

# **Final PHA Agency Plan**

## **Annual Agency Plan for Fiscal Year 2019**



**Stanley Brezenhoff**  
**Interim Chair & Chief Executive Officer**

**Date: October 18, 2018**

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires: 02/29/2016</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

**Applicability.** Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information					
A.1	<p><b>PHA Name:</b> New York City Housing Authority <b>PHA Code:</b> NY005</p> <p><b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p><b>PHA Plan for Fiscal Year Beginning:</b> 01/2018</p> <p><b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p><b>Number of Public Housing (PH) Units 175,636; Number of Section 8 Vouchers: 84,994. Total Combined Units/Vouchers 261,214</b></p> <p><b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p>					
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
					PH	HCV
	Lead PHA:					

<b>B.</b>	<b>Annual Plan Elements</b>
<b>B.1</b>	<p><b>Revision of PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>Please see Attachment A (PHA Plan Update)</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p> <p>Please see Attachment F (Admissions Policy for Deconcentration)</p>
<b>B.2</b>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p>

	<input checked="" type="checkbox"/> <input type="checkbox"/> Non-Smoking Policies. <input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers. <input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).  (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.  Please see Attachment B and C (HOPE VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership, and Project-Based Vouchers, and Capital Improvements – Capital fund annual statement).  <i>As of September 1, 2018 NYCHA has executed 94 HAP contracts for 6,772 project based units receiving subsidy across the five boroughs in New York City. This includes project-based apartments at NYCHA's LLC mixed finance developments.</i>
<b>B.3</b>	<b>Civil Rights Certification.</b>  Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.
<b>B.4</b>	<b>Most Recent Fiscal Year Audit.</b>  (a) Were there any findings in the most recent FY Audit? Y N  <input type="checkbox"/> <input checked="" type="checkbox"/>  (b) If yes, please describe: Please see Attachment A (PHA Plan Update)
<b>B.5</b>	<b>Progress Report.</b>  Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.  Please see Attachment E (Additional Information)
<b>B.6</b>	<b>Resident Advisory Board (RAB) Comments.</b>  (a) Did the RAB(s) provide comments to the PHA Plan?  Y N  <input checked="" type="checkbox"/> <input type="checkbox"/>  (c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.  Please see Attachment M (Comments from the Resident Advisory Board [RAB] Members).
<b>B.7</b>	<b>Certification by State or Local Officials.</b>  Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.
<b>B.8</b>	<b>Troubled PHA.</b>  (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y N N/A  <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>

	(b) If yes, please describe:
<b>C.</b>	<p><b>Statement of Capital Improvements.</b> Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p> <p>Please see Attachment C (Capital Improvements – Capital fund annual statement)</p>
<b>C.1</b>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>HUD APPROVED NYCHA'S FY 2018 CAPITAL FUND GRANT ON AUGUST 30, 2018 AND 5-YEAR ACTION PLAN ON JUNE 19, 2018.</p>

## Supporting Documents Available for Review

Members of the public wishing to examine the Supporting Documents may do so, during regular business hours, by contacting NYCHA’s central office, located at 250 Broadway, New York, New York, at (212) 306-3701 to schedule an appointment to review the documents.

<b>List of Supporting Documents Available for Local Review</b> <i>(Applicable to All PHA Plan Types)</i>		
Indicate which documents are available for public review by placing a mark in the “Applicable & On Display” column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	Form HUD-50077, <i>Standard PHA Certifications of Compliance with the PHA Plans and Related Regulations: Board Resolution to Accompany the Standard Annual, Standard Five-Year, and Streamlined Five-Year/Annual PHA Plans.</i>	Standard 5-Year and Annual Plans  Streamlined 5-Year Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5-Year and Annual Plans  5-Year Streamlined Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5-Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments (AI) to Fair Housing Choice); and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan:  Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan:  Financial Resources
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan (TSAP) and the Site-Based Waiting List Procedure.  <i>The following Management and Maintenance Policies are available and on display:</i> <ul style="list-style-type: none"> <li>• <i>NYCHA Management Manual</i></li> <li>• <i>NYCHA Application and Tenancy Administration Manual</i></li> <li>• <i>NYCHA Tenant Selection and Assignment Plan (TSAP) Manual</i></li> <li>• <i>NYCHA Human Resources Manual</i></li> <li>• <i>NYCHA Emergency Procedure Manual</i></li> <li>• <i>NYCHA Contract Procedure Resolution</i></li> <li>• <i>NYCHA General Memoranda</i></li> <li>• <i>NYCHA Deputy General Manager Memoranda</i></li> <li>• <i>NYCHA Standard Procedures</i></li> </ul>	Annual Plan: Eligibility, Selection, and Admissions Policies

**List of Supporting Documents Available for Local Review**  
**(Applicable to All PHA Plan Types)**

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<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Deconcentration Income Analysis <i>NYCHA’s Deconcentration Income Analysis begins on page 198 of the Final Annual Plan.</i>	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Any policy governing occupancy of Police Officers and Over-Income Tenants in Public Housing. <input type="checkbox"/> Check here if included in the public housing A&O Policy.  <i>NYCHA’s policy governing the occupancy of Police Officers is available in NYCHA’s Management Manual in Chapter III, NYCHA’s Standard Procedure SP003011 and on page 40 of the Final Annual Plan.</i>	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents. <input type="checkbox"/> Check here if included in the public housing A & O Policy.  <i>NYCHA’s rent determination policies are available in NYCHA’s Management Manual in Chapter III (page 106) and on page 45 of the Final Annual Plan.</i>	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development. <input type="checkbox"/> Check here if included in the public housing A & O Policy.  <i>NYCHA’s Flat Rent schedule is on page 47 of the Final Annual Plan and in NYCHA’s Management Manual in Chapter III beginning on page 106.</i>	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies (if included in plan, not necessary as a supporting document) and written analysis of Section 8 payment standard policies. <input checked="" type="checkbox"/> Check here if included in the Section 8 Administrative Plan.  <i>Section 8 rent determination (payment standard) policies are outlined in Chapter IX of the Section 8 Administrative Plan and on page 47 of the Final Annual Plan.</i>	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation).	Annual Plan: Operations and Maintenance
X	Results of latest Public Housing Assessment System (PHAS) assessment	Annual Plan: Operations and Maintenance
X	Results of latest Section 8 Management Assessment System (SEMAP).	Annual Plan: Operations and Maintenance
X	Any policies governing any Section 8 special housing types <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.  <i>Section 8 special housing types are outlined in Chapter XV (B) of the Section 8 Administrative Plan.</i>	Annual Plan: Management and Operations
X	Public housing grievance procedures <input type="checkbox"/> Check here if included in the public housing A & O Policy.  <i>NYCHA’s grievance procedures are outlined in Chapter IV Section IV (A) of the NYCHA Management Manual.</i>	Annual Plan: Grievance Procedures

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<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
X	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.  <i>NYCHA’s informal review and hearing procedures are outlined in Chapter XXIV (B) of the Section 8 Administrative Plan.</i>	Annual Plan: Grievance Procedures
X	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement/Performance and Evaluation Report (form HUD-52837) for the active grant year	Annual Plan: Capital Needs
X	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
X	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
X	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
X	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act, Section 22 of the U.S. Housing Act of 1937, or Section 33 of the U.S. Housing Act of 1937.	Annual Plan: Conversion of Public Housing
X	Documentation for required Initial Assessment and any additional information required by HUD for Voluntary Conversion.  <i>Please see page 114 of the Final Annual Plan for information on the Voluntary Conversion of NYCHA’s public housing.</i>	Annual Plan: Voluntary Conversion of Public Housing
X	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
N/A	Policies governing any Section 8 Homeownership program  <i>NYCHA does not have a Section 8 Homeownership program at this time.</i>	Annual Plan: Homeownership
X	Public Housing Community Service Policy/Programs  <input type="checkbox"/> Check here if included in the public housing A & O Policy.  <i>NYCHA’s Community Service Policy is outlined in NYCHA Form 040.564 and in the Final Annual Plan on page 204.</i>	Annual Plan: Community Service & Self-Sufficiency
X	Cooperative agreement between the PHA and the TANF agency and between the PHA and local employment and training service agencies.	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8.	Annual Plan: Community Service & Self-Sufficiency
X	Section 3 documentation required by 24 CFR Part 135, Subpart E for public housing.	Annual Plan: Community Service & Self-Sufficiency



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**(Applicable to All PHA Plan Types)**

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<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
X	Most recent self-sufficiency ROSS or other resident services grant) grant program reports for public housing.	Annual Plan: Community Service & Self-Sufficiency
X	Policy on Ownership of Pets in Public Housing Family Developments (as required by regulation at 24 CFR Part 960, Subpart G). <input type="checkbox"/> Check here if included in the public housing A & O Policy.  <i>NYCHA’s Policy on Ownership of Pets in Public Housing Family Developments is outlined in NYCHA Form 040.537 and in the Final Annual Plan beginning on page 85.</i>	Annual Plan: Pet Policy
X	The results of the most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U. S.C. 1437c(h)), the results of that audit and the PHA’s response to any findings	Annual Plan: Annual Audit
X	Other supporting documents (optional)  <i>New York Police Department Housing Bureau Strategic Plan</i>	Annual Plan: Safety and Crime Prevention

**NOTICE**

***New York City Housing Authority Significant Amendment to the FY 2018 Agency Annual Plan and the Draft Agency Plan for FY 2019***

The public is advised that the *Significant Amendment to the FY 2018 Agency Annual Plan and the FY 2019 Draft Agency Annual Plan* will be available for public inspection at NYCHA’s principal office, located at 250 Broadway, New York, NY, starting April 6, 2018 between the hours of 9:30 a.m. to 4:30 p.m. Please call (212) 306-3701 to make an appointment to review the *Significant Amendment to the FY 2018 Agency Annual Plan and the FY 2019 Agency Annual Plan* and supporting documents. The *Significant Amendment to the FY 2018 Agency Annual Plan and the FY 2019 Draft Agency Annual Plan* will also be available at the following locations:

- On NYCHA’s webpage, which is located on: <http://www1.nyc.gov/site/nycha/about/annual-plan-financialinformation.page>
- At the Management Office of *each* NYCHA public housing development during regular business hours.
- At the Community Centers/Borough Offices listed below during the hours of 9:00 am to 7:30 pm:

<p>Manhattan Family Partnerships Borough Office 45 Allen Street New York, New York</p> <p>Taft Senior Center 1365 5th Avenue New York, New York</p> <p>Sedgwick Senior Center 1553 University Avenue Bronx, New York</p>	<p>Soundview Senior Center 1674 Seward Avenue Bronx, New York</p> <p>Queens Community Development / Family Partnerships Borough Office 70-30 Parsons Boulevard Flushing, New York</p>	<p>Staten Island Family Partnerships Borough Office 90 Lafayette Avenue Staten Island, New York</p> <p>Brownsville Senior Center 528 Mother Gaston Boulevard Brooklyn, New York</p>
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**PUBLIC COMMENT**

The public is invited to comment on the *Significant Amendment to the FY 2018 Agency Annual Plan and the FY 2019 Draft Agency Annual Plan* at a public hearing to be held on **Tuesday, May 22, 2018** from 5:30 p.m. to 8:00 p.m. at

**Borough Of Manhattan Community College  
199 Chambers Street  
New York, New York 10007**

*The location listed above is both handicapped accessible and can be reached using public transportation. For transportation information go to <http://tripplanner.mta.info> or call the MTA/NYC Transit Travel Information Line (718) 330-1234.*

Written comments regarding the *Significant Amendment to the FY 2018 Agency Annual Plan and the FY 2019 Draft Agency Annual Plan* are encouraged. To be considered, **submissions must be received via United States Postal mail or fax no later than May 23, 2018**. Faxed submissions will be accepted at (212) 306-7905. Comments may be sent to the following address and comments may also be emailed to [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov).

**Public Housing Agency Plan Comments  
Church Street Station  
P.O. Box 3422  
New York, New York 10008-3422**

Bill de Blasio, Mayor

Shola Olatoye, Chair and Chief Executive Officer

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## AVISO

### ***Enmienda Significativa de la Autoridad de Vivienda de la Ciudad de Nueva York al Plan anual de la agencia para el Año fiscal 2018 y al Proyecto de plan de la agencia para el Año fiscal 2019***

Se anuncia al público que la Enmienda significativa propuesta al Plan anual de la agencia para el año fiscal 2018 y el Proyecto de plan de la agencia para el Año fiscal 2019 estará disponible para su inspección pública en la oficina central de NYCHA ubicada en 250 Broadway, New York, NY, a partir del 6 de abril de 2018 entre las 9:30 a.m. y las 4:30 p.m. Por favor llame al (212) 306-3701 para concertar una cita para revisar la Enmienda significativa propuesta al Plan anual de la agencia para el año fiscal 2018 y el Proyecto de plan de la agencia para el Año fiscal 2019 y los documentos de respaldo. La Enmienda significativa al Plan anual de la Agencia para el año fiscal 2018 y el Proyecto de plan de la agencia para el Año fiscal 2019 también estarán disponibles en los siguientes lugares:

- En la Página Web de NYCHA, que se encuentra en: <http://www1.nyc.gov/site/nycha/about/annual-plan-financial-information-page>
- En la oficina de la administración de cada residencial de vivienda pública de NYCHA durante horas de oficina regulares.
- En los centros comunitarios/oficinas municipales que se enumeran a continuación entre las 9:00 a.m. y las 7:30 p.m.:

Asociaciones familiares de Manhattan Oficina Municipal 45 Allen Street New York, New York	Centro para personas de la tercera edad Soundview 1674 Seward Avenue Bronx, New York	Asociaciones familiares de Staten Island Oficina Municipal 90 Lafayette Avenue Staten Island, New York
Centro para personas de la tercera edad Taft 1365 5th Avenue New York, New York	Desarrollo comunitario de Queens/Asociaciones familiares Oficina Municipal 70-30 Parsons Boulevard Flushing, New York	Centro para personas de la tercera edad Brownsville Brownsville Senior Center Brooklyn, New York
Centro para personas de la tercera edad Sedgwick 1553 University Avenue Bronx, New York		

### **COMENTARIOS DEL PÚBLICO**

Se invita al público a comentar sobre la Enmienda significativa al Plan anual de la Agencia para el Año fiscal 2018 y el Proyecto de plan de la agencia para el Año fiscal 2019 en una audiencia pública que se celebrará el martes, 22 de mayo del 2018, de 5:30 p.m. a 8:00 p.m. en:

**Borough of Manhattan Community College  
199 Chambers Street  
New York, New York 10007**

*La ubicación indicada arriba es accesible para personas con limitaciones físicas y se puede llegar a ella utilizando transporte público. Para obtener información sobre el transporte, vaya a <http://tripplanner.mta.info> o llame a la Línea de información de Viajes de Tránsito MTA/NYC al (718) 330-1234.*

Le animamos a hacer comentarios por escrito sobre la Enmienda significativa al Plan anual de la Agencia para el año fiscal 2018 y el Proyecto de plan de la agencia para el Año fiscal 2019. Para ser considerados, **los comentarios deben recibirse mediante correo postal de los Estados Unidos o fax a más tardar el 23 de mayo de 2018.** Los comentarios escritos pueden enviarse por fax al (212) 306-7905. Los comentarios pueden enviarse a la siguiente dirección y los comentarios también pueden ser enviados por correo electrónico a [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov).

**Public Housing Agency Plan Comments  
Church Street Station  
P.O. Box 3422  
New York, New York 10008-3422**

Bill de Blasio, Alcalde

Shola Olatoye, Presidenta y Primera Ejecutiva

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## 通知

### 紐約市房屋局「2018 財政年度公共房屋機構年度計劃」重大修正案及 「2019 財政年度公共房屋機構計劃」初稿

從2018年4月6日起，民眾可於上午9時30分至下午4時30分前往紐約市房屋局辦公總樓查閱「2018財政年度機構計劃」重大修正案和「2019財政年度機構計劃」初稿，地址：紐約市曼哈頓百老匯大道250號(250 Broadway, New York, NY)。請致電(212) 306-3701 預約時間查閱「2018財政年度機構計劃」重大修正案和「2019財政年度機構計劃」初稿及相關證明文件。

民眾還可通過下列方式索取或下載「2018 財政年度機構計劃」重大修正案和「2019財政年度機構計劃」初稿：

- 紐約市房屋局 (NYCHA) 官方網站，網址：  
<http://www1.nyc.gov/site/nycha/about/annual-plan-financialinformation.page>
- 辦公時間前往紐約市房屋局轄下公房區管理處
- 早上9時至晚上7時30分，前往下列社區中心/區域事務辦公室：

<p>Manhattan Family Partnerships 曼哈頓維爾家庭合作部 區域辦公室 45 Allen Street New York, New York</p> <p>Taft Senior Center 塔美特公房長者中心 1365 5th Avenue New York, New York</p> <p>Sedgwick Senior Center 塞奇威克公房長者中心 1553 University Avenue Bronx, New York</p>	<p>Soundview Houses Senior Center 桑維爾公房長者中心 1674 Seward Avenue Bronx, New York</p> <p>Queens Community Development / Family Partnerships 皇后區社區發展/家庭合作部辦公室 區域辦公室 70-30 Parsons Blvd Flushing, New York</p>	<p>Staten Island Community Operations Borough Office 史坦頓島家庭合作部 區域辦公室 90 Lafayette Avenue Staten Island, New York</p> <p>Brownsville Senior Center 布朗斯維爾公房長者中心 528 Mother Gaston Boulevard Brooklyn, New York</p>
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### 公眾意見

我們還誠邀各界人士出席於2018年5月22日，星期二，下午5時30分至晚上8時舉行的公共聽證會，對「2018 財政年度機構計劃」重大修正案和「2019財政年度機構計劃」初稿發表意見並提出建議。

地點如下：

**Borough Of Manhattan Community College  
199 Chambers Street  
New York, New York 10007**

上述會議地點設有無障礙通道方便殘疾人士進出並可乘搭公共交通工具抵達。詳情請瀏覽：<http://tripplanner.mta.info> 或致電大都會捷運局 (MTA) 紐約市交通旅遊諮詢熱線查詢，電話：(718) 330-1234。

歡迎各界人士對「2018 財政年度機構計劃」重大修正案和「2019財政年度機構計劃」初稿發表書面意見。我們僅會考慮於2018年5月23日前以傳真或平郵方式提交的意見書。傳真號碼：(212) 306-7905。意見書可寄至下列地址或發送電郵至：[annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov)。

**Public Housing Agency Plan Comments  
Church Street Station  
P.O.Box 3422  
New York, New York**

百思豪 (Bill de Blasio), 市長

索拉·奧拉托耶, (Shola Olatoye), 主席兼行政總監

## УВЕДОМЛЕНИЕ

**Значительная поправка Жилищного управления г. Нью-Йорка (New York City Housing Authority, NYCHA) к Годовому плану агентства на 2018 финансовый год и проект Годового плана агентства на 2019 финансовый год**

Настоящим извещаем, что *Значительная поправка (Significant Amendment)* к Годовому плану агентства на 2018 финансовый год (FY 2018) и проект Годового плана агентства на FY 2019 будут доступны для публичного ознакомления в главном офисе NYCHA, который находится по адресу: 250 Broadway, New York, NY, начиная с 6 апреля 2018 года с 9:30 а.м. до 4:30 р.м. Для ознакомления с этими и другими сопроводительными документами позвоните по тел. (212) 306-3701 и назначьте встречу. Также эти документы можно найти:

- На вебсайте NYCHA <http://www1.nyc.gov/site/nycha/about/annual-plan-financialinformation.page>
- В офисе управления *каждого* жилищного комплекса NYCHA в обычные приемные часы.
- В нижеуказанных местных общественных центрах (Community Centers)/районных управлениях с 9:00 а.м. до 7:30 р.м.:

Manhattan Family Partnerships Районный офис: 45 Allen Street New York, New York	Центр для пожилых Soundview 1674 Seward Avenue Bronx, New York	Staten Island Family Partnerships Районный офис: 90 Lafayette Avenue Staten Island, New York
Центр для пожилых (Senior Center) Taft 1365 5th Avenue New York, New York	Queens Community Development / Family Partnerships Районный офис: 70-30 Parsons Boulevard Flushing, New York	Центр для пожилых Brownsville 528 Mother Gaston Boulevard Brooklyn, New York
Центр для пожилых Sedgwick 1553 University Avenue Bronx, New York		

### **КОММЕНТАРИИ ОБЩЕСТВЕННОСТИ**

Общество также приглашается предоставить комментарии по поводу *Значительной поправки к Годовому плану агентства на FY 2018 и проекту Годового плана агентства на FY 2019* на публичном слушании, которое состоится **во вторник, 22 мая 2018 года** с 5:30 р.м. до 8:00 р.м. по адресу:

**Borough of Manhattan Community College  
199 Chambers Street  
New York, New York 10007**

Вышеуказанное место проведения мероприятия оборудовано для доступа инвалидов, и туда можно добраться общественным транспортом. Для получения информации о том, как добраться туда общественным транспортом, пользуйтесь страницей на Интернетe <http://tripplanner.mta.info> или звоните в Транспортное управление МТА/NYC Transit Travel Information Line по тел. (718)330-1234.

Письменные отзывы по поводу *Значительной поправки к Годовому плану агентства на FY 2018 и проекту Годового плана агентства на FY 2019* приветствуются. Чтобы их учли, **они должны быть получены по почте (United States Postal mail) не позже 23 мая 2018 года**. Комментарии по факсу будут приниматься по номеру (212) 306-7905. Отзывы также можно выслать по адресам: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov). и

**Public Housing Agency Plan Comments  
Church Street Station  
P.O. Box 3422  
New York, New York 10008-3422**

Bill de Blasio, мэр

Shola Olatoye, председатель и исп. директор



**Public Hearing on the Significant Amendment to  
the Fiscal Year 2018 Agency Annual Plan and the  
Draft Fiscal Year 2019 Annual Plan**



**Join the conversation and  
get informed on issues  
impacting your home and  
community.**

**Can't attend in person?  
Watch the LIVE video stream  
and read highlights of the  
meeting presentation at:**



**[on.nyc.gov/nycha-fy19](http://on.nyc.gov/nycha-fy19)**

## Public Hearing

Tuesday, May 22, 2018  
5:30 pm to 8:00 pm

Borough of Manhattan  
Community College  
199 Chambers Street  
New York, NY 10007

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[www.nyc.gov/nycha](http://www.nyc.gov/nycha)



Requests for reasonable accommodation for this event should be relayed to the NYCHA Public Accessibility Services Coordinator, Paola Vernelly, by May 14, 2018, at 212-306-4617 or by email at [Paola.Vernelly@nycha.nyc.gov](mailto:Paola.Vernelly@nycha.nyc.gov).



**AUDIENCIA PÚBLICA SOBRE LA ENMIENDA SIGNIFICATIVA AL  
PLAN ANUAL DE LA AGENCIA DEL AÑO FISCAL 2018 Y EL  
PROYECTO DE PLAN ANUAL DEL AÑO FISCAL 2019**



**Únase a la conversación e  
infórmese sobre los temas  
que impactan a su hogar y su  
comunidad.**

**¿No puede asistir en  
persona? Vea la transmisión  
de vídeo en directo y lea los  
aspectos más destacados de  
la presentación de la reunión  
en:**



**[on.nyc.gov/nycha-fy19](http://on.nyc.gov/nycha-fy19)**

**Audiencia Pública**

**Martes 22 de mayo de 2018  
5:30 p.m. a 4:00 p.m.**

**Borough of Manhattan  
Community College 199  
Chambers Street New  
York, NY 10007**

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Internet en [www.nyc.gov/nycha](http://www.nyc.gov/nycha)**

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Las solicitudes de alojamiento razonable para este evento deben ser transmitidas a la Coordinadora de Servicios de Accesibilidad Pública de NYCHA, Paola Vernelly, hasta el 14 de mayo de 2018, al 212-306-4617 o por correo electrónico a Paola.Vernelly@nycha.nyc.gov.



「2018 財政年度公共房屋機構年度計劃」  
重大修正案及「2019 財政年度公共房屋  
機構年度計劃」初稿公眾聽證會



踴躍參與，共同討論，  
關注住房和社區發展動  
向。

無法親自出席會議？歡迎  
上網觀看會議現場直播並  
查看諮詢會議的簡報重  
點，網址：

[on.nyc.gov/nycha-fy19](http://on.nyc.gov/nycha-fy19)



## 公眾聽證會

2018 年 5 月 22 日，星期二  
下午 5 時 30 分至  
晚上 8 時

Borough of Manhattan  
Community College  
紐約市立大學曼哈頓  
社區學院  
199 Chambers Street New  
York, NY 10007



如對這次會議活動有任何合理便利措施的要求，請於 2018 年 5 月 14 日前聯繫紐約市房屋局公共無障礙服務專員 Paola Vernelly，電話：212-306-4617 或電郵：Paola.Vernelly@nycha.nyc.gov。





Публичное слушание по поводу Значительной поправки к Годовому плану агентства на FY 2018 и проекту Годового плана агентства на FY 2019



Присоединяйтесь к разговору и получите информацию по вопросам, затрагивающим ваш дом и микрорайон.

Не можете присутствовать лично? Смотрите в ПРЯМОМ ЭФИРЕ видео и читайте основные моменты презентации на:



[on.nyc.gov/nycha-fy19](http://on.nyc.gov/nycha-fy19)

Публичное слушание  
Вторник, 22 мая 2018 г.  
с 5:30 pm до 8:00 pm

Borough of Manhattan  
Community College  
199 Chambers Street  
New York, NY 10007

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所居公房管理處和房屋局網站  
(網址: [www.nyc.gov/nycha](http://www.nyc.gov/nycha)) 備有文件譯本可供索取

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Запросы на приемлемую модификацию (reasonable accommodation) во время этого мероприятия должны быть переданы координатору общественных услуг NYCHA Paola Vernelly до 14 мая 2018 года по тел. 212-306-4617 или электронной почтой по адресу [Paola.Vernelly@nycha.nyc.gov](mailto:Paola.Vernelly@nycha.nyc.gov).

## FY 2019 Final PHA Annual Plan Table of Contents

<b>EXECUTIVE SUMMARY .....</b>	<b>20</b>
<b>ATTACHMENT A: PHA PLAN UPDATE.....</b>	<b>32</b>
PHA PLAN ELEMENTS UPDATED .....	32
LOCATIONS OF COPIES OF THE FINAL ANNUAL PHA PLAN.....	32
PHA PLAN ELEMENTS .....	33
1. Eligibility, Selection and Admissions Policies.....	33
2. Financial Resources .....	43
3. Rent Determination .....	45
4. Operation and Management.....	49
5. PHA Grievance Procedures .....	50
6. Designated Housing for Elderly and Disabled Families.....	51
7. Community Service and Self-Sufficiency .....	74
8. Safety and Crime Prevention.....	81
9. Pet Policy .....	85
10. Civil Rights Certification.....	86
11. Fiscal Year Audit.....	86
12. Asset Management.....	86
13. Violence Against Women Act (VAWA) .....	87
<b>ATTACHMENT B: HOPE VI, MIXED FINANCE MODERNIZATION OR DEVELOPMENT, DEMOLITION AND/OR DISPOSITION, CONVERSION OF PUBLIC HOUSING, HOMEOWNERSHIP, AND PROJECT-BASED VOUCHERS.....</b>	<b>88</b>
<i>HOPE VI OR MIXED FINANCE MODERNIZATION OR DEVELOPMENT.....</i>	<i>88</i>
<i>DEMOLITION AND/OR DISPOSITION .....</i>	<i>93</i>
<i>CONVERSION OF PUBLIC HOUSING .....</i>	<i>114</i>
<i>HOMEOWNERSHIP .....</i>	<i>117</i>
<i>PROJECT-BASED VOUCHERS.....</i>	<i>118</i>
<i>RENTAL ASSISTANCE DEMONSTRATION PROGRAM (RAD) .....</i>	<i>119</i>
<b>ATTACHMENT C: CAPITAL IMPROVEMENTS – CAPITAL FUND ANNUAL STATEMENT AND 5-YEAR ACTION PLAN AND P/E REPORT AND SCHEDULE.....</b>	<b>164</b>
<b>ATTACHMENT D: HOUSING NEEDS.....</b>	<b>165</b>
<b>ATTACHMENT E: ADDITIONAL INFORMATION .....</b>	<b>171</b>
<i>STATEMENT OF PROGRESS IN MEETING MISSION AND GOALS.....</i>	<i>171</i>
<i>SIGNIFICANT AMENDMENT AND SUBSTANTIAL DEVIATION OR MODIFICATION OF THE AGENCY PLAN.....</i>	<i>195</i>
<i>RESIDENT ADVISORY BOARD RECOMMENDATIONS.....</i>	<i>195</i>
<i>ELECTION PROCESS FOR RESIDENTS ON THE PHA BOARD.....</i>	<i>196</i>
<i>STATEMENT OF CONSISTENCY WITH THE CONSOLIDATED PLAN.....</i>	<i>196</i>
<i>SECOND REPLACEMENT HOUSING FACTOR (RHF) FUNDING GROUPS.....</i>	<i>197</i>
<b>ATTACHMENT F: ADMISSIONS POLICY FOR DECONCENTRATION.....</b>	<b>198</b>
<b>ATTACHMENT G: COMMUNITY SERVICE DESCRIPTION OF IMPLEMENTATION.....</b>	<b>204</b>
<b>ATTACHMENT H: PHA MANAGEMENT ORGANIZATION CHART .....</b>	<b>208</b>
<b>ATTACHMENT I: ASSESSMENT OF SITE-BASED WAITING LIST .....</b>	<b>209</b>
<b>ATTACHMENT J: SMOKE FREE HOUSING STATEMENT.....</b>	<b>210</b>
<b>ATTACHMENT K: PUBLIC HOUSING RESIDENT ADVISORY BOARD MEMBERS.....</b>	<b>214</b>
<b>ATTACHMENT L: AGENDAS OF MEETINGS HELD WITH NYCHA’S PUBLIC HOUSING RESIDENT ADVISORY BOARD .....</b>	<b>216</b>

**ATTACHMENT M: COMMENTS FROM RESIDENT ADVISORY BOARD MEMBERS .....222**  
**ATTACHMENT N: COMMENTS FROM THE PUBLIC ON THE FY19 ANNUAL PHA PLAN.....254**  
**ATTACHMENT O: PIH NOTICE 2016-17-RENTAL ASSISTANCE DEMONSTRATION (RAD)**  
**NOTICE REGARDING FAIR HOUSING AND CIVIL RIGHTS REQUIREMENTS AND**  
**RELOCATION REQUIREMENTS APPLICABLE TO RAD FIRST COMPONENT – PUBLIC**  
**HOUSING CONVERSION .....277**

## **Executive Summary**

### **NYCHA's Final Agency Plan for FY 2019**

Federal law requires the New York City Housing Authority (“NYCHA”) to develop, with input from public housing residents, Section 8 participants, elected officials and the public, a plan setting forth its major initiatives for the coming year.

The Final Agency Plan for FY 2019 is available for public review at NYCHA’s Central Office and each development’s management office as well as on NYCHA’s web page <http://www1.nyc.gov/site/nycha/about/annual-plan-financial-information.page>. NYCHA will also provide a copy of the Final Agency Plan to each public housing Resident Association President.

NYCHA held a public hearing at the Borough of Manhattan Community College (“BMCC”) in Manhattan on May 22, 2018 and accepted written comments on the Draft Agency Plan through May 23, 2018. Please see the Notice on page 10. NYCHA met with the Resident Advisory Board (“RAB”) members for their comments in 6 meetings between January and May 2018.

NYCHA’s Final Agency Plan was submitted to the U.S. Department of Housing and Urban Development (“HUD”) by October 18, 2018. Following NYCHA’s submission, HUD has 75 days in which to review and approve the plan.

NYCHA’s priorities for the coming year are outlined on pages 20 through 31.

