

PHILADELPHIA HOUSING AUTHORITY



MOVING TO WORK ANNUAL PLAN FISCAL YEAR 2018 (APRIL 1, 2017 TO MARCH 31, 2018)

FIRST SUBMISSION TO HUD
JANUARY 13, 2017

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APRIL 25, 2017

**PHILADELPHIA HOUSING AUTHORITY
MOVING TO WORK ANNUAL PLAN – FISCAL YEAR 2018**

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I. INTRODUCTION

This Annual Plan provides information on activities planned by the Philadelphia Housing Authority (PHA) under the Moving To Work Demonstration Program (MTW) for PHA Fiscal Year 2018, i.e. the period from **April 1, 2017 to March 31, 2018**.

PHA has been an MTW agency since April 2001, operating under an MTW Agreement with the U.S. Department of Housing and Urban Development (HUD). The MTW Agreement, as amended, describes the authority and flexibility granted to PHA under the MTW program along with the requirements for participation. PHA and HUD have recently extended the MTW Agreement through 2028.

MTW is a demonstration program authorized by Congress, through which PHA and other participating agencies are given the flexibility to waive certain statutes and HUD regulations to design and test approaches for providing housing assistance that address one or more of the following statutory objectives:

- 1) Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- 2) Give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and
- 3) Increase housing choices for low-income families.

In FY 2018 and beyond, PHA plans to continue to substantially transform its properties and programs, and to support the revitalization of Philadelphia's neighborhoods, by leveraging its funding and utilizing flexibility provided by the MTW Agreement in virtually every area of agency operations.

The FY 2018 Annual Plan incorporates HUD's current reporting requirements as detailed in the HUD Form 52900 dated May 2013. Over the course of PHA's participation in the MTW program, the Annual Plan elements have been restructured and modified as needed to comply with HUD's evolving program requirements. HUD has indicated its intention to further modify the MTW Plan requirements in FY 2018.

MTW Long-Term Goals and Objectives

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

- Reform the existing Housing Choice Voucher and Public Housing Programs to improve and increase the supply of quality affordable housing throughout the City of Philadelphia.
- Revitalize neighborhoods where MTW and MTW-eligible residents reside.

- Develop a MTW Family Program to furnish comprehensive family self-sufficiency services to eligible MTW families.
- Establish a Quality of Life Program to promote a living environment that fosters community values, encourages resident participation and positive peer group pressure, and reinforces the responsibilities of public housing residents, voucher participants, voucher landlords, and PHA to one another and to the broader community.
- Establish efficient operating procedures and implement cost-saving strategies.

Under the direction of President and Chief Executive Officer, Kelvin A. Jeremiah, PHA has continued and expanded the use of MTW flexibility in promoting PHA's long-term strategic objectives as described in the Strategic Directions Plan discussed in the FY 2015 Annual Plan. PHA has sharpened its focus on improving performance in core business operational areas including property management, maintenance services and resident services and on expanding partnerships with the City, non-profit agencies and other community stakeholders. The following are the twelve priorities identified in the Strategic Directions Plan, which provide a framework for PHA's activities and resource allocation in FY 2018 and beyond:

1. Preserve and expand the supply of affordable housing available to Philadelphia's residents with low-incomes
2. Achieve excellence in the provision of management and maintenance services to PHA residents
3. Create safe communities in collaboration with neighborhood residents and law enforcement agencies
4. Enhance resident well-being and independence through partnerships for employment, job training, education, health and other evidence-based supportive services
5. Improve access to quality housing choices and opportunity neighborhoods through the Housing Choice Voucher program
6. Incorporate energy conservation measures and sustainable practices throughout PHA operations
7. Improve customer service, streamline operations and create a business model that is data-driven and high performing
8. Conduct PHA business in an open and transparent manner that promotes accountability and access, ensures diversity and adheres to the highest ethical standards
9. Strengthen existing relationships and forge new public, private and philanthropic partnerships to support PHA's strategic goals

10. Make PHA an employer of choice with an accountable, diverse, trained and productive workforce
11. Ensure that PHA is a good neighbor and reliable community partner
12. Encourage innovation and promote PHA's financial health through ongoing participation in the Moving To Work Program

PHA and the City of Philadelphia have recently collaborated on the development of an Assessment of Fair Housing (AFH) Plan in compliance with the December 2015 Affirmatively Further Fair Housing Final Rule, a process that involved PHA residents and a wide range of community stakeholders. The draft AFH Plan, including proposed fair housing priority goals and strategies, was published in October 2016. Modifications were made to the draft based on public input and extensive discussions with stakeholders. The final AFH was submitted to HUD for approval in December 2016. It calls for a balanced approach to fair housing planning, one that encompasses: preservation of existing affordable housing resources; development of new affordable housing throughout the City including in low poverty areas; investments in distressed areas to remove barriers and expand opportunities related to education, job creation and transportation; expansion of PHA's HCV Mobility program to support movement of voucher holders to high opportunity areas in Philadelphia and beyond the city boundaries; enhancements to ongoing fair housing outreach, education and enforcement efforts; implementation of an ongoing local and regional dialogue and planning on fair housing issues; and, ongoing efforts to ensure that all citizens have open and fair access to information on housing programs and services. The AFH goals and strategies are reflected in PHA's FY 2018 MTW Annual Plan, and will help inform PHA's long-term MTW goals and objectives.

FY 2018 Goals and Objectives

PHA plans to implement a coordinated, comprehensive program of capital improvements, housing and neighborhood development activities, maintenance and management initiatives, and resident supportive services in FY 2018. As PHA's funding for FY 2018 is unknown as of the publication date of the MTW Annual Plan, the activities described herein may be modified based on actual funding levels.

MTW activities are defined by HUD as only those activities that specifically require MTW authority or Block Grant flexibility to implement. Highlights of PHA's planned MTW activities include:

- **"6 in 5" Program** – The "6 in 5" initiative encompasses an array of initiatives to develop, acquire or preserve affordable housing in the City of Philadelphia. It involves a range of strategies including PHA-developed projects that provide for redevelopment and/or replacement of obsolete properties; initiatives to ensure the long-term affordability of Low Income Housing Tax Credit (LIHTC) properties; and partnerships with the City, non-profit agencies and local developers on new construction, acquisition and substantial rehabilitation projects. PHA leverages MTW Block Grant and other non-MTW funding to support many of these development projects. In addition to utilizing MTW Block Grant funding, PHA

incorporates MTW flexibility in admissions, continued occupancy and other areas. During this period, an additional 1,540 units will be placed under project-based contracts under the Unit Based program (including RAD conversions) as shown in Table 4.

- ***Neighborhood Transformation at Blumberg/Sharswood*** – PHA’s most ambitious and far reaching development initiative continues to move forward in the Blumberg/Sharswood neighborhood. Spurred on by a HUD Choice Neighborhoods Planning Grant, the Blumberg/Sharswood Transformation Plan involves construction or rehabilitation of 1200 affordable and market-rate units, including 420 homeownership units, at on and off-site locations; revitalization of commercial corridors including construction of a new supermarket; development of a new PHA office facility; creation of new recreational facilities and green space; and, the establishment of a high performing high school. Progress to date includes: all residents have been relocated; obsolete high-rise (with the exception of the Senior Tower) and low-rise family units have been demolished; a 9% Low Income Housing Tax Credit (LIHTC) award was received for Phase I; construction completed on 57 Phase I rental units; use of eminent domain to acquire approximately 1300 mostly vacant lots and/or structures that were predominately tax delinquent properties; firm commitments were received for a new supermarket operator; and, developer RFPs were issued for mixed income housing development on neighborhood sites. Financing for the PHA office facility is expected to be in place by the end of FY 2017. In FY 2018, Phase I is expected to be fully occupied. PHA will also commence rehabilitation of the 96-unit senior tower; select a developer for a planned 400-unit rental and homeownership phase; commence construction on the PHA office facility; commence construction on the new supermarket; and, solicit and evaluate private developer proposals for vacant parcels in the neighborhood.
- ***Norris Homes/North Central Philadelphia Neighborhood Transformation*** – PHA is working in partnership with the City of Philadelphia, public housing residents and other partners to implement a Choice Neighborhood Transformation Plan in the North Central Philadelphia neighborhood that will result in extensive community improvements and construction of 237 rental and 60 homeownership units, of which 147 will be replacement housing. The development is funded through a \$30 million Choice Neighborhoods grant, supplemented by private equity, City of Philadelphia, MTW Block Grant and other funds.
- ***2012 Chestnut Street Redevelopment*** –PHA selected a developer for the redevelopment of the former PHA headquarters site located at 2012 Chestnut Street in FY 2017. The new development, located in a prime neighborhood of Philadelphia, will consist of approximately 200 market rental units, with 20% of the units to be affordable rentals targeted for families earning at or below 60% of Area Median Income, and 7,000 square feet of commercial space. Construction is expected to begin in FY 2018. MTW Block Grant funds will be utilized to support the long-term affordable units.
- ***Homeless Veterans Initiative*** – In FY 2018, PHA will partner with a non-profit organization to add 37 units of project-based housing for veterans at the H.E.L.P. V development in the Northern Liberties neighborhood of Philadelphia. PHA continues to collaborate with the City, the Department of Veterans Affairs, and local non-profit organizations to eliminate homelessness among our nation’s veterans, including maximizing leasing under the Veterans

Affairs Supportive Housing program (VASH) and providing operating support from the MTW Block Grant for new project-based developments such as H.E.L.P. V that provide housing and services for veterans and their families.

- ***Rental Assistance Demonstration (RAD)*** – In FY 2018, PHA will continue its efforts to preserve existing public housing developments, reposition the scattered site portfolio and expand housing opportunities through the Rental Assistance Demonstration (RAD) program. PHA utilizes its MTW Block Grant and MTW programmatic flexibility to support RAD conversions. This includes transferring subsidies through the RAD “transfer of assistance” provision from long-term vacant and uninhabitable scattered sites to new projects developed throughout the City by PHA and other development partners. PHA projects that 1,133 units at 2 existing public housing sites and 13 new transfer of assistance sites will have closed under the RAD program by the end of FY 2017. PHA plans to convert an additional 1,956 public housing units to project-based assistance through RAD in FY 2018.
- ***Energy Performance Contracting*** - The MTW Agreement authorizes PHA, without prior approval from HUD, to enter into new Energy Performance Contracts (EPCs) or modify existing EPCs. As part of efforts to determine the financial feasibility and benefits of an EPC, PHA competitively procured a firm to perform a series of comprehensive energy-related audits which will be completed by the end of FY 2017. In FY 2018, PHA expects to analyze and make decisions about whether to proceed with an EPC and/or other energy investments based on a review of the completed audit reports.
- ***Self-Sufficiency and Youth Development Programs*** – Youth development, adult education, employment and training, financial literacy and nutritional services are among the supportive service programs that will continue to be provided by PHA and a network of partners in FY 2018. PHA will also continue to operate the Jobs Plus Pilot Program at Raymond Rosen, which provides intensive supportive services, job training, job placement and retention efforts focused on work-able residents from the Raymond Rosen community. Additionally, PHA plans to continue its Summer Jobs Program which provides six weeks of employment for youth. PHA will also provide scholarships, afterschool, summer camp, and preschool programming for PHA’s young residents. PHA also plans to continue its Smoke Free Housing program. These initiatives all leverage MTW Block Grant funding to secure additional public and private funding. A critical ongoing objective is for PHA to maximize and leverage its MTW Block Grant investments through innovative partnerships with State, City, and non-profit agencies, universities, and social services organizations. A summary of PHA’s MTW and Non-MTW funded resident services programs is found on Table 11.
- ***HCV Mobility Program*** – The overall goal of PHA’s Mobility Program is to encourage voucher holders to find housing and jobs in areas that provide higher economic, educational, and social mobility opportunities both within and outside of the City of Philadelphia. PHA will continue implementation of the Housing Choice Voucher Mobility Program in FY 2018 and will incorporate portability and homeownership into the program. HUD funded the initial pilot program; however, due to its successes, PHA elected to use MTW funding to continue it indefinitely. Participants are provided with a broad range of supportive services,

housing counseling, and other efforts to promote the successful transition to higher opportunity areas.

- ***Second Chance Initiative*** – PHA will continue to implement a voucher pilot program to provide supportive services and housing subsidies to formerly incarcerated returning citizens that are active participants in good standing with the Eastern District Federal Court Supervision to Aid Reentry (STAR) Program and Mayor’s Office of Reintegration Services (RISE) Program. In FY 2018, PHA will issue permanent tenant based vouchers to graduating participants in the Second Chance program and will look to expand the program to include referrals from the Pennsylvania First Judicial Court ex-offender programs.
- ***Nursing Home Transition*** – The Nursing Home Transition activity continues to provide needed housing opportunities for persons with disabilities who are transitioning from nursing home to community-based settings. In FY 2018 PHA will continue to work with the City and State to provide affordable housing opportunities for people with disabilities.
- ***Rent Simplification Initiatives*** – PHA does not anticipate adding any new rent simplification activities in FY 2018; however, PHA will continue to implement previously approved MTW initiatives that simplify program administration and provide incentives for economic self-sufficiency.
- ***Local FSS Program*** – During FY 2018 PHA will continue to work on the development of modifications to the MTW FSS program. PHA plans to meet with local organizations to determine feasibility of developing a partnership with an outside service provider to coordinate and manage the supportive service and contract portions of the FSS. PHA may also look to establish a partnership with a local provider to develop a financial stability and savings program. PHA’s MTW FSS Program will be open to eligible participants in the HCV, PBV/UBV and PH Programs. The FSS program may include short term incentives such as streamlined escrow calculations and modifications to the Contract of Participation and Individual Training & Service Plan. PHA may submit more specific program waivers in a future MTW Plan.

Along with its MTW implementation activities, PHA will implement other initiatives in FY 2018 that do not specifically require MTW authority or Block Grant flexibility to administer. Highlights of PHA’s planned Non-MTW activities include:

- ***Small Area Fair Market Rent Rule*** - Under HUD’s proposed rule regarding implementation of Small Area Fair Market Rents (SAFMRs), Philadelphia is one of the metropolitan areas likely to be selected to transition from a metropolitan area-wide approach to setting FMRs at the zip code level as a means to expand the options PHA families have to live in higher opportunity neighborhoods. While PHA supports the concept of higher payment standards for higher opportunity areas, it is essential that a transition to a new payment standard model minimize any hardship for current HCV program participants. As the SAFMR methodology does not include new funding, PHA is also concerned that funding may not be sufficient to support the current number of households served in the HCV program. PHA will monitor the

progress of this proposed rule and determine, upon issuance of the final rule, if alternative MTW policies are necessary.

- ***Asset Management*** – PHA’s goal is to more closely align PHA’s asset management to multi-family industry norms, with allowances for the unique features of PHA’s organization and portfolio. In FY 2018, PHA will continue efforts to consolidate and streamline property management and maintenance operations based on asset management principles and in response to funding levels.
- ***Reducing Homelessness Initiative*** – As part of PHA’s commitment to service homeless families and individuals, PHA will continue to actively collaborate with the City, social service and local non-profit agencies on a series of initiatives to reduce and help prevent homelessness. Under the Blueprint to End Homelessness program, in FY 2018, PHA plans to provide 300 housing opportunities annually for formerly homeless families that are leaving transitional housing and 200 hundred housing opportunities for homeless individuals leaving transitional housing.
- ***Right Sizing Occupancy Initiative*** – PHA will continue its efforts to “right size” residents who are currently living in units that are too large for their current family composition. This effort first targeted grossly over-housed families who were over housed by four or more bedrooms. Where PHA has identified appropriate sized units for over-housed families and approved reasonable accommodations are received, the right sizing efforts may be impacted. This initiative is part of PHA’s long-term efforts to ensure that scarce housing resources are used in the most efficient manner possible, while also supporting the scattered site repositioning effort. The program primarily impacts residents of scattered sites. PHA expects that some residents may elect to purchase their homes rather than move, while other homes will be made available for sale or other disposition as residents move to smaller size units.
- ***Improving Access to PHA Programs and Services*** – PHA’s Board–approved Limited English Proficiency Policy continues to serve as the road map to ensure open access to PHA programs to non-English speakers as well as to individuals with hearing/sight disabilities. In FY 2018, consistent with the draft goals of the Assessment of Fair Housing Plan referenced above, PHA will continue to refine its list of vital documents and ensure that such documents are translated into required languages. Other forms may include guidance for translation in required languages so that non-English speaking individuals can obtain important program information.
- ***Lease Enforcement*** – PHA will strengthen its internal efforts to ensure enforcement of all lease provisions, including increasing rent collections and ensuring timely management responses to lease violations. In FY 2018, PHA will develop and implement a new model lease and ACOPs for the PAPMC developments. Residents will be informed and provided an opportunity to comment on the revised policies and lease per program notice requirements.
- ***Better Buildings Challenge*** - PHA has been a participant and partner in the U.S. Department of Energy’s Better Buildings Challenge (BBC) since 2013. In FY 2018, in addition to

potential implementation of an EPC as noted above, PHA will continue implementing a comprehensive series of capital improvement and management activities designed to reduce energy consumption across the entire PHA portfolio by at least twenty percent (20%) over the 2010 base year by 2020.

- ***Smoke Free Initiative*** –PHA is one of the largest Housing Authorities in the country to prohibit smoking at all properties except for designated smoking areas. PHA’s smoke free policy differentiates between residents already living in PHA units as of August 2015 and those who subsequently move into new or rehabilitated units. In FY 2018, PHA will continue to offer smoking cessation programs and enforce the provisions of the Smoke Free policy.
- ***Prudent Fiscal Management and Internal Controls*** – PHA will continue to implement a comprehensive program of internal audit, compliance reviews and fiscal management.
- ***Grants and Grant Opportunities*** – In FY 2018, PHA will administer existing grants and utilize MTW funds where feasible to leverage new grant opportunities. Existing grants include a \$2M grant from Pennsylvania Redevelopment Assistance Capital to support the Sharswood/Blumberg supermarket and PHA office facilities referenced above. PHA will also continue to administer grants including Jobs Plus, Assets for Independence, Choice Neighborhoods, FSS Coordinators, Congregate Housing Services, and Juvenile Reentry Assistance. In FY 2018, PHA will also seek out and work to submit additional funding applications including, but not limited to, the Pennsylvania Dept. of Aging Senior Community Center, ROSS Coordinators, ROSS for Education, Mobility Counseling, Assets for Independence and Choice Neighborhoods Implementation (or successor program) to support full implementation of the Transformation Plan for Blumberg/Sharswood. PHA may partner with the City on the Youth Homelessness Demonstration Project. On all grant opportunities, PHA will determine if any MTW flexibilities are required to implement the program and incorporate such flexibilities into future MTW Plans or Plan amendments.

PHA will periodically review and revise ongoing initiatives (both MTW and non-MTW activities) as needed in response to current conditions and priorities and to take advantage of new/emerging opportunities.

Background on the MTW Annual Plan

As part of each year’s MTW planning process, PHA provides opportunities for residents, PHA staff and the broader community to review the proposed goals, objectives and activities, and to offer feedback. PHA conducted a meeting with resident leadership to discuss its contents and provide opportunities for resident input. PHA posted the draft Plan on its website and provided a thirty day public comment period to allow for resident and general public review. PHA also conducted a public hearing and obtained Board of Commissioners approval prior to submission of the Plan to HUD. See Section VI and Appendix I for additional information.

II. GENERAL OPERATING INFORMATION

A. Housing Stock Information

Planned New Public Housing Units

PHA does not plan to add new public housing units to its inventory in FY 2018.

Table 1: Planned New Public Housing Units During FY 2018

AMP Name and Number	Bedroom Size							Total Units	Population Type	# of UFAS Units	
										Fully Accessible	Adaptable
	0	1	2	3	4	5	6+				
Total Public Housing Units to be Added											
								0			

Planned Public Housing Units to Be Removed from Inventory

As part of its revitalization program and ongoing portfolio assessment and repositioning efforts including conversion of public housing units to project-based assistance under the Rental Assistance Demonstration (RAD) program, in FY 2018, PHA plans to demolish and/or dispose of a projected total of 2,189 units as summarized in Table 2. While Table 2 provides an estimate of the number of units to be removed from the public housing inventory during the Plan Year, the actual number may vary depending on the timetables for HUD and City of Philadelphia approvals, project financing, RAD closings, and other factors.

Table 2: Planned Public Housing Units to Be Removed During FY 2018*

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
PA2-901 Haddington Scattered Sites	16	RAD Conversion
PA2-902 Mantua Scattered Sites	91	RAD Conversion
PA2-903 Kingsessing Scattered Sites	25	RAD Conversion
PA2-904 Germantown Scattered Sites	35	RAD Conversion
PA2-905 Fairhill Square Scattered Sites	68	RAD Conversion
PA2-906 Francisville Scattered Sites	68	RAD Conversion
PA2-907 Ludlow Scattered Sites	36	RAD Conversion
PA2-908 Susquehanna Scattered Sites	74	RAD Conversion
PA2-909 Strawberry Mansion Scattered Sites	92	RAD Conversion

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
PA2-910 Oxford Jefferson Scattered Sites	43	RAD Conversion
PA2-901 Haddington Scattered Sites	9	Demo/Dispo of Nonviable Structures
PA2-903 Kingsessing Scattered Sites	3	Demo/Dispo of Nonviable Structures
PA2-904 Germantown Scattered Sites	4	Demo/Dispo of Nonviable Structures
PA2-905 Fairhill Square Scattered Sites	6	Demo/Dispo of Nonviable Structures
PA2-907 Ludlow Scattered Sites	3	Demo/Dispo of Nonviable Structures
PA2-908 Susquehanna Scattered Sites	9	Demo/Dispo of Nonviable Structures
PA2-909 Strawberry Mansion Scattered Sites	9	Demo/Dispo of Nonviable Structures
PA2-910 Oxford Jefferson Scattered Sites	5	Demo/Dispo of Nonviable Structures
PA2-901 Haddington Scattered Sites	2	Disposition of Vacant Lots
PA2-902 Mantua Scattered Sites	64	Disposition of Vacant Lots
PA2-903 Kingsessing Scattered Sites	23	Disposition of Vacant Lots
PA2-904 Germantown Scattered Sites	36	Disposition of Vacant Lots
PA2-905 Fairhill Square Scattered Sites	253	Disposition of Vacant Lots
PA2-906 Francisville Scattered Sites	159	Disposition of Vacant Lots
PA2-907 Ludlow Scattered Sites	442	Disposition of Vacant Lots
PA2-908 Susquehanna Scattered Sites	100	Disposition of Vacant Lots
PA2-909 Strawberry Mansion Scattered Sites	323	Disposition of Vacant Lots
PA2-910 Oxford Jefferson Scattered Sites	191	Disposition of Vacant Lots

Total Number of Units to be Removed

2189

**Timing for removal of units related to RAD conversions is a variable and is expected to extend beyond the Fiscal Year. Addresses for all scattered site units planned for demo/dispo have been included in the Appendix F to this Plan.*

Planned Rental Assistance Demonstration (RAD) Program Conversions

PHA views the conversion of public housing units to project-based assistance under the RAD program as an important component of its housing preservation and expansion strategy. Through RAD conversion, PHA is able to access critically needed private equity (primarily through the Low Income Housing Tax Credit) and other funds to invest in existing PHA developments as well as to leverage new funding to replace obsolete scattered site units. Table 3 below provides summary information on PHA's current plans to convert existing public housing units through the RAD program in FY 2018. Table 2 also includes information on PHA's plans

to transfer existing public housing assistance from long-term vacant and uninhabitable scattered site units to new developments that will be subsidized through long-term project-based assistance contracts in FY 2018. For informational purposes, Table 3A includes those developments which PHA has converted through the RAD program, as well as the developments PHA expects to convert through the RAD program through the close of FY 2017.

The timetable for RAD conversions extends beyond FY 2018 and continues to be refined in consultation with HUD. The listed projects may be modified in the future, and are subject to approval by HUD and the PHA Board of Commissioners.

PHA is required to prepare a RAD Significant Amendment for each RAD project as part of the HUD approval process. The Significant Amendment process includes a public notice period, a public hearing and approval by the PHA Board of Commissioners prior to submission to HUD. To date, PHA has obtained HUD approval for RAD Significant Amendment to the FY 2015, FY 2016 and FY 2017 Annual Plans for several developments.

As part of this FY 2018 MTW Annual Plan, in Appendix A, PHA has included RAD Significant Amendments for Westpark Plaza and Blumberg Senior Apartments. Additional Significant Amendments for other planned RAD developments will be submitted in the future.

Table 3: Planned Rental Assistance Demonstration Conversions in FY 2018

PIC Dev. # / AMP and PIC Dev. Name	RAD Units	Description
PA2-093 Westpark Plaza	65	Conversion of existing public housing development*
PA2-018 Arch Homes	77	Conversion of existing public housing development
PA2-030 Abbottsford Homes	236	Conversion of existing public housing development
PA2-015 Harrison Plaza	299	Conversion of existing public housing development
PA2-035 Haddington Homes	150	Conversion of existing public housing development
PA2-014 Norris Apartments Phase II	74	Choice Neighborhoods RAD conversion
PA2-014 Norris Apartments Phase III	38	Choice Neighborhoods RAD conversions
PA2-031 Bartram Village	500	Conversion of existing public housing development
PA2-128 MLK Phase I AME	49	Conversion of existing AME public housing development
PA2-136 MLK Phase III AME	45	Conversion of existing AME public housing development
PA2-126 Eight Diamonds	152	Conversion of existing AME public housing development
PA2-127 Spring Garden Mixed Finance AME	86	Conversion of existing AME public housing development
PA2-162 Spring Garden II AME	32	Conversion of existing AME public housing development
PA2-050 Blumberg Senior Tower	96	Conversion of senior tower in existing public housing development
PA2-104 Herbert Arlene Homes	32	Conversion of existing public housing development
PA2-902 Scattered Sites	25	Transfer of assistance to new development at 1315 N.8 th Street
Total Units	1,956	

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

Planned Total Number of RAD Units

1,956

Table 3A: Rental Assistance Demonstration Conversions Completed or Projected to be Completed by the Close of FY 2017

Property Name	RAD Units	Description
2415 N. Broad St.	88	Transfer of Assistance
St John Neumann Place II	52	Transfer of Assistance
H.E.L.P Philadelphia V	37	Transfer of Assistance
New Courtland at St. Bartholomew	42	Transfer of Assistance
Strawberry Mansion	55	Transfer of Assistance
Roberto Clemente House	38	Transfer of Assistance
Lehigh Park I and II	49	Transfer of Assistance
Plymouth Hall (PA2-079)	53	Conversion of existing public housing development
Norris Square	29	Transfer of Assistance
Haddington III	48	Transfer of Assistance
Blumberg Phase I	51	Transfer of Assistance
Southwark Plaza (PA2-121)	470	Conversion of existing AME public housing development
Witherspoon Senior Apartments	60	Transfer of Assistance
Cantrell Place	61	Transfer of Assistance
Total Units	1,133	

Planned New Project-Based Voucher Leasing

PHA provides project-based subsidies to non-profit sponsors and other private property owners through its Unit-Based Leasing and Development (UBV) MTW initiative. Table 4 below provides details on new UBV developments that PHA plans to subsidize during the Plan Year. This includes RAD conversion developments that PHA projects to be under contract in FY 2018. Overall, PHA projects that 1,540 additional units will be placed under contract in FY 2018 and 2,656 units currently under contract will remain as such at the end of FY 2018. PHA anticipates a leasing rate of over 90% for new and existing project-based units at the close of FY 2018. Actual contract/leasing figures may vary based on multiple factors, including contract terminations or suspensions, new projects approved by the PHA Board, HUD RAD processing timetables and other considerations.

Table 4: New Housing Choice Vouchers to be Project-Based During FY 2018

Property Name	Anticipated # of New Vouchers to be Project-Based	Description of Project
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Property Name	Anticipated # of New Vouchers to be Project-Based	Description of Project
Strawberry Mansion	55	New construction in North Philadelphia for low income families – RAD transfer of assistance site
2415 N Broad Street	88	New Construction in North Philadelphia serving homeless individuals - RAD transfer of assistance site
4050 Apartments	20	New construction development located in West Philadelphia for artists
Blumberg Phase I	57	New Construction in Blumberg/Sharswood neighborhood serving low-income families including 51 RAD transfer of assistance and 6 other project-based vouchers
Cantrell Place	61	Substantial rehabilitation development in South Philadelphia for seniors. RAD transfer of assistance.
Centennial Village	23	New Construction and rehab in West Philadelphia serving low-income families
Eight Diamonds	152	Rehabilitation of existing AME family public housing – RAD conversion
Francis House	10	New Construction in West Philadelphia for frail seniors
Haddington III	48	Scattered site rehabilitation in West Philadelphia for homeless and low income families – RAD transfer of assistance site
Help V	37	Rehab in Northern Liberties section of Philadelphia serving veterans and senior veterans - RAD transfer of assistance site
Lehigh Park I & II	49	Rehab of existing housing serving low-income families– RAD transfer of assistance site
Liddonfield	300	New Construction in Northeast Philadelphia for seniors
MLK Phase I AME	49	RAD conversion of existing AME units
MLK Phase III AME	46	RAD conversion of existing AME units
Mt. Vernon	15	Rehabilitation of a site located at 3202 Mantua Avenue in the Mantua section of West Philadelphia serving low income families.
New Courtland at Allegheny II	40	New Construction in North Philadelphia serving seniors
New Courtland at St. Barts	42	New construction in Northeast Philadelphia for seniors – RAD transfer of assistance site
Norris Homes Phase II	74	RAD conversion of Choice Neighborhood public housing units (new construction replacement units)
Norris Square	29	Rehabilitation of existing family units in North Central Philadelphia – RAD transfer of assistance site
Plymouth Hall	53	Rehab of existing PH. RAD conversion
Roberto Clemente House	38	Substantial rehabilitation development in North Philadelphia serving low-income families - RAD transfer of assistance site
Spring Garden II AME	32	Rehabilitation of existing AME scattered site family public housing – RAD conversion
Spring Garden Mixed Finance AME	86	Rehabilitation of existing AME scattered site family public housing – RAD conversion
St. John Neumann Place II	52	New Construction in South Philadelphia serving seniors - RAD transfer of assistance site
Tioga Family Center	24	New Construction in North Philadelphia for low income families
Witherspoon Senior Apartments	60	Substantial rehab in West Philadelphia serving seniors. RAD transfer of assistance site

Anticipated Total New Vouchers to be Project-Based

1,540

Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year

4,196

Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year

3,860

Other Planned Changes to Housing Stock

In FY 2018, PHA’s development efforts under the “6 in 5”, RAD and other development initiatives will continue to be guided by development principles approved by the PHA Board in September 2012. The development principles provide the framework for future development activities undertaken with public and private partners; clarifies the selection and review processes; and, provides guidance on PHA’s commitment to Section 3 jobs, sustainable development, defensible space principles, and other important issues. In light of funding constraints, PHA’s policy also emphasizes the importance of achieving maximum leverage with limited public funds.

PHA’s development efforts also support the goals established in the draft Assessment of Fair Housing Plan jointly issued by the City and PHA in October 2016. These goals emphasize the importance of a balanced approach to fair housing including preservation of existing housing, development of new affordable rental and homeownership housing, investments to improve the quality of life in distressed neighborhoods, and mobility initiatives to support housing in high opportunity areas.

Working in collaboration with the City of Philadelphia, PHA will continue to further the shared goal of creating significant new affordable housing opportunities citywide. Table 5 provides a summary of other housing and neighborhood revitalization activities planned by PHA that are not specifically highlighted elsewhere in the Plan, including initiatives in support of the City of Philadelphia’s affordable rental and homeownership goals. In addition, Appendix E includes PHA’s Asset Management Table, which is periodically updated to provide an overview of planned or potential development, disposition, conversion and/or homeownership activities at PHA sites.

Table 5: Other Planned Changes to Housing Stock

Site	Description of Project
Brooklyn Heights	PHA is negotiating the acquisition (PRA) of land in the Mill Creek neighborhood to develop approximately 32 units.
Union Hill	PHA is negotiating the possible acquisition of 12 distressed units in the Mantua neighborhood.
Market West	PHA is working to acquire vacant sites in Haddington neighborhood to develop affordable sites in this West Philadelphia neighborhood.
Gordon Street Phase II (Strawberry Mansion)	PHA is planning for the second phase development to support the newly developed Gordon Apartments.
Falls Ridge	PHA is finalizing plans for a long-term lease to Pennrose Properties of land at the former Schuylkill Falls public housing development. Land to be developed as affordable and market rate housing by Pennrose.
27 th and Susquehanna	PHA is seeking to acquire a site in the Strawberry Mansion neighborhood.
Reynolds School	PHA acquired a school for potential redevelopment as senior housing, a school, or other mixed use development in the Sharswood neighborhood.
Walton School	PHA acquired a vacant school for reuse as 45 senior housing units in Strawberry Mansion.

Site	Description of Project
Sharswood Acquisition	PHA continues to acquire privately owned parcels in the Sharswood neighborhood for the redevelopment of the Norman Blumberg development.
Liddonfield	PHA is currently finalizing a sales agreement with the selected developer who plans to build 300 rental units on the site.
2012 Chestnut Street	In October 2016, PHA announced the selection of a private developer (Alterra Property Group) to develop the vacant, former PHA headquarters site at 2012 Chestnut Street into approximately 200 units of housing including 160 market and 40 units targeted to households with incomes at or below 60% of Area Median Income. The development will also include 7,000 square ft. of commercial space. The developer was chosen through an RFP process.
Bartram Village	PHA is reviewing development proposals for the redevelopment of Bartram Village.
Vaux School	Proposed acquisition of vacant school site for Sharswood development. Educational or residential uses being developed.
Strawberry Mansion (RFP)	Acquisition of 8 H/O Units in Strawberry Mansion area

General Description of Planned Capital Expenditures

PHA's capital planning and development strategies are designed to support, rehabilitate, and modernize existing PHA sites and to revitalize neighborhoods throughout the City. Coordination with the City of Philadelphia's neighborhood revitalization efforts continues to be a priority for PHA. PHA works to leverage its limited PHA resources with other resources such as Low Income Housing Tax Credits, private equity, and state and local funding sources. Utilization of MTW Block Grant funding and programmatic flexibility remains a critical element in PHA's modernization and development efforts.

PHA maintains updated physical needs assessments including estimated replacement and/or repair costs for all PHA developments. Capital needs continue to dramatically exceed available funding.

Table 6 provides information on PHA's planned capital and development expenditures for FY 2018. Pursuant to the MTW Agreement, PHA may, at its discretion and without prior HUD approval, utilize the force account method to conduct capital improvements during the Plan year. Note that PHA is required to submit this Annual Plan in advance of receipt of federal funding information for the fiscal year. In light of the uncertainty of future funding, the information on Table 6 is preliminary and subject to change based on actual funding and other factors. Actual obligations and expenditures may vary based on factors such as construction schedules, timing of HUD and local approvals, availability of leveraged funding and new and emerging repair needs. Note also that capital projects often are implemented over multiple years and may involve multiple funding sources.

Table 6: Planned Capital Expenditures During FY 2018

Site Name	Description	Total Estimated Budget	Estimated FY 18 Capital Fund Expenditures
Blumberg	Phase II (Senior Tower) - 96 units	\$ 21,900,739	\$ 10,000,000
Blumberg	Modular 83 Units	\$ 26,593,413	\$ 5,000,000

Site Name	Description	Total Estimated Budget	Estimated FY 18 Capital Fund Expenditures
Blumberg	Phase III (Off-Site) - New construction of approximately 400 rental and homeownership units	\$ 120,000,000	\$ 5,000,000
Blumberg	Streets & Infrastructure	\$ 9,000,000	
Blumberg	Scattered Site Demolition & Stabilization	\$ 8,400,000	\$ 7,000,000
Blumberg Reynolds School Conversion	Reynolds School Acquisition - Adaptive Reuse (60 Units)	\$ 21,000,000	\$ 1,000,000
Strawberry Mansion	Strawberry Mansion Street Planning - New Construction of 55 Affordable Housing Units	\$ 20,000,000	\$ 5,000,000
Arlene Homes	RAD Conversions	\$ 3,000,000	\$ 3,000,000
Plymouth Hall	RAD Conversions	\$ 3,065,146	\$ 3,065,146
West Park Plaza	RAD Conversions	\$ 9,281,164	\$ 4,000,000
Collegeview	Sanitary upgrade	\$ 900,000	\$ 900,000
Community Centers	Lawful Occupancy (As determined by A&E Consultant)	\$ 250,000	\$ 250,000
District 3	20 New Units	\$ 8,000,000	\$ 4,000,000
District 4	20 New Units	\$ 8,000,000	\$ 4,000,000
Emlen Arms	Roof Replacement	\$ 150,000	\$ 130,000
Haddington (901)	Comprehensive SS Unit Rehabilitation	\$ 600,000	\$ 600,000
Mantua (902)	Comprehensive SS Unit Rehabilitation	\$ 600,000	\$ 600,000
Kingsessing (903)	Comprehensive SS Unit Rehabilitation	\$ 600,000	\$ 600,000
Germantown/Hunting Park (904)	Comprehensive SS Unit Rehabilitation	\$ 600,000	\$ 600,000
Fairhill Square (905)	Comprehensive SS Unit Rehabilitation	\$ 600,000	\$ 600,000
Francisville (906)	Comprehensive SS Unit Rehabilitation	\$ 600,000	\$ 600,000
Ludlow (907)	Comprehensive SS Unit Rehabilitation	\$ 600,000	\$ 600,000
Susquehanna (908)	Comprehensive SS Unit Rehabilitation	\$ 600,000	\$ 600,000
Strawberry Mansion (909)	Comprehensive SS Unit Rehabilitation	\$ 600,000	\$ 600,000
Oxford Jefferson (910)	Comprehensive SS Unit Rehabilitation	\$ 600,000	\$ 600,000
Haddington (901)	SS Repairs/Replacements/Upgrades	\$ 237,500	\$ 237,500
Mantua (902)	SS Repairs/Replacements/Upgrades	\$ 237,500	\$ 237,500
Kingsessing (903)	SS Repairs/Replacements/Upgrades	\$ 237,500	\$ 237,500
Germantown/Hunting Park (904)	SS Repairs/Replacements/Upgrades	\$ 237,500	\$ 237,500
Fairhill Square (905)	SS Repairs/Replacements/Upgrades	\$ 237,500	\$ 237,500
Francisville (906)	SS Repairs/Replacements/Upgrades	\$ 237,500	\$ 237,500
Ludlow (907)	SS Repairs/Replacements/Upgrades	\$ 237,500	\$ 237,500
Susquehanna (908)	SS Repairs/Replacements/Upgrades	\$ 237,500	\$ 237,500
Strawberry Mansion (909)	SS Repairs/Replacements/Upgrades	\$ 237,500	\$ 237,500

Site Name	Description	Total Estimated Budget	Estimated FY 18 Capital Fund Expenditures
Oxford Jefferson (910)	SS Repairs/Replacements/Upgrades	\$ 237,500	\$ 237,500
Harrison Plaza	Water Penetration Need	\$ 5,000,000	\$ 5,000,000
Harrison Plaza	Fire Protection	\$ 300,000	\$ 300,000
Hillcreek	Roof Replacement	\$ 526,000	\$ 526,000
Hillcreek	Continued Upgrade for Building Distribution	\$ 2,000,000	\$ 2,000,000
Johnson Homes	Tub Diverter Replacement	\$ 500,000	\$ 500,000
Katie B Jackson	Roof Replacement Drainage and Flashing	\$ 130,000	\$ 130,000
Markoe Street	Phase III - Development of 6 residential units	\$ 1,000,000	\$ 1,000,000
Millcreek	LEB Community Center	\$ 6,011,386	\$ 4,000,000
Mount Olivet	Exterior Envelope and Moisture Protection	\$ 500,000	\$ 500,000
Norris Choice	Phase II 89 Rental	\$ 35,600,000	\$ 1,000,000
PHA WIDE	504 Unit Modifications/Fair Housing	\$ 900,000	\$ 900,000
Queen Lane	Queen Lane - Low Rise	\$ 600,000	\$ 600,000
Spring Garden	Mechanical Upgrade for Underground and Building Distribution	\$ 2,500,000	\$ 2,500,000
Total:		\$ 323,482,848	\$ 79,676,146

Table 6A below is provided for informational purposes. It is a current list of additional planned capital projects and total budget estimates. This includes projects expected to be implemented in future years, but for which expenditures are not likely to begin in FY 2018. The listing of proposed projects and estimated budgets is preliminary and subject to change. With regards to the Blumberg Revitalization and as part of PHA's long-term strategy to consolidate PHA's operations, PHA has approximately \$45 million budgeted to acquire, and construct an administrative office facility. This is planned on the Ridge Avenue corridor and will be part of the mixed use redevelopment undertaking. This facility will ensure greater efficiency of operations for PHA departments, which are currently located in multiple locations throughout the City of Philadelphia. This consolidation will likely involve disposition or conveyance of existing administrative facilities. PHA may utilize bond financing through the Operating Fund Financing Plan for the administrative office facility project subject to HUD approval.

Table 6A: Additional Planned Capital Projects and Estimated Budget

Site Name	Description	Total Budget
Blumberg	Residential Phase V-X	\$ 348,800,000
Blumberg	New Grade School	\$ 24,000,000
Blumberg	Blumberg Commercial Development	\$ 40,000,000
Blumberg	Office Consolidation	\$ 45,000,000
Westpark Apartments	Upgrades/Modernization	\$ 76,000,000
Harrison	RAD Conversions	\$ 74,750,000
Abbottsford	RAD Conversions	\$ 58,750,000

Site Name	Description	Total Budget
Westpark Plaza	RAD Conversions	\$ 16,250,000
Haddington Homes	RAD Conversions	\$ 36,750,000
Arch Homes	RAD Conversions	\$ 29,200,000
Bartram Village Redevelopment	Redevelopment/RAD Conversion	\$ 199,600,000
Abbottsford	RAD Conversions	\$ 8,755,109
Mantua	Promise Zone: Union Hill (10), West (53) - 63 units total	\$ 25,200,000
Millcreek Extension	Brooklyn Heights (26), 48th to 52nd Streets	\$ 30,400,000
Norris Choice	Phase I 25 H/O	\$ 10,000,000
Norris Choice	Phase III-V	\$ 73,200,000
West Market Developments	Mixed Use Developments at: 5900 Market, 5700 Market, 60th Haverford, 55th Haverford, Salvation Army Site	\$ 60,000,000
Paschall Link	Development of Affordable Housing (50-55 Units)	\$ 20,000,000
Gordon Street Extension	Development of Affordable Housing (50-55 Units)	\$ 20,000,000
Strawberry Mansion	Strawberry Mansion - Learning Center	\$ 4,000,000
PHA Wide	GPNA	\$ 600,000
2700 Susquehanna	Development of Mixed Use	\$ 24,000,000
Ludlow Extension	Develop Affordable Housing (50-55 Units)	\$ 20,000,000
Oxford Village	Sanitary Upgrade	\$ 3,650,000
PHA WIDE	Conventional Fire Units Rehab	\$ 1,200,000
PHA WIDE	LED Site lighting upgrades	\$ 250,000
Conventional	Civil - Repair and replacement of exterior fences, roof, asphalt and concrete at various sites	\$ 3,496,991
Wilson Park	Water Penetration Need	\$ 3,069,111
Bartram Village	Domestic Hot/Cold Water Boiler; Domestic Hot/Cold Pumps	\$ 410,000
Bartram Village	Window Replacement	\$ 2,200,000
Collegeview	Main Service & Distribution Panels	\$ 490,000
Collegeview	Cold Water Lines; Domestic Water Piping; Heating Hot Water Piping	\$ 610,200
Conventional	Electrical - Repair replace / upgrade electrical systems and lighting	\$ 269,735
Conventional	Mechanical - HVAC Upgrades repair, replace or refurbish air conditioning units. Including chillers, roof top package units, window AC units, exhaust fans, DX split units at various sites	\$ 1,250,595
Fairhill	Fire Protection Riser	\$ 600,000
GGFE	HVAC Controls Upgrade	\$ 80,000
Harrison Plaza	HVAC Upgrade - Low Rises Unit Heater Replacement (RAD Conversion)	\$ 500,000
Hillcreek	Retaining Walls	\$ 75,000
Holmecrest	New Underground Heating Distribution	\$ 1,001,100

Site Name	Description	Total Budget
Johnson Homes	Weatherization for Basements	\$ 350,000
Johnson Homes	Windows - Townhouses & Lintils	\$ 3,728,125
Johnson Homes	Gas Lines, Sanitary Lines, Storm Sewer Structures & Laterals, Heating Pumps, Gas Piping	\$ 5,861,080
Mantua LP	Electrical Upgrades (Surge Protection)	\$ 100,000
Morton Homes	Roof Covering	\$ 284,733
Oxford Village	Siding	\$ 846,720
PHA WIDE	Playground Equipment Upgrades (Abbottsford, Johnson, Morton, Spring Garden, West Park)	\$ 145,000
Raymond Rosen	Fencing	\$ 332,813
Raymond Rosen	Vinyl Siding	\$ 238,331
Raymond Rosen	Sanitary Lines & Vent Piping, Storm Sewer Structures & Laterals	\$ 5,241,700
Spring Garden	Metal Stair Replacement (& Miscellaneous)	\$ 90,000
Spring Garden	Electrical Distribution/Panels	\$ 1,500,000
Suffolk Manor	Water Penetration Need	\$ 1,000,000
West Park Apartments	Elevator Upgrades	\$ 7,654,175
Wilson Park	Emergency System Upgrade - For Emergency Generator and Lighting	\$ 1,000,000
Wilson Park	Sanitary Lines & Vent Piping, Storm Sewer Structures & Laterals	\$ 5,569,350
Total		\$ 1,298,349,868

B. Leasing Information

PHA's core business involves management and oversight of approximately 13,000 public housing units and almost 19,000 Housing Choice Vouchers. As units convert from public housing to RAD, each public housing unit converted under RAD will result in an additional HCV unit post conversion.

- The Public Housing inventory includes units for families, seniors, and people with disabilities located at conventional and scattered site properties. It also includes properties managed by Alternatively Managed Entities (AMEs) and the Philadelphia Asset and Property Management Corporation (PAPMC). PHA's inventory includes some units that are not available for occupancy because: (i) they have been approved for demolition or disposition but the demolition or disposition has not yet taken place; (ii) they have been scheduled for significant levels of modernization; (iii) they are utilized for administrative or resident services purposes; or (iv) they are eligible for other HUD-authorized exclusions.
- The Housing Choice Voucher program inventory changes from year to year and includes MTW tenant-based vouchers as well as vouchers authorized by HUD for special purposes

such as the Veterans Affairs Supportive Housing Program, Family Unification Program, SRO Moderate Rehab and Mainstream programs. Periodically, HUD issues Enhanced Vouchers and Tenant Protection Vouchers for PHA to administer. As allowed by the MTW Agreement, PHA incorporates Enhanced and Tenant Protection Vouchers into the MTW block grant when eligible.

Table 7 below provides information only on households living in “MTW units” that PHA plans to serve during FY 2018. This includes all households residing in PHA public housing units as well as HCV MTW households. All of PHA’s public housing units are “MTW units”. Although not required by HUD, PHA has included Table 7A which identifies non-MTW households served. The actual number of household served may vary. PHA anticipates that it will continue to target a utilization rate above 90% in FY 2018, subject to funding availability. The conversion of public housing to project-based assistance under RAD began in FY 2017 and will continue in FY 2018. The number of public housing and HCV families served may be impacted by the RAD conversion schedule.

Table 7: Planned Number of Households Served at End of FY 2018

MTW Households to be Served Through:

Federal MTW Public Housing Units to be Leased
 Federal MTW Voucher (HCV) Units to be Utilized
 Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs
 Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs
Total Households Projected to be Served

Planned Number of Households to be Served	Planned Number of Unit Months Occupied/Leased
13,207	158,484
18,812	225,744
0	0
0	0
32,019	384,228

Table 7A: Non-MTW Voucher Programs: Planned Number of Households Served at End of FY 2018

Non-MTW Program

Mainstream
 VASH
 Moderate Rehab
 SRO
Total Households Projected to be Served

Planned Number of Households to be Served	Planned Number of Units Months Occupied/Leased
125	1,500
703	8,436
193	2,316
337	4,044
1,358	16,296

Reporting Compliance with Statutory MTW Requirements

PHA is in compliance with its MTW statutory requirements.

Description of Anticipated Issues Related to Leasing

Public Housing Program – RAD conversions are expected to continue in FY 2018. As such, actual leasing figures for public housing may be impacted by the schedule of development

activities and relocation timetables. This in turn may result in scheduling changes or delays in re-occupancy and relocation activity that may ultimately impact leasing levels.

Housing Choice Voucher - Leasing of HCV units in opportunity areas continues to be a high priority. PHA implemented a mobility program in August 2013. Mobility program staff conduct outreach and marketing and provide voucher holders with housing counseling and training before, during and after moves. PHA anticipates assisting approximately 55 clients in FY 2018 to find units in opportunity areas. As part of the recently issued draft Assessment of Fair Housing Plan, PHA established a goal of enhancing and expanding the mobility initiative. The program was initially funded by HUD; however, PHA is continuing the program utilizing MTW Block Grant funds.

C. Waiting List Information

PHA administers its waiting lists in accordance with the Housing Choice Voucher Program Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP) as applicable. In 2014, PHA centralized the administration of site based waiting lists for the Conventional and Scattered Site program areas under the Public Housing Admissions Department. This change was made to ensure consistent and efficient management of applicants on the various waitlists.

PHA operates its waiting lists in a nondiscriminatory manner that seeks to avoid unintended discriminatory effects. PHA affirmatively markets its sites in a variety of venues and periodicals to ensure that the public is aware of the availability of PHA housing. PHA treats all applicants in a non-discriminatory manner. PHA also monitors its waiting lists to determine if there are significant changes in the percentage of protected classes and, if there were, would determine whether its affirmative marketing methods should be modified.

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

Table 8: Wait List Information Projected for Beginning of FY 2018

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	Other	29,293	Partially Open	No
Federal MTW Public Housing Units ****	Site-Based	35,544	Open	Yes
Federal MTW Housing Choice Voucher Program	Community-Wide	13,349	Partially Open	No

* *Select Housing Program*: Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

** *Select Wait List Types*: Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for

Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

*** For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

****Units funded with LIHTC and managed by PAPMC

Information on Partially Open Wait Lists

Public Housing wait lists are currently only open to applicants that require wheelchair accessible units; applicants aged 55 and older; and applicants referred to PHA from external agencies with whom PHA has a referral agreement as described in the ACOP (i.e. Blueprint to End Homelessness and others)
The HCV wait list is closed except for applicants who qualify for admission under HUD’s Special Purpose Voucher programs including VASH, as well as applicants referred to PHA from external agencies with whom PHA has a referral agreement as described in the Administrative Plan
N/A

Information on Local, Non-Traditional Housing Programs

N/A
N/A
N/A

Description of “Other” Wait List Type

As specified in the ACOP, PHA’s Public Housing wait list combines site-based, first available, and centrally managed wait list features. Public Housing developments have site-based waiting lists that are centrally managed by the Public Housing Admissions Department. This change was made to ensure consistent and efficient management of applicants on the various waitlists. Applicants may select specific sites or “first available” unit citywide. Centrally managed waitlists, administered by the Admissions Department, also include applicants that require a wheelchair accessible unit and those with a preference designation such as the Blueprint program.

Planned Wait List Organizational or Policy Changes

PHA currently has sufficient applicants on the waiting list to support full occupancy of units that are available for occupancy. PHA will continue to monitor the number of households on each waiting list to ensure an adequate number of applicants. As needed, PHA will open waiting lists and/or undertake affirmative marketing activities to ensure appropriately sized waiting lists for all unit types, sizes and developments. The following is a summary of wait list policy/organizational changes planned for FY 2018:

- PHA may update one or more of its waiting lists in FY 2018. Waiting list updates will be completed in accordance with applicable ACOP/Administrative Plan policies.
- PHA continues to evaluate implementation of new preferences that incorporate employment, educational, and/or job training requirements as a condition of occupancy for designated newly rehabilitated and/or constructed units. Seniors and people with disabilities will be exempt from employment requirements, if applicable. The policy will include provisions to address residents with temporary disabilities and/or temporary loss of employment. PHA may modify its ACOP in FY 2018, subject to Board approval, to

reflect these new preferences. To the extent that any such modifications require MTW authority, PHA will establish appropriate MTW activities for HUD approval in future Plans.

- When a public housing development for which PHA maintains a Site Based Waiting List (SBWL) is converted under RAD to Project Based (PB) Assistance, PHA will transition the existing public housing SBWL to a PB SBWL pursuant to the approved, relevant RAD significant amendment. Applicants will retain their date and time of application and PHA will provide notification to said applicants. After the initial waiting list has been established, PHA shall administer its waiting list for the converted project in accordance with the policies in its Administrative Plan.
- When PHA converts a new or existing public housing development under RAD which does not have an existing SBWL, PHA will establish a waiting list and will follow the policies in its Administrative Plan regarding establishing and administering the waiting list.
- Where RAD conversion activities result in extended periods of time where PHA will not be leasing units, PHA will establish a wait list policy to allow applicants who are only on the affected SBWL to select one additional SBWL while retaining their date and time of application. Additionally, if conversion activities result in PHA no longer offering certain sized units at a site, PHA will establish a policy whereby applicants affected by the unit size change would be able to select one new SBWL while retaining their date and time of application. These wait list policies do not require MTW authorization.
- In furtherance of the fair housing goals proposed in the recently issued draft Assessment of Fair Housing (prepared jointly by PHA and the City), PHA will continue to evaluate its waiting list policies including outreach efforts to ensure open and fair access to all citizens regardless of race, ethnicity or protected class status.

III. PROPOSED MTW ACTIVITIES

There are no proposed new MTW Activities for the FY 2018 MTW Annual Plan.

IV. APPROVED MTW ACTIVITIES

This section of the Annual Plan summarizes and provides a status update on MTW activities that have been previously approved by HUD. As required, this section also includes summary information on MTW activities that have been closed out or placed on hold by PHA. Initiatives are numbered to reflect the fiscal year in which the MTW was initially approved, i.e. MTW Activity 2011-1 was initially approved in FY 2011.

A. Implemented Activities

MTW Activity 2011-1: Partnership Programs Initiative

Description/Update: PHA uses its MTW authority to expand housing options and service models for special needs and other targeted groups in partnership with universities, state and local government, and other stakeholders. This flexible, services-oriented model builds on the previously approved Unit-Based Leasing and Development Program and allows PHA to leverage PHA and partner resources to provide housing options and, where appropriate and feasible, related health care, educational, and/or other necessary services to low-income families and individuals. Authorized features of the initiative include, but are not limited, to the following:

- Admissions and continued occupancy requirements for the initiative may vary from standard public housing or Section 8 requirements and will be determined for each project in order to promote seamless integration of the partner's subsidy sources with MTW block grant funds.
- Partnership initiatives must serve households earning 80% of AMI or below, and PHA's MTW funds may not be used to subsidize households who are not low-income.
- PHA will leverage its funds with other partner resources in order to avoid duplicative services and payments and to maximize the value of funds spent on the Partnership Initiative.
- Potential models include, but are not limited to, domiciliary care for seniors and people with disabilities, housing options for youth including those aging out of foster care, and supportive transitional housing.
- Budgets and agreements between PHA and its partners will adjust subsidy to allow for recoupment of PHA's capital investment as fee income where financially feasible, particularly in situations in which the partner's subsidy is intended to cover all or some housing costs.
- While each development is expected to have different features, programmatic components may include: preferences for specific target populations including referrals from partner agencies; program contracts for participants that may include requirements for case management, participation in services and other requirements; time limits on housing subsidies; modified occupancy standards; availability of stipends; and other components.

PHA projects that this initiative will result in the development of new housing and service delivery programs that address populations which have not been traditionally well-served by existing programs. PHA's intention is to make affordable future development selections in a manner that aligns with the accessibility and special needs housing priorities of the City's Office of Housing and Community Development and the Pennsylvania Housing Finance Agency. To the extent feasible and subject to PHA Board approval, new affordable rental housing development projects that are awarded PHA operating subsidies under the "6 in 5" program must meet the following set-aside requirements: ten percent (10%) Physical disability; four percent (4%) Hearing and Vision disability; and ten percent (10%) Special Needs.

Referrals to PHA and/or project owners for Special Needs units will come from the City of Philadelphia's Deputy Mayor for Health and Opportunities Permanent Supportive Housing Clearinghouse, which shall act as PHA's Local Lead Agency as that term is used by the Pennsylvania Housing Finance Agency (PHFA). The Local Lead Agency is an agency that has (i) experience and responsibility in their jurisdiction for planning and assessing needs for one or more of the above referenced target populations; (ii) responsibility for funding services and organizing the service system to assure tenants get services they need in a timely and comprehensive manner; (iii) the capacity to manage a referral process consistent with fair housing laws; and (iv) be able to enter into an agreement with developers for referrals, pre-tenancy and post-tenancy services and supports. To be eligible for consideration under PHA's ACC program, developers must meet the same definition of 'supportive housing' as required by PHFA, be targeting an eligible population, have an agreement with PHA's Local Lead Agency, and have easy access to transportation services.

This activity was approved in FY 2011, implemented in 2012 and subsequently modified in FY 2013 to incorporate specific components applicable to the youth aging out of foster care partnership with the Philadelphia Department of Human Services (DHS). In August 2012, PHA's Board approved a resolution authorizing PHA to enter into an MOU with DHS to create up to 50 housing opportunities to assist youth aging out of the foster care system. Since inception, PHA has received seventeen (17) referrals and twelve (12) of the referrals have been housed in public housing. PHA intends to continue this initiative in FY 18 offering up to a total of fifty (50) housing opportunities.

In the FY 2014 Annual Plan, PHA discussed its intention to coordinate the Partnership Initiative activities with the "6 in 5" Initiative. Units will be primarily developed or acquired in a three-pronged approach including:

- 1) PHA acting as developer;
- 2) Preservation of affordable units, including those that are nearing the end of the LIHTC compliance period (in partnership with the Pennsylvania Housing Finance Agency) and other units; and
- 3) Open solicitation of development proposals.

In FY 2018, 30 affordable apartments are projected to be completed at 1315 North 8th Street and of those 30 units, 25 are projected to be RAD PBV units using the transfer of assistance

provisions of RAD. The units at North 8th Street are designated for young adults who are homeless or who are at risk of homelessness, some with disabilities, and will also include general occupancy units for persons with low income. The project will be LGBTQ-friendly. Services will be provided by Project HOME including employment, education and health care services.

On an as needed basis, PHA will continue to issue RFPs for unit based assistance.

Proposed Changes to Activity: No changes are proposed that require MTW authority.

Changes to Baseline, Benchmarks, Metrics: There are no changes to baselines. Benchmarks have been updated to reflect planned activities and volumes in FY 2018. PHA will report on outcomes in the MTW Annual Report.

Metrics:

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	25 PBV RAD units by the end of FY 2018		

CE #4: Increase in Resources Leveraged – ALL Planned FY 2018 Projects

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	\$0	\$13 million		

** The HUD Standard Metrics for this activity will depend on the MTW flexibilities required and the type of service provided at each site. As additional agreements with service providers are finalized, further HUD Standard Metrics may be added depending on the terms and necessary flexibilities of the agreements. None of the listed projects for FY18 require MTW waivers at present other than the use of MTW Block Grant funds.*

MTW Activity 2004-1: Neighborhood Development and Revitalization Initiatives

Description/Update: PHA utilizes MTW authority to substantially increase housing choices for residents and applicants. PHA strives to implement an ambitious program of new construction, substantial rehabilitation, and modernization designed to revitalize PHA public housing developments, replace distressed housing lost to demolition and lack of capital funds, and improve Philadelphia's neighborhoods. To support its redevelopment activities, PHA continues to implement the following MTW components. These components support the Partnership Initiative and other MTW activities:

- **Design Standards** – PHA continues to implement reasonable and modest design standards for new construction and rehabilitation work that mirror current design trends and the 21st century needs of residents. Modified design standards take into account efficiencies in energy usage, construction methods and technologies, and use of interior and exterior space. PHA standards also incorporate modern amenities and the latest concepts in urban design in order to reduce the negative connotation of public housing for PHA residents and to enhance the livability and marketability of PHA's housing stock. This activity, approved and implemented in FY 2004, is ongoing.
- **Total Development Cost Limits and Housing Cost Caps** – PHA has established and maintains reasonable cost limits for development and redevelopment activities that replace HUD's Total Development Cost (TDC) limits and Housing Cost Caps (HCC). PHA's MTW TDC/HCC cost limits reflect all the costs associated with developing new PHA conventional and scattered sites and rehabilitating existing units in these categories. PHA cost limits address current construction practice costs while incorporating energy efficient and environmentally sound equipment and materials used in the building process. They support the development of accessibility features in units and throughout the development. In addition, the establishment of new cost limits takes into account the market trends in construction and union labor rates, Davis Bacon rates, and costs associated with government contract work versus private market contract work. The cost limits incorporate the cost of modern design amenities to improve PHA's marketability. PHA last updated and obtained HUD approval for the MTW TDC/HCC cost limits in 2009, which are included in Appendix G. Based on recent discussions with HUD, PHA commissioned an independent engineering study of local development costs in order to establish updated MTW cost limits. PHA has received a preliminary report from the engineering firm which is currently under review. Upon completion of the engineering study, PHA will seek HUD approval of updated MTW TDC/HCC cost limits. PHA anticipates that the engineering study will be completed in July 2017. Follow up with HUD will occur upon completion of the study. This activity was approved and implemented in FY 2004.
- **Streamlined Mixed-Finance Development Process** – PHA is authorized to develop public housing through several financing methods, including the mixed-finance approach, which involves the use of private financing, Housing Choice Vouchers, and public housing development funds. According to public housing regulations, PHA and its partners may select among several ownership structures for mixed-finance transactions. These structures may include total private ownership, where PHA does not hold an

ownership interest; total ownership by PHA; or a mixture of partial ownership by PHA and its partners. The various arrangements may necessitate different documents, especially for those transactions with third party-developers/owners for which PHA will provide capital or ACC subsidy only. These mixed finance developments may consist of all public housing units or a mixture of public housing and market rate or non-public housing rental and homeownership units. Note that the timing of demolition and/or dispositions related to RAD conversions is established in consultation with HUD for each RAD transaction. Where the RAD conversion relates to an existing development, disposition occurs as part of the closing transaction. Where the RAD conversion relates to transfer of assistance, the disposition timetable is generally established as within one year of the closing transaction. This activity was approved and implemented in FY 2004 and is ongoing.

- **MTW Site and Neighborhood Standards** – PHA is authorized to implement alternate Site and Neighborhood Standards for its public housing and voucher programs, in lieu of those standards at 24 CFR § 941.202(b)-(d) and 24 CFR 983.57. PHA continues to use these standards for determining the location of existing, newly constructed, or substantially rehabilitated housing that receives MTW subsidy. This activity was approved and implemented in FY 2004 and is ongoing.
- **Streamlined Acquisition Process** – Subject to the provisions of the MTW Agreement, PHA is authorized to acquire sites without prior HUD approval, provided that the agency certifies that HUD site selection requirements have been met. Accordingly, PHA has established a public housing acquisition process as part of its streamlined mixed-finance process agreed to by HUD. This activity was approved and implemented in FY 2002. PHA recognizes that the foregoing authorization does not exempt the housing authority from environmental approvals or other approvals required outside of the U.S. Housing Act of 1937, as amended. PHA also acknowledges that it needs to identify any planned acquisitions in the MTW Annual Plan and to report on actual acquisitions in the MTW Annual Report.
- **Strategy for Development:** PHA has adopted a Development-Asset Management Strategy for Public Housing that takes a comprehensive neighborhood-by-neighborhood and block-by-block approach to redeveloping, consolidating, rehabilitating, demolishing, and acquiring and disposing of scattered site units independently and in partnership with government and other local neighborhood-based organizations. This activity was approved and implemented in FY 2005 and it is ongoing. As appropriate, PHA's new Development Principles will be used to guide all future development efforts.

No new units are proposed under this activity in FY 2018.

Proposed Changes to Activity: No changes are proposed.

Changes to Baseline, Benchmarks, Metrics: There are no changes to baselines. Benchmarks have been updated to reflect planned activities and volumes in FY 2018. PHA will report on outcomes in the MTW Annual Report.

Metrics:

CE #1: Agency Cost Savings*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	TBD	\$0		

* HUD is requiring the use of this metric; however, PHA does not believe it is applicable in this context of this MTW activity. PHA will attempt to identify the current baseline as part of the FY 16 Annual Report and then establish a benchmark of maintaining this level going forward, i.e. PHA would not anticipate an increase in Agency Cost Savings.

CE #2: Staff Time Savings*

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

* HUD is requiring the use of this metric; however, PHA does not believe it is applicable in this context of this MTW activity. PHA will attempt to identify the current baseline as part of the FY 16 Annual Report and then establish a benchmark of maintaining this level going forward, i.e. PHA would not anticipate an increase in staff time savings.

CE #3: Decrease in Error Rate Task Execution*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	0	0		

* HUD is requiring the use of this metric; however, PHA does not believe it is applicable in this context of this MTW activity.

CE #4: Increase in Resources Leveraged

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	\$0	\$0		

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	0 in FY 2018		

HC #2: Units of Housing Preserved

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0	0		

HC #3: Decrease in Wait List Time*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	Public housing – 14 years for participants housed in FY 15 *	TBD		

* PHA establishes new SBWLs for each new development. The baseline used is the agency wide average wait time for Public Housing. PHA does not know how many applicants will apply for these developments; therefore, is unable to establish a benchmark for this development at this time.

HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	0 units in FY 2018		

MTW 2004-2: Service-Enriched Housing for Seniors and People with Disabilities

Description/Update: PHA is collaborating with the Commonwealth of Pennsylvania and other local providers to develop and implement a range of service-enriched housing options for seniors and people with disabilities, including the following ongoing and planned program components:

- **Adult Day Care** – Adult Day Care provides non-medical supportive day services to eligible elderly persons. Adult Day Care includes assistance with activities of daily living, medication reminders, social activities, meals and snacks, and educational programs. An affiliate – Elderly and Disabled Services, LLC - administers the Adult Day Care program services. The first Adult Day Services facility is located at the Nellie Reynolds Gardens senior housing development. Both PHA residents and neighborhood residents are eligible to participate in the program. This activity was first approved and implemented in FY 2011. The facility opened in 2010.
- **The Nursing Home Transition Initiative (NHTI)** is a partnership with DPW that assists persons transitioning out of nursing homes to access affordable housing. As part of NHTI, PHA administers state-supported vouchers/housing opportunities for referrals of disabled consumers in need of low-income housing. NHTI families may be eligible for a preference for public housing or HCV. PHA utilizes its MTW flexibility to increase HCV payment standards up to 120% of the HUD Fair Market Rents in order to secure housing, subject to rent reasonableness. Applicants for NHTI units are referred to PHA from applicable partnering agencies. This activity was first approved and implemented in FY 2010 and is ongoing.
- **Definition of Elderly** – An elderly person is defined as an individual who is at least 55 years old. An elderly family is defined as one with a head of household, co-head, spouse or sole member who is at least 55 years old. For the purposes of admission to public housing designated as elderly-only, the definition of *elderly* and *elderly family* for each designated project will be specified in PHA's Designated Housing Plan in effect and may differ from the foregoing definition. This activity was first approved and implemented in FY 2004 and is ongoing.

