

# **PHILADELPHIA HOUSING AUTHORITY**



## **MOVING TO WORK ANNUAL PLAN FISCAL YEAR 2019 (APRIL 1, 2018 TO MARCH 31, 2019)**

**SUBMITTED TO  
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

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**PHILADELPHIA HOUSING AUTHORITY  
MOVING TO WORK ANNUAL PLAN – FISCAL YEAR 2019**

**TABLE OF CONTENTS**

I. INTRODUCTION.....	1
II. GENERAL OPERATING INFORMATION .....	9
A. Housing Stock Information.....	9
Table 1: Planned New Public Housing Units in FY 2019 .....	9
Table 2: Planned Public Housing Units to Be Removed in FY 2019 .....	10
Table 3: RAD Conversions Planned in FY 2019.....	12
Table 3A: RAD Conversions Completed or Projected to be Completed by End of FY 2018.....	12
Table 4: New Housing Choice Vouchers to be Project-Based in FY .....	13
Table 5: Other Planned Activities.....	14
Table 6: Planned Capital Expenditures in FY 2019.....	16
Table 6A: Additional Planned Capital Projects and Estimated Budget.....	17
B. Leasing Information.....	20
Table 7: Planned Number of Households Served at End of FY 2019 .....	21
Table 7A: Non-MTW Voucher Programs: Planned Number of Households Served at End of FY 2019 .....	21
C. Waiting List Information .....	22
Table 8: Wait List Information Projected for Beginning of FY 2019 .....	23
III. PROPOSED MTW ACTIVITIES .....	25
MTW ACTIVITY 2019-01: OPENING DOORS TO AFFORDABLE HOMEOWNERSHIP .....	25
MTW ACTIVITY 2019-2: YOUTH EDUCATIONAL ENRICHMENT SERVICES.....	29
IV. APPROVED MTW ACTIVITIES.....	31
A. Implemented Activities .....	31
Activity 2011-1: Partnership Programs Initiative .....	31
Activity 2004-1: Neighborhood Development & Revitalization Initiatives .....	34
Activity 2004-2: Service-Enriched Housing for Seniors & People with Disabilities.....	37
Activity 2004-3: Simplification and Streamlining of Rent and Recertification Processes for Public Housing and HCV .....	39
Activity 2004-4: Unit-Based Leasing and Development Program .....	44
Activity 2005-2: Streamline the Admissions and Transfer Process .....	56
Activity 2005-3: HCV Program Efficiencies.....	58
Activity 2016-1: Second Chance Initiative.....	60
B. Activities on Hold .....	64

C. Closed Out Activities .....	65
<b>V. MTW SOURCES AND USES OF FUNDING .....</b>	<b>67</b>
A. Estimated Sources and Uses of MTW Funding for Fiscal Year 2019 .....	67
Table 9: Estimated Sources of MTW Funding for FY 2019 .....	67
Table 10: Estimated Uses of MTW Funding for FY 2019 .....	68
B. Use of Single Fund Flexibility .....	68
Table 11: Resident Services Program Summary for FY 2019.....	69
C. Local Asset Management Plan.....	71
<b>VI. ADMINISTRATIVE.....</b>	<b>72</b>
A. Resolution .....	72
B. Public Review Process .....	72
C. Evaluations.....	72
D. Annual Statement/Performance and Evaluation Report .....	72
<b>VII. APPENDICES.....</b>	<b>73</b>
Appendix A: RAD Significant Amendments .....	73
Appendix B: Replacement Housing Factor Funds .....	74
Appendix C: Annual Statement/Performance & Evaluation Report .....	75
Appendix D: Local Asset Management Plan.....	76
Appendix E: Asset Management Table .....	86
Appendix F: Planned Demo/Dispo Additional Documentation .....	107
Appendix G: MTW TDC/HCC .....	120
Appendix H: Impact Analyses: Rent Simplification.....	121
Appendix I: Board Resolution & MTW Certification.....	123

## **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 2019, i.e. the period from **April 1, 2018 to March 31, 2019**.

PHA has been an MTW agency since April 2001, operating under an MTW Agreement with the U.S. Department of Housing and Urban Development (HUD). The MTW Agreement, as amended, describes the authority and flexibility granted to PHA under the MTW program along with the requirements for participation. PHA's MTW Agreement with HUD extends 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 2019 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 including conversions of public housing to project-based assistance under the Rental Assistance Demonstration program.

The FY 2019 Annual Plan incorporates HUD's current reporting requirements as detailed in the HUD Form 50900 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 the near future.

### **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 continue to provide a framework for PHA's activities and resource allocation in FY 2019 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

In 2016, PHA and the City of Philadelphia collaborated on the development of an Assessment of Fair Housing (AFH) Plan in compliance with the December 2015 Affirmatively Further Fair Housing Final Rule. This extensive planning process involved PHA residents and a wide range of community stakeholders. The AFH Plan, including fair housing priority goals and strategies, was accepted by HUD in February 2017. 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 2019 MTW Annual Plan, and will help inform PHA's long-term MTW goals and objectives.

### **FY 2019 Goals and Objectives**

PHA will implement a coordinated, comprehensive program of capital improvements, housing and neighborhood development activities, maintenance and management initiatives, and resident supportive services in FY 2019. As PHA's funding for FY 2019 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 including PHA's Unit Based Leasing and Development Program, Rental Assistance Demonstration Program conversions and transfer of assistance developments, and the Partnership Initiative. 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.

- ***Neighborhood Transformation at Blumberg/Sharswood*** – PHA will continue and expand its ambitious efforts to implement the Blumberg/Sharswood Choice Neighborhoods Transformation Plan, which 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 neighborhood supermarket; development of a new PHA office facility; creation of new recreational facilities and green space; and, the establishment of a multipurpose neighborhood health and service center and high performing high school. In FY 2019, PHA plans to: begin rehabilitation of the Phase II senior tower, which consists of 94 rental units, and Phase III, which consists of 83 on-site rental units; finalize plans and financing for Phase IV, a 40-unit off-site rental phase to be developed by Michaels Development Company; begin Phase II of the rehab of the Vaux Community Building, which currently houses a new neighborhood high school, with new health care and other supportive services planned for the facility; implement a 21-unit homeownership phase in partnership with Habitat for Humanity; and, complete construction on PHA's new headquarters building on Ridge Avenue. PHA will also support after school and supportive service programming for low-income youth attending the new Big Picture Philadelphia High School in the Vaux Community Building.
- ***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 267 rental and 30 homeownership units, of which 147 will be replacement housing. In FY 2019, PHA plans to complete construction of 89 rental units (including 74 replacement units) as part of Norris Phase II and begin construction of an additional 50 Phase III rental units (including 22 replacement units).
- ***Rental Assistance Demonstration (RAD)*** – In FY 2019, PHA will expand 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 vacant, non-viable scattered sites to new projects developed throughout the City by PHA and other development partners. PHA projects that 1,285 units at both existing public housing sites and new transfer of assistance sites will have closed under the RAD program by the end of FY 2018. PHA plans to convert an additional 649 public housing units to project-based assistance through RAD in FY 2019.
- ***Opening Doors to Affordable Homeownership*** – PHA is proposing this new MTW activity to enhance and expand ongoing affordable, first time homeownership activities. The new program will build on and consolidate PHA's existing 5-h and Housing Choice Voucher Homeownership programs, while incorporating new elements including lease-purchase and down payment assistance options.

- ***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 2019. PHA will also continue to operate the SOAR program citywide, and 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 Opportunity Program in FY 2019 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. The program also involves a partnership with the Pennsylvania First Judicial Court returning citizen programs for public housing households.
- ***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 2019, 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 2019; 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 2019, PHA will continue to work on the development of modifications to the MTW FSS program. PHA has issued a Request for Proposals for FSS



program management services as part of a strategy to leverage additional resources for program participants and to improve educational, employment and other positive outcomes.

- ***Small Area Fair Market Rent Rule*** - Under HUD's rule regarding Small Area Fair Market Rents (SAFMRs), Philadelphia is one of the metropolitan areas 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's HCV participating families have to live in higher opportunity neighborhoods. PHA supports the concept of higher payment standards for higher opportunity areas; however, the HUD rule could impose serious hardships on existing residents. In the coming year, PHA intends to propose MTW alternatives, following consultation with owners and other stakeholders.<sup>1</sup>

Along with its MTW implementation activities, PHA will implement other initiatives in FY 2019 that do not specifically require MTW authority or Block Grant flexibility to administer. Highlights of PHA's planned Non-MTW activities include:

- ***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 2019, 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 actively collaborates with the City, social service and local non-profit agencies on a series of initiatives to reduce and help prevent homelessness, known as the Blueprint to End Homelessness program. The current Blueprint Memorandum of Understanding between the City and PHA extend to FY 2019. PHA will continue to work with the City to identify future strategies to support the Blueprint goal and may seek Board approval for an updated agreement.
- ***Right Sizing Occupancy Initiative*** – PHA's ongoing efforts to “right size” residents who are currently living in units that are too large for their current family composition, primarily residents of scattered site housing, will continue in FY 2019. 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. PHA expects that some residents may elect to purchase their homes rather than move, while other homes will be made available for new families on the waiting list as current residents move to smaller size units.
- ***Improving Access to PHA Programs and Services*** – PHA's Board-approved Limited English Proficiency (LEP) Policy continues to serve as the road map to ensure open access to

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<sup>1</sup> On January 2, 2018 - subsequent to the public hearing process and Board approval of the FY 2019 MTW Annual Plan -, HUD notified PHA that the SAFMR Final Rule is effective as of January 1, 2018. This represents a major change and complete reversal of HUD's August 2017 guidance, which suspended Philadelphia's SAFMR designation until October 2019. PHA is evaluating options to ensure timely compliance with the SAFMR Final Rule, which may include seeking HUD approval for MTW waivers to implement alternatives to the system mandated under the Final Rule.

PHA programs to non-English speakers as well as to individuals with hearing/sight disabilities. In FY 2019, PHA will complete a review of the current LEP Policy and, as needed, propose updates to the Plan for Board approval. PHA will also continue to update 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.

- ***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 2019, 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 2019, PHA plans to propose updates to the policy as needed to conform to recent HUD regulations.
- ***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 2019, PHA will administer existing grants and utilize MTW funds where feasible to leverage new grant opportunities. Existing grants include the Jobs Plus Pilot, Resident Opportunities and Self Sufficiency (ROSS) Service Coordinator, Project SOAR, Assets for Independence, Choice Neighborhoods, Congregate Housing Services and Family Self Sufficiency Coordinator Programs. In FY 2019, PHA will submit applications to continue funding existing programs, if funds are made available, and fund new programs that support PHA's Strategic Directions Plan. 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 plans to add 49 new public housing units to its inventory in FY 2019. The planned new units represent Phase 1 of the New Courtland at Henry Avenue development, as summarized on Table 1 below. The actual number of planned new public housing units may vary depending on several variables including changes to financing plans and construction schedules, HUD processing timetables and other factors.

In FY 2018, PHA competitively selected 19 additional planned housing developments consisting of 830 units for potential receipt of public housing subsidies under PHA's Unit Based program. As with Henry Avenue, the developments will be undertaken by third party partners. Construction is not anticipated to start until after FY 2019; therefore, these additional units are not listed on Table 1. The actual number of new public housing units developed under this competitive procurement may vary significantly from the 830 figure, based on receipt of Low Income Housing Tax Credits, final financing plans and other factors.

**Table 1: Planned New Public Housing Units in FY 2019**

AMP Name and Number	Bedroom Size							Total Units	Population Type	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
New Courtland at Henry Avenue Phase 1 (AMP TBD)	17	32	0	0	0	0	0	49	Senior	6	49
Total Public Housing Units to be Added								49			

#### 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 2019, PHA plans to demolish and/or dispose of a projected total of 734 units as summarized in Table 2, the majority of which are vacant, non-viable scattered site units. 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 in FY 2019\***

<b>PIC Dev.#/AMP and PIC Dev. Name</b>	<b>Number of Units to be Removed</b>	<b>Explanation for Removal</b>
PA2-014 Norris Apartments Phase III	28	Choice Neighborhoods RAD Conversion
PA2-903 Westpark Plaza	65	RAD Conversion of Existing Public Housing
PA2-132 Suffolk Manor	137	RAD Conversion of Existing Public Housing
PA2-137 Cambridge Plaza I	44	RAD Conversion of Existing Public Housing
PA2-901 Scattered Sites Haddington	21	RAD Transfer of Assistance
	2	Disposition of Vacant Lots
PA2-902 Scattered Sites Mantua	35	RAD Transfer of Assistance
	17	Disposition of Vacant Lots
PA2-903 Scattered Sites Kingsessing	20	RAD Transfer of Assistance
	3	Disposition of Vacant Lots
PA2-904 Scattered Sites Germantown	17	RAD Transfer of Assistance
	4	Disposition of Vacant Lots
PA2-905 Scattered Sites Fairhill Square	51	RAD Transfer of Assistance
	16	Disposition of Vacant Lots
PA2-906 Scattered Sites Francisville	18	RAD Transfer of Assistance
	23	Disposition of Vacant Lots
	3	Demo/Dispo of Non-viable structures
PA2-907 Scattered Sites Ludlow	12	RAD Transfer of Assistance
	4	Disposition of Vacant Lots
	2	Demo/Dispo of Non-viable structures
PA2-908 Scattered Sites Susquehanna	74	RAD Transfer of Assistance
	8	Disposition of Vacant Lots
PA2-909 Scattered Sites Strawberry Mansion	56	RAD Transfer of Assistance
	21	Disposition of Vacant Lots
	6	Demo/Dispo of Non-viable structures
PA2-910 Scattered Sites Oxford Jefferson	29	RAD Transfer of Assistance
	9	Disposition of Vacant Lots
	9	Demo/Dispo of Non-viable structures
<b>Total Number of Units to be Removed</b>		<b>734</b>

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

PHA will also submit applications to HUD to dispose of six (6) administrative building properties that are in excess of its needs due to the construction of the Agency's consolidated headquarters. The properties to be disposed of include:

- 712 N. 16<sup>th</sup> St.,

- 3400 Bartram Ave.,
- 3100 Penrose Ferry Rd
- 1800 S. 32<sup>nd</sup> St.
- 1606 Swain Ave. and
- 1201 W Somerset Ave.

PHA will sell or lease the administrative properties at fair market value based on an assessment of which option will generate the greatest benefit to PHA. PHA believes that the dispositions are in the best interest of PHA, its residents, and the City of Philadelphia.

### **Planned Rental Assistance Demonstration (RAD) Program Conversions**

PHA views the conversion of public housing units to project-based assistance under the RAD program as a critically important component of its housing preservation and expansion strategy. Through RAD conversion, PHA is able to access private equity (primarily through the Low Income Housing Tax Credit program) and other funds to invest in existing PHA developments as well as to leverage new funding to replace obsolete scattered site units and “transfer assistance” to other new developments. Table 3 below provides summary information on PHA’s current plans to convert existing public housing units to project-based assistance through the RAD program, and to transfer public housing assistance from vacant, non-viable scattered site units to new developments that will be subsidized through long-term project-based assistance contracts in FY 2019. 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 2018, including transfer of assistance developments.

The timetable for RAD conversions extends beyond FY 2019 and continues to be refined in consultation with HUD and PHA’s resident leadership. The listed projects may be modified in the future, and are subject to approval by HUD and the PHA Board of Commissioners. PHA may apply for additional RAD conversions beyond those shown in Tables 3 and 3A.

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.

As part of this FY 2019 MTW Annual Plan, in Appendix A, PHA has included RAD Significant Amendments which involve transfer of assistance from vacant, non-viable scattered site units to four new developments: Harlan Street, new construction to be developed by Michaels Development Company; Blumberg Phase III, new construction to be developed by PHADC as part of the Blumberg/Sharswood plan; Susquehanna Square, new construction to be developed by Community Ventures; and, the Walton School substantial rehabilitation, to be developed by PHADC. Additional Significant Amendments for other planned RAD developments will be submitted in the future.

**Table 3: RAD Conversions Planned in FY 2019**

<b>PIC Dev. /AMP # and PIC Dev. Name</b>	<b>RAD Units</b>	<b>Description</b>
PA2-014 Norris Apartments Phase III	28	Choice Neighborhoods RAD conversion
PA2-903 Westpark Plaza	65	Conversion of existing public housing development*
PA2-132 Suffolk Manor	137	Conversion of existing PAPMC public housing development
PA2-137 Cambridge Plaza I	44	Conversion of existing PAPMC public housing development
Scattered Site AMPS	74	Transfer of assistance from vacant and uninhabitable scattered sites to 27 <sup>th</sup> and Susquehanna new development
Scattered Site AMPS	22	Transfer of assistance from vacant and uninhabitable scattered sites to Harlan Street new development
Scattered Site AMPS	37	Transfer of assistance from vacant and uninhabitable scattered sites to Susquehanna Square new development
Scattered Site AMPS	83	Transfer of assistance from vacant and uninhabitable scattered sites to Blumberg Phase III new development
Scattered Site AMPS	44	Transfer of assistance from vacant and uninhabitable scattered sites to Walton School substantial rehab development
Scattered Site AMPS	50	Transfer of assistance from vacant and uninhabitable scattered sites to Beury Building substantial rehab development
Scattered Site AMPS	65	Transfer of assistance from vacant and uninhabitable scattered site units to Reynolds School substantial rehab development
<b>Planned Total RAD Converted Units</b>	<b>649</b>	

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

**Table 3A: RAD Conversions Completed or Projected to be Completed by End of FY 2018**

<b>Property Name</b>	<b>RAD Units</b>	<b>Description</b>
2415 N. Broad	88	Transfer of Assistance
St John Neumann Place II	52	Transfer of Assistance
H.E.L.P Philadelphia V	37	Transfer of Assistance
New Courtland at St. Bartholomew	42	Transfer of Assistance
Lehigh Park I and II	49	Transfer of Assistance
Strawberry Mansion	55	Transfer of Assistance
Haddington III	48	Transfer of Assistance
Roberto Clemente House	38	Transfer of Assistance
Southwark Plaza (PA2-121)	470	Conversion of existing AME public housing development
Cantrell Place	40	Transfer of Assistance
Witherspoon Senior Apartments	40	Transfer of Assistance
1315 N. 8th Street	25	Transfer of Assistance
Norris Square Community Alliance Scattered Sites	29	Transfer of Assistance
Norris CNI	74	Choice Neighborhoods RAD Conversion
Plymouth Hall (PA2-079)	53	Conversion of existing public housing development
Blumberg Phase I	51	Transfer of Assistance
Blumberg Phase II-Senior Building	94	Conversion of existing public housing development

Property Name	RAD Units	Description
<b>Total Units</b>	<b>1,285</b>	

### 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 2019. Overall, PHA projects that 779 additional units will be placed under contract in FY 2019. Actual contract/leasing figures may vary based on multiple factors, including contract terminations or suspensions, new and additional projects approved by the PHA Board during the Plan year, HUD RAD processing timetables and other considerations. RAD Developments placed under HAP in FY 2018 - but not scheduled to lease until FY 2019 - are listed in the “Approved Activities” chapter of this Plan in the Unit-Based Leasing and Development Program table.

**Table 4: New Housing Choice Vouchers to be Project-Based in FY 2019**

Property Name	Anticipated # of New Vouchers to be Project-Based	Description of Project
Edison 64	20	HUD-VASH Project Based site for Homeless veterans in North Philadelphia
Francis House	10	New Construction in West Philadelphia for frail seniors
Harlan St	22	New Construction in West Philadelphia for low income families – RAD Transfer of Assistance. Project to consist of 45 units of which 22 will be RAD PBV.
Liddonfield	150	New Construction in Northeast Philadelphia for seniors
Reynolds School	65	Rehabilitation of site in North Philadelphia for Veterans-RAD Transfer of Assistance
Susquehanna Square	37	Rehabilitation of site for low income families in North Philadelphia-RAD Transfer of Assistance
Walton School	44	Rehabilitation of elementary school for low income families in North Philadelphia-RAD Transfer of Assistance
Blumberg Phase III	83	New construction for low-income families in the Sharswood neighborhood-RAD transfer of assistance
27 <sup>th</sup> and Susquehanna	74	New construction for low-income families in the Strawberry Mansion neighborhood – potential RAD transfer of assistance
Norris Apartments Phase III	28	New construction family replacement units as part of Choice Neighborhoods Plan – RAD conversion
Westpark Plaza	65	Rehabilitation and conversion under RAD of existing public housing development
Suffolk Manor	137	Rehabilitation and conversion under RAD of existing public housing development
Cambridge Plaza I	44	Rehabilitation and conversion under RAD of existing public housing development

Anticipated Total New Vouchers to be Project-Based

**779**

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

**4,353**

**3,270**



## Other Planned Changes to Housing Stock

In FY 2019, 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 Assessment of Fair Housing Plan jointly issued by the City and PHA and accepted by HUD in February 2017. These goals emphasize the importance of a balanced approach to fair housing including preservation of existing housing, development of new affordable rental and homeownership housing, investments to improve the quality of life in distressed neighborhoods, and mobility initiatives to support housing in high opportunity areas.

Working in collaboration with the City of Philadelphia, PHA will continue to further the shared goal of creating significant new affordable housing opportunities citywide. Table 5 provides a summary of other housing and neighborhood revitalization activities currently planned by PHA, including initiatives in support of the City of Philadelphia's affordable rental and homeownership goals. Additional initiatives may be added during the Plan year, subject to Board approval and any applicable HUD approvals, which may include acquisitions, housing and/or commercial development and other activities in support of PHA's Strategic Directions Plan. In addition, Appendix E includes PHA's Asset Management Table, which is periodically updated to provide an overview of planned or potential development, disposition, refinancing, conversion and/or homeownership activities at PHA sites.

**Table 5: Other Planned Activities**

Site	Description of Project
Brooklyn Heights	PHA is negotiating the acquisition (PRA) of land in the Mill Creek neighborhood to develop approximately 32 units.
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.
Strawberry Mansion Community Center	PHA plans to identify and acquire property in the Strawberry Mansion neighborhood for a multiservice Community Center.
Falls Ridge	PHA is finalizing plans for a long-term sale or 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 <sup>th</sup> and Susquehanna	PHA intends to consolidate existing PHA properties and Philadelphia Land Bank sites, and enter into a ground lease with a third party developer to build approximately 74 rental units in the Strawberry Mansion neighborhood with potential RAD transfer of assistance.

Site	Description of Project
Sharswood Acquisition	PHA completed the acquisition of privately owned parcels in the Sharswood neighborhood for the redevelopment of the Norman Blumberg development consistent with HUD-approved CNI Transformation Plan.
Sharswood Development	PHA has designated Hunt Development Company as developer for certain off-site parcels in the Sharswood community. PHA is working with Hunt to develop a plan for additional housing development in support of the CNI Transformation Plan goals.
Liddonfield	PHA completed the sale of this former public housing site to New Courtland, the selected developer who plans to build 300 rental units on the site.
2012 Chestnut Street	PHA entered into a development agreement with 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 has entered into a predevelopment agreement with Pennrose Properties to evaluate the redevelopment of Bartram Village. PHA also submitted an application for Choice Neighborhoods Planning grant funds for the Bartram Village and surrounding Kingsessing neighborhood to support the development of a comprehensive Transformation Plan.
Vaux Community Building	PHA has completed the Phase 1 renovations to the building, which serves as a community center and focal point for the Sharswood/Blumberg neighborhood revitalization effort. A neighborhood school operated by Big Picture Philadelphia has leased space in the building and began operations in September 2017. PHA is completing negotiations with additional non-profit partners to lease space to provide health care and other services for low-income residents.
Vacant Lot Disposition	PHA owns approximately 700 vacant lot parcels which are not part of the ACC inventory and which do not have a HUD Declaration of Trust attached to the deed. PHA plans to dispose of the properties for fair market value, to the Land Bank, to a PHA affiliate or alternate means.
2200-50 Turner Street	PHA may enter into a lease or purchase agreement for this existing parking lot facility in anticipation of future development activity.
Strawberry Mansion (RFP)	Potential acquisition of homeownership 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 2019 including projects funded from MTW Block Grant and other sources. 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 in FY 2019**

<b>Project Type</b>	<b>Site Name</b>	<b>Project Description</b>	<b>Total Estimated Budget/Expenditures</b>
Capital Improvements	Abbottsford Homes	Sitework - Playground Replacement	\$ 30,000
Capital Improvements	Arch Homes	504 Site modifications/fair hsg	\$ 5,000
Capital Improvements	College View	Sanitary Upgrades	\$ 900,000
Capital Improvements	Fairhill Apts	Joint Replacement, Fire Protection & Standpipe	\$ 500,000
Capital Improvements	Haddington Homes	Sitework - Playground Replacement	\$ 30,000
Capital Improvements	Harrison Plaza	504Site modifications/fair hsg	\$ 5,000
Capital Improvements	Hill Creek	Tree Removal	\$ 20,000
Capital Improvements	Johnson Homes	504Site modifications/fair hsg	\$ 5,000
Capital Improvements	Johnson Homes	Sitework - Playground Replacement	\$ 70,000
Capital Improvements	Morton Homes	Sitework - Playground Replacement	\$ 80,000
Capital Improvements	Oxford Village	Sitework - Playground Replacement	\$ 25,000
Capital Improvements	Queen Lane Apts	504Site modifications/fair hsg	\$ 5,000
Capital Improvements	Queen Lane Apts	Sitework - Playground Replacement	\$ 500,000
Capital Improvements	Raymond Rosen	504Site modifications/fair hsg	\$ 5,000
Capital Improvements	Raymond Rosen	Sitework - Playground Replacement	\$ 100,000
Capital Improvements	Richard Allen II	504Site modifications/fair hsg	\$ 5,000
Capital Improvements	Scattered Sites 901-910	Sitework - Concrete Repairs	\$ 600,000
Capital Improvements	Spring Garden Apts	504Site modifications/fair hsg	\$ 5,000
Capital Improvements	Spring Garden Apts	Electrical - Transformer Replacement	\$ 200,000
Capital Improvements	Wilson Park	Backwater check valves & sanitary investigation	\$ 125,760
Capital Improvements	Wilson Park	Sitework - Playground Replacement	\$ 140,000
Capital Improvements	Wilson Park - Senior	504Site modifications/fair hsg	\$ 5,000
Modernization	Scattered Sites 901	Scattered Sites - Rehab - Phase 5	\$ 557,800
Modernization	Scattered Sites 902	Scattered Sites - Rehab - Phase 5	\$ 906,461
Modernization	Scattered Sites 903	Scattered Sites - Rehab - Phase 5	\$ 278,100
Modernization	Scattered Sites 904	Scattered Sites - Rehab - Phase 5	\$ 945,287
Modernization	Scattered Sites 905	Scattered Sites - Rehab - Phase 5	\$ 1,108,311
Modernization	Scattered Sites 906	Scattered Sites - Rehab - Phase 5	\$ 354,399
Modernization	Scattered Sites 907	Scattered Sites - Rehab - Phase 5	\$ 1,067,048
Modernization	Scattered Sites 908	Scattered Sites - Rehab - Phase 5	\$ 1,074,010
Modernization	Scattered Sites 909	Scattered Sites - Rehab - Phase 5	\$ 1,052,457
Modernization	Scattered Sites 910	Scattered Sites - Rehab - Phase 5	\$ 594,402

Project Type	Site Name	Project Description	Total Estimated Budget/Expenditures
New Development	Administrative	Warehouse/Maintenance Building	\$ 1,375,000
New Development	Blumberg	Blumberg PH 4 (On-Site) Rental - 83	\$ 33,100,000
New Development	Blumberg	Blumberg PH 5 (Reynolds School)	\$ 25,000,000
New Development	Blumberg	Blumberg PH 9 - (Harland Street) Rental (45 units)	\$ 16,250,000
New Development	Blumberg	Blumberg Supermarket	\$ TBD
New Development	Norris Choice	North Central CNI Phase 3 Replacement / Affordable	\$ 30,000,000
RAD	27th & Susquehanna	27th & Susquehanna - RAD TRANSFER	\$ 20,000,000
RAD	Susquehanna Square	Susquehanna Square - TRANSFER OF ASSISTANCE	\$ 15,600,000
		<b>Total</b>	<b>\$ 152,624,035</b>

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 2019. The listing of proposed projects and estimated budgets is preliminary and subject to change.

**Table 6A: Additional Planned Capital Projects and Estimated Budget**

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Arlene Homes	Heating Upgrades	\$ 150,000
Capital Improvements	Commercial Space	Commercial Space upgrades	\$ 1,000,000
Capital Improvements	Harrison Plaza	Water Penetration	\$ 4,000,000
Capital Improvements	Johnson Homes	Weatherization/Infiltration	\$ 700,000
Capital Improvements	Oxford Village	Sanitary Upgrades	\$ 3,700,000
Capital Improvements	Raymond Rosen	Roof Replacement	\$ 1,175,309
Capital Improvements	Scattered Sites 901-910	Scattered Site Demolition	\$ 2,589,000
Capital Improvements	Scattered Sites 901-910	Heating Upgrades	\$ 400,000
Capital Improvements	Scattered Sites 901-910	Painting	\$ 600,000
Capital Improvements	Scattered Sites 901-910	Sitework - Concrete Repairs	\$ 1,800,000
Capital Improvements	Scattered Sites 901-910	Window Replacement	\$ 400,000
Capital Improvements	Wilson Park	Boiler Repairs	\$ 450,000
ECM	Arlene Homes	Water Efficient Plumbing Fixtures - install	\$ 44,184
ECM	Arlene Homes	Weatherization/Infiltration	\$ 54,741
ECM	BAS SCADA	BAS SCADA Repairs and recommissioning	\$ 900,000
ECM	Bentley Hall	Water Efficient Plumbing Fixtures - install	\$ 132,551
ECM	Bentley Hall	Weatherization/Infiltration	\$ 102,759
ECM	Cassie L Holley	LED Exterior Lights	\$ 35,085
ECM	Cassie L Holley	LED Interior Lights - Apts	\$ 25,528
ECM	Cassie L Holley	LED Interior Lights - Common	\$ 3,754
ECM	Cassie L Holley	Vacancy Sensors - Common	\$ 2,404
ECM	Cassie L Holley	Water Efficient Plumbing Fixtures - install	\$ 99,413
ECM	Cassie L Holley	Roof Insulation	\$ 98,019

Project Type	Site Name	Project Description	Total Estimated Budget
ECM	Cassie L Holley	Weatherization/Infiltration	\$ 37,431
ECM	Cecil B. Moore	Weatherization/Infiltration	\$ 49,158
ECM	Cecil B. Moore	Water Efficient Plumbing Fixtures - install	\$ 68,787
ECM	Cecil B. Moore	Heating Upgrades	\$ 262,000
ECM	Champlost Homes	Water Efficient Plumbing Fixtures - install	\$ 14,561
ECM	Champlost Homes	Increase Combustion Air	\$ 44,499
ECM	College View	Weatherization/Infiltration - Crawl Space	\$ 117,153
ECM	College View	Water Efficient Plumbing Fixtures - install	\$ 74,560
ECM	Emlen Arms	Vacancy Sensors - Common	\$ 16,827
ECM	Emlen Arms	Increase Combustion Air	\$ 52,400
ECM	Fairhill Apts	LED Exterior Lights	\$ 16,127
ECM	Fairhill Apts	LED Interior Lights - Apts	\$ 201,593
ECM	Fairhill Apts	LED Interior Lights - Common	\$ 112,496
ECM	Fairhill Apts	Vacancy Sensors - Lighting - Common	\$ 19,712
ECM	Fairhill Apts	Water Efficient Plumbing Fixtures - install	\$ 910,026
ECM	Gladys B Jacob	LED Exterior Lights	\$ 2,556
ECM	Gladys B Jacob	LED Interior Lights - Apts	\$ 31,954
ECM	Gladys B Jacob	Install Additional Back-Up Power	\$ 144,100
ECM	Gladys B Jacob	Weatherization/Infiltration	\$ 74,720
ECM	Haverford Homes	Water Efficient Plumbing Fixtures - install	\$ 61,206
ECM	Haverford Homes	Increase Combustion Air	\$ 10,369
ECM	Haverford Homes	Weatherization/Infiltration	\$ 31,952
ECM	Hill Creek	LED Interior Lights - Apts	\$ 205,171
ECM	Hill Creek	Weatherization/Infiltration	\$ 121,502
ECM	Holmecrest Homes	LED Exterior Lights	\$ 8,096
ECM	Holmecrest Homes	LED Interior Lights - Apts	\$ 37,527
ECM	Holmecrest Homes	LED Interior Lights - Common	\$ 3,049
ECM	Holmecrest Homes	Vacancy Sensors - Lighting - Common	\$ 962
ECM	Holmecrest Homes	Boiler Replacement	\$ 109,893
ECM	Holmecrest Homes	Heating Upgrades	\$ 786,000
ECM	Holmecrest Homes	Water Efficient Plumbing Fixtures - install	\$ 216,577
ECM	Johnson Homes	Replace basement access metal grades with solid aluminum floor hatch	\$ 772,900
ECM	Johnson Homes	Electrical - Motor Efficiency Upgrades	\$ 58,950
ECM	Johnson Homes	Insulation - Crawl Space	\$ 932,261
ECM	Johnson Homes	Water Efficient Plumbing Fixtures - install	\$ 1,090,830
ECM	Johnson Homes	Increase Combustion Air	\$ 262,000
ECM	Katie B Jackson	Install Additional Back-Up Power	\$ 144,100
ECM	Katie B Jackson	Weatherization/Infiltration	\$ 26,729
ECM	Morton Homes	LED Interior Lights - Apts	\$ 249,433
ECM	Morton Homes	LED Interior Lights - Common	\$ 766
ECM	Morton Homes	Increase Combustion Air	\$ 262,000

Project Type	Site Name	Project Description	Total Estimated Budget
ECM	Morton Homes	Insulation - Pipe	\$ 1,754
ECM	Morton Homes	Weatherization/Infiltration	\$ 468,186
ECM	Oxford Village	LED Interior Lights - Apts	\$ 139,088
ECM	Oxford Village	LED Interior Lights - Common	\$ 11,127
ECM	Oxford Village	Water Efficient Plumbing Fixtures - install	\$ 505,512
ECM	Oxford Village	Increase Combustion Air	\$ 85,973
ECM	Oxford Village	Insulation - Pipe	\$ 18,752
ECM	Queen Lane Apts	LED Exterior Lights	\$ 1,408
ECM	Queen Lane Apts	Water Efficient Plumbing Fixtures - install	\$ 53,638
ECM	Queen Lane Apts	Increase Combustion Air	\$ 8,208
ECM	Queen Lane Apts	Weatherization/Infiltration	\$ 28,643
ECM	Raymond Rosen	Water Efficient Plumbing Fixtures - install	\$ 1,122,120
ECM	Raymond Rosen	Furnace Replacement	\$ 2,892,480
ECM	Raymond Rosen	Increase Combustion Air	\$ 238,479
ECM	Raymond Rosen	Weatherization/Infiltration	\$ 510,676
ECM	Richard Allen II	LED Interior Lights - Apts	\$ 98,555
ECM	Richard Allen II	Water Efficient Plumbing Fixtures - install	\$ 560,326
ECM	Richard Allen II	Increase Combustion Air	\$ 64,804
ECM	Spring Garden Apts	Furnace Replacement	\$ 445,400
ECM	Spring Garden Apts	LED Interior Lights - Apts	\$ 129,621
ECM	Spring Garden Apts	Water Efficient Plumbing Fixtures - install	\$ 510,664
ECM	Spring Garden Apts	Insulation - Pipe	\$ 9,488
ECM	West Park Apts	Aerco Replacement	\$ 589,500
ECM	Whitehall Apts	Water Efficient Plumbing Fixtures - install	\$ 695,424
ECM	Whitehall Apts	Insulation - Pipe	\$ 37,392
ECM	Wilson Park	LED Exterior Lights	\$ 48,118
ECM	Wilson Park	LED Interior Lights - Apts	\$ 536,863
ECM	Wilson Park	LED Interior Lights - Common	\$ 43,750
ECM	Wilson Park	Water Efficient Plumbing Fixtures - install	\$ 1,003,798
ECM	Wilson Park	Heating & Power Upgrades	\$ 733,720
ECM	Wilson Park	Water Heater Replacements	\$ 327,500
ECM	Wilson Park	Aerco Replacement	\$ 327,500
ECM	Wilson Park	Boiler Retube	\$ 589,500
ECM	Wilson Park	Weatherization/Infiltration	\$ 1,407,266
Modernization	Scattered Sites 901-910	Scattered Sites - Rehab	\$ 18,000,000
New Development	54th & Popular	54th & Popular 50 units	\$ 17,500,000
New Development	Blumberg	Blumberg PH 10 Rentals - 150	\$ 60,500,000
New Development	Blumberg	Blumberg PH 6 (On-Site) HO - 68	\$ 24,480,000
New Development	Blumberg	Blumberg PH 7 Homeownership - 25	\$ 10,000,000
New Development	Blumberg	Blumberg PH 11 Homeownership - 75	\$ 30,000,000
New Development	Blumberg	Blumberg PH 12 (110 rental and Homeownership units)	\$ 44,000,000

Project Type	Site Name	Project Description	Total Estimated Budget
New Development	Blumberg	Blumberg PH 13 Homeownership - Various Phases	\$ 30,000,000
New Development	Blumberg	Blumberg PH 14 Rental (50 units)	\$ 18,000,000
New Development	Blumberg	Blumberg PH 8 Rentals - 150	\$ 60,500,000
New Development	Blumberg	Blumberg PH 15 Homeownership - Various Phases	\$ 30,000,000
New Development	Blumberg	Blumberg Ridge Avenue West Commercial (50/mix)	\$ 60,000,000
New Development	Blumberg	Blumberg PH Homeownership - Various Phases	\$ 30,000,000
New Development	Blumberg	Blumberg Recreation Field (HOLD)	\$ 15,000,000
New Development	Brooklyn Heights	Brooklyn Heights	\$ 18,100,000
New Development	Gordon Street extension	Gordon Extension - Phase II (25 units)	\$ 8,750,000
New Development	Market West	5600 Haverford Avenue	\$ 17,500,000
New Development	Millcreek West	Millcreek West	\$ 17,500,000
New Development	Norris Choice	North Central CNI Phase 1 & 5 (30 HO)	\$ 10,750,000
New Development	Norris Choice	North Central CNI Phase 4 ( 5 HO)	\$ 2,000,000
New Development	Norris Choice	North Central CNI Phase 5 (45 Replace.;61 Afford; 22 Mrkt)	\$ 54,000,000
New Development	Strawberry Mansion	Walton School - Senior Housing	\$ 18,000,000
New Development	Strawberry Mansion	Strawberry Mansion Community Center	\$ 6,400,000
New Development	Temple Area	Temple Area	\$ 18,750,000
RAD	Arch/Haddington	Arch/Haddington - RAD CONVERSION	\$ 51,375,000
RAD	Bartram Village	Bartram, Phase 1 - RAD CONVERSION	\$ 96,470,000
RAD	Bartram Village	Bartram, Phase 2 - RAD CONVERSION	\$ 96,064,200
RAD	Cambridge I	Cambridge I - RAD CONVERSION	\$ 6,000,000
RAD	Cambridge II	Cambridge II - RAD CONVERSION	\$ 6,000,000
RAD	Cambridge III	Cambridge III - RAD CONVERSION	\$ 6,600,000
RAD	Fairhill Apts	Fairhill - RAD CONVERSION	\$ 105,600,000
RAD	GGFE Phase I	Greater Grays Ferry (GGFE) Phase I - RAD CONVERSION	\$ 31,585,000
RAD	Harrison Plaza	Harrison - RAD CONVERSION @ \$150k	\$ 44,850,000
RAD	LEB I	Millcreek Lucien E. Blackwell (LEB) I - RAD CONVERSION	\$ 12,000,000
RAD	LEB II	Millcreek Lucien E. Blackwell (LEB) II - RAD CONVERSION	\$ 12,000,000
RAD	Suffolk Manor	Suffolk Manor - RAD CONVERSION	\$ 6,000,000
RAD	West Park Apts	Westpark Apts. - RAD CONVERSION	\$ 130,800,000
RAD	West Park Plaza	Westpark Plaza- RAD CONVERSION @ \$150k	\$ 9,750,000
		<b>TOTAL</b>	<b>\$ 1,275,168,112</b>

## **B. Leasing Information**

- PHA's Public Housing inventory includes units for families, seniors, and people with disabilities located at conventional and scattered site properties. It also includes properties managed by Alternately 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. While PHA is planning to add additional public housing units, the overall size of the public housing inventory continues to decline (and the HCV inventory increases) as units are converted to project-based assistance under RAD.

