While PHAs are responsible for Choice-Mobility, project owners also play an important role in managing its implementation. For instance, in RAD properties that convert to PBRA, project owners assist in informing residents about their Choice-Mobility rights and help residents complete a mobility move. PHAs should ensure that project owners are fulfilling their responsibilities and must establish procedures to both exercise oversight of owners and detail what role owners and property managers will have in the implementation of Choice-Mobility.

Letters of Agreement

In RAD PBRA properties, a Choice-Mobility Letter of Agreement signed by the owner of the converted units and the PHA administering the Choice-Mobility vouchers is a required component of a financing plan.²⁷ Specifically, the RAD Notice states that: “The voucher agency must maintain a written agreement with the owner describing how the Choice-Mobility option will be administered in accordance with these requirements and the process by which households may request a voucher. For example, the written agreement must specify whether the owner will receive requests from families or refer families to the PHA.”²⁸ This Letter of Agreement outlines the basic responsibilities that project owners and PHAs will assume for Choice-Mobility. A sample of such a letter is included as part of the supplementary materials in the best practices guide ([see section 12.6](#)).

The sample letter of agreement suggests a number of specific responsibilities for project owners and PHAs. For instance, it is recommended that letters of agreement require project owners to do the following: cooperate with PHAs to ensure that residents are informed about their Choice-Mobility rights; notify residents of their Choice-Mobility rights at specific times including at lease signing, income recertification, and at the completion of renovations or reoccupancy in a property; provide the PHA access in order to

²⁶See section 1.7.C.5, RAD Notice.

²⁷RAD Notice Attachment 1A – Financing Plan Requirements and Feasibility Benchmarks

²⁸RAD Notice section 1.7.C.5.

communicate or meet with residents; provide assistance with the process for requesting a Choice-Mobility voucher; help to facilitate a transition from a PBRA property to a unit rented with a Choice-Mobility voucher; and maintain the RAD tenancies of residents who do not utilize a Choice-Mobility voucher.

Owner Responsibility Protocols

PHAs are encouraged to develop protocols that describe how the responsibilities of project owners to implement Choice-Mobility in PBRA RAD properties will be enacted. For instance, PHAs could create mechanisms to monitor how Choice-Mobility is being implemented in RAD PBRA properties. PHAs may want to consider exercising oversight by regularly reviewing notices and other materials issued by project owners that inform residents of their rights, auditing briefings, and other actions. PHAs may also want to communicate directly with project residents to ensure that they are being informed of their rights. In addition, a best practice is for PHAs to have protocols that cover how often the owner must provide information to the residents about Choice-Mobility.

In addition, PHAs should consider creating procedures to train property owners and managers (if management is assumed by a third-party management agent) about Choice-Mobility so that they are prepared to implement the program when residents become eligible. Doing so will help to ensure that residents at all properties receive consistent information about Choice-Mobility and help project owners to meet their obligations. A best practice is for PHAs to plan how they will coordinate with property management to implement Choice-Mobility if the property is managed by a third-party management agent. These procedures can be incorporated into a PHA's Choice-Mobility policy.



9. Notifying residents of their Choice-Mobility rights

Successful implementation of the Choice-Mobility provision requires that PHAs provide residents clear and concise information on their mobility rights. There is early evidence that many residents are unaware of Choice-Mobility. HUD's June 2019 RAD Evaluation report finds that close to 50 percent of residents surveyed reported that they were not informed about the option to receive an HCV under Choice-Mobility.²⁹

At a minimum, before closing of the RAD conversion PHAs must provide public housing residents with appropriate information to make their basic Choice-Mobility rights known to them, both in writing and at several public meetings (detailed below).

In addition, as a best practice and to best facilitate mobility for those interested, it is recommended that residents also be informed of their Choice-Mobility rights after conversion and well before they are eligible to move. It is further encouraged that information be made available in an easy-to-understand format such that residents may be specifically educated on how to take advantage of their Choice-Mobility rights. Information provided to residents may describe eligibility criteria, how to request a Choice-Mobility voucher, Choice-Mobility Priority List and voucher inventory turnover cap and project turnover cap procedures (where pertinent), and steps residents will take to transition from RAD to a voucher. Contact information for PHA staff can also be provided so that residents know with whom they can communicate about the Choice-Mobility

²⁹Dennis Stout, Frankie Clogston, Alexander Thackeray, Jennifer Stoloff, Brad Anthony, Econometrica Inc., Christopher Hayes, Urban Institute. Evaluation of HUD's Rental Assistance Demonstration (RAD): Final Report. Washington, DC: U.S. Department of Housing and Urban Development, 2019, p. 128.

process. PHAs are also urged to specifically inform residents that they have the right to remain in their RAD unit if they fail to secure a rental unit using a tenant-based voucher, will retain all their rights as a resident of the RAD property, and do not waive any right to a future voucher.

Furthermore, making meaningful information available to residents will help ensure that they have adequate time to research different neighborhoods, search for new housing, and prepare for a move. PHAs are encouraged to provide all residents with information on Choice-Mobility, regardless of the ownership status of the RAD project.

Provide Choice-Mobility information to residents at multiple times

To ensure that residents are fully aware of and understand their mobility rights, PHAs are encouraged to provide clear information on Choice-Mobility to residents at multiple times in the RAD process.

The RAD Notice specifies that before even submitting an application to participate in RAD, the PHA must provide written notification in the form of a RAD Information Notice (RIN)³⁰ to residents of projects proposed for conversion to inform the residents of the PHA's intent to pursue a conversion and of their rights in connection with a proposal. The discussion of resident rights in the RIN must include information on the resident's ability to request and move with a Choice-Mobility voucher.³¹ Also prior to application but after issuing the RIN, the RAD Notice³² states that the PHA must hold two meetings with residents of projects proposed for conversion to discuss conversion plans and resident rights, including Choice-Mobility. Before a RAD conversion closes but after issuance of the RAD Conversion Commitment (RCC), the PHA must notify residents that conversion of the project has been approved and, among other things, also inform residents about procedures for the exercise of Choice-Mobility.³³ This information can be provided at the same time as information regarding the right to remain or return in the RAD program. Doing so will make it clear that residents will have expanded housing choice through RAD.

After the completion of the conversion, PHAs are encouraged to give all residents a plain language written notice of their Choice-Mobility rights at multiple points in time. This notice ([see section 12.1](#) for a sample) may take the form of an "information sheet", a "Frequently Asked Questions (FAQ)" document, a flyer, etc., and it could provide information pertaining to at least the basic elements of the resident's Choice-Mobility rights as described above: eligibility criteria, step-by-step voucher request procedures, Choice-Mobility Priority List and turnover cap information, transitioning to a voucher from RAD, and a resident's right to remain in the RAD unit.