### ***NextGeneration NYCHA***

On May 19, 2015, Mayor de Blasio and NYCHA announced NextGeneration NYCHA (“NextGen”), a comprehensive ten-year plan to stabilize the financial crisis facing New York City’s public housing authority and deliver long-needed improvements to residents’ quality of life by changing the way NYCHA is funded, operated and how it serves its residents. Developed over one year from 150 collaborative meetings with NYCHA residents, stakeholders and elected officials, NextGen builds on the de Blasio administration’s commitment to stabilize, preserve and revitalize public housing. Facing the worst financial crisis in NYCHA’s history, the Authority continues to launch targeted initiatives with the goal of improving resident quality of life and preserving public housing for this and future generations. With increased transparency, infrastructure improvements, and stakeholder engagement, NYCHA is taking meaningful steps to change the way it does business and become a more modern, effective and efficient landlord. NextGen’s 15 targeted strategies support four principal goals:

1. Change the way NYCHA is funded
2. Operate like a more modern, efficient landlord
3. (Re)build existing public housing and new affordable housing
4. Engage residents and connect them to best-in-class services

In the past three years, NYCHA has made major progress in its commitment to improving quality of life for the over 390,000 people who call NYCHA home. NYCHA modernized operations using technology and implemented flexible property management staff schedules to provide better customer service. We have generated revenue for repairs through ground-floor leasing to businesses and improved rent collection. We’ve placed more than 5,600 residents in jobs. All this despite the fact

that since 2001, NYCHA has lost \$2.7 billion in federal operating and capital funding, and decades of federal disinvestment have left our buildings needing \$17 billion worth of major repairs.

Below are some of the accomplishments achieved:

<b>FUND</b>
<b>Improve resident rent and fee collection.</b>
<ul style="list-style-type: none"> <li>• 4.7% increase in rent collection = \$47 million in new revenue</li> </ul>
<b>Maximize the revenue and uses of ground floor spaces.</b>
<ul style="list-style-type: none"> <li>• \$1.35 million in total new annual revenue, of which \$890K represents NexGen reactivations of 27 formerly vacant spaces from the start of NexGen in May 2015 through August 2018.</li> </ul>
<b>OPERATE</b>
<b>Transform into a digital organization</b>
<ul style="list-style-type: none"> <li>• 5.3 million in savings resulting from deployment of smart phones to property management staff</li> <li>• Over 3 million work orders closed using smart phones</li> <li>• \$2.7 million in savings from launch of MyNYCHA app</li> </ul>
<b>Improve Customer Service</b>
<ul style="list-style-type: none"> <li>• 11 developments continue to pilot the Flex Ops extended service hours program</li> <li>• Completed the roll out of online annual and interim recertifications for all developments and installed new kiosks in every management office to provide access to NYCHA’s online services</li> </ul>
<b>Pursue a comprehensive sustainability agenda</b>
<ul style="list-style-type: none"> <li>• \$272 million approved and in construction for four Energy Performance Contracts (EPC) serving 63,000 apartments</li> <li>• For the 2017-2018 program year, NYCHA has entered into Weatherization Assistance Program contracts for 990 apartments with a total construction value of \$4.7 million</li> <li>• For the 2018-2019 program year, NYCHA has entered into Weatherization Assistance Program contracts for 266 apartments with a total construction value of \$1.2 million. An additional 508 units are undergoing audits for the 2018-2019 program year.</li> <li>• 100% of NYCHA developments now recycle. NYCHA completed a waste characterization study of recycling and bulk waste, in preparation for the forthcoming NextGeneration NYCHA Waste Management Plan.</li> </ul>

- In 2017- 2018, trained approximately 500 Operations staff in practices that promote sustainable and healthy homes \$2.2 billion in contracts executed related to Sandy recovery, started 28 major Sandy Recovery projects, and facilitated over 365 NYCHA residents jobs on Sandy related contracts.

### **Increase safety and security at NYCHA developments**

- 6,201 new lights installed at 16 developments, creating safer communities (Mayor’s lighting initiatives)
- 722 new lights installed at 2 developments (Ravenswood and Throggs Neck)
- 542 lights installed under the Recovery and Resilience Program
- 993 exterior wall-mounted fixtures at 10 developments under the EPC program
- 3,202 new CCTV cameras and 353 upgraded cameras at 63 developments, enhancing resident safety and security
- An additional 860 cameras installed under the Recovery and Resilience Program

## **(RE) BUILD**

### **Devise Capital Planning Strategy**

- Mayor de Blasio has committed \$1.3 billion to fix more than 949 roofs which will benefit over 175,000 residents.
- 68 roofs have been replaced at 7 developments. Approximately 70 roof replacements at 6 developments are in various stages of construction and will be completed by the end of 2019. An additional 84 roof replacements at 7 developments will begin construction before the end of 2018.
- 45 roofs were installed under the Recovery and Resilience program.

### **Provide underutilized NYCHA-owned land to support the creation of affordable housing units**

- 2,939 units of 100 percent affordable housing in development, creating desperately needed affordable homes
- 1,516 projected units for NextGen Neighborhoods (50% affordable, 50% market rate)

### **Leverage HUD programs to preserve housing**

- 3,051 units in predevelopment under the first phase of PACT/RAD
- 2,398 units in stakeholder engagement under the second phase of PACT/RAD
- 722 units in predevelopment under the first phase of PACT/Unfunded Units
- 1,321 units in stakeholder engagement under second phase of PACT/Unfunded Units

## **ENGAGE**

### **Transition from direct service provision to a partnership-based model, and transform resident engagement**

- 20,975 residents connected to services through community partnerships
- 94% of NYCHA’s developments are represented by a Resident Association, which enables residents to work collectively and effectively to advocate for their development and neighborhood.
- 14 new Youth Councils ensure that young residents have a voice and can work with the Authority as partners to help solve their communities’ needs

**Attract philanthropic dollars for resident services through the creation of a non-profit 501(c)3**

- \$2.5 million in donations and pledges received to benefit residents of NYCHA and their communities
- Launched the Food Access and Affordability Pilot, a program designed to test the viability of a sustainable collective purchasing food model for NYCHA residents.
- Launched Access Solar, a collaborative initiative with NYCHA Sustainability to bring community solar to NYCHA and generate revenue for the authority.
- Inaugural City Flavors fundraiser to raise money to provide Food Business Pathways graduates with increased access to capital by establishing a grant fund.
- Food Business Pathways Kiosk program will launch in October 2018 to provide graduates of the program to sell their items.
- Launched Connected Communities initial engagement with NYCHA staff to introduce ideas for physical interventions of NYCHA campuses that increase connection to the surrounding neighborhood.

**Connect residents to quality workforce opportunities**

- 9,936 residents job placements to support economic mobility
- 1,002 residents graduated from NYCHA Resident Training Academy
- 213 residents graduated from the Food Business Pathways program, and 34 graduated from the Childcare Business Pathways program

NextGeneration is transforming how NYCHA is funded, operates, builds and rebuilds, and engages residents and connects them to opportunity.

***NYCHA’s New Reality***

While NYCHA’s financial condition for Fiscal Year 2018 seems to be positive, there is potential loss of funding in Fiscal Year 2019 based on a preliminary proposal by the Trump Administration.

Fiscal Year 2019 Budget Proposal “An American Budget”, which was published on February 2018, funding for housing programs are expected to have significant reductions to three funding streams which are vital to NYCHA: two cuts impacting the Authority’s day-to-day operations (public housing and Section 8 subsidies) and elimination of Capital Fund. Public Housing loss is estimated to be between \$330-466 million, Section 8 loss of nearly 10,000 vouchers, and the Capital Fund loss is expected to be \$346 million.

## ***Housing New York, One City: Built to Last, and OneNYC***

### ***Housing New York 2.0***

Since Mayor de Blasio launched the Housing New York Plan in 2014, New York City has accelerated the construction and preservation of affordable housing to levels not seen in 30 years.

The City is on track to secure more affordable housing in the first four years of the Administration than in any comparable period since 1978. The City has tripled the share of affordable housing for households earning less than \$25,000. Funding for housing construction and preservation has doubled, as have the number of homes in the City's affordable housing lotteries each year. Hundreds of once-vacant lots have affordable homes rising on them today. Reforms to zoning and tax programs are not just incentivizing but mandating affordable apartments—paid for by the private sector—in new development.

### ***NextGeneration NYCHA – 100% Affordable Housing and Seniors First***

The Authority provides underutilized land for the creation of 10,000 affordable housing units, including a mix of commercial and community uses to provide additional amenities to residents and the surrounding community. The plan to create 100 percent affordable senior and multifamily housing on available NYCHA property was developed in response to resident and advocate calls for more affordable housing options in their communities.

Since the release of the NextGeneration NYCHA plan, NYCHA and New York City Department of Housing Preservation and Development (HPD) have announced plans for 100% Affordable Housing and Seniors First developments at twelve sites which will result in approximately eighteen hundred new units of senior and multifamily housing. In the summer of 2017 construction began on the first two of these projects at Ingersoll Houses in the Fort Greene neighborhood of Brooklyn and at Mill Brook Houses in the Mott Haven neighborhood in the Bronx.

All NextGeneration NYCHA 100% Affordable Housing and Seniors First developments will advance the goals of Mayor de Blasio's [Housing New York](#) plan and helps achieve NYCHA's commitment to contribute 10,000 of those affordable units within the decade as part of [NextGeneration NYCHA](#), the Authority's 10-year strategic plan.

### ***NextGeneration NYCHA – NextGeneration Neighborhoods (50/50)***

Centered on resident and community stakeholder engagement, the NextGen Neighborhoods program enables NYCHA to generate revenue to reinvest back into our development sites and across NYCHA by leveraging a 50-50 split of market-rate and affordable housing units.

In 2017, NYCHA and HPD announced selection of a development team at Holmes Towers in Manhattan and in 2018 at Wyckoff Gardens in Brooklyn. Prior to selection, between September 2015 and May 2016, over 1,300 residents participated in meetings, visioning sessions, and charrettes at both developments. All proposals received in response to the Request for Proposals were reviewed by a NYCHA resident members of the Stakeholder Committees prior to selection. NYCHA will continue to engage its residents through the Stakeholder Committees throughout development and construction. The Stakeholder Committees are also working directly with the selected developer by representing the interests and concerns of NYCHA residents, neighbors, and the community. Construction is expected to begin at Holmes Towers in 2019 and at Wyckoff Gardens in 2019 or 2020. NYCHA expects to receive approximately \$62 million collectively for the long-term leasing of these two development sites.



Two additional NextGen Neighborhoods sites were announced in 2017, at La Guardia Houses in Manhattan and at Cooper Park in Brooklyn. A RFP for La Guardia Houses was released in March 2018 and release of a RFP for Cooper Park is anticipated in Spring 2019. Resident engagement began for both sites in 2017.

### ***NextGeneration NYCHA – Permanent Affordability Commitment Together (PACT)***

NYCHA will use every tool available to protect the affordability of New York City’s housing stock and strengthen public housing for this and future generations of New Yorkers. NYCHA’s preservation work – called Permanent Affordability Commitment Together (PACT) – centers on converting public housing units to Section 8 with tenants-in-place via federal pathways such as the United States Department of Housing and Urban Development’s (HUD) Rental Assistance Demonstration (RAD) and adjacent programs. PACT is NYCHA’s initiative to facilitate major improvements to developments while preserving long-term affordability and maintaining strong resident rights through effective public-private partnerships. By leveraging these federal programs and tools, NYCHA will help improve the quality of life for residents, ensuring their apartments and buildings receive much-needed repairs and upgrades while preserving affordability and tenant protections. PACT is a component of NextGeneration NYCHA’s 10-year strategic plan to preserve public housing and become a more effective and efficient landlord. Under PACT, NYCHA seeks to shift a public housing development’s funding source to Project-Based Section 8 to provide a more stable flow of federal subsidy and to allow NYCHA and its development partners to raise external financing to address the development’s capital repair needs.

As the subsidy for a PACT development transitions from either unfunded status or public housing (Section 9) to the Housing Choice Voucher program (Section 8), NYCHA retains ownership and continues to play a key role in decision making and oversight of the development, specifically as the beneficial owner and Section 8 contract administrator. Under PACT rules, all units in the converted development must remain permanently affordable (rent cannot exceed 30% of resident income), which NYCHA will enforce through continued ownership of the land and legal agreements with the development partner. Residents will continue to have the same succession opportunities and grievance procedures under PACT that currently exist for NYCHA’s public housing tenants. Residents will retain the right to establish and operate a resident organization and receive funding for that group. Finally, development partners will be required to train and hire NYCHA residents, and proactively engage residents on a regular basis as the project moves forward.

### **PACT/RAD**

#### **RAD at Ocean Bay (Bayside)**

In December 2016, NYCHA closed its first PACT/RAD transaction at Ocean Bay (Bayside) in the Rockaways neighborhood of Queens, converting 1,395 apartments in 24 elevator buildings from public housing to Section 8 Project-Based Vouchers (PBV). NYCHA entered into a public-private partnership with MDG Construction + Design (developer), The Wavecrest Management Team (property manager), Catholic Charities of Brooklyn and Queens (social services provider), and Ocean Bay Community Development Corporation (resident outreach and engagement entity). The project is being financed with Superstorm Sandy recovery funds from the Federal Emergency Management Agency (FEMA), along with New York State Housing Finance Agency tax-exempt bonds and equity generated from federal 4% Low Income Housing Tax Credits. The project’s total development cost is \$560 million and overall investment in the project is projected at \$325 million; funds are being directed to extensive capital improvements, including the installation of upgraded heating and security systems, new boilers and roofs, and updated apartment interiors that include new windows, kitchens,

and bathrooms. All rehab work is occurring with tenants-in-place; no residents are being relocated or displaced because of the project. RAD repairs will be completed in 2018 and the remaining FEMA work will conclude in June 2019.

### **RAD at Scattered Sites in the Bronx and Brooklyn**

In January 2017, NYCHA received HUD approval to convert approximately 1,700 units in the Bronx and Brooklyn from public housing to Section 8 Project-Based Vouchers (PBVs). In May 2017, NYCHA issued a Request for Proposals (RFP) to identify development partners to facilitate the conversion of funding, raise financing, perform the required capital rehabilitation, undertake property management, and deliver social services at the 17 affected scattered site developments, which are broken up into three bundles as follows:

1. Bundle 1 (the Bronx): Twin Parks West (Sites 1 & 2); Franklin Avenue I Conventional; Franklin Avenue II Conventional; Franklin Avenue III Conventional; Highbridge Rehabs (Anderson Avenue); Highbridge Rehabs (Nelson Avenue)
2. Bundle 2 (the Bronx): Betances II, 9A; Betances II, 13; Betances II, 18; Betances III, 9A; Betances III, 13; Betances III, 18; Betances V (partial); Betances VI (partial)
3. Bundle 3 (Brooklyn): Bushwick II (Groups A & C); Bushwick II CDA (Group E); Palmetto Gardens

In January 2018, NYCHA selected development partners for all three bundles. Construction is expected to begin at the developments in Bundles 1 and 2 in 2018 and at the developments in Bundle 3 in 2019. The Significant Amendment to the FY 2018 Annual Plan included the proposal to add additional units from nearby developments to Bundles 1 and 2 as follows: Betances I, Betances IV, and the remainder of Betances V and VI to Bundle 2, and Bushwick II (Groups B & D) and Hope Gardens to Bundle 3.

### **PACT/Unfunded Units (LLC II)**

In July 2017, NYCHA announced that it is expanding PACT to protect the Authority's unfunded unit portfolio. This portfolio consists of eight (8) conventional public housing developments, also known as the "LLC II developments," which are listed in the table on the next page and currently receive no dedicated public housing funding. Previously, NYCHA's PACT program was synonymous with RAD. To make significant repairs, more effectively manage the developments, and strategically deploy NYCHA's limited financial resources, NYCHA is expanding PACT to create additional public-private partnerships and actively bring the unfunded units into the Authority's Housing Choice Voucher (Section 8) program.

The LLC II developments were originally built and funded by New York City and New York State subsidies but were never funded directly by HUD. These developments currently "share" in the federal funds provided for NYCHA's public housing. This costs NYCHA more than \$23 million a year. Additionally, the eight developments require more than \$1 billion in capital repairs, but while they remain unfunded, the buildings continue to deteriorate.

On September 11, 2008, HUD approved NYCHA's plan to transition the unfunded public housing units to Section 8 assistance. Currently, when a resident vacates their apartment in an LLC II development, the Authority converts the unit to Section 8. Through this process, 1,804 units in the eight developments became part of Section 8 between 2008 and 2018. Through PACT, the remaining 3,890 unfunded units will convert to Section 8. This PACT strategy is an unprecedented financing

model to support these apartments, prevent them from falling into complete disrepair, and protect their affordability and residents' rights.

Shifting the units to the Section 8 Housing Choice Voucher program will bring new, stable revenue to the developments and allow for substantial improvements to be made to the apartments, buildings, and grounds. Additionally, funding previously diverted to these developments from the rest of NYCHA's portfolio will now go towards the operation and maintenance of NYCHA's traditional public housing developments.

Under PACT, community engagement and resident conversion began at Baychester and Murphy Houses in the Bronx in August 2017. In September 2017, NYCHA released a Request for Proposals (RFP) to identify development partners to raise financing, perform capital rehabilitation, undertake property management, and, where appropriate, deliver social services at the eight affected developments, starting with the Bronx sites.

On December 3, 2017, HUD approved NYCHA for a retention action pursuant to 2 CFR Part 200 for Baychester and Murphy. HUD had previously approved NYCHA's Significant Amendment to the FY 2017 Annual Plan for the retention action at Baychester and Murphy on November 22, 2017.

As of September 2018, 91% of residents at Baychester and 94% of residents at Murphy have been converted to Section 8 for an overall conversion rate of 92%. In 2018, NYCHA designated the following development partner for this PACT project: MBD Community Housing Corporation, Camber Property Group, LLC, and L&M Development Partners, Inc. Construction is expected to begin in 2019.

NYCHA plans to pursue similar HUD approvals for the remaining six developments in the LLC II portfolio. Through this action, all units in the developments will be operated outside of the federal public housing program and families will be transitioned to Section 8 assistance. Families will be transitioned to Section 8 assistance. Families ineligible for Section 8 assistance will be allowed to remain in place and pay no more than 30% of their income for rent. Completion of the full PACT conversion is expected by 2026.

As part of the Amendment to the FY 2018 Annual Plan, NYCHA requested HUD approval for a retention action pursuant to 2 CFR Part 200 for Independence and Williams Plaza in Brooklyn. NYCHA began community engagement and resident conversion activities at these developments in March 2018.

### ***One City: Built to Last***

NextGeneration NYCHA is also informed by the Mayor's sweeping energy efficiency and reduction emission plan for City buildings, **One City: Built to Last**. This plan, released in September 2014, commits to an 80% reduction in the City's greenhouse gas emissions by 2050. NextGeneration NYCHA provides strategies for NYCHA to become more sustainable and resilient, to prepare for a changing climate, and to mitigate greenhouse gas emissions.

### ***The NextGeneration NYCHA Sustainability Agenda***

In April 2016, New York City Housing Authority (NYCHA) released its Sustainability Agenda, a ten-year roadmap for creating healthy and comfortable housing that will withstand the challenge of climate change. The Sustainability Agenda is a central strategy of NextGeneration NYCHA, the Authority's long-term strategic plan to become a more efficient and effective landlord, in order to

improve the quality of life for NYCHA residents. It is also an invitation to residents and surrounding communities to work with NYCHA to realize a shared long-term vision of equity, sustainability, and resiliency. <http://www1.nyc.gov/site/nycha/about/sustainability.page>

The Sustainability Agenda includes 17 targeted strategies, which are meaningful ways NYCHA plans to meet the de Blasio administration’s emission-reduction goals (One City: Built to Last) and resiliency and sustainability objectives (OneNYC.) The plan also outlines NYCHA’s commitment to federal sustainability goals, including a pledge to develop 25 MW of renewable energy capacity by 2025 as part of Renew300, a joint HUD-DOE initiative. NYCHA has also committed to participate in HUD’s Better Buildings Challenge to cut energy intensity in the Authority’s buildings portfolio-wide by 20% over the next decade.

Here are some highlights of our accomplishments since launch of the Sustainability Agenda:

<b>Goal 1: Achieve short-term financial stability and diversify funding for the long term</b>	
Strategy S1: Attract investments for capital improvements	<p>NYCHA is well on the way toward its goal of obtaining \$300 million via HUD Energy Performance Contracts (EPCs). Four EPCs totaling \$272 million has been approved by HUD and are now under construction.</p> <p>NYS Weatherization Assistance Program (WAP): For the 2017-2018 WAP program year, NYCHA has entered into contracts for 990 NYCHA units with a total construction value of \$4.7 million. To date for the 2018-2019 program year, NYCHA has entered into Weatherization Assistance Program contracts for 266 apartments with a total construction value of \$1.2 million.</p>
Strategy S2: Raise revenues through clean and distributed energy projects	<p>NYCHA released an RFP in October of 2017 to invite solar developers to propose photovoltaic installations on NYCHA property in exchange for lease payments. This RFP is the first of an anticipated series to meet the Renew300 commitment of 25 MW over 10 years.</p> <p>In concert with the commercial-scale solar program, in April 2018 NYCHA launched ACCESSolar, a program tailored to small businesses and non-profits.</p>
<b>Goal 2: Operate as an effective and efficient landlord</b>	
Strategy S3: Create healthy indoor environments	<p><b>Implement a Comprehensive Mold Response Initiative:</b> In April 2018, NYCHA agreed to a full rollout of the Mold Busters program authority-wide to train NYCHA staff to find the root causes of mold and eliminate them.</p> <p><b>Reduce exposure to secondhand smoke at home:</b> NYCHA launched an initiative to educate residents about the health risks of exposure to secondhand smoke and has expanded access to services for smokers who want to quit. In July 2018, NYCHA’s Smoke-Free policy took effect to meet the HUD mandate.</p> <p><b>Train property managers in practices that promote healthy homes:</b> In the winter of 2018, NYCHA trained approximately 500 Operations staff in practices that promote sustainable and healthy homes. The training includes curriculum around vacancy turn-over, energy efficiency,</p>

	mold, smoke-free housing policy, integrated pest management and waste management. The program is a joint effort CUNY, DOHMH, and DSNY.
Strategy S4: Efficiently provide comfortable and reliable heat and hot water	<p><b>Improve heating and hot water systems through smart building technology:</b> In summer of 2017 CUNY’s Building Performance Lab submitted a report recommending upgrades of NYCHA’s heating controls. Meanwhile, NYCHA has continued to expand the use of indoor temperature sensors. About 4 percent of buildings that can benefit from the technology currently have the sensors; 28 percent are expected to have them by 2019.</p> <p><b>Thoroughly test and tune all building systems regularly:</b> NYC DOB has approved NYCHA’s alternative compliance plan for Local Law 87 retro-commissioning that would enable all buildings covered by the law to file by 2020. NYCHA is also working to include retro-commissioning in regular inspections.</p> <p><b>Enhance training and professional development for Heating Management staff:</b> CUNY’s Building Performance Lab made recommendations for a training program for Heating Management staff that would provide a multi-year professional development path.</p>
Strategy S5: Improve water management	<p><b>Install water meters in all developments:</b> DEP is more than 75% through the installation of 540 meters at 500 NYCHA buildings. All NYCHA buildings will have meters in place by 2019.</p> <p><b>Understand the patterns of water consumption:</b> NYCHA and DEP are partnering on a NYSERDA-funded water consumption study. DEP began submeter installations in early 2018.</p> <p><b>Replace outdated fixtures and update purchasing standards:</b> NYCHA updated its purchasing standards for toilets (1.28 gallons per flush), showerheads (1.5 gallons per minute), and bathroom faucets (1 gallon per minute) in 2016. NYCHA has been testing ultra-high efficiency toilets (0.8 gallons per flush vs. 1.6 gallons per flush for standard toilets) in 177 apartments since 2016. NYCHA is also replacing old toilets as part of DEP’s <a href="#">Toilet Replacement Program</a>.</p>
Strategy S6: Adopt a comprehensive waste management plan	<p><b>Expand recycling infrastructure:</b> In January 2018, NYCHA began enrolling developments in the DSNY e-cycleNYC program, which diverts electronic waste from landfills. As of April 2018, nine developments are participating.</p> <p><b>Waste Management Plan:</b> NYCHA convened an inter-agency advisory group to oversee the development of a comprehensive waste management plan and completed a waste characterization study of recycling and bulk waste. The comprehensive waste management plan will be released in 2018.</p>
<b>Goal 3: Rebuild, expand, and preserve public and affordable housing</b>	
Strategy S7: Adopt sustainability standards	In April 2016, NYCHA adopted the New York City Overlay to the Enterprise Green Communities Criteria as the green standard for new construction. The Criteria provided the foundation for the Design

	Guidelines for Rehabilitation of NYCHA Residential Buildings released December 2016.
Strategy S8: Eliminate roof, façade, and plumbing leaks	In January 2017, Mayor de Blasio announced that the City will invest \$1 Billion to replace roofs at more than 700 NYCHA buildings. To date, 68 buildings at 7 developments have received new roofs under this commitment. Construction will begin on 15 more developments in 2018.
Strategy S9: Retrofit master-planned developments	NYCHA has \$272 million in energy efficiency construction underway at 72 developments throughout the city, serving 63,000 apartments.
Strategy S10: Retrofit scattered-site developments	In May 2017, NY State Weatherization Assistance Program (WAP) completed energy efficiency upgrades at Howard Avenue Houses, the pilot development for the NYCHA WAP initiative. In the 2017-2018 program year NYCHA entered into contracts for 990 units with a total construction value of \$4.7 million. To date for the 2018-2019 program year, NYCHA has entered into Weatherization Assistance Program contracts for 266 apartments with a total construction value of \$1.2 million. An additional 508 units are undergoing audits for the 2018-2019 program year.
Strategy S11: Build green infrastructure	The green infrastructure (GI) installation at Edenwald Houses was completed in summer of 2018, adding it to the list of 4 developments where GI is installed. Design is underway or completed for GI at 32 NYCHA developments, with construction expected to begin in late 2018 through mid-2019. In late 2017, an additional 31 sites have been identified for future GI installations.
Strategy S12: Incorporate climate change resiliency into capital planning	Enterprise Community Partners, Inc. assessed the resilience of 12 NYCHA buildings and delivered its recommendations in November 2017.
<b>Goal 4: Engage residents and connect them to best-in-class services</b>	
Strategy S13: Support resident- and community-led sustainability	<p><b>Promote healthy food access through resident-led urban agriculture:</b> Farms at NYCHA was launched in 2016 and built five new farms to expand healthy food access, provide youth workforce and leadership development, and promote sustainable and connected public housing communities. Since their inception, the farms have distributed over 32,000 pounds of fresh produce, diverted 8,600 pounds of food scraps from landfills and incinerators through composting, engaged NYCHA residents in 800 volunteer shifts, and provided young NYCHA adults with training and leadership development. The sixth was completed in summer of 2018.</p> <p><b>Support resident-driven sustainability projects:</b> In September 2017, NYCHA launched the Ideas Marketplace in partnership with the Fund for Public Housing (FPH) and ioby, a non-profit crowdfunding platform. The Ideas Marketplace helps residents and community-based organizations showcase and fund projects in their homes. Since the launch of the partnership, 5 projects raised over \$60,000.</p>
Strategy S14: Connect residents to green jobs	Since April 2017, NYCHA has employed 101 residents to work on energy efficiency projects.

	<p>In January 2018, NYC DEP committed to prioritizing NYCHA residents when hiring for its 75 new bioswale right-of-way maintenance jobs.</p> <p>NYCHA is also requiring resident hiring and training plans as part of its 25 MW solar program.</p>
<b>Working towards 80 x 50</b>	
Strategy S15: Create an 80 x 50 roadmap	<p>Steven Winter Associates conducted a study of technologies needed to achieve 2030 and 2050 climate goals. NYCHA will begin to adopt these recommendations in the upcoming heating system upgrades.</p> <p>In the summer of 2018, NYCHA hired Environmental Defense Fund (EDF) fellows to develop a fleet study with recommendations toward the adoption of electric vehicles and support NYC’s Clean Fleet goal of cutting municipal vehicle emissions in half by 2025. The study is complete and will be published in the Fall of 2018.</p>
Strategy S16: Create incentives to encourage new low-energy buildings	<p>In spring of 2017, Enterprise Community Partners provided an introduction to Passive House specifications to developers who have qualified to submit development proposals to NYCHA.</p>
Strategy S17: Test “deep” energy retrofit technologies	<p>NYCHA has five technology pilots underway. Two pilots were selected through Calls for Innovations with the support of the Mayor’s Office of Chief Technology Officer (MOCTO), and three pilots were selected through the Fund for Public Housing’s the <u>Tech Pilots</u> program.</p>

***OneNYC***

Lastly, NextGeneration NYCHA is a part of **OneNYC**, the Mayor’s plan for growth, sustainability, resiliency, and equity released in April 2015. NextGeneration NYCHA plays an important role in ensuring the vision of a thriving, just, equitable, sustainable and resilient city. Through multiple initiatives, including capital improvements, affordable housing, sustainability efforts, and recycling, NYCHA continues to play a key role in the success of **OneNYC**.

**ATTACHMENT A**  
**PHA PLAN UPDATE**

**A) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:**

<ul style="list-style-type: none"> <li>• Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures</li> <li>• Financial Resources</li> <li>• Operation and Management</li> <li>• Community Service and Self-Sufficiency</li> <li>• Hope VI, Mixed Finance Modernization or Development, Demolition and Disposition, Conversion of Public Housing, Homeownership, and Project Based Vouchers</li> </ul>	<ul style="list-style-type: none"> <li>• Housing Needs</li> <li>• Statement of Progress in Meeting Mission and Goals – FY 2015 to FY 2019</li> <li>• Admissions Policy for Deconcentration</li> <li>• Resident Advisory Board Members</li> <li>• PHA Management Organizational Chart</li> <li>• Agendas of Meetings Held with NYCHA’s Resident Advisory Board</li> </ul>
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**B) Identify the specific locations where the public may obtain copies of the 5-Year and Annual PHA Plan.**

The *Final Annual Plan for FY 2019* is available for public inspection at NYCHA’s principal office, located at 250 Broadway, New York, NY between the hours of 9:30 a.m. to 4:30 p.m. *The Final Agency Annual Plan for FY 2019* is also available at the following locations:

- On NYCHA’s webpage, which is located at: <http://www1.nyc.gov/site/nycha/about/annual-plan-financial-information.page>.
- At the Management Office of *each* NYCHA public housing development during regular business hours.

Manhattan Family Partnerships Borough Office 45 Allen Street New York, New York  Taft Senior Center 1365 5th Avenue New York, New York  Sedgwick Senior Center 1553 University Avenue Bronx, New York	Soundview Senior Center 1674 Seward Avenue Bronx, New York  Queens Community Development / Family Partnerships Borough Office 70-30 Parsons Boulevard Flushing,, New York	Staten Island Family Partnerships Borough Office 90 Lafayette Avenue Staten Island, New York  Brownsville Senior Center 528 Mother Gaston Boulevard Brooklyn, New York
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## C) PHA Plan Elements (24 CFR 903.7)

### 1. Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures

#### A. Public Housing

##### (1) Eligibility

a. When does the PHA verify eligibility for admission to public housing? (select all that apply)

- When families are within a certain number of being offered a unit: (state number)  
 When families are within a certain time of being offered a unit: (state time)

*Preliminarily, within six to nine months before being offered a unit, and finally, when the family reaches the top of the waiting list.*

Other: (describe)

b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?

- Criminal or Drug-related activity  
 Rental history  
 Housekeeping  
 Other (describe)

*NYCHA takes appropriate action before admission to verify each family's actual composition and to verify the citizenship/immigration status of each household member as required under Federal law.*

c.  Yes  No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

d.  Yes  No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?

e.  Yes  No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

*NYCHA performs criminal background checks by examining the public conviction records of The New York State Office of Court Administration and the Dru Sjodin National Sex Offender Website.*

##### (2) Waiting List Organization

a. Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)

- Community-wide list  
 Sub-jurisdictional lists (*By NYC Borough*)  
 Site-based waiting lists *See Attachment I*

Other (describe)

b. Where may interested persons apply for admission to public housing?

- PHA main administrative office  
 PHA development site management office  
 Other (list below)

*NYCHA maintains two Walk-in Customer Contact Centers serving the five boroughs of New York City. Applicants may also apply online at NYCHA's website.*  
<http://www1.nyc.gov/site/nycha/about/contact.page>

c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection (3) Assignment

1. How many site-based waiting lists will the PHA operate in the coming year? **1**

2.  Yes  No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site-based waiting list plan)?  
If yes, how many lists?

3.  Yes  No: May families be on more than one list simultaneously?  
If yes, how many lists?

4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?