- 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. PHA utilizes vouchers to support the Unit Based Voucher program, through which PHA provides long-term subsidy contracts with non-profit and other sponsors. In FY 2018, PHA added an additional 50 Mainstream vouchers from the 1260 Housing Development Corporation. Periodically, HUD issues Enhanced Vouchers and Tenant Protection Vouchers (TPV) for PHA to administer. In FY 2018, HUD issued 254 TPVs to PHA for a HUD Multifamily development (Overmont House) and a Moderate Rehab SRO development converting to RAD (Lofts at 2601). 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 2019. 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. The conversion of public housing to project-based assistance under RAD began in FY 2017 and will continue in FY 2019. RAD vouchers are included in the total “Federal MTW Voucher (HCV) Units to be Leased” shown in Table 7. 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 2019**

<b>MTW Households to be Served Through:</b>	<b>Planned Number of Households to be Served</b>	<b>Planned Number of Unit Months Occupied/Leased</b>
Federal MTW Public Housing Units to be Leased	13,099	157,188
Federal MTW Voucher (HCV) Units to be Utilized*	17,544	210,528
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs	0	0
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs	0	0
<b>Total Households Projected to be Served</b>	<b>30,643</b>	<b>367,716</b>

\*Includes 892 RAD vouchers

**Table 7A: Non-MTW Voucher Programs: Planned Number of Households Served at End of FY 2019**

<b>Non-MTW Program to be Served Through:</b>	<b>Planned Number of Households to be Served</b>	<b>Planned Number of Unit Months Occupied/Leased</b>
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Non-MTW Program to be Served Through:	Planned Number of Households to be Served	Planned Number of Unit Months Occupied/Leased
Mainstream	120	1,440
VASH	703	8,436
VASH Project Based	14	168
Moderate Rehab	203	2,436
SRO	296	3,552
<b>Total Households Projected to be Served</b>	<b>1,336</b>	<b>16,032</b>

## Reporting Compliance with Statutory MTW Requirements

PHA is in compliance with all applicable MTW statutory requirements.

## Description of Anticipated Issues Related to Leasing

*Public Housing Program* – RAD conversions and RAD transfer of assistance activities are expected to continue in FY 2019. 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 the Housing Opportunity Program (HOP) in August 2013 to enhance its mobility initiatives. 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 75 clients in FY 2019 to find units in opportunity areas. HOP 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 HCV Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP) as applicable. Administration of site based waiting lists for the Conventional and Scattered Site program areas is managed under the Public Housing Admissions Department to ensure consistent and efficient management of applicants on the various waitlists.

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

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 2019**

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	29,544	Partially Open	No
Federal MTW Public Housing Units *	Site-Based	40,880	Open	Yes
Federal MTW Housing Choice Voucher Program	Community-Wide	13,439	Partially Open	No

*\*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. Under the Unit Based Program, site-based waitlists are managed and maintained by individual owners. PHA approves the site-based waitlists and tenant selection plan for each Unit Based development.

### 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.
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### 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 and issues for FY 2019:

- PHA may update one or more of its waiting lists in FY 2019. 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 and/or HCV Administrative Plan in FY 2019, 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. After the initial waiting list has been established, PHA shall administer its waiting list for the converted project in accordance with the applicable 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 including a review of each development's tenant selection plan.
- 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 detailed in the joint PHA-City Assessment of Fair Housing, PHA will continue to evaluate and update as needed 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

PHA proposes two new MTW Activities for the FY 2019 MTW Annual Plan.

#### ACTIVITY 2019-01: OPENING DOORS TO AFFORDABLE HOMEOWNERSHIP

**Description of MTW Activity:** PHA will utilize MTW Block Grant funding and programmatic flexibility to expand first-time affordable homeownership initiatives to increase housing choice and the number of first time, low-income homebuyers. The program will build on the existing framework and consolidate PHA's existing HUD-approved 5h Homeownership Program, HCV Homeownership Program, other new development homeownership initiatives and homeownership readiness and counseling support under the management of PHA's Homeownership Department. Further, this activity will expand PHA's existing programs to incorporate new types of assistance including lease-purchase and down payment assistance options.

Under the existing 5h program, PHA assists current public housing residents of scattered site units to purchase their own units; however, the program is limited to current residents of the unit, and does not incorporate post-purchase voucher assistance. To date, 182 residents have purchased their scattered site units under 5h. Under the existing HCV Homeownership program, current voucher participants may utilize their voucher assistance to purchase homes and then receive monthly Housing Assistance Payments to support housing costs for up to a fifteen (15) year period. To date, PHA has assisted 585 HCV participants to purchase their first homes.

In addition to 5h and HCV Homeownership, to date, PHA has developed and sold 306 new homeownership units that were developed as part of HOPE VI, mixed finance and other major revitalization initiatives. PHA also has worked with over 1,100 residents to complete homeownership counseling courses in partnership with HUD-approved housing counseling agencies.

The new MTW Opening Doors to Affordable Homeownership Program (ODAHP) will consolidate, streamline and enhance these existing initiatives while modifying eligibility and post-purchase support criteria and adding new financing support mechanisms. Key features of the new program include:

*Eligibility:*

- Open to all existing low-income public housing residents and HCV participants who are in good standing with their lease and program requirements.
- Must be a first time homebuyer.
- Must complete PHA-required homeownership counseling and financial literacy courses.
- Must agree to participate in post-purchase follow-up review on an annual basis for three years from the point of closing. HCV participants who receive monthly subsidy will be exempt from this requirement, although they can access support services through PHA's Homeownership Department.
- PHA will incorporate a preference for current FSS participants in good standing.

### *Program Components*

ODAHP participants will work with PHA's Homeownership Department to review their financial status, credit standing and household goals. As noted above, participants will be required to meet all eligibility requirement including successful completion of approved homeownership counseling and financial literacy courses. Financing options available to program participants will include:

- **Monthly voucher assistance:** Households may receive monthly Housing Assistance Payments assistance for up to 15 years. Generally, this assistance will cover the difference between up to 28% of adjusted household income and the projected monthly homeownership costs, subject to a cap that is equal to PHA's voucher payment standard. PHA's rent simplification policies will be utilized to calculate household adjusted income and tenant monthly payments. Households will be recertified on a biennial basis per PHA's existing policy. Per PHA's MTW policy, assistance will be ended 180 days after a household income rises such that the PHA subsidy equals \$50 or less. Monthly voucher assistance may be used for private market units as well as for PHA scattered site units following sale.
- **Down payment assistance:** In lieu of receiving monthly voucher assistance, ODAHP participants will be eligible for one-time down payment assistance up to a maximum of \$15,000 per household. Participants receiving down payment assistance will not be recertified. However, PHA will record a soft second mortgage on the title with a 20-year recapture period. In the event of a default, PHA will receive notification and attempt to work with the household to develop a financial workout plan to avoid foreclosure. If the default is not cured, PHA will recoup the down payment assistance amount, which will decrease 5% annually over the 20 year term.
- **Soft second mortgage option:** Up to a maximum of \$50,000 per household may be provided as a soft second mortgage, provided that the household is not receiving other PHA homeownership assistance. Participants receiving this assistance will not be recertified. However, PHA will record a soft second mortgage on the title with a 20-year recapture period. In the event of a default, PHA will receive notification and attempt to work with the household to develop a financial workout plan to avoid foreclosure. If the default is not cured, PHA will recoup the soft second mortgage amount, which will decrease 5% annually over the 20 year term.
- **Lease to purchase option:** PHA plans to implement lease to purchase options that can be implemented in private market rentals and scattered sites that are still part of PHA's public housing inventory. A portion of the tenant rent will be escrowed during the lease to purchase period and then applied to the down payment at the time of purchase. Lease to purchase participants will be recertified per PHA's existing policy.

As with the current 5h program, all scattered site units will be eligible for sale to ODAHP participants without requiring additional HUD disposition approval.

For the down payment assistance and soft second programs, PHA has established reasonable maximum limits of \$15,000 and \$50,000. These amounts were determined based on PHA's internal assessment of the level of assistance needed to ensure successful first time

homeownership among current program participants given current Philadelphia housing market conditions. Note, however, that PHA will authorize only the minimum amount needed to close the affordability gap based on individual household circumstances. PHA will calculate the maximum mortgage payment allowed at 35% of adjusted monthly income, and total housing expenses at 38% of adjusted monthly income. The amount of down payment or soft second assistance to be provided by PHA will be calculated by PHA Homeownership Opportunities Department staff based on a complete review of household finances. As part of this review, PHA staff work to maximize household eligibility for any other non-PHA downpayment and/or closing cost assistance programs.

PHA plans to budget approximately \$1.5 million in MTW Block Grant funds yearly to support the program. The number of households served will vary, depending on the mix of financing options utilized by participants. If demand exceeds available budget, PHA will establish a wait list based on date and time of application.

**Statutory Objective:** This initiative will support the MTW statutory objective of increasing housing choice for low-income families and giving incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.

**Anticipated Impact:** The Opening Doors to Affordable Homeownership Program is expected to result in an increase in the number of low-income, first time homebuyers.

**Anticipated Time Line:** PHA plans to implement the program in FY 2019.

**Metrics:** The following are proposed standard HUD MTW metrics applicable to this activity. As this is a new activity, the baseline is zero. Outcomes will be reported in the MTW Annual Report.

<i>HC #6: Increase in Homeownership Opportunities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home as a result of this activity (increase).	0	TBD		
<i>HC #5: Increase in Resident Mobility</i>				
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	TBD		

**Data Source:** PHA will use data collected from its internal software systems to track participant outcomes.

**Authorization Standard:** MTW Agreement Attachment C, (D): The Agency is authorized to establish reasonable low-income homeownership programs, such as a lease-to-own program, that are not limited by the existing public housing homeownership requirements, provided that units can only be sold to current public housing residents and that any disposition of current public housing units must be approved in advance by HUD, which has previously been done as part of the 5h approval process for scattered sites. Any disposition application will be submitted and processed in accordance with this Agreement; and,

MTW Agreement Attachment C, (D)(8)(a) and (b): a)The Agency is authorized to establish reasonable Section 8 homeownership programs that are not limited by the existing Section 8 homeownership requirements; and, b) The Agency is authorized to permit current public housing residents who are on a merged waiting list to obtain a Section 8 homeownership voucher.

MTW Agreement Attachment D, Broader Uses of Funds: Where PHA utilizes MTW funds to act as a mortgager in providing homeownership assistance (through soft second mortgages), the applicable provisions of PIH Notice 2011-45 will apply.

## ACTIVITY 2019-2: SHARSWOOD YOUTH & FAMILY ENRICHMENT SERVICES

**Description of MTW Activity:** PHA plans to utilize MTW Block Grant funding flexibility to support after school programs designed to help improve educational outcomes and high school graduation rates for PHA youth and other low-income youth living in the Sharswood/Blumberg neighborhood of Philadelphia. This activity will also provide partial funding for case management for youth and their families to help overcome barriers to educational success and to access community resources to address family supportive service needs.

As part of the comprehensive neighborhood transformation strategy for the former Blumberg public housing development and the surrounding Sharswood community, PHA will provide \$500 per student per year in MTW Block Grant funds to support after school programming and case management services to be provided in coordination with a newly established neighborhood school serving youth in grades 9-12 which is operated by Big Picture Schools Philadelphia (BPSP) and located in the Vaux Community Building. BPSP works to engage students in learning and internship opportunities to encourage career exploration and progression to higher educations. The Vaux Community Building, a key part of the Choice Neighborhood Transformation Plan, will serve as a focal point and anchor for the revitalized community, with on-site facilities for educational, health care and other supportive services. The plan to establish a neighborhood school and to improve educational outcomes is an integral component of the comprehensive Choice Neighborhoods Transformation Plan for Blumberg-Sharswood that was accepted by the US Department of Housing and Urban Development (HUD) in March 2016.

This MTW activity will provide partial funding of BPSP's after school programs including homework assistance, sports activities, robotics, music production, computer refurbishing and other education-related activities. Partial funding will also be provided for case management support to youth and their families that is provided by BPSP's Resilience Specialist. The Resilience Specialists provide one on one and group counseling to students and their families, with the goal of identifying and removing barriers to educational success and family stability.

PHA shares BPSP's goal of helping PHA and other low-income youth to exceed citywide educational metrics, and to graduate and move onto higher education and meaningful careers. PHA's intention is that the primary beneficiaries of the services provided by BPSP will be members of PHA resident households, including residents of public housing and the Housing Choice Voucher (HCV) program; however, other low-income neighborhood youth may be served.

For the 2018-19 school year, 126 students are enrolled. Enrollment will increase by 126 each year until the school reaches capacity at 504 students.

School Year	Projected Enrollment	MTW Annual Funding
2018-19	126	\$63,000
2019-2020	252	\$126,000
2020-2021	378	\$189,000



2021-2022	504	\$252,000
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**Statutory Objective:** This initiative will support the MTW statutory objective of giving incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.

**Anticipated Impact:** This activity will support improved educational outcomes by PHA youth and other low-income neighborhood youth.

**Anticipated Time Line:** PHA has developed an MOU with the program partner, and will implement and report on activities beginning in FY 2019.

**Metrics:** PHA proposes to utilize the following HUD standard metric, along with additional local metrics identified in consultation with program partner, Big Picture Schools Philadelphia. Outcomes will be reported in the MTW Annual Report.

<i>SS #5: Households Assisted by Services that Increase Self-Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	0	TBD		

**Data Source:** Big Picture Schools Philadelphia will provide detailed information on the metrics identified above. PHA may also utilize other data from its internal software system.

**Authorization Standard:** MTW Agreement Single Fund Flexibility to provide self-sufficiency and supportive services to existing PHA public housing residents and HCV participants. MTW Agreement Attachment D, Broader Uses of Funds, to provide self-sufficiency and supportive services to eligible low-income households that are not otherwise permitted under the Housing Choice Voucher and public housing programs established in Sections 8 and 9 of the US Housing Act of 1937.

## **IV. APPROVED MTW ACTIVITIES**

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

### **A. Implemented Activities**

#### **ACTIVITY 2011-1: PARTNERSHIP PROGRAMS INITIATIVE**

##### **Description/Update**

PHA will continue to utilize MTW authority to expand public housing for special needs and other targeted groups in partnership with non-profit neighborhood groups, universities, state and local government, and other stakeholders. This flexible, services-oriented model allows PHA to leverage PHA and partner resources to provide public housing options and, where appropriate and feasible, related health care, educational, and/or other necessary services to low-income families and individuals. Authorized features of this initiative include, but are not limited to, the following:

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

agencies; program contracts for participants that may include requirements for case management, participation in services, or other requirements; time limits on housing subsidies; modified occupancy standards; availability of stipends; and other components.

In FY 2019, PHA projects that 49 additional public housing units will be developed by PHA's non-profit partner at the New Courtland at Henry Avenue Phase 1 project. The actual number of units developed and the development timetable may vary depending on final financing plans, construction schedules, HUD approval timetables and other factors.

### Approval and Implementation

- Approved FY 2011
- Implemented FY 2012
- Modified FY 2013 to incorporate specific components applicable to the youth aging out of foster care partnership with the Philadelphia Department of Human Services (DHS)

### Hardship

Not applicable.

### Proposed Changes

No changes are proposed that require MTW authority.

### Changes to Metrics

Benchmarks have been updated to reflect anticipated FY 2019 outcomes.

<b>HC #1: Additional Units of Housing Made Available *</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	49 units		
* 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 FY19 require MTW waivers at present other than the use of MTW Block Grant funds				
<b>CE #4: Increase in Resources Leverage – ALL Planned FY 2019 Projects *</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Amount of funds leveraged in dollars (increase).	\$0	\$18,500,000		
* 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 FY19 require MTW waivers at present other than the use of MTW Block Grant funds.				



## **ACTIVITY 2004-1: NEIGHBORHOOD DEVELOPMENT & REVITALIZATION INITIATIVES**

### **Description/Update**

PHA will continue to use MTW authority to substantially increase housing choices for residents and applicants. PHA is continuing to implement an ambitious program of new construction, substantial rehabilitation, and modernization designed to revitalize PHA public housing developments, replace distressed housing lost to demolition and lack of capital funds, and improve Philadelphia's neighborhoods. Public housing development or redevelopment activities, and other new development, directly undertaken by PHA as developer are included under this initiative. To support these redevelopment activities, PHA continues to implement the following MTW components, which also support the Partnership Initiative and other MTW activities:

- Design Standards - PHA continues to implement reasonable and modest design standards for new construction and rehabilitation work that mirror current design trends and the 21st century needs of residents.
- Total Development Cost Limits and Housing Cost Caps - PHA has established and maintains reasonable cost limits for development and redevelopment activities that replace HUD's Total Development Cost (TDC) limits and Housing Cost Caps (HCC).
- Streamlined Mixed-Finance Development Process - PHA is authorized to develop public housing through several financing methods, including the mixed-finance approach, which involves the use of private financing, Housing Choice Vouchers, and public housing development funds.
- MTW Site and Neighborhood Standards - PHA is authorized to implement alternate Site and Neighborhood Standards for its public housing and voucher programs, in lieu of those standards at 24 CFR § 941.202(b)-(d) and 24 CFR 983.57.
- Streamlined Acquisition Process - Subject to the provisions of the MTW Agreement, PHA is authorized to acquire sites without prior HUD approval, provided that the agency certifies that HUD site selection requirements have been met.
- Strategy for Development - PHA has adopted a Development-Asset Management Strategy for Public Housing that takes a comprehensive neighborhood-by-neighborhood and block-by-block approach to redeveloping, consolidating, rehabilitating, demolishing, and acquiring and disposing of scattered site units independently and in partnership with government and other local neighborhood-based organizations.

### **Approval and Implementation**

- Design Standards
  - Approved FY 2004
  - Implemented FY 2004

- Total Development Cost Limits and Housing Cost Caps
  - Approved FY 2004
  - Implemented FY 2004
- Streamlined Mixed-Finance Development Process
  - Approved FY 2004
  - Implemented FY 2004
- MTW Site and Neighborhood Standards
  - Approved FY 2004
  - Implemented FY 2004
- Streamlined Acquisition Process
  - Approved FY 2002
  - Implemented FY 2002
- Strategy for Development
  - Approved FY 2005
  - Implemented FY 2005

## Hardship

Not applicable.

## Proposed Changes

No changes are proposed that require MTW authority. PHA may seek to update its MTW TDC/HCC cost caps, subject to HUD approval.

## Changes to Metrics

New units developed by PHA or its affiliates are included as part of the Unit Based Leasing and Development activity.

CE #1: Agency Cost Savings *				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	TBD	\$0		
*PHA has previously noted that this metric is not 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 2004 (i.e. over 10 years before implementation of HUD standard metrics).				
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		

*\*PHA has previously noted that this metric is not 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 2004 (i.e. over 10 years before implementation of HUD standard metrics).*

**CE #3: Decrease in Error Rate of Task Execution \***

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

*\*PHA has previously noted that this metric is not applicable to this activity; however, its use is required by HUD. PHA does not track error rates associated with the Neighborhood Development and Revitalization Initiative activities listed above.*

**CE #4: Increase in Resources Leveraged**

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

**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 2019		

**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 2015	TBD		

*\*PHA establishes new site based waiting lists 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 the proposed development(s); 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 2019		

## **ACTIVITY 2004-2: SERVICE-ENRICHED HOUSING FOR SENIORS & PEOPLE WITH DISABILITIES**

### **Description/Update**

PHA will continue to collaborate with the Commonwealth of Pennsylvania and other local providers to develop and implement a range of service-enriched housing options for seniors and people with disabilities, including the following ongoing program components:

- Nursing Home Transition – The Nursing Home Transition Initiative (NHTI) is a partnership with the Department of Public Welfare (DPW) that assists persons transitioning out of nursing homes with accessing affordable housing. As part of NHTI, PHA administers seventy-five (75) 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.
- 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.

### **Approval and Implementation**

- Nursing Home Transition
  - Approved FY 2010
  - Implemented FY 2010
- Definition of Elderly
  - Approved FY 2004
  - Implemented FY 2004

### **Hardship**

Not applicable.

### **Proposed Changes**

No changes are proposed that require MTW authority.

### **Changes to Metrics**

Changes in benchmarks have been made to reflect the transition of PHA's Adult Day Care program to a third party provider as noted in the FY 2017 MTW Annual Report. Benchmarks have been updated to reflect anticipated FY 2019 outcomes.



<i><b>HC #5: Increase in Resident Mobility</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0 – Nursing Home Transition (NHT)	75 – Ongoing (NHT)		
<i><b>HC #7: Households Assisted by Services that Increase Housing Choice</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice (increase).	0 – Nursing Home Transition (NHT)	75 – Ongoing (NHT)		

## **ACTIVITY 2004-3: SIMPLIFICATION AND STREAMLINING OF RENT AND RECERTIFICATION PROCESSES FOR PUBLIC HOUSING AND HCV**

### **Description/Update**

PHA will continue to implement 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.

- Two and Three-Year Recertification/Limit on Interims – Public Housing and HCV, including UBV/RAD require recertifications every two years, except for public housing residents choosing ceiling rents who are recertified every three years. Voluntary interim recertifications are restricted to one every six months, except for elderly and disabled households who are exempt from this restriction. PHA will process voluntary interim rent reductions if and when the reduction in income lasts for more than 30 days. In FY 2017, PHA began conducting recertifications every three years for elderly or disabled households on fixed incomes in both the HCV and public housing program.
- Ceiling Rents – PHA has established ceiling rents for its public housing developments, which are periodically updated. PHA tenants will continue to have the option of selecting either a ceiling rent or an income-base rent. PHA uses ceiling rents when calculating rent for mixed families.
- Rent Calculation Method – PHA has established an alternative rent structure for the HCV, including UBV/RAD, and public housing programs to motivate residents to work and accumulate savings. In FY 2017, PHA began allowing households with up to \$50,000 in assets to self-certify asset value and income from the assets. Asset income is excluded when the value of the household's asset is less than \$50,000. Asset income for household assets valued at greater than \$50,000 is calculated by using the market value of the asset times the passbook savings rate. Also in FY 2017, PHA began excluding all full-time student earned income for family members other than the Head, Spouse or Co-Head and PHA discontinued verification of full-time student income as 100% of the income is excluded.
- Payment Standards – PHA has implemented a policy in the HCV program whereby the current payment standard is applied at regular recertification. In FY 2017, 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 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.
- Reasonable Rent
  - PHA has developed and implemented a reasonable rent policy for the HCV program, including UBV/RAD, whereby reasonable rent determinations are completed at initial lease up, upon request for a rent increase, and at other times PHA deems it necessary to conduct a reasonable rent redetermination.

- PHA may implement across-the-board rent increases or rent freezes for properties in the HCV program. When and if an across-the-board rent increase is awarded, PHA will complete a reasonable rent determination at the time of the next annual HQS inspection and apply applicable policies related to reasonable rent when and if the rent is not reasonable.
- Utility Allowances
  - PHA is authorized to implement a revised utility allowance methodology that includes the following components:
    - HCV participants who are responsible for paying gas heat and who are eligible to participate in the PGW Customer Responsibility Program (CRP) have the gas portion of their utility allowances calculated using an alternative methodology. PHA may elect to implement this utility allowance program in public housing where applicable.
    - PHA will periodically, at its discretion, review HCV utility allowance schedules to determine if adjustments are required. Annual updates are not required.
    - Utility allowances may be phased out for residents with incomes at or above 80% of Area Median Income or public housing residents on ceiling rent.
    - PHA will review and modify public housing utility schedules periodically based on an assessment of available HUD funding and the requirements of the MTW Agreement and Plan.
  - PHA is also authorized to expand the utility allowance policy to require public housing and HCV tenants receiving either heat or electric utility allowances to enroll and participate in the PECO Customer Assistance Plan, LIHEAP and any other applicable programs that offer reduced rates, energy usage grants, or other financial incentives to low-income households.
  - For HCV participants only, during an interim recertification PHA will apply the utility allowance in effect on the effective date of the interim recertification; however, families on the Alternate 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 2019, PHA will continue to analyze options to the HUD Small Area Fair Market Rent (SAFMR) regulation that will both promote residential mobility among HCV participants and avoid negative impacts on current and future participants. PHA may propose MTW modifications that address housing market conditions in Philadelphia.

PHA will further expand the utility allowance policy to require public housing and HCV tenants, whose incomes are at or below 150% of the Federal Poverty Level and who receive a utility allowance for water, to enroll and participate in the Philadelphia Water Departments Tiered Assistance Program (TAP). TAP provides customers with significant savings by offering a consistent bill based on their income. PHA will base the water utility allowance for eligible

households on the amount charged under the TAP program. Water charges range from 2% to 3% of gross income.

Also, in FY 2019, PHA will implement a policy for tenant-based voucher units only whereby the HAP contract shall terminate automatically 180 calendar days after the last housing assistance payment to the owner of \$50 or less. In this way, PHA will be able to provide assistance to a greater number of households by freeing up vouchers held by households with minimal assistance. This policy shall not apply to the Unit Based Voucher program.

## **Approval and Implementation**

- Two and Three-Year Recertification/Limit on Interims
  - Approved FY 2004
  - Implemented FY 2004
- Ceiling Rents
  - Approved FY 2004
  - Implemented FY 2004
- Rent Calculation Method
  - Approved FY 2004
  - Implemented FY 2004
  - Modified FY 2017
- Payment Standards
  - Approved FY 2008
  - Implemented FY 2008
- Reasonable Rent
  - Across-the-board Rent Increases
    - Approved FY 2008
    - Implemented FY 2008
  - Streamline Reasonable Rent Determinations
    - Approved FY 2005
    - Implemented FY 2005
- Utility Allowances
  - PGW CRP Program
    - Approved FY 2009
    - Implemented FY 2014
  - PECO Customer Assistance Plan Enrollment
    - Approved FY 2011
    - Not yet implemented

- Interim Recertification Utility Allowance
  - Approved FY 2017
  - Implemented FY 2017

## Hardship

PHA has adopted a hardship policy which considers exceptions to all of PHA's rent and utility allowance 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. Hardship exemption requests must be submitted in writing and explain the nature of the hardship and include any applicable documentation.

## Proposed Changes

No changes are proposed that require additional MTW authority.

## Changes to Metrics

Benchmarks have been updated to reflect anticipated FY 2019 outcomes. PHA continues to note that the below metrics do not accurately reflect the success of this activity as they do not account for unit/population turnover (i.e. households moving out over multiple years). The baselines 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.

<i>CE #1: Agency Cost Savings *</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	\$878,122 (estimate)	\$333,095		
<i>*Includes HCV and PH.</i>				
<i>CE #2: Staff Time Savings *</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	56,110 hours (estimate)	21,284 hours		
<i>*Includes HCV and PH.</i>				
<i>CE #3: Decrease in Error Rate of Task Execution *</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	5%	5%		
<i>*PHA implemented its revised rent calculation method in 2004, and did not have historical data on rent calculation error rates at that time. PHA identified the baseline as part of the FY 16 Annual Report (which already reflects error rate reductions) and then established a benchmark of maintaining this level going forward, i.e. PHA would not anticipate future</i>				

reductions to error rates.

**CE #5: Increase in Agency Rental Revenue – Utility Allowance Policy \***

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	\$606,753	\$606,753		

*\*Represents the savings generated by PHA on behalf of households who receive the CRP UA for gas heat.*

**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). – HCV	\$17,032	\$18,331		
Average earned income of households affected by this policy in dollars (increase). – PH	\$20,749	\$20,749		

*\* 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 14 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?
Increase in Positive Outcomes in Employment Status – Employed (increase).	36% (n=4,725) of work-able households as of 3/31/14	Increase work-able households with employment income to 42% *		
Increase in Positive Outcomes in Employment Status – Unemployed (decrease).	64% (n=8,282) of work-able households as of 3/31/14	Decrease work-able households without employment income to 58%		

*\*Combined PH and HCV. Work-able includes non-elderly, non-disabled households only. The benchmark is contingent on the economy and opportunities available in the City of Philadelphia.*

*\* 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 14 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 #8: Households Transitioned to Self Sufficiency \***

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).*	0 households	295 households		

*\*Combined PH and HCV. 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 is 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.*

## ACTIVITY 2004-4: UNIT-BASED LEASING AND DEVELOPMENT PROGRAM

### Description/Update

Expanding the supply of affordable housing in Philadelphia continues to be PHA's top priority. Under PHA's Unit-Based Leasing and Development Program ("UBV" or the "Unit-Based Program"), PHA negotiates long-term subsidy contracts with for-profit and non-profit private sector housing providers based on property specific agreements. PHA prioritizes the selection of developments which serve underserved populations and/or which incorporate supportive services on-site or nearby. Key features of PHA's UBV program include:

- PHA's Site Selection Standards for the UBV program will comply with the alternate Site and Neighborhood Standards described at Attachment C, Section D (7)(c) to PHA's MTW Agreement.
- The rent to 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 may determine that a shallow 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. The project is currently fully occupied, providing affordable housing and supportive services to eligible veterans. 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 use a site-based waiting list for selection of tenants for a site. For owners using a site-based waiting list, PHA must review and approve the tenant selection plan, and owners must refer families to PHA for eligibility screening.
- A family residing in a UBV unit funded with MTW HCV funds may terminate the lease at any time after the initial term. The family must give advance written notice to the owner in accordance with the lease and provide a copy of such notice to PHA. Once a family terminates the lease, the family will no longer be part of the HCV or UBV program. Pursuant to PHA's MTW authority, PHA does not provide UBV participant families who want to move with tenant-based assistance with a tenant-based HCV voucher, except where required under the RAD program or otherwise offered by PHA as a reasonable accommodation, VAWA transfer or due to HQS failures under certain circumstances.
- PHA is clarifying its lease term policy with respect to transitional housing units under the Unit Based Voucher program. While PHA's standard initial lease term for public housing and HCV is two years, PHA may allow a shorter term for transitional housing units in order to facilitate the movement of families through the housing continuum and to obtain "permanent" housing more rapidly.
- PHA will apply its MTW UBV policy to RAD developments and may project-base 100% of the units in a RAD UBV development.
- PHA is not subject to the requirement for an independent entity to approve AHAP/HAP contract terms, renewals of HAP contracts, rent determinations and inspection of PHA owned units.
- PHA will apply the following rent simplification initiatives to the UBV/RAD program: two and three year recertifications; limit on interim recertifications, alternative rent structure and reasonable rent.
- PHA may utilize local forms which reflect PHA's MTW UBV policies and procedures as an alternative to HUD standard forms. 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.