In addition, it is recommended that the Choice-Mobility notice inform families that their voucher gives them the right to move to an affordable



It is a best practice that the Choice-Mobility notice be provided to new residents at their lease signing.

³⁰See RAD Notice, section 1.8.A.1. See also the [RAD Fair Housing, Civil Rights and Relocation Notice](#), section 6.6.A, which notes that the "PHA shall provide a RAD Information Notice to all residents of a Converting Project prior to the first of the two meetings with residents required by the RAD Notice ... and before submitting a RAD Application."

³¹For instance, see Attachment #2 in the sample RIN, here: https://www.radresource.net/rad_resident_info_notice.docx

³²See section 1.8.A.3.

³³See RAD Notice section 1.8.D.

apartment anywhere in the region or beyond including to higher opportunity, low poverty neighborhoods (**see also section 11**). It is a best practice that the Choice-Mobility notice be provided to new residents at their lease signing. Also at lease signing, the PHA can explain the Choice-Mobility option to the resident. Subsequently, the notice could also be provided by the PHA at least annually, including at recertification. Furthermore, it is encouraged that PHAs provide the plain language notice to each resident at least four months prior to the date they would first become eligible for a tenant-based voucher. PHAs should consider maintaining a plain language webpage explaining Choice-Mobility, make the plain language notice available at the management office or other prominent locations at the property, and make available a PDF of the plain language notice and a request form that can be either printed or filled out online.

To ensure that they are making an informed choice, residents can also be informed about potential disadvantages of the HCV program as compared to the RAD program. These may include possible additional costs that would not be faced in the RAD program (such as HCV program features that could cause a resident to pay more than 30 percent of their monthly income) and potential gaps in tenant protections, such as the fact that landlords may choose not to renew a lease after the first year or other renewal term (requiring the resident to seek a new apartment with their voucher).

PHAs are encouraged to offer in person meetings at least twice a year with residents at the RAD development to explain the Choice-Mobility option and provide the plain language notice to residents. PHAs can also present on Choice-Mobility during existing resident meetings in order to reach as many residents as possible.³⁴

Accessibility of Choice-Mobility Information

To fulfill their obligations under Title VI of the Civil Rights Act and to reach as many residents as possible, PHAs are required to make reasonable efforts to provide meaningful language access for limited English proficiency (LEP) persons.³⁵ PHAs can conduct a four-factor analysis to help determine what kind of language assistance is appropriate for their community and develop a language access plan to implement appropriate measures.³⁶ PHAs should translate and make accessible to LEP persons all Choice-Mobility plans, notices, request forms, web-based materials, and leases, as well as any other communication with residents concerning Choice-Mobility. Additionally, in accordance with 24 CFR §8.6, PHAs must effectively communicate information about Choice-Mobility to persons with disabilities. Interpreters should be present and accessibility accommodations should be made at resident meetings where Choice-Mobility is discussed by PHA staff and/or property management.

³⁴As noted in HUD's Guidance on the Use of Tenant Participation Funds (PIH 2021-16 (HA)), HUD provides \$25 per unit per year to PHAs for tenant participation activities.

³⁵U.S. Dep't of Housing and Urban Dev., "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons," 72 Fed. Reg. 2732 (Jan. 22, 2007), available at: <https://www.govinfo.gov/content/pkg/FR-2007-01-22/pdf/07-217.pdf>

³⁶U.S. Dep't of Housing and Urban Dev., "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, Appendix A" 72 Fed. Reg. 2732, 2747 (Jan. 22, 2007), available at: <https://www.govinfo.gov/content/pkg/FR-2007-01-22/pdf/07-217.pdf>. The analysis balances the following four factors: (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee; (2) the frequency with which LEP persons come in contact with the program; (3) the nature and importance of the program, activity, or service provided by the program to people's lives; and (4) the resources available to the grantee/ recipient and costs.



10. Transitioning to the HCV program

When a resident applies for and is issued a Choice-Mobility voucher, they must navigate a transition to the HCV program. PHAs must give an oral briefing when a resident is selected to participate in the program.³⁷ This briefing must include information on how the HCV program works, family and owner responsibilities, and where a family can lease a unit.³⁸ The oral briefing must also explain how portability works and explain the advantages of areas that do not have a high concentration of low-income families.³⁹ It is a best practice for PHAs to provide additional information beyond what is required to help residents know as much as possible about the HCV program and the final steps needed to complete the transition to the program. PHAs should also consider providing information about the HCV program during information sessions about Choice-Mobility to help residents successfully complete a move.

Briefing to explain HCV Program Elements

It is a best practice that the PHA promptly schedule a meeting with each family requesting Choice-Mobility when their name is drawn from the Priority List. As previously mentioned, PHA staff must provide information about how the HCV program works, where a family may lease a unit, and how portability works. PHAs may also choose to schedule when the voucher will be issued, provide greater detail about the program and the requirements and features of the HUD portability rule, and distribute apartment listings that include lower poverty neighborhoods. The family requesting Choice-Mobility may join an orientation for new voucher holders if one is scheduled in the near future.

During this briefing, residents could learn about the housing search process, including submission of Request for Tenancy Approval, owner screening, rent determination, and the need to find a unit that will meet HQS standards and pass an inspection by the PHA. In addition, it is encouraged for PHAs to inform residents about the need to pay moving expenses and utilities in the new unit. It is a best practice to explain to residents that the voucher has an expiration date and that receiving a voucher is not a guarantee that a rental unit will be found. This initial briefing could provide information to the resident about how rents work in the HCV program, that they are based on HUD-determined Fair Market Rents and payments standards and that there are situations where the resident may be asked to pay more than 30% of their monthly adjusted income for rent, unlike the more stable rent expectations in the RAD unit. Finally, it is a best practice that the PHA refer the resident to available housing mobility counseling services, if available ([see section 11 for details](#)).

³⁷ 24 CFR § 982.301

³⁸ 24 CFR § 982.301

³⁹ 24 CFR § 982.301

Final Steps to Complete the Transition to the HCV program

It is a best practice for PHAs to provide a checklist or other notice to residents who have successfully found a unit using a Choice-Mobility voucher to ensure that they know what steps may need to be completed before leaving the RAD property. Important things to highlight for families making a transition to an HCV may include the following:

1. continue to pay current rent on time;
2. send a notice of intent to vacate to a property manager in accordance with the lease (required after PHA approval of the voucher unit or provided subject to approval of the voucher unit);
3. attending a move-out inspection;
4. pay all outstanding debts to the property owner (including establishing a repayment agreement if necessary); and
5. return keys to the current property manager.