Proposed Changes to Activity: No changes are proposed to this activity; however, PHA notes that it is currently evaluating alternative approaches to the operation of the adult day care center, including third party operation of the center.

Changes to Baseline, Benchmarks, Metrics: There are no changes to baselines. Benchmarks have been updated to reflect planned activities and volumes in FY 2018. PHA will report on outcomes in the MTW Annual Report.

Metrics:

HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move	0 – Adult Day Care	66 - ADC		

to a better unit and/or neighborhood of opportunity as a result of the activity (increase). (ADC) 75 ongoing (NHT)
 0 – Nursing Home Transition (NHT)

HC #7: Households Assisted by Services that Increase Housing Choice (Adult Day Care and Nursing Home Transition)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0 – ADC	66 - ADC		
	0 – NHT		75 ongoing (NHT)	

MTW Activity 2004-3: Simplification and Streamlining of Rent and Recertification Processes for Public Housing and HCV

Description/Update: PHA has implemented a series of initiatives in the public housing and/or HCV programs designed to simplify rent calculation and the recertification, streamline administrative processes, and reduce paperwork burdens on residents and staff. For all of PHA's rent and utility allowance policies implemented pursuant to its MTW authority, PHA will consider exceptions to these policies on a case-by-case basis for families who can demonstrate a long term hardship that will result from application of the policies to them, or as a reasonable accommodation. To qualify for a hardship exemption, a household must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the application of the rent or utility allowance policy to the household will affect the household.

The following is a summary of ongoing and planned program components:

- **Two and Three-Year Recertification** – PHA has restructured the annual and interim review processes and procedures for public housing and HCV to require recertifications every two years; however, certain households will be recertified on a triennial basis such as households on ceiling rent. PHA has modified the policies on interim recertifications including a restriction on voluntary interim recertifications. Voluntary interim recertifications are restricted to one voluntary interim recertification every six months, except for elderly/disabled households who are exempt from this restriction. Interim recertifications requested by the household due to increases in earned income for families in the FSS program will not be counted toward the limit on voluntary interim recertifications. PHA will complete EIV checks every six months for households with zero, temporary or sporadic income. This activity was approved and implemented in FY 2004 and is ongoing.
- **Ceiling Rents** – PHA has established ceiling rents for its public housing developments. Ceiling rents for sites managed by PAPMC are set at the Pennsylvania Housing Finance Agency ceiling rent limits in effect for LIHTC properties. PHA implemented PHFA 40% ceiling rents at conventional and scattered sites effective as of July 1, 2013. Ceiling rents will be updated periodically to reflect the then-current 40% PHFA ceiling rents, however if the PHFA 40% ceiling rent decreases, PHA will not decrease its ceiling rent. At PHA developments where tenants pay for some or all utilities, the applicable utility allowance may be applied to the ceiling rent, i.e. the ceiling rent amount may be offset by the applicable tenant-paid utility allowance amount. PHA will apply the ceiling rent amount when it is less than the income-based rent calculation. PHA may elect to phase-in rent increases to avoid serious financial hardship to residents if necessary. This activity was approved and implemented in FY 2004 and is ongoing. Ceiling renters will have full reexaminations on a triennial basis.

At the ceiling rent update, PHA will compare the family's income based rent from their last full recertification to the new ceiling rent. If the updated ceiling rent is below the income based rent, PHA will automatically apply the new ceiling rent. PHA will notify the family of the new ceiling rent and will provide the tenant with the option to switch to

income based rent if the income based rent is lower than the new ceiling rent. If the family opts to switch to an income based rent, a full recertification will be completed and the family will switch to a biennial recertification frequency

- On the years between the full reexaminations, PHA will conduct ceiling rent updates. If the family opts to switch to an income based rent, a full reexamination will be completed and the family will switch to a biennial reexamination frequency.

PHA may elect to phase-in rent increases to avoid serious financial hardship to tenants if necessary.

- **Rent Calculation Method** – PHA has established an alternative rent structure for the HCV and public housing programs to motivate residents to work and accumulate savings. Note that residents living in LIHTC units are not subject to this rent calculation policy. Public housing residents may elect a ceiling rent in lieu of the income-based calculation method.

PHA's rent simplification system includes the following components:

- Establishing a single working household deduction;
- Establishing an asset income exclusion;
- Establishing an exclusion of full-time student earned income;
- Modifying the definition of medical related expenses to include only certain medical-related insurance premiums;
- Eliminating all other deductions;
- Reducing the standard rent calculation percentage based on family size; and
- Applying a minimum rent of \$50.

In FY 2017, as part of PHA's revised rent calculation initiative, PHA modified the asset self-certification policy by allowing households with up to \$50,000 in assets to self-certify asset value and income from the assets. Additionally, PHA modified the asset income exclusion from excluding the first \$500 of asset income to excluding income from assets when the value of the household's assets is up to \$50,000. PHA also modified the method for calculating asset income by using market value of asset times the passbook savings rate to calculate income from assets for households with greater than \$50,000 of assets. PHA may also modify the working family deduction to provide greater incentives to families who experience increases in earned income.

In FY 2017, as part of PHA's restructuring of the regular and interim recertification process, PHA began conducting recertifications every three years for elderly or disabled households on fixed incomes in both the HCV and public housing program. Finally, within the limit on interim recertifications, PHA processes voluntary interim rent reductions if and when the reduction in income lasts for more than 30 days. Elderly and disabled are exempt from the limit on interim recertifications.

In FY 2017 PHA began excluding all full-time student earned income for family members other than the Head, Spouse or Co-Head. PHA discontinued verification of

full-time student income as 100% of the income is excluded. These modifications are consistent with the MTW statutory goal of reducing cost and achieving greater cost effectiveness by decreasing the frequency of recertifications for elderly/disabled households on fixed incomes, increasing the threshold of time to qualify for an interim rent reduction and eliminating the need to verify full-time student income when 100% of the income is excluded.

This activity was approved and implemented in FY 2004 and was modified in FY 2017 and is ongoing.

- **Payment Standards** – PHA has implemented a policy in the HCV program whereby the current payment standard is applied at regular recertification regardless of fluctuations in the Fair Market Rents from year to year. The payment standard that applies to a household at initial lease up is the payment standard in effect when the lease is approved and executed by the tenant and owner. This activity was implemented in FY 2008 and is ongoing. PHA may modify payment standard thresholds to support leasing for existing households. This policy will supersede any related provisions of HOTMA.

Beginning in FY 2017, in concert with existing payment standard modifications PHA began approving payment standards up to 120% of the FMR to support leasing for existing voucher clients and/or new voucher holders who wish to move to areas with empirically-documented improved educational systems, job opportunities, social services and other opportunities in the expectation that over time their need for housing and other subsidies will abate or diminish. This modification is consistent with the MTW statutory goal of increasing housing choice for low-income families by making it possible for voucher households to move to neighborhoods of opportunity.

Reasonable Rent – PHA has developed and implemented a reasonable rent policy for the HCV program whereby reasonable rent determinations are completed at initial lease up, upon request for a rent increase, and at other times PHA deems it necessary to conduct a reasonable rent re-determination. PHA is clarifying that in addition to this policy applying to the tenant-based voucher program, PHA is also applying this policy to the unit-based program, including PHA owned units. This activity was approved and implemented in FY 2008 and is ongoing.

PHA may implement across-the-board rent increases or rent freezes for properties in the HCV program. When and if an across-the-board rent increase is awarded, PHA will complete a reasonable rent determination at the time of the next annual HQS inspection and apply applicable policies related to reasonable rent when and if the rent is not reasonable. This policy was approved and implemented in FY 2005.

- **Utility Allowances** – PHA is authorized to implement a revised utility allowance methodology that includes the following components: a) HCV participants who are responsible for paying gas heat and who are eligible to participate in the PGW Customer Responsibility Program (CRP) will have the gas portion of their utility allowances calculated using an alternative methodology. Participation in the PGW CRP program

places a cap on the amount of money that eligible residents will be required to pay for their gas utility payments based on household income, not consumption. Utility allowance schedules are typically determined based on an analysis of the cost of reasonable consumption based on dwelling unit size/type. PHA will utilize the PGW CRP capped amount to calculate the gas allowance due to residents, except in those limited circumstances where the CRP amount exceeds PHA's gas utility allowance schedule. The alternative utility allowance amounts will be factored into the rent calculation, including the Total Tenant Payment calculation. With this change, residents will continue to have their Total Tenant Payment limited to no more than 28% of household income. PHA has received approval to implement this initiative in the public housing program; and is planning on implementing PGW's CRP for public housing residents in FY 2018 subject to court approval as needed; b) PHA will periodically, at its discretion, review HCV utility allowance schedules to determine if adjustments are required. Annual updates will not be required. This activity was first approved in FY 2014; c) Utility allowances may be phased out for residents with incomes at or above 80% of Area Median Income or PH residents on ceiling rent; and d) PHA will review and modify public housing utility schedules periodically based on an assessment of available HUD funding and the requirements of the MTW Agreement and Plan. PHA may apply the HUD-determined operating subsidy pro-ration factor to determine the actual utility schedule amounts. Revised utility allowances will be applied to a family's rent calculations at the next scheduled recertification after the allowance is adopted or at one time across all affected households. The approach taken will be at the discretion of PHA; PHA will report on utility schedule updates in the MTW Annual Report. This activity was approved and implemented in FY 2009.

PHA is also authorized to expand the utility allowance policy to require public housing and HCV tenants receiving either heat or electric utility allowances to enroll and participate in the PECO Customer Assistance Plan, LIHEAP and any other applicable programs that offer reduced rates, energy usage grants, or other financial incentives to low-income households. This activity was approved in FY 2011. PHA may look to implement this portion of the utility allowance activity in FY 2018.

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

In FY 2017 PHA determined not to implement the minimum threshold of \$20 for provision of utility allowance payments.

PHA is clarifying that it applies certain TBV program rent simplification activities to the UBV and RAD program, including the policies on verification and calculation of assets, biennial and triennial recertifications, the limit on interim recertifications, and elimination of the Earned Income Disregard policy.

PHA periodically reviews and reevaluates the impact of its rent reform initiatives. Current MTW rent policies do not have an adverse impact on affordability as rent for residents of both public housing and HCV (MTW vouchers) is less than or equal to 28% of adjusted household income. As part of this Plan, PHA completed an impact analysis to confirm that participants continue to pay no more than 28% of their income toward rent. This would be the case for all HCV households who leased units at or below the payment standard and for all Public Housing households, except for those with zero incomes. Where participants are enrolled in the CRP program, the cap on utility costs represents an impactful participant savings as the cap on gas heating costs is based upon a percentage of income and not upon utility consumption. See Appendix H for the results of the impact analysis. PHA will make changes to the rent simplification approach or specific elements of the rent calculation system, and revise policies and procedures as required ensuring that the goals of administrative efficiency and overall fairness are maintained.

Proposed Changes to Activity: Under HUD’s proposed rule regarding implementation of Small Area Fair Market Rents (SAFMRs), Philadelphia is one of the metropolitan areas likely to be selected to transition from a metropolitan area-wide approach to setting FMRs at the zip code level as a means to expand the options PHA families have to live in higher opportunity neighborhoods. While PHA supports the concept of higher payment standards for higher opportunity areas, it is essential that a transition to a new payment standard model minimize any hardship for current HCV program participants. As the SAFMR methodology does not include new funding, PHA is also concerned that funding may not be sufficient to support the current number of households served in the HCV program. PHA will monitor the progress of this proposed rule and determine, upon issuance of the final rule, if alternative MTW policies are necessary.

Currently, PHA applies MTW rent simplification policies on biennial and triennial recertifications, the limit on interim recertification and asset verification and calculation to the unit based program. In FY 2018, PHA will look to apply the remaining portions of rent simplification to the unit based program. Where program requirements prohibit application of MTW rent simplification policies to unit based contracts, PHA will apply income and rent calculation requirements consistent with applicable program requirements, i.e. tax credit units.

Changes to Baseline, Benchmarks, Metrics: The baseline for the UA savings was changed to reflect savings generated as a result of implementation of the MTW UA CRP policy. Benchmarks have been updated to reflect planned activities and volumes in FY 2018. PHA will report on outcomes in the MTW Annual Report.

Metrics:

CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Time per recertification: 2 hours	Time per recertification: 1.5 hours		
	Number of recertifications: 28,055	Number of		

Average earned income of households affected by this policy in dollars (increase).

The average earned income of households affected by this policy in FY 15 is \$20,749.

The expected average earned income of households affected by this policy after implementation of the activity is \$20,602*

* Although this activity was implemented in FY 04, HUD has only recently required PHA to track the average earned income of households affected by this policy; therefore PHA has used data from FY 15 to determine the baseline. As this activity has been implemented and on-going for over 10 years, PHA expects the average earned income of households to remain stable. For additional information, see HUD's Frequently Asked Questions About HUD Form 50900 dated September 13, 2013.

SS #3: Increase in Positive Outcomes in Employment Status*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed (increase)	4,725 (36%) of heads of households had earned income as of March 31, 2014.	6,752 (43%) of work-able heads of household have earned income 4,215 out of 9,224 HCV 2,537 PH out of 6,149		

* The benchmark is contingent on the economy and opportunities available in the City of Philadelphia.

SS #3: Increase in Positive Outcomes in Employment Status*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unemployed (decrease)	8,282 (64%) work-able heads of households had no earned income as of March 31, 2014.*	Decrease the total number of work-able heads of households not earning income as of the end of FY 18 to 8621 (56%). HCV: 5009 out of 9224 PH: 3612 out of 6,149		

* Although this activity was implemented in FY 04, HUD has only recently required PHA to track the employment status of work-able heads of households affected by this policy; therefore PHA has used data from FY 14 to determine the baseline. As this activity has been implemented and on-going for over 10 years, PHA expects the employment status of work-able heads of household to remain stable. For additional information, see HUD's Frequently Asked Questions About HUD Form 50900 dated September 13, 2013.

SS #8: Households Transitioned to Self Sufficiency*

Unit of Measurement	Unit of Measurement	Unit of Measurement	Unit of Measurement	Unit of Measurement
Number of households transitioned to self-sufficiency (increase).	0 households	203 (HCV 180) (PH 23) households are expected to transition to self-sufficiency in FY 18.		

*For HCV, PHA defines a household that transitions to self-sufficiency as an HCV participant who exits the program as a result of being over-income or one that receives no HAP subsidy but still qualifies as program participants. For public housing, PHA defines a household that transitions to self-sufficiency as a public housing household whose income increased from a lower level to 80% or greater of Area Median Income.

NOTE: PHA believes that the above metrics do not accurately reflect the success of this activity as they do not account for

unit/population turnover (i.e. households moving out and in over multiple years). The baselines set above reflect a snapshot in time and do not account for families leaving and being replaced by lower-income families resulting in the make-up of the populations being increasingly different over time.

MTW Activity 2004-4: Unit-Based Leasing and Development Program

Description/Update: Expanding the supply of affordable housing in Philadelphia continues to be a major objective of the PHA MTW Demonstration program. Under PHA's Unit-Based Leasing and Development Program ("UBV" or the "Unit-Based Program"), PHA negotiates contracts with for-profit and non-profit private sector housing providers for unit-basing PHA's local rent subsidy using MTW block grant funds (Operating, Capital, HCV) based on property specific agreements. To date, PHA has selected Unit-Based Program for MTW HCV Funds participants through a competitive procurement process. This MTW initiative was approved and implemented in FY 2004.

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

The rent to the owners participating in the UBV program funded with MTW HCV funds will not exceed the lowest of 110% of the applicable fair market rent, the reasonable rent, the rent requested by the owner or such other amount determined by PHA to be appropriate for the unit based upon the nature of the unit and the RFP from which the owner was selected. For example, in certain cases, PHA believes a shallower subsidy is more appropriate.

Unless part of its "shallow" subsidy UBV program, PHA will not attach or pay UBV assistance to units that are already receiving another form of subsidized housing operating assistance. With respect to a shallow subsidy UBV program, PHA will not attach or pay UBV assistance to units receiving another form of subsidized operating assistance if the UBV assistance would be duplicative or would otherwise over-subsidize the unit. PHA may determine the effect of subsidy on rent to owners and the duplication of subsidy or excessive subsidy, subject to the requirements regarding subsidy layering as set forth in the HUD Reform Act of 1989. PHA may unit-base up to 100 percent of the dwelling units in any UBV project or building.

PHA may select its own units for project-basing with UBV assistance without a competitive process. Pursuant to Attachment C, Section D (7)(a), PHA may unit-base assistance at properties other than public housing properties owned directly or indirectly by PHA, including those owned by PHA affiliates or instrumentalities. For purposes of this selection method, a property that may be unit-based may be a former public housing property that has been converted to HCV assistance. Pursuant to Attachment C, Section D (1)(f), under either the UBV program or the Partnership Initiatives, PHA may attach or pay UBV assistance using HCV MTW funds to unit types currently prohibited by standard Section 8 regulations including, but not limited, to shared living facilities. Such units must comply with applicable alternate MTW Site and Neighborhood Standards. In February 2017, with the support of the local Veterans Administration, PHA requested HUD approval to enter into a HAP contract under the HUD VASH-PBV program for an existing, 14-unit shared housing facility (Hancock Manor) operated by Impact Services. HUD accepted PHA's use of the existing MTW waiver related to shared living facilities in project-based developments for this VASH project. Subject to HUD approval and the support of the VA, PHA may apply MTW waivers related to shared housing facilities in project-based developments to future VASH projects.

An owner of a unit assisted under the UBV program for MTW HCV funds may elect to receive referrals from PHA's waiting list or to maintain a site-based waiting list for selection of tenants for a site. For owners using a site-based waiting list, owners must refer families to PHA for eligibility screening and must comply with applicable PHA policies regarding management of the waiting list. Owners must submit and PHA must approve the owners tenant selection plan.

Pursuant to PHA's MTW authority, PHA does not provide UBV participant families who want to move with tenant- based assistance with a tenant-based voucher. Once a family terminates the lease, the family will no longer be part of the HCV or UBV program. Under certain conditions, as outlined in the Administrative Plan, PHA may provide a tenant-based voucher to a UBV participant family.

For mixed-finance closings for UBV units involving new public housing units, PHA may request HUD review and approval of certain waivers to current public housing regulations in the interest of increasing housing choice, promoting long-term project viability, and encouraging more third party development. Specific waivers that may be requested include:

- PHA may elect to allow the owner of UBV units, including PHA if it is the owner, to utilize public housing operating subsidy and other MTW funds, to pay for debt service associated with the UBV development; and
- Where PHA provides public housing operating subsidy as part of UBV assistance, separately or in combination with voucher or other MTW funds, PHA may have the Declaration of Restrictive Covenants modified to eliminate or change the standard ten-year affordability "tail,"

While the above waivers do not require MTW authority, they are directly relevant to the Unit Based Leasing and Development and Partnership Initiative activities. PHA is providing this information in the MTW Annual Plan to clarify its intention to seek future HUD waivers. The specific details of each UBV agreement will be defined prior to closing and shall be subject to HUD review and approval, where applicable, as part of the mixed-finance transaction closing process.

In FY 2017 HUD approved changes to PHA Unit Based Program including PHA's application of its MTW UBV policy to RAD developments and PHA's ability to project-base 100% of the units in a RAD UBV development. Also in FY 2017, HUD approved PHA's MTW policy to waive the requirement for an independent entity to approve AHAP/HAP contract terms, renewals of HAP contracts, rent determinations and inspection of PHA owned units. Requiring approval from an independent entity is expensive and time consuming for PHA when PHA performs the same functions independently for units and households in their public housing program. This modification is consistent with the MTW statutory goal of reducing cost and achieving greater cost effectiveness by streamlining the management of UBV and RAD UBV projects.

To support the initiatives included in this activity, PHA will prepare local forms which reflect PHA's MTW policies and procedures. For example, PHA will prepare a local PB HAP contract

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

In FY 2018, PHA may issue requests for proposals, conduct evaluations and recommend additional units and developments for approval by the PHA Board. Additionally, in FY 2018 PHA will continue to unit base developments which have been approved for conversion under RAD.

The following table provides information on projects that are currently subsidized or scheduled to be under contract through the end of FY 2017. Additional projects that are projected to be under contract in FY 2018 – including RAD conversion and transfer of assistance projects - are included in Table 4 above. PHA is in the process of determining whether renewals will be issued for some of the developments on the table below.

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
Edison 64	Veteran's Multi-Service Center	Low Rise Old Converted High School	North Philadelphia	20	Homeless veterans	Yes
Hancock Manor	Impact Services	Low Rise	North Philadelphia	14	Homeless veterans	Yes
46 th St	Columbus Property Management	Low rise apartments and row homes	West Philadelphia	4	mental health/chemical dependency	yes
4th & Diamond	Women's Community Revitalization Project	Row homes	North Philadelphia	32	families/very low income	yes
5317 S 15 th St	Columbus Property Management	Low rise apartments and row homes	North Philadelphia	1	mental health/chemical dependency	yes
7 th and Ritner	Columbus Property Management	Low rise apartments and row homes	South Philadelphia	5	mental health/chemical dependency	yes
810 Arch Street	Project Home	High rise apartments	Center City	70	Homeless, homeless youth, elderly couples	yes
Academy Rd	Columbus Property Management	Low rise apartments and row homes	Northeast Philadelphia	18	mental health/chemical dependency	yes
Anna's House	Citizens Acting Together Can Help, Inc.	Low rise apartments	South Philadelphia	12	Homeless/mental health	yes
Arch V Temple	Columbus Property Management	Low rise apartments	North Philadelphia	49	families/very low income	no
Arch VI Temple	Columbus Property Management	Low rise apartments	North Philadelphia	40	families/very low income	no
Arch VII/LIH Walnut	Columbus Property Management	Low rise apartments and row homes	West Philadelphia	14	mental health/chemical dependency	Yes
Art Apartments	Pine Lake	Low rise	West	30	families/very	No

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
	Management Associates LP	apartments	Philadelphia		low income	
Ascension Manor	Michaels Organization	Low rise apartments	North Philadelphia	3	disabled	yes
Belmont I	Inglis House	Low Rise apartments	West Philadelphia	25	seniors and disabled	yes
Belmont II	Inglis House	Low Rise apartments	West Philadelphia	15	seniors and disabled	yes
Benner/Frankford	Columbus Property Management	Low rise apartments and row homes	Northeast Philadelphia	8	mental health/chemical dependency	yes
Bernice Elza	Peoples Emergency Center	Low rise apartments	West Philadelphia	6	emancipated teens/homeless	yes
Bethesda Project Bainbridge	Bethesda Project Inc.	Low rise apartments	South Philadelphia	20	homeless	yes
Bethesda Project South	Bethesda Project Inc.	Low rise apartments	Center City Philadelphia	4	homeless	yes
Bethesda Project Spruce	Bethesda Project Inc.	Low rise apartments	Center City Philadelphia	13	homeless	yes
Bigham Place	Peoples Emergency Center	Low rise apartments	West Philadelphia	7	Homeless families	Yes
Blakiston St	Columbus Property Management	Low rise apartments and row homes	Northeast Philadelphia	7	mental health/chemical dependency	yes
Borinquen	Borinquen Associates II Limited	Scattered row homes	North Philadelphia	17	families/very low income	no
Brentwood Parkside	Columbus Property Management	High rise apartments	West Philadelphia	22	seniors/families/very low income	no
Chatham Court Apartments	Chatham Apts. Assoc. LP	Low rise apartments	West Philadelphia	18	families/very low income	no
Chestnut St	Columbus Property Management	Low rise apartments and row homes	University City	6	mental health/chemical dependency	yes
Cloisters	Cloisters III Housing Partnership	Low rise apartments/duplexes and row homes	West Philadelphia	18	homeless	yes
Conklin St	Columbus Property Management	Low rise apartments and row homes	Northeast Philadelphia	3	mental health/chemical dependency	yes
Courtyard at Riverview (RAD Conversion)	Michaels Org	High Rise Apartments/Row homes	South Philadelphia	470	Seniors/low income families	no
Dignity 1	Community For Dignity & Fairness	Scattered row homes	Germantown/Mt. Airy	10	women with children (domestic abuse)	yes
Dignity 15	Community For Dignity & Fairness	Scattered row homes	Germantown/Mt. Airy	4	women with children (domestic abuse)	yes

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
Dignity 21	Community For Dignity & Fairness	Scattered row homes	Germantown	11	women with children (domestic abuse)	yes
Dignity 33	Community For Dignity & Fairness	Scattered row homes	Mt. Airy	16	women with children (domestic abuse)	yes
Dignity 4	Community For Dignity & Fairness	Scattered row homes	Logan (Northwest Philadelphia)	3	women with children (domestic abuse)	yes
Dignity Boss	Community For Dignity & Fairness	Scattered row homes	Germantown/ Mt. Airy	8	women with children (domestic abuse)	yes
Dignity Nedro	Community For Dignity & Fairness	Low rise apartments	Logan (Northwest Philadelphia)	4	women with children (domestic abuse)	Yes
Ditman St	Columbus Property Management	Low rise apartments and row homes	Northeast Philadelphia	10	mental health/ chemical dependency	yes
Dunlap School Venture	Dunlap Management Partners LP	Low rise apartments	West Philadelphia	35	seniors	no
Edgewood Manor	Edgewood Manor Associates II Lap	Low rise apartments	North Philadelphia	33	families/very low income	no
Elders Place I	Penn Housing LLC	High rise apartments	Germantown	43	seniors	no
Elders Place II	Penn Housing LLC	Low rise apartments	Germantown	38	seniors	no
Fattah Homes I	PEOPLES EMERGENCY CENTER	Scattered Row homes	West Philadelphia	6	Homeless families	yes
Fattah Homes II	PEOPLES EMERGENCY CENTER	Scattered Row homes	West Philadelphia	6	Homeless families	yes
Fourth St Access	Columbus Property Management	Row homes and triplexes	North Philadelphia	24	families/very low income	No
Freedom Village	Freedom Village LP	Low rise apartments	North Philadelphia	16	families/very low income	No
Gaudenzia Shelton Court	Gaudenzia Foundation Inc.	Triplex and low rise apartments	North Philadelphia	19	young women (chemical dependency)	yes
Gordon Street	Philadelphia Housing Authority	Row homes	North Philadelphia	21	families/very low income	no
Grace Townhomes	Women's Community Revitalization Project	Row homes	North Philadelphia	36	families/very low income	yes
Hamill Mills	Lena St Associates	Low rise	Germantown	40	seniors	no

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
		apartments				
HELP I	HELP USA	Row homes	West Philadelphia	14	Veterans	yes
HELP IV Grover's Lane	HELP USA	Low rise apartments	West Philadelphia	15	veterans	yes
HELP Philadelphia II	HELP USA	Low rise apartments	West Philadelphia	50	transitional housing for women	yes
Hope Bridge (Vine St)	Methodist Family Services of Philadelphia	Low rise apartments	West Philadelphia	20	Homeless	yes
Hope Bridge (Ogden)	Methodist Family Services of Philadelphia	Low rise apartments	West Philadelphia	4	homeless	Yes
Imani I	Peoples Emergency Center	Row homes	West Philadelphia	24	Homeless families	no
Imani II	Peoples Emergency Center	Row homes	West Philadelphia	6	Homeless families	no
Imani III	Peoples Emergency Center	Row homes	West Philadelphia	6	Homeless families	no
Imani IV	Peoples Emergency Center	Row homes	West Philadelphia	8	Homeless families	no
Imani V	Peoples Emergency Center	Row homes	West Philadelphia	11	Homeless families	yes
Impact Veteran's Family Center	Impact Services	Low rise apartments	North Philadelphia	8	Veteran Families	yes
INB Mascher	Women's Community Revitalization Project	Row homes	North Philadelphia	12	families/very low income	yes
Inglis Apartments at Elmwood	Inglis House	Low Rise apartments and row homes	West Philadelphia	40	seniors and disabled	yes
Inglis Housing (Morris-Klein Apts)	Inglis House	High rise apartments	West Philadelphia	17	seniors and disabled	yes
Jackson St.	Columbus Property Management	Low rise apartments and row homes	Germantown	2	mental health/chemical dependency	yes
Jannie's Place I	Peoples Emergency Center	low rise apartments	West Philadelphia	6	Homeless families	Yes
Jannie's Place II	Peoples Emergency Center	low rise apartments	West Philadelphia	11	Homeless families	Yes
JBH Homes	Project Home	Low rise apartments	Fairmount	15	alcohol dependency	yes
Kate's Place	Project Home	High rise apartments	Center City Philadelphia	5	homeless/chemical dependency	yes
Kate's Place	Project Home	High rise apartments	Center City Philadelphia	30	homeless/chemical dependency	Yes

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
Kendrick/Gillespie	Columbus Property Management	Low rise apartments and row homes	West Philadelphia	11	mental health/chemical dependency	yes
Keystone St	Columbus Property Management	Low rise apartments and row homes	Northeast Philadelphia	6	mental health/chemical dependency	yes
Larchwood	Columbus Property Management	Low rise apartments and row homes	West Philadelphia	4	mental health/chemical dependency	yes
Lehigh Park	St Christopher's Associates L P VIII	High rise apartments	North Philadelphia	25	families/self sufficiency	yes
Liberty at Disston	Liberty Resources	Low rise apartments	Northeast Philadelphia	5	disabled	yes
Liberty at Welsh	Liberty Resources	Low rise apartments	West Philadelphia	2	disabled	yes
Los Balcones	Norris Square Civic Association	Row homes	North Philadelphia	21	low income families	no
Martin St	Columbus Property Management	Low rise apartments and row homes	Roxborough	7	mental health/chemical dependency	yes
Monument Mews	Columbus Property Management	Low Rise apartments and row homes	West Philadelphia	60	families/very low income	no
Monument Rd	Methodist Family Services of Philadelphia	Low rise apartments	West Philadelphia	11	emancipated teens/homeless	yes
Morton St	Columbus Property Management	Low rise apartments and row homes	Germantown	2	mental health/chemical dependency	yes
Mt. Vernon	Mt. Vernon LP	Low rise apartments	West Philadelphia	15	families/very low income	no
New Courtland Apts at Cliveden	New Courtland	High rise apartments	Germantown	32	seniors	no
NPCH - Community Building	NPCH Associates	Duplex apartments	North Philadelphia	16	families/very low income	no
Oakdale Street Apartments	Philadelphia Housing Authority	Row homes	North Philadelphia	12	families/very low income	no
Osage Ave	Columbus Property Management	Low rise apartments and row homes	West Philadelphia	2	mental health/chemical dependency	yes
Parkside 10	Columbus Property Management	Scattered triplexes	West Philadelphia	41	families/very low income	no
Parkside 11	Columbus Property Management	Scattered triplexes	West Philadelphia	8	families/very low income	no
Paseo Verdes	Transit Village Affordable Housing LP	Row homes	North Philadelphia	19	families/very low income	no
Patriot House	Citizens Acting Together Can Help, Inc.	Low rise apartments	South Philadelphia	15	homeless	yes
Pennrose	Citizens Acting Together Can Help,	Low rise apartments	South Philadelphia	10	homeless	yes

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
	Inc.					
Powelton Heights	Columbus Property Management	Low rise apartments	West Philadelphia	30	seniors	no
Praveen Chestnut	Liberty Resources	Low rise apartments	West Philadelphia	2	disabled	Yes
Preston St	Columbus Property Management	Low rise apartments and row homes	West Philadelphia	7	mental health/chemical dependency	yes
Ray's Place	Project Home	Low rise apartments	North Philadelphia	17	mental health/veterans	yes
Reed St	Columbus Property Management	Low rise apartments and row homes	South Philadelphia	8	mental health/chemical dependency	yes
Regent Terrace	Regent Terrace Housing Partnership	Low rise apartments	West Philadelphia	80	families/very low income	no
Rhawn St	Columbus Property Management	Low rise apartments and row homes	Northeast Philadelphia	11	mental health/chemical dependency	yes
Sandy's/Catherine House	Citizens Acting Together Can Help, Inc.	Low rise apartments	South Philadelphia	3	homeless	yes
Sarah Allen Homes	Sarah Allen Community Homes L P	Low rise apartments	West Philadelphia	1	families/very low income	no
Sarah Allen IV	Sarah Allen Community Homes L P	Low rise apartments	West Philadelphia	2	families/very low income	no
Sarah Allen V	Sarah Allen Community Homes L P	Low rise apartments	West Philadelphia	3	families/very low income	no
Sartain School Apartments	Sartain Management Partners LP	Low rise apartments	North Philadelphia	35	seniors	no
Sedgley Apartments	MPB School Apartments LP	Low rise apartments	North Philadelphia	16	families/very low income	no
Sheff/Wingate	Columbus Property Management	Midrise apartments	Northeast Philadelphia	8	mental health/chemical dependency	yes
Sheila D Brown Women's Center	Columbus Property Management	Low rise apartments	South Philadelphia	9	women/behavioral disabilities	yes
SIL Program	Inter Community Action Inc.	Low Rise Apartments	Roxborough	13	Mental health/chemical dependency	yes
South 55th St	South 55th Street L.P.	Duplex apartments	West Philadelphia	18	families/very low income	no
South Phila Scattered	Columbus Property Management	Low rise apartments and row homes	South Philadelphia	19	mental health/chemical dependency	yes
Spring Garden	Peoples Emergency Center	Low rise apartments	West Philadelphia	9	Homeless families	yes
Spruce St	Columbus Property	Low rise	West	3	mental health/	yes

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
	Management	apartments and row homes	Philadelphia		chemical dependency	
Susquehanna Apartments	Susquehanna Apts LP	Low rise apartments	North Philadelphia	47	families/very low income	no
Thompson St	Columbus Property Management	Low rise apartments and row homes	West Philadelphia	15	mental health/chemical dependency	Yes
Tillmon Villanueva	Women's Community Revitalization Project	Row homes	North Philadelphia	38	families/very low income	yes
Tioga Gardens	Tioga Gardens Associates	Low rise apartments	North Philadelphia	17	families/very low income	no
Walnut Park Plaza	Walnut Park Associates	High rise apartments	West Philadelphia	3	Disabled seniors	no
Walnut Park Plaza	Walnut Park Associates LLC	High rise apartments	West Philadelphia	224	seniors	no
Walnut St	Columbus Property Management	Midrise apartments	West Philadelphia	15	mental health/chemical dependency	Yes
WCRP-Scattered	Women's Community Revitalization Project	Row homes	North Philadelphia	21	families/very low income	yes
TOTAL				2656		

Proposed Changes to Activity: There are no changes proposed for this activity

Changes to Baseline, Benchmarks, Metrics: There are no changes to baselines. Benchmarks have been updated to reflect planned activities and volumes in FY 2018. PHA will report on outcomes in the MTW Annual Report.

Metrics:

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
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Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).

0 units

591 units at the end of FY 2018*

**HUD requires this metric track only newly constructed and/or rehabilitated units that were put under HAP Contract during the Plan year.*

HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
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Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 households	2,656 households will be able to move to a better unit and/or neighborhood of opportunity by the end of FY 18
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HC #7: Households Assisted by Services that Increase Housing Choice

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0 households	1,000		

MTW Activity 2005-2: Streamline the Admissions and Transfer Process

Description/Update: PHA has established a number of MTW policies designed to streamline the admissions and transfer policies for both Public Housing and HCV Programs:

- **MTW Transfers** – PHA may authorize a limited number of split-family transfers from Public Housing to the Housing Choice Voucher Program and vice versa. These transfers are referred to as MTW transfers. PHA provides for up to 50 Housing Choice Vouchers and 50 PH units to be transferred back and forth between PH and the HCV program. No more than 100 moves are authorized per fiscal year. Eligibility is determined by PHA Senior Management on a case-by-case basis, based upon immediate need, disability needs and availability of vouchers or public housing units. Transfers are used to support witness protection activities, domestic violence prevention, and other needs. If a resident transfers from Public Housing to the Housing Choice Voucher program, that resident will be subject to HCV eligibility guidelines and vice versa. HCV tenants will be required to wait until the end of their current lease term to transfer to a PH unit, unless the landlord agrees to a mutual dissolution of the lease. This activity was approved and implemented in FY 2005 and is ongoing.
- **HCV Waiting List** – Once a family is leased under the HCV Program, the family may remain on the waiting lists for Tax Credit and Public Housing sites. Additionally, PHA may require that the family sign an agreement whereby the family acknowledges they will not be eligible for selection from the Tax Credit or Public Housing site waiting lists until the HCV initial lease term has been completed. In instances where a landlord and tenant provide a mutual dissolution of the lease, PHA may allow an eligible family to lease a Tax Credit or Public Housing unit prior to the end of the initial lease term. If the family’s name comes to the top of the Tax Credit or Public Housing site waiting lists prior to completion of the HCV initial lease term, the family may be skipped; however, they will retain their position on the waiting list. In cases where the family was skipped, the family would be selected from the Tax Credit or Public Housing site waiting list when they have completed their initial lease term and their name comes to the top of the Public Housing or Tax Credit waiting list. Additionally, the family will be subject to all applicable program screening and eligibility requirements. This initiative was approved as modified and implemented in FY 2012.

- Public Housing Waiting List** – Once a family is housed in public housing, the family will be removed from all other scattered site and conventional PH waiting lists. However, a family may remain on the HCV and/or Tax Credit Site waiting lists. Additionally, PHA may require that the family sign an agreement whereby the family acknowledges that their name will be removed from all other scattered site and conventional PH waiting lists and they will not be eligible for selection from the HCV and/or Tax Credit Site waiting lists until the initial lease term has been completed. If the family’s name comes to the top of the HCV and/or Tax Credit Site waiting lists prior to completion of the initial lease term, the family will be skipped; however, they will retain their position on the waiting list(s). The family will be selected from the HCV and/or Tax Credit Site waiting lists when they have completed their initial lease term and either a voucher or vacant unit is available. Additionally, the family will be subject to all applicable program screening and eligibility requirements. Applicants, as a reasonable accommodation, may request that their name remain on waiting lists once housed, and PHA, on a case-by case basis, will review these requests in order to accommodate the needs of a person with disabilities. This initiative was approved as modified and implemented in FY 2012.

Proposed Changes to Activity: No changes are proposed.

Changes to Baseline, Benchmarks, Metrics: There are no changes to baselines. Benchmarks have been updated to reflect planned activities and volumes in FY 2018. PHA will report on outcomes in the MTW Annual Report.

Metrics:

HC #3: Decrease in Wait List Time – MTW Transfers

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	Public Housing: 14 years in FY 15	Public Housing: 14 years in FY 18		
	HCV: 4.5 years in FY 2015	HCV: 7 years in FY 2018		

*HC #5: Increase in Resident Mobility- MTW Transfers**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	TBD*	60 (estimate based on recent history with MTW Transfer activity)		

**PHA has previously indicated that PHA does not believe this metric is applicable to this activity. However, HUD has required its use. PHA is not able to derive a baseline for these activities which were initially implemented in FY 2005 (i.e. almost 10 years before implementation of HUD standard metrics). PHA welcomes HUD’s guidance on a specific methodology for measurement. Once provided, PHA will incorporate such guidance on future plans and reports*

*CE #1: Agency Cost Savings – MTW Transfers **

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	TBD	TBD		

** PHA has previously indicated that PHA does not believe this metric is applicable to this activity. However, HUD has required its use. PHA is not able to derive a baseline for these activities which were initially implemented FY 2005 (i.e. almost 10 years before implementation of HUD standard metrics). PHA welcomes HUD's guidance on a specific methodology for measurement. Once provided, PHA will incorporate such guidance on future plans and reports.*

CE #2: Staff Time Savings – HCV and Public Housing Waiting Lists *

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	TBD	TBD		

** PHA has previously indicated that PHA does not believe this metric is applicable to this activity. However, HUD has required its use. PHA is not able to derive a baseline for these activities which were initially implemented FY 2005 (i.e. almost 10 years before implementation of HUD standard metrics). PHA welcomes HUD's guidance on a specific methodology for measurement. Once provided, PHA will incorporate such guidance on future plans and reports.*

MTW Activity 2005-3: HCV Program Efficiencies

Description/Update: PHA is implementing additional efficiencies in the HCV Program designed to simplify processing and streamline administrative processes. The following is a summary of ongoing program components:

- **Restriction on Elective Moves** – PHA policy regarding moves during the initial lease term and at the time of lease anniversary pertains to moves both within PHA’s jurisdictions and initial moves outside of PHA’s jurisdiction. Families are not permitted to move within PHA’s jurisdiction during the initial term of assisted occupancy. The CEO or designee may approve exceptions to this policy. Subsequent to the initial lease term, families are permitted to move only at the time of lease anniversary or under extenuating circumstances as defined in the Administrative Plan subject to PHA management approval. Examples of extenuating circumstances include approved and documented VAWA or reasonable accommodation move requests. PHA may deny permission to move if the family violates HCV Program obligations and/or owes PHA money. This activity was approved and implemented in FY 2008 and is ongoing.
- **Criteria for Portability Moves** – PHA has established criteria for all port out moves. The criteria requires that MTW voucher participants requesting to port out provide a verified employment, education, safety, or medical/disability need to support their move to another jurisdiction. Families who are unable to provide a verified “employment, education, safety, or medical/disability need” will not be permitted to port out. PHA has established verification requirements to validate the family’s employment, education, safety, or medical/disability need. If a voucher participant leases up within the City of Philadelphia, they are not permitted to port out during their initial lease term except for extenuating circumstances such as approved and documented VAWA or reasonable accommodation requests. Subsequent to their initial lease term, families may only move at the time of their lease anniversary. Families with vouchers administered under the VASH program are not subject to this policy. This MTW activity only applies to MTW voucher participants whose initial voucher was issued by PHA or those who have subsequently been absorbed by PHA. This activity was first approved in FY 2013.
- **Development of Local Forms** - To support the initiatives included in this activity, PHA will prepare local forms which reflect PHA’s MTW policies and procedures. Among the local forms developed and implemented are the Tenant Based HAP contract, Tenant Based Tenancy Addendum, Request for Tenancy Approval, Privacy Act Release Form which reflects a term of 24 months to coincide with PHA’s biennial recertification, and a model lease. These local forms reflect MTW policies including but not limited to, rent determination methods, recertification frequencies and right to move policies. In FY 2017, PHA discontinued the use of the MTW Family Agreement Addendum and incorporated all MTW requirements in recertification documents.

Proposed Changes to Activity: In FY 2018, participants who are approved for portability will receive guidance and assistance from the mobility program to successfully locate and resettle in areas of high opportunity.

Changes to Baseline, Benchmarks, Metrics: There are no changes to baselines. Benchmarks have been updated to reflect planned activities and volumes in FY 2018. PHA will report on outcomes in the MTW Annual Report.

Metrics:

CE #1: Agency Cost Savings – Restriction on Elective Moves

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$25,259*	\$39,125		
		2,000 moves anticipated in FY 18		
		Hourly Wage: \$15.65 Staff time per move:		
		1.25 hours/move		

**PHA implemented this activity in FY 2007 and does not have baseline cost information available for that period. See CE#2 below for this activity for estimate of staff time savings (in hours) already achieved. The benchmark for CE#1 agency costs savings is based on an average hourly labor rate of \$15.65 times 2,103 labor hours.*

CE #1: Agency Cost Savings – Criteria for Portability Moves

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$8,451	Total Cost: \$9,390		
		Number of port-outs anticipated in FY 18: 150		
		Hourly cost: \$15.65		
		Staff time to complete port-out: 4 hours		

CE #2: Staff Time Savings – Restriction on Elective Moves

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	1,614 hrs. (based on 1,291 moves in most recent fiscal year)*	Time spent on moves: 2,500 hours*		
		Staff time per move: 1.25 hours		
		Number of anticipated elective moves: 2,000		

**PHA implemented this activity in FY 2007 and does not have baseline information available for that period. Thus, the baseline reflects staff time savings already achieved. PHA has established a benchmark to continue the same or comparable level of staff time savings.*

CE #2: Staff Time Savings – Criteria for Portability Moves

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	540 hours (based on FY 12 port activity)	600 hours estimated for port-out moves		
		Staff time to complete port-out: 4 hours		
		Number of anticipated port-out moves:150		

MTW Activity 2016-1 Second Chance Initiative

Description/Update: PHA uses its MTW authority to support implementation of the Second Chance Housing Choice Voucher Pilot Program. PHA's Board of Commissioners approved this program in October 2013 by adoption of the Second Chance Housing Policy. The policy permits the provision of tenant-based vouchers for active participants in good standing with two partner agencies – the Eastern District Federal Court Supervision to Aid Reentry (STAR) Program and the Mayor's Office of Reintegration Services (RISE) program. PHA plans to expand the Second Chance Initiative in FY 2018 to include additional participants and public housing units (see proposed changes below). Housing assistance will only be available to the participants for a period of up to two years, at which point the participants may be able to transition off the program or, if in good standing, to PHA's HCV or public housing program. The STAR Program works in conjunction with Federal Probation and Parole, to offer returning citizens an opportunity to reduce their parole period by one year through participation in the Re-Entry Program. Each participant signs a contract with their parole officer to transition the oversight of their parole to the two federal Judges that administer the STAR program. The STAR program collaborates with the local RISE program to provide counseling, education, job training and job placement services.

The STAR program is designed to provide multiple levels of support to returning citizens at the family, social and logistical level to assist in preventing recidivism. Participants voluntarily participate in the closely-monitored program, wherein specific criteria have to be fulfilled at regular intervals. RISE is the lead agency in the City of Philadelphia for the management of reintegration services for those formerly incarcerated in state prisons. It provides the skills, training, and education necessary for returning citizens to successfully re-integrate into society, avoid recidivism, and lead constructive, useful lives. The STAR program is a national model for aiding federal offenders in their reentry to society in coordination with RISE.

One of the barriers to successful re-entry has been access to housing. Many of the past program participants struggled to maintain employment, continue their education or reunite with their kin because they could not secure a stable home. Many participants resided with family members, paramours or friends, and these environments, typically, did not support a positive reentry into society. Therefore, PHA in partnership with the STAR and RISE programs developed this pilot program that provides access to stabilized housing through the voucher program.

Participants in good standing with RISE and STAR sign an addendum to their PHA application to allow PHA to monitor their participation in the RISE and STAR programs and to communicate with their probation officer, if applicable. Participants also report their participation in the vocational, educational, social or community service opportunities offered by PHA and/or RISE on a quarterly basis. The collaborative reporting and participant management across PHA, STAR and RISE will help ensure that participants stay on track, access services, and be good tenants. All participants are required to be employed and maintain employment as a condition of participation; however, in the event they lose employment, they will be required to either obtain a new job or enroll in an educational or job training program as a condition of participation.

If a participant does not remain in good standing with the STAR and RISE programs, they risk a return to confinement and loss of the voucher or unit. Participants who do not meet their program responsibilities will be notified of proposed voucher termination or eviction by PHA. They may request an informal hearing through PHA’s existing process to review and appeal this decision. Participation in the program is time-limited; however, all other requirements of PHA’s MTW tenant-based voucher program or public housing program including tenant rent contribution will apply.

Proposed Changes to Activity: In FY 2018, the first wave of Second Chance participants will reach the end of their two year term. For those participants who successfully complete the program, PHA will allow them to transition to HCV to continue their tenancy.

Also in FY 2018, PHA will enter into an MOU with the Pennsylvania First Judicial Court (“the Court”), who has an ex-offender mentor program. Where ex-offenders enrolled in the Court’s reentry program also have families living in PHA’s public housing or receiving an HCV tenant based subsidy, PHA will waive the policies related to additions to the household as well as waive the criminal background screening requirement for these individuals and allow them to be added to the family unit. PHA will not allow admission to ex-offenders who have been convicted of methamphetamine production per the HUD regulations and/or who are subject to a life-time sex offender registration requirement. PHA will allow admission for up to 20 ex-offenders under the MOU with the Court and will require that the families that they are joining in PHA’s program be in good standing.

Changes to Baseline, Benchmarks, Metrics: There are no changes to baselines. Benchmarks have been updated to reflect planned activities and volumes in FY 2018. PHA will report on outcomes in the MTW Annual Report.

Metrics:

CE #4: Increase in Resources Leveraged

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
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Amount of funds leveraged in dollars (increase).	\$0	Up to \$10,000		
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**Participation is not mandatory and is based on the needs of the individual. Leveraged resources reflect activity in the STAR and RISE programs only.*

HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
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Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	30 in FY 2018*		
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**10 represent the STAR and RISE program and the remaining 20 reflect the First Judicial Court reentry program*

SS #1: Increase in Household Income

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	\$18,200 average earned income of participants following enrollment.	\$18,255		

SS #3: Increase in Positive Outcomes in Employment Status

Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?
Employed Full-Time	10 program participants*	10 program participants		
Enrolled in a Job Training Program	100% of program participants 0 program participants	100% of program participants 2 program participants		
Enrolled in an Educational Program	0% of program participants 0 program participants	20% of program participants 2 program participants		

*Represents participants in the STAR and RISE programs only. All participants in the RISE and STAR programs are required to be employed and maintain employment as a condition of participation; however, in the event they lose employment, they will be required to either obtain a new job or enroll in an educational or job training program as a condition of participation.

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	0 participants	0 participants		

SS #5: Households Assisted by Services that Increase Self-Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	0 participants	10 participants		

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

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	\$472	\$434*		

* Represents STAR and RISE program participants only.

SS #7: Increase in Agency Rental Revenue*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
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PHA rental revenue in dollars (increase).

\$439

\$440

**PHA does not have any rental revenue and is using Total Tenant Payment as the metric. Represents STAR and RISE program participants only.*

SS #8: Households Transitioned to Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
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Number of households transitioned to self-sufficiency (increase).

0

2 in FY 2018 based on program enrollment timetable*

For this program purpose, PHA defines "self-sufficiency" as successfully completing the program and transitioning to other affordable housing.

**Represents STAR and RISE program participants only.*

B. Not Yet Implemented Activities

MTW Activity 2014-1: Flexible Subsidy Initiative

Description/Update: Through its affordable future “6 in 5” Initiative, PHA intends to partner with qualified non-profit and for-profit developers to construct, rehabilitate, acquire, and/or preserve affordable rental housing, some of which may be public housing units. This activity was approved by the PHA Board and submitted to HUD for approval in late 2013 as part of a mid-year amendment to the MTW Annual Plan for FY 2014.

In order to promote the development and preservation of quality, affordable rental units that meet the diverse needs of low-income households, including special needs populations, PHA intends to utilize MTW flexibility in limited instances where the current public housing operating subsidy level (combined with projected tenant rental income) is inadequate to ensure the long-term viability of new public housing units to be developed and/or acquired under the affordable future initiative. Under this proposed MTW activity, PHA may elect to combine public housing operating subsidy with other MTW Block Grant funds to establish a local MTW flexible subsidy level higher than the standard public housing operating subsidy amount. PHA will only use such flexibility where the project otherwise meets PHA’s stated development objectives, but is determined to be financially infeasible without the use of higher flexible subsidy funding allowable under MTW. HUD review and approval will be required for each transaction involving MTW flexible subsidies as part of the mixed-finance closing process pursuant to the Public Housing Capital Fund Program. (The Mixed-Finance Development and Public Housing Development requirements are incorporated into the final rule, and the existing Mixed-Finance Development and Public Housing Development requirements at 24 C.F.R. Part 941 are removed.)

PHA may also request that HUD review and approve additional waivers to current public housing regulations in the interest of increasing housing choice, promoting long-term project viability, and encouraging more affordable housing development. The following waivers do not specifically require MTW authority; however, PHA is providing this information to clarify its intentions with respect to seeking additional waivers. PHA may request the following additional non-MTW waivers from HUD as part of the review and approval process for public housing mixed-finance transactions:

- Allowing the owner of public housing units that are to receive flexible subsidy, including PHA if it is the owner, to utilize public housing operating subsidy and other MTW funds, to pay for debt service associated with the project; and
- Allowing for the modification or elimination of the standard ten-year affordability “tail” in the Declaration of Restrictive Covenants.

Timeline for Implementation: PHA will implement this activity if/when PHA needs MTW flexibility to supplement the current public housing operating subsidy level in relation to the development and/or acquisition of projects under the affordable future initiative.

C. Activities on Hold

Not applicable.

D. Closed Out Activities

The following table summarizes previously approved MTW activities that PHA has completed, discontinued, or determined do not require MTW authority to implement.

Plan Year	Activity	Reason for Close Out	Close Out Year
FY 2011	Community Service Policy	Determination made that activity does not require MTW flexibility.	FY 2013
FY 2011	Expanding Use of LIHTC	Determination made that proposed activities were covered under Partnership and Unit-Based Leasing/Development Initiatives.	FY 2013
FY 2011	Scattered Site Income Tiering	PHA elected to discontinue this initiative prior to its implementation based on decisions made as part of the scattered site asset repositioning initiative including disposition and auction of vacant and obsolete properties.	FY 2011
FY 2010	Accessible Unit Retrofitting and Development	PHA has completed the accessible unit retrofitting under Attachment E of the MTW Agreement. PHA will continue to develop accessible units as part of its revitalization programs; however, this activity does not require specific MTW authority.	FY 2014
FY 2009	Assisted Living	PHA discontinued this activity prior to its implementation based on a determination that sufficient funding was not available from state, federal and other required sources.	FY 2011
FY 2009	Home Care Services	PHA discontinued this activity prior to its implementation based on a determination that services can be more efficiently delivered through third-party partners.	FY 2011
FY 2007	Transitional Housing Facilities	Determination made that comparable activities are authorized under Partnership Initiative.	FY 2013
FY 2007	LIFE Program	Determination made that activity does not require MTW flexibility.	FY 2013
FY 2005	Comprehensive Resident Self Sufficiency Services	PHA continues to provide comprehensive resident self-sufficiency services that utilize MTW Block Grant funds. However, no MTW programmatic waivers are required. These activities are now referenced in Chapter V under the Single Fund Flexibility section.	FY 2014
FY 2005	Voucher Issuance	PHA elected to discontinue this policy based on an assessment that it would not contribute to PHA's utilization goals.	FY 2014
FY 2004	HCV Time Limit	PHA discontinued this activity due to economic conditions which limited the availability of jobs for residents.	FY 2012
FY 2004	Family Economic Development Action Plan/Tenant Responsibility Training	PHA discontinued this activity along with discontinuation of HCV time limit as they were interrelated activities.	FY 2014
FY 2004	Tenant Responsibility Training	Determination made that activity does not require MTW flexibility.	FY 2013
FY 2004	Blueprint	PHA continues to implement the Blueprint Program; however, a determination was made that activity does not require MTW flexibility.	FY 2013
FY 2004	HCV HQS Enforcement	PHA elected to discontinue this policy based on a decision to establish uniform HQS enforcement policies for both MTW and Non-MTW vouchers.	FY 2012
FY 2004	Public Housing Service Order Policy	PHA elected to discontinue this policy after discussions with the HUD Field Office concerning the need to expedite service order response times.	FY 2012

V. MTW SOURCES AND USES OF FUNDING

A. Estimated Sources and Uses of MTW Funding for Fiscal Year 2018

Tables 9 and 10 below provide estimated sources and uses of MTW funds for FY 2018. As PHA's funding levels for future periods are unknown at the present time, this table provides preliminary projections. Actual sources and uses are expected to vary based on the level of funding provided to PHA and the level of actual expenses. PHA's estimated Sources and Uses budget for FY 2018 assumes continued reductions in Public Housing Operating Subsidy, Capital Fund Program, HCV, and HCV Administrative fees. The tables follow HUD's required formats and do not include information on Non-MTW funding sources and uses. See also Appendix B for additional RHF-related information as required by the RHF Amendment to the MTW Agreement.

Table 9: Estimated Sources of MTW Funding for FY 2018

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$ 25,610,350
70600	HUD PHA Operating Grants*	\$ 319,057,079
70610	Capital Grants	\$ 41,872,446
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$ 592,729
71100+72000	Interest Income	\$ 600,000
71600	Gain or Loss on Sale of Capital Assets	\$ 0
71200+71300+71310+71400+71500	Other Income	\$ 0
70000	Total Revenue	\$ 387,732,604

** This line item includes projected Public Housing Operating Fund and HCV HAP (including embedded Admin Fee) revenue. Of the total amount listed, the Public Housing Operating Fund revenue is estimated at \$112,150,573 and HCV HAP revenue is estimated at \$206,906,506.*

Table 10: Estimated Uses of MTW Funding for FY 2018

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+ 91800+91900)	Total Operating – Administrative	\$ 42,899,551
91300+91310+92000	Management Fee Expense	\$ 0
91810	Allocated Overhead	\$ 0
92500(92100+92200+92300+92400)	Total Tenant Services	\$ 3,583,130
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$ 19,261,704
93500+93700	Labor	\$ 33,003,223
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$ 14,405,725
95000 (95100+95200+95300+95500)	Total Protective Services	\$ 7,297,108
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$ 9,120,517
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$ 52,160,184
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$ 0
97100+97200	Total Extraordinary Maintenance	\$ 0
97300+97350	Housing Assistance Payments + HAP Portability-In	\$ 160,953,950
97400	Depreciation Expense	\$ 0
97500+97600+97700+97800 *	All Other Expenses	\$ 45,047,512
90000	Total Expenses	\$ 387,732,604

*This line item represents capital and development activity expenses.

B. Use of Single Fund Flexibility

Under the MTW Program, PHA is authorized to establish an MTW Block Grant budget. Activities that utilize Block Grant single fund flexibility are summarized below:

- Capital Activities to support development activities, security system upgrades and maintenance and site improvements throughout PHA.
- Family Programs and Comprehensive Resident Supportive Service activities to support a wide range of public safety, program compliance, and training and education efforts for PHA residents including: youth development programs citywide; senior programs citywide; Pre-Apprenticeship Program; service coordination; job training and placement; educational partnership initiatives; affordable homeownership programs; Community Relations police units; Community Partners training and educational programs; and other Economic Development and Self-Sufficiency program activities. See Table 11 below

for a summary of resident services initiatives planned for FY 2018 including MTW and Non-MTW funded initiatives.

- Quality of Life Programs to support Lease Enforcement and Section 8 investigations programs.
- General Conditions to include functional enhancements and training on software systems, staff training, and energy management initiatives.
- Acquisition of properties, in cooperation with the Philadelphia Redevelopment Authority, for the Sharswood/Blumberg development project for use as replacement housing in that neighborhood and for other supportive neighborhood investments to revitalize commercial activity and improve educational outcomes of residents in the community in cooperation with strategic partners.
- Management directives associated with balancing and optimizing PHA’s organization structure in line with HUD funding modifications related to the 2018 MTW agreement.
- Consolidation of PHA administrative offices, and tenant service centers in the Sharswood/Blumberg development for which bond financing under section 30 is being utilized.

Table 11: Resident Services Program Summary for FY 2018

Program	Program Description	Target Population	Funding Source	Number of Residents
ABE/GED	Adult Basic Education and General Equivalency Diploma education in the required domains.	Residents 18 to 55	MTW	25 residents to complete the program
Adult Day/Elder Care	Multi-service center for residents, who cannot complete activities of daily living.	Residents 60 and over	Commonwealth of PA/MTW	46
Afterschool	On site programs which meet the standard of providing (1) homework assistance, (2) project based learning, (3) community service, and (4) physical/ body kinesthetic activities	Youth Ages 6 to 13	MTW	210
CHSP	Meal program, which not only enable residents to have appropriate nutrition, but also best practice fellowship to support aging in place.	Residents 62 and over	HUD	16
Community Partners	Occupational Skills training in career areas with reasonable growth	Residents 18 to 55	MTW	100 enrolled

Program	Program Description	Target Population	Funding Source	Number of Residents
	potential.			
Computer Lab	Access to computer technology for academic enrichment.	Residents 6 to 70	MTW	300 residents using computer labs
Connect Home	Bridging digital divide and providing internet access and equipment	Residents 6 to 70	MTW	TBD by partner commitment
Early Childhood Education Partnerships	Pre-School Partnerships to ensure 3 year olds are enrolled into area Head Start programs	Children 3 to 5	US Department of Health and Human Services	50
Financial Literacy	Course on credit and money management to enable residents to purchase homes.	Residents 18 to 55	MTW	150 enrolled
FSS	Assessment of individual and family needs, followed by referrals and tracking.	Residents 18 to 55	HUD	300
Health & Wellness Programs	With Every Heartbeat There is Life, with a tobacco component to improve nutrition, exercise	Residents 18 to 55	MTW	50
Home Ownership	Housing counseling about the home purchase process. This includes 5H, HCV, and Section 32.	Residents 18 to 55	US Department of Health and Human Services/ MTW	50
Jobs Plus Pilot Program	Place-based employment program designed to increase the earnings and employment of working-age residents	Residents 18 to 62	HUD	300
PhillySEEDS Scholarship	Competitive scholarship awards based on academic achievement.	Youth/Adults 18 to 55	DHHS/Section 3 Vendors	50 residents to receive scholarships
Pre-Apprenticeship	Building Maintenance and Construction Training Program	Residents 18 to 56	MTW/MOCS	20
ROSS	Assessment of individual and family needs, followed by referrals and tracking.	Residents 18 to 55	HUD	200
Scholars Internship Program (SIP)	Paid internships in the major field of study of PHA's scholarship awardees.	Youth/Adults 18 to 55, who have received scholarships from PhillySeeds.	Section 3 Vendors	10
Section 3	Ensure that economic opportunities, are provided to PHA residents	Residents 18 to 55	Private vendors that meet the Section 3 threshold	TBD by contract award
Senior CTR/Programs	Evidence based activities, which reduce the number of seniors, who leave public housing to enter nursing homes.	Residents 60 and over	Philadelphia Corporation for Aging	133
Smoke Free Housing	Provide smoke free cessation programs, including educational awareness workshops and	All	MTW/Philadelphia Department of Public Health/American Heart	50 attendees

Program	Program Description	Target Population	Funding Source	Number of Residents
	other smoking cessation resources to help residents quit smoking		Association/Nursing Consortium	
Summer Camp	Summer enrichment activities to prevent academic regression.	Youth Ages 6 to 13	MTW	320
Summer Food	Breakfast and lunch served on site to provide appropriate nutrition during the summer.	Youth 5 to 18	PA Department of Education/ MTW	50,000 meals
Summer Jobs Program	Six weeks of summer employment for youth	Public and Assisted Housing Youth.	Philadelphia Youth Network Workready program/partner/MTW	50

C. Local Asset Management Plan

Is the PHA allocating costs within statute?

	or	No
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Is the PHA implementing a local asset management plan (LAMP)?

Yes	or	
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Has the PHA provided a LAMP in the appendix?

Yes	or	
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A Brief Summary of any Changes in the Local Asset Management Plan:

Pursuant to its MTW Agreement, PHA has developed a Local Asset Management Plan (LAMP) that describes the agency’s cost allocation plan and other technical components of PHA’s local asset management strategy. HUD approved PHA’s initial LAMP as part of the MTW FY 2010 Annual Plan submission. PHA submits updates to the LAMP as part of the Annual Plan submission. A copy of the current LAMP is found in Appendix D.

VI. ADMINISTRATIVE

A. Resolution

A Resolution approving the FY 2018 MTW Annual Plan and the MTW Plan Certification of Compliance was adopted by the PHA Board of Commissioners at the December 15, 2016 meeting following the public review process and public hearing. The Resolution is included in Appendix I.

B. Public Review Process

PHA provided public notice of the draft FY 2018 MTW Annual Plan and posted the draft Plan on its website. A thirty day public comment period to allow for resident and general public review was provided from November 4, 2016 through December 5, 2016. A public hearing was held on November 17, 2016 at 12 South 23rd Street, an accessible facility. In attendance were 4 persons. On November 15, 2016, PHA also conducted a meeting with resident leadership at 12 South 23rd Street to discuss Plan contents and provide additional opportunities for resident input. In attendance were 37 persons. Prior to finalizing the Plan, PHA considered the comments received during the public review process.

C. Evaluations

PHA conducted an impact analysis of its rent simplification efforts (see Appendix H). PHA is committed to both maximizing the use of MTW flexibility to promote MTW statutory objectives and PHA's goals, and sharpening the internal focus on monitoring and evaluating MTW outcomes.

D. Annual Statement/Performance and Evaluation Report

The Annual Statement/Performance and Evaluation Reports for all capital grants with unexpended amounts are included in Appendix C.

VII. APPENDICES

Appendix A: RAD Significant Amendments

Philadelphia Housing Authority
Fiscal Year 2018 Moving to Work Annual Plan
Rental Assistance Demonstration Significant Amendment

The Philadelphia Housing Authority (PHA) is incorporating this amendment into its Fiscal Year 2018 Moving to Work Annual Plan as required by the US Department of Housing and Urban Development (HUD) to provide information on PHA's planned activities under the Rental Assistance Demonstration (RAD) program. Pursuant to this amendment, PHA will convert 65 public housing units at Westpark Plaza and 94 public housing units at the Blumberg Senior Tower to project-based assistance under RAD. Blumberg Senior Tower is part of the Norman Blumberg Apartments development which, except for the Senior Tower, has been demolished with HUD approval pursuant to the comprehensive Choice Neighborhoods Transformation Plan for the Blumberg/Sharswood community.

Background

In December 2013, the PHA Board of Commissioners authorized the submission of several applications to HUD under the RAD program. The Board's approval came after a series of public meetings were held to inform existing residents about the RAD program and their rights under a proposed RAD conversion.

In March 2015, HUD issued RAD award letters to PHA that approved the applications for RAD conversion for multiple housing developments, subject to PHA meeting all of the conditions and requirements of the RAD program. The award letters serve as HUD's Commitment to Enter into a Housing Assistance Payments Contract (CHAP) for the subject public housing developments. PHA intends to proceed with RAD conversion at Westpark Plaza and Blumberg Senior Tower pursuant to the guidelines of PIH Notice 2012-32, REV-2 dated June 15, 2015 ("HUD RAD Notice") and any other successor Notices issued by HUD.

One of the conditions of the CHAP is that PHA submit a Significant Amendment to the MTW Annual Plan that incorporates required information on PHA's RAD conversion plans. This document provides the required information and serves as PHA's RAD Significant Amendment for the subject units. PHA intends to propose further Significant Amendment(s) for additional HUD-approved RAD conversions at future dates. PHA is providing a thirty-day public comment period and will conduct a Public Hearing to allow residents and the general public an opportunity to review and comment on the RAD Significant Amendment. Following this period, the PHA Board of Commissioners will conduct a vote on the RAD Significant Amendment at a public meeting.