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

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

The specific details of each UBV agreement will be defined prior to closing and shall be subject to HUD review and approval, where applicable, as part of the mixed-finance transaction closing process.

In FY 2019, PHA may issue requests for proposals, conduct evaluations and recommend additional units and developments for approval by the PHA Board. Additionally, in FY 2019, PHA will continue to enter into unit-based contracts for unit which have been approved for conversion under RAD.

Projects that are projected to be placed under HAP contract in FY 2019 – including RAD conversion and transfer of assistance projects - are included in Table 4. The three tables below provide information on projects that are currently subsidized or scheduled to be under contract through the end of FY 2018. The first table includes MTW Unit Based HAP Contracts. The second table lists MTW Rental Assistance Demonstration HAP Contracts and the third table lists HUD-VASH Project Based HAP Contracts.

### **Approval and Implementation**

- Approved FY 2004
- Implemented FY 2004
- Further modifications approved in FY 2017
- FY 2017 modification to approve a VASH PBV HAP contract for an existing shared housing facility.

### **Hardship**

PHA will provide a tenant-based voucher to a UBV tenant as a result of extended HQS failures. PHA may offer a tenant-based voucher to a UBV tenant who has successfully completed the FSS program and has been deemed eligible for a Homeownership Voucher. In extenuating

circumstances and subject to funding availability, PHA may offer tenant-based assistance according to the hierarchy of UBV transfers, for households requiring:

- Transfers due to Personal Safety/VAWA/Other Emergency;
- Reasonable accommodation transfers.

## Proposed Changes

No changes are proposed that require additional MTW waivers. PHA will implement two changes to the Unit Based Leasing activity: 1) PHA will modify the definition of a “project” to include contiguous and/or non-contiguous scattered site housing units owned by a single owner and covered by a single Housing Assistance Payments contract; and, 2) For such scattered site projects, implement an alternative method to determine rent reasonableness whereby PHA will base the rent reasonableness determination for all units in the project that are within the same submarket area on the rent reasonableness determination made for a single unit of each bedroom size. For example, the rent reasonableness determination for all one bedroom units in the project will be based on the rent reasonableness determination made for a single one-bedroom unit in the project provided that the units are in the same submarket area.

## Changes to Metrics

Benchmarks have been updated to reflect anticipated UBV activity in FY 2019.

<i>HC #1: Additional Units of Housing Made Available *</i>				
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 units	430 units		
<i>*HUD requires this metric track only <u>newly constructed and/or rehabilitated</u> units that were put under HAP Contract during the Plan year.</i>				
<i>HC #5: Increase in Resident Mobility</i>				
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 households	2,474 households		
<i>HC #7: Households Assisted by Services that Increase Housing Choice</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0 households	916 households		

## MTW Unit Based HAP Contracts through End of FY 2018

<b>Development Name</b>	<b>Sponsor</b>	<b>Building Type</b>	<b>Neighborhood Location</b>	<b>Voucher Units Under Contract Update</b>	<b>Target Population</b>	<b>Supportive Services</b>
46 <sup>th</sup> 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
4050 Apartments	People's Emergency Center	Low Rise apartments	West Philadelphia	20	Homeless artists	yes
5317 S 15 <sup>th</sup> St	Columbus Property Management	Low rise apartments and row homes	North Philadelphia	1	mental health/chemical dependency	yes
7 <sup>th</sup> 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 Management Associates LP	Low rise apartments	West Philadelphia	30	families/very low income	no
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	Bethesda Project	Low rise	South	20	homeless	yes

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
Bainbridge	Inc.	apartments	Philadelphia			
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
Blumberg Phase I	Philadelphia Housing Authority	row homes	North Philadelphia	6	families/very low income	no
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
Centennial Village	Community Ventures	Low Rise apartments	West Philadelphia	23	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
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
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	Scattered row	Logan	3	women with	yes

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
	Dignity & Fairness	homes	(Northwest Philadelphia)		children (domestic abuse)	
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
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

<b>Development Name</b>	<b>Sponsor</b>	<b>Building Type</b>	<b>Neighborhood Location</b>	<b>Voucher Units Under Contract Update</b>	<b>Target Population</b>	<b>Supportive Services</b>
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	35	homeless/chemical dependency	yes
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 II	HACE	Low rise apartments	North Philadelphia	25	families/self sufficiency	yes

<b>Development Name</b>	<b>Sponsor</b>	<b>Building Type</b>	<b>Neighborhood Location</b>	<b>Voucher Units Under Contract Update</b>	<b>Target Population</b>	<b>Supportive Services</b>
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
Lindley Court	Presby's Inspired Life	Low rise apartments	North Philadelphia	11	Seniors	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 Manor I	Mt. Vernon LP	Low rise apartments	West Philadelphia	15	families/very low income	no
Mt. Vernon Manor II	Mt. Vernon LP	Low rise apartments	West Philadelphia	15	families/very low income	no
New Courtland at Allegheny	New Courtland	Low rise apartments	North Philadelphia	40	Seniors	yes
New Courtland Apts at Cliveden	New Courtland	High rise apartments	Germantown	32	seniors	yes
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
Penrose	Citizens Acting Together Can Help, Inc.	Low rise apartments	South Philadelphia	10	homeless	yes

<b>Development Name</b>	<b>Sponsor</b>	<b>Building Type</b>	<b>Neighborhood Location</b>	<b>Voucher Units Under Contract Update</b>	<b>Target Population</b>	<b>Supportive Services</b>
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	Low rise	West	9	Homeless	yes



Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
	Center	apartments	Philadelphia		families	
Spruce St	Columbus Property Management	Low rise apartments and row homes	West Philadelphia	3	mental health/chemical dependency	yes
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	20	mental health/chemical dependency	yes
Tillmon Villanueva	Women's Community Revitalization Project	Row homes	North Philadelphia	38	families/very low income	yes
Tioga Family Center	Gaudenzia	Row Homes	North Philadelphia	24	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
<b>SUB-TOTAL</b>				<b>2225</b>		

### MTW Rental Assistance Demonstration (RAD) HAP Contracts through End of FY 2018

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
1315 N 8 <sup>th</sup> St	Project HOME	Low Rise	North Philadelphia	25	Homeless youth	yes
2415 N Broad St	Project HOME	Low Rise	North Philadelphia	88	Homeless individuals	yes
Blumberg Phase I	Philadelphia Housing Authority	Row homes	North Philadelphia	51	Low income families	no
Blumberg Senior	Philadelphia Housing Authority	High Rise	North Philadelphia	94	Seniors	yes
Beury Building	North Philly Works Inc	High Rise	North Philadelphia	50	Seniors/disabled	no
Cantrell Place	Presby's Inspired Life	Low Rise apartments	South Philadelphia	40	Seniors	yes
Casas En La	Norris Square Civic	Low Rise	North	29	Families/very	no

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
Plaza	Association	apartments	Philadelphia		low income	
Courtyard at Riverview (RAD Conversion)	Michaels Org	High Rise Apartments/ Row homes	South Philadelphia	470	Seniors/low income families	no
Haddington III	Mission First	Row homes	West Philadelphia	48	families/very low income	yes
HELP V	HELP USA	Low rise apartments	North Philadelphia	37	Homeless veterans	yes
Lehigh Park I&II	HACE	Low rise apartments	North Philadelphia	49	families/self sufficiency	yes
New Courtland at St. Barts	New Courtland	Low rise apartments	Northeast Philadelphia	42	Seniors	yes
Norris Homes Phase II	Philadelphia Housing Authority	Low rise apartments and row homes	North Philadelphia	74	families/very low income	no
Plymouth Hall	Philadelphia Housing Authority	Low rise apartments	North Philadelphia	53	Seniors	no
Roberto Clemente	Nueva Esperanza	Row homes	North Philadelphia	38	Low income families	yes
Strawberry Mansion	Philadelphia Housing Authority	Low rise apartments and row homes	North Philadelphia	55	families/very low income	no
St John Neumann	Archdiocese of Philadelphia	Low rise apartments	South Philadelphia	52	Seniors	no
Witherspoon	Presby's Inspired Life	Low Rise apartments	Southwest Philadelphia	40	Seniors	yes
<b>SUB-TOTAL</b>				<b>1,335</b>		

### HUD-VASH HAP Contracts through End of FY 2018

Development Name	Sponsor	Building Type	Neighborhood Location	Voucher Units Under Contract Update	Target Population	Supportive Services
Hancock Manor	Impact Services	Low Rise apartments	North Philadelphia	14	Homeless Veterans	yes
<b>SUB-TOTAL</b>				<b>14</b>		

**Total Units under HAP Contract FY 2018: 3,574**

## **ACTIVITY 2005-2: STREAMLINE THE ADMISSIONS AND TRANSFER PROCESS**

### **Description/Update**

PHA will continue to implement 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.
- 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 initial lease term has been completed.
- Public Housing Waiting List - Once a family is housed in public housing, the family will be removed from all other scattered site and conventional 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.

### **Approval and Implementation**

- MTW Transfers
  - Approved FY 2005
  - Implemented FY 2005
- HCV Waiting List
  - Approved FY 2012
  - Implemented FY 2012
- Public Housing Waiting List
  - Approved FY 2012
  - Implemented FY 2012

### **Hardship**

Not applicable.

### **Proposed Changes**

No changes are proposed that require MTW authority.

## Changes to Metrics

Benchmarks have been updated to reflect anticipated activity in FY 2019.

<b>HC #3: Decrease in Wait List Time – MTW Transfers</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average applicant time on wait list in months (decrease).	PH – 14 years in FY 2015  HCV – 4.5 years in FY 2015	PH < 1 year  HCV < 1 year		
<b>HC #5: Increase in Resident Mobility – MTW Transfers *</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	30 (estimate)		
*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				
<b>CE #1: Agency Cost Savings – MTW Transfers *</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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.				
<b>CE #2: Staff Time Savings – HCV and Public Housing Waiting Lists *</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	TBD	TBD		
*PHA has previously indicated that PHA does not believe these metrics are applicable to this activity. However, HUD has required their 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.				

## **ACTIVITY 2005-3: HCV PROGRAM EFFICIENCIES**

### **Description/Update**

PHA continues to implement additional efficiencies in the HCV Program designed to simplify processing and streamline administrative processes. This activity includes:

- Restriction on Elective Moves –Families are permitted to move within PHA's jurisdiction after the initial term of assisted occupancy and at the time of regular recertification.
- Criteria for Portability Moves – PHA has established criteria for all port out moves. The criteria 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.
- Development of Local Forms - PHA will prepare local forms which reflect PHA's MTW policies and procedures.

### **Approval and Implementation**

- Restriction on Elective Moves
  - Approved FY 2008
  - Implemented FY 2008
- Criteria for Portability Moves
  - Approved FY 2013
  - Implemented FY 2013
- Development of Local Forms
  - Approved FY 2017
  - Implemented FY 2017

### **Hardship**

Not applicable. This is not a rent reform activity.

### **Proposed Changes**

No changes are proposed that require MTW authority.

### **Changes to Metrics**

No changes have been made to metrics.

<b>CE #1: Agency Cost Savings *</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Restriction on Elective Moves: Total cost of task in dollars (decrease).	\$25,259	\$39,125		
Criteria for Portability Moves: Total cost of task in dollars (decrease).	\$8,451	\$9,390		
*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.				
<b>CE #2: Staff Time Savings *</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Restriction on Elective Moves: Total time to complete the task in staff hours (decrease).	1,614 hours (based on 1,291 moves in FY 14)	2,500 hours		
Criteria for Portability Moves: Total time to complete the task in staff hours (decrease).	540 hours (based on FY 12 port activity)	264 hours		
*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.				

## **ACTIVITY 2016-1: SECOND CHANCE INITIATIVE**

### **Description/Update**

PHA will continue to utilize its MTW authority to support implementation of the Second Chance Housing Choice Voucher Pilot Program. The policy permits the provision of 10 tenant-based vouchers for active participants in good standing with two partner agencies – the Eastern District Federal Court Supervision to Aid Reentry (STAR) Program and the Mayor’s Office of Reintegration Services (RISE) program. The STAR Program works in conjunction with Federal Probation and Parole, to offer returning citizens an opportunity to reduce their parole period by one year through participation in the Re-Entry Program. Each participant signs a contract with their parole officer to transition the oversight of their parole to the two federal Judges that administer the STAR program. The STAR program collaborates with the local RISE program to provide counseling, education, job training and job placement services. In the 2017 Annual Plan, PHA indicated that placements in public housing units may be offered to Second Chance participants in good standing at PHA’s option.

Housing assistance is available to the participants for a period of up to two years, at which point the objective is for participants to transition off the program to other affordable housing. However, PHA may allow Second Chance participants to transition to the HCV or public housing program to continue their tenancy.

In FY 2018, PHA entered into a new partnership with the Pennsylvania First Judicial Court’s MENTOR program. This pilot initiative will allow 20 qualified returning citizens who are working with the MENTOR program to move in with existing PHA public housing households, provided that the PHA household is in good standing and is willing to add a MENTOR program participant to the lease. This will help to re-unite families, prevent homelessness and, hopefully, interrupt the cycle of recidivism.

### **Approval and Implementation**

- Approved FY 2016
- Implemented FY 2016
- Modified FY 2018

### **Hardship**

Not applicable.

### **Proposed Changes**

No changes are proposed that require MTW authority.

### **Changes to Metrics**

No changes have been made to metrics.

<b>CE #4: Increase in Resources Leveraged *</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Amount of funds leveraged in dollars (increase).	\$0	Up to \$10,000		
<i>*Participation is not mandatory and is based on the needs of the individual. Leveraged resources reflect activity in the STAR and RISE programs only.</i>				
<b>HC #5: Increase in Resident Mobility *</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	30		
<i>*10 represent the STAR and RISE program and the remaining 20 reflect the First Judicial Court reentry program</i>				
<b>SS #1: Increase in Household Income</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase).	\$18,200 average earned income of participants	\$18,200		
<b>SS #3: Increase in Positive Outcomes in Employment Status *</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Employed Full-Time*	10 participants	10		
	100% of participants	100%		
Enrolled in a Job Training Program	0 participants	5		
	0% of participants	50%		
Enrolled in an Education Program	0 participants	5		
	0% of participants	50%		
<i>*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.</i>				
<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease).	0	0		
<b>SS #5: Households Assisted by Services that Increase Self-Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	0	10		



**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).	\$430 upon implementation (2 participants)	\$439		
<i>* Represents STAR and RISE program participants only.</i>				

**SS #7: Increase in Agency Rental Revenue \***

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase).	\$439	\$440		
<i>*PHA does not have any rental revenue as all participants are in the HCV program. Total Tenant Payment is the metric. Represents STAR and RISE program participants only.</i>				

**SS #8: Households Transitioned to Self Sufficiency \***

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	0	0		
<i>*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.</i>				

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

### **MTW Activity 2014-1: Flexible Subsidy Initiative**

**Description/Update:** The Flexible Subsidy Initiative provides PHA with the flexibility, subject to HUD approval, to establish operating subsidy levels for newly constructed public housing units which blend MTW Block Grant funds (HAP and Operating Fund). This activity was approved by HUD in FY2014. PHA has not utilized this flexibility to date; however, it may be utilized, subject to HUD approval, in future transactions.

**Timeline for Implementation:** PHA will implement this activity if and when PHA needs MTW flexibility to supplement the current public housing operating subsidy levels, subject to prior HUD approval.

**B. Activities on Hold**

Not applicable.

### **C. 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.

<b>Activity</b>	<b>Plan Year</b>	<b>Close Out Year</b>	<b>Reason for Close Out</b>
Assisted Living	FY 2009	FY 2011	PHA discontinued this activity prior to its implementation based on a determination that sufficient funding was not available from state, federal and other required sources.
Home Care Services	FY 2009	FY 2011	PHA discontinued this activity prior to its implementation based on a determination that services can be more efficiently delivered through third-party partners.
Scattered Site Income Tiering	FY 2011	FY 2011	PHA discontinued this activity prior to its implementation based on decisions made as part of the scattered site asset repositioning initiative including disposition and auction of vacant and obsolete properties.
HCV Time Limit	FY 2004	FY 2012	PHA discontinued this activity due to economic conditions which limited the availability of jobs for residents.
HCV HQS Enforcement	FY 2004	FY 2012	PHA discontinued this policy based on a decision to establish uniform HQS enforcement policies for both MTW and Non-MTW vouchers.
Public Housing Service Order Policy	FY 2004	FY 2012	PHA discontinued this policy after discussions with the HUD Field Office concerning the need to expedite service order response times.
Tenant Responsibility Training	FY 2004	FY 2013	PHA determined that this activity does not require MTW flexibility to implement.
Blueprint	FY 2004	FY 2013	PHA continues to implement the Blueprint Program; however, a determination was made that the activity does not require MTW flexibility.
Transitional Housing Facilities	FY 2007	FY 2013	PHA determined that comparable activities are authorized under Partnership Initiative.
LIFE Program	FY 2007	FY 2013	PHA determined that this activity does not require MTW programmatic waivers or Block Grant funding.
Community Service Policy	FY 2011	FY 2013	PHA determined that this activity does not require MTW flexibility.
Expanding Use of LIHTC	FY 2011	FY 2013	PHA determined that the proposed activities were covered under Partnership and Unit-Based Leasing/Development Initiatives.
Family Economic Development Action	FY 2004	FY 2014	PHA discontinued this activity along with discontinuation of HCV time limits as they were

Activity	Plan Year	Close Out Year	Reason for Close Out
Plan/Tenant Responsibility Training			interrelated activities. No additional statutory exceptions outside of the current MTW flexibilities were considered.
Comprehensive Resident Self Sufficiency Services	FY 2005	FY 2014	PHA continues to provide comprehensive resident self-sufficiency services utilizing MTW Block Grant funds. However, MTW programmatic waivers are not required. These activities are now referenced in Chapter V under the Single Fund Flexibility section.
90 Day Voucher Reissuance Policy	FY 2005	FY 2014	PHA discontinued this policy based on an assessment that it would not contribute to PHA's utilization goals.
Accessible Unit Retrofitting and Development	FY 2010	FY 2014	PHA has completed the accessible unit retrofitting under Attachment E of the MTW Agreement. PHA will continue to develop accessible units as part of its revitalization programs; however, this activity does not require specific MTW waivers
Moving to Work Family Agreement Addendum	FY 2004	FY 2016	PHA elected not to utilize this Agreement and instead provides a Family Responsibilities form to each household at each regular recertification.
\$20 Minimum Threshold for Utility Allowance Reimbursements	FY 2009	FY 2016	PHA elected not to establish a minimum threshold of \$20 for payment of utility allowance payments.
Adult Day Care	FY 2011	FY 2017	PHA transitioned the program to a qualified third party provider, and does not provide MTW funding or utilize MTW waivers to support the activity.

## V. MTW SOURCES AND USES OF FUNDING

### A. Estimated Sources and Uses of MTW Funding for Fiscal Year 2019

Tables 9 and 10 below provide estimated sources and uses of MTW funds for FY 2019. 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 2019 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 2019**

<b>SOURCES</b>		
<b>FDS Line Item</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
70500 (70300+70400)	Total Tenant Revenue	\$ 26,667,612
70600	HUD PHA Operating Grants*	\$ 314,503,064
70610	Capital Grants	\$ 41,257,006
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$ 550,000
71100+72000	Interest Income	\$ 419,584
71600	Gain or Loss on Sale of Capital Assets	\$ 0
71200+71300+71310+71400+71500	Other Income	\$ 0
<b>70000</b>	<b>Total Revenue</b>	<b>\$ 383,397,266</b>

\* 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 \$107,596,558 and HCV HAP revenue is estimated at \$206,906,506.

**Table 10: Estimated Uses of MTW Funding for FY 2019**

<b>USES</b>		
<b>FDS Line Item</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$ 42,041,560
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	\$ 18,368,571
93500+93700	Labor	\$ 33,663,287
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$ 12,965,153
95000 (95100+95200+95300+95500)	Total Protective Services	\$ 7,594,048
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$ 9,576,543
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$ 49,552,175
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	\$ 164,173,029
97400	Depreciation Expense	\$ 0
97500+97600+97700+97800 *	All Other Expenses	\$ 41,879,770
<b>90000</b>	<b>Total Expenses</b>	<b>\$ 383,397,266</b>

*\*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 2019 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 2019 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 2019**

Program	Description	Target Population	Funding Source	Residents Served
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
Afterschool	On site programs which provide: (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 to support appropriate nutrition, and provide best practice fellowship to support aging in place.	Residents 62 and over	HUD Grant	20
Community Partners	Occupational Skills training in career areas with reasonable growth potential.	Residents 18 to 55	MTW	100 enrolled
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	2,500
Early Childhood Education Partnerships	Pre-School Partnerships to ensure 3 year olds are enrolled into area Head Start programs	Children 3 to 5	US Dept. of HHS	100
Financial Literacy	Credit and money management to enable residents to purchase homes.	Residents 18 to 55	MTW	150 enrolled



Program	Description	Target Population	Funding Source	Residents Served
FSS	Assessment of individual and family needs, followed by referrals and tracking.	Residents 18 to 55	HUD Grant	300
Health & Wellness Programs	With Every Heartbeat There is Life, with a tobacco component to improve nutrition, exercise	Residents 18 to 55	MTW	75
Home Ownership	Homeownership counseling including 5H, HCV, and Section 32 programs.	Residents 18 to 55	MTW	50
Jobs Plus Pilot Program	Place-based employment program to increase earnings and employment of working-age residents	Residents 18 to 62	HUD Grant	300
PhillySEEDS Scholarship	Competitive scholarship awards based on academic achievement.	Youth/Adults 18 to 55	Section 3 Vendors	55 residents to receive scholarships
ROSS Service Coordination	Assessment of individual and family needs, followed by referrals and tracking.	Residents 18 to 55	HUD Grant	200
ROSS SOAR	Assist PHA residents in applying for FASFA for financial assistance for college	Youth/Young Adults ages 15-20	HUD Grant	120
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	15
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	130
Smoke Free Housing	Provide smoke free cessation programs, including educational awareness workshops and other smoking cessation resources to help residents quit smoking	All	MTW, Philadelphia Department of Public Health, American Heart Association, Nursing Consortium	50 attendees
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, Partners, MTW	50

### C. Local Asset Management Plan

Is the PHA allocating costs within statute?

	or	No
Yes	or	

Is the PHA implementing a local asset management plan (LAMP)?

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. No changes are proposed to the LAMP for FY 2019. A copy of the current LAMP is found in Appendix D.

## **VI. ADMINISTRATIVE**

### **A. Resolution**

A Resolution approving the FY 2019 MTW Annual Plan and the MTW Plan Certification of Compliance will be adopted by the PHA Board of Commissioners at the December 21, 2017 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 2019 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 10, 2017 through December 11, 2017. A public hearing was held on November 29, 2017 at 12 South 23<sup>rd</sup> Street, an accessible facility. Eight persons attended in addition to PHA staff. PHA also conducted a meeting with resident leadership to discuss proposed Plan contents and provide additional opportunities for resident input. Prior to finalizing the Plan, PHA considered the comments received during the public review process.

### **C. Evaluations**

PHA most recent impact analysis of its rent simplification efforts (see Appendix H) is attached. 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 2019 Moving to Work Annual Plan**  
**Rental Assistance Demonstration Significant Amendment**

The Philadelphia Housing Authority (PHA) is incorporating this Rental Assistance Demonstration (RAD) Significant Amendment into its Fiscal Year 2019 Moving to Work (MTW) Annual Plan as required by the US Department of Housing and Urban Development (HUD). The amendment provides information on PHA's planned activities under the Rental Assistance Demonstration (RAD) program. Pursuant to this amendment, PHA will convert 186 vacant, non-viable public housing units located at various scattered site locations in Philadelphia to project-based assistance at four (4) 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 will provide a thirty-day comment period from November 10, 2017 to December 11, 2017, and conduct a Public Hearing on November 29, 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. The PHA Board of Commissioners will conduct a vote on the RAD Significant Amendment at a public meeting in December 2017 as part of the approval for the FY 2019 MTW Annual Plan.

### **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 186 vacant, non-viable 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 four (4) 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 \$569,728 based on Federal FY2017 funding levels. Over a five year period, the estimated Capital Fund reduction is approximately \$2,848,640 based on Federal FY2017 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 vacant, non-viable 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 #** PA002000909  
**Conversion Type (PBV or PBRA)** PBV  
**Capital Fund Grant (FY17)** \$66,802.78

**Pre-Conversion Total Units** 22  
**Pre-Conversion Unit Type** Scattered Site  
**Pre-Conversion Bedroom Size**

	<b># of Units</b>
0 BR	0
1 BR	1
2 BR	2
3 BR	16
4 BR	0
5 BR	1
6 BR	2

**Post-Conversion Total Units** 40  
**Post-Conversion RAD Units** 22  
**Post-Conversion Unit Type** PBV  
**Post- Conversion Development Name and Address** Harlan Street  
 Various parcels on blocks bounded by 21st and 22nd Street and Sharswood and Master Street

**Post - Conversion Sponsor** Michaels Development Company  
**Project Description** Harlan Street is a forty (40) unit, general occupancy, affordable housing development that will be constructed in the Sharswood/Blumberg neighborhood of Philadelphia. Twenty-two (22) of the units will be under HUD's Rental Assistance Demonstration Program ("RAD"). The project will be developed on various parcels controlled by Philadelphia Housing Authority and Michaels Development Company on blocks bounded by 21st and 22nd Street and Sharswood and Master Street. The total development will be about 46,000 square feet and include twenty-eight (28) two-bedroom units and twelve (12) three-bedroom apartment homes as well as approximately 2,200 square feet of community space to include a manager's office, computer laboratory, fitness center, and maintenance space. The design will be a mixture of 2-story townhomes and 2 and 3-story stacked flat apartments.

### Post-Conversion Bedroom Size

	<b>Total # of Units</b>	<b># of RAD Units</b>
0 BR	0	0
1 BR	0	0
2 BR	28	15
3 BR	12	7
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 #** PA002000902, PA002000904, PA002000905, PA002000907, PA002000908, PA002000909  
**Conversion Type (PBV or PBRA)** PBV  
**Capital Fund Grant (FY17)** \$112,569.75

**Pre-Conversion Total Units** 37  
**Pre-Conversion Unit Type** Scattered Sites  
**Pre-Conversion Bedroom Size**

	PA002000902	PA002000904	PA002000905	PA002000907	PA002000908	PA002000909
	# of Units	# of Units	# of Units	# of Units	# of Units	# of Units
0 BR	0	0	0	0	0	0
1 BR	0	0	0	0	0	0
2 BR	0	0	0	0	3	1
3 BR	3	8	1	2	6	2
4 BR	0	3	2	0	1	0
5 BR	0	0	0	2	0	0
6 BR	0	0	0	3	0	0

**Post-Conversion Total Units** 37  
**Post-Conversion RAD Units** 37  
**Post-Conversion Unit Type** PBV  
**Post- Conversion Development Name and Address** Susquehanna Square  
 2100 blocks of North 15th and 16th Streets and 1601 Diamond  
**Post - Conversion Sponsor** Community Ventures  
**Project Description** The proposed Susquehanna Square is a thirty-seven (37) unit, scattered site, new-construction housing development for families. The project will help to complete the selected blocks of N. 15th and N. 16th Streets as well as a vacant lot on 1601 Diamond Street, in order to stabilize the area and add density back to the neighborhood. Susquehanna Square will be located adjacent to the Duckrey Elementary School in North Central Philadelphia and immediately northwest of Temple University in an area that has seen significant private investment and rising rents. The project is comprised of two newly constructed three-story walk-up buildings on the 2100 blocks of North 15th and 16th Streets, which will house thirty-five apartments, and a three-story duplex at 1601 Diamond Street.

**Post-Conversion Bedroom Size**

	Total # of Units	# of RAD Units
0 BR	0	0
1 BR	17	17
2 BR	14	14
3 BR	3	3
4 BR	3	3
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 #	PA002000901, PA002000902, PA002000903		
Conversion Type (PBV or PBRA)	PBV		
Capital Fund Grant (FY17)	\$135,344.42		
Pre-Conversion Total Units	44		
Pre-Conversion Unit Type	Scattered Sites		
Pre-Conversion Bedroom Size	PA002000901	PA002000902	PA002000903
	# of Units	# of Units	# of Units
0 BR	0	0	0
1 BR	0	0	0
2 BR	0	1	1
3 BR	8	13	9
4 BR	2	1	1
5 BR	0	8	0
6 BR	0	0	0
Post-Conversion Total Units	44		
Post-Conversion RAD Units	44		
Post-Conversion Unit Type	PBV		
Post- Conversion Development Name and Address	Walton School 2601 North 28th Street		
Post - Conversion Sponsor	Philadelphia Housing Authority Development Corporation (PHADC)		
Project Description	The development will consist of the rehabilitation of the former Walton elementary school into 44 units of senior housing. All units will be under HUD’s Rental Assistance Demonstration Program (“RAD”). All 44 units will be leased to seniors earning 60% of the area median income (“AMI”) or less and 10% of the units will be reserved for seniors earning 20% of the AMI or less. In addition, the development will exceed federal, state, and local accessibility requirements.		
Post-Conversion Bedroom Size	Total # of Units	# of RAD Units	
0 BR	1	1	
1 BR	40	40	
2 BR	3	3	
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 #** PA002000901, PA002000902, PA002000903, PA002000904, PA002000905, PA002000906, PA002000907, PA002000908, PA002000909, PA002000910

**Conversion Type (PBV or PBRA)** PBV  
**Capital Fund Grant (FY17)** \$255,010.85

**Pre-Conversion Total Units** 83  
**Pre-Conversion Unit Type** Scattered Sites  
**Pre-Conversion** PA002000901 PA002000902 PA002000903 PA002000904 PA002000905  
**Bedroom Size**

	# of Units	# of Units	# of Units	# of Units	# of Units	
0 BR	0	0	0	0	0	
1 BR	0	0	0	0	0	
2 BR	1	0	0	0	0	
3 BR	8	5	6	2	2	
4 BR	2	0	3	1	1	
5 BR	0	0	0	2	3	
6 BR	0	1	0	0	1	
	PA002000906	PA002000907	PA002000908	PA002000909	PA002000910	
	# of Units	# of Units	# of Units	# of Units	# of Units	
0 BR	0	0	0	0	0	0
1 BR	1	0	0	0	0	0
2 BR	3	2	2	3	0	0
3 BR	7	0	7	2	2	2
4 BR	4	1	0	4	1	1
5 BR	2	1	0	1	1	1
6 BR	0	0	0	1	0	0

**Post-Conversion Total Units** 83  
**Post-Conversion RAD Units** 83  
**Post-Conversion Unit Type** PBV  
**Post- Conversion Development Name and Address** Blumberg Phase III  
 Blumberg On-Site  
**Post - Conversion Sponsor** Philadelphia Housing Authority Development Corporation (PHADC)  
**Project Description** The development will consist of 83 new construction rental units spread across a mix of townhomes and multi-unit walk-up buildings. All 83 units will be leased to families and individuals earning 60% of the area median income ("AMI") or less and 11% of the units will be reserved for families or individuals earning 20% of the AMI or less. The development will serve as an example of high quality, sustainable design. It will be modular wood frame construction, and will include sustainable design elements guided by two green rating programs: Enterprise Green Communities and Energy Star Certified Homes. The modular manufacturing process will also significantly reduce the amount of construction waste and energy use. In addition, the development will exceed federal, state, and local accessibility requirements.

## RAD Significant Amendment Attachment 1

### Post-Conversion Bedroom Size

	Total # of Units	# of RAD Units
0 BR	0	0
1 BR	11	11
2 BR	36	36
3 BR	32	32
4 BR	4	4
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

### **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.<sup>32</sup> 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

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<sup>32</sup> 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.<sup>33</sup>

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:

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<sup>33</sup> 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 TTP<sup>34</sup>

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

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<sup>34</sup> 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.<sup>35</sup> 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

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<sup>35</sup> 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),<sup>36</sup> an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
  - i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
  - 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

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<sup>36</sup> § 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.<sup>37</sup> In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all

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<sup>37</sup> 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.<sup>38</sup>

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<sup>38</sup> 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).<sup>39</sup>

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

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<sup>39</sup> 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.



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

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<b>Special Attention of:</b>	<b>Notice</b>	H 2016-17 PIH 2016-17 (HA)
Public Housing Agencies		
Public Housing Hub Office Directors		
Public Housing Program Center Directors	<b>Issued:</b>	November 10, 2016
Multifamily HUB Directors		
Multifamily Program Center Directors	<b>Effective:</b>	November 10, 2016
Regional and Field Office Directors		
Regional Administrators	<b>Expires:</b>	This Notice remains in effect until amended, superseded, or rescinded
Performance Based Contract Administrators		
RAD Transaction Managers		
Regional Relocation Specialists	<b>Supplements:</b>	PIH Notice 2012-32 (HA) REV-2
	<b>Supersedes:</b>	H 2014-09/PIH 2014-17

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**SUBJECT:** Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions.<sup>1</sup>

**SECTION 1. Purpose, Applicability and Major Provisions of this Notice**

**1.1. Purpose**

This notice (Notice) provides PHAs,<sup>2</sup> 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

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<sup>1</sup> 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.

<sup>2</sup> 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.<sup>3</sup>

The RAD program was established as a tool for preserving and improving low-income housing stock. RAD is intended to facilitate reinvestment in or redevelopment of the long-term-affordable stock of HUD-assisted housing properties. RAD also provides mobility benefits for assisted residents of converted properties through the choice mobility option, allowing these households to access tenant-based Housing Choice Vouchers. In some cases, RAD can be a tool for transfer of rental assistance from distressed or poorly selected sites to new sites in high opportunity areas. In all cases, the objective is to better serve low-income residents and the broader community in complying with fair housing, other civil rights, and relocation laws.

This Notice provides PHAs and Project Owners with guidance relating to planning and implementing public housing (First Component) RAD conversions in a manner consistent with existing fair housing and other civil rights requirements, including, but not limited to, those associated with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, Titles II and III of the Americans with Disabilities Act, the Architectural Barriers Act of 1968, and their implementing regulations. Section 4 of this Notice summarizes key provisions of existing law applicable to RAD transactions.

To further compliance with these existing requirements, PIH 2012-32 (HA) REV-2, issued June 15, 2015 (the “RAD Notice”) established that specific PHA decisions and activities planned to be part of a First Component RAD conversion must be reviewed by HUD prior to implementation (the “front-end” fair housing and civil rights reviews). Through a front-end review of the enumerated PHA decisions, HUD seeks to assist PHAs and Project Owners in meeting their fair housing, other civil rights, and relocation obligations. Section 5 of this Notice explains the situations in which HUD is requiring front-end fair housing, other civil rights, and relocation reviews, details the procedures for HUD’s front-end review and the type of information that must be submitted for these reviews, and the timeframes for these reviews.

Finally, in Sections 6 and 7 this Notice provides PHAs and Project Owners with guidance regarding RAD program and other statutory and regulatory relocation assistance requirements when planning for or implementing resident moves as a result of a conversion of a public housing project under RAD. This guidance includes reiterated and new requirements, the corresponding required reviews, and explanation of the interaction between RAD relocation procedures and certain existing public housing requirements. PHAs and Project Owners implementing RAD transactions may be subject to (a) the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA),

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<sup>3</sup> 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.<sup>4</sup>

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

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<sup>4</sup> 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.<sup>5</sup> 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.<sup>6</sup> 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-

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<sup>5</sup> 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.

<sup>6</sup> 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](mailto: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.