PHAs are also encouraged to let residents know that they cannot receive assistance from two programs at the same time. Furthermore, PHAs may inform families that the Request for Tenancy Approval cannot be processed until an inspection of the unit has been completed and other requirements have been met and that they must move from a RAD property before the Choice-Mobility voucher can be used to pay for a new unit. Finally, it is a best practice that the owner/manager of the RAD property assist in the transition, permitting the resident to leave when the HCV unit is ready for occupancy.



11. Maximizing the Effectiveness of Choice-Mobility

HUD coined the term “Choice-Mobility” to highlight the new opportunities residents in RAD developments have been given to move to a neighborhood or community of their “choice.” The term “mobility” refers to decades-long efforts by HUD to expand access to higher-opportunity, low poverty neighborhoods for HCV families.

For PHAs that are committed to helping residents expand their housing opportunities through Choice-Mobility, this section will lay out a series of policy actions PHAs are able to undertake without HUD approval. Expanding options for families outside of segregated neighborhoods, and reducing the geographic concentration of HCV families overall, can help to fulfill the PHA’s statutory obligation to affirmatively furthering fair housing.

PHAs can support residents in RAD projects in their housing search process by giving them early and regular notices of their Choice-Mobility rights ([see chapter 9 above](#)), by adopting a Choice-Mobility request form and intake process that support families’ choices, by referring families to credit counseling services where needed, and by adopting basic mobility-friendly policies like exception payment standards based on Small Area FMRs (fair market rents) in higher cost neighborhoods. Ultimately, if resources are available PHAs could consider adopting an individualized case management type system for families requesting Choice-Mobility similar to the approach used in Family Self-sufficiency and housing mobility programs.

The Choice-Mobility Notice

This guide includes a sample Choice-Mobility Notice ([see section 12.1](#)) that PHAs can use to inform residents that their voucher gives them the right to move to an affordable apartment anywhere in the region, or even beyond, and explaining the advantages of a move to a low poverty neighborhood (these basic points are consistent with HUD’s Portability Rule, 24 CFR §982.301). The Notice also explains eligibility criteria, the Choice-Mobility request process, Choice-Mobility Priority List and turnover cap policies, procedures for transitioning from RAD to a voucher, the right of families to time their housing search consistent with their needs, and the right of families to remain in their current unit if their housing search is unsuccessful.

The Choice-Mobility Request and intake process

The recommended Choice-Mobility Request Form ([see section 12.2](#)) gives residents the default option of requesting a voucher according to the automatic priority they are afforded in the issuance of turnover vouchers. The request form, mirroring the Notice, could also remind the resident of the geographic range of choices, the advantages of choosing a low poverty neighborhood, and the range of rent caps available in different neighborhoods. To maximize resident empowerment, it is advisable that the form also ask residents what neighborhoods or communities they are considering searching in.

During the intake process, it is a best practice that residents be reminded of all of these points, and if the PHA provides access to any lists of available apartments, they are also required to provide listings in lower poverty areas (24 CFR §982.301).

Other PHA policies supporting Choice-Mobility

The most important step PHAs can take to expand choice is to adopt exception payment standards in selected higher opportunity, low poverty neighborhoods. The easiest way to accomplish this is to set payment standards at 110% of the SAFMR in selected ZIP Codes that are ranked “high” or “very” high on an empirically derived “opportunity index”⁴⁰ (alternatively, the PHA can select “low poverty” ZIP Codes as the appropriate metric). As per the HUD regulations, no HUD approval is required to adopt payment standards up to 110 percent of the SAFMR—a simple email to SAFMRs@hud.gov is all that is required.⁴¹ If there are relatively few voucher families already living in these zip codes, the financial impact of this change will be minimal.

Another important policy for PHAs to consider is automatically extending search times when residents are searching in higher opportunity neighborhoods. This policy recognizes the relatively greater difficulty of finding housing in those neighborhoods and can help to ease the time constraints that residents experience when looking for a unit.

Similarly, prioritizing inspections and processing of RFTAs in higher opportunity neighborhoods is a key strategy to expand landlord acceptance of vouchers in these neighborhoods, where competition from the private market is high.

⁴⁰For example, the “Child Opportunity Index” developed by DiversityDataKids or the “Opportunity Atlas” developed by Opportunity Insights.

⁴¹“Establishing a More Effective Fair Market Rent System; Using Small Area Fair Market Rents in the HCV Program Instead of the Current 50th Percentile FMRs,” 81 Fed. Reg. 80567 (November 16, 2016), <https://www.federalregister.gov/documents/2016/11/16/2016-27114/establishing-a-more-effective-fair-market-rent-system-using-small-area-fair-market-rents-in-the>; See generally, “A Guide to Small Area Fair Market Rents (SAFMRs): How State and Local Housing Agencies Can Expand Opportunity for Families in All Metro Areas” (CBPP/PRRAC 2018), <https://www.cbpp.org/sites/default/files/atoms/files/5-4-18hou.pdf>.

If a PHA is in a jurisdiction with “source of income” discrimination laws protecting families with vouchers (it is estimated that approximately half of HCV families are covered by these laws⁴²), it is important to ensure that all families have access to basic complaint forms, receive briefings on fair housing law, and referral information to the local fair housing organizations. PHAs are encouraged to also document landlord refusals to rent (and discriminatory advertisements) and share this information with local fair housing organizations to enhance testing and enforcement of these laws.

A strong program of landlord outreach and incentives is particularly important in securing access to rentals in lower poverty, high opportunity neighborhoods. It is a best practice that PHAs take steps to address other barriers to renting in these areas, such as security deposits. A number of PHAs have taken advantage of COVID-related funding and waivers to help residents cover upfront costs, as well as promoting related landlord incentives like holding fees and signing bonuses.⁴³

Urban PHAs facing restrictive state laws limiting PHA area of operation to local municipal boundaries are encouraged to consider entering into mutual agreements with suburban PHAs permitting reciprocal administration of vouchers across municipal lines. These kinds of agreements are permitted in many states and are becoming increasingly common.

Finally, comprehensive housing mobility services have been shown to make a huge difference to families interested in moving to higher opportunity areas⁴⁴. These services can include counseling workshops, neighborhood tours and other housing search assistance, and post-move assistance to help residents settle into new neighborhoods. Although most non-MTW PHAs may have limited funds for housing mobility efforts, Congress has provided some funding for a Housing Mobility Demonstration and PHAs are encouraged to take advantage of this and any future funding opportunities to support families’ effective use of tenant-based assistance.

