



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

SPECIAL ATTENTION OF:

Regional Managers; Office of Public Housing
Directors; Program Center Coordinators;
Public Housing Agencies; Resident
Management Corporations

NOTICE PIH 2014-14 (HA)

Issued: June 18, 2014

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superseded, or rescinded

Cross-references: 24 CFR Part 972, subpart B,
Notice PIH 2014-5

Subject: Voluntary conversion assessment for public housing agencies (PHAs) with fewer than 250 public housing units

- 1) **Purpose.** To offer small PHAs a streamlined cost analysis and process for the voluntary conversion of public housing to Housing Choice Vouchers (HCVs) under the authority provided at section 22(b)(3) of the United States Housing Act of 1937 (42 U.S.C. 1437t(b)(3)) (1937 Act), and to clarify the applicable conversion implementation requirements of 24 CFR part 972.
- 2) **Background.** Under section 22(b)(3) of the 1937 Act (voluntary conversion of public housing), a PHA may convert any public housing project (or portion thereof) to HCVs if the cost of conversion will be no greater than the cost of continuing to operate the units as public housing. The PHA must conduct a “conversion assessment” that includes a cost analysis, an analysis of the market value of the public housing project, an analysis of rental market conditions, and an impact analysis. The statute allows HUD to waive the conversion assessment, however, or to require a streamlined conversion assessment for “any public housing project or class of public housing projects.” Out of a recognition that the regulatory burden on small PHAs is out of proportion to the federal resources available to them, the Department is making available via this Notice a conversion assessment that streamlines the cost analysis for small PHAs.
- 3) **Eligibility Criteria.** A public housing project is eligible for the conversion under this Notice if it meets the criteria listed below.
 - A) It is owned by a PHA that operates fewer than 250 public housing units; conversion of the project or projects will result in the conversion of all public housing units owned by the PHA; and the level of HCV housing assistance provided to the PHA that will administer such assistance will not exceed the level of public housing assistance provided to units in the project.

- i) HUD is exercising its statutory authority to waive the cost analysis described at 42 U.S.C. 1437t(b)(1)(A) and has adopted the methodology described in Appendix A to determine which projects are eligible for conversion under this Notice; Appendix A lists these eligible projects. A PHA that wishes to convert an eligible project listed in Appendix A will not be required to prepare the cost analysis described at 24 CFR 972.218(a).
 - ii) HUD will consider a request for a reexamination of eligibility from a PHA that believes it was excluded from the list in Appendix A due to a technical error (i.e., number of units) in HUD's PIH Information Center (PIC). Contact SACTA@hud.gov to initiate such a request.
- B) In order for its application for conversion to be considered and reviewed, the applicant PHA and voucher PHA (if applicable — see paragraph (5) of this Notice) must be in compliance with all fair housing and civil rights requirements at 24 CFR 5.105(a) and may not have an outstanding charge, cause determination, lawsuit, or finding of noncompliance with such requirements that is not the subject of a voluntary compliance agreement, settlement agreement, consent order, or other remedial agreement to which the PHA is a party. Furthermore, neither the applicant PHA nor the voucher PHA (if applicable) may be in breach of any such agreement or order.
- C) A PHA that wishes to convert a project eligible under this Notice must provide evidence that conversion will principally benefit residents, the PHA, and the community. The PHA may demonstrate that conversion will meet this requirement by means of an analysis of rental market conditions, in accordance with 24 CFR 972.218(c).
- D) If a PHA that wishes to convert a project eligible under this Notice intends to dispose of the project to another entity via public bid at Fair Market Value (FMV) with no requirement that the project be maintained as rental housing for low-income families, then the PHA must provide evidence to demonstrate that conversion (and subsequent disposition as described) will not adversely affect the availability of affordable housing in the community, in accordance with 24 CFR 972.218(d).
- 4) **Availability of Tenant Protection Vouchers.** Pursuant to 24 CFR 972.212(a), PHAs applying for conversion may be given priority for receiving tenant-based assistance. PHAs should apply for tenant protection vouchers (TPVs) from their local HUD Field Office of Public Housing in accordance with the requirements of Notice PIH 2014–5 and Form HUD-52515. For FY14, the Department is making available up to 1,000 TPVs to fund conversions under this Notice, subject to the availability of appropriations.
- 5) **PHAs that Do Not Administer HCV Assistance.** An applicant PHA that does not administer HCV assistance is ineligible to convert a project under this Notice unless it obtains a written commitment from a voucher PHA to administer the HCV assistance (tenant protection vouchers), pursuant to HUD's approval of the conversion plan.
- 6) **Conversion Implementation Requirements.** Appendix B consists of a chart that identifies the requirements of 24 CFR Part 972, Subpart B, that apply under this Notice. Generally, PHAs must conduct a conversion assessment consistent with HUD's regulations at 24 CFR 972.218, except that they do not need to conduct a cost analysis (24 CFR 972.218(a)), because HUD has already performed such an analysis, nor do they need to conduct an