RAD Conversion Plan

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

- A total of 65 public housing units at the Westpark Plaza development owned by PHA. The public housing assistance for these units will be converted to Project Based Voucher

(PBV) assistance at the existing housing development to be owned by a PHA subsidiary under the applicable provisions of the HUD RAD Notice.

- A total of 94 public housing units at the Blumberg Senior Tower. Blumberg Senior Tower is part of the Norman Blumberg Apartments development owned by PHA, which except for this building has been demolished with HUD approval. The public housing assistance for these units will be converted to Project Based Voucher (PBV) assistance at the existing housing development to be owned by a PHA subsidiary under the applicable provisions of the HUD RAD Notice.

Attachment 1 includes current information on each development or Asset Management Project (AMP) proposed for RAD conversion. Attachment 1 includes the following information:

Current Units: Total number of units, bedroom size distribution and unit type.

Post-Conversion Units: If applicable, any changes proposed to the current number of units, the bedroom size distribution or the unit type including de minimis reductions. No unit reductions are proposed under this Significant Amendment.

Transfer of Assistance: Whether PHA intends to transfer assistance to another development as part of the RAD conversion and, if so, the location, number of units, bedroom size distribution, and unit type where known.

PBV or PBRA: Whether PHA intends to convert the development to the Project Based Voucher (PBV) program or to the Project Based Rental Assistance (PBRA) program, along with information on resident rights, resident participation, waiting list and grievance procedures applicable to each program. PHA intends to convert assistance to the PBV program.

Capital Fund Impact: The current amount of Capital Fund dollars received prior to RAD conversion. Developments converted through the RAD program are not eligible for Public Housing Capital Funds after conversion.

Transfer of Waiting List: How existing waiting lists will be addressed as part of the conversion.

Conversion to Project Based Vouchers or Project Based Rental Assistance

Public housing developments that are converted to project-based assistance will no longer be subject to HUD rules and regulations pertaining to the public housing program. Upon conversion to RAD, the former public housing units will be subject to the rules and regulations pertaining to either the PBV or PBRA programs, depending on which program option is selected by PHA. HUD has modified the PBV and PBRA program rules and regulations to incorporate additional provisions that apply solely to units converted under RAD. These additional provisions provide

important protections to current residents of public housing that are impacted by a RAD conversion.

PHA intends to convert the RAD units listed in Attachment 1 to the PBV program. As part of the conversion initiative, PHA will adopt all required RAD PBV rules except where MTW or other waivers are approved by HUD, and will modify its existing Housing Choice Voucher Program Administrative Plan as needed to incorporate those rules related to resident rights, resident participation, waiting list, lease, waiting list, grievance processes and other areas.

Attachment 2 provides information on the RAD PBV program as required by the HUD RAD Notice and the HUD Joint Housing PIH Notice H-2014-9/PIH-2014-7 related to resident rights and participation, waiting list and grievance procedures.

Capital Fund Budget

Conversion of existing public housing developments under the RAD program will enable PHA to leverage existing funds to secure additional private and other funding. This new funding will be used to undertake long-deferred capital improvements and, in instances where transfer of assistance is involved, to construct or rehabilitate new or existing affordable housing units.

PHA currently receives HUD Capital Funds on an annual basis, subject to Congressional appropriations for the majority of its public housing units. Attachment 1 includes the most recent Capital Fund allocation for each RAD conversion site. Upon conversion to RAD, PHA will no longer receive a Capital Fund allocation for units that have been converted and the annual Capital Fund grant will be decreased.

The total estimated reduction in PHA Capital Funds on an annual basis for the subject units covered under this Significant Amendment is approximately \$445,138 based on FY2016 funding levels. Over a five year period, the estimated Capital Fund reduction is approximately \$2,225,690 based on FY2016 funding levels. The actual amount of reduction may vary depending on Congressional appropriations. As RAD conversions are completed, PHA will modify its existing capital plans to reflect the reduction in funding and change in work scopes.

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

Site and Neighborhood Standards

Westpark Plaza is an existing public housing site and Blumberg Senior Tower is part of the larger existing Norman Blumberg Apartments. site.

Relocation Plan

Any necessary resident relocation related to RAD conversions will be performed in accordance with the HUD RAD Notice, HUD Joint Housing Notice H-2014-09/PIH-2014-17 and any other

successor Notices issued by HUD. No relocation is anticipated at Westpark Plaza. Resident relocation has previously been completed at the Blumberg Senior Tower.

Compliance

PHA is not presently subject to a voluntary compliance agreement, consent order, consent decree, final judicial ruling or administrative ruling that has any relation to or impact on the planned RAD conversion.

Moving To Work

PHA may utilize MTW Block Grant fungibility and programmatic flexibility to support the RAD conversion effort subject to any necessary Board and HUD approvals. PHA certifies that regardless of any funding changes that may occur as a result of conversion under RAD, PHA will continue to administer and maintain service levels for its remaining portfolio of public housing units. PHA will do this by utilizing available funding including Public Housing Operating Fund, Capital Fund, and Tenant Rental Income.

Significant Amendment Definition

As part of the RAD conversion initiative, a Significant Amendment to the MTW Plan will not be required for the following RAD-specific actions:

- Changes to the Capital Fund budget produced as a result of each approved RAD conversion regardless of whether the proposed conversion will include use of additional Capital Funds;
- Decisions to apply MTW funding or programmatic flexibility to post-conversion RAD developments;
- Decisions or changes related to the ownership and/or financing structures for each approved RAD conversion including decisions to allocate PHA financial resources as a source of funds to support the RAD conversion initiatives;
- Changes to the construction and rehabilitation plans and schedules for each approved RAD conversion;
- Changes to the project names or sponsor entity names;
- Changes in the post-conversion bedroom size distribution and/or the number of de minimis unit reductions up to the 5% permitted under RAD program rules;
- Changes to the pre-conversion bedroom size distribution and/or the project or AMP from which transfer of assistance units will be converted; and,
- Decisions to convert to either Project Based Vouchers or Project Based Rental Assistance.

Philadelphia Housing Authority
Moving to Work Annual Plan Amendment
Rental Assistance Demonstration Significant Amendment
Attachment 1 – Information on Public Housing Developments to be Converted

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

RAD Significant Amendment Attachment 1

Pre-Conversion Development Name Westpark Plaza
PIC Development ID # PA002000093
Conversion Type (PBV or PBRA) PBV
Capital Fund Grant (FY16) 176,098

Pre-Conversion Total Units 65*
Pre-Conversion Unit Type Family
Pre-Conversion Bedroom Size

	# of Units
0 BR	0
1 BR	44
2 BR	21
3 BR	0
4 BR	0
5 BR	0
6 BR	0

Post-Conversion Total Units 65*
Post-Conversion Unit Type Family
Post-Conversion Bedroom Size

	# of Units
0 BR	0
1 BR	44
2 BR	21
3 BR	0
4 BR	0
5 BR	0
6 BR	0

Transfer of Assistance No
De Minimis Reduction N/A

Transfer of Waiting List Following conversion to PBV under RAD, applicants on the existing Westpark Plaza site-based waiting list will be transferred to a PBV site-based waiting list. No changes are planned to waiting list preferences, and applicants will maintain their original date and time of application. The owner will manage and maintain the site-based waiting list in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Pre-Conversion Development Name	Blumberg Senior Tower at Norman Blumberg Apts.
PIC Development ID #	PA002000050
Conversion Type (PBV or PBRA)	PBV
Capital Fund Grant (FY16)	269,040
Pre-Conversion Total Units	94*
Pre-Conversion Unit Type	Seniors
Pre-Conversion Bedroom Size	
	# of Units
0 BR	4
1 BR	90
2 BR	0
3 BR	0
4 BR	0
5 BR	0
6 BR	0
Post-Conversion Total Units	94
Post-Conversion Unit Type	Seniors
Post-Conversion Bedroom Size	
	# of Units
0 BR	0
1 BR	94
2 BR	0
3 BR	0
4 BR	0
5 BR	0
6 BR	0
Transfer of Assistance	No
De Minimis Reduction	N/A
Transfer of Waiting List	This is an existing, vacant building that is currently part of an existing development, which except for this building has been demolished with HUD approval. A new site-based waiting list will be established for the building. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

Moving to Work Annual Plan Amendment
Rental Assistance Demonstration Significant Amendment
Attachment 2 – Project Based Voucher Program (PBV)

Information on resident rights and participation, waiting list and grievance procedures for Rental Assistance Demonstration (RAD) program conversions to the Project Based Voucher (PBV) program are included in this attachment:

HUD PIH Notice 2012-32, REV-2 dated June 15, 2015, Sections 1.C and 1.D

HUD Joint Housing Notice H-2014-09/PIH-2014-17 in its entirety

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.²⁴ 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.

²⁴ These protections (as well as all protections in this Notice for current households) apply when in order to facilitate repairs a household is relocated following the conversion and subsequently returns to the property, even if they are considered a “new admission” upon return.

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 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 78100.²⁵ 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.

²⁵ The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

- i. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall 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),²⁶ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
 - ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.

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

- 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.²⁷ 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.

²⁷ For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

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.²⁸
- 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

²⁸ For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of the evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

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).²⁹

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

²⁹ For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

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 PBV RAD 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.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

ASSISTANT SECRETARY FOR HOUSING-
FEDERAL HOUSING COMMISSIONER

Special Attention of:

Public Housing Agencies
Public Housing Hub Office Directors
Public Housing Program Center Directors
Regional Directors
Field Office Directors
RAD Transaction Managers

Notice H 2014-09
PIH 2014-17

Issued: July 14, 2014

This notice remains in effect until amended,
superseded, or rescinded.

Cross Reference: PIH Notice 2012-32 (HA)
REV 1

Subject: Relocation Requirements under the Rental Assistance Demonstration (RAD) Program, Public Housing in the First Component

1. Purpose

This Notice provides public housing agencies (PHAs)¹ and their partners with information and resources on applicable program and relocation assistance requirements when planning for or implementing resident moves as a result of a **Rental Assistance Demonstration (RAD)** conversion² under the first component of the demonstration.³ This Notice provides guidance on RAD relocation requirements and requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA), as they relate to the public housing conversion process under the first component.⁴

¹ This Notice always uses the term “PHA” to refer to the owner of the project prior to and after the RAD conversion, even though, in some cases, the owner of the converted RAD project may be another public entity, a non-profit organization, or other owner (e.g., low-income housing tax credit owner). In addition, this Notice uses “PHA” to refer to the “displacing agency,” a URA term that means the agency or person that carries out a program or project, which will cause a resident to become a displaced person. Projects vary and, for any specific task described in this Notice, may require substituting in a reference to a party that is more appropriate for a specific project.

² The content of this Notice should not be relied upon in carrying out any other activities funded under any other HUD program, except where specifically directed by HUD.

³ The “first component” of RAD allows public housing and Moderate Rehabilitation properties to convert assistance; the “second component” refers to conversion of Rent Supplement, Rental Assistance Payment, and Moderate Rehabilitation properties upon contract expiration or termination.

⁴ Relocation concerns and URA requirements apply to both components of RAD. This notice provides guidance only as to the first component.

Relocation assistance provided pursuant to public housing and RAD requirements is broader than URA relocation assistance requirements. Not all specific situations requiring relocation under RAD may trigger URA assistance requirements. In addition, whereas all qualifying residents⁵ of a converting public housing project are eligible for relocation assistance under RAD, some residents or household members may not meet the statutory and regulatory requirements for eligibility under URA. This Notice supersedes PIH Notice 2012-32 (HA), REV-1, with respect to relocation matters. This Notice also specifically addresses when relocation may begin (see Section 9 below). As necessary, the Department will issue additional guidance on relocation issues and requirements as they relate to RAD.

2. Background

RAD allows public housing properties to convert assistance to long-term project-based Section 8 contracts. In many cases, a RAD project may require relocation of residents when properties undergo repairs, are demolished and rebuilt, or when the assistance is transferred to another site. PIH Notice 2012-32 REV-1 (see also FR Notice 5630-N-05, 78 FR 39759-39763 (July 2, 2013)) details RAD program requirements.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA) is a federal law that establishes minimum standards for federally-funded programs and projects that include the acquisition of real property (real estate) and/or displace persons from their homes, businesses, or farms as a result of acquisition, rehabilitation, or demolition of real property.⁶ The URA will apply to acquisitions of real property and relocation of persons from real property that occurs as a direct result of acquisition, rehabilitation, or demolition for a project that involves conversion of assistance to Project-Based Voucher (PBV) or Project-Based Rental Assistance (PBRA) programs under RAD.

Additionally, all relocation conducted as part of a RAD conversion and all relocation assistance provided under URA must be consistent with applicable fair housing and civil rights laws, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973.

Because each RAD proposal varies in its scope, this Notice may not address each PHA's specific circumstances. RAD PHAs and participants should carefully review the regulations, notices, and guidance material referenced in this Notice. Any questions related to the applicability of these requirements should be referred to the RAD Transaction Managers (TM) or may be emailed to rad@hud.gov.

3. Applicable Legal Authorities

⁵ The term "resident" as used in this Notice refers to eligible resident families of public housing residing in a property applying for participation in RAD or a property that undergoes a conversion of assistance through RAD.

⁶ HUD Handbook 1378 (Tenant Assistance, Relocation, and Real Property Acquisition), available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/library/relocation/policyandguidance/handbook1378.

- RAD: Consolidated and Further Continuing Appropriations Act of 2012 (Public Law 112-55, approved November 18, 2011), with the implementing PIH Notice 2012-32, REV-1
- URA statute and implementing regulations: 49 CFR part 24
- FHEO: Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Fair Housing Act
- Section 104(d) of the Housing and Community Development Act of 1974, statute and implementing regulations (if CDBG and/or HOME funds are used): 24 CFR part 42, subpart C

4. Relocation Planning

If there is a possibility that residents will be relocated as a result of acquisition, demolition, or rehabilitation for a project converting under RAD, PHAs must undertake a planning process in conformance with URA in order to minimize the adverse impact of relocation (49 CFR 24.205(a)).

While a written Relocation Plan is not a requirement under RAD or URA, the Department strongly encourages PHAs to prepare a written Relocation Plan, both to establish their relocation process and to communicate this process consistently and effectively to all relevant stakeholders. Appendix 1 contains recommended elements of a Relocation Plan.

The following presents a general sequencing of relocation planning activities within the RAD milestones:

Stage	Activities
1. Prior to submission of RAD application	<ul style="list-style-type: none"> • Determine potential need for relocation • Meet with residents to discuss plans, communicate right to return, and solicit feedback • Provide <i>General Information Notice</i> (GIN) to residents • Survey residents to prepare Relocation Plan and relocation process cost estimate
2. After receipt of the Commitment to Enter into a HAP Contract (CHAP) Award	<ul style="list-style-type: none"> • Prepare Significant Amendment to PHA Plan • Assess and refine need for relocation • Develop a Relocation Plan (See Appendix 1 for recommended content) • Identify relocation housing options
3. Preparing Financing Plan (due to RAD Transaction Manager no later than 180 days following	<ul style="list-style-type: none"> • Budget for relocation expenses • Submit FHEO Accessibility & Relocation checklist (PHAs may submit Relocation Plan along with checklist)

Stage	Activities
CHAP award)	
4. Receipt of RAD Conversion Commitment (RCC)	<ul style="list-style-type: none"> • The date of issuance of the HUD RCC marks the date of “Initiation of Negotiations” (ION), as defined in the URA (49 CFR 24.2(a)(15)) • Provide residents with appropriate notice informing them if they will be relocated and any associated relocation assistance • Meet with residents to describe approved conversion plans and discuss required relocation
5. Closing/RAD conversion	<ul style="list-style-type: none"> • Generally, resident relocation should not begin until after the date of closing/conversion of assistance under RAD • PHAs must adhere to notification requirements (described in Paragraph 8 of this Notice): generally, a minimum of 30 days for residents to be temporarily relocated for up to a year, and 90 days for permanent relocation • PHAs seeking to move residents prior to closing must receive prior approval from HUD as described in Paragraph 9 of this Notice

5. Resident Right to Return

RAD program rules prohibit the permanent involuntary relocation of residents as a result of conversion. Residents that are temporarily relocated retain the right to return to the project once it has been completed and is in decent, safe, and sanitary conditions.⁷ The period during which residents may need to be temporarily relocated is determined by the period of rehabilitation or construction, which will be specific to each project.

If proposed plans for a project would preclude a resident from returning to the RAD project, the resident must be given an opportunity to comment and/or object to such plans. If the resident objects to such plans, the PHA must alter the project plans to accommodate the resident in the converted project. If a resident agrees to such plans, the PHA must secure informed, written consent from the resident to receive permanent relocation assistance and payments consistent with URA and acknowledge that acceptance of such assistance terminates the resident’s right to return to the project. In obtaining this consent, PHAs must inform residents of their right to return, potential relocation, and temporary and permanent housing options at least 30 days before residents must make a decision. The PHA cannot employ any tactics to pressure residents into

⁷ Where the transfer of assistance to a new site is approved, residents of the converting project will have the right to reside in an assisted unit at the new site once rehabilitation or new construction is complete.

relinquishing their right to return or accepting permanent relocation assistance and payments.⁸ A PHA may not terminate a resident's lease if it fails to obtain this consent.

PHAs must keep documentation of such information provided to residents and such consent by residents. While HUD does not require PHAs to submit documentation of obtaining this consent, PHAs and participants must properly brief residents on their housing and relocation options and must keep auditable written records of such consultation and decisions. HUD may request this documentation during a review of the FHEO Relocation and Accessibility Checklist or if relocation concerns arise.

Examples of project plans that may preclude a resident from returning to the converted RAD project include, but are not limited to:

- Changes in bedroom distribution (i.e. when larger units will be replaced with smaller units such that current residents would become under-housed or when smaller units will be replaced with larger units such that current residents would become over-housed);
- Where a PHA is reducing the number of assisted units at a property by a de minimis amount⁹, but those units are occupied by assisted residents; or
- The reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to facilitate social service delivery.

In all scenarios where residents voluntarily accept permanent relocation to accommodate project plans, these residents are eligible for permanent relocation assistance and payments under URA. If a resident accepts permanent relocation assistance, the resident surrenders his or her right to return to the completed project.

6. Relocation Assistance

Under RAD, relocation assistance may vary depending on the length of time relocation is required.¹⁰

- a. In instances when the PHA anticipates that a resident will be relocated for more than a year, the PHA must offer the resident the choice of:
 - Permanent relocation assistance and payments at URA levels; or
 - Temporary relocation assistance, including temporary housing, while the resident retains his or her right to return and reimbursement for all reasonable out-of-pocket expenses associated with the temporary relocation.

⁸ Persons with disabilities returning to the RAD project may not be turned away or placed on a waiting list due to a lack of accessible units. Their accessibility needs must be accommodated.

⁹ A reduction in total number of assisted units at RAD project of 5% or less. (Section 1.5.B of PIH 2012-32 REV-1)

¹⁰ Some residents may not qualify for relocation assistance under URA. A nonexclusive listing of persons who do not qualify as displaced persons under URA is at 49 CFR 24.2(a)(9)(ii). See also, Paragraph 1-4(J) of HUD Handbook 1378.

The PHA must give the resident no less than 30 days to decide between permanent and temporary relocation assistance. If the resident elects to permanently relocate with assistance at URA levels, the PHA must inform the resident that his or her acceptance of permanent relocation assistance terminates the resident's right to return to the completed RAD project.

- b. In instances when a resident elects temporary relocation assistance and reoccupies a unit in the completed project within one year, the resident need not be offered permanent relocation assistance pursuant to URA.

Great care must be exercised to ensure that residents are treated fairly and equitably. If a resident is required to relocate temporarily in connection with the project, his or her temporarily occupied housing must be decent, safe, and sanitary and the resident must be reimbursed for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation. These expenses include, but are not limited to, moving expenses and increased housing costs during the temporary relocation.

- c. In the event that a resident elects to receive temporary relocation assistance and the temporary relocation exceeds one year, the resident becomes eligible for all permanent relocation assistance and payments under URA. (This assistance would be in addition to any assistance the person has already received for temporary relocation, and may not be reduced by the amount of any temporary relocation assistance.) In such event, the PHA shall give the resident the opportunity to choose to remain temporarily relocated for an agreed-to period (based on new information about when they can return to the completed RAD unit), or choose to permanently relocate with URA assistance.

PHAs may not propose or request that a displaced person waive rights or entitlements to relocation assistance under the URA. If the resident elects to permanently relocate with URA assistance, the PHA must inform the person that the person's acceptance of URA relocation assistance to permanently relocate will terminate the person's right to return to the completed RAD project. Conversely, unless and until the resident elects to be permanently relocated, the resident may remain temporarily relocated with a right to return to the completed project.

7. Initiation of Negotiations (ION) Date

Eligibility for URA relocation assistance is generally effective on the date of initiation of negotiations (ION) (49 CFR 24.2(a)(15)). For RAD projects, the ION date is the date of the issuance of the RAD Conversion Commitment (RCC).

8. Resident Notification

When a project converting under RAD will include relocation of residents, notice must be provided to those resident households. For each notice listed below, one notice shall be given to each resident household. The purpose of these notifications is to ensure that residents are

informed of their potential rights and the relocation assistance available to them. During initial meetings with residents about RAD and in subsequent communications with residents related to relocation, the PHA should inform residents that if they choose to move after receiving a written GIN, but prior to receiving a RAD Notice of Relocation, they may jeopardize their eligibility for relocation assistance. However, PHAs should note that a resident move undertaken as a direct result of the project may still require relocation assistance and the resident may be eligible to receive permanent relocation assistance under the URA even though the PHA has not yet issued notices.

a. *General Information Notice* (49 CFR 24.203(a) & Handbook 1378, Paragraph 2-3(B))

As soon as feasible in the planning process, the PHA must provide each resident with a written GIN (see sample in Appendix 2) to provide a general description of the project, the activities planned, and the relocation assistance that may become available. URA regulations state that the GIN should be provided *as soon as feasible*. Under RAD, PHAs must provide GINs during the initial RAD resident meetings, before submitting a RAD application. GINs must do at least the following:

- Inform the resident that he or she may be displaced for the project and generally describe the relocation payment(s) for which the resident may be eligible, the basic conditions of eligibility, and the procedures for obtaining the payment(s);
- Inform the resident that he or she will be given reasonable relocation advisory services, including referrals to replacement properties, help in filing payment claims, and other necessary assistance to help the resident successfully relocate;
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she will not be required to move without at least 90 days advance written notice, and inform any person to be displaced from a dwelling that he or she cannot be required to move permanently unless at least one comparable replacement dwelling has been made available;
- Inform the resident that any person who is an alien not lawfully present in the United States is ineligible for relocation advisory services and relocation payments, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child (see 49 CFR 24.208(h) for additional information); and
- Describe the resident's right to appeal the PHA's determination as to a person's eligibility for URA assistance.

b. *RAD Notice of Relocation*

If a resident will be relocated to facilitate the RAD conversion, the PHA shall provide notice of such relocation (RAD Notice of Relocation). The PHA shall issue this notice upon the PHA's receipt of the RCC from HUD, which is the ION date.

If residents will not be relocated, notice of relocation is not required, but the PHA should

notify them that they are not being relocated.¹¹

The RAD Notice of Relocation must conform to the following requirements:

- The notice must state the anticipated duration of the resident’s relocation.
- PHAs must provide this notice a minimum of 30 days prior to relocation to residents who will be temporarily relocated.¹² Longer notice may be appropriate for persons who will be relocated for an extended period of time (over 6 months), or if necessary due to personal needs or circumstances.
- Residents whose temporary relocation is anticipated to exceed one year must be informed that they will have no less than 30 days to elect temporary or permanent relocation as described in Section 6 of this Notice. When timing is critical for project completion, the 30-day decision period can run concurrently with the 30-day notice period for temporary relocation and with the 90-day period for permanent relocation if the PHA makes available comparable replacement dwellings consistent with 24.204(a).
- Residents who will be permanently relocated must receive written notice a minimum of 90 days prior to relocation. This 90-day time period may only begin once the PHA has made available at least one comparable replacement dwelling consistent with 49 CFR 24.204(a).¹³
- The notice must describe the available relocation assistance, the estimated amount of assistance based on the individual circumstances and needs, and the procedures for obtaining the assistance. The notice must be specific to the resident and his or her situation so that the resident will have a clear understanding of the type and amount of payments and/or other assistance the resident household may be entitled to claim.
- The notice must explain the reasonable terms and conditions under which the resident may continue to lease and occupy a unit in the completed project.
- The notice must state that the PHA will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with any temporary move. These expenses include, but are not limited to, moving expenses and increased housing costs (rent, utilities, etc.).

c. *Notice of Intent to Acquire* (49 CFR 24.203(d))

¹¹ HUD policy generally requires a “notice of non-displacement” in certain instances; the RAD program does not require this notice. Although the scope of this notice is limited to guidance for projects requiring relocation, PHAs should note, however, that there may be notification requirements for projects that do not involve relocation. The RAD conversion will terminate the resident’s public housing lease and commence a PBV or PBRA lease, even when there is no relocation required. In such instances, state law may impose certain notification requirements. In addition, public housing regulations generally require 30 days’ notice prior to lease termination. PHAs are encouraged to review public housing requirements set forth in 24 CFR parts 5 and 966.

¹² HUD may approve shorter notice periods based on an urgent need due to danger, health, or safety issues or if the person will be temporarily relocated for only a short period.

¹³ PHAs should note that URA regulations also require, where possible, that three or more comparable replacement dwellings be made available before a resident is required to move from his or her unit.

For RAD projects involving acquisition, residents may be provided with a notice of intent to acquire (“*Notice of Intent to Acquire*”) prior to the ION date with HUD’s prior approval. Once the Notice of Intent to Acquire is provided, a resident’s eligibility for relocation assistance and payments is established. Therefore, the RAD Notice of Relocation must be provided in conjunction with or after the Notice of Intent to Acquire. A RAD Notice of Relocation would not otherwise be sent prior to the ION date.

Since residents who accept permanent relocation must receive 90 days advanced written notice prior to being required to move, providing residents the Notice of Intent to Acquire and RAD Notice of Relocation prior to the ION date may be necessary to provide sufficient notice of relocation to a resident in instances where there may not be 90 days between the issuance of the RCC (ION date) and the anticipated closing date. This allows the PHA to issue the notice earlier so that relocation may begin upon closing. This allows program participants to conduct orderly relocation upon closing, minimize adverse impacts on displaced persons, and to expedite project advancement and completion.¹⁴

- d. *URA Notice of Relocation Eligibility – for residents whose temporary relocation exceeds one year* (49 CFR 24.203(b) & Handbook 1378, Paragraph 2-3(C))

After a resident has been temporarily relocated for one year, the PHA must provide a notice of relocation eligibility in accordance with URA requirements (“*Notice of Relocation Eligibility*”). This notice is not required if the resident has already accepted permanent relocation assistance.

The Notice of Relocation Eligibility must conform to URA requirements as set forth in 49 CFR Part 24, to HUD Handbook 1378 and to the following requirements:

- The PHA must provide updated information as to when it is anticipated that the resident will be able to return to the completed project.
- The resident may choose to remain temporarily relocated based upon such updated information or may choose to accept permanent URA relocation assistance in lieu of exercising the right to return.
- If the resident chooses to accept permanent URA relocation assistance and such assistance requires that the resident move, the URA requires such resident to receive 90 days advance written notice of the earliest date they will be required to move (i.e., 90-Day Notice, 49 CFR 24.203(c)). The PHA should be mindful that the 90-day time period may only begin once the PHA has made available at least one “comparable replacement dwellings” as set forth in 49 CFR 24.204(a).

9. Initiation of Relocation

¹⁴ PHAs and program participants should note that, in most instances, it will be most appropriate for the acquiring entity to send this notice.

Unless otherwise approved by HUD, relocation may not begin until the date of closing of the RAD transaction and recordation of the RAD Use Agreement. PHAs must provide residents being temporarily relocated at least 30 days advance written notice of the required move. PHAs must give residents being permanently relocated at least 90 days advance written notice of the required move. This means PHAs are advised to plan carefully to account for this 30-day or 90-day notice period to ensure the closing is not delayed.

However, HUD is aware that, in rare cases, some project plans necessitate relocation prior to closing. With prior HUD approval, for projects involving acquisition, PHAs may relocate residents prior to the closing date subject to public housing requirements (see 24 CFR part 5 and 24 CFR 966). PHAs must contact their assigned RAD transaction manager (TM) to discuss plans as early as possible in the process to ensure compliance with all RAD and URA requirements.

If relocation prior to closing is desired, PHAs should submit to the TM the following information, as early as possible in the process:

- A written request for relocation prior to closing. The request must include justification of why the early relocation is necessary for the viability of the RAD transaction. Justification may include the presence of outside financing, such as Low Income Housing Tax Credit (LIHTC) awards, if the PHA can show that early relocation is necessary to meet critical LIHTC deadlines.
- FHEO Accessibility and Relocation Checklist.
- Evidence of intent to comply with public housing requirements, as applicable. Generally, public housing regulations require public housing residents to receive 30 days' notice prior to relocation and that such notice either be published in the PHA's admissions and continued occupancy policies (ACOP) or published elsewhere at least 30 days prior to receipt of such notice (24 CFR parts 5 and 966).

When seeking to relocate residents prior to closing, submission of this request as early as possible is preferred, prior to the 180-day Financing Plan milestone if possible (with Financing Plan submission following the request).

HUD reserves the right to request additional follow-up information, including a Relocation Plan and related budget, prior to approving such requests. PHAs must receive written HUD approval before beginning relocation of residents prior to closing.

Early planning and submission of the Financing Plan and FHEO checklist to HUD will ensure the PHA has built in the 30- or 90-day notice period prior to initiating relocation.

10. Fair Housing and Civil Rights Requirements

PHAs must comply with all applicable fair housing and civil rights laws, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973, when conducting relocation planning and providing relocation assistance. Further, communication must be provided in a manner that is effective for persons

with disabilities (24 CFR 8.6) and for person who are Limited English Proficient (see 72 FR 2732). This section discusses some of the PHA's obligations under these laws and regulations. However, the applicability of civil rights laws is not limited to the activities discussed in this section. PHAs conducting relocation activities should familiarize themselves with applicable civil rights statutes, regulations, and guidance, including but not limited to, those listed at the end of this section.

- **Effective Communication for Persons with Disabilities:** Communications and materials must be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 CFR 8.6), and as applicable, the Americans with Disabilities Act; and for persons who are limited English proficient (*see* 72 Fed Reg 2732). This includes ensuring that training materials are in appropriate alternative formats as needed, e.g., Braille, audio, large type, assistive listening devices, and sign language interpreters.
- **Accessible Meeting Facilities for Persons with Disabilities:** When holding public meetings, PHAs must give priority to methods that provide physical access to individuals with disabilities, i.e., holding the meetings, workshops, and briefings or any other type of meeting in an accessible location, in accordance with the regulations implementing Section 504 of the Rehabilitation Act of 1973 and Titles II and III of the Americans with Disabilities Act of 1990, as applicable. All programs and activities must be held in accessible locations unless doing so would result in an undue financial and administrative burden, in which case the PHA must take any action that would not result in such an alteration or such burden but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity, e.g., briefings at an alternate accessible, in-home briefing. Individuals with disabilities must receive services in the most integrated setting appropriate to their needs. The most integrated setting appropriate to the needs of qualified individuals with disabilities is a setting that enables individuals with disabilities to interact with nondisabled person to the fullest extent possible (28 CFR part 35, appendix B).
- **Meaningful Access for Persons with Limited English Proficiency (LEP):** PHAs must provide meaningful access to programs and activities for persons who have a limited ability to read, speak, or understand English. Any person with LEP who will be temporarily relocated or permanently displaced must have meaningful access to any public meetings regarding the project. In addition, any information provided to residents including, but not limited to, any notices required under the URA, should be provided in the appropriate language to persons with LEP. Generally, PHAs will be responsible for providing oral interpreters at meetings, including ensuring their competence, and covering any associated translation and interpretation costs.
- URA requires that PHAs provide persons who are unable to read or understand the notices, such as persons with disabilities or persons with LEP, with appropriate translation and counseling to ensure that they understand their rights and responsibilities and the assistance available to them (49 CFR 24.5). URA also requires that each notice indicate the name and telephone number of a person to contact with questions or for other

needed help (49 CFR 24.5). This notice should include the number for the telecommunication device for the deaf (TDD) or other appropriate communication device, if applicable (24 CFR 8.6(a)(2)).

- **Comparable Housing for Persons with Disabilities:** PHAs should identify the accessibility needs of residents to be relocated by consulting existing information (e.g., tenant characteristics forms, including identification of the need for accessible unit features; records of approved reasonable accommodations, and records of the presence of accessible unit features). For guidance on providing relocation assistance to persons with disabilities, see Exhibit 3-1 in HUD Handbook 1378.
- **Advisory Services:** PHAs should determine the advisory services that will be necessary to ensure a successful relocation program consistent with 49 CFR 24.205(c). Such advisory services may include housing counseling that should be facilitated to ensure that residents affected by the project understand their rights and responsibilities and the assistance available to them (49 CFR 24.205(c)). Advisory counseling must also inform residents of their fair housing rights and be carried out in a manner that satisfies the requirements of Title VI of the Civil Rights Act of 1964, the Fair Housing Act, and Executive Order 11063 (49 CFR 24.205(c)(1)). In addition, PHAs should inform residents that if they believe they have experienced unlawful discrimination, they may contact HUD at 1-800-669-9777 (Voice) or 1-800-927-9275 (TDD) or at <http://www.hud.gov>.

Fair Housing References:

- Section 504 of the Rehabilitation Act of 1973
- Regulations: 24 CFR part 8
- Fair Housing Act Regulations: 24 CFR part 100
- Title VI of the Civil Rights Act of 1964
- Regulations: 24 CFR part 1
- Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (LEP Guidance) (72 FR 2732)
- Exhibit 3-1 Compliance with Section 504 of the Rehabilitation Act in HUD Handbook 1378 (Tenant Assistance Relocation and Real Property Acquisition)

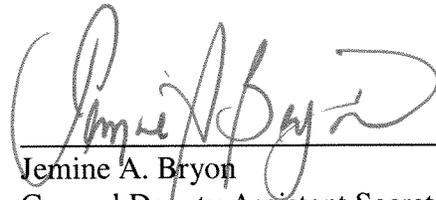
11. Other Requirements

a. Public Housing Program Compliance

PHAs should note that public housing resident provisions related to occupancy and termination, including grievances and related hearings, will remain in effect until the execution of the new PBV or PBRA Housing Assistance Payment (HAP) contract.

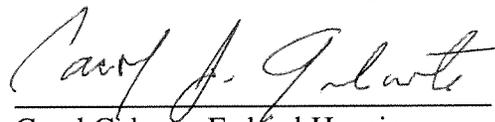
b. Evictions for Cause

If the PHA determines that a resident was evicted in accordance with applicable state and local law for serious or repeated violation of material terms of the lease, and the eviction was not undertaken for the purpose of evading the obligation to make available URA payments and other assistance, the resident is not entitled to relocation payments and assistance under the URA (49 CFR 24.206).



Jermaine A. Bryon

General Deputy Assistant Secretary for
Public and Indian Housing



Carol Galante, Federal Housing
Commissioner – Assistant Secretary for
Housing

APPENDICES

Appendix 1

Recommended Relocation Plan Contents

Appendix 2

Sample RAD General Information Notice (GIN)

Appendix 3

Sample RAD Notice of Relocation (for relocation anticipated for a year or less)

Appendix 4

Sample RAD Notice of Relocation (for relocation anticipated for more than a year)

Appendix 5

Sample Notice of Eligibility for URA Relocation Assistance (for residents who have been temporarily relocated for more than a year)

Appendix 1: RECOMMENDED RELOCATION PLAN CONTENTS

While written Relocation Plans are not required under RAD or URA, the Department strongly encourages PHAs to document their relocation planning process and procedures in a written Relocation Plan. The following provides suggested content for Relocation Plans.

I. Project Summary

The Relocation Plan should provide a general description of and purpose for the project (e.g., year built, location, number of units, configuration, occupancy information, and funding sources).

The basic components of a plan include:

- A general description of the project and the site, including acquisition, demolition, rehabilitation, and construction activities and funding sources;
- A detailed discussion of the specific steps to be taken to minimize the adverse impacts of relocation, including when transferring the assistance to a new site;
- Information on occupancy (including the number of residents, residential owner-occupants and non-residential occupants, if any, to be permanently or temporarily relocated);
- Information on relocation needs and costs (including the number of residents who plan to relocate with Section 8 assistance);
- General moving assistance information;
- Temporary move assistance (including information on the duration of temporary moves);
- Permanent move assistance; and
- Appeals process.

II. Resident Return and Re-occupancy Policies

For residents that will be temporarily relocated, the plan should include the criteria that will be used to determine the priority for residents to re-occupy units at the project after rehabilitation, demolition, and/or construction is completed. For example, if units will come online in stages, the plan should outline how the PHA will determine when each resident will return to the project. PHAs should ensure that any written return or re-occupancy policy is compliant with related RAD requirements, such as the right-to-return policy and the “no re-screening upon conversion” policy, as described in the RAD Notice.

III. Summary of Moving Costs

The plan should include a summary of moving costs, identified by move types, including the following:

Temporary Moves

- Number of and cost amount for two-way moves (i.e., a move to another unit and then a return move) within the same building/complex.
- Number of and cost amount for two-way moves to a unit not in the same building/complex, carried out by the PHA.
- Number of and cost amount for two-way moves to a unit not in the same building/complex not carried out by the PHA.

Permanent Moves

- Number of and cost amount for one-time moves into another unit in the same building/complex.¹⁵
- Number of and cost amount for one permanent move to a unit not within the same building/complex, carried out by the PHA.
PHAs should note that if a residential move is carried out by the PHA at no cost to the resident, this per-household estimate must include the required dislocation allowance (currently \$100). The URA Fixed Residential Moving Cost Schedule lists the most current dislocation allowance:
http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm
- Number of and cost amount for one permanent move to a unit not within the same building/complex that is not carried out by the PHA.

IV. Temporary Relocation Assistance

The PHA will assist residents who are required to move temporarily. At the Initiation of Negotiations (ION), the PHA will send a RAD Notice of Relocation to residents who will be relocated. Appendices 3 and 4 of this Notice contain sample RAD Notices of Relocation to be provided to residents that will be temporarily relocated.

The plan should detail the temporary relocation assistance the PHA will provide for residents (Paragraph 2-7 of HUD Handbook 1378). This assistance includes:

- Temporary Housing - The PHA will provide temporary housing that is decent, safe, and sanitary on a nondiscriminatory basis for residents who are relocated temporarily. The PHA will also pay for reasonable increased housing costs that the resident incurs in connection with the temporary relocation.

NOTE: If a resident's relocation exceeds one year, the PHA must then issue a *Notice of Relocation Eligibility* (49 CFR 24.203(b)) to the resident and offer the resident permanent

¹⁵ A resident who moved to another unit in the same building/complex may be considered a displaced person under URA if the resident moves from the building/complex permanently and was not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move within the same building/complex and/or if other conditions of the move within the building/complex were not reasonable.

relocation assistance and payments at URA levels. The PHA must provide this notice to affected residents as soon as the temporary relocation exceeds one year.

- Packing and Moving Assistance - Since most residents prefer to pack their own personal possessions and items of value, they should be provided packing instructions, boxes, markers, and tape for the move. If assistance in packing is needed, the PHA should provide the resident with information on how to request this assistance. The PHA is responsible for covering all reasonable moving expenses incurred in connection with temporarily relocating a resident. The PHA may reimburse the resident's out-of-pocket moving expenses and/or directly carry out the move.
- Payment for Temporary Relocation Moving Expenses - The plan should also indicate how the PHA intends to provide or reimburse for moving services and expenses. The PHA can choose to do one or more of the following:
 - Undertake the moves itself, using force account labor or a moving company;
 - Use PHA's contractor or moving company;
 - Carry out moves with employees of the PHA;
 - Reimburse residents for all actual and reasonable moving costs.

NOTE: The PHA will not make fixed payments since such payments may not be representative of actual reasonable costs incurred. However, in order for a resident to be sure of full reimbursement, the resident should submit a moving cost estimate to the PHA for approval prior to the move unless the PHA is directly carrying out the move and the resident will not incur any reasonable out-of-pocket moving expenses. Failure to do so may result in the resident not being fully reimbursed.

- Utility Costs - The PHA is responsible for covering the expenses relating to disconnection and reconnection of necessary utilities. If the resident has telephone, cable service or Internet access, the PHA is responsible for covering the expenses involved in transferring existing service. The PHA may also pay utility deposits, if required at the temporary relocation housing (HUD Handbook 1378, paragraph 2-7(A)(3)). If a resident is temporarily relocating from a public housing unit to a non-public housing unit, the resident must be reimbursed for reasonable increases in utility costs even if the PHA utility allowance is lower than the actual costs to the resident.

V. Permanent Relocation Assistance

Based on the local housing resources available, the PHA should identify the replacement housing options that will be available to meet the housing needs of residents to be permanently relocated. Replacement housing options for residents that meet the definition of a "displaced person" (49 CFR 24.2(a)(9)) under the URA include, but are not limited to:

- Other Public Housing;
- Section 8 Project-Based Voucher unit;
- Section 8 Housing Choice Voucher unit;
- Homeownership housing;

- Private-market rental housing (affordable, non-subsidized).¹⁶

The plan should describe each type of replacement housing projected to be available, including:

1. Number of units, by bedroom size, expected to be available, and discussion of whether available units will meet dwelling requirements of relocated residents;
2. General area or location of unit(s);
3. Criteria for receiving relocation assistance; and
4. Any other information that might benefit residents in their consideration of housing choices.

The plan should include a description of the permanent relocation assistance the PHA will provide to residents. This assistance includes:

- Availability of Comparable Replacement Housing – Under URA, no displaced resident will be required to move unless at least one comparable replacement dwelling (49 CFR 24.2(a)(6)) is made available at least 90 days before the required move (49 CFR 24.203(c)). Comparable replacement dwellings must contain the accessibility features needed by displaced persons with disabilities (49 CFR 24.2(a)(8)(vii); 49 CFR part 24, Appendix A, §24.2(a)(8)(vii)). If the comparable replacement dwelling is not subsidized housing, the PHA should contact the RAD staff for advice on replacement housing payment requirements.
- Referral to Housing Not Located in an Area of Minority Concentration - Whenever possible, minority persons shall be given reasonable opportunities to relocate to decent, safe, and sanitary replacement dwellings that are within their financial means and not located in areas of minority concentration (49 CFR 24.205(c)(2)(ii)(D)). However, this policy does not require a PHA to provide a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling unit.
- Permanent Relocation Moving Expenses from Public Housing to Public Housing - The PHA may choose one of the following options for covering the expenses involved in moving public housing residents that are relocated into other public housing:
 - Undertake the move itself, using force account labor or a moving company. Residents should incur no moving costs under this option, but if such expenses are incurred, the PHA is responsible for reimbursing the resident for any such actual and reasonable expenses. In such case, the resident is also entitled to a dislocation allowance (currently \$100). The URA Fixed Residential Moving Cost Schedule lists the current dislocation allowance and is available at: http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm

¹⁶ Every effort should be made to find another subsidized unit as replacement housing for a resident relocating from subsidized housing so that the resident will continue receiving the housing subsidy as long as it is needed.

NOTE: Residents who prefer to pack their own personal possessions and items of value may be provided packing instructions, boxes, markers, and tape for their move. If a resident needs assistance in packing, they should contact the PHA. It is the responsibility of the PHA to pack and move all of their belongings and household goods, if so desired.

- Allow the resident to elect one of the following choices:
 - 1) The PHA will reimburse the resident for the cost of all actual reasonable and necessary moving and related expenses (49 CFR 24.301), such as:
 - Transportation of the resident and personal property. This may include reimbursement at the current mileage rate for personally owned vehicles that need to be moved. Transportation costs for a distance beyond 50 miles are not eligible, unless the PHA determines that relocation beyond 50 miles is justified.
 - Packing, crating, uncrating, and unpacking of personal property.
 - Storage of personal property for a period not to exceed 12 months, unless the PHA determines that a longer period is necessary.
 - Disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property.
 - Insurance for the replacement value of the property in connection with the move and necessary storage.
 - The replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
 - 2) The PHA will pay directly to the resident the applicable and current fixed moving cost payment according to the URA Fixed Residential Moving Cost Schedule (49 CFR 24.302), available at:
http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm
- Permanent Relocation Moving Expenses for All Other Moves – Under URA, residents who are permanently displaced, except for those residents displaced from public housing and moving to other public housing, are entitled to the assistance described in the brochure *Relocation Assistance To Residents Displaced From Their Homes*, available in English at http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_16280.doc and in Spanish at http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_16281.doc. Residents may choose moving assistance from one of the following two options.
 - 1) The PHA will reimburse the resident for the cost of all actual reasonable moving and related expenses (49 CFR 24.301).
 - 2) The PHA will pay directly to the resident the applicable and current fixed moving cost payment according to the URA Fixed Residential Moving Cost Schedule (49

CFR 24.302), available at:

http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm.

- Replacement Housing Payment - In addition to covering moving expenses, displaced residents may be entitled to a replacement housing payment (RHP). This payment is intended to cover the increase, if any, in monthly housing costs for a 42-month period.

When calculating the RHP, the PHA must consider the comparable replacement housing unit offered to the resident. Since the PHA is not required to pay an RHP amount that exceeds the amount of RHP calculated for the offered comparable replacement dwelling, residents are cautioned to work closely with the PHA prior to their move.

- Accessible Housing for Persons with Disabilities - Under the URA, persons with disabilities who will be permanently displaced must be relocated to a replacement dwelling that contains the accessibility features they need (49 CFR 24.2(a)(8)(vii); 49 CFR Appendix A, 24.2(a)(8)(vii)). A person with disabilities who has been relocated must be offered a comparable replacement dwelling unit that contains accessible features comparable to the housing from which the tenant has been displaced or relocated. This is so even if the tenant has paid for the acquisition and/or installation of accessible features in the housing from which he or she has been relocated; in such instances, the recipient must ensure that the replacement housing contains comparable accessible features or provide relocation assistance to the tenant in an amount that covers the cost of acquiring and/or installing comparable accessible features. Under the URA, an agency may use project funds to remove architectural barriers for displaced owners and tenants with disabilities or take other last resort housing measures if comparable replacement dwelling units are not available within the monetary limits prescribed under the URA regulations (49 CFR 24.404(c)(vii); HUD Handbook 1378, Paragraph 3-8).

VI. Relocation Budget

Based on the results of the planning process, the PHA should create a relocation budget that includes the following six components:

- 1) The cost of administering the plan and providing assistance and counseling.
- 2) Reasonable moving expenses for a person with disabilities, which may include the cost of moving assistive equipment that is the personal property of the residents, the furnishings and personal belonging of a live-in aide, and/or other reasonable accommodations (HUD Handbook 1378, Paragraph 3-2).
- 3) The cost of the physical move of the residents' belongings. (It is suggested that the move costs be broken down by average cost per move type multiplied by the number of moves.)

NOTE: This physical move cost total should be based on the move scenarios anticipated

or projected by the resident survey.

- 4) The cost estimated to pay for projected increases in monthly housing costs for temporary relocation.
- 5) The cost estimated to pay for the replacement housing payment (RHP) (42-month period for URA or 60-month period if section 104(d) applies).
- 6) Contingency costs estimated for carrying out the relocation process necessary to complete the proposed project. (The PHA should state where these costs are indicated in the application, or attach any other information required by HUD, to support these costs.)

VII. Appeal Process

If a resident disagrees with the PHA's decision as to the resident's eligibility to receive relocation assistance, the amount of a relocation payment, or the adequacy of a comparable replacement dwelling offered to a resident, the resident may file a written appeal to the PHA. The Relocation Plan should describe the specific appeal procedures to be followed consistent with 49 CFR 24.10 (and 24 CFR 42.390 if section 104(d) is involved). At a minimum, the resident will have 60 days to file an appeal with the PHA after receiving written notification of a claim or ineligibility determination.

VIII. Certification

The plan should contain a certification of compliance with the URA and, if applicable, section 104(d).

Technical Assistance

The PHA should direct questions on this Notice's relocation assistance requirements to their RAD Transaction Manager or email rad@hud.gov.

Appendix 2: SAMPLE RAD GENERAL INFORMATION NOTICE (GIN)

PHA LETTERHEAD

RENTAL ASSISTANCE DEMONSTRATION (RAD) GENERAL INFORMATION NOTICE (GIN)

[Date]

Dear [Resident Name],

The property you currently occupy is being proposed for participation in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. At this time, we expect that [the proposed acquisition, rehabilitation or demolition, may require you to be relocated (temporarily or permanently) from your unit]. We will provide further details to you as plans develop. **This notice does not mean that you need to leave the property at this time. This is not a notice of eligibility for relocation assistance.** The remainder of this letter only applies to situations where you will need to be relocated from your unit.

This notice serves to inform you of your potential rights under the RAD program and a federal law known as the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). If the proposed RAD project receives HUD approval and if you are displaced permanently as a result, you may become eligible for relocation assistance and payments under the URA, including:

- 1) Relocation advisory services that include referrals to replacement properties, help in filing payment claims and other necessary assistance to help you successfully relocate;
- 2) At least 90 days' advance written notice of the date you will be required to move;
- 3) Payment for moving expenses; and
- 4) Payments to enable you to rent a similar replacement home.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an immigrant lawfully present in the United States.

As a resident of a property participating in RAD, you have the right to return to the project after the project is complete. You will be able to lease and occupy a unit in the converted project when rehabilitation is complete.

If you are permanently displaced from your home, you will not be required to move until you are given at least 90-day advance written notice of any required move and at least one comparable replacement dwelling has been made available to you. If you are temporarily relocated and your temporary relocation lasts more than one year, you will be contacted and offered permanent relocation assistance as a displaced person under the URA. This assistance would be in addition

to any assistance you may receive in connection with temporary relocation and will not be reduced by the amount of any temporary relocation assistance you have already received.

If you are required to relocate from the property in the future, you will be informed in writing. [PHA] will inform you of what assistance and payments you are eligible for if you will be relocated because of RAD and how you will receive these payments. If you become a displaced person, you will be provided reasonable assistance necessary to complete and file any required claim to receive a relocation payment. If you feel that your eligibility for assistance is not properly considered, you will also have the right to appeal a determination on your eligibility for relocation assistance.

You should continue to pay your rent and meet any other requirements specified in your lease. If you fail to do so, [PHA] may have cause for your eviction. If you choose to move, or if you are evicted, prior to receiving a formal notice of relocation eligibility, you may become ineligible to receive relocation assistance. It is very important for you to contact us before making any moving plans.

You will be contacted soon so that we can provide you with more information about the proposed project. If the project is approved, we will make every effort to accommodate your needs. In the meantime, if you have any questions about our plans, please contact: [Name, Title, Address, Phone, Email Address]. This letter is important to you and should be retained.

Sincerely,

[Name]

[Title]

NOTES:

1. Files must indicate how this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378)
2. This is a sample GIN. PHAs should revise it to reflect project-specific circumstances.
3. PHAs may provide residents with HUD brochure “Relocation Assistance To Residents Displaced From Their Homes” available at:
<http://www.hud.gov/offices/cpd/library/relocation/publications/1042.pdf>.

Appendix 3: SAMPLE RAD NOTICE OF RELOCATION (For relocation anticipated for a year or less)

***THIS IS A GUIDE FORM.
REVISE TO REFLECT THE PROJECT-SPECIFIC CIRCUMSTANCES.***

PHA Letterhead

(date)

Dear [*Resident Name*],

The property you currently occupy is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. On [*date*], the [*Public Housing Authority*] (PHA) notified you of proposed plans to [acquire/ rehabilitate/demolish] the property you currently occupy at [*address*]. On [*date*], HUD issued the RAD Conversion Commitment (RCC) and committed federal financial assistance to the project. [*In instances where a Notice of Intent to Acquire is applicable and this notice is being sent before the RCC is issued, in lieu of the previous sentence noting the RCC issuance date, insert: [Name of entity acquiring the property] (Displacing Agency) intends to acquire the property you currently occupy. This is a Notice of Intent to Acquire.*]

In order for PHA to complete the project, you will need to be relocated for [*anticipated duration of relocation*]. Upon completion of the project, you will be able to lease and occupy your present unit or another decent, safe and sanitary unit in the completed project under reasonable terms and conditions. You are eligible for relocation payments and assistance.

However, **you do not need to move now**. This notice informs you that a decent, safe, and sanitary dwelling unit, listed below, has been made available to you and you will be required to move by [*insert date at least 30 days after the date of this notice*].

If your temporary relocation exceeds one year and you qualify as a "displaced person" under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), you may be eligible for further relocation assistance and payments under URA.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

The relocation assistance to which you are entitled includes:

- **Payment for Moving Expenses**. You are entitled to be reimbursed for all reasonable out-of-pocket expenses incurred in connection with any temporary

move. *[PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 4 of this Notice.]*

- The location of your temporary replacement unit is *[address]*. This temporary housing has been determined to be decent, safe and sanitary.
- *[List appropriate relocation advisory services and any other services and assistance provided.]*

If you disagree with this determination, you may file a written appeal to the PHA in accordance with 49 CFR 24.10.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact *[Name, Title, Address, Phone, Email Address]* before you make any moving plans. He/she will assist you with your move to a temporary unit and help ensure that you preserve your eligibility for any relocation payments to which you may be entitled.

Remember, do not move or commit to the purchase or lease of a replacement home before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

Print name:

Title:

NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)

Appendix 4: SAMPLE RAD NOTICE OF RELOCATION (For relocation anticipated for more than a year)

***THIS IS A GUIDE FORM.
REVISE TO REFLECT THE PROJECT-SPECIFIC CIRCUMSTANCES.***

PHA Letterhead

(date)

Dear [*Resident Name*],

The property you currently occupy is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. On [*date*], the [*Public Housing Authority*] (PHA), notified you of proposed plans to [*acquire/ rehabilitate/demolish*] the property you currently occupy at [*address*]. On [*date*], HUD issued the RAD Conversion Commitment (RCC) and committed federal financial assistance to the project. [*In instances where a Notice of Intent to Acquire is applicable and this notice is being sent before the RCC is issued, in lieu of the previous sentence noting the RCC issuance date, insert: [Name of entity acquiring the property] (Displacing Agency) intends to acquire the property you currently occupy. This is a Notice of Intent to Acquire.*]

In order for PHA to complete the project, you will need to be relocated for [*anticipated duration of relocation*]. Upon completion of the project, you will be able to lease and occupy your present unit or another decent, safe and sanitary unit in the completed project under reasonable terms and conditions. You are eligible for relocation assistance and payments. Because we expect your relocation to exceed one year, you have the choice to either:

- Receive temporary relocation assistance and return to a unit in the RAD project once it is complete; or
- Receive permanent relocation assistance and payments consistent with the URA instead of returning to the completed RAD project.

You must inform us of your choice within 30 days.

However, **you do not need to move now**. If you choose temporary relocation assistance, you will not be required to move sooner than 30 days after you receive notice that a temporary unit is available for you. If you choose permanent relocation assistance, you will not be required to move sooner than 90 days after you receive written notice that at least one comparable replacement unit is available to you in accordance with 49 CFR 24.204(a). [*Note to PHA: These time periods may start running as of the date of this Notice if the notice of relocation includes such information on the temporary and/or comparable replacement dwelling options, as applicable. In such circumstance, add applicable sentences to adequately notify the resident. For example: This notice informs you that a temporary unit, listed below, has been made available to you and, if you choose this option, you will be required to move by [date no sooner than 30 days after notice]. This notice informs you*

that a comparable unit, listed below, has been made available to you and, if you choose this option, you will be required to move by [*date no sooner than 90 days after notice*].]

If you choose temporary relocation, your relocation exceeds one year and you qualify as a “displaced person” under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), you may become eligible for further relocation assistance and payments under URA.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

If you choose to receive temporary relocation assistance, this assistance will include:

- Payment for Moving Expenses. You are entitled to be reimbursed for all reasonable out-of-pocket expenses incurred in connection with any temporary move. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 4 of this Notice.*]
- The location of your temporary replacement unit is [*address*]. This temporary housing has been determined to be decent, safe and sanitary.
- [*List appropriate relocation advisory services and any other services and assistance provided.*]

If you elect to receive permanent relocation assistance, this assistance will include:

- Relocation Advisory Services. You are entitled to receive current and continuing information on available comparable replacement units and other assistance to help you find another home and prepare to move.
- Payment for Moving Expenses. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 5 of this Notice.*]
- Replacement Housing Payment. You may be eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including: (1) the monthly rent and cost of utility services for a comparable replacement unit, (2) the monthly rent and cost of utility services for your present unit, and (3) 30% of your average monthly gross household income. This payment is calculated on the difference between the old and new housing costs for a one-month period and multiplied by 42.
- [*PHA: list here any permanent relocation assistance offered, such as a Housing Choice Voucher.*]

- Listed below are three comparable replacement units that you may wish to consider for your replacement home. If you would like, we can arrange transportation for you to inspect these and other replacement units.

	Address	Rent & Utility Costs	Contact Info
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____

We believe that the unit located at [address] is most representative of your original unit in the converting RAD project. The monthly rent and the estimated average monthly cost of utilities for this unit is [\$ amount] and it will be used to calculate your maximum replacement housing payment. Please contact us immediately if you believe this unit is not comparable to your original unit. We can explain our basis for selecting this unit as most representative of your original unit and discuss your concerns.

Based on the information you have provided about your income and the rent and utilities you now pay, you may be eligible for a maximum replacement housing payment of approximately [\$ (42 x monthly amount)], if you rent the unit identified above as the most comparable to your current home or rent another unit of equal cost.

Replacement housing payments are not adjusted to reflect future rent increases or changes in income. This is the maximum amount that you would be eligible to receive. If you rent a decent, safe and sanitary home where the monthly rent and average estimated utility costs are less than the comparable unit, your replacement housing payment will be based on the actual cost of that unit. All replacement housing payments must be paid in installments. Your payment will be paid in [#]__ installments.

You may choose to purchase (rather than rent) a decent, safe and sanitary replacement home. If you do, you would be eligible for a down-payment assistance payment which is equal to your maximum replacement housing payment, [\$amount.] [PHAs should note that, at the agency's discretion, a down-payment assistance payment that is less than \$5,250 may be increased to any amount not to exceed \$5,250. (See 49 CFR 24.402(c)(1)).] Let us know if you are interested in purchasing a replacement home and we will help you locate such housing.

Please note that all replacement housing must be inspected in order to ensure it is decent, safe and sanitary before any replacement housing payments are made.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [Name, Title, Address, Phone, Email Address] before you make any moving plans. He/she will assist you with your move to a new home and help ensure that you preserve your eligibility for all relocation payments to which you may be entitled.

Remember, do not move or commit to the purchase or lease of a replacement home before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

Print name:

Title:

Enclosure/s

NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)

Appendix 5: SAMPLE NOTICE OF ELIGIBILITY FOR URA RELOCATION ASSISTANCE (For residents who have been temporarily relocated for more than a year)

***THIS IS A GUIDE FORM.
IT SHOULD BE REVISED TO REFLECT THE CIRCUMSTANCES.***

PHA Letterhead

(date)

Dear [*Resident*]:

The property you formerly occupied at [*address*] is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. You have been temporarily relocated from that property since [*date.*] Your temporary relocation has exceeded one year.

It has been determined that you qualify as a "displaced person" according to the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). You are eligible for relocation assistance and payments under the URA.

You may choose to remain temporarily relocated and return to a unit in the RAD project once it is completed. It is currently estimated that you may return to the RAD project by [*date*]. If you choose to remain temporarily relocated, you will stay at your current location until the RAD project is completed.

Alternatively, you may choose permanent relocation assistance and payments for which you are eligible, as listed below. If you choose permanent relocation assistance, you give up your right to return to the completed RAD project. However, **you do not need to move now.** If you choose permanent relocation assistance instead of exercising your right to return to the completed RAD project, you will not be required to move sooner than 90 days from the date that at least one comparable replacement unit has been made available to you. [*Alternatively: You will not be required to move sooner than 90 days from the date of this notice, which informs you of a comparable replacement unit that has been made available for you.*]

This is your Notice of Eligibility for relocation assistance.

The effective date of your eligibility is [*insert date that relocation exceeds one year.*]

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

Enclosed is a brochure entitled, "Relocation Assistance to Tenants Displaced From Their Homes." Please read the brochure carefully. It explains your rights and provides additional information on eligibility for relocation payments and what you must do in order to receive these payments.

The relocation assistance to which you are entitled includes:

- Relocation Advisory Services. You are entitled to receive current and continuing information on available comparable replacement units and other assistance to help you find another home and prepare to move.
- Payment for Moving Expenses. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 5 of this Notice.*] This is in addition to any amounts received to reimburse for any reasonable out-of-pocket expenses incurred in connection with the temporary move.
- Replacement Housing Payment. You may be eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including: (1) the monthly rent and cost of utility services for a comparable replacement unit, (2) the monthly rent and cost of utility services for your present home, and (3) for low-income persons, 30 percent of your average monthly gross household income. This payment is calculated on the difference between the old and new housing costs for a one-month period and multiplied by 42.
- [*PHA list here any other relocation assistance offered the resident, such as Housing Choice Voucher .*]

Listed below are three comparable replacement units that you may wish to consider for your replacement home. If you would like, we can arrange transportation for you to inspect these and other replacement units.

	Address	Rent & Utility Costs	Contact Info
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____

We believe that the unit located at [*address*] is most representative of the original unit you occupied in the converting RAD project. The monthly rent and the estimated average monthly cost of utilities for this unit is \$[*amount*] and it will be used to calculate your maximum replacement housing payment. Please contact us immediately if you believe this unit is not comparable to your original unit. We can explain our basis for selecting this unit as most representative of your original unit and discuss your concerns.

Based on the information you have provided about your income and the rent and utilities you now pay, you may be eligible for a maximum replacement housing payment of approximately \$ [42 x \$Amount], if you rent the unit identified above as the most comparable to your current home or rent another unit of equal cost.

Replacement housing payments are not adjusted to reflect future rent increases or changes in income. This is the maximum amount that you would be eligible to receive. If you rent a decent, safe and sanitary home where the monthly rent and average estimated utility costs are less than the comparable unit, your replacement housing payment will be based on the actual cost of that unit. All replacement housing payments must be paid in installments. Your payment will be paid in [#] installments.

Should you choose to purchase (rather than rent) a decent, safe and sanitary replacement home, you would be eligible for a downpayment assistance payment which is equal to your maximum replacement housing payment, [\$ amount] [PHAs should note that, at the agency's discretion, a downpayment assistance payment that is less than \$5,250 may be increased to any amount not to exceed \$5,250. (See 49 CFR 24.402(c)(1)).] Let us know if you are interested in purchasing a replacement home and we will help you locate such housing.

Please note that all replacement housing must be inspected in order to ensure it is decent, safe, and sanitary before any replacement housing payments are made.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [Name, Title, Address, Phone, Email Address] before you make any moving plans. He/she will assist you with your move to a new home and help ensure that you preserve your eligibility for any applicable relocation payments.

Remember, do not move or commit to the purchase or lease of a replacement home before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

Print Name:

Title:

Enclosure/s

NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)

Appendix B: Replacement Housing Factor Funds

In September 2013, the PHA Board of Commissioners approved an Amendment to the MTW Agreement that allows Replacement Housing Factor (RHF) funds to be included in the MTW Block Grant. HUD executed the RHF Amendment on February 26, 2014.

Pursuant to the RHF Amendment and related HUD guidance, PHA is providing the following information:

- RHF funds projected for FY 2018 are included in the Sources and Uses tables of the Plan.
- PHA intends to combine all existing and future RHF funds into the MTW Block Grant.
- PHA intends to accumulate RHF funds as allowed under the RHF Amendment, Option 3.
- PHA will secure the commitments for the required one-third leverage of its 2nd Increment RHF funds prior to developing the public or affordable housing under the proportionality requirements of the RHF Amendment, Option3.
- PHA will develop the number of affordable and/or public housing units required in accordance with the proportionality test under the RHF Amendment, Option 3.
- RHF grants that PHA intends to combine into the MTW Block Grant are listed on the table below.