⁴²See <https://www.prrac.org/pdf/AppendixB.pdf>.

⁴³See <https://www.hudexchange.info/resource/6314/hcv-landlord-strategy-guidebook/>

⁴⁴See here for details: <https://opportunityinsights.org/paper/cmtol/>



12. Appendix: Supplementary information

12.1 Sample Notice / Informational Document to RAD Residents of Choice-Mobility Right

Choice-Mobility Information Sheet

A. Choice-Mobility Right

As a resident in a Rental Assistance Demonstration (RAD) property, one of the rights you have under the program is called “Choice-Mobility”. Choice-Mobility gives families living at a *[PHA]* RAD property the special opportunity to request a Housing Choice Voucher that you can use to move into the private rental market.

B. Eligibility for Choice-Mobility

Under the *[PHA specify either PBV or PBRA]* program, all residents may request a Housing Choice Voucher after living in a RAD property for *[PHA specify: 1 year if PBV, 24 months if PBRA]*.

C. How do Housing Choice Vouchers Work?

With Housing Choice Vouchers, you can choose to rent a unit in the private market with HUD assistance. Generally, if the rent for the unit is reasonable and an inspection of the unit shows that the unit meets HUD’s housing quality standards, *[PHA]* will approve the unit and you can sign the lease and move into the unit. You will pay about 30% of your income for rent, minus a “utility allowance” used by *[PHA]*, and *[PHA]* will pay the rest of the rent for the unit. You will also be responsible for any utilities not included in your monthly rent. These utilities may include water, trash, and heat.

D. Requesting Choice-Mobility

If you have lived in your unit for *[1 year if PBV, 24 months if PBRA]* and would like to request a Housing Choice Voucher, please obtain a Choice-Mobility request form from *[PHA supply this information]* and submit it to *[PHA supply this information]*. The request must be submitted by the Head or Co-Head of Household.

Once your request is received, *[PHA or property manager/owner]* will confirm whether you have lived in the property for the length of time required to be eligible. If you are eligible, you will either be issued a voucher if *[PHA]* has one available or you will be notified that you have been placed on a Choice Mobility Priority List. The acknowledgement letter will provide you any available information about the wait time to expect.

E. *[PHA]* Choice-Mobility Priority List

Housing Choice Vouchers are subject to availability. If a voucher is unavailable, you will be placed on the Choice-Mobility Priority List. Residents exercising their Choice-Mobility rights will receive highest priority when *[PHA]* is able to issue additional vouchers.

[Optional text about turnover voucher cap for RAD PBV and RAD PBRA, if pertinent]: *[PHA]* may establish certain limits to the number of vouchers it provides annually for Choice-Mobility that could cause you to have to wait longer for a voucher. Under RAD program guidelines, the number of Choice-Mobility vouchers issued cannot exceed *[X]*% of the available vouchers. For example, if there were 100 vouchers available, only X vouchers would be available to RAD residents who requested them.

[Optional text about project turnover cap for RAD PBRA, if pertinent]: *[PHA]* and *[Project owner]* may establish certain limits to the number of vouchers it provides annually for Choice-Mobility in *[project]* that could cause you to have to wait longer for a voucher. Under RAD program guidelines, the number of Choice-Mobility

vouchers issued cannot exceed *[X]*% of the assisted units in *[project]*. For example, if there were 100 assisted units in *[project]*, only X vouchers would be available to RAD residents who requested them.

F. Your right to remain in your RAD unit

If you receive a Choice-Mobility voucher but do not succeed in leasing a rental unit on the open market, you retain the right to stay in your current unit so long as you have not yet provided notice to vacate to the owner. You should not file a notice to vacate until you have confirmed a voucher unit. This ability to stay in your RAD unit eases the pressure to take any available unit you can find instead of a unit of your choice that meets your needs. You can request another Choice-Mobility voucher later.

A best practice is for *[PHA]* to clearly inform you throughout the Choice-Mobility process that you may stay in your current RAD unit while you search for housing and may stay even if your housing search fails. *[PHA]* is prohibited from requiring you to provide notice to vacate any earlier than the time required by the lease. It is a best practice for owners' leases to require only a short period of notice to vacate and to allow you to rescind your notice to vacate or to find an alternative housing option if you have been unable to lease another unit using Choice Mobility.

G. Where you can live with a Housing Choice Voucher

With a Housing Choice Voucher, you may rent a unit within *[PHA]*'s jurisdiction, or you may choose to rent a unit in a jurisdiction that is covered by a different public housing authority that operates a Housing Choice Voucher program. The ability to rent outside of *[PHA]*'s jurisdiction is called portability. This means that you request a Housing Choice Voucher from *[PHA]* and request that your Housing Choice Voucher be transferred, and then you work with the PHA of your choice to get approval of the unit. When choosing a new place to live with a Housing Choice Voucher, you can think about things like the quality of schools for your children, access to public transportation, and ability to get to and from places of work.

H. Steps to transition from RAD to a Housing Choice Voucher

Once you have found a unit using a voucher, there are several final steps you will need to complete to finalize the transition to the Housing Choice Voucher program. Before leaving your current RAD unit, you will need to:

1. continue to pay your rent on time;
2. send a notice of intent to vacate the unit to a property manager, after *[PHA]* approves the new unit;
3. attend a move-out inspection;
4. pay all outstanding debts to the property owner;
5. turn in keys to your current property manager.

In addition, keep in mind that you must move out from your unit before the Housing Choice Voucher can be used to pay your new landlord, but you should not move until the PHA has approved the new unit.

12.2 Sample Choice-Mobility Request Form

Choice-Mobility Voucher Request Form

Date: _____ Client Number: _____

Head of Household Full Name (Print): _____

Property Name: _____

Present Address: _____

I certify the following:

1. I have lived in my current RAD unit for at least *[1 year (PBV)/24 months (PBRA)]*.
2. Until a voucher is issued, a new unit located and approved, and I move out of my current unit, I will continue to pay rent and comply with all terms of the current lease.
3. I have received the Choice-Mobility Information Sheet from *[PHA / Property Manager or Owner]*.
4. I understand that my name will be placed on *[PHA's]* Choice-Mobility Priority List if vouchers are unavailable.
5. I understand that I am permitted to use the tenant-based voucher to rent a unit in *[PHA]*'s jurisdiction or in another part of the country where a different PHA operates an HCV program.