analysis of market value (24 CFR 972.218(b)). An applicant PHA shall submit to HUD a written summary based on its analysis of rental market conditions (24 CFR 972.218(c)) and an impact analysis (24 CFR 972.218(d)).¹

Applicant PHAs are reminded to review 24 CFR 972.224(a)(2) ("Benefit to residents, PHA, and the community") in the conduct of the impact analysis. In determining whether a conversion will principally benefit residents, the PHA, and the community, HUD will consider whether the conversion will conflict with any litigation settlement agreements, voluntary compliance agreements, or other remedial agreements signed by the PHA and HUD. The applicant PHA will therefore identify to HUD any agreement and indicate any conflicts. The applicant PHA may propose modifications to remedial agreements as a component of its conversion plan.

- 7) PHA Plan Requirements.** For PHAs required to prepare and submit an annual PHA plan to HUD, proposed conversion under this Notice must be identified in the PHA Annual Plan or in a significant amendment to the PHA plan. Pursuant to 24 CFR 972.209, the PHA must submit both the conversion assessment (as modified by the Notice) and conversion plan to HUD as part of its PHA Annual Plan (or significant amendment to that plan). PHAs are reminded that, in accordance with 24 CFR 903.15, a PHA plan or significant amendment to the PHA plan must contain a certification of consistency with the Consolidated Plan for the jurisdiction in which the PHA is located.

Qualified PHAs, as defined in the Housing and Economic Recovery Act, no longer submit PHA Annual Plans to HUD but are still required to hold an annual public hearing on their public housing activities (or a subsequent public hearing that would be similar to a significant amendment), including any and all planned conversions.

In addition, all PHAs, including Qualified PHAs, must continue annually to submit the HUD-50077-CR to HUD along with any other required civil rights compliance certifications required under applicable PHA plan requirements.

An applicant PHA must include the following information about the proposed conversion in its annual PHA plan/significant amendment submission or public hearing (in the case of a Qualified PHA):

- A)** A description of the building or buildings that the PHA plans to convert to tenant-based assistance.
- B)** A description of the intended plans for the converted public housing project(s), including any demolition or disposition, provision of financing, rehabilitation, or modernization of the property and the impact on affordable housing in the community. If tenants will be

¹ The impact analysis shall describe the conversion's likely impact on the availability of affordable housing in the neighborhood, the concentration of poverty in the neighborhood, and other substantial matters in the neighborhood, as described at 24 CFR 972.218(d). In particular, the impact analysis shall address how the proposed conversion will contribute (or not contribute) to the diversification of available housing opportunities (types; number of affordable and market-rate rental units, including accessible units; and prices) within the community; whether rents and housing prices will be affordable to the displaced families; whether the relocated residents will have easy access to public and private facilities and services, such as retail establishments, parks, public transportation, employment, and schools; whether the unique needs of special household groups will be considered and how; and whether there will be a concentration of poverty in the neighborhood(s) to which the residents will be relocating.

displaced as a result of these future activities, then the PHA's relocation plan must be included.