## SECTION 2. Table of Contents

The contents of this Notice are divided into the following parts:

SECTION 1. Purpose, Applicability and Major Provisions of this Notice .....	1
1.1. Purpose.....	1
1.2. PHA and Project Owner Responsibilities .....	3
1.3. Applicability .....	4
1.4. Explanation of Major Provisions .....	5
1.5. Request for Public Comment .....	6
1.6. Paperwork Reduction Act .....	7
SECTION 2. Table of Contents .....	8
SECTION 3. Background .....	10
3.1. RAD Authority.....	10
3.2. Definitions.....	10
3.3. Applicable Legal Authorities .....	10
3.4. Further Information.....	11
SECTION 4. Generally Applicable Fair Housing and Civil Rights Requirements Relevant Throughout the RAD Conversion Process.....	11
SECTION 5. Application of Key Fair Housing and Civil Rights Requirements to RAD Transactions .....	17
5.1. RAD Eligibility Review.....	17
5.2. PHA's Proposed Site Selection and Certification.....	18
5.3. RAD Front-End Civil Rights Transaction Review .....	20
A) Activities Subject to Front-End Civil Rights Review .....	20
B) Fair Housing, Civil Rights, and Relocation Checklist .....	22
C) Timing of Front-End Review Submissions .....	23
D) Completion of HUD's Front-End Review.....	23
5.4. Front-End Civil Rights Review for RAD Transactions Involving New Construction ..	24
A) Conditions Triggering Review .....	24
B) Analysis of Areas of Minority Concentration .....	25
C) The Sufficient Comparable Opportunities Exception .....	26
D) The Overriding Housing Needs Exception .....	30
5.5. Front-End Civil Rights Review for RAD Transactions Involving Transfer of Assistance .....	32
A) Applicable Standards.....	32
B) Analysis of Transfers of Assistance .....	33
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 .....	34
A) Review of Reductions in the Number of Units, Reductions or Increases in the Number of UFAS Accessible Units or Changes in Bedroom Distribution .....	34
B) Review of Changes in Occupancy Type .....	36
5.7. Other Front-End Civil Rights Review for RAD Transactions .....	36
A) Conversions of Assistance in Which the Construction Schedule Indicates that Relocation is Likely to Exceed 12 Months. ....	36

B)	Conversions of Assistance Involving New Construction or Substantial Alteration, as those terms are defined by Section 504. ....	36
C)	Remedial Agreements and Orders.....	37
5.8.	Affirmative Fair Housing Marketing Plan (AFHMP) Requirements for Projects Converting to PBRA Assistance.....	37
SECTION 6. RELOCATION REQUIREMENTS .....		38
6.1.	Planning .....	39
6.2.	Resident Right to Return.....	41
6.3.	Admissions and Continued Occupancy Requirements .....	43
6.4.	Types of Moves and Relocation .....	43
A)	Moves within the same building or complex of buildings .....	43
B)	Temporary relocation lasting one year or less.....	44
C)	Temporary relocation initially expected to last one year or less, but which extends beyond one year .....	44
D)	Temporary relocation anticipated to last more than one year .....	44
E)	Permanent moves in connection with a transfer of assistance .....	45
F)	Voluntary permanent relocation .....	46
6.5.	Initiation of Negotiations (ION) Date.....	46
6.6.	Resident Relocation Notification (Notices) .....	46
A)	RAD Information Notice.....	47
B)	General Information Notice (49 C.F.R. § 24.203(a)).....	48
C)	Notice of Intent to Acquire (49 C.F.R. § 24.203(d)).....	49
D)	RAD Notice of Relocation .....	49
E)	URA Notice of Relocation Eligibility – for residents whose temporary relocation exceeds one year (49 C.F.R. § 24.203(b)).....	52
F)	Notification of Return to the Covered Project.....	53
6.7.	Relocation Advisory Services.....	53
6.8.	Initiation of Relocation .....	54
6.9.	Records and Documentation; Resident Log .....	54
6.10.	Alternative Housing Options .....	56
A)	Requirements for Any Offer of Alternative Housing Options .....	56
B)	Assisted Housing Options as Alternatives .....	57
C)	Monetary Elements Associated With Alternative Housing Options.....	58
D)	Disclosure and Agreement to Alternative Housing Options .....	58
6.11.	Lump Sum Payments .....	60
SECTION 7. APPLICABILITY OF HCV AND PUBLIC HOUSING REQUIREMENTS .....		60
7.1.	HCV Waiting List Administration Unrelated to the RAD Transaction.....	60
7.2.	HCV Waiting List Administration Related to the RAD Transaction .....	61
7.3.	Public Housing Transfers Unrelated to the RAD Transaction.....	61
7.4.	Resident Initiated Public Housing Transfers Related to the RAD Transaction .....	62
7.5.	Public Housing as a Temporary Relocation Resource.....	62
7.6.	Terminations (Including Evictions) and End of Participation Unrelated to the RAD Transaction .....	63
7.7.	Right-Sizing .....	63

## **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.<sup>7</sup> Pre-conversion projects whose assistance is converting from public housing to Section 8 under RAD are referred to in the RAD Notice and in this Notice as “Converting Projects.” Post-conversion projects are referred to in the RAD Notice and this Notice as “Covered Projects.”

### **3.3. Applicable Legal Authorities**

Appendix I to this Notice identifies key legal authorities with respect to fair housing, civil rights, and resident relocation. Part 2 of Appendix I provides greater detail regarding federal accessibility requirements set forth in three of the legal authorities described in Appendix I,

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<sup>7</sup> 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.<sup>8</sup> 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](mailto: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

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<sup>8</sup> 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.<sup>9</sup> 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.<sup>10</sup> As described further below, the Fair Housing Act prohibits discrimination in housing<sup>11</sup> 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.<sup>12</sup> In addition, all programs or activities receiving Federal financial assistance are subject to Title VI of the Civil Rights Act of 1964 forbidding discrimination on the basis of race, color, and national origin<sup>13</sup> 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.<sup>14</sup> 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.<sup>15</sup> 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

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<sup>9</sup> See 24 C.F.R. § 5.105.

<sup>10</sup> 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.

<sup>11</sup> See 42 U.S.C. §§ 3601 *et seq.*, and HUD regulations in 24 C.F.R. part 100

<sup>12</sup> 42 U.S.C. § 3608(d) and (e).

<sup>13</sup> See 42 U.S.C. §§ 2000d *et seq.*, and HUD regulations in 24 C.F.R. part 1.

<sup>14</sup> See 29 U.S.C. §§ 701 *et seq.*, and HUD regulations in 24 C.F.R. part 8.

<sup>15</sup> 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.<sup>16</sup> 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.<sup>17</sup>

- 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.<sup>18</sup> 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.<sup>19</sup> 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.<sup>20</sup> 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.<sup>21</sup> Finally, the Fair Housing Act prohibits discriminatory site selection, including perpetuation of segregation in transfers of assistance and new construction.
- Meaningful Access for Persons with Limited English Proficiency (LEP):** The PHA or Project Owner is required to take reasonable steps to ensure (a) they provide meaningful access to programs and activities for persons who have a limited ability to read, speak, or understand English; (b) any person with LEP who will be temporarily relocated or

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<sup>16</sup> 24 C.F.R. § 5.150 *et seq.*

<sup>17</sup> See 24 C.F.R. § 5.150 *et seq.* and 24 C.F.R. §§ 91.225, 91.325, or 91.425.

<sup>18</sup> See 24 C.F.R. § 1.4(b)(3).

<sup>19</sup> See 24 C.F.R. § 1.4(b)(6).

<sup>20</sup> See 24 C.F.R. § 8.4(b)(5).

<sup>21</sup> 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.<sup>22</sup>

- **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.<sup>23</sup> 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.<sup>24</sup>

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<sup>22</sup> 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](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq#q26).

<sup>23</sup> 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.

<sup>24</sup> 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.<sup>25</sup> PHAs and Project Owners should also be aware that state or local laws, regulations, and codes may contain greater accessibility requirements. This Notice provides, in Appendix I, Part 2, an overview of accessibility requirements under existing law. The information in Appendix I, Part 2 is intended to assist with the PHA's or Project Owner's compliance with accessibility requirements. PHAs and Project Owners must review Appendix I, Part 2 early-on in planning for the RAD transaction. PHAs and Project Owners may determine that it is most efficient to address accessibility matters early in the project planning. In addition, PHAs and Project Owners must evaluate, throughout the transaction and based on the facts of their situation, which requirements are applicable in which situations to ensure they appropriately address accessibility requirements. PHAs and Project Owners are responsible for ensuring that the architectural drawings and construction comply with the PHA's and Project Owner's obligations and all Federal civil rights requirements, including accessibility requirements under the Fair Housing Act, Section 504, and the ADA.

Accessibility requirements also apply during all stages of a RAD transaction, including during relocation. Existing information (e.g., resident characteristics forms, including identification of the need for accessible unit features; records of approved reasonable accommodations; and records of the presence of accessible unit features) and the residents themselves should be consulted throughout the process of developing and implementing a RAD conversion. Related activities include, but are not limited to:

- Identifying and maintaining existing and pending reasonable accommodations, including the need for larger units to accommodate live-in aides or special equipment;
- Determining what direct services may be needed as a reasonable accommodation (e.g., packing, moving, identification of temporary housing);
- Identifying accessible unit features and assuring that temporary or permanent replacement housing contains comparable features;
- Budgeting appropriately to ensure that reasonable accommodations are addressed.

For more information about compliance with accessibility requirements, the PHA or Project Owner should refer to appropriate notices concerning civil rights requirements and may contact HUD's Office of Fair Housing and Equal Opportunity in either the Washington, D.C. or applicable field offices for more specific guidance. For additional, non-exhaustive guidance on providing relocation assistance to persons with disabilities, see Exhibit 3-1 in HUD Handbook 1378.

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<sup>25</sup> 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.<sup>26</sup> 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.<sup>27</sup>
- Physical Changes to Dwelling Units, Public and Common Use Areas and Other Facilities for Accessibility:** Under the Fair Housing Act, the PHA or Project Owner may be required to permit reasonable modifications. A reasonable modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. Reasonable modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. A request for a reasonable modification may be made at any time during the tenancy. When relocating an individual with a disability who has such modifications in their dwelling unit or public and common use areas because of the individual's disability, regardless of who made them, the PHA or Project Owner has an obligation to provide and pay for such modification in the new dwelling. When considering requests by individuals with disabilities for structural changes to units or public and common use areas, PHAs and Project Owners should take particular note that they may be required to make and pay for such structural modifications as reasonable

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<sup>26</sup> 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>.

<sup>27</sup> *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).<sup>28</sup> 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.<sup>29</sup> 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."<sup>30</sup> 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.<sup>31</sup>

The PHA must also certify that, in conducting its review of site selection for the proposed project, the PHA completed a review with respect to accessibility for persons with disabilities and that the proposed site is consistent with applicable accessibility standards under the Fair Housing Act, Section 504, and the ADA. The site and neighborhood standards for PBV and PBRA require the site to be "suitable from the standpoint of facilitating and furthering full compliance with" the Fair Housing Act and require the site to meet the Section 504 site selection

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<sup>28</sup> See the provisions of Section 1.6.A.4 of the RAD Notice.

<sup>29</sup> 42 U.S.C. § 1437f(bb).

<sup>30</sup> 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).

<sup>31</sup> 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).<sup>32</sup> 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.<sup>33</sup> 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.<sup>34</sup>

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<sup>32</sup> See 24 C.F.R. § 983.57(b)(2) (PBV conversions); *see also*, Appendix III (a) of the RAD Notice (PBRA conversions).

<sup>33</sup> See 28 C.F.R. § 35.130(b)(4).

<sup>34</sup> In conducting its review prior to certification, and in preparing for the certification, PHAs and Project Owners may find it useful to consult with their local or regional FHEO office, the United States Access Board, local or state

While all PHAs must certify their compliance with applicable site selection requirements as described in this Section, some RAD transactions will also be subject to a front-end review of the site selection. For transactions involving activities that present site selection issues of greater complexity, as described in Sections 5.3 through 5.5 below, front-end review will allow HUD's Office of Fair Housing and Equal Opportunity (FHEO) to assist the PHA to consider relevant laws and regulations while completing its site selection review and certification.

### **5.3. RAD Front-End Civil Rights Transaction Review**

Fair Housing Act and other civil rights issues may arise throughout a RAD transaction. Under the Fair Housing Act, an assessment of site suitability includes an analysis of the impact that the siting of the project would have on patterns of segregation for protected classes. The Fair Housing Act is of particular importance when a RAD proposal concerns site selection for new construction or reconfiguration of housing on the original public housing site – for example, the unit size distribution (e.g., conversion of larger bedroom size units to one-bedroom units, which may have an adverse impact on housing opportunities for families with children) or a reduction in the number or distribution of accessible units (which may have an adverse impact on housing opportunities for persons with disabilities). RAD conversions involving new construction must also comply with the Fair Housing Act's accessibility requirements.

Compliance with all applicable fair housing and civil rights requirements is the responsibility of both the PHA and the Project Owner. However, to assist with compliance, HUD's Office of Fair Housing and Equal Opportunity (FHEO) will conduct a front-end civil rights review of project proposals containing activities identified as particularly at risk of violating applicable fair housing and civil rights laws. The activities that must be submitted for front-end civil rights review are listed in Section 5.3(A), below.

#### *A) Activities Subject to Front-End Civil Rights Review*

All RAD conversions that include one or more of the activities listed below (Sections 5.3(A)(1) through 5.3(A)(9)) are subject to a front-end review for compliance with certain civil rights and fair housing requirements. The specific items that HUD will review in the front-end review will depend on which activities are involved in the specific transaction. A RAD conversion may not include one of the activities below without prior written approval from HUD. All Financing Plans must include evidence that the PHA has secured written approval from HUD for any of the following activities that are included in its RAD conversion:

- (1) Conversions of assistance involving new construction, whether on a new site or on a current site, in an area of minority concentration. Front-end review of this activity shall be pursuant to Section 5.4(B), below and, in addition, the PHA shall

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architectural access board or other accessibility authority for information on accessibility standards. Other sources of information on accessibility requirements may include protection and advocacy organizations or independent living centers. In addition, the non-HUD resources may provide advice on how to assess accessibility needs and formulate physical accessibility strategies.

certify in its Annual Plan compliance with site and neighborhood standards applicable to new construction as described in Section 5.2.

- (2) Transfers of assistance where all or a portion of the Converting Project's assistance is transferred to a new site(s) (either new construction or to an existing project) as part of the subject transaction. Front-end review of this activity shall be pursuant to Section 5.5(B), below and, in addition, the PHA shall certify in its Annual Plan compliance with site and neighborhood standards applicable to existing housing as described in Section 5.2.
- (3) Conversions of assistance where the total number of units in the Covered Project is less than the original number of units in the Converting Project (this includes de minimis reductions). Front-end review of this activity shall be pursuant to Section 5.6.
- (4) Conversions of assistance where the Covered Project's unit configuration is different from the unit configuration of the Converting Project. Front-end review of this activity shall be pursuant to Section 5.6.
- (5) Conversions involving a change in occupancy, where the Covered Project serves a different population from the one served by the Converting Project (e.g., when a Converting Project serves families but the Covered Project is subject to an elderly preference or introduction of restrictions or preferences based on age or disability that will change the occupancy of the property). Front-end review of this activity shall be pursuant to Section 5.6.
- (6) Conversions of assistance in which the construction schedule indicates that relocation is likely to exceed 12 months. Front-end review of this activity shall be pursuant to Section 5.7(A).
- (7) Conversions of assistance involving new construction or substantial alteration,<sup>35</sup> 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).

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<sup>35</sup> 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.<sup>36</sup> 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

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<sup>36</sup> The Checklist is available at [www.hud.gov/rad](http://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](http://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.<sup>37</sup>

*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

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<sup>37</sup> 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.<sup>38</sup>

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,

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<sup>38</sup> 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.<sup>39</sup>
- (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

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<sup>39</sup> 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](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.<sup>40</sup> 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.<sup>41</sup> 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,

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<sup>40</sup> For further explanation, see, e.g., *King v. Harris*, 464 F.Supp.827, 839-41 (E.D.N.Y. 1979).

<sup>41</sup> 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.<sup>42</sup>

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.”<sup>43</sup>

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.”<sup>44</sup> 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.”<sup>45</sup> 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.<sup>46</sup>
- “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.”<sup>47</sup> 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.”<sup>48</sup> To facilitate HUD’s consideration of this factor, a PHA should provide the name and census tracts where these racially integrated neighborhoods are located. In general, HUD will consider a neighborhood racially integrated if the neighborhood does not have a high concentration of persons of a particular race or ethnicity when compared to the housing market area in which the neighborhood is located.

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<sup>42</sup> See 24 C.F.R. § 983.57(e)(3)(iv) and Appendix III of the RAD Notice, paragraph (e)(1)(A).

<sup>43</sup> 24 C.F.R. § 983.57(e)(3)(iii); *see also* Appendix III of the RAD Notice, paragraph (e)(1).

<sup>44</sup> 24 C.F.R. § 983.57(e)(3)(v); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B).

<sup>45</sup> 24 C.F.R. § 983.57(e)(3)(v)(A) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(i).

<sup>46</sup> 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.

<sup>47</sup> 24 C.F.R. § 983.57(e)(3)(v)(B) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(ii).

<sup>48</sup> 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.”<sup>49</sup> 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.”<sup>50</sup> 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).<sup>51</sup> 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.”<sup>52</sup> To facilitate HUD’s consideration of this factor, a PHA should describe the opportunities that have been made available, the location of those opportunities, and the number of minority families that have benefitted from the program in recent years. Such programs could include choice mobility strategies, acquisition strategies to acquire and add to the PHA’s portfolio existing apartments in high opportunity areas and transfers of assistance to high opportunity areas.

HUD may consider evidence based on a reliable housing market analysis in evaluating the foregoing factors, along with other factors relevant to housing choice. In the event HUD

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<sup>49</sup> 24 C.F.R. § 983.57(e)(3)(v)(D); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(iv).

<sup>50</sup> 24 C.F.R. § 983.57(e)(3)(v)(E); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(v).

<sup>51</sup> 24 C.F.R. § 983.57(e)(3)(v)(F); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(vi).

<sup>52</sup> 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.<sup>53</sup> 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.<sup>54</sup> 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

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<sup>53</sup> 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.

<sup>54</sup> For example, if the PHA proposes to build 25 RAD units, 20 non-RAD LIHTC units and 15 unrestricted units on-site, such a plan could be acceptable if paired with creation of 15 RAD units at one site and 10 RAD units plus 20 non-RAD LIHTC units at a second site. The 15 unrestricted units in the minority concentrated area are not part of the analysis as they are not affordable units.



minority concentration is highly likely to occur and the PHA must contractually agree with HUD to create such units. Evidence that the transfer is highly likely to occur must include:

- The project name and property address of the site of the similarly-affordable units to be created,
- The census tract and data to confirm that it is not in an area of minority concentration,
- Evidence of site control,
- Evidence of zoning to permit construction of the similarly-affordable units if the affordable units are to be created through new construction,
- A reasonable and feasible sources and uses statement for the transaction, and
- Evidence of financing commitments exceeding 90% of the necessary sources to complete the transaction. Evidence of financing commitments must include an LIHTC allocation if the use of LIHTCs is projected.

*D) The Overriding Housing Needs Exception*

As noted in Section 5.4(A), the second exception under which the site and neighborhood standards permit new construction in areas of minority concentration is if the project is necessary to meet overriding housing needs that cannot be met in that housing market area. The new construction site selection standards under RAD<sup>55</sup> 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”).”<sup>56</sup>

(1) Establishing that a Site is an Integral Part of an Overall Local Strategy for the Preservation or Restoration of the Immediate Neighborhood

To establish that a site is an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood, a PHA must document that the locality has a demonstrated commitment to revitalization that includes or is in addition to the RAD conversion, as demonstrated by the following:

- i. The site is located in a defined geographic area that is the subject of an official, currently operational and realistically achievable plan for the improvement or revitalization of the immediate neighborhood (which plan may include areas beyond the immediate neighborhood); and
- ii. The Covered Project conforms to, and the site is integral to, the goals, strategies, and objectives of the improvement or revitalization plan.

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<sup>55</sup> 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.

<sup>56</sup> 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.<sup>57</sup>
- 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

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<sup>57</sup> 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.<sup>58</sup> 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

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<sup>58</sup> 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.<sup>59</sup> 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.<sup>60</sup> For purposes of this analysis, HUD will examine the minority concentration of:
  - (a) the census tract of the original public housing site compared to the census tract of the proposed site; and
  - (b) an area comprised of the census tract of the original public housing site together with all adjacent census tracts compared to an area comprised of the census tract of the proposed site together with all adjacent census tracts.
- (4) Whether the site selection has the purpose or effect of:
  - (a) Excluding individuals from, denying them the benefits of, or subjecting them to discrimination under the RAD program or the applicable rental assistance program;
  - (b) Excluding qualified individuals with disabilities from or denying them the benefit of the RAD program or the applicable rental assistance program, or otherwise subjecting them to discrimination;
  - (c) Defeating or substantially impairing the accomplishment of the objectives of the RAD program or the applicable rental assistance program with respect to qualified individuals with disabilities; and

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<sup>59</sup> 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).

<sup>60</sup> 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.<sup>61</sup> 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 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.<sup>62</sup>

##### *A) Review of Reductions in the Number of Units, Reductions or Increases in the Number of UFAS Accessible Units or Changes in Bedroom Distribution*

This Section describes the considerations relevant to a front-end review of reductions in units, changes in the number of UFAS accessible units or changes in bedroom distribution. Such changes must not be the result of an intentional effort to discriminate against members of a protected class. For example, reductions or changes, including reductions in UFAS accessible units or which would impede residents with disabilities from having live-in aides, that intended to exclude persons with disabilities would be unlawful discrimination because of a disability.

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<sup>61</sup> See Sections 1.4.A.4 and 1.4.A.10 of the RAD Notice.

<sup>62</sup> 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.<sup>63</sup> 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

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<sup>63</sup> 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.<sup>64</sup> 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.<sup>65</sup> They are also a means to carry out the mandate of Section 808(e)(5) of the Fair Housing Act that HUD administer its programs and activities in a manner to affirmatively further fair housing. These requirements mandate that PHAs or Project Owners identify groups that are least likely to apply for upcoming housing opportunities and to implement special marketing and outreach activities to ensure that these groups are aware of these opportunities.

The AFHMP must be submitted to HUD with the Financing Plan. A separate AFHMP is required for each distinct PBRA HAP contract. The PHA must submit an AFHMP even if the project has an existing waiting list and is not accepting new applicants. The PHA or Project Owner should consult the instructions in the form HUD 935.2A and HUD's Implementing Affirmative Fair Housing Marketing Requirements Handbook (HUD Handbook 8025.1) for guidance on completing the AFHMP and carrying out an affirmative marketing program. The Handbook provides a detailed resource on the content of the AFHMP, which includes marketing activities, residency preferences, and staff training.

When submitting an AFHMP for HUD approval, the PHA or Project Owner must ensure that the occupancy designation and any residency preferences are consistent with the PHA Plan or Significant Amendment to the PHA Plan, that such designation and preferences are consistent with the Checklist submitted to HUD and that the AFHMP includes affirmative marketing

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<sup>64</sup> 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.

<sup>65</sup> *See* 24 C.F.R. § 200.610.



activities that are consistent with its occupancy designation and the populations identified as least likely to apply. Any subsequent changes to occupancy designation or residency preferences shall be proposed, submitted and reviewed in accordance with standard PBRA requirements. If a PHA or Project Owner plans to adopt any local or residency preferences, the Project Owner must submit its Tenant Selection Plan along with the AFHMP (see HUD Handbook 4350.3, page 4-4).

The Multifamily Housing Office of Asset Management and Portfolio Oversight and the Office of Fair Housing and Equal Opportunity (“FHEO”) review the AFHMP. FHEO issues HUD’s official letter of approval or disapproval. Disapproval letters will specify the reason a plan was rejected and the revisions required. The PHA or Project Owner must make the required changes and resubmit a corrected plan to HUD for approval.

The PBRA contract becomes effective on the first day of a month, following closing. Approval of the AFHMP is not a condition to closing of the RAD conversion. When the project is preparing to accept applications, it must follow its approved AFHMP to ensure that groups least likely to apply are aware of the housing opportunities. The Project Owner is responsible for ensuring that the AFHMP is in place throughout the life of any FHA mortgage or PBRA contract. The Project Owner may not market or lease any unit not occupied by a household exercising its right to remain in or return to the Covered Project prior to approval of the AFHMP. Marketing or leasing includes the solicitation, distribution or acceptance of applications or development of a waiting list.

## **SECTION 6. RELOCATION REQUIREMENTS**

In some cases, as explained in this Section, the activities associated with the RAD transaction may require the relocation of residents. In the event of acquisition, demolition, construction or rehabilitation activities performed in connection with a RAD conversion, the PHA and/or Project Owner<sup>66</sup> 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

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<sup>66</sup> 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.<sup>67</sup>

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.<sup>68</sup>

## **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.<sup>69</sup> All parts of the Checklist must be submitted to HUD prior to submission of the Financing Plan. The Checklist will allow HUD to assist the PHA to comply, and to evaluate the PHA's compliance, with relocation requirements, including civil rights requirements related to relocation.

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<sup>67</sup> 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.

<sup>68</sup> 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."

<sup>69</sup> 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"> <li>• Determine potential need for relocation in connection with proposed conversion plans.</li> <li>• Meet with residents to discuss proposed conversion plans, communicate right to return, and solicit feedback.</li> <li>• Provide the <i>RAD Information Notice</i> (RIN) to residents as described in Section 6.6(A) of this Notice.</li> </ul>
2. After submission of RAD application	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Survey residents to inform relocation planning and relocation process.</li> <li>• Develop a relocation plan (see Appendix II for recommended content).</li> <li>• Prepare Significant Amendment to PHA Plan and engage with the Resident Advisory Board, residents and the public regarding Plan amendment.<sup>70</sup></li> </ul>
3. Following issuance of the CHAP, or earlier if warranted	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
4. While preparing Financing Plan	<ul style="list-style-type: none"> <li>• Discuss the outlines of the conversion plans and their impact on relocation with the HUD transaction manager.</li> <li>• Refine the plan for relocation and integrate the construction schedule into the relocation strategy; seek to minimize off-site or disruptive relocation activities.</li> <li>• Identify relocation housing options .</li> <li>• Budget for relocation expenses and for compliance with accessibility requirements.</li> <li>• Submit the Checklist and, where applicable, the relocation plan.</li> <li>• If the conversion involves acquisition, at the discretion of the Project Owner issue Notice of Intent to Acquire (NOIA).</li> <li>• If a NOIA is issued, at the discretion of the Project Owner provide residents with appropriate relocation notices as</li> </ul>

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<sup>70</sup> 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"> <li>• Meet with residents to describe approved conversion plans and discuss required relocation.</li> <li>• 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)).</li> <li>• 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.</li> <li>• Resident relocation may begin following the effective date of the RCC, subject to applicable notice requirements.</li> </ul>
6. Post-Closing	<ul style="list-style-type: none"> <li>• Ongoing implementation of relocation</li> <li>• Notify the residents regarding return to the Covered Project as described in Section 6.6(F) of this Notice</li> <li>• Implementation of the residents’ right to return</li> </ul>

## 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.<sup>71</sup> 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;<sup>72</sup>

<sup>71</sup> 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.

<sup>72</sup> 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;<sup>73</sup> 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.<sup>74</sup>

If the resident who would be precluded from returning to the Covered Project objects to such plans, the PHA must alter the project plans to accommodate the resident's right to return to the Covered Project.

If the resident who would be precluded from returning to the Covered Project prefers to voluntarily and permanently relocate rather than object to the project plans, the PHA must secure informed, written consent to a voluntary permanent relocation in lieu of returning to the Covered Project and must otherwise comply with all the provisions of Section 6.10, below, regarding alternative housing options. The PHA cannot employ any tactics to pressure residents into relinquishing their right to return or accepting alternative housing options. A PHA may not terminate a resident's lease if the PHA fails to obtain the resident's consent and the resident seeks to exercise the right to return.

In the case of a multi-phase transaction, the resident has a right to return to the Covered Project or to other converted phases of the property which have converted and are available for occupancy at the time the resident is eligible to exercise the right to return. A relocated resident should get the benefit of improvements facilitated by the resident's relocation and conversion and completion of future phases cannot be assured. In most cases, this means that the resident's right to return must be accommodated within the Covered Project associated with resident's original unit. However, in those cases where improvements to multiple phases of a site are occurring simultaneously, the PHA or Project Owner may treat multiple Covered Projects on the same site as one for purposes of the right to return. If the PHA or Project Owner seeks to have the resident exercise the right of return at a future phase, the PHA or Project Owner would need to secure the resident's consent to such plan as an alternative housing option pursuant to Section 6.10, below.

In implementing the right of return, the Project Owner shall comply with all applicable fair housing laws and implementing regulations, including, but not limited to, the Fair Housing Act,

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<sup>73</sup> 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.

<sup>74</sup> 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](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.<sup>75</sup> In all circumstances, the move or relocation must be in compliance with applicable requirements of this Notice and consistent with applicable fair housing and civil rights requirements. Each type of move is discussed below.

#### *A) Moves within the same building or complex of buildings<sup>76</sup>*

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.<sup>77</sup> The final move must be to a unit which satisfies the right to return requirements specified in Section 6.2 of this Notice.

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<sup>75</sup> 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.

<sup>76</sup> 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.

<sup>77</sup> 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.<sup>78</sup>

*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

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<sup>78</sup> 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.<sup>79</sup> PHAs and Project Owners are also encouraged to provide

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<sup>79</sup> 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](http://www.hud.gov/rad).

#### *A) RAD Information Notice*

The RAD Information Notice is to be provided to residents at the very beginning of the RAD conversion planning process in order to convey general written information on potential project plans and residents' basic rights under RAD, and to facilitate residents' engagement with the PHA regarding the proposed RAD conversion. The PHA shall provide a RAD Information Notice to all residents of a Converting Project prior to the first of the two meetings with residents required by the RAD Notice, Section 1.8.2, and before submitting a RAD Application. This RAD Information Notice shall be provided without regard to whether the PHA anticipates any relocation of residents in connection with the RAD conversion. The RAD Information Notice must do the following:

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common areas is insufficient) and methods of delivery (e.g., certified mail, U.S. mail, or hand delivery) must be documented in the PHA's or Project Owner's files.

- Provide a general description of the conversion transaction (e.g., the Converting Project, whether the PHA anticipates any new construction or transfer of assistance, whether the PHA anticipates partnering with a developer or other entity to implement the transaction);
- Inform the resident that the early conceptual plans are likely to change as the PHA gathers more information, including, among other items, resident opinions, analysis of the capital needs of the property and financing options;
- Inform the resident that the household has a right to remain in the unit or, if any relocation is required, a right to return to an assisted unit in the Covered Project (which may be at the new site in the case of a transfer of assistance);
- Inform the resident that they will not be subject to any rescreening as a result of the conversion;
- Inform the resident that the household cannot be required to move permanently without the resident's consent, except in the case of a transfer of assistance when the resident may be required to move a reasonable distance, as determined by HUD, in order to follow the assisted unit;
- Inform the resident that if any relocation is involved in the transaction, the resident is entitled to relocation protections under the requirements of the RAD program and, in some circumstances, the requirements of the URA, which protections may include advance written notice of any move, advisory services, payment(s) and other assistance as applicable to the situation;
- Inform the resident that any resident-initiated move from the Converting Project could put any future relocation payment(s) and assistance at risk and instruct the resident not to move from the Converting Project; and
- Inform the resident that the RAD transaction will be completed consistent with fair housing and civil rights requirements, and provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

*B) General Information Notice (49 C.F.R. § 24.203(a))*

The purpose of the General Information Notice (GIN) is to provide information about URA protections to individuals who may be displaced as a result of federally-assisted projects involving acquisition, rehabilitation or demolition. A GIN provides a general description of the project, the activities planned, and the relocation assistance that may become available.

A GIN shall be provided to any person scheduled to be displaced *as soon as feasible* based on the facts of the situation. In certain instances, such as when the PHA knows that a project will involve acquisition, rehabilitation or demolition, “as soon as feasible” may be simultaneous with issuance of the RAD Information Notice. For any RAD conversion involving acquisition, rehabilitation or demolition, “as soon as feasible” shall be no later than 30 days following the issuance of the CHAP. In instances where acquisition, rehabilitation or demolition is not anticipated at the time of the CHAP but project plans change to include such activities, pursuant to this Notice the PHA shall provide the GIN as soon as feasible following the change in project plans.

For RAD, the GIN must do at least the following:

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

Because of the potential confusion caused by evolving policy directions in the RAD program regarding delivery of the GIN, for actions taken prior to the issuance of this Notice, HUD will consider the facts and circumstances of each conversion, with emphasis on the underlying URA requirements, in monitoring and enforcing a PHA's compliance with this requirement.

*C) Notice of Intent to Acquire (49 C.F.R. § 24.203(d))*

For conversions involving acquisition, the Project Owner (the "acquiring agency") may provide to residents of the Converting Project a Notice of Intent to Acquire (NOIA).<sup>80</sup> 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

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<sup>80</sup> 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.<sup>81</sup>

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.<sup>82</sup>

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.<sup>83</sup> 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.<sup>84</sup> PHAs or Project Owners may deem it appropriate to provide longer notice periods for persons who will be temporarily relocated

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<sup>81</sup> 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.

<sup>82</sup> The RAD program does not require a "notice of non-displacement," which HUD relocation policy generally uses for this purpose.

<sup>83</sup> 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.

<sup>84</sup> 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.<sup>85</sup>
- 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).<sup>86</sup>
- The notice must describe the available relocation assistance, the estimated amount of assistance based on the individual circumstances and needs, and the procedures for obtaining the assistance. The notice must be specific to the resident and his or her situation so that the resident will have a clear understanding of the type and amount of payments and/or other assistance the resident household may be entitled to claim.
- The notice must comply with all requirements for a URA Notice of Relocation Eligibility as described in 49 C.F.R. § 24.203(b).

(5) The notice must inform the resident that the relocation will be completed consistent with fair housing and civil rights requirements, and it must provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

For short-term relocations, the RAD Notice of Relocation may also contain the information required in the Notice of Return to the Covered Project (see Section 6.6(F)).

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<sup>85</sup> 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.

<sup>86</sup> 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.<sup>87</sup>

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).

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<sup>87</sup> 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.<sup>88</sup>

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

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<sup>88</sup> 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)).<sup>89</sup> 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.<sup>90</sup> HUD may request to review some or all of such records in the event of compliance

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<sup>89</sup> 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.

<sup>90</sup> Chapter 6 of HUD Handbook 1378 includes guidance on URA recordkeeping requirements.

concerns, in the event a project is identified for additional review based on administrative data, in the event of audits for purposes of monitoring the RAD program as a whole, upon selection of a random sample of projects and/or at other times at HUD's sole discretion. The records shall include resident files for all households relocated in connection with RAD and a resident log as described in this Section.