Fiscal Year	Grant Number	Obligation End Date	Expenditure End Date
2016	PA26R002501-16	10/29/2018	10/29/2020
2016	PA26R002502-16	10/29/2018	10/29/2020
2015	PA26R002501-15	10/29/2019	10/29/2021
2015	PA26R002502-15	10/29/2019	10/29/2021
2014	PA26R002501-14	10/29/2019	10/29/2021
2014	PA26R002502-14	10/29/2019	10/29/2021
2013	PA26R002501-13	10/29/2019	10/29/2021
2013	PA26R002502-13	10/29/2019	10/29/2021
2012	PA26R002501-12	10/29/2015	10/29/2017
2012	PA26R002502-12	10/29/2015	10/29/2017
2011	PA26R002501-11	10/29/2015	10/29/2017
2011	PA26R002502-11	10/29/2015	10/29/2017
2010	PA26R002502-10	10/29/2015	10/29/2017

Appendix C: Annual Statement/Performance & Evaluation Report

**Annual Statement/Performance and Evaluation Report
Capital Fund Program (CFP) Part I: Summary**

PHA Name: PHILADELPHIA HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: PA26P00250114	Federal FY of Grant: 2014		
Original Annual Statement Reserve for Disasters/Emergencies Performance and Evaluation Report for Program Year Ending:		Revised Annual Statement (Revision No: 1) Final Performance and Evaluation Report			
Summary by Development Account		Total Estimated Cost			
Line No.		Original Budget	Revised Budget	Obligated	Expended
1	Total Non-CFP Funds				
2	1406 Operations			0.00	0.00
3	1408 Management Improvements			545,403.65	481,536.44
4	1410 Administrative Costs			3,854,222.10	3,854,222.10
5	1411 Audit			0.00	0.00
6	1415 Liquidated Damages			0.00	0.00
7	1430 Fees and Costs			1,459,624.41	970,405.38
8	1440 Site Acquisition			0.00	0.00
9	1450 Site Improvements			0.00	0.00
10	1460 Dwelling Structures			19,412,379.00	11,222,067.25
11	1465.1 Dwelling Equipment-Nonexpendable			0.00	0.00
12	1470 Non-Dwelling Space			13,995.20	6,490.20
13	1475 Non-Dwelling Equipment			1,630,536.34	1,604,511.49
14	1485 Demolition			385,222.75	369,725.75
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration	24,789,050.00	29,335,433.75	0.00	0.00
17	1495 Relocation			1,181,324.47	1,171,191.36
18	1499 Development Activities			922.60	922.60
19	1501 Collateralization or Debt Service	11,854,260.00	7,307,876.25	7,307,876.25	7,307,876.25
20	1502 Contingency				
21	Amount of Annual Grant (Sum of lines 2-20)	36,643,310.00	36,643,310.00	35,791,506.77	26,988,948.82
22	Amount of Line 21 Related to LBP Activities				
23	Amount of Line 21 Related to Section 504 Compliance			913.48	
24	Amount of Line 21 Related to Security - Soft Costs				
25	Amount of Line 21 Related to Security - Hard Costs				
26	Amount of Line 21 Related to Energy Conservation Measures				
Signature of Executive Director and Date		Signature of Public Housing Director and Date			
Kevin A. Jernish, Interim Executive Director					

Annual Statement of Performance and Evaluation Report

Capital Fund Program (CFP)		Grant Type and Number		Capital Fund Program Grant No:		2014				
Part 11: Supporting Pages		PA2690024014								
PIA Name:	Line Item #	General Description of Major Work Categories	Dev/Inf Act No.	Quantity	Total Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments
701701	Finance	Operating Subsidy	1492		1,446,949		0	0	0	
		Total Operating Subsidy Cost	1492		1,446,949		0	0	0	
707229	ISM	Computer Software Licenses, Technical Support, Consultant/Program Implementation	1493		\$50,000		51,704	51,704	381,156	PIA wide system support, upgrades, implementation.
		Total Management Improvement Cost	1492		\$50,000		51,704	51,704	481,542	
000	PIA Wide	Administrative Salaries and Benefits	1492		3,664,331		3,664,331	3,854,232	3,854,232	Administrative Salaries and Benefits
		Total Administrative Cost	1492		3,664,331		3,664,331	3,854,232	3,854,232	
002000	Development	ABE, Legal and Consultant Services	1492		1,000,000		998,149	998,149	676,144	pre-development and design cost
001	Johnson Homes	ABE, Legal and Consultant Services	1492				7,833	7,833	7,833	pre-development and design cost
024	Queen Lane Area	ABE, Legal and Consultant Services	1492				0	0	0	pre-development and design cost
030	Abbotsford Homes	ABE, Legal and Consultant Services	1492				0	0	0	pre-development and design cost
050	Humberg Ayle	ABE, Legal and Consultant Services	1492				130,000	130,000	676	pre-development and design cost
079	Plymouth Hill	ABE, Legal and Consultant Services	1492				3,300	3,300	0	pre-development and design cost
173	Powhall LP Phase 1	ABE, Legal and Consultant Services	1492				0	0	0	pre-development and design cost
004	Strawberry Mallow	ABE, Legal and Consultant Services	1492				46,086	46,086	37,103	pre-development and design cost
401401	Housing Operations	Environmental Inner-LBP Testing and Airborne Monitoring	1492	1.1.5	500,000		0	0	0	To Address or record LBP Testing and Airborne Monitoring at various PIA Locations
001	Johnson Homes	Environmental Inner-LBP Testing and Airborne Monitoring	1492	1.1.5			26,444	26,444	26,444	To Address or record LBP Testing and Airborne Monitoring at various PIA Locations
013	Wilson Park	Environmental Inner-LBP Testing and Airborne Monitoring	1492	1.1.5			934	934	934	To Address or record LBP Testing and Airborne Monitoring at various PIA Locations
015	Harrowden Plaza	Environmental Inner-LBP Testing and Airborne Monitoring	1492	1.1.5			10,130	10,130	9,130	To Address or record LBP Testing and Airborne Monitoring at various PIA Locations

Annual Statement of Performance and Expenditure Report											
Capital Fund Program (CFP)											
Part II: Supporting Pages											
PIHA Name:	Grant Type and Number	Development Number / House ID/MSL/Activity	Line Item #	General Description of Major Work Categories	Percentage Acct No.	Quantity	Original	Revised Budget	Obligated	Expenditure	Comments
Palakshiba Housing Authority	Capital Fund Program Grant No: P-20150020114										2014
018	Arvoh Homes		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		5,330	5,330	4,530	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
020	Spring Garden Apt		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		14,700	14,700	9,800	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
021	Schuyler Hill Pkwy		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		0	0	0	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
024	Queen Lane Apt		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		330	330	330	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
029	Hill Creek		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		14,700	14,700	11,200	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
031	Bertram Village		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		21,120	21,120	21,274	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
032	O'Brien Village		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		9,700	9,700	9,000	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
034	Whitetail Apt		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		993	993	994	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
035	Hicklington Homes		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		8,150	8,150	6,650	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
039	Westport Apt		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		22,400	22,400	20,300	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
046	Haverford Homes		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		1,750	1,750	1,750	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
049	Morton Homes		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		9,100	9,100	8,750	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
055	Fairhill Apt		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		3,752	3,752	3,752	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
063	Kate E. Jackson		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		1,650	1,650	1,650	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
073	Westport Plaza		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		3,302	3,302	3,302	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
081	Hicklington		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		2,149	2,149	2,142	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
082	Maria		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		13,300	13,300	12,950	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
083	Kempster		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		14,700	14,700	11,000	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
084	Crestmont		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		3,300	3,300	3,300	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
085	Fairhill Square		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		17,850	17,850	14,000	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations
086	Francisville		700035	Environmental Inner: LBP Testing and Adherence Monitoring	1492	1.15		19,932	19,932	14,352	To Address as needed LBP Testing and Adherence Monitoring at various PHA Locations

Capital Fund Program (CFP)		Part II: Supporting Pages		PHA Name:		Capital Fund Program Grant No:		2014	
Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Original	Revised Budget	Obligated	Expended	Comment	
807	Lowlow	1492	11.5		11,200	11,800	11,800	To Address as needed LBP Testing and Abatement Monitoring at various PHA Locations	
808	Shequama	1492	11.5		9,330	9,330	9,330	To Address as needed LBP Testing and Abatement Monitoring at various PHA Locations	
809	Strawberry Mansion	1492	11.5		13,750	13,750	13,750	To Address as needed LBP Testing and Abatement Monitoring at various PHA Locations	
810	Oxford Johnson	1492	11.5	0	11,230	11,230	7,960	To Address as needed LBP Testing and Abatement Monitoring at various PHA Locations	
Total Professional Services Costs and Fees		1492		1,500,000	1,457,624	1,457,624	970,485		
PHAs Wide Site Improvements									
401401	Housing Operations	1492	Variable	450,000		913	913	2,20	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
001	Johnson Homes	1492	Variable		32,389	32,389	32,389	32,389	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
003	Richard Allen	1492	Variable		7,471	7,471	6,937	6,937	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
010	Raymond Koons	1492	Variable		18,210	18,210	16,403	16,403	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
013	William Park	1492	Variable		37,063	37,063	32,399	32,399	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
014	Norris Apt	1492	Variable		9,518	9,518	5,306	5,306	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
015	Henderson Plaza	1492	Variable		43,812	43,812	21,473	21,473	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
018	Arch Home	1492	Variable		5,302	5,302	5,302	5,302	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
020	Spring Garden Apt.	1492	Variable		3,926	3,926	3,926	3,926	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
024	Hill Creek	1492	Variable		33,935	33,935	18,716	18,716	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
030	Abbeville/Homes	1492	Variable		13,125	13,125	13,044	13,044	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
032	Oxford Village	1492	Variable		38,036	38,036	36,433	36,433	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
034	Whitcomb Apt	1492	Variable		4,481	4,481	4,398	4,398	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
035	Hicklington Homes	1492	Variable		4,937	4,937	4,707	4,707	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
042	Cherryland Homes	1492	Variable		14,936	14,936	14,739	14,739	Annual Impediments will be about \$150,000 for the Impediment of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.

Annual Statement of Expenses and Evaluation Report

Capital Fund Program (CFP)		Part III: Supporting Pages		PHA Name:		Capital Fund Program Grant No:		Development And No.		Quantity		Total Estimated Cost		Comment #	
Line Item #	General Description of Major Work Categories	Revised Budget	Obligated	Expended	Original	Revised Budget	Obligated	Expended	Original	Revised Budget	Obligated	Expended	Original	Revised Budget	Obligated
64C	Inverfern Homes	2,162	2,162	2,172	2,172	2,162	2,162	2,172	2,172	2,162	2,162	2,172	2,172	2,162	2,162
64A	Marion Home	21,387	21,387	15,636	15,636	21,387	21,387	15,636	15,636	21,387	21,387	15,636	15,636	21,387	21,387
64B	Birmingham	1,847	1,847	1,847	1,847	1,847	1,847	1,847	1,847	1,847	1,847	1,847	1,847	1,847	1,847
64C	Parish Hill	2,837	2,837	2,802	2,802	2,837	2,837	2,802	2,802	2,837	2,837	2,802	2,802	2,837	2,837
64D	Collegeview	11,018	11,018	3,948	3,948	11,018	11,018	3,948	3,948	11,018	11,018	3,948	3,948	11,018	11,018
100	Coal B Moore	3,455	3,455	3,455	3,455	3,455	3,455	3,455	3,455	3,455	3,455	3,455	3,455	3,455	3,455
104	Adams Home	364	364	329	329	364	364	329	329	364	364	329	329	364	364
601	Hicklington	45,171	45,171	43,487	43,487	45,171	45,171	43,487	43,487	45,171	45,171	43,487	43,487	45,171	45,171
602	Marion	47,385	47,385	41,756	41,756	47,385	47,385	41,756	41,756	47,385	47,385	41,756	41,756	47,385	47,385
603	Kingsring	90,973	90,973	97,881	97,881	90,973	90,973	97,881	97,881	90,973	90,973	97,881	97,881	90,973	90,973
604	Greenwood	37,498	37,498	36,443	36,443	37,498	37,498	36,443	36,443	37,498	37,498	36,443	36,443	37,498	37,498
605	Parish Square	52,415	52,415	50,058	50,058	52,415	52,415	50,058	50,058	52,415	52,415	50,058	50,058	52,415	52,415
606	Francisville	98,803	98,803	96,237	96,237	98,803	98,803	96,237	96,237	98,803	98,803	96,237	96,237	98,803	98,803
607	Ladlow	86,333	86,333	79,380	79,380	86,333	86,333	79,380	79,380	86,333	86,333	79,380	79,380	86,333	86,333
608	Shelby Home	85,550	85,550	77,133	77,133	85,550	85,550	77,133	77,133	85,550	85,550	77,133	77,133	85,550	85,550
609	Strawberry Mansion	67,032	67,032	66,931	66,931	67,032	67,032	66,931	66,931	67,032	67,032	66,931	66,931	67,032	67,032
610	Chapel Hill	28,136	28,136	24,868	24,868	28,136	28,136	24,868	24,868	28,136	28,136	24,868	24,868	28,136	28,136
610	Birmingham	0	0	0	0	0	0	0	0	0	0	0	0	0	0
611	Adams Home	1,636	1,636	1,636	1,636	1,636	1,636	1,636	1,636	1,636	1,636	1,636	1,636	1,636	1,636
612	Hill Creek	2,303	2,303	2,303	2,303	2,303	2,303	2,303	2,303	2,303	2,303	2,303	2,303	2,303	2,303
613	Hicklington	1,278	1,278	1,278	1,278	1,278	1,278	1,278	1,278	1,278	1,278	1,278	1,278	1,278	1,278

Annual Statement/Performance and Evaluation Report											
Capital Fund Program (CFP)											
Part II: Supporting Pages											
PHA Name/	Grant Type and Number	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Original	Revised Budget	Obligated	Expended	Comments	
Developmental Programs/Projects/Initiatives/Activities	Capital Fund Program Grant No: P-2/P0021014									2014	
002	Martin	70092	Landscape, Tree Trimming	1492	Variable	5,446	5,446	5,446	5,446	Call Branches, Remove Tree Stumps as Needed at Various Site Locations	
003	Cragoosing	70092	Landscape, Tree Trimming	1492	Variable	9,243	9,243	9,243	7,999	Call Branches, Remove Tree Stumps as Needed at Various Site Locations	
007	Ludlow	70092	Landscape, Tree Trimming	1492	Variable	351	351	351	211	Call Branches, Remove Tree Stumps as Needed at Various Site Locations	
008	Shoemaker	70092	Landscape, Tree Trimming	1492	Variable	1,963	1,963	1,963	1,963	Call Branches, Remove Tree Stumps as Needed at Various Site Locations	
010	Orion Jefferson	70092	Landscape, Tree Trimming	1492	Variable	2,802	2,802	2,802	2,802	Call Branches, Remove Tree Stumps as Needed at Various Site Locations	
			Total PHA Wide Site Improvements			450,000	971,789	971,789	860,211		
			Total Site Improvements	1492		450,000	971,789	971,789	860,211		
			PHU Wide Driveway Sidewalks								
019	West Park Apt4	701165	Elevator Repair	1492	1,1,5	2,806,000	4,878,000	4,878,000	0	Replace Elevator System in old High Rise in West Park Apartments	
001	Johnson Home	700179	Environmental Hazard Abatement	1492	Variable	9,824	9,824	9,824	9,824	To Remove Toxic Waste Material As Needed	
010	Raymond Room	700179	Environmental Hazard Abatement	1492	Variable	14,435	14,435	14,435	0	To Remove Toxic Waste Material As Needed	
015	Hambour Plaza	700179	Environmental Hazard Abatement	1492	Variable	11,679	11,679	11,679	11,679	To Remove Toxic Waste Material As Needed	
020	Spring Garden Apt4	700179	Environmental Hazard Abatement	1492	Variable	14,639	14,639	14,639	8,339	To Remove Toxic Waste Material As Needed	
029	Hill Creek	700179	Environmental Hazard Abatement	1492	Variable	0	0	0	0	To Remove Toxic Waste Material As Needed	
014	Whitaker Apt4	700179	Environmental Hazard Abatement	1492	Variable	6,531	6,531	6,531	6,531	To Remove Toxic Waste Material As Needed	
019	West Park Apt4	700179	Environmental Hazard Abatement	1492	Variable	10,338	10,338	10,338	10,338	To Remove Toxic Waste Material As Needed	
015	Paulhill Apt4	700179	Environmental Hazard Abatement	1492	Variable	11,843	11,843	11,843	11,843	To Remove Toxic Waste Material As Needed	
027	Stearby Hall	700179	Environmental Hazard Abatement	1492	Variable	6,792	6,792	6,792	6,792	To Remove Toxic Waste Material As Needed	
103	Martin I	700179	Environmental Hazard Abatement	1492	Variable	8,004	8,004	8,004	8,004	To Remove Toxic Waste Material As Needed	
002	Martin	700179	Environmental Hazard Abatement	1492	Variable	199	199	199	199	To Remove Toxic Waste Material As Needed	

Annual Performance and Evaluation Report

Capital Fund Program (CFP)		Grant Type and Number		Capital Fund Program Grant No		Fiscal Year		Comments	
Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments
010	Reynolds Room	1492	Varies	0	0	84,816	84,816	84,816	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
011	Wilson Park	1492	Varies	0	0	61,761	61,761	61,761	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
014	North Apt	1492	Varies	0	0	46,756	46,756	46,756	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
015	Harrison Plaza	1492	Varies	0	0	642	642	642	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
020	Spring Garden Apt	1492	Varies	0	0	3,473	3,473	3,473	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
024	Old Creek	1492	Varies	0	0	2,553	2,553	2,553	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
031	Bartram Village	1492	Varies	0	0	20,139	20,139	20,139	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
032	Orchard Village	1492	Varies	0	0	1,431	1,431	1,431	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
034	Whitshell	1492	Varies	0	0	29,100	29,100	29,100	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
035	Redington Homes	1492	Varies	0	0	126	126	126	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
039	West Park Apt	1492	Varies	0	0	697	697	697	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
041	Chapelwood Home	1492	Varies	0	0	1,172	1,172	1,172	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
046	Haverford Homes	1492	Varies	0	0	349	349	349	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
049	Morton Homes	1492	Varies	0	0	13,666	13,666	13,666	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
050	Humberg Apt	1492	Varies	0	0	3,342	3,342	3,342	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
055	Fairhill Apt	1492	Varies	0	0	18,194	18,194	18,194	Interior Repair, Kitchen, Bathrooms to Conventional Sher Units
024	Queen Lane Apt	1492	Varies	0	0	0	0	0	Unit to Renovate Units that are not part of the Queen Lane LP
015	Harrison Plaza	1492	Varies	0	0	33,889	33,889	33,889	Emergency Repair to the Exterior Brickwork
006	Francisville	1492	Varies	0	0	22,653	22,653	22,653	Emergency Repair to the Exterior Brickwork
001	Johnson Homes	1492	Varies	25,000	25,000	52,300	52,300	52,300	504 Unit Modification for Heating
003	Robson Allen	1492	Varies	25,000	25,000	16,926	16,926	16,926	504 Unit Modification for Heating

Annual Statement Performance and Evaluation Report													
Capital Fund Program (CFP)													
Part II: Supporting Pages													
PHA Name:	Grant Type and Number	Capital Fund Program Grant No:	Developmental Number / Home ID/AD/AD/AD/AD	Line Item #	General Description of Major Work Category	Develop Acct No.	Quantity	Total Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments
618	Raymond Rosen			701098	504 Unit Modification/Per Housing	1492	Units	25,000	10,170	10,170	10,170	9,242	504 Unit Modification/Per Housing
613	William Park			701098	504 Unit Modification/Per Housing	1492	Units	25,000	15,735	15,735	15,735	15,732	504 Unit Modification/Per Housing
614	North Apt			701098	504 Unit Modification/Per Housing	1492	Units	25,000	6,403	6,403	6,403	6,403	504 Unit Modification/Per Housing
615	Harrison Plaza			701098	504 Unit Modification/Per Housing	1492	Units	25,000	25,335	25,335	25,335	25,279	504 Unit Modification/Per Housing
618	Arch Home			701098	504 Unit Modification/Per Housing	1492	Units	25,000	445	445	445	445	504 Unit Modification/Per Housing
620	Spring Garden Apt			701098	504 Unit Modification/Per Housing	1492	Units	25,000	10,730	10,730	10,730	10,692	504 Unit Modification/Per Housing
624	Queen Lane Apt			701098	504 Unit Modification/Per Housing	1492	Units	0	0	0	0	0	504 Unit Modification/Per Housing
628	Hill Creek			701098	504 Unit Modification/Per Housing	1492	Units	25,000	15,918	15,918	15,918	15,870	504 Unit Modification/Per Housing
630	Abbeville			701098	504 Unit Modification/Per Housing	1492	Units	25,000	2,500	2,500	2,500	2,500	504 Unit Modification/Per Housing
631	Harrison Village			701098	504 Unit Modification/Per Housing	1492	Units	25,000	15,532	15,532	15,532	15,533	504 Unit Modification/Per Housing
632	Oakleaf Village			701098	504 Unit Modification/Per Housing	1492	Units	25,000	40,393	40,393	40,393	39,338	504 Unit Modification/Per Housing
634	Whitfield			701098	504 Unit Modification/Per Housing	1492	Units	25,000	9,341	9,341	9,341	7,170	504 Unit Modification/Per Housing
635	Henderson Home			701098	504 Unit Modification/Per Housing	1492	Units	25,000	0	0	0	0	504 Unit Modification/Per Housing
639	West Park Apt			701098	504 Unit Modification/Per Housing	1492	Units	25,000	1,474	1,474	1,474	1,474	504 Unit Modification/Per Housing
642	Chapel Hill Home			701098	504 Unit Modification/Per Housing	1492	Units	25,000	1,490	1,490	1,490	1,490	504 Unit Modification/Per Housing
644	Harwood Home			701098	504 Unit Modification/Per Housing	1492	Units	25,000	0	0	0	0	504 Unit Modification/Per Housing
649	Marion Home			701098	504 Unit Modification/Per Housing	1492	Units	25,000	11,311	11,311	11,311	11,306	504 Unit Modification/Per Housing
650	Hillsberg			701098	504 Unit Modification/Per Housing	1492	Units	25,000	491	491	491	491	504 Unit Modification/Per Housing
654	Park View			701098	504 Unit Modification/Per Housing	1492	Units	25,000	0	0	0	0	504 Unit Modification/Per Housing
655	Pinball Apt			701098	504 Unit Modification/Per Housing	1492	Units	25,000	3,389	3,389	3,389	3,339	504 Unit Modification/Per Housing
662	James B. Hoiby			701098	504 Unit Modification/Per Housing	1492	Units	0	997	997	997	997	504 Unit Modification/Per Housing

Annual Statement of Performance and Evaluation Report

Capital Fund Program (CFP)		Grant Type and Number		Capital Fund Program Grant No.		Fiscal Year		Reporting Period	
Line Item #	General Description of Major Work Category	Reporting Act No.	Quantity	Total Estimated Cost	Revised Budget	Obligated	Expended	Comment #	
603	Kate B. Jackson	1492	Varies	25,000	760	1,103	1,103	504 Unit Modification/Par Housing	
605	Collegeview	1492	Varies	0	383	383	383	504 Unit Modification/Par Housing	
606	Holmwood	1492	Varies	25,000	1,368	1,368	1,368	504 Unit Modification/Par Housing	
676	Harbor Vista	1492	Varies	25,000	0	0	0	504 Unit Modification/Par Housing	
677	Bentley Hill	1492	Varies	25,000	3,311	3,311	2,637	504 Unit Modification/Par Housing	
678	Plymouth Hill	1492	Varies	25,000	122	122	122	504 Unit Modification/Par Housing	
693	Westpark Plaza	1492	Varies	0	1,495	1,495	1,495	504 Unit Modification/Par Housing	
100	East B. Moore	1492	Varies	0	614	614	614	504 Unit Modification/Par Housing	
114	Shady B. Jacobs	1492	Varies	25,000	2,469	2,469	2,546	504 Unit Modification/Par Housing	
133	Rickard Allen Bldg.	1492	Varies	0	440	440	440	504 Unit Modification/Par Housing	
145	Jacobs Blackwell I	1492	Varies	0	472	472	472	504 Unit Modification/Par Housing	
149	Martin Luther King IV	1492	Varies	0	234	234	234	504 Unit Modification/Par Housing	
152	Downtown House	1492	Varies	0	4,395	4,395	4,395	504 Unit Modification/Par Housing	
153	Jacobs Blackwell II	1492	Varies	0	2,404	2,404	2,404	504 Unit Modification/Par Housing	
158	Nellie Reynolds Garden	1492	Varies	0	0	343	343	504 Unit Modification/Par Housing	
160	Warrock I	1492	Varies	0	3,072	3,072	3,072	504 Unit Modification/Par Housing	
163	Martinez I	1492	Varies	0	4,425	4,425	4,425	504 Unit Modification/Par Housing	
178	Queen's Row	1492	Varies	0	2,713	4,194	4,194	504 Unit Modification/Par Housing	
501	772 N. 16th Street	1492	Varies	0	1,159	1,159	1,159	504 Unit Modification/Par Housing	
503	Scattered Sites	1492	Varies	25,000	12,277	12,277	12,277	504 Unit Modification/Par Housing	
502	Scattered Sites	1492	Varies	25,000	685,612	737,173	714,393	504 Unit Modification/Par Housing	

Annual Statement of Performance and Evaluation Report

Capital Fund Program (CFP)		Part II: Supporting Pages		PHA Name:		Capital Fund Program Grant No:		Fiscal Year		Fiscal Year		Fiscal Year		Fiscal Year		Fiscal Year	
Line Item #	General Description of Major Work Categories	Developer Acct No.	Quantity	Unit Estimated Cost	Revised Budget	Obligated	Expended	Comment #									
803	Scattered Sites	1492	Units	35,000	35,841	35,541	39,322	504 Unit Modification/Housing									
804	Scattered Sites	1492	Units	35,000	36,051	36,051	34,887	504 Unit Modification/Housing									
805	Scattered Sites	1492	Units	35,000	29,740	31,366	30,973	504 Unit Modification/Housing									
806	Scattered Sites	1492	Units	35,000	44,439	44,439	44,193	504 Unit Modification/Housing									
807	Scattered Sites	1492	Units	35,000	33,073	33,164	31,127	504 Unit Modification/Housing									
808	Scattered Sites	1492	Units	25,000	20,018	20,018	19,274	504 Unit Modification/Housing									
809	Scattered Sites	1492	Units	35,000	60,735	60,735	60,482	504 Unit Modification/Housing									
810	Scattered Sites	1492	Units	25,000	16,134	16,134	16,134	504 Unit Modification/Housing									
Total PHA Wide Dwelling Unit Improvements																	
Scattered Sites/Dwellings Unit Remediation																	
700460	Madison	1492	Units	600,000	88,000	28,204	20,200	Major interior structural work on various scattered sites including walls, floor joists, mechanical repairs, lockers and bathrooms									
700460	Madison	1492	Units	600,000	804,416	803,134	797,319	Major interior structural work on various scattered sites including walls, floor joists, mechanical repairs, lockers and bathrooms									
700460	Clayton	1492	Units	600,000	510,000	471,862	468,219	Major interior structural work on various scattered sites including walls, floor joists, mechanical repairs, lockers and bathrooms									
700460	Germano/Hunting Park	1492	Units	600,000	300,000	290,599	297,322	Major interior structural work on various scattered sites including walls, floor joists, mechanical repairs, lockers and bathrooms									
700460	Palmer Square	1492	Units	600,000	1,164,347	1,135,457	1,117,780	Major interior structural work on various scattered sites including walls, floor joists, mechanical repairs, lockers and bathrooms									
700460	Princetonville	1492	Units	600,000	510,000	460,172	449,723	Major interior structural work on various scattered sites including walls, floor joists, mechanical repairs, lockers and bathrooms									
700460	Lawton	1492	Units	600,000	33,013	21,033	22,716	Major interior structural work on various scattered sites including walls, floor joists, mechanical repairs, lockers and bathrooms									
700460	Shepherdson	1492	Units	600,000	1,323,715	1,446,133	1,434,298	Major interior structural work on various scattered sites including walls, floor joists, mechanical repairs, lockers and bathrooms									
700460	Starbuckery Market	1492	Units	600,000	875,436	875,436	868,444	Major interior structural work on various scattered sites including walls, floor joists, mechanical repairs, lockers and bathrooms									
700460	Oxley/Jefferson	1492	Units	600,000	517,910	500,792	497,742	Major interior structural work on various scattered sites including walls, floor joists, mechanical repairs, lockers and bathrooms									
701309	Madison	1492	Units	0	0	0	0	Major renovation to Scattered Sites Units for Blumberg Volunteer Education									

Annual Statement of Performance and Evaluation Report									
Capital Fund Program (CFP)									
Part II - Supporting Pages									
PHA Name:									
Philadelphia Housing Authority									
Capital Fund Program Grant No. PA34990150114									
Division Number Name (FA-Mile Available)	Line Item #	General Description of Major Work Categories	Division Acct No.	Quantity	Unit Estimated Cost	Revised Budget	Obligated	Response	Comment
					Original				
802	Mantus	701309 Comprehensive Unit MCO	1492	Units	0	95,537	95,537	95,537	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
803	Englewood	701309 Comprehensive Unit MCO	1492	Units	0	309,934	309,934	309,934	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
806	Frankville	701309 Comprehensive Unit MCO	1492	Units	0	58,840	58,840	58,840	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
808	Shenesham	701309 Comprehensive Unit MCO	1492	Units	0	512,268	512,268	512,268	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
809	Strawberry Mansion	701309 Comprehensive Unit MCO	1492	Units	0	200,135	200,135	200,135	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
810	Oxden Hollow	701309 Comprehensive Unit MCO	1492	Units	0	291,501	291,501	291,501	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
807	Ladbaw	700782 Maturity	1492	Units	0	27,433	27,433	20,902	Repair Exterior Porch of Unit in SS 9071, Ladbaw
801	Haddington	700435 Comp Unit Renovations Work	1492	Units	0	370	370	270	PM Needed Structural Repairs at Scattered Sites Locations
802	Mantus	700435 Comp Unit Renovations Work	1492	Units	0	16,706	16,706	16,706	PM Needed Structural Repairs at Scattered Sites Locations
803	Englewood	700435 Comp Unit Renovations Work	1492	Units	0	5,870	5,870	5,870	PM Needed Structural Repairs at Scattered Sites Locations
804	Germanow/Hunting Park	700435 Comp Unit Renovations Work	1492	Units	0	0	0	0	PM Needed Structural Repairs at Scattered Sites Locations
805	Parfitt Square	700435 Comp Unit Renovations Work	1492	Units	0	2,865	2,865	2,865	PM Needed Structural Repairs at Scattered Sites Locations
806	Frankville	700435 Comp Unit Renovations Work	1492	Units	0	85	85	85	PM Needed Structural Repairs at Scattered Sites Locations
807	Ladbaw	700435 Comp Unit Renovations Work	1492	Units	0	2,714	2,714	2,714	PM Needed Structural Repairs at Scattered Sites Locations
808	Shenesham	700435 Comp Unit Renovations Work	1492	Units	0	0	0	0	PM Needed Structural Repairs at Scattered Sites Locations
809	Strawberry Mansion	700435 Comp Unit Renovations Work	1492	Units	0	1,914	1,914	1,714	PM Needed Structural Repairs at Scattered Sites Locations
810	Oxden Hollow	700435 Comp Unit Renovations Work	1492	Units	0	0	0	0	PM Needed Structural Repairs at Scattered Sites Locations
805	Parfitt Square	701390 Comprehensive Unit Rehab	1492	Units	0	0	0	0	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, bibbons and bathrooms
806	Frankville	701390 Comprehensive Unit Rehab	1492	Units	0	0	0	0	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, bibbons and bathrooms
809	Strawberry Mansion	701390 Comprehensive Unit Rehab	1492	Units	0	8,154	8,154	8,154	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, bibbons and bathrooms
803	Englewood	701409 Comprehensive Unit MCO	1492	Units	0	27,000	27,000	176,560	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, bibbons and bathrooms

Annual Statement of Performance and Evaluation Report

Capital Fund Program (CFP)		Part II: Supporting Pages		PHA Name:		Capital Fund Program Grant No:		Comments	
Division Number / Name (A-W)	Line Item #	General Description of Major Work Categories	Reporting Acct No	Quantity	Original	Revised Budget	Obligated	Revised Budget	Comments
000	701489	Comprehensive Unit MCO	1492	Units	0	71,033	71,033	71,033	71,033
001	701489	Comprehensive Unit MCO	1492	Units	0	406,350	406,350	406,350	406,350
002	701489	Comprehensive Unit MCO	1492	Units	0	332,003	332,003	332,003	332,003
003	701489	Comprehensive Unit MCO	1492	Units	0	248,320	248,320	248,320	248,320
Scattered Site Unit Renovation Total				215	6,000,000	8,899,276	8,799,225	8,800,276	
Total Dwelling Structures					162,000,000	19,451,843	19,412,279	11,222,067	
020	701075	HYAC Uprgrades	1492	113		1,283	1,283	1,283	1,283
000000	701508	Storage	1492	Units	0	3,310	3,310	3,310	3,310
010	701508	Storage	1492	Units	0	3,499	0	0	0
013	701508	Storage	1492	Units	0	9,271	0	0	0
014	701508	Storage	1492	Units	0	1,704	0	0	0
031	701508	Storage	1492	Units	0	1,670	0	0	0
032	701508	Storage	1492	Units	0	275	0	0	0
034	701508	Storage	1492	Units	0	803	0	0	0
042	701508	Storage	1492	Units	0	506	0	0	0
044	701508	Storage	1492	Units	0	349	0	0	0
048	701508	Storage	1492	Units	0	1,412	0	0	0
049	701508	Storage	1492	Units	0	2,842	0	0	0
055	701508	Storage	1492	Units	0	1,822	0	0	0
083	700292	Down and Relocate	1492	Units	0	7,123	7,123	7,123	7,123

Annual Statement of Performance and Evaluation Report

Capital Fund Program (CFP)		Part 11: Supporting Pages		PHA Name:		Capital Fund Program Grant No.:		Fiscal Year:	
Line Item #	Current Description of Major Work Categories	Quantity	Unit Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments	
114	Shelby B. Jacobs	Varies		0	2,375	2,375	1,993	Replace Exterior Entry Doors	
Total Non-Dwelling Structures				0	44,407	13,995	6,490		
Non-Dwelling Equipment									
70079	Community Space F. & EM	11.5	35,000		114,239	114,239	114,239	Full scheduled replacement of office equipment throughout PHA, office and site locations	
70787	Community Space F. & EM	11.5	0		28,462	28,462	28,334	Full scheduled replacement of office equipment throughout PHA, office and site locations	
70799	Community Space F. & EM	11.5	250,000		649,842	649,842	636,973	The purchase of 200 replacement computers throughout PHA. Also includes server and network equipment throughout PHA, office and site locations	
70814	Telephone Infrastructure Upgrades	11.5	100,000		33,448	33,448	34,013	Telephone equipment including but not limited to network switches and IVR upgrades	
70123	Maintenance Equipment	11.5	75,000		573,663	573,663	572,319	repair/replace maintenance equipment including but not limited to landscaping, snow removal and small equipment throughout PHA, office and site locations	
70123	Maintenance Equipment	11.5	0		719	719	719	repair/replace maintenance equipment including but not limited to landscaping, snow removal and small equipment throughout PHA, office and site locations	
70123	Maintenance Equipment	11.5	0		719	719	719	repair/replace maintenance equipment including but not limited to landscaping, snow removal and small equipment throughout PHA, office and site locations	
70123	Maintenance Equipment	11.5	0		719	719	719	repair/replace maintenance equipment including but not limited to landscaping, snow removal and small equipment throughout PHA, office and site locations	
70123	Maintenance Equipment	11.5	0		719	719	719	repair/replace maintenance equipment including but not limited to landscaping, snow removal and small equipment throughout PHA, office and site locations	
910012	Personal Equipment	11.5	0		71,363	71,363	64,332	Replace Hazardous Payground Equipment for Safety Reasons	
910012	Personal Equipment	11.5	0		62,000	62,000	61,984	Replace Hazardous Payground Equipment for Safety Reasons	
910012	Personal Equipment	11.5	0		9,038	9,038	9,038	Replace Hazardous Payground Equipment for Safety Reasons	
Total Non-Dwelling Equipment				480,000	1,620,536	1,620,536	1,604,211		
70082	Demolition	14.5	377,740		0	0	0	Cost to Remove Hazardous and/or Collapsed Building in Response to City Inspection	
70082	Demolition	11.5	0		10,000	10,000	10,000	Cost to Remove Hazardous and/or Collapsed Building in Response to City Inspection	
70082	Demolition	11.5	0		34,323	34,323	34,928	Cost to Remove Hazardous and/or Collapsed Building in Response to City Inspection	
70082	Demolition	11.5	0		10,000	10,000	10,000	Cost to Remove Hazardous and/or Collapsed Building in Response to City Inspection	
Total Demolition				377,740	384,323	384,323	369,928		
70084	Retiree Pension	11.5	150,000		0	0	0	Retiree Pension as noted through our PHA.	

Annual Activities/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:										
Philadelphia Housing Authority										
Grant Type and Number										
Capital Fund Program Grant No P-2109010114										
Account Number / Name / FA/NA/Activity	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Revised Budget	Obligated	Expended	Comments
					Original	Revised				
001	7008-54	Relocation	1492	11.5	0	2,422	2,422	2,422	2,422	Relocations as needed through out PHA.
010	7008-54	Relocation	1492	11.5	0	2,572	2,572	2,572	2,572	Relocations as needed through out PHA.
013	7008-54	Relocation	1492	11.5	0	2,315	2,315	2,315	2,315	Relocations as needed through out PHA.
014	7008-54	Relocation	1492	11.5	0	1,043	1,043	1,043	1,043	Relocations as needed through out PHA.
015	7008-54	Relocation	1492	11.5	0	1,094	1,094	1,094	1,094	Relocations as needed through out PHA.
018	7008-54	Relocation	1492	11.5	0	3,864	3,864	3,864	3,864	Relocations as needed through out PHA.
020	7008-54	Relocation	1492	11.5	0	1,171	1,171	1,171	1,171	Relocations as needed through out PHA.
029	7008-54	Relocation	1492	11.5	0	0	0	0	0	Relocations as needed through out PHA.
031	7008-54	Relocation	1492	11.5	0	35,050	35,050	35,050	35,050	Relocations as needed through out PHA.
034	7008-54	Relocation	1492	11.5	0	2,731	2,731	2,731	2,731	Relocations as needed through out PHA.
035	7008-54	Relocation	1492	11.5	0	2,382	2,382	2,382	2,382	Relocations as needed through out PHA.
039	7008-54	Relocation	1492	11.5	0	2,471	2,471	2,471	2,471	Relocations of Elmhurst & Conkatz through out PHA.
040	7008-54	Relocation	1492	11.5	0	1,035,680	1,035,680	1,035,680	1,035,680	Relocations of Elmhurst & Conkatz through out PHA.
041	7008-54	Relocation	1492	11.5	0	1,043	1,043	1,043	1,043	Relocations of Elmhurst & Conkatz through out PHA.
042	7008-54	Relocation	1492	11.5	0	0	0	0	0	Relocations of Elmhurst & Conkatz through out PHA.
043	7008-54	Relocation	1492	11.5	0	1,237	1,237	1,237	1,237	Relocations of Elmhurst & Conkatz through out PHA.
044	7008-54	Relocation	1492	11.5	0	4,238	4,238	4,238	4,238	Relocations as needed through out PHA.
045	7008-54	Relocation	1492	11.5	0	3,855	3,855	3,855	3,855	Relocations as needed through out PHA.
046	7008-54	Relocation	1492	11.5	0	3,635	3,635	3,635	3,635	Relocations as needed through out PHA.
047	7008-54	Relocation	1492	11.5	0	4,621	4,621	4,621	4,621	Relocations as needed through out PHA.
048	7008-54	Relocation	1492	11.5	0	3,249	3,249	3,249	3,249	Relocations as needed through out PHA.

**Annual Statement/Performance and Evaluation Report
Capital Fund Program (CFP) Part I: Summary**

PHA Name: PHILADELPHIA HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: PA26P00250115	Federal FY. of Grant: 2015		
Original Annual Statement Reserve for Disasters/Emergencies Performance and Evaluation Report for Program Year Ending:		Revised Annual Statement (Revision No: 4) Final Performance and Evaluation Report	Total Estimated Cost		
Line No.	Summary by Development Account	Original Budget	Revised Budget	Obligated	Expended
1	Total Non-CFP Funds				
2	1406 Operations			0.00	0.00
3	1408 Management Improvements			597,727.15	240,719.21
4	1410 Administrative Costs			3,701,497.25	3,701,497.25
5	1411 Audit			0.00	0.00
6	1415 Liquidated Damages			0.00	0.00
7	1430 Fees and Costs			628,910.28	162,613.80
8	1440 Site Acquisition			0.00	0.00
9	1450 Site Improvements			0.00	0.00
10	1460 Dwelling Structures			6,153,895.13	3,109,083.17
11	1465.1 Dwelling Equipment-Nonexpendable			0.00	0.00
12	1470 Non-Dwelling Space			0.00	0.00
13	1475 Non-Dwelling Equipment			3,978.80	2,958.13
14	1485 Demolition			0.00	0.00
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration	29,696,241.75	29,699,022.75	0.00	0.00
17	1495 Relocation			29,759.89	29,759.89
18	1499 Development Activities			0.00	0.00
19	1501 Collateralization or Debt Service	7,299,606.25	7,299,606.25	6,127,500.00	6,127,500.00
20	1502 Contingency				
21	Amount of Annual Grant (Sum of lines 2-20)	36,995,848.00	36,998,629.00	17,243,268.50	13,374,131.45
22	Amount of Line 21 Related to LBP Activities				
23	Amount of Line 21 Related to Section 504 Compliance	900,000.00	0.00		
24	Amount of Line 21 Related to Security - Soft Costs				
25	Amount of Line 21 Related to Security - Hard Costs				
26	Amount of Line 21 Related to Energy Conservation Measures				
Signature of Executive Director and Date		Signature of Public Housing Director and Date			
Kevin A. Jorjani, President and Chief Executive Officer					

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:	Grant Type and Number									
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250115									
2015										
Development Number	Line Item #	General Description of Major Work Categories	Develop Acct. No.	Quantity	Total Filled/Est. Cost	Original	Revised Budget	Obligated	Expended	Comments
701701	701100	Operating Subsidy	1492		879,769.75	879,769.75	86,302	0	0	
		Total Operating Subsidy Cost	1492		879,769.75	86,302	0	0	0	
		Management Improvements								
709709	700176	Computer Software Acquisition, Production Support, Customization, and Program Implementation	1492		600,000.00	600,000.00	600,000	597,727	240,719	PHA wide system support, upgrades, implementations.
		Total Management Improvement Cost	1492		600,000.00	600,000.00	600,000	597,727	240,719	
		Administrative Costs								
000	700183	Administrative Salaries and Benefits	1492		3,699,862.00	3,699,862	3,701,497	3,701,497	3,701,497	Administrative Salaries and Benefits
		Total Administrative Cost	1492		3,699,862.00	3,699,862	3,701,497	3,701,497	3,701,497	
		Fees and Costs								
800860	700185	A&E, Legal and Consultant Services	1492		1,000,000.00	565,735	428,680	114,039	0	pre-development and design cost
014	700185	A&E, Legal and Consultant Services	1492		0.00	81,193	89,627	46,575	0	pre-development and design cost
015	700185	A&E, Legal and Consultant Services	1492		0.00	95,960	0	0	0	pre-development and design cost
018	700185	A&E, Legal and Consultant Services	1492		0.00	95,960	0	0	0	pre-development and design cost
024	700185	A&E, Legal and Consultant Services	1492		0.00	62,694	0	0	0	pre-development and design cost

Annual Statement/Performance and Evaluation Report											
Capital Fund Program (CFP)											
Part II: Supporting Pages											
PHA Name:	Grant Type and Number										
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250115										
2015											
Development Number / Name IIA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments	
050	700185	A&E, Legal and Consultant Services	1492		0.00	0.00	94,093	0	0	pre-development and design cost	
055	700185	A&E, Legal and Consultant Services	1492		0.00	0.00	94,093	0	0	pre-development and design cost	
059	700185	A&E, Legal and Consultant Services	1492		0.00	0.00	42,305	0	0	pre-development and design cost	
059	700185	A&E, Legal and Consultant Services	1492		0.00	0.00	169,800	100,800	0	pre-development and design cost	
079	700185	A&E, Legal and Consultant Services	1492		0.00	0.00	69,575	0	0	pre-development and design cost	
093	700185	A&E, Legal and Consultant Services	1492		0.00	0.00	69,575	0	0	pre-development and design cost	
909	700185	A&E, Legal and Consultant Services	1492		0.00	0.00	106,217	8,733	2,000	pre-development and design cost	
401401	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	11.8	500,000.00	498,250	0	0	0	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations	
901	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	11.8	0.00	700	350	0	0	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations	
910	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	11.8	0.00	1,050	700	0	0	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations	
		Total Professional Services Costs and Fees	1492		1,500,000.00	2,046,738	624,910	162,614			
		Site Acquisition									
		Total Site Acquisition Costs	1492		0.00	0	0	0	0		

Annual Statement of Performance and Evaluation Report										
Capital Fund Program (CPP)										
Part II: Supporting Pages										
PHA Name	Grant Type and Number									
Philadelphia Housing Authority	Capital Fund Program Grant No: FA26900250115									
Development Number / Name HA-Wide Activities	Line Item #	General Description of Major Work Categories	Developer Acct No.	Quantity	Total Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments
015	Harrison Plaza	PHA-Wide Site Improvements								
		Comprehensive Building Renovation	1492	Varies	4,000,000.00		0	0	0	0 Major Building Envelope Repairs at Harrison Plaza
401401	Housing Operations	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies	280,000.00	276,545	0	0	0	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations
902	Mantua	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies	0.00	3,455	3,455	3,455	3,455	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations
013	Wilson Park	HVAC Upgrades	1492	11.5	0.00	75,000	75,000	62,209	0	Chimney Repair for Hi-Rise Senior Bldg
031	BRIKRAM Village	Asphalt/Paving	1492	11.5	0.00	25,665	25,665	25,665	25,665	General Repaving of Site Roadways as needed
		Total PHA-Wide Site Improvements			4,280,000.00	380,665.00	380,665.00	91,329.00	29,120.00	
		Total Site Improvements	1492		4,280,000.00		380,665	91,329	29,120	
		PHA Wide Dwelling Structures								
039	West Park Apts	Elevator Repairs	1492	11.5	0.00	0	0	0	0	Replace Elevator System in all 3 High Rises at West Park Apartments
029	Hill Creek	Roof Repair/Replacement	1492	Varies	526,000.00	526,000	526,000	56,784	0	Replace roofs as needed
063	Katie B. Jackson	Roof Repair/Replacement	1492	Varies	150,000.00	150,000	150,000	0	0	Replace roofs as needed
076	Emlen Arms	Roof Repair/Replacement	1492	Varies	150,000.00	150,000	150,000	0	0	Replace roofs as needed

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part 11: Supporting Pages										
PHA Name:										
Philadelphia Housing Authority										
Capital Fund Program Grant No: PA2600250115										
Grant Type and Number										
Development Number / Name / HA-Wide Activities										
Line Item #										
General Description of Major Work Categories										
Develop Acct No.										
Quantity										
Original										
Revised Budget										
Obligated										
Expended										
Comments										
093	Westport Plaza	701434	Roof Repair/Replacement	1492	Varies	109,000.00	109,000	0	0	Replace roof as needed
020	Spring Garden Apartments	701166	Heating Plant Upgrades	1492	Varies	2,500,000.00	2,500,000	0	0	Upgrade the Primary Site Heating System at Spring Garden Apartments
029	Hill Creek	701166	Heating Plant Upgrades	1492	Varies	2,000,000.00	2,000,000	0	0	Upgrade the Primary Site Heating System at Hill Creek Apartments
065	Collegeview	700878	Plumbing Upgrades	1492	Varies	900,000.00	900,000	897,000	637,544	Replace waste water piping throughout Site
001	Johnson Homes	700878	Plumbing Upgrades	1492	Varies	500,000.00	500,000	0	0	Install/Replace Tub Diverter system throughout units at Mount Olivet LP
138	Mount Olivet LP	700878	Plumbing Upgrades	1492	Varies	500,000.00	500,000	0	0	Install/Replace Tub Diverter system throughout units at Mount Olivet LP
039	West Park Apts	700465	Trash Compactors	1492	3	600,000.00	600,000	0	0	Replace Trash Compactors in the 3 High Rises at West Park Apts
049	Morton Homes	700875	Electrical distribution systems	1492	11 S	0.00	0	0	0	Remove/replace all subpanels; remove/replace main electrical distribution panel; remove/replace existing electrical BMF conductors and cables from
039	Westpark Apts	701078	Doors	1492	11 S	0.00	62,277	0	0	Replace Exterior Steel Doors
055	Fairhill Apts	701078	Doors	1492	11 S	0.00	69,936	0	0	Replace Exterior Steel Doors
001	Johnson Homes	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	664	664	504 Unit Modification/Fair Housing
003	Richard Allen	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing
010	Raymond Rosen	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing
013	Wilton Park	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing

Annual Statement/Performance and Evaluation Report											
Capital Fund Program (CFP)											
Part II: Supporting Pages											
PHA Name:	Grant Type and Number										
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26R00250115										
Development Number / Name IIA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Act No.	Quantity	Total Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments	
014	701098	Norris Apts	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
015	701098	Harrison Plaza	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
018	701098	Arch Homes	1492	Varies	25,000.00	25,000.00	25,000.00	397	397	504 Unit Modification/Fair Housing	
020	701098	Spring Garden Apts	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
029	701098	Hill Crook	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
030	701098	Abbotston	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
031	701098	Bareham Village	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
032	701098	Oxford Village	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
034	701098	Whitetail	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
039	701098	West Park Apts	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
042	701098	Champlott Home	1492	Varies	25,000.00	25,000.00	25,000.00	77	77	504 Unit Modification/Fair Housing	
046	701098	Haverford Homes	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
049	701098	Morton Homes	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
050	701098	Bhumberg	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	

Annual Statement/Performance and Evaluation Report											
Capital Fund Program (CFP)											
Part II: Supporting Pages											
PHA Name:	Grant Type and Number										
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00230115										
Development Number / Name IIA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No	Quantity	Total Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments	
054	701098	Parkview	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
055	701098	Fairhill Apts	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
063	701098	Kahe B. Jackson	1492	Varies	25,000.00	25,000.00	25,000.00	397	397	504 Unit Modification/Fair Housing	
066	701098	Tolmoorest	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
076	701098	Emden Arms	1492	Varies	25,000.00	25,000.00	25,000.00	3,117	151	504 Unit Modification/Fair Housing	
077	701098	Bentley Hall	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
079	701098	Plymouth Hall	1492	Varies	25,000.00	25,000.00	25,000.00	508	0	504 Unit Modification/Fair Housing	
114	701098	Gladys H. Jacobs	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
179	701098	GCPB-1	1492	Varies	0.00	0.00	0.00	434	434	504 Unit Modification/Fair Housing	
901	701098	Scattered Sites	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
902	701098	Scattered Sites	1492	Varies	25,000.00	25,000.00	25,000.00	55,570	54,030	504 Unit Modification/Fair Housing	
903	701098	Scattered Sites	1492	Varies	25,000.00	25,000.00	25,000.00	465	465	504 Unit Modification/Fair Housing	
904	701098	Scattered Sites	1492	Varies	25,000.00	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing	
905	701098	Scattered Sites	1492	Varies	25,000.00	25,000.00	25,000.00	795	795	504 Unit Modification/Fair Housing	

Annual Statement/Performance and Evaluation Report											
Capital Fund Program (CFP)											
Part III: Supporting Pages											
PHA Name:	Grant Type and Number										
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250115										
2015											
Development Number / Name IIA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Revised Budget	Obligated	Expended	Comments		
Original											
906	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	0	0	0	504 Unit Modification/Fair Housing	
907	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	267	267	267	504 Unit Modification/Fair Housing	
908	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	0	0	0	504 Unit Modification/Fair Housing	
909	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	0	0	0	504 Unit Modification/Fair Housing	
910	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	519	519	519	504 Unit Modification/Fair Housing	
		Total PHA-Wide Dwelling Unit Improvements			8,815,000.00	8,947,213	996,994	695,738			
		Scattered Sites Dwelling Unit Renovation									
901	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	100,000	0	0	0	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms	
902	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	100,000	589	589	589	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms	
903	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	582,054	0	0	0	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms	
904	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	600,000	0	0	0	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms	

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:	Grant Type and Number									
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250115									
2015										
Development Number / Name IIA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments
985	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	600,000.00	600,000	185	0	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
986	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	630,676	600,000	252,169	209,058	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
987	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	600,000	600,000	0	0	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
988	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	600,000	600,000	5,890	4,040	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
989	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	1,344,379	600,000	326,895	275,658	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
910	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	842,891	600,000	508,457	495,044	Major interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
401401	701309	Comprehensive Unit MOD	1492	Varies	0.00	170,000	0	0	0	Scattered Sites Modernization Program

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:	Grant Type and Number									
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26R00250115									
2015										
Development Number / Name IIA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost Original	Revised Budget	Obligated	Expended	Comments	
901	701309	Comprehensive Unit MOD	1492	Varies	0.00	540,000	456,425	174,411	Scattered Sites Modernization Program	
902	701309	Comprehensive Unit MOD	1492	Varies	0.00	320,000	272,658	112,367	Scattered Sites Modernization Program	
903	701309	Comprehensive Unit MOD	1492	Varies	0.00	428,000	392,676	193,506	Scattered Sites Modernization Program	
904	701309	Comprehensive Unit MOD	1492	Varies	0.00	523,000	487,107	175,401	Scattered Sites Modernization Program	
905	701309	Comprehensive Unit MOD	1492	Varies	0.00	641,762	641,762	0	Scattered Sites Modernization Program	
907	701309	Comprehensive Unit MOD	1492	Varies	0.00	662,000	595,437	387	Scattered Sites Modernization Program	
908	701309	Comprehensive Unit MOD	1492	Varies	0.00	653,917	564,448	139,639	Scattered Sites Modernization Program	

Annual Statement Performance and Evaluation Report											
Capital Fund Program (CFP)											
Part II: Supporting Pages											
PHA Name:	Grant Type and Number										
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00240115										
Development Number Name IIA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost:	Original	Revised Budget	Obligated	Expended	Comments	2015
910	Oxford Jefferson	Comprehensive Unit MOD	1492	Varies	0.00	0.00	61,321	61,321	0	Scattered Sites Modernization Program	
010	Raymond Rosen	Vacant Unit Rehab Program	1492	Varies	0.00	0.00	4,821	4,821	4,821	Conventional Sites Modernization Program	
013	Wilson Park	Vacant Unit Rehab Program	1492	Varies	0.00	0.00	7,644	7,644	7,644	Conventional Sites Modernization Program	
014	Norris Apt	Vacant Unit Rehab Program	1492	Varies	0.00	0.00	952	952	952	Conventional Sites Modernization Program	
015	Harrison Plaza	Vacant Unit Rehab Program	1492	Varies	0.00	0.00	321	321	321	Conventional Sites Modernization Program	
031	Barram Village	Vacant Unit Rehab Program	1492	Varies	0.00	0.00	525	525	525	Conventional Sites Modernization Program	
032	Oxford Village	Vacant Unit Rehab Program	1492	Varies	0.00	0.00	203	203	203	Conventional Sites Modernization Program	

Annual Statement Performance and Evaluation Report										
Capital Fund Program (CPP)										
Part II: Supporting Pages										
PHIA Name:	Grant Type and Number									
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26F00250115									
Development Number / Name / IA- Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments
034	701431	Vacant Unit Rehab Program	1492	Varies	0.00		700	700	700	Conventional Sites Modernization Program
042	701431	Vacant Unit Rehab Program	1492	Varies	0.00		293	293	293	Conventional Sites Modernization Program
049	701431	Vacant Unit Rehab Program	1492	Varies	0.00		259	259	259	Conventional Sites Modernization Program
055	701431	Vacant Unit Rehab Program	1492	Varies	0.00		826	826	826	Conventional Sites Modernization Program
901	701095	HVAC Upgrades	1492	Varies	100,000.00		73,480	0	0	As needed HVAC upgrades for Scattered Sites
902	701095	HVAC Upgrades	1492	Varies	0.00		3,760	3,760	2,366	As needed HVAC upgrades for Scattered Sites
903	701095	HVAC Upgrades	1492	Varies	0.00		7,520	7,520	6,075	As needed HVAC upgrades for Scattered Sites

Annual Statement/Performance and Evaluation Report											
Capital Fund Program (CFP)											
Part II: Supporting Pages											
PHA Name:	Grant Type and Number										
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250115										
2015											
Development Number Name IFA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments	
905	701095	HVAC Upgrades	1492	Varies	0.00	3,860	3,860	3,860	2,609	As needed HVAC upgrades for Scattered Sites	
906	701095	HVAC Upgrades	1492	Varies	0.00	7,620	7,620	7,620	3,383	As needed HVAC upgrades for Scattered Sites	
908	701095	HVAC Upgrades	1492	Varies	0.00	3,760	3,760	3,760	2,563	As needed HVAC upgrades for Scattered Sites	
902	700291	Exterior Building Structures	1492	Varies	246,610.00	246,610.00	246,610	0	0	Repair Exterior Bays as needed in Scattered Sites	
901	700374	Concrete & Sidewalk Replacement	1492	Varies	0.00	40,000	40,000	40,000	40,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sites	
902	700374	Concrete & Sidewalk Replacement	1492	Varies	0.00	40,000	40,000	40,000	40,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sites	
903	700374	Concrete & Sidewalk Replacement	1492	Varies	0.00	100,000	100,000	100,000	100,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sites	

Annual Statement/Performance and Evaluation Report											
Capital Fund Program (CFP)											
Part II: Supporting Pages											
PHA Name	Grant Type and Number										
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250115										
	2015										
Development Number / Name IIA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Act No.	Quantity	Total Estimated Cost	Original	Revised Budget	Obligated	Expended	Comments	
904	700374	Concrete & Sidewalk Replacement	1492	Varies	0.00	0.00	50,000	50,000	50,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sites	
905	700374	Concrete & Sidewalk Replacement	1492	Varies	0.00	0.00	70,000	70,000	70,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sites	
906	700374	Concrete & Sidewalk Replacement	1492	Varies	0.00	0.00	40,000	40,000	40,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sites	
907	700374	Concrete & Sidewalk Replacement	1492	Varies	0.00	0.00	100,000	100,000	100,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sites	
908	700374	Concrete & Sidewalk Replacement	1492	Varies	0.00	0.00	40,000	40,000	40,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sites	
909	700374	Concrete & Sidewalk Replacement	1492	Varies	0.00	0.00	80,000	80,000	80,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sites	
909	700374	Concrete & Sidewalk Replacement	1492	Varies	600,000.00	600,000.00	40,000	57,729	40,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sites	
				235 units	6,946,600.00	10,963,242.50	5,156,901.35	2,413,344.70	Scattered Site Unit Renovation Total		

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP)											
Part II: Supporting Pages											
PHA Name	Grant Type and Number	Capital Fund Program Grant No.	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Revised Budget	Obligated	Expended	Comments
Development Number / Name PHA-Wide Activities							Original				
Philadelphia Housing Authority		PA26R00250115					15,761,610.00	19,910,455.94	6,153,895.13	3,109,083.17	2015
				Total Dwelling Structures	1492						
				Non-Dwelling Structures	1492						
900154			701507	Non-Dwelling Structures	1492	11.5	2,500,000.00	2,500,000.00	0	0	Construction of Community Center at Lucien Blackwell Home
				Total Non-Dwelling Structures	1492		2,500,000.00	2,500,000.00	0.00	0.00	
				Non-Dwelling Equipment							
707707	Budget		700798	Community Space F & EM	1492	11.5	25,000.00	25,000.00	0	0	As needed replacement of office equipment throughout PHA office and site locations
709709	ISSM		700180	Computer Infrastructure Upgrades, Computer Lab Support, PHA Office and ISSM Support Services	1492	11.5	250,000.00	250,000.00	3,979	2,958	The purchase of 200 replacement computers throughout PHA. Also includes server and network upgrade replacements.
709709	ISSM		700614	Telephone Infrastructure Upgrades	1492	11.5	100,000.00	100,000.00	0	0	Telephone equipments including but not limited to network switches and V.R. upgrades
455455	Housing Operations Specialty Crew		701203	Maintenance Equipment	1492	11.5	100,000.00	100,000.00	0	0	repair replace maintenance equipment including but not limited to landscaping, snow removal and small construction equipment. To be used through out
				Total Non-Dwelling Equipment	1492		475,000.00	475,000.00	3,979	2,958	
401401	Housing Operations		700882	Demolition	1492	11.5	0.00	0	0	0	Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspections
				Total Demolition	1492		0.00	0	0	0	
401401	Housing Operations		700854	Relocation	1492	11.5	0.00	0	29,760	29,760	Relocations as needed through out PHA.