- C) The name of the PHA that will administer the HCVs, if different from the converting PHA.
- D) A description of the PHA's outreach to families on its public housing waiting list. Such outreach must notify families that they must apply to the HCV program of the PHA that will administer the HCV assistance following conversion, which may be different from the applicant PHA. Pursuant to Title VI, a PHA must, among other things, take reasonable steps that ensure meaningful access to programs and activities by persons who, as a result of national origin, have limited English proficiency (LEP).² The outreach materials must be made available in formats accessible to persons with disabilities and in languages spoken by limited English proficient persons on the waiting list. Information in languages other than English may be made available orally or in writing, depending on whether each language represents a significant portion of the people on the waiting list. The outreach must make clear the specific steps families must follow in order to apply to the HCV program of the PHA that will administer assistance following conversion.³
- E) A description of any procedures that will change when the public housing units are converted to HCV assistance, which shall cover at least:
 - i. Changes in termination and grievance procedures upon conversion from public housing to HCV.
 - ii. Changes in rent determinations, including the impact on rental payments (e.g., non-disabled tenants will no longer receive the Earned Income Disregard).
 - iii. Explanation of a resident's right to remain in the project(s) when converting under section 22 of the 1937 Act.
 - iv. Any differences in the treatment of resident organizations and protected activities impacted by the conversion to HCV.
 - v. Any changes in administration of the PHA's public housing FSS, ROSS, or CFCF programs (see paragraph (9) of this Notice).
 - vi. Changes in admissions or occupancy procedures.
 - vii. Changes to any remedial civil rights order or agreement, voluntary compliance agreement, final judgment, consent decree, settlement agreement, or other court order or agreement, in accordance with the terms of such

² For more information on complying with this requirement, consult the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, which HUD published in the *Federal Register* on January 22, 2007 (72 FR 2732).

³ When owners provide written or verbal communication to applicants or tenants, they must take steps to ensure effective communication with applicants, residents, and members of the public. HUD's regulation on effective communication with persons with disabilities is found at 24 CFR 8.6. Effective communications may include, but are not limited to, conducting outreach in a manner that will reach persons with disabilities, such as by working with State and local organizations that serve or represent persons with disabilities, and ensuring that information about their programs is disseminated in a manner that is accessible to persons with disabilities. For example, special communication systems (e.g., TTY for persons who are hearing or speech impaired, materials on tape or in Braille) can greatly increase the effectiveness of outreach and ongoing communication.

agreements, judgments, decrees, or orders and relevant statutory or regulatory authorities.

viii. Rescreening procedures upon entrance into the HCV program.

F) A description of how conversion will benefit residents, the PHA, and the community.

HUD will neither process nor approve an application for conversion under this Notice without a certification from the PHA that it has complied with these requirements. The PHA may be required to submit sufficient information to its local HUD Field Office of Public Housing in order to allow that office to determine that the PHA has complied with these requirements.

8) Required Elements of Conversion Plan

A) A PHA that intends to pursue conversion under this Notice must develop a conversion plan with significant participation by the residents of the project. The PHA must also consult with local government and other appropriate public officials about the conversion. The PHA must obtain a certification of consistency with the applicable Consolidated Plans in accordance with HUD's regulations at 24 CFR 91.2 and 903.15. In its conversion plan, a PHA must summarize resident comments received and describe how it took these comments into account in finalizing its conversion plan.

B) An applicant PHA with an approved Capital Fund Financing Program transaction, Section 30 PHA Mortgaged Transaction, or Operating Fund Financing Program must identify such financing to HUD as part of its conversion plan and indicate how it plans to retire such debt. The PHA must work with the respective HUD program office to assure all such financial obligations are satisfied prior to any conversion.

C) As described at 24 CFR 972.218(c), the conversion plan must include an analysis of the likely success of public housing residents in using tenant-based assistance in the rental market, taking into account the particular characteristics of such residents (such as large households or the presence of elderly or disabled family members).

D) For an applicant PHA that does not administer HCV assistance, the conversion plan must include a signed copy of the agreement between the PHA and the HCV agency that will be administering the HCV assistance (as described in paragraph (5)), pursuant to HUD's approval of the conversion plan.

