

**FY  
2019**

# Moving to Work (MTW) Annual Plan

The Orlando Housing Authority

Submitted January 16, 2018  
OHA Executive Office  
April 1, 2018 through March 31, 2019



# FY2019 Moving to Work (MTW) Annual Plan

April 1, 2018 – March 31, 2019

## Table of Contents

## PAGE

### **Section I: Introduction**

**3-8**

#### **A. Overview of OHA's Short-Term and Long-Term Goals and Objectives**

**4-8**

MTW Activities

4-5

Non-MTW Activities

5-8

### **Section II: General Housing Authority Operating Information**

**10-14**

#### **A. Housing Stock Information**

**10-12**

Planned New Public Housing Units to be Added During the Fiscal Year

10

Planned Public Housing Units to be Removed During the Fiscal Year

10

New Housing Choice Vouchers to be Project-Based During the Fiscal Year

11

Other Changes to the Housing Stock Anticipated During the Fiscal Year

11

General Description of All Planned Capital Fund Expenditures During the Plan Year

11-12

#### **B. Leasing Information**

**12-13**

Planned Number of Households Served at the End of the Fiscal Year

12

Reporting Compliance with Statutory MTW Requirements

12

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice

12-13

Vouchers and/or Local, Non-Traditional Units and Possible Solution

#### **C. Wait List Information**

**13-14**

Wait List Information Projected for the Beginning of the Fiscal Year

13

Partially Open Wait Lists

13

Local, Non-Traditional Housing Program

13

Other Wait List Types

14

Changes to the Wait List or Policy Changes Regarding the Wait List

14

### **Section III: Proposed MTW Activities**

**15-17**

Activity 13: Streamlined Public Housing Inspections

16-17

### **Section IV: Approved MTW Activities**

**18-29**

#### **A. Implemented Activities**

**19-29**

Activity 1: \$225 Rent Floor for Non-Elderly & Non-Disabled Households

19

Activity 2: Streamline the Recertification in Public Housing & Housing Choice Voucher Programs

20-21

Activity 6: Provide Up to 50 One & Two Bedroom Units & Supportive Services At West Oaks

22

Apartments

Activity 8: Project Based Vouchers in OHA Owned Units

23

Activity 9: Establishment of Agency-Wide \$100 Minimum Rent

24-25

Activity 10: Tenant-Based Voucher Homelessness Prevention Program

26

#### **B. Not Yet Implemented Activities**

**27-28**

Activity 11: Project-Based Homeownership Program

27-28

#### **C. Activities on Hold**

**28**

None

28

<b>D. Closed Out Activities</b>	<b>28-29</b>
Activity 3: Streamline the Rent Calculation Process in Public Housing & Housing Choice Voucher Programs	28
Activity 4: Consolidation of Inspection and Recertification Requirements to Establish An Inspection Process Based on Geographic Location	28
Activity 5: Supporting Up to 50 Homeowners for Six Months Each by Providing Interim Financial Assistance (vouchers) and Counseling to Prevent Foreclosures	29
Activity 7: Use of Project-Based Vouchers & Other Resources to Develop Low-Income City Donated Property for Low-Income Elderly Housing, in Conjunction with Redevelopment of Jackson Court/Division Oaks	29
Activity 12: Tenant-Based Rental Assistance Program	29
<b>Section V: Sources and Uses of Funds</b>	<b>30-33</b>
<b>A. Sources and Uses of MTW Funds</b>	<b>31-32</b>
Estimated Sources of MTW Funding for the Fiscal Year	31
Estimated Uses of MTW Funding for the Fiscal Year	32
Description of Activities that Will Use Only MTW Single Fund Flexibility	32-33
<b>B. Local Asset Management Plan</b>	<b>33</b>
Local Asset Management Plan	33
<b>Section VI: Administrative</b>	<b>34-73</b>
<b>A. Resolutions</b>	<b>35-37</b>
Certificate of Compliance	38-39
Certification of Consistency – Orange County	40
Certification of Consistency – City of Orlando	41
<b>B. Public Comment Period</b>	<b>42</b>
<b>C. Description of PHA Directed Evaluations</b>	<b>42</b>
<b>D. CFP Annual Statements/Performance &amp; Evaluations Reports</b>	<b>42-73</b>
FY2014	<b>43-47</b>
FY2015	48-52
FY2016	53-57
FY2017	58-62
<b>Capital Fund Program 5 Year Action Plan</b>	<b>63-73</b>
Part I: FY2017 - FY2021	63
Part II: FY2017 - FY2021	64-66
Part III: FY2017 - FY2021	67-73
<b>Section VII: Appendix</b>	<b>74-86</b>
<b>A. LAMP</b>	<b>75-76</b>
<b>B. Rental Assistance Demonstration (RAD) Program Significant Amendment</b>	<b>77-86</b>

# SECTION I

## INTRODUCTION

## SECTION I – INTRODUCTION

### A. Overview of the Orlando Housing Authority's (OHA) Short-Term and Long-Term Goals and Objectives

#### **MTW Activities**

As an MTW agency, the OHA is allowed flexibility to modify certain requirements in order to achieve one or more of the following MTW statutory objectives:

1. Reduce cost and achieve greater cost effectiveness in Federal expenditures;
2. Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
3. Increase housing choices for low-income families.

In general, the OHA's short term and long term goals are to continue to implement the current MTW activities and uses of funds. One of the goals of the OHA is to demolish the Lake Mann and Griffin Park developments. The OHA will submit an application to the Special Applications Center (SAC) with the intention of revitalizing those neighborhoods with innovative housing. The OHA may identify the need for changes to its ongoing MTW activities and uses of funds. If that is the case, the OHA will seek approval from HUD for any significant changes to plan activities.

All activities and uses of funds are discussed, in detail, in the plan. In FY2019, the OHA is seeking the U.S. Department of Housing and Urban Development's (HUD) approval for one proposed activity. Proposed Activity 13: Streamlined Public Housing Inspections will allow the OHA to inspect only the public housing units of those residents that are due for their triennial recertification.

The OHA has partially implemented Activity 1: \$225 Rent Floor for Non-Elderly and Non-Disabled Households. The OHA defines self-sufficiency as being able to pay the \$225 rent floor. In the past, self-sufficiency resources were only available to public housing residents. In FY2018, the OHA began offering self-sufficiency services to HCV participants that cannot pay the \$225 rent floor in phases. Self-sufficiency services through the OHA's Resource Center are now available to all residents and participants experiencing a hardship.

Activity 2: Streamline the Recertification Process in the Public Housing and Housing Choice Voucher Programs, has been fully implemented. One-third of the OHA's population takes part in a full recertification, while the remaining two-third complete an annual update.

Activity 8: Project Based Vouchers in OHA Owned Properties, has been fully implemented and is currently in an ongoing progress of placement.

Activity 9: Establishment of an Agency-Wide \$100 Minimum Rent, has been fully implemented to all public housing residents and housing choice participants to which this activity applies.

Although there has been some progress, Activity 10: Tenant-Based Voucher Homelessness Prevention Program, remains in the early stages of its development.

The OHA received HUD approval for two new activities in FY2018. Approved Activity 11: The Project-Based Homeownership Program, which is a Section 8 Project-Based Homeownership Program, begins with the development of 82 homeownership units at Carver Park. Approved Activity 12: The Tenant-Based Rental Assistance Program, was a program in which the OHA would provide funds for the first month's rent for homeless households and then receive a reimbursement from the City of Orlando. This activity was

subsequently closed out in FY2018. The OHA looks forward to the implementation of its recently approved MTW Activity 11 and the opportunity to evaluate how it assists the OHA in meeting the MTW objectives.

### **Non-MTW Activities**

The OHA administers a number of non-MTW programs. Such programs include, but are not limited to, the following:

- (1) vouchers for non-elderly persons with disabilities (NED),
- (2) HUD Veteran Affairs Supportive Housing (VASH) vouchers,
- (3) vouchers for single-room occupancy (SRO),
- (4) family unification vouchers (FUP),
- (5) resident opportunities and supportive services (ROSS),
- (6) family self-sufficiency program (FSS),
- (7) non-public housing or Housing Choice Voucher (HCV) units,
- (8) administration of the Sanford Housing Authority (SHA) by way of an interlocal agreement, and
- (9) administration of OHA vouchers in the Sanford jurisdiction

These programs are essential in their support and assistance to residents and participants that are not involved in MTW activities. For uniformity, the OHA received HUD approval to extend the MTW flexibilities it received for the housing choice voucher program to the Sanford Housing Authority (SHA) vouchers. The OHA is now able to apply the flexibilities to its Single Room Occupancy (SRO) program.

The OHA's non-public housing complexes are located at West Oaks Apartments (180 one and two bedroom units) and Antioch Manor (a project-based section 202 property consisting of 101 units for the elderly). The OHA's other non-public housing unit is the 75 unit Jackson Court/Division Oaks Development, which is owned by Orlando Properties Inc. Jackson Court is a 58 unit, 3 story senior housing apartment complex with one bedroom units only. Division Oaks is a two story, 17 unit family apartment complex.

OHA promotes  
affordable housing,  
economic opportunity,  
and a suitable living  
environment free from  
discrimination.

In addition, the OHA maintains oversight of the Carver Park HOPE VI development, which includes the Landings at Carver Park and the Villas at Carver Park. The Landings at Carver Park is 56 units of affordable housing for families (26 tax credit units and 30 tax credit/public housing hybrid units). The Villas at Carver Park is a 64 unit tax credit/public housing apartment complex for the elderly.

The OHA's long term plan for its non-MTW programs is to implement the recently approved Project-Based Voucher activity at the OHA owned sites. The OHA will also continue to manage its properties and to seek opportunities for the OHA to increase its housing portfolio such that additional affordable housing options are available to the community. In addition, the OHA is committed to improving the quality of housing provided to its residents as funding permits.

Lift Orlando, a local non-profit organization whose mission is to break the cycle of poverty through neighborhood revitalization, has partnered with the OHA to redevelop Orlando's Washington Shores community – The Communities of West Lakes. Washington Shores includes the OHA's Lake Mann Homes and Lorna Doone Apartments. Lift Orlando has embarked on the redevelopment of a significant area of blighted housing west of downtown Orlando. Demolition is underway and construction of new housing units are anticipated to be ready for occupancy in the summer of 2017. OHA intends to partner in this initiative by providing project-based vouchers for 20 units to improve affordability for low income families. The OHA and



Lift Orlando may apply for the Choice Neighborhoods Action grant for Lake Mann Homes and/or Lorna Doone Apartments.

In FY2018, the OHA may apply for HUD VASH funding for Set-Aside Funding for Project-Basing HUD-VASH Vouchers as funds become available. The VASH project based vouchers will enable homeless veterans and their families access to affordable housing with supportive services. The OHA may apply for up to 75 units (in one development) to be placed under a PBV housing assistance payment (HAP) contract.

### **Rental Assistance Demonstration Program**

In March 2015, the OHA received approval from HUD for a Rental Assistance Demonstration (RAD) Portfolio Award for the Citrus Square public housing site. The approval also provided the opportunity for the OHA to submit an application in FY2017 to convert the units located at Lorna Doone Apartment, of which the OHA did complete. In December 2015, the OHA requested an amendment to its FY2016 MTW Plan to incorporate the RAD program, which HUD approved in January 2016. The OHA will also consider the feasibility of transitioning more of its public housing properties to RAD properties.

### **Citrus Square Apartments**

Citrus Square Apartments, built in 1982, is an 87 unit, multi-family property comprising 45 buildings situated on 10 acres in east Orlando. Citrus Square has central air and heating, polypropylene siding, ceramic tile throughout and washer/dryer hook ups. The property has a basketball court, playground, city recreation and computer learning center, individual parking, an on-site manager's office and a playground. Citrus is located on a major retail/commercial corridor, minutes from the Orlando International Airport and 15 minutes from downtown Orlando. There is direct access to public transportation and a wide range of shopping and service opportunities nearby.

The Orlando Housing Authority (OHA) submitted a RAD application in December 2013 to convert units at Citrus Square to Project Based Vouchers (PBV) under the RAD program. HUD issued a RAD CHAP (Commitment to Enter into a Housing Assistance Payment) on March 27, 2015.

RAD Conversion of Citrus Square will allow the OHA to properly maintain the complex, make necessary repairs/upgrades and improve accessibility for persons with disabilities. As part of the RAD process, OHA conducted a RAD Physical Conditions Assessment (RPCA) that identified capital improvement needs over the span of 20 years. In addition to improvements recommended in the RPCA, the OHA will modify five (5) units to achieve full accessibility for persons with mobility impairments. Modifications will be made to layouts of kitchens, bathrooms, corridors, hallways, and door widths, and other upgrades. OHA will also complete accessibility modifications to the community building/management office. The OHA will pursue 4% tax credits and bond financing to complete the improvements.

The OHA projects expending MTW block grant funds to supplement RAD project-based voucher rents at its Citrus development, consisting of approximately \$287,100 in the first full year and possible escalations in future years.

The Citrus Square RAD Conversion closed on December 28, 2017. Ovation Housing LLLP owns Citrus Square, and Stephenson and Moore manage the property. As of March 2018, the occupancy rate is 98%. Citrus Square is doing rehabilitation on all 87 units as prescribed by the physical needs analysis, and 5 ADA units are undergoing significant rehabilitation. Ovation Housing is currently receiving bids on needed bathroom repairs, and Stephenson and Moore has issued a RPF for repairs in response to an insurance audit.

**Lorna Doone**

Lorna Doone Apartments, built in 1970, is a 6 story 104 unit property comprised of studios and one bedroom for the elderly and disabled in west Orlando. Lorna Doone is wheelchair accessible, has central air and heating, on-site laundry facilities, a complete security system, a guest notification system, and a community center. Adjacent to downtown Orlando, Lorna Doone is within walking distance to Camping World Stadium and public transportation.

Included in the RAD Portfolio application for Citrus Square Apartments, the OHA received approval to submit an application to convert the units at Lorna Doone Apartments in March of 2015. Based on that approval, the OHA submitted a RAD application for Lorna Doone in March 2016. HUD issued a RAD CHAP (Commitment to Enter into a Housing Assistance Payment) for Lorna Doone in April of 2018.

The OHA submitted another RAD Portfolio application, which included Reeves Terrace [The Villas at Hampton Park is included in the Asset Management Project (AMP) with Reeves Terrace], Ivey Lane, Lake Mann, Griffin Park, The Villas at Carver Park, and The Landings at Carver Park to HUD in January 2018. In May of 2018, HUD issued a RAD CHAP (Commitment to Enter into a Housing Assistance Payment) for 4 of those 6 properties: Reeves Terrace, Ivey Lane, Lake Mann, and Griffin Park. The Landings and The Villas at Carver Park did not meet the RAD threshold; therefore, they were not approved. The OHA may substitute an equal number of units from another property in their place.