- PHA main administrative office  
 All PHA development management offices  
 Management offices at developments with site-based waiting lists  
 At the development to which they would like to apply  
 Other (list below)

*NYCHA maintains two walk-in Customer Contact Centers serving the five boroughs of New York City.*

d. Additional Information

*NYCHA assists the management companies of the following developments with their waiting lists for the public housing units located in their developments. This assistance may include sending the management companies lists of public housing applicants that may qualify for their developments or by sending canvas letters to applicants on NYCHA's public housing waiting list to advise them of the opportunity to submit an application for these properties.*

Please note that NYCHA does not own or manage the developments below and does not maintain the waiting lists for these developments itself.

- 1070 Washington Avenue (La Preciosa) (NY005024000)
- Prospect Plaza Phase I (NY005025000)
- Prospect Plaza Phase II (NY005025001)

- PSS Grandparent Family Apartments (NY005005600)
- Randolph South (NY005026000)

**(3) Assignment**

a. How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (Select one)

- One
- Two
- Three or More

b.  Yes  No: Is this policy consistent across all waiting list types?

c. If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA:

*Applicants and transferees with borough choice and applicants and transfers for accessible apartments are given two apartment offers before they are removed from the waiting list.*

**(4) Admissions Preferences**

a. Income targeting:

Yes  No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 40 percent of all new admissions to public housing to families at or below 30 percent of median area income?

*While NYCHA does not plan to exceed the federal targeting requirements, slightly over 72% of the families admitted to public housing during calendar year 2017 have been households with incomes at or below 30% of area median income.*

b. Transfer policies:

In what circumstances will transfers take precedence over new admissions? (list below)

- Emergencies (*fire related or uninhabitable only*)
- Overhoused
- Underhoused
- Medical justification
- Administrative reasons determined by the PHA (e.g., to permit modernization work)
- Resident choice: (state circumstances below)
- Other: (list below)

*Tenant transfers for reasonable accommodation.*

*Families displaced for development renovation.*

*Families displaced for development renovation and wishing to return to the development after renovation is completed.*

*Accessible Apartments.*

*Under occupied families required to move to smaller apartment as a result of Termination of Tenancy proceeding.*

*Currently, three out of five vacant apartments are offered to transfers and the other two apartments to new admissions. However, within equal priority transfers, residents residing within the same development as the apartment vacancy shall have preference over residents who reside at a different development.*

Preferences

1.  Yes  No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If “no” is selected, skip to subsection (5) Occupancy)
  
2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

- Working families and those unable to work because of age or disability
- Veterans and veterans’ families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

*Intimidated Witnesses.*

*Legally doubled up and overcrowded in apartment subsidized by NYCHA (either public housing or Section 8)*

*Doubled up or overcrowded in apartment not subsidized by NYCHA.*

*Families headed by persons with acute immunological disorders of a degenerative nature or other disabilities or medical conditions requiring a high level of physical and supportive service accommodations, including NYCHA residents and homeless persons (Stanton Street).*

*Referrals from the New York City Department of Homeless Services.*

*Referrals from the New York City HIV/AIDS Services Administration, the Administration for Children's Services, the New York City Department of Housing Preservation and Development, or the New York City Health and Hospitals Corporation.*

*For single-person families: Elderly persons and persons with disabilities will be given preference over other applicants, except for emergency applicants, who will be taken in order of priority regardless of age or disability.*

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

Former Federal preferences:

- 1, 3 Homelessness
- 1, 3 Involuntary Displacement (Disaster, Government Action, Inaccessibility, Property Disposition)
- 2 Victims of Domestic Violence
- 3 Action of Housing Owner
- 3 Substandard Housing
- 3 High Rent Burden

Other preferences (select all that apply)

*Working family priorities are assigned by income tier with the first number representing Tier III (households with incomes between 51% and 80% AMI), followed by Tier II (households with incomes between 31% and 50% AMI), and then Tier I (households with incomes less than 30% AMI).*

- 1,2,3 Working families and those unable to work because of age or disability referred by the NYC Department of Homeless Services
- 1,2,3 Working families and those unable to work because of age or disability
- Veterans and veterans' families
- 1,2,3 Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- 1,2,3 Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- 3 Victims of reprisals or hate crimes
- Other preference(s) (list below)

*1 – Referrals from the New York City Department of Homeless Services.*

*1- Referrals from the New York City HIV/AIDS Services Administration, the Administration for Children's Services, the New York City Department of Housing Preservation and Development or the New York City Health and Hospitals Corporation.*

*2 - Intimidated witnesses.*

3 – Legally doubled up and overcrowded in apartment subsidized by NYCHA (either public housing or Section 8).

3 – Doubled up in apartment not subsidized by NYCHA.

3 – Overcrowded in apartment not subsidized by NYCHA.

3 – For single-person families: Elderly persons and persons with disabilities will be given preference over other applicants, except for emergency applicants, who will be taken in order of priority regardless of age or disability

3 - Families headed by persons with acute immunological disorders of a degenerative nature or other disabilities or medical conditions requiring a high level of physical and supportive service accommodations, including NYCHA residents and homeless persons, who are referred by designated public and private social service agencies (Stanton Street).

4 - Families headed by persons with acute immunological disorders of a degenerative nature or other disabilities or medical conditions requiring a high level of physical and supportive service accommodations, including NYCHA residents and homeless persons (Stanton Street).

Admission income limits apply at certain developments, as follows: At tax credit developments family income must not exceed 60% of area median income. At all other developments, family income must not exceed 80% of area median income.

4. Relationship of preferences to income targeting requirements:

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

**(5) Occupancy**

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)

- The PHA-resident lease
- The PHA's Admissions and (Continued) Occupancy policy
- PHA briefing seminars or written materials
- Other source (list)

b. How often must residents notify the PHA of changes in family composition? (select all that apply)

- At an annual reexamination and lease renewal
- Any time family composition changes
- At family request for revision
- Other (list)

**(6) Deconcentration and Income Mixing**

a.  Yes  No: Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

b.  Yes  No: Did the PHA adopt any changes to its **admissions policies** based on the results of the required analysis of the need to promote deconcentration of poverty or to assure income mixing?

c. If the answer to b was yes, what changes were adopted? (select all that apply)

Adoption of site-based waiting lists  
If selected, list targeted developments below:

Employing waiting list "skipping" to achieve deconcentration of poverty or income mixing goals at targeted developments  
If selected, list targeted developments below:

*All lower income developments.*

Employing new admission preferences at targeted developments  
If selected, list targeted developments below:

Other (list policies and developments targeted below)

d.  Yes  No: Did the PHA adopt any changes to **other** policies based on the results of the required analysis of the need for deconcentration of poverty and income mixing?

e. If the answer to d was yes, how would you describe these changes? (select all that apply)

- Additional affirmative marketing
- Actions to improve the marketability of certain developments
- Adoption or adjustment of ceiling rents for certain developments
- Adoption of rent incentives to encourage deconcentration of poverty and income-mixing
- Other (list below)

f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)

- Not applicable: results of analysis did not indicate a need for such efforts
- List (any applicable) developments below:

*All lower income developments.*

g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)

- Not applicable: results of analysis did not indicate a need for such efforts
- List (any applicable) developments below:

## **7) Resident Police Officers (RPO)**

Pursuant to a Memorandum of Understanding between NYCHA and the New York City Police Department (NYPD), the Authority provides apartments to Police Officers and their families at rents comparable to NYCHA resident employee rents. The presence of a Police Officer who resides in a NYCHA development enhances security, fosters a greater understanding between NYCHA residents and the Police, and provides role models for the youth residing in that development. A Resident Police Officer (RPO) is required to perform a minimum of eight hours of Community Service per month. This Community Service may not include police work, law enforcement, Tenant Patrol or other security-related work.

NYCHA currently has 13 RPOs living in the following NYCHA developments: Amsterdam, Bushwick II CDA (Group E), Clinton, Glenwood, Gowanus, Latimer Gardens, Mitchel, Mott Haven, Throggs Neck, Two Bridges, Vladeck, Wagner, and Wise Towers.

## **B. Section 8**

### **(1) Eligibility**

a. What is the extent of screening conducted by the PHA? (select all that apply)

- Criminal or drug-related activity only to the extent required by law or regulation
- Criminal and drug-related activity, more extensively than required by law or regulation
- More general screening than criminal and drug-related activity (list factors below)
- Other (list below)

b.  Yes  No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

c.  Yes  No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?

d.  Yes  No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

*NYCHA performs criminal background checks by examining the public conviction records of the New York State Office of Court Administration and the Dru Sjodin National Sex Offender Public Website*

e. Indicate what kinds of information you share with prospective landlords? (select all that apply)

- Criminal or drug-related activity
- Other (describe below)

*If requested, NYCHA will provide the property owner with the voucher holder's last address.*

### **(2) Waiting List Organization**

a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)

- None
- Federal public housing
- Federal moderate rehabilitation
- Federal project-based certificate program



Other federal or local program (list below)

b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)

- PHA main administrative office  
 Other (list below)

*NYCHA's waitlist is currently closed. However, if the waitlist were to reopen, persons interested in applying may do so online.*

### **(3) Search Time**

a.  Yes  No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below:

*NYCHA's initial voucher term is 120 days, which exceeds HUD's standard 60-day period. Voucher holders may request an extension to this term.*

### **(4) Admissions Preferences**

a. Income targeting

Yes  No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75 percent of all new admissions to the section 8 program to families at or below 30 percent of median area income?

b. Preferences

1.  Yes  No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent (5) Special purpose Section 8 assistance programs)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)  
 Victims of domestic violence  
 Substandard Housing  
 Homelessness  
 High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability  
 Veterans and veterans' families  
 Residents who live and/or work in your jurisdiction  
 Those enrolled currently in educational, training, or upward mobility programs  
 Households that contribute to meeting income goals (broad range of incomes)  
 Households that contribute to meeting income requirements (targeting)  
 Those previously enrolled in educational, training, or upward mobility programs

- Victims of reprisals or hate crimes  
 Other preference(s) (list below)

Preferences	Description
1	Homeless Referrals from NYC agencies
2	Victim of Domestic Violence Intimidated Witness referred by prosecutorial or law enforcement agency
3	NYCHA residents required to move because their unit is not habitable, they are at risk of displacement, or they are extremely under occupied in their current apartment
4	Mobility Impaired and Residing in Inaccessible Housing
5	Elderly persons and persons with disabilities
6	All other applicants

3. If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

Former Federal preferences

- 1 Homelessness  
 2 Victims of Domestic Violence  
 Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)  
 Substandard Housing  
 High Rent Burden

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability  
 Veterans and veterans’ families  
 Residents who live and/or work in your jurisdiction  
 Those enrolled currently in educational, training, or upward mobility programs  
 Households that contribute to meeting income goals (broad range of incomes)  
 Households that contribute to meeting income requirements (targeting)  
 Those previously enrolled in educational, training, or upward mobility programs  
 Victims of reprisals or hate crimes  
 Other preference(s) (list below)

Preferences	Description
1	Homeless Referrals from NYC agencies
2	Victim of Domestic Violence Intimidated Witness referred by prosecutorial or law enforcement agency
3	NYCHA residents required to move because their unit is not habitable, they are at risk of displacement, or they are extremely under occupied in their current apartment
4	Mobility Impaired and Residing in Inaccessible Housing
5	Elderly persons and persons with disabilities
6	All other applicants

4. Among applicants on the waiting list with equal preference status, how are applicants selected?  
(select one)

- Date and time of application
- Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for “residents who live and/or work in the jurisdiction”  
(select one)

- This preference has previously been reviewed and approved by HUD
- The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

**(5) Special Purpose Section 8 Assistance Programs**

In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained?

(select all that apply)

- The Section 8 Administrative Plan
- Briefing sessions and written materials
- Other (list below)

b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

- Through published notices
- Other (list below)

*NYCHA receives direct referrals for special programs. NYCHA partners with agencies such as the Department of Veterans Affairs (“VA”), Administration for Children Services as required for the special program type.*

**2. Financial Resources**

[24 CFR Part 903.7 (c)]

<b>Financial Resources: 2019 Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2019 grants)</b>		
a) Public Housing Operating Fund	\$885,597,635	
b) Public Housing Capital Fund (2018 Grant)	\$523,509,743	
c) Annual Contributions for Section 8 Tenant-Based Assistance	\$1,116,242,690	
Other Federal Grants (list below)		

<b>Financial Resources: 2019 Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
FSS Self Sufficiency	\$288,000	<i>Self Sufficiency Services</i>
<b>2. Prior Year Federal Grants (unobligated funds only) (as of August 31, 2018)</b>		
FY 2015 Capital Fund	\$0	<i>Modernization</i>
FY 2016 Capital Fund	6,548,443	<i>Modernization</i>
FY 2017 Capital Fund	\$96,385,248	<i>Modernization</i>
Replacement Housing Factor	\$3,120,290	<i>New affordable housing construction</i>
HOPE VI Revitalization	\$34,943	<i>New construction at Prospect Plaza</i>
Public Housing Development Grants	\$420,081	<i>Modernization of former City/State developments</i>
<b>1. Public Housing Dwelling Rental Income (includes City and State Developments)</b>	\$1,087,285,468	<i>Public housing operations, safety and security, and supportive services</i>
<b>4. Other income (list below)</b>		
Other Revenue from Operations (includes City and State Developments)	\$21,976,500	<i>Public Housing Operations</i>
Interest Income	\$9,280,091	<i>Public Housing Operations</i>
Other Categorical Grants	\$898,000	<i>Improve residents' self-sufficiency, Summer intern program, and support for Resident Watch program</i>
Miscellaneous Income (includes Debt Service)	\$186,565,130	<i>Public housing operations, safety and security, and supportive services</i>
<b>Total Resources</b>	<b>\$3,938,152,262</b>	

### **3. Rent Determination**

[24 CFR Part 903.7 (d)]

#### **Public Housing**

a. Use of discretionary policies: (select one)

- The PHA will not employ any discretionary rent-setting policies for income-based rent in public housing. Income-based rents are set at the higher of 30 percent of adjusted monthly income, 10 percent of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))

---or---

- The PHA employs discretionary policies for determining income-based rent (If selected, continue to question b.)

b. Minimum Rent

1. What amount best reflects the PHA's minimum rent? (select one)

- \$0  
 \$1-\$25  
 \$26-\$50

2.  Yes  No: Has the PHA adopted any discretionary minimum rent hardship exemption policies?

c. Rents set at less than 30 percent than adjusted income

1.  Yes  No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30 percent of adjusted income?

d. Which of the discretionary (optional) deductions and/or exclusions policies does the PHA plan to employ? (select all that apply)

- For the earned income of a previously unemployed household member

*NYCHA has implemented the earned income disallowance set forth in 42 U.S.C. §1437a(d).*

- For increases in earned income  
 Fixed amount (other than general rent-setting policy)  
If yes, state amount/s and circumstances below:  
 Fixed percentage (other than general rent-setting policy)  
If yes, state percentage/s and circumstances below:  
 For household heads  
 For other family members  
 For transportation expenses  
 For the non-reimbursed medical expenses of non-disabled or non-elderly families  
 Other (describe below)

e. Ceiling rents

1. Do you have ceiling rents? (rents set at a level lower than 30 percent of adjusted income) (select one)
- Yes for all developments
  - Yes, but only for some developments
  - No

f. Rent re-determinations:

1. Between income reexaminations, how often must tenants report changes in income or family composition to the PHA such that the changes result in an adjustment to rent? (select all that apply)
- Never
  - At family option
  - Any time the family experiences an income increase  
*Due to addition of a family member or when there is an interim rent reduction with income subsequently restored.*
  - Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold) \_\_\_\_\_
  - Other (list below)  
*Decreases in family income must be reported as well as any change in family composition.*

- g.  Yes  No: Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12-month disallowance of earned income and phasing in of rent increases in the next year?

**(2) Flat Rents**

1. In setting the market-based flat rents, what sources of information did the PHA use to establish comparability? (select all that apply.)
- The section 8 rent reasonableness study of comparable housing
  - Survey of rents listed in local newspaper
  - Survey of similar unassisted units in the neighborhood
  - Other (list/describe below)

*NYCHA sets flat rents based on 80% of the applicable fair market rental established under 42 U.S.C. § 1437f(c). This is an allowable rent structure under 42 U.S.C. § 1437a(a)(2)(B)(i)(I)(aa).*

All current public housing residents, newly-admitted public housing residents or transferring public housing residents have the option of paying either the flat rent amount shown in the table on the next page or an income-based rent (calculated at the higher of: 30 % of adjusted household income, 10% of gross household income, or the welfare rent), whichever is lower. NYCHA automatically charges residents the lower rent.

**Effective January 1, 2019:** Newly-admitted public housing residents or transferring public housing residents who will pay flat rent rather than income-based rent will pay the new flat rent amounts listed in the table below.

**Effective 1st Quarter 2019 Annual Reviews (with a new rent effective date of May 1, 2019):** Current public housing residents whose family's annual income is reviewed in this quarter who will

pay flat rent rather than income-based rent will pay the new flat rent amounts listed in the table below.

Apartment Size	FY 2019 Fair Market Rent	NYCHA's Flat Rent 80% of FY 2019 Fair Market Rent
Studio	\$1,559	\$1,247
1 Bedroom	\$1,599	\$1,279
2 Bedroom	\$1,831	\$1,464
3 Bedroom	\$2,324	\$1,859
4 Bedroom	\$2,475	\$1,980
5 Bedroom	\$2,846	\$2,277
6 Bedroom	\$3,218	\$2,574

## Section 8 Tenant-Based Assistance

### (1) Payment Standards

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)

- At or above 90 percent but below 100 percent of FMR
- 100 percent of FMR
- Above 100 percent but at or below 110 percent of FMR
- Above 110 percent of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

- FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- The PHA has chosen to serve additional families by lowering the payment standard
- Reflects market or submarket
- Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

- FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- Reflects market or submarket
- To increase housing options for families
- Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

- Annually
- Other (list below)

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard?  
(select all that apply)

- Success rates of assisted families
- Rent burdens of assisted families
- Other (list below)

*Federal Budget appropriation*

**(2) Minimum Rent**

a. What amount best reflects the PHA's minimum rent? (select one)

- \$0
- \$1-\$25
- \$26-\$50

b.  Yes  No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

*Exemption policies are described in the Section 8 Administrative Plan, which is a Supporting Document available for review. Members of the public wishing to examine the Supporting Documents may do so, during regular business hours, by contacting NYCHA's central office, located at 250 Broadway, New York, New York, at (212) 306-3701 to schedule an appointment to review the documents. The document is also available on NYCHA's webpage at <http://www1.nyc.gov/assets/nycha/downloads/pdf/Housing-Choice-Voucher-Program.pdf>*



#### **4. Operation and Management**

[24 CFR Part 903.7 (e)]

##### **A. PHA Management Structure**

- An organization chart showing the PHA’s management structure and organization is attached. (**Attachment H**)

##### **B. HUD Programs Under PHA Management**

List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use “NA” to indicate that the PHA does not operate any of the programs listed below.)

<b>Program Name</b>	<b>Units Or Families Served At Year Beginning 2018</b>	<b>Expected Turnover</b>
Public Housing	175,636	4,500
Section 8 Vouchers	84,994	4,040
ROSS Service Coordinator Grant 2015: To enhance self-sufficiency by accessing employment and other economic-related resources and opportunities to NYCHA residents through geographically-based service coordination.	491 individuals from reporting period 09/01/17 to 08/31/18	N/A
<i>Other Federal Programs (list individually)</i>		
City Harvest Mobile Market Program	272,805 lbs. of produce to approximately 7,500 participants monthly	N/A
Elderly Safe at Home	An average of 191 residents served monthly	N/A
Senior Resident Advisor	An average of 581 residents are served monthly	N/A
Family Self Sufficiency Program:  A HUD initiative that promotes economic self-sufficiency among participating families by referring them to educational, career counseling, money management, job training as well as	907 enrollments as of 12/31/17 to 08/31/18	N/A

<p>job placement services. Participants receive a savings account which grows as the family’s earned income increases. Upon completion of the five-year FSS Contract of Participation, the family receives the money accumulated in the account, provided that the participant is employed, and no family member has received cash public assistance in the preceding twelve months.</p>		
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**C. Management and Maintenance Policies**

(1) Public Housing Maintenance and Management: (list below)

- NYCHA Management Manual
- NYCHA Application and Tenancy Administration Manual
- NYCHA Tenant Selection and Assignment Plan (TSAP) Manual
- NYCHA Human Resources Manual
- NYCHA Emergency Procedure Manual
- NYCHA Contract Procedure Resolution
- NYCHA General Memoranda
- NYCHA Deputy General Manager Memoranda
- NYCHA Standard Procedures

(2) Section 8 Management: (list below)

- NYCHA Leased Housing Department Memoranda
- NYCHA Section 8 Administrative Plan
- NYCHA Housing Applications Manual

Members of the public wishing to examine the Management and Maintenance Policies may do so, during Regular business hours, by contacting NYCHA’s central office, located at 250 Broadway, New York, New York, at (212) 306-3701 to schedule an appointment to review the documents.

**5. PHA Grievance Procedures**

[24 CFR Part 903.7 (f)]

**A. Public Housing**

1.  Yes  No: Has the PHA established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing?

If yes, list additions to federal requirements below:

2. Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)

- PHA main administrative office
- PHA development management offices
- Other (list below)

**B. Section 8 Tenant-Based Assistance**

1.  Yes  No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

If yes, list additions to federal requirements below:

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)
- PHA main administrative office
  - Other (list below)

*Written request to the Leased Housing Department.  
Calling the Customer Contact Center*

**6. Designated Housing for Elderly and Disabled Families**

[24 CFR Part 903.7 (i)]

1.  Yes  No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year?

*On July 21, 2017, HUD approved NYCHA’s request to continue to extend the designation of the elderly-only developments and buildings for an additional two years.*

<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Louis Armstrong I</b> 1b. Development (project) number: <b>NY005012100</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 95 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Baruch Houses Addition</b> 1b. Development (project) number: <b>NY005010600</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 197 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Dr. Ramon E. Betances I</b> 1b. Development (project) number: <b>NY005012110</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>

<p>3. Application status (select one)          Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>          Submitted, pending approval <input type="checkbox"/>          Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 21, 2017</b></p>
<p>5. If approved, will this designation constitute a (select one)  <input type="checkbox"/> New Designation Plan  <input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 88          7. Coverage of action (select one)  <input checked="" type="checkbox"/> Part of the development  <input type="checkbox"/> Total development</p>
<p><b>Designation of Public Housing Activity Description</b></p>
<p>1a. Development name: <b>Mary McLeod Bethune Gardens</b>          1b. Development (project) number: <b>NY005010030</b></p>
<p>2. Designation type:          Occupancy by only the elderly <input checked="" type="checkbox"/>          Occupancy by families with disabilities <input type="checkbox"/>          Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)          Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>          Submitted, pending approval <input type="checkbox"/>          Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 21, 2017</b></p>
<p>5. If approved, will this designation constitute a (select one)  <input type="checkbox"/> New Designation Plan  <input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 210          7. Coverage of action (select one)  <input type="checkbox"/> Part of the development  <input checked="" type="checkbox"/> Total development</p>
<p><b>Designation of Public Housing Activity Description</b></p>
<p>1a. Development name: <b>Borinquen Plaza I</b>          1b. Development (project) number: <b>NY005012430</b></p>
<p>2. Designation type:          Occupancy by only the elderly <input checked="" type="checkbox"/>          Occupancy by families with disabilities <input type="checkbox"/>          Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)          Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>          Submitted, pending approval <input type="checkbox"/>          Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 21, 2017</b></p>
<p>5. If approved, will this designation constitute a (select one)  <input type="checkbox"/> New Designation Plan  <input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>

6. Number of units affected: 144 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Boston Road Plaza</b> 1b. Development (project) number: <b>NY005010390</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 235 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Bronx River Addition</b> 1b. Development (project) number: <b>NY005010320</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 226 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Reverend Randolph Brown</b> 1b. Development (project) number: <b>NY005012520</b>

<p>2. Designation type:  Occupancy by only the elderly <input checked="" type="checkbox"/>  Occupancy by families with disabilities <input type="checkbox"/>  Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)  Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>  Submitted, pending approval <input type="checkbox"/>  Planned application <input type="checkbox"/></p>
<p>Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 21, 2017</b></p>
<p>5. If approved, will this designation constitute a (select one)  <input type="checkbox"/> New Designation Plan  <input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 200  7. Coverage of action (select one)  <input type="checkbox"/> Part of the development  <input checked="" type="checkbox"/> Total development</p>
<p align="center"><b>Designation of Public Housing Activity Description</b></p>
<p>1a. Development name: <b>Cassidy-Lafayette</b>  1b. Development (project) number: <b>NY005011170</b></p>
<p>2. Designation type:  Occupancy by only the elderly <input checked="" type="checkbox"/>  Occupancy by families with disabilities <input type="checkbox"/>  Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)  Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>  Submitted, pending approval <input type="checkbox"/>  Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 21, 2017</b></p>
<p>5. If approved, will this designation constitute a (select one)  <input type="checkbox"/> New Designation Plan  <input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 380  7. Coverage of action (select one)  <input type="checkbox"/> Part of the development  <input checked="" type="checkbox"/> Total development</p>
<p align="center"><b>Designation of Public Housing Activity Description</b></p>
<p>1a. Development name: <b>Chelsea Addition</b>  1b. Development (project) number: <b>NY005011340</b></p>
<p>2. Designation type:  Occupancy by only the elderly <input checked="" type="checkbox"/>  Occupancy by families with disabilities <input type="checkbox"/>  Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)  Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>  Submitted, pending approval <input type="checkbox"/>  Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 21, 2017</b></p>

<p>5. If approved, will this designation constitute a (select one)</p> <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
<p>6. Number of units affected: 96</p> <p>7. Coverage of action (select one)</p> <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
<p>1a. Development name: <b>Claremont Parkway-Franklin Avenue</b></p> <p>1b. Development (project) number: <b>NY005013420</b></p>
<p>2. Designation type:</p> <p>Occupancy by only the elderly <input checked="" type="checkbox"/></p> <p>Occupancy by families with disabilities <input type="checkbox"/></p> <p>Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)</p> <p>Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 21, 2017</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
<p>6. Number of units affected: 116</p> <p>7. Coverage of action (select one)</p> <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
<p>1a. Development name: <b>College Avenue-East 165<sup>th</sup> Street</b></p> <p>1b. Development (project) number: <b>NY005013080</b></p>
<p>2. Designation type:</p> <p>Occupancy by only the elderly <input checked="" type="checkbox"/></p> <p>Occupancy by families with disabilities <input type="checkbox"/></p> <p>Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)</p> <p>Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 21, 2017</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
<p>6. Number of units affected: 95</p> <p>7. Coverage of action (select one)</p> <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>



1a. Development name: <b>College Point Rehab</b> 1b. Development (project) number: <b>NY005011860</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 13 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>John Conlon LIHFE Towers</b> 1b. Development (project) number: <b>NY005010910</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 216 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Edward Corsi</b> 1b. Development (project) number: <b>NY005010640</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>

Submitted, pending approval <input type="checkbox"/>
Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 171
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Davidson</b>
1b. Development (project) number: <b>NY005013420</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 56
7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>East 152<sup>nd</sup> Street-Courtlandt Avenue</b>
1b. Development (project) number: <b>NY005010280</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 130

7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Fort Washington Avenue Rehab</b> 1b. Development (project) number: <b>NY005013090</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 226 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Marcus Garvey (Group A)</b> 1b. Development (project) number: <b>NY005012520</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 86 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Glebe Avenue-Westchester Avenue</b> 1b. Development (project) number: <b>NY005010670</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/>

Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 132 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Bernard Haber</b> 1b. Development (project) number: <b>NY005011660</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 380 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Harborview Terrace</b> 1b. Development (project) number: <b>NY005010220</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?

6. Number of units affected: 195 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Hope Gardens</b> 1b. Development (project) number: <b>NY005012470</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
74. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 130 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>International Tower</b> 1b. Development (project) number: <b>NY005010910</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 159 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Kingsborough Extension</b> 1b. Development (project) number: <b>NY005010100</b>
2. Designation type:

Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 184 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Mayor Fiorello H. LaGuardia Addition</b> 1b. Development (project) number: <b>NY005010760</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 150 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Leavitt Street-34<sup>th</sup> Avenue</b> 1b. Development (project) number: <b>NY005011860</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 21, 2017</b>

<p>5. If approved, will this designation constitute a (select one)</p> <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
<p>6. Number of units affected:83</p> <p>7. Coverage of action (select one)</p> <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
<p>1a. Development name: <b>Lower East Side I Infill</b></p> <p>1b. Development (project) number: <b>NY005011000</b></p>
<p>2. Designation type:</p> <p>Occupancy by only the elderly <input checked="" type="checkbox"/></p> <p>Occupancy by families with disabilities <input type="checkbox"/></p> <p>Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)</p> <p>Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 21, 2017</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
<p>6. Number of units affected: 72</p> <p>7. Coverage of action (select one)</p> <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
<p>1a. Development name: <b>Justice Thurgood Marshall Plaza</b></p> <p>1b. Development (project) number: <b>NY005010030</b></p>
<p>2. Designation type:</p> <p>Occupancy by only the elderly <input checked="" type="checkbox"/></p> <p>Occupancy by families with disabilities <input type="checkbox"/></p> <p>Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)</p> <p>Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 21, 2017</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
<p>6. Number of units affected:180</p> <p>7. Coverage of action (select one)</p> <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>

1a. Development name: <b>Judge Max Meltzer Tower</b> 1b. Development (project) number: <b>NY005011000</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 231 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Middletown Plaza</b> 1b. Development (project) number: <b>NY005010340</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 179 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Mayor John Purroy Mitchel</b> 1b. Development (project) number: <b>NY005011450</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>



<p>3. Application status (select one)          Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>          Submitted, pending approval <input type="checkbox"/>          Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: July 21, 2017</p>
<p>5. If approved, will this designation constitute a (select one)  <input type="checkbox"/> New Designation Plan  <input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 165          7. Coverage of action (select one)  <input checked="" type="checkbox"/> Part of the development  <input type="checkbox"/> Total development</p>
<p><b>Designation of Public Housing Activity Description</b></p>
<p>1a. Development name: <b>Morris Park Senior Citizens Home</b>          1b. Development (project) number: <b>NY005012410</b></p>
<p>2. Designation type:          Occupancy by only the elderly <input checked="" type="checkbox"/>          Occupancy by families with disabilities <input type="checkbox"/>          Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)          Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>          Submitted, pending approval <input type="checkbox"/>          Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: July 21, 2017</p>
<p>5. If approved, will this designation constitute a (select one)  <input type="checkbox"/> New Designation Plan  <input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 97          7. Coverage of action (select one)  <input type="checkbox"/> Part of the development  <input checked="" type="checkbox"/> Total development</p>
<p><b>Designation of Public Housing Activity Description</b></p>
<p>1a. Development name: <b>Morrisania Air Rights</b>          1b. Development (project) number: <b>NY005012670</b></p>
<p>2. Designation type:          Occupancy by only the elderly <input checked="" type="checkbox"/>          Occupancy by families with disabilities <input type="checkbox"/>          Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)          Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>          Submitted, pending approval <input type="checkbox"/>          Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: July 21, 2017</p>
<p>5. If approved, will this designation constitute a (select one)  <input type="checkbox"/> New Designation Plan  <input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>

6. Number of units affected: 300
7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>New Lane Area</b>
1b. Development (project) number: <b>NY005010350</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 277
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Palmetto Gardens</b>
1b. Development (project) number: <b>NY005012470</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 115
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>P.S. 139 (Conversion)</b>
1b. Development (project) number: <b>NY005011110</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/>

Occupancy by families with disabilities <input type="checkbox"/>
Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 125
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Randall Avenue – Balcom Avenue</b> 1b. Development (project) number: <b>NY005010630</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 252
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>William Reid Apartments</b> 1b. Development (project) number: <b>NY005011670</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan

<input type="checkbox"/> Revision of a previously-approved Designation Plan? 6. Number of units affected: 230 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Ira S. Robbins Plaza</b> 1b. Development (project) number: <b>NY005011390</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 150 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Eleanor Roosevelt I</b> 1b. Development (project) number: <b>NY005011350</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 159 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Shelton Houses</b> 1b. Development (project) number: <b>NY005010910</b>

<p>2. Designation type:  Occupancy by only the elderly <input checked="" type="checkbox"/>  Occupancy by families with disabilities <input type="checkbox"/>  Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)  Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>  Submitted, pending approval <input type="checkbox"/>  Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: July 21, 2017</p>
<p>5. If approved, will this designation constitute a (select one)  <input type="checkbox"/> New Designation Plan  <input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 155  7. Coverage of action (select one)  <input type="checkbox"/> Part of the development  <input checked="" type="checkbox"/> Total development</p>
<p><b>Designation of Public Housing Activity Description</b></p>
<p>1a. Development name: <b>Sondra Thomas Apartments</b>  1b. Development (project) number: <b>NY005011270</b></p>
<p>2. Designation type:  Occupancy by only the elderly <input checked="" type="checkbox"/>  Occupancy by families with disabilities <input type="checkbox"/>  Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)  Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>  Submitted, pending approval <input type="checkbox"/>  Planned application <input type="checkbox"/></p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: July 21, 2017</p>
<p>5. If approved, will this designation constitute a (select one)  <input type="checkbox"/> New Designation Plan  <input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 87  7. Coverage of action (select one)  <input type="checkbox"/> Part of the development  <input checked="" type="checkbox"/> Total development</p>
<p><b>Designation of Public Housing Activity Description</b></p>
<p>1a. Development name: <b>Peter Stuyvesant Gardens II</b>  1b. Development (project) number: <b>NY005012210</b></p>
<p>2. Designation type:  Occupancy by only the elderly <input checked="" type="checkbox"/>  Occupancy by families with disabilities <input type="checkbox"/>  Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)  Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/>  Submitted, pending approval <input type="checkbox"/>  Planned application <input type="checkbox"/></p>

4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 150 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Surfside Gardens</b> 1b. Development (project) number: <b>NY005011700</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 270 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Twin Parks East (Site 9)</b> 1b. Development (project) number: <b>NY005012270</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 219 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Union Avenue-East 163<sup>rd</sup> Street</b> 1b. Development (project) number: <b>NY005013420</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 200 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>UPACA (Site 5)</b> 1b. Development (project) number: <b>NY005012410</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 200 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>UPACA (Site 6)</b> 1b. Development (project) number: <b>NY005012410</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one)

Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 150 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Van Dyke II</b> 1b. Development (project) number: <b>NY005011680</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 112 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Vandalia Avenue</b> 1b. Development (project) number: <b>NY005011940</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 293



7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>West Brighton II</b> 1b. Development (project) number: <b>NY005010130</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 144 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>West Tremont Avenue-Sedgwick Avenue</b> 1b. Development (project) number: <b>NY005010450</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 148 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Gaylord White</b> 1b. Development (project) number: <b>NY005010090</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/>

Occupancy by families with disabilities <input type="checkbox"/>
Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 248 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Carter G. Woodson</b> 1b. Development (project) number: <b>NY005011680</b>
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation <b>approved</b> , submitted, or planned for submission: July 21, 2017
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 407 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

## **7. Community Service and Self-Sufficiency**

[24 CFR Part 903.7 (l)]

### **A. PHA Coordination with the Welfare ("TANF") Agency**

1. Cooperative agreements:

- Yes  No: Has the PHA entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

If yes, what was the date that agreement was signed?