As part of such written record, the PHA or Project Owner must maintain data sufficient to deliver to HUD a resident log of every household that resides at the Converting Project at the time of the first required resident meeting on the proposed conversion pursuant to Section 1.8 of the RAD Notice (the "First Resident Meeting") and of every household that moves into the Converting Project after the First Resident Meeting and before the conversion of assistance under RAD. If any relocation is required, the log shall track resident status through completion of rehabilitation and construction, including re-occupancy after relocation. The resident log must include, but need not be limited to, the following information:

- Name of head of household
- PHA's resident identification number and/or the last four digits of the head-of-household's Social Security Number
- The head of household's race and ethnicity as reported on the HUD Form 50058 or the HUD Form 50058 MTW (the "Form 50058"). For purposes of the resident log, all references to the Form 50058 shall be to the form most recently prepared at the time of the First Resident Meeting or, for residents who moved in after the First Resident Meeting, the form most prepared at the time of the resident's initial occupancy.
- A Yes/No indication if there is any household member reported as having a disability on the Form 50058.
- A Yes/No indication if there is any household member reported as under the age of 18 on the effective date of action of the Form 50058;
- The household's relevant unit address, unit size and household size at the following times:
  - The time of the First Resident Meeting or the time of a resident's initial occupancy if after the First Resident Meeting
  - The time of the issuance of the CHAP or the time of a resident's initial occupancy if after the issuance of the CHAP
  - Proximate and prior to the PHA or Project Owner having authority to initiate involuntary relocation activities (i.e., at the time of issuance of the RCC unless otherwise approved by HUD upon extraordinary circumstances)
  - Completion of the relocation process following construction or rehabilitation and with return of all households exercising the right of return
- The household's residence status at the time of issuance of the RCC (e.g., in residence at the Converting Project, transferred to other public housing, moved out, evicted or other with explanation)
- The household's residence status upon completion of re-occupancy (e.g., in residence at the Covered Project/never relocated, in residence at the Covered Project/temporarily relocated and returned, transferred to other public housing, moved out, evicted, permanently relocated or other with explanation)
- The following dates for each resident household, as applicable:
  - Date of the RAD Information Notice

- Date of the GIN
- Date of the CHAP
- Date of NOIA
- Date of RAD Notice of Relocation
- Date of URA Notice of Relocation Eligibility
- Date of most recent consent to voluntary permanent relocation<sup>91</sup>
- 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.<sup>92</sup>
- 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

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<sup>91</sup> The most recent consent must be within 180 days of the actual relocation date, as discussed in Section 6.10(D).

<sup>92</sup> 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.<sup>93</sup>

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

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<sup>93</sup> 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.<sup>94</sup>
- 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;<sup>95</sup> b) his or her right to comment on and/or object to plans which would preclude the resident from returning to the Covered Project; c) the requirement that if the resident objects to such plans, the PHA or Project Owner must alter the project plans to accommodate the resident in the Covered Project; and d) a description of both the housing option(s) and benefits associated with the right of return and the alternative housing options and benefits being offered. In the description of the available housing options and benefits, the PHA or Project Owner shall include a description of any temporary housing options associated exercising the right of return and a description of any permanent alternative housing options as well as a reasonable estimate of the financial implications of all temporary and permanent options on the resident long-term.

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<sup>94</sup> 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.

<sup>95</sup> 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.<sup>96</sup> 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

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<sup>96</sup> 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.<sup>97</sup>

## **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)<sup>98</sup> or reasonable accommodation moves. Standard administration of the PHA's admissions and occupancy policy is not considered relocation.<sup>99</sup> Transfers not undertaken for the RAD project are not subject to URA. However, it is recommended that the PHA document the transfer carefully, including an acknowledgement by the resident that the transfer is not undertaken for the RAD project, is not

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<sup>97</sup> 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.

<sup>98</sup> Title IV, section 40001-40703.

<sup>99</sup> 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.

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Lourdes Castro-Ramirez  
Principal Deputy Assistant Secretary for  
Public and Indian Housing

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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**

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### **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.<sup>100</sup> 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.<sup>101</sup>

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<sup>100</sup> See 42 U.S.C. § 3604(f)(3)(c) and 24 C.F.R. § 100.205.

<sup>101</sup> 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](http://www.lep.gov/guidance/HUD_guidance_Jan07.pdf).<sup>102</sup>

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significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws." 24 C.F.R. § 5.150. Meaningful actions means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity. See 24 C.F.R. § 5.152.

<sup>102</sup> 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.”<sup>103</sup>

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.<sup>104</sup> These prohibitions apply to both determining the site of permanent facilities and a site for relocation of residents.

Furthermore, HUD’s implementing regulations prohibit discrimination, the denial of benefits, or the exclusion of participation of individuals with disabilities from the programs or activities of recipients of federal financial assistance because a recipient’s facilities are inaccessible. Such recipients must provide qualified individuals with disabilities with program access, which may require modification of architectural features of facilities in RAD transactions for individuals with disabilities to have access to the program. Certain architectural specifications apply to facilities that are altered or newly constructed with HUD financial assistance, such as facilities where assistance is transferred and facilities used as temporary or permanent relocation sites for residents of a project undergoing a RAD conversion. If alterations are made to a housing facility, the alterations to dwelling units in the facility are required, to the maximum extent feasible (i.e., if doing so would not impose undue financial and administrative burdens on the operation of the project), to be made readily accessible to and usable by individuals with disabilities. If alterations taken to a development that has 15 or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility (except when it requires removal of structural load-bearing members), or if the facility is newly constructed, then a minimum of 5% of the total dwelling units, or at least one unit in a development, whichever is greater, must be made accessible for persons with mobility impairments. An additional 2% of the units, but not less than one unit, in a development must be accessible for persons with hearing and vision impairments.

In addition, regulations implementing Section 504 require recipients to make reasonable accommodations for persons with disabilities. A reasonable accommodation is a change, adaptation, or modification to a policy, program, service, or workplace which will allow a qualified person with a disability to participate fully in a program, take advantage of a service, or perform a job. Section 504 also includes effective communication requirements, such as

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their programs and activities for LEP persons. E.O. 13166 directs all Federal agencies, including HUD, to issue guidance to help recipients of Federal financial assistance in providing such meaningful access to their programs.

<sup>103</sup> 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.

<sup>104</sup> 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.<sup>105</sup> 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.

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<sup>105</sup> 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](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.<sup>106</sup> 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

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<sup>106</sup>See 24 C.F.R. § 100.205 (Fair Housing Act) and 24 C.F.R. §§ 8.22 and 8.23 (Section 504). See also 28 C.F.R. § 35.151(b) and 28 C.F.R. part 36 (ADA Titles II and III regulations, respectively).

of grab bars; and kitchens and bathrooms are usable such that a person in a wheelchair can maneuver about the space.<sup>107</sup> These design and construction requirements apply whether the housing is privately or publicly funded, including housing supported by tax credits.<sup>108</sup>

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.<sup>109</sup> The accessibility standards for new construction under Section 504 are the Uniform Federal Accessibility Standards (UFAS).<sup>110</sup> 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.<sup>111</sup> 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.<sup>112</sup>

Title II of the ADA prohibits discrimination on the basis of disability in all services, programs, and activities provided or made available by public entities. Title II of the ADA applies to housing programs, including housing developed or operated by state and local governments, which includes PHAs. Title III of the ADA prohibits discrimination on the basis of disability by public accommodations, including rental offices, and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. All newly constructed or altered facilities, including facilities altered to

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<sup>107</sup> See 24 C.F.R. § 100.205.

<sup>108</sup> For more information about the design and construction provisions of the Fair Housing Act, see [www.fairhousingfirst.org](http://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](http://www.hud.gov/offices/fheo/library/hudjointstatement.pdf).

<sup>109</sup> See 24 C.F.R. § 8.3.

<sup>110</sup> 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.

<sup>111</sup> See 24 C.F.R. § 8.22.

<sup>112</sup> 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](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.<sup>113</sup>

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.<sup>114</sup> 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.<sup>115</sup>

All altered facilities covered by Titles II or III of the ADA must be altered in accordance with the U.S. Department of Justice's 2010 ADA Standards for Accessible Design and applicable ADA

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<sup>113</sup> 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.

<sup>114</sup> 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).

<sup>115</sup> 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.<sup>116</sup>

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.<sup>117</sup> 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.<sup>118</sup> 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.<sup>119</sup>

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<sup>116</sup> See <http://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards.htm>.

<sup>117</sup> See 24 C.F.R. §§ 8.26 and 8.27.

<sup>118</sup> See 28 C.F.R. § 35.150; 28 C.F.R. § 36.304.

<sup>119</sup> 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**

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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”<sup>120</sup>
    - 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)).

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<sup>120</sup> 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](http://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).<sup>121</sup>

## **VII. Relocation Budget**

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

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

For temporary relocation moves:

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

For permanent moves:

- Number and cost of one-time moves into another unit in the same building/complex.
  - Number and cost of one permanent move to a unit not within the same building/complex
  - Any required dislocation allowance
- 4) The estimated cost of projected increases in monthly housing costs and other expenses for temporary relocation (if applicable).
  - 5) The estimated cost of projected replacement housing payments (RHP) (42-month period for URA or 60-month period if Section 104(d) applies).
  - 6) Contingency costs estimated for carrying out the relocation process necessary to complete the proposed project.

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<sup>121</sup> See also, CPD Notice 2014-09 "Effective Date of Moving Ahead for Progress in the 21<sup>st</sup> 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](mailto:rad@hud.gov).

## 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 2019 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 2<sup>nd</sup> Increment RHF funds prior to developing the public or affordable housing under the proportionality requirements of the RHF Amendment, Option 3.
- 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
2017	PA01R00250117	08/16/2019	08/16/2021
2017	PA01R00250217	08/16/2019	08/16/2021
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

## **Appendix C: Annual Statement/Performance & Evaluation Report**

PHILADELPHIA HOUSING AUTHORITY  
ANNUAL STATEMENT/PERFORMANCE AND EVALUATION  
REPORT  
FEDERAL FISCAL YEAR 2014

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			
Line No.	Summary by Development Account	Total Estimated Cost			
		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	450,000.00	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			
	Kelvin A. Jeremiah, Interim 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			Capital Fund Program Grant No:		PA26P00250114					2014
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
701701	Finance	701100	Operating Subsidy	1492		1,446,969	0	0	0	
			Total Operating Subsidy Cost	1492		1,446,969	0	0	0	
			Management Improvements							
709709	ISM	700176	Computer Software Acquisition,Production Support,Customization,and Program Implementation	1492		550,000	545,404	545,404	481,536	PHA wide system support, upgrades, implemetations.
			Total Management Improvement Cost	1492		550,000	545,404	545,404	481,536	
			Administrative Costs							
000	PHA-Wide	700183	Administrative Salaries and Benefits	1492		3,664,331	3,664,331	3,854,222	3,854,222	Administrative Salaries and Benefits
			Total Administrative Cost	1492		3,664,331	3,664,331	3,854,222	3,854,222	
			Fees and Costs							
800800	Development	700185	A&E, Legal and Consultant Services	1492		1,000,000	998,836	998,836	670,484	pre-development and design cost
001	Johnson Homes	700185	A&E, Legal and Consultant Services	1492			7,683	7,683	7,683	pre-development and design cost
024	Queen lane Apts	700185	A&E, Legal and Consultant Services	1492		0	0	0	0	pre-development and design cost
030	Abbottsford Homes	700185	A&E, Legal and Consultant Services	1492		0	0	0	0	pre-development and design cost
050	Blumberg Apts	700185	A&E, Legal and Consultant Services	1492			120,000	120,000	676	pre-development and design cost
079	Plymouth Hall	700185	A&E, Legal and Consultant Services	1492			3,300	3,300	0	pre-development and design cost
173	Paschall LP Phase I	700185	A&E, Legal and Consultant Services	1492			0	0	0	pre-development and design cost
909	Strawbrry Mansion	700185	A&E, Legal and Consultant Services	1492			46,086	46,086	37,105	pre-development and design cost
401401	Housing Operations	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS	500,000	0	0	0	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
001	Johnson Homes	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		26,444	26,444	26,444	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
013	Wilson Park	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		924	924	924	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
015	Harrison Plaza	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		10,150	10,150	9,450	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations



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:		PA26P00250114					2014
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
018	Arch Homes	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		5,250	5,250	4,550	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
020	Spring Garden Apts	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		14,700	14,700	9,800	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
021	Schuylkill Falls	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		0	0	0	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
024	Queen Lane Apts	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		350	350	350	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
029	Hill Creek	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		14,700	14,700	11,200	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
031	Bartram Village	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		28,124	28,124	24,274	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
032	Oxford Village	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		9,708	9,708	9,008	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
034	Whitehall Apts	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		995	995	994	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
035	Haddington Homes	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		8,750	8,750	6,650	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
039	Westpark Apts	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		22,400	22,400	20,300	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
046	Haverford Homes	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		1,750	1,750	1,750	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
049	Morton Homes	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		9,100	9,100	8,750	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
055	Fairhill Apts	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		3,752	3,752	3,752	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
063	Katie B. Jackson	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		1,050	1,050	1,050	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
093	Westpark Plaza	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		3,302	3,302	3,302	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
901	Haddington	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		7,152	7,152	7,152	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
902	Mantua	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		13,300	13,300	12,950	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
903	Kingsessing	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		14,700	14,700	11,900	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
904	Germantown	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		3,500	3,500	3,500	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
905	Fairhill Square	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		17,850	17,850	14,000	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
906	Francisville	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		19,552	19,552	19,552	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations

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:		PA26P00250114					2014
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
907	Ludlow	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		11,808	11,808	11,808	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
908	Susquehanna	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		9,330	9,330	9,330	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
909	Strawberry Mansion	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS		13,758	13,758	13,758	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
910	Oxford Jefferson	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS	0	11,320	11,320	7,960	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
			Total Professional Services Costs and Fees	1492		1,500,000	1,459,624	1,459,624	970,405	
			PHA- Wide Site Improvements							
401401	Housing Operations	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies	450,000	913	913	720	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
001	Johnson Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		32,389	32,389	22,700	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
003	Richard Allen	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		7,471	7,471	6,937	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
010	Raymond Rosen	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		18,210	18,210	16,403	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
013	Wilson Park	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		37,063	37,063	32,998	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
014	Norris Apts	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		9,518	9,518	5,306	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
015	Harrison Plaza	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		43,812	43,812	21,572	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
018	Arch Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		5,302	5,302	5,302	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
020	Spring Garden Apts.	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		9,762	9,762	9,583	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
029	Hill Creek	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		23,955	23,955	19,716	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
030	Abbottsford Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		13,325	13,325	13,044	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
032	Oxford Village	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		38,056	38,056	36,652	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
034	Whitehall Apts	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		4,481	4,481	4,390	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
035	Haddington Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		4,987	4,987	4,707	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
042	Champlost Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		14,954	14,954	14,759	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.

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:		PA26P00250114					2014
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
046	Haverford Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		2,162	2,162	2,127	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
049	Morton Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		21,397	21,397	15,636	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
050	Blumberg Apts	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		1,847	1,847	1,847	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
055	Fairhill Apts	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		2,837	2,837	2,802	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
065	Collegeview	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		11,018	11,018	3,968	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
100	Cecil B Moore	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		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 accomodations.
104	Arlene Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		364	364	329	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
901	Haddington	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		45,171	45,171	43,485	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
902	Mantua	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		47,285	47,285	41,756	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
903	Kingsessing	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		90,973	90,973	87,887	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
904	Germantown	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		37,508	37,508	36,443	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
905	Fairhill Square	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		52,615	52,615	50,058	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
906	Francisville	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		98,803	98,803	96,527	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
907	Ludlow	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		86,325	86,325	79,380	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
908	Susquehanna	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		85,530	85,530	77,135	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
909	Strawberry Mansion	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		67,032	67,032	56,921	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
910	Oxford Jefferson	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies		28,136	28,136	24,868	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
050	Blumberg Apts	700186	Site Improvements	1492	Varies		0	0	0	Cut Branches, Remove Tree Stumps as Needed at Various Site Locations
001	Johnson Homes	700992	Landscaping, Tree Trimming	1492	Varies		1,636	1,636	1,636	Cut Branches, Remove Tree Stumps as Needed at Various Site Locations
029	Hill Creek	700992	Landscaping, Tree Trimming	1492	Varies		2,305	2,305	2,305	Cut Branches, Remove Tree Stumps as Needed at Various Site Locations
901	Haddington	700992	Landscaping, Tree Trimming	1492	Varies		1,278	1,278	1,278	Cut Branches, Remove Tree Stumps as Needed at Various Site Locations

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:		PA26P00250114					2014
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
902	Mantua	700992	Landscaping, Tree Trimming	1492	Varies		5,646	5,646	5,646	Cut Branches, Remove Tree Stumps as Needed at Various Site Locations
903	Kingsessing	700992	Landscaping, Tree Trimming	1492	Varies		9,248	9,248	7,909	Cut Branches, Remove Tree Stumps as Needed at Various Site Locations
907	Ludlow	700992	Landscaping, Tree Trimming	1492	Varies		251	251	251	Cut Branches, Remove Tree Stumps as Needed at Various Site Locations
908	Susquehanna	700992	Landscaping, Tree Trimming	1492	Varies		1,968	1,968	1,968	Cut Branches, Remove Tree Stumps as Needed at Various Site Locations
910	Oxford Jefferson	700992	Landscaping, Tree Trimming	1492	Varies		2,802	2,802	2,802	Cut Branches, Remove Tree Stumps as Needed at Various Site Locations
			Total PHA-Wide Site Improvements			450,000	971,789	971,789	863,211	
			Total Site Improvements	1492		450,000	971,789	971,789	863,211	
			PHA Wide Dwelling Structures							
039	West Park Apts	701165	Elevator Repairs	1492	1 LS	7,800,000	4,878,698	4,878,698	0	Replace Elevator System in all 3 High Rises at West Park Apartments
001	Johnson Homes	700179	Environmental Hazard Abatement	1492	Varies		9,824	9,824	9,824	To Remove Toxic Waste Materials As Needed
010	Raymond Rosen	700179	Environmental Hazard Abatement	1492	Varies		16,435	16,435	0	To Remove Toxic Waste Materials As Needed
015	Harrison Plaza	700179	Environmental Hazard Abatement	1492	Varies		11,679	11,679	11,679	To Remove Toxic Waste Materials As Needed
020	Spring Garden Apts	700179	Environmental Hazard Abatement	1492	Varies		14,639	14,639	8,859	To Remove Toxic Waste Materials As Needed
029	Hill Creek	700179	Environmental Hazard Abatement	1492	Varies		0	0	0	To Remove Toxic Waste Materials As Needed
034	Whitehall Apts	700179	Environmental Hazard Abatement	1492	Varies		6,551	6,551	6,551	To Remove Toxic Waste Materials As Needed
039	West Park Apts	700179	Environmental Hazard Abatement	1492	Varies		10,858	10,858	10,858	To Remove Toxic Waste Materials As Needed
055	Fairhill Apts	700179	Environmental Hazard Abatement	1492	Varies		11,843	11,843	11,843	To Remove Toxic Waste Materials As Needed
077	Bentley Hall	700179	Environmental Hazard Abatement	1492	Varies		6,792	6,792	6,792	To Remove Toxic Waste Materials As Needed
163	Mantua I	700179	Environmental Hazard Abatement	1492	Varies		8,004	8,004	8,004	To Remove Toxic Waste Materials As Needed
902	Mantua	700179	Environmental Hazard Abatement	1492	Varies		199	199	199	To Remove Toxic Waste Materials As Needed

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:		PA26P00250114					2014
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
906	Francisville	700179	Environmental Hazard Abatement	1492	Varies		0	0	0	To Remove Toxic Waste Materials As Needed
907	Ludlow	700179	Environmental Hazard Abatement	1492	Varies		1,689	1,689	1,689	To Remove Toxic Waste Materials As Needed
910	Oxford Jefferson	700179	Environmental Hazard Abatement	1492	Varies		50	50	50	To Remove Toxic Waste Materials As Needed
400400	Housing Operations	700625	Roof Repair/Replacement	1492	Varies	0	0	0	0	As needed Roof Repair/Replacements Agency Wide
013	Wilson Park	700874	Combustion Upgrades	1492	1 LS	0	73,432	73,432	71,682	Major Repairs to the Central Boiler System
065	Collegeview	700874	Combustion Upgrades	1492	1 LS	0	39,594	39,594	39,594	Major Repairs to the Central Boiler System
907	Ludlow	700874	Combustion Upgrades	1492	1 LS	0	863	863	863	Heater Replacement at CBMO 907 Ludlow
010	Raymond Rosen	700875	Electrical distribution systems	1492	1 LS	0	6,691	6,691	6,691	As needed Repairs to the Electrical System
030	Abbottsford Homes	700875	Electrical distribution systems	1492	1 LS	0	176,537	176,537	176,537	Major Repairs to the Electrical System
049	Morton Homes	700875	Electrical distribution systems	1492	1 LS	1,500,000	2,709,703	2,709,703	116,792	Major Repairs to the Electrical System
001	Johnson Homes	700878	Plumbing Upgrades	1492	1 LS	0	116,635	116,635	62,885	Replace Main Water Lines as needed
015	Harrison Plaza	700878	Plumbing Upgrades	1492	1 LS	0	31,150	31,150	29,393	Replace Main Water Lines as needed
031	Bartram Village	700878	Plumbing Upgrades	1492	1 LS	0	9,093	9,093	9,093	Replace Main Water Lines as needed
035	Haddington Homes	700878	Plumbing Upgrades	1492	1 LS	0	3,086	3,086	0	Replace Main Water Lines as needed
065	Collegeview	700878	Plumbing Upgrades	1492	1 LS	0	4,013	4,013	4,013	Replace Main Water Lines as needed
066	Holmecrest Homes	700878	Plumbing Upgrades	1492	1 LS	0	190,393	190,393	102,530	Replace Main Water Lines as needed
055	Fairhill Apts	701090	Fire Safety System Upgrades	1492	1 LS	0	11,040	11,040	11,040	Repair and replace Sprinkler System Components As Needed
076	Emlen Arms	701090	Fire Safety System Upgrades	1492	1 LS	0	7,800	7,800	7,369	Repair and replace Sprinkler System Components As Needed
014	Norris Apts	701095	HVAC Upgrades	1492	1 LS	0	3,576	3,576	3,576	Repair and Replace Heating Systems as needed at West Park Apts
039	West Park Apts	701095	HVAC Upgrades	1492	1 LS	0	378,394	378,394	346,595	Repair and Replace Heating Systems as needed at West Park Apts
003	Richard Allen	701431	Vacant Unit Rehab Program	1492	Varies	0	5,021	5,021	5,021	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units

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:	PA26P00250114						2014
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
010	Raymond Rosen	701431	Vacant Unit Rehab Program	1492	Varies	0	84,816	84,816	84,816	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
013	Wilson Park	701431	Vacant Unit Rehab Program	1492	Varies	0	61,761	61,761	61,761	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
014	Norris Apts	701431	Vacant Unit Rehab Program	1492	Varies	0	46,756	46,756	46,756	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
015	Harrison Plaza	701431	Vacant Unit Rehab Program	1492	Varies	0	642	642	642	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
020	Spring Garden Apts	701431	Vacant Unit Rehab Program	1492	Varies	0	3,473	3,473	3,473	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
029	Hill Creek	701431	Vacant Unit Rehab Program	1492	Varies	0	2,553	2,553	2,553	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
031	Bartram Village	701431	Vacant Unit Rehab Program	1492	Varies	0	20,139	20,139	20,139	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
032	Oxford Village	701431	Vacant Unit Rehab Program	1492	Varies	0	1,431	1,431	1,431	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
034	Whitehall	701431	Vacant Unit Rehab Program	1492	Varies	0	29,130	29,130	28,730	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
035	Haddington Homes	701431	Vacant Unit Rehab Program	1492	Varies	0	124	124	124	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
039	West Park Apts	701431	Vacant Unit Rehab Program	1492	Varies	0	697	697	697	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
042	Champlost Home	701431	Vacant Unit Rehab Program	1492	Varies	0	1,172	1,172	1,172	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
046	Haverford Homes	701431	Vacant Unit Rehab Program	1492	Varies	0	349	349	349	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
049	Morton Homes	701431	Vacant Unit Rehab Program	1492	Varies	0	13,606	13,606	13,606	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
050	Blumberg Apts	701431	Vacant Unit Rehab Program	1492	Varies	0	8,842	8,842	8,842	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
055	Fairhill Apts	701431	Vacant Unit Rehab Program	1492	Varies	0	18,194	18,194	18,194	Interior Repairs, Kitchens, Bathrooms to Conventional Sites Units
024	Queen Lane Apts	701432	Unit renovations	1492	Varies	0	0	0	0	Cost to Renovate Units that are not part of the Queen Lane LP
015	Harrison Plaza	701433	Repair exterior wall surfaces	1492	Varies		232,880	232,880	172,144	Emergency Repairs to the Exterior Brickwork
906	Francisville	701433	Repair exterior wall surfaces	1492	Varies		22,653	22,653	22,652	Emergency Repairs to the Exterior Brickwork
001	Johnson Homes	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	52,345	52,390	51,116	504 Unit Modification/Fair Housing
003	Richard Allen	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	16,926	16,926	16,926	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:	PA26P00250114						2014
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
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010	Raymond Rosen	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	10,103	10,103	9,945	504 Unit Modification/Fair Housing
013	Wilson Park	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	15,757	15,757	15,572	504 Unit Modification/Fair Housing
014	Norris Apts	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	6,403	6,403	6,403	504 Unit Modification/Fair Housing
015	Harrison Plaza	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	25,357	25,479	25,479	504 Unit Modification/Fair Housing
018	Arch Homes	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	465	687	687	504 Unit Modification/Fair Housing
020	Soring Garden Apts	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	18,738	18,738	18,682	504 Unit Modification/Fair Housing
024	Queen Lane Apts	701098	504 Unit Modification/Fair Housing	1492	Varies	0	0	0	0	504 Unit Modification/Fair Housing
029	Hill Creek	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	12,919	12,919	12,874	504 Unit Modification/Fair Housing
030	Abbottsford	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	2,506	2,506	2,506	504 Unit Modification/Fair Housing
031	Bartram Village	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	12,532	12,532	12,532	504 Unit Modification/Fair Housing
032	Oxford Village	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	40,295	40,295	39,558	504 Unit Modification/Fair Housing
034	Whitehall	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	9,361	9,361	7,178	504 Unit Modification/Fair Housing
035	Haddington Homes	701098	504 Unit Modification/Fair Housing	1492	Varies	0	8,432	8,432	8,432	504 Unit Modification/Fair Housing
039	West Park Apts	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	1,474	1,474	1,474	504 Unit Modification/Fair Housing
042	Champlost Home	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	1,490	1,490	1,078	504 Unit Modification/Fair Housing
046	Haverford Homes	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	0	0	0	504 Unit Modification/Fair Housing
049	Morton Homes	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	11,211	11,211	11,054	504 Unit Modification/Fair Housing
050	Blumberg	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	491	491	491	504 Unit Modification/Fair Housing
054	Parkview	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	0	0	0	504 Unit Modification/Fair Housing
055	Fairhill Apts	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	8,589	8,589	6,255	504 Unit Modification/Fair Housing
062	Cassie B. Holley	701098	504 Unit Modification/Fair Housing	1492	Varies	0	997	997	997	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:		PA26P00250114					2014
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
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063	Katie B. Jackson	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	706	1,103	1,103	504 Unit Modification/Fair Housing
065	Collegeview	701098	504 Unit Modification/Fair Housing	1492	Varies	0	383	383	383	504 Unit Modification/Fair Housing
066	Holmecrest	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	1,308	1,308	1,308	504 Unit Modification/Fair Housing
076	Emlen Arms	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	0	0	0	504 Unit Modification/Fair Housing
077	Bentley Hall	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	3,311	3,311	2,637	504 Unit Modification/Fair Housing
079	Plymouth Hall	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	122	122	122	504 Unit Modification/Fair Housing
093	Westpark Plaza	701098	504 Unit Modification/Fair Housing	1492	Varies	0	1,695	1,695	1,695	504 Unit Modification/Fair Housing
100	Cecil B Moore	701098	504 Unit Modification/Fair Housing	1492	Varies	0	614	614	614	504 Unit Modification/Fair Housing
114	Gladys B. Jacobs	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	2,609	2,609	2,546	504 Unit Modification/Fair Housing
133	Richard Allen IIIA	701098	504 Unit Modification/Fair Housing	1492	Varies	0	440	440	440	504 Unit Modification/Fair Housing
145	Lucien Blackwell I	701098	504 Unit Modification/Fair Housing	1492	Varies	0	472	472	472	504 Unit Modification/Fair Housing
149	Martin Luther King IV	701098	504 Unit Modification/Fair Housing	1492	Varies	0	224	224	224	504 Unit Modification/Fair Housing
152	Germantown House	701098	504 Unit Modification/Fair Housing	1492	Varies	0	4,395	4,395	4,395	504 Unit Modification/Fair Housing
153	Lucien Blackwell II	701098	504 Unit Modification/Fair Housing	1492	Varies	0	2,404	2,404	2,404	504 Unit Modification/Fair Housing
158	Nellie Reynolds Garden	701098	504 Unit Modification/Fair Housing	1492	Varies	0	0	343	343	504 Unit Modification/Fair Housing
160	Warnock I	701098	504 Unit Modification/Fair Housing	1492	Varies	0	3,072	3,072	3,072	504 Unit Modification/Fair Housing
163	Mantua I	701098	504 Unit Modification/Fair Housing	1492	Varies	0	4,425	4,425	4,425	504 Unit Modification/Fair Housing
178	Queen's Row	701098	504 Unit Modification/Fair Housing	1492	Varies	0	2,713	4,194	4,194	504 Unit Modification/Fair Housing
501	712 N. 16th Street	701098	504 Unit Modification/Fair Housing	1492	Varies	0	1,159	1,159	1,159	504 Unit Modification/Fair Housing
901	Scattered Sites	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	12,277	12,277	12,036	504 Unit Modification/Fair Housing
902	Scattered Sites	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	685,612	737,773	714,392	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:		PA26P00250114					2014
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
903	Scattered Sites	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	39,541	39,541	39,322	504 Unit Modification/Fair Housing
904	Scattered Sites	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	36,051	36,051	34,887	504 Unit Modification/Fair Housing
905	Scattered Sites	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	29,740	31,366	30,975	504 Unit Modification/Fair Housing
906	Scattered Sites	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	44,439	44,439	44,193	504 Unit Modification/Fair Housing
907	Scattered Sites	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	32,073	32,164	31,127	504 Unit Modification/Fair Housing
908	Scattered Sites	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	20,018	20,018	19,374	504 Unit Modification/Fair Housing
909	Scattered Sites	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	60,735	60,735	60,482	504 Unit Modification/Fair Housing
910	Scattered Sites	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000	16,134	16,134	16,134	504 Unit Modification/Fair Housing
			Total PHA-Wide Dwelling Unit Improvements			10,200,000	10,556,567	10,613,054	2,841,798	
			Scattered Sites Dwelling Unit Renovation							
901	Haddington	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000	88,000	20,204	20,204	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
902	Mantua	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000	804,416	805,234	797,216	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
903	Kingsessing	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000	510,000	471,665	468,319	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
904	Germantown/Hunting Park	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000	300,000	290,598	287,322	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
905	Fairhill Square	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000	1,164,247	1,125,557	1,117,780	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	1492	Varies	600,000	510,000	460,172	449,723	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	1492	Varies	600,000	23,035	23,035	22,716	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	1492	Varies	600,000	1,325,715	1,450,133	1,424,298	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	1492	Varies	600,000	876,406	876,406	868,444	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
910	Oxford Jefferson	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000	517,910	500,774	497,742	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
901	Haddington	701309	Comprehensive Unit MOD	1492	Varies	0	0	0	0	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation

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:		PA26P00250114					2014
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
902	Mantua	701309	Comprehensive Unit MOD	1492	Varies	0	95,537	95,537	95,537	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
903	Kingsessing	701309	Comprehensive Unit MOD	1492	Varies	0	309,934	309,934	309,934	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
906	Francisville	701309	Comprehensive Unit MOD	1492	Varies	0	58,940	58,940	58,940	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
908	Susquehanna	701309	Comprehensive Unit MOD	1492	Varies	0	512,368	512,368	512,359	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
909	Strawberry Mansion	701309	Comprehensive Unit MOD	1492	Varies	0	200,135	200,135	200,135	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
910	Oxford Jefferson	701309	Comprehensive Unit MOD	1492	Varies	0	283,501	283,501	283,501	Major Renovations to Scattered Sites Units for Blumberg Resident Relocation
907	Ludlow	700782	Masonry	1492	1	0	27,453	27,453	20,502	Repair Exterior Façade of Unit in SS 907 Ludlow
901	Haddington	700455	Comp Unit Renovations Work	1492	Varies	0	270	270	270	As Needed Structural Repairs at Scattered Sites Locations
902	Mantua	700455	Comp Unit Renovations Work	1492	Varies	0	16,706	16,706	16,706	As Needed Structural Repairs at Scattered Sites Locations
903	Kingsessing	700455	Comp Unit Renovations Work	1492	Varies	0	5,898	5,898	5,898	As Needed Structural Repairs at Scattered Sites Locations
904	Germantown/Hunting Park	700455	Comp Unit Renovations Work	1492	Varies	0	0	0	0	As Needed Structural Repairs at Scattered Sites Locations
905	Fairhill Square	700455	Comp Unit Renovations Work	1492	Varies	0	2,868	2,868	2,868	As Needed Structural Repairs at Scattered Sites Locations
906	Francisville	700455	Comp Unit Renovations Work	1492	Varies	0	85	85	85	As Needed Structural Repairs at Scattered Sites Locations
907	Ludlow	700455	Comp Unit Renovations Work	1492	Varies	0	2,714	2,714	2,714	As Needed Structural Repairs at Scattered Sites Locations
908	Susquehanna	700455	Comp Unit Renovations Work	1492	Varies	0	0	0	0	As Needed Structural Repairs at Scattered Sites Locations
909	Strawberry Mansion	700455	Comp Unit Renovations Work	1492	Varies	0	0	0	0	As Needed Structural Repairs at Scattered Sites Locations
910	Oxford Jefferson	700455	Comp Unit Renovations Work	1492	Varies	0	1,914	1,914	1,914	As Needed Structural Repairs at Scattered Sites Locations
905	Fairhill Square	701390	Comprehensive Unit Rehab	1492	Varies	0	0	0	0	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
906	Francisville	701390	Comprehensive Unit Rehab	1492	Varies	0	0	0	0	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
909	Strawberry Mansion	701390	Comprehensive Unit Rehab	1492	Varies	0	8,154	8,154	8,154	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
903	Kingsessing	701489	Comprehensive Unit MOD	1492	Varies	0	271,080	271,080	176,360	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: PA26P00250114							
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
906	Francisville	701489	Comprehensive Unit MOD	1492	Varies	0	71,035	71,035	71,035	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
907	Ludlow	701489	Comprehensive Unit MOD	1492	Varies	0	406,550	406,550	325,050	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
908	Susquehanna	701489	Comprehensive Unit MOD	1492	Varies	0	252,085	252,085	168,585	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
909	Strawberry Mansion	701489	Comprehensive Unit MOD	1492	Varies	0	248,320	248,320	165,960	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
			Scattered Site Unit Renovation Total		235 units	6,000,000	8,895,276	8,799,325	8,380,270	
			Total Dwelling Structures	1492		16,200,000	19,451,843	19,412,379	11,222,067	
			Non-Dwelling Structures	1492						
020	Spring Garden Apts	701095	HVAC Upgrades	1492	1 LS	0	1,285	1,285	1,285	Repairs to the Community Center A/C System at Spring Garden Apts
600600	Communications Dept	701508	Signage	1492	Varies	0	3,210	3,210	3,210	Replace Housing Authority Signage Authority Wide
010	Raymond Rosen	701508	Signage	1492	Varies	0	9,499	0	0	Replace Housing Authority Signage Authority Wide
013	Wilson Park - Senior	701508	Signage	1492	Varies	0	9,292	0	0	Replace Housing Authority Signage Authority Wide
014	Norris Apts	701508	Signage	1492	Varies	0	1,904	0	0	Replace Housing Authority Signage Authority Wide
031	Bartram Village	701508	Signage	1492	Varies	0	1,639	0	0	Replace Housing Authority Signage Authority Wide
032	Oxford Village	701508	Signage	1492	Varies	0	275	0	0	Replace Housing Authority Signage Authority Wide
034	Whitehall Apts	701508	Signage	1492	Varies	0	803	0	0	Replace Housing Authority Signage Authority Wide
042	Champlost Home	701508	Signage	1492	Varies	0	586	0	0	Replace Housing Authority Signage Authority Wide
046	Haverford Homes	701508	Signage	1492	Varies	0	349	0	0	Replace Housing Authority Signage Authority Wide
049	Morton Homes	701508	Signage	1492	Varies	0	1,412	0	0	Replace Housing Authority Signage Authority Wide
050	Blumberg Apts	701508	Signage	1492	Varies	0	2,842	0	0	Replace Housing Authority Signage Authority Wide
055	Fairhill Apts	701508	Signage	1492	Varies	0	1,842	0	0	Replace Housing Authority Signage Authority Wide
003	Richard Allen	700292	Doors and windows	1492	Varies		7,125	7,125	0	Replace Exterior Entry Doors

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:		PA26P00250114					2014
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
114	Gladys B. Jacobs	700292	Doors and windows	1492	Varies		2,375	2,375	1,995	Replace Exterior Entry Doors
			Total Non-Dwelling Structures	1492		0	44,437	13,995	6,490	
			Non-Dwelling Equipment							
707707	Budget	700798	Community Space F & EM	1492	1LS	25,000	114,359	114,359	114,359	As needed replacement of office equipment throughout PHA office and site locations
707707	Budget	701204	Community Space F & EM	1492	1LS	0	28,662	28,662	28,534	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	1492	1 LS	250,000	649,842	649,842	636,973	The purchase of 200 replacement computers throughout PHA. Also includes server and network upgrades/replacements,
709709	ISM	700614	Telephone Infrastructure Upgrades	1492	1 LS	100,000	33,448	33,448	24,015	Telephone equipments including but not limited to network switches and IVR upgrades
455455	Housing Operations Specialty Crew	701203	Maintenance Equipment	1492	1 LS	75,000	573,665	573,665	572,519	repair/replace maintenance equipment including but not limited to landscaping, snow removal and small construcion equipment. To be used through out
001	Johnson Homes	701203	Maintenance Equipment	1492	1 LS	0	719	719	719	repair/replace maintenance equipment including but not limited to landscaping, snow removal and small construcion equipment. To be used through out
013	Wilson Park	701203	Maintenance Equipment	1492	1 LS	0	719	719	719	repair/replace maintenance equipment including but not limited to landscaping, snow removal and small construcion equipment. To be used through out
906	Francisville	701203	Maintenance Equipment	1492	1 LS	0	719	719	719	repair/replace maintenance equipment including but not limited to landscaping, snow removal and small construcion equipment. To be used through out
001	Johnson Homes	930012	Playground Equipment	1492	1 LS	0	71,365	71,365	68,932	Replace Hazardous Playground EuiPMENT for Safety Reasons
010	Raymond Rosen	930012	Playground Equipment	1492	1 LS	0	62,000	62,000	61,984	Replace Hazardous Playground EuiPMENT for Safety Reasons
013	Wilson Park	930012	Playground Equipment	1492	1 LS	0	95,038	95,038	95,038	Replace Hazardous Playground EuiPMENT for Safety Reasons
			Total Non-Dwelling Equipment	1492		450,000	1,630,536	1,630,536	1,604,511	
401401	Housing Operations	700882	Demolition	1492	1 LS	377,750	0	0	0	Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspectors
907	Ludlow	700882	Demolition	1492	1 LS	0	10,000	10,000	10,000	Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspectors
909	Strawberry Mansion	700882	Demolition	1492	1 LS	0	365,223	365,223	349,726	Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspectors
910	Oxford Jefferson	700882	Demolition	1492	1 LS	0	10,000	10,000	10,000	Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspectors
			Total Demolition	1492		377,750	385,223	385,223	369,726	
401401	Housing Operations	700854	Relocation	1492	1 LS	150,000	0	0	0	Relocations as needed through out PHA.