E) All voluntary conversion plans must include a description of the PHA's intended plans for the project (physical asset and underlying land) after the public housing subsidy attached to the units is converted to tenant-based assistance. Depending on the project's location, condition, and other factors, the PHA may request to do one of the following with the project:

- i.** Dispose of the project to another entity (e.g., a non-profit or a Low-Income Housing Tax Credit (LIHTC) entity) via a negotiated sale, lease, or other transfer at or below the project's FMV so that the project can be maintained as rental housing for low-income families (i.e., families at or below 80 percent of area medium income (AMI)). The disposition requirements of section 18 of the 1937 Act and 24 CFR part 970 will apply. Because the conversion plan submitted to

HUD will include all of the information HUD needs to process a disposition action, no separate disposition application will be required. HUD will use the same review criteria to ensure section 18 compliance that is provided in HUD regulations and notices governing disposition of public housing. HUD will impose conditions on the use of disposed-of assets in its written approval of the disposition proposal. HUD will generally require the PHA to execute a use restriction or a similar recorded document in a form acceptable to HUD that assures the use of the project for a period of not less than 30 years. Typically such use restriction is recorded in a first-priority position against the property and survives the foreclosure of any mortgages or other liens on the property;

- ii.** Pursue HUD approval to retain the ownership of the project free and clear of all federal restrictions (i.e., request that HUD release the Declaration of Trust). Although under this action PHAs are generally required to compensate HUD for a project's value (HUD's participation in the cost of the original purchase as a percentage of the FMV) (24 CFR 85.31(c)(1)), 24 CFR 85.6(c) authorizes HUD to grant an exception to this requirement. HUD will generally grant such an exception if the project will be used as housing for low-income families after conversion, provided a use restriction is recorded against the property, as described in paragraph (i) above; or
- iii.** Dispose of the project to another entity via public bid at FMV with no requirement that the project be maintained as rental housing for low-income families. Proceeds from the disposition will be restricted to uses authorized under section 18(a)(5) of the 1937 Act, 42 U.S.C. 1437p(a)(5). The disposition requirements of section 18 of the 1937 Act and 24 CFR part 970 will apply. No separate disposition application will be required.

Any of these proposed future uses will be subject to Environmental Review. Prior to taking action to implement its plans for the project, the PHA must submit sufficient information to its local HUD Field Office of Public Housing in order to allow that office to indicate that one of the following has occurred: (1) the Environmental Review was completed by HUD under 24 CFR part 50 for the proposed action, and the action is environmentally acceptable; (2) the Environmental Review was completed by a Responsible Entity under 24 CFR part 58, and HUD has approved a Request for Release of Funds; or (3) a Responsible Entity under 24 CFR part 58 has made a determination that the project or activity is exempt under 24 CFR 58.34(a)(12) because the project or activity is categorically excluded under 24 CFR 58.35(a)(4) or (5) and none of the related environmental laws is triggered.

PHAs are reminded that the PHA's plans for reuse of the public housing property or site, the use of tenant-based assistance in a special housing type under 24 CFR 982 subpart M, or the proposed PBV housing, is subject to site and neighborhood

standards established pursuant to Title VI of the Civil Rights Act and the Fair Housing Act.⁴

F) The conversion plan must include a relocation plan that contains all information identified in 24 CFR 972.230(g)(1)–(4). To the extent that tenants are displaced as a direct result of the demolition, acquisition, or rehabilitation of real property for a project that receives HCV tenant-based assistance through the voluntary conversion of public housing as described in this Notice, the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601–4655), and the implementing regulations at 49 CFR part 24, apply. For purposes of this paragraph, the term “project” is defined at 49 CFR 24.2(a)(22); the URA may therefore apply even if federal funds do not pay for the demolition, acquisition, or rehabilitation that causes displacement.⁵ If voluntary conversion as described in this Notice is subject to the URA, then the PHA must also comply with the requirements in 24 CFR 972.230(g)(5). In preparing their relocation plans, applicant PHAs should refer to HUD Handbook 1378 for guidance regarding HUD real estate acquisition and relocation policy and procedures. Specifically, Chapter 3 contains guidance on providing relocation assistance for families and individuals and includes some guidance on accessibility requirements and reasonable accommodations for displaced persons with disabilities.

G) The conversion plan must include a statement of compliance with all applicable nondiscrimination and equal opportunity requirements, including but not limited to those specified in HUD’s regulations at 24 CFR 5.105(a).