- Data Sharing – March 28, 2001

- Electronic Funds Transfer – April 9, 1998
- Data Sharing – December 5, 2014
- Data Sharing – July 14, 2015
- Data Sharing – April 16, 2018

2. Other coordination efforts between the PHA and TANF agency (select all that apply)

- Client referrals
- Information sharing regarding mutual clients (for rent determinations and otherwise)
- Coordinate the provision of specific social and self-sufficiency services and programs to eligible families
- Jointly administer programs
- Partner to administer a HUD Welfare-to-Work voucher program
- Joint administration of other demonstration program
- Other (describe)

**B. Services and programs offered to residents and participants**

**(1) General**

a. Self-Sufficiency Policies

Which, if any of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas? (Select all that apply)

- Public housing rent determination policies:

*For the earned income of a previously unemployed household member, NYCHA has implemented the Earned Income Disallowance set forth in 42 U.S.C. §1437a(d).*

- Public housing admissions policies:

*Working family priorities are assigned by income tier with the first number representing Tier III (households with incomes between 51% and 80% AMI), followed by Tier II (households with incomes between 30% to 50% AMI), and then Tier I (households with incomes at 30% AMI or less).*

- Section 8 admissions policies
- Preference in admission to section 8 for certain public housing families
- Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA
- Preference/eligibility for public housing homeownership option participation
- Preference/eligibility for section 8 homeownership option participation
- Other policies (list below)

b. Economic and Social self-sufficiency programs

- Yes  No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If “yes”, complete the following tables; if “no” skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use.)

<b>Program Name</b>	<b>Units or Families Served at Year Beginning 2018</b>	<b>Expected Turnover</b>
ROSS Service Coordinator Grant 2015: To enhance self-sufficiency by accessing employment and other economic-related resources and opportunities to NYCHA residents through geographically-based service coordination.	491 individuals from reporting period 09/01/17 to 08/31/18	N/A
Family Self Sufficiency Program: A HUD initiative that promotes economic self-sufficiency among participating families by referring them to educational, career counseling, money management, job training as well as job placement services. Participants receive a savings account which grows as the family's earned income increases. Upon completion of the five-year FSS Contract of Participation, the family receives the money accumulated in the account, provided that the participant is employed, and no family member has received cash public assistance in the preceding twelve months.	907 program enrollments as of 08/31/18	N/A

**Services and Programs**

<b>Program Name &amp; Description (including location, if appropriate)</b>	<b>Estimated Size</b>	<b>Allocation Method (waiting list/random selection/specific criteria/other)</b>	<b>Access (development office / PHA main office / other provider name)</b>	<b>Eligibility (public housing or section 8 participants or both)</b>
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**NYCHA's Office of Resident Economic Empowerment and Sustainability (REES) Intake & Assessment**

REES and Partner Information Sessions: Participants receive an orientation to REES and REES partner services, as well as an individual assessment and referrals to REES partner providers for appropriate services	3,304 Public Housing residents attended an information session from reporting period	Self-referred, unemployed and under-employed public housing & Section 8 residents	REES offices located at central office location in Downtown Brooklyn / Offsite information sessions once a month at NYCHA	Public Housing Residents/ Section 8 Residents
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	09/07/17 to 08/31/18		community centers	
REES Hotline Activity: The REES hotline facilitates over the phone resident self-refers to partner programs and serves as a resource for residents to RSVP for upcoming events, testing and information sessions.	23,062 calls handled from reporting period 09/01/17 to 08/31/18	Self-referred, unemployed and under-employed public housing & section 8 residents	Via phone	Public Housing /Section 8 residents
REES Microsite Activity: The microsite provides information about economic opportunity services, events and job opportunities available through REES and its partners. Residents can use the site to take action and “self-refer” to programs through downloadable referral slips and RSVP for events.	124,635 unique visitors from reporting period 09/07/17 to 08/31/18	Self-referred, unemployed and under-employed public housing & section 8 residents	Via REES’ microsite: www.opportunit ynycha.org	Public Housing / Section 8 residents
<b>REES Job Placement</b>				
Direct job placement facilitated by REES through the Section 3 mandate, the NYCHA REP policy, the NYCHA Resident Training Academy, and outside employers	941 direct job placements from reporting period 09/01/17 to 08/31/18	Self-referred unemployed and under-employed public housing residents	REES offices located at central office location in Downtown Brooklyn	Public Housing Residents
Section 3: A HUD-mandated regulation whose purpose is to ensure that employment and other economic opportunities generated by Federal assistance to public housing authorities shall, to the greatest extent feasible, be directed to public housing residents and other low and very low-income persons. Resident Employment Program (REP): An alternative program for implementing Section 3. Established on January 1, 2001, REP requires that 15% of the total labor cost (including fringe	369 Projected Hires on contracts award from reporting period 09/01/17 to 08/31/18	Public Housing and Section 3 Residents	REES offices at Downtown Brooklyn, Contractor and work locations throughout NYCHA	Public Housing & Section 3 residents

<p>benefits) of a contract in excess of \$500,000 for modernization, new construction and building maintenance work taking place at public housing developments, be expended on resident hiring and/or training.</p>				
<p>Jobs Plus:  Through 10 coordinated sites, the Jobs Plus employment program seeks to raise the level of employment for the residents of selected developments by increasing family income through:  Employment related services  Rent incentives that help make work pay  Neighbor to neighbor support to work</p> <ul style="list-style-type: none"> <li>• Jobs-Plus is administered by NYCHA, HRA, CEO and OFE</li> <li>• 1 of the 10 Jobs-Plus sites is funded through the HUD Jobs Plus Initiative Grant</li> </ul>	<p>1,454 Placements from reporting period 09/01/18 to 08/31/18</p>	<p>Public Housing Residents</p>	<ul style="list-style-type: none"> <li>• East Harlem – Hostos Community College</li> <li>• South Bronx Site I – Bronx Works</li> <li>• South Bronx Site II – East Side Settlement House</li> <li>• Western Queens – Urban Upbound</li> <li>• Lower East Side – Henry Street Settlement House</li> <li>• Central Brooklyn – Bedford Stuyvesant Restoration Corporation</li> <li>• Brownsville Brooklyn-Grant Associates</li> <li>• Northwest Bronx – Goodwill Industries</li> <li>• Staten Island – Arbor ResCare</li> <li>• Offsite location serving</li> </ul>	<p>Public Housing Residents</p> <p>Must be a public housing resident of target site location.</p>

			Penn- Wortman	
<b>REES Connection to Services</b>				
Recruitment for Cohort Based Services and program enrollment: Services in the following categories are offered through REES partners in the five boroughs Vocational Training Adult Education Financial Education <ul style="list-style-type: none"> <li>• Business Planning</li> </ul>	728 residents enrolled in classes and trainings as of reporting period 09/01/17 to 08/31/18	Residents are recruited in time-bound, targeted recruitment campaigns that may include information sessions, pre-screening events, and targeted mailings, phone-banking and web-based outreach. Recruitment is based on minimum criteria of each program	Services provided at partner locations	Public Housing Residents/ Section 8 residents
Referrals to Ongoing Services: Services in the following categories are offered through REES partners in the five boroughs <ul style="list-style-type: none"> <li>• Vocational Training</li> <li>• Adult Education</li> <li>• Financial Counseling</li> <li>• SNAP Access</li> <li>• Workforce Development</li> <li>• Business Planning</li> </ul>	1,582 unique residents were referred to ongoing services from reporting period 09/01/17 to 08/31/18	Residents are referred by NYCHA staff from multiple departments, including REES, through a web-based system that notifies providers to engage with a referred resident. There are no minimum criteria other than the residents consent to participate in the service provision.	Services provided at partner locations	Public Housing / Section 8
NYCHA Resident Training Academy (NRTA): Provides employment-focused training and job placement assistance to NYCHA residents in the constructional and janitorial fields (supported by the Robin Hood Foundation)	210 graduates in the NRTA program year as of reporting period	Public housing residents are recruited through multiple outreach channels and complete an initial pre-screen	City Technical College/ Brooklyn Workforce Innovations	Public Housing Residents

	09/01/17 to 08/31/18	with REES staff. Program referrals are based on testing, pre-screening, interest, and other eligibility requirements and qualifications.		
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## **2) Family Self Sufficiency Program**

### a. Participation Description

<b>Family Self Sufficiency (“FSS”) Participation</b>		
<b>Program</b>	<b>Required Number of Participants (start of FY 2013 Estimate)</b>	<b>Actual Number of Enrolled Participants (As of: 08/31/18)</b>
Public Housing	0	0
Section 8	0	907

- b.  Yes  No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?  
If no, list steps the PHA will take below:

Since the fall of 2010, REES has operated the Housing Choice Voucher (“HCV”) (Section 8) Family Self Sufficiency (“FSS”) program. As of August 31, 2018, the program has enrolled 907 participants, of which 398 or 44% have escrow accounts averaging \$3,635 per participant in escrow. The program is currently staffed by an FSS Manager and two FSS Associates. In 2017, NYCHA’s FSS program began participating in the HUD Family Unification Program (FUP) demonstration initiative with a focus on recruiting youth who have aged out of foster care, and have received NYCHA vouchers, into the FSS program. In addition to receiving the standard FSS benefits, FUP youth who enroll in FSS can extend the duration of their NYCHA Section 8 voucher from 36 months to five years. Additionally, in 2017 the FSS program focused recruitment efforts to residents participating in the Rental Demonstration Program (RAD).

### **C. Welfare Benefit Reductions**

1. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)

- Adopting appropriate changes to the PHA’s public housing rent determination policies and train staff to carry out those policies
- Informing residents of new policy on admission and reexamination
- Actively notifying residents of new policy at times in addition to admission and reexamination.
- Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services



- Establishing a protocol for exchange of information with all appropriate TANF agencies
- Other: (list below)

## **8. Safety and Crime Prevention**

[24 CFR Part 903.7 (m)]

### **A. Need for measures to ensure the safety of public housing residents**

1. Describe the need for measures to ensure the safety of public housing residents (select all that apply)

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- Residents fearful for their safety and/or the safety of their children
- Observed lower-level crime, vandalism and/or graffiti
- People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- Other (describe below)

*NYCHA recognizes the need to ensure the safety of public housing residents and works closely with the New York City Police Department's Housing Bureau. It is the mission of the New York City Police Department to enhance the quality of life in our City by working in partnership with the community and in accordance with constitutional rights to enforce the laws, preserve the peace, reduce fear, and provide for a safe environment. The Housing Bureau has developed a one-year plan designed to increase the safety and security of residents of public housing. The Strategic Plan for the New York City Police Department's Housing Bureau is included in the Supporting Documents of the Annual Plan.*

2. What information or data did the PHA used to determine the need for PHA actions to improve safety of residents. (select all that apply)

- Safety and security survey of residents
- Analysis of crime statistics over time for crimes committed "in and around" public housing authority
- Analysis of cost trends over time for repair of vandalism and removal of graffiti
- Resident reports
- PHA employee reports
- Police reports
- Demonstrable, quantifiable success with previous or ongoing anticrime/anti-drug programs
- Other (describe below)

3. Which developments are most affected? (list below)

*The Strategic Plan for the New York City Police Department's Housing Bureau is included in the Supporting Documents of the Annual Plan.*

### **B. Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year**

1. List the crime prevention activities the PHA has undertaken or plans to undertake: (select all that apply)

- Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities
- Crime Prevention Through Environmental Design
- Activities targeted to at-risk youth, adults, or seniors
- Volunteer Resident Patrol/Block Watchers Program
- Other (describe below)

2. Which developments are most affected? (list below)

*The Strategic Plan for the New York City Police Department's Housing Bureau is included in the Supporting Documents of the Annual Plan.*

**C. Coordination between PHA and the police**

1. Describe the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities: (select all that apply)

- Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan
- Police provide crime data to housing authority staff for analysis and action
- Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- Police regularly testify in and otherwise support eviction cases
- Police regularly meet with the PHA management and residents
- Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services
- Other activities (list below)

2. Which developments are most affected? (list below)

*The Strategic Plan for the New York City Police Department's Housing Bureau is included in the Supporting Documents of the Annual Plan.*

**D. Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking;**

NYCHA makes referrals to the following organizations:

- **Sanctuary for Families** is a New York City-based non-profit organization dedicated to aiding victims of domestic violence and their children. Its services include crisis intervention, emergency and transitional shelter, legal assistance and representation, adult and child counseling, and long-term follow-up. Its Legal Center is one of the largest providers of free legal services exclusively for victims of domestic violence, sex trafficking, and other forms of gender-based violence in the United States.
- **Safe Horizon** is a victim assistance organization designed to provide support, prevent violence, and promote justice for victims of crime and abuse. Its programs help survivors of domestic violence rebuild their lives through counseling, short term housing, legal and other support.
- **Queens District Attorney's Office** has a Domestic Violence Bureau, which prosecutes misdemeanor and felony cases involving domestic partners. The Bureau, in collaboration with Safe Horizon, offers a domestic violence education component to police, hospital staff and community organizations.
- **Project SAFE** offers services for those who have experienced a crime in which the security of their home has been compromised. Project SAFE will send a professional locksmith to change

the lock or cylinder for free, provided the victim has the requisite police reports and qualifies for a free lock change.

- **Brooklyn Defender Services:** Their staff of 300 comprises of 180 attorneys and 120 support staff, including social workers, investigators, paralegals, re-entry specialists, jail liaisons, education, community organizers and policy specialists as well as dedicated advocates for youth, veterans and parents. They serve their clients in the courtroom and in the community, defending their rights and helping them to amplify their voices to call for the changes that they see are necessary for the health and success of their neighborhoods.
- **Prevention Assistance and Temporary Housing (PATH):** People who leave unsafe environments and need temporary shelter can get help through PATH.
- **CAMBA – Bedford-Stuyvesant Multi-Service Center:** Family Violence Prevention and Intervention: CAMBA offers a 24/7 victims' hotline, escort services, crisis counseling, individual and group support and education, advocacy, emergency cash assistance and referrals to other services for victims of violence within the home.
- **East New York Family Center Brooklyn Community Services:** Organization providing children and families with counseling, foster care placement prevention. Services include – Local health/social services, Domestic abuse/victims' services, Home-based family services program, and child abuse and neglect preventive services.
- **Good Shepherd Services - Safe Homes Project:** The Safe Homes Project (SHP) is a community-based domestic violence advocacy and service program which provides a hotline, counseling, safety-planning and advocacy for survivors of domestic violence and runs a 20-bed shelter. Provides targeted services for special populations, including Spanish-speakers, youth, and LGBTQ survivors of partner violence.
- **Domestic Violence Aftercare Program:** The Domestic Violence Aftercare Program, operated by HRA, provides supportive services, referrals and advocacy to NYCHA tenants and their authorized family members to successfully and safely relocate to their new home through NYCHA's Emergency Transfer Program. The services include assistance with relocation, safety planning, in-home case management, and referrals as needed; services are free, voluntary and confidential.

**E. Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing**

**NYCHA makes referrals to the following organizations:**

- **New York City Family Justice Centers** are the outgrowth of the Mayor's Office to Combat Domestic Violence and the District Attorneys' offices. There are one stop shops in every borough that provides free and confidential assistance to survivors of intimate partner violence, sex trafficking and elder abuse. They welcome people of all ages, sexual orientations and gender identities, regardless of what language or immigration status or income. All centers are open Monday through Friday 9: 00am – 5:00pm. Bronx and Brooklyn center recently extended their hours to include evening hours. Walk-ins encouraged, no appointment necessary, spoken translation at every center. Services include: case management, counseling, therapy, psychiatry, financial and budgeting assistance, lawyers, DVP officers, prosecutors and NYC sheriff's office, and child care.
- The **Department for The Aging (DFTA)** offers funded elder abuse organizations.

- **Adult Protective Services (APS)** – Vulnerable adults who are being abuse, neglected and/or financially exploited are referred to APS for more intensive on going supports.
- F. Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families**

**NYCHA Departments:**

- NYCHA’s Family Partnerships department offers assistance, guidance, information and referrals to NYCHA resident survivors of intimate partner violence, sex trafficking and elder abuse.
- NYCHA’s Management Services prioritizes all emergency transfer request for those NYCHA resident survivors of intimate partner violence, sex trafficking and elder abuse.

**Events:**

- Annual intimate partner abuse and/or elder abuse conferences.
- DV/EA agencies are routinely invited to table at NYCHA resource fairs/ outreach events / family days, etc.
- NYCHA participates in the Mayor’s Office to Combat Domestic Violence Task Force

## **9. Pet Policy**

- 1. Dog/Cat:** A household may own either one dog or one cat. Such dog or cat must be registered in accordance with NYCHA's pet registration requirements.
- 2. Weight Limits** **As of February 1, 2010**, residents who wish to maintain a dog in their NYCHA apartment will be permitted to register such dog, provided the adult weight of the dog does not exceed **25** pounds. Specifically prohibited dogs (either full breed or mixed breed) include: **Doberman Pinscher, Pit Bull and Rottweiler**. Assistance and Service Animals are exempt from weight and breed restrictions.
- Prior to February 1, 2010, residents were permitted to register a dog, regardless of breed, provided the adult weight of the dog did not exceed 40 pounds.
- 3.Registration** Every household that owns a dog, a cat, or an Assistance or Service Animal **MUST** submit to NYCHA a registration form (available at the management office within **30** days after such dog, cat or an Assistance service animal was acquired. If tenant is adding a new pet after a pet has been removed from the household, (*e.g., the pet has passed away*), the tenant must provide proof the animal was removed from the household or complete NYCHA Form *040.299B, Animal Removal Affidavit*, if documentation cannot be provided. A dog or cat that is not registered may not reside in or visit a NYCHA apartment.
- 4.Dog Tag:** When in public or common areas, all dogs (including dogs that are Service Animals) must wear its NYCHA's tag on a collar around its neck. *Please note that this does not eliminate or replace New York City's dog license requirement (Health Code §161.04).*
- **Service and for Assistance Animals:** *A Service Animal is one that is individually trained to do work or perform tasks an individual with a disability.* One example is a guide dog for a visually impaired individual. Service animals must still be registered.
  - **Other Pets:** Reasonable quantities of other pets such as small caged birds (parakeets, canaries), fish and small caged animals (hamsters, gerbils, guinea pigs), maintained in accordance with the NYC Health Code, are permitted. These animals do not need registration. This paragraph does not apply to dogs or cats.
  - **Dangerous Pets:** Animals that are vicious, threatening, bite people or that are otherwise prohibited by law are not permitted in NYCHA apartments or on NYCHA property. Residents are not permitted to keep dangerous dogs, including fighting dogs or attack dogs, on NYCHA property.
  - **Pet Conduct:** Pets must be kept in a manner that will not create a nuisance, excessive noise or an unsafe or unsanitary condition. A pet must not injure, cause harm to, or threaten other people. A pet must not cause damage to personal property or to other animals. A pet must not damage NYCHA property or premises, including buildings (inside or outside an apartment), elevators, common grounds, trees, shrubs or ground cover.
  - **Pet Waste:** Pet owners must clean up after their pets, in their apartment and in public areas. Dispose of pet waste, including cat litter box filler, in the compactor with the

regular garbage, **not** in the toilet. Dogs must be curbed. Solid dog waste must be picked up.

- **Dog Leash:** A dog must always be kept on a leash, six feet long or less, while in a public area both inside and outside of NYCHA buildings.
- **Pet-Free Zone:** Pets are not allowed to enter a designated “no-pet” area, such as Management Offices, playgrounds, Community Facilities, laundry rooms, basement areas, barbecue areas, roofs or roof landings.
- **Spay/Neuter:** Dogs and cats must be spayed or neutered.
- **Vaccination:** Dogs and cats must have a current rabies vaccination.
- **Fee Exemptions:** No fees required.

## **10. Civil Rights Certification**

[24 CFR Part 903.7 (o)]

*Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.*

## **11. Fiscal Year Audit**

[24 CFR Part 903.7 (p)]

1.  Yes  No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))? (If no, skip to component 17.)

2.  Yes  No: Was the most recent fiscal audit submitted to HUD?

*Yes. The most recent fiscal audit for year 2017 has been completed and the final audit report was electronically submitted to the Federal Audit Clearinghouse on September 28, 2018.*

3.  Yes  No: Were there any findings as the result of that audit?

*No. The 2017 audit had no findings.*

4.  Yes  No: If there were any findings, do any remain unresolved?  
If yes, how many unresolved findings remain? \_\_\_\_\_

5.  Yes  No: Have responses to any unresolved findings been submitted to HUD?  
If not, when are they due (state below)?

*Not Applicable*

## **12. Asset Management**

[24 CFR Part 903.7 (q)]

1.  Yes  No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock, including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization,

disposition, and other needs that have not been addressed elsewhere in this PHA Plan?

*Please see Attachment B on pages 91 to 174 for information on NYCHA's activities related mixed finance modernization and development, demolition and disposition, conversion of public housing, homeownership, project-based vouchers and RAD/PACT. Please page 175 for the information on NYCHA's Capital Fund Grant.*

2. What types of asset management activities will the PHA undertake? (select all that apply)
- Not applicable
  - Private management
  - Development-based accounting
  - Comprehensive stock assessment
  - Other: (list below)

### **13. Violence Against Women Act (“VAWA”)**

NYCHA adheres to the federal Violence Against Women Act (“VAWA”) by providing protections to victims of domestic violence, dating violence, sexual assault, and stalking (VAWA victims). In accordance with VAWA, NYCHA (i) notifies public housing tenants and Section 8 participants of their rights under VAWA; (ii) protects eligible tenants and authorized household members from eviction or termination of Section 8 assistance based on their status as a VAWA victim; (iii) may terminate public housing tenancy or occupancy rights or Section 8 assistance to an abuser while protecting the rights of the VAWA victim and other authorized household members ; (iv) protects eligible applicants from being denied admission based on their status as VAWA victims; (v) affords eligible VAWA victims a transfer under its Public Housing and Section 8 emergency transfer plans; and (vi) links tenants to resources on safety planning, aftercare services, and alternative housing options. Additionally, NYCHA provides a transfer priority for intimidated victims, intimidated witnesses and victims of a traumatic incident as well as an admission preference for eligible victims of domestic violence and intimidated witnesses.

Additional details can be found on page 194 of Attachment E.

**ATTACHMENT B**  
**HOPE VI, MIXED FINANCE MODERNIZATION OR DEVELOPMENT,  
DEMOLITION AND/OR DISPOSITION, CONVERSION OF PUBLIC  
HOUSING, HOMEOWNERSHIP, PROJECT-BASED VOUCHERS AND  
RENTAL ASSISTANCE DEMONSTRATION (RAD)**

**A) Hope VI or Mixed Finance Modernization or Development**

- Yes  No: a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)
- b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name: **Prospect Plaza**
2. Development (project) number: **NY005002440**
3. Status of grant: (select the statement that best describes the current status)
  - Revitalization Plan under development
  - Revitalization Plan submitted, pending approval
  - Revitalization Plan approved
  - Activities pursuant to an approved Revitalization Plan underway

- Yes  No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?  
If yes, list development name/s below:

- Yes  No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?  
If yes, list developments or activities below:

***Hope VI Development***

**Prospect Plaza, Ocean Hill-Brownsville, Brooklyn** -- The Prospect Plaza Redevelopment Project is a phased redevelopment project located in the Ocean Hill-Brownsville section of Brooklyn. The first phase was completed in 2005, which included construction of 37 two-family homes. All homes were occupied during the summer of 2005, with 32 of the homes purchased by public housing residents that were first time home buyers. The second phase was completed in the summer of 2009, which included the construction of 150 affordable rental units with 45 units set aside for relocated Prospect Plaza and other public housing residents.

In May 2011, HUD granted conditional approval of the Prospect Plaza HOPE VI Revitalization Plan Amendment, which included demolition of the three remaining vacant Prospect Plaza buildings containing 240 apartments.

The balance of the Prospect Plaza project (the "Prospect Plaza Sites") is a mixed-finance and mixed-income development comprised of rental units and public housing units owned and managed by a private third-party development and management entity. The development includes 80 public housing units and approximately 314 affordable rental units. The non-public housing units will be affordable



to households making up to 60% AMI. In addition, the project will include a supermarket, community center, and a recreation space. The design of the project was based on input from former Prospect Plaza residents and other community stakeholders during a three-day design workshop (“*Re-Vision Prospect Plaza*”) held by NYCHA in June 2010. In December 2011, NYCHA and the New York City Department of Housing Preservation and Development (“HPD”) released a Request for Proposals (“RFP”) for development. Responses to the RFP were submitted in April 2012. A development team was selected in January 2013. A demolition contractor was procured by HPD and demolition work commenced in May 2013 and ended in Spring 2014. Construction of Phase I (110 units including 38 public housing units) started in July 2014 and is now complete. Construction of Phase II (149 units including 42 public housing units) started in March 2015 and is now complete. Closing of construction financing for Phase III took place in March 2016 and the project is currently under construction. This phase will include 135 units, a supermarket, and a community facility.

Relocated Prospect Plaza residents in good standing who wish to return to the redeveloped community will be given a preference during the lease up of the public housing apartments. A site-based waiting list created by NYCHA will be used to place tenants in the public housing units.

### ***Mixed Finance Development***

**Phillip Randolph Houses, Manhattan** – A Request for Proposals (“RFP”) was issued on August 22, 2011, which called for the redevelopment of Randolph Houses in two phases: (i) Phase One as a mixed-finance transaction whereby the south side lots would be ground leased and the south side buildings conveyed to a private developer for gut rehabilitation with the creation of at least 140 public housing units and (ii) Phase Two as the conveyance of the north side properties for the redevelopment of mixed income housing.

The design yields a total of approximately 283 dwelling units of which 147 will be public housing. The New York State Historical Preservation Office (SHPO) approved this renovation plan in January 2011. Construction began on Phase I of II in March 2014. Phase I construction was completed in April 2016 for Buildings A and B respectively and public housing residents have moved in. Phase II closed on construction financing in 2016 and was completed in 2018.

Yes  No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?

If yes, list developments or activities below:

### ***NextGen Neighborhoods Affordable and Market-Rate Housing Initiatives***

**Holmes Towers, Manhattan** – NYCHA intends to lease a parcel of approximately 15,000 square feet on Block 1573, Lot 20 with approximately 310,000 square feet of development rights for market rate and affordable housing development as part of the NextGen Neighborhoods Program. NYCHA in collaboration with HPD issued an RFP in Spring 2016 and a developer was designated in Spring 2017. A Section 18 Application will be submitted in 2018 and construction is scheduled to begin in 2019.

**Wyckoff Gardens, Brooklyn** – NYCHA intends to lease two (2) parcels of approximately 31,000 and 25,000 square feet respectively, both on Block 394, Lot 1, with approximately 500,000 square feet of total development rights for market rate and affordable housing development as part of the

NextGen Neighborhoods Program. NYCHA in collaboration with HPD issued an RFP in Spring 2016 and a developer was designated in late 2017. A Section 18 Application will be submitted in 2019 and construction is scheduled to begin in 2019 or 2020.

**La Guardia, Manhattan** – NYCHA intends to lease a parcel of approximately 18,000 square feet on Block 256, Lot 1 with approximately 350,000 square feet of residential development rights for market rate and affordable housing development as part of the NextGen Neighborhoods Program. NYCHA in collaboration with HPD issued an RFP in 2018.

**Cooper Park, Brooklyn** – NYCHA intends to lease a parcel of approximately 36,000 square feet on Block 2867, Lot 1 with approximately 185,000 square feet of residential development rights for market rate and affordable housing development as part of the NextGen Neighborhoods Program. NYCHA in collaboration with HPD will issue an RFP in 2019.

### ***NextGen 100% Affordable and Seniors First Housing Initiatives***

**Mill Brook, Bronx** – In 2017, NYCHA leased a parcel (Block 2548 Lot 2) with approximately 126,055 square feet of development rights for the construction of a 159-unit senior housing development. Construction began in 2017 and is expected to be completed in 2019.

**Ingersoll, Brooklyn** – In 2017, NYCHA leased a parcel (a portion of Block 2034 Lot 134) with approximately 124,000 square feet of development rights for the construction of a 146-unit senior housing development. Construction began in 2017 and is expected to be completed in 2019.

**Van Dyke I, Brooklyn** – NYCHA intends to lease a parcel of approximately 36,000 square feet on Block 3777, Lot 1, with approximately 191,500 square feet of residential development rights for construction of a 180-unit family housing development. NYCHA in collaboration with HPD issued a RFP in 2015 and a developer was designated in 2016. A Section 18 Application was submitted in 2017. A new developer was designated in late 2017 and construction is expected to begin in 2019.

**Betances V, Bronx** – NYCHA intends to lease a parcel of approximately 12,600 square feet on Block 2287, Lot 26, for construction of a 149-unit senior housing development. NYCHA in collaboration with HPD issued an RFP in 2016 and a developer was designated in 2017. A Section 18 Application will be submitted in 2018 and construction is scheduled to begin in 2019.

**Betances VI, Bronx** – NYCHA intends to lease a parcel of approximately 9,800 square feet on Block 2291, Lot 1, for construction of a 101-unit family housing development. NYCHA in collaboration with HPD issued an RFP in 2016 and a developer was designated in 2017. A Section 18 Application will be submitted in 2018. Demolition of the existing one-story commercial structure and construction of the new affordable housing development is scheduled to begin in 2019.

**Morrisania Air Rights, Bronx** – NYCHA intends to lease a parcel of approximately 21,200 square feet on Block 2409, Lot 98, for construction of a family housing development. NYCHA in collaboration with HPD issued an RFP in 2017. A developer designation is anticipated in 2018. A Section 18 Application will be submitted in 2019 and construction is scheduled to begin in 2019 or 2020.