**Reeves Terrace**

Reeves Terrace, built in 1942, is a family site encompassing 171 units of 1, 2, 3, and 4 bedrooms. Located close to downtown Orlando, Reeves Terrace has handicap accessible units, central air and heat, washer hook-ups, and tile floors. Additionally, there is a Head Start Center, a playground, and a City of Orlando recreation center on the property. A myriad of shopping centers and public transportation are in close proximity.

**The Villas at Hampton Park**

The Villas at Hampton Park, built in 2004, is a senior site of 53, 1 bedroom units. Located close to downtown Orlando, The Villas at Hampton Park has handicap accessible units, central air and heat, ceiling fans, dishwashers, and tile floors. Additionally, there is an exercise room, reading area, patio area, chapel, computer lab, library, and day room on the property. A number of shopping centers and public transportation are in the neighborhood.

**Ivey Lane**

Ivey Lane Homes, built in 1971, is a family site made up of 181 units of 1, 2, 3, 4, 5 and 6 bedrooms. Positioned in west Orlando, Ivey Lane Homes has handicap accessible units, central air and heat, washer hook-ups, and mini-blinds. The City of Orlando Recreation Center, two playgrounds, and the OHA's Family Services Department are located on the property. Shopping and public transportation are nearby.

**Lake Mann**

Lake Mann Apartments was built in 1951. With 207 units of 1, 2, 3, 4, and 5 bedrooms, this family site is situated on the west side of Orlando. Lake Mann Apartments has handicap accessible units and washer hook-ups. A number of resident services are provided on the grounds of Lake Mann: community resource and computer center, Tot Lot, Kid's Cafe Recreation Center, and the Lake Mann Day Care Center. Lake Mann is next to McQueen Park and is close to the Citrus Bowl, shopping centers, and public transportation.



**Griffin Park**

Griffin Park Apartment, built in 1941, is a registered historical landmark in Orlando. It's a family site consisting of 171 units with studios, 1, 2, 3, and 4 bedrooms in downtown Orlando. Griffin Park has handicap accessible units and washer hook-ups. A community building, computer learning center, Tot Lot, and playground are on the property. Griffin Park borders the Amway Center and is close to public transportation.

These five awards require a Significant Amendment, which is attached in the Appendix. These conversions are in their infancy, and further information will be provided as the process takes shape.

**Project-Based VASH**

The OHA will project-base 45 (forty-five) Veterans Affairs Supportive Housing (VASH) vouchers at select locations within Orange County. The OHA will collaborate with viable partners in the community to execute this initiative with the purpose of housing difficult to place homeless veterans.

**Sanford Housing Authority (SHA)**

The OHA continues to manage the Sanford Housing Authority. The goals and objectives for SHA are to redevelop its former public housing sites. In FY2016, the SHA was awarded the Choice Neighborhoods Planning grant in the amount of \$500,000. This grant will support the development of a comprehensive neighborhood Transformation Plan for Castle Brewer Court (including William Clark Court,) Edward Higgins Terrace (including Cowan Moughton Terrace), and Lake Monroe Terrance in the Goldsboro neighborhood. The planning grant will be completed in FY2018. Additionally, the OHA and the SHA will look at other opportunities that continue to lay the foundation for the redevelopment of the former public housing sites.

# SECTION II

## GENERAL HOUSING AUTHORITY

### OPERATING INFORMATION

## SECTION II - GENERAL HOUSING AUTHORITY OPERATING INFORMATION

### A. Housing Stock Information

Planned New Public Housing Units to be Added During the Fiscal Year											
								# of UFAS Units			
AMP Name and Number	Bedroom Size							Total Units	Population Type	Fully Accessible	Adaptable
	0	1	2	3	4	5	6+				
PIC Dev. #/AMP PIC Dev. Name	0	0	0	0	0	0	0	0	N/A	N/A	N/A

Total Public Housing Units to be Added

0

Planned Public Housing Units to be Removed During the Fiscal Year		
PIC Dev. #/ AMP PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
FL004000010 Lorna Doone Apartments	104	<b>RAD Conversion</b> Lorna Doone Apartments is located at 1617 W. Central Avenue, Orlando, Florida. The Lorna Doone neighborhood is undergoing tremendous redevelopment. The redevelopment will increase residents' access to goods and services, schools, jobs, and transportation. Lorna Doone Apartments is one building with 60 studio apartments and 44 one bedroom units. The redevelopment will change the composition to 80 one bedroom units. The household composition is (76) elderly/disabled; (7) elderly/non-disabled, and (13) non-elderly/disabled. 52% of households are headed by males and 48% by females. Approximately 43% of residents identify as being Hispanic/Latino, 43% identify as being African American, and 14% identify with other groups. OHA submitted the RAD application on March 25, 2016. HUD's notification of the CHAP award to the OHA is pending.
FL004000002 Lake Mann	2	Due to extensive termite damage to Building 82 at Lake Mann, the OHA is removing those units.

Total Public Housing Units to be Removed

106

New Housing Choice Vouchers to be Project-Based During the Fiscal Year		
Property Name	Anticipated Number of new vouchers to be Project-Based	Description of Project
N/A		

Anticipated Total New Vouchers to be Project-Based	0	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	252
		Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	252*

\*Total Project-based vouchers committed and leased up include: West Oaks - Activity 6 (50); Jackson Court/Division Oaks (75), West Oaks - Activity 8 (20), Villages of West Lake (20), and Citrus Square (87) for a sum of 252.

Other Changes to the Housing Stock Anticipated During the Fiscal Year
<p>The OHA executed a Section 504 and a Section 3 Voluntary Compliance Agreement (VCA) with HUD in April 2015. The VCAs' duration is for a minimum of three years. Pursuant to the 504 VCA, the OHA will voluntarily comply with the following:</p> <ul style="list-style-type: none"> <li>Construct or convert a minimum of 5% or 76 public housing units into UFAS-accessible units. Modify some existing policies; specifically resident transportation, effective communication, transfers, service/emotional support animals, and reasonable accommodations.</li> <li>Provide annual employee education for new and existing staff focused on the OHA's duties and responsibilities pursuant to the Agreement and procedures to implement its terms.</li> <li>Provide initial and refresher notices to head of households describing the Agreement. Also provide copies of the Agreement to each manager and duly elected Resident Council.</li> </ul> <p>Pursuant to the Section 3 VCA, the OHA will voluntarily comply with the following:</p> <ul style="list-style-type: none"> <li>Submit a Section 3 Plan to HUD which meets the requirements of Section 3 regulations.</li> <li>Develop an educational plan that provides a minimum of 4 hours training to all new and existing staff responsible (directly or indirectly) for responding to, preparing, evaluating, and/or making decisions in regards to purchasing or procurement.</li> </ul>

General Description of All Planned Capital Fund Expenditures During the Plan Year
<p>OHA has \$857,478 of planned expenditures for the public housing sites' Capital Fund Financing Program loan repayment to Deutsche Bank.</p> <p>OHA plans to address much needed health and safety issues in public housing. OHA will expend capital funds to address mold, mildew, and termite issues and ongoing capital improvements. The termite infestation will be addressed at Griffin Park, and the mold/mildew issues will be addressed at every property. OHA will address other safety issues across its Asset Management properties. OHA also plans to continue making site improvements at each of the OHA sites.</p> <p>While OHA will shift some funds to address the health and safety issues above, OHA anticipates using approximately \$0.5 million in Capital Funds in FY2019 to retrofit units to meet VCA/ADA/UFAS requirements at many of its properties.</p>

**Non-Capital Expenses**

Non-Capital Expenditures include administrative salaries, security guard service, and architectural services/fees.

**B. Leasing Information****Planned Number of Households Served at the End of the Fiscal Year**

<b>MTW Households Served Through:</b>	<b>Planned Number of Households to be Served</b>	<b>Planned Number of Unit Months Occupied/Leased</b>
Federal MTW Public Housing Units to be Leased	1458	17496
Federal MTW Voucher (HCV) Units to be Utilized	2393	28716
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs	0	0
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs	0	0
<b>Total Households Projected to be Served</b>	<b>3851</b>	<b>46212</b>

**Reporting Compliance with Statutory MTW Requirements**

The OHA is in compliance with Section II(D) of the Standard MTW Agreement, thus no discussion is necessary.

**Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions**

<b>Housing Program</b>	<b>Description of Anticipated Leasing Issues and Possible Solutions</b>
Public Housing	<p>The chief issue related to leasing public housing units is that a substantial number of applicants fail the criminal background checks; however, HUD has changed its stance on criminal background checks which should improve this issue. The OHA has also reduced the criminal background check eligibility period from ten years to five years.</p> <p>Other issues impacting public housing occupancy include mold, mildew, termites, and VCA unit modifications. When a unit is found to have high elevations of mold and/or mildew, remediation is required. The OHA has requested approval from HUD to remove units from occupancy at Reeves Terrace due to extensive structural damage caused by termites. The units previously approved by HUD for VCA modifications will continue to be off-line until the modifications are complete.</p> <p>Adequate public transportation is also an issue. The lack of public transportation from the available public housing units to the applicant's place of employment often results in the applicant refusing the housing unit, which extends the time required to fill vacancies. Again, for the most part, this issue is not a matter for which the OHA has direct control.</p>

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions	
Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Housing Choice Voucher (HCV)	<p>The chief issue, relative to the leasing of HCVs, is the OHA's ability to pay the amount of the rent that an owner will accept. Typically, one of two scenarios occur: (1) The amount of rent that an owner requests may not be reasonable. In some instances, owners are willing to work with clients and accept a lesser rent. However, some owners prefer not to rent unless they receive the amount of rent they request. The OHA's possible solution is to negotiate with the owner such that the rent is in line with the rent reasonableness standards and up to 40% of the participant's income. Also, the OHA will continue to conduct presentations for the local realtor association(s) to increase the landlord pool for the OHA participants. (2) At the initial lease up, the client would be required to pay more than 40% of their adjusted income, which makes the home unaffordable. As a remedy, the OHA has agreed to increase its payment standard to 110%.</p> <p>Funding is also a potential issue for the HCV program. The OHA may not have enough administrative support to comply with HUD's leasing requirements.</p> <p>The OHA has increased the flexibility of its HCV occupancy standards to be the same as public housing's minimum and maximum number of persons per bedroom for all bedroom sizes as a remedy to some of its leasing challenges.</p>

### C. Wait List Information

Wait List Information Projected for the Beginning of the Fiscal Year				
Housing Program(s)	Wait List Type	Number of Households on Wait List	Wait List Open, Partially Open or Closed	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Public Housing Units	Community Wide	23,320*	Closed	No
Federal MTW Housing Choice Voucher Program	Community Wide	18,684*	Closed	No
Federal MTW Public Housing Units	Site-Based** This includes Carver – Villas & Landings	1183*	Closed	No

\*This data is as of August 2017.

Partially Open Wait Lists
N/A
Local, Non-Traditional Housing Program
N/A



Other Wait List Types	
N/A	
Changes to the Wait List or Policy Changes Regarding the Wait List	
Public Housing	No changes planned.
Housing Choice Voucher	No changes planned.

# SECTION III

## PROPOSED ACTIVITIES

## SECTION III - PROPOSED MTW ACTIVITIES

### Activity 13: Streamlined Public Housing Inspections

**Description:** The OHA will streamline inspections by conducting public housing unit inspections, by tenant, every three years (triennial) in tandem with triennial recertifications. Triennial inspections will replace annual inspections, and the OHA will provide strategic preventive maintenance at all properties throughout each year. Randomly selected units will be chosen, from the 2/3 of public housing populace that will not receive the triennial inspection that fiscal year, for inspection. Those inspections will include building exterior/systems and common areas at all public housing properties. When tenants move out, the OHA will continue to conduct inspections those units, and if a tenant requests an inspection before his/her triennial inspection, the OHA will perform the inspection. Lastly, the OHA will continue to comply with all REAC inspections and conduct 100% pre-REAC inspections at each selected site annually. Based on the REAC protocol, 16 (sixteen) to 24 (twenty-four) units at each site will be randomly selected for inspection every year.

**Achievement of Statutory Objectives:** Streamlined public housing inspections will reduce costs and achieve greater cost effectiveness in Federal expenditures via reduced staff hours, which consequently will offer agency savings.

**Anticipated Impacts:** Preemptive up keep of all of the public housing properties will not only ensure the longevity of the sites, but also reduce inspection expenses and work load capacity.

#### Anticipated Schedules for Achieving Objectives:

Year	Scheduled Activities
FY2019	1) Implement activity and perform 1/3 of unit inspections along with recertifications. 2) Provide preventative maintenance at all properties. 3) Conduct random sampling of unit inspections at all sites from the remaining 2/3 populace.
FY2020	1) Perform 2/3 of unit inspections along with recertifications. 2) Provide preventative maintenance at all properties. 3) Conduct random sampling of unit inspections at all sites from the remaining 2/3 populace.
FY2021	1) Perform 3/3 of unit inspections along with recertifications. 2) Provide preventative maintenance at all properties. 3) Conduct random sampling of unit inspections at all sites from the remaining 2/3 populace.

## Cost Effectiveness

### CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	\$0	\$0	To be determined	To be determined

### CE #2: Staff Time Savings

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

<b>CE #3: Decrease in Error Rate of Task Execution</b>				
<i>Unit of Measurement</i>	<i>Baseline</i>	<i>Benchmark</i>	<i>Outcome</i>	<i>Benchmark Achieved?</i>
Average error rate in completing a task as a percentage (decrease).	0	0	To be determined	To be determined

Need for Authorization: The Agency is authorized to deploy a risk management approach in establishing property and system inspection protocols and frequencies in lieu of the HUD requirements of annual inspection by Agencies, as long as these protocols assure that housing units assisted under the demonstration meet housing quality standards approved or established by the Secretary. This authorization waives certain provision of Section 6 (f) of the 1937 Act and 24 C.F.R. 902-Subpart B as necessary to implement the Agency's Annual MTW Plan.

# SECTION IV

## APPROVED ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

## SECTION IV - APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

### A. Implemented Activities

#### Activity 1: \$225 Rent Floor for Non-Elderly and Non-Disabled Households

Approval & Implementation Year: Activity 1 was first approved in FY2012. The phased-in implementation began in the Initial Demonstration Period.

Description: Phase in the implementation of a self-sufficiency rent floor of \$225 for households that are not elderly and not disabled. The implementation of the rent floor includes a referral to the MTW Resource Center for non-elderly and non-disabled households not paying \$225 at the time the rent floor is implemented. The implementation of the \$225 rent floor provides hardship exceptions linked to self sufficiency activities.