9) Resident Services and CFCF Program. The information in this paragraph applies to any applicant PHA that operates a Public Housing Family Self-Sufficiency (PH FSS), Resident Opportunities and Self-Sufficiency – Service Coordinator (ROSS-SC), or Capital Fund Education and Training Community Facilities (CFCF) program:

A) The following requirements apply to an applicant PHA that operates a PH FSS program:

- i.** No later than the effective date of conversion,⁶ the applicant PHA must disburse escrow funds (in accordance with 24 CFR 984.305(c)) to participating families that have met their obligations under their Contract of Participation or otherwise completed their contract (see 24 CFR 984.303(g)) and are welfare-free.
- ii.** For participating families that have not met their obligations and are not welfare-free as of the effective date of conversion, HUD encourages any applicant PHA that operates a PH FSS program to honor its Contracts of Participation by transferring participating residents to an HCV FSS program. For example, an applicant PHA that does not operate an HCV FSS program

⁴ For more information, see HUD’s regulations (e.g., 24 CFR 905.602(d) and 983.57).

⁵ URA resources and guidance, including contact information for HUD’s Regional Relocation Specialists, are available on HUD’s Real Estate Acquisition and Relocation Web site at <http://www.hud.gov/relocation>.

⁶ The effective date is the date in IMS/PIC that indicates when the units have been removed from the PHA’s ACC public housing inventory and DOT.

has the option of either establishing such a program or transferring administration of its HCVs to a PHA that operates an HCV FSS program. If an applicant PHA is unable to transfer participating families to an HCV FSS program, then the PHA must, upon conversion to the HCV program, terminate the family's participation in the PH FSS program. In accordance with section 23(d)(2) of the 1937 Act, the Secretary has determined that in this case there is good cause and an exception is warranted to permit the disbursement of the escrowed funds to the family, regardless of whether the family has completed its Contract of Participation and is welfare-free.

- iii. An applicant PHA may continue to serve PH FSS families using already-granted funds until the participants' Contracts of Participation have been completed.

An applicant PHA that has converted its assistance pursuant to this Notice may not enroll new participants in its PH FSS program following conversion.

- B) If the applicant PHA operates a ROSS-SC program, program grants would need to be closed in accordance with their grant terms. Applicant PHAs have more than one option for operating these grants until close-out:
 - i. The applicant PHA may continue to operate its program until the agreement is closed out, but it may not apply for new ROSS-SC program funding.
 - ii. The applicant PHA may transfer its program to another PHA. PHAs who are interested in pursuing this option should contact their local HUD Field Office of Public Housing for guidance.
- C) If the PHA was awarded a CFCF grant, then the PHA must return the grant amount prior to conversion or complete the project. After completion of the project, HUD will require recordation of a 40-year use agreement at conversion before termination of the Annual Contributions Contract (ACC) Amendment. If conversion under this Notice results in the applicant PHA being unable to fulfill the purpose for which the grant was awarded, then the grant amount shall be returned to HUD through either a section 18 disposition or in accordance with 24 CFR 85.31.

10) Submission, Review, and Approval of Application and Conversion Plan. A PHA applying for conversion under this Notice must submit the materials described below no later than close of business on September 30, 2014 (5:00 PM Eastern Daylight Time):

- A) The PHA must submit its conversion application and plan to HUD via the Inventory Removals Sub-module of the Inventory Management System/PIH Information Center (IMS/PIC). Each PHA must complete the questions on the electronic application (HUD-52860), including the required certification (supported by attachments, as applicable).
- B) Completion of the HUD-52860-E addendum is not required; instead, documentation demonstrating fulfillment of the conversion plan and public and resident consultation requirements, described in paragraph (8) above, must be included as attachments with the PHA's electronic submission.
- C) All applications received by close of business on September 30, 2014, will be reviewed initially by the Special Applications Center (SAC) for completeness. HUD will not

process an application/voluntary conversion plan found to be deficient on a substantial item or incomplete. If a PHA submits an application that is deficient or incomplete, the SAC will reject the application in a formal letter to the PHA and register the application's status as "inactive" in IMS/PIC. An application that is determined to be complete will be considered an "eligible application."