**Sumner, Brooklyn** – NYCHA intends to lease a parcel of approximately 24,200 square feet on Block 1580, Lot 1, for construction of a senior housing development. NYCHA in collaboration with HPD

issued an RFP in 2017. A developer was designated in 2018. A Section 18 Application will be submitted in 2018 and construction is scheduled to begin in 2019.

**Twin Parks West, Bronx** – NYCHA intends to lease a parcel of approximately 16,500 square feet on Block 3143, Lots 234, 236 and 240, for construction of a family housing development. NYCHA in collaboration with HPD issued an RFP in 2017. A developer was designated in 2018. A Section 18 Application will be submitted in 2018 and construction is scheduled to begin in 2019.

**Harborview Terrace, Manhattan** – NYCHA intends to lease a parcel of approximately 29,000 square feet on Block 1084, Lot 9, for construction of a family housing development. NYCHA and HPD selected a developer in September 2007 to construct two buildings with a minimum of 210 units on the Harborview parking lot mid-block on West 56th Street between 10th Avenue and 11th Avenue. The required ULURP land use review procedure was completed in November 2008. Due to changes in the City's affordable housing finance markets, this project had been on hold and was reactivated by NYCHA and HPD through issuance of a new RFP in May 2017 for affordable housing development. A developer designation is anticipated in 2018 or 2019. A Section 18 Application will be submitted in 2019 and construction is scheduled to begin in 2020.

**Baruch Houses, Manhattan** – NYCHA intends to lease a parcel of approximately 6,800 square feet on Block 323, Lot 1 for construction of a senior housing development. NYCHA in collaboration with HPD issued an RFP in 2017. A developer designation is anticipated in 2018.

**Bushwick II CDA (Group E), Brooklyn** – NYCHA intends to lease a parcel of approximately 7,800 square feet on Block 3325, Lot 1 for construction of a senior housing development. NYCHA in collaboration with HPD issued an RFP in 2017. A developer designation is anticipated in 2018.

**Justice Sonya Sotomayor Houses, Bronx** – NYCHA intends to lease a parcel of approximately 9,400 square feet on Block 3730, Lot 1 for construction of a senior housing development. NYCHA in collaboration with HPD issued an RFP in 2017. A developer designation is anticipated in 2018.

### ***Additional Affordable Housing Development Activities***

**Linden Houses and Boulevard Houses, Brooklyn** – In December 2006, NYCHA and HPD together issued an RFP to identify a developer to build 53 two and three-family townhouses for homeownership. In November 2007, a developer was selected to build the townhouses. In addition, NYCHA and HPD invited a non-profit housing sponsor to seek HUD Section 202 funding to develop an 80-unit senior residence with supportive services. The senior housing building closed on construction financing in May 2013 and construction is complete. Due to changing financial conditions, the plan for homeownership units was revised to 240 rental apartments; the disposition application was amended in 2014 to reflect the change. Construction of seven buildings with a total of 240 units were completed in 2017 and was fully tenanted in 2018.

**Robert Fulton, Manhattan** – In December 2006, NYCHA in collaboration with HPD issued a RFP to identify a developer to construct new affordable housing on a parking lot located on West 18th Street (mid-block) between 9th and 10th Avenues. A developer was selected in September 2007. The Fulton project was modified as part of the Chelsea Market Rezoning and the proposed building which is under construction will include 160 units for households with income from 50% AMI to 165% AMI. Construction is expected to be completed in early 2019.

**Soundview, Bronx** – In 2008, NYCHA and HPD conditionally designated a developer to build affordable housing on an under-utilized parking area at Rosedale Avenue and Lacombe Avenue along Soundview Park. The plan included two eight-story buildings with 206 low income rental units for families and seniors and 16 two-family townhouses for homeownership in a multi-phased affordable housing development project. On June 27, 2013, NYCHA disposed of a 68,500 square foot lot for construction of 120 rental units for low-income households (“Phase I”). Phase I was completed in November 2015. On December 19, 2013, NYCHA disposed of a 48,452 square foot lot for construction of 86 units for low-income seniors: eighty-five Section 8 Housing Choice Vouchers were reserved for the new senior residents (“Phase II”). Phase II was completed in June 2016. Phase III consists of construction of 72 for sale cooperative units. Phase III is in pre-development and is expected to close on construction financing in early 2019.

**East 173<sup>rd</sup> Street-Vyse Avenue, Bronx** – NYCHA obtained HUD’s approval to dispose of land along Hoe Avenue that includes a parking lot, basketball court, and grounds to accommodate a proposal from a sponsor for a three-phase, low-income housing project. The proposal will build a total of 224 dwelling units, including 56 senior resident apartments. The project also requires the transfer of up to 60,000 sq. ft. of development rights. Conveyance of each of the three phases’ building sites is pending funding approval by the sponsor. The first parcel of land was conveyed December 21, 2009 to construct an 84-unit apartment building. Conveyance of a second parcel for another 84-unit apartment building took place in 2013. Construction and tenancing are completed for the first and second phases. The conveyance of the parcel for the final phase of the project is delayed pending demolition of an existing church and finalization of a plan to provide ground floor space within the Phase III development for the church.

**East 165<sup>th</sup> Bryant Avenue, Bronx** – NYCHA intends to dispose of a site at 1071 Bryant Avenue, to be merged with an adjacent parcel owned by HPD, for development of low income housing by a non-profit housing sponsor. The project is in development and is expected to close on construction financing in 2018.

**Van Dyke I Houses, Brooklyn** – In 2015, NYCHA conveyed a parcel of land of approximately 11,562 square feet on a portion of Block 3794, Lot 1 at Van Dyke I Houses in Brooklyn for supportive housing development to accommodate homeless and low-income families. The project completed construction in 2017 and was fully tenanted in 2018.

**Astoria, Queens** – NYCHA intends to facilitate the reopening of Astoria Boulevard as a private street for public access through a street easement in conjunction with a mixed-use development in Queens on the waterfront at Halletts Point. The affordable housing project on two parcels will be privately owned and managed. NYCHA residents will have rental preference for 50% of the affordable units. Construction of the first building for affordable housing is scheduled to start in 2019, pending the developer obtaining bond financing or providing to NYCHA a construction completion guaranty.

### ***Other Development Activities***

**Ocean Bay Apartments (Oceanside), Queens** – NYCHA intends to dispose of parcels of land and an existing, vacant, one-story commercial building to facilitate construction of a neighborhood retail space inclusive of a grocery store. The parcels are located on Beach Channel Drive between Beach 53<sup>rd</sup> and Beach 54<sup>th</sup> Streets south of Oceanside Apartments and east of Bayside Apartments. NYCHA acquired the property, a blighted and underused shopping strip, opposite Ocean Bay Apartments consisting of seven contiguous parcels of approximately 37,111 square feet total, as part

of the Ocean Bay HOPE VI Plan through eminent domain. Disposition, demolition of the existing structure, and start of construction is planned for 2018.

**Easements and Transfers of Land for Improved Resiliency** – To enhance coastal resiliency capabilities along vulnerable, low-lying shoreline communities, the New York City Mayor’s Office of Recovery and Resiliency (ORR) has proposed the installation and implementation of various countermeasures. Many of these communities are abutted by NYCHA housing development sites, thereby necessitating easement agreements between NYCHA and ORR. These transactions will be facilitated by the Section 18 Demolition/Disposition process and will ultimately allow for ORR to build preventative measures on NYCHA land to guard against potentially widespread flood damage. Section 18 application submission dates, as well as construction start dates, have not yet been finalized.

**Transfer of Development Rights (“TDR”)** - NYCHA is exploring further potential transactions to transfer development rights (TDRs) in order to raise revenue for the Authority and facilitate the development of additional affordable housing. NYCHA will follow HUD’s direction as to any required process, notifications and engagement with respect to TDRs.

**Ingersoll, Brooklyn** – NYCHA intends to dispose of a parcel of approximately 6,000 square feet (part of Block 2050, Lot 1) along with an additional 90,634 square feet of surplus development rights. The parcel had previously been leased to an adjacent, privately held warehouse which will be demolished for a proposed development. The proposed disposition will generate revenue for NYCHA as well as facilitate the development of new affordable housing units in accordance with the NYC Mandatory Inclusionary Housing (“MIH”) policy. NYCHA intends to submit a Section 18 application in 2018. The proposed transaction is planned for 2018 or 2019.

**Robert Fulton, Manhattan** – NYCHA intends to dispose of approximately 30,000 square feet of surplus development rights for commercial office development through a zoning lot merger. The proposed TDR will generate revenue for NYCHA. NYCHA intends to submit a Section 18 application in 2018. The proposed TDR transaction is planned for 2018 or 2019.

**College Avenue – East 165 Street, Bronx** – NYCHA intends to dispose of approximately 12,000 square feet of surplus development rights through a zoning lot merger. The proposed TDR will facilitate an affordable housing development and generate revenue for NYCHA. NYCHA intends to submit a Section 18 application in 2018. The proposed TDR transaction is planned for 2018 or 2019.

**Howard Houses, Brooklyn** – NYCHA intends to dispose of approximately 15,000 square feet of surplus development rights through a zoning lot merger. The proposed TDR will facilitate an affordable housing development and generate revenue for NYCHA. NYCHA intends to submit a Section 18 application in 2018. The proposed TDR transaction is planned for 2018 or 2019.

## **B) Demolition and/or Disposition**

[24 CFR Part 903.7 (h)]

1.  Yes  No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to component 9; if “yes”, complete one activity description for each development.)

<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>FHA Repossessed Houses – Group V [Formerly Groups II, V, and VI]</b> 1b. Development (project) number: <b>NY005012090</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>NYCHA intends to dispose of six (6) units in three (3) vacant properties comprised of three two-family homes located in Queens. Due to their scattered location and wood frame construction, these properties are costly to operate as public housing and represent an inefficient allocation of housing resources within the Authority.</i> <ul style="list-style-type: none"> <li>• <i>113-44 Springfield Boulevard, Queens Village, NY 11429, Total Units – 2 (One Bedroom = 1 and Two Bedrooms = 1)</i></li> <li>• <i>144-29 105<sup>th</sup> Avenue, Jamaica, NY 11435, Total Units = 2 (3 Three-Bedroom Units)</i></li> <li>• <i>69-33 Bayfield Avenue, Arverne, NY 11692, Total Units = 2 (1 One-Bedroom Unit, 1 Three-Bedroom Unit)</i></li> </ul>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or <b>planned for submission: Spring 2019</b>
5. Number of units affected: 6
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>May 2006</b> b. <b>Projected</b> end date of activity: <b>Summer 2019</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>FHA Repossessed Houses – Group V [Formerly Group IX]</b> 1b. Development (project) number: <b>NY005012090</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>NYCHA intends to dispose of seven (7) units in two (2) vacant properties comprised of a vacant three-family home located at 99 Waverly Avenue, and a vacant four-family home located at 110 Waverly Avenue, both located in Brooklyn. Due to their scattered location and severely deteriorated physical state, including structural instability and fire damage, these properties are costly to operate as public housing and represent an inefficient allocation of housing resources within the Authority.</i> <ul style="list-style-type: none"> <li>• <i>99 Waverly Avenue, Brooklyn, NY 11205, Total Units = 3 (All One-Bedroom Units)</i></li> <li>• <i>110 Waverly Avenue, Brooklyn, NY 11205, Total Units = 4 (All Two-Bedroom Units)</i></li> </ul>
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application <b>approved</b> , submitted, or planned for submission: <b>January 10, 2013</b>

5. Number of units affected: 7  
 6. Coverage of action (select one)  
 Part of the development  
 Total development

7. Timeline for activity:  
 a. **Actual** or projected start date of activity: **May 2006**  
 b. **Projected** end date of activity: **Summer 2019**

**Demolition/Disposition Activity Description**

1a. Development name: **FHA Repossessed Houses – Group V [Formerly Group IX]**  
 1b. Development (project) number: NY005012090

2. Activity type: Demolition   
 Disposition  *NYCHA intends to dispose of four (4) units in two (2) vacant properties comprised of a vacant two-family home located at 349 Berriman Street, and a vacant two-family home located at 140 East 91<sup>st</sup> Street, both located in Brooklyn. Due to their scattered location and wood frame construction, these properties are costly to operate as public housing and represent an inefficient allocation of housing resources within the Authority.*

*349 Berriman Street, Brooklyn, NY 11208, Total Units – 2 (1 Two-Bedroom Unit and 1 Three-Bedroom Unit)*  
*140 East 91<sup>st</sup> Street, Brooklyn, NY 11212, Total Units – 2 (1 One-Bedroom Unit and 1 Two-Bedroom Unit)*

3. Application status (select one)  
 Approved   
 Submitted, pending approval   
 Planned application

4. Date application approved, submitted, or **planned for submission: Spring 2019**

7. Timeline for activity:  
 a. Actual or **projected** start date of activity: **Spring 2017**  
 b. **Projected** end date of activity: **Summer 2019**

**Demolition/Disposition Activity Description**

1a. Development name: **FHA Repossessed Houses – Group V [Formerly Groups I, II, III, IV, V, VI, VII, VIII, IX, X]**  
 1b. Development (project) number: **NY005012090**

2. Activity type: Demolition   
 Disposition  *NYCHA intends to dispose of twenty-one (21) vacant single-family FHA Repossessed Houses. Due to their scattered location and wood frame construction, these properties are costly to operate as public housing and represent an inefficient allocation of housing resources within the Authority.*

<i>Building #</i>	<i>Development</i>	<i>Address</i>	<i>City</i>	<i>Zip Code</i>	<i>DU Size</i>
1	FHA (GROUP IV)	119-12 219 <sup>TH</sup> STREET	CAMBRIA HEIGHTS	11411	3 BR
2	FHA (GROUP III)	144-23 166 <sup>TH</sup> STREET	SPRINGFIELD GARDENS	11434	3 BR
3	FHA (GROUP I)	143-03 105 <sup>TH</sup> AVENUE	JAMAICA	11435	3 BR
4	FHA (GROUP VIII)	106-10 215 <sup>TH</sup> STREET	QUEENS VILLAGE	11429	3 BR
5	FHA (GROUP V)	142-06 FOCH BOULEVARD	SOUTH OZONE PARK	11436	2 BR
6	FHA (GROUP I)	100-40 202 <sup>ND</sup> STREET	HOLLIS	11423	2 BR
7	FHA (GROUP VIII)	220-23 135 <sup>TH</sup> AVENUE	LAURELTON	11413	1 BR
8	FHA (GROUP VII)	111-50 WITTHOFF STREET	QUEENS VILLAGE	11429	3 BR
9	FHA (GROUP I)	114-11 130 <sup>TH</sup> STREET	SOUTH OZONE PARK	11420	3 BR

10	FHA (GROUP I)	114-22 166 <sup>TH</sup> STREET	JAMAICA	11434	3 BR
11	FHA (GROUP VII)	117-11 143 <sup>RD</sup> STREET	JAMAICA	11434	2BR
12	FHA (GROUP II)	126-01 116 <sup>TH</sup> AVENUE	SOUTH OZONE PARK	11420	2 BR
13	FHA (GROUP V)	133-24 135 <sup>TH</sup> PLACE	SOUTH OZONE PARK	11420	2 BR
14	FHA (GROUP I)	202-06 116 <sup>TH</sup> AVENUE	SAINT ALBANS	11412	3 BR
15	FHA (GROUP X)	214-15 HOLLIS AVENUE	QUEENS VILLAGE	11429	4 BR
16	FHA (GROUP X)	231 FERNSIDE PLACE	FAR ROCKAWAY	11691	3 BR
17	FHA (GROUP X)	118-35 153 <sup>RD</sup> STREET	JAMAICA	11434	1 BR
18	FHA (GROUP VII)	146-23 176 <sup>TH</sup> STREET	JAMAICA	11434	3 BR
19	FHA (GROUP VIII)	198-16 116 <sup>TH</sup> AVENUE	JAMAICA	11412	3 BR
20	FHA (GROUP IV)	209-26 NASHVILLE BOULEVARD	JAMAICA	11411	3 BR
21	FHA (GROUP IV)	99-19 194 <sup>TH</sup> STREET	JAMAICA	11423	4 BR

3. Application status (select one)  
 Approved   
 Submitted, pending approval   
 Planned application

4. Date application approved, submitted, or **planned for submission: Spring 2019**

5. Number of units affected: 22

6. Coverage of action (select one)  
 Part of the development  
 Total development

7. Timeline for activity:  
 a. Actual or **projected** start date of activity: **Winter 2016**  
 b. **Projected** end date of activity: **Summer 2019**

**Demolition/Disposition Activity Description**

1a. Development name: **FHA Repossessed Houses – Group V [Formerly Group IX]**  
 1b. Development (project) number: **NY005012090**

2. Activity type: Demolition   
 Disposition  *NYCHA intends to dispose of one (1) vacant four-family FHA Repossessed House. Due to its scattered location and wood frame construction, this property is too costly to operate as public housing and represents an inefficient allocation of housing resources within the Authority.*

- *305 Atkins Avenue, Brooklyn, NY 11208, Total Units – 4 (1 One-Bedroom Unit and 3 Two-Bedroom Units)*

3. Application status (select one)  
 Approved   
 Submitted, pending approval   
 Planned application

4. Date application approved, submitted, or **planned for submission: Spring 2019**

5. Number of units affected: 4

6. Coverage of action (select one)  
 Part of the development  
 Total development

7. Timeline for activity:  
 a. Actual or **projected** start date of activity: **Winter 2016**  
 b. **Projected** end date of activity: **Summer 2019**

**Demolition/Disposition Activity Description**

1a. Development name: **Prospect Plaza**  
 1b. Development (project) number: **NY005002440**



<p>2. Activity type: Demolition <input type="checkbox"/></p> <p>Disposition <input checked="" type="checkbox"/> <i>Disposition of the Prospect Plaza Sites (approximately 197,451 square feet, or 4.5 acres) in three phases. Phase I is a mixed-finance transaction and includes 72 low-income units for households making up to 60% AMI and 38 public housing units. Phase II is a mixed-finance transaction and includes 106 low-income units for households making up to 60% AMI and 42 public housing units. Phase III includes 105 low-income units for households making up to 60% AMI. The three phases will have approximately 364 low-income units total, 80 of which will be public housing units. Preference for the lease up of the public housing apartments is given to relocated Prospect Plaza residents in good standing, who wish to return to the redeveloped community.</i></p>
<p>3. Application status (select one)</p> <p>Approved <input checked="" type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input type="checkbox"/></p>
<p>4. Date application <b>approved</b>, submitted, or planned for submission: <b>January 3, 2014</b></p>
<p>5. Number of units affected: 0</p>
<p>6. Coverage of action (select one)</p> <p><input type="checkbox"/> Part of the development</p> <p><input checked="" type="checkbox"/> Total development</p>
<p>7. Timeline for activity:</p> <p>a. <b>Actual</b> or projected start date of activity: <b>June 2014</b></p> <p>b. <b>Projected</b> end date of activity: <b>2018</b></p>
<p><b>Demolition/Disposition Activity Description</b></p>
<p>1a. Development name: <b>A. Phillip Randolph Houses</b></p> <p>1b. Development (project) number: <b>NY005010300</b></p>
<p>2. Activity type: Demolition <input checked="" type="checkbox"/></p> <p>Disposition <input checked="" type="checkbox"/> <i>A mixed-finance gut rehabilitation of Randolph Houses in two phases. In the first phase, 22 vacant tenements are rehabilitated using historic tax credits to create 147 public housing units and 21 rental units for low-income households on the south side of West 114th Street. In the second phase, 14 tenements on the north side of West 114th Street are rehabilitated to create low-income rental units. The public housing units are offered to residents currently living on the north side of Randolph Houses and to former residents who were moved to other NYCHA developments who wish to return to the rehabilitated development.</i></p>
<p>3. Application status (select one)</p> <p>Approved <input checked="" type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input type="checkbox"/></p>
<p>4. Date application <b>approved</b>, submitted, or planned for submission: <b>December 2013</b></p>
<p>5. Number of units affected: 452</p>
<p>6. Coverage of action (select one)</p> <p><input type="checkbox"/> Part of the development</p> <p><input checked="" type="checkbox"/> Total development</p>
<p>7. Timeline for activity:</p> <p>a. <b>Actual</b> or projected start date of activity: <b>January 2013</b></p> <p>b. <b>Projected</b> end date of activity: <b>2018</b></p>
<p><b>Demolition/Disposition Activity Description</b></p>
<p>1a. Development name: <b>Linden Houses and Boulevard Houses</b></p> <p>1b. Development (project) number: <b>NY005020950 and NY005020460</b></p>
<p>2. Activity type: Demolition <input type="checkbox"/></p>

Disposition  *Development of an 80-unit senior residence with supportive services and a 240-unit low-income family housing project.*

3. Application status (select one)

Approved

Submitted, pending approval

Planned application

4. Date original application **approved**, submitted, or planned for submission: **September 21, 2011 and amended on December 16, 2014.**

5. Number of units affected: 0

6. Coverage of action (select one)

Part of the development

Total development

7. Timeline for activity:

a. **Actual** or projected start date of activity: **2012**

b. **Projected** end date of activity: **2018**

#### **Demolition/Disposition Activity Description**

1a. Development name: **Robert Fulton Houses**

1b. Development (project) number: **NY005001360**

2. Activity type: Demolition

Disposition  *Development of a mixed income building to include 160 units and a ground floor community facility.*

3. Application status (select one)

Approved

Submitted, pending approval

Planned application

4. Date application **approved**, submitted, or planned for submission: **November 2016**

5. Number of units affected: 0

6. Coverage of action (select one)

Part of the development

Total development

7. Timeline for activity:

a. **Actual** or projected start date of activity: **2013**

b. **Projected** end date of activity: **2019**

#### **Demolition/Disposition Activity Description**

1a. Development name: **Soundview Houses**

1b. Development (project) number: **NY005000710**

2. Activity type: Demolition

Disposition  *Development of two eight story buildings with approximately 206 low income rental units for families and seniors in Phases I and II, and development of 72 cooperative units for affordable homeownership in Phase III.*

3. Application status (select one)

Approved

Submitted, pending approval

Planned application

4. Date application **approved**, submitted, or planned for submission: **January 30, 2013**

5. Number of units affected: 0

6. Coverage of action (select one)

Part of the development

<input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2012</b> b. <b>Projected</b> end date of activity: <b>2020</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>East 173<sup>rd</sup> Street-Vyse Avenue Houses</b> 1b. Development (project) number: <b>NY005015300</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Development of a total 224 dwelling units, including 56 senior citizen apartments in three phases: Phase I an 84-unit apartment building, Phase II an 84-unit apartment building, and phase III a 56-unit apartment building, following relocation of an existing community facility.</i>
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application <b>approved</b> , submitted, or planned for submission: <b>November 14, 2009</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>November 21, 2008</b> b. Projected end date of activity: <b>2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>East 165<sup>th</sup> – Bryant Avenue</b> 1b. Development (project) number: <b>NY005015300</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease a 6,000 square foot parcel at 1071 Bryant Avenue, Block 2750, Lot 32, to be merged with an adjacent parcel owned by HPD, for development of low income housing by a non-profit housing sponsor.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application <b>approved</b> , submitted, or <b>planned for submission</b> : <b>2018</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2018</b> b. <b>Projected</b> end date of activity: <b>2020</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Van Dyke I Houses</b> 1b. Development (project) number: <b>NY005000610</b>

<p>2. Activity type: Demolition <input type="checkbox"/></p> <p>Disposition <input checked="" type="checkbox"/> <i>Development of approximately 11,562 square foot parcel on a portion of Block 3794, Lot 1 at Van Dyke I Houses in Brooklyn and approximately 70,000 square feet of development rights for a supportive housing development to accommodate homeless and low-income families.</i></p>
<p>3. Application status (select one)</p> <p>Approved <input checked="" type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input type="checkbox"/></p>
<p>4. Date application <b>approved</b>, submitted, or planned for submission: <b>June 26, 2015</b></p>
<p>5. Number of units affected: 0</p> <p>6. Coverage of action (select one)</p> <p><input checked="" type="checkbox"/> Part of the development</p> <p><input type="checkbox"/> Total development</p>
<p>7. Timeline for activity:</p> <p>a. <b>Actual</b> or projected start date of activity: <b>2012</b></p> <p>b. <b>Projected</b> end date of activity: <b>2018</b></p>
<p><b>Demolition/Disposition Activity Description</b></p>
<p>1a. Development name: <b>Astoria Houses</b></p> <p>1b. Development (project) number: <b>NY005000260</b></p>
<p>2. Activity type: Demolition <input type="checkbox"/></p> <p>Disposition <input checked="" type="checkbox"/> <i>NYCHA intends to facilitate the reopening of Astoria Boulevard as a private street for public access through a street easement in conjunction with a mixed-use development in Queens on the waterfront at Halletts Point. The affordable housing project will be privately owned and managed. NYCHA residents will have rental preference for 50% of the affordable units.</i></p>
<p>3. Application status (select one)</p> <p>Approved <input checked="" type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input type="checkbox"/></p>
<p>4. Date application <b>approved</b>, submitted, or planned for submission: <b>August 28, 2014</b></p>
<p>5. Number of units affected: 0</p> <p>6. Coverage of action (select one)</p> <p><input checked="" type="checkbox"/> Part of the development</p> <p><input type="checkbox"/> Total development</p>
<p>7. Timeline for activity:</p> <p>a. <b>Actual</b> or projected start date of activity: <b>Fall 2016</b></p> <p>b. <b>Projected</b> end date of activity: <b>Fall 2023</b></p>
<p><b>Demolition/Disposition Activity Description</b></p>
<p>1a. Development name: <b>Holmes Towers</b></p> <p>1b. Development (project) number: <b>NY005011390</b></p>
<p>2. Activity type: Demolition <input type="checkbox"/></p> <p>Disposition <input checked="" type="checkbox"/> <i>Lease of an approximate 15,000 square foot parcel on Block 1573, Lot 20 with approximately 310,000 square feet of development rights for market rate and affordable housing development as part of the NextGen Neighborhoods Program.</i></p>
<p>3. Application status (select one)</p> <p>Approved <input type="checkbox"/></p>

Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2016</b> b. Projected end date of activity: <b>2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Wyckoff Gardens</b> 1b. Development (project) number: <b>NY005011630</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of two (2) parcels of approximately 31,000 and 25,000 square feet respectively, both on Block 394, Lot 1, with approximately 500,000 square feet of residential development rights in total for market rate and affordable housing development as part of the NextGen Neighborhoods Program.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2019</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2016</b> b. Projected end date of activity: <b>2022</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>La Guardia Houses</b> 1b. Development (project) number: <b>NY005010760</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of approximately 18,000 square feet on a portion of Block 256, Lot 1, with approximately 340,000 square feet of residential development rights for market rate and affordable housing development as part of the NextGen Neighborhoods Program.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2019</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2017</b> b. Projected end date of activity: <b>2022</b>

<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Cooper Park</b>
1b. Development (project) number: <b>NY005000690</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of approximately 36,000-square foot parcel on a portion of Block 2867, Lot 1, with approximately 185,000 square feet of residential development rights for market rate and affordable housing development as part of the NextGen Neighborhoods Program.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2019</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2017</b> b. Projected end date of activity: <b>2023</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Mill Brook Houses</b>
1b. Development (project) number: <b>NY005010840</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of an approximate 31,735 square foot parcel on Block 2548 Lot 1 with approximately 127,000 square feet of development rights for affordable senior housing development.</i>
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date original application <b>approved</b> , submitted, or planned for submission: <b>June 5, 2017</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or <b>projected</b> start date of activity: <b>2016</b> b. <b>Projected</b> end date of activity: <b>2019</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Ingersoll Houses</b>
1b. Development (project) number: <b>NY005000140</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of an approximate 11,500 square foot parcel on Block 2034 Lot 1 with approximately 112,000 square feet of development rights for affordable senior housing development.</i>
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date original application <b>approved</b> , submitted, or planned for submission: <b>June 5, 2017</b>

5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or <b>projected</b> start date of activity: <b>2017</b> b. <b>Projected</b> end date of activity: <b>2019</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Van Dyke I Houses</b> 1b. Development (project) number: <b>NY005000610</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of an approximate 31,500 square foot parcel on Block 3777 Lot 1 with approximately 191,450 square feet of development rights for affordable housing development.</i>
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date original application <b>approved</b> , submitted, or planned for submission: <b>October 13, 2017</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or <b>projected</b> start date of activity: <b>2016</b> b. <b>Projected</b> end date of activity: <b>2020</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Betances V</b> 1b. Development (project) number: <b>NY005012110</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of a parcel of approximately 12,600 square feet on Block 2287, Lot 26 for the development of affordable senior housing.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or <b>planned for submission</b> : <b>2018</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>July 2009</b> b. <b>Projected</b> end date of activity: <b>2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Betances VI</b> 1b. Development (project) number: <b>NY005012110</b>

2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/> <i>Lease of a parcel of approximately 10,000 square feet on Block 2291, Lot 1 for redevelopment as affordable housing with ground floor commercial. NYCHA intends to lease the site to a developer who will demolish the existing 1-story commercial structure.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: 3 units (commercial use, non-residential)
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2016</b> b. Projected end date of activity: <b>2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Morrisania Air Rights</b> 1b. Development (project) number: <b>NY005012670</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of a parcel of approximately 21,200 square feet on a portion of Block 2409, Lot 98, for development of affordable housing.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: 0 units
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2017</b> b. Projected end date of activity: <b>2022</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Sumner Houses</b> 1b. Development (project) number: <b>NY005010730</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of a parcel of approximately 24,200 square feet on a portion of Block 1580, Lot 1 for development of affordable senior housing.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: 0 units
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development



<input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2017</b> b. Projected end date of activity: <b>2022</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Twin Parks West (Sites 1 &amp; 2)</b> 1b. Development (project) number: <b>NY005012270</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of 3 parcels of approximately 16,500 square feet total on Block 3143, Lots 234, 236, and 240 for development of affordable housing with ground floor commercial.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: 0 units
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2017</b> b. Projected end date of activity: <b>2022</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Harborview Terrace Houses</b> 1b. Development (project) number: <b>NY005010220</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of a parcel of approximately 29,000 square feet on Block 1084, Lot 9 for development of affordable housing.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b> b. <b>Projected</b> end date of activity: <b>2022</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Baruch Houses</b> 1b. Development (project) number: <b>NY005010600</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of a parcel of approximately 6,800 square feet on a portion of Block 323, Lot 1 for development of affordable senior housing.</i>
3. Application status (select one) Approved <input type="checkbox"/>

Submitted, pending approval <input type="checkbox"/>
Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2019</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2017</b> b. Projected end date of activity: <b>2023</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Bushwick II CDA (Group E)</b> 1b. Development (project) number: <b>NY005012470</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of a parcel of approximately 7,800 square feet on a portion of Block 3325, Lot 1 for development of affordable senior housing.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2019</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2017</b> b. Projected end date of activity: <b>2023</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Sotomayor Houses</b> 1b. Development (project) number: <b>NY005010670</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of a parcel of approximately 9,400-square feet on a portion of Block 3730, Lot 1 for development of affordable senior housing.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2019</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2017</b> b. Projected end date of activity: <b>2023</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Ocean Bay Apartments (Oceanside)</b>

1b. Development (project) number: <b>NY005010980</b>
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>In 2003, as part of the Ocean Bay HOPE VI Plan, NYCHA acquired through eminent domain a blighted and underused shopping strip opposite Ocean Bay Apartments, consisting of seven contiguous parcels representing an area of approximately 37,111 SF.</i>  <i>NYCHA needs to demolish the vacant one-story buildings as a result of unsafe conditions. NYCHA also intends to sell the parcels to a developer for the purpose of constructing neighborhood retail space inclusive of a grocery store. The property is located on Beach Channel Drive between Beach 53rd and Beach 54th Streets across the street south of Oceanside Apartments and across the street east of Bayside Apartments.</i>
<i><u>Borough</u>   <u>Block</u>   <u>Lot</u>   <u>Address</u></i>
<i>Queens   15890   54   360 Beach 54th Street (parcel contains a one-story retail space)</i>
<i>Queens   15890   55   366 Beach 54th Street (parcel contains a one-story retail space)</i>
<i>Queens   15890   58   53-15 Beach Channel Drive (vacant lot)</i>
<i>Queens   15890   62   53-13 Beach Channel Drive (vacant lot)</i>
<i>Queens   15890   64   53-05 Beach Channel Drive (parcel contains a one-story retail space)</i>
<i>Queens   15890   66   53-01 Beach Channel Drive (parcel contains a one-story retail space)</i>
<i>Queens   15890   69   N/A Beach 53rd Street (vacant lot)</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2003</b> b. <b>Projected</b> end date of activity: <b>2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Ingersoll Houses</b>
1b. Development (project) number: <b>NY005000140</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Transfer of a 6,000 square foot parcel and approximately 91,000 square feet of surplus development rights to an adjacent housing development site at Tillary Street and Prince Street (Block 2050 Lot 100) which has been rezoned with requirements for affordable housing.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development