The MTW Resource Center provides self sufficiency services including, but not limited to, case management, needs assessments, employability counseling, and job referral/placement assistance services for a maximum of two years for each adult referred. Use of a computer lab, transportation (bus passes), and child care assistance is provided to help participants secure and maintain employment. The OHA monitors the progress of households subject to the rent floor relative to accomplishing the goals identified in their self sufficiency plan until sufficiency is reached.

Status: Partially Implemented.

Previously, only the OHA public housing residents had been referred to the Resource Center. In FY2018, housing choice voucher participants who are non-elderly and non-disabled and cannot pay the \$225 rent floor were referred to the Resource Center. Services to increase self sufficiency and earned income will be offered to both public housing residents and housing choice voucher participants. This will continue in FY2019. HCV participants that are unable to pay the rent floor or attend the Resource Center may seek hardship relief.

Anticipated Modifications: None.

Changes to the metrics, baselines or benchmarks during the Plan Year: The applicable standard HUD metrics have been selected. OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Authorization(s): OHA does not require any different authorizations from those stated previously.

Significant Change Requiring Re-Proposal: No significant change has occurred to require re-proposal.



## Activity 2: Streamline the Recertification Process in the Public Housing and Housing Choice Voucher Programs

**Approval & Implementation Year:** Activity 2, in its current form, was approved in FY2015 (November 2014). The phased-in implementation began in FY2015.

**Description:** Streamline the recertification process in the public housing and housing choice voucher programs by conducting recertification of all residents and participants every three years (triennial). This means that every three years, residents and participants will come into the office to conduct the traditional recertification with the exception of a modified 3<sup>rd</sup> party verification and \$25,000 asset disregard.

The streamlined recertification began in 2015. The OHA recertified one third of all residents and participants in FY2015, one-third in FY2016, and the last one-third in 2017. In 2018, the OHA will recertify another one-third of its residents and participants. Thereafter, the OHA proposes to implement this activity by recertifying one third (1/3) of its full population each year.

In its FY2016 MTW Plan, the OHA received HUD approval to apply all aspects of this activity to NED, FUP, VASH and SHA vouchers. In FY2017, the OHA sought to modify this activity to add its Single Room Occupancy (SRO) voucher program, which was approved. The OHA applied this change in FY2018.

Due to the extended recertification period, the OHA has created a local form 9886, Authorization for Release of Information. The local form captures the same information as the HUD form 9886 except that the resident/participant's consent for release of information will be extended from 15 months to 36 months as needed to update the resident/participant's data between each triennial recertification.

### *OHA Annual Online Updates*

In the years when residents and participants do not have their scheduled recertification, they will have an annual online update. The OHA will use this as an opportunity to conduct an audit to review the household composition, tax return, and criminal background check. During the annual online update, The OHA will recalculate rent in the following circumstances:

1. If the total tenant payment (TTP) increases or decreases by \$100 or more; or
2. If the family size / household composition changes such that a person with new income is added to the household; or
3. Hardships; or
4. Criminal background checks leading to termination; or
5. Reasonable Accommodations

### Triennial Implementation Schedule

PH/HCV	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	FY2021	FY2022
Recertification	Group 1 1/3 Entire Population	Group 2 1/3 Entire Population	Group 3 1/3 Entire Population	Group 1 1/3 Entire Population	Group 2 1/3 Entire Population	Group 3 1/3 Entire Population	Group 1 1/3 Entire Population	Group 2 1/3 Entire Population
Annual Online Update	None	Group 1 and Group 3	Group 1 and Group 2	Group 2 and Group 3	Group 1 and Group 3	Group 1 and Group 2	Group 2 and Group 3	Group 1 and Group 3

*OHA Elimination of Interim Recertifications*

The OHA will continue to streamline the recertification process by eliminating interim recertification completely except for hardships, audits (including criminal background checks, change in family size/ household composition<sup>1</sup>), and reasonable accommodations for all residents and participants.

*Flat Rent*

The OHA public housing residents are granted the ability to choose the Flat Rent Option twice per year rather than annually.

Status: Triennial recertifications are underway for both HCV and public housing. The HCV program now offers participants the option to go online or call to schedule an appointment with an eligibility specialist. Public Housing plans to offer residents the option to schedule appointments online or by phone but currently utilizes the traditional method of issuing appointment dates and times by mail. The OHA has added its Single Room Occupancy (SRO) voucher program to this activity.

The OHA has implemented annual online updates, which allows residents and participants verify household composition, income and assets online. The updates include resident/participant submission of a personal declaration form, verification of IRS tax filing, and other documents. For residents and participants without computer access, the OHA provides computers at two locations.

In FY2018, the OHA implemented a recertification unit, whereby the OHA employees are cross-trained to administer both public housing and HCV recertifications.

Anticipated Modifications: None.

Changes to the metrics, baselines or benchmarks during the Plan Year: The applicable standard HUD metrics have been selected. The OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Authorization(s): OHA does not require any different authorizations from Attachment C or D.

Significant Change Requiring Re-Proposal: No significant change has occurred to require re-proposal.

---

<sup>1</sup> The OHA MTW FY2015 Plan states that interims would be eliminated completely except for...decreases in family size...Upon further consideration, OHA decided to revert to its previous practice of conducting interims when there is a change in family size / household composition.

**Activity 6: Provide up to 50 One and Two Bedroom Units and Supportive Services at West Oaks Apartments for up to 24 Months for Homeless Individuals**

Approval & Implementation Year: Activity 6 was first approved in FY2012. The phased-in implementation began in September 2013.

Description: The OHA seeks to provide up to 50 project-based vouchers for one and two bedroom units at West Oaks Apartments without a competitive process. This transitional housing will be available to agencies that commit to provide supportive services to homeless individuals for up to 24 months.

Status: Implemented. HUD has approved all 50 project-based vouchers to be used in coordination with homeless service providers. At the end of FY2017, 40 vouchers were in use, and the OHA projects having fifty (50) project based vouchers in use by the end of FY2018.

Anticipated Modifications: None.

Changes to the metrics, baselines or benchmarks during the Plan Year: The applicable standard HUD metrics have been selected. OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Authorization(s): OHA does not require any different authorizations from those stated previously.

Significant Change Requiring Re-Proposal: No significant change has occurred to require re-proposal.

## Activity 8: Project-Based Vouchers in OHA Owned Units

Approval & Implementation Year: Activity 8 was first approved and the phased-in implementation began in FY2016.

Description: The OHA will project base up to 20% or 538 of its available tenant based section 8 vouchers at OHA owned units. HUD approved MTW flexibilities to allow the OHA to implement this activity without engaging in a competitive process. The OHA was also granted approval to conduct its own inspections and rent reasonableness functions.

The OHA will implement its project-based voucher program at Jackson Court, Division Oaks, and West Oaks which are approved sites for the project-based voucher program. The vouchers at West Oaks will be in addition to the PBV vouchers discussed in Activity 6 (transitional housing for the homeless). Although this activity contemplates that the OHA will develop new properties and/or acquire existing properties in which certain units will qualify for project based vouchers, no additional properties are anticipated for this activity in FY2019. The policies and processes for implementing the OHA PBV program will be the same as its tenant-based voucher program.

Status: Partially Implemented.

Anticipated Modifications: None.

Changes to the metrics, baselines or benchmarks during the Plan Year: The applicable standard HUD metrics have been selected. The OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Authorization(s): The OHA does not require any different authorizations from Attachment C or D.

Significant Change Requiring Re-proposal: No significant change has occurred to require re-proposal.

## Activity 9: Establishment of Agency-Wide \$100 Minimum Rent

Approval and Implementation Year: Activity 9 was first approved and implemented in FY2016.

Description: In FY2016, the OHA requested the MTW flexibilities to establish a minimum rent that exceeds \$50 for both public housing and the housing choice voucher program. The OHA requested approval to establish an agency-wide minimum rent of \$100. Agency-wide programs will include public housing, tenant-based rental assistance vouchers and project-based vouchers. In FY2016, the OHA received approval to apply the \$100 minimum rent agency-wide including SHA, FUP, NED, Port-ins, and VASH<sup>2</sup> vouchers. The households shall pay rent of at least \$100 after the provision of utility allowances. The OHA requested a modification of this activity, which was approved by HUD. These flexibilities are now applicable to its Single Room Occupancy (SRO) voucher participants.

The chart below details the establishment of minimum rents for all the OHA programs.

Status of Minimum Rents for OHA Programs			
Source	Before Changes	FY17 / Year 6	FY18 / Year 7
<b>Public Housing</b>			
1. Traditional			
2. Carver Villas			
3. Carver Landings	\$50	\$100	\$100
<b>HCV</b>			
Regular vouchers	\$50	\$100	\$100
FUP	\$50	\$100	\$100
NED	\$50	\$100	\$100
Port-Ins	\$50	\$100	\$100
SRO (mod)	\$50	\$100	\$100
VASH	\$0 if no income \$50 if income	\$0 if no income \$50 if income	\$0 if no income \$50 if income
TBRA (non-MTW / chronically homeless with City of Orlando funding)	N/A	\$0 if no income \$50 if income	\$0 if no income \$50 if income
Chronic Homelessness Prevention Program (150 vouchers) - Act #10	N/A	\$0 if no income \$50 if income	\$0 if no income \$50 if income
West Oaks transitional vouchers to prevent homelessness - Act #6	\$50	\$100	\$100
West Oaks PBV - Act #8	\$50	\$100	\$100
Jackson/Division PBV - Act #8	\$50	\$100	\$100
SHA	\$50	\$100	\$100
Antioch (non-MTW)	\$25	\$25	\$25
RAD	N/A	\$100	\$100

Status: Implemented.

Anticipated Modifications: None.

<sup>2</sup> The OHA MTW FY 2016 Plan states that the minimum rent for VASH participants will be \$100. Upon further consideration, in its FY2017, OHA decided to revert to a policy it established June 1, 2012 by resolution to have VASH participants with income pay a minimum rent of fifty dollars (\$50.00) and VASH participants with zero income pay zero dollars (\$0.00). By resolution, this policy will also apply to participants in OHA's Homelessness Prevention Program.

Changes to metrics, baselines or benchmarks during the Plan Year: The applicable standard HUD metrics have been selected. The OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Authorization(s): The OHA does not require any different authorizations from those stated previously.

Significant Change Requiring Re-Proposal: No significant change has occurred to require re-proposal.



### **Activity 10: Tenant-Based Voucher Homelessness Prevention Program**

Description: OHA and the City of Orlando are partnering to administer a voucher program to address chronic homelessness as a part of the 25 Cities Initiatives. The Orlando Veteran's Affairs Medical Center is also a participant. Chronic homelessness is defined as adults with a disabling condition who have been continuously homeless for at least one year or have had four episodes of homelessness in the past three years. The disabling condition(s) limits an individual's ability to work or perform one or more activities of daily living and is defined as a diagnosable substance use disorder, serious mental illness, developmental disability or chronic physical illness.

In this activity, OHA will provide vouchers and the City of Orlando will provide services for approximately 150 chronically homeless persons identified by the City of Orlando. Depending on funding availability, the City of Orlando will provide approximately \$4,000 in services annually per household served. The City of Orlando funding will be used to provide an estimated 10 case managers to handle an average of 15 clients per case manager. The City of Orlando will refer the chronically homeless persons under case management to OHA. Once confirmed eligible, these referrals will bypass the section 8 wait list and other eligibility criteria.

OHA will also partner with other agencies that can provide supportive services to increase OHA's ability to house the chronically homeless.

Status: Partially Implemented.

Anticipated Modifications: None

Changes to the metrics, baselines or benchmarks during the Plan Year: The applicable standard HUD metrics have been selected. OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Authorization(s): OHA does not require any different authorizations from those stated previously.

Significant Change Requiring Re-Proposal: No significant change has occurred to require re-proposal.

## B. Not Yet Implemented

### Activity 11: Project-Based Homeownership Program

Approval & Implementation Year: Activity 11 was first approved in FY2018. The phased-in implementation has yet to begin as planning is still underway.

Description: The Orlando Housing Authority is implementing a Section 8 Project-Based Homeownership Program, over a ten year period, beginning with the 82 homeownership units that have not been developed at Carver Park.

The OHA has partnered with the City of Orlando and other stakeholders to construct 82 homes at Carver Park. The site will be mixed-income: a number of homes sold will be affordable and a number of homes will be sold at market rate. OHA will provide monthly homeownership assistance to some or all of the affordable buyers and also provide the value of the improved land and impact fee credits, if available from the City of Orlando. Below is the chart detailing the proposed plan.

CARVER PARK HOMEOWNERSHIP					
<u>Residential Type</u>	<u>#Bed/Bath</u>	<u># of units</u>	<u>Affordable</u>	<u>Market Rate</u>	<u>Avg. House SF</u>
Single family	4/2	3	1	2	1,569
Single family*	3/2	8	3	5	1,342
*Townhome (38) or ** Duplex (14)	3/2	52	16	36	1,250
Rowhouse (10 units/bldg-2 bldgs)	2/2	<u>20</u>	<u>10</u>	<u>10</u>	1,150
Sub-total		83	30	53	
* Completed Model Home		<u>-1</u>			
Total		82			
* Townhome w/garage 6-7 units /bldg					
** Duplex - 2 units per building					

Carver Park homeownership opportunities will be offered to the following eligible households:

1. Households that relocated from Carver Court as a part of the Uniform Relocation Act
2. Current OHA public housing/Section 8 participants
3. Applicants on the OHA public housing and Section 8 waiting lists
4. Households currently living in the Parramore area
5. Eligible OHA Employees - Excludes staff involved in the decision making process and contractors/subcontractors that have any direct or indirect interest (24 CFR 982.161) in accordance with the general procurement standards (2 CFR 200.318).

While a preference for homeownership placement will be given to the abovementioned households, the OHA will consider other low-income households that are not on the wait list but are ready for homeownership, in order to fulfill its commitment to the Carver Park Community. Additionally, the OHA may partner with The Orlando Chapter of the Urban League to gain access other qualified low-income households.

Status: A market study has been completed. The OHA is using the results of the study to develop the Carver homeownership strategy including but not limited to, the process, program administration, waitlist management, unit pricing, timeline, and the amount of OHA dollars to be dedicated to this activity. Concrete plans have not been solidified, as the OHA is still in discussion with the City of Orlando.

Anticipated Modifications: None.

Changes to metrics, baselines or benchmarks during the Plan Year: The applicable standard HUD metrics have been selected. The OHA does not anticipate changes to the metrics, baselines or benchmarks during the Plan year.

Authorization(s): The OHA does not require any different authorizations from those stated previously.

Significant Change Requiring Re-Proposal: No significant change has occurred to require re-proposal.

#### C. On Hold

No activities.