HOH or Co-HOH Signature

Date

HCV Office Only

Date Received: _____

Date Acknowledgment Letter Sent: _____

Date of RAD conversion: _____

Date of move-in for above client: _____ Eligible? y / n

Admission Office Representative Signature: _____

12.3 Acknowledgment of Choice-Mobility Voucher Request (Letter to be used when tenant is confirmed to be eligible and PHA is unable to issue voucher immediately)

Acknowledgment of Voucher Request

NAME

DATE

ADDRESS

CLIENT NO

CITY, ST, ZIP

Dear [CLIENT NAME]:

This letter is to inform you that we have received your request to receive a Choice-Mobility voucher. Your name has been placed on the Choice-Mobility Priority List.

There are several things to remember about Choice-Mobility vouchers:

- [PHA] will select your name off of the Choice-Mobility Priority List based on the order in which the requests were received. Names are drawn from the Priority List whenever turnover vouchers are available. There are currently [X] families on the Choice-Mobility Priority List, and over the past three months the average wait time has been [Y]. Residents do have automatic priority in the issuance of vouchers that become available to [PHA], which means families on the Choice-Mobility Priority List are always considered first, [up to a cap that PHA has adopted]. RAD residents do not have priority over non-RAD PBV residents moving with continued assistance.
- When your name is drawn from the list, you will be contacted by [PHA] staff and asked if you are ready to accept the voucher at that time.
- [Optional text for PHA implementing turnover voucher inventory cap at RAD properties]: [PHA] has established limits to the number of vouchers it provides annually for Choice-Mobility. Under RAD program guidelines, the number of Choice-Mobility vouchers issued cannot exceed [X%] of the available vouchers. For example, if there were 100 vouchers available, only [X] vouchers would be available to RAD residents who requested them.
- [Optional text for PHA and project owner implementing project turnover cap at RAD properties]: [PHA] and [Project owner] has established limits to the number of vouchers it provides annually for Choice-Mobility in [project]. Under RAD program guidelines, the number of Choice-Mobility vouchers issued cannot exceed [X]% of the assisted units in [project]. For example, if there were 100 assisted units in [project], only X vouchers would be available to RAD residents who requested them.
- If you receive a Choice-Mobility voucher but do not succeed in leasing a rental unit on the open market, you retain the right to stay in your current unit so long as you have not yet provided notice to vacate to the owner. You should not file a notice to vacate until you have confirmed a voucher unit. This ability to stay in your RAD unit eases the pressure to take any available unit you can find instead of a unit of your choice that meets your needs. You can request another Choice-Mobility voucher later.

A best practice is for [PHA] to clearly inform you throughout the Choice-Mobility process that you may stay in your current RAD unit while you search for housing and may stay even if your housing

search fails. [PHA] is prohibited from requiring you to provide notice to vacate any earlier than the time required by the lease. It is a best practice for owners' leases to require only a short period of notice to vacate and to allow you to rescind your notice to vacate or to find an alternative housing option if you have been unable to lease another unit using Choice Mobility.

While you are on the Choice-Mobility Priority List, you can do the following:

- Prepare a plan for how you will pay for the costs of moving (security deposits, pet deposits, application fees, moving expenses, etc.).
- Review your credit history and rental history and if necessary, seek assistance to repair that history. Many landlords review this information before approving rentals. You may also need a plan to pay off any current utility debt.
- Consider what neighborhoods would provide the best opportunities for you and your family.

If you have additional questions, please contact [PHA] at [Phone number].

Sincerely,

[PHA]

12.4 Sample Choice-Mobility Meeting Agenda

Sample Meeting Agenda

- **Choice-Mobility Overview**

- » What is Choice-Mobility?
- » When are RAD residents eligible for Choice-Mobility?
 - Eligibility based on period of occupancy at the property.
- » C-M is an optional resident right, and families have a right to remain.

- **Benefits of Choice-Mobility**

- **Choice-Mobility Request Process**

- » Where do residents get request forms?
- » Where should I submit a form?
- » Can request at any point after eligible, and re-request if fail to use voucher
- » You will be reminded at annual appointments
- » Choice-Mobility Priority lists
 - When will I get a voucher?
 - Voucher caps (if pertinent)
 - Number of families currently on Choice-Mobility Priority List (if available).

- **Housing Choice Voucher (HCV) Overview**

- » How does the HCV program work and how it is different from project-based assistance?
- » Where can I use the voucher?
- » What will I pay in rent?
- » How do I find places that will take vouchers?
- » What if a landlord refuses to take a voucher? (for jurisdictions with source of income protections)

- **Conducting a Housing Search**

- » Where to look for housing
- » How long does a housing search take?

- **Moving with a voucher**

- » Transitioning from RAD to the HCV program

- **Q&A**

12.5 Sample Checklist for PHA Staff

Checklist for Choice-Mobility

Tasks

Choice-Mobility Planning

- Develop Choice-Mobility procedures and policies (resource: attached Choice-Mobility plan template)
- Determine whether a turnover cap will be instituted
- Send and sign letter of agreement for RAD PBRA properties (Required)
- Train property managers and other frontline staff on Choice-Mobility procedures

Notifying residents

- Include information on the resident's ability to request and move with a Choice-Mobility voucher in the RAD Information Notice (RIN) provided to residents of public housing projects proposed for conversion
- Create Choice-Mobility information sheet, FAQs, flyers, and other documents that will be used to notify residents. Ensure that notices meet accessibility and LEP requirements
- Create and maintain Choice-Mobility information webpage
- Provide Choice-Mobility information sheet to residents in properties that will be converted, both before and after conversion. Hold meetings specifically about Choice-Mobility before and after conversion
- Distribute Choice-Mobility information sheet to new RAD residents at lease signing, and at annual re-certification
- Provide written and oral information about Choice-Mobility at resident meetings at least twice per year
- Establish automatic mailers or notifications that residents would receive 4 months prior to when they first become eligible for a Choice-Mobility voucher
- Provide eligible residents with Choice-Mobility request form
- Provide RAD residents with current information on length of Choice-Mobility Priority List and average wait time using quarterly data.