7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b> b. <b>Projected</b> end date of activity: <b>2020</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Robert Fulton Houses</b> 1b. Development (project) number: <b>NY005001360</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Transfer of surplus development rights to an adjacent development site for commercial development.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b> b. <b>Projected</b> end date of activity: <b>2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>College Avenue–East 165 Street</b> 1b. Development (project) number: <b>NY005013080</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Transfer of surplus development rights to an adjacent housing development site for affordable housing.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b> b. <b>Projected</b> end date of activity: <b>2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Howard Houses</b> 1b. Development (project) number: <b>NY005000720</b>

2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Transfer of surplus development rights to an adjacent housing development site for affordable housing.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b> b. <b>Projected</b> end date of activity: <b>2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Twin Parks West (Sites 1 &amp; 2)</b> 1b. Development (project) number: NY005012270
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Ground-lease disposition of one residential building with 312 units with the following addresses: 353, 355, 360, and 365 Ford Street, and 355 and 365 East 183<sup>rd</sup> Street, Bronx, NY 10458</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application <input type="checkbox"/>
4. Date original application approved, <b>submitted</b> , or planned for submission: <b>July 6, 2018</b>
5. Number of units affected: <b>312</b>
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or <b>projected</b> start date of activity: <b>2018</b> b. <b>Projected</b> end date of activity: <b>2018</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Betances III, 13</b> 1b. Development (project) number: NY005010840
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Ground-lease disposition of two residential buildings with 22 units with the following addresses: 695 and 699 East 139<sup>th</sup> Street, Bronx, NY 10454</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application <input type="checkbox"/>
4. Date original application approved, <b>submitted</b> , or planned for submission: <b>August 6, 2018</b>
5. Number of units affected: <b>22</b>
6. Coverage of action (select one) <input type="checkbox"/> Part of the development

<input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <b>2018</b> b. Projected end date of activity: <b>2018</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Betances II, 9A</b> 1b. Development (project) number: <b>NY005012110</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Ground-lease disposition of one residential building with 46 units with the following addresses: 505, 509, 511, and 517 East 144<sup>th</sup> Street, Bronx, NY 10454</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application <input type="checkbox"/>
4. Date original application approved, <b>submitted</b> , or planned for submission: <b>August 6, 2018</b>
5. Number of units affected: <b>46</b>
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or <b>projected</b> start date of activity: <b>2018</b> b. <b>Projected</b> end date of activity: <b>2018</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Franklin Avenue II Conventional</b> 1b. Development (project) number: <b>NY005015310</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Ground-lease disposition of three residential buildings with 45 units with the following addresses: 1390, 1392, and 1394 Franklin Avenue, Bronx, NY, 10456</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application <input type="checkbox"/>
4. Date original application approved, <b>submitted</b> , or planned for submission: <b>July 6, 2018</b>
5. Number of units affected: <b>45</b>
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or <b>projected</b> start date of activity: <b>2018</b> b. <b>Projected</b> end date of activity: <b>2018</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Highbridge Rehabs (Nelson Avenue)</b> 1b. Development (project) number: <b>NY005015310</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Ground-lease disposition of three residential buildings with 80 units with the following addresses: 1139, 1144, 1182, and 1184 Nelson Avenue, Bronx, NY 10452</i>
3. Application status (select one) Approved <input type="checkbox"/>

Submitted, pending approval <input checked="" type="checkbox"/>
Planned application <input type="checkbox"/>
4. Date original application approved, <b>submitted</b> , or planned for submission: <b>July 6, 2018</b>
5. Number of units affected: <b>80</b>
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or <b>projected</b> start date of activity: <b>2018</b> b. <b>Projected</b> end date of activity: <b>2018</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Bushwick II (Groups A &amp; C)</b> 1b. Development (project) number: <b>NY005012470</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Ground-lease disposition of 25 residential buildings with 300 units with the following addresses:</i> <ul style="list-style-type: none"> <li>- 75 and 85 Covert Street, Brooklyn, NY 11207</li> <li>- 139, 140 and 190 Harman Street, Brooklyn, NY 11221</li> <li>- 140 and 160 Himrod Street, Brooklyn, NY 11221</li> <li>- 155 Eldert Street, Brooklyn, NY 11207</li> <li>- 250 and 270 Wilson Avenue, Brooklyn, NY 11237</li> <li>- 251, 269, 270, 289, 290, and 310 Central Avenue, Brooklyn, NY 11221, and 580 Central Avenue, Brooklyn, NY 11207</li> <li>- 595, 615, 670, and 690 Evergreen Avenue, Brooklyn, NY 11207</li> <li>- 1229, 1240, 1259, and 1280 Greene Avenue, Brooklyn, NY 11221</li> </ul>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission</b> : <b>2018</b>
5. Number of units affected: <b>300</b>
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or <b>projected</b> start date of activity: <b>2018</b> b. <b>Projected</b> end date of activity: <b>2019</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Bushwick II CDA (Group E)</b> 1b. Development (project) number: <b>NY005012470</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Ground-lease disposition of 5 residential buildings with 276 units with the following addresses:</i> <ul style="list-style-type: none"> <li>- 172 and 176 Menahan Street, and 319, 323, and 327 Wilson Avenue, Brooklyn, NY 11237</li> <li>- 226, 238, and 242 Grove Street, Brooklyn, NY, 11237, and 230 and 234 Grove Street and 339, 343, and 347 Wilson Avenue, Brooklyn, NY 11221</li> <li>- 235, 239, 243, 247, and 251 Linden Street, and 524, 528, and 532 Knickerbocker Avenue, Brooklyn, NY 11221</li> </ul>

<ul style="list-style-type: none"> <li>- 220, 224, 228, 232, and 236 Linden Street, and 357, 361, and 365 Wilson Avenue, Brooklyn, NY 11221</li> <li>- 1389, 1393, 1397, 1411, and 1415 Gates Avenue, and 550, 554, and 558 Knickerbocker Avenue, Brooklyn, NY 11221</li> </ul>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2018</b>
5. Number of units affected: <b>276</b>
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or <b>projected</b> start date of activity: <b>2018</b> b. <b>Projected</b> end date of activity: <b>2019</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Red Hook East</b> 1b. Development (project) number: <b>NY005000040</b>
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/> <i>In response to Hurricane Sandy, and in preparedness for future coastal storms, NYCHA has developed an expansive rehabilitation plan for Red Hook East Houses. As a result, NYCHA intends to demolish building # 28 at 590 Clinton Street with 4 residential units and commercial space at Red Hook East. This demolition will facilitate the construction of critical mechanical, electrical, and plumbing infrastructure that will serve the development. Please note that this demolition meets the de minimis exception to demolition requirements under §970.27 since it is less than 5 residential units and therefore a Section 18 demolition application is not required.</i>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date original application approved, submitted, or <b>planned for submission: 2017</b>
5. Number of units affected: <b>4</b>
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or <b>projected</b> start date of activity: 2017 b. <b>Projected</b> end date of activity: 2018
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Boston Secor</b> 1b. Development (project) number: <b>NY005011380</b>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>NYCHA proposes to convey to the NYC School Construction Authority (“SCA”) a parcel of approximately 51,268 square feet on a portion of Block 5263, Lot 70 at Boston Secor in the Bronx. Under a ground lease with NYCHA since 1969, SCA built a one-story special education annex (P723X) on this parcel. This disposition will facilitate the on-going provision of special education programs and</i>



possible building replacement by SCA in the future. The Boston Secor Annex Site is expected to be acquired by the School Construction Authority by 2020.

3. Application status (select one)  
Approved   
Submitted, pending approval   
Planned application

4. Date application **approved**, submitted, or planned for submission: **May 12, 2011**

5. Number of units affected: 0

6. Coverage of action (select one)  
 Part of the development  
 Total development

7. Timeline for activity:

a. **Actual** or projected start date of activity: **July 2010**

b. **Projected** end date of activity: **2020**

#### Demolition/Disposition Activity Description

1a. Development name: **Betances IV**

1b. Development (project) number: NY005012110

2. Activity type: Demolition

Disposition  *Ground-lease disposition of eight residential buildings with 282 units with the following addresses: 480 East 143rd Street, Bronx, NY 10454; 417, 419, 421, 423, 425, 427, 429, 431, 433, 435, 437, 439, 441, 455, 510, 511, 512, 513, 527, 528, 530, 537, 545, and 547 East 146th Street, Bronx, NY 10455*

3. Application status (select one)

- Approved   
Submitted, pending approval   
Planned application

4. Date application **approved**, **submitted**, or planned for submission: **August 6, 2018**

5. Number of units affected: 282

6. Coverage of action (select one)

- Part of the development  
 Total development

7. Timeline for activity:

a. **Actual** or projected start date of activity: **2018**

b. **Projected** end date of activity: **2018**

## C) Conversion of Public Housing

[24 CFR Part 903.7 (j)]

### 1. Assessments of Reasonable Revitalization Pursuant to section 202 of the HUD FY 1996 HUD Appropriations Act

1.  Yes  No: Have any of the PHA's developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act?

### 2. Conversions pursuant to Section 22 of the U.S. Housing Act of 1937

On September 11, 2008, HUD approved NYCHA's voluntary conversion plan ("VCP") to transition up to 8,400 public housing units to Section 8 assistance at the 21 developments that were previously developed with funding from the City or the State of New York but did not receive the benefit of federal public housing subsidies from HUD (the "City and State Developments") to close a significant gap between the cost of operating the buildings and rent collected. NYCHA has also received permission from HUD to project-base converted Section 8 units after the initial Section 8 tenant vacates.

As of September 7, 2018, there are 4,643 Section 8 conversions in the City and State-built developments (see table below). Subject to voucher and funding availability, NYCHA will continue to designate units and implement the VCP at the City and State Developments in the LLC I portfolio, while seeking a conversion for the units in the LLC II portfolio through the retention action pursuant to 2 CFR Part 200.

AMP Number	Development Name	Total Units	Number of Units to be Converted to Section 8	Number of Units Converted by 9/7/18 (Tenant Based and Project Based/ Occupied and Vacant)
NY005021850	344 EAST 28TH STREET	225	225	71
NY005021870	AMSTERDAM ADDITION	175	26	26
NY005020920	BAY VIEW	1,610	340	340
NY005021260	BAYCHESTER	441	441	395
NY005020460	BOULEVARD	1,441	1,424	433
NY005020860	BUSHWICK	1,220	209	209
NY005020800	CASTLE HILL	2,025	412	404
NY005021340	CHELSEA	425	68	68
NY005021110	DREW HAMILTON	1,217	276	278
NY005021400	INDEPENDENCE TOWERS	744	744	149
NY005020950	LINDEN	1,586	1,586	464

NY005020810	MANHATTANVILLE	1,272	204	204
NY005020490	MARBLE HILL	1,682	258	257
NY005020830	MARLBORO	1,765	372	344
NY005021330	MURPHY	281	281	255
NY005020990	RUTGERS	721	102	102
NY005020930	SAINT MARY'S PARK	1,007	211	209
NY005023770	SAMUEL (CITY)	664	105	105
NY005021140	STAPLETON	693	140	124
NY005021280	WILLIAMS PLAZA	577	577	105
NY005021270	WISE TOWERS	399	399	101
	<b>Total</b>	<b>20,170</b>	<b>8,400</b>	<b>4,643</b>

### 3. PACT Program for Unfunded Units

In July 2017, NYCHA announced that it is expanding PACT to protect the Authority’s unfunded unit portfolio. This portfolio consists of eight (8) conventional public housing developments, also known as the “LLC II developments,” which are listed in the table on the next page and currently receive no dedicated public housing funding. Previously, NYCHA’s PACT program was synonymous with RAD. To make significant repairs, more effectively manage the developments, and strategically deploy NYCHA’s limited financial resources, NYCHA is expanding PACT to create additional public-private partnerships and actively bring the unfunded units into the Authority’s Housing Choice Voucher (Section 8) program.

The LLC II developments were originally built and funded by New York City and New York State subsidies but were never funded directly by HUD. These developments currently “share” in the federal funds provided for NYCHA’s public housing. This costs NYCHA more than \$23 million a year. Additionally, the eight developments require more than \$1 billion in capital repairs, but while they remain unfunded, the buildings continue to deteriorate.

On September 11, 2008, HUD approved NYCHA’s plan to transition the unfunded public housing units to Section 8 assistance. Currently, when a resident vacates their apartment in an LLC II development, the Authority converts the unit to Section 8. Through this process, 1,804 units in the eight developments became part of Section 8 between 2008 and 2018. Through PACT, the remaining 3,890 unfunded units will convert to Section 8. This PACT strategy is an unprecedented financing model to support these apartments, prevent them from falling into complete disrepair, and protect their affordability and residents’ rights.

Shifting the units to the Section 8 Housing Choice Voucher program will bring new, stable revenue to the developments and allow for substantial improvements to be made to the apartments, buildings, and grounds. Additionally, funding previously diverted to these developments from the rest of NYCHA’s portfolio will now go towards the operation and maintenance of NYCHA’s traditional public housing developments.

Under PACT, community engagement and resident conversion began at Baychester and Murphy Houses in the Bronx in August 2017. In September 2017, NYCHA released a Request for Proposals (RFP) to identify development partners to raise financing, perform capital rehabilitation, undertake property management, and, where appropriate, deliver social services at the eight affected developments, starting with the Bronx sites.

On December 3, 2017, HUD approved NYCHA for a retention action pursuant to 2 CFR Part 200 for Baychester and Murphy. HUD had previously approved NYCHA's Significant Amendment to the FY 2017 Annual Plan for the retention action at Baychester and Murphy on November 22, 2017.

As of September 2018, 91% of residents at Baychester and 94% of residents at Murphy have been converted to Section 8 for an overall conversion rate of 92%. In 2018, NYCHA designated the following development partner for this PACT project: MBD Community Housing Corporation, Camber Property Group, LLC, and L&M Development Partners, Inc. Construction is expected to begin in 2019.

NYCHA plans to pursue similar HUD approvals for the remaining six developments in the LLC II portfolio. Through this action, all units in the developments will be operated outside of the federal public housing program and families will be transitioned to Section 8 assistance. Families will be transitioned to Section 8 assistance. Families ineligible for Section 8 assistance will be allowed to remain in place and pay no more than 30% of their income for rent. Completion of the full PACT conversion is expected by 2026.

As part of the Amendment to the FY 2018 Annual Plan, NYCHA requested HUD approval for a retention action pursuant to 2 CFR Part 200 for Independence and Williams Plaza in Brooklyn. NYCHA began community engagement and resident conversion activities at these developments in March 2018.

**The LLC II developments are listed below:**

<b>AMP Number</b>	<b>Development Name</b>	<b>Total Units</b>	<b>Number of Units to be Converted to Section 8</b>	<b>Number of Units Converted by 7/7/18 (Tenant Based and Project Based/ Occupied and Vacant)</b>
NY005021260	BAYCHESTER	441	441	395
NY005021330	MURPHY	281	281	255
NY005021850	344 EAST 28TH STREET	225	225	71
NY005021400	INDEPENDENCE TOWERS	744	744	149
NY005021280	WILLIAMS PLAZA	577	577	105
NY005021270	WISE TOWERS	399	399	101
NY005020460	BOULEVARD	1,441	1,424	433
NY005020950	LINDEN	1,586	1,586	464
	<b>Total</b>	<b>5,694</b>	<b>5,677</b>	<b>1,973</b>

## D) Homeownership

[24 CFR Part 903.7 (k)]

### 1. Public Housing

1.  Yes  No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing PHA** status. PHAs completing streamlined submissions may skip to component 11B.)

<b>Public Housing Homeownership Activity Description (Complete one for each development affected)</b>	
1a. Development name: <b>FHA Repossessed Houses Group V [formerly Groups I through X]</b>	
1b. Development (project) number: <b>NY005012090</b>	
2. Federal Program authority:	
<input type="checkbox"/> HOPE I <input checked="" type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)	
3. Application status: (select one)	
<input checked="" type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program - <i>Section 5(h)</i> Submitted, pending approval <input type="checkbox"/> Planned application	
4. Date Homeownership Plan/Program <b>approved</b> , submitted, or planned for submission: <b>9/11/2014</b>	
5. Number of units affected: 51	
6. Coverage of action: (select one)	
<input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development	
<i>The original Section 5(h) Plan Amendment approved in 2007 included 184 occupied single-family units intended for sale to public housing residents. On September 11, 2014, HUD issued a final Section 5(h) Plan Amendment granting approval for the sale of 51 units to residents under the Section 5(h) Plan and mandating Plan termination after the sale of the 51 units. As of February 2018, 14 homes remain to be sold under the Plan.</i>	

## **E) Project-Based Vouchers (“PBV’s”)**

Consistent with Section 232 of the *FY 2001 VA-HUD Appropriations Act* (PL 106-377), the *Notice* published in 66 Fed. Reg. 3605 (January 16, 2001) and *HUD Notice PIH 2001-4 (HA)* dated January 19, 2001, the New York City Housing Authority (hereafter “NYCHA” or “the Authority”) makes the following statement:

1. As of September 1, 2018, NYCHA has executed 94 HAP contracts for 6,772 project-based units receiving subsidy across the five boroughs in New York City. This includes project-based apartments at NYCHA’s LLC mixed finance developments and a RAD conversion at Ocean Bayside
2. In 2018, NYCHA expects to utilize no more than 18% of the Consolidated Annual Contributions Contract (ACC) for Project Based contracts.
3. NYCHA understands that all new project-based assistance agreements must be for units within census tracts with poverty rates of less than 20%, unless HUD specifically approves an exception. 66 Fed. Reg. 3608.
4. NYCHA will carry out this program in accordance with 42 USC §1437f(o)(13), as amended by §232 of the *FY 2001 VA-HUD Appropriations Act and HUD Notice PIH 2017-21 (HA)*, and in conformity with the non-discrimination requirements specified in 24 CFR §903.7(o). In carrying out this program, the Authority will act affirmatively to further fair housing.
5. The Section 8 Project-Based Program will be consistent with NYCHA’s FY 2019 Annual Plan because:
  - a. Project-basing in certain locations is needed to assure the availability of affordable housing units for an initial period of 20 years with a renewal option of up to 20 years (maximum 40 years combined).
  - b. Project-basing broadens the scope of NYCHA’s program for applicants and landlords. It allows NYCHA to assist families who would not otherwise be eligible for assistance.
  - c. Consistent with the goals of NYCHA’s Five-Year plan, the Section 8 Project-Based Initiative:
    - i. expands the supply of assisted housing;
    - ii. increases assisted housing choice;
    - iii. ensures equal opportunity, and
    - iv. deconcentrates poverty and expands economic opportunities.
6. NYCHA will create site-based waiting lists for developments selected to receive project-based assistance. Applicants on NYCHA’s housing choice voucher waiting list will have the opportunity to apply for placement on site-based waiting lists. Placement on a site-based waiting list will not affect the applicant’s standing on the tenant-based waiting list.

## F) Rental Assistance Demonstration Program (“RAD”)

### 1. Developments Converted under RAD

The Rental Assistance Demonstration (“RAD”) is a voluntary program administered by the United States Department of Housing and Urban Development (“HUD”). The goals of RAD are to safeguard long-term housing assistance, improve and modernize properties, and stabilize developments by placing them on more solid financial footing by converting the funding stream for such developments from Section 9 to Section 8.

#### RAD at Ocean Bay (Bayside)

In December 2016, NYCHA closed its first PACT/RAD transaction at Ocean Bay (Bayside) in the Rockaways neighborhood of Queens, converting 1,395 apartments in 24 elevator buildings from public housing to Section 8 Project-Based Vouchers (PBV). NYCHA entered into a public-private partnership with MDG Construction + Design (developer), The Wavecrest Management Team (property manager), Catholic Charities of Brooklyn and Queens (social services provider), and Ocean Bay Community Development Corporation (resident outreach and engagement entity). The project is being financed with Superstorm Sandy recovery funds from the Federal Emergency Management Agency (FEMA), along with New York State Housing Finance Agency tax-exempt bonds and equity generated from federal 4% Low Income Housing Tax Credits. The project’s total development cost is \$560 million and overall investment in the project is projected at \$325 million; funds are being directed to extensive capital improvements, including the installation of upgraded heating and security systems, new boilers and roofs, and updated apartment interiors that include new windows, kitchens, and bathrooms. All rehab work is occurring with tenants-in-place; no residents are being relocated or displaced because of the project. RAD repairs will be completed in 2018 and the remaining FEMA work will conclude in June 2019.

### 2. Developments Approved for Conversion

In June 2016, NYCHA submitted RAD applications to the United States Department of Housing and Urban Development (HUD) for 40 developments with approximately 5,200 units. In January 2017, HUD approved NYCHA to convert approximately 1,700 units in the Bronx and Brooklyn.

Below, please find specific information related to the public housing developments approved for conversion.

<b>Name of Public Housing Development:</b> BETANCES II, 13	<b>PIC Development ID:</b> NY005010840	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 51	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> $\$346,326,398 / 169,723 \times 51 = \$104,067$

<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 51</b>	<b>Number of Units Post-Conversion 51</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	5	5	0
One Bedroom	9	9	0
Two Bedroom	27	27	0
Three Bedroom	10	10	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: BETANCES II, 18</b>	<b>PIC Development ID: NY005011450</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 78</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$346,326,398/169,723 x 78 = \$159,162</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 78</b>	<b>Number of Units Post-Conversion 78</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	2	2	0
Two Bedroom	17	17	0
Three Bedroom	39	39	0
Four Bedroom	20	20	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		



<b>Name of Public Housing Development:</b> BETANCES III, 18	<b>PIC Development ID:</b> NY005011450	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 19	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 19 = \$38,770
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 19	<b>Number of Units Post-Conversion</b> 19	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	<b>0</b>
One Bedroom	<b>14</b>	<b>14</b>	<b>0</b>
Two Bedroom	<b>0</b>	<b>0</b>	<b>0</b>
Three Bedroom	<b>4</b>	<b>4</b>	<b>0</b>
Four Bedroom	<b>1</b>	<b>1</b>	<b>0</b>
Five Bedroom	<b>0</b>	<b>0</b>	<b>0</b>
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> BETANCES III, 9A	<b>PIC Development ID:</b> NY005012110	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 26	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 26 = \$53,054
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 26	<b>Number of Units Post-Conversion</b> 26	<b>Change in Number of Units per Bedroom Type and Why (De</b>

			<b>Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>3</b>	<b>3</b>	0
One Bedroom	<b>1</b>	<b>1</b>	0
Two Bedroom	<b>0</b>	<b>0</b>	0
Three Bedroom	<b>11</b>	<b>11</b>	0
Four Bedroom	<b>11</b>	<b>11</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: BETANCES V</b>	<b>PIC Development ID: NY005012110</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 100</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$346,326,398/ 169,723 x 100 = \$204,054</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 100</b>	<b>Number of Units Post-Conversion 100</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>3</b>	<b>3</b>	0
One Bedroom	<b>21</b>	<b>21</b>	0
Two Bedroom	<b>37</b>	<b>37</b>	0
Three Bedroom	<b>17</b>	<b>17</b>	0
Four Bedroom	<b>22</b>	<b>22</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: BETANCES VI</b>	<b>PIC Development ID: NY005012110</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units</b>

			transferring) No
<b>Total Units: 155</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development:</b> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$346,326,398/ 169,723 x 155 = \$316,284
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 155</b>	<b>Number of Units Post-Conversion 155</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>3</b>	<b>3</b>	0
One Bedroom	<b>28</b>	<b>28</b>	0
Two Bedroom	<b>62</b>	<b>62</b>	0
Three Bedroom	<b>61</b>	<b>61</b>	0
Four Bedroom	<b>1</b>	<b>1</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: FRANKLIN AVENUE I CONVENTIONAL</b>	<b>PIC Development ID:</b> NY005015310	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 61</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development:</b> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$346,326,398/ 169,723 x 61 = \$124,473
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 61</b>	<b>Number of Units Post-Conversion 61</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit</b>

			<b>Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>15</b>	<b>15</b>	0
Two Bedroom	<b>38</b>	<b>38</b>	0
Three Bedroom	<b>8</b>	<b>8</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> FRANKLIN AVENUE III CONVENTIONAL	<b>PIC Development ID:</b> NY005015310	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 15	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 15 = \$30,608
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 15	<b>Number of Units Post-Conversion</b> 15	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>2</b>	<b>2</b>	0
Two Bedroom	<b>13</b>	<b>13</b>	0
Three Bedroom	<b>0</b>	<b>0</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> HIGHBRIDGE REHABS (ANDERSON AVENUE)	<b>PIC Development ID:</b> NY005015310	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No

<b>Total Units:</b> 135	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development:</b> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$346,326,398/169,723 x 135 = \$275,473
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 135	<b>Number of Units Post-Conversion</b> 135	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>14</b>	<b>14</b>	0
Two Bedroom	<b>74</b>	<b>74</b>	0
Three Bedroom	<b>47</b>	<b>47</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> PALMETTO GARDENS	<b>PIC Development ID:</b> NY005012470	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 115	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Senior	<b>Capital Fund allocation of Development:</b> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$346,326,398/ 169,723 x 115 = \$234,662
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 115	<b>Number of Units Post-Conversion</b> 115	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>57</b>	<b>57</b>	0

One Bedroom	58	58	0
Two Bedroom	0	0	0
Three Bedroom	0	0	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

<b>Name of Public Housing Development:</b> BETANCES I	<b>PIC Development ID:</b> NY005012110	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 309	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 115 = \$630,527
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 309	<b>Number of Units Post-Conversion</b> 309	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	28	28	0
One Bedroom	61	61	0
Two Bedroom	113	113	0
Three Bedroom	77	77	0
Four Bedroom	30	30	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> BUSHWICK II (GROUPS B & D)	<b>PIC Development ID:</b> NY005012470	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No

<b>Total Units: 300</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 300 = \$612,162
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 300</b>	<b>Number of Units Post-Conversion 300</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	25	25	0
Two Bedroom	175	175	0
Three Bedroom	75	75	0
Four Bedroom	25	25	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: HOPE GARDENS</b>	<b>PIC Development ID:</b> NY005012470	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 324</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 324 = \$661,135
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 324</b>	<b>Number of Units Post-Conversion 324</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	26	26	0

One Bedroom	131	131	0
Two Bedroom	71	71	0
Three Bedroom	58	58	0
Four Bedroom	38	38	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

### 3. Developments Under Consideration by HUD for Future RAD Conversions

Below, please find specific information related to the Public Housing Developments that are under consideration by HUD for future RAD conversions.

<b>Name of Public Housing Development:</b> ARMSTRONG I	<b>PIC Development ID:</b> NY005012100	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 371	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family/Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family/Senior	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> $\$346,326,398 / 169,723 \times 282 = \$757,040$
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 371	<b>Number of Units Post-Conversion</b> 371	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	61	61	0
One Bedroom	34	34	0
Two Bedroom	144	144	0
Three Bedroom	48	48	0
Four Bedroom	40	40	0
Five Bedroom	44	44	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> ARMSTRONG II	<b>PIC Development ID:</b> NY005012100	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No



<b>Total Units: 248</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 248 = \$506,054
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 248</b>	<b>Number of Units Post-Conversion 248</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>0</b>	<b>0</b>	0
Two Bedroom	<b>146</b>	<b>146</b>	0
Three Bedroom	<b>61</b>	<b>61</b>	0
Four Bedroom	<b>24</b>	<b>24</b>	0
Five Bedroom	<b>17</b>	<b>17</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: BERRY STREET-SOUTH 9TH STREET</b>	<b>PIC Development ID:</b> NY005011310	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 150</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 150 = \$306,081
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 150</b>	<b>Number of Units Post-Conversion 150</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>22</b>	<b>22</b>	0

Two Bedroom	76	76	0
Three Bedroom	46	46	0
Four Bedroom	6	6	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> CLAREMONT REHAB (GROUP 2)	<b>PIC Development ID:</b> NY005013080	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 107	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 107 = \$218,338
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 107	<b>Number of Units Post-Conversion</b> 107	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	48	48	0
Two Bedroom	34	34	0
Three Bedroom	23	23	0
Four Bedroom	2	2	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> CLAREMONT REHAB (GROUP 3)	<b>PIC Development ID:</b> NY005013080	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 115	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units</b>

			<b>in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 115 = \$234,662
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 115</b>	<b>Number of Units Post-Conversion 115</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	39	39	0
Two Bedroom	53	53	0
Three Bedroom	18	18	0
Four Bedroom	2	2	0
Five Bedroom	3	3	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> CLAREMONT REHAB (GROUP 4)	<b>PIC Development ID:</b> NY005013080	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 150	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 150 = \$306,081
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 150</b>	<b>Number of Units Post-Conversion 150</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	47	47	0
Two Bedroom	75	75	0
Three Bedroom	26	26	0
Four Bedroom	2	2	0
Five Bedroom	0	0	0
Six Bedroom	0	0	

(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> CLAREMONT REHAB (GROUP 5)	<b>PIC Development ID:</b> NY005013080	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 135	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 135 = \$275,473
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 135	<b>Number of Units Post-Conversion</b> 135	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	42	42	0
Two Bedroom	73	73	0
Three Bedroom	18	18	0
Four Bedroom	2	2	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> HARRISON AVENUE REHAB (GROUP A)	<b>PIC Development ID:</b> NY005013410	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 34	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 34 = \$69,378

<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 34</b>	<b>Number of Units Post-Conversion 34</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	13	13	0
Two Bedroom	15	15	0
Three Bedroom	6	6	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> HARRISON AVENUE REHAB (GROUP B)	<b>PIC Development ID:</b> NY005013410	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 150	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 150 = \$306,081
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 150</b>	<b>Number of Units Post-Conversion 150</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	48	48	0
Two Bedroom	70	70	0
Three Bedroom	27	27	0
Four Bedroom	5	5	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

<b>Name of Public Housing Development:</b> MANHATTANVILLE REHAB (GROUP 2)	<b>PIC Development ID:</b> NY005010810	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 46	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 46 = \$93,865
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 46	<b>Number of Units Post-Conversion</b> 46	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	<b>0</b>
One Bedroom	<b>30</b>	<b>30</b>	<b>0</b>
Two Bedroom	<b>6</b>	<b>6</b>	<b>0</b>
Three Bedroom	<b>10</b>	<b>10</b>	<b>0</b>
Four Bedroom	<b>0</b>	<b>0</b>	<b>0</b>
Five Bedroom	<b>0</b>	<b>0</b>	<b>0</b>
Six Bedroom	<b>0</b>	<b>0</b>	<b>0</b>
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> MANHATTANVILLE REHAB (GROUP 3)	<b>PIC Development ID:</b> NY005010810	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 51	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 51 = \$104,067
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 51	<b>Number of Units Post-Conversion</b> 51	<b>Change in Number of Units per Bedroom Type and Why (De</b>

			<b>Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>18</b>	<b>18</b>	0
Two Bedroom	<b>25</b>	<b>25</b>	0
Three Bedroom	<b>7</b>	<b>7</b>	0
Four Bedroom	<b>1</b>	<b>1</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> MARCY AVENUE-GREENE AVENUE SITE A	<b>PIC Development ID:</b> NY005013590	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 48	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x48 = \$97,946
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 48	<b>Number of Units Post-Conversion</b> 48	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>10</b>	<b>10</b>	0
Two Bedroom	<b>13</b>	<b>13</b>	0
Three Bedroom	<b>25</b>	<b>25</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> MARCY AVENUE-GREENE AVENUE SITE B	<b>PIC Development ID:</b> NY005013590	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units</b>

			transferring) No
<b>Total Units: 30</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 30 = \$61,216
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 30</b>	<b>Number of Units Post-Conversion 30</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>5</b>	<b>5</b>	0
Two Bedroom	<b>10</b>	<b>10</b>	0
Three Bedroom	<b>15</b>	<b>15</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: REHAB PROGRAM (WISE REHAB)</b>	<b>PIC Development ID:</b> NY005011270	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 40</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 40 = \$81,622
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 40</b>	<b>Number of Units Post-Conversion 40</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit</b>