#### D. Closed Out Activities

##### **Activity 3: Streamline the Rent Calculation Process in the Public Housing & Housing Choice Voucher Programs**

Approval and Implementation Year: Activity 3 was first approved in FY2012. Implementation of Activity 3 began in FY 2013.

Reason for Closing Out Activity: OHA combined activities 2 and 3. See section IV: Approved Activities.

Year Activity was Closed Out: FY 2015.

There are no HUD Metrics for this activity because this activity did not reach the data collection phase.

##### **Activity 4: Consolidation of Inspection and Recertification Requirements to Establish an Inspection Process Based on Geographic Location**

Approval and Implementation Year: Activity 4 was first approved in FY2012. Implementation of Activity 4 began in FY2013 with the inspection process based on geographic location.

Reason for Closing Out Activity: A key part of Activity 4 was to have a unified public housing and voucher inspection mechanism based on HQS standards. Activity 4 was closed out because HUD will continue to undertake UPCS public housing REAC inspections, thereby effectively causing the OHA also to use UPCS inspections for public housing. The OHA's basing of the inspection process on geographic location has been discontinued because inspection by geographic location was no longer efficient when the HQS standards could not be used for both public housing and section 8.

Year Activity was Closed Out: FY2014.

See FY2013 Report for the last activity 3 metrics.

### **Activity 5: Supporting up to 50 Homeowners for Six (6) Months Each by Providing Interim Financial Assistance (vouchers) and Counseling to Prevent Foreclosures**

Approval & Implementation Year: Activity 5 was first approved in FY2012. The phased-in implementation began in FY2014.

Reason for Closing Out Activity: The climate for homeowners facing foreclosure has changed significantly from 2009, when this activity was first proposed. The OHA has identified a huge challenge in finding homeowners that will be “made whole” by providing six (6) months of financial assistance. Program revisions to provide a lump sum payment to the lender on behalf of an eligible program approved applicant to bring their mortgage loan current and move forward were not successful. The current households that meet the eligibility requirement all need more money than the voucher program will offer.

Year Activity was Closed Out: FY2015.

See FY2014 Report for the last activity 5 metrics.

### **Activity 7: Use of Project-Based Vouchers and Other Resources to Develop Low-Income City Donated Property for Low-Income Elderly Housing, in Conjunction with the Redevelopment of Jackson Court/Division Oaks**

Approval and Implementation Year: Activity 7 was first approved in FY2012.

Reason for Closing Out Activity: Activity 7 was closed out as it did not move beyond its planning stages. OHA and the City of Orlando unsuccessfully attempted to find land and funding for the redevelopment of Jackson Court/Division Oaks. Although OHA executed a Memorandum of Understanding with the Carver Theatre Developers (CTD), CTD’s inability to procure loans for construction financing prevented the activity from moving forward.

Year Activity was Closed Out: FY2014.

There are no HUD Metrics for this activity, because the activity never progressed past planning discussions.

### **Activity 12: Tenant-Based Rental Assistance Program**

Approval and Implementation Year: Activity 12 was first approved and implemented in FY2018.

Reason for Closing Out Activity: This activity was a program in which the OHA would provide funds for the first month’s rent for homeless households and then receive a reimbursement from the City of Orlando. The OHA conducted a cost benefit analysis of this activity and concluded that the administrative burden of continuing this activity far outweighed the benefit to the community. The financial and human resources allocated to this activity could be better utilized elsewhere.

Year Activity was Closed Out: FY2018.

There are no HUD Metrics for this activity.

# SECTION V

## SOURCES AND USES OF FUNDS

## SECTION V - Sources and uses of funds\*

### A. Sources and Uses of Funds

Estimated Sources of MTW Funding for the Fiscal Year		
Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$4,834,902
70600	HUD PHA Operating Grants	\$27,088,812
70610	Capital Grants	\$825,285
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$342,220
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$2,468,290
<b>70000</b>	<b>Total Revenue</b>	<b>\$35,559,509</b>

Estimated Uses of MTW Funding for the Fiscal Year		
Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$3,782,743
91300+91310+92000	Management Fee Expense	
91810	Allocated Overhead	\$5,457,353
92500 (92100+92200+92300+92400)	Total Tenant Services	\$427,818
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$1,082,637
93500+93700	Labor	
94000 (94100+94200+94300+94500)	Total Ordinary maintenance	\$3,701,830
95000 (95100+95200+95300+94500)	Total Protective Services	\$689,830
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$398,754
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expense	\$431,155
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$352,934
97100+97200	Total Extraordinary Maintenance	

97300+97350	Housing Assistance Payment + HAP Portability-In	\$19,234,455
97400	Depreciation Expense	\$1,867,352
97500+97600+97700+97800	All Other Expenses	
<b>90000</b>	<b>Total Expenses</b>	<b>\$37,426,861</b>

\*Line 97400 is a non-cash expense. Once removed, OHA's total expenses are \$35,559,509

### General

OHA plans to address much needed health and safety issues in public housing. OHA will expend capital funds to address mold, mildew, and termite issues as well as modernizing elevators. The termite infestation will be addressed at Griffin Park, and the mold/mildew issues will be addressed at every property. OHA will address other safety issues across its Asset Management properties. OHA also plans to continue making site improvements at each of the OHA sites.

While OHA will shift some funds to address the health and safety issues above, OHA anticipates using approximately \$0.5 million in Capital Funds in FY2019 to retrofit units to meet VCA/ADA/UFAS requirements at many of its properties.

### Describe the Activities that Will Use Only MTW Single Fund Flexibility

In addition to the activities described above, OHA continues to use the MTW Single Fund Flexibility to support Uses of Funds A.

### **Use of Funds A: Comprehensive One-Stop Self-Sufficiency Resource Center**

Use of Funds Action A is to provide a Comprehensive One-Stop Self-Sufficiency Resource Center. The MTW Resource Center is linked to MTW Activity 1 – Phase in the implementation of a self-sufficiency rent floor of \$225 for households which are not elderly and not disabled. The implementation of the rent floor includes a referral to the MTW Resource Center for non-elderly and non-disabled households not paying \$225 at the time the rent floor is implemented. For the first five years, only public housing residents were referred to the Resource Center. In FY2017, the OHA phased-in its non-elderly and non-disabled housing voucher program participants that are not paying the rent floor of \$225. This will continue in FY2019. The implementation of the \$225 rent floor provides hardship exceptions linked to self sufficiency activities conducted at the MTW Resource Center.

The MTW Resource Center provides self sufficiency services, including but not limited to, case management, needs assessments, employability counseling, and job referral/placement assistance services for a maximum of two years for each adult referred. Use of a computer lab, transportation (bus passes) and child care assistance is provided to help participants secure and maintain employment. The OHA monitors the progress of households subject to the rent floor relative to accomplishing the goals identified in their self sufficiency plan until self-sufficiency is reached.

In the past, the MTW Resource Center has partnered with a number of agencies to provide services to residents referred to the Resource Center. The Resource Center plans to continue to develop and foster relationships that will help the OHA's residents and participants become more self-sufficient.

The MTW Resource Center will continue to establish relationships with employers to facilitate job referrals and consequently strengthen and/or build economic self-sufficiency for the OHA participants and residents. In addition, the Resource Center will extend its partnership with CareerSource (formerly Work Force Center Florida) to bring employability workshops to the Ivey Lane Homes site using its mobile unit.

OHA estimates \$700,000 to be expensed for this endeavor

#### B. MTW Plan: Local Asset Management Plan

Local Asset Management Plan	
<b>Sources</b>	
Is the PHA allocating costs within statute?	No
Is the PHA implementing a local asset management plan (LAMP)?	Yes
Has the PHA provided a LAMP in the appendix?	Yes



# SECTION VI

## ADMINISTRATIVE

## SECTION VI - ADMINISTRATIVE

A. Resolutions signed by the Board of Commissioners adopting the Annual MTW Plan Certification of Compliance and the inclusion of the RAD Significant Amendment and Demolition into the MTW Plan (includes Certificates of Consistency).

- 1) Certificates of Consistency – Orange County
- 2) Certificate of Consistency – City of Orlando

**APPROVAL AND AUTHORIZATION TO SUBMIT THE ORLANDO HOUSING AUTHORITY'S MOVING TO WORK YEAR 8 PLAN COVERING THE PERIOD APRIL 1, 2018 THROUGH MARCH 31, 2019 TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

**WHEREAS**, the Orlando Housing Authority's (OHA) mission is to offer a choice of safe and affordable housing options and opportunities for economic independence for residents of Orlando and Orange County, and

**WHEREAS**, the Moving to Work (MTW) demonstration program supports the Orlando Housing Authority's mission and the Orlando Housing Authority has been designated as a MTW agency, and

**WHEREAS**, the Orlando Housing Authority prepared its Moving To Work (MTW) year 8 Plan covering the period April 1, 2018 through March 31, 2019, and

**WHEREAS**, the Plan was available for public comment for at least thirty (30) days, and there were no less than fifteen (15) days between the public hearing and the approval of the Plan by the Board of Commissioners in order to incorporate any public comments into the Annual MTW Year 8 Plan, and

**WHEREAS**, the Orlando Housing Authority did not receive any public comment about the program design, and

**WHEREAS**, the Orlando Housing Authority's Moving to Work year 8 Plan is incorporated by reference into this Resolution.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of the Housing Authority of the City of Orlando, Florida, approves and authorizes the President/CEO to submit the Orlando Housing Authority's Moving To Work Year 8 Plan covering the period April 1, 2018 through March 31, 2019 to the U. S. Department of Housing and Urban Development and authorizes the President/CEO to execute all necessary agreements and to make changes that are not substantial.



**VIVIAN BRYANT, ESQ.**  
**PRESIDENT/CEO**



**ED CARSON**  
**CHAIR**

**November 9, 2017**

**Date**



**APPROVAL OF THE AMENDMENT TO THE MOVING TO WORK FISCAL YEAR 2019 PLAN TO INCLUDE THE DEMOLITION OF GRIFFIN PARK APARTMENTS AND LAKE MANN HOMES, AND THE SIGNIFICANT AMENDMENT FOR THE RENTAL ASSISTANCE DEMONSTRATION (RAD) PROGRAM**

**WHEREAS**, the Orlando Housing Authority's (OHA) mission is to offer a choice of safe and affordable housing options and opportunities for economic independence for residents of Orlando and Orange County, Florida, and

**WHEREAS**, the Moving to Work (MTW) demonstration program supports the Orlando Housing Authority's mission and OHA has been designated an MTW Agency, and

**WHEREAS**, the Orlando Housing Authority (OHA) prepared and submitted its Fiscal Year 2019 Moving To Work (MTW) Plan covering the period from April 1, 2018 through March 31, 2019, to the United States Department of Housing and Urban Development (HUD) January 12, 2018, and

**WHEREAS**, HUD approval of the Fiscal Year 2019 Moving to Work Plan is pending, and

**WHEREAS**, the OHA seeks to augment its Fiscal Year 2019 Moving to Work (MTW) Plan to include (1) the demolition of Griffin Park Apartments and Lake Mann Homes, and (2) the conversion of selected public housing sites to the HUD Rental Assistance Demonstration (RAD) Program, and

**WHEREAS**, the Orlando Housing Authority seeks to demolish two of its older public housing complexes, Griffin Park Apartments, 171 units, built in 1941, and Lake Mann Homes, 210 units, built in 1951, and

**WHEREAS**, the Orlando Housing Authority was a successful applicant for the HUD Rental Assistance Demonstration (RAD) program for five (5) public housing sites; Lorna Doone Apartments, Ivey Lane Homes, Reeves Terrace Apartment/The Villas at Hampton Park, Griffin Park Apartments and Lake Mann Homes, and

**WHEREAS**, the Orlando Housing Authority seeks to pursue Rental Assistance Demonstration (RAD) conversion of the above-referenced sites, which requires a RAD Significant Amendment to the Moving to Work (MTW) Fiscal Year 2019 Plan, and

**WHEREAS**, the Significant Amendment includes, but is not limited to, a description of the units to be converted, the scope of the RAD conversions, any changes in the number of units, unit configuration, and proposed policy changes, etc.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of the Housing Authority of the City of Orlando, Florida approve the Amendment of the Moving to Work Fiscal Year 2019 Plan to include the demolition of Griffin Park Apartments and Lake Mann Homes, and the Significant Amendment for the Rental Assistance Demonstration (RAD) Program and authorize her to execute agreements and to make changes that are not substantial.



**VIVIAN BRYANT, ESQ.**  
**PRESIDENT/CEO**



**ED CARSON**  
**CHAIR**

**July 19, 2018**  
**DATE**

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

Attachment B

**Certifications of Compliance**

Annual Moving to Work Plan  
Certifications of Compliance

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning April 1, 2018, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.



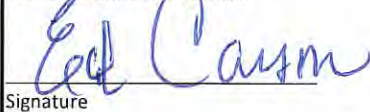
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority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

Orlando Housing Authority  
PHA Name

FL004  
PHA Number/HA Code

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

Ed Carson  
Name of Authorized Official

  
Signature

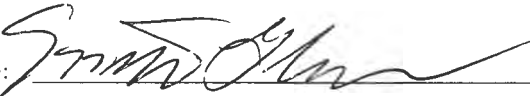
Chairman of the Board  
Title

November 9, 2017  
Date

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

**Certification of Consistency  
with the Consolidated Plan****U.S. Department of Housing  
and Urban Development**

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

Applicant Name: Housing Authority of the City of Orlando, FloridaProject Name: FY 2019 Moving to Work (MTW) PlanLocation of the Project: Orlando, FL, Orange County  
  
Name of the Federal  
Program to which the  
applicant is applying: n/aName of  
Certifying Jurisdiction: Orange County, FloridaCertifying Official  
of the Jurisdiction  
Name: Mitchell GlasserTitle: ManagerSignature: Date: 10/31/17 

# Certification of Consistency with the Consolidated Plan

U.S. Department of Housing  
and Urban Development

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

Applicant Name: Housing Authority of the City of Orlando, Florida

Project Name: FY 2019 Moving to Work (MTW) Plan

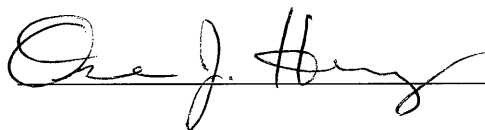
Location of the Project: Orlando, FL, Orange County  
\_\_\_\_\_  
\_\_\_\_\_

Name of the Federal  
Program to which the  
applicant is applying: n/a

Name of  
Certifying Jurisdiction: City of Orlando, Florida

Certifying Official  
of the Jurisdiction  
Name: Oren J. Henry

Title: Director

Signature: 

Date: Nov. 2, 2017



## B. Public Comment Period

The MTW Plan was made available for public review beginning Monday, September 18, 2017 through Thursday, October 19, 2017. The Public Hearing was held at 2:00 pm on Thursday, October 19, 2017 at the OHA Administration Office, 390 N. Bumby Avenue, Orlando, Florida 32803. Twenty-four (24) people attended the public hearing.