Processing Choice-Mobility Requests

- Assign responsibility and adopt standard forms to notify residents that their request has been received.
- Hold voucher orientation meeting for approved Choice-Mobility residents (Required)
- Notify residents of placement on Choice-Mobility Priority List (if applicable)

Maximizing the Effectiveness of Choice-Mobility

Conduct landlord outreach

Provide listings of available apartments (if PHA collects this information), including in low-poverty areas (Required)

Transitioning Residents to HCV

Collect notice of intent to vacate from residents moving with a Choice-Mobility voucher, once the new unit has been approved by the PHA

Conduct move-out inspection

Ensure residents moving out have repaid all required expenses or have entered into a repayment agreement

Coordinate PBV/PBRA move-out and voucher start dates

12.6 Choice-Mobility Letter of Agreement — PBRA developments

Letter of Agreement

GOVERNING MUTUAL OBLIGATIONS TO EFFECTUATE CHOICE-MOBILITY RIGHTS OF RESIDENTS IN PROPERTY CONVERTED UNDER HUD'S RENTAL ASSISTANCE DEMONSTRATION

This **AGREEMENT** is entered into as of this _____ day of _____, 2022, by and between _____, a limited partnership, (the “**Owner**”) and the _____ **Housing Authority**, a public body corporate and politic, created under the laws of the State of _____ (“**PHA**”).

RECITALS

WHEREAS, the PHA's public housing development formerly known as “_____” (hereinafter, “the converted housing development”) is in the process of converting assistance to funding with Project Based Rental Assistance (PBRA) through the Rental Assistance Demonstration (RAD);

WHEREAS, residents of the converted housing development (hereinafter “residents”) have rights, pursuant to the RAD Notice _____, to request a Housing Choice Voucher (HCV) from the PHA after the two-year minimum waiting period specified in the RAD Notice for PBRA developments and be prioritized for receipt of an HCV subject to limitation adopted herein (“Choice-Mobility”).

NOW THEREFORE, for and in consideration of the terms, conditions and covenants hereinafter set forth, the sufficiency of which is acknowledged by the parties, PHA and Owner agree as follows:

Section 1: Notification of Choice-Mobility rights and procedures

- (A)** PHA and Owner agree to cooperate to ensure that residents are aware of and able to fully exercise their Choice-Mobility rights.
- (B)** The PHA has notified or will notify residents of their Choice-Mobility rights on the following schedule:
 - prior to submitting the application to HUD in the RAD Information Notice
 - prior to submitting the application to HUD, in at least two meetings with residents
 - after issuance of the RAD Conversion Commitment and prior to closing
- (C)** The Owner will notify residents of their Choice-Mobility rights on the following schedule:
 - for existing residents, upon the completion of renovations or reoccupancy of the development
 - for existing residents, one year after the completion of renovations or reoccupancy of the development
 - at regular income recertifications
 - » at lease signing for new residents
- (D)** All notices regarding Choice-Mobility issued by the Owner will specify the date upon which the right to exercise Choice-Mobility rights will vest and will include a copy of the Choice-Mobility Information Sheet.

(E) The Owner will provide regular access to the PHA to communicate or meet with individual residents or to participate in resident meetings; PHA agrees to join briefings on Choice-Mobility upon the reasonable advance request of the Owner.

Section 2: Assistance with the Choice-Mobility request process

Owner will make Choice-Mobility request forms available to all residents, both in hard copy and online.

Owner will accept Choice-Mobility requests and transmit copies of all completed forms to the PHA within two days; Owner will assist residents with their requests if needed.

-OR-

Owner will establish a system for Choice-Mobility requests to be submitted directly to the PHA

Section 3: Facilitating the transition from PBRA lease to HCV lease

The Owner acknowledges that any resident who applies for Choice-Mobility shall retain their lease and all of their rights as a tenant until such time as they move into an HCV unit approved by the PHA; Owner will terminate the lease only when the resident moves into an HCV unit, and PHA and Owner agree to coordinate the timing of the move so as to avoid overlapping leases and HAPs. The resident shall not be charged any penalty for termination of their lease.

Section 4: Resident retention of right to remain in PBRA unit until successful move-in

If a resident applies for the Choice-Mobility option and is unsuccessful in identifying a unit to move to, they will continue to be a tenant in good standing in their current unit.

Section 5. Default by Owner

If Owner fails to implement the requirements of this Agreement after 30 days' written notice from PHA of such failure to do so, or Owner has received two (2) written notices of Default from PHA in any one-year period and Owner has failed to undertake reasonable efforts to rectify such Default within 30 days' after written notice thereof from PHA, Owner agrees that _____.

Section 6. Default by PHA

If PHA fails to implement the requirements of this Agreement after 30 days' written notice from Owner of such failure to do so, or PHA has received two (2) written notices of Default from PHA in any one-year period and PHA has failed to undertake reasonable efforts to rectify such Default within 30 days' after written notice thereof from Owner, PHA agrees that _____.

Section 7. Miscellaneous.

(A) Notices. Except as otherwise provided in Sections 2, 3 and 4 above, any demand for compliance with the terms of this Agreement or Notice of Default required or permitted by this Agreement to be given or delivered to either party shall be deemed to have been received when personally delivered, with signed receipt, sent by commercial overnight courier which requires a signed receipt upon delivery, or transmitted by telecopy or facsimile transmission (which shall be immediately confirmed by telephone and shall be followed by mailing an original of the same within 24 hours after such transmission)

- (B)** Any other communication that is contemplated or required to be transmitted pursuant to this Agreement by e-mail may be directed to the applicable e-mail address identified below, or such other e-mail address provided by the applicable addressee.
- (C) Severability; Entire Agreement.** This Agreement contains the complete and entire agreement among the parties as to the matters covered, rights granted, and the obligations assumed and may not be contradicted by evidence of prior, contemporaneous, or subsequent oral agreements. There are no unwritten oral agreements between the parties.
- (D) Binding Agreement.** This Agreement shall be binding upon, and shall inure to the benefit of, the parties hereto and their respective successors and permitted assigns. The terms of this Agreement may not be waived, modified or changed in any way by implication, correspondence or otherwise unless such waiver, modification or change is made in the form of a written amendment to this Agreement signed by both parties. Owner shall not assign or transfer the Agreement without the prior written consent of PHA, which shall not be unreasonably withheld, conditioned, delayed or denied. Any attempted assignment or transfer without such consent shall be void.
- (E) Applicable Law and Venue.** The laws of the State of _____ shall strictly and absolutely govern the rights and obligations of parties to this Agreement, and the interpretation and construction and enforceability thereof and any and all issues relating to the transactions contemplated herein and therein. Owner and PHA consent to the jurisdiction of the courts of the State of _____, including the jurisdiction of the United States District Court for the District of _____ (to the extent diversity of citizenship or other jurisdictional basis exists) and if suit is filed to enforce, interpret, or construe this Agreement, Owner and PHA agree to submit to the exclusive jurisdiction of any state or federal court located in the State of _____, and waive any jurisdiction, venue or inconvenient forum objections to such court.
- (F) Term.** This Agreement shall automatically terminate and be of no further force or effect (i) when the HAP Contract expires or terminates in accordance with its terms, or (ii) at such other time mutually agreed upon in writing by PHA and Owner.
- (G) Counterparts.** This Agreement may be executed in two or more counterparts, with facsimile signature, each of which shall have the force and effect of any original, and all of which shall constitute but one document:

RAD Choice Mobility Guidebook

IN WITNESS WHEREOF, PHA and Owner have caused this Agreement to be duly executed and delivered on and as of the date first set forth above.