			<b>Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>21</b>	<b>21</b>	0
Two Bedroom	<b>19</b>	<b>19</b>	0
Three Bedroom	<b>0</b>	<b>0</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: SOUTH BRONX AREA (SITE 402)</b>	<b>PIC Development ID: NY005013420</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 114</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$346,326,398/ 169,723 x 114 = \$232,621</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 114</b>	<b>Number of Units Post-Conversion 114</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>0</b>	<b>0</b>	0
Two Bedroom	<b>36</b>	<b>36</b>	0
Three Bedroom	<b>66</b>	<b>66</b>	0
Four Bedroom	<b>12</b>	<b>12</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: STEBBINS AVENUE-HEWITT PLACE</b>	<b>PIC Development ID: NY005013420</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>

<b>Total Units: 120</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 120 = \$244,865
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 120</b>	<b>Number of Units Post-Conversion 120</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>30</b>	<b>30</b>	0
Two Bedroom	<b>60</b>	<b>60</b>	0
Three Bedroom	<b>30</b>	<b>30</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> UNION AVENUE-EAST 166TH STREET	<b>PIC Development ID:</b> NY005013420	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 120</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 120 = \$244,865
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 120</b>	<b>Number of Units Post-Conversion 120</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0

One Bedroom	27	27	0
Two Bedroom	67	67	0
Three Bedroom	26	26	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> WEEKSVILLE GARDENS	<b>PIC Development ID:</b> NY005010310	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 257	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 257= \$524,419
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 257	<b>Number of Units Post-Conversion</b> 257	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	21	21	0
One Bedroom	32	32	0
Two Bedroom	4	4	0
Three Bedroom	196	196	0
Four Bedroom	4	4	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> WEST FARMS SQUARE CONVENTIONAL	<b>PIC Development ID:</b> NY005015310	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 20	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of</b>

			<b>public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 20 = \$40,811
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 20</b>	<b>Number of Units Post-Conversion 20</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	6	6	0
Two Bedroom	13	13	0
Three Bedroom	1	1	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: WSUR (BROWNSTONES)</b>	<b>PIC Development ID: NY005011270</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 236</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 236 = \$481,567
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 236</b>	<b>Number of Units Post-Conversion 236</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	124	124	0
One Bedroom	31	31	0
Two Bedroom	80	80	0
Three Bedroom	1	1	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	

(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> 572 WARREN STREET	<b>PIC Development ID:</b> NY005011630	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 200	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 200 = \$408,108
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 200	<b>Number of Units Post-Conversion</b> 200	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	54	54	0
One Bedroom	44	44	0
Two Bedroom	50	50	0
Three Bedroom	42	42	0
Four Bedroom	5	5	0
Five Bedroom	5	5	0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> HOE AVENUE-EAST 173 <sup>RD</sup> STREET	<b>PIC Development ID:</b> NY005015300	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 65	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 65 = \$132,635

<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 65</b>	<b>Number of Units Post-Conversion 65</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	5	5	0
One Bedroom	24	24	0
Two Bedroom	24	24	0
Three Bedroom	12	12	0
Four Bedroom			0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> BRYANT AVENUE-EAST 174 <sup>TH</sup> STREET	<b>PIC Development ID:</b> NY005015300	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 72	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 72 = \$146,919
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 72</b>	<b>Number of Units Post-Conversion 72</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	14	14	0
One Bedroom	24	24	0
Two Bedroom	22	22	0
Three Bedroom	12	12	0
Four Bedroom			0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

<b>Name of Public Housing Development:</b> EAST 173 <sup>RD</sup> STREET-VYSE AVENUE	<b>PIC Development ID:</b> NY005015300	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 168	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 168 = \$342,811
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 168	<b>Number of Units Post-Conversion</b> 168	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom	42	42	0
Two Bedroom	82	82	0
Three Bedroom	44	44	0
Four Bedroom			0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> 1010 EAST 178 <sup>TH</sup> STREET	<b>PIC Development ID:</b> NY005011330	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 220	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 220 = \$448,919
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 220	<b>Number of Units Post-Conversion</b> 220	<b>Change in Number of Units per Bedroom Type and Why (De</b>

			<b>Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>20</b>	<b>20</b>	0
One Bedroom	<b>76</b>	<b>76</b>	0
Two Bedroom	<b>40</b>	<b>40</b>	0
Three Bedroom	<b>6</b>	<b>6</b>	0
Four Bedroom	<b>2</b>	<b>2</b>	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: EAST 165<sup>TH</sup> STREET-BRYANT AVENUE</b>	<b>PIC Development ID: NY005015300</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 111</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$346,326,398/ 169,723 x 111 = \$226,500</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 111</b>	<b>Number of Units Post-Conversion 111</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom			0
Two Bedroom	<b>34</b>	<b>34</b>	0
Three Bedroom	<b>65</b>	<b>65</b>	0
Four Bedroom	<b>12</b>	<b>12</b>	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: HUNTS POINT AVENUE REHAB</b>	<b>PIC Development ID: NY005015300</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units</b>



			transferring) No
<b>Total Units: 131</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$346,326,398/ 169,723 x 131 = \$267,311
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 131</b>	<b>Number of Units Post-Conversion 131</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom	20	20	0
Two Bedroom	75	75	0
Three Bedroom	36	36	0
Four Bedroom			0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> LONGFELLOW AVENUE REHAB	<b>PIC Development ID:</b> NY005015300	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 75</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$346,326,398/ 169,723 x 75 = \$153,040
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 75</b>	<b>Number of Units Post-Conversion 75</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit</b>

			<b>Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom			0
Two Bedroom			0
Three Bedroom	75	75	0
Four Bedroom			0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: WEST FARMS ROAD REHAB</b>	<b>PIC Development ID:</b> NY005015300	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 208</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 208 = \$424,432
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 208</b>	<b>Number of Units Post-Conversion 208</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom	92	92	0
Two Bedroom	81	81	0
Three Bedroom	31	31	0
Four Bedroom	4	4	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: 335 EAST 111<sup>TH</sup> STREET</b>	<b>PIC Development ID:</b> NY005010640	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No

<b>Total Units: 66</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 66 = \$134,676
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 66</b>	<b>Number of Units Post-Conversion 66</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	17	17	0
One Bedroom	22	22	0
Two Bedroom	15	15	0
Three Bedroom	6	6	0
Four Bedroom	6	6	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> PARK AVENUE-EAST 122 <sup>ND</sup> , 123 <sup>RD</sup> STREETS	<b>PIC Development ID:</b> NY005012410	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 90</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 90 = \$183,649
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 90</b>	<b>Number of Units Post-Conversion 90</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0

One Bedroom	27	27	0
Two Bedroom	34	34	0
Three Bedroom	17	17	0
Four Bedroom	12	12	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> WASHINGTON HEIGHTS REHAB (GROUPS 1&2)	<b>PIC Development ID:</b> NY005013090	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 216	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 216= \$440,756
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 216	<b>Number of Units Post-Conversion</b> 216	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom	96	96	0
Two Bedroom	82	82	0
Three Bedroom	33	33	0
Four Bedroom	5	5	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> WASHINGTON HEIGHTS REHAB PHASE III	<b>PIC Development ID:</b> NY005010030 & NY005013090	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 102	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of</b>

			<b>public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 102 = \$208,135
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 102</b>	<b>Number of Units Post-Conversion 102</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom	26	26	0
Two Bedroom	58	58	0
Three Bedroom	15	15	0
Four Bedroom	3	3	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> WASHINGTON HEIGHTS REHAB PHASE IV (C)	<b>PIC Development ID:</b> NY005013090	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 32</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 32 = \$65,297
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 32</b>	<b>Number of Units Post-Conversion 32</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom	19	19	0
Two Bedroom	10	10	0
Three Bedroom	2	2	0
Four Bedroom	1	1	0
Five Bedroom			0
Six Bedroom			0

(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> WASHINGTON HEIGHTS REHAB PHASE IV (D)	<b>PIC Development ID:</b> NY005013090	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 32	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 32 = \$65,297
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 32	<b>Number of Units Post-Conversion</b> 32	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom	20	20	0
Two Bedroom	6	6	0
Three Bedroom	4	4	0
Four Bedroom	2	2	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> PUBLIC SCHOOL 139 (CONVERSION)	<b>PIC Development ID:</b> NY005011110	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 125	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Senior	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 125 = \$255,067

<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 125</b>	<b>Number of Units Post-Conversion 125</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>14</b>	<b>14</b>	0
One Bedroom	<b>111</b>	<b>111</b>	0
Two Bedroom			0
Three Bedroom			0
Four Bedroom			0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> SAMUEL (MHOP) I	<b>PIC Development ID:</b> NY005013170	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 53	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 53 = \$108,149
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 53</b>	<b>Number of Units Post-Conversion 53</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom	<b>4</b>	<b>4</b>	0
Two Bedroom	<b>48</b>	<b>48</b>	0
Three Bedroom	<b>1</b>	<b>1</b>	0
Four Bedroom			0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

<b>Name of Public Housing Development:</b> SAMUEL (MHOP) II	<b>PIC Development ID:</b> NY005013170	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 10	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 10 = \$20,405
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 10	<b>Number of Units Post-Conversion</b> 10	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom	<b>1</b>	<b>1</b>	0
Two Bedroom	<b>5</b>	<b>5</b>	0
Three Bedroom	<b>4</b>	<b>4</b>	0
Four Bedroom			0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> SAMUEL (MHOP) III	<b>PIC Development ID:</b> NY005013170	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 10	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 10 = \$20,405
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 10	<b>Number of Units Post-Conversion</b> 10	<b>Change in Number of Units per Bedroom Type and Why (De</b>



			<b>Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom	<b>1</b>	<b>1</b>	0
Two Bedroom	<b>9</b>	<b>9</b>	0
Three Bedroom			0
Four Bedroom			0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> 1471 WATSON AVENUE	<b>PIC Development ID:</b> NY005010670	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 96	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 96 = \$195,892
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 96	<b>Number of Units Post-Conversion</b> 96	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>12</b>	<b>12</b>	0
One Bedroom	<b>38</b>	<b>38</b>	0
Two Bedroom	<b>30</b>	<b>30</b>	0
Three Bedroom	<b>16</b>	<b>16</b>	0
Four Bedroom			0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> BOYNTON AVENUE REHAB	<b>PIC Development ID:</b> NY005010320	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units</b>

			transferring) No
<b>Total Units: 82</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$346,326,398/ 169,723 x 82 = \$167,324
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 82</b>	<b>Number of Units Post-Conversion 82</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			0
One Bedroom	<b>25</b>	<b>25</b>	0
Two Bedroom	<b>37</b>	<b>37</b>	0
Three Bedroom	<b>17</b>	<b>17</b>	0
Four Bedroom	<b>3</b>	<b>3</b>	0
Five Bedroom			0
Six Bedroom			0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

### ***RAD Resident Rights, Participation, Waiting List and Grievance Procedures***

*(Please note the residents rights listed below are from HUD Notice PIH-2012-32 (HA) H-2017-03, REV-3, Section 1.6 C and Section 1.6 D (the “Notice”))*

- 1. No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute<sup>1</sup>, at conversion, current households cannot be excluded from occupancy at the Covered Project<sup>2</sup> based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project<sup>3</sup> will be grandfathered for application of

<sup>1</sup> RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Pub. L. No. 112-55, approved November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Pub. L. No. 113-76, approved January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Pub. L. No. 113-235, approved December 6, 2014), and Division L, Title II, Section 237 of the Consolidated Appropriations Act (Pub. L. No. 114-113, enacted December 18, 2015), collectively, the “RAD Statute.”

<sup>2</sup> *Covered Project* - The post-conversion property with assistance converted from one form of rental assistance to another under the Demonstration.

<sup>3</sup> *Converting Project* - The pre-conversion property whose assistance is converting from one form of rental assistance to another under the Demonstration.

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>4</sup> Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to Project Based Voucher (“PBV”) requirements regarding continued occupancy unless explicitly modified in HUD Notice PIH-2012-32 (HA) H-2017-03, REV-3 (the “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. Moving to Work (“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 Project Based Rental Assistance (“PBRA”) units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units 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>5</sup>

**2. Right to Return.** See section 1.4.A.5(ii) of the Notice reference below and the RAD Fair Housing, Civil Rights, and Relocation Notice (as defined below) regarding a resident’s right to return.

- i. RAD Fair Housing, Civil Rights, and Relocation Notice.** Relocation requirements related to public housing conversions under RAD are described in Notice H 2016-17; PIH 2016-17, as may be amended from time to time (“RAD Fair Housing, Civil Rights, and Relocation Notice”).<sup>6</sup> The RAD Fair Housing, Civil Rights, and Relocation Notice provides PHAs and their development partners with information and resources on RAD program requirements and Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) requirements when planning for or implementing resident moves in connection with a RAD conversion under the First Component of RAD. Specifically, the RAD Fair Housing, Civil Rights, and Relocation Notice provides guidance on relocation planning, resident right to return, relocation assistance, resident notification, initiation of relocation, and the fair housing and civil rights requirements applicable to these activities.

The appendices to the RAD Fair Housing, Civil Rights, and Relocation Notice include recommended relocation plan contents. Sample relocation notices for issuance to residents depending on RAD project characteristics are available on the

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<sup>4</sup> These protections (as well as all protections in HUD Notice PIH-2012-32 (HA) H-2017-03, REV-3 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.

<sup>5</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.

<sup>6</sup> “Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions” [http://portal.hud.gov/hudportal/documents/huddoc?id=RAD\\_Notice2.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=RAD_Notice2.pdf). For properties being redeveloped with funding under a Choice Neighborhoods Implementation (CNI) grant, the RAD Fair Housing, Civil Rights, and Relocation Notice is superseded by guidance regarding relocation included in the CNI NOFA.

RAD website at [www.hud.gov/rad](http://www.hud.gov/rad). Questions regarding relocation will generally be addressed in the RAD Fair Housing, Civil Rights, and Relocation Notice and not this Notice. In the event of a conflict between this Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice, with regard to relocation requirements, the RAD Fair Housing, Civil Rights, and Relocation Notice controls.

**ii. Right to Return.** Any resident that may need to be temporarily relocated to facilitate rehabilitation or construction has a right to return to an assisted unit at the Covered Project once rehabilitation or construction is completed. Permanent involuntary displacement of residents may not occur as a result of a project's conversion of assistance, including, but not limited to, as a result of a change in bedroom distribution, a de minimis reduction of units, the reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to facilitate social service delivery. Where the transfer of assistance to a new site is warranted and approved (see Section 1.4.A.12 of the Notice), residents of the Converting Project will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. For more information on how to implement these provisions see the RAD Fair Housing, Civil Rights, and Relocation Notice.

**iii. Ineligibility of Tenant Protection Vouchers.** Conversion of assistance is not an event that triggers the issuance of Tenant Protection Vouchers to residents of public housing projects going through a RAD conversion.<sup>7</sup>

**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.

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<sup>7</sup> This provision does not preclude a PHA from receiving tenant protection vouchers for a property that has also received a Choice Neighborhoods Implementation grant.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the 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>8</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 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

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<sup>8</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 TPP, 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.

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>9</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 .

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 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 of the Notice, 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 :

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<sup>9</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.

- a. A reasonable period of time, but not to exceed 30 days:
    - i. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
    - ii. In the event of any drug-related or violent criminal activity or any felony conviction;
  - b. 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>10</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

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<sup>10</sup> § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed.

1.6.C.4 of the Notice; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 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>11</sup> In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC.

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<sup>11</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.



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.

**12. 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>12</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).

**13. 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.

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<sup>12</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.

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.

#### ***IV - Relocation Plans***

NYCHA is pursuing a preservation plan that will allow for tenant-in-place rehabilitation, which will require no relocation. If a resident must be temporarily relocated due to medical reasons and/or reasonable accommodation, the temporary relocation will be performed at no expense to the resident. The resident may be able to relocate to a vacant unit in the same development, a vacant unit in another NYCHA development or a vacant unit in the selected developer's housing stock. Specific temporary relocation options will be finalized after a development partner is selected for each affected development. NYCHA will submit an Accessibility and Relocation Checklist to HUD with its financing plan as required by PIH Notice 2012-32 (HA), REV-3 and will comply with the relocation requirements under the RAD program as stated in PIH Notice 2016-17-Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions. Please see Attachment O on page 277 for the full text of this PIH Notice.

#### ***V – Site Selection and Neighborhood Standards***

NYCHA's RAD conversions comply with all applicable site selection and neighborhood review standards as required by the Notice.

#### ***VI – Voluntary Compliance Agreement, Consent Order or Consent Decree***

NYCHA certifies that it is currently compliant with all fair housing and civil rights requirements and is under a Voluntary Compliance Agreement and consent decrees. RAD conversion at the NYCHA developments listed on pages 119 – 154 will not have a negative impact on NYCHA's compliance with existing voluntary compliance agreements or consent decrees.

**ATTACHMENT C**  
**CAPITAL IMPROVEMENTS**

**HUD APPROVED NYCHA'S FY 2018 CAPITAL FUND GRANT ON AUGUST  
30, 2018 AND 5-YEAR ACTION PLAN ON JUNE 19, 2018.**

*Members of the public wishing to examine the Supporting Documents may do so, during regular business hours, by contacting NYCHA's central office, located at 250 Broadway, New York, New York, at (212) 306-3701 to schedule an appointment to review the documents.*

## **ATTACHMENT D** **HOUSING NEEDS**

[24 CFR Part 903.7(a)]

### **1. Housing Needs of Families in the Jurisdiction/s Served by the PHA**

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the “Overall” Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being “no impact” and 5 being “severe impact.” Use N/A to indicate that no information is available upon which the PHA can make this assessment.

<b>Housing Needs of Families in the Jurisdiction by Family Type</b>							
Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% of AMI	744,785	5	5	4	1	3	4
Income >30% but <=50% of AMI	423,102	5	5	4	1	3	4
Income >50% but <80% of AMI	498,309	5	5	3	1	3	3
Elderly (62+)	808,016	5	5	4	4	2	3
Families with Disabilities	461,228	5	5	3	4	3	3
<b>Race/Ethnicity</b>							
Hispanic	775,497	5	5	4	1	3	4
Black	679,076	5	5	4	1	3	4
White	1,219,392	5	5	4	1	3	4
Asian	366,196	5	5	4	1	3	4
Other	73,384	5	5	4	1	3	4

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- Consolidated Plan of the Jurisdiction  
Indicate year:
- American Housing Survey data  
Indicate year: **2011-2015** (1 year)  
Other housing market study  
Indicate year:
- Other sources: (list and indicate year of information)

*Data on the Housing Needs of Families in the Jurisdiction by Family Type was compiled by the New York City Department of City Planning.*

## 2. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

State the housing needs of the families on the PHA’s waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

<b>Housing Needs of Families on the PHA’s Waiting Lists – Public Housing (As of 9/14/18)</b>			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/sub jurisdiction:			
	# of Families	% of Total Families	Annual Turnover <sup>13</sup>
Waiting list total	199,495		2.5%
Extremely low income <=30% AMI	154,117	77.3%	
Very low income (>30% but <=50% AMI)	36,073	18.1%	
Low income (>50% but <=80% AMI)	9,304	4.7%	
Income Not Reported	1	0.0%	
Families with children	85,761	43.0%	
Elderly families	36,433	18.3%	
Families with Disabilities <sup>14</sup>	37,030	18.6%	
<b>Race/Ethnicity</b>			
White	13,892	7.0%	
Black	53,852	27.0%	
Hispanic	88,681	44.5%	
Asian	19,304	9.7%	
Native American	846	0.4%	
Native Hawaiian	936	0.5%	
Other	21,984	11.0%	
<b>Characteristics by Bedroom Size</b>			
0 BR	82,282	41.2%	
1BR	36,274	18.2%	
2 BR	61,257	30.7%	
3 BR	15,536	7.8%	
4 BR	4,090	2.1%	
5+ BR	56	0.0%	
Data Not Available	0	0.0%	

<sup>13</sup> Figure represents turnover (move-outs from Public Housing) during FY 2017.

<sup>14</sup> “Disabled” indicates a person, regardless of age, who falls within the definition of “disability” contained in §233 of the Social Security Act.

**Housing Needs of Families on the PHA's Waiting Lists – Public Housing  
(As of 9/14/2018)**

Is the waiting list closed (select one)?  No  Yes

If yes:

**HOW LONG HAS IT BEEN CLOSED (# OF MONTHS)?**

Does the PHA expect to reopen the list in the PHA Plan year?  No  Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?  No  Yes

**Housing Needs of Families on the PHA's Waiting Lists – Section 8  
(As of 9/28/2018)**

Waiting list type: (select one)

- Section 8 tenant-based assistance  
 Public Housing  
 Combined Section 8 and Public Housing  
 Public Housing Site-Based or sub-jurisdictional waiting list (optional)

If used, identify which development/sub-jurisdiction:

	# of Families	% of Total Families	Annual Turnover
Waiting list total <sup>15</sup>	141,801		4.2% (2017)
Extremely low income <=30% AMI	124,611	87.9%	
Very low income (>30% but <=50% AMI)	14,312	10.1%	
Low income (>50% but <=80% AMI)	197	0.1%	
Income Not Reported	2,681	1.9%	
Families with Children	62,135	43.8%	
Elderly Families	45,492	32.1%	
Families with Disabilities <sup>16</sup>	32,685	23.0%	
<b>Race/Ethnicity</b>			
White	18,697	13.2%	
Black	45,609	32.2%	
Hispanic	61,949	43.7%	
Asian	6,894	4.9%	
Native American	458	0.3%	
Native Hawaiian	137	0.1%	
Other	8,057	5.7%	
<b>Characteristics by Bedroom Size</b>			
0 BR	55,293	39.0%	
1 BR	36,361	25.6%	
2 BR	40,155	28.3%	
3 BR	8,501	6.0%	
4+BR	1,257	0.9%	
5+ BR	171	0.1%	
Data Not Available	63	0.1%	

<sup>15</sup> Waiting list total includes both *extremely low-income* (below 30 percent of Area Median Income) and *very low-income* (30 percent to 50 percent of Area Median Income) families.

<sup>16</sup> “Disabled” indicates a person, regardless of age, who falls within the definition of “disability” contained in §233 of the Social Security Act.

## Housing Needs of Families on the PHA's Waiting Lists – Section 8

(As of 9/28/2018)

Is the waiting list closed (select one)?  No  Yes

*NYCHA's Section 8 Waiting List was reopened on February 12, 2007 to applicants for a ninety-day period. It closed on May 14, 2007.*

If yes:

**How long has it been closed (# of months)?** 136 months as of September 28, 2018.

Does the PHA expect to reopen the list in the PHA Plan year?  No  Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed?  No  Yes

### 3. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year, and the Agency's reasons for choosing this strategy.

#### (1) Strategies

Need: Shortage of affordable housing for all eligible populations.

#### **Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:**

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

#### **Strategy 2. Increase the number of affordable housing units by:**

Select all that apply

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed - finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.



Other: (list below)

**Need:** Specific Family Types: Families at or below 30% of median.

**Strategy 1. Target available assistance to families at or below 30% of AMI:**

Select all that apply

Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing

*While NYCHA does not plan to exceed the federal targeting requirements, slightly over 72% of the families admitted to public housing during calendar year 2017 have been households with incomes at or below 30% of area median income.*

Exceed HUD federal targeting requirements for families at or below 30 percent of AMI in tenant-based section 8 assistance

Employ admissions preferences aimed at families with economic hardships

Adopt rent policies to support and encourage work

Other: (list below)

**Need:** Specific Family Types: Families at or below 50% of median.

**Strategy 1. Target available assistance to families at or below 50% of AMI:**

Select all that apply

Employ admissions preferences aimed at families who are working

Adopt rent policies to support and encourage work

Other: (list below)

**Need:** Specific Family Types: The Elderly

**Strategy 1. Target available assistance to the elderly:**

Select all that apply

Seek designation of public housing for the elderly

*On July 21, 2017, HUD approved NYCHA's request for authorization to continue to extend the designation of the elderly-only developments and buildings for an additional two years.*

Apply for special-purpose vouchers targeted to the elderly, should they become available

Other: (list below)

**Objective:** Convert public housing units to vouchers: Maximize Section 8 rentals at the former City/State developments.

**Progress:** As of September 1, 2018, there were 4,643 Section 8 conversions in the 21 former city and state developments.

**Need:** Specific Family Types: Families with Disabilities.

**Strategy 1. Target available assistance to Families with Disabilities:**

Select all that apply

- Seek designation of public housing for families with disabilities
- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- Affirmatively market to local non-profit agencies that assist families with disabilities
- Other: (list below)

**Need:** Specific Family Types: Races or ethnicities with disproportionate housing needs.

**Strategy 1. Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:**

Select if applicable

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- Other: (list below)

**Strategy 2. Conduct activities to affirmatively further fair housing:**

Select all that apply

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations
- Other: (list below)

**(2) Reasons for Selecting Strategies**

Of the factors listed below, select all that influenced the PHA’s selection of the strategies it will pursue:

- Funding constraints
- Staffing constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board
- Results of consultation with advocacy groups
- Other: (list below)

**ATTACHMENT E**  
**ADDITIONAL INFORMATION**

**1. STATEMENT OF PROGRESS IN MEETING MISSION AND GOALS –  
FY2015 to FY2019**

**Goal:** Increase the availability of decent, safe, and affordable housing.

**PHA Goal:** *Expand the supply of assisted housing.*

**Objective:** Apply for additional rental vouchers.

**Progress:** By the end of 2017, the Section 8 program had expended 104% of its HAP budget to cover new and existing rentals. In the expansion of the Section 8 program, NYCHA converted LLC II unfunded units and completed new admissions for private project-based rental units.

**PHA Goal:** *Improve the quality of assisted housing.*

**Objective:** Improve public housing management (PHAS score).

**Progress:** NYCHA will strive to be designated as a high performing PHA under HUD's Public Housing Assessment Program ("PHAS").

**Objective:** Improve Section 8 Management Assessment Program ("SEMAP") scores.

**Progress:** NYCHA continually conducts staff training to improve voucher management. The Leased Housing Department has a quality control program to identify areas for improvement. As a result, cycle times have been reduced for both Housing Quality Standards inspections and recertifications. NYCHA received the High Performer designation based on its SEMAP score for 2015 and 2016.

**Objective:** To use information technology to transform how we conduct our day-to-day business thereby improving service to all NYCHA's internal and external customers and stakeholders.

**Progress:** NYCHA's IT Department continues to make significant service improvements for both our internal and external customers through the implementation of advanced technologies including mobile and self-service technologies. NYCHA continues to be recognized as a technology leader. In 2018, NYCHA was recognized, this time by the Center for Digital Government, which awarded the MyNYCHA mobile and web app with a 2018 Government Experience Award.

In 2018-2019, the Authority will continue to leverage its investments in advanced technologies in support of the NextGeneration NYCHA business vision, and to assist in reducing central office costs. The following are the major initiatives that the Authority will undertake in 2018 and 2019 in the area of information technology that improve service to our customers and stakeholders:

*Operate as an efficient and effective landlord*

**New Computers**

In 2018, IT completed the installation close to 5,700 new computers with Windows 10 and Microsoft Office 365 for all Development and Central Office desktop users. In addition, 215 VoIP phones were deployed at Borough Offices and close to 9,600 Outlook mailboxes were migrated to the cloud. Additional Office 365 applications – Skype for Business and OneDrive – will also be deployed in 2019. These updated tools will better equip our “frontline” staff to serve their customers.

### **Smart Screens**

Beginning in Q1 2019, IT will install 55-inch interactive Smart Screens at each of the Authority’s developments. The devices are designed to support training, communication and collaboration for staff at the developments, thereby enabling them to have the skills and knowledge to better serve their customers.

### ***Self Service Initiatives***

#### **MyNYCHA App**

The MyNYCHA app, which was first deployed in 2015, saw new enhancements in 2017 to support public space requests and email notifications. Planned 2018 enhancements include:

- Login credentials same as NYCHA Self Service Portal
- View latest Rent Bill
- Report an issue with a recently closed ticket
- Create tickets for complaints
- Push notifications

#### **Public Housing Annual Reviews**

This ongoing project will be completed in 2018 with the full migration of the Annual Review processes to Siebel by implementing the rent calculation and interim re-certification functions in Siebel.

#### **Self Service Portal: Opportunity Connect (Resident Economic Empowerment & Sustainability)**

NYCHA’s Self-Service Portal provides access to Opportunity NYCHA, where residents and other stakeholders can access information on training, financial services, job and business opportunities.

#### **Section 8 Owner App and Web Enhancements**

NYCHA’s Owner Extranet is the online platform for over 35,000 NYCHA Section 8 Owners, who utilize it to submit lease renewals and repair certifications, apply for direct deposit, access tax documents and other functions. In 2018-2019, a re-branded NYCHA Owner Extranet will be deployed with the following new functions:

- Online contract rent change
- Transfers
- Online vacant apartments reporting
- Lead-based paint certification documents
- Inspection failure photos
- Apartment repair certifications
- Post-voucher change notices
- Alerts for upcoming inspections
- Voucher payment suspensions and a suspension view tab

In addition, NYCHA will leverage its successful MyNYCHA app platform to deploy Apple and Android apps for Leased Housing Owners to manage inspections.

## ***Improve Back Office Operations***

### **Tenant Management and Rent Collection System**

Development for the replacement of NYCHA's legacy tenant management and rent collection systems will begin in April 2018 and will continue into 2019 and 2020. This program will replace antiquated NYCHA Project Information Management Systems (PIMS) with new technology that will enable online self-service as well as improved reporting.

### **Electronic Resident Files**

Starting in Q1 2019, the digitizing of existing resident paper folders and files will begin. This will include establish a system to continue storing all future resident files electronically and reduce manual labor associated with hardcopy files.

### **Compliance Management Software.**

In 2018-2019, NYCHA will implement SiteCompli's cloud-based system, which provides a continuous aggregation of regulatory data from City Agencies for NYCHA's properties, and which will interface with NYCHA's Maximo Asset Management system to create or update work orders related to regulatory compliance issues.

### **Maximo Mobile (Hand Helds)**

2018 Goals for Maximo Mobile include adding new or enhancing existing hand held inspections related to critical NYCHA processes, such as lead, asbestos, CCTV, window guard and others. In addition, in 2019, NYCHA will roll out a new Inventory mobile application to help support the new storeroom inventory processes.

### **Maximo System Enhancements**

2018 and 2019 Goals for Core Maximo include enhancements for managing work orders related to lead, mold/mildew, heating, emergency, violations and other NYCHA maintenance tasks. Additional functionality is also planned for Physical Needs Assessment, asset management and improved inventory management. New functions around inventory management are also planned for 2018.

### **Support for Rental Assistance Demonstration Program (RAD) Initiatives**

In 2018 and 2019, IT will continue to support the conversion of NYCHA units through HUD's Rental Assistance Demonstration program (RAD) to the Section 8 platform.

### **Human Resources (HR) Digital Files**

In 2019, NYCHA will integrate departments' local copies of employees' HR folders, which are known as "location folders," with the central office folders to create one comprehensive digital HR file.

### **Legal Case Management System**

In 2018, this project will implement a cloud-based legal case management to replace two systems that do not meet the needs of the Law Department and are no longer supported by their vendors.

### **New Forms Management System**

In 2019, this project will replace NYCHA's no-longer supported forms submission software (Movaris) with Adobe Experience Manager (AEM).

### **Procurement Enhancements**

In 2018-2019, NYCHA will continue to streamline processes, increase transparency and improve services around its internal procurement for materials and services. Future goals for the Procurement initiatives include:

- HD Supply Integration

- Deploy Vendor Evaluation system
- Expand Receipts Dashboard to Support Services and other Central Offices areas
- Decentralize release adjustment process to the field and improve efficiency
- Implement forecasting for Support Services
- Replace offline databases used to track procurements and compliance

### **Resident Broadband Initiatives**

In 2018-2019, NYCHA will collaborate with City Hall and a DoITT mayoral initiative to bridge the digital divide and provide broadband access to NYCHA residents.

### ***Rebuild, expand, and preserve public and affordable housing stock***

#### **eBuilder Implementation (Primavera Replacement)**

This project, ongoing into 2019, will replace the project management software currently used by the Capital Projects Department by migrating functionality to eBuilder, cloud-based solution.