The OHA notified residents and the local community about the date and time of the public hearing by placing ads in English in the Orlando Sentinel, Sanford Herald, La Prensa (Spanish), and the Orlando Times. During the comment period, copies of the draft FY2019 MTW Plan were made available at the OHA Administrative Office and the OHA Lake Mary Office. The OHA also posted the draft FY2019 Plan on its website to elicit comments from residents and the local community. The OHA received no comments for the FY2019 MTW Plan.

Pursuant to HUD procedures, the OHA modified its submitted FY2019 MTW Annual Plan to include a demolition proposal for Griffin Park and Lake Mann Apartments and a RAD Significant Amendment for Lorna Doone Apartments, Lake Mann Apartments, Griffin Park Apartments, Ivey Lane Homes, and Reeves Terrace/The Villas at Hampton Park. The OHA reissued its FY2019 MTW Plan for public review beginning on Monday, May 28, 2018 through Thursday, June 28, 2018. The Public Hearing was held at 2:00 pm on Thursday, June 28, 2018 at the OHA Administration Office, 390 N. Bumby Avenue, Orlando, Florida 32803. Thirty-six (36) people attended the public hearing, and there was one comment.

The OHA notified residents and the local community about the date and time of the second public hearing by placing ads in English in the Orlando Sentinel, Sanford Herald, La Prensa (Spanish), and the Orlando Times. During the comment period, copies of the reissued FY2019 MTW Plan were made available at the OHA Administrative Office and the OHA Lake Mary Office. The OHA also posted the reissued FY2019 Plan on its website to elicit comments from residents and the local community.

Comment #	Individual / Organization	Comment	OHA Response
1	Lawanna Gelzer	I would like the OHA to provide health education to Griffin Park residents. Due to the issues with construction, residents are now suffering from air quality and vermin issues. I would like the OHA to help identify, educate, and address issues as they arise pertaining to resident health and living during the construction process.	Thank you for your comment regarding residents issues with Griffin Park. The OHA plans to demolish Griffin Park with plans of rebuilding a better community. The OHA will consider your comment and proceed accordingly based on our administrative capabilities.

## C. Evaluations of Demonstration Period

The OHA would benefit most from an evaluation that covers a larger scope of implemented MTW activities; however, OHA will need more time to determine whether the metrics that have been chosen are effective in evaluating the activities. Therefore, an evaluation at this time does not seem prudent in FY2019.

## D. Annual Statement/Performance and Evaluation Report or Subsequent Form Required by HUD for MTW and non-MTW Capital Fund Grants for Each Grant That Has Unexpended Amounts, Including Estimates for the Plan Year and All Three Parts of the Report

1. CFP Annual Statements/Performance & Evaluations Reports
2. Capital Fund Program 5 Year Action Plan (Part I: FY2017 - FY2021, Part II: FY2017 - FY2021, and Part III: FY2017 - FY2021)

Part I: Summary

PHA Name: Orlando Housing Authority

Grant Type and Number  
Capital Fund Program Grant No: FL-29004501-14 Replacement Housing Factor Grant No:  
Date of CFFP:

FFY of Grant:  
2014

FFY of Grant Approval:  
2014

Type of Grant  
☐ Original Annual Statement  
☒ Performance and Evaluation Report for Period Ending:

☐ Reserve for Disasters/Emergencies  
☒ X Revised Annual Statement (revision no: 1 )  
☐ Final Performance and Evaluation Report

Line	Summary by Development Account	Original	Total Estimated Cost	Revised <sup>2</sup>	Obligated	Total Actual Cost <sup>1</sup>	Expended
1	Total non-CFP Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>	\$0.00		\$315,299.07	\$315,299.07	\$315,299.07	\$315,299.07
3	1408 Management improvements	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
4	1410 Administration (may not exceed 10% of line 21)	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
5	1411 Audit	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
6	1415 Liquidated Damages	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
7	1430 Fees and Costs	\$40,000.00		\$103,596.96	\$103,596.96	\$40,000.00	\$40,000.00
8	1440 Site Acquisition	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
9	1450 Site improvement	\$330,000.00		\$136,123.97	\$136,123.97	\$136,123.97	\$136,123.97
10	1460 Dwelling Structures	\$713,276.00		\$707,896.00	\$707,896.00	\$620,255.25	\$620,255.25
11	1465.1 Dwelling Equipment—Nonexpendable	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
12	1470 Non-dwelling Structures	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
13	1475 Non-dwelling Equipment	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
14	1485 Demolition	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
15	1492 Moving to Work Demonstration	\$215,640.00		\$3,049.00	\$3,049.00	\$3,049.00	\$3,049.00
16	1495.1 Relocation Costs	\$0.00		\$32,951.00	\$32,951.00	\$29,034.35	\$29,034.35
17	1499 Development Activities <sup>4</sup>	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
18a	1501 Collateralization or Debt Service paid by tie PIA	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$857,478.00		\$857,478.00	\$857,478.00	\$857,478.00	\$857,478.00
19	1502 Contingency (may not exceed 8% of line 20)	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$2,156,394.00		\$2,156,394.00	\$2,156,394.00	\$2,001,239.64	\$2,001,239.64
21	Amount of line 20 Related to LBP Activities						
22	Amount of line 20 Related to Section 504 Activities						
23	Amount of line 20 Related to Security - Soft Costs						
24	Amount of line 20 Related to Security - hard Costs						
25	Amount of line 20 Related to Energy Conservation Measures						

1 To be completed for the Performance and Evaluation Report.

2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

3 PIAs with under 250 units in management may use 100% of CFP Grants for operations.

4 RIF funds shall be included here.

<b>Part 1: Summary</b>									
<b>PHA Name: Orlando Housing Authority</b>	<b>Grant Type and Number</b> Capital Fund Program Grant No: FL29P004501-14 Date of CFFP: _____ Replacement Housing Factor Grant No: _____								
<b>FFY of Grant: 2014</b> <b>FFY of Grant Approval: 2014</b>									
<b>Type of Grant</b> <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: <b>X Revised Annual Statement (revision no: 1 )</b> <input type="checkbox"/> Summary by Development Account <input type="checkbox"/> Final Performance and Evaluation Report									
<b>Line</b>	<table border="1"> <tr> <th>Total Estimated Cost</th> <th>Revised <sup>2</sup></th> <th>Obligated</th> <th>Total Actual Cost<sup>1</sup></th> </tr> <tr> <td colspan="4"> <b>Signature of Executive Director</b>            Vivian Bryant, Esq., President/CEO         </td> </tr> </table>	Total Estimated Cost	Revised <sup>2</sup>	Obligated	Total Actual Cost <sup>1</sup>	<b>Signature of Executive Director</b> Vivian Bryant, Esq., President/CEO			
Total Estimated Cost	Revised <sup>2</sup>	Obligated	Total Actual Cost <sup>1</sup>						
<b>Signature of Executive Director</b> Vivian Bryant, Esq., President/CEO									
<table border="1"> <tr> <th>Date</th> <th>Signature of Public Housing Director</th> <th>Date</th> <th>Expended</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </table>		Date	Signature of Public Housing Director	Date	Expended				
Date	Signature of Public Housing Director	Date	Expended						

Part II: Supporting Pages									
PHA Name: Orlando Housing Authority		Grant Type and Number		CHFP (Yes):		Federal FFY of Grant:		2014	
Development Number Name/PIA-Wide Activities		Capital Fund Program Grant No: FL29P004501-14		Replacement housing Factor Grant No:		Total Actual Cost		Status of Work	
General Description of Major Work Categories		Development Account No.		Quantity		Total Estimated Cost		Total Actual Cost	
						Original		Funds Obligated 2	
						Revised 1		Funds Expended 1	
PHA Wide		Operations/Administration		1406.00		\$0.00		\$315,299.07	
		Management Improvements/Salaries		1408.01		\$0.00		\$0.00	
		Off Duty Police/Security		1408.02		\$0.00		\$0.00	
		Employee Benefits		1408.09		\$0.00		\$0.00	
		CSS Carver Park		1408.26		\$0.00		\$0.00	
		Administrative Salaries		1410.01		\$0.00		\$0.00	
		Employee Benefits		1410.09		\$0.00		\$0.00	
		Sundry Admin Expense		1410.19		\$0.00		\$0.00	
		Architectural/Engineering/Inspection		1430.00		\$40,000.00		\$40,000.00	
		Architectural/Engineering/Inspection		1460.00		\$0.00		\$63,596.96	
		Site Improvements-Tree Removal		1450.00		\$80,000.00		\$94,730.00	
		Mold Issues		1460.00		\$200,000.00		\$0.00	
		Non Dwelling Equipment		1475.00		\$0.00		\$5,604.45	
		Moving To Work Demonstration		1492.00		\$215,640.00		\$3,049.00	
		Debt Service		9000.00		\$857,478.00		\$857,478.00	
4-1 Griffin Park		Dwelling Equipment/ Ranges & Refrig		1465.00		\$0.00		\$0.00	
4-2/5 Reeves Terrace		Handicap Accessibility		1460.00		\$513,276.00		\$1,980.00	
4-2/5 Reeves Terrace		Termites		1450.00		\$250,000.00		\$0.00	

1 To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

2 To be completed for the Performance and Evaluation Report.

Part ii: Supporting Pages									
PHA Name: Orlando Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL29P004501-14 Replacement housing Factor Grant No:							
Development Number Name/PIA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Funds Obligated 2	Total Actual Cost	Federal FFY of Grant:	
				Original	Revised 1			Funds Expended 2	Status of Work
4-2/5 Reeves Terrace	Relocation Costs	1495.00	176 Units	\$0.00	\$32,951.00	\$32,951.00	\$29,034.35		CFP
4-2/5 Reeves Terrace	Ceiling Renovations	1460.00	176 Units	\$0.00	\$339,395.55	\$339,395.55	\$196,891.59		CFP
4-3 Carver Park		1450.00		\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-4 Lake Mann		1450.00	210 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-6 Murchison Terrace		1450.00	190 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-9 Ivey Lane		1450.00	184 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-10 Loma Doone	Elevators	1460.00	104 Units	\$0.00	\$260,944.00	\$260,944.00	\$252,210.25		CFP
4-11 Meadow Lake		1450.00	87 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-12 Citrus Square		1450.00	87 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-12a Johnson Manor	Elevators	1460.00	40 Units	\$0.00	\$99,972.00	\$99,972.00	\$99,972.00		CFP
4-13 Omega Apartments	Parking Lot Paving	1450.00	74 Units	\$0.00	\$41,393.97	\$41,393.97	\$41,393.97		CFP
4-14 Marden Meadows		1450.00	45 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-17 Villas at Hampton		1450.00	48 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-18 Villas at Carver Park		1450.00	64 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-19 Landings at Carver Park		1450.00	56 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
				\$2,156,394.00	\$2,156,394.00	\$2,156,394.00	\$2,001,239.64		

1 To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

2 To be completed for the Performance and Evaluation Report.

\$2,001,239.64  
 \$0.00

Part III: Implementation Schedule for Capital Fund Recovery Grant						
PHA Name: Orlando Housing Authority    FLFL29P004501-14						
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Fund Expended (Quarter Ending Date)		Federal FFY of Grant: 2014	
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	Revisions for Revised Target D	
FL 4-1 Griffin Park	5/12/2016		5/12/2018			
FL 4-2/5 Reeves Terrace	5/12/2016		5/12/2018			
FL 4-4 Lake Mann	5/12/2016		5/12/2018			
FL 4-6 Murchison Terrace	5/12/2016		5/12/2018			
FL 4-9 Ivey Lane	5/12/2016		5/12/2018			
FL 4-10 Loma Doone	5/12/2016		5/12/2018			
FL 4-11 Meadow Lake	5/12/2016		5/12/2018			
FL 4-12 Citrus Square	5/12/2016		5/12/2018			
FL 4-12a Johnson Manor	5/12/2016		5/12/2018			
FL 4-13 Omega Apartments	5/12/2016		5/12/2018			
FL 4-14 Marden Meadows	5/12/2016		5/12/2018			
FL 4-17 Hampton Park Villas	5/12/2016		5/12/2018			

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Part 1: Summary									
PIA Name: Orlando Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL-29P004501-15 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2015 FFY of Grant Approval: 2015					
Type of Grant Original Annual Statement (revision no: ) Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report									
Line	Summary by Development Account		Total Estimated Cost		Total Actual Cost <sup>4</sup>				
	Original	Revised <sup>1</sup>	Obligated	Expended					
1	Total non-CFP Funds								
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>		\$0.00	\$425,618.00	\$425,618.00	\$425,618.00			
3	1408 Management improvements		\$0.00	\$0.00	\$0.00	\$0.00			
4	1410 Administration (may not exceed 10% of line 21)		\$0.00	\$0.00	\$0.00	\$0.00			
5	1411 Audit		\$0.00	\$0.00	\$0.00	\$0.00			
6	1415 Liquidated Damages		\$0.00	\$0.00	\$0.00	\$0.00			
7	1430 Fees and Costs		\$0.00	\$0.00	\$0.00	\$0.00			
8	1440 Site Acquisition		\$0.00	\$0.00	\$0.00	\$0.00			
9	1450 Site improvement		\$500,000.00	\$221,383.23	\$221,383.23	\$221,383.23			
10	1460 Dwelling Structures		\$650,618.00	\$0.00	\$0.00	\$0.00			
11	1465.1 Dwelling Equipment—Nonexpendable		\$0.00	\$0.00	\$0.00	\$0.00			
12	1470 Non-dwelling Structures		\$0.00	\$0.00	\$0.00	\$0.00			
13	1475 Non-dwelling Equipment		\$0.00	\$0.00	\$0.00	\$0.00			
14	1485 Demolition		\$0.00	\$0.00	\$0.00	\$0.00			
15	1492 Moving to Work Demonstration - Soft Costs		\$120,000.00	\$0.00	\$0.00	\$0.00			
16	1495.1 Relocation Costs		\$0.00	\$0.00	\$0.00	\$0.00			
17	1499 Development Activities <sup>4</sup>		\$0.00	\$0.00	\$0.00	\$0.00			
18a	1501 Collateralization or Debt Service paid by the PIA		\$0.00	\$636,974.24	\$636,974.24	\$636,974.24			
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment		\$0.00	\$1.00	\$0.00	\$0.00			
18ba	9002 Collateralization or Debt Service paid Via System of Direct Payment		\$857,478.00	\$844,119.53	\$844,119.53	\$844,119.53			
19	1502 Contingency (may not exceed 8% of line 20)		\$0.00	\$0.00	\$0.00	\$0.00			
20	Amount of Annual Grant: (sum of lines 2 - 19)		\$2,128,096.00	\$2,128,096.00	\$2,128,095.00	\$2,128,095.00			
21	Amount of line 20 Related to LBP Activities								
22	Amount of line 20 Related to Section 504 Activities								
23	Amount of line 20 Related to Security - iard Costs								
24	Amount of line 20 Related to Security - iard Costs								
25	Amount of line 20 Related to Energy Conservation Measures								

1 To be completed for the Performance and Evaluation Report.  
2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
3 PIAs with under 250 units in management may use 100% of CFP Grants for operations.  
4 RIF funds shall be included here.