OWNER: _____

DATE: _____

NAME/TITLE _____

MAILING ADDRESS: _____

EMAIL ADDRESS: _____

PHA: _____

DATE: _____

NAME/TITLE _____

MAILING ADDRESS: _____

EMAIL ADDRESS: _____

WITNESS/ATTEST:

By: _____ (SEAL)

Approved as to form and legal sufficiency:

12.7 PBV Choice-Mobility Plan Template (Addendum to PHA Plan and Housing Choice Voucher Administrative Plan)

Implementation of resident Choice-Mobility rights in RAD PBV developments

All existing residents of properties converted under the Rental Assistance Demonstration (RAD) using Project-based Vouchers (PBVs) have a right to request a tenant-based Housing Choice Voucher (HCV). This document sets out housing authority's policies and procedures for implementing these Choice-Mobility rights.

A. Statement of resident Choice-Mobility rights

1. Residents of RAD properties may obtain a Housing Choice Voucher the later of one year from the effective date of the HAP contract or one year after the move-in date.
2. Residents retain the right to request a Housing Choice Voucher at any point after the first year of occupancy for as long as they live at the property.
3. If an eligible resident receives a Choice-Mobility voucher but does not succeed in leasing a rental unit on the open market, they retain the right to stay in their current unit so long as the resident has not yet provided notice to vacate to the owner.
4. Eligible residents of a RAD PBV property who request a Housing Choice Voucher have priority to receive a Housing Choice Voucher *[up to a cap]*.

B. Notice to residents

1. *[PHA]* will give plain language notice (attached) to all residents of Choice-Mobility rights and procedures at multiple points in time of the RAD conversion, including at closing/conversion of the RAD property, at the RAD lease signing, and four months prior to when they first become eligible for a voucher, as well as written and oral notice at any resident meetings. After the first year, notice will also be provided to all existing residents at least annually, including at recertification, and to new residents as part of their initial briefing.
2. *[PHA]* will maintain a plain language webpage explaining Choice-Mobility, including prominent links to this policy, PDF of the plain language notice, and a Choice-Mobility voucher request form that can be either printed or filled out online.
3. *[PHA]* will offer in person meetings at least twice a year with RAD residents to explain the Choice-Mobility option, and to provide access to training opportunities set out in section D.1 below.
4. All notices, request forms and web-based materials on Choice-Mobility (as well as any other communications with residents concerning Choice-Mobility) will be translated and made available in other languages pursuant to HUD's LEP requirements and *[PHA]*'s language access plan (if one has been developed). This same information will also be effectively communicated to persons with disabilities.

C. Processing Choice-Mobility requests

1. [PHA] will provide a plain language Choice-Mobility request form (attached) to any resident who asks for one. [PHA] will provide clear guidance to the resident regarding how to obtain a request form and the process for submitting it.
2. Any resident who satisfies the one-year waiting period is eligible to request a Housing Choice Voucher; no additional screening is required.
3. Once a request is received, [PHA] will confirm whether the resident has lived in the property for the period required to be eligible. If the resident is eligible, they will either be issued a voucher if [PHA] has one available or will be notified that they have been placed on a Choice-Mobility Priority List in the order that requests were received. [PHA] will send the resident an acknowledgment of the receipt of the request and placement onto the list. [PHA] will promptly issue the next available voucher for residents on the list.
4. When a resident reaches the top of the Choice-Mobility Priority List and the PHA has an available turnover voucher, the [PHA] will promptly schedule a meeting with them. At the meeting, [PHA] staff will explain how the Housing Choice Voucher program works, schedule when the voucher will be issued, and go over the basic requirements of the HUD portability rule (explaining the benefits of living in a low poverty area, explaining the PHA's area of operation and the resident's portability rights, and providing access to apartment listings that include lower poverty neighborhoods, etc.), and [PHA] will refer the resident to housing mobility counseling services, if available. [PHA] will also explain the steps that residents must complete when making the transition from the PBV to the HCV program and will coordinate between departments to facilitate the transition.
5. *[Optional provision for PHAs that implement turnover voucher inventory cap:]* Given that, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by [PHA] exceeds 20 percent of [PHA's] authorized units under its HCV ACC with HUD, [PHA] is voluntarily choosing to adopt a voucher inventory turnover cap. [PHA] is not required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. *[PHA insert specific information about limitation the PHA has adopted here.]* [PHA] will create and maintain a Priority List in the order in which the requests from eligible households were received.
6. Choice-Mobility HCV families will have the same rights to extend their search times as any other HCV family, but if they fail to find a unit within the maximum allowable search time, they will retain all of their rights as a resident in the RAD property.
7. Residents who receive a voucher but fail to use it may request again, if they are still living in the RAD property.

D. Maximizing the potential of Choice-Mobility

1. Experience with housing mobility programs around the country has shown that advance preparation and training expands the ability of families with Housing Choice Vouchers to access units in high opportunity areas. To improve the success of families who may be interested in Choice-Mobility, [PHA] will offer all interested residents in RAD properties access to training sessions on financial management/credit repair, basics of conducting a housing search and applying for private housing, and fair housing/landlord-resident rights.
2. Housing search time limits can greatly affect the ability of families to use a voucher, especially in harder-to-rent areas. To increase the chances of securing housing, [PHA] will approve requests to expand search times.
3. Comprehensive housing mobility services have been shown to significantly expand access to lower poverty, high opportunity communities for families with Housing Choice Vouchers. Although [PHA] does not currently have funding for comprehensive mobility services, we will apply for funding for such services as soon as funding becomes available from HUD. In the meantime, [PHA] will provide the following assistance to RAD residents who request Choice-Mobility:
 - a. Provide all information required by HUD's portability rule to all HCV families.
 - b. On a weekly basis, scan rental listings for available units in low poverty neighborhoods in the housing market that are within the HCV payment standards, and disseminate listings to HCV families searching for units.
 - c. *[Optional]:* Funds permitting, PHA will also provide *[insert security deposit, moving fees or other expenses authorized by Notice PIH 2022-18(HA)]*.