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: PA26P00250114							
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
001	Johnson Homes	700854	Relocation	1492	1 LS	0	2,622	2,622	2,622	Relocations as needed through out PHA.
010	Raymond Rosen	700854	Relocation	1492	1 LS	0	2,572	2,572	2,572	Relocations as needed through out PHA.
013	Wilson Park - Senior	700854	Relocation	1492	1 LS	0	2,215	2,215	2,215	Relocations as needed through out PHA.
014	Norris Apts	700854	Relocation	1492	1 LS	0	1,043	1,043	1,043	Relocations as needed through out PHA.
015	Harrison Plaza	700854	Relocation	1492	1 LS	0	1,094	1,094	1,094	Relocations as needed through out PHA.
018	Arch Homes	700854	Relocation	1492	1 LS	0	3,864	3,864	3,864	Relocations as needed through out PHA.
020	Spring Garden Apts	700854	Relocation	1492	1 LS	0	1,171	1,171	1,171	Relocations as needed through out PHA.
029	Hill Creek	700854	Relocation	1492	1 LS	0	0	0	0	Relocations as needed through out PHA.
031	Bartram Village	700854	Relocation	1492	1 LS	0	35,050	35,050	35,050	Relocations as needed through out PHA.
034	Whitehall	700854	Relocation	1492	1 LS	0	2,732	2,732	2,732	Relocations as needed through out PHA.
035	Haddington Homes	700854	Relocation	1492	1 LS	0	2,382	2,382	2,382	Relocations as needed through out PHA.
039	West Park Apts	700854	Relocation	1492	1 LS	0	3,497	3,497	3,497	Relocations of Blumberg Residents through out PHA.
050	Blumberg Apts	700854	Relocation	1492	1 LS	0	1,035,680	1,035,680	1,025,547	Relocations of Blumberg Residents through out PHA.
051	Whitman Park	700854	Relocation	1492	1 LS	0	1,043	1,043	1,043	Relocations of Blumberg Residents through out PHA.
062	Cassie B. Holley	700854	Relocation	1492	1 LS	0	0	0	0	Relocations of Blumberg Residents through out PHA.
063	Katie B. Jackosn	700854	Relocation	1492	1 LS	0	1,227	1,227	1,227	Relocations of Blumberg Residents through out PHA.
901	Haddington	700854	Relocation	1492	1 LS	0	4,228	4,228	4,228	Relocations as needed through out PHA.
902	Mantua	700854	Relocation	1492	1 LS	0	3,855	3,855	3,855	Relocations as needed through out PHA.
903	Kingsessing	700854	Relocation	1492	1 LS	0	3,653	3,653	3,653	Relocations as needed through out PHA.
904	Germantown	700854	Relocation	1492	1 LS	0	4,621	4,621	4,621	Relocations as needed through out PHA.
905	Fairhill Square	700854	Relocation	1492	1 LS	0	8,249	8,249	8,249	Relocations as needed through out PHA.

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:	PA26P00250114						2014
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
906	Francisville	700854	Relocation	1492	1 LS	0	39,419	39,419	39,419	Relocations as needed through out PHA.
907	Ludlow	700854	Relocation	1492	1 LS	0	6,399	6,399	6,399	Relocations as needed through out PHA.
908	Susquehanna	700854	Relocation	1492	1 LS	0	5,508	5,508	5,508	Relocations as needed through out PHA.
909	Strawberry Mansion	700854	Relocation	1492	1 LS	0	7,784	7,784	7,784	Relocations as needed through out PHA.
910	Oxford Jefferson	700854	Relocation	1492	1 LS	0	1,416	1,416	1,416	Relocations as needed through out PHA.
			Total Relocation	1492		150,000	1,181,324	1,181,324	1,171,191	
903	Kingsessing	801031	Dwelling Construction	1492			570	570	570	Interior work on various scattered sites units including walls, kitchens and bathrooms
905	Fairhill Square	801031	Dwelling Construction	1492			136	136	136	Interior work on various scattered sites units including walls, kitchens and bathrooms
906	Francisville	801031	Dwelling Construction	1492			217	217	217	Interior work on various scattered sites units including walls, kitchens and bathrooms
			Total Dwelling Construction	1492			923	923	923	
700700	Finance	701491	Bond Debt Service - Principle	1501	1 LS	9,721,849	4,575,000	4,575,000	4,575,000	bond debt principle payment for Tasker Bond
700700	Finance	701498	Bond Debt Service - Interest	1501	1 LS	2,132,411	2,732,876	2,732,876	2,732,876	bond debt interest payment for Tasker Bond
			Total Debt Service	1501		11,854,260	7,307,876	7,307,876	7,307,876	
			GRAND TOTAL			36,643,310	36,643,310	36,763,296	27,852,160	

PHILADELPHIA HOUSING AUTHORITY  
ANNUAL STATEMENT/PERFORMANCE AND EVALUATION  
REPORT  
FEDERAL FISCAL YEAR 2015

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			
Line No.	Summary by Development Account	Total Estimated Cost			
		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	541,648.37
4	1410 Administrative Costs			4,106,818.91	4,106,818.91
5	1411 Audit			0.00	0.00
6	1415 Liquidated Damages			0.00	0.00
7	1430 Fees and Costs			2,469,818.38	1,796,104.82
8	1440 Site Acquisition			0.00	0.00
9	1450 Site Improvements			0.00	0.00
10	1460 Dwelling Structures			10,769,253.91	8,732,032.07
11	1465.1 Dwelling Equipment-Nonexpendable			0.00	0.00
12	1470 Non-Dwelling Space			8,934,134.00	239,564.38
13	1475 Non-Dwelling Equipment			28,830.74	27,439.60
14	1485 Demolition			0.00	0.00
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration	29,696,241.75	29,698,589.75	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	36,998,196.00	33,063,842.98	21,600,868.04
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		
	Kelvin A. Jeremiah, 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 / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
701701	Finance	701100	Operating Subsidy	1492		879,769.75	86,302	0	0	
			Total Operating Subsidy Cost	1492		879,769.75	86,302	0	0	
			Management Improvements							
709709	ISM	700176	Computer Software Acquisition,Production Support,Customization,and Program Implementation	1492		600,000.00	600,000	597,727	541,648	PHA wide system support, upgrades, implemetations.
			Total Management Improvement Cost	1492		600,000.00	600,000	597,727	541,648	
			Administrative Costs							
000	PHA-Wide	700183	Administrative Salaries and Benefits	1492		3,699,862.00	4,106,819	4,106,819	4,106,819	Administrative Salaries and Benefits
			Total Administrative Cost	1492		3,699,862.00	4,106,819	4,106,819	4,106,819	
			Fees and Costs							
800800	Development	700185	A&E, Legal and Consultant Services	1492		1,000,000.00	565,273	428,680	428,680	pre-development and design cost
014	Norris	700185	A&E, Legal and Consultant Services	1492		0.00	81,193	89,627	46,575	pre-development and design cost
015	Harrison Plaza	700185	A&E, Legal and Consultant Services	1492		0.00	254,723	254,724	46,487	pre-development and design cost
018	Arch Homes	700185	A&E, Legal and Consultant Services	1492		0.00	247,487	247,487	23,127	pre-development and design cost
024	Queen Lane	700185	A&E, Legal and Consultant Services	1492		0.00	65,821	65,108	61,271	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 HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
030	Abbottsford	700185	A&E, Legal and Consultant Services	1492		0.00	94,093	0	0	pre-development and design cost
035	Haddington Homes	700185	A&E, Legal and Consultant Services	1492		0.00	94,093	0	0	pre-development and design cost
039	West Park Apts.	700185	A&E, Legal and Consultant Services	1492		0.00	145,651	145,651	70,731	pre-development and design cost
050	Blumberg	700185	A&E, Legal and Consultant Services	1492		0.00	224,977	224,977	118,074	pre-development and design cost
079	Plymouth Hall	700185	A&E, Legal and Consultant Services	1492		0.00	69,575	0	0	pre-development and design cost
093	Westpark Plaza	700185	A&E, Legal and Consultant Services	1492		0.00	69,575	0	0	pre-development and design cost
909	Strawberry Mansion	700185	A&E, Legal and Consultant Services	1492		0.00	164,265	164,265	152,909	pre-development and design cost
800800	Development	700039	Energy Efficiencies	1492	1 LS	0.00	350,000	350,000	350,000	Energy Efficiency Audit Throughout PHA
401401	Housing Operations	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS	500,000.00	498,250	498,250	498,250	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
901	Haddington Homes	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS	0.00	700	350	0	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
910	Oxford Jefferson	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1492	1 LS	0.00	1,050	700	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	2,926,725	2,469,818	1,796,105	
			Site Acquisition							

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 HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
			Total Site Acquisition Costs	1492		0.00	0	0	0	
			<u>PHA- Wide Site Improvements</u>							
015	Harrison Plaza	700441	Comprehensive Building Renovation	1492	Varies	4,000,000.00	0	0	0	Major Building Envelope Repairs at Harrison Plaza
401401	Housing Operations	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies	280,000.00	276,545	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 accomodations.
902	Mantua	700174	504 Exterior Improvements, Ramps, Exterior Glides	1492	Varies	0.00	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 accomodations.
013	Wilson Prk	701095	HVAC Upgrades	1492	1 LS	0.00	75,000	62,209	0	Chimney Repair for Hi-Rise Senior Bldg
031	BRTRAM Village	701097	Asphalt/Paving	1492	1 LS	0.00	25,665	25,665	25,665	Gneral Repaving of Site Roadways as needed
			Total PHA-Wide Site Improvements			4,280,000.00	380,665.00	91,329.00	29,120.00	
			Total Site Improvements	1492		4,280,000.00	380,665	91,329	29,120	
			<u>PHA Wide Dwelling Structures</u>							
039	West Park Apts	701165	Elevator Repairs	1492	1 LS	0.00	0			Replace Elevator System in all 3 High Rises at West Park Apartments
029	Hill Creek	701434	Roof Repair/Replacement	1492	Varies	526,000.00	454,289	36,784	0	Replace roofs as needed
063	Katie B. Jackosn	701434	Roof Repair/Replacement	1492	Varies	130,000.00	0	0	0	Replace roofs as needed

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 HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
076	Emlen Arms	701434	Roof Repair/Replacement	1492	Varies	150,000.00	0	0	0	Replace roofs as needed
093	Westpart Plaza	701434	Roof Repair/Replacement	1492	Varies	109,000.00	0	0	0	Replace roofs as needed
902	Mantua	700463	Comprehensive Unit Renovations	1492	Varies	0.00	472,767	1,100,242	1,079,696	Major Upgrades/Repairs to Vacant Units
905	Fairhill Square	700463	Comprehensive Unit Renovations	1492	Varies	0.00	83,282	207,360	204,792	Major Upgrades/Repairs to Vacant Units
906	Francisville	700463	Comprehensive Unit Renovations	1492	Varies	0.00	117,719	193,296	146,089	Major Upgrades/Repairs to Vacant Units
907	Ludlow	700463	Comprehensive Unit Renovations	1492	Varies	0.00	102,990	148,760	540,865	Major Upgrades/Repairs to Vacant Units
909	Strawberry Mansion	700463	Comprehensive Unit Renovations	1492	Varies	0.00	225,410	545,249	443,688	Major Upgrades/Repairs to Vacant Units
910	Oxford Jefferson	700463	Comprehensive Unit Renovations	1492	Varies	0.00	210,887	450,594		Major Upgrades/Repairs to Vacant Units
020	Spring Garden Apartments	701166	Heating Plant Upgrades	1492	Varies	2,500,000.00	0	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	0	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	0	0	0	Install/Replace Tub Diverter system throught units at Mount Olivet LP
138	Mount Olivet LP	700878	Plumbing Upgrades	1492	Varies	500,000.00	0	0	0	Install/Replace Tub Diverter system throught units at Mount Olivet LP
039	West Park Apts	700465	Trash Compactors	1492	3	600,000.00	0	0	0	Replace Trash Compactors in the 3 High Rises at West Park Apts

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 HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
049	Morton Homes	700875	Electrical distribution systems	1492	1 LS	0.00	0			Remove/replace all subpanels; remove/replace main electrical distribution panel; remove/replace existing electrical EMT condute and cable from
039	Westpark Apts	701078	Doors	1492	1 LS	0.00	62,277	48,024	48,014	Replace Exterior Steel Doors
055	Fairhill Apts	701078	Doors	1492	1 LS	0.00	69,936	69,935	69,935	Replace Exterior Steel Doors
001	Johnson Homes	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	25,910	25,910	504 Unit Modification/Fair Housing
003	Richard Allen	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	7,631	7,631	504 Unit Modification/Fair Housing
010	Raymond Rosen	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	9,893	9,893	504 Unit Modification/Fair Housing
013	Wilson Park	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	2,760	2,760	504 Unit Modification/Fair Housing
014	Norris Apts	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	4,911	4,911	504 Unit Modification/Fair Housing
015	Harrison Plaza	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	52,998	52,998	504 Unit Modification/Fair Housing
018	Arch Homes	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	854	854	504 Unit Modification/Fair Housing
020	Soring Garden Apts	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	2,288	2,288	504 Unit Modification/Fair Housing
029	Hill Creek	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	1,034	1,034	504 Unit Modification/Fair Housing
030	Abbottsford	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	23,868	23,868	504 Unit Modification/Fair Housing
031	Bartram Village	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	32,574	32,574	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: PA26P00250115							2015
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
032	Oxford Village	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	444	444	504 Unit Modification/Fair Housing
034	Whitehall	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	13,231	13,231	504 Unit Modification/Fair Housing
039	West Park Apts	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	1,121	1,121	504 Unit Modification/Fair Housing
042	Champlost Home	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	2,940	2,940	504 Unit Modification/Fair Housing
046	Haverford Homes	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	1,852	1,852	504 Unit Modification/Fair Housing
049	Morton Homes	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	9,605	9,605	504 Unit Modification/Fair Housing
050	Blumberg	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing
054	Parkview	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing
055	Fairhill Apts	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	6,232	6,232	504 Unit Modification/Fair Housing
063	Katie B. Jackosn	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	2,219	2,219	504 Unit Modification/Fair Housing
066	Holmecrest	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing
076	Emlen Arms	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	4,282	4,282	504 Unit Modification/Fair Housing
077	Bentley Hall	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing
079	Plymouth Hall	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	508	508	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: PA26P00250115							2015
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
114	Gladys B. Jacobs	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	0	0	504 Unit Modification/Fair Housing
139	GGFE I	701098	504 Unit Modification/Fair Housing	1492	Varies	0.00	0.00	434	434	504 Unit Modification/Fair Housing
901	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	27,992	27,992	504 Unit Modification/Fair Housing
902	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	133,548	133,548	504 Unit Modification/Fair Housing
903	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	6,844	6,844	504 Unit Modification/Fair Housing
904	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	29,982	29,982	504 Unit Modification/Fair Housing
905	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	45,498	45,498	504 Unit Modification/Fair Housing
906	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	55,772	55,772	504 Unit Modification/Fair Housing
907	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	76,472	76,472	504 Unit Modification/Fair Housing
908	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	6,571	6,571	504 Unit Modification/Fair Housing
909	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	7,491	7,491	504 Unit Modification/Fair Housing
910	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1492	Varies	25,000.00	25,000.00	3,620	3,620	504 Unit Modification/Fair Housing
			Total PHA-Wide Dwelling Unit Improvements			8,815,000.00	3,599,558	4,298,622	3,772,001	
			<u>Scattered Sites Dwelling Unit Renovation</u>							

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 HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
901	Haddington	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	100,000	3,016	3,016	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
902	Mantua	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	100,000	29,422	29,422	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
903	Kingsessing	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	582,054	13,675	13,675	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
904	Germantown/Hunting Park	700460	Comprehensive Scattered Sites Unit Rehab	1492	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
905	Fairhill Square	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	75,000	7,449	7,449	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	1492	Varies	600,000.00	630,676	562,030	559,032	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	1492	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



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 HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
908	Susquehanna	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	25,000	5,890	4,040	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	1492	Varies	600,000.00	1,344,379	712,426	703,386	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
910	Oxford Jefferson	700460	Comprehensive Scattered Sites Unit Rehab	1492	Varies	600,000.00	842,891	810,591	807,298	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
401401	Major Systems	701309	Comprehensive Unit MOD	1492	Varies	0.00	170,000	0	0	Scattered Sites Modernization Program
901	Haddington	701309	Comprehensive Unit MOD	1492	Varies	0.00	540,000	456,425	456,425	Scattered Sites Modernization Program
902	Mantua	701309	Comprehensive Unit MOD	1492	Varies	0.00	320,000	272,658	112,367	Scattered Sites Modernization Program
903	Kingsessing	701309	Comprehensive Unit MOD	1492	Varies	0.00	427,567	392,676	392,676	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: PA26P00250115							2015
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
904	Germantown/Hunting Park	701309	Comprehensive Unit MOD	1492	Varies	0.00	523,000	457,107	457,197	Scattered Sites Modernization Program
905	Fairhill Square	701309	Comprehensive Unit MOD	1492	Varies	0.00	641,762	641,762	323,332	Scattered Sites Modernization Program
907	Ludlow	701309	Comprehensive Unit MOD	1492	Varies	0.00	588,577	595,437	193,030	Scattered Sites Modernization Program
908	Susquehanna	701309	Comprehensive Unit MOD	1492	Varies	0.00	653,917	564,448	139,639	Scattered Sites Modernization Program
910	Oxford Jefferson	701309	Comprehensive Unit MOD	1492	Varies	0.00	61,321	61,321	0	Scattered Sites Modernization Program
010	Raymond Rosen	701431	Vacant Unit Rehab Program	1492	Varies	0.00	4,821	4,821	4,821	Conventional Sites Modernization Program
013	Wilson Park	701431	Vacant Unit Rehab Program	1492	Varies	0.00	7,644	7,644	7,644	Conventional 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: PA26P00250115							2015
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
014	Norris Apts	701431	Vacant Unit Rehab Program	1492	Varies	0.00	952	952	952	Conventional Sites Modernization Program
015	Harrison Plaza	701431	Vacant Unit Rehab Program	1492	Varies	0.00	321	321	321	Conventional Sites Modernization Program
031	Bartram Village	701431	Vacant Unit Rehab Program	1492	Varies	0.00	525	525	525	Conventional Sites Modernization Program
032	Oxford Village	701431	Vacant Unit Rehab Program	1492	Varies	0.00	293	293	293	Conventional Sites Modernization Program
034	Whitehall	701431	Vacant Unit Rehab Program	1492	Varies	0.00	700	700	700	Conventional Sites Modernization Program
042	Champlost Home	701431	Vacant Unit Rehab Program	1492	Varies	0.00	293	293	293	Conventional Sites Modernization Program
049	Morton Homes	701431	Vacant Unit Rehab Program	1492	Varies	0.00	259	259	259	Conventional 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: PA26P00250115							2015
Development Number / Name HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
055	Fairhill Apts	701431	Vacant Unit Rehab Program	1492	Varies	0.00	826	826	826	Conventional Sites Modernization Program
901	Haddington	701095	HVAC Upgrades	1492	Varies	100,000.00	73,480	0	0	As needed HVAC upgrades for Scattered Sites
902	Mantua	701095	HVAC Upgrades	1492	Varies	0.00	3,760	3,760	2,366	As needed HVAC upgrades for Scattered Sites
903	Kingsessing	701095	HVAC Upgrades	1492	Varies	0.00	7,520	7,520	6,075	As needed HVAC upgrades for Scattered Sites
905	Fairhill Square	701095	HVAC Upgrades	1492	Varies	0.00	3,860	3,860	2,609	As needed HVAC upgrades for Scattered Sites
906	Francisville	701095	HVAC Upgrades	1492	Varies	0.00	7,620	7,620	3,585	As needed HVAC upgrades for Scattered Sites
908	Susquehanna	701095	HVAC Upgrades	1492	Varies	0.00	3,760	3,760	2,563	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 HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
902	Mantua	700291	Exterior Building Structures	1492	Varies	246,610.00	246,610	243,416	124,214	Repair Exterior Bays as needed in Scattered Sites
901	Haddington	700374	Concrete & Sidewalk Replacement	1492	Vsries	0.00	40,000	40,000	40,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sies
902	Mantua	700374	Concrete & Sidewalk Replacement	1492	Vsries	0.00	40,000	40,000	40,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sies
903	Kingsessing	700374	Concrete & Sidewalk Replacement	1492	Vsries	0.00	100,000	100,000	100,001	Replace/Repair Concrete Sidewalks as needed in Scattered Sies
904	Germantown/Hunting Park	700374	Concrete & Sidewalk Replacement	1492	Vsries	0.00	50,000	50,000	50,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sies
905	Fairhill Square	700374	Concrete & Sidewalk Replacement	1492	Vsries	0.00	70,000	70,000	70,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sies
906	Francisville	700374	Concrete & Sidewalk Replacement	1492	Vsries	0.00	40,000	40,000	40,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sies

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 HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
907	Ludlow	700374	Concrete & Sidewalk Replacement	1492	Vsries	0.00	100,000	100,000	100,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sies
908	Susquehanna	700374	Concrete & Sidewalk Replacement	1492	Vsries	0.00	40,000	40,000	40,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sies
909	Strawberry Mansion	700374	Concrete & Sidewalk Replacement	1492	Vsries	0.00	80,000	80,000	80,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sies
909	Strawberry Mansion	700374	Concrete & Sidewalk Replacement	1492	Vsries	600,000.00	40,000	37,729	40,000	Replace/Repair Concrete Sidewalks as needed in Scattered Sies
			Scattered Site Unit Renovation Total		235 units	6,946,610.00	8,589,386.50	6,470,631.92	4,960,030.99	
			Total Dwelling Structures	1492		15,761,610.00	12,188,944.69	10,769,253.91	8,732,032.07	
			<u>Non-Dwelling Structures</u>	1492						
900150	Lucien Blackwell LP	701507	Non-Dwelling Structures	1492	1 LS	2,500,000.00	0	0	0	Construction of Community Center at Lucien Blackwell Home
050	Blumberg	701069	Infrastruture	1492	1 LS	0.00	8,934,134	8,934,134	239,564	Regrid of Streets around the Blumberg Development
			Total Non-Dwelling Structures	1492		2,500,000.00	8,934,134.00	8,934,134.00	239,564.38	
			<u>Non-Dwelling Equipment</u>							

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 HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
707707	Budget	700798	Community Space F & EM	1492	1LS	25,000.00	25,000	0	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	1492	1 LS	250,000.00	250,000	6,398	5,007	The purchase of 200 replacement computers throughout PHA. Also includes server and network upgrades/replacements,
709709	ISM	700614	Telephone Infrastructure Upgrades	1492	1 LS	100,000.00	100,000	22,433	22,433	Telephone equipments including but not limited to network switches and IVR upgrades
455455	Housing Operations Specialty Crew	701203	Maintenance Equipment	1492	1 LS	100,000.00	100,000	0	0	repair/replace maintenance equipment including but not limited to landscaping, snow removal and small construciton equipment. To be used through
			Total Non-Dwelling Equipment	1492		475,000.00	475,000	28,831	27,440	
401401	Housing Operations	700882	Demolition	1492	1 LS	0.00	0	0	0	Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspectors
			Total Demolition	1492		0.00	0	0	0	
401401	Housing Operations	700854	Relocation	1492	1 LS	0.00	0	29,760	29,760	Relocations as needed through out PHA.
			Total Relocation	1492		0.00	0	29,760	29,760	
			Total Development	1492		0.00	0	0	0	
700700	Finance	701491	Bond Debt Service - Principle	1501	1 LS	6,127,500.00	6,127,500	4,815,000	4,815,000	bond debt principle payment for Tasker Bond
700700	Finance	701498	Bond Debt Service - Interest	1501	1 LS	1,172,106.25	1,172,106	1,312,500	1,312,500	bond debt interest payment for Tasker Bond
			Total Debt Service	1501		7,299,606.25	7,299,606	6,127,500	6,127,500	

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 HA-Wide Activities		Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised Budget	Obilgated	Expended	Comments
			GRAND TOTAL			36,995,848.00	36,998,196	33,155,172	21,629,988	



PHILADELPHIA HOUSING AUTHORITY  
ANNUAL STATEMENT/PERFORMANCE AND EVALUATION  
REPORT  
FEDERAL FISCAL YEAR 2016

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 Reserve for Disasters/Emergencies Performance and Evaluation Report for Program Year Ending:		Revised Annual Statement (Revision No: 2 ) Final Performance and Evaluation Report			
Line No.	Summary by Development Account	Total Estimated Cost			
		Original Budget	Revised Budget	Obligated	Expended
1	Total Non-CFP Funds				
2	1406 Operations			0.00	0.00
3	1408 Management Improvements			0.00	0.00
4	1410 Administrative Costs			3,740,838.41	3,740,838.41
5	1411 Audit			0.00	0.00
6	1415 Liquidated Damages			0.00	0.00
7	1430 Fees and Costs			2,587,947.41	581,048.54
8	1440 Site Acquisition			0.00	0.00
9	1450 Site Improvements			0.00	0.00
10	1460 Dwelling Structures			11,373,348.92	4,868,795.53
11	1465.1 Dwelling Equipment-Nonexpendable			0.00	0.00
12	1470 Non-Dwelling Space			0.00	0.00
13	1475 Non-Dwelling Equipment			67,848.31	54,312.56
14	1485 Demolition			79,675.00	79,675.00
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration	30,843,438.00	30,843,438.00	0.00	0.00
17	1495 Relocation			148,766.00	129,106.00
18	1499 Development Activities			1,200,000.00	640,801.00
19	1501 Collateralization or Debt Service	7,428,212.00	7,428,212.00	7,298,625.25	7,298,625.25
20	1502 Contingency				
21	Amount of Annual Grant (Sum of lines 2-20)	38,271,650.00	38,271,650.00	26,497,049.30	17,393,202.29
22	Amount of Line 21 Related to LBP Activities				
23	Amount of Line 21 Related to Section 504 Compliance	0.00	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			
	Kelvin A. Jeremiah, President & Chief Exexutive 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				
						Original	Revised Budget	Obilgated	Expended	Comments
701701	Finance	701100	Operating Subsidy	1406		0.00	0		0	
			Total Operating Subsidy Cost	1406		0.00	0	0	0	
			Management Improvements							
709709	ISM	700176	Computer Software Acquisition,Production Support,Customization,and Program Implementation	1408			0		0	PHA wide system support, upgrades, implemetations.
			Total Management Improvement Cost	1408		0.00	0	0	0	
			Administrative Costs							
000	PHA-Wide	700183	Administrative Salaries and Benefits	1410		3,827,165.00	3,827,165	3,740,838	3,740,838	Administrative Salaries and Benefits
			Total Administrative Cost	1410		3,827,165.00	3,827,165	3,740,838	3,740,838	
			Fees and Costs							
800800	Development	700185	A&E, Legal and Consultant Services	1430		1,000,000.00	459,856	518,859	15,569	pre-development and design cost
001	Johnson Homes	700185	A&E, Legal and Consultant Services	1430		0.00	29,773	29,773	0	pre-development and design cost
014	Norris Homes	700185	A&E, Legal and Consultant Services	1430		0.00	2,500	2,500	2,500	pre-development and design cost
030	Abbottsford Homes	700185	A&E, Legal and Consultant Services	1430		0.00	94,093	0	0	pre-development and design cost
035	Haddington Homes	700185	A&E, Legal and Consultant Services	1430		0.00	94,093	0	0	pre-development and design cost
050	Blumberg	700185	A&E, Legal and Consultant Services	1430		0.00	1,578,980	1,578,980	327,445	pre-development and design cost
055	Fairhill Apts	700185	A&E, Legal and Consultant Services	1430		0.00	121,358	121,358	0	pre-development and design cost
093	Westpark Plaza	700185	A&E, Legal and Consultant Services	1430		0.00	69,575	0	0	pre-development and design cost
104	Arlene Homes	700185	A&E, Legal and Consultant Services	1430		0.00	80,827	0	0	pre-development and design cost
179	Queen Lane	700185	A&E, Legal and Consultant Services	1430		0.00	45,000	45,000	45,000	pre-development and design cost

Annual Statement/Performance and Evaluation Report:										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
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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				
						Original	Revised Budget	Obilgated	Expended	Comments
209	North Central CNI	700185	A&E, Legal and Consultant Services	1430		0.00	99,200	99,200	0	pre-development and design cost
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
001	Johnson Homes	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	15,750	7,891	7,891	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
010	Raymond Rosen	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	16,779	16,779	16,779	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
013	Wilson Park	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	22,631	22,631	22,631	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
015	Harrison Plaza	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	8,028	4,458	4,458	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
018	Arch Homes	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	4,284	4,284	4,284	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
020	Spring Garden	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	3,570	3,213	3,213	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
029	Hill Creek	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	9,282	5,355	5,355	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
031	Bartram Village	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	20,550	20,550	20,550	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
032	Oxford Village	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	5,355	2,856	2,856	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
034	Whitehall	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	6,426	4,641	4,641	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
035	Haddington Homes	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	3,570	2,142	2,142	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
039	Westpark Apts	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	17,325	17,325	15,582	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
046	Haverford Homes	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	1,785	714	714	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
049	Morton Homes	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	5,355	2,142	2,142	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
055	Fairhill Apts	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	988	988	988	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
063	Katie B. Jackson	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	3,525	3,525	3,525	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
093	Westpark Plaza	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	3,570	1,071	1,071	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations

Annual Statement/Performance and Evaluation Report:										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
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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				
						Original	Revised Budget	Obligated	Expended	Comments
901	Haddington	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	16,984	11,986	11,986	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
902	Mantua	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	12,495	8,925	8,925	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
903	Kingsessing	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	5,355	1,071	1,071	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
904	Germantown/Hunting Park	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	5,547	5,547	5,547	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
905	Fairhill Square	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	11,335	5,623	5,623	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
906	Francisville	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	8,925	4,606	4,606	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
907	Ludlow	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	10,537	10,537	10,537	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
908	Susquehanna	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	18,925	16,277	16,277	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
909	Strawberry Mansion	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	7,140	5,712	5,712	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
910	Oxford/Jefferson	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		0.00	5,712	1,428	1,428	To Address as needed LBP Testing and Asbestos Monitoring at various PHA Locations
			Total Professional Services Costs and Fees	1430		1,000,000.00	2,926,983	2,587,947	581,049	
			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
001	Johnson Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	19,137	18,165	17,618	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
003	Richard Allen	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	5,478	3,799	3,799	
010	Raymond Rosen	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	24,012	24,012	11,560	

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				
						Original	Revised Budget	Obligated	Expended	Comments
013	Wilson Park	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	41,080	41,080	18,170	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
014	Norris Apts.	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	4,673	3,717	3,604	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
015	Harrison Plaza	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	17,665	13,221	12,697	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
018	Arch Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	1,038	711	711	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
020	Spring Garden	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	7,071	3,816	3,816	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
024	Queen Lane	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	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 accomodations.
029	Hill Creek	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	17,040	17,040	13,636	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
030	Abbottsford Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	14,227	14,227	14,123	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
032	Oxford Village	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	18,710	15,741	15,677	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
034	Whitehall	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	14,944	14,944	1,524	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
035	Haddington Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	20,931	19,985	12,629	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
042	Champlost Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	5,997	4,070	3,983	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
046	Haverford Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	1,000	22	22	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
049	Morton Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	21,940	21,940	7,919	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
050	Blumberg	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	1,038	667	667	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
055	Fairhill Apts.	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	3,115	2,003	2,003	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
065	Collegeview	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	10,025	9,286	2,376	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
100	Cecil B. Moore Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	519	334	334	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
104	Herbert Arlene Homes	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	3,974	3,789	3,789	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.