**Annual Statement/Performance and Evaluation Report
Capital Fund Program (CFP) Part I: Summary**

PHA Name: PHILADELPHIA HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: PA26P00250116	Federal FY of Grant: 2016			
Original Annual Statement Performance and Evaluation Report for Program Year Ending: Summary by Development Account		Revised Annual Statement (Revision No: 2) Final Performance and Evaluation Report Total Estimated Cost	Original Budget	Revised Budget	Obligated	Expended
Line No.						
1	Total Non-CFP Funds					
2	1406 Operations				0.00	0.00
3	1408 Management Improvements				0.00	0.00
4	1410 Administrative Costs				1,102,341.88	1,102,341.88
5	1411 Audit				0.00	0.00
6	1415 Liquidated Damages				0.00	0.00
7	1430 Fees and Costs				0.00	0.00
8	1440 Site Acquisition				0.00	0.00
9	1450 Site Improvements				0.00	0.00
10	1460 Dwelling Structures				0.00	0.00
11	1465.1 Dwelling Equipment-Nonexpendable				0.00	0.00
12	1470 Non-Dwelling Space				0.00	0.00
13	1475 Non-Dwelling Equipment				0.00	0.00
14	1485 Demolition				0.00	0.00
15	1490 Replacement Reserve				0.00	0.00
16	1492 Moving to Work Demonstration		30,843,438.00		0.00	0.00
17	1495 Relocation				0.00	0.00
18	1499 Development Activities				0.00	0.00
19	1501 Collateralization or Debt Service				0.00	0.00
20	1502 Contingency				0.00	0.00
21	Amount of Annual Grant (Sum of lines 2-20)					
22	Amount of Line 21 Related to LBP Activities				1,102,341.88	1,102,341.88
23	Amount of Line 21 Related to Section 504 Compliance				0.00	
24	Amount of Line 21 Related to Security - Soft Costs				0.00	
25	Amount of Line 21 Related to Security - Hard Costs					
26	Amount of Line 21 Related to Energy Conservation Measures					
Signature of Executive Director and Date		Signature of Public Housing Director and Date				
Kebbin A. Jerniah, President & Chief Executive Officer						

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:	Grant Type and Number									
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250116									
2016										
Development Number / Name HA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Revised Budget	Obligated	Expended	Comments
					Original					
701701	Finance	701100 Operating Subsidy	1406		0.00	0	0	0		
		Total Operating Subsidy Cost	1406		0.00	0	0	0		
		Management Improvements								
707709	ISM	Computer Software Acquisition, Production Support, Customization, and Program Implementation	1408			0	0	0		PHA wide system support, upgrades, implementations.
		Total Management Improvement Cost	1408		0.00	0	0	0		
		Administrative Costs								
000	PHA-Wide	Administrative Salaries and Benefits	1410		3,827,165.00	0	1,102,342	1,102,342		Administrative Salaries and Benefits
		Total Administrative Cost	1410		3,827,165.00	0	1,102,342	1,102,342		
		Fees and Costs								
800800	Development	A&E, Legal and Consultant Services	1430		1,000,000.00	0	0	0		pre-development and design cost

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:	Grant Type and Number									
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250116									
										2016
Development Number / Name HA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct.No.	Quantity	Total Estimated Cost		Revised Budget	Obligated	Expended	Comments
					Original					
401401	Housing Operations	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430	1 LS		0			To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
			Total Professional Services Costs and Fees	1430		1,000,000.00	0	0	0	
			Site Acquisition							
			Total Site Acquisition Costs	1440		0.00	0	0	0	
			PHA- Wide Site Improvements							
015	Harrison Plaza	700441	Comprehensive Building Renovation	1450	Varies					Major Building Envelope Repairs at Harrison Plaza
401401	Housing Operations	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies		0			Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accommodations.
			Total PHA-Wide Site Improvements			0.00	0	0	0	

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:	Grant Type and Number									
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250116									
Development Number / Name HA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Revised Budget	Obligated	Expended	Comments	2016
		Total Site Improvements	1450		0.00	0				
		PHA Wide Dwelling Structures								
039	701165	Elevator Repairs	1460	1 LS	0.00	0			Replace Elevator System in all 3 High Rises at West Park Apartments	
029	701434	Roof Repair/Replacement	1460	Varies					Replace roofs as needed	
063	701434	Roof Repair/Replacement	1460	Varies					Replace roofs as needed	
076	701434	Roof Repair/Replacement	1460	Varies					Replace roofs as needed	
093	701434	Roof Repair/Replacement	1460	Varies					Replace roofs as needed	
020	701166	Heating Plant Upgrades	1460	Varies					Upgrade the Primary Site Heating System at Spring Garden Apartments	
029	701166	Heating Plant Upgrades	1460	Varies					Upgrade the Primary Site Heating System at Hill Creek Apartments	
065	700878	Plumbing Upgrades	1460	Varies					Replace waste water piping throughout Site	

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part 11: Supporting Pages										
PHA Name:	Grant Type and Number									
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P0250116									
Development Number / Name HA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Revised Budget	Obligated	Expended	Comments	
001	700878	Plumbing Upgrades	1460	Varies					Install/Replace Tub Diverter system through units at Mount Olive LP	
138	700878	Plumbing Upgrades	1460	Varies					Install/Replace Tub Diverter system through units at Mount Olive LP	
039	700465	Trash Compactors	1460	3					Replace Trash Compactors in the 3 High Rises at West Park Apts	
049	700875	Electrical distribution systems	1460	1 LS	0.00	0			Remove/replace all subpanels; remove/replace main electrical distribution panel; remove/replace existing electrical EMT conduit and cable from 504 Unit Modification/Fair Housing	
001	701098	504 Unit Modification/Fair Housing	1460	Varies		0				
003	701098	504 Unit Modification/Fair Housing	1460	Varies		0				
010	701098	504 Unit Modification/Fair Housing	1460	Varies		0				
013	701098	504 Unit Modification/Fair Housing	1460	Varies		0				
014	701098	504 Unit Modification/Fair Housing	1460	Varies		0				
015	701098	504 Unit Modification/Fair Housing	1460	Varies		0				

Annual Statement/Performance and Evaluation Report												
Capital Fund Program (CFP)												
Part II: Supporting Pages												
PHA Name:												
Philadelphia Housing Authority												
Grant Type and Number												
Capital Fund Program Grant No: PA26P00250116												
Development Number / Name HA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Revised Budget	Obligated	Expended	Comments		
					Original	Expended						
018	Arch Homes	504 Unit Modification/Fair Housing	1460	Varies			0			504 Unit Modification/Fair Housing		
020	Soring Garden Apts	504 Unit Modification/Fair Housing	1460	Varies			0			504 Unit Modification/Fair Housing		
029	Hill Creek	504 Unit Modification/Fair Housing	1460	Varies			0			504 Unit Modification/Fair Housing		
030	Abbotsford	504 Unit Modification/Fair Housing	1460	Varies			0			504 Unit Modification/Fair Housing		
031	Barram Village	504 Unit Modification/Fair Housing	1460	Varies			0			504 Unit Modification/Fair Housing		
032	Oxford Village	504 Unit Modification/Fair Housing	1460	Varies			0			504 Unit Modification/Fair Housing		
034	Whitehall	504 Unit Modification/Fair Housing	1460	Varies			0			504 Unit Modification/Fair Housing		
039	West Park Apts	504 Unit Modification/Fair Housing	1460	Varies			0			504 Unit Modification/Fair Housing		
042	Champlost Home	504 Unit Modification/Fair Housing	1460	Varies			0			504 Unit Modification/Fair Housing		
046	Haoverford Homes	504 Unit Modification/Fair Housing	1460	Varies			0			504 Unit Modification/Fair Housing		

Annual Statement/Performance and Evaluation Report											
Capital Fund Program (CRP)											
Part II: Supporting Pages											
PHA Name:	Grant Type and Number										
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250116										
Development Number / Name HA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Revised Budget		Comments			
						Obligated	Expended				
049	701098	504 Unit Modification/Fair Housing	1460	Varies	0	0	504 Unit Modification/Fair Housing				
050	701098	504 Unit Modification/Fair Housing	1460	Varies	0	0	504 Unit Modification/Fair Housing				
054	701098	504 Unit Modification/Fair Housing	1460	Varies	0	0	504 Unit Modification/Fair Housing				
055	701098	504 Unit Modification/Fair Housing	1460	Varies	0	0	504 Unit Modification/Fair Housing				
063	701098	504 Unit Modification/Fair Housing	1460	Varies	0	0	504 Unit Modification/Fair Housing				
066	701098	504 Unit Modification/Fair Housing	1460	Varies	0	0	504 Unit Modification/Fair Housing				
076	701098	504 Unit Modification/Fair Housing	1460	Varies	0	0	504 Unit Modification/Fair Housing				
077	701098	504 Unit Modification/Fair Housing	1460	Varies	0	0	504 Unit Modification/Fair Housing				
079	701098	504 Unit Modification/Fair Housing	1460	Varies	0	0	504 Unit Modification/Fair Housing				
114	701098	504 Unit Modification/Fair Housing	1460	Varies	0	0	504 Unit Modification/Fair Housing				

Annual Statement/Performance and Evaluation Report											
Capital Fund Program (CFP)											
Part II: Supporting Pages											
PHA Name:											
Philadelphia Housing Authority											
Grant Type and Number											
Capital Fund Program Grant No: PA26P00250116											
2016											
Development Number / Name HA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Revised Budget	Obligated	Expended	Comments	
					Original						
901	Scattered Sites	701098	504 Unit Modification/Fair Housing	1460	Varies		0			504 Unit Modification/Fair Housing	
902	Scattered Sites	701098	504 Unit Modification/Fair Housing	1460	Varies		0			504 Unit Modification/Fair Housing	
903	Scattered Sites	701098	504 Unit Modification/Fair Housing	1460	Varies		0			504 Unit Modification/Fair Housing	
904	Scattered Sites	701098	504 Unit Modification/Fair Housing	1460	Varies		0			504 Unit Modification/Fair Housing	
905	Scattered Sites	701098	504 Unit Modification/Fair Housing	1460	Varies		0			504 Unit Modification/Fair Housing	
906	Scattered Sites	701098	504 Unit Modification/Fair Housing	1460	Varies		0			504 Unit Modification/Fair Housing	
907	Scattered Sites	701098	504 Unit Modification/Fair Housing	1460	Varies		0			504 Unit Modification/Fair Housing	
908	Scattered Sites	701098	504 Unit Modification/Fair Housing	1460	Varies		0			504 Unit Modification/Fair Housing	
909	Scattered Sites	701098	504 Unit Modification/Fair Housing	1460	Varies		0			504 Unit Modification/Fair Housing	
910	Scattered Sites	701098	504 Unit Modification/Fair Housing	1460	Varies		0			504 Unit Modification/Fair Housing	

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:										
Philadelphia Housing Authority										
Grant Type and Number										
Capital Fund Program Grant No: PA26P00230116										
2016										
Development Number / Name HA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Revised Budget	Obligated	Expended	Comments
					Original					
		Total PHA-Wide Dwelling Unit Improvements				0.00	0	0	0	
		Scattered Sites Dwelling Unit Renovation								
901	Haddington	Comprehensive Scattered Sites Unit Rehab	1460	Varies		600,000.00	0	0	0	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
902	Mantua	Comprehensive Scattered Sites Unit Rehab	1460	Varies		600,000.00	0			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
903	Kingessing	Comprehensive Scattered Sites Unit Rehab	1460	Varies		600,000.00	0			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
904	Germaantown/Hunting Park	Comprehensive Scattered Sites Unit Rehab	1460	Varies		600,000.00	0			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:										
Philadelphia Housing Authority										
Capital Fund Program Grant No: PA26P00250116										
Grant Type and Number										
Development Number / Name										
HA-Wide Activities										
Line Item #										
General Description of Major Work Categories										
Develop Act No.										
Quantity										
Total Estimated Cost										
Original										
Revised Budget										
Obligated										
Expended										
Comments										
905	Fairhill Square	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000.00	0			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
906	Francisville	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000.00	0			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
907	Ludlow	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000.00	0			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
908	Susquehanna	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000.00	0			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
909	Strawberry Mansion	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000.00	0			Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms

Annual Statement/Performance and Evaluation Report										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
PHA Name:	Grant Type and Number									
Philadelphia Housing Authority	Capital Fund Program Grant No: PA20P00250116									
2016										
Development Number - Name HA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost Original	Revised Budget	Obligated	Expended	Comments	
		Non-Dwelling Structures	1470							
900130 Lucien Blackwell LP	701507	Non-Dwelling Structures	1470	1 LS					Construction of Community Center at Lucien Blackwell Home	
		Total Non-Dwelling Structures	1470		0.00					
		Non-Dwelling Equipment								
707707 Budget	700798	Community Space F & EM	1475	1 LS	25,000.00	0			As needed replacement of office equipment throughout PHA office and site locations	
709709 ISM	700180	Computer Infrastructure Upgrades, Computer Lab Support, PHA Office and ISM Support Services	1475	1 LS	250,000.00	0			The purchase of 2000 replacement computers throughout PHA. Also includes server and network upgrades/replacements.	
709709 ISM	700614	Telephone Infrastructure Upgrades	1475	1 LS	100,000.00	0			Telephone equipments including but not limited to network switches and IVR upgrades	
455455 Housing Operations Specialty Crew	701203	Maintenance Equipment	1475	1 LS	100,000.00	0			repair/replace maintenance equipment including but not limited to landscaping, snow removal and small construction equipment. To be used through	
		Total Non-Dwelling Equipment	1475		475,000.00	0	0	0		

Annual Statement/Performance and Evaluation Report											
Capital Fund Program (CFP)											
Part II: Supporting Pages											
PHA Name:	Grant Type and Number	Capital Fund Program Grant No:	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Revised Budget	Obligated	Expended	Comments
Philadelphia Housing Authority	PA26P00250116						Original				
401401	Housing Operations		700882	Demolition	1485	1 LS	0.00	0	0	0	Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspectors
				Total Demolition	1485		0.00	0	0	0	
707707	Budget Office		700156	Evaluate Strategic Plan	1492	Various	19,541,273.00				Funding for Capital Projects To Be Determined
				Total NITW Demonstration	1492		19,541,273.00				
401401	Housing Operations		700854	Relocation	1495	1 LS	0.00	0	0	0	Relocations as needed through out PHA.
				Total Relocation	1495		0.00	0	0	0	
				Total Development	1499		0.00	0	0	0	
700700	Finance		701491	Bond Debt Service - Principle	1501	1 LS	5,070,000.00				bond debt principle payment for Tasker Bond

Annual Statement/Performance and Evaluation Report											
Capital Fund Program (CFP)											
Part II: Supporting Pages											
PHA Name:	Grant Type and Number										
Philadelphia Housing Authority	Capital Fund Program Grant No: PA26P00250116										
Development Number / Name HA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost	Revised Budget	Obligated	Expended	Comments		
					Original						
700700 Finance	701498	Bond Debt Service - Interest	1501	1 LS	2,358,212.00	0	0	0	bond debt interest payment for Tasker Bond		
		Total Debt Service	1501		7,428,212.00	0	0	0			
		GRAND TOTAL			38,271,650.00	0	1,102,342	1,102,342			

Annual Statement/Performance and Evaluation Report Capital Fund Program (CFP) Part I: Summary

PHA Name: PHILADELPHIA HOUSING AUTHORITY		Grant Type and Number Replacement Housing Fund Program Grant No: PA26R00250112	Federal FY of Grant: 2012
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies Performance and Evaluation Report for Program Year Ending:		<input type="checkbox"/> Revised Annual Statement (Revision No: 2) <input type="checkbox"/> Final Performance and Evaluation Report	
Line No.	Summary by Development Account	Total Estimated Cost	
		Original	Revised
		Obligated	Expended
		Total Actual Cost	
1	Total Non-CFP Funds	0	0
2	1406 Operations	0	0
3	1408 Management Improvements	0	0
4	1410 Administrative Costs	0	0
5	1411 Audit	0	0
6	1415 Liquidated Damages	0	0
7	1430 Fees and Costs	0	0
8	1440 Site Acquisition	0	0
9	1450 Site Improvements	0	0
10	1460 Dwelling Structures	0	0
11	1465.1 Dwelling Equipment-Nonexpendable	0	0
12	1470 Non-Dwelling Space	0	0
13	1475 Non-Dwelling Equipment	0	0
14	1485 Demolition	0	0
15	1490 Replacement Reserve	0	0
16	1492 Moving to Work Demonstration	0	0
17	1495 Relocation	0	0
18	1499 Development Activities	3,409,555	3,117,510
19	1501 Collateralization or Debt Service	3,409,555	3,140,939
20	1502 Contingency		
21	Amount of Annual Grant (Sum of lines 2-20)	3,409,555	3,140,939
22	Amount of Line 21 Related to LBP Activities		
23	Amount of Line 21 Related to Section 504 Compliance		
24	Amount of Line 21 Related to Security - Soft Costs		
25	Amount of Line 21 Related to Security - Hard Costs		
26	Amount of Line 21 Related to Energy Conservation Measures		

**Annual Statement/Performance and Evaluation Report
Capital Fund Program (CFP)
Part II: Supporting Pages**

PHA Name:		Grant Type and Number		Replacement Housing Fund Program Grant No:		2012				
Philadelphia Housing Authority		PA26R00250112		PA26R00250112						
Development Number / Name Activities	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work Comments
						Original	Revised	Obligated	Expended	
024	Queen Lane Apartments	701497	Replacement Housing	1499	Various	0	3,409,555.00	3,086,523.66	208,192.66	New Construction of the Queen Lane Development
902	Mantua	701490	New Development	1499	55 units	0	0	0	0	New construction of infill housing units
003	Richard Allen Vacant Land Development & Spring Garden School	701490	New Development	1499	TBD	3,409,555.00	0	0	0	Planned development of senior housing.
			Total New Development			3,409,555.00	3,409,555.00	3,086,523.66	208,192.66	
			Total Construction			0	0	0	0	
			New Development			3,409,555.00	3,409,555.00	3,086,523.66	208,192.66	
			Total Proposed Replacement Housing Fund Activities			3,409,555.00				

Annual Statement/Performance and Evaluation Report Capital Fund Program (CFP) Part I: Summary

PHA Name: PHILADELPHIA HOUSING AUTHORITY		Grant Type and Number Replacement Housing Fund Program Grant No: PA26R00250113		Federal FY of Grant: 2013		
<input checked="" type="checkbox"/> Original Annual Statement Performance and Evaluation Report for Program Year Ending: <input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (Revision No:)				
<input type="checkbox"/> Performance and Evaluation Report for Program Year Ending:		<input type="checkbox"/> Final Performance and Evaluation Report				
Line No.	Summary by Development Account	Total Estimated Cost			Total Actual Cost	
		Original	Revised	Obligated	Expended	
1	Total Non-CFP Funds	0		0	0	0
2	1406 Operations	0				
3	1408 Management Improvements	0				
4	1410 Administrative Costs	0				
5	1411 Audit	0				
6	1415 Liquidated Damages	0				
7	1430 Fees and Costs	0	831,633	831,633		236,401
8	1440 Site Acquisition	0				
9	1450 Site Improvements	0			0	0
10	1460 Dwelling Structures	0		0	0	0
11	1465.1 Dwelling Equipment-Nonexpendable	0				
12	1470 Non-Dwelling Space	0			0	0
13	1475 Non-Dwelling Equipment	0				
14	1485 Demolition	0			0	0
15	1490 Replacement Reserve	0				
16	1492 Moving to Work Demonstration	0				
17	1495 Relocation	0				
18	1499 Development Activities	3,193,355	3,193,355	4,024,988		831,633
19	1501 Collateralization or Debt Service					
20	1502 Contingency					
21	Amount of Annual Grant (Sum of lines 2-20)	3,193,355	4,024,988			1,068,034
22	Amount of Line 21 Related to LBP Activities					
23	Amount of Line 21 Related to Section 504 Compliance					
24	Amount of Line 21 Related to Security - Soft Costs					
25	Amount of Line 21 Related to Security - Hard Costs					
26	Amount of Line 21 Related to Energy Conservation Measures					

**Annual Statement/Performance and Evaluation Report
Capital Fund Program (CFP)
Part II: Supporting Pages**

PHA Name:		Grant Type and Number									
Philadelphia Housing Authority		Replacement Housing Fund Program Grant No: PA26R00250113									
		2013									
Development Number / Name Activities	Line Item #	HA-Wide	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost			Total Actual Cost		Status of Work
						Original	Revised		Obligated	Expended	
014	Norris Apartments	700185	A & E Services	1430	1 LS	0	831,633	831,633	831,633	236,401	New construction of infill housing units @ Norris Apartments
000	Development	701490	New Development	1499	TBD	0	991,633	0	0	0	New Construction TBD
909	Strawberry Mansion	701490	New Development	1499	1 LS	0	2,201,722	0	0	0	Planned Development of Strawberry Mansion Apts.
003	Richard Allen Vacant Land Development & Spring Garden School	701490	New Development	1499	TBD	4,024,988	0	0	0	0	Planned development of senior housing.
			Total Construction				3,193,355	4,024,988	4,024,988	831,633	
						0	0	0	0	0	0
						0	0	0	0	0	
			Total Proposed Replacement Housing Fund Activities			4,024,988	4,024,988	831,633	831,633	236,401	

Annual Statement/Performance and Evaluation Report Capital Fund Program (CFP) Part I: Summary

PHA Name: PHILADELPHIA HOUSING AUTHORITY		Grant Type and Number Replacement Housing Fund Program Grant No: PA26R00250114		Federal FY of Grant: 2014	
<input checked="" type="checkbox"/> Original Annual Statement Performance and Evaluation Report for Program Year Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (Revision No:)	
<input type="checkbox"/> Summary by Development Account		<input type="checkbox"/> Final Performance and Evaluation Report		Total Actual Cost	
Line No.	Description	Original	Revised	Obligated	Expended
1	Total Non-CFP Funds	0		0	0
2	1406 Operations	0			
3	1408 Management Improvements	0			
4	1410 Administrative Costs	0			
5	1411 Audit	0			
6	1415 Liquidated Damages	0			
7	1430 Fees and Costs	0		0	0
8	1440 Site Acquisition	0			
9	1450 Site Improvements	0		0	0
10	1460 Dwelling Structures	0		0	0
11	1465.1 Dwelling Equipment-Nonexpendable	0			
12	1470 Non-Dwelling Space	0		0	0
13	1475 Non-Dwelling Equipment	0			
14	1485 Demolition	0		0	0
15	1490 Replacement Reserve	0			
16	1492 Moving to Work Demonstration	0			
17	1495 Relocation	0			
18	1499 Development Activities	3,961,127		0	0
19	1501 Collateralization or Debt Service				
20	1502 Contingency				
21	Amount of Annual Grant (Sum of lines 2-20)	3,961,127		0	0
22	Amount of Line 21 Related to LBP Activities				
23	Amount of Line 21 Related to Section 504 Compliance				
24	Amount of Line 21 Related to Security - Soft Costs				
25	Amount of Line 21 Related to Security - Hard Costs				
26	Amount of Line 21 Related to Energy Conservation Measures				

Annual Statement/Performance and Evaluation Report
Capital Fund Program (CFP)
Part II: Supporting Pages

PHA Name:		Grant Type and Number									
Philadelphia Housing Authority		Replacement Housing Fund Program Grant No: PA26R00250114									
		2014									
Development Number / Name	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	Comments
						Original	Revised	Obligated	Expended		
902	Mantua	701490	New Development - Blumberg	1499	TBD	3,961,127	0	0	0	New construction and Revitalization of the Blumberg Development	
			Total New Development			3,961,127	0	0	0		
			Total Construction			0	0	0	0		
			New Development			3,961,127	0	0	0		
			Total Proposed Replacement Housing Fund Activities			3,961,127	0	0	0		

Annual Statement/Performance and Evaluation Report Capital Fund Program (CFP) Part I: Summary

PHA Name: PHILADELPHIA HOUSING AUTHORITY
 Grant Type and Number: Replacement Housing Fund Program Grant No: PA26R00250115
 Federal FY of Grant: 2015

Original Annual Statement Reserve for Disasters/Emergencies
 Performance and Evaluation Report for Program Year Ending: _____
 Revised Annual Statement (Revision No:)
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost			Total Actual Cost	
		Original	Revised	Obligated	Expended	
1	Total Non-CFP Funds	0		0	0	
2	1406 Operations	0				
3	1408 Management Improvements	0				
4	1410 Administrative Costs	0				
5	1411 Audit	0				
6	1415 Liquidated Damages	0				
7	1430 Fees and Costs	0				
8	1440 Site Acquisition	0		0	0	
9	1450 Site Improvements	0				
10	1460 Dwelling Structures	0		0	0	
11	1465.1 Dwelling Equipment-Nonexpendable	0				
12	1470 Non-Dwelling Space	0				
13	1475 Non-Dwelling Equipment	0				
14	1485 Demolition	0		0	0	
15	1490 Replacement Reserve	0				
16	1492 Moving to Work Demonstration	0				
17	1495 Relocation	0				
18	1499 Development Activities	3,192,399	0	0	0	
19	1501 Collateralization or Debt Service					
20	1502 Contingency					
21	Amount of Annual Grant (Sum of lines 2-20)	3,192,399	0	0	0	
22	Amount of Line 21 Related to LBP Activities					
23	Amount of Line 21 Related to Section 504 Compliance					
24	Amount of Line 21 Related to Security - Soft Costs					
25	Amount of Line 21 Related to Security - Hard Costs					
26	Amount of Line 21 Related to Energy Conservation Measures					

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Capital Fund Program (CFP)
Part II: Supporting Pages

PHA Name:		Grant Type and Number									
Philadelphia Housing Authority		Replacement Housing Fund Program Grant No: PA26R00250115									
		2015									
Development Number / Name	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	Comments
						Original	Revised	Obligated	Expended		
050	Blumberg	701490	New Development - Blumberg	1499	TBD	3,192,399	0	0	0	0	New construction and Revitalization of the Blumberg Development
			Total New Development			3,192,399	0	0	0	0	
			Total Construction			0	0	0	0	0	
			New Development			3,192,399	0	0	0	0	
			Total Proposed Replacement Housing Fund Activities			3,192,399					

Annual Statement/Performance and Evaluation Report Capital Fund Program (CFP) Part I: Summary

PHA Name: PHILADELPHIA HOUSING AUTHORITY		Grant Type and Number Replacement Housing Fund Program Grant No: PA26R00250116		Federal FY of Grant: 2016
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies Performance and Evaluation Report for Program Year Ending:		<input type="checkbox"/> Revised Annual Statement (Revision No:) <input type="checkbox"/> Final Performance and Evaluation Report		
Line No.	Summary by Development Account	Total Estimated Cost		
		Original	Revised	Obligated
1	Total Non-CFP Funds	0		0
2	1406 Operations	0		
3	1408 Management Improvements	0		
4	1410 Administrative Costs	0		
5	1411 Audit	0		
6	1415 Liquidated Damages	0		
7	1430 Fees and Costs	0		0
8	1440 Site Acquisition	0		
9	1450 Site Improvements	0		0
10	1460 Dwelling Structures	0		0
11	1465.1 Dwelling Equipment-Nonexpendable	0		
12	1470 Non-Dwelling Space	0		0
13	1475 Non-Dwelling Equipment	0		
14	1485 Demolition	0		0
15	1490 Replacement Reserve	0		
16	1492 Moving to Work Demonstration	0		
17	1495 Relocation	0		
18	1499 Development Activities	2,622,235		0
19	1501 Collateralization or Debt Service			
20	1502 Contingency			
21	Amount of Annual Grant (Sum of lines 2-20)	2,622,235		0
22	Amount of Line 21 Related to LBP Activities			
23	Amount of Line 21 Related to Section 504 Compliance			
24	Amount of Line 21 Related to Security - Soft Costs			
25	Amount of Line 21 Related to Security - Hard Costs			
26	Amount of Line 21 Related to Energy Conservation Measures			

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Capital Fund Program (CFP)
Part II: Supporting Pages

PHA Name:		Grant Type and Number									
Philadelphia Housing Authority		Replacement Housing Fund Program Grant No: PA26R00250116									
		2016									
Development Number / Name	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	Comments
						Original	Revised	Obligated	Expended		
050	Blumberg	701490	New Development - Blumberg	1499	TBD	2,622,235	0	0	0		New construction and Revitalization of the Blumberg Development
			Total New Development			2,622,235	0	0	0		
			Total Construction			0	0	0	0		
			New Development			2,622,235	0	0	0		
			Total Proposed Replacement Housing Fund Activities			2,622,235					

Annual Statement/Performance and Evaluation Report Capital Fund Program (CFP) Part I: Summary

PHA Name: PHILADELPHIA HOUSING AUTHORITY		Grant Type and Number Replacement Housing Fund Program Grant No: PA26R00250212	Federal FY of Grant: 2012	
<input checked="" type="checkbox"/> Original Annual Statement Performance and Evaluation Report for Program Year 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 No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost
		Original	Revised	Obligated
1	Total Non-CFP Funds	0		0
2	1406 Operations	0		
3	1408 Management Improvements	0		
4	1410 Administrative Costs	0		
5	1411 Audit	0		
6	1415 Liquidated Damages	0		
7	1430 Fees and Costs	0		
8	1440 Site Acquisition	0		0
9	1450 Site Improvements	0		
10	1460 Dwelling Structures	0	0	0
11	1465.1 Dwelling Equipment-Nonexpendable	0		
12	1470 Non-Dwelling Space	0		0
13	1475 Non-Dwelling Equipment	0		
14	1485 Demolition	0	2,000,744	2,000,744
15	1490 Replacement Reserve	0		
16	1492 Moving to Work Demonstration	0		
17	1495 Relocation	0		
18	1499 Development Activities	4,573,883	3,180,230	3,180,230
19	1501 Collateralization or Debt Service			
20	1502 Contingency			
21	Amount of Annual Grant (Sum of lines 2-20)	4,573,883	5,180,974	5,180,974
22	Amount of Line 21 Related to LBP Activities			
23	Amount of Line 21 Related to Section 504 Compliance			
24	Amount of Line 21 Related to Security - Soft Costs			
25	Amount of Line 21 Related to Security - Hard Costs			
26	Amount of Line 21 Related to Energy Conservation Measures			

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Capital Fund Program (CFP)

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PHA Name:		Grant Type and Number									
Philadelphia Housing Authority		Replacement Housing Fund Program Grant No: PA26R00250212									
		2012									
Development Number / Name / Wide Activities	Line Item #	HA-	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost			Total Actual Cost		Status of Work
						Original	Revised	Obligated	Expended	Comments	
050 Blumberg Development	700882		Demolition	1485	Various	0	2,000,744.00	2,000,744.00	0	0	Demolition Costs Related to the Blumberg Revitalization
			Total Demolition			0	2,000,744.00	2,000,744.00	0	0	
024 Queen Lane Development	701497		New Development	1499	Various	0	3,180,230.00	3,180,230.00	0	0	New Construction of the Queen Lane Development
904-2800 Block of Oakdale Street 909 Planning	701490		New Development	1499	50 units	3,000,000.00	-	0	0	0	Comprehensive rehabilitation and new development of 25 units on the 2700 Block of Oakdale Street and construction of 25 units in area between 32nd through 33rd Streets and Berks Street to Norris Street.
902 Mantua	701490		New Development	1499	55 units	1,573,883.23	-	0	0	0	New construction of infill housing units
			Total New Development			4,573,883.23	3,180,230.00	3,180,230.00	3,180,230.00	3,180,230.00	
			Total Construction			-	-	-	0	0	
			New Development			4,573,883.23	3,180,230.00	3,180,230.00	3,180,230.00	3,180,230.00	
			Total Proposed Replacement Housing Fund Activities			4,573,883.23	5,180,974.00	5,180,974.00	3,180,230.00	3,180,230.00	

Annual Statement/Performance and Evaluation Report Capital Fund Program (CFP) Part I: Summary

PHA Name: PHILADELPHIA HOUSING AUTHORITY
 Grant Type and Number: Replacement Housing Fund Program Grant No: PA26R00250212
 Federal FY of Grant: 2013

Line No.	Original Annual Statement Performance and Evaluation Report for Program Year Ending: Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total Non-CFP Funds	0		0	0
2	1406 Operations	0			0
3	1408 Management Improvements	0			
4	1410 Administrative Costs	0			
5	1411 Audit	0			
6	1415 Liquidated Damages	0			
7	1430 Fees and Costs	0		0	0
8	1440 Site Acquisition	0			0
9	1450 Site Improvements	0			0
10	1460 Dwelling Structures	0		0	0
11	1465.1 Dwelling Equipment-Nonexpendable	0		0	0
12	1470 Non-Dwelling Space	0			
13	1475 Non-Dwelling Equipment	0			0
14	1485 Demolition	0			0
15	1490 Replacement Reserve	0			
16	1492 Moving to Work Demonstration	0			
17	1495 Relocation	0			
18	1499 Development Activities	7,707,910		0	0
19	1501 Collateralization or Debt Service				
20	1502 Contingency				
21	Amount of Annual Grant (Sum of lines 2-20)	7,707,910		0	0
22	Amount of Line 21 Related to LBP Activities				
23	Amount of Line 21 Related to Section 504 Compliance				
24	Amount of Line 21 Related to Security - Soft Costs				
25	Amount of Line 21 Related to Security - Hard Costs				
26	Amount of Line 21 Related to Energy Conservation Measures				

Original Annual Statement
 Reserve for Disasters/Emergencies
 Revised Annual Statement (Revision No:)
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**Annual Statement/Performance and Evaluation Report
Capital Fund Program (CFP)
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PHA Name:		Grant Type and Number		Replacement Housing Fund Program Grant No:		PA26R00250212		2013	
Philadelphia Housing Authority		Replacement Housing Fund Program Grant No:		PA26R00250212					
Development Number / Name / HA-Wide Activities	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
					Original	Revised	Obligated	Expended	Comments
904-2800 Block of Oakdale Street 909 Planning	701490	New Development	1499	VARIOUS	7,707,910		0	0	Comprehensive rehabilitation of Scattered Sites units throughout the Authority's inventory
902 Mantua	701490	New Development	1499				0	0	
		Total New Development			7,707,910	0	0	0	
		Total Construction			0	0	0	0	
		New Development			7,707,910	0	0	0	
		Total Proposed Replacement Housing Fund Activities			7,707,910	0	0	0	

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PHA Name: PHILADELPHIA HOUSING AUTHORITY		Grant Type and Number Replacement Housing Fund Program Grant No: PA26R00250214	Federal FY of Grant: 2014		
<input checked="" type="checkbox"/> Original Annual Statement Performance and Evaluation Report for Program Year Ending: <input type="checkbox"/> Reserve for Disasters/Emergencies Performance and Evaluation Report for Program Year Ending: Summary by Development Account		<input type="checkbox"/> Revised Annual Statement (Revision No:) <input type="checkbox"/> Final Performance and Evaluation Report			
Line No.	Description	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total Non-CFP Funds	0		0	0
2	1406 Operations	0			
3	1408 Management Improvements	0			
4	1410 Administrative Costs	0			
5	1411 Audit	0			
6	1415 Liquidated Damages	0			
7	1430 Fees and Costs	0		0	0
8	1440 Site Acquisition	0			
9	1450 Site Improvements	0		0	0
10	1460 Dwelling Structures	0		0	0
11	1465.1 Dwelling Equipment-Nonexpendable	0			
12	1470 Non-Dwelling Space	0		0	0
13	1475 Non-Dwelling Equipment	0			
14	1485 Demolition	0		0	0
15	1490 Replacement Reserve	0			
16	1492 Moving to Work Demonstration	0			
17	1495 Relocation	0			
18	1499 Development Activities	5,307,496		0	0
19	1501 Collateralization or Debt Service				
20	1502 Contingency				
21	Amount of Annual Grant (Sum of lines 2-20)	5,307,496		0	0
22	Amount of Line 21 Related to LBP Activities				
23	Amount of Line 21 Related to Section 504 Compliance				
24	Amount of Line 21 Related to Security - Soft Costs				
25	Amount of Line 21 Related to Security - Hard Costs				
26	Amount of Line 21 Related to Energy Conservation Measures				

Annual Statement/Performance and Evaluation Report
Capital Fund Program (CFP)
Part II: Supporting Pages

PHA Name:		Grant Type and Number									
Philadelphia Housing Authority		Replacement Housing Fund Program Grant No: PA26R00250214									
		2014									
Development Number / Name	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost			Total Actual Cost		Status of Work
						Original	Revised		Obligated	Expended	
902		701490	New Development - Blumberg	1499	TBD	5,307,496	0	0	0	0	New construction and Revitalization of the Blumberg Development
			Total New Development			5,307,496	0	0	0	0	
			Total Construction			0	0	0	0	0	
			New Development			5,307,496	0	0	0	0	
			Total Proposed Replacement Housing Fund Activities			5,307,496	0	0	0	0	

Annual Statement/Performance and Evaluation Report Capital Fund Program (CFP) Part I: Summary

PHA Name: PHILADELPHIA HOUSING AUTHORITY		Grant Type and Number Replacement Housing Fund Program Grant No: PA26R00250215	Federal FY of Grant: 2015	
<input checked="" type="checkbox"/> Original Annual Statement Performance and Evaluation Report for Program Year 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 No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost
		Original	Revised	Obligated
1	Total Non-CFP Funds	0		0
2	1406 Operations	0		
3	1408 Management Improvements	0		
4	1410 Administrative Costs	0		
5	1411 Audit	0		
6	1415 Liquidated Damages	0		
7	1430 Fees and Costs	0		0
8	1440 Site Acquisition	0		
9	1450 Site Improvements	0		0
10	1460 Dwelling Structures	0		0
11	1465.1 Dwelling Equipment-Nonexpendable	0		
12	1470 Non-Dwelling Space	0		0
13	1475 Non-Dwelling Equipment	0		
14	1485 Demolition	0		0
15	1490 Replacement Reserve	0		
16	1492 Moving to Work Demonstration	0		
17	1495 Relocation	0		
18	1499 Development Activities	2,969,371	0	0
19	1501 Collateralization or Debt Service			
20	1502 Contingency			
21	Amount of Annual Grant (Sum of lines 2-20)	2,969,371	0	0
22	Amount of Line 21 Related to LBP Activities			
23	Amount of Line 21 Related to Section 504 Compliance			
24	Amount of Line 21 Related to Security - Soft Costs			
25	Amount of Line 21 Related to Security - Hard Costs			
26	Amount of Line 21 Related to Energy Conservation Measures			

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Capital Fund Program (CFP)
Part II: Supporting Pages**

PHA Name:		Grant Type and Number									
Philadelphia Housing Authority		Replacement Housing Fund Program Grant No: PA26R00250215									
		2015									
Development Number / Name Activities	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	
						Original	Revised	Obligated	Expended	Comments	
050	Blumberg	701490	New Development - Blumberg	1499	TBD	2,969,371	0	0	0	0	New construction and Revitalization of the Blumberg Development
			Total New Development			2,969,371	0	0	0	0	
			Total Construction			0	0	0	0	0	
			New Development			2,969,371	0	0	0	0	
			Total Proposed Replacement Housing Fund Activities			2,969,371	0	0	0	0	

Annual Statement/Performance and Evaluation Report Capital Fund Program (CFP) Part I: Summary

PHA Name:
PHILADELPHIA HOUSING AUTHORITY

Grant Type and Number
Replacement Housing Fund Program Grant No: PA26R00250216

Federal FY of Grant:
2016

Original Annual Statement Reserve for Disasters/Emergencies
Performance and Evaluation Report for Program Year Ending:

Revised Annual Statement (Revision No:)
 Final Performance and Evaluation Report

Summary by Development Account

Line No.	Description	Total Estimated Cost			Total Actual Cost	
		Original	Revised	Obligated	Expended	
1	Total Non-CFP Funds	0		0	0	
2	1406 Operations	0				
3	1408 Management Improvements	0				
4	1410 Administrative Costs	0				
5	1411 Audit	0				
6	1415 Liquidated Damages	0				
7	1430 Fees and Costs	0		0	0	
8	1440 Site Acquisition	0				
9	1450 Site Improvements	0		0	0	
10	1460 Dwelling Structures	0		0	0	
11	1465.1 Dwelling Equipment-Nonexpendable	0				
12	1470 Non-Dwelling Space	0		0	0	
13	1475 Non-Dwelling Equipment	0				
14	1485 Demolition	0		0	0	
15	1490 Replacement Reserve	0				
16	1492 Moving to Work Demonstration	0				
17	1495 Relocation	0				
18	1499 Development Activities	978,561		0	0	
19	1501 Collateralization or Debt Service					
20	1502 Contingency					
21	Amount of Annual Grant (Sum of lines 2-20)	978,561		0	0	
22	Amount of Line 21 Related to LBP Activities					
23	Amount of Line 21 Related to Section 504 Compliance					
24	Amount of Line 21 Related to Security - Soft Costs					
25	Amount of Line 21 Related to Security - Hard Costs					
26	Amount of Line 21 Related to Energy Conservation Measures					
Signature of President & Chief Executive Officer and Date		Signature of Public Housing Director and Date				

Kelvin A. Jeremiah, President & Chief Executive Director

**Annual Statement/Performance and Evaluation Report
Capital Fund Program (CFP)
Part II: Supporting Pages**

PHA Name:		Grant Type and Number									
Philadelphia Housing Authority		Replacement Housing Fund Program Grant No: PA26R00250216									
		2016									
Development Number / Name	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	
						Original	Revised	Obligated	Expended		Comments
050	Blumberg	701490	New Development - Blumberg	1499	TBD	978,561	0	0	0	New construction and Revitalization of the Blumberg Development	
			Total New Development			978,561	0	0	0		
			Total Construction			0	0	0	0		
			New Development			978,561	0	0	0		
			Total Proposed Replacement Housing Fund Activities			978,561	0	0	0		

Appendix D: Local Asset Management Plan

Introduction

Pursuant to the First Amendment to the Moving to Work Agreement, in Fiscal Year 2010 (MTW Year Nine) the Philadelphia Housing Authority has implemented a local asset management plan for its Public Housing Program as described herein. In the implementation of the plan, PHA will continue to adopt cost accounting and financial reporting methods that comply with HUD and federal regulations and generally accepted accounting practices.

PHA's plan supports and is consistent with the agency's ongoing implementation of project based management, budgeting, accounting and financial management. PHA's project based management system emphasizes the provision of property management services that have met agency-wide standards while responding to the unique needs of each property. Day to day operations of PHA sites are coordinated and overseen by Asset Managers assigned to each property. PHA Asset Managers oversee the following management and maintenance tasks:

- Marketing and tenant selection
- Rent collections
- Routine and preventive maintenance
- Unit turnover
- Security
- Resident services
- Resident and community relations
- Capital improvements planning
- Other activities necessary to support the efficient operations of the site

In the implementation of these project level management activities, other PHA departments including Client Services, Public Safety, Maintenance, Development, ISM, Finance and Budget, Quality Assurance, and the Office of Strategic Management support PHA Asset Managers. Asset Managers are routinely provided with on-line detailed and summary management reports on budget status and all key performance indicators to facilitate their monitoring and oversight of property level activities. PHA also conducts multidisciplinary Performance Management meetings on a monthly basis, to allow for a thorough review of key performance indicators at the individual site and system-wide levels.

PHA Asset Managers develop and monitor property budgets with support from the PHA Finance and Budget staff. Budget trainings are held annually to support the budget development process. Asset Managers are provided with tools to develop their budget estimates including property-specific non-utility and utility cost data from the prior 18 months.

PHA's local asset management plan is consistent with the principles of asset management described in 24 CFR 990.255 and in the First Amendment to PHA's MTW Agreement. Further, the plan is generally consistent with the provisions of 24 CFR 990.260, 990.265, 990.270, 990.275 and 990.285. As allowed under the First Amendment to the MTW Agreement, PHA's

local asset management plan deviates from parts of 24 CFR 990.280, including requirements related to property management fees and fees for services. PHA will utilize the Cost Allocation method referenced in paragraph 6.F.4.b of the First Amendment.

Due to the unique features of the Philadelphia market, PHA's housing portfolio, and the agency, PHA has determined that use of the Cost Allocation method is the most efficient, cost-effective means of achieving the asset management principles referenced above. The factors that impact PHA's asset management plans include, but are not necessarily limited to, the following:

- Scattered Site Portfolio. PHA has over 4190 scattered site properties, which represents nearly 1/3 of its public housing portfolio. We understand this is far and away the largest scattered site public housing portfolio in the country. The geographic diversity of these scattered site units impacts warehouse operations, locations and numbers of management offices, and staffing requirements. The scattered site portfolio also includes a number of vacant lots, for which no HUD subsidy is received and for which a fee-based asset management approach could not be implemented. PHA has developed a strategy for reconfiguring this portfolio in a way that would be more cost-effective to operate which has been submitted to HUD for approval. Managing these sites presents unique challenges that PHA's asset management plans are structured to address.
- Aging Housing Stock. PHA operates one of the oldest public housing stocks in the country. It is more costly to operate than newer housing. PHA has engaged in an aggressive development program during the last few years to upgrade and redevelop its units. Due to a lack of adequate funds, this process is far from complete.
- Unionized Workforce. PHA has a heavily unionized workforce. Currently, PHA has contracts with approximately 11 unions. This significantly impacts the operations and costs of PHA's activities. As such, PHA's asset management plan is structured to be cost effective within the limits of these contracts.
- MTW Initiatives. Since the onset of its participation in MTW, PHA has sought to use its MTW flexibilities to implement agency-wide cost-cutting initiatives that will increase efficiencies, maximize use of federal dollars, and benefit PHA's clients. PHA has moved many functions to the site-based level, however a number of MTW initiatives require central administration so they can be adequately measured. For example, PHA has implemented innovative technological systems to maximize efficiencies in admissions, property management, and client services. There are costs associated with development and implementation of these systems before they are implemented at the site level. Under MTW, PHA has also implemented departmental oversight protocols through its Quality Assurance Program. PHA's quality control program has already made PHA's programs more efficient by reducing errors and improving oversight.
- Local Costs. Philadelphia is an old, industrial city where labor costs for maintenance and construction activities are significant. These high costs can be attributed to, in part, prevailing wage requirements as well as the cost of materials and services in the Philadelphia market.

A description of the cost allocation plan and other technical components of PHA's local asset management plan follows:

I. AMP Definitions

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

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

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

A. Cash & Investments

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

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

B. Tenant Accounts Receivable and Allowance for Doubtful Accounts

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

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

C. Other Accounts Receivable

Other accounts receivable will be distributed based on the purpose and source of the receivable. Receivables related to a PHA Managed AMP and PAPMC / AME Managed AMP will be distributed to the specific AMP. Any receivable that is not associated to a specific AMP will be distributed to the Indirect Cost Departments.

D. PHASI / Worker's Compensation Cash and Liabilities

The PHASI and Worker's Compensation cash and liabilities will remain with the Indirect Cost Departments and reported in the MTW column of the FDS. At this time, PHA has determined that these liabilities are PHA Agency Wide liabilities and not liabilities of the PHA Managed AMPs or the Indirect Cost Departments. The expenses related to the PHASI liability and worker's compensation liability are charged to appropriate programs or AMPs. PHA has created a cash reserve for the PHASI liability. The cash reserve offsets PHA's liabilities so that the liability is fully funded. PHA utilizes the reserves to pay the liability as needed. PHA has a cash reserve that is held by the Worker's Compensation insurer.

E. Prepaid Insurance

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

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

F. Materials Inventory and Allowance for Obsolete Inventory

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

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

G. Fixed assets and Accumulated Depreciation

Fixed assets and accumulated depreciation will be reconciled to the PeopleSoft Asset Module and distributed to the appropriate PHA Managed AMPs and the Indirect Cost Departments. PHA's Asset Module (AM) has been established for many years. AM provides PHA with the ability to prepare fixed asset and depreciation reports by AMP or

department. AM tracks all of the fixed assets transactions and records all monthly fixed asset entries. Fixed assets and accumulated depreciation are reported with the appropriate AMP or the MTW Column for assets held by the Indirect Cost Departments.

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

H. Accounts Payable and Accrued Liabilities

Other accounts payable and accrued liabilities includes all liabilities not specifically referred to in the following detailed liability categories. Other accounts payable and accrued liabilities will be distributed based on the purpose and source of the payable or liability. Payables or liabilities related to a PHA Managed AMP and PAPMC / AME Managed AMP will be distributed to the specific AMP. Any payable or liability that is not associated to a specific AMP will be distributed to the Indirect Cost Departments.

I. Payroll Liabilities

All payroll tax and benefits liabilities will continue to be presented with the Indirect Cost Departments and reported in the MTW Column of the FDS. At this time, PHA has determined that these liabilities are PHA Agency Wide liabilities and not liabilities of the PHA Managed AMPs or the Indirect Cost Departments. However, PHA has utilized the LIPH (Fund 001) cash accounts in the past to pay most Agency Wide liabilities, than the LIPH (Fund 001) will receive reimbursements from other programs where applicable. The expenses related to the payroll liabilities will continue to be charged to appropriate programs or AMPs.

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

J. Compensated Absences

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

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

K. Net Position

Invested in Capital Assets balances will follow the Net Fixed Assets that are owned by an AMPs or Departments. Invested in capital assets will be distributed between the Indirect

Cost Departments and the PHA Managed AMPs based on where the Net Fixed Assets is distributed.

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

PAPMC/AME Managed AMPs will not be included in the AMPs Column of the FDS. Invested in capital assets are included in the PHA Audited financial statements as a discretely presented component unit. PAPMC/AME Managed AMPs will not be included in the AMPs Column of the FDS. Unrestricted net assets are included in the PHA Audited financial statements as a discretely presented component unit.

III. Revenues

A. Tenant Revenues

1. PHA Managed AMPs

Tenant Revenues will be directly charged to the appropriate AMP.

2. PAPMC/AME Managed AMPs

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

B. Direct Revenues

Direct revenues include tenant fees and service charges that can be identified and charged to a specific site.

1. PHA Managed AMPs

PHA currently records all direct revenues to the proper PHA Managed AMP. PHA currently records all tenant charges and any direct revenue to the proper PHA Managed AMP. PHA's account structure includes the program code (AMP number) and the appropriate department code, which enables PHA to charge the revenues to the proper PHA Managed AMPs.

PHA's systems and procedures related to direct revenues currently in application are in compliance with asset based accounting. PHA's systems and procedures will require no transition period or transition procedures to comply with asset based accounting requirements of presenting all direct revenues under the proper AMP.

2. PAPMC/AME Managed AMPs

PAPMC/AME Managed AMPs will not be included in the AMPs Column of the FDS. Direct revenues are included in the PHA Audited financial statements as a discretely presented component unit.

C. Indirect Revenues

Indirect revenues are other income items that cannot be identified or charged to a specific AMP or to the Indirect Cost Departments. Indirect revenues will be allocated between the PHA Managed AMPs based on the number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation.

D. HUD Operating Subsidy

For PHA's project based accounting purposes, Operating Subsidy is considered an indirect revenue source. PHA's Operating Subsidy is provided in one block as if PHA were one AMP. The funding for all AMPs is calculated using the same Allowable Expense Level per PHA's MTW agreement. Since the basis of the funding calculation is the same across all AMPs, PHA considers Operating Subsidy an indirect revenue source.

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

E. Operating Transfers from the MTW Block (Excess HAP) & CFP

1. PHA Managed AMPs

PHA has included in its MTW annual plan Operating Transfers from the MTW Program and the CFP Program into the Public Housing Program to offset operating expenses. PHA has determined that the appropriate treatment of Operating Transfers at the current time based on the number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation. PHA will establish separate account numbers for the MTW and CFP Operating Transfers. The Operating Transfers are made to assist the PHA Managed AMPs with its operations. PHA may need to adjust the allocation of the Operating Transfers in fiscal years to assist the operating needs of one AMP over another AMP that may not need the assistance. PHA's MTW agreement with HUD permits the PHA flexibility to move funds between its Public Housing, Section 8 HCV, and CFP programs. PHA will reserve the right to adjust the allocations of the Operating Transfers to meet the financial needs of all of the PHA Managed AMPs.

2. PAPMC / AME Managed AMPs

Operating Transfers will not be allocated to the PAPMC / AME Managed AMPs.

I. Expenses

A. Direct Expenses

1. PHA Managed AMPs

PHA currently records all direct expenses to the proper AMP. PHA's procurement and accounts payables processes include assigning the proper chart fields or account structure. PHA's account structure includes the program code (AMP number) and the appropriate department code.

For payroll, PHA directly charges all payroll costs using account labels. Account labels are used to tell PHA's accounting system where to directly charge an employee's payroll costs. PHA can setup as many account labels as needed to have payroll costs charged to the proper program, department, AMP, etc. based on PHA's requirements. PHA's accounting system gives the Authority the automated ability to charge payroll costs from the employee timesheets to the proper account. When employees complete their weekly timesheets, the employees report all hours to account labels. The timesheets allow employees to charge as many account labels as needed during the week. Employees submit their timesheets to their direct supervisor for approval. The direct supervisor verifies that the correct account labels.

PHA's systems and procedures related to direct expenses currently in application are in compliance with asset based accounting. PHA's systems and procedures will require no transition period or transition procedures to comply with asset based accounting requirements of presenting all direct revenues and expenses under the proper AMP.

2. PAPMC/AME Managed AMPs

The only PAPMC/AME Managed AMPs direct expenses that will be included in AMPs FDS column are PHA's payment of Operating Subsidies and any other direct expense paid by PHA. All other direct expenses are included in the PHA Audited financial statements as a discretely presented component unit.

B. Corporate Legal

PHA has diverse legal issues due to the size of its programs. PHA will analyze legal expenses to determine the appropriate treatment of the legal expenditures. The treatments of the legal expenses are as follows:

1. Direct Legal Expenses

Legal expenses that can be identified as a direct cost to a specific AMP will be charged to that AMP.

2. Indirect Legal Expenses

Indirect legal expenses that cannot be defined as costs for a specific AMP, but can be identified as providing benefits to the PHA Managed AMPs based on the number of units eligible for subsidy from the most recent HUD approved Operating Fund Calculation.

C. Payroll Expenses

PHA currently directly charges all maintenance payroll costs to the direct PHA Managed AMP. PHA directly charges all payroll costs using account labels. Account labels are used to tell PHA's accounting system where to directly charge a maintenance employee's payroll costs. PHA can setup as many account labels as needed to have payroll costs charged to the proper PHA Managed AMP. PHA's accounting system gives the Authority the automated ability to charge maintenance payroll costs from the employee timesheets to the proper account. When maintenance employees complete their weekly timesheets, the employees report all hours to account labels. The timesheets allow maintenance employees to charge as many account labels as needed during the week. Maintenance employees submit their timesheets to their direct supervisor for approval. The direct supervisor verifies that the correct account labels.

D. Materials and Contract Costs

PHA currently records all maintenance materials and contract costs directly to the proper PHA Managed AMP. PHA's procurement and accounts payables processes include assigning the proper chart fields or account structure. PHA's account structure includes the program code (AMP number) and the appropriate department code.

PHA's systems and procedures related to maintenance materials and contract costs currently in application are in compliance with asset based accounting. PHA's systems and procedures will require no transition period or transition procedures to comply with asset based accounting requirements of presenting all direct revenues and expenses under the proper AMP.

E. Indirect Expenses

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

II. Capital Fund Program

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

Although PHA is an MTW agency and is not required to, PHA reports and tracks all CFP expenditures based on the CFP Budget Line Items. PHA has determined this method to be accurate and efficient method to track CFP expenditures.

III. Project Based Budgeting

PHA currently prepares project based operating budgets and operating budgets for all of the departments. PHA adds all of the budgets to the Automated Accounting System. The operating budgets are currently used in the procurement, accounts payable process and the preparation of monthly financial statements. PHA's operating budget process is currently in compliance with the HUD Project Based Budgeting requirements.

When PHA has prepared its Capital Fund Program Budgets, PHA determines specific capital work items that need to be completed at all or some of PHA sites. PHA does not establish a Capital Budget by site, but by work item. Then once PHA determines which sites PHA will perform the work item, PHA reclassifies the budget amount from a PHA Wide work item to the specific site. PHA will continue this process; however, the budget will be established at the Capital Projects category rather than PHA Wide.

Appendix E: Asset Management Table
(Updated October 2016)

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
1.	Abbottsford Homes PA002030	Phases I & II; 688 Family Units	Intent for RAD Conversion	Possible site for additional redevelopment including commercial space, through mixed financing.	Possible disposition of a portion of the site in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
2.	Arch Homes PA002018	77 Family	Intent for RAD Conversion	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice/RAD and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
3.	Bartram Village PA002031	492 Family Units	Intent for RAD Conversion	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
4.	Bentley Hall	100 Elderly		As part of Sharswood Blumberg		99 Elderly Units	Possible conversion	

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
	PA002077	Units		revitalization, possible façade improvements.			of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
5.	Brewerytown	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RD and/or PHA wholly-owned subsidiary and/or private entities.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
6.	Cambridge Plaza Phase I PA-002137	44 LIHTC Rental Units						
7.	Cambridge Plaza Phase II PA-002129	40 LIHTC Rental Units						
8.	Cambridge Plaza Phase III Phase I PA002147	40 LIHTC Rental Units						
9.	Cassie Holly (Point Breeze Court) PA002062	71 Elderly Units	Security Upgrades Planned	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.		71 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and	

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
							supportive services offices and/or open space.	
10.	Champlost Homes PA002042	102 Family		Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
11.	City-Wide	To be determined		Provision of ACC subsidy, capital funds or HCV.	Dispo/Demo application to be submitted to HUD.			
12.	Collegeview Homes PA002065	54 Elderly	As part of Sharswood Blumberg revitalization, possible façade improvements and RAD conversion.	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.		54 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
13.	Eastern Germantown Infill	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
14.	Eastern North Philadelphia	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
15.	Eight Diamonds PA00126 PA00141 (Formerly known as Raymond Rosen Off-Site PA002126)	Phases A & B; 152 Family	Intent for RAD Conversion	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
16.	Emlen Arms PA002076	156 Elderly High Rise				156 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
17.	Fairhill Apartments PA002055	264 Family			Possible demolition in connection with modernization and revitalization, and possible disposition in connection		Possible conversion of units/parcels for residential unit reconfiguration and commercial,	

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
					with mixed-finance development. Additional disposition applications and conveyances to RD and/or PHA wholly-owned subsidiary and/or private entities.		economic development, management offices, community and supportive services offices and/or open space.	
18.	Falls Ridge PA002130	135 LIHTC Rental Units		Development partnership planned on vacant land.				
19.	Francisville	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase conventional sale and Housing Choice vouchers.
20.	Germantown House PA002152	133 Units	Planned renovation and leasing of adult care space.			133 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
21.	Gladys B. Jacobs PA002114	80 Elderly		Possible renovation for delivery of enhanced senior support services.		80 Elderly Units		
22.	Greater Grays Ferry Estates (Formerly known as Tasker	429 LIHTC rental units; 125 replacement	Water penetration repairs planned.	Possible mixed-finance development and commercial development including community building on PHA	Possible disposition in connection with non-dwelling commercial development including			

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
	Homes) New AMP#s: PA002139 PA002143	home ownership units.		vacant lots and public parcels	community building.			
23.	Haddington Homes PA002035	150 Family	Intent for RAD Conversion	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
24.	Harrison Plaza PA002015	300 Family High and Low Rise	Intent for RAD Conversion	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice/RAD and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
25.	Haverford Homes PA002046	24 Family		Possible candidate for modernization, rehabilitation, with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
26.	Herbert Arlene	32 Family	Intent for RAD	Possible candidate for	Possible demolition in	Possible Elderly	Possible conversion	

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
	Homes PA002104		conversion	modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.	connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.	Designation	of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
27.	Hill Creek Apts I & II PA002029	334 Family		Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
28.	Holmecrest Apartments PA002066	84 Elderly		Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.		84 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
29.	Inglis House	TBD		May provide capital funds, ACC subsidy and/or Section 8 vouchers for this project.				
30.	James Weldon Johnson House PA002001	535 Family	Master planning for historic renovations and	Possible candidate for modernization, rehabilitation with capital funds, bond		Possible Elderly Designation	Possible conversion of units/parcels for residential unit	

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			modernization.	proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.			reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
31.	Katie B. Jackson PA002063	59 Elderly 9 Family		Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.		59 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
32.	Liddonfield Homes I PA002023	412 Family Low Rise (VACANT)	PHA has selected developer and is finalizing sales agreement.	Possible candidate for revitalization/development by third party developer, which may include some demolition with capital funds, MTW, program incomes.	Completed demolition in connection with the required conversion and/or disposition for FMV. Disposition pending developer selection.		Completed mandatory conversion of units/parcels for residential development, and/or commercial, economic development.	
33.	Lucien E. Blackwell Homes Phase I PA002145	80 LIHTC Rental Units						
34.	Lucien E. Blackwell Homes Phase II PA002150	80 LIHTC Rental Units						
35.	Lucien E. Blackwell Homes Phase III	50 LIHTC Rental Units						

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
	PA002153							
36.	Lucien E. Blackwell Homes Phase IV (Marshall Shepard Village) PA002156	80 LIHTC Rental Units						
37.	Ludlow HOPE 6 Area Scattered Sites PA #: PA002154	Phases I, II, III, IV & V; 75 LIHTC and 103 Homeownership units		Development completed				
38.	Mantua Hall PA002045	152 Family High-Rise Units	Water penetration repairs and leasing of commercial spaces.	Under revitalization, which includes some demolition with capital funds, bond proceeds, MTW, Stimulus, program incomes, private funds and LIHTC equity to develop 101 new units.	Building demolished and disposition for mixed-finance development.			
39.	Martin Luther King Plaza PA002036 New PA#: PA002128 PA002136 PA002149	Phases I, II, III, IV, V & VI; 136 LIHTC Rental Units and 109 Replacement Homeownership Units.	Intent for RAD Conversion	All Phases completed. New construction of 19 market rate homeownership units on a portion of the site.	Possible disposition in connection with mixed-finance development and/or other sale transactions to City and private developers.			109 Homeownership Units. HOPE VI HO Middle income Program essential elements of Nehemiah, USHA of 1937.
40.	Mill Creek Extension East	100 Rental Units		Possible scattered sites acquisition. Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition I connection with modernization and revitalization.			Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
41.	Mill Creek Extension West	100 Rental Units		Possible scattered sites acquisition. Acquisition, new development and rehabilitation	Possible demolition I connection with modernization and			Possible homeownership component, subject to

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	revitalization.			Section 32 of the USHA of 1937 will include lease purchase conventional sale and Housing Choice vouchers.
42.	Morton Homes PA002049	65 Units	Planned electrical upgrades as part of the Better Building Challenge.	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.	47 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
43.	Mt. Olivet PA002138	161 LIHTC Rental Units		Possible major exterior envelope and air conditioner heating system to be improved.		161 Elderly Units		
44.	Nellie Reynolds Garden PA002158	64 Elderly housing units.		Development completed		64 Elderly housing designation.		
45.	Neumann North PA002148	67 LIHTC Rental Units				67 Elderly Units Designated		
46.	Norris Apartments PA002014	157 Family High Rise, 68 Family Low-Rise	RAD Choice Neighborhood Redevelopment	Modernization, rehabilitation, revitalization, which will include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds. PHA will use Choice Neighborhood and/or LIHTC Application when available.	Possible demolition in connection with the revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Homeownership component in connection with potential modernization and revitalization.

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
47.	Oak Lane	100 Rental Units		Possible scattered sites acquisition. Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.	May be requesting Elderly or Disabled Only designation.	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase conventional sale and Housing Choice vouchers.
48.	Oxford Village PA002032	200 Family Units		Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.	Possible demolition I connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
49.	Parkview Apartments PA002054	20 Elderly Low Rises						
50.	Paschall Homes PA002061	223 Family		Under revitalization, which includes demolition with capital funds, bond proceeds, MTW, Stimulus, program incomes, private funds and LIHTC equity to develop 100 new units.	Demolition in connection with the modernization and revitalization, and possible acquisition/disposition in connection with mixed-finance development.	Possible Elderly Designation		Possible homeownership component in connection with potential modernization and revitalization.
51.	Plymouth Hall PA002079	69 Elderly High Rise	Intent for RAD Conversion	Rehabilitation with capital funds to develop 53 ACC units		53 Elderly Units Elderly Designation to be revised	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices,	

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
							community and supportive services offices and/or open space. Reduce unit count from 60 to 53 with new community space.	
52.	Poplar to Oxford: Planning and Development Initiative	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units. PHA plan to submit the LIHTC and/or other State, City funding sources for new development.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RD and/or PHA wholly-owned subsidiary and/or private entities.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase conventional sale and Housing Choice vouchers.
53.	Queen Lane I Apartments PA002024	120 Family high Rise		Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds. PHA plan to apply for Choice/RAD, Choice Neighborhood and/or LIHTC Application when available.	Potential demolition an disposition applications in connection with new development and mixed finance.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
54.	Raymond Rosen On-Site PA002010	356 Family						
55.	Richard Allen Homes Phase III PA002133	178 LIHTC Rental Units						Includes 15-year tax credit and lease purchase homeownership components.
56.	Richard Allen	150 Units		Possible new development for	Possible disposition in			Possible

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
	Homes Phase II PA002003			residential and non-residential on vacant undeveloped parcels	connection with the new development.			homeownership component in connection with potential modernization and revitalization.
57.	Scattered Site Disposition: City- Wide	To be determined		Disposition Plan to be developed and implemented. Disposition of properties at market rate.	Possible demolition in connection with the modernization and revitalization. Disposition application may be required.			Possible Homeownership Component: Revised 5(h)/Section 32 of USHA of 1937. Possible PHA affordable homeownership program.
58.	Scattered Sites PA002000906	412 Family Units	Intent for RAD Conversion - 69 units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units and imminently dangerous properties for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
59.	Scattered Sites PA002000907	958 Family Units	Intent for RAD Conversion - 85 units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance	Possible demolition/disposition of non-viable units and imminently dangerous properties for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices,	Section 32 of USH of 1937.

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.			community and supportive services offices and/or open space.	
60.	Scattered Sites PA002000908	14 Family Units	Intent for RAD Conversion - 104 units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units and imminently dangerous properties for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
61.	Scattered Sites PA002000901	1,869 Family	Intent for RAD Conversion - 63 units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or	Possible demolition/disposition of non-viable units and imminently dangerous properties for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open	Section 32 of USHA of 1937. Possible homeownership component in connection with potential modernization and revitalization.

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.			space.	
62.	Scattered Sites PA002000902	21 Family Units	Intent for RAD Conversion - 111 units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units and imminently dangerous properties for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
63.	Scattered Sites PA002000903	988 Family Units	Intent for RAD Conversion - 70 units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice	Possible demolition/disposition of non-viable units and imminently dangerous properties for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				Neighborhood, LIHTC, RACP and any other state and city funding sources when available.				
64.	Scattered Sites PA002000904	41 Family Units	Intent for RAD Conversion - 71 units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units and imminently dangerous properties for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
65.	Scattered Sites PA002000905	173 Family Units	Intent for RAD Conversion - 77 units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units and imminently dangerous properties for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
66.	Scattered Sites	604 Family	Intent for RAD	Possible development,	Possible		Possible conversion	Section 32 of USHA

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
	PA002000909	Units	Conversion - 173 units	rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	demolition/disposition of non-viable units and imminently dangerous properties for neighborhood redevelopment activity.		of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	of 1937.
67.	Scattered Sites PA002000910	514 Family Units	Intent for RAD Conversion - 163 units	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units and imminently dangerous properties for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
68.	Sharswood Area Condemnation	1300 parcels to acquired	Complete condemnation process and pay just	Land assembly activities to support revitalization activities in the Blumberg area. Activities to include demolition,	Possible demolition in connection with the modernization and revitalization, and possible		Possible conversion of units/parcels for residential unit reconfiguration and	Possible homeownership component in connection with

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			compensation to owners.	disposition and new construction activities by PHA and/or Development Partners. Complete URA relocation of owners and tenants of condemned property.	disposition in connection with mixed-finance development or to private developers.		commercial economic development, management offices, community and supportive services offices and/or open space.	potential modernization and revitalization.
69.	South Phila area planning	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
70.	Southwest Phila Area planning	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
71.	Spring Garden Apartments PA002020	203 Family		Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.	Potential demolition and disposition applications may be submitted for a portion of site.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services	Possible homeownership component in connection with potential modernization and revitalization.

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
							offices and/or open space.	
72.	Spring Garden Area Unit Conversion	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
73.	Spring Garden Revitalization: Phase 1 PA002127	84 LIHTC Rental Units	Intent for RAD Conversion					
74.	Spring Garden Revitalization: Phase 2 PA002162	58 LIHTC Units 32 ACC units	Intent for RAD Conversion	Mixed-finance development by third party developer.	Disposition of scattered site properties for new development.			
75.	St Anthony's Senior Residence: PA002131	38 Elderly LIHTC Units	Intent for RAD Conversion			38 Elderly Units		
76.	St Ignatius Phase I (Angela Court II) PA002146 PA002159	Phases I; 67 Elderly Units Phase II 64?				67 and 54 Elderly Units Designated		
77.	Suffolk Manor PA002132	137 LIHTC Rental Units		Possible major exterior envelope and air conditioner heating system to be improved.		77 Elderly Units		
78.	Transitional Housing	500 Rental Units		New construction of transitional housing units for homeless families and individuals and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development,	

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.		management offices, community and supportive services offices and/or open space.	
79.	Warnock PA002160	Phase I 50; TBD		Development completed.				
80.	Warnock PA002161	Phase II Transitional housing; 45 units		Acquisition, new development for 45 housing units and rehabilitation of housing stock along with neighborhood revitalization efforts with PHA offices and Elderly Services space.		45 Elderly housing designation.		
81.	West Park Plaza PA002093	66 Units	Intent for RAD Conversion	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
82.	West Philadelphia North of Market Street	45	Market West to be planned and begin acquisition activities.	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
83.	Westpark Apartments PA002039	325 Family High-Rise Units	Intent for RAD Conversion	Possible candidate for modernization, rehabilitation, revitalization, which may	Possible demolition in connection with the modernization and		Possible conversion of units/parcels for residential unit	Possible homeownership component in

	Name, Number and Location	Number and Type of Units	Note for 2018 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.	revitalization, and possible disposition in connection with mixed-finance development or to private developers.		reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	connection with potential modernization and revitalization.
84.	Whitehall Apartments I PA002034	188 Family		Modernization completed.				
85.	Wilson Park PA002013	741 Family, Low-rise; Elderly, High-rise		Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with Choice/RAD and/or LIHTC Application.		279 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial economic development, management offices, community and supportive services offices and/or open space.	
86.	Walton School		Intent for RAD Conversion	Redevelopment into Senior Housing.				
87.	Reynolds School			Redevelopment of Vacant School in Sharswood Neighborhood.				

Appendix F: Planned Demo/Dispo Additional Documentation

Listed below are scattered sites units which are planned for demolition and/or disposition in FY 2018 or subsequent periods. PHA may modify this listing in the future. Approvals by the PHA Board of Commissioners and HUD are required in order to proceed with demolition/disposition activities.