12.8 PBRA Choice-Mobility Plan Template (Addendum to PHA Plan and Housing Choice Voucher Administrative Plan)

Implementation of resident Choice-Mobility rights in RAD PBRA developments

All existing residents of properties converted under the Rental Assistance Demonstration (RAD) using Project-based Rental Assistance (PBRA) have a right to request a tenant-based Housing Choice Voucher (HCV). This document sets out housing authority's policies and procedures for implementing these Choice-Mobility rights.

A. Statement of resident Choice-Mobility rights

1. Residents of RAD properties may obtain a Housing Choice Voucher the later of 24 months from the effective date of the HAP contract or 24 months after the move-in date.
2. Residents retain the right to request a Housing Choice Voucher at any point after 24 months of occupancy for as long as they live at the property.
3. If an eligible resident receives a Choice-Mobility voucher but does not succeed in leasing a rental unit on the open market, they retain the right to stay in their current unit so long as the resident has not yet provided notice to vacate to the owner.
4. Eligible residents who request a Housing Choice Voucher have priority, along with residents of the PHA's PBV projects, to receive a Housing Choice Voucher, except as limited by any cap described below.

B. Notice to residents

1. [PHA] will give plain language notice (attached) to all residents of Choice-Mobility rights and procedures at multiple points in time of the RAD conversion, including at closing/conversion of the RAD property, as well as written and oral notice at any resident meetings. The property owner will provide the plain language notice to residents at the RAD lease signing and four months prior to when they first become eligible for a voucher. After the first year, the property owner will provide the notice to all existing residents at least annually, including at recertification, and to new residents as part of their initial briefing.
2. [PHA] will maintain a plain language webpage explaining Choice-Mobility, including prominent links to this policy, PDF of the plain language notice, and a Choice-Mobility voucher request form that can be either printed or filled out online.
3. [PHA] will offer in person meetings at least twice a year with RAD residents to explain the Choice-Mobility option, and to provide access to training opportunities set out in section D.1 below.
4. All notices, request forms and web-based materials on Choice-Mobility (as well as any other communications with residents concerning Choice-Mobility) will be translated and made available in other languages pursuant to HUD's LEP requirements and [PHA]'s language access plan (if one has been developed). This same information will also be effectively communicated to persons with disabilities.

C. Processing Choice-Mobility requests

1. [PHA] will provide a plain language request form (attached) to any resident who asks for one. [PHA] will provide clear guidance to the resident regarding how to obtain a request form and the process for submitting it.
2. Any resident who satisfies the 24-month waiting period is eligible to request a Housing Choice Voucher.
3. Once a request is received, [PHA] will confirm whether the resident has lived in the property for the period required to be eligible. If the resident is eligible, they will either be placed on the HCV program waitlist and issued a voucher if [PHA] has one available or will be notified that they have been placed on a Choice-Mobility Priority List in the order that requests were received. [PHA] will send the resident an acknowledgment of the receipt of the request and placement onto the list. [PHA] will promptly issue the next available voucher for residents on the list. Note, however, that in the case of PBRA the resident must be on both the HCV program waitlist and the Choice-Mobility Priority List if the lists are separate; this is because PBRA residents must be newly admitted to the HCV program from the waitlist (unlike PBV residents, who are not new admissions upon accepting a tenant-based HCV).
4. When a resident reaches the top of the Choice-Mobility Priority List and the PHA has an available turnover voucher, [PHA] will promptly schedule a meeting with them. At the meeting, [PHA] staff will explain how the Housing Choice Voucher program works, schedule when the voucher will be issued, and go over the basic requirements of the HUD portability rule (explaining the benefits of living in a low poverty area, explaining the PHA's area of operation and the resident's portability rights, and providing access to apartment listings that include lower poverty neighborhoods, etc.), and [PHA] should refer the resident to available housing mobility counseling services, if available. [PHA] should also explain the steps that residents must complete when making the transition from the PBRA to the HCV program and will coordinate between departments to facilitate the transition.
5. *[Optional provision for PHAs that implement turnover voucher inventory cap:]* [PHA] is voluntarily choosing to adopt a turnover voucher inventory cap. [PHA] is not required, in any year, to provide more than one-third of its turnover vouchers to residents of Covered Projects. *[PHA insert specific information about limitation the PHA has adopted here.]* [PHA] will create and maintain a Choice-Mobility Priority List in the order in which the requests from eligible households were received.
6. *[Optional provision for project owner and PHAs that implement a project turnover cap:]* [PHA] is voluntarily choosing to adopt a project turnover cap for *[project(s)]*. *[Project owner]* and [PHA] agree to limit the number of Choice-Mobility moves exercised by eligible households to 15 percent of the assisted units in *[project(s)]*. *[PHA and project owner insert specific information about limitation the PHA has adopted here.]* [PHA] will create and maintain a Choice-Mobility Priority List in the order in which the requests from eligible households were received.
7. Choice-Mobility HCV families will have the same rights to extend their search times as any other HCV family, but if they fail to find a unit within the maximum allowable search time, they will retain all their rights as a resident in the RAD property.

8. Residents who receive a voucher but fail to use it may request again, if they are still living in the RAD property.
9. [PHA] must maintain a written agreement with the project owner describing how the Choice-Mobility option will be administered and the process by which households may request a voucher.

D. Maximizing the potential of Choice-Mobility

1. Experience with housing mobility programs around the country has shown that advance preparation and training expands the ability of families with Housing Choice Vouchers to access units in high opportunity areas. To improve the success of families who may be interested in Choice-Mobility, [PHA] will offer all interested residents in RAD properties access to training sessions on financial management/credit repair, basics of conducting a housing search and applying for private housing, and fair housing/landlord-resident rights.
2. Housing search time limits can greatly affect the ability of families to use a voucher, especially in harder-to-rent areas. To increase the chances of securing housing, [PHA] will approve requests to expand search times.
3. Comprehensive housing mobility services have been shown to significantly expand access to lower poverty, high opportunity communities for families with Housing Choice Vouchers. Although [PHA] does not currently have funding for comprehensive mobility services, we will apply for funding for such services as soon as funding becomes available from HUD. In the meantime, [PHA] will provide the following assistance to RAD residents who request Choice-Mobility:
 - a. Provide all information required by HUD's portability rule to all HCV families.
 - b. On a weekly basis, scan rental listings for available units in low poverty neighborhoods in the housing market that are within the HCV payment standards, and disseminate listings to HCV families searching for units.
 - c. [Optional]: Funds permitting, PHA will also provide *[insert security deposit, moving fees or other expenses authorized by Notice PIH 2022-18(HA)]*.