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				
						Original	Revised Budget	Obligated	Expended	Comments
901	Haddington	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	34,696	34,335	17,692	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
902	Mantua	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	25,637	19,790	13,650	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
903	Kingsessing	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	42,307	40,477	35,543	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
904	Germantown/Hunting Park	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	29,162	26,022	20,418	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
905	Fairhill Square	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	32,466	30,503	23,128	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
906	Francisville	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	58,146	54,765	49,864	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
907	Ludlow	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	44,103	43,752	36,880	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
908	Susquehanna	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	31,476	24,746	22,921	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
909	Strawberry Mansion	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	41,089	38,381	33,184	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
910	Oxford Jefferson	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	Varies	0.00	21,119	16,015	13,766	Annual inspections will be about \$150,000 for the inspection of 500 chair lifts and \$130,000 of repairs to various sites for 504 accomodations.
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 accomodations.
			Total PHA-Wide Site Improvements			0.00	617,269.28	564,809.37	421,157.53	
049	Morton Homes	700992	Landscaping, Tree Trimming	1450	Varies	0.00	20,664	20,664	0	Tree trimming and Cutting Site- Wide
903	Kingsessing	700992	Landscaping, Tree Trimming	1450	Varies	0.00	1,204	1,204	0	Tree trimming and Cutting Site- Wide
013	Wilson Park	701078	Doors Including Storms	1450	Varies	0.00	8,097	8,097	5,597	Repair/Replace Exterior Entry Doors as needed
076	Emlen Arms	701078	Doors Including Storms	1450	Varies	0.00	4,000	4,000	0	Repair/Replace Exterior Entry Doors as needed
079	Plymouth Hall	701078	Doors Including Storms	1450	Varies	0.00	2,000	2,000	0	Repair/Replace Exterior Entry Doors as needed
114	Gladys B. Jacobs	701078	Doors Including Storms	1450	Varies	0.00	2,500	2,500	0	Repair/Replace Exterior Entry Doors as needed
039	West Park Apts	701090	Fire Safety	1450	Varies	0.00	4,125	4,125	0	Repair Sprinklrr System as needed

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				
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905	Germantown/Hunting Park	701098	504 Unit Modification	1450	Varies	0.00	1,768	0	0	Handicapped Unit Repairs as needed
908	Susquehanna	701098	504 Unit Modification	1450	Varies	0.00	2,187	0	0	Handicapped Unit Repairs as needed
039	West Park Apts	701165	Elevator Upgrades	1450	Varies	0.00	623,042	623,042	0	Repair Elevators Cabs at Busti Street
039	West Park Apts	701166	Heating Plant Upgrades	1450	Varies	0.00	1,498,403	1,496,403	79,582	Replace Risers in High-Rise Buildings
050	Blumberg	701246	Carpentry Materials	1450	Varies	0.00	1,000	0	0	Unit Repairs as needed
093	Westpart Plaza	701434	Roof Repair/Replacement	1450	Varies	0.00	89,650	89,650	0	Repair Roof at Westpark Plaza
			Total Site Improvements	1450		0.00	2,875,909	2,816,494	506,337	
			<u>PHA Wide Dwelling Structures</u>							
039	West Park Apts	701165	Elevator Repairs	1460	1 LS	0.00	0			Replace Elevator System in all 3 High Rises at West Park Apartments
029	Hill Creek	701434	Roof Repair/Replacement	1460	Varies					Replace roofs as needed
063	Katie B. Jackosn	701434	Roof Repair/Replacement	1460	Varies					Replace roofs as needed
076	Emlen Arms	701434	Roof Repair/Replacement	1460	Varies					Replace roofs as needed
093	Westpart Plaza	701434	Roof Repair/Replacement	1460	Varies					Replace roofs as needed
020	Spring Garden Apartments	701166	Heating Plant Upgrades	1460	Varies					Upgrade the Primary Site Heating System at Spring Garden Apartments
029	Hill Creek	701166	Heating Plant Upgrades	1460	Varies					Upgrade the Primary Site Heating System at Hill Creek Apartments
001	Johnson Homes	700454	Comp Unit MOD SMART II	1460	Varies	0.00	67,026	59,454	20,427	Comprehensive Unit Modernization
013	Wilson Park	700454	Comp Unit MOD SMART II	1460	Varies	0.00	147,973	107,682	9,328	Comprehensive Unit Modernization
015	Harrison Plaza	700454	Comp Unit MOD SMART II	1460	Varies	0.00	61,692	49,325	3,094	Comprehensive Unit Modernization
018	Arch Homes	700454	Comp Unit MOD SMART II	1460	Varies	0.00	64,189	50,964	9,414	Comprehensive Unit Modernization



Annual Statement/Performance and Evaluation Report:										
Capital Fund Program (CFP)										
Part II: Supporting Pages										
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Philadelphia Housing Authority			Capital Fund Program Grant No:		PA26P00250116					2016
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020	Spring Garden Apartments	700454	Comp Unit MOD SMART II	1460	Varies	0.00	227,808	203,312	61,561	Comprehensive Unit Modernization
029	Hill Creek	700454	Comp Unit MOD SMART II	1460	Varies	0.00	208,985	166,061	31,937	Comprehensive Unit Modernization
034	Whitehall	700454	Comp Unit MOD SMART II	1460	Varies	0.00	160,447	126,446	20,812	Comprehensive Unit Modernization
035	Haddington Homes	700454	Comp Unit MOD SMART II	1460	Varies	0.00	63,010	50,840	19,515	Comprehensive Unit Modernization
039	West Park Apts	700454	Comp Unit MOD SMART II	1460	Varies	0.00	135,435	100,574	4,619	Comprehensive Unit Modernization
042	Champlost Homes	700454	Comp Unit MOD SMART II	1460	Varies	0.00	65,527	50,000	0	Comprehensive Unit Modernization
076	Emlen Arms	700454	Comp Unit MOD SMART II	1460	Varies	0.00	70,527	59,817	13,187	Comprehensive Unit Modernization
077	Bentley Hall	700454	Comp Unit MOD SMART II	1460	Varies	0.00	101,280	69,756	0	Comprehensive Unit Modernization
901	Haddington	700454	Comp Unit MOD SMART II	1460	Varies	0.00	646,694	532,858	267,043	Comprehensive Unit Modernization
902	Mantua	700454	Comp Unit MOD SMART II	1460	Varies	0.00	801,875	658,168	213,599	Comprehensive Unit Modernization
903	Kingsessing	700454	Comp Unit MOD SMART II	1460	Varies	0.00	422,487	369,933	217,374	Comprehensive Unit Modernization
904	Germantown/Hunting Park	700454	Comp Unit MOD SMART II	1460	Varies	0.00	570,437	466,909	270,140	Comprehensive Unit Modernization
905	Fairhill Square	700454	Comp Unit MOD SMART II	1460	Varies	0.00	990,415	897,602	655,134	Comprehensive Unit Modernization
907	Ludlow	700454	Comp Unit MOD SMART II	1460	Varies	0.00	241,531	223,701	140,777	Comprehensive Unit Modernization
010	Raymond Rosen	700460	Comp Unit MOD SMART II	1460	Varies	0.00	586	0	0	Comprehensive Unit Modernization
031	Bartram Village	700878	Plumbing Upgrades	1460	Varies	0.00	3,188	3,188	3,188	Replace waste water piping throughout Site
065	Collegeview	700878	Plumbing Upgrades	1460	Varies					Replace waste water piping throughout Site
001	Johnson Homes	700878	Plumbing Upgrades	1460	Varies					Install/Replace Tub Diverter system throught units at Mount Olivet LP
138	Mount Olivet LP	700878	Plumbing Upgrades	1460	Varies					Install/Replace Tub Diverter system throught units at Mount Olivet LP

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				
						Original	Revised Budget	Obligated	Expended	Comments
039	West Park Apts	700465	Trash Compactors	1460	3					Replace Trash Compactors in the 3 High Rises at West Park Apts
049	Morton Homes	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 conduite and cable from main panel to
020	Spring Garden Apartments	701166	Heating Plant Upgrade	1460	1 LS	0.00	2,554,326	2,115,020	480,859	Pipe Replacement at Spring Garden Apts.
024	Queen Lane	701060	Comprehensive Unit Modernization	1460	Varies	0.00	1,213,244	522,807	308,415	Renovation of Queen Lane Low Rent Units
003	Richard Allen	701431	Vacant Unit Rehab Program	1460	Varies	0.00	21,620	4,050	4,050	Renovation of Vacant Housing Units
010	Raymond Rosen	701431	Vacant Unit Rehab Program	1460	Varies	0.00	20,000	5,110	5,696	Renovation of Vacant Housing Units
013	Wilson Park	701431	Vacant Unit Rehab Program	1460	Varies	0.00	10,000	1,268	1,268	Renovation of Vacant Housing Units
014	Norris Apts.	701431	Vacant Unit Rehab Program	1460	Varies	0.00	10,000	2,856	2,856	Renovation of Vacant Housing Units
015	Harrison Plaza	701431	Vacant Unit Rehab Program	1460	Varies	0.00	5,000	1,549	1,549	Renovation of Vacant Housing Units
029	Hill Creek	701431	Vacant Unit Rehab Program	1460	Varies	0.00	4,000	873	873	Renovation of Vacant Housing Units
031	Bartram Village	701431	Vacant Unit Rehab Program	1460	Varies	0.00	9,000	3,665	3,665	Renovation of Vacant Housing Units
034	Whitehall	701431	Vacant Unit Rehab Program	1460	Varies	0.00	4,000	1,119	1,119	Renovation of Vacant Housing Units
042	Champlost Homes	701431	Vacant Unit Rehab Program	1460	Varies	0.00	4,000	879	879	Renovation of Vacant Housing Units
001	Johnson Homes	701309	Comprehensive Unit Modernization	1460	Varies	0.00	304,034	304,034	0	Modernization of Housing Units
015	Harrison Plaza	701309	Comprehensive Unit Modernization	1460	Varies	0.00	12,470	12,470	0	Modernization of Housing Units
029	Hill Creek	701309	Comprehensive Unit Modernization	1460	Varies	0.00	207,401	207,401	0	Modernization of Housing Units
901	Haddingtom	701309	Comprehensive Unit Modernization	1460	Varies	0.00	229,455	229,455	0	Modernization of Housing Units
902	Mantua	701309	Comprehensive Unit Modernization	1460	Varies	0.00	138,618	138,618	0	Modernization of Housing Units
903	Kingessing	701309	Comprehensive Unit Modernization	1460	Varies	0.00	304,301	304,301	0	Modernization of Housing Units

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				
						Original	Revised Budget	Obilgated	Expended	Comments
904	Germantown/Hunting Park	701309	Comprehensive Unit Modernization	1460	Varies	0.00	71,968	71,968	0	Modernization of Housing Units
906	Francisville	701309	Comprehensive Unit Modernization	1460	Varies	0.00	146,690	146,690	0	Modernization of Housing Units
907	Ludlow	701309	Comprehensive Unit Modernization	1460	Varies	0.00	241,851	241,851	0	Modernization of Housing Units
908	Susquehanna	701309	Comprehensive Unit Modernization	1460	Varies	0.00	246,299	246,299	0	Modernization of Housing Units
909	Strawberry Mansion	701309	Comprehensive Unit Modernization	1460	Varies	0.00	140,262	140,262	0	Modernization of Housing Units
910	Oxford Jefferson	701309	Comprehensive Unit Modernization	1460	Varies	0.00	155,318	155,318	0	Modernization of Housing Units
055	Fairhill Apts.	701090	Fire Safety	1460	Varies	0.00	34,905	34,905	0	Replace Fire Detection Equipment
001	Johnson Homes	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	2,800	2,675	724	504 Unit Modification/Fair Housing
003	Richard Allen	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
010	Raymond Rosen	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	4,986	4,895	4,235	504 Unit Modification/Fair Housing
013	Wilson Park	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	1,500	1,591	1,533	504 Unit Modification/Fair Housing
014	Norris Apts	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
015	Harrison Plaza	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	4,589	3,741	3,741	504 Unit Modification/Fair Housing
018	Arch Homes	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
020	Soring Garden Apts	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	2,000	1,293	1,287	504 Unit Modification/Fair Housing
029	Hill Creek	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
030	Abbottsford	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	4,354	4,269	2,848	504 Unit Modification/Fair Housing
031	Bartram Village	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	6,000	5,352	5,352	504 Unit Modification/Fair Housing
032	Oxford Village	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	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: PA26P00250116							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	Obilgated	Expended	Comments
034	Whitehall	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	2,100	2,038	1,983	504 Unit Modification/Fair Housing
039	West Park Apts	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
042	Champlost Home	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
046	Haverford Homes	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
049	Morton Homes	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	3,000	1,470	185	504 Unit Modification/Fair Housing
050	Blumberg	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
054	Parkview	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
055	Fairhill Apts	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	1,600	1,452	1,452	504 Unit Modification/Fair Housing
063	Katie B. Jackosn	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
066	Holmecrest	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
076	Emlen Arms	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	354	354	0	504 Unit Modification/Fair Housing
077	Bentley Hall	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
079	Plymouth Hall	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	0	0	0	504 Unit Modification/Fair Housing
093	Westpart Plaza	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	1,100	0	0	504 Unit Modification/Fair Housing
104	Herbert Arlene Homes	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	2,100	1,701	0	504 Unit Modification/Fair Housing
901	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	4,293	3,794	3,552	504 Unit Modification/Fair Housing
902	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	2,748	2,581	1,733	504 Unit Modification/Fair Housing
903	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	2,000	1,811	1,800	504 Unit Modification/Fair Housing
904	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	2,442	2,410	2,406	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:	PA26P00250116						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
905	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	1,800	1,811	1,800	504 Unit Modification/Fair Housing
906	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	2,800	2,757	2,757	504 Unit Modification/Fair Housing
907	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	7,479	7,452	6,035	504 Unit Modification/Fair Housing
908	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	600	587	587	504 Unit Modification/Fair Housing
909	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	2,800	2,693	2,329	504 Unit Modification/Fair Housing
910	Scattered Sitees	701098	504 Unit Modification/Fair Housing	1460	Varies	0.00	4,100	3,836	3,813	504 Unit Modification/Fair Housing
			Total PHA-Wide Dwelling Unit Improvements			0.00	11,207,419	9,199,922	2,822,528	
			Scattered Sites Dwelling Unit Renovation							
901	Haddington	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000.00	3,016	1,885	1,508	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
902	Mantua	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000.00	82,302	44,895	41,843	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
903	Kingsessing	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000.00	3,688	2,305	1,844	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
904	Germantown/Hunting Park	700460	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
905	Fairhill Square	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000.00	530,180	377,507	365,694	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)										
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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				
						Original	Revised Budget	Obligated	Expended	Comments
906	Francisville	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000.00	1,034,607	252,445	233,177	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	285,728	158,263	149,018	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	1,502,858	820,269	774,053	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	790,691	269,837	253,319	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
910	Oxford Jefferson	700460	Comprehensive Scattered Sites Unit Rehab	1460	Varies	600,000.00	690,635	243,498	223,289	Major Interior structural work on various scattered sites units including walls, floor joists, mechanical repairs, kitchens and bathrooms
901	Haddington	701095	HVAC Upgrades	1460	Varies					As needed HVAC upgrades for Scattered Sites
904	Germantown/Hunting Park	700291	Exterior Building Structures	1460	Varies	0.00	352	352	352	Repair Exterior Bays as needed in Scattered Sites
013	Wilson Park	700292	Doors and Windows	1460	Varies	0.00	2,171	2,171	2,171	Replace Broken Windows at Wilson Park
909	Strawberry Mansion	700374	Concrete & Sidewalk Replacement	1460	Vsries					Replace/Repair Concrete Sidewalks as needed in Scattered Sies
			Scattered Site Unit Renovation Total		235 units	6,000,000.00	4,926,228	2,173,427	2,046,268	
			Total Dwelling Structures	1460		6,000,000.00	16,133,647	11,373,349	4,868,796	

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				
						Original	Revised Budget	Obligated	Expended	Comments
			<b><u>Non-Dwelling Structures</u></b>	<b>1470</b>						
900150	Lucien Blackwell LP	701507	Non-Dwelling Structures	1470	1 LS					Construction of Community Center at Lucien Blackwell Home
			<b>Total Non-Dwelling Structures</b>	<b>1470</b>		<b>0.00</b>	<b>0</b>			
			<b><u>Non-Dwelling Equipment</u></b>							
707707	Budget	700798	Community Space F & EM	1475	1LS	25,000.00	25,000	0	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	250,000	55,746	43,954	The purchase of 200 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
013	Wilson Park	701203	Community Space F & EM	1475	1 LS	0.00	10,358	10,358	10,358	As needed replacement of office equipment at Wilson Park
035	Haddington Homes	701203	Maintenance Equipment	1475	1 LS	0.00	675	0	0	Maintenance Equipment Purchases at Haddington Homes
455455	Housing Operations Specialty Crew	701203	Maintenance Equipment	1475	1 LS	100,000.00	199,871	1,744	0	repair/replace maintenance equipment including but not limited to landscaping, snow removal and small construcion equipment. To be used through out PHA's
			<b>Total Non-Dwelling Equipment</b>	<b>1475</b>		<b>475,000.00</b>	<b>485,904</b>	<b>67,848</b>	<b>54,313</b>	
902	Mantua	700882	Demolition	1485	1 LS	0.00	37,185	37,185	37,185	Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspectors
909	Strawberry Mansion	700882	Demolition	1485	1 LS	0.00	42,490	42,490	42,490	Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspectors
401401	Housing Operations	700882	Demolition	1485	1 LS	0.00	0			Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspectors
			<b>Total Demolition</b>	<b>1485</b>		<b>0.00</b>	<b>79,675</b>	<b>79,675</b>	<b>79,675</b>	
079	Plymouth Hall	700156	Evaluate Strategic Plan	1492	Various	0.00	3,000,000	0	0	Funding for Capital Projects At Plymouth Hall
707707	Budget Office	700156	Evaluate Strategic Plan	1492	Various	19,541,273.00	103,972			Funding for Capital Projects To Be Determined
			<b>Total MTW Demonstration</b>	<b>1492</b>		<b>19,541,273.00</b>	<b>3,103,972.45</b>	<b>0.00</b>	<b>0.00</b>	

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				
						Original	Revised Budget	Obilgated	Expended	Comments
024	Queen Lane	701060	Comp Unit Modernization	1495	Varies	0.00	52,402	0	0	Temporary Relocaion while Queen Lane Units are Rehabbed
001	Johnson Homes	700854	Relocation	1495	1 LS	0.00	3,779	3,779	3,779	Relocations as needed through out PHA.
003	Richard Allen	700854	Relocation	1495	1 LS	0.00	4,216	4,216	4,216	Relocations as needed through out PHA.
010	Raymond Rosen	700854	Relocation	1495	1 LS	0.00	2,585	2,585	2,585	Relocations as needed through out PHA.
013	Wilson Park	700854	Relocation	1495	1 LS	0.00	9,073	9,073	6,431	Relocations as needed through out PHA.
014	Norris Apts.	700854	Relocation	1495	1 LS	0.00	19,662	19,662	12,337	Relocations as needed through out PHA.
018	Arch Homes	700854	Relocation	1495	1 LS	0.00	1,263	1,263	1,263	Relocations as needed through out PHA.
024	Queen Lane	700854	Relocation	1495	1 LS	0.00	2,792	2,792	1,379	Relocations as needed through out PHA.
029	Hill Creek	700854	Relocation	1495	1 LS	0.00	2,506	2,506	2,506	Relocations as needed through out PHA.
031	Bartram Village	700854	Relocation	1495	1 LS	0.00	2,400	2,400	2,400	Relocations as needed through out PHA.
034	Whitehall	700854	Relocation	1495	1 LS	0.00	1,379	1,379	1,379	Relocations as needed through out PHA.
035	Haddington Homes	700854	Relocation	1495	1 LS	0.00	1,161	1,161	0	Relocations as needed through out PHA.
039	Westpark Apts.	700854	Relocation	1495	1 LS	0.00	1,074	1,074	1,074	Relocations as needed through out PHA.
042	Champlost Homes	700854	Relocation	1495	1 LS	0.00	1,127	1,127	1,127	Relocations as needed through out PHA.
049	Morton Homes	700854	Relocation	1495	1 LS	0.00	1,201	1,201	1,201	Relocations as needed through out PHA.
050	Blumberg	700854	Relocation	1495	1 LS	0.00	62,704	57,556	51,763	Relocations as needed through out PHA.
062	Cassie B. Holley	700854	Relocation	1495	1 LS	0.00	3,727	3,727	3,727	Relocations as needed through out PHA.
063	Katie B. Jackson	700854	Relocation	1495	1 LS	0.00	4,094	4,094	4,094	Relocations as needed through out PHA.



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				
						Original	Revised Budget	Obilgated	Expended	Comments
066	Holmecrest Homes	700854	Relocation	1495	1 LS	0.00	1,201	1,201	1,201	Relocations as needed through out PHA.
901	Haddington Homes	700854	Relocation	1495	1 LS	0.00	2,322	0	0	Relocations as needed through out PHA.
902	Mantua	700854	Relocation	1495	1 LS	0.00	6,760	6,760	5,434	Relocations as needed through out PHA.
904	Germantown/Hunting Park	700854	Relocation	1495	1 LS	0.00	3,124	3,124	3,124	Relocations as needed through out PHA.
905	Fairhill Square	700854	Relocation	1495	1 LS	0.00	1,270	1,270	1,270	Relocations as needed through out PHA.
907	Ludlow	700854	Relocation	1495	1 LS	0.00	7,054	7,054	7,054	Relocations as needed through out PHA.
908	Susquehanna	700854	Relocation	1495	1 LS	0.00	2,254	2,254	2,254	Relocations as needed through out PHA.
909	Strawberry Mansion	700854	Relocation	1495	1 LS	0.00	1,011	1,011	1,011	Relocations as needed through out PHA.
910	Oxford Jefferson	700854	Relocation	1495	1 LS	0.00	8,042	6,497	6,497	Relocations as needed through out PHA.
401401	Housing Operations	700854	Relocation	1495	1 LS	0.00	0			Relocations as needed through out PHA.
			Total Relocation	1495		0.00	210,183.00	148,766.00	129,106.00	
214	Roberto Clemente Homes	701490	New Development	1499	1 LS	0.00	1,200,000	1,200,000	640,801	Capital Funding for Roberto Clemente Homes
			Total Development	1499		0.00	1,200,000	1,200,000	640,801	
700700	Finance	701491	Bond Debt Service - Principle	1501	1 LS	5,070,000.00	5,070,000	5,070,000	5,070,000	bond debt principle payment for Tasker Bond
700700	Finance	701498	Bond Debt Service - Interest	1501	1 LS	2,358,212.00	2,358,212	2,228,625	2,228,625	bond debt interest payment for Tasker Bond
			Total Debt Service	1501		7,428,212.00	7,428,212	7,298,625	7,298,625	
			GRAND TOTAL			38,271,650	38,271,650	29,313,543	17,899,539	

PHILADELPHIA HOUSING AUTHORITY  
ANNUAL STATEMENT/PERFORMANCE AND EVALUATION  
REPORT  
FEDERAL FISCAL YEAR 2017

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires **06/30/2017**

<b>Part I: Summary</b>					
<b>PHA Name:</b> <b>PHILADELPHIA</b> <b>HOUSING AUTHORITY</b>	<b>Grant Type and Number</b> Capital Fund Program Grant No: <b>PA01P0025117</b> Replacement Housing Factor Grant No: Date of CFFP: <b>2017</b>	<b>FFY of Grant: 2017</b> <b>FFY of Grant Approval:</b>			
<b>Type of Grant</b>					
Original Annual Statement		Reserve for Disasters/Emergencies		Revised Annual Statement (revision no:   )	
Performance and Evaluation Report for Period Ending:			Final Performance and Evaluation Report		
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires **06/30/2017**

<b>Part I: Summary</b>					
<b>PHA Name:</b> <b>PHILADELPHIA</b> <b>HOUSING AUTHORITY</b>	<b>Grant Type and Number</b> Capital Fund Program Grant No: <b>PA01P0025117</b> Replacement Housing Factor Grant No: Date of CFFP: <b>2017</b>	<b>FFY of Grant: 2017</b> <b>FFY of Grant Approval:</b>			
<b>Type of Grant</b>					
Original Annual Statement		Reserve for Disasters/Emergencies		Revised Annual Statement (revision no:   )	
Performance and Evaluation Report for Period Ending:			Final Performance and Evaluation Report		
<b>Line</b>	<b>Summary by Development Account</b>	<b>Total Estimated Cost</b>		<b>Total Actual Cost <sup>1</sup></b>	
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	32,704,437.75			
16	1495.1 Relocation Costs				
17	1499 Development Activities <sup>4</sup>				
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	7,296,756.25			
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2 - 19)	\$40,001,194.00	\$0.00	\$0.00	\$0.00
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
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U.S. Department of Housing and Urban Development  
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<b>Part I: Summary</b>					
<b>PHA Name:</b> <b>PHILADELPHIA</b> <b>HOUSING AUTHORITY</b>	<b>Grant Type and Number</b>  Capital Fund Program Grant No: <b>PA01P0025117</b>  Replacement Housing Factor Grant No:  Date of CFFP: <b>2017</b>			<b>FFY of Grant: 2017</b>  <b>FFY of Grant Approval:</b>	
<b>Type of Grant</b>					
Original Annual Statement		Reserve for Disasters/Emergencies		Revised Annual Statement (revision no:   )	
Performance and Evaluation Report for Period Ending:			Final Performance and Evaluation Report		
<b>Line</b>	<b>Summary by Development Account</b>	<b>Total Estimated Cost</b>		<b>Total Actual Cost <sup>1</sup></b>	
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
<b>Signature of Executive Director</b>		<b>Date</b>		<b>Signature of Public Housing Director</b>	
				<b>Date</b>	

<sup>1</sup> To be completed for the Performance and Evaluation Report.

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

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHF funds shall be included here.

PHA Name: <b>PHILADELPHIA HOUSING AUTHORITY</b>		<b>Grant Type and Number</b>					<b>Federal FFY of Grant: 2017</b>		
		Capital Fund Program Grant No: <b>PA01P00250117</b>							
		CFFP (Yes/ No):							
		Replacement Housing Factor Grant No:							
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	
				Original	Revised <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>		
030 – Abbotsford	Pipe Replacement/Repairs	1492	TBD	40,000.00					
050 – Blumberg Sr Towers	Substantial Rehabilitation	1492	94	7,089,433.00					
055 – Fairhill	Aerco Replacement	1492	TBD	320,000.00					
055 – Fairhill	Playground equipment Replacement	1492	TBD	60,000.00					
029 - Hillcreek	Electrical replacements (transformer and Pole)	1492	TBD	500,000.00					
029 - Hillcreek	Playground equipment Replacement	1492	TBD	60,000.00					
029 - Hillcreek	Roof Replacement	1492	TBD	454,289.00					
063 – Katie B. Jackson	Roof Replacement	1492	TBD	146,350.00					
049 – Morton Homes	Electrical and Pipe replacement	1492	TBD	2,350,000.00					
014 – Norris Phase III	New Development	1492	TBD	8,000,000.00					

Part II: Supporting Pages									
Development Number Name/PHA-Wide Activities		General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
PHA Name: <b>PHILADELPHIA HOUSING AUTHORITY</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No: <b>PA01P00250117</b> CFFP (Yes/ No): Replacement Housing Factor Grant No:					<b>Federal FFY of Grant: 2017</b>		
Adminstrative Bldg- Penrose	Electrical System Upgrades	1492	TBD	120,000.00					
707707 - Budget Office	Strategic Evaluations	1492	TBD	13,564,365.75					
Debt Service	Bond Debt Service Payment Series 2002 A & D	1501	TBD	7,296,756.25					
<b>Total</b>				<b>\$ 40,001,194.00</b>					

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

<sup>2</sup> To be completed for the Performance and Evaluation Report.

## **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 2017)

	Name, Number and Location	Number and Type of Units	Note for FY 2019 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, administrative facilities 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.

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
4.	Bentley Hall PA002077	100 Elderly Units		As part of Sharswood Blumberg revitalization, possible façade improvements.		99 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.	
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 to purchase, conventional sale and Housing Choice vouchers.
6.	Cambridge Plaza Phase I PA-002137	44 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
7.	Cambridge Plaza Phase II PA-002129	40 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
8.	Cambridge Plaza Phase III Phase I PA002147	40 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
9.	Cassie Holly (Point Breeze)	71 Elderly Units	Security Upgrades	Possible candidate for modernization, rehabilitation		71 Elderly Units	Possible conversion of units/parcels for	

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
	Court) PA002062		Planned	with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.			residential unit reconfiguration and commercial, economic development, management offices, community and 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	Possible demolition in connection with modernization and revitalization, and possible disposition in connection	May be requesting Elderly or Disabled Only Designation	Possible conversion of units/parcels for residential unit reconfiguration and commercial,	Possible homeownership component, subject to Section 32 of the USHA of 1937 will

	Name, Number and Location	Number and Type of Units	Note for FY 2019 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.	with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.	Plan	economic development, management offices, community and supportive services offices and/or open space.	include lease to purchase, conventional sale and Housing Choice vouchers.
14.	Eastern North Philadelphia	45		Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to 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 to purchase, conventional sale and Housing Choice vouchers.
15.	Eight Diamonds PA00126 PA00141 (Formerly known as Raymond Rosen Off-Site PA002126)	Phases A & B; 152 Family	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 to 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	

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
							offices and/or open space.	
17.	Fairhill Apartments PA002055	264 Family			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.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
18.	Falls Ridge PA002130	135 LIHTC Rental Units		Development partner for 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 to purchase conventional sale and Housing Choice vouchers.
20.	Germantown House PA002152	133 Units	Planned renovation and leasing of adult care space. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance			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.	

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
			period.					
21.	Gladys B. Jacobs PA002114	80 Elderly	Intent for RAD conversion	Possible renovation for delivery of enhanced senior support services.		80 Elderly Units		
22.	Greater Grays Ferry Estates (Formerly known as Tasker Homes) New AMP#s: PA002139 PA002143	429 LIHTC rental units; 125 replacement home ownership units.	Water penetration repairs planned.	Possible mixed-finance development and commercial development including community building on PHA vacant lots and public parcels. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.	Possible disposition in connection with non-dwelling commercial development including 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			Possible conversion of units/parcels for residential unit	Possible homeownership component in

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				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.	connection with potential modernization and revitalization.
26.	Herbert Arlene Homes PA002104	32 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 Elderly Designation	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
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,	



	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
							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 modernization.	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.		Possible Elderly Designation	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
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.	Lucien E. Blackwell Homes Phase I PA002145	80 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
33.	Lucien E. Blackwell Homes Phase II PA002150	80 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
34.	Lucien E. Blackwell Homes Phase III PA002153	50 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
35.	Lucien E. Blackwell Homes Phase IV (Marshall Shepard Village) PA002156	80 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
36.	Ludlow HOPE 6 Area Scattered Sites PA #s: PA002154	Phases I, II, III, IV & V; 75 LIHTC and 103 Homeownership units		Development completed. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
37.	Mantua Hall PA002045	152 Family High-Rise Units	Water penetration repairs and leasing of commercial spaces.					
38.	Martin Luther King Plaza PA002036 New PA#s: PA002128 PA002136 PA002149	Phases I, II, III, IV, V & VI; 136 LIHTC Rental Units and 109 Replacement Homeownership Units.	Intent for RAD Conversion	All Phases completed. New construction of 19 market rate homeownership units on a portion of the site. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.	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.
39.	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.	Possible demolition in connection with modernization and revitalization.			Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease to purchase, conventional sale and Housing Choice vouchers.

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				May use ACCs and/or Capital Funds to develop units.				
40.	Mill Creek Extension West	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.			Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease to purchase conventional sale and Housing Choice vouchers.
41.	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.
42.	Mt. Olivet PA002138	161 LIHTC Rental Units		Possible major exterior envelope and air conditioner heating system to be improved. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.		161 Elderly Units		
43.	Nellie Reynolds Garden PA002158	64 Elderly housing units.		Development completed. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.		64 Elderly housing designation.		
44.	Neumann North PA002148	67 LIHTC Rental				67 Elderly Units Designated		

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
		Units						
45.	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.
46.	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 to purchase conventional sale and Housing Choice vouchers.
47.	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.
48.	Parkview Apartments PA002054	20 Elderly Low Rises						
49.	Paschall Homes	223 Family		Potential for refinancing, re-		Possible Elderly		Possible

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
	PA002061			syndication, change of entity ownership related to end of initial LIHTC compliance period.		Designation		homeownership component
50.	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, community and supportive services offices and/or open space. Reduce unit count from 60 to 53 with new community space.	
51.	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 to purchase conventional sale and Housing Choice vouchers.
52.	Raymond Rosen On-Site PA002010	356 Family						
53.	Richard Allen Homes Phase III PA002133	178 LIHTC Rental Units		Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				Includes 15-year tax credit and lease to purchase homeownership components.
54.	Richard Allen	150 Units		Possible new development for	Possible disposition in			Possible

	Name, Number and Location	Number and Type of Units	Note for FY 2019 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.
55.	Scattered Site Disposition: City-Wide	To be determined		Disposition Plan to be developed and implemented. Disposition of properties at market rate, for affordable housing or transfer to Land Bank	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.
56.	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.
57.	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	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,	Section 32 of USH of 1937.

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				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.			management offices, community and supportive services offices and/or open space.	
58.	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.
59.	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	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	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 FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				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.			offices and/or open space.	
60.	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.
61.	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	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 FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				developments. PHA plan to apply for Choice/RAD, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.				
62.	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.
63.	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	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 FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				and any other state and city funding sources when available.				
64.	Scattered Sites PA002000909	604 Family Units	Intent for RAD Conversion - 173 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 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.