#### **Virtual Hold and Workforce Management**

NYCHA's Customer Contact Center (CCC) is the main point of contact for NYCHA residents, Section 8 (Leased Housing) voucher holders, and the general public. NYCHA's CCC handles approximately 12,000 calls per day with some peak days averaging at 18,000 calls. This 2018 initiative seeks to optimize CCC processes, enhancing the current Calabrio system with Virtual Hold and Workforce Management functions.

**Objective:** To protect NYCHA's information technology investment by maintaining and supporting its technology infrastructure.

**Progress:** Key objectives FY2019-FY2022 technology strategy is to ensure business continuity through a robust and resilient infrastructure program. The projects below are examples of enabling information technology activities that the Authority will deploy in the coming two years in support of this objective:

#### **Expand Bandwidth and Improve Circuits at Management Offices**

Several NYCHA field sites still use DSL or T1 and perform poorly when interacting with NYCHA systems like Microsoft Exchange and Maximo. This project will track action plans to ameliorate performance at those locations by implementing Verizon Ethernet Service (E-LAN) – for improved communications links and faster performance. The increased bandwidth will support video conferencing and online learning. Rollout begins in 2018 and will continue into 2019. Additionally, NYCHA will seek to install improved network circuits at all NYCHA developments.

#### **VoIP Phones for Borough Management and Field Offices.**

In 2017, the update of Borough Management telephones to VoIP was completed. The next phase of this initiative, beginning in 2018 and continuing into 2019, is to upgrade the development offices to VoIP. Field office users will have direct lines for desk phones, voicemail routed to their Outlook inbox, and call forwarding, among other features.

#### **Refresh of Floor Switches**

Technology refresh of aging network switches on all floors at 90 Church St, 250 Broadway, LIC and Borough Management Offices.

#### **Improve Connectivity for NYCHA's Mechanical Systems**

Approximately 60% of NYCHA's buildings have an active fiber network connecting them to their respective management offices. This initiative involves migrating all elevator, energy and CCTV mechanical systems to the existing active fiber to improve connectivity by replacing aging wireless bridges that are prone to malfunction.

### **NYCHA's Cloud-First Strategy**

Since 2014, NYCHA has espoused a "cloud-first" strategy, migrating services and infrastructure to the cloud whenever feasible, based on financial, technical, security, and business criteria. In 2018-2019, NYCHA plans to migrate the following services to cloud-based platforms:

- Kronos Time and Attendance
- eBuilder Construction Management Software

NYCHA will also continue to examine the viability and benefits of migrating other NYCHA infrastructure and application components to cloud providers on a case-by-case basis.

**Objective:** Demolish or dispose of obsolete public housing.

**Progress:** NYCHA continues to review its portfolio to identify properties that are underutilized or obsolete, and that might be brought back into service.

**Objective:** Implement public housing or other homeownership programs.

**Progress:** On September 7, 2007, HPD and NYCHA jointly issued an RFP for approximately 200 new rental units and 18 two-family townhouses at Soundview for homeownership.

In 2008, NYCHA and HPD conditionally designated a developer to build affordable housing on an under-utilized parking area at Rosedale Avenue and Lacombe Avenue along Soundview Park. The plan included two eight-story buildings with approximately 206 low income rental units for families and seniors and 16 two-family townhouses for homeownership in a multi-phased affordable housing development project.

- Phase 1 – On June 27, 2013, NYCHA disposed of a 68,500 square foot lot for construction of 120 rental units for low-income households. Phase 1 was completed in November 2015.
- Phase 2 – On December 19, 2013, NYCHA disposed of a 48,452 square foot lot for construction of 86 units for low-income seniors with rental assistance through Project Based Vouchers. Phase 2 was completed in September 2016.
- Phase 3 – Plans have been prepared for development of 72 for sale co-op apartments in four-story structures instead of 16 two-family townhouses. HPD is working with the developer on financing for the affordable homeownership project.

FHA Repossessed Houses - The original Section 5(h) Plan Amendment approved in 2007 included 184 occupied single-family units intended for sale to their public housing resident occupants. On September 11, 2014, HUD issued a final Section 5(h) Plan Amendment granting approval for the sale of 51 units to residents under the Section 5(h) Plan and mandating Plan termination after the sale of the 51 units. As of February 2018, 14 homes remain to be sold under the Plan.

**Objective:** Renovate or modernize public housing units.

**Progress:** Continued compliance with the timeframes for obligation and expenditure of capital funding as provided under 9(j) of the Housing Act of 1937, as amended 42 USC 1437G(J).

**Objective:** Maintain the accuracy rate of public housing tenant information in HUD’s on-line Public and Indian Housing Information Center (“PIC”) at 95% or better.

**Progress:** NYCHA has instituted weekly reports to guide staff on how to prioritize the outstanding recertifications and are providing additional coaching to Property Management Staff through the PIC Unit (formerly IVU) under the Management Services Department.

**Objective:** Develop and steward an Authority-wide Comprehensive Sustainability Agenda to create healthy and comfortable homes in safe, clean, and connected developments.

**Progress:** In May 2015, NYCHA made the commitment in the NextGeneration NYCHA 10-year strategic plan to develop and steward a comprehensive sustainability agenda to improve the quality of life of our residents. The NextGeneration NYCHA Sustainability Agenda was released on Earth Day 2016.

The Agenda is both a commitment by the Authority to take concrete steps to create healthy, comfortable homes for our residents that will withstand the challenge of climate change, and an invitation to residents, housing and environmental advocates, community-based organizations, and sister agencies to partner with NYCHA toward a shared, long-term vision of equity, sustainability, and resiliency.

By 2025 NYCHA aims to achieve the following outcomes:

- Eliminate the **root causes of mold** by fixing leaks in roofs, façades, and pipes and modernizing ventilation systems;
- Eliminate **overheating and unplanned heat and hot water outages**;
- Put its buildings on the path to meeting the City’s goal of **reducing greenhouse gases** by 80% by 2050;
- Address **climate adaptation and resiliency** in all capital planning; and
- Incorporate **sustainability into day-to-day management** of all properties.

Highlights of key initiatives:

Energy Performance Contracting (EPC) Program: The EPC program benefits NYCHA residents by investing in capital upgrades that help provide consistent and comfortable heat and hot water, and brighter, energy-efficient lighting. The EPC program allows NYCHA to use future energy cost savings to pay for these capital improvements. Since announcing the intent to pursue large-scale EPCs in April 2015, NYCHA has submitted four EPCs totaling \$272 million which have been approved by HUD and are now under construction. A \$56 million EPC for 16 developments began construction in February 2017. A \$17 million lighting installation in Brooklyn, part of a \$68 million, 23-development EPC (“BQDM EPC”) was completed in May 2017. The \$68 million BQDM EPC construction started in April 2018 and a \$43 million EPC at 18 of the 32 Sandy-impacted sites construction started in July 2018. Finally, on June 27, 2018, HUD approved a \$105 million EPC for 15 developments.



Weatherization Assistance Program: NYCHA’s scattered-site portfolio includes 659 stand-alone buildings and 1-4 family homes housing 45,000 residents. These developments differ from master-planned developments in size, construction type, and building systems. NYCHA is working with the New York State Weatherization Assistance Program (WAP) to deliver energy and water efficiency upgrades for up to 8,000 of the 25,000 scattered site units. Sunset Park Redevelopment Corporation (SPRC), a NY State Weatherization (WAP) agency, completed energy efficiency upgrades at Howard Avenue Houses this past March 2017. This was the first time in the 40-year history of WAP that NYCHA buildings have benefitted from the program. SPRC began upgrades at Belmont-Sutter Houses in October 2017. In the 2017-2018 program year NYCHA entered into contracts for 990 units with a total construction value of \$4.7 million. To date for the 2018-2019 program year, NYCHA has entered into Weatherization Assistance Program contracts for 266 apartments with a total construction value of \$1.2 million. An additional 508 units are undergoing audits for the 2018-2019 program year.

Renewable Energy Program: In 2018, NYCHA launched two Community Shared Solar Programs on NYCHA roofs and parking lots: (1) the Commercial Solar targets large-scale solar developers and (2) the ACCESSolar program for small buildings provides opportunities to non-profit, local, and start-up businesses. Both programs aim to provide job training and career-path green jobs to NYCHA residents, and to provide access to low-cost renewable power for low-income New Yorkers. NYCHA released the first Commercial Solar RFP in October of 2017. NYCHA plans to release two more Commercial Solar RFPs by the end of 2018. The ACCESSolar program was launched in April of 2018.

Waste Management: In OneNYC, the City set the ambitious goal of sending zero waste to landfills by 2030. As a first step, NYCHA committed to provide recycling infrastructure for every NYCHA development by the end of 2016, and in the Sustainability Agenda committed to developing a comprehensive waste management plan. NYCHA met the goal of install recycling infrastructure in all NYCHA developments by the end of 2016, and in 2017, NYCHA and its partners conducted recycling education to increase awareness and participation for more than 40,000 residents. Also, in 2017, NYCHA convened an inter-agency advisory group to oversee the development of the comprehensive waste management plan, and NYCHA and DSNY completed a waste characterization study of recycling, bulk waste, and landfill waste. The NextGeneration NYCHA Waste Management plan will be released in 2018.

**PHA Goal:** *Increase assisted housing choices for Section 8 residents and applicants.*

**Objective:** Conduct outreach efforts to potential landlords.

**Progress:** Section 8 landlords can log on to the NYCHA Owner Extranet to manage their Section 8 portfolio and register vacant apartments. Section 8 landlords can also register vacant apartments on GoSection8.com. Prospective Section 8 landlords can visit the NYCHA Section 8 website for general information on the Section 8 program. Landlords also have the option to call the NYCHA Customer Contact Center (“CCC”) at 718-707-7771. Regular updates are made to the Leased Housing Department’s website, which provides information about the program, payment standards, and other general areas of concern specific to landlords.

**Objective:** Convert public housing units to Section 8 assistance. Maximize Section 8 rentals at the former City/State developments.

**Progress:** As of September 7, 2018, there were 4,643 Section 8 conversions in the 21 former city and state developments.

**Goal: Improve community quality of life and economic vitality.**

**PHA Goal: *Provide an improved living environment.***

**Objective:** Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments.

NYCHA is exempt from developing an additional Deconcentration Plan because all of NYCHA's developments are part of an explicit strategy to promote income mixing in each of its developments. This strategy is detailed in NYCHA's Tenant Selection and Assignment Plan, and therefore, NYCHA already has a deconcentration plan built into its rental scheme.

Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:

*See Attachment F*

**Goal: Reduce crime and improve quality of life of residents.**

**PHA Goal: *To reduce crime and improve the quality of life of our residents.***

**Objective:** NYCHA will seek funding in order to install additional **Closed-Circuit** Television ("CCTV") cameras within its developments. Small Scale Programs were initiated in 2004.

**Progress:** The Housing Authority has installed 15 large scale CCTV systems citywide. A benefit of remotely monitoring these developments is an improved police response time. Posted signs informing residents and guests that the property is under video surveillance continue to aid in the reduction of crime and enhancing the safety and security of our residents. While the program has been very successful, funding is costly for initial equipment costs and for equipment maintenance after installation. At the initial 15 locations where NYCHA installed large scale CCTV systems the New York City Police Department provides on-site monitoring which incurs considerable costs to the NYPD.

Given the cost of installing, maintaining and operating the initial on-site monitored CCTV Systems, NYCHA modified its original program in an attempt to reduce costs while achieving the benefits of the CCTV program.

Through the innovative use of technology, police resources, and the cooperation of local government, NYCHA has created a highly successful program to install small-scale closed-circuit television systems. Since the inception of NYCHA's CCTV program, 16,131 security surveillance cameras (large and small scale) have been installed citywide.

#### Operation Safe Housing

In June 2004, NYCHA developed a streamlined Termination of Tenancy procedure as part of the Operation Safe Housing joint program developed by NYCHA, the New York City Police Department, and the Mayor's Office of the Criminal Justice Coordinator. The Termination of Tenancy procedure targets a list of specified crimes designated by the Police Department as having the most serious impact on NYCHA residents. The list includes homicides, sex offenders and crimes, firearms offenses and drug sales.

In 2016, crimes previously covered under Operation Safe Housing were reclassified into new categories called “Priority” and “High Priority” and are now expeditiously processed via a Sharepoint database between NYPD and NYCHA. Under these revised procedures, cases involving these serious crimes are completed quickly and contribute to a continued sense of security and safety for public housing residents. As of August 22, 2018, 7,742 of tenancy proceedings have been concluded under Operation Safe Housing and the Priority and High Priority initiatives.

From inception, the Authority initiated a total of 1,104 Registered Sex Offender (“RSO”) cases, of which 53 are pending a decision, and a total of 1,051 have been closed as follows: 672 cases have resulted in Permanent Exclusion from NYCHA property; 64 have had their tenancy terminated; 20 are on probation, 7 tenancies were found eligible after a hearing, 5 were remaining family member grievants who lost their grievance cases and the apartments were recovered, and 283 cases have been withdrawn due to the RSO being incarcerated, deceased or the resident moved out of a NYCHA apartment.

**PHA Goal:** *Increase and diversify services for elderly residents to promote independence and healthy living and reduce social isolation.*

**Progress:** Currently NYCHA operates 14 Senior Centers which provide an array of recreational, social, and cultural services. NYCHA is working towards creating a greater network of providers, who are not exclusively on NYCHA campuses, to increase the range of services available to senior residents.

Also, there are broad initiatives and planning underway from which the seniors will benefit. As examples:

- Choice neighborhoods;
- Smoke-free housing;
- Active design planning collaborations;
- New York Academy of Medicine (“NYAM”) Age-Friendly districts;
- Senior focused Supplemental Nutrition Assistance Program (“SNAP”) outreach; and,
- Department for the Aging’s Grandparents Program offering supports for Grandparents who care for their grandchildren.
- Older Adults Technology Services (OATS)
- Presbyterian Senior Services Circle of Care
- Hudson Guild
- Project Find
- Union Settlement
- Hudson Guild
- Project Find
- Union Settlement

**Naturally Occurring Retirement Communities (“NORC”):** The NORC program provides comprehensive supportive services to residents aging in place. In partnership with the New York City Department for the Aging (“DFTA”), NYS SOFA (“State Office for the Aging”), and United Hospital Fund, NORC sites are operated within 11 NYCHA developments throughout New York City. Examples of services include: case management, on-site nursing services, medication management, physician services, on-site assessment, information and referral services, assistance with Activities of Daily Living (“ADL”), and Instrumental Activities of Daily Living (“IADL”). Additionally, the program provides ancillary services such as: transportation, shopping, financial management, housekeeping, personal care, support groups, and intergenerational activities.

The NORC Program was developed to address the needs of concentrations of seniors who have aged in place, in non-elderly housing. The program was designed to provide comprehensive support and health care services for well and frail elderly residents, 60 years of age and older, who continue to live independently in their apartments and communities. Approximately 20.5% of the NYCHA population is over 60 years old, and not all live-in senior-designated buildings.

Based on DFTA’s reports, from January 1, 2018 to June 30, 2018, the NYCHA NORC program provided the following services:

Case Management & Assistance	-	12,776
Health Care Management & Assistance	-	3,352
Number of residents receiving at least 1 core service	-	3,059
Total Active Clients	-	3,231

In Fiscal Year 2019, DFTA awarded \$2,671,006 to 11 NYCHA NORCS, as follows:

Elliot – Chelsea	-	305,917
Smith Houses	-	282,252
CCNS	-	251,000
Lincoln/Amsterdam	-	316,721
Stanley Isaacs	-	288,654
Ravenswood	-	301,942
Vladeck	-	301,128
Pelham	-	204,894
Grand Street Settlement	-	96,000
Coney Island Active Aging NORC	-	107,594
Bushwick/Hylan NORC	-	214,904

**NORC-type Initiatives:**

**Grand Street Settlement Baruch Elder Services Team (B.E.S.T. Program):** The sponsor is committed to providing age appropriate, culturally sensitive services to senior adults residing in the NYCHA Baruch Houses with the goal of building a strong community of caring in order to foster, support and maximize each members’ overall personal well-being.

The sponsor is also committed to providing comprehensive services that will improve the quality of life for the seniors, enabling them to remain in their homes and helping them to lead independent, healthy and active life-styles within their home community. These services include advocacy, health promotions services, social work services and opportunities for socialization.

- Bilingual Social Services – case assistance, case management, entitlement/benefits assistance, service linkage and coordination, crisis intervention, support services, and advocacy.
- Recreational Services – group activities, trips, bingo, arts & crafts, physical fitness activities, dance and music activities, and light snacks.
- Bilingual Health Services – health education services, health screening, health promotion and prevention, and linkage to appropriate follow-up services.
- Services for Home-Bound Seniors – friendly visits, telephone reassurance calls, and escorts.

Based on B.E.S.T program reports from January 1, 2018 to June 30, 2018 the Grand Street Settlement NORC Program provided the following core services:

	<u>Units of Service</u>
Case management & Assistance	- 245
Health Care Management & Assistance	- 38
Residents receiving Core Services	- 212
Total Active Clients	- 344

**Senior Resident Advisor (SRA):** provides supportive services to elderly (ages 62 and over) and non-elderly disabled residents in select sites. This initiative helps seniors to maintain independent and dignified living by assisting them with accessing public benefits, advocating with service providers on their behalf, and a Senior Volunteer Floor Captain program, through which seniors serve as Floor Captains on their floor and meet monthly to discuss health and safety issues. Floor Captains work through a buddy system to ensure the safety and well-being of each other - especially their frail and disabled neighbors.

From January 1, 2018 through June 30, 2018 the SRA programs provided 6,272 units of supportive service to an average of 436 residents monthly and conducted 2,808 home visits. This program is funded by the Community Development Block Grant (CDBG) from HUD.

**Elderly Safe-At-Home Program:** provides supportive services to residents at 4 NYCHA developments in the South Bronx. The program provides crime prevention education; crisis intervention; assistance with benefits and entitlements; referral for transportation services; meals-on-wheels and homecare; and escort to medical facilities, banks and light emergency shopping. Resident volunteers augment staff support by monitoring the seniors' well-being and engaging and assisting other residents in getting involved in community and program-related activities, thus enhancing their safety and viability. This program is funded by the Community Development Block Grant (CDBG) from HUD.

From January 1, 2018 through June 30, 2018 the Elderly Safe at Home Program provided 1,430 units of supportive services to approximately 153 residents' monthly and conducted 674 home visits.

**Senior Companion Program:** assigns Senior Companions, through a partnership with Henry Street Settlement, to help homebound or isolated fellow seniors live independently. Senior Companions provide friendly home visits, as well as escort and light shopping services, to frail and socially isolated residents at 2 NYCHA developments 1 in Queens and 1 in Staten Island. This initiative is funded by the Corporation for National Service.

From January 1, 2018 through June 30, 2018 the Senior Companion Program conducted 151 home visits and provided 36 Escorts Services to approximately 6 residents monthly.

**PHA Goal:** *Increase collaborative partnerships with public & private agencies to maximize and leverage resources, expand funding base and reduce service duplication.*

**Progress:** NYCHA's Department of Community Engagement & Partnerships along with the Office of Public Private Partnerships has leveraged partnerships with public and private agencies to provide the following program/s:

**I.** In partnership with NYC Service NYCHA announced the launched of 10 new **Youth Leadership Councils** (YLC's) in the Fall of 2016. As part of NextGeneration (NextGen) NYCHA—the Authority's

10-year strategic plan, across neighborhood-based “Zones,” NYCHA convenes local councils providing guidance and input to NYCHA leadership from a youth perspective. The YLCs identify priorities within their development and community and implement local and citywide community service projects throughout the school year. Additionally, youth tackle Policy, Practice, and Service, issues in bi-weekly meetings and strive to create projects that engage the community and champion change with real results and lasting impact.

- **November 2017:** 3rd Annual Senior Thanksgiving Celebration. Gave back and fed Seniors at Reverend Brown Senior Center 1630 St. Marks Avenue, Brooklyn NY)
- **February 2018:** NYCHA held the inaugural Speed Mentoring Event for 60 Youth Leadership Councils (YLC) members. This unique opportunity connected young NYCHA leaders to a group of approximately 60 mentors for a series of short and focused one-on-one conversations aimed at building their networking and public speaking skills. The event aimed to help NYCHA youth explore career options and the variety of paths available to achieve their educational and professional goals.
- **March 2018:** Brooklyn East YLC provide testimony during City Council hearing
- **April 2018:** Brooklyn East YLC Host 1st Youth Health/ Fitness Resource Fair. Focused on combating obesity through active movement: Zumba, Obstacle Course, Double Dutch, Push-ups, Sit-ups, Jumping Jacks Challenge, Table Tennis, Healthy drinks & Instructional Boxing.
- **April 2018:** YLC members assist with the creation of NYCHA's new smoke-free campaign.
  - NYCHA Smoke Free Campaign Video: <https://youtu.be/BHD88SM6qBQ>
- **May 2018:** YLC (Zone 15) Successfully completed job-readiness campaign for 100% of their members
- **May 2018:** Established YLC poster and t-shirt anti violence campaign. Youth partnered with social justice artist Ronny Quevedo to create art that will be distributed to residents throughout the city to raise awareness on safety issues. Youth Council members will host presentations throughout the city to encourage partnerships.
- **June 2018:** Brooklyn East YLC joins Habitat for Humanity New York City “A Brush with Kindness Program” and volunteered to paint and revitalize the Brownsville Senior Center
- **June 2018:** YLC Member Mya Pyle received \$500 scholarship from Medly Pharmacy towards her college studies. Mya will be attending law school in the fall 2018
- **June 2018:** The South Bronx YLC hosted the Second Annual Green Day, a community event held at five NYCHA developments simultaneously to highlight the importance of neighbors working together to make their community cleaner, safer, and more connected.
- **June 2018:** At the 2nd Annual YLC Summit, members participated in a full day of presentations developed during their regular bi-weekly sessions which focus on determining neighborhood priorities and moving them into action. Also, at the Summit, 175 youth were presented with a Mayoral Recognition Certificate (recognition 100 hours of community service).
- **June 2018:** “SBYLC” Video Documentary Premiere of #StandStrongMakeChange at Mott Haven Library
  - <https://youtu.be/LhLHyjBC5w4>
  - <https://youtu.be/Z-LAccNiBRQ>
- **June 2018:** Zone 9 YLC (4 the Rock Youth Leadership Council) Premiere of D.I.M.E /Drugs In My Environment - Short film to promote an anti-drug campaign to help raise awareness about some of the struggles that youth within the community face as it relates to drugs.
  - <https://youtu.be/bvar2Y5oD8U>
- **June 2018:** Established the Katherine Perez Memorial \$1,000 Scholarship - At 17, Katherine (Kathy) Perez was already beacon of hope in the community and a force for positive change. She had a vision to reshape the world’s perception of those who live in the Bronx by creating

community projects that educate and empower youth. Kathy lived at Betances Houses and was an enthusiastic participant in the South Bronx Youth Leadership Council (YLC), through which she helped plan programs to educate the community, strengthen bonds among neighbors, and have fun together.

- <https://www.fundforpublichousing.org/katherineperez/>
- **July 2018:** Higher Sales Community Art Project - youth participated in a paid internship to create art that was used to create new awnings and decor for a local restaurant in the South Bronx.
- **Upcoming event December 2018:** South Bronx YLC will team up with various senior citizens from Betances, Adams, and Saint Mary's Park Houses promote community unity and anti-violence by planting and decorating a unity tree thus reviving a holiday tradition at Betances Houses.

**II. NYCHA, The Fund for Public Housing and CUNY Murphy Institute** launched the **Resident Leadership Academy** to empower the next generation of NYCHA Resident Leaders. Funding has been provided by the New York State Legislature and the New York City council which would allow the institute to provide students with small classes, pro-active counseling, specialized tutoring and an array of academic support. Participating residents will earn up to 16 free college credits through the Murphy Institute/CUNY School of Professional Studies. The Resident Leadership Academy's first course began in January 2018 and ended in May 2018 with 13 resident participants successfully completing the first semester. The second semester is currently underway, and 13 resident participants are continuing with a course focused on community organizing.

**Partnership to Strengthen NYCHA's Commitment to Health:** NYCHA's Department of Health Initiatives advances internal and external collaboration to build health into NYCHA's vision of safe, clean, and connected communities. Established in 2017, Health Initiatives leads and supports partnership strategies that connect residents to preventive health resources, create healthier indoor environments, and cultivate resident leadership in health. A core foundation of NYCHA's Health Initiatives work is cross-systems collaboration with the New York City Department of Health and Mental Hygiene (DOHMH) to connect public housing communities to efforts that drive health equity through programs, policy, and systems change. DOHMH's Center for Health Equity works to eliminate health inequities, which are rooted in historical and contemporary injustices and discrimination, including racism.

**NYCHA Connected Communities:** NYCHA's Connected Communities is a new urban design initiative to activate and improve connections among NYCHA residents and between the NYCHA community and surrounding neighborhoods. The goal of this initiative to decrease the negative effects that disconnection from the surrounding neighborhood might have on the physical and mental health of NYCHA residents. The initial phases of this project have been funded by Duetsche Bank.

**Urban Agriculture:** Farms at NYCHA is part of Building Healthy Communities (BHC), a city-wide partnership designed to improve health outcomes in 12 neighborhoods in New York City. Through NYCHA's partnership with Green City Force, young NYCHA residents are building and maintaining farms on public housing properties across the city to serve fellow residents. There are currently six farm sites in operation. The Farms expand healthy food access, provide youth workforce and leadership development, and promote sustainable and connected public housing communities. In 2017, with four Farms at NYCHA sites active, the initiative distributed approximately 20,000 pounds of free, locally-harvested, organic produce to residents. In the past three years approximately 100 young NYCHA residents age 18-24 have been trained in urban agriculture, sustainability, and community programming.

**Community-Led Playground Design/Build:** In 2017, NYCHA began an initiative called NextGen Plays in partnership with KaBOOM! and the Fund for Public Housing. Through NextGen Plays, NYCHA plans to support the creation of new playgrounds at five developments. This initiative is special because it builds on the strength of NYCHA residents to organize and secure resources for their communities while contributing their vision for children’s play. Communities are selected for this initiative through KaBOOM!’s application process, which requires residents to show community interest and capacity to lead the project. Once a community is selected for a build, the project begins with a KaBOOM!-led Design Day, where NYCHA residents work together to envision their dream playground for their development. Six weeks later, after much planning, 200 volunteers join together to build the new play space in one day. As of Fall 2018, there have been two builds completed. The first build took place at Pomonok Houses in November 2017, and the second build took place in June 2018.

**Ideas Marketplace:** NYCHA’s Office of Sustainability partnered with the Fund for Public Housing and ioby.org to launch the Ideas Marketplace. Its goal is to provide a forum for sustainability initiatives, led by NYCHA residents and community organizations, to gain greater visibility and scale through connection with like-minded efforts across NYCHA communities. The Marketplace was created to enable skill-sharing; joint, multi-year philanthropic support; and greater reach and impact. The first two Marketplace projects were completed in 2017: Ocean Bay Community Gardens, led by the Rockaway Youth Taskforce, and a community discussion event as part of WATERSHED Red Hook, led by Fifth Avenue Committee. So far this year, two projects have been completed: QB Compost Connection! and Door-to-Door Recycling Pilot. Currently, the Mill Brook Gardens Project is underway.

**Food Business Pathways Kiosk Program:** Beginning in October 2018, graduates of the Food Business Pathways program will have the opportunity to participate in a program where they will rotate selling their goods at a kiosk that will be set up in the Brooklyn Navy Yard’s Building 77 food court. This will provide graduates of the Food Business Pathways program with an opportunity to access the market.

**HUD Resident Opportunities and Self Sufficiency – Service Coordinators Program (ROSS):** NYCHA was awarded \$738,000 from HUD’s 2015 Resident Opportunities and Self Sufficiency – Service Coordinators Program (ROSS) grant. This award enables NYCHA’s Resident Economic Empowerment & Sustainability (REES) to continue to employ three Service Coordinators to enhance public housing resident’s economic opportunities by coordinating services, with partner organizations, in the areas of adult education and training, employment, financial literacy and asset building. The ROSS Service Coordinators work with NYCHA residents in Coney Island, East Harlem, and the Lower East Side.

**HUD Family Self Sufficiency (FSS):** Since 2010, NYCHA has annually applied to HUD and been awarded grants for the Family Self Sufficiency (FSS) program. In 2017 NYCHA was awarded a FSS grant of \$208,139 to fund three FSS Coordinators. The FSS grant allows NYCHA’s department of Resident Economic Empowerment & Sustainability (REES) to work with participating residents to increase their earned income by providing opportunities for education, job training, counseling and other forms of social service assistance.

**HUD Jobs Plus:** In 2016, HUD awarded NYCHA a \$2,000,000 Jobs Plus grant to increase the earnings and employment of working-age residents at the Pennsylvania – Wortman Avenue development in Brooklyn. The program began serving residents in 2017 and is working the Center for Economic Opportunity (CEO), the Human Resources Administration (HRA), the Department of Consumer Affairs’ Office of Financial Empowerment (OFE), the Department of Small Business Services (SBS), and the Bedford Stuyvesant Restoration Corporation. The goal of Job Plus is to enroll Penn-Wortman



residents in the program and to provide them with employment services and to increase their economic self-sufficiency.

**New York City Connected Communities (NYCCC):** The New York City Department of Information Technology & Telecommunications (DoITT) has allocated funding to NYCHA, from the New York City Office of Management and Budget (OMB), to support broadband use among resident under the New York City Connected Communities Program (NYCCC). As a partner in Connected Communities, NYCHA has maintained broadband internet technology in 6 Community Centers in public housing developments throughout the five boroughs. These Centers allow NYCHA residents, and other members of the community, to benefit from greater access to Broadband resources, and a variety of internet employment training and job search skills. In addition, NYCHA has operated one (1) Digital Van under the Connected Communities grant. The digital van is a mobile lab which travels developments citywide. The goal is to help residents access technology and bridge the technology gap. Residents can conduct job searches, check email, utilize social media, research, complete recertifications and seek out services. There is a full-time tech support staff member on board to help when required. Van site visits are promoted via social media as well as a monthly schedule which is shared with residents citywide. From August 2017 through June 2018 the NYCC Digital van was accessed by 1765 residents.

**+POOL:** In 2018 [Friends of + POOL](#), the nonprofit that hopes to bring New York City's first water-filtering floating pool to the East River, once again teamed up with the New York City Housing Authority for its Summer Bluefish Swim Program. Thanks to the partnership, 86 kids aged 4 to 14 living in public and low-income housing received free swimming lessons at the Convent of the Sacred Heart Athletic Center in the Upper East Side, Manhattan and CUNY Medgar Evers Pool in Crown Heights, Brooklyn.

While NYC has [swimming pools](#) across the city, there are many families who don't have access to [swimming lessons for kids](#). Classes are part of the non-profit's Summer Bluefish Swim Program, which aims to get kids confident in the water. It is geared on providing underserved youth with the opportunity to learn how to swim for free. Learning how to swim is a crucial step in a child's life. It fosters strong partnerships, it's an invaluable skill and it helps them connect with their community. The Kids are provided with swimsuits, swim cap, goggles, towel, T-shirt, bag and a booklet with lessons.

Friends of + POOL and the NYCHA first launched the program in 2016 and ten kids from the inaugural class have been given the chance to return last summer for advanced classes. Their mission: to someday train these students to become lifeguards at the completed + POOL in East Harlem. In addition to free swim gear participants received tuition scholarships to continue swimming at Sacred Heart Athletic Center.

**City Harvest Mobile Market Program:** City Harvest exists to end hunger in communities throughout New York City. They perform this service through food rescue and distribution, education, and other practical, innovative solutions. City Harvest has been distributing free produce to residents of NYCHA at the Stapleton Houses in Staten Island and Morrisania-Air Rights, Andrew Jackson, and Melrose Houses in the South Bronx, through our Mobile Markets, since 2005. Currently, the Mobile Markets operate at 8 locations throughout the five boroughs. The programs can also be found at Tompkins Houses in Brooklyn, Dyckman Houses in Manhattan, Astoria Houses and Queensbridge Houses in Queens, Mariner's Harbor on Staten Island and at St. Mary's Park in the Bronx. Food distributions take place twice monthly with the help and dedication of community volunteers from NYCHA developments, as well as general City Harvest volunteers. In FY18 City Harvest averaged a distribution rate of 272,