<b>Part I: Summary</b>	
<b>PIA Name:</b> Orlando Housing Authority	<b>Grant Type and Number</b> Capital Fund Program Grant No: FL-29P004501-15 Replacement Housing Factor Grant No: _____ Date of CHFP: _____
<b>FFY of Grant: 2015</b>	
<b>FFY of Grant Approval: 2015</b>	
<b>Type of Grant</b> <input checked="" type="checkbox"/> <b>Original Annual Statement</b> <input type="checkbox"/> <b>Revised Annual Statement (revision no: )</b> <input type="checkbox"/> <b>Performance and Evaluation Report for Period Ending:</b> <input type="checkbox"/> <b>Final Performance and Evaluation Report</b>	
<b>Line</b>	<b>Summary by Development Account</b>
<b>Total Estimated Cost</b>	
<b>Total Actual Cost</b>	
<b>Original</b>	<b>Revised<sup>1</sup></b>
<b>Obligated</b>	
<b>Expended</b>	
<b>Date</b>	
<b>Signature of Executive Director</b>  Vivian Bryant, Esq., President/CEO	
<b>Signature of Public Housing Director</b>  8/1/2016	



Part II: Supporting Pages									
PHA Name: Orlando Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL-29P004-501-15 Replacement housing Factor Grant No:		CFEP (Yes):		Federal FFY of Grant: 2015			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	
				Original	Revised 1	Funds Obligated	Funds Expended		
PHA Wide	Operations/Administration	1406		\$0.00	\$425,618.00	\$425,618.00	\$425,618.00		
	Mold/Termite Inspection	1430		\$0.00	\$0.00	\$0.00	\$0.00		
	Site Improvements	1450		\$0.00	\$0.00	\$0.00	\$0.00		
	Mold issues	1460		\$0.00	\$0.00	\$0.00	\$0.00		
	Non Dwelling Equipment	1475		\$0.00	\$0.00	\$0.00	\$0.00		
	Moving To Work Demonstration	1492		\$120,000.00	\$0.00	\$0.00	\$0.00		
	Collateralization Exp	1501		\$0.00	\$636,974.24	\$636,974.24	\$636,974.24		
	Debt Reserves	9000		\$0.00	\$1.00	\$0.00	\$0.00		
	Loan Debt Obligation	9002		\$857,478.00	\$844,119.53	\$844,119.53	\$844,119.53		
	Termites Remediation	1450		\$500,000.00	\$0.00	\$0.00	\$0.00		
4-1 Griffin Park	Accessibility - Minor modification	1450	171 Units	\$0.00	\$0.00	\$0.00	\$0.00		
	Accessibility - Gut Rehabilitations	1460	171 Units	\$650,618.00	\$0.00	\$0.00	\$0.00		
4-2/5 Reeves Terrace	Accessibility - Minor modification	1450	171 Units	\$0.00	\$0.00	\$0.00	\$0.00		
	Accessibility - Major modification	1460	171 Units	\$0.00	\$0.00	\$0.00	\$0.00		
4-4 Lake Mann	Accessibility - Minor modification	1450	207 Units	\$0.00	\$0.00	\$0.00	\$0.00		
	Accessibility - Major modification	1460	207 Units	\$0.00	\$0.00	\$0.00	\$0.00		
4-6 Murchison Terrace	Accessibility - Minor modification	1450	188 Units	\$0.00	\$0.00	\$0.00	\$0.00		
	Accessibility - Major modification	1460	188 Units	\$0.00	\$0.00	\$0.00	\$0.00		
4-7 Johnson Manor	Accessibility - Minor modification	1450	40 Units	\$0.00	\$0.00	\$0.00	\$0.00		
	Accessibility - Major modification	1460	40 Units	\$0.00	\$0.00	\$0.00	\$0.00		

1 To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
 2 To be completed for the Performance and Evaluation Report.

## Part II: Supporting Pages

PFA Name:		Grant Type and Number			CFFP (Yes):			Federal FY of Grant:							
Orlando Housing Authority		Capital Fund Program Grant No: FL-29P004-501-15						2015							
Development Number Name/P/A-Wide Activities		General Description of Major Work Categories		Development Account No.		Quantity		Total Estimated Cost		Total Actual Cost		Status of Work			
								Original		Revised 1		Funds Obligated		Funds Expended	
4-4-11 Givey Lane		Accessibility - Minor modification		1450		181 Units		\$0.00		\$0.00		\$0.00		\$0.00	
		Accessibility - Major modification		1460		181 Units		\$0.00		\$0.00		\$0.00		\$0.00	
4-4-10 Lorna Doone		Accessibility - Minor modification		1450		104 Units		\$0.00		\$0.00		\$0.00		\$0.00	
		Accessibility - Major modification		1460		104 Units		\$0.00		\$0.00		\$0.00		\$0.00	
4-4-11 Meadow Lake		Accessibility - Minor modification		1450		87 Units		\$0.00		\$0.00		\$0.00		\$0.00	
		Accessibility - Major modification		1460		87 Units		\$0.00		\$0.00		\$0.00		\$0.00	
4-4-12 Citrus Square		Accessibility - Minor modification		1450		87 Units		\$0.00		\$0.00		\$0.00		\$0.00	
		Accessibility - Major modification		1460		87 Units		\$0.00		\$0.00		\$0.00		\$0.00	
4-4-13 Omega Apartments		Accessibility - Minor modification		1450		73 Units		\$0.00		\$221,383.23		\$221,383.23		\$221,383.23	
		Accessibility - Major modification		1460		73 Units		\$0.00		\$0.00		\$0.00		\$0.00	
4-4-14 Marden Meadows		Accessibility - Minor modification		1450		45 Units		\$0.00		\$0.00		\$0.00		\$0.00	
		Accessibility - Major modification		1460		45 Units		\$0.00		\$0.00		\$0.00		\$0.00	
4-4-17 Hampton		Accessibility - Minor modification		1450		48 Units		\$0.00		\$0.00		\$0.00		\$0.00	
		Accessibility - Major modification		1460		48 Units		\$0.00		\$0.00		\$0.00		\$0.00	
4-4-18 Villas		Accessibility - Minor modification		1450		64 Units		\$0.00		\$0.00		\$0.00		\$0.00	
		Accessibility - Major modification		1460		64 Units		\$0.00		\$0.00		\$0.00		\$0.00	
4-4-19 Landings		Accessibility - Minor modification		1450		30 Units		\$0.00		\$0.00		\$0.00		\$0.00	
		Accessibility - Major modification		1460		30 Units		\$0.00		\$0.00		\$0.00		\$0.00	
								\$2,128,096.00		\$2,128,096.00		\$2,128,095.00		\$2,128,095.00	

1 To be completed for tie Performance and Evaluation Report or a Revised Annual Statement.

Part III: Implementation Schedule for Capital Fund Recovery Grant									
PHA Name: Orlando Housing Authority FL29P004501-15									
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Fund Expended (Quarter Ending Date)		Federal FFY of Grant: 2015		Reasons for Revised Target Dates <sup>1</sup>		
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date					
FL 4-1 Griffin Park	4/12/2017		4/12/2019						
FL 4-2/5 Reeves Terrace	4/12/2017		4/12/2019						
FL 4-4 Lake Mann	4/12/2017		4/12/2019						
FL 4-6 Murchison Terrace	4/12/2017		4/12/2019						
FL 4-9 Ivey Lane	4/12/2017		4/12/2019						
FL 4-10 Loma Doone	4/12/2017		4/12/2019						
FL 4-11 Meadow Lake	4/12/2017		4/12/2019						
FL 4-12 Citrus Square	4/12/2017		4/12/2019						
FL 4-12a Johnson Manor	4/12/2017		4/12/2019						
FL 4-13 Omega Apartments	4/12/2017		4/12/2019						
FL 4-14 Marden Meadows	4/12/2017		4/12/2019						
FL 4-17 Hampton Park Villas	4/12/2017		4/12/2019						

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Part I: Summary

PHFA Name: Orlando Housing Authority

Grant Type and Number  
Capital Fund Program Grant No: FL-14P004501-16 Replacement Housing Factor Grant No:  
Date of CFFP:

FFY of Grant:  
2016

FFY of Grant Approval:  
2016

Original Annual Statement  
Performance and Evaluation Report for Period Ending:

Revised Annual Statement (revision no: )  
Final Performance and Evaluation Report

Line	Summary by Development Account	Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>	\$449,605.00	\$449,605.00	\$403,331.00	\$403,331.00
3	1408 Management Improvements	\$302,316.00	\$269,548.19	\$3,388.79	\$3,388.79
4	1410 Administration (may not exceed 10% of line 21)	\$0.00	\$0.00	\$0.00	\$0.00
5	1411 Audit	\$0.00	\$0.00	\$0.00	\$0.00
6	1415 Liquidated Damages	\$0.00	\$0.00	\$0.00	\$0.00
7	1430 Fees and Costs	\$0.00	\$0.00	\$0.00	\$0.00
8	1440 Site Acquisition	\$0.00	\$0.00	\$0.00	\$0.00
9	1450 Site Improvement	\$0.00	\$425,000.00	\$168,102.63	\$168,102.63
10	1460 Dwelling Structures	\$0.00	\$178,429.88	\$0.00	\$0.00
11	1465.1 Dwelling Equipment—Nonexpendable	\$0.00	\$0.00	\$0.00	\$0.00
12	1470 Non-dwelling Structures	\$0.00	\$0.00	\$0.00	\$0.00
13	1475 Non-dwelling Equipment	\$0.00	\$0.00	\$0.00	\$0.00
14	1485 Demolition	\$0.00	\$0.00	\$0.00	\$0.00
15	1492 Moving to Work Demonstration	\$1,407,478.00	\$0.00	\$0.00	\$0.00
16	1495.1 Relocation Costs	\$0.00	\$0.00	\$0.00	\$0.00
17	1499 Development Activities <sup>4</sup>	\$0.00	\$0.00	\$0.00	\$0.00
18a	1501 Collateralization or Debt Service paid by tie PIA	\$0.00	\$32,767.81	\$32,767.81	\$32,767.81
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$0.00	(\$1.00)	\$0.00	\$0.00
19	9002 Collateralization or Debt Service paid Via System of Direct Payment	\$857,478.00	\$804,049.12	\$804,049.12	\$201,013.03
20	1502 Contingency (may not exceed 8% of line 20)				
21	Amount of Annual Grant: (sum of lines 2 - 19)	\$3,016,877.00	\$2,159,399.00	\$1,411,639.35	\$808,603.26
22	Amount of line 20 Related to LBP Activities				
23	Amount of line 20 Related to Section 504 Activities				
24	Amount of line 20 Related to Security - Soft Costs				
25	Amount of line 20 Related to Security - Hard Costs				
26	Amount of line 20 Related to Energy Conservation Measures				

1 To be completed for tie Performance and Evaluation Report.  
2 To be completed for tie Performance and Evaluation Report or a Revised Annual Statement.  
3 PIAs will under 250 units in management may use 100% of CFF Grants for operations.  
4 RIF funds shall be included here.

Orlando Housing Authority

<b>Part I: Summary</b>				<b>FFY of Grant:</b> <b>2016</b>	
<b>PHA Name:</b> Orlando Housing Authority	<b>Grant Type and Number</b> Capital Fund Program Grant No: FL-14P004501-16 Date of CFFP:	Replacement Housing Factor Grant No:			
<b>Type of Grant</b>					
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Final Performance and Evaluation Report		<input type="checkbox"/> Revised Annual Statement (revision no: ( ) <input type="checkbox"/> Final Performance and Evaluation Report	
<b>Line</b>	<b>Summary by Development Account</b>	<b>Total Estimated Cost</b>	<b>Revised <sup>2</sup></b>	<b>Total Actual Cost<sup>4</sup></b>	<b>Expended</b>
<b>Signature of Executive Director</b>		<b>Original</b>	<b>Date</b>	<b>Signature of Public Housing Director</b>	<b>Date</b>
Vivian Bryant, Esq., President/CEO		3/31/2016			

Part 4: Supporting Pages									
PHA Name: Orlando Housing Authority			Grant Type and Number				Federal FFY of Grant:		
Capital Fund Program Grant No: FL-14P004501-16			CFPP (Yes):			Total Actual Cost			Status of Work
Replacement housing Factor Grant No:			Total Estimated Cost			Funds Obligated 2			Funds Expended 2
General Description of Major Work Categories			Development Account No.	Quantity	Original	Revised 1			
Development Number Name/PHA-Wide Activities									
	PHA Wide	Operations/Administration	1406.00		\$449,605.00	\$449,605.00	\$403,331.00	\$403,331.00	CFP
		Management Improvements/Salaries	1408.01		\$302,316.00	\$269,548.19	\$3,388.79	\$3,388.79	CFP
		Off Duty Police/Security	1408.02			\$0.00	\$0.00	\$0.00	CFP
		Employee Benefits	1408.09			\$0.00	\$0.00	\$0.00	CFP
		CSS Carver Park	1408.26			\$0.00	\$0.00	\$0.00	CFP
		Administrative Salaries	1410.01			\$0.00	\$0.00	\$0.00	CFP
		Employee Benefits	1410.09			\$0.00	\$0.00	\$0.00	CFP
		Sundry Admin Expense	1410.19			\$0.00	\$0.00	\$0.00	CFP
		Architectural/Engineering	1430.00			\$0.00	\$0.00	\$0.00	CFP
		Site Improvements	1450.00			\$550,000.00	\$425,000.00	\$145,412.63	CFP
		Dwelling Structures	1460.00			\$0.00	\$125,000.00	\$0.00	CFP
		Non Dwelling Equipment	1475.00			\$0.00	\$22,690.00	\$22,690.00	CFP
		Moving To Work Demonstration	1492.00			\$0.00	\$30,739.88	\$0.00	CFP
		Collateralization or Debt	1501			\$0.00	\$32,767.81	\$32,767.81	CFP
		Debt Reserves	9000			\$0.00	\$0.00	\$0.00	CFP
		Loan Debt Obligation	9002			\$857,478.00	\$804,049.12	\$201,013.03	CFP
	4-1 Griffin Park	VCA - Accessible Units	1465.00	198 Units		\$0.00	\$0.00	\$0.00	CFP
	4-2/5 Reeves Terrace		1450.00			\$0.00	\$0.00	\$0.00	CFP