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
66.	Sharswood Area Condemnation	1300 parcels to acquired	Complete condemnation process and pay just compensation to owners.	Land assembly activities to support revitalization activities in the Blumberg area. Activities to include demolition, disposition and new construction activities by PHA and/or Development Partners. Complete URA relocation of owners and tenants of condemned property.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development or to private developers.		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.
67.	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 to purchase, conventional sale and Housing Choice vouchers.
68.	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 to purchase, conventional sale and Housing Choice vouchers.
69.	Spring Garden Apartments PA002020	203 Family		Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds,	Potential demolition and disposition applications may be submitted for a portion of site.		Possible conversion of units/parcels for residential unit reconfiguration and commercial,	Possible homeownership component in connection with potential

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				MTW, program incomes, private funds with Choice/RAD and/or LIHTC Application.			economic development, management offices, community and supportive services offices and/or open space.	modernization and revitalization.
70.	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 to purchase, conventional sale and Housing Choice vouchers.
71.	Spring Garden Revitalization: Phase 1 PA002127	84 LIHTC Rental Units	Intent for RAD Conversion					
72.	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.			
73.	St Anthony's Senior Residence: PA002131	38 Elderly LIHTC Units	Intent for RAD Conversion			38 Elderly Units		
74.	St Ignatius Phase I (Angela Court II) PA002146 PA002159	Phases I; 67 Elderly Units Phase II 64?				67 and 54 Elderly Units Designated		
75.	Suffolk Manor PA002132	137 LIHTC Rental Units		Possible major exterior envelope and air conditioner heating system to be improved.		77 Elderly Units		
76.	Transitional Housing	500 Rental Units		New construction of transitional housing units for	Possible demolition in connection with		Possible conversion of units/parcels for	

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				homeless families and individuals and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	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.		residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
77.	Warnock PA002160	Phase I 50; TBD		Development completed. Potential for refinancing, re-syndication, change of entity ownership related to end of initial LIHTC compliance period.				
78.	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.		
79.	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.	
80.	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	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease to

	Name, Number and Location	Number and Type of Units	Note for FY 2019 Plan	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
				by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private entities.		development, management offices, community and supportive services offices and/or open space.	purchase, conventional sale and Housing Choice vouchers.
81.	Westpark Apartments PA002039	325 Family High-Rise 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 or to private developers.		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.
82.	Whitehall Apartments I PA002034	188 Family		Modernization completed.				
83.	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.	
84.	Walton School		RAD transfer of assistance site	Redevelopment into Senior Housing.				
85.	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 2019 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	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
<b>RAD TRANSFER OF ASSISTANCE</b>					
041691	PA002000901	4920 PARRISH ST	19139		4
041870	PA002000901	5063 PARRISH ST	19139		3
125875	PA002000901	228 N CECIL ST	19139		3
589279	PA002000901	232 N 58TH STREET	19139		3
599300	PA002000901	207 N 54TH STREET	19139		3
609339	PA002000901	150 N 58TH STREET	19139		3
609345	PA002000901	220 N 56TH STREET	19139		3
609353	PA002000901	239 N RUBY ST	19139		3
609429	PA002000901	27 N PEACH ST	19139		3
609431	PA002000901	652 N SICKELS ST	19131		2
690532	PA002000901	4924 OLIVE ST	19139		3
690682	PA002000901	5104 FUNSTON ST	19139		3
690813	PA002000901	4825 PARRISH ST	19139		3
857537	PA002000901	331 N FELTON ST	19139		3
888795	PA002000901	5306 RACE ST	19139		4
888810	PA002000901	5149 WYALUSING AVE	19131		4
888816	PA002000901	149 N 54TH STREET	19139		4
888831	PA002000901	437 S 62ND STREET	19143		3
888871	PA002000901	44 N 58TH STREET	19139		3
888872	PA002000901	551 N CREIGHTON ST	19131		3
976196	PA002000901	1650 N 60TH STREET	19151		3
041698	PA002000902	3926 RENO ST	19104		3
041839	PA002000902	3606 MELON ST	19104		6
041960	PA002000902	3932 WALLACE ST	19104		3
041985	PA002000902	3818 HAVERFORD AVE	19104		3
042269	PA002000902	614 N 38TH STREET	19104		5
042312	PA002000902	4167 MANTUA AVE	19104		5
042394	PA002000902	619 N 39TH STREET	19104		5
042682	PA002000902	3821 BRANDYWINE ST	19104		3
042753	PA002000902	3841 BRANDYWINE ST	19104		3
042979	PA002000902	724 N DEKALB ST	19104		3

UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
043490	PA002000902	768 N 38TH STREET	19104		5
124861	PA002000902	3866 OLIVE ST	19104		3
124908	PA002000902	3843 HAVERFORD AVE	19104		6
125272	PA002000902	3850 BROWN ST	19104		5
125398	PA002000902	3853 ASPEN ST	19104		3
125469	PA002000902	4203 OGDEN ST	19104		3
125789	PA002000902	763 N 37TH STREET	19104		2
125795	PA002000902	3608 WALLACE ST	19104		5
125851	PA002000902	612 N 39TH STREET	19104		6
125889	PA002000902	853 N 45TH STREET	19104		3
125902	PA002000902	746 N 38TH STREET	19104		3
690542	PA002000902	3921 FOLSOM ST	19104		3
690549	PA002000902	732 N 37TH STREET	19104		3
690720	PA002000902	866 N 47TH STREET	19139		3
690878	PA002000902	959 N 45TH STREET	19104		3
691074	PA002000902	632 N LOWBER ST	19104		3
691106	PA002000902	3825 BROWN ST	19104		4
691255	PA002000902	3504 MT VERNON ST	19104		3
691378	PA002000902	744 N 38TH STREET	19104		3
804109	PA002000902	610 UNION ST	19104		5
818055	PA002000902	766 N DEKALB ST	19104		3
818124	PA002000902	926 N 43RD STREET	19104		3
818186	PA002000902	628 N 37TH STREET	19104		5
818302	PA002000902	4223 W STILES ST	19104		5
818391	PA002000902	3828 ASPEN ST	19104		3
857199	PA002000903	1432 S 56TH STREET	19143		3
857281	PA002000903	5706 SPRINGFIELD AVE	19143		4
857287	PA002000903	5417 BELMAR TERRACE	19143		3
857339	PA002000903	1925 S REDFIELD ST	19143		3
857370	PA002000903	1705 S CONESTOGA ST	19143		2
857436	PA002000903	2114 S FRAZIER ST	19143		4
857453	PA002000903	2026 S CECIL ST	19143		3
857469	PA002000903	1841 S 55TH STREET	19143		4
857530	PA002000903	5722 PENTRIDGE ST	19143		3
857532	PA002000903	2124 S SHIELDS ST	19142		3
857554	PA002000903	5722 WINDSOR AVE	19143		3
857561	PA002000903	5855 WARRINGTON AVE	19143		3



UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
888734	PA002000903	1521 S PATTON ST	19146		3
888815	PA002000903	5427 BEAUMONT ST	19143		3
888855	PA002000903	5419 BELMAR TERRACE	19143		3
888897	PA002000903	5733 BEAUMONT ST	19143		3
916089	PA002000903	1434 S VODGES ST	19143		3
926719	PA002000903	1522 S LINDENWOOD ST	19143		3
976173	PA002000903	5508 WINDSOR ST	19143		3
976219	PA002000903	1754 S 60TH STREET	19142		4
124799	PA002000904	5811 CRITTENDON ST	19138		5
125570	PA002000904	3024 N 05TH STREET	19133		3
125892	PA002000904	3047 N CARLISLE ST	19132		3
818168	PA002000904	4509 N BOUVIER ST	19140		3
818174	PA002000904	4512 N BOUVIER ST	19140		3
818259	PA002000904	636 W CLEARFIELD ST	19133		3
818515	PA002000904	2823 N 12TH STREET	19133		5
857257	PA002000904	1516 ROWAN ST	19140		3
857327	PA002000904	67 E SEYMOUR ST	19144		3
857391	PA002000904	5329 N 12TH STREET	19141		4
857525	PA002000904	5215 N 10TH STREET	19141		3
888659	PA002000904	1221 W BUTLER ST	19140		4
888879	PA002000904	4210 N HICKS ST	19140		3
888920	PA002000904	500 E PENN ST	19144		3
916031	PA002000904	3646 N MARVINE ST	19140		4
916034	PA002000904	1116 W TIOGA ST	19140		4
916087	PA002000904	3109 N TAYLOR ST	19132		3
041526	PA002000905	1929 N 05TH STREET	19122		6
041661	PA002000905	2535 N 07TH STREET	19133		4
041936	PA002000905	2415 N LAWRENCE ST	19133		4
042452	PA002000905	2208 N 05TH STREET	19133		6
042697	PA002000905	2040 N 05TH STREET	19122		4
042895	PA002000905	2416 N LEITHGOW ST	19133		2
043064	PA002000905	2119 N 05TH STREET	19122		4
043134	PA002000905	2332 N 05TH STREET	19133		4
043135	PA002000905	2339 N 05TH STREET	19133		4
043635	PA002000905	1929 N 04TH STREET	19122		5
043939	PA002000905	2123 N 04TH STREET	19122		4
124819	PA002000905	1550 N LAWRENCE ST	19122		4

UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
124825	PA002000905	409 W SUSQUEHANNA AVE	19122		4
124876	PA002000905	2143 N 05TH STREET	19122		3
125044	PA002000905	2226 N ORKNEY ST	19133		4
125123	PA002000905	319 W NORRIS ST	19122		4
125139	PA002000905	2425 N MARSHALL ST	19133		5
125264	PA002000905	2138 N ORKNEY ST	19122		2
125275	PA002000905	2544 N 09TH STREET	19133		3
125290	PA002000905	1754 N 03RD STREET	19122		4
125317	PA002000905	2150 N 05TH STREET	19122		5
125342	PA002000905	2145 N 05TH STREET	19122		3
125470	PA002000905	626 W HUNTINGDON ST	19133		5
125489	PA002000905	1914 MUTTER ST	19122		2
125527	PA002000905	1933 N 04TH STREET	19122		5
125705	PA002000905	921 W HUNTINGDON ST	19133		5
125726	PA002000905	629 W CUMBERLAND ST	19133		5
125747	PA002000905	2514 N FRANKLIN ST	19133		3
125752	PA002000905	645 W CUMBERLAND ST	19133		5
125857	PA002000905	639 W CUMBERLAND ST	19133		5
125872	PA002000905	2427 N LAWRENCE ST	19133		4
255963	PA002000905	2237 N 04TH STREET	19133		5
690159	PA002000905	2451 N 05TH STREET	19133		5
690208	PA002000905	2631 N FRANKLIN ST	19133		3
690211	PA002000905	1921 N 05TH STREET	19122		4
690419	PA002000905	2250 N 02ND STREET	19133		6
690927	PA002000905	2509 N MARSHALL ST	19133		3
691054	PA002000905	2527 N FRANKLIN ST	19133		3
691107	PA002000905	2537 N 07TH STREET	19133		5
691119	PA002000905	2437 N MARSHALL ST	19133		5
691246	PA002000905	416 W NORRIS ST	19122		6
691384	PA002000905	2155 N 05TH STREET	19122		5
691454	PA002000905	2016 N LAWRENCE ST	19122		4
804307	PA002000905	548 W HUNTINGDON ST	19133		5
804359	PA002000905	616 W CUMBERLAND ST	19133		5
804492	PA002000905	2032 N 05TH STREET	19122		3
818224	PA002000905	1842 N 04TH STREET	19122		5
818434	PA002000905	955 N 06TH STREET	19123		6
818523	PA002000905	1931 N 04TH STREET	19122		5

UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
926754	PA002000905	2526 N LAWRENCE ST	19133		3
926791	PA002000905	2434 N 04TH STREET	19133		2
043079	PA002000906	1728 FOLSOM ST	19130		5
043496	PA002000906	1515 N BOUVIER ST	19121	A	2
043497	PA002000906	1515 N BOUVIER ST	19121	B	5
043557	PA002000906	1730 W MASTER ST	19121	A	3
043558	PA002000906	1730 W MASTER ST	19121	B	3
043559	PA002000906	1730 W MASTER ST	19121	C	3
043595	PA002000906	1728 W MASTER ST	19121	A	3
043596	PA002000906	1728 W MASTER ST	19121	B	3
043597	PA002000906	1728 W MASTER ST	19121	C	3
043787	PA002000906	1004 GREEN ST	19123	A	1
043788	PA002000906	1004 GREEN ST	19123	B	4
043921	PA002000906	1010 GREEN ST	19123	A	2
043922	PA002000906	1010 GREEN ST	19123	B	5
690317	PA002000906	1505 N 17TH STREET	19121	A	3
690318	PA002000906	1505 N 17TH STREET	19121	B	4
690319	PA002000906	1505 N 17TH STREET	19121	C	2
804644	PA002000906	1438 N 17TH STREET	19121	A	4
804645	PA002000906	1438 N 17TH STREET	19121	B	4
041519	PA002000907	1717 N Marshall St	19122		4
041860	PA002000907	933 W York St	19133		5
042242	PA002000907	1218 W SERGEANT ST	19133		3
042431	PA002000907	2006 N 08TH STREET	19122		6
043963	PA002000907	2642 N SARTAIN ST	19133		2
124862	PA002000907	809 DIAMOND ST	19122		6
124984	PA002000907	2535 N 11TH STREET	19133		5
125095	PA002000907	619 WESTMONT ST	19122		2
125174	PA002000907	2234 N CAMAC ST	19133		6
125334	PA002000907	2436 N DELHI ST	19133		2
125741	PA002000907	1222 W HAZZARD ST	19133		3
818047	PA002000907	2163 N FRANKLIN ST	19122		5
041565	PA002000908	2070 W GLENWOOD AVE	19132		4
041637	PA002000908	3023 W SUSQUEHANNA AVE	19121		5
041706	PA002000908	2344 N OPAL ST	19132		3
041831	PA002000908	2201 W SERGEANT ST	19132		2
041833	PA002000908	2205 W SERGEANT ST	19132		2

UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
041920	PA002000908	1426 W YORK ST	19132		6
041977	PA002000908	1921 W DAUPHIN ST	19132		5
042013	PA002000908	3311 W HUNTINGDON ST	19132		4
042033	PA002000908	3143 W ARIZONA ST	19132		2
042122	PA002000908	2248 N 17TH STREET	19132	A	2
042123	PA002000908	2248 N 17TH STREET	19132	B	4
042305	PA002000908	2543 N COLORADO ST	19132		2
042363	PA002000908	2129 W DAUPHIN ST	19132		5
042444	PA002000908	2644 N 29TH STREET	19132		6
042825	PA002000908	2230 N 17TH STREET	19132	A	2
042826	PA002000908	2230 N 17TH STREET	19132	B	5
042956	PA002000908	2220 N 17TH STREET	19132	A	2
042957	PA002000908	2220 N 17TH STREET	19132	B	5
124982	PA002000908	2317 W SERGEANT ST	19132		3
125056	PA002000908	2343 N 20TH STREET	19132		6
125151	PA002000908	2345 N VAN PELT ST	19132		3
125178	PA002000908	2415 W HAROLD ST	19132		3
125263	PA002000908	2528 N BANCROFT ST	19132		3
125416	PA002000908	2539 N NATRONA ST	19132		3
125429	PA002000908	2460 N DOVER ST	19132		2
125592	PA002000908	2247 N 17TH STREET	19132		6
125654	PA002000908	2539 W HAROLD ST	19132		3
125698	PA002000908	1625 W HUNTINGDON ST	19132		5
125873	PA002000908	2315 N VAN PELT ST	19132		3
255945	PA002000908	2406 N 15TH STREET	19132		5
255971	PA002000908	2258 N 17TH STREET	19132		6
690007	PA002000908	2524 N 16TH STREET	19132		4
690096	PA002000908	2211 N BOUVIER ST	19132		3
690106	PA002000908	2334 N OPAL ST	19132		3
690109	PA002000908	2246 N BANCROFT ST	19132		3
690110	PA002000908	2356 N VAN PELT ST	19132		3
690118	PA002000908	2319 N CLEVELAND ST	19132		3
690135	PA002000908	2444 N GARNET ST	19132		3
690412	PA002000908	2269 N COLORADO ST	19132		3
690558	PA002000908	2342 N 18TH STREET	19132		4
690565	PA002000908	2209 N COLORADO ST	19132		3
690573	PA002000908	2531 N BOUVIER ST	19132		3

UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
690578	PA002000908	2506 N CHADWICK ST	19132		3
690593	PA002000908	2645 N COLORADO ST	19132		3
690691	PA002000908	3113 W DAUPHIN ST	19132		3
690722	PA002000908	2452 N NATRONA ST	19132		3
690745	PA002000908	2515 N COLORADO ST	19132		3
690777	PA002000908	2525 N COLORADO ST	19132		3
690899	PA002000908	2355 N VAN PELT ST	19132		3
690904	PA002000908	2513 N COLORADO ST	19132		3
690957	PA002000908	2046 W GLENWOOD AVE	19132		4
690986	PA002000908	2444 N COLORADO ST	19132		3
691027	PA002000908	2327 N COLORADO ST	19132		3
691040	PA002000908	2560 N SYDENHAM ST	19132		3
691135	PA002000908	2619 N CORLIES ST	19132		3
691163	PA002000908	2469 N COLORADO ST	19132		3
691296	PA002000908	2511 N NAPA ST	19132		3
691370	PA002000908	2402 W OAKDALE ST	19132		3
804769	PA002000908	2260 N 17TH STREET	19132		6
818004	PA002000908	2323 N COLORADO ST	19132		3
818111	PA002000908	2357 N COLORADO ST	19132		3
818126	PA002000908	2614 N 16TH STREET	19132		5
818151	PA002000908	2528 N NATRONA ST	19132		3
818230	PA002000908	2455 N BOUVIER ST	19132		3
818314	PA002000908	2605 N STANLEY ST	19132		3
818342	PA002000908	2232 N 17TH STREET	19132		6
818411	PA002000908	2513 N MARSTON ST	19132		3
818496	PA002000908	2229 W DAUPHIN ST	19132		3
818526	PA002000908	2225 N BANCROFT ST	19132		3
857219	PA002000908	2233 N CHADWICK ST	19132		3
857240	PA002000908	2324 N COLORADO ST	19132		3
888572	PA002000908	2627 N 18TH STREET	19132		3
926743	PA002000908	2347 N CLEVELAND ST	19132		3
926767	PA002000908	2403 W OAKDALE ST	19132		4
041607	PA002000909	2120 N 20TH STREET	19121		6
041802	PA002000909	2115 N NEWKIRK ST	19121		2
041816	PA002000909	2933 WESTMONT ST	19121		2
041907	PA002000909	2841 DIAMOND ST	19121	A	2
041908	PA002000909	2841 DIAMOND ST	19121	B	6

UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
041998	PA002000909	2956 WESTMONT ST	19121		3
042030	PA002000909	2104 N 16TH STREET	19121	A	3
042031	PA002000909	2104 N 16TH STREET	19121	B	3
042032	PA002000909	2104 N 16TH STREET	19121	C	1
042062	PA002000909	2936 WESTMONT ST	19121		2
042810	PA002000909	2117 N 15TH STREET	19121	A	3
042811	PA002000909	2117 N 15TH STREET	19121	B	3
042812	PA002000909	2117 N 15TH STREET	19121	C	3
042882	PA002000909	2124 N 21ST STREET	19121	A	2
042883	PA002000909	2124 N 21ST STREET	19121	C	4
043472	PA002000909	2020 N BAMBREY ST	19121	A	3
043473	PA002000909	2020 N BAMBREY ST	19121	B	3
043511	PA002000909	1803 N 18TH STREET	19121	A	3
043512	PA002000909	1803 N 18TH STREET	19121	B	3
043513	PA002000909	1803 N 18TH STREET	19121	C	3
043626	PA002000909	2018 N 32ND STREET	19121	A	2
043627	PA002000909	2018 N 32ND STREET	19121	B	6
125359	PA002000909	2942 W SUSQUEHANNA AVE	19121		3
125798	PA002000909	3114 WESTMONT ST	19121		3
690070	PA002000909	1816 N NEWKIRK ST	19121		3
690515	PA002000909	1824 N BUCKNELL ST	19121		3
690516	PA002000909	1802 N BUCKNELL ST	19121		3
690517	PA002000909	1804 N BUCKNELL ST	19121		3
690524	PA002000909	1825 N BUCKNELL ST	19121		3
690525	PA002000909	1847 N BUCKNELL ST	19121		3
690526	PA002000909	1821 N BUCKNELL ST	19121		3
690541	PA002000909	1843 N BUCKNELL ST	19121		3
690557	PA002000909	1825 N 26TH STREET	19121		3
690804	PA002000909	2153 N 21ST STREET	19121	A	4
690805	PA002000909	2153 N 21ST STREET	19121	B	2
690815	PA002000909	1923 N RINGGOLD ST	19121		3
690851	PA002000909	2151 N NATRONA ST	19121		3
690936	PA002000909	2022 N 20TH STREET	19121		5
691021	PA002000909	1838 N BUCKNELL ST	19121		3
803989	PA002000909	2028 N 31ST STREET	19121		3
804208	PA002000909	1843 N 17TH STREET	19121	A	3
804209	PA002000909	1843 N 17TH STREET	19121	B	3

UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
804210	PA002000909	1843 N 17TH STREET	19121	C	3
804328	PA002000909	2009 N 17TH STREET	19121	A	4
804329	PA002000909	2009 N 17TH STREET	19121	B	4
804660	PA002000909	1512 DIAMOND ST	19121	A	4
804661	PA002000909	1512 DIAMOND ST	19121	B	4
818011	PA002000909	2135 N NATRONA ST	19121		3
818033	PA002000909	1844 N JUDSON ST	19121		3
818279	PA002000909	1860 N TANEY ST	19121		3
818338	PA002000909	1820 N 22ND STREET	19121		6
818362	PA002000909	1816 N RINGGOLD ST	19121		5
818416	PA002000909	3110 EUCLID ST	19121		6
818418	PA002000909	1806 N TANEY ST	19121		3
818463	PA002000909	3113 W NORRIS ST	19121		3
818471	PA002000909	3106 W BERKS ST	19121		3
041682	PA002000910	2435 CLIFFORD ST	19121		6
041838	PA002000910	2320 SHARSWOOD ST	19121		4
043073	PA002000910	2403 W OXFORD ST	19121		6
043252	PA002000910	1521 N 25TH STREET	19121		6
124843	PA002000910	2408 REDNER ST	19121		4
124892	PA002000910	2319 SHARSWOOD ST	19121		4
124949	PA002000910	1730 N MARSTON ST	19121		3
124963	PA002000910	1744 N 27TH STREET	19121		4
125110	PA002000910	1731 N TANEY ST	19121		3
125700	PA002000910	2403 INGERSOLL ST	19121		2
125867	PA002000910	1230 N DOVER ST	19121		3
125934	PA002000910	2238 INGERSOLL ST	19121		4
690016	PA002000910	1455 N HOLLYWOOD ST	19121		3
690022	PA002000910	1740 N 28TH STREET	19121		4
690029	PA002000910	1645 N NEWKIRK ST	19121		3
690114	PA002000910	1521 N NEWKIRK ST	19121		3
690551	PA002000910	1454 N HOLLYWOOD ST	19121		3
690633	PA002000910	2931 CECIL B MOORE AVE	19121		6
690737	PA002000910	2402 W THOMPSON ST	19121		5
691090	PA002000910	1738 N NEWKIRK ST	19121		3
691436	PA002000910	1430 N CORLIES ST	19121		3
804684	PA002000910	2828 W MASTER ST	19121	A	4
804685	PA002000910	2828 W MASTER ST	19121	B	4

UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
818137	PA002000910	1525 N 25TH STREET	19121		6
818204	PA002000910	1325 N 23RD STREET	19121		5
818255	PA002000910	2403 REDNER ST	19121		4
888580	PA002000910	1402 N 27TH STREET	19121		4
888633	PA002000910	2040 W MASTER ST	19121		6
888636	PA002000910	2927 W MASTER ST	19121		4
<b>DEMO/DISPO OF NON-VIABLE UNITS</b>					
804142	PA002000906	624 N 12TH STREET	19123	A	3
804143	PA002000906	624 N 12TH STREET	19123	B	3
804144	PA002000906	624 N 12TH STREET	19123	C	3
804114	PA002000907	1908 N 08TH STREET	19122		5
804352	PA002000907	1931 N 09TH STREET	19122		4
043159	PA002000909	2122 N 16TH STREET	19121	A	3
043160	PA002000909	2122 N 16TH STREET	19121	B	3
043161	PA002000909	2122 N 16TH STREET	19121	C	3
043244	PA002000909	2153 N 15TH STREET	19121	A	3
043245	PA002000909	2153 N 15TH STREET	19121	B	3
043246	PA002000909	2153 N 15TH STREET	19121	C	3
041531	PA002000910	2126 W MASTER ST	19121		5
042995	PA002000910	2324 SHARSWOOD ST	19121		5
043827	PA002000910	2440 NICHOLAS ST	19121		5
043913	PA002000910	1535 N 22ND STREET	19121		5
690619	PA002000910	2313 W THOMPSON ST	19121		4
690808	PA002000910	2441 W OXFORD ST	19121	A	2
690809	PA002000910	2441 W OXFORD ST	19121	B	4
818226	PA002000910	2042 W MASTER ST	19121		5
818368	PA002000910	2415 TURNER ST	19121		5
<b>VACANT LOTS</b>					
125506	PA002000901	648 N YEWDALL ST	19131		2
691373	PA002000901	645 N CREIGHTON ST	19131		3
041580	PA002000902	3929 FOLSOM ST	19104		3
042445	PA002000902	3944 FOLSOM ST	19104		5
043116	PA002000902	823 N 40TH STREET	19104	A	2
043117	PA002000902	823 N 40TH STREET	19104	B	4
125572	PA002000902	3913 FOLSOM ST	19104		3
125599	PA002000902	3935 FAIRMOUNT AVE	19104		5
125780	PA002000902	644 N 38TH STREET	19104		



UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
125871	PA002000902	3932 BROWN ST	19104		6
690276	PA002000902	3849 FAIRMOUNT AVE	19104	A	3
690277	PA002000902	3849 FAIRMOUNT AVE	19104	B	2
691067	PA002000902	3711 MT VERNON ST	19104		3
691186	PA002000902	806 N 38TH STREET	19104		5
691187	PA002000902	3822 MT VERNON ST	19104		3
691218	PA002000902	3527 MT VERNON ST	19104		3
691383	PA002000902	741 N DEKALB ST	19104		3
818438	PA002000902	656 N 36TH STREET	19104		6
888670	PA002000902	729 N 39TH STREET	19104		4
125493	PA002000903	1247 S HANSON ST	19143		2
125637	PA002000903	1243 S HANSON ST	19143		2
926716	PA002000903	6015 ALLMAN ST	19142		3
125664	PA002000904	2712 W STERNER ST	19132		2
818098	PA002000904	3154 N CARLISLE ST	19132		2
916024	PA002000904	1211 WINGOHOCKING ST	19140		4
926746	PA002000904	4815 GREENE ST	19144		6
041570	PA002000905	1933 N 05TH STREET	19122		4
041572	PA002000905	1937 N 05TH STREET	19122		4
041772	PA002000905	2532 N HOWARD ST	19133		5
041932	PA002000905	2108 N 05TH STREET	19122		5
041957	PA002000905	421 W DAUPHIN ST	19133		5
042356	PA002000905	2242 N 04TH STREET	19133		5
042835	PA002000905	2024 N BODINE ST	19122		2
043940	PA002000905	2148 N ORKNEY ST	19122		3
125007	PA002000905	2552 N HOWARD ST	19133		5
125018	PA002000905	2134 N ORKNEY ST	19122		4
125152	PA002000905	2542 N HOWARD ST	19133		5
125279	PA002000905	2128 N 05TH STREET	19122		4
125513	PA002000905	2021 N 05TH STREET	19122		5
690200	PA002000905	532 W BERKS ST	19122		4
690728	PA002000905	2642 N 03RD STREET	19133		3
691192	PA002000905	2522 N 09TH STREET	19133		4
041916	PA002000906	1432 N 17TH STREET	19121	A	2
041917	PA002000906	1432 N 17TH STREET	19121	B	6
041918	PA002000906	1616 W FLORA ST	19121		4
041959	PA002000906	1913 PARRISH ST	19130		5

UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
043773	PA002000906	632 N 12TH STREET	19123	A	3
043774	PA002000906	632 N 12TH STREET	19123	B	3
043775	PA002000906	632 N 12TH STREET	19123	C	3
043980	PA002000906	1423 N 17TH STREET	19121	A	3
043981	PA002000906	1423 N 17TH STREET	19121	B	3
043982	PA002000906	1423 N 17TH STREET	19121	C	3
043983	PA002000906	1425 N 17TH STREET	19121	A	3
043984	PA002000906	1425 N 17TH STREET	19121	B	3
043985	PA002000906	1425 N 17TH STREET	19121	C	3
125328	PA002000906	1609 OGDEN ST	19130		4
690294	PA002000906	1427 N 17TH STREET	19121	A	3
690295	PA002000906	1427 N 17TH STREET	19121	B	3
690296	PA002000906	1427 N 17TH STREET	19121	C	3
690306	PA002000906	1443 N 17TH STREET	19121	A	3
690307	PA002000906	1443 N 17TH STREET	19121	B	3
690308	PA002000906	1443 N 17TH STREET	19121	C	3
690446	PA002000906	1726 W MASTER ST	19121	A	3
690447	PA002000906	1726 W MASTER ST	19121	B	3
690448	PA002000906	1726 W MASTER ST	19121	C	3
042235	PA002000907	2311 N 10TH STREET	19133	A	1
042236	PA002000907	2311 N 10TH STREET	19133	B	4
125828	PA002000907	2512 N 10TH STREET	19133		5
691422	PA002000907	2138 N FRANKLIN ST	19122		5
042578	PA002000908	2309 N CROSKEY ST	19132		3
042994	PA002000908	2266 N VAN PELT ST	19132		3
125002	PA002000908	2230 N 19TH STREET	19132		6
125531	PA002000908	2224 N 19TH STREET	19132		6
125836	PA002000908	2216 N 19TH STREET	19132		6
691072	PA002000908	2425 N MARSTON ST	19132		2
818482	PA002000908	2218 N 19TH STREET	19132		6
926742	PA002000908	2320 N CLEVELAND ST	19132		3
041557	PA002000909	2940 PAGE ST	19121		3
041715	PA002000909	2017 N BAMBREY ST	19121		3
041721	PA002000909	1835 N VAN PELT ST	19121		6
042275	PA002000909	1731 W MONTGOMERY AVE	19121	A	3
042276	PA002000909	1731 W MONTGOMERY AVE	19121	B	4
042277	PA002000909	1731 W MONTGOMERY AVE	19121	C	1

UNIT ID	AMP NO.	UNIT ADDRESS	ZIP CODE	APT #	BR SIZE
042795	PA002000909	1917 N 24TH STREET	19121		5
125138	PA002000909	1847 N JUDSON ST	19121		3
125339	PA002000909	1914 N 24TH STREET	19121		6
690009	PA002000909	2228 PAGE ST	19121		3
690013	PA002000909	1812 N 27TH STREET	19121		5
690595	PA002000909	1833 N TANEY ST	19121		3
691281	PA002000909	2121 N 19TH STREET	19121	A	2
691282	PA002000909	2121 N 19TH STREET	19121	B	6
804404	PA002000909	1908 N 24TH STREET	19121	A	3
804405	PA002000909	1908 N 24TH STREET	19121	B	2
818129	PA002000909	1921 N 24TH STREET	19121		5
818152	PA002000909	2139 N 19TH STREET	19121		6
818386	PA002000909	2114 N 19TH STREET	19121		6
818472	PA002000909	1826 N BUCKNELL ST	19121		3
818530	PA002000909	1923 N 24TH STREET	19121		5
041744	PA002000910	2703 W JEFFERSON ST	19121		5
043251	PA002000910	2437 REDNER ST	19121		4
125113	PA002000910	2403 CECIL B MOORE AVE	19121	A	3
125114	PA002000910	2403 CECIL B MOORE AVE	19121	B	4
125482	PA002000910	2425 NASSAU ST	19121		2
125868	PA002000910	2412 NASSAU ST	19121		2
690052	PA002000910	1427 N HOLLYWOOD ST	19121		3
804571	PA002000910	2410 CECIL B MOORE AVE	19121		5
818369	PA002000910	2707 W JEFFERSON ST	19121		3

## 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 cost limits in 2009. Subject to HUD approval, PHA will periodically review and update the MTW TDC/HCC cost limits.

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

## Appendix 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. Low Income Housing Tax Credit sites managed by PAPMC, Moderate Rehab units and non-MTW vouchers are not subject to rent simplification and are not included in this analysis.

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

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

The following is a summary of the results of the 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**

	<b>Housing Choice Voucher Households</b>	<b>Public Housing Households</b>
Average	28%	28%
25 <sup>th</sup> Percentile	27%	27%
Median	28%	28%
75 <sup>th</sup> Percentile	28%	28%
Max	28%	28%
Households reporting income of	922 (6%)	667 (7%)

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

## 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 current annual savings resulting from PHA's adoption of this policy.

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

	Households on CRP
# of HCV participants who are eligible for a gas utility allowance	11,798
# of HCV participants who pay gas heat and are eligible for CRP	5,765
Total gas portion without application of CRP	\$1,347,255
Total gas portion with application of CRP	\$1,006,775
Monthly Savings	\$340,480
<b>Annual Savings to PHA</b>	<b>\$4,085,760</b>

## **Appendix I: Board Resolution & MTW Certification**

**RESOLUTION NO. 11974**

**RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY TO SUBMIT ITS MOVING TO WORK ANNUAL PLAN ("PLAN") FOR FISCAL YEAR 2019, 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**, 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"), pursuant to the Philadelphia Housing Authority ("PHA") Board of Commissioners Resolution No. 10618, dated December 21, 2000, PHA has continuously participated in the MTW Demonstration Program, as detailed in Resolution 11577, adopted by the Board on January 11, 2013; Resolution 11669, approved on January 16, 2014; Resolution 11752, approved on December 18, 2014; Resolution 11825, approved on December 17, 2015; and Resolution 11904, approved on December 15, 2016; 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 2019 ("Plan"), beginning on April 1, 2018, a summary of which is attached hereto as Attachment "A," which includes the Rental Assistance Demonstration Program Significant Amendments for Four (4) transfer of assistance developments, 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 13, 2017; 2) holding a Public Hearing on November 29, 2017; 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 10, 2017 to December 11, 2017;

**BE IT RESOLVED** that the Board of Commissioners hereby approves the MTW Annual Plan for Fiscal Year 2019, 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 2019; 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, 2018, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

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

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

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

12/21/17  
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.

**ADDENDA  
TO  
CERTIFICATION OF PAYMENTS TO INFLUENCE FEDERAL TRANSACTIONS**

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

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

**Signature:** 

**Date:** 1/12/18

# 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 2019

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 Federal agency 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

Kelvin A. Jeremiah

Title

President & CEO

Signature

Date

X

# Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Applicant Name

Philadelphia Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Annual Plan FY 2019

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

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

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

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

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

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

Name of Authorized Official

Title

Kelvin A. Jeremiah

President & CEO

Signature

Date (mm/dd/yyyy)

1/12/18

# 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.)

<b>1. Type of Federal Action:</b> a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	<b>2. Status of Federal Action.</b> a. bid/offer/application b. initial award c. post-award	<b>3. Report Type:</b> a. initial filing b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____
<b>4. Name and Address of Reporting Entity:</b> <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Congressional District, if known 4c 2nd		<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  Congressional District, if known:
<b>6. Federal Department/Agency.</b> U.S. Department of Housing and Urban Development	<b>7. Federal Program Name/Description:</b> Moving to Work Annual Plan FY 2019 CFDA Number, if applicable: 14.870	
<b>8. Federal Action Number, if known:</b>	<b>9. Award Amount, if known:</b> \$	
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI):  Not applicable	<b>b. Individuals Performing Services (including address if different from No. 10a)</b> (last name, first name, MI)	
<b>11.</b> 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 where 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: 1/2/18	
<b>Federal Use Only:</b>		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 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 2019Location of the Project: The development and implementation of affordable housing and  
economic development initiatives in Philadelphia in accordance with the  
City's Consolidated Plan and Assessment of Fair HousingName of the Federal  
Program to which the  
applicant is applying: HUD - Moving to Work DemonstrationName of  
Certifying Jurisdiction: City of Philadelphia, Division of Housing and Community DevelopmentCertifying Official  
of the Jurisdiction  
Name: ANNE TADULLONTitle: DIRECTOR OF PLANNING + DEVELOPMENTSignature: Date: 1.12.18