Unit ID	Project #	Unit Address	BR
VACANT LOTS			
041525	905	2112 N 04TH STREET	4
041616	905	2559 N FRANKLIN ST	5
041619	905	410 W NORRIS ST	6
041658	905	2315 N 07TH STREET	2
041659	905	2315 N 07TH STREET	6
041699	905	2430 N 06TH STREET	1
041700	905	2430 N 06TH STREET	4
041712	905	1947 N LAWRENCE ST	5
041713	905	2045 N 05TH STREET	4
041797	905	402 W DAUPHIN ST	5
041810	905	416 W DAUPHIN ST	5
041821	905	622 W CUMBERLAND ST	5
041834	905	2164 N 05TH STREET	5
041840	905	324 W DAUPHIN ST	5
041877	905	2215 N LAWRENCE ST	3
041945	905	2350 N BODINE ST	3
041947	905	1426 N LAWRENCE ST	4
041948	905	2627 N 06TH STREET	2
041949	905	2627 N 06TH STREET	4
041962	905	2414 N 06TH STREET	2
041963	905	2414 N 06TH STREET	3
041964	905	2414 N 06TH STREET	3
041965	905	2556 N 07TH STREET	1
041966	905	2556 N 07TH STREET	4
042035	905	2310 N LAWRENCE ST	3
042036	905	544 W HUNTINGDON ST	5
042100	905	2208 N LEITHGOW ST	2
042101	905	2222 N LEITHGOW ST	2
042102	905	2224 N LEITHGOW ST	2
042175	905	1920 N 03RD STREET	4
042298	905	1722 N ORIANNA ST	6
042344	905	438 DIAMOND ST	4
042381	905	532 DIAMOND ST	4

Unit ID	Project #	Unit Address	BR
042430	905	2343 N 06TH STREET	5
042447	905	2360 N BODINE ST	3
042448	905	2350 N ORKNEY ST	2
042449	905	2352 N ORKNEY ST	2
042488	905	2351 N ORKNEY ST	2
042489	905	2353 N ORKNEY ST	2
042497	905	2355 N ORKNEY ST	2
042545	905	2344 N ORKNEY ST	2
042546	905	2348 N ORKNEY ST	2
042584	905	311 W BERKS ST	3
042585	905	311 W BERKS ST	3
042586	905	311 W BERKS ST	3
042587	905	408 W BERKS ST	1
042588	905	408 W BERKS ST	4
042617	905	2343 N MARSHALL ST	4
042665	905	2412 N 06TH STREET	2
042666	905	2412 N 06TH STREET	6
042713	905	1846 N LEITHGOW ST	4
042728	905	2412 N 03RD STREET	5
042729	905	929 W HUNTINGDON ST	5
042808	905	2336 N BODINE ST	3
042896	905	1553 N 06TH STREET	2
042897	905	1553 N 06TH STREET	6
042909	905	543 W MONTGOMERY AVE	5
042910	905	543 W MONTGOMERY AVE	2
042929	905	2036 N BODINE ST	2
042930	905	406 W BERKS ST	2
042931	905	406 W BERKS ST	5
042949	905	2347 N 03RD STREET	5
042950	905	2438 N LEITHGOW ST	2
043019	905	2025 N 03RD STREET	5
043085	905	2340 N 06TH STREET	2
043086	905	2340 N 06TH STREET	5
043126	905	2338 N 03RD STREET	5
043153	905	193 W DAUPHIN ST	4
043154	905	2538 N HOPE ST	2
043177	905	2254 PALETHORP ST	5
043186	905	412 W DAUPHIN ST	5
043187	905	317 W BERKS ST	3
043188	905	317 W BERKS ST	3

Unit ID	Project #	Unit Address	BR
043193	905	2331 N 06TH STREET	6
043237	905	2003 N 05TH STREET	1
043238	905	2003 N 05TH STREET	4
043256	905	2214 N LEITHGOW ST	2
043257	905	1529 N 06TH STREET	3
043258	905	1529 N 06TH STREET	3
043268	905	2222 N LAWRENCE ST	5
043280	905	1555 N 06TH STREET	1
043281	905	1555 N 06TH STREET	5
043308	905	2232 N 03RD STREET	5
043334	905	2530 N 06TH STREET	3
043335	905	2530 N 06TH STREET	3
043361	905	1930 PALETHORP ST	5
043372	905	302 W SUSQUEHANNA AVE	2
043373	905	302 W SUSQUEHANNA AVE	5
043374	905	1936 N 04TH STREET	4
043377	905	1837 N 06TH STREET	4
043389	905	314 W DAUPHIN ST	1
043390	905	314 W DAUPHIN ST	4
043412	905	2322 PALETHORP ST	4
043434	905	2223 N 05TH STREET	4
043435	905	1533 N 06TH STREET	3
043436	905	1533 N 06TH STREET	3
043437	905	1533 N 06TH STREET	1
043443	905	2231 N ORKNEY ST	2
043463	905	2149 N 05TH STREET	2
043464	905	2149 N 05TH STREET	5
043478	905	618 W YORK ST	4
043479	905	618 W YORK ST	5
043500	905	2339 N 06TH STREET	5
043504	905	647 W CUMBERLAND ST	3
043505	905	647 W CUMBERLAND ST	6
043548	905	517 W DAUPHIN ST	3
043549	905	517 W DAUPHIN ST	3
043634	905	2336 N 03RD STREET	5
043703	905	421 W BERKS ST	2
043704	905	421 W BERKS ST	3
043728	905	313 W BERKS ST	5
043729	905	313 W BERKS ST	5
043730	905	2001 N 04TH STREET	1

Unit ID	Project #	Unit Address	BR
043731	905	2001 N 04TH STREET	4
043736	905	2213 N 05TH STREET	4
043829	905	2256 N HOWARD ST	5
043878	905	543 W BERKS ST	3
043879	905	543 W BERKS ST	3
043880	905	543 W BERKS ST	3
043914	905	2446 N 06TH STREET	3
043915	905	2446 N 06TH STREET	4
043941	905	2150 N ORKNEY ST	3
124817	905	1923 N 05TH STREET	4
124835	905	2367 N 03RD STREET	5
124836	905	2256 N REESE ST	3
124847	905	2222 N 03RD STREET	5
124896	905	2127 N 05TH STREET	5
124918	905	2215 N 05TH STREET	4
124958	905	327 W SUSQUEHANNA AVE	6
124992	905	2243 N REESE ST	4
125030	905	1848 N LEITHGOW ST	5
125035	905	436 W NORRIS ST	5
125043	905	2228 N LAWRENCE ST	5
125055	905	2227 N REESE ST	5
125097	905	316 W NORRIS ST	5
125136	905	2455 N 06TH STREET	5
125141	905	1853 N LEITHGOW ST	5
125183	905	2443 N HOWARD ST	2
125201	905	608 W HAROLD ST	3
125226	905	440 W NORRIS ST	5
125236	905	520 W YORK ST	5
125239	905	1940 N 03RD STREET	4
125269	905	2128 N REESE ST	2
125283	905	2526 N HOWARD ST	5
125305	905	1849 N LEITHGOW ST	5
125330	905	2528 N 06TH STREET	6
125355	905	2551 N ORKNEY ST	2
125358	905	526 MORSE ST	2
125371	905	642 W CUMBERLAND ST	6
125379	905	1842 N LEITHGOW ST	5
125418	905	1739 N ORIANNA ST	4
125467	905	2209 N 05TH STREET	4
125564	905	1913 N 04TH STREET	4

Unit ID	Project #	Unit Address	BR
125578	905	185 W NORRIS ST	4
125594	905	2332 N BODINE ST	2
125603	905	538 EDGLEY ST	2
125605	905	813 W HUNTINGDON ST	4
125646	905	622 W HUNTINGDON ST	5
125661	905	2260 N LEITHGOW ST	2
125686	905	528 MORSE ST	2
125699	905	534 EDGLEY ST	2
125746	905	1935 N LAWRENCE ST	4
125772	905	311 W YORK ST	4
125796	905	2549 N ORKNEY ST	2
125815	905	262 DIAMOND ST	5
125842	905	2234 N 04TH STREET	4
125938	905	407 W BERKS ST	4
255979	905	2327 N 06TH STREET	5
690176	905	523 W MONTGOMERY AVE	5
690233	905	537 W MONTGOMERY AVE	5
690260	905	1945 N 04TH STREET	4
690340	905	2441 N MARSHALL ST	5
690423	905	2220 N LAWRENCE ST	6
690438	905	2140 N 03RD STREET	5
690519	905	2256 N HANCOCK ST	4
690795	905	2052 N 03RD STREET	4
690832	905	2322 N 03RD STREET	4
690869	905	2357 N 03RD STREET	4
690913	905	2118 N 03RD STREET	4
691005	905	2045 N 03RD STREET	5
691049	905	2560 N 07TH STREET	5
691099	905	2325 N 03RD STREET	5
691108	905	2329 N 03RD STREET	5
691112	905	618 W CUMBERLAND ST	5
691271	905	2320 N 03RD STREET	5
691326	905	2328 N 03RD STREET	5
691340	905	2232 N LAWRENCE ST	5
691342	905	2216 N LAWRENCE ST	5
691444	905	2133 N 05TH STREET	4
691449	905	2020 N 03RD STREET	5
691501	905	938 W. HUNTINGDON ST	1
804002	905	322 DIAMOND ST	4
804003	905	424 W YORK ST	4

Unit ID	Project #	Unit Address	BR
804004	905	424 W YORK ST	4
804037	905	426 DIAMOND ST	5
804085	905	309 W YORK ST	5
804111	905	522 DIAMOND ST	4
804122	905	2146 N 05TH STREET	5
804169	905	1912 N 03RD STREET	2
804170	905	1912 N 03RD STREET	3
804171	905	1914 N 03RD STREET	2
804172	905	1914 N 03RD STREET	3
804202	905	1714 N ORIANNA ST	4
804203	905	1733 N ORIANNA ST	4
804204	905	1741 N ORIANNA ST	4
804223	905	2340 N ORKNEY ST	2
804241	905	2352 N BODINE ST	3
804260	905	2249 PALETHORP ST	4
804261	905	1934 N LEITHGOW ST	3
804275	905	309 W NORRIS ST	6
804276	905	304 W YORK ST	5
804277	905	626 W CUMBERLAND ST	3
804278	905	626 W CUMBERLAND ST	3
804296	905	2128 N 02ND STREET	5
804303	905	2601 N 04TH STREET	3
804304	905	2601 N 04TH STREET	3
804305	905	2601 N 04TH STREET	3
804350	905	1443 N 05TH STREET	1
804351	905	1443 N 05TH STREET	4
804382	905	1945 MUTTER ST	2
804524	905	1932 PALETHORP ST	5
804544	905	2239 PALETHORP ST	3
804545	905	2243 PALETHORP ST	3
804559	905	529 W MONTGOMERY AVE	3
804560	905	529 W MONTGOMERY AVE	3
804586	905	2329 N 06TH STREET	3
804587	905	2329 N 06TH STREET	2
804609	905	1551 N 06TH STREET	2
804610	905	1551 N 06TH STREET	3
804611	905	1551 N 06TH STREET	1
804621	905	1523 N 06TH STREET	3
804622	905	1523 N 06TH STREET	5
804639	905	2442 N 06TH STREET	2

Unit ID	Project #	Unit Address	BR
804640	905	2442 N 06TH STREET	4
804695	905	2539 N HOWARD ST	5
804722	905	533 EDGLEY ST	2
804723	905	535 EDGLEY ST	2
804731	905	1939 N 04TH STREET	5
818023	905	527 W BERKS ST	5
818041	905	2256 N 04TH STREET	3
818170	905	404 W HUNTINGDON ST	5
818229	905	541 W BERKS ST	5
818313	905	35 E SOMERSET ST	5
818336	905	428 W NORRIS ST	5
818352	905	1846 N 04TH STREET	5
926744	905	526 W DAUPHIN ST	4
926749	905	612 W HAROLD ST	3
926753	905	2217 N LAWRENCE ST	2
926757	905	2324 MUTTER ST	2
926769	905	2046 N ORKNEY ST	2
926784	905	1915 N 02ND STREET	5
926785	905	1922 N 02ND STREET	5
926786	905	2507 N 02ND STREET	3
041546	906	1610 N 17TH STREET	6
041555	906	1612 N 17TH STREET	6
041959	906	1913 PARRISH ST	5
042079	906	1825 WALLACE ST	5
042080	906	1825 WALLACE ST	5
042107	906	1407 N 17TH STREET	3
042108	906	1407 N 17TH STREET	3
042109	906	1407 N 17TH STREET	3
042215	906	1620 W OXFORD ST	3
042216	906	1620 W OXFORD ST	3
042217	906	1620 W OXFORD ST	3
042285	906	1708 CAMBRIDGE ST	4
042286	906	1708 CAMBRIDGE ST	3
042336	906	1304 N 18TH STREET	3
042337	906	1304 N 18TH STREET	3
042403	906	1743 N SYDENHAM ST	5
042455	906	1810 W MONTGOMERY AVE	5
042464	906	1507 BROWN ST	4
042593	906	1437 N 17TH STREET	2
042594	906	1437 N 17TH STREET	3

Unit ID	Project #	Unit Address	BR
042595	906	1437 N 17TH STREET	3
042618	906	1112 NORTH ST	3
042624	906	1414 N 17TH STREET	2
042625	906	1414 N 17TH STREET	3
042626	906	1414 N 17TH STREET	3
042772	906	844 N 16TH STREET	4
042943	906	1622 W OXFORD ST	3
042944	906	1622 W OXFORD ST	2
042945	906	1622 W OXFORD ST	3
042972	906	1243 N 15TH STREET	2
042973	906	1243 N 15TH STREET	6
042992	906	1701 SEYBERT ST	3
043121	906	1620 WILLINGTON ST	1
043122	906	1620 WILLINGTON ST	5
043143	906	1429 N 18TH STREET	2
043144	906	1429 N 18TH STREET	3
043145	906	1429 N 18TH STREET	3
043170	906	1632 W OXFORD ST	4
043171	906	1632 W OXFORD ST	3
043172	906	1632 W OXFORD ST	3
043181	906	610 N 11TH STREET	4
043182	906	610 N 11TH STREET	3
043183	906	610 N 11TH STREET	4
043351	906	918 N 17TH STREET	3
043352	906	918 N 17TH STREET	3
043353	906	918 N 17TH STREET	4
043469	906	649 N 11TH STREET	2
043470	906	649 N 11TH STREET	3
043471	906	649 N 11TH STREET	3
043590	906	1426 POPLAR ST	3
043591	906	1426 POPLAR ST	3
043592	906	1426 POPLAR ST	2
043601	906	720 N 20TH STREET	3
043602	906	720 N 20TH STREET	3
043603	906	720 N 20TH STREET	3
043631	906	1628 N 17TH STREET	4
043632	906	1628 N 17TH STREET	4
043633	906	1628 N 17TH STREET	4
043648	906	1702 INGERSOLL ST	5
043670	906	1513 W OXFORD ST	3

Unit ID	Project #	Unit Address	BR
043671	906	1513 W OXFORD ST	3
043672	906	1513 W OXFORD ST	3
043773	906	632 N 12TH STREET	3
043774	906	632 N 12TH STREET	3
043775	906	632 N 12TH STREET	3
043784	906	721 N 10TH STREET	3
043785	906	721 N 10TH STREET	3
043786	906	721 N 10TH STREET	3
043837	906	1801 WALLACE ST	4
043838	906	1801 WALLACE ST	4
043839	906	1801 WALLACE ST	4
043851	906	730 N 19TH STREET	2
043852	906	730 N 19TH STREET	4
043893	906	1807 WALLACE ST	4
043894	906	1807 WALLACE ST	3
043895	906	1807 WALLACE ST	3
043907	906	1725 N GRATZ ST	5
043959	906	626 N 10TH STREET	3
043960	906	626 N 10TH STREET	3
043961	906	626 N 10TH STREET	3
043976	906	1538 W MASTER ST	4
043977	906	1538 W MASTER ST	4
043978	906	1538 W MASTER ST	4
124829	906	1803 SHARSWOOD ST	5
124912	906	1418 N 17TH STREET	4
124913	906	1418 N 17TH STREET	4
124948	906	1606 N SYDENHAM ST	5
124957	906	820 LELAND ST	5
125040	906	1808 INGERSOLL ST	4
125063	906	1601 WILLINGTON ST	4
125074	906	1619 W FLORA ST	4
125175	906	1716 INGERSOLL ST	4
125251	906	847 PERKIOMEN ST	5
125328	906	1609 OGDEN ST	4
125744	906	2032 POPLAR ST	4
690196	906	1404 WILLINGTON ST	5
690244	906	721 N 17TH STREET	3
690245	906	721 N 17TH STREET	4
690330	906	1411 N 17TH STREET	3
690331	906	1411 N 17TH STREET	3

Unit ID	Project #	Unit Address	BR
690332	906	1411 N 17TH STREET	3
690367	906	1626 W OXFORD ST	3
690368	906	1626 W OXFORD ST	2
690369	906	1626 W OXFORD ST	3
690441	906	1632 CAMBRIDGE ST	5
690979	906	1610 PARRISH ST	4
691259	906	1803 WALLACE ST	3
691260	906	1803 WALLACE ST	4
691261	906	1803 WALLACE ST	3
691440	906	1614 N 17TH STREET	6
691456	906	1815 WALLACE ST	4
691457	906	1815 WALLACE ST	3
691458	906	1815 WALLACE ST	4
691459	906	1817 WALLACE ST	4
691460	906	1817 WALLACE ST	3
691461	906	1817 WALLACE ST	4
803994	906	622 N 10TH STREET	4
803995	906	622 N 10TH STREET	4
804062	906	1536 W MASTER ST	3
804063	906	1536 W MASTER ST	3
804064	906	1536 W MASTER ST	3
804153	906	1533 N 17TH STREET	3
804154	906	1533 N 17TH STREET	4
804155	906	1533 N 17TH STREET	3
804356	906	1831 WALLACE ST	3
804357	906	1831 WALLACE ST	3
804358	906	1831 WALLACE ST	3
804388	906	1422 N 17TH STREET	4
804389	906	1422 N 17TH STREET	4
804401	906	1433 N 17TH STREET	3
804402	906	1433 N 17TH STREET	3
804403	906	1433 N 17TH STREET	3
804478	906	636 N 11TH STREET	2
804479	906	636 N 11TH STREET	6
804521	906	1527 N 17TH STREET	3
804522	906	1527 N 17TH STREET	3
804523	906	1527 N 17TH STREET	3
804552	906	925 N 19TH STREET	2
804553	906	925 N 19TH STREET	3
804554	906	925 N 19TH STREET	3

Unit ID	Project #	Unit Address	BR
804598	906	1518 GREEN ST	4
804599	906	1518 GREEN ST	4
804600	906	1518 GREEN ST	4
804623	906	1432 POPLAR ST	3
804624	906	1432 POPLAR ST	3
804625	906	1432 POPLAR ST	3
804651	906	1616 W OXFORD ST	3
804652	906	1616 W OXFORD ST	2
804653	906	1616 W OXFORD ST	3
804654	906	1624 W OXFORD ST	3
804655	906	1624 W OXFORD ST	2
804656	906	1624 W OXFORD ST	3
804698	906	1209 MT VERNON ST	4
804709	906	1809 W MASTER ST	3
804710	906	1809 W MASTER ST	4
804714	906	1618 N 17TH STREET	4
804715	906	1618 N 17TH STREET	5
818309	906	1730 N GRATZ ST	4
818321	906	740 N UBER ST	4
125504	904	2912 N 07TH STREET	5
125731	904	1946 W HILTON ST	2
125860	904	2940 N SYDENHAM ST	2
255956	904	3015 N MARVINE ST	3
255977	904	1050 W STELLA ST	2
255985	904	2811 N BOUDINOT ST	4
818103	904	3034 N HUTCHINSON ST	3
818184	904	3066 N 08TH STREET	6
818222	904	3136 N 08TH STREET	3
818295	904	2724 N WARNOCK ST	3
818333	904	3135 N WENDLE ST	3
818426	904	2925 N 06TH STREET	6
818466	904	3100 N 08TH STREET	4
857119	904	4717 N 11TH STREET	3
857130	904	3346 N 22ND STREET	5
857148	904	4619 N 10TH STREET	3
857153	904	4752 N 09TH STREET	3
857157	904	4746 N WARNOCK ST	3
857180	904	4522 N WARNOCK ST	3
857320	904	911 W WYOMING AVE	3
857342	904	4619 N HUTCHINSON ST	3

Unit ID	Project #	Unit Address	BR
857343	904	4625 N HUTCHINSON ST	3
857346	904	4555 N WARNOCK ST	4
857373	904	4641 N WARNOCK ST	3
857416	904	4744 N MARSHALL ST	3
857431	904	4622 N 09TH STREET	3
888554	904	344 W PENN ST	4
888663	904	324 W INDIANA AVE	3
888668	904	2968 N 04TH STREET	6
888694	904	3138 N 08TH STREET	3
888844	904	4611 N WARNOCK ST	3
916076	904	3105 N 10TH STREET	3
926701	904	1750 BELFIELD AVE	3
926781	904	2054 E WILLIAM ST	2
976168	904	3250 N RANDOLPH ST	2
976252	904	4714 N 07TH STREET	3
690680	901	5042 HOOPEs ST	3
690681	901	5068 HOOPEs ST	3
042329	903	1007 S 20TH STREET	3
042330	903	1007 S 20TH STREET	4
042331	903	1009 S 20TH STREET	3
042332	903	1009 S 20TH STREET	4
042333	903	1011 S 20TH STREET	3
042334	903	1011 S 20TH STREET	4
125388	903	2639 GERRITT ST	3
125533	903	1239 S HANSON ST	2
125534	903	1237 S HANSON ST	3
125638	903	1248 S HANSON ST	2
125649	903	1236 S HANSON ST	2
125672	903	1246 S HANSON ST	2
125794	903	636 HOFFMAN ST	3
125846	903	1250 S HANSON ST	2
691280	903	1915 CHRISTIAN ST	6
803990	903	1012 S 20TH STREET	3
803991	903	1012 S 20TH STREET	4
804455	903	1010 S 20TH STREET	6
804725	903	704 S 19TH STREET	6
818389	903	605 EMILY ST	4
857545	903	2144 S CECIL ST	2
888765	903	1052 S PAXON ST	3
888861	903	6055 REINHART ST	3

Unit ID	Project #	Unit Address	BR
041534	907	2123 N 08TH STREET	5
041541	907	1951 N MARSHALL ST	5
041551	907	1432 N MARSHALL ST	4
041583	907	1439 N 08TH STREET	3
041584	907	1439 N 08TH STREET	2
041585	907	1439 N 08TH STREET	2
041599	907	1955 N 07TH STREET	2
041600	907	1955 N 07TH STREET	6
041610	907	1400 N FRANKLIN ST	4
041611	907	1400 N FRANKLIN ST	4
041662	907	1418 N FRANKLIN ST	6
041687	907	1902 N FRANKLIN ST	4
041688	907	1902 N FRANKLIN ST	4
041717	907	605 W MONTGOMERY AVE	5
041736	907	1331 N 07TH STREET	3
041737	907	1331 N 07TH STREET	3
041738	907	1331 N 07TH STREET	2
041747	907	1915 N 08TH STREET	3
041748	907	1915 N 08TH STREET	4
041764	907	1900 N FRANKLIN ST	3
041765	907	1900 N FRANKLIN ST	3
041766	907	1900 N FRANKLIN ST	3
041777	907	2007 N MARSHALL ST	5
041779	907	2142 N MARSHALL ST	4
041785	907	1939 N 08TH STREET	3
041786	907	1939 N 08TH STREET	4
041812	907	2027 N MARSHALL ST	5
041815	907	928 W YORK ST	4
041827	907	1945 N 08TH STREET	3
041828	907	1945 N 08TH STREET	4
041835	907	1926 N FRANKLIN ST	2
041836	907	1926 N FRANKLIN ST	6
041849	907	1548 N 06TH STREET	3
041850	907	1548 N 06TH STREET	2
041851	907	1550 N 06TH STREET	3
041852	907	1550 N 06TH STREET	2
041857	907	1338 N FRANKLIN ST	3
041858	907	1338 N FRANKLIN ST	3
041859	907	1338 N FRANKLIN ST	3
041874	907	1943 N 08TH STREET	2

Unit ID	Project #	Unit Address	BR
041875	907	1943 N 08TH STREET	6
041878	907	1542 N 07TH STREET	2
041879	907	1542 N 07TH STREET	6
041885	907	1946 N FRANKLIN ST	2
041886	907	1946 N FRANKLIN ST	5
041897	907	1907 N 08TH STREET	2
041898	907	1907 N 08TH STREET	5
041969	907	942 N 12TH STREET	4
041972	907	1808 N FRANKLIN ST	3
041973	907	1808 N FRANKLIN ST	2
041974	907	1808 N FRANKLIN ST	3
041975	907	2122 N FRANKLIN ST	4
042002	907	1720 N 06TH STREET	2
042003	907	1720 N 06TH STREET	6
042004	907	1936 N FRANKLIN ST	2
042005	907	1936 N FRANKLIN ST	3
042006	907	1936 N FRANKLIN ST	3
042007	907	2318 N 13TH STREET	2
042008	907	2318 N 13TH STREET	6
042028	907	2332 N 13TH STREET	2
042029	907	2332 N 13TH STREET	6
042034	907	1430 N MARSHALL ST	4
042039	907	1718 N 06TH STREET	2
042040	907	1718 N 06TH STREET	6
042046	907	1323 N MARSHALL ST	2
042047	907	1323 N MARSHALL ST	4
042048	907	1443 N 08TH STREET	4
042058	907	1339 N 08TH STREET	6
042059	907	2353 N 10TH STREET	5
042069	907	2340 N 13TH STREET	3
042070	907	2340 N 13TH STREET	3
042071	907	2340 N 13TH STREET	1
042078	907	2048 N 07TH STREET	6
042113	907	1716 N 06TH STREET	2
042114	907	1716 N 06TH STREET	6
042115	907	1818 N FRANKLIN ST	2
042116	907	1818 N FRANKLIN ST	6
042130	907	1712 N 06TH STREET	2
042131	907	1712 N 06TH STREET	6
042132	907	1714 N 06TH STREET	2

Unit ID	Project #	Unit Address	BR
042133	907	1714 N 06TH STREET	6
042135	907	1715 N FRANKLIN ST	2
042136	907	1715 N FRANKLIN ST	3
042137	907	1715 N FRANKLIN ST	3
042138	907	2351 N 10TH STREET	5
042139	907	2547 N 11TH STREET	5
042159	907	2034 N FRANKLIN ST	5
042166	907	2411 N 10TH STREET	5
042181	907	1532 N 08TH STREET	2
042182	907	1532 N 08TH STREET	6
042193	907	1550 N DARIEN ST	2
042196	907	1319 N MARSHALL ST	2
042197	907	1319 N MARSHALL ST	5
042208	907	1324 N MARSHALL ST	2
042209	907	1324 N MARSHALL ST	6
042229	907	1524 N MARSHALL ST	2
042230	907	1524 N MARSHALL ST	3
042233	907	1904 N FRANKLIN ST	2
042234	907	1904 N FRANKLIN ST	5
042248	907	1737 N FRANKLIN ST	3
042249	907	1737 N FRANKLIN ST	3
042250	907	1737 N FRANKLIN ST	3
042270	907	1435 N 07TH STREET	1
042271	907	1435 N 07TH STREET	5
042272	907	1437 N 07TH STREET	1
042273	907	1437 N 07TH STREET	5
042300	907	2507 N 11TH STREET	5
042313	907	1706 N 06TH STREET	2
042314	907	1706 N 06TH STREET	6
042315	907	1708 N 06TH STREET	2
042316	907	1708 N 06TH STREET	6
042317	907	1710 N 06TH STREET	2
042318	907	1710 N 06TH STREET	6
042319	907	1836 N FRANKLIN ST	6
042348	907	1921 N 08TH STREET	2
042349	907	1921 N 08TH STREET	6
042369	907	1325 N MARSHALL ST	2
042370	907	1325 N MARSHALL ST	4
042371	907	1916 N 08TH STREET	1
042372	907	1916 N 08TH STREET	5

Unit ID	Project #	Unit Address	BR
042382	907	1539 N 09TH STREET	4
042400	907	1919 N 07TH STREET	4
042401	907	1919 N 07TH STREET	5
042404	907	1824 N 06TH STREET	5
042408	907	611 W JEFFERSON ST	3
042453	907	1939 N 09TH STREET	4
042456	907	2148 N MARSHALL ST	4
042457	907	1814 N FRANKLIN ST	3
042458	907	1814 N FRANKLIN ST	3
042459	907	1814 N FRANKLIN ST	3
042460	907	1935 N 09TH STREET	4
042490	907	1401 N PERTH ST	4
042498	907	1724 N 06TH STREET	2
042499	907	1724 N 06TH STREET	6
042500	907	2330 N 13TH STREET	2
042501	907	2330 N 13TH STREET	6
042510	907	741 W MONTGOMERY AVE	5
042511	907	1806 N FRANKLIN ST	3
042512	907	1806 N FRANKLIN ST	2
042513	907	1806 N FRANKLIN ST	3
042527	907	732 W MASTER ST	4
042534	907	1722 N 06TH STREET	2
042535	907	1722 N 06TH STREET	6
042548	907	1919 N 08TH STREET	1
042549	907	1919 N 08TH STREET	5
042561	907	1812 N FRANKLIN ST	3
042562	907	1812 N FRANKLIN ST	3
042563	907	1812 N FRANKLIN ST	3
042564	907	1816 N FRANKLIN ST	3
042565	907	1816 N FRANKLIN ST	3
042566	907	1816 N FRANKLIN ST	3
042567	907	1820 N FRANKLIN ST	2
042568	907	1820 N FRANKLIN ST	2
042569	907	1820 N FRANKLIN ST	3
042570	907	1830 N FRANKLIN ST	1
042571	907	1830 N FRANKLIN ST	5
042572	907	2500 N ALDER ST	2
042616	907	1810 N MARSHALL ST	4
042651	907	711 W BERKS ST	5
042667	907	2627 N 13TH STREET	5

Unit ID	Project #	Unit Address	BR
042668	907	1828 N FRANKLIN ST	3
042669	907	1828 N FRANKLIN ST	4
042685	907	2336 N 13TH STREET	1
042686	907	2336 N 13TH STREET	4
042698	907	1525 N MARSHALL ST	3
042699	907	1525 N MARSHALL ST	3
042700	907	1525 N MARSHALL ST	3
042701	907	1617 N MARSHALL ST	2
042702	907	1617 N MARSHALL ST	4
042714	907	1704 N 06TH STREET	1
042715	907	1704 N 06TH STREET	4
042757	907	2132 N MARSHALL ST	4
042766	907	1407 N PERTH ST	4
042767	907	1409 N PERTH ST	4
042768	907	1411 N PERTH ST	4
042782	907	1834 N FRANKLIN ST	2
042783	907	1834 N FRANKLIN ST	6
042809	907	2510 N 11TH STREET	6
042845	907	1528 N 06TH STREET	2
042846	907	1528 N 06TH STREET	6
042888	907	1303 N MARSHALL ST	2
042889	907	1303 N MARSHALL ST	6
042913	907	734 W MASTER ST	5
042952	907	1638 N MARSHALL ST	2
042953	907	1638 N MARSHALL ST	5
042954	907	1505 N FRANKLIN ST	5
042970	907	1015 W ARIZONA ST	2
043033	907	1406 N 07TH STREET	4
043138	907	1711 N FRANKLIN ST	3
043139	907	1711 N FRANKLIN ST	3
043140	907	1711 N FRANKLIN ST	3
043141	907	2338 N 13TH STREET	1
043142	907	2338 N 13TH STREET	5
043152	907	1835 N 08TH STREET	6
043158	907	1518 N DARIEN ST	2
043169	907	701 W JEFFERSON ST	4
043178	907	1644 N MARSHALL ST	3
043179	907	1644 N MARSHALL ST	3
043194	907	1410 N FRANKLIN ST	3
043195	907	1410 N FRANKLIN ST	3

Unit ID	Project #	Unit Address	BR
043196	907	1519 N FRANKLIN ST	2
043197	907	1519 N FRANKLIN ST	3
043198	907	1519 N FRANKLIN ST	3
043210	907	1432 N 07TH STREET	2
043211	907	1432 N 07TH STREET	3
043212	907	1432 N 07TH STREET	3
043225	907	1822 N FRANKLIN ST	2
043226	907	1822 N FRANKLIN ST	6
043227	907	1824 N FRANKLIN ST	2
043228	907	1824 N FRANKLIN ST	6
043229	907	2346 N 09TH STREET	2
043230	907	2346 N 09TH STREET	3
043240	907	1647 N 07TH STREET	3
043241	907	1647 N 07TH STREET	3
043242	907	1545 N FRANKLIN ST	3
043243	907	1545 N FRANKLIN ST	4
043271	907	1624 N MARSHALL ST	3
043272	907	1624 N MARSHALL ST	3
043273	907	2348 N 10TH STREET	3
043274	907	2348 N 10TH STREET	3
043275	907	2348 N 10TH STREET	3
043309	907	1934 N 08TH STREET	5
043336	907	639 W OXFORD ST	4
043337	907	639 W OXFORD ST	4
043362	907	633 W OXFORD ST	3
043363	907	633 W OXFORD ST	4
043378	907	1739 N FRANKLIN ST	3
043379	907	1739 N FRANKLIN ST	3
043380	907	1739 N FRANKLIN ST	3
043386	907	1404 N FRANKLIN ST	5
043391	907	2342 N 13TH STREET	3
043392	907	2342 N 13TH STREET	3
043413	907	1615 N 07TH STREET	3
043414	907	1615 N 07TH STREET	3
043442	907	2438 N PARK AVE	6
043467	907	1404 N MARSHALL ST	2
043468	907	1404 N MARSHALL ST	6
043492	907	2504 N 10TH STREET	5
043494	907	2316 N 13TH STREET	2
043495	907	2316 N 13TH STREET	6

Unit ID	Project #	Unit Address	BR
043498	907	1653 N 07TH STREET	3
043499	907	1653 N 07TH STREET	3
043522	907	2322 N 13TH STREET	6
043535	907	2310 N 13TH STREET	2
043536	907	2310 N 13TH STREET	6
043550	907	1234 W HUNTINGDON ST	3
043551	907	1234 W HUNTINGDON ST	3
043630	907	906 W SUSQUEHANNA AVE	5
043638	907	1705 N MARSHALL ST	4
043696	907	2314 N 13TH STREET	2
043697	907	2314 N 13TH STREET	4
043698	907	2350 N 13TH STREET	1
043699	907	2350 N 13TH STREET	4
043705	907	1932 N 06TH STREET	4
043706	907	1932 N 06TH STREET	4
043707	907	1652 N MARSHALL ST	4
043708	907	1652 N MARSHALL ST	3
043732	907	1514 N MARSHALL ST	3
043733	907	1514 N MARSHALL ST	3
043734	907	1514 N MARSHALL ST	3
043747	907	628 CECIL B MOORE AVE	5
043749	907	1939 N 07TH STREET	3
043750	907	1939 N 07TH STREET	3
043751	907	1939 N 07TH STREET	3
043830	907	1654 N MARSHALL ST	3
043831	907	1654 N MARSHALL ST	3
043868	907	1733 N FRANKLIN ST	3
043869	907	1733 N FRANKLIN ST	6
043871	907	2312 N 13TH STREET	3
043872	907	2312 N 13TH STREET	3
043884	907	1327 N 08TH STREET	2
043885	907	1327 N 08TH STREET	5
043905	907	1620 N MARSHALL ST	3
043906	907	1620 N MARSHALL ST	3
043958	907	1922 N 08TH STREET	5
124826	907	2145 N 07TH STREET	5
124838	907	1924 N 08TH STREET	6
124848	907	2344 N 13TH STREET	3
124849	907	2344 N 13TH STREET	4
124929	907	1518 N MARSHALL ST	4

Unit ID	Project #	Unit Address	BR
124930	907	1518 N MARSHALL ST	4
124932	907	2207 N 07TH STREET	5
125031	907	1210 N 07TH STREET	5
125032	907	1210 N 07TH STREET	5
125060	907	1330 N FRANKLIN ST	5
125061	907	1330 N FRANKLIN ST	5
125062	907	2257 N CAMAC ST	4
125073	907	2439 N 10TH STREET	6
125098	907	1445 N 07TH STREET	3
125099	907	1445 N 07TH STREET	4
125164	907	606 CECIL B MOORE AVE	4
125165	907	608 CECIL B MOORE AVE	4
125172	907	1507 N FRANKLIN ST	5
125211	907	2203 N FRANKLIN ST	3
125227	907	2229 N FRANKLIN ST	5
125265	907	2212 N FRANKLIN ST	6
125307	907	2523 N 11TH STREET	5
125322	907	2254 N CAMAC ST	4
125399	907	1222 W YORK ST	3
125449	907	2527 N 11TH STREET	5
125462	907	2449 N PARK AVE	5
125498	907	2503 N 11TH STREET	5
125532	907	2328 N FAWN ST	3
125558	907	611 CECIL B MOORE AVE	4
125565	907	908 W SUSQUEHANNA AVE	5
125593	907	1626 N MARSHALL ST	6
125604	907	2243 N FRANKLIN ST	6
125620	907	1423 N 08TH STREET	6
125659	907	608 W NORRIS ST	5
125669	907	1436 N FRANKLIN ST	6
125680	907	2144 N FRANKLIN ST	4
125694	907	1547 N 09TH STREET	5
125733	907	1634 N MARSHALL ST	6
125734	907	2108 N PERCY ST	2
125745	907	2330 N FAWN ST	3
125751	907	2148 N 08TH STREET	5
125763	907	728 W NORRIS ST	6
125802	907	1849 N FRANKLIN ST	6
125841	907	2024 N FRANKLIN ST	5
255981	907	2226 N 07TH STREET	5

Unit ID	Project #	Unit Address	BR
690190	907	1927 N FRANKLIN ST	3
690191	907	1927 N FRANKLIN ST	4
690194	907	1925 N FRANKLIN ST	3
690195	907	1925 N FRANKLIN ST	4
690215	907	2511 N 11TH STREET	2
690216	907	2511 N 11TH STREET	3
690250	907	1920 N FRANKLIN ST	4
690251	907	1920 N FRANKLIN ST	4
690252	907	1427 N 07TH STREET	6
690259	907	2125 N 09TH STREET	5
690261	907	1942 N FRANKLIN ST	3
690262	907	1942 N FRANKLIN ST	4
690263	907	1948 N FRANKLIN ST	3
690264	907	1948 N FRANKLIN ST	3
690309	907	2139 N 09TH STREET	5
690310	907	2145 N 09TH STREET	5
690320	907	1810 N FRANKLIN ST	3
690321	907	1810 N FRANKLIN ST	2
690322	907	1810 N FRANKLIN ST	3
690333	907	2135 N 09TH STREET	5
690356	907	2453 N 10TH STREET	2
690357	907	2453 N 10TH STREET	3
690375	907	1923 N FRANKLIN ST	3
690376	907	1923 N FRANKLIN ST	4
690443	907	1934 N FRANKLIN ST	2
690444	907	1934 N FRANKLIN ST	3
690445	907	1934 N FRANKLIN ST	3
690523	907	2138 N 07TH STREET	5
690528	907	2140 N 07TH STREET	5
690529	907	2142 N 07TH STREET	4
690944	907	2057 N 08TH STREET	5
691032	907	2152 N 07TH STREET	4
691101	907	2606 N WARNOCK ST	3
691111	907	2206 N 07TH STREET	5
691392	907	2154 N 07TH STREET	5
691446	907	2508 N 11TH STREET	5
804006	907	1601 N MARSHALL ST	5
804009	907	1617 N 07TH STREET	3
804010	907	1617 N 07TH STREET	3
804011	907	1629 N 07TH STREET	4

Unit ID	Project #	Unit Address	BR
804012	907	1629 N 07TH STREET	3
804025	907	1923 N 08TH STREET	3
804026	907	1923 N 08TH STREET	5
804053	907	1649 N 08TH STREET	3
804054	907	1649 N 08TH STREET	3
804070	907	1612 N 06TH STREET	3
804071	907	1612 N 06TH STREET	3
804088	907	1949 N 08TH STREET	3
804089	907	1949 N 08TH STREET	4
804151	907	1450 N FRANKLIN ST	3
804152	907	1450 N FRANKLIN ST	4
804160	907	626 CECIL B MOORE AVE	4
804178	907	1631 N 07TH STREET	2
804179	907	1631 N 07TH STREET	5
804192	907	1341 N 07TH STREET	3
804193	907	1341 N 07TH STREET	3
804194	907	1623 N 07TH STREET	2
804195	907	1623 N 07TH STREET	5
804205	907	1428 N 07TH STREET	3
804206	907	1428 N 07TH STREET	3
804207	907	1428 N 07TH STREET	3
804263	907	1950 N 08TH STREET	3
804264	907	1950 N 08TH STREET	3
804311	907	724 W NORRIS ST	2
804312	907	724 W NORRIS ST	4
804313	907	1640 N FRANKLIN ST	3
804314	907	1640 N FRANKLIN ST	3
804315	907	1640 N FRANKLIN ST	3
804324	907	1511 N FRANKLIN ST	3
804325	907	1511 N FRANKLIN ST	3
804326	907	1511 N FRANKLIN ST	3
804408	907	2143 N 07TH STREET	6
804409	907	1445 N FRANKLIN ST	5
804415	907	1906 N FRANKLIN ST	4
804416	907	1906 N FRANKLIN ST	4
804428	907	1805 N 08TH STREET	6
804445	907	2010 N MARSHALL ST	6
804446	907	2010 N MARSHALL ST	4
804456	907	2346 N 13TH STREET	1
804457	907	2346 N 13TH STREET	4

Unit ID	Project #	Unit Address	BR
804476	907	1431 N FRANKLIN ST	4
804477	907	1431 N FRANKLIN ST	5
804480	907	2348 N 13TH STREET	1
804481	907	2348 N 13TH STREET	4
804487	907	2354 N 13TH STREET	2
804488	907	2354 N 13TH STREET	4
804493	907	1636 N MARSHALL ST	6
804584	907	940 N 12TH STREET	5
804588	907	1918 N FRANKLIN ST	3
804589	907	1918 N FRANKLIN ST	2
804590	907	1918 N FRANKLIN ST	3
804594	907	1927 N 07TH STREET	3
804595	907	1927 N 07TH STREET	5
804596	907	2356 N 13TH STREET	3
804597	907	2356 N 13TH STREET	3
804646	907	1228 N MARSHALL ST	3
804647	907	1228 N MARSHALL ST	3
804648	907	1228 N MARSHALL ST	3
804671	907	1406 N FRANKLIN ST	5
804704	907	1926 N 08TH STREET	1
804705	907	1926 N 08TH STREET	4
804708	907	606 W NORRIS ST	5
804712	907	2610 N 11TH STREET	3
804713	907	2610 N 11TH STREET	4
804719	907	2260 N 12TH STREET	5
804724	907	2248 N CAMAC ST	3
804737	907	2139 N FRANKLIN ST	5
804738	907	2531 N 11TH STREET	5
804739	907	2218 N CAMAC ST	6
804748	907	1613 N MARSHALL ST	2
804749	907	1613 N MARSHALL ST	3
818052	907	722 W NORRIS ST	6
818070	907	1824 N MARSHALL ST	4
818091	907	1548 N 07TH STREET	6
818164	907	631 DIAMOND ST	6
818173	907	1739 N MARSHALL ST	4
818208	907	1516 N 06TH STREET	6
818218	907	1341 N 08TH STREET	6
818397	907	2239 N CAMAC ST	6
818412	907	2256 N CAMAC ST	4

Unit ID	Project #	Unit Address	BR
888603	907	2253 N CAMAC ST	4
888629	907	2615 N 11TH STREET	5
041605	902	759 N 38TH STREET	5
041606	902	761 N 38TH STREET	5
041789	902	3841 MT VERNON ST	4
041796	902	3900 PARRISH ST	4
042095	902	754 N 38TH STREET	3
042283	902	813 N 40TH STREET	1
042284	902	813 N 40TH STREET	6
042752	902	3837 BRANDYWINE ST	4
042841	902	3907 FAIRMOUNT AVE	3
042842	902	3907 FAIRMOUNT AVE	3
043081	902	751 N 39TH STREET	2
043082	902	751 N 39TH STREET	4
043118	902	825 N 40TH STREET	2
043119	902	825 N 40TH STREET	4
043131	902	813 N 42ND STREET	3
043316	902	723 N 35TH STREET	2
043317	902	723 N 35TH STREET	4
043326	902	764 N 41ST STREET	4
043327	902	764 N 41ST STREET	4
043533	902	3824 HAVERFORD AVE	3
043663	902	806 N MAY ST	2
043664	902	810 N MAY ST	2
043954	902	626 N 36TH STREET	5
124924	902	3847 HAVERFORD AVE	6
125118	902	714 N 34TH STREET	6
125331	902	3830 BROWN ST	5
125816	902	4234 W STILES ST	5
125844	902	4223 VIOLA ST	6
125893	902	3814 BROWN ST	5
255950	902	763 N 38TH STREET	5
690731	902	839 JUNE ST	2
690788	902	3828 MT VERNON ST	3
690823	902	872 N MARKOE ST	3
690828	902	637 N 36TH STREET	5
690877	902	3815 MT VERNON ST	5
690879	902	866 N MARKOE ST	3
690909	902	635 N 36TH STREET	5
690910	902	640 N 36TH STREET	5

Unit ID	Project #	Unit Address	BR
690917	902	818 N 47TH STREET	3
690926	902	638 N 36TH STREET	5
690938	902	625 N 36TH STREET	5
690940	902	4508 OGDEN ST	3
690941	902	4513 OGDEN ST	3
691015	902	3833 MT VERNON ST	5
691117	902	3805 BROWN ST	3
691351	902	819 N 45TH STREET	5
691358	902	3926 FOLSOM ST	5
804098	902	3911 MT VERNON ST	4
804167	902	727 N 35TH STREET	2
804168	902	727 N 35TH STREET	4
804536	902	756 N 41ST STREET	3
804537	902	756 N 41ST STREET	3
804538	902	756 N 41ST STREET	2
818149	902	807 PRESTON ST	5
818513	902	4104 WESTMINSTER AVE	6
818517	902	3924 FOLSOM ST	5
818545	902	881 N MARKOE ST	3
818551	902	855 N 46TH STREET	3
888574	902	637 N 44TH STREET	5
888579	902	4018 BROWN ST	6
888601	902	757 N 38TH STREET	5
888617	902	738 N BROOKLYN ST	3
888618	902	740 N BROOKLYN ST	3
888677	902	4203 MANTUA AVE	4
041513	910	1747 N LAMBERT ST	5
041517	910	2407 REDNER ST	4
041667	910	1411 N 22ND STREET	5
041685	910	1736 N HOLLYWOOD ST	2
041696	910	2429 BOLTON WAY	4
041697	910	2431 BOLTON WAY	4
041830	910	2230 INGERSOLL ST	4
041980	910	2223 STEWART ST	2
041992	910	2145 SHARSWOOD ST	5
041993	910	2147 SHARSWOOD ST	5
041994	910	2149 SHARSWOOD ST	5
041995	910	2429 NICHOLAS ST	5
042052	910	2436 REDNER ST	4
042171	910	2138 HARLAN ST	2

Unit ID	Project #	Unit Address	BR
042172	910	2140 HARLAN ST	2
042226	910	2302 STEWART ST	2
042227	910	2308 STEWART ST	2
042228	910	2330 STEWART ST	2
042326	910	1509 N MARSTON ST	3
042388	910	2218 INGERSOLL ST	5
042392	910	1526 N 24TH STREET	5
042417	910	1627 N 21ST STREET	5
042426	910	2417 REDNER ST	4
042429	910	2415 CLIFFORD ST	6
042494	910	1718 N 22ND STREET	3
042495	910	1718 N 22ND STREET	3
042496	910	1511 N MARSTON ST	3
042552	910	2417 N COLLEGE AVE	2
042553	910	2417 N COLLEGE AVE	6
042601	910	2136 W JEFFERSON ST	5
042637	910	1205 N ETTING ST	2
042677	910	2343 W MASTER ST	4
042691	910	2042 NICHOLAS ST	4
042730	910	1216 N PENNOCK ST	2
042748	910	2426 REDNER ST	4
042819	910	2313 HARLAN ST	2
042820	910	2324 HARLAN ST	2
042837	910	2320 STEWART ST	2
042838	910	2423 STEWART ST	2
042975	910	2024 SEYBERT ST	2
042991	910	1551 N MARSTON ST	3
043005	910	2512 HARLAN ST	2
043006	910	2514 HARLAN ST	2
043010	910	2455 TURNER ST	3
043011	910	2455 TURNER ST	3
043049	910	1236 N 27TH STREET	6
043175	910	1407 N 28TH STREET	5
043185	910	2342 STEWART ST	2
043206	910	1747 N 31ST STREET	3
043207	910	1747 N 31ST STREET	3
043284	910	1921 TURNER ST	4
043286	910	2511 HARLAN ST	3
043300	910	2419 N COLLEGE AVE	4
043301	910	2419 N COLLEGE AVE	5

Unit ID	Project #	Unit Address	BR
043313	910	1439 N MARSTON ST	2
043325	910	2314 SHARSWOOD ST	4
043331	910	1229 N ETTING ST	3
043354	910	2221 STEWART ST	2
043410	910	1419 N MYRTLEWOOD ST	2
043431	910	2437 BOLTON WAY	4
043447	910	1527 N 22ND STREET	5
043474	910	1740 N NATRONA ST	5
043484	910	2204 INGERSOLL ST	5
043489	910	2338 W MONTGOMERY AVE	5
043529	910	3211 CECIL B MOORE AVE	3
043530	910	3211 CECIL B MOORE AVE	3
043531	910	3211 CECIL B MOORE AVE	3
043625	910	2721 W GEORGE ST	2
043691	910	1400 N MARSTON ST	5
043692	910	1715 N 31ST STREET	5
043702	910	2707 W GEORGE ST	2
043781	910	2409 BOLTON WAY	4
043782	910	2413 BOLTON WAY	4
043836	910	1451 N MARSTON ST	2
043950	910	1716 N BONSALL ST	4
043952	910	3123 CECIL B MOORE AVE	2
043953	910	3123 CECIL B MOORE AVE	5
043969	910	2423 N COLLEGE AVE	3
043970	910	2423 N COLLEGE AVE	3
043971	910	2423 N COLLEGE AVE	3
124818	910	1303 N 24TH STREET	5
124824	910	2401 HARLAN ST	5
124844	910	2410 REDNER ST	4
124853	910	2131 SHARSWOOD ST	4
124854	910	1412 N 27TH STREET	4
124855	910	1919 TURNER ST	4
124878	910	1405 N 28TH STREET	5
124905	910	1270 N DOVER ST	6
124983	910	1519 N MARSTON ST	3
125001	910	2024 NICHOLAS ST	4
125021	910	2119 SHARSWOOD ST	4
125057	910	2232 INGERSOLL ST	5
125144	910	2134 W JEFFERSON ST	4
125159	910	2008 S COLLEGE AVE	5

Unit ID	Project #	Unit Address	BR
125176	910	2026 NICHOLAS ST	4
125191	910	2402 BOLTON WAY	4
125217	910	1619 N 21ST STREET	5
125255	910	2431 STEWART ST	2
125273	910	1430 N MYRTLEWOOD ST	2
125293	910	1742 N NATRONA ST	5
125349	910	1507 N 25TH STREET	5
125372	910	2224 W JEFFERSON ST	3
125391	910	1323 N 23RD STREET	4
125411	910	1458 N MARSTON ST	2
125497	910	1239 N 30TH STREET	2
125507	910	3041 W HARPER ST	3
125516	910	2437 NICHOLAS ST	5
125524	910	2311 HARLAN ST	2
125544	910	1416 N MARSTON ST	2
125545	910	1923 TURNER ST	4
125584	910	2336 STEWART ST	2
125618	910	2415 W OXFORD ST	6
125640	910	1428 N MARSTON ST	2
125643	910	1434 N MARSTON ST	2
125665	910	1223 N MYRTLEWOOD ST	3
125701	910	1746 N LAMBERT ST	3
125715	910	2429 INGERSOLL ST	2
125723	910	2437 INGERSOLL ST	2
125728	910	2441 INGERSOLL ST	2
125738	910	1415 N MARSTON ST	2
125756	910	2411 INGERSOLL ST	2
125757	910	2416 INGERSOLL ST	2
125776	910	1462 N MYRTLEWOOD ST	3
125810	910	2419 REDNER ST	4
125821	910	1526 N 20TH STREET	5
125822	910	2427 INGERSOLL ST	2
125864	910	1235 N 30TH STREET	2
125878	910	920 N 30TH STREET	3
125928	910	1446 N 27TH STREET	4
125931	910	1426 N MYRTLEWOOD ST	2
255954	910	2412 REDNER ST	4
690011	910	1608 N NEWKIRK ST	3
690023	910	1242 N DOVER ST	3
690056	910	1246 N DOVER ST	3

Unit ID	Project #	Unit Address	BR
690119	910	2430 CLIFFORD ST	5
690255	910	2140 W JEFFERSON ST	5
690268	910	1508 N 24TH STREET	5
690406	910	1236 N DOVER ST	3
690428	910	2448 NASSAU ST	2
690462	910	2711 CABOT ST	3
690612	910	2424 CLIFFORD ST	6
690628	910	1757 N LAMBERT ST	3
690684	910	1216 N 30TH STREET	6
690685	910	2425 CECIL B MOORE AVE	6
690724	910	1743 N LAMBERT ST	3
690816	910	1232 N DOVER ST	3
690882	910	1234 N 27TH STREET	5
690981	910	2425 CLIFFORD ST	5
691034	910	1310 N 23RD STREET	5
691058	910	2438 CLIFFORD ST	6
803998	910	2237 W THOMPSON ST	3
803999	910	2237 W THOMPSON ST	4
804044	910	2430 REDNER ST	4
804256	910	2702 W GEORGE ST	2
804257	910	2705 W GEORGE ST	2
804258	910	2709 W GEORGE ST	2
804259	910	2710 W GEORGE ST	2
804282	910	2704 W GEORGE ST	2
804283	910	2708 W GEORGE ST	2
804290	910	2712 W GEORGE ST	2
804318	910	2714 W GEORGE ST	2
804379	910	2351 N COLLEGE AVE	3
804380	910	2351 N COLLEGE AVE	6
804396	910	1515 N 25TH STREET	1
804397	910	1515 N 25TH STREET	5
804398	910	2726 W GEORGE ST	2
804399	910	2727 W GEORGE ST	2
804400	910	2729 W GEORGE ST	2
804406	910	2725 W GEORGE ST	2
804438	910	2711 W GEORGE ST	2
804439	910	2715 W GEORGE ST	2
804440	910	2717 W GEORGE ST	2
804441	910	2723 W GEORGE ST	2
804547	910	1738 N 20TH STREET	3

Unit ID	Project #	Unit Address	BR
804548	910	1738 N 20TH STREET	3
804572	910	3128 CLIFFORD ST	1
804573	910	3128 CLIFFORD ST	4
804576	910	1300 N DOVER ST	6
804745	910	2231 W OXFORD ST	5
804757	910	1460 N MARSTON ST	2
804765	910	2000 W OXFORD ST	2
804766	910	2000 W OXFORD ST	1
804767	910	2000 W OXFORD ST	3
818130	910	2431 CLIFFORD ST	6
818202	910	2928 W MASTER ST	4
818303	910	1706 N 27TH STREET	5
818326	910	2436 CECIL B MOORE AVE	6
818327	910	2447 NICHOLAS ST	5
818363	910	2050 W MASTER ST	5
888642	910	1715 N 26TH STREET	6
888809	910	2449 NICHOLAS ST	5
041504	909	1938 N TAYLOR ST	3
041507	909	2010 W NORRIS ST	5
041508	909	2016 W NORRIS ST	4
041509	909	2003 W NORRIS ST	5
041521	909	2042 W NORRIS ST	2
041522	909	2042 W NORRIS ST	6
041523	909	1830 N 26TH STREET	5
041536	909	2044 W NORRIS ST	2
041537	909	2044 W NORRIS ST	6
041573	909	1936 N TAYLOR ST	3
041582	909	2015 N 21ST STREET	5
041598	909	2101 N WOODSTOCK ST	5
041632	909	2026 N 18TH STREET	5
041642	909	1903 N 32ND STREET	5
041666	909	2009 N 21ST STREET	5
041755	909	2010 N WOODSTOCK ST	5
041758	909	2156 N MARSTON ST	3
041759	909	2007 N 21ST STREET	5
041793	909	2031 DIAMOND ST	3
041794	909	2031 DIAMOND ST	3
041795	909	2031 DIAMOND ST	3
041824	909	2037 N 19TH STREET	2
041825	909	2037 N 19TH STREET	6

Unit ID	Project #	Unit Address	BR
041892	909	2018 N 21ST STREET	3
041893	909	2018 N 21ST STREET	3
041894	909	2018 N 21ST STREET	3
041904	909	2031 N 22ND STREET	4
041905	909	2031 N 22ND STREET	5
041906	909	2031 N 22ND STREET	5
041921	909	1923 N 19TH STREET	2
041922	909	1923 N 19TH STREET	4
041979	909	3221 MONUMENT AVE	5
041986	909	2120 N 19TH STREET	6
042049	909	1908 N 18TH STREET	2
042050	909	1908 N 18TH STREET	6
042092	909	2010 N LAMBERT ST	5
042144	909	3219 MONUMENT AVE	5
042218	909	2018 DIAMOND ST	3
042219	909	2018 DIAMOND ST	4
042220	909	2018 DIAMOND ST	2
042265	909	2024 DIAMOND ST	3
042266	909	2024 DIAMOND ST	4
042267	909	2024 DIAMOND ST	2
042294	909	1904 MONUMENT AVE	3
042304	909	1823 N 21ST STREET	5
042306	909	2235 W NORRIS ST	3
042307	909	2235 W NORRIS ST	5
042373	909	2030 DIAMOND ST	2
042374	909	2030 DIAMOND ST	3
042375	909	2030 DIAMOND ST	3
042376	909	2027 W NORRIS ST	2
042377	909	2027 W NORRIS ST	6
042438	909	2007 DIAMOND ST	3
042439	909	2007 DIAMOND ST	4
042440	909	2007 DIAMOND ST	2
042441	909	2043 DIAMOND ST	3
042442	909	2043 DIAMOND ST	4
042443	909	2043 DIAMOND ST	2
042473	909	1807 N 18TH STREET	3
042474	909	1807 N 18TH STREET	4
042517	909	1937 N 18TH STREET	2
042518	909	1937 N 18TH STREET	5
042519	909	1914 DIAMOND ST	3

Unit ID	Project #	Unit Address	BR
042520	909	1914 DIAMOND ST	6
042540	909	3215 MONUMENT AVE	1
042541	909	3215 MONUMENT AVE	4
042599	909	1904 W NORRIS ST	1
042600	909	1904 W NORRIS ST	3
042644	909	2037 W NORRIS ST	3
042645	909	2037 W NORRIS ST	3
042646	909	2037 W NORRIS ST	2
042653	909	1840 N 18TH STREET	2
042654	909	1840 N 18TH STREET	3
042655	909	1840 N 18TH STREET	3
042658	909	2105 W NORRIS ST	2
042659	909	2105 W NORRIS ST	3
042660	909	2105 W NORRIS ST	3
042703	909	1943 N 19TH STREET	2
042704	909	1943 N 19TH STREET	4
042705	909	2005 N 22ND STREET	3
042706	909	2005 N 22ND STREET	4
042707	909	2005 N 22ND STREET	4
042708	909	2007 N 22ND STREET	3
042709	909	2007 N 22ND STREET	4
042710	909	2007 N 22ND STREET	4
042723	909	1904 N 21ST STREET	2
042724	909	1904 N 21ST STREET	4
042725	909	2107 W NORRIS ST	2
042726	909	2107 W NORRIS ST	3
042727	909	2107 W NORRIS ST	3
042790	909	1909 N 19TH STREET	4
042791	909	1909 N 19TH STREET	4
042792	909	2033 N 22ND STREET	4
042793	909	2033 N 22ND STREET	4
042794	909	2033 N 22ND STREET	4
042828	909	2103 W NORRIS ST	2
042829	909	2103 W NORRIS ST	3
042830	909	2103 W NORRIS ST	3
042834	909	1955 N 31ST STREET	5
042856	909	2112 N UBER ST	2
042857	909	2112 N UBER ST	6
042865	909	3044 W SUSQUEHANNA AVE	1
042866	909	3044 W SUSQUEHANNA AVE	4

Unit ID	Project #	Unit Address	BR
042880	909	1850 N 17TH STREET	2
042881	909	1850 N 17TH STREET	6
042902	909	2008 N 19TH STREET	3
042903	909	2008 N 19TH STREET	3
042974	909	2172 N DOVER ST	2
042996	909	1839 N 31ST STREET	5
043001	909	2108 N 16TH STREET	2
043002	909	2108 N 16TH STREET	5
043015	909	2031 W NORRIS ST	2
043016	909	2031 W NORRIS ST	5
043047	909	2003 DIAMOND ST	2
043048	909	2003 DIAMOND ST	6
043069	909	1936 N GRATZ ST	1
043070	909	1936 N GRATZ ST	4
043071	909	1936 N 21ST STREET	3
043072	909	1936 N 21ST STREET	6
043087	909	2102 W NORRIS ST	2
043088	909	2102 W NORRIS ST	3
043089	909	2102 W NORRIS ST	3
043111	909	2026 DIAMOND ST	3
043112	909	2026 DIAMOND ST	3
043113	909	2026 DIAMOND ST	3
043146	909	1913 N 18TH STREET	2
043147	909	1913 N 18TH STREET	6
043149	909	1942 N 31ST STREET	3
043204	909	1944 N 22ND STREET	3
043205	909	1944 N 22ND STREET	4
043247	909	1802 N 18TH STREET	2
043248	909	1802 N 18TH STREET	4
043249	909	1802 N 18TH STREET	3
043278	909	2009 N VAN PELT ST	3
043285	909	2011 N 21ST STREET	5
043324	909	2215 W MONTGOMERY AVE	5
043384	909	1737 W BERKS ST	3
043385	909	1737 W BERKS ST	4
043402	909	2112 N 16TH STREET	4
043403	909	2112 N 16TH STREET	5
043404	909	2120 N 16TH STREET	4
043405	909	2120 N 16TH STREET	4
043449	909	3014 W BERKS ST	1

Unit ID	Project #	Unit Address	BR
043450	909	3014 W BERKS ST	3
043454	909	1904 N 18TH STREET	2
043455	909	1904 N 18TH STREET	6
043485	909	1934 N 21ST STREET	3
043486	909	1934 N 21ST STREET	2
043487	909	1934 N 21ST STREET	3
043516	909	1833 N 21ST STREET	5
043560	909	2127 N 18TH STREET	4
043561	909	2127 N 18TH STREET	4
043619	909	1540 DIAMOND ST	4
043620	909	1540 DIAMOND ST	3
043621	909	1540 DIAMOND ST	4
043649	909	1717 W PAGE ST	2
043679	909	3101 EUCLID ST	4
043680	909	3101 EUCLID ST	4
043700	909	2036 W NORRIS ST	4
043701	909	2036 W NORRIS ST	4
043712	909	2034 W NORRIS ST	4
043713	909	2034 W NORRIS ST	4
043714	909	2038 W NORRIS ST	4
043715	909	2038 W NORRIS ST	4
043716	909	2104 W NORRIS ST	3
043717	909	2104 W NORRIS ST	3
043718	909	2104 W NORRIS ST	2
043724	909	3230 MONUMENT AVE	5
043741	909	2046 W NORRIS ST	2
043742	909	2046 W NORRIS ST	3
043743	909	2046 W NORRIS ST	3
043766	909	2004 N LAMBERT ST	5
043819	909	1851 N 19TH STREET	3
043820	909	1851 N 19TH STREET	3
043825	909	2111 W NORRIS ST	5
043826	909	2111 W NORRIS ST	4
043873	909	2002 N 17TH STREET	3
043874	909	2002 N 17TH STREET	4
043910	909	1941 N 19TH STREET	3
043911	909	1941 N 19TH STREET	3
043912	909	1941 N 19TH STREET	3
043918	909	2121 N 15TH STREET	1
043919	909	2121 N 15TH STREET	6

Unit ID	Project #	Unit Address	BR
043936	909	1930 N 21ST STREET	3
043937	909	1930 N 21ST STREET	3
043938	909	1930 N 21ST STREET	3
043967	909	2010 N 21ST STREET	2
043968	909	2010 N 21ST STREET	5
043986	909	2504 DIAMOND ST	4
043987	909	2504 DIAMOND ST	4
124828	909	2023 W MONTGOMERY AVE	5
124830	909	2330 W BERKS ST	6
124893	909	2024 W NORRIS ST	6
124903	909	1717 W NORRIS ST	4
124904	909	1717 W NORRIS ST	4
124922	909	1926 N 21ST STREET	4
124923	909	1926 N 21ST STREET	5
124944	909	1730 PAGE ST	4
124968	909	3103 EUCLID ST	5
124977	909	1722 FONTAIN ST	5
124993	909	2007 N VAN PELT ST	3
124996	909	2009 N 31ST STREET	5
125011	909	2025 W MONTGOMERY AVE	5
125022	909	1902 N 31ST STREET	6
125028	909	1926 W NORRIS ST	5
125034	909	2005 N 21ST STREET	5
125101	909	2036 N WOODSTOCK ST	5
125107	909	1729 W NORRIS ST	3
125108	909	1729 W NORRIS ST	4
125140	909	1906 W NORRIS ST	5
125197	909	1918 W NORRIS ST	2
125199	909	3227 MONUMENT AVE	5
125233	909	1935 W NORRIS ST	5
125284	909	2027 W MONTGOMERY AVE	5
125301	909	2026 N 31ST STREET	3
125312	909	2012 N 21ST STREET	4
125313	909	2012 N 21ST STREET	5
125345	909	3129 PAGE ST	5
125376	909	3216 MONUMENT AVE	5
125390	909	1902 N 32ND STREET	5
125403	909	2160 N MARSTON ST	3
125441	909	2008 N LAMBERT ST	5
125484	909	1840 N ETTING ST	2

Unit ID	Project #	Unit Address	BR
125520	909	2023 N 18TH STREET	6
125684	909	1964 N 31ST STREET	3
125870	909	1846 N ETTING ST	2
125890	909	3221 W BERKS ST	5
125903	909	1943 N 18TH STREET	5
125904	909	2023 N 19TH STREET	6
255946	909	1940 N 18TH STREET	3
255947	909	1940 N 18TH STREET	4
255948	909	1938 N 18TH STREET	3
255949	909	1938 N 18TH STREET	4
690071	909	1822 N 26TH STREET	5
690101	909	2012 DIAMOND ST	2
690102	909	2012 DIAMOND ST	3
690103	909	2012 DIAMOND ST	3
690105	909	2010 N 20TH STREET	5
690181	909	1932 N TAYLOR ST	3
690217	909	1914 N 18TH STREET	6
690305	909	2123 N STANLEY ST	3
690326	909	2005 DIAMOND ST	4
690327	909	2005 DIAMOND ST	4
690414	909	2009 N LAMBERT ST	5
690431	909	2008 DIAMOND ST	3
690432	909	2008 DIAMOND ST	4
690780	909	1842 N MARSTON ST	2
690783	909	1821 N MARSTON ST	2
690908	909	3226 MONUMENT AVE	5
690933	909	3236 MONUMENT AVE	5
690970	909	3214 ARLINGTON ST	5
690971	909	3218 ARLINGTON ST	5
691136	909	3234 ARLINGTON ST	1
691137	909	3234 ARLINGTON ST	3
691152	909	3222 MONUMENT AVE	5
691161	909	3232 ARLINGTON ST	5
691194	909	3221 ARLINGTON ST	1
691195	909	3221 ARLINGTON ST	3
691208	909	3213 MONUMENT AVE	5
691236	909	3218 MONUMENT AVE	5
691372	909	3231 MONUMENT AVE	5
691417	909	1948 N 18TH STREET	6
691496	909	1959 N 31ST STREET	6

Unit ID	Project #	Unit Address	BR
804018	909	1920 N 17TH STREET	2
804019	909	1920 N 17TH STREET	6
804032	909	3012 W BERKS ST	5
804033	909	1904 N 31ST STREET	6
804041	909	2010 DIAMOND ST	3
804042	909	2010 DIAMOND ST	3
804043	909	2010 DIAMOND ST	3
804056	909	1715 W NORRIS ST	3
804057	909	1715 W NORRIS ST	4
804119	909	1721 W NORRIS ST	3
804120	909	1721 W NORRIS ST	4
804126	909	2022 W NORRIS ST	6
804156	909	3155 EUCLID ST	3
804157	909	3155 EUCLID ST	4
804199	909	2833 DIAMOND ST	2
804200	909	2833 DIAMOND ST	6
804231	909	2118 N 16TH STREET	3
804232	909	2118 N 16TH STREET	3
804249	909	2021 N 17TH STREET	3
804250	909	2021 N 17TH STREET	5
804298	909	2012 N 22ND STREET	5
804299	909	2012 N 22ND STREET	5
804300	909	2012 N 22ND STREET	5
804368	909	1946 N 19TH STREET	3
804369	909	1946 N 19TH STREET	5
804377	909	1735 W BERKS ST	3
804378	909	1735 W BERKS ST	4
804421	909	1911 N 19TH STREET	4
804422	909	1911 N 19TH STREET	5
804435	909	1915 N 19TH STREET	2
804436	909	1915 N 19TH STREET	3
804437	909	1915 N 19TH STREET	3
804447	909	1911 N 31ST STREET	3
804448	909	1911 N 31ST STREET	3
804449	909	1913 N 31ST STREET	3
804450	909	1913 N 31ST STREET	3
804605	909	2003 N 18TH STREET	4
804606	909	2003 N 18TH STREET	4
804629	909	1709 W NORRIS ST	5
804630	909	1709 W NORRIS ST	5