- D)** Once a PHA's application is determined to be eligible, PIH will notify the Office of Fair Housing and Equal Opportunity (FHEO) that the electronic application and attachments are available for a front-end civil rights review. The purpose of the review is to identify and address outstanding civil rights matters, including but not limited to identifying active fair housing and other civil rights-related complaints or reviews; ensuring that appropriate parties maintain or assume the responsibility for satisfying the terms of a civil rights agreement or order; and ensuring compliance with the PHA's obligations under the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, Titles II and III of the Americans with Disabilities Act, and other applicable nondiscrimination and equal opportunity authorities.

All eligible applications will be reviewed for compliance with the requirements of this Notice, including any applicable requirements described in Appendix B. HUD will disapprove an eligible application/conversion plan that fails to meet such requirements.

Subject to the availability of appropriations, applications that meet the requirements of this Notice will be funded on a first-come, first-serve basis until the 1,000 TPVs have been exhausted. The Department may, subject to the availability of appropriations, make available additional TPVs, for example to provide for full funding of the final application, if funding that application will push TPV issuance above the 1,000 TPV threshold.

A PHA must obtain written approval of its conversion plan from HUD Headquarters before proceeding to implement the plan.

- 11) Troubled Agencies.** A PHA that is designated "troubled" under the Public Housing Assessment System is eligible to apply to convert a project under this Notice.
- 12) Income Eligibility and Family Screening.** In order to receive a TPV, a family must be a low-income family. A low-income family is a family whose annual income does not exceed 80 percent of the median income for the area as determined by HUD.

In addition, the PHA must screen families for eligibility of assistance consistent with the requirements in 24 CFR 982.552 and 982.553. The screening of families and decisions to deny admissions to the voucher program must be the same as the PHA policy for screening of regular admissions of families from the PHA waiting list.

The PHA must provide a family with an opportunity for an informal review if it denies the family admission to the voucher program in accordance with 24 CFR 982.554.

- 13) Right to Remain.** Under section 22 of the 1937 Act, a PHA's conversion plan must "ensure that, if the project (or a portion) converted is used as housing after conversion, each resident may choose to remain in the dwelling unit in the project and use the tenant-based [voucher] for rent." In this case, if a family meets the requirements noted in paragraph (12) of this Notice and receives a voucher, then the owner must accept the voucher and lease the unit to the family. The voucher assistance must be administered by the PHA (or the voucher PHA

that agrees to administer the assistance pursuant to paragraph (5) of this Notice) in accordance with the requirements in 24 CFR Part 982.

In all cases, residents of a project undergoing conversion may voluntarily accept a PHA's offer to move permanently to another assisted unit, and thereby waive their right to remain or return to the redeveloped property after rehabilitation or redevelopment is completed. If a resident is temporarily relocated for a period that exceeds 12 months and the relocation is subject to the URA, the PHA would be required to offer permanent relocation assistance to the resident, including a referral to a comparable replacement unit. The PHA would be prohibited from asking the resident to waive their relocation assistance (though the resident may voluntarily choose not to accept the offered assistance). It should be noted that the URA does not require a right of return policy.

14) Termination of Annual Contributions Contract. Since conversion actions under this Notice will convert all of a PHA's remaining public housing to HCVs, the action will terminate the PHA's public housing ACC with HUD. The PHA must comply with all HUD requirements to close-out its public housing program, including those pertaining to the Operating Fund, the Capital Fund, and Audits. In addition, the PHA will be ineligible for Demolition and Disposition Transitional Funding under 24 CFR Part 905. Units approved by HUD for voluntary conversion are ineligible for an Asset Repositioning Fee.

If a PHA that intends to terminate its public housing ACC owns any non-dwelling property (e.g., vacant land, playgrounds, administrative buildings, community buildings) that it acquired, maintained, or operated with 1937 funds (and is under an ACC and Declaration of Trust (DOT) in favor of HUD), then the PHA must request, as part of its voluntary conversion application, to either dispose of such property in accordance with Section 18 of the 1937 Act or retain it free from federal restrictions in accordance with 24 CFR Part 85. The PHA must identify any tangible or personal property acquired with 1937 Act funds that are included as part of the request.

Paperwork Reduction Act. The information collection requirements contained in this Notice are approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). The OMB control numbers are 2577-0075, 2577-0169, 2577-0226, and 2577-0276.

/s/

Sandra B. Henriquez, Assistant Secretary for
Public and Indian Housing

Appendices

[Appendix A](#)

[Appendix B](#)