Part ii: Supporting Pages									
PH/NA Name: Orlando Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL-14P004501-16			CHFP (Yes):			Federal FFY of Grant: 2016	
Development Number Name/PIA-Wide Activities		General Description of Major Work Categories		Replacement housing Factor Grant No: Development Account No.		Quantity		Total Estimated Cost	
								Original	
								Revised 1	
								Funds Obligated 2	
								Total Actual Cost	
								Funds Expended 2	
								Status of Work	
4-3 Carver Park				1450.00		210 Units		\$0.00	
4-4 Lake Mann				1460.00				\$0.00	
4-6 Murchison Terrace						190 Units		\$0.00	
4-9 Ivey Lane				1450.00		190 Units		\$0.00	
4-10 Lorna Doone				1450.00		104 Units		\$0.00	
4-11 Meadow Lake						87 Units		\$0.00	
4-12 Citrus Square						87 Units		\$0.00	
4-12a Johnson Manor						40 Units		\$0.00	
4-13 Omega Apartments						74 Units		\$0.00	
4-14 Marden Meadows						45 Units		\$0.00	
4-17 Villas at Hampton				1450.00				\$0.00	
4-18 Villas at Carver Park				1450.00				\$0.00	
4-19 Landings at Carver Park				1450.00				\$0.00	
								\$2,159,399.00	
								\$2,159,399.00	
								\$1,411,639.35	
								\$808,603.26	

1 To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

2 To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Recovery Grant						
PH/Agency Name: Orlando Housing Authority FL14P004501-16						
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Fund Expended (Quarter Ending Date)		Federal FFY of Grant: 2016	
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	Reasons for Revised Target Dates <sup>1</sup>	
FL 4-1 Griffin Park	4/12/2018		4/12/2020			
FL 4-2/5 Reeves Terrace	4/12/2018		4/12/2020			
FL 4-4 Lake Mann	4/12/2018		4/12/2020			
FL 4-6 Murchison Terrace	4/12/2018		4/12/2020			
FL 4-9 Ivey Lane	4/12/2018		4/12/2020			
FL 4-10 Loma Doone	4/12/2018		4/12/2020			
FL 4-11 Meadow Lake	4/12/2018		4/12/2020			
FL 4-12 Citrus Square	4/12/2018		4/12/2020			
FL 4-12a Johnson Manor	4/12/2018		4/12/2020			
FL 4-13 Omega Apartments	4/12/2018		4/12/2020			
FL 4-14 Marden Meadows	4/12/2018		4/12/2020			
FL 4-17 Hampton Park Villas	4/12/2018		4/12/2020			

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.



Part I: Summary	
PHA Name: Orlando Housing Authority	Grant Type and Number Capital Fund Program Grant No: FL-14P004501-17 Replacement Housing Factor Grant No: Date of CFFP: 8/2018
FFY of Grant: 2017	
FFY of Grant Approval: 2017	

Type of Grant Original Annual Statement Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1 ) <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Original	Revised	Obligated	Total Actual Cost <sup>1</sup>	Expended
1	Total non-CFF Funds	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
3	1408 Management improvements	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
4	1410 Administration (may not exceed 10% of line 21)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
5	1411 Audit	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
6	1415 Liquidated Damages	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
7	1430 Fees and Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
8	1440 Site Acquisition	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
9	1450 Site improvement	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
10	1460 Dwelling Structures	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
11	1465.1 Dwelling Equipment—Nonexpendable	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
12	1470 Non-dwelling Structures	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
13	1475 Non-dwelling Equipment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
14	1485 Demolition	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
15	1492 Moving to Work Demonstration	\$1,360,908.00	\$1,227,626.88	\$0.00	\$0.00	\$0.00
16	1495.1 Relocation Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
17	1499 Development Activities 4	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
18a	1501 Collateralization or Debt Service paid by tie PIA	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$804,048.00	\$804,048.12	\$804,048.12	\$0.00	\$0.00
19	1502 Contingency (may not exceed 8% of line 20)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
20	1503 Rental Assistance Demonstration (RAD)	\$0.00	\$133,281.00	\$133,281.00	\$133,281.00	\$22,214.00
21	Amount of Annual Grant: (sum of lines 2 - 20)	\$2,164,956.00	\$2,164,956.00	\$937,329.12	\$22,214.00	\$22,214.00
22	Amount of line 20 Related to LBP Activities					
23	Amount of line 20 Related to Section 504 Activities					
24	Amount of line 20 Related to Security - Soft Costs					
25	Amount of line 20 Related to Security - Hard Costs					
26	Amount of line 20 Related to Energy Conservation Measures					

1 To be completed for tie Performance and Evaluation Report.  
2 To be completed for tie Performance and Evaluation Report or a Revised Annual Statement.  
3 PIAs with under 250 units in management may use 100% of CFFP Grants for operations.  
4 RIF funds shall be included here.

<b>Part 1: Summary</b>	
<b>PHA Name:</b> Orlando Housing Authority	<b>Grant Type and Number</b> Capital Fund Program Grant No: FL-14P004501-17 Replacement Housing Factor Grant No: _____ Date of CFFP: _____
<b>FFY of Grant:</b> <b>2017</b>	
<b>FFY of Grant Approval:</b> <b>2017</b>	
<b>Type of Grant</b> <input checked="" type="checkbox"/> <b>Original Annual Statement</b> <input type="checkbox"/> <b>Reserve for Disasters/Emergencies</b> <input checked="" type="checkbox"/> <b>Revised Annual Statement (revision no: 1 )</b> <input type="checkbox"/> <b>Performance and Evaluation Report for Period Ending:</b> <input type="checkbox"/> <b>Final Performance and Evaluation Report</b>	
<b>Line</b>	<b>Summary by Development Account</b>
<b>Total Estimated Cost</b>	
<b>Total Actual Cost'</b>	
<b>Obligated</b>	
<b>Expended</b>	
<b>Date</b>	
<b>Signature of Executive Director</b>  Vivian Bryant, Esq., President/CEO	
<b>Date</b>  11/27/2017	
<b>Signature of Public Housing Director</b>	

Part II: Supporting Pages									
PHA Name: Orlando Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL29P004501-17 Replacement housing Factor Grant No:		CFRP (Yes):		Federal FFY of Grant: 2017			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	
				Original	Revised 1	Funds Obligated	Funds Expended		
PHA Wide	Operations/Administration	1406.00		\$0.00	\$0.00	\$0.00	\$0.00		CFP
	Management Improvements/Salaries	1408.01		\$0.00	\$0.00	\$0.00	\$0.00		CFP
	Off Duty Police/Security	1408.02		\$0.00	\$0.00	\$0.00	\$0.00		CFP
	Employee Benefits	1408.09		\$0.00	\$0.00	\$0.00	\$0.00		CFP
	CSS Carver Park	1408.26		\$0.00	\$0.00	\$0.00	\$0.00		CFP
	Administrative Salaries	1410.01		\$0.00	\$0.00	\$0.00	\$0.00		CFP
	Employee Benefits	1410.09		\$0.00	\$0.00	\$0.00	\$0.00		CFP
	Sundry Admin Expense	1410.19		\$0.00	\$0.00	\$0.00	\$0.00		CFP
	Architectural/Engineering	1430.00		\$0.00	\$0.00	\$0.00	\$0.00		CFP
	Site Improvements	1450.00		\$0.00	\$0.00	\$0.00	\$0.00		CFP
	Non Dwelling Equipment	1475.10		\$0.00	\$0.00	\$0.00	\$0.00		CFP
	Moving to Work Demonstration	1492.00		\$1,360,908.00	\$1,227,626.88	\$0.00	\$0.00		CFP
	Debt Service	9000.00		\$804,048.00	\$804,048.12	\$804,048.12	\$0.00		CFP
4-1 Griffin Park	Dwelling Equipment/ Ranges & Refrig	1465.00	198 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-2/5 Reeves Terrace				\$0.00	\$0.00	\$0.00	\$0.00		CFP

1 To be completed for tie Performance and Evaluation Report or a Revised Annual Statement.

2 To be completed for tie Performance and Evaluation Report.

Part II: Supporting Pages									
PHA Name: Orlando Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL29P0004501-17 Replacement housing Factor Grant No:		CFPP (Yes):		Federal FFY of Grant: 2017			
Development Number Name/PIA- Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	
				Original	Revised 1	Funds Obligated	Funds Expended		
4-3 Carver Park				\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-4 Lake Mann			210 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-6 Murchison Terrace			190 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-9 ively Lane			190 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
			190 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-10 Loma Doone			104 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-11 Meadow Lake			87 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-12 Citrus Square	Rental Demonstration Assistance (RAD) - Modernization		87 Units	\$0.00	\$133,281.00	\$133,281.00	\$22,214.00		CFP
4-12a Johnson Manor			40 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
4-13 Omega Apartments			74 Units	\$0.00	\$0.00	\$0.00	\$0.00		CFP
				\$2,164,956.00	\$2,164,956.00	\$937,329.12	\$22,214.00		

1 To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

2 To be completed for the Performance and Evaluation Report.

**PHA Name: Orlando Housing Authority**    **FL29P004501-17**

Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Fund Expended (Quarter Ending Date)		Reasons for Revised Target Dates <sup>1</sup>
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
FL 4-1 Griffin Park	4/1/2016		3/31/2018		
FL 4-2/5 Reeves Terrace	4/1/2016		3/31/2018		
FL 4-4 Lake Mann	4/1/2016		3/31/2018		
FL 4-6 Murchison Terrace	4/1/2016		3/31/2018		
FL 4-9 Ivey Lane	4/1/2016		3/31/2018		
FL 4-10 Lorna Doone	4/1/2016		3/31/2018		
FL 4-11 Meadow Lake	4/1/2016		3/31/2018		
FL 4-12 Citrus Square	4/1/2016		3/31/2018		
FL 4-12a Johnson Manor	4/1/2016		3/31/2018		
FL 4-13 Omega Apartments	4/1/2016		3/31/2018		
FL 4-14 Marden Meadows	4/1/2016		3/31/2018		
FL 4-17 Hampton Park Villas	4/1/2016		3/31/2018		

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Capital Fund Program - Five-Year Action Plan

<b>Part I: Summary</b>						
<b>PHA Name :</b> Orlando Housing Authority		<b>Locality (City/County &amp; State)</b> <input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revised 5-Year Plan (Revision No:      )				
<b>PHA Number:</b> FL004						
<b>A.</b>	<b>Development Number and Name</b>	<b>Work Statement for Year 1 2017</b>	<b>Work Statement for Year 2 2018</b>	<b>Work Statement for Year 3 2019</b>	<b>Work Statement for Year 4 2020</b>	<b>Work Statement for Year 5 2021</b>
	AUTHORITY-WIDE	\$2,164,956.00	\$2,164,956.00	\$2,164,956.00	\$2,164,956.00	\$2,164,956.00

Part II: Supporting Pages - Physical Needs Work Statements (s)			
Work Statement for Year	1	2017	
Development Number/Name General Description of Major Work Categories		Quantity	Estimated Cost

Part II: Supporting Pages - Physical Needs Work Statements (s)			
Work Statement for Year		2	2018
Development Number/Name		Quantity	Estimated Cost
General Description of Major Work Categories			



Part II: Supporting Pages - Physical Needs Work Statements (s)			
Work Statement for Year	3	2019	
Development Number/Name General Description of Major Work Categories		Quantity	Estimated Cost

Part II: Supporting Pages - Physical Needs Work Statements (s)			
Work Statement for Year	4	2020	
Development Number/Name General Description of Major Work Categories		Quantity	Estimated Cost

Part II: Supporting Pages - Physical Needs Work Statements (s)			
Work Statement for Year	5	2021	
Development Number/Name General Description of Major Work Categories		Quantity	Estimated Cost

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages - Management Needs Work Statements (s)			
Work Statement for Year	1	2017	
Development Number/Name General Description of Major Work Categories			Estimated Cost
Housing Authority Wide			
MTW(MTW (1492))			\$2,164,956.00
Subtotal of Estimated Cost			\$2,164,956.00

Orlando Housing Authority

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year	2	2018
Development Number/Name General Description of Major Work Categories		
Housing Authority Wide		Estimated Cost
MTW(MTW (1492))		\$2,164,956.00
Subtotal of Estimated Cost		\$2,164,956.00

Orlando Housing Authority

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year	3	2019
Development Number/Name General Description of Major Work Categories		
Housing Authority Wide		Estimated Cost
MTW(MTW (1492))		\$2,164,956.00
Subtotal of Estimated Cost		\$2,164,956.00

Orlando Housing Authority

Part III: Supporting Pages - Management Needs Work Statements (s)			
Work Statement for Year	4	2020	
Development Number/Name General Description of Major Work Categories			Estimated Cost
Housing Authority Wide			
MTW(MTW (1492))			\$2,164,956.00
Subtotal of Estimated Cost			\$2,164,956.00

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages - Management Needs Work Statements (s)			
Work Statement for Year	5	2021	
Development Number/Name General Description of Major Work Categories			Estimated Cost
Housing Authority Wide			
MTW(MTW (1492))			\$2,164,956.00
Subtotal of Estimated Cost			\$2,164,956.00

Orlando Housing Authority



# SECTION VII

## APPENDIX

## SECTION VII – APPENDIX

### A. Local Asset Management Program

As part of the Orlando Housing Authority's Amended and Restated Moving to Work Agreement, effective January 7, 2011, OHA has designed and implemented its Local Asset Management Program. The OHA is going to continue to implement its local asset management program for its Public Housing Program and describe such program in its Annual MTW Plan. The term "Public Housing Program" means the operation of properties owned or subsidized by the Agency that are required by the U.S. Housing Act of 1937. The Agency's local asset management program includes a description of how it's implementing project-based property management, budgeting, accounting, and financial management and any deviations from HUD's asset management requirements. The OHA describes its cost accounting plan (cost allocation plan) as part of its local asset management program.

The OHA maintains a project-based management approach which includes both the OHA-managed properties and its as privately managed properties, under the Public Housing Program. Project-level budgeting and accounting is maintained for each of these Public Housing properties. In addition, mixed-finance rental community that contains Agency-assisted units under the Public Housing Program are owned, managed and operated by third party partnerships.

The OHA has developed its program to ensure that accounting and financial reporting methods comply with 2 CFR Part 200, Subpart E regarding cost allocations, 2 CFR Part 200, Subpart F regarding audit requirements, and generally accepted accounting practices (GAAP).