Unit ID	Project #	Unit Address	BR
804634	909	1929 DIAMOND ST	3
804635	909	1929 DIAMOND ST	2
804636	909	1929 DIAMOND ST	3
804649	909	1856 N VAN PELT ST	4
804650	909	1856 N VAN PELT ST	4
804690	909	1724 PAGE ST	5
804735	909	2011 N 31ST STREET	2
804736	909	2011 N 31ST STREET	3
804747	909	1946 N 31ST STREET	3
804763	909	2137 N 15TH STREET	2
804764	909	2137 N 15TH STREET	4
818034	909	1867 N JUDSON ST	3
818145	909	1927 N NAPA ST	3
818298	909	2222 DIAMOND ST	6
818349	909	3020 W BERKS ST	5
818358	909	1955 N 23RD STREET	3
818481	909	3024 W BERKS ST	5
818536	909	3127 PAGE ST	5
888563	909	3127 W MONTGOMERY AVE	6
926765	909	1946 N NEWKIRK ST	3
041556	908	2335 N 21ST STREET	6
041601	908	2327 N 21ST STREET	6
041649	908	2250 N 21ST STREET	2
041650	908	2250 N 21ST STREET	5
041804	908	2233 N 17TH STREET	4
041978	908	2349 N 21ST STREET	5
041996	908	2648 N HOLLYWOOD ST	3
042012	908	2347 N 32ND STREET	3
042110	908	2211 N 27TH STREET	2
042111	908	2211 N 27TH STREET	4
042127	908	2406 N MARSTON ST	2
042480	908	2251 N MOLE ST	2
042521	908	2321 N CROSKEY ST	2
042656	908	2320 N 21ST STREET	2
042657	908	2320 N 21ST STREET	4
042673	908	2319 N 16TH STREET	2
042674	908	2319 N 16TH STREET	5
042681	908	2946 W YORK ST	2
042774	908	1913 W DAUPHIN ST	1
042775	908	1913 W DAUPHIN ST	5

Unit ID	Project #	Unit Address	BR
042821	908	2209 N 27TH STREET	2
042822	908	2209 N 27TH STREET	4
042946	908	2339 N 21ST STREET	2
042947	908	2339 N 21ST STREET	4
043066	908	2329 N 16TH STREET	1
043067	908	2329 N 16TH STREET	5
043092	908	2644 N 26TH STREET	4
043298	908	2342 N 20TH STREET	3
043299	908	2342 N 20TH STREET	3
043330	908	1940 W YORK ST	6
043409	908	2646 N 26TH STREET	6
043517	908	2332 N 21ST STREET	3
043518	908	2332 N 21ST STREET	3
043545	908	2350 N 21ST STREET	3
043546	908	2350 N 21ST STREET	3
043598	908	2203 N 19TH STREET	3
043599	908	2203 N 19TH STREET	4
043676	908	2262 N 21ST STREET	3
043677	908	2262 N 21ST STREET	4
043720	908	2552 W OAKDALE ST	3
043721	908	2552 W OAKDALE ST	3
043767	908	2601 W OAKDALE ST	3
043768	908	2601 W OAKDALE ST	5
043833	908	2311 N 20TH STREET	3
043834	908	2311 N 20TH STREET	3
124974	908	2236 N 19TH STREET	5
125102	908	2345 N 22ND STREET	6
125190	908	2549 N GARNET ST	4
125206	908	2353 N 20TH STREET	5
125246	908	2453 N NEWKIRK ST	2
125261	908	2245 N UBER ST	6
125326	908	2239 N 17TH STREET	6
125356	908	2336 N VAN PELT ST	3
125367	908	2454 N NEWKIRK ST	2
125400	908	2436 N NEWKIRK ST	2
125421	908	2219 N 22ND STREET	6
125438	908	2328 N 16TH STREET	6
125442	908	2355 N OPAL ST	2
125454	908	2431 N DOVER ST	2
125472	908	2454 N DOVER ST	2

Unit ID	Project #	Unit Address	BR
125546	908	2244 N 19TH STREET	5
125596	908	2240 N 19TH STREET	5
125653	908	2449 N DOVER ST	2
125676	908	2609 W OAKDALE ST	2
125775	908	2326 N 21ST STREET	6
125859	908	2243 N 21ST STREET	6
125876	908	2459 N NATRONA ST	2
125881	908	2341 N 21ST STREET	6
125907	908	2634 N 29TH STREET	6
255953	908	2446 N DOVER ST	2
255988	908	3033 W OAKDALE ST	2
690121	908	2330 N 21ST STREET	6
690122	908	2328 N 21ST STREET	6
690134	908	2340 N 16TH STREET	6
690177	908	2224 N 17TH STREET	6
690219	908	2252 N 19TH STREET	5
690405	908	2553 N 16TH STREET	6
690973	908	2356 N OPAL ST	3
691149	908	2603 N 29TH STREET	2
691150	908	2603 N 29TH STREET	3
691439	908	2415 N MARSTON ST	2
804067	908	2334 N 20TH STREET	3
804068	908	2334 N 20TH STREET	3
804254	908	2320 N 22ND STREET	3
804255	908	2320 N 22ND STREET	3
804373	908	2336 N 22ND STREET	3
804374	908	2336 N 22ND STREET	3
804375	908	2340 N 22ND STREET	3
804376	908	2340 N 22ND STREET	3
804417	908	2345 N 20TH STREET	4
804534	908	2213 N 22ND STREET	3
804535	908	2213 N 22ND STREET	4
804678	908	2314 N 22ND STREET	2
804679	908	2314 N 22ND STREET	3
804716	908	2218 N 21ST STREET	3
804717	908	2218 N 21ST STREET	4
804753	908	1922 W YORK ST	5
818256	908	2722 W HUNTINGDON ST	3
888705	908	2619 N 17TH STREET	5
926761	908	2523 N NAPA ST	2

Unit ID	Project #	Unit Address	BR
Scattered Sites Not Viable			
041557	909	2940 PAGE ST	3
041691	901	4920 PARRISH ST	4
042033	908	3143 W ARIZONA ST	2
042305	908	2543 N COLORADO ST	2
042356	905	2242 N 04TH STREET	5
042912	907	1523 N 07TH STREET	4
042994	908	2266 N VAN PELT ST	3
043251	910	2437 REDNER ST	4
043940	905	2148 N ORKNEY ST	3
124843	910	2408 REDNER ST	4
125002	908	2230 N 19TH STREET	6
125018	905	2134 N ORKNEY ST	4
125279	905	2128 N 05TH STREET	4
125482	910	2425 NASSAU ST	2
125513	905	2021 N 05TH STREET	5
125531	908	2224 N 19TH STREET	6
125664	904	2712 W STERNER ST	2
125836	908	2216 N 19TH STREET	6
125868	910	2412 NASSAU ST	2
599300	901	207 N 54TH STREET	3
690578	908	2506 N CHADWICK ST	3
690682	901	5104 FUNSTON ST	3
690745	908	2515 N COLORADO ST	3
690804	909	2153 N 21ST STREET	4
690805	909	2153 N 21ST STREET	2
690813	901	4825 PARRISH ST	3
691281	909	2121 N 19TH STREET	2
691282	909	2121 N 19TH STREET	6
691373	901	645 N CREIGHTON ST	3
691422	907	2138 N FRANKLIN ST	5
804114	907	1908 N 08TH STREET	5
804660	909	1512 DIAMOND ST	4
804661	909	1512 DIAMOND ST	4
818098	904	3154 N CARLISLE ST	2
818152	909	2139 N 19TH STREET	6
818204	910	1325 N 23RD STREET	5
818386	909	2114 N 19TH STREET	6
818482	908	2218 N 19TH STREET	6
818523	905	1931 N 04TH STREET	5

Unit ID	Project #	Unit Address	BR
857199	903	1432 S 56TH STREET	3
857327	904	67 E SEYMOUR ST	3
888559	901	5210 HARLAN ST	3
888567	901	5176 VIOLA ST	3
888659	904	1221 W BUTLER ST	4
888725	901	5178 VIOLA ST	4
926716	903	6015 ALLMAN ST	3
976196	901	1650 N 60TH STREET	3
976219	903	1754 S 60TH STREET	4
BALANCE OF RAD TRANSFER OF ASSISTANCE			
041526	905	1929 N 05TH STREET	6
041570	905	1933 N 05TH STREET	4
041571	905	1935 N 05TH STREET	4
041572	905	1937 N 05TH STREET	4
041661	905	2535 N 07TH STREET	4
041772	905	2532 N HOWARD ST	5
041932	905	2108 N 05TH STREET	5
041936	905	2415 N LAWRENCE ST	4
041957	905	421 W DAUPHIN ST	5
042452	905	2208 N 05TH STREET	6
042533	905	2313 N HOWARD ST	5
042697	905	2040 N 05TH STREET	4
042835	905	2024 N BODINE ST	2
042892	905	2406 N LEITHGOW ST	2
042895	905	2416 N LEITHGOW ST	2
043064	905	2119 N 05TH STREET	4
043134	905	2332 N 05TH STREET	4
043135	905	2339 N 05TH STREET	4
043635	905	1929 N 04TH STREET	5
043807	905	2407 N LAWRENCE ST	4
043939	905	2123 N 04TH STREET	4
043957	905	2209 N REESE ST	3
124815	905	2542 N FRANKLIN ST	3
124819	905	1550 N LAWRENCE ST	4
124825	905	409 W SUSQUEHANNA AVE	4
124876	905	2143 N 05TH STREET	3
125007	905	2552 N HOWARD ST	5
125044	905	2226 N ORKNEY ST	4
125123	905	319 W NORRIS ST	4
125139	905	2425 N MARSHALL ST	5

Unit ID	Project #	Unit Address	BR
125152	905	2542 N HOWARD ST	5
125264	905	2138 N ORKNEY ST	2
125275	905	2544 N 09TH STREET	3
125290	905	1754 N 03RD STREET	4
125317	905	2150 N 05TH STREET	5
125470	905	626 W HUNTINGDON ST	5
125489	905	1914 MUTTER ST	2
125527	905	1933 N 04TH STREET	5
125636	905	1826 N 04TH STREET	5
125705	905	921 W HUNTINGDON ST	5
125747	905	2514 N FRANKLIN ST	3
125752	905	645 W CUMBERLAND ST	5
125857	905	639 W CUMBERLAND ST	5
125872	905	2427 N LAWRENCE ST	4
255963	905	2237 N 04TH STREET	5
690159	905	2451 N 05TH STREET	5
690200	905	532 W BERKS ST	4
690208	905	2631 N FRANKLIN ST	3
690211	905	1921 N 05TH STREET	4
690728	905	2642 N 03RD STREET	3
691054	905	2527 N FRANKLIN ST	3
691094	905	2431 N REESE ST	3
691107	905	2537 N 07TH STREET	5
691119	905	2437 N MARSHALL ST	5
691192	905	2522 N 09TH STREET	4
691246	905	416 W NORRIS ST	6
691384	905	2155 N 05TH STREET	5
691425	905	2234 N HANCOCK ST	5
691454	905	2016 N LAWRENCE ST	4
804359	905	616 W CUMBERLAND ST	5
804492	905	2032 N 05TH STREET	3
804729	905	1439 N ORKNEY ST	2
818019	905	2424 N MARSHALL ST	5
818224	905	1842 N 04TH STREET	5
818434	905	955 N 06TH STREET	6
926754	905	2526 N LAWRENCE ST	3
926790	905	2407 N 04TH STREET	5
926791	905	2434 N 04TH STREET	2
041636	906	1739 N GRATZ ST	5
041678	906	726 SHIRLEY ST	4

Unit ID	Project #	Unit Address	BR
041689	906	722 N 16TH STREET	2
041690	906	722 N 16TH STREET	6
041873	906	1705 N GRATZ ST	4
041916	906	1432 N 17TH STREET	2
041917	906	1432 N 17TH STREET	6
041918	906	1616 W FLORA ST	4
042214	906	1929 BROWN ST	5
043023	906	622 N 16TH STREET	4
043024	906	622 N 16TH STREET	4
043406	906	1838 INGERSOLL ST	5
043496	906	1515 N BOUVIER ST	2
043497	906	1515 N BOUVIER ST	5
043557	906	1730 W MASTER ST	3
043558	906	1730 W MASTER ST	3
043559	906	1730 W MASTER ST	3
043595	906	1728 W MASTER ST	3
043596	906	1728 W MASTER ST	3
043597	906	1728 W MASTER ST	3
043787	906	1004 GREEN ST	1
043788	906	1004 GREEN ST	4
043921	906	1010 GREEN ST	2
043922	906	1010 GREEN ST	5
043980	906	1423 N 17TH STREET	3
043981	906	1423 N 17TH STREET	3
043982	906	1423 N 17TH STREET	3
043983	906	1425 N 17TH STREET	3
043984	906	1425 N 17TH STREET	3
043985	906	1425 N 17TH STREET	3
124931	906	1537 N BOUVIER ST	6
124990	906	1734 N SYDENHAM ST	5
124998	906	1512 WILLINGTON ST	6
125017	906	1715 W THOMPSON ST	4
125033	906	1828 W MONTGOMERY AVE	5
125049	906	1919 BROWN ST	5
125155	906	1509 BROWN ST	4
125483	906	1626 N SYDENHAM ST	5
690198	906	725 N 17TH STREET	3
690199	906	725 N 17TH STREET	4
690294	906	1427 N 17TH STREET	3
690295	906	1427 N 17TH STREET	3

Unit ID	Project #	Unit Address	BR
690296	906	1427 N 17TH STREET	3
690306	906	1443 N 17TH STREET	3
690307	906	1443 N 17TH STREET	3
690308	906	1443 N 17TH STREET	3
690317	906	1505 N 17TH STREET	3
690318	906	1505 N 17TH STREET	4
690319	906	1505 N 17TH STREET	2
690433	906	724 SHIRLEY ST	5
690446	906	1726 W MASTER ST	3
690447	906	1726 W MASTER ST	3
690448	906	1726 W MASTER ST	3
690533	906	854 N BAMBREY ST	3
691269	906	1614 BROWN ST	6
691278	906	1724 WYLIE ST	5
804142	906	624 N 12TH STREET	3
804143	906	624 N 12TH STREET	3
804144	906	624 N 12TH STREET	3
804211	906	1605 W OXFORD ST	3
804212	906	1605 W OXFORD ST	3
804213	906	1605 W OXFORD ST	3
804484	906	1513 N BOUVIER ST	1
804485	906	1513 N BOUVIER ST	4
804644	906	1438 N 17TH STREET	4
804645	906	1438 N 17TH STREET	4
804744	906	1821 VINEYARD ST	5
818101	906	1640 FRANCIS ST	6
125570	904	3024 N 05TH STREET	3
125710	904	1010 W INDIANA AVE	5
125740	904	522 W INDIANA AVE	5
125804	904	2856 N OPAL ST	2
125892	904	3047 N CARLISLE ST	3
255944	904	3322 N 05TH STREET	6
818083	904	315 E INDIANA AVE	3
818168	904	4509 N BOUVIER ST	3
818174	904	4512 N BOUVIER ST	3
818238	904	2711 W LEHIGH AVE	5
818249	904	1124 W VENANGO ST	5
818410	904	2801 N MARVINE ST	6
818413	904	3256 N 13TH STREET	6
857155	904	3534 N 11TH STREET	4

Unit ID	Project #	Unit Address	BR
857165	904	4826 N 15TH STREET	3
857237	904	2847 N 08TH STREET	4
857257	904	1516 ROWAN ST	3
857260	904	2758 N 02ND STREET	3
857399	904	227 W WISHART ST	3
857417	904	120 W WISHART ST	3
857525	904	5215 N 10TH STREET	3
857527	904	1725 W ROCKLAND ST	4
888879	904	4210 N HICKS ST	3
888920	904	500 E PENN ST	3
888926	904	822 E LOCUST AVE	4
888931	904	27 W MANHEIM ST	5
916024	904	1211 WINGOHOCKING ST	4
916031	904	3646 N MARVINE ST	4
916033	904	1917 DENNIE ST	5
916034	904	1116 W TIOGA ST	4
916087	904	3109 N TAYLOR ST	3
926746	904	4815 GREENE ST	6
926783	904	1147 W ERIE AVE	6
926796	904	3227 N 15TH STREET	6
976166	904	1135 W VENANGO ST	4
125506	901	648 N YEWDALL ST	2
125693	901	4919 W STILES ST	3
125875	901	228 N CECIL ST	3
609329	901	107 N MILLICK ST	3
609339	901	150 N 58TH STREET	3
609345	901	220 N 56TH STREET	3
609353	901	239 N RUBY ST	3
609364	901	658 N 54TH STREET	3
609429	901	27 N PEACH ST	3
690532	901	4924 OLIVE ST	3
691290	901	4945 FAIRMOUNT AVE	3
888795	901	5306 RACE ST	4
888810	901	5149 WYALUSING AVE	4
888831	901	437 S 62ND STREET	3
888871	901	44 N 58TH STREET	3
888872	901	551 N CREIGHTON ST	3
124967	903	1606 CATHERINE ST	5
125309	903	2021 FITZWATER ST	5
125493	903	1247 S HANSON ST	2

Unit ID	Project #	Unit Address	BR
125637	903	1243 S HANSON ST	2
125736	903	1529 LATONA ST	2
857281	903	5706 SPRINGFIELD AVE	4
857287	903	5417 BELMAR TERRACE	3
857339	903	1925 S REDFIELD ST	3
857363	903	6014 ALLMAN ST	3
857436	903	2114 S FRAZIER ST	4
857453	903	2026 S CECIL ST	3
857469	903	1841 S 55TH STREET	4
857489	903	2123 S SHIELDS ST	3
857530	903	5722 PENTRIDGE ST	3
857532	903	2124 S SHIELDS ST	3
857554	903	5722 WINDSOR AVE	3
857561	903	5855 WARRINGTON AVE	3
888710	903	2415 CHRISTIAN ST	5
888734	903	1521 S PATTON ST	3
888817	903	1613 S CONESTOGA ST	3
888855	903	5419 BELMAR TERRACE	3
888897	903	5733 BEAUMONT ST	3
916072	903	5616 ELLIOT ST	3
916089	903	1434 S VODGES ST	3
926719	903	1522 S LINDENWOOD ST	3
041860	907	933 W York St	5
042235	907	2311 N 10TH STREET	1
042236	907	2311 N 10TH STREET	4
042242	907	1218 W SERGEANT ST	3
042383	907	1543 N 09TH STREET	5
042431	907	2006 N 08TH STREET	6
042971	907	1232 W YORK ST	3
043418	907	2512 N ALDER ST	2
043420	907	2514 N ALDER ST	2
043421	907	2516 N ALDER ST	2
043962	907	2552 N SARTAIN ST	3
043963	907	2642 N SARTAIN ST	2
124862	907	809 DIAMOND ST	6
124984	907	2535 N 11TH STREET	5
125095	907	619 WESTMONT ST	2
125174	907	2234 N CAMAC ST	6
125334	907	2436 N DELHI ST	2
125647	907	2100 N 08TH STREET	6

Unit ID	Project #	Unit Address	BR
125741	907	1222 W HAZZARD ST	3
125828	907	2512 N 10TH STREET	5
135065	907	1510 N 6TH ST	3
135110	907	2323 N 13TH ST	2
690138	907	1937 N MARSHALL ST	5
690139	907	1939 N MARSHALL ST	5
690213	907	2140 N 09TH STREET	5
690334	907	2157 N 09TH STREET	5
691293	907	2025 N 09TH STREET	4
804123	907	1410 N 07TH STREET	4
804242	907	2114 N 09TH STREET	5
804352	907	1931 N 09TH STREET	4
804500	907	1652 N 06TH STREET	2
818118	907	2144 N 08TH STREET	5
818157	907	2218 N 07TH STREET	5
818169	907	2112 N 07TH STREET	5
818318	907	2214 N 09TH STREET	5
818399	907	2024 N 08TH STREET	5
041566	902	3854 OLIVE ST	3
041580	902	3929 FOLSOM ST	3
041635	902	889 N 47TH STREET	3
041698	902	3926 RENO ST	3
041770	902	4509 LAIRD ST	3
041839	902	3606 MELON ST	6
041910	902	3702 BRANDYWINE ST	2
041912	902	3706 BRANDYWINE ST	2
041960	902	3932 WALLACE ST	3
041985	902	3818 HAVERFORD AVE	3
042086	902	3800 MELON ST	2
042269	902	614 N 38TH STREET	5
042312	902	4167 MANTUA AVE	5
042394	902	619 N 39TH STREET	5
042445	902	3944 FOLSOM ST	5
042682	902	3821 BRANDYWINE ST	3
042694	902	4077 WALLACE ST	2
042753	902	3841 BRANDYWINE ST	3
042979	902	724 N DEKALB ST	3
043116	902	823 N 40TH STREET	2
043117	902	823 N 40TH STREET	4
043490	902	768 N 38TH STREET	5

Unit ID	Project #	Unit Address	BR
043570	902	775 N 38TH STREET	1
043571	902	775 N 38TH STREET	4
124861	902	3866 OLIVE ST	3
124908	902	3843 HAVERFORD AVE	6
125272	902	3850 BROWN ST	5
125398	902	3853 ASPEN ST	3
125469	902	4203 OGDEN ST	3
125503	902	3917 WYALUSING AVE	2
125557	902	3419 FAIRMOUNT AVE	2
125572	902	3913 FOLSOM ST	3
125599	902	3935 FAIRMOUNT AVE	5
125780	902	644 N 38TH STREET	3
125785	902	923 N 42ND STREET	5
125789	902	763 N 37TH STREET	2
125795	902	3608 WALLACE ST	5
125851	902	612 N 39TH STREET	6
125871	902	3932 BROWN ST	6
125889	902	853 N 45TH STREET	3
125902	902	746 N 38TH STREET	3
690276	902	3849 FAIRMOUNT AVE	3
690277	902	3849 FAIRMOUNT AVE	2
690542	902	3921 FOLSOM ST	3
690549	902	732 N 37TH STREET	3
690605	902	3915 RENO ST	3
690648	902	3808 RENO ST	3
690649	902	3824 RENO ST	3
690702	902	3812 RENO ST	3
690720	902	866 N 47TH STREET	3
691017	902	3930 FOLSOM ST	5
691063	902	3920 FOLSOM ST	4
691067	902	3711 MT VERNON ST	3
691074	902	632 N LOWBER ST	3
691106	902	3825 BROWN ST	4
691186	902	806 N 38TH STREET	5
691187	902	3822 MT VERNON ST	3
691215	902	3521 MT VERNON ST	3
691218	902	3527 MT VERNON ST	3
691255	902	3504 MT VERNON ST	3
691331	902	3520 MT VERNON ST	4
691335	902	3510 MT VERNON ST	2

Unit ID	Project #	Unit Address	BR
691378	902	744 N 38TH STREET	3
691383	902	741 N DEKALB ST	3
691393	902	3916 FOLSOM ST	5
691445	902	881 N 47TH STREET	3
804048	902	4511 LAIRD ST	3
804078	902	3841 OLIVE ST	3
804109	902	610 UNION ST	5
804131	902	3428 WALLACE ST	5
804183	902	614 UNION ST	5
818055	902	766 N DEKALB ST	3
818124	902	926 N 43RD STREET	3
818186	902	628 N 37TH STREET	5
818288	902	4169 MANTUA AVE	5
818302	902	4223 W STILES ST	5
818391	902	3828 ASPEN ST	3
818438	902	656 N 36TH STREET	6
818470	902	3924 BROWN ST	6
818520	902	3122 HAVERFORD AVE	6
818532	902	3826 WALLACE ST	3
818544	902	4213 LEIDY AVE	5
857333	902	1023 PALLAS ST	3
876525	902	4707 PARRISH ST	3
876527	902	4711 PARRISH ST	3
888646	902	4112 BROWN ST	3
888658	902	4240 W STILES ST	5
888670	902	729 N 39TH STREET	4
888703	902	4173 MANTUA AVE	5
888763	902	4126 OGDEN ST	2
926799	902	4245 OGDEN ST	3
041531	910	2126 W MASTER ST	5
041682	910	2435 CLIFFORD ST	6
041744	910	2703 W JEFFERSON ST	5
041844	910	1410 N ETING ST	2
042995	910	2324 SHARSWOOD ST	5
043073	910	2403 W OXFORD ST	6
043252	910	1521 N 25TH STREET	6
043358	910	1222 N TAYLOR ST	3
043827	910	2440 NICHOLAS ST	5
043913	910	1535 N 22ND STREET	5
124892	910	2319 SHARSWOOD ST	4

Unit ID	Project #	Unit Address	BR
124949	910	1730 N MARSTON ST	3
124963	910	1744 N 27TH STREET	4
125110	910	1731 N TANEY ST	3
125113	910	2403 CECIL B MOORE AVE	3
125114	910	2403 CECIL B MOORE AVE	4
125407	910	2424 W OXFORD ST	5
125700	910	2403 INGERSOLL ST	2
125867	910	1230 N DOVER ST	3
125934	910	2238 INGERSOLL ST	4
690001	910	1314 N HOLLYWOOD ST	3
690022	910	1740 N 28TH STREET	4
690024	910	1317 N 23RD STREET	6
690052	910	1427 N HOLLYWOOD ST	3
690114	910	1521 N NEWKIRK ST	3
690551	910	1454 N HOLLYWOOD ST	3
690633	910	2931 CECIL B MOORE AVE	6
690737	910	2402 W THOMPSON ST	5
690808	910	2441 W OXFORD ST	2
690809	910	2441 W OXFORD ST	4
691090	910	1738 N NEWKIRK ST	3
804395	910	2414 W MASTER ST	5
804571	910	2410 CECIL B MOORE AVE	5
804684	910	2828 W MASTER ST	4
804685	910	2828 W MASTER ST	4
818137	910	1525 N 25TH STREET	6
818226	910	2042 W MASTER ST	5
818255	910	2403 REDNER ST	4
818368	910	2415 TURNER ST	5
818369	910	2707 W JEFFERSON ST	3
888580	910	1402 N 27TH STREET	4
888633	910	2040 W MASTER ST	6
888636	910	2927 W MASTER ST	4
041529	909	1940 N TAYLOR ST	2
041715	909	2017 N BAMBREY ST	3
041721	909	1835 N VAN PELT ST	6
041802	909	2115 N NEWKIRK ST	2
041816	909	2933 WESTMONT ST	2
041907	909	2841 DIAMOND ST	2
041908	909	2841 DIAMOND ST	6
041998	909	2956 WESTMONT ST	3

Unit ID	Project #	Unit Address	BR
042030	909	2104 N 16TH STREET	3
042031	909	2104 N 16TH STREET	3
042032	909	2104 N 16TH STREET	1
042062	909	2936 WESTMONT ST	2
042275	909	1731 W MONTGOMERY AVE	3
042276	909	1731 W MONTGOMERY AVE	4
042277	909	1731 W MONTGOMERY AVE	1
042310	909	2129 N 22ND STREET	2
042311	909	2129 N 22ND STREET	5
042795	909	1917 N 24TH STREET	5
042810	909	2117 N 15TH STREET	3
042811	909	2117 N 15TH STREET	3
042812	909	2117 N 15TH STREET	3
042882	909	2124 N 21ST STREET	2
042883	909	2124 N 21ST STREET	4
043159	909	2122 N 16TH STREET	3
043160	909	2122 N 16TH STREET	3
043161	909	2122 N 16TH STREET	3
043244	909	2153 N 15TH STREET	3
043245	909	2153 N 15TH STREET	3
043246	909	2153 N 15TH STREET	3
043472	909	2020 N BAMBREY ST	3
043473	909	2020 N BAMBREY ST	3
043511	909	1803 N 18TH STREET	3
043512	909	1803 N 18TH STREET	3
043513	909	1803 N 18TH STREET	3
043578	909	1812 N 24TH STREET	5
043626	909	2018 N 32ND STREET	2
043627	909	2018 N 32ND STREET	6
043828	909	3114 FRENCH ST	3
043945	909	2032 N 18TH STREET	6
124952	909	1717 ARLINGTON ST	6
125134	909	3228 ARLINGTON ST	6
125138	909	1847 N JUDSON ST	3
125222	909	2415 ARLINGTON ST	3
125235	909	1931 N RINGGOLD ST	3
125339	909	1914 N 24TH STREET	6
125351	909	2140 N CARLISLE ST	6
125575	909	2117 N 18TH STREET	6
125632	909	1632 EDGLEY ST	3

Unit ID	Project #	Unit Address	BR
125798	909	3114 WESTMONT ST	3
125826	909	2719 W MONTGOMERY AVE	3
690004	909	1809 N 28TH STREET	3
690009	909	2228 PAGE ST	3
690013	909	1812 N 27TH STREET	5
690070	909	1816 N NEWKIRK ST	3
690072	909	1811 N 28TH STREET	3
690152	909	1860 N BUCKNELL ST	3
690515	909	1824 N BUCKNELL ST	3
690516	909	1802 N BUCKNELL ST	3
690517	909	1804 N BUCKNELL ST	3
690524	909	1825 N BUCKNELL ST	3
690525	909	1847 N BUCKNELL ST	3
690526	909	1821 N BUCKNELL ST	3
690541	909	1843 N BUCKNELL ST	3
690557	909	1825 N 26TH STREET	3
690595	909	1833 N TANEY ST	3
690851	909	2151 N NATRONA ST	3
691021	909	1838 N BUCKNELL ST	3
804208	909	1843 N 17TH STREET	3
804209	909	1843 N 17TH STREET	3
804210	909	1843 N 17TH STREET	3
804330	909	1738 MONUMENT AVE	3
804331	909	1738 MONUMENT AVE	3
804404	909	1908 N 24TH STREET	3
804405	909	1908 N 24TH STREET	2
818011	909	2135 N NATRONA ST	3
818033	909	1844 N JUDSON ST	3
818129	909	1921 N 24TH STREET	5
818279	909	1860 N TANEY ST	3
818338	909	1820 N 22ND STREET	6
818362	909	1816 N RINGGOLD ST	5
818404	909	3218 W SUSQUEHANNA AVE	6
818416	909	3110 EUCLID ST	6
818418	909	1806 N TANEY ST	3
818463	909	3113 W NORRIS ST	3
818471	909	3106 W BERKS ST	3
818472	909	1826 N BUCKNELL ST	3
818494	909	1727 FONTAIN ST	4
818530	909	1923 N 24TH STREET	5

Unit ID	Project #	Unit Address	BR
888566	909	2609 W MONTGOMERY AVE	5
888623	909	3124 WESTMONT ST	3
888626	909	1837 N TANEY ST	3
888679	909	1830 N TANEY ST	3
041565	908	2070 W GLENWOOD AVE	4
041637	908	3023 W SUSQUEHANNA AVE	5
041706	908	2344 N OPAL ST	3
041833	908	2205 W SERGEANT ST	2
041920	908	1426 W YORK ST	6
041977	908	1921 W DAUPHIN ST	5
042013	908	3311 W HUNTINGDON ST	4
042122	908	2248 N 17TH STREET	2
042123	908	2248 N 17TH STREET	4
042363	908	2129 W DAUPHIN ST	5
042444	908	2644 N 29TH STREET	6
042578	908	2309 N CROSKEY ST	3
042619	908	1401 W YORK ST	5
042825	908	2230 N 17TH STREET	2
042826	908	2230 N 17TH STREET	5
042956	908	2220 N 17TH STREET	2
042957	908	2220 N 17TH STREET	5
124982	908	2317 W SERGEANT ST	3
125056	908	2343 N 20TH STREET	6
125151	908	2345 N VAN PELT ST	3
125163	908	2450 N DOUGLAS ST	3
125178	908	2415 W HAROLD ST	3
125416	908	2539 N NATRONA ST	3
125429	908	2460 N DOVER ST	2
125577	908	3147 W ARIZONA ST	2
125592	908	2247 N 17TH STREET	6
125654	908	2539 W HAROLD ST	3
125698	908	1625 W HUNTINGDON ST	5
125838	908	2209 N 16TH STREET	6
125873	908	2315 N VAN PELT ST	3
255945	908	2406 N 15TH STREET	5
255971	908	2258 N 17TH STREET	6
690007	908	2524 N 16TH STREET	4
690096	908	2211 N BOUVIER ST	3
690106	908	2334 N OPAL ST	3
690109	908	2246 N BANCROFT ST	3

Unit ID	Project #	Unit Address	BR
690110	908	2356 N VAN PELT ST	3
690118	908	2319 N CLEVELAND ST	3
690135	908	2444 N GARNET ST	3
690412	908	2269 N COLORADO ST	3
690558	908	2342 N 18TH STREET	4
690565	908	2209 N COLORADO ST	3
690573	908	2531 N BOUVIER ST	3
690593	908	2645 N COLORADO ST	3
690722	908	2452 N NATRONA ST	3
690777	908	2525 N COLORADO ST	3
690899	908	2355 N VAN PELT ST	3
690904	908	2513 N COLORADO ST	3
690957	908	2046 W GLENWOOD AVE	4
690986	908	2444 N COLORADO ST	3
691027	908	2327 N COLORADO ST	3
691040	908	2560 N SYDENHAM ST	3
691072	908	2425 N MARSTON ST	2
691135	908	2619 N CORLIES ST	3
691163	908	2469 N COLORADO ST	3
691296	908	2511 N NAPA ST	3
691370	908	2402 W OAKDALE ST	3
804769	908	2260 N 17TH STREET	6
818004	908	2323 N COLORADO ST	3
818111	908	2357 N COLORADO ST	3
818126	908	2614 N 16TH STREET	5
818151	908	2528 N NATRONA ST	3
818230	908	2455 N BOUVIER ST	3
818275	908	2204 N 18TH STREET	6
818314	908	2605 N STANLEY ST	3
818342	908	2232 N 17TH STREET	6
818411	908	2513 N MARSTON ST	3
818526	908	2225 N BANCROFT ST	3
857240	908	2324 N COLORADO ST	3
888572	908	2627 N 18TH STREET	3
926739	908	2226 N BOUVIER ST	3
926742	908	2320 N CLEVELAND ST	3
926743	908	2347 N CLEVELAND ST	3
926767	908	2403 W OAKDALE ST	4

Appendix G: MTW TDC/HCC

PHA's current HUD-approved MTW TDC and HCC cost limits are shown below. PHA last updated the MTW TDC/HCC limits in 2009. Subject to HUD approval, PHA will periodically review and update the MTW TDC/HCC cost limits. In FY 2017 PHA commissioned an independent engineering study to assess local costs and determine updated MTW TDC/HCC cost limits. Upon completion of the engineering study, PHA will submit revised cost limits to HUD for approval.

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

Appendix H: Impact Analyses: Rent Simplification

Pursuant to the Moving To Work (MTW) Agreement, the Philadelphia Housing Authority (PHA) conducted an income and rent analysis of MTW households. Unit Based households, Low Income Housing Tax Credit sites managed by PAPMC, Moderate Rehab units and non-MTW vouchers are not subject to rent simplification and are not included in this analysis. PHA may convert households in the Unit Based program to rent simplification in FY 2018

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

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

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

Affordability

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

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

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

	Housing Choice Voucher Households	Public Housing Households
Households reporting income of \$2,100 or less	922 (6%)	667 (7%)
Households with Gross Rents exceeding Payment Standards	3,327 (22%)	-N/A-
Households on Ceiling Rent	-N/A-	518 (6%)

Household Income

Of the 15,076 MTW HCV households included in the analysis, 4% (582) report zero income. 10,254 (68%) MTW HCV households do not have any employment income, while 4,822 (32%) MTW HCV households have at least one wage earner. Of the 9,308 PH households included in the analysis, 4% (410) report zero income. 6,792 (73%) PH households do not have any employment income, while 2,516 (27%) PH households have at least one wage earner. Table 2 shows total household income and table 3 shows employment income for wage earning households.

Table 2: Household Income

	Housing Choice Voucher Households	Public Housing Households
Average	\$13,666	\$14,090
25 th Percentile	\$8,821	\$8,622
Median	\$10,104	\$9,307
75 th Percentile	\$18,122	\$17,056
Max	\$101,678	\$166,140

Table 3: Employment Income for Households with Wage Earner(s)

	Housing Choice Voucher Households	Public Housing Households
Average	\$18,473	\$21,108
25 th Percentile	\$10,382	\$10,176
Median	\$16,688	\$17,139
75 th Percentile	\$24,960	\$27,766
Max	\$101,678	\$159,453

CRP

Under MTW, HCV Tenant-Based households who are responsible for paying gas heat and who are income eligible to participate in the PGW Customer Responsibility Program (CRP) have the gas portion of their utility allowances calculated using PHA's CRP MTW utility policy. Participation in the PGW CRP program places a cap on the amount of money that eligible tenants will be required to pay for their gas utility payments based on household income, not consumption. Gas utility allowances are calculated using the PGW CRP calculation method. Table 4 illustrates the savings incurred by PHA's adoption of this policy.

Table 4: Utility Allowance Savings due to CRP MTW UA Policy

	Households on CRP
Total gas portion without application of CRP	\$746,518
Total gas portion with application of CRP	\$418,258
Monthly Savings	\$328,260
Annual Savings	\$3,939,120

Appendix I: Board Resolution & MTW Certification

RESOLUTION NO. 11904

RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY TO SUBMIT ITS MOVING TO WORK ANNUAL PLAN ("PLAN") FOR FISCAL YEAR 2018, INCLUDING RENTAL ASSISTANCE DEMONSTRATION PROGRAM SIGNIFICANT AMENDMENTS, TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT ("HUD") AND TO UNDERTAKE ALL ACTIONS TO OBTAIN HUD APPROVAL AND IMPLEMENT THE PLAN

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") administers a Moving to Work ("MTW") Demonstration Program that is designed to provide the opportunity for selected Housing Authorities to explore and demonstrate more efficient ways to provide and administer low-income housing; and

WHEREAS, pursuant to the Philadelphia Housing Authority ("PHA") Board of Commissioners Resolution No. 10618, dated December 21, 2000, PHA submitted to HUD an MTW Application Plan and Agreement; and

WHEREAS, since 2001, when HUD accepted PHA's application for participation in the MTW Demonstration Program and HUD and PHA executed a MTW Demonstration Agreement ("MTW Agreement"), PHA has continuously participated in the MTW Demonstration Program, as detailed in Resolution 11577, adopted by the Board on January 11, 2013; and

WHEREAS, as a participant in the MTW Demonstration Program, PHA is required to develop an MTW Annual Plan for each fiscal year during the term of the MTW Agreement, which outlines the PHA budget and MTW activities, and to submit the Annual Plan for approval by its Board at least seventy-five (75) days prior to the beginning of each fiscal year; and

WHEREAS, PHA has developed and distributed to the Board the MTW Annual Plan for Fiscal Year 2018 ("Plan"), beginning on April 1, 2017, a summary of which is attached hereto as Attachment "A," which includes the Rental Assistance Demonstration Program Significant Amendments for Westpark Plaza and Blumberg Senior Tower, and a consolidated budget in accordance with the current MTW Agreement, as PHA is a block grant agency; and

WHEREAS, PHA has fulfilled the HUD requirement of providing opportunities for resident and public participation and comment on the Plan, including scheduling at least one (1) public hearing and taking into consideration any comments received, by: 1) holding an introductory meeting with resident leadership and interested PHA residents on November 15, 2016; 2) holding a Public Hearing on November 17, 2016; 3) posting the draft Plan on PHA's website; 4) making copies of the draft Plan available at PHA site offices; and 5) accepting and considering public comments over a period extending from November 4, 2016 to December 5, 2016;

BE IT RESOLVED that the Board of Commissioners hereby approves the MTW Annual Plan for Fiscal Year 2018, including the Rental Assistance Demonstration Significant Amendments incorporated therein, in substantially the form distributed to the Board, and authorizes PHA's Chair and/or President & CEO or their authorized designee(s) to: 1) submit to HUD the PHA MTW Annual Plan for Fiscal Year 2018; 2) take all steps necessary to finalize and secure HUD approval and implement initiatives as described in the Plan, subject to receipt of adequate funding from HUD; 3) certify that the Public Hearing requirement has been met; and 4) execute the HUD Certifications of Compliance with MTW Plan Requirements and Related Regulations, in substantially the form attached hereto as Attachment "B."

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, 2017, 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.

Philadelphia Housing Authority
PHA Name

PA002
PHA Number/HA Code

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

Lynette Brown-Sow
Name of Authorized Official

Chair of the Board of Commissioners
Title


Signature

12-15-16
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: Philadelphia Housing AuthorityProject Name: PHA - Moving to Work Annual Plan FY 2018Location of the Project: The development and implementation of affordable housing and
economic development initiatives in Phila., in accord with the City's
ConPlan and AFH. (2017 Consolidated Plan, adopted June, 2016)Name of the Federal
Program to which the
applicant is applying: HUD - Moving to Work DemonstrationName of
Certifying Jurisdiction: City of Philadelphia, Office of Housing & Community DevelopmentCertifying Official
of the Jurisdiction
Name: Frederick S. Pumell, Sr.Title: Deputy Director, Division of Housing and Community DevelopmentSignature: Date: 12/19/2016

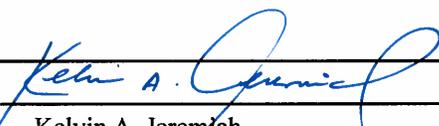
DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 4c 2nd	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency: U.S. Department of Housing and Urban Development	7. Federal Program Name/Description: Moving to Work Annual Plan FY 2018 CFDA Number, if applicable: 14.870	
8. Federal Action Number, if known:	9. Award Amount, if known: \$	
10. a. Name and Address of Lobbying Registrant <i>(if individual, last name, first name, MI):</i> Not applicable	b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature:  Print Name: Kelvin A. Jeremiah Title: President & CEO Telephone No.: 215-684-4174 Date: 12/20/16	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.

(b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).
11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Philadelphia Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Annual Plan FY 2018

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. **Sites for Work Performance.** The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

12 South 23rd Street, Philadelphia PA 19103 and all PHA sites

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

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

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

Name of Authorized Official

Title

Kelvin A. Jeremiah

President & CEO

Signature

Date

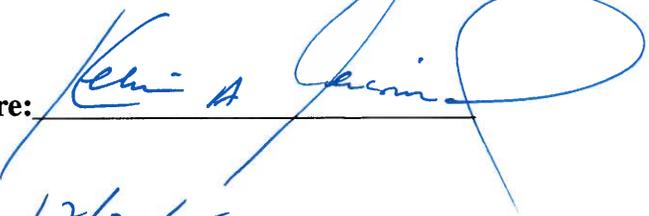
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12/20/16

**ADDENDA
TO
CERTIFICATION OF PAYMENTS TO INFLUENCE FEDERAL TRANSACTIONS**

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

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

Signature: 

Date: 12/20/16

Certification of Payments to Influence Federal Transactions

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

Applicant Name

Philadelphia Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Annual Plan FY 2018

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

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

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

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

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

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

Name of Authorized Official

Kelvin A. Jeremiah

Title

President & CEO

Signature

Date (mm/dd/yyyy)

12/20/16

Appendix J: RAD Significant Amendment (April 2017)

RESOLUTION NO. 11923

**RESOLUTION AUTHORIZING AN AMENDMENT TO THE PHILADELPHIA HOUSING
AUTHORITY MOVING TO WORK ANNUAL PLAN FOR FISCAL YEAR 2018**

WHEREAS, the Philadelphia Housing Authority ("PHA") is a participant in the Moving to Work ("MTW") Demonstration Program pursuant to an agreement with the U.S. Department of Housing and Urban Development ("HUD"); and

WHEREAS, under the terms of its participation in the MTW program, PHA must submit an MTW Annual Plan ("MTW Plan") for HUD approval each fiscal year that describes proposed MTW plans and activities and the PHA Board of Commissioners approved the MTW Plan for Fiscal Year 2018 on December 16, 2016, which was subsequently submitted to and is pending HUD approval; and

WHEREAS, HUD administers the Rental Assistance Demonstration ("RAD") program, under which public housing units can be converted to long-term project based assistance, and, with PHA Board approval, PHA has previously applied to HUD for the conversion under RAD of certain PHA public housing units, including certain long-term vacant and distressed scattered site public housing units, which applications have been subsequently approved by HUD; and

WHEREAS, HUD regulations require submission of an Amendment to the MTW Plan for all RAD conversions, which Amendment must be approved by the Board of Commissioners; and

WHEREAS, PHA has identified two hundred nineteen (219) long-term vacant and distressed scattered site public housing units to convert under the RAD "transfer of assistance" provisions to five (5) newly constructed or substantially rehabilitated developments, which include Cantrell Place, Witherspoon, The Beury Building, Reynolds School and 1315 North 8th Street as described in the Plan Amendment; and

WHEREAS, PHA has fulfilled the HUD requirement of providing opportunities for resident and public participation and comment on the MTW Plan Amendment, including scheduling at least one (1) public hearing, by: 1) making available copies of the MTW Plan Amendment to the public and to residents as of January 27, 2017; 2) holding a public hearing on February 15, 2017; 3) posting the MTW Plan Amendment on PHA's website; 4) briefing Resident Leadership at the February 2017 Resident Roundtable meeting; 5) conducting a public comment period from January 27 through February 27, 2017; and 6) taking into consideration any comments received during the public comment period and public hearing;

BE IT RESOLVED, that the Board of Commissioners does hereby approve the Amendment to the MTW Plan for Fiscal Year 2018, Amendment #1, as distributed to the Board of Commissioners and referenced herein, and authorizes PHA's Chair and/or its President & CEO or his or her authorized designee(s) to take all steps necessary to finalize and secure HUD approval of and to implement the Amendment, as set forth above.

Philadelphia Housing Authority
Fiscal Year 2018 Moving to Work Annual Plan
Rental Assistance Demonstration Significant Amendment

The Philadelphia Housing Authority (PHA) is issuing an amendment to its Fiscal Year 2018 Moving to Work (MTW) Annual Plan as required by the US Department of Housing and Urban Development (HUD) to provide information on PHA's planned activities under the Rental Assistance Demonstration (RAD) program. The amendment will be incorporated in its entirety into PHA's most recent HUD-approved MTW Annual Plan - either the FY 2017 Annual MTW Plan, which has already been approved, or the FY 2018 MTW Annual Plan, which is pending HUD approval. Pursuant to this amendment, PHA will convert 219 long-term vacant and distressed public housing units located at various scattered site locations in Philadelphia to project-based assistance at five (5) new construction or substantial rehab housing developments as described herein. The conversion will be done utilizing the "transfer of assistance" provisions of RAD.

Background

In December 2013, the PHA Board of Commissioners authorized the submission of several applications to HUD under the RAD program. The Board's approval came after a series of public meetings were held to inform existing residents about the RAD program and their rights under a proposed RAD conversion.

In March 2015, HUD issued RAD award letters to PHA that approved the applications for RAD conversion for multiple housing developments, subject to PHA meeting all of the conditions and requirements of the RAD program. The award letters serve as HUD's Commitment to Enter into a Housing Assistance Payments Contract (CHAP) for the subject public housing developments. PHA intends to proceed with RAD conversion and transfer of assistance for certain scattered site public housing units pursuant to the guidelines of PIH Notice 2012-32, REV-3 dated January 12, 2017 and PIH Notice 2016-17 dated November 10, 2016 ("HUD RAD Notices") and any other successor Notices issued by HUD.

One of the conditions of the CHAP is that PHA submit a Significant Amendment to the MTW Annual Plan that incorporates required information on PHA's RAD conversion plans. This document provides the required information and serves as PHA's RAD Significant Amendment for the subject units. PHA intends to propose further Significant Amendment(s) for additional HUD-approved RAD conversions at future dates. PHA provided a thirty-day comment period from January 27 through February 27, 2017, and conducted a Public Hearing on February 15, 2017 to allow residents and the general public an opportunity to review and comment on the RAD Significant Amendment. PHA also reviewed the Amendment with resident leaders at a Resident Roundtable meeting conducted in February 2017. The PHA Board of Commissioners will conduct a vote on the RAD Significant Amendment at a public meeting in March 2017.

RAD Conversion Plan

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

- A total of 219 long-term vacant and distressed public housing units at various scattered site locations owned by PHA. The public housing assistance for these units will be converted and transferred to Project Based Voucher (PBV) assistance at five (5) new construction or substantial rehab developments to be owned by third party developers.

Attachment 1 includes current information on each development or Asset Management Project (AMP) proposed for RAD conversion. Attachment 1 includes the following information:

<i>Current Units:</i>	Total number of units, bedroom size distribution and unit type.
<i>Post-Conversion Units:</i>	If applicable, any changes proposed to the current number of units, the bedroom size distribution or the unit type including de minimis reductions. No unit reductions are proposed under this Significant Amendment.
<i>Transfer of Assistance:</i>	Whether PHA intends to transfer assistance to another development as part of the RAD conversion and, if so, the location, number of units, bedroom size distribution, and unit type where known. Under this Amendment, all assistance will be transferred to new construction or substantial rehab developments.
<i>PBV or PBRA:</i>	Whether PHA intends to convert the development to the Project Based Voucher (PBV) program or to the Project Based Rental Assistance (PBRA) program, along with information on resident rights, resident participation, waiting list and grievance procedures applicable to each program. PHA intends to convert assistance to the PBV program.
<i>Capital Fund Impact:</i>	The current amount of Capital Fund dollars received prior to RAD conversion. Developments converted through the RAD program are not eligible for Public Housing Capital Funds after conversion.
<i>Transfer of Waiting List:</i>	How existing waiting lists will be addressed as part of the conversion.

Conversion to Project Based Vouchers or Project Based Rental Assistance

Public housing developments that are converted to project-based assistance will no longer be subject to HUD rules and regulations pertaining to the public housing program. Upon conversion to RAD, the former public housing units will be subject to the rules and regulations pertaining to either the PBV or PBRA programs, depending on which program option is selected by PHA. HUD has modified the PBV and PBRA program rules and regulations to incorporate additional provisions that apply solely to units converted under RAD. These additional provisions provide important protections to current residents of public housing that are impacted by a RAD conversion.

PHA intends to convert the RAD units listed in Attachment 1 to the PBV program. As part of the conversion initiative, PHA will adopt all required RAD PBV rules except where MTW or other waivers are approved by HUD, and will modify its existing Housing Choice Voucher Program Administrative Plan as needed to incorporate those rules related to resident rights, resident participation, waiting list, lease, waiting list, grievance processes and other areas.

Attachment 2 provides information on the RAD PBV program as required by the HUD RAD Notices related to resident rights and participation, waiting list and grievance procedures.

Capital Fund Budget

Conversion of existing public housing developments under the RAD program will enable PHA to leverage existing funds to secure additional private and other funding. This new funding will be used to undertake long-deferred capital improvements and, in instances where transfer of assistance is involved, to construct or rehabilitate new or existing affordable housing units.

PHA currently receives HUD Capital Funds on an annual basis, subject to Congressional appropriations for the majority of its public housing units. Attachment 1 includes the most recent Capital Fund allocation for each RAD conversion site. Upon conversion to RAD, PHA will no longer receive a Capital Fund allocation for units that have been converted and the annual Capital Fund grant will be decreased.

The total estimated reduction in PHA Capital Funds on an annual basis for the subject units covered under this Significant Amendment is approximately \$664,316 based on FY2016 funding levels. Over a five year period, the estimated Capital Fund reduction is approximately \$3,321,580 based on FY2016 funding levels. The actual amount of reduction may vary depending on Congressional appropriations. As RAD conversions are completed, PHA will modify its existing capital plans to reflect the reduction in funding and change in work scopes.

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

Site and Neighborhood Standards

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

Relocation Plan

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

Compliance

PHA is not presently subject to a voluntary compliance agreement, consent order, consent decree, final judicial ruling or administrative ruling that has any relation to or impact on the planned RAD conversion.

Moving To Work

PHA may utilize MTW Block Grant fungibility and programmatic flexibility to support the RAD conversion effort subject to any necessary Board and HUD approvals. PHA certifies that regardless of any funding changes that may occur as a result of conversion under RAD, PHA will continue to administer and maintain service levels for its remaining portfolio of public housing units. PHA will do this by utilizing available funding including Public Housing Operating Fund, Capital Fund, and Tenant Rental Income.

Significant Amendment Definition

As part of the RAD conversion initiative, a Significant Amendment to the MTW Plan will not be required for the following RAD-specific actions:

- Changes to the Capital Fund budget produced as a result of each approved RAD conversion regardless of whether the proposed conversion will include use of additional Capital Funds;
- Decisions to apply MTW funding or programmatic flexibility to post-conversion RAD developments;
- Decisions or changes related to the ownership and/or financing structures for each approved RAD conversion including decisions to allocate PHA financial resources as a source of funds to support the RAD conversion initiatives;
- Changes to the construction and rehabilitation plans and schedules for each approved RAD conversion;
- Changes to the project names or sponsor entity names;
- Changes in the post-conversion bedroom size distribution and/or the number of de minimis unit reductions up to the 5% permitted under RAD program rules;
- Changes to the pre-conversion bedroom size distribution and/or the project or AMP from which transfer of assistance units will be converted; and,
- Decisions to convert to either Project Based Vouchers or Project Based Rental Assistance.

Philadelphia Housing Authority
Moving to Work Annual Plan Amendment
Rental Assistance Demonstration Significant Amendment
Attachment 1 – Information on Public Housing Developments to be Converted

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

RAD Significant Amendment Attachment 1

Development Name Scattered Sites
PIC Development ID # PA002000904, PA002000906
Conversion Type (PBV or PBRA) PBV
Capital Fund Grant (FY16) \$122,224.04

Pre-Conversion Total Units 40
Pre-Conversion Unit Type PBV
Pre-Conversion Bedroom Size AMP PA002000904 AMP PA002000906

	# of Units		# of Units
0 BR	0		0
1 BR	0		0
2 BR	1		1
3 BR	5		6
4 BR	6		5
5 BR	5		7
6 BR	0		4

Post-Conversion Total Units 61
Post-Conversion RAD Units 40
Post-Conversion Unit Type PBV
Post- Conversion Development Name and Address Cantrell Place
 427-55, 438-48, 502-26, 523-31 Cantrell St; 2116 S 5th Street; 519-21 Winton Street, Philadelphia, PA 19148.

Post - Conversion Sponsor Presby Inspired Life
Project Description Cantrell Place will be an affordable housing development for low-income senior citizens (62 and older), including units for mobility impaired, sensory impaired, and homeless seniors. **Only 40 units in this property will use RAD vouchers.** Two buildings, one three-story and one four-story, will have a total of 61 one-bedroom units. The development will provide physical amenities such as a multi-purpose room, in-building laundry facilities, a green roof, a resident’s garden, parking, and elevators for easy mobility. The development will also have space to provide social services to the residents.

Post-Conversion Bedroom Size

	Total # of Units		# of RAD Units
0 BR	0		0
1 BR	61		40
2 BR	0		0
3 BR	0		0
4 BR	0		0
5 BR	0		0
6 BR	0		0

Transfer of Assistance Yes
De Minimis Reduction N/A
Transfer of Waiting List This is a new construction project. A new site-based waiting list will be established for the development prior to the initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA’s Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Development Name	Scattered Sites		
PIC Development ID #	PA002000906, PA002000907, PA002000909		
Conversion Type (PBV or PBRA)	PBV		
Capital Fund Grant (FY16)	\$115,608.02		
Pre-Conversion Total Units	40		
Pre-Conversion Unit Type	PBV		
Pre-Conversion Bedroom Size	AMP PA002000906	AMP PA002000907	AMP PA002000909
	# of Units	# of Units	# of Units
0 BR	0	0	0
1 BR	0	0	0
2 BR	0	4	0
3 BR	2	0	13
4 BR	1	2	0
5 BR	0	11	2
6 BR	0	1	4
Post-Conversion Total Units	60		
Post-Conversion RAD Units	40		
Post-Conversion Unit Type	PBV		
Post- Conversion Development Name and Address	Witherspoon 2050 S. 58th Street Philadelphia, PA 19143		
Post - Conversion Sponsor	Presby Inspired Life		
Project Description	Witherspoon Senior Apartments will be an affordable housing development for low-income senior citizens (62 and older), including units for mobility impaired, sensory impaired, and homeless seniors. Witherspoon will include 40 units of RAD vouchers only. Presby’s Inspired Life is developing the building on a campus that includes three existing Presby’s affordable senior housing properties. Witherspoon will involve the rehabilitation of an existing one-story former nursing home and the construction of one new floor above the existing structure to provide the 60 affordable rental units, community space and laundry room.		
Post-Conversion Bedroom Size	Total # of Units	# of RAD Units	
0 BR	0	0	
1 BR	60	40	
2 BR	0	0	
3 BR	0	0	
4 BR	0	0	
5 BR	0	0	
6 BR	0	0	
Transfer of Assistance	Yes		
De Minimis Reduction	N/A		
Transfer of Waiting List	This is a new construction project. A new site-based waiting list will be established for the development prior to the initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA’s Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.		

RAD Significant Amendment Attachment 1

Development Name Scattered Sites
PIC Development ID # PA002000905, PA002000910
Conversion Type (PBV or PBRA) PBV
Capital Fund Grant (FY16) \$198,702.11

Pre-Conversion Total Units 64
Pre-Conversion Unit Type PBV
Pre-Conversion Bedroom Size AMP PA002000905 AMP PA002000910

	# of Units		# of Units
0 BR	0		0
1 BR	0		0
2 BR	3		1
3 BR	6		6
4 BR	13		9
5 BR	15		1
6 BR	4		6

Post-Conversion Total Units 64
Post-Conversion RAD Units 64
Post-Conversion Unit Type PBV
Post- Conversion Development Name and Address Reynolds School
 1429 N 24th St, Philadelphia, PA
Post - Conversion Sponsor HELP V USA
Project Description The Reynolds School will rebuild the existing elementary school into 64 units of affordable housing. The property is being developed by HELP Development Corp., whose mission is to provide a diversity of affordable housing options for the homeless, those at risk of homelessness, and veterans.

Post-Conversion Bedroom Size

	Total # of Units		# of RAD Units
0 BR	0		0
1 BR	47		47
2 BR	17		17
3 BR	0		0
4 BR	0		0
5 BR	0		0
6 BR	0		0

Transfer of Assistance Yes
De Minimis Reduction N/A
Transfer of Waiting List This is a substantial rehab project. A new site-based waiting list will be established for the development prior to the initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Development Name Scattered Sites
PIC Development ID # PA002000908
Conversion Type (PBV or PBRA) PBV
Capital Fund Grant (FY16) \$153,003.50

Pre-Conversion Total Units 50
Pre-Conversion Unit Type PBV
Pre-Conversion Bedroom Size

	# of Units
0 BR	0
1 BR	0
2 BR	1
3 BR	30
4 BR	6
5 BR	6
6 BR	7

Post-Conversion Total Units 80
Post-Conversion RAD Units 50
Post-Conversion Unit Type PBV
Post- Conversion Development Name and Address The Beury Building
 3701 North Broad Street
Post - Conversion Sponsor Shift Capital
Project Description

The Beury Building involves re-development of a vacant 13 story building in North Philadelphia. The project will consist of a mixed-income, mixed-use development, including 50 affordable and 30 market rate one-bedroom apartments and 25,000 SF of retail and office space.

Post-Conversion Bedroom Size

	Total # of Units	# of RAD Units
0 BR	0	0
1 BR	80	50
2 BR	0	0
3 BR	0	0
4 BR	0	0
5 BR	0	0
6 BR	0	0

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

This is a substantial rehab project. A new site-based waiting list will be established for the development prior to the initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

RAD Significant Amendment Attachment 1

Development Name Scattered Sites
PIC Development ID # PA002000902
Conversion Type (PBV or PBRA) PBV
Capital Fund Grant (FY15) \$74,778.50

Pre-Conversion Total Units 25
Pre-Conversion Unit Type PBV
Pre-Conversion Bedroom Size

	# of Units
0 BR	0
1 BR	1
2 BR	4
3 BR	13
4 BR	1
5 BR	5
6 BR	1

Post-Conversion Total Units 30
Post-Conversion RAD Units 25
Post-Conversion Unit Type PBV
Post- Conversion Development Name and Address 1315 N. 8th Street
 1315 North 8th Street, Philadelphia, PA 19122.
Post - Conversion Sponsor Project Home
Project Description

Project HOME will develop 30 one-bedroom affordable units, of which 25 will be supported by RAD vouchers. The development will be located on the middle portion of a parcel bounded by Perth, Thompson and Eighth Streets in the West Poplar neighborhood of Philadelphia. The completed building (which will be the 1st phase of a planned two phase development) will consist of 36,547± SF of affordable housing and ancillary supportive services and property management space on the 13,028± SF site. The project will provide needed high quality affordable housing in the West Poplar neighborhood just north of Center City and adjacent to the quickly redeveloping Fishtown, Northern Liberties and Kensington areas.

Post-Conversion Bedroom Size

	Total # of Units	# of RAD Units
0 BR	0	0
1 BR	30	25
2 BR	0	0
3 BR	0	0
4 BR	0	0
5 BR	0	0
6 BR	0	0

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

This is a new construction project. A new site-based waiting list will be established for the development prior to the initial lease up. The owner will manage and maintain the site-based waiting list, including any PHA-approved selection preferences, in accordance with PHA's Housing Choice Voucher program Administrative Plan. PHA will post information on how to apply for the PBV site-based waiting list on the PHA website.

Moving to Work Annual Plan Amendment
Rental Assistance Demonstration Significant Amendment
Attachment 2 – Project Based Voucher Program (PBV)

Information on resident rights and participation, waiting list and grievance procedures for Rental Assistance Demonstration (RAD) program conversions to the Project Based Voucher (PBV) program are included in this attachment:

HUD PIH Notice 2012-32, REV-3 dated January 12, 2017, Sections 1.6.C and 1.6.D

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

~~the unit must be of the same quality and amenities as the unit it is replacing). Assistance may float from a Section 504 accessible unit only to another Section 504 accessible unit that has the same bedroom size and accessibility features. Units that float are not specifically designated under the HAP Contract. Therefore, the requirements in 24 CFR § 983.203(e) that the HAP Contract provide “the location of each contract unit” and “the area of each contract unit” are waived. Instead, the HAP Contract must specify the number and type of units in the property that are designated as RAD units, including any excepted units. From the time of the initial execution of the PBV RAD HAP Contract, the property must maintain the same number and type of RAD units, including the same number and type of Section 504 accessible units. Floating units are subject to all of the requirements in this Notice and the PBV regulations, including physical inspections, rent adjustments, and income mixing requirements. The alternative requirements with respect to floating units do not apply to non-RAD PBV units.~~

C. PBV Resident Rights and Participation.

- 1. No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.³² Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, this provision shall apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units

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

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

2. **Right to Return.** See section 1.4.A.5(ii) and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident’s right to return.
3. **Renewal of Lease.** Since publication of the PIH Notice 2012-32 Rev 1, the regulations under 24 CFR part 983 have been amended requiring Project Owners to renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.
4. **Phase-in of Tenant Rent Increases.** If a tenant’s monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of “total tenant payment” (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section “Calculated PBV TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

Three Year Phase-in:

³³ For non-RAD PBV households, applicable program requirements includes the requirement that any admission to the project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time.

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full Calculated PBV TTP³⁴

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications – Full Calculated PBV TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the Calculated PBV TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies must also implement a three or five-year phase-in for impacted residents, but may alter the terms above as long as it establishes a written policy setting forth the alternative terms.

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

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

to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding and may use that funding to serve PH, HCV and/or PBRA participants in its FSS program. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.³⁵ Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

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

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the

³⁵ The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

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

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

7. **Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.
 - i. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be :
 - a. A reasonable period of time, but not to exceed 30 days:
 - ii. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - iii. In the event of any drug-related or violent criminal activity or any felony conviction;
 - b. Not less than 14 days in the case of nonpayment of rent; and
 - c. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

 - ii. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For issues related to tenancy and termination of assistance, PBV program rules require the Project Owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi),³⁶ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
 - ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.
- b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
- c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- d. The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

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

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the

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

provision in 24 CFR § 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants that move into the property following conversion or tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver.

- 9. Jobs Plus.** Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance at that site unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project.
- 10. When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice.³⁷ In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all

³⁷ For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC.

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

- 11. Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

D. PBV: Other Miscellaneous Provisions

- 1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
- 2. Additional Monitoring Requirement.** The Owner must submit to the administering PHA and the PHA's Board must approve the operating budget for the Covered Project annually in accordance with HUD requirements.³⁸

³⁸ For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of monitoring and evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** This section has been moved to 1.4.A.13 and 1.4.A.14.
4. **Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
 - i. Transferring an existing site-based waiting list to a new site-based waiting list.
 - ii. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
 - iii. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
 - iv. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

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

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

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

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).³⁹

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

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c).

5. **Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
6. **Agreement Waiver.** This section has been moved to 1.6.B.8.
7. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing

³⁹ For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

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

- 8. Administrative Fees for Public Housing Conversions During the Year of Conversion.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds. For example, if the project’s assistance converts effective July 1, 2015, the public housing ACC between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV HAP Contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.

PHAs operating HCV program typically receive administrative fees for units under a HAP Contract, consistent with recent appropriation act references to “section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Work Responsibility Act of 1998” and 24 CFR § 982.152(b). During the year of conversion mentioned in the preceding paragraph, these provisions are waived. PHAs will not receive Section 8 administrative fees for PBV RAD units during the year of conversion.

After the year of conversion, the Section 8 ACC will be amended to include Section 8 funding that corresponds to the units covered by the Section 8 ACC. At that time, the regular Section 8 administrative fee funding provisions will apply.

- 9. Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA’s HCV program becomes PBV assistance, it is possible for most or all of a PHA’s turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant-based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing an alternative requirement for PHAs where, as a

result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD.

The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) of the Act and 24 CFR § 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

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

~~1.7 Special Provisions Affecting Conversions to PBRA~~

~~Under the Demonstration, HUD has the authority to waive statutory and regulatory provisions governing the PBRA program, or to establish alternative requirements for the effective conversion of assistance. Additionally, the RAD Statute imposes certain unique requirements and authorizes HUD to establish requirements for converted assistance under the demonstration.~~

~~For public housing projects converting assistance to PBRA under the First Component of the Demonstration, 24 CFR part 880, Section 8 Housing Assistance Payments Program for New~~



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

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

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

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

1.1. Purpose

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

¹ While this Notice addresses fair housing and civil rights requirements and relocation requirements, the fair housing and civil rights requirements are not limited to relocation issues.

² Consistent with PIH Notice 2012-32 (HA) REV-2 (PIH 2012-32 (HA) REV-2) (the “RAD Notice”), this Notice uses the term “PHA” to refer to the owner of the project prior to the RAD conversion and “Project Owner” to refer to the owner of the project after the RAD conversion.

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

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

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

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

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

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

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

1.2. PHA and Project Owner Responsibilities

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

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

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

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

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

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

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

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

1.3. Applicability

The content of this Notice should not be relied upon in carrying out any other activities funded under any other HUD program, except where specifically directed by HUD.

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

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

⁵ For example, the front-end review is specific to an individual site. A PHA that does not promote fair housing choice outside areas of minority concentration and continues to site affordable housing in minority concentrated areas may be in noncompliance with the duty to affirmatively further fair housing and other fair housing and civil rights obligations, even if the specific site is approved based on the information provided and pursuant to the front-end review of the PHA's site and neighborhood standards submission.

⁶ See 24 C.F.R. § 5.105 and, as applicable, 24 C.F.R. § 983.57(b)(2) or Appendix III of the RAD Notice.

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

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

1.4. Explanation of Major Provisions

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

Fair Housing & Civil Rights

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

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

Relocation

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

1.5. Request for Public Comment

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

1.6. Paperwork Reduction Act

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

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SECTION 3. Background

3.1. RAD Authority

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

3.2. Definitions

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

3.3. Applicable Legal Authorities

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

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

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

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

3.4. Further Information

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

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

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

⁸ See Pub. L. No. 112-55, as amended.

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

RAD transactions are governed by the same civil rights authorities that govern HUD-assisted activities generally.⁹ Converting Projects are subject to civil rights and equal opportunity requirements under the public housing regulations, and Covered Projects are subject to civil rights and equal opportunity requirements under the PBV regulations or the PBRA regulations, as applicable.¹⁰ As described further below, the Fair Housing Act prohibits discrimination in housing¹¹ and requires all federal executive departments and agencies to “administer their programs and activities relating to housing and urban development ... in a manner affirmatively to further” fair housing.¹² In addition, all programs or activities receiving Federal financial assistance are subject to Title VI of the Civil Rights Act of 1964 forbidding discrimination on the basis of race, color, and national origin¹³ and Section 504 of the Rehabilitation Act of 1973, which forbids discrimination on the basis of disability and requires that programs or activities receiving Federal financial assistance make such programs or activities “when viewed in its entirety” readily accessible to persons with disabilities and make reasonable accommodation to the needs of persons with disabilities.¹⁴ RAD transactions are also subject, as applicable, to the requirements of Titles II and III of the Americans with Disabilities Act, Executive Order 11063, and HUD regulations at 24 C.F.R. part 107. Thus, as with the administration of all HUD programs and all HUD-assisted activities, fair housing and civil rights issues must be considered in the administration of the RAD program. PHAs must not implement actions and policies that may have a discriminatory effect on the basis of race, color, sex, national origin, religion, disability, or familial status or that may impede, obstruct, prevent, or undermine efforts to affirmatively further fair housing.¹⁵ Note, in particular, the following requirements:

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

⁹ See 24 C.F.R. § 5.105.

¹⁰ See, e.g., 24 C.F.R. §§ 880.601, 881.601 and 983.8 for civil rights related regulations applicable to PBV and PBRA transactions.

¹¹ See 42 U.S.C. §§ 3601 *et seq.*, and HUD regulations in 24 C.F.R. part 100

¹² 42 U.S.C. § 3608(d) and (e).

¹³ See 42 U.S.C. §§ 2000d *et seq.*, and HUD regulations in 24 C.F.R. part 1.

¹⁴ See 29 U.S.C. §§ 701 *et seq.*, and HUD regulations in 24 C.F.R. part 8.

¹⁵ See 24 C.F.R. part 1 and part 100 subpart G.

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

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

¹⁶ 24 C.F.R. § 5.150 *et seq.*

¹⁷ *See* 24 C.F.R. § 5.150 *et seq.* and 24 C.F.R. §§ 91.225, 91.325, or 91.425.

¹⁸ *See* 24 C.F.R. § 1.4(b)(3).

¹⁹ *See* 24 C.F.R. § 1.4(b)(6).

²⁰ *See* 24 C.F.R. § 8.4(b)(5).

²¹ *See* 28 C.F.R. § 35.130(b)(4); 28 C.F.R. § 36.301.

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

- **Effective Communication for Persons with Disabilities:** Communications and materials must be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 C.F.R. § 8.6) and with 49 C.F.R. § 24.5, and as applicable, the Americans with Disabilities Act. This includes ensuring that, unless such actions would result in undue financial and administrative burdens or fundamental alterations, notices and resident meetings are provided in appropriate alternative formats as needed, e.g., Braille, audio, large type, accessible electronic communications, assistive listening devices, and sign language interpreters. Even in cases where the proposed actions may result in undue financial and administrative burdens or fundamental alterations, certain actions must still be taken. Specifically, appropriate auxiliary aids and services that would not result in such undue burdens or fundamental alterations must still be provided to ensure effective communication.
- **Accessible Meeting Facilities for Persons with Disabilities:** Pursuant to regulations implementing Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, as applicable, all programs and activities must be held in accessible locations unless doing so would result in an undue financial and administrative burden on the PHA and/or Project Owner, in which case the PHA or Project Owner must take any action that would not result in such undue burden but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity, e.g., briefings at an alternate accessible site or in-home briefing.²³ Individuals with disabilities must receive services in the most integrated setting appropriate to their needs. The most integrated setting appropriate to the needs of qualified individuals with disabilities is a setting that enables individuals with disabilities to interact with persons without disabilities to the fullest extent possible.²⁴

²² For more information about LEP obligations, see HUD's Limited English Proficiency (LEP) Frequently Asked Questions guidance at

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq#q26.

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

²⁴ See 28 C.F.R. part 35, Appendix B.

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

Accessibility requirements also apply during all stages of a RAD transaction, including during relocation. Existing information (e.g., resident characteristics forms, including identification of the need for accessible unit features; records of approved reasonable accommodations; and records of the presence of accessible unit features) and the residents themselves should be consulted throughout the process of developing and implementing a RAD conversion. Related activities include, but are not limited to:

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

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

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

- Reasonable Accommodations in Rules, Policies, Practices and Services:** Under the Fair Housing Act, the PHA or Project Owner must make reasonable accommodations in rules, policies, practices, and services when such accommodations may be necessary to afford a person with a disability an equal opportunity to use and enjoy a dwelling.²⁶ Under Section 504, the PHA or Project Owner must also make reasonable accommodations to residents with disabilities, which may include providing and paying for structural modifications to dwelling units and public or common use areas. Titles II and III of the ADA provide similar requirements. Common examples of reasonable accommodations that may occur during relocation are permitting an individual with a disability to relocate near public transportation, providing a unit larger than otherwise permitted for a live-in aide, and making exceptions to no-animal rules for assistance and service animals. Accommodations generally need not be made where providing such an accommodation would be an undue financial and administrative burden or a fundamental alteration of the nature of the service. However, reasonable accommodations must be made to the extent the accommodation does not impose an undue financial and administrative burden or a fundamental alteration of the nature of the service. Reasonable accommodations must follow the individual with the disability throughout the RAD process, including during relocation. Furthermore, PHAs and Project Owners may be required to provide particular reasonable accommodations during relocation, such as assistance moving household items.²⁷
- Physical Changes to Dwelling Units, Public and Common Use Areas and Other Facilities for Accessibility:** Under the Fair Housing Act, the PHA or Project Owner may be required to permit reasonable modifications. A reasonable modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. Reasonable modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. A request for a reasonable modification may be made at any time during the tenancy. When relocating an individual with a disability who has such modifications in their dwelling unit or public and common use areas because of the individual's disability, regardless of who made them, the PHA or Project Owner has an obligation to provide and pay for such modification in the new dwelling. When considering requests by individuals with disabilities for structural changes to units or public and common use areas, PHAs and Project Owners should take particular note that they may be required to make and pay for such structural modifications as reasonable

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

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

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

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

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

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

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

5.1. RAD Eligibility Review

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

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

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

5.2. PHA's Proposed Site Selection and Certification

For all RAD conversions, the PHA must comply with all applicable site selection requirements as set forth in this Notice and the RAD Notice and in accordance with any additional applicable published guidance provided by HUD. As set forth in the RAD Notice, conversions of assistance to PBV involving new construction, whether on a new site or on a current site, are subject to the site selection standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (e), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2). All other conversions to PBV, including transfers of assistance to an existing property other than the Converting Project, are subject to the standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (d), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2).²⁸ Site selection requirements set forth at Appendix III of the RAD Notice apply to RAD conversions to PBRA assistance, as does the requirement not to place housing in neighborhoods with highly concentrated poverty based on the criteria formulated for transfers under Section 8(bb) of the United States Housing Act of 1937.²⁹ PBV and PBRA site selection must also be consistent with the requirements of the Fair Housing Act, Title VI, Section 504, the ADA and their implementing regulations.

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

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

²⁸ See the provisions of Section 1.6.A.4 of the RAD Notice.

²⁹ 42 U.S.C. § 1437f(bb).

³⁰ For RAD conversions to PBRA, the RAD Notice uses the term "the site and neighborhood is suitable," rather than "the site is suitable." See Appendix III of the RAD Notice, paragraph (a).

³¹ See 24 C.F.R. § 983.57 and the RAD Notice at Section 1.4(A)(7)

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

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

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

³² See 24 C.F.R. § 983.57(b)(2) (PBV conversions); *see also*, Appendix III (a) of the RAD Notice (PBRA conversions).

³³ See 28 C.F.R. § 35.130(b)(4).

³⁴ In conducting its review prior to certification, and in preparing for the certification, PHAs and Project Owners may find it useful to consult with their local or regional FHEO office, the United States Access Board, local or state

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

5.3. RAD Front-End Civil Rights Transaction Review

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

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

A) Activities Subject to Front-End Civil Rights Review

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

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

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

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

- (2) Transfers of assistance where all or a portion of the Converting Project's assistance is transferred to a new site(s) (either new construction or to an existing project) as part of the subject transaction. Front-end review of this activity shall be pursuant to Section 5.5(B), below and, in addition, the PHA shall certify in its Annual Plan compliance with site and neighborhood standards applicable to existing housing as described in Section 5.2.
- (3) Conversions of assistance where the total number of units in the Covered Project is less than the original number of units in the Converting Project (this includes de minimis reductions). Front-end review of this activity shall be pursuant to Section 5.6.
- (4) Conversions of assistance where the Covered Project's unit configuration is different from the unit configuration of the Converting Project. Front-end review of this activity shall be pursuant to Section 5.6.
- (5) Conversions involving a change in occupancy, where the Covered Project serves a different population from the one served by the Converting Project (e.g., when a Converting Project serves families but the Covered Project is subject to an elderly preference or introduction of restrictions or preferences based on age or disability that will change the occupancy of the property). Front-end review of this activity shall be pursuant to Section 5.6.
- (6) Conversions of assistance in which the construction schedule indicates that relocation is likely to exceed 12 months. Front-end review of this activity shall be pursuant to Section 5.7(A).
- (7) Conversions of assistance involving new construction or substantial alteration,³⁵ as those terms are defined in Section 504 of the Rehabilitation Act of 1973. Front-end review of this activity shall be pursuant to Section 5.7(B).
- (8) Conversions of assistance involving a Converting Project subject to a Voluntary Compliance Agreement or Conciliation Agreement with HUD or a Consent Decree or Settlement Agreement with the U.S. Department of Justice or HUD, or where the PHA is subject to such an agreement affecting its entire housing portfolio or otherwise related to the Converting Project. Front-end review of this activity shall be pursuant to Section 5.7(C).

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

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

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

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

B) Fair Housing, Civil Rights, and Relocation Checklist

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

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

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

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

C) Timing of Front-End Review Submissions

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

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

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

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

D) Completion of HUD's Front-End Review

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

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

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

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

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

A) Conditions Triggering Review

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

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

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

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

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

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

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

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

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

B) Analysis of Areas of Minority Concentration

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

- (1) For purposes of RAD, a site is considered to be in an area of minority concentration when either (i) the percentage of persons of a particular racial or ethnic minority within the area of the site is at least 20 percentage points higher than the percentage of that minority group in the housing market area as a whole or (ii) the total percentage of minority persons within the area of the site is at least 20 points higher than the total percentage of minorities in the housing market area as a whole.³⁹
- (2) For purposes of RAD, the analysis of an area of minority concentration will use census tracts to approximate the "area" of the site but the analysis may consider alternate proposed geographies instead of the census tract in instances where there is strong evidence that such geography is more appropriate. Strong evidence that an alternative geography is more appropriate includes: (i) that the site is close to the edge of the census tract, (ii) that the population of the census tract is heavily influenced by the size of the Converting Project, or (iii) that the local community

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

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

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

C) *The Sufficient Comparable Opportunities Exception*

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

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

⁴⁰ For further explanation, see, e.g., *King v. Harris*, 464 F.Supp.827, 839-41 (E.D.N.Y. 1979).

⁴¹ Items (i) and (ii) are consistent with a Core Based Statistical Area as defined by the Office of Management and Budget. For reference, a Core Based Statistical Area consists of the county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core.

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

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

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

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

⁴² See 24 C.F.R. § 983.57(e)(3)(iv) and Appendix III of the RAD Notice, paragraph (e)(1)(A).

⁴³ 24 C.F.R. § 983.57(e)(3)(iii); see also Appendix III of the RAD Notice, paragraph (e)(1).

⁴⁴ 24 C.F.R. § 983.57(e)(3)(v); see also Appendix III of the RAD Notice, paragraph (e)(1)(B).

⁴⁵ 24 C.F.R. § 983.57(e)(3)(v)(A) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(i).

⁴⁶ Note that this factor is in reference to comparable assisted units that may or may not be in the PHA’s portfolio. The presumption stated at the end of this Section (i.e., that sufficient comparable opportunities exist if at least 50% of the comparable hard units in the PHA’s portfolio, including PBV developments using the PHA’s subsidy, are outside areas of minority concentration) is focused on units within the PHA’s portfolio.

⁴⁷ 24 C.F.R. § 983.57(e)(3)(v)(B) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(ii).

⁴⁸ 24 C.F.R. § 983.57(e)(3)(v)(C) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(iii).

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

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

⁴⁹ 24 C.F.R. § 983.57(e)(3)(v)(D); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(iv).

⁵⁰ 24 C.F.R. § 983.57(e)(3)(v)(E); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(v).

⁵¹ 24 C.F.R. § 983.57(e)(3)(v)(F); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(vi).

⁵² 24 C.F.R. § 983.57(e)(3)(v)(G) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(vii).

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

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

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

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

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

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

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

D) The Overriding Housing Needs Exception

As noted in Section 5.4(A), the second exception under which the site and neighborhood standards permit new construction in areas of minority concentration is if the project is necessary to meet overriding housing needs that cannot be met in that housing market area. The new construction site selection standards under RAD⁵⁵ outline two examples of circumstances, consistent with fair housing and other civil rights objectives, that would permit the application of the overriding housing needs exception: (1) when the site is “an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood;” or (2) when the site is “located in a neighborhood experiencing significant private investment that is demonstrably improving the economic character of the area (a “revitalizing area”).”⁵⁶

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

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

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

⁵⁵ See 24 C.F.R. § 983.57(e)(2) for PBV transactions and paragraph (e) of Appendix III of the RAD Notice for PBRA transactions.

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

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

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

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

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

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

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

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

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

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

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

A) *Applicable Standards*

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

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

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

B) Analysis of Transfers of Assistance

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

- (1) The accessibility of the proposed site for persons with disabilities;
- (2) The ability of the RAD conversion to remediate accessibility concerns;
- (3) Whether the transfer of assistance would result in assisted units being located in an area where the total percentage of minority persons is significantly higher than the total percentage of minority persons in the area of the original public housing site or in an area where the percentage of persons of a particular racial or ethnic minority is significantly higher than the percentage of that minority group in the area of the original public housing site.⁶⁰ For purposes of this analysis, HUD will examine the minority concentration of:
 - (a) the census tract of the original public housing site compared to the census tract of the proposed site; and
 - (b) an area comprised of the census tract of the original public housing site together with all adjacent census tracts compared to an area comprised of the census tract of the proposed site together with all adjacent census tracts.
- (4) Whether the site selection has the purpose or effect of:
 - (a) Excluding individuals from, denying them the benefits of, or subjecting them to discrimination under the RAD program or the applicable rental assistance program;
 - (b) Excluding qualified individuals with disabilities from or denying them the benefit of the RAD program or the applicable rental assistance program, or otherwise subjecting them to discrimination;
 - (c) Defeating or substantially impairing the accomplishment of the objectives of the RAD program or the applicable rental assistance program with respect to qualified individuals with disabilities; and

⁵⁹ 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, paragraphs (a) through (d). The site selection standards for existing/rehabilitated housing do not apply the minority concentration test used for new construction found at 24 C.F.R. § 983.57(e)(3) and Appendix III of the RAD Notice, paragraph (e).

⁶⁰ While this review is not explicitly called out in 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, it is derived from HUD's and the PHA's obligations to comply with civil rights laws and regulations, including those referenced in 24 C.F.R. § 983.57(b)(2) and Appendix III of the RAD Notice.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

⁶³ See Section 1.4.A.4 of the RAD Notice.

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

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

B) Review of Changes in Occupancy Type

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

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

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

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

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

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

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

C) Remedial Agreements and Orders.

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

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

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

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

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

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

⁶⁵ *See* 24 C.F.R. § 200.610.

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

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

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

SECTION 6. RELOCATION REQUIREMENTS

In some cases, as explained in this Section, the activities associated with the RAD transaction may require the relocation of residents. In the event of acquisition, demolition, construction or rehabilitation activities performed in connection with a RAD conversion, the PHA and/or Project Owner⁶⁶ should plan such activities to reasonably minimize any disruption to residents’ lives, to ensure that residents are not exposed to unsafe living conditions and to comply with applicable relocation, fair housing and civil rights requirements. As discussed in Section 6.1, below, a written relocation plan is required in some circumstances and strongly encouraged for any conversion resulting in resident moves or relocation. Further, the obligations due to relocating residents under RAD are broader than URA relocation assistance and payments and RAD specifies requirements which are more protective of residents than standard URA requirements, including additional notices (see Section 6.6) and a right to return (see Section 6.2). This Notice requires that certain information be provided to all households, beginning prior to submission of the RAD application.

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

⁶⁶ Under the URA, the term “displacing agency” refers to the agency or person that carries out a program or project which will cause a resident to become a displaced person. Projects vary and, for any specific task described in this Notice, the displacing agency may be either the PHA or the Project Owner, as determined by the allocation of roles and responsibilities between the PHA and Project Owner.

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

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

6.1. Planning

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

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

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

⁶⁷ 42 U.S.C. § 4601 *et seq.*, 42 U.S.C. § 5304(d), and their implementing regulations at 49 C.F.R Part 24 and 24 C.F.R. Part 42 subpart C.

⁶⁸ A nonexclusive listing of persons who do not qualify as displaced persons under URA is at 49 C.F.R. 24.2(a)(9)(ii). See also, Paragraph 1-4(J) of HUD Handbook 1378. See Section 6.5 of this Notice for discussion of the date of "initiation of negotiations."

⁶⁹ The Checklist refers to the existing FHEO Accessibility and Relocation Checklist until a revised Checklist is approved for use pursuant to the Paperwork Reduction Act.

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

Stage	Activities
1. Prior to submission of RAD application	<ul style="list-style-type: none"> • Determine potential need for relocation in connection with proposed conversion plans. • Meet with residents to discuss proposed conversion plans, communicate right to return, and solicit feedback. • Provide the <i>RAD Information Notice</i> (RIN) to residents as described in Section 6.6(A) of this Notice.
2. After submission of RAD application	<ul style="list-style-type: none"> • Assess the need for relocation planning in connection with proposed conversion plans. Determine if technical assistance would be beneficial to ensuring compliance with relocation requirements. • Survey residents to inform relocation planning and relocation process. • Develop a relocation plan (see Appendix II for recommended content). • Prepare Significant Amendment to PHA Plan and engage with the Resident Advisory Board, residents and the public regarding Plan amendment.⁷⁰
3. Following issuance of the CHAP, or earlier if warranted	<ul style="list-style-type: none"> • Provide the <i>General Information Notice</i> (GIN) to residents when the project involves acquisition, rehabilitation, or demolition as described in Section 6.6(B) of this Notice and relocation may be required.
4. While preparing Financing Plan	<ul style="list-style-type: none"> • Discuss the outlines of the conversion plans and their impact on relocation with the HUD transaction manager. • Refine the plan for relocation and integrate the construction schedule into the relocation strategy; seek to minimize off-site or disruptive relocation activities. • Identify relocation housing options . • Budget for relocation expenses and for compliance with accessibility requirements. • Submit the Checklist and, where applicable, the relocation plan. • If the conversion involves acquisition, at the discretion of the Project Owner issue Notice of Intent to Acquire (NOIA). • If a NOIA is issued, at the discretion of the Project Owner provide residents with appropriate relocation notices as

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

Stage	Activities
	described in Section 6.6(C) through 6.6(E) of this Notice at this time.
5. From RAD Conversion Commitment (RCC) to Closing	<ul style="list-style-type: none"> • Meet with residents to describe approved conversion plans and discuss required relocation. • The effective date of the RCC marks the date of “Initiation of Negotiations” (ION), as defined in the URA (49 § C.F.R. 24.2(a)(15)). • If no NOIA was provided while preparing the Financing Plan, provide residents with appropriate relocation notices as described in Section 6.6(C) through 6.6(E) of this Notice. • Resident relocation may begin following the effective date of the RCC, subject to applicable notice requirements.
6. Post-Closing	<ul style="list-style-type: none"> • Ongoing implementation of relocation • Notify the residents regarding return to the Covered Project as described in Section 6.6(F) of this Notice • Implementation of the residents’ right to return

6.2. Resident Right to Return

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

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

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

⁷¹ The right to return is not a right to any specific unit in the Covered Project. Tenancies other than public housing or Section 8 assisted residents (such as commercial tenants) do not hold a right to return and are subject to standard relocation requirements applicable to such tenants under the URA.

⁷² See the RAD Notice for a description of the procedures that must be undertaken if a resident is over-housed.

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

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

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

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

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

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

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

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

6.3. Admissions and Continued Occupancy Requirements

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

6.4. Types of Moves and Relocation

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

A) Moves within the same building or complex of buildings⁷⁶

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

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

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

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

B) Temporary relocation lasting one year or less

If a resident is required to relocate temporarily, to a unit not in the same building or complex of buildings, for a period not expected to exceed one year in connection with the RAD conversion, the resident's temporarily occupied housing must be decent, safe, and sanitary and the resident must be reimbursed for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation. These expenses include, but are not limited to, moving expenses, increased housing costs (e.g., rent and utilities), meals if the temporary housing lacks cooking facilities (e.g., during a short hotel stay, whether or not on an emergency basis) and other applicable expenses.⁷⁸

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

In the event that a resident has been temporarily relocated, to a unit not in the same building or complex of buildings, for a period which was anticipated to last one year or less but the temporary relocation in fact exceeds one year, the resident qualifies as a "displaced person" under the URA and as a result immediately becomes eligible for all permanent relocation assistance and payments as a "displaced person" under the URA, including notice pursuant to Section 6.6(E). This assistance would be in addition to any assistance the person has already received for temporary relocation, and may not be reduced by the amount of any temporary relocation assistance.

In such event, the PHA or Project Owner shall offer the resident the opportunity to choose to voluntarily permanently relocate with the offered URA assistance or to choose to remain temporarily relocated based on updated information from the PHA or Project Owner about when they can return to the completed RAD unit. The PHA or Project Owner must present this opportunity to the resident when the temporary relocation extends beyond one year and each time thereafter that the temporary relocation extends beyond the previously anticipated duration. In presenting such opportunity, the PHA or Project Owner must inform the resident in writing that his or her acceptance of voluntary permanent relocation, with the associated assistance, would terminate the resident's right to return to the Covered Project. The PHA or Project Owner must provide the resident with at least 30 days to decide whether to remain in temporary relocation status or to voluntarily relocate permanently.

D) Temporary relocation anticipated to last more than one year

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

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

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

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

E) Permanent moves in connection with a transfer of assistance

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

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

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

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

F) Voluntary permanent relocation

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

6.5. Initiation of Negotiations (ION) Date

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

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

6.6. Resident Relocation Notification (Notices)

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

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

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

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

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

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

A) *RAD Information Notice*

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

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

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

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

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

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

For RAD, the GIN must do at least the following:

- Inform the resident that he or she may be displaced for the project and generally describe the relocation payment(s) for which the resident may be eligible, the basic conditions of eligibility, and the procedures for obtaining the payment(s);
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she will be given reasonable relocation advisory services, including referrals to replacement properties, help in filing payment claims, and other necessary assistance to help the displaced resident successfully relocate;
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she will not be required to move without 90 days advance written notice;
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she cannot be required to move permanently unless at least one comparable replacement dwelling has been made available;
- Inform the resident that any person who is an alien not lawfully present in the United States is ineligible for relocation advisory services and relocation payments, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child (see 49 C.F.R. § 24.208(h) for additional information);
- Describe the resident's right to appeal the PHA's determination as to a resident's eligibility for URA assistance; and
- Inform the resident that the RAD transaction will be completed consistent with fair housing and civil rights requirements, and provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

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

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

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

D) RAD Notice of Relocation

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

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

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

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

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

- (1) The notice must state the anticipated duration of the resident's relocation.
- (2) The notice must specify which entity (the PHA or the Project Owner) is primarily responsible for management of the resident's relocation and for compliance with the relocation obligations during different periods of time (i.e., before vs. after Closing).
- (3) For residents who will be relocated for twelve months or less:
 - The PHA or Project Owner must provide this notice a minimum of 30 days prior to relocation.⁸⁴ PHAs or Project Owners may deem it appropriate to provide longer notice periods for persons who will be temporarily relocated

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

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

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

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

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

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

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

- The PHA or Project Owner must provide this notice a minimum of 90 days prior to relocation of residents.⁸⁵
- The notice must offer the choice to be temporarily relocated, thereby preserving the resident's right to return, or the choice to be voluntarily permanently relocated pursuant to the procedures set forth in Section 6.10, together with guidance that the resident has at least thirty (30) days to consider the choice.
- For residents who voluntarily elect to be permanently relocated, the 90-day notice period may only begin once the PHA or Project Owner has made available at least one comparable replacement dwelling consistent with 49 C.F.R. § 24.204(a).⁸⁶
- The notice must describe the available relocation assistance, the estimated amount of assistance based on the individual circumstances and needs, and the procedures for obtaining the assistance. The notice must be specific to the resident and his or her situation so that the resident will have a clear understanding of the type and amount of payments and/or other assistance the resident household may be entitled to claim.
- The notice must comply with all requirements for a URA Notice of Relocation Eligibility as described in 49 C.F.R. § 24.203(b).

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

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

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

⁸⁶ PHAs should note that URA regulations also require, where possible, that three or more comparable replacement dwellings be made available before a resident is required to move from his or her unit.

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

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

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

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

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

⁸⁷ To illustrate, consider the following examples.

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

F) Notification of Return to the Covered Project

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

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

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

6.7. Relocation Advisory Services

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

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

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

a manner that satisfies the requirements of Title VI of the Civil Rights Act of 1964, the Fair Housing Act, and Executive Order 11063 (49 C.F.R. § 24.205(c)(1)).⁸⁹ Such advisory services under the URA may include counseling to ensure that residents affected by the project understand their rights and responsibilities and the assistance available to them (49 C.F.R. § 24.205(c)). In addition, the PHA or Project Owner should inform residents that if they believe they have experienced unlawful discrimination, they may contact HUD at 1-800-669-9777 (Voice) or 1-800-927-9275 (TDD) or at <http://www.hud.gov>.

6.8. Initiation of Relocation

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

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

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

6.9. Records and Documentation; Resident Log

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

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

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

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

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

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

- Date of the GIN
- Date of the CHAP
- Date of NOIA
- Date of RAD Notice of Relocation
- Date of URA Notice of Relocation Eligibility
- Date of most recent consent to voluntary permanent relocation⁹¹
- Date of relocation away from the Converting Project or Covered Project
- Dates of any intermediate relocation moves
- Date of return to the Covered Project or to the household's post-closing permanent address.⁹²
- The following information for each resident household, as applicable:
 - The type of move (e.g., the types identified in Section 6.4, above)
 - The form of any temporary relocation housing (e.g., hotel, assisted housing, market-rate housing)
 - The address and unit size of any temporary relocation housing
 - Whether alternative housing options were offered consistent with Section 6.10, below
 - Any material terms of any selected alternative housing options
 - The type and amount of any payments for
 - Moving expenses to residents and to third parties
 - Residents' out-of-pocket expenses
 - Rent differential payments or other payments for temporary or permanent rental assistance, together with the rent and utilities (if applicable) that were the basis for the calculations
 - Any other relocation-related compensation or assistance

6.10. Alternative Housing Options

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

A) Requirements for Any Offer of Alternative Housing Options

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

⁹¹ The most recent consent must be within 180 days of the actual relocation date, as discussed in Section 6.10(D).

⁹² In the case of voluntary permanent relocation, the date of “return” may be the same as the date of relocation away from the Converting Project.

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

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

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

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

B) Assisted Housing Options as Alternatives

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

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

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

PHA's admission preferences and other applicable policies and procedures set forth in the Section 8 Administrative Plan.

- Homeownership programs subject to the applicable program rules
- Other options as may be identified by the PHA and/or Project Owner

C) Monetary Elements Associated With Alternative Housing Options

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

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

D) Disclosure and Agreement to Alternative Housing Options

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

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

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

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

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

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

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

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

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

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

6.11. Lump Sum Payments

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

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

SECTION 7. APPLICABILITY OF HCV AND PUBLIC HOUSING REQUIREMENTS

7.1. HCV Waiting List Administration Unrelated to the RAD Transaction

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

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

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

7.2. HCV Waiting List Administration Related to the RAD Transaction

From time to time, a PHA may wish to use HCV resources as a relocation option in connection with a RAD transaction. In order to do so, a PHA must modify its Section 8 Administrative Plan to provide a preference for relocating RAD residents and the PHA is subject to Section 6.8 of this Notice relating to initiation of relocation. Further, if a PHA provides a preference for relocating RAD residents, the PHA must be explicit regarding the nature of the HCV as a relocation resource. If the PHA anticipates using the HCV as a temporary relocation resource, the PHA must recognize that it cannot rescind an HCV once issued to the resident (i.e., the family would have to voluntarily relinquish their voucher and may choose to remain in the HCV program indefinitely). The PHA must also provide a preference for admission to the Covered Project in order to satisfy the right to return. Alternatively, if the PHA anticipates using the HCV as a voluntary permanent relocation resources, the PHA must comply with the alternative housing options provisions of Section 6.10.⁹⁷

7.3. Public Housing Transfers Unrelated to the RAD Transaction

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

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

⁹⁸ Title IV, section 40001-40703.

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

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

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

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

7.5. Public Housing as a Temporary Relocation Resource

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

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

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

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

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

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

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

7.7. Right-Sizing

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

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

Edward L. Golding
Principal Deputy Assistant Secretary for
Housing

APPENDIX I: Applicable Legal Authorities

APPENDIX II: Recommended Relocation Plan Contents

APPENDIX I: Applicable Legal Authorities

Part 1

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

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

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

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

The Fair Housing Act also requires HUD to administer HUD programs and activities in a manner that affirmatively furthers fair housing (42 U.S.C. § 3608(e)(5)). HUD’s affirmatively furthering fair housing (“AFFH”) rule in 24 C.F.R. §§ 5.150-5.180 will apply to PHAs (except for qualified PHAs) for the PHA’s fiscal year that begins on or after January 1, 2018 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5. The affirmatively furthering fair housing regulations will apply to qualified PHAs, for the PHA’s fiscal year that begins on or after January 1, 2019 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5.¹⁰¹

¹⁰⁰ See 42 U.S.C. § 3604(f)(3)(c) and 24 C.F.R. § 100.205.

¹⁰¹ For purposes of the AFFH rule, “[a]ffirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing under the AFFH rule means taking meaningful actions that, taken together, address

Additional detail and discussion of the interplay between the Fair Housing Act, Section 504, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

United States Housing Act of 1937 (1937 Act)

The United States Housing Act of 1937 (1937 Act) (42 U.S.C. § 1437c-1(d)(15)) requires PHAs to submit a 5-year plan and an Annual Plan. Pursuant to HUD regulations, the Annual Plan includes a certification by the PHA that the PHA will affirmatively further fair housing.

Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*) and HUD's implementing regulation (24 C.F.R. part 1) prohibit recipients of Federal financial assistance from discriminating, excluding from participation, or denying benefits to, any person on the basis of race, color, or national origin. In addition, Title VI regulations prohibit HUD recipients of Federal financial assistance from utilizing criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin (24 C.F.R. § 1.4(b)(2)(i)). When determining the site or location of housing, recipients may not make selections with the purpose or effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination on the ground of race, color, or national origin (24 C.F.R. § 1.4(b)(3)). An applicant or recipient of HUD financial assistance also has an obligation to take reasonable action to remove or overcome the consequences of prior discriminatory practices regardless of whether the recipient engaged in discriminatory conduct (24 C.F.R. § 1.4(b)(6)).

Recipients of Federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities for persons who have limited ability to read, speak, or understand English – i.e., individuals who have limited English proficiency (LEP). This includes oral and written communications during relocation and throughout a RAD transaction. Such language assistance may include, but is not limited to, providing written translation of notices regarding the plans for the project and relocation and oral interpretation at meetings. Otherwise, LEP persons may be denied participation in, and the benefit of, the recipients' program or activity. On January 22, 2007, HUD issued "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (LEP Guidance), available at: http://www.lep.gov/guidance/HUD_guidance_Jan07.pdf.¹⁰²

significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws." 24 C.F.R. § 5.150. Meaningful actions means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity. See 24 C.F.R. § 5.152.

¹⁰² See also Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, which requires recipients of Federal financial assistance to take reasonable steps to provide meaningful access to

Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 provides: “No otherwise qualified individual with a disability in the United States . . . shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, service or activity receiving Federal financial assistance.”¹⁰³

Among other things, HUD’s regulations implementing Section 504 (in 24 C.F.R. part 8) prohibit recipients of Federal financial assistance, in determining the site or location of a facility receiving such assistance, from making site selections the purpose or effect of which would (1) exclude qualified individuals with disabilities from or deny them the benefits of a program or activity, or otherwise subject them to discrimination; or (2) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities.¹⁰⁴ These prohibitions apply to both determining the site of permanent facilities and a site for relocation of residents.

Furthermore, HUD’s implementing regulations prohibit discrimination, the denial of benefits, or the exclusion of participation of individuals with disabilities from the programs or activities of recipients of federal financial assistance because a recipient’s facilities are inaccessible. Such recipients must provide qualified individuals with disabilities with program access, which may require modification of architectural features of facilities in RAD transactions for individuals with disabilities to have access to the program. Certain architectural specifications apply to facilities that are altered or newly constructed with HUD financial assistance, such as facilities where assistance is transferred and facilities used as temporary or permanent relocation sites for residents of a project undergoing a RAD conversion. If alterations are made to a housing facility, the alterations to dwelling units in the facility are required, to the maximum extent feasible (i.e., if doing so would not impose undue financial and administrative burdens on the operation of the project), to be made readily accessible to and usable by individuals with disabilities. If alterations taken to a development that has 15 or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility (except when it requires removal of structural load-bearing members), or if the facility is newly constructed, then a minimum of 5% of the total dwelling units, or at least one unit in a development, whichever is greater, must be made accessible for persons with mobility impairments. An additional 2% of the units, but not less than one unit, in a development must be accessible for persons with hearing and vision impairments.

In addition, regulations implementing Section 504 require recipients to make reasonable accommodations for persons with disabilities. A reasonable accommodation is a change, adaptation, or modification to a policy, program, service, or workplace which will allow a qualified person with a disability to participate fully in a program, take advantage of a service, or perform a job. Section 504 also includes effective communication requirements, such as

their programs and activities for LEP persons. E.O. 13166 directs all Federal agencies, including HUD, to issue guidance to help recipients of Federal financial assistance in providing such meaningful access to their programs.

¹⁰³ 29 U.S.C. § 794. HUD’s Section 504 regulation that applies to recipients of Federal financial assistance, including PHAs and Project Owners, is located at 24 C.F.R. part 8.

¹⁰⁴ 24 C.F.R. § 8.4(b)(5).

providing interpreters and alternate format documents (e.g., Braille, large print, accessible electronic communications) for persons with disabilities.

Additional detail and discussion of the interplay between Section 504, the Fair Housing Act, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

Titles II and III of the Americans with Disabilities Act

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in all services, programs, and activities provided or made available by public entities. Title II of the ADA applies to housing developed or operated by state and local governments, which includes a PHA. Title III of the ADA prohibits discrimination on the basis of disability by public accommodations and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. For example, Title III applies to rental offices, sales offices, homeless shelters, hotels and motels, and commercial spaces associated with housing, such as daycare centers, social service offices, and sales and retail establishments. Titles II or III also will generally apply to community spaces and facilities, such as neighborhood networks, to computer centers (including the computers in the centers), and to transportation services and conveyances provided by PHAs and Project Owners.

Additional detail and discussion of the interplay between Titles II and III of the Americans with Disabilities Act, the Fair Housing Act, and Section 504 of the Rehabilitation Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

Section 109

Section 109 of the Housing and Community Development Act of 1974 (HCDA of 1974), Title I, prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex in Community Development Block Grant (CDBG) programs and activities. Section 109 applies to RAD projects that receive CDBG or other assistance under Title I of the HCDA of 1974.

In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 to ensure that individuals are not subjected to discrimination on the basis of race, color, national origin, disability, age, religion, or sex by recipients of CDBG funds. Section 109 charges HUD with enforcing the right of individuals to live in CDBG-funded housing and participate covered programs and activities free from such discrimination. However, this additional statutory authority only applies to programs authorized under Title I of the HCDA of 1974, such as CDBG and programs, such as Section 108 loan guarantees and the Historically Black Colleges and Universities program.

Equal Access to HUD-assisted or HUD-insured Housing

HUD requires its housing programs to be open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status. HUD recipients and subrecipients must comply with 24 C.F.R. § 5.105(a)(2) when determining eligibility for housing assisted with HUD

funds or subject to an FHA-insured mortgage, and when making such housing available. This includes making eligibility determinations and making housing available regardless of actual or perceived sexual orientation, gender identity, or marital status, and prohibiting inquiries about sexual orientation or gender identity for the purpose of making eligibility determinations or making housing available. Applicants are encouraged to become familiar with these requirements, HUD's definitions of sexual orientation and gender identity at 24 C.F.R. § 5.100, clarifications to HUD's definition of family at 24 C.F.R. § 5.403, and other regulatory changes made through HUD's Equal Access Rule, published in the Federal Register at 77 FR 5662 (Feb. 3, 2012).

Section 3: Economic Opportunities for Low- and Very Low-income Persons.

Certain HUD programs require recipients of assistance to comply with Section 3 of the Housing and Urban Development Act of 1968 (Section 3), 12 U.S.C. § 1701u (Economic Opportunities for Low- and Very Low-Income Persons in Connection with Assisted Projects), and the HUD regulations at 24 C.F.R. part 135. The regulations at 24 C.F.R. part 135 implementing Section 3 ensure, to the greatest extent feasible, that training, employment, contracting and other economic opportunities be directed to low- and very low-income persons, especially recipients of government assistance for housing, and to businesses that provide economic opportunities to low- and very low-income persons where proposed project is located. Recipients of funds covered by Section 3 must comply with 24 C.F.R. part 135, particularly subpart B-Economic Opportunities for Section 3 residents and Section 3 Business Concerns, and Subpart E-Reporting and Recordkeeping. HUD encourages recipients to search the national Section 3 Business Registry to find local businesses that prioritize hiring Section 3 residents.

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 USC § 4601 *et seq.* (URA) is a Federal law that establishes minimum standards for programs or projects receiving Federal financial assistance that include the acquisition of real property (real estate) and/or displace persons from their homes, businesses, or farms as a result of acquisition, rehabilitation, or demolition.¹⁰⁵ The URA implementing Federal regulations can be found at 49 C.F.R. part 24. Project-Based Voucher (PBV) and Project-Based Rental Assistance (PBRA) are considered Federal financial assistance for purposes of the URA. As a result, the URA will apply to acquisitions of real property and relocation of persons from real property that occur as a direct result of acquisition, rehabilitation or demolition for a project that involves conversion of assistance to PBV or PBRA programs under RAD.

¹⁰⁵ For additional guidance, see HUD Handbook 1378 Tenant Assistance, Relocation, and Real Property Acquisition), available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/library/relocation/policyandguidance/handbook1378.

Section 104(d) of the Housing and Community Development Act of 1974

Section 104(d) of the Housing and Community Development Act of 1974, as amended, 42 USC § 5304(d), (Section 104(d)), is a Federal law that applies when a lower-income dwelling is demolished or converted (as conversion is defined in accordance with 24 C.F.R. § 42.305) to a use other than lower-income housing in connection with a Community Development Block Grant Program (CDBG) or HOME Investment Partnerships Program (HOME) funded activity. Under Section 104(d), a lower-income person is considered displaced and, therefore eligible for Section 104(d) relocation assistance if the person permanently moves from real property or permanently moves personal property from real property as a direct result of the demolition or conversion of a lower-income dwelling to a use other than lower-income dwelling unit in connection with a CDBG or HOME funded activity. The Section 104(d) one-for-one replacement housing requirements may apply with respect to occupied and vacant occupiable lower-income dwelling units that are demolished or converted to a use other than lower-income dwelling units in connection with CDBG or HOME funded activity. Section 104(d) implementing regulations can be found at 24 C.F.R. part 42, Subpart C. Additional HUD policy and guidance for Section 104(d) is available in HUD Handbook 1378, Chapter 7.

Part 2 – Accessibility Requirements

Federal accessibility requirements apply to all RAD projects – whether they include new construction, alterations, or existing facilities. Applicable laws include, but are not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, and Titles II or III of the Americans with Disabilities Act (ADA). A PHA or Project Owner must comply with each law that applies to its project and with the requirement that provides the most accessibility when two or more laws apply. All three laws include new construction requirements. Substantial alterations, additions, rehabilitation and existing facilities must be in compliance with applicable requirements of Section 504 and the ADA.¹⁰⁶ All three laws may also require reasonable accommodations or modifications.

Accessibility Requirements for New Construction

The Fair Housing Act requires all “covered multifamily dwellings” designed and constructed for first occupancy after March 13, 1991, to be readily accessible to and usable by persons with disabilities. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas must meet the Fair Housing Act’s design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas must meet the Fair Housing Act’s design and construction requirements. The Fair Housing Act requires that all covered multifamily dwellings be designed and constructed so that public and common use areas are readily accessible to and usable by persons with disabilities; all doors are sufficiently wide to allow passage by persons using wheelchairs; all units contain accessible routes into and through the dwelling unit; light switches, electrical outlets, thermostats, and other environmental controls are in accessible locations; reinforcements are installed in bathroom walls to allow later installation

¹⁰⁶See 24 C.F.R. § 100.205 (Fair Housing Act) and 24 C.F.R. §§ 8.22 and 8.23 (Section 504). See also 28 C.F.R. § 35.151(b) and 28 C.F.R. part 36 (ADA Titles II and III regulations, respectively).

of grab bars; and kitchens and bathrooms are usable such that a person in a wheelchair can maneuver about the space.¹⁰⁷ These design and construction requirements apply whether the housing is privately or publicly funded, including housing supported by tax credits.¹⁰⁸

New construction of a multifamily housing project containing five or more dwelling units is also subject to physical accessibility requirements under Section 504. Under Section 504, a “project” includes all residential and appurtenant structures, equipment, roads, walks, and parking lots which are covered by a single contract or application for Federal financial assistance, or are treated as a whole for processing purposes, whether or not they are located on a single site.¹⁰⁹ The accessibility standards for new construction under Section 504 are the Uniform Federal Accessibility Standards (UFAS).¹¹⁰ HUD recipients may also use the 2010 ADA Standards for Accessible Design under title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”). This option exists until HUD formally revises its Section 504 regulation to adopt an updated accessibility standard. Refer to HUD’s Deeming Notice for more information.

Section 504 also requires that a minimum of 5% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with mobility impairments. An additional 2% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with vision and hearing impairments.¹¹¹ HUD may prescribe a higher percentage or number of units upon request by any affected recipient or by any State or local government or agency based upon demonstration to the reasonable satisfaction of HUD of a need for a higher percentage or number, based on census data or other available current data, or in response to evidence of a need for a higher percentage or number received in any other manner. In reviewing such request or otherwise assessing the existence of such needs, HUD shall take into account the expected needs of eligible persons with and without disabilities.¹¹²

Title II of the ADA prohibits discrimination on the basis of disability in all services, programs, and activities provided or made available by public entities. Title II of the ADA applies to housing programs, including housing developed or operated by state and local governments, which includes PHAs. Title III of the ADA prohibits discrimination on the basis of disability by public accommodations, including rental offices, and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. All newly constructed or altered facilities, including facilities altered to

¹⁰⁷ See 24 C.F.R. § 100.205.

¹⁰⁸ For more information about the design and construction provisions of the Fair Housing Act, see www.fairhousingfirst.org. See also the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Accessibility (Design and Construction) Requirements for Covered Multifamily Dwellings Under the Fair Housing Act (April 30, 2013), available at: www.hud.gov/offices/fheo/library/hudjointstatement.pdf.

¹⁰⁹ See 24 C.F.R. § 8.3.

¹¹⁰ The UFAS are available at <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/ufas>). See also 24 C.F.R. § 8.32.

¹¹¹ See 24 C.F.R. § 8.22.

¹¹² See HUD regulation at 24 C.F.R. § 8.22(c).

comply with program access and readily achievable barrier removal obligations that exist under Titles II or III of the ADA, must comply with the U.S. Department of Justice's ADA architectural accessibility standards as described in the following U.S. Department of Justice Technical Assistance document ADA Requirements, Effective Date/Compliance Date (Feb. 2011), http://www.ada.gov/revised_effective_dates-2010.htm.

Accessibility Requirements for Alterations

If a building was constructed for first occupancy after March 13, 1991, the building must be in compliance with, and all alterations must maintain the building's accessible features so that the building continues to meet, the Fair Housing Act's accessibility requirements. In addition, without regard to the date of construction for first occupancy, certain alterations may be required under the Fair Housing Act if requested by a resident as a reasonable accommodation or modification or otherwise required to remediate accessibility deficiencies in the design and construction of the building.

Under HUD's Section 504 regulation, alterations include any structural change in a facility or a change to its permanent fixtures or equipment. If alterations are undertaken to a project that has fifteen or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility, this qualifies as "substantial alterations," in which the new construction provisions of 24 C.F.R. § 8.22 apply.¹¹³

When alterations are made that do not qualify as substantial alterations, alterations to dwelling units in a multifamily housing project shall, to the maximum extent feasible, be made to be readily accessible to and usable by individuals with disabilities.¹¹⁴ If alterations of single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, the entire dwelling unit shall be made accessible. Once 5% of the dwelling units in a housing project are readily accessible to and usable by individuals with mobility impairments, no additional elements of dwelling units or entire dwelling units are required to be accessible under this provision. However, alterations to meet ongoing accessibility needs are always required, for example, in response to a reasonable accommodation request. Alterations to common areas or parts of facilities that affect accessibility of existing housing facilities shall, to the maximum extent feasible, be made to be accessible to and usable by individuals with disabilities. For purposes of this paragraph, the phrase "to the maximum extent feasible" shall not be interpreted as requiring that a recipient (including a PHA) make a dwelling unit, common area, facility or element thereof accessible if doing so would impose undue financial and administrative burdens on the operation of the multifamily housing project.¹¹⁵

All altered facilities covered by Titles II or III of the ADA must be altered in accordance with the U.S. Department of Justice's 2010 ADA Standards for Accessible Design and applicable ADA

¹¹³ See 24 C.F.R. § 8.23(a). The sole exception is that load bearing structural members are not required to be removed or altered.

¹¹⁴ HUD may require a higher number or percentage of accessible units pursuant to 24 C.F.R. § 8.22(c) and 24 C.F.R. § 8.23(b)(2).

¹¹⁵ 24 C.F.R. § 8.23(b).

regulations, unless subject to certain safe harbors identified in the 2010 ADA revised regulations for Titles II and III, as applicable.¹¹⁶

HUD will consider on a case-by-case basis a PHA's request to undertake limited new construction on the site of a Covered Project undergoing rehabilitation to comply with accessibility requirements on the site.

Additional Accessibility Requirements for Both New Construction and Alterations

Accessible units must be distributed throughout projects and sites and be available in a sufficient range of sizes and amenities so that a qualified individual with disabilities' choice of living arrangements is, as a whole, comparable to that of other persons eligible under the same program.¹¹⁷ This provision shall not be construed to require provision of an elevator in any multifamily housing project solely for the purpose of permitting location of accessible units above or below the accessible grade.

PHAs are encouraged to use universal design principles, visitability principles and active design guidelines in planning new construction or retrofit work, wherever feasible. However, adherence to universal design principles does not replace compliance with the accessibility requirements of Section 504, the ADA and the Fair Housing Act.

Program Accessibility Requirements

Under Section 504, recipients must operate each existing housing program or activity receiving Federal financial assistance so that the program or activity, when viewed in its entirety, is accessible to and usable by individuals with disabilities. Title II of the ADA also includes a program access requirement, while Title III of the ADA requires readily achievable barrier removal.¹¹⁸ Further, Section 504, the Fair Housing Act, and the ADA require that reasonable accommodations/modifications be granted to address disability-related needs of individuals with disabilities.¹¹⁹

¹¹⁶ See <http://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards.htm>.

¹¹⁷ See 24 C.F.R. §§ 8.26 and 8.27.

¹¹⁸ See 28 C.F.R. § 35.150; 28 C.F.R. § 36.304.

¹¹⁹ For more information on reasonable accommodations, see the HUD/DOJ Joint Statement on Reasonable Accommodations Under the Fair Housing Act at <http://portal.hud.gov/hudportal/documents/huddoc?id=JOINTSTATEMENT.PDF>. While this joint statement focuses on the Fair Housing Act, the principles discussed in the statement generally apply to requests for reasonable accommodation under Section 504, except, for purposes of Section 504, HUD recipients are required to provide and pay for structural modifications as a reasonable accommodation.

APPENDIX II: Recommended Relocation Plan Contents

While RAD mandates written relocation plans only for projects which involve permanent relocation (including, without limitation, a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than one year, HUD strongly encourages PHAs to document their relocation planning process and procedures in a written relocation plan. The following provides suggested content for required and recommended relocation plans. In the case of any discrepancy between this description of the recommended relocation plan contents and the provisions of the Notice to which this Appendix is attached or any applicable laws or regulations with respect to the URA or Section 104(d), the provisions of the Notice or applicable laws and regulations shall govern.

The basic elements of the relocation plan include:

- A general description of the project and project elements that may create relocation needs;
- Information on residents of the project and eligibility for relocation assistance and payments;
- Information regarding how the project will address the RAD right to return requirements and the project's re-occupancy policies;
- A detailed discussion of plans for temporary relocation assistance;
- A detailed discussion of any transfer of assistance;
- A detailed discussion of any offers of alternative housing options and plans for voluntary permanent relocation assistance;
- A detailed discussion of compliance with fair housing and civil rights requirements, including accessibility requirements;
- The relocation budget; and
- The appeals process.

The plan as a whole should discuss the specific steps to be taken to minimize the adverse impacts of relocation on the residents.

I. Project Summary

The Relocation Plan should provide a general description of the property (e.g., year built, location, number of units, configuration, resident population served). The project summary should also identify the nature of the activities to be undertaken, including acquisition, demolition, rehabilitation, and construction activities and additional detail regarding the project scope (e.g., gut rehab, systems replacement, modest in-unit renovations, transfer of assistance). The project summary should also discuss how any construction activities are to be implemented (i.e., vacate the property entirely, vacate specific floors or buildings, rehabilitation with residents in place). The summary should also discuss the overall theory of relocation, for example, whether a few households will be relocated off-site and the vacant units will be used as temporary housing before other households move back to their original units (a "hoteling" approach), or whether the vacant units will be permanently occupied, with the residents vacating other units to be renovated (a "domino" approach).

The relocation plan should also identify the funding sources which may trigger relocation requirements, with particular attention to the potential presence of HOME or CDBG funds which may trigger Section 104(d) requirements.

II. Project Occupancy

The Relocation Plan should provide information on occupancy of the property including the number of residents, their household type (family, elderly), any non-residential (commercial) occupants, and should identify how any routine needs (such as continuation of utilities such as telephone service) and civil rights compliance issues (for example, limited English proficiency, disabilities, reasonable accommodations and unit modifications that have been or may be necessary) shall be identified and addressed. The Relocation Plan may specify the community meetings, interviews and/or other processes that will be undertaken to assess the residents' needs.

The Relocation Plan should also address eligibility for relocation assistance and payments, applying the rules of the Notice to the particularities of the project.

III. Resident Return and Re-occupancy Policies

The Plan should address how the project will honor the RAD right to return requirements and the “no re-screening upon conversion” policy. With respect to residents who will be temporarily relocated, the Plan should include the methodology that will be used to determine the sequence in which residents will re-occupy units at the project after rehabilitation, demolition, and/or construction is completed, and to determine how residents are matched with units if the residents are not able to return to their original unit. For example, if units will come online in stages, the plan should outline how the PHA or Project Owner will determine when each resident will return to the property.

IV. Temporary Relocation Assistance

The plan should detail the temporary housing resources to be used, the anticipated duration of temporary relocations, notices to be provided and the temporary relocation assistance the PHA or Project Owner will provide for residents (Paragraph 2-7 of HUD Handbook 1378). Topics to be addressed in the Plan include:

- Temporary Housing Resources. The Plan should identify the nature and availability of the temporary housing resources the PHA or Project Owner anticipates using. On-site resources are generally preferred. However, in some cases, PHAs or Project Owners may need to use hotel rooms for short-term relocations, or market-rate apartments. If the PHA or Project Owner anticipates using other assisted housing resources (such as HCVs, public housing or other properties with regulatory restrictions), the PHA or Project Owner should take particular care to address regulatory issues.
- Allocation of Temporary Relocation Resources. The Plan should describe a fair and reasonable methodology for allocating temporary relocation housing to residents on a nondiscriminatory basis.
- Duration of Temporary Relocation. In the event that the Plan includes relocation which is anticipated to exceed one year, it should detail the requirements which apply to those

residents (such as the issuance of a *Notice of Relocation* to the resident covering eligibility for URA relocation assistance, the offer of permanent relocation assistance and payments at URA levels and, if conditions warrant, the subsequent issuance of a *Notice of Eligibility*) as distinct from requirements that apply to residents who are not relocated for more than one year.

- Packing and Moving Assistance. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
 - Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
 - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
 - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
 - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses. The PHA or Project Owner can choose to do one or more of the following:
 - Undertake the moves itself, using employees of the PHA or Project Owner or “force account labor”¹²⁰
 - Use a contractor or moving company
 - Reimburse residents for all actual, reasonable and necessary moving expenses.
- Storage. The Plan should address whether storage of the resident’s personal property is necessary and the arrangements for such storage.
- Damage or Loss. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or the replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
- Out-of-Pocket Expenses. The nature of out of pocket expenses vary based on the nature of the temporary relocation moves. For example, hotel stays or in-place renovation may trigger the need for reimbursement of meals while a kitchen is unavailable. The Plan should outline the anticipated out-of-pocket expenses and the PHA’s or Project Owner’s plans and budget with respect to these expenses.
- Leasing Arrangements. The Plan should address whether the resident will have a direct lease or other contractual relationship with the owner of the temporary relocation resource or whether the PHA or Project Owner will hold the lease and the resident will maintain a contractual relationship with the PHA or Project Owner.
- Utility Costs. The Plan should address whether residents will need to disconnect and reconnect necessary utilities and, if so, how the PHA or Project Owner anticipates managing this process and any associated expenses. Necessary utilities may include telephone, cable service, Internet access or other items. The Plan should address payment of utility deposits, if required at the temporary relocation housing (HUD Handbook 1378, paragraph 2-7(A)(3)).

¹²⁰ Defined at 24 C.F.R. 905.108.

- Reasonable Accommodations. The plan should address whether residents with disabilities will require reasonable accommodations during temporary relocation and, if so, how the PHA or Project Owner anticipates ensuring the provision of reasonable accommodations and any associated expenses. Reasonable accommodations may include, among other items, the provision of transportation assistance, relocation to locations which are physically accessible and located near public transportation, and modifications to policies to allow individuals with disabilities to reside with a live-in aide.

V. Transfer of Assistance

Relocation planning in the context of transfer of assistance is particularly complex. The PHA should address how RAD, URA and Section 104(d) requirements each apply, as the same activity may be treated differently under each regulatory framework. The Plan should specifically outline the PHA's procedures to ensure that the applicable requirements are applied to each situation appropriately. The Plan should also address whether relocation is required for any businesses or residents at the destination site. Finally, the Plan should address whether two moves – from the public housing site to an intermediate site and then to the transfer of assistance site – are necessary while the Covered Project is being constructed or rehabilitated.

VI. Alternative Housing Options and Voluntary Permanent Relocation Assistance

If the PHA or Project Owner seeks to offer alternative housing options, the Plan should identify those options and the manner in which they are presented to residents for decision. The plan should also outline the counseling the PHA or Project Owner will provide to assist the residents in determining what options may be available and the financial implications of those options, for example,

1. Discussion of whether units available in the market (either in the affordable market or the unrestricted market) will meet the financial and dwelling requirements of relocated residents;
2. The general area or location of unit(s);
3. Where applicable, the accessibility of such units for individuals with disabilities;
4. Criteria for receiving relocation assistance; and
5. Any other information that might benefit residents in their consideration of housing choices.

The Plan should identify how the PHA or Project Owner will work with any residents who have elected voluntary permanent relocation. The Plan should further include a description of the permanent relocation assistance the PHA or Project Owner will provide to such residents. Topics to be addressed in the Plan include:

- Replacement Housing. The Plan should address the availability of comparable replacement housing, the notices to be provided and the provisions to ensure that appropriate accessibility features are available in compliance with applicable laws and regulations.

- Fair housing considerations. The Plan should address referrals to housing not located in areas of minority concentration and compliance with requirements regarding accessible housing for persons with disabilities. The Plan should address how the PHA or Project Owner will determine if residents have paid for the acquisition and/or installation of accessible features in the housing from which they are being relocated and how the PHA or Project Owner will ensure that the replacement housing contains required and comparable accessible features or that the resident is appropriately compensated for the cost of acquiring and/or installing required and comparable accessible features.
- Packing and Moving Assistance. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
 - Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
 - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
 - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
 - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses consistent with 49 C.F.R. § 24.301 or, at the resident's option, 49 C.F.R. § 24.302.
- Storage. The Plan should address whether storage of the resident's personal property is necessary and the arrangements for such storage. See 49 C.F.R. § 24.301(g)(4).
- Damage or Loss. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or the replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
- Dislocation Allowance. The Plan should address when the resident is entitled to a dislocation allowance and the amount of such dislocation allowance, consistent with the URA Fixed Residential Moving Cost Schedule available at: www.fhwa.dot.gov/real_estate/uniform_act/relocation/moving_cost_schedule.cfm.
- Appliances. The Plan should address disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property.
- Security Deposits and Utility Costs. The Plan should address how the PHA or Project Owner anticipates managing transfer of utility arrangements, security deposits and any associated expenses. Utilities may include telephone, cable service, Internet access or other items that may have been in place in the resident's original home. See 49 C.F.R. § 24.301(h)(12).
- Replacement Housing Payment. The Plan should address the circumstances in which displaced residents may be entitled to a replacement housing payment (RHP) to cover the

increase, if any, in monthly housing costs for a 42-month period pursuant to URA requirements or a 60-month period pursuant to Section 104(d).¹²¹

VII. Relocation Budget

Based on the results of the planning process, the PHA or Project Owner should create a relocation budget that includes the following six components:

- 1) The cost of administering the plan and providing assistance and counseling.
- 2) Reasonable moving expenses for a person with disabilities, which may include the cost of moving assistive equipment that is the personal property of the residents, the furnishings and personal belonging of a live-in aide, and/or other reasonable accommodations (HUD Handbook 1378, Paragraph 3-2).
- 3) The cost of the physical move of the residents' belongings. (It is suggested that the move costs be broken down by average cost per move type multiplied by the number of moves.) This physical move cost total should be based on the move scenarios anticipated or projected by the resident survey. The move costs should consider:

For temporary relocation moves:

- Number and cost of two-way moves (i.e., a move to another unit and then a return move) within the same building/complex.
- Number and cost of two-way moves to a unit not in the same building/complex

For permanent moves:

- Number and cost of one-time moves into another unit in the same building/complex.
- Number and cost of one permanent move to a unit not within the same building/complex
- Any required dislocation allowance

- 4) The estimated cost of projected increases in monthly housing costs and other expenses for temporary relocation (if applicable).
- 5) The estimated cost of projected replacement housing payments (RHP) (42-month period for URA or 60-month period if Section 104(d) applies).
- 6) Contingency costs estimated for carrying out the relocation process necessary to complete the proposed project.

¹²¹ See also, CPD Notice 2014-09 "Effective Date of Moving Ahead for Progress in the 21st Century Act (MAP-21) Changes to Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) Payment Limits and Replacement Housing Payment Eligibility Criteria."

VIII. Written and Oral Communications with Individuals with Disabilities and LEP Persons and Use of Accessible Meeting Locations

The Plan should identify how the PHA or Project Owner will take appropriate steps to ensure effective communication with residents and other individuals with disabilities involved in the relocation, such as through the provision of sign language and other interpreters and large print, Braille, accessible electronic, and other alternate format written communications. The Plan should identify the measures to be taken to ensure the most integrated meeting settings appropriate to individuals with disabilities. The Plan should identify how the PHA or Project Owner will ensure meaningful access for LEP persons, such as through written materials and oral communications provided in languages other than English.

IX. Appeal Process

The Plan should specify the procedures to be followed if a resident disagrees with the PHA's or Project Owner's decision as to the resident's eligibility to receive relocation assistance, the amount of a relocation payment, or the adequacy of a comparable replacement dwelling offered to a resident. These procedures should include the process for filing a written appeal to the displacing agency and the specific appeal procedures to be followed consistent with 49 C.F.R. 24.10 (and 24 C.F.R. § 42.390 if Section 104(d) is involved).

X. Certification

The Plan should contain a certification of compliance with this Notice (or H 2014-09/PIH 2014-17, if applicable), the URA, fair housing and civil rights requirements and, if applicable, Section 104(d).

Technical Assistance

For detailed technical assistance regarding the contents or provisions of a written relocation plan, the PHA or Project Owner should direct questions to their RAD Transaction Manager or email rad@hud.gov.

NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD PHILADELPHIA HOUSING AUTHORITY

The Philadelphia Housing Authority (PHA) is a participant in the Moving to Work Demonstration Program (MTW) pursuant to an Amended and Restated Moving to Work Agreement (MTW Agreement) with the US Department of Housing and Urban Development (HUD). The MTW Agreement defines the terms and conditions under which PHA is a participant in the MTW Program and requires PHA to submit an MTW Annual Plan for HUD review and approval. PHA's MTW Annual Plan for Fiscal Year 2017 was approved by HUD on July 6, 2016 and subsequently amended and approved by HUD on September 6, 2016. PHA's FY 2018 MTW Annual Plan, which was submitted to HUD in January 2017, is pending HUD approval as of the publication date of this notice.

PHA is providing an opportunity for public review and comments on a proposed amendment to the MTW Annual Plan concerning PHA's plans to convert 220 long-term vacant and distressed public housing units at various scattered site locations to project-based assistance under the Rental Assistance Demonstration (RAD) program. The public housing assistance for these units will be converted and transferred to Project Based Voucher (PBV) assistance at five (5) new construction or substantial rehab developments as further described in the proposed amendment under the transfer of assistance provisions of RAD.

The proposed amendment provides additional information concerning PHA's RAD conversion plans. It will be incorporated in its entirety into PHA's then current MTW Annual Plan through an attachment entitled "Rental Assistance Demonstration Significant Amendment". It is available for public review and downloading on PHA's website at www.pha.phila.gov under the "Latest News" section or may be picked up at the following locations:

Housing Choice Voucher Program Office:

2850 Germantown Ave 1st Floor

Scattered Sites Management Offices:

Abbottsford Homes – 3226 McMichael Street

Wilson Park – 2500 Jackson Street

Westpark Apartments – 4445 Holden Street

Fairhill Apartments – 400 W. Huntington Street

Spring Garden Apartments – 715 Brandywine Street

Public Housing Management Offices:

Bartram - 5404 Gibson Drive

Raymond Rosen – 2110 N. 23rd Street

PHA will conduct a Public Hearing on the proposed amendment. PHA residents, Housing Choice Voucher participants and the general public are invited to attend and provide comments at the Hearing and/or to submit written comments during the public comment period. The Public Hearing is scheduled for the following time and location:

Wednesday, February 15, 2017 at 3:00 PM

12 South 23rd Street, 6th Floor

Philadelphia, PA 19103

The public comment period begins on January 27, 2017 at 12 noon and ends on February 27, 2017 at 12 noon. All comments must be received at PHA's office by the end of the comment period. Please send written comments to:

Philadelphia Housing Authority
Executive Office
Attention: MTW Plan Amendment Comment
12 South 23rd Street, Philadelphia, PA

The Public Hearing is being held in an accessible location. Persons who require assistance, sign language interpreter or other accommodations should call 215-684-5767 in advance of the Public Hearing. Please use the AT&T Relay Service for TTY.



Civil Rights Certification

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Civil Rights Certification**Annual Certification and Board Resolution**

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 Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing.

Philadelphia Housing Authority

PA002

PHA Name

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)

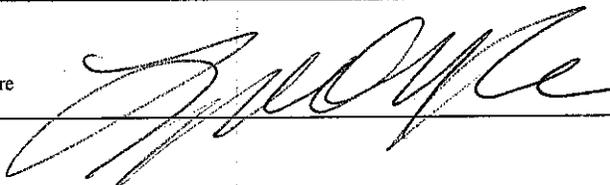
Name of Authorized Official

Lynette Brown-Sow

Title

Chair, Board of Commissioners

Signature



Date

4/19/17

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: Philadelphia Housing Authority

Project Name: PHA - MTW Annual Plan FY '18 - RAD 1st Significant Amendment

Location of the Project: The development and implementation of affordable housing and
economic development initiatives in Phila., in accord with the City's
ConPlan and AFFH. (2017 Consolidated Plan, adopted June, 2016)

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

Name of
Certifying Jurisdiction: City of Philadelphia, Office of Housing & Community Development

Certifying Official
of the Jurisdiction
Name: Frederick S. Purnell, Sr.

Title: Deputy Director, Division of Housing and Community Development

Signature: 

Date: 04/18/2017