OHA's Public Housing Program's local asset management plan applies the following principles related to program costs:

- Costs incurred are deemed reasonable and consistent with the amended Moving to Work Agreement.
  - Costs shall be accorded consistent treatment.
  - Costs shall be determined in accordance with GAAP.
  - Costs are adequately documented.
  - OHA will report results according to HUD MTW guidelines.
- 1) Budgeting and accounting - Operating budgets are developed and maintained annually at the property level. The groupings of like properties in a geographic location are called Asset Management Properties (AMPs). The related accounting activities are maintained at that level as well.
  - 2) Financial management - Financial reporting and analysis is performed and monitored on a monthly basis, at the property level. Financial reporting requirements are in accordance with the amended Moving to Work Agreement as well as 2 CFR Part 200, Subpart E.
  - 3) Cost Allocation Approach - OHA's Amended and Restated Moving to Work Agreement identifies either a "cost allocation" or "fee-for-service" option. OHA utilizes the cost allocation method. OHA is in keeping with 24 CFR 990 and uses property level management, accounting, and budgeting and has established a Central Office Cost Center (COCC). The costs of the COCC are allocated not only to Public Housing, but to the other programs managed by OHA

All direct and indirect costs are charged to the AMPs in accordance with 2 CFR Part 200, Subpart E. A cost may be direct with respect to some specific service or function, but indirect with respect to the final cost objective. Direct costs associated with project activities are allocated to the specific properties receiving the benefit of the expenditure. Direct and indirect costs associated with the COCC are allocated on a reasonable basis and, if allocated to public housing properties, are substantially done using a project unit distribution basis.

The OHA has developed this program to ensure that accounting and financial reporting methods comply with 2 CFR Part 200, Subpart E regarding cost allocations, 2 CFR Part 200, Subpart F regarding audit requirements, and generally accepted accounting practices (GAAP).

### **Cost Allocation Plan**

Under the MTW Agreement, the cost accounting options available to the Agency include either a “cost allocation” or “fee-for-service” methodology. The OHA approached its cost allocation plan with consideration to the entire operation of the Agency including the MTW Program. This cost allocation plan addresses the larger OHA operation as well as the specific information related to the MTW Program.

### **Difference**

The OHA has the ability to define direct costs differently than the standard definitions published in HUD’s Financial Management Guidebook pertaining to the implementation of 24 CFR Part 990.

The OHA is required to describe any differences between the Agency’s Local Asset Management Program and HUD’s asset management requirements in its Annual MTW Plan in order to facilitate the recording of actual property costs and submission of such cost information to HUD.

The OHA determined to implement a cost allocation system that allocates COCC costs to all agency-wide programs. HUD’s Asset Management System focuses primarily on allocating costs to the Asset Management Properties (AMPs) and necessarily to other programs. This Cost Allocation Plan addresses the entire the OHA operation.

## B. Rental Assistance Demonstration (RAD) Program Significant Amendment

### Orlando Housing Authority Significant Amendment to its FY2019 MTW Plan for the Rental Assistance Demonstration (RAD) Program

The Orlando Housing Authority (OHA) is amending its FY2019 MTW Plan because it was a successful applicant for the HUD Rental Assistance Demonstration (RAD) program for the following public housing sites:

Lorna Doone Apartments	104 units
Griffin Park Apartments	171 units
Ivey Lane Apartments	181 units
Reeves Terrace Apartments	224 units (includes The Villas at Hampton Park)
Lake Mann Homes	207 units

As a result, the Orlando Housing Authority will be converting the units at these properties to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-3 Rental Assistance Demonstration (RAD) and any successor Notices. Upon conversion to Project Based Vouchers, the OHA will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2012-32, REV-2. These resident rights, participation, waiting list and grievance procedures are appended to this Amendment as Attachment A. The Orlando Housing Authority will also conduct RAD activities subject to the RAD Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements specified in H 2016-17 PIH 2016-17 [HA] or its successor as applicable ([https://www.hud.gov/sites/documents/16-17HSGN\\_16-17PIHN.PDF](https://www.hud.gov/sites/documents/16-17HSGN_16-17PIHN.PDF)).

Relocation: The relocation plans for each site will vary depending on the scope of rehabilitation or redevelopment. Additionally, the OHA certifies that it is currently compliant with all fair housing and civil rights requirements, including those imposed by any remedial orders or agreements, namely the Section 504 Voluntary Compliance Agreement, dated April 16, 2015 (the VCA). The OHA will incorporate the implementation of the VCA with RAD conversions. The OHA certifies that the RAD conversions comply with all applicable site and neighborhood review standards and that all appropriate procedures regarding site and neighborhood standards have been followed.

The Rental Assistance Demonstration (RAD) Program was designed by HUD to assist in addressing the capital needs of public housing by providing the OHA with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted by the demonstration, and that the OHA also may borrow funds to address their capital needs. The OHA anticipates utilization of Capital Funds in an amount subject to results of pending RAD Physical Conditions Assessments for each site.

Capital Fund Financing Program Loan (CFFP): The OHA has debt under the Capital Fund Financing Program and will work with the lender, Deutsche Bank, to resolve the outstanding debt of which may result in a required loan prepayment from capital funds or other sources. The current debt is \$5,383,239.95.

As a Moving to Work (MTW) agency, the OHA may use its MTW block grant funds to supplement contract rents for the RAD development. In that instance, no additional voucher funding will be provided by HUD. Regardless of any funding changes that may occur as a result of conversion under RAD, the OHA certifies that it will maintain its continued service level requirements.

Most residents will not have a rent increase as a result of RAD conversion. The OHA anticipates that it will phase-in the rent increases for any residents who have them, over a three (3).

Below, please find specific information related to the Public Housing Development(s) selected for RAD:

	<b>Name of Public Housing Development:</b>	<b>PIC Development ID:</b>	<b>Conversion Type (PBV or PBRA):</b>	<b>Transfer of Assistance:</b>
<b>1</b>	<b>LORNA DOONE 1617 W. Central Blvd.</b>	<b>FL004000010</b>	<b>PBV</b>	<b>NONE</b>
	<b>Total Units:</b>	<b>Pre-RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Post RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Capital Fund Allocation of Development:</b>
	104	SENIOR	SENIOR	\$193,609
	<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion</b>	<b>Change in Number of Units per Bedroom Type and Why*</b>
	Studio/Efficiency	60	40	20
	One Bedroom	44	44	0
	* Redevelopment of Lorna Doone will feature elimination of zero bedroom units into larger one bedroom units. Repair or replacement of some major systems, improvements to configuration of common spaces, and other upgrades. All renovation and improvements are subject to the results of a Physical Conditions Assessment.			

	<b>Name of Public Housing Development:</b>	<b>PIC Development ID:</b>	<b>Conversion Type (PBV or PBRA):</b>	<b>Transfer of Assistance:</b>
<b>2</b>	<b>GRIFFIN PARK 520 Callahan Dr.</b>	<b>FL004000001</b>	<b>PBV</b>	<b>TBD</b>
	<b>Total Units:</b>	<b>Pre-RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Post RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Capital Fund Allocation of Development:</b>
	171	FAMILY	TBD	\$351,350
	<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion</b>	<b>Change in Number of Units per Bedroom Type and Why</b>
	Studio/Efficiency	9	9	0
	One Bedroom	53	53	0
	Two Bedroom	58	58	0
	Three Bedroom	48	48	0
	Four Bedroom	3	3	0
	The redevelopment plan for Griffin Park will include demolition and partial redevelopment on site or off site. The number of units may change as redevelopment plans are confirmed.			

	<b>Name of Public Housing Development:</b>	<b>PIC Development ID:</b>	<b>Conversion Type (PBV or PBRA):</b>	<b>Transfer of Assistance:</b>
<b>3</b>	<b>REEVES TERRACE</b> 200 Victor Ave. (171)  <b>THE VILLAS AT HAMPTON PARK</b> 301 N Hillside Ave. (53)	<b>FL004000002</b>	<b>PBV</b>	<b>TBD</b>
	<b>Total Units:</b>	<b>Pre-RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Post RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Capital Fund Allocation of Development:</b>
	224	FAMILY	FAMILY	\$443,697
	<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion</b>	<b>Change in Number of Units per Bedroom Type and Why*</b>
	Studio/Efficiency	N/A	N/A	N/A
	One Bedroom	73	75	+2
	Two Bedroom	79	79	0
	Three Bedroom	62	61	-1
	Four Bedroom	10	8	-2
	OHA will secure private financing for repairs and upgrades to Reeves Terrace to include Section 504 improvements to the units, site and common areas.			
	* The change in units is due to accessibility improvements at Reeves Terrace. For example, a two (d) bedroom unit may be converted to an accessible one (1) bedroom unit.			

	<b>Name of Public Housing Development:</b>	<b>PIC Development ID:</b>	<b>Conversion Type (PBV or PBRA):</b>	<b>Transfer of Assistance:</b>
<b>4</b>	<b>LAKE MANN</b> 624 Bethune Dr.	<b>FL004000004</b>	<b>PBV</b>	<b>TBD</b>
	<b>Total Units:</b>	<b>Pre-RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Post RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Capital Fund Allocation of Development:</b>
	207	FAMILY	FAMILY	\$485,273
	<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion</b>	<b>Change in Number of Units per Bedroom Type and Why</b>
	Studio/Efficiency	0	0	0
	One Bedroom	19	19	0
	Two Bedroom	89	89	0
	Three Bedroom	80	80	0
	Four Bedroom	18	18	0
	Five Bedroom	1	1	0
	OHA seeks to demolish the units at Lake Mann to pave the way for full scale redevelopment of the site to include mixed income housing, site reconfiguration and infrastructure improvements. The number of units may change as redevelopment plans are confirmed.			

	Name of Public Housing Development:	PIC Development ID:	Conversion Type (PBV or PBRA):	Transfer of Assistance:
5	<b>IVEY LANE</b> 24 Fanfair Ave.	<b>FL004000009</b>	<b>PBV</b>	<b>TBD</b>
	<b>Total Units:</b>	<b>Pre-RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Post RAD Unit Type if different (i.e., Family, Senior, etc.)</b>	<b>Capital Fund Allocation of Development:</b>
	181	FAMILY	FAMILY	\$472,274
	<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion Must Define</b>	<b>Change in Number of Units per Bedroom Type and Why*</b>
	Studio/Efficiency	0	0	0
	One Bedroom	17	18	+1
	Two Bedroom	41	42	+1
	Three Bedroom	61	62	+1
	Four Bedroom	36	37	+1
	Five Bedroom	24	20	-4
	Six Bedroom	2	2	0
	<p>OHA will secure private financing for rehabilitation and improvements to Ivey Lane subject to the results of a comprehensive physical conditions assessment.</p> <p>*Ten units are under construction. Units are being rehabilitated to comply with Section 504/UFAS standards which will impact the bedroom sizes/unit mix. For example, a five (5) bedroom unit will be reconfigured into an accessible four (4) bedroom unit.</p>			

## **Special Provisions Affecting Conversions to Project-Based Vouchers (PBVs)**

### **Excerpt from Notice 2012-32, REV-2:**

#### **C. PBV Resident Rights and Participation.**

- 1. No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households.<sup>24</sup> Once that remaining household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement.
- 2. Right to Return.** See section 1.4.A.4(b) regarding a resident's right to return.
- 3. Renewal of Lease.** Since publication of the PIH Notice 2012-32 Rev 1, the regulations under 24 CFR § 983.257(b)(3) have been amended requiring Project Owners to renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.
- 4. Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion. The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "standard TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

Three Year Phase-in:

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

Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP Five Year Phase in:

Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP



Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP

Year 5: Year 5 AR and all subsequent recertifications – Full standard TTP

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

## **5. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency**

**Service Coordinator (ROSS-SC) programs.** Public Housing residents that are current FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any remaining PH FSS funds, to serve those FSS participants who live in units converted by RAD. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the FY15 Appropriations Act), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD. However, PHAs should note that there are certain FSS requirements (e.g. escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100. Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

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

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

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

i. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:

- a. A reasonable period of time, but not to exceed 30 days:
  - i. If the health or safety of other tenants, PHA employees, or persons] residing in the immediate vicinity of the premises is threatened; or
  - ii. In the event of any drug-related or violent criminal activity or any felony conviction;
- b. 14 days in the case of nonpayment of rent; and

c. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

ii. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional procedural rights to comply with section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the Project Owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi),<sup>26</sup> an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.

i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).

inform any additional hearings required under RAD, the Project Owner will perform the hearing.

b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.

c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).

d. The Project Owner provides opportunity for an informal hearing before an eviction. Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

**8. Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion e.g., due to loss of employment; tenants that move into the property following conversion, etc.,) is covered by this waiver.

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

**10. When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may only select an occupied unit to be included under the PBV HAP contract if the unit's occupants are eligible for housing assistance payments (24 CFR §983.53(d)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR §983.258). Since the rent limitation under this Section of the Notice may often result in a family's TTP equaling or exceeding the gross rent for the unit, for current residents (i.e residents living in the public housing property prior to conversion), HUD is waiving both of these provisions and requiring that the unit

for such families be placed on and/or remain under the HAP contract when TTP equals or exceeds than the Gross Rent. Further, HUD is establishing the alternative requirement that the rent to owner for the unit equal the family's TTP until such time that the family is eligible for a housing assistance payment. HUD is waiving as necessary to implement this alternative provision, the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR 983.301 as modified by Section 1.6.B.5 of this Notice.<sup>27</sup> In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP contract. Assistance may subsequently be reinstated if the tenant becomes eligible for assistance. The PHA is required to process these individuals through the Form- 50058 submodule in PIC.

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

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

#### **D. PBV: Other Miscellaneous Provisions**

- 1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
- 2. Additional Monitoring Requirement.** The PHA's Board must approve the operating budget for the Covered Project annually in accordance with HUD requirements.
- 3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** This section has been moved to 1.4.A.13 and 1.4.A.14.
- 4. Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
  - i. Transferring an existing site-based waiting list to a new site-based waiting list. If the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being

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

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

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

CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR §983.251(c).

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

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

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

**8. Administrative Fees for Public Housing Conversions during Transition Period.**

For the remainder of the Calendar Year in which the HAP Contract is effective (i.e. "transition period"), RAD PBV projects will be funded with public housing funds. For example, if the project's assistance converts effective July 1, 2015, the public housing Annual Contributions Contract (ACC) between the PHA and HUD will be amended to reflect the number of units under HAP contract, but will be for zero dollars, and the RAD PBV contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time. For fiscal years 2014 and 2015, PHAs operating HCV program received administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing

Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR § 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBVRAD units. After this transition period, the section 8 ACC will be amended to include section 8 funding that corresponds to the units covered by the section 8 ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

**9. Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance. If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing an alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD. The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan. To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) and 24 CFR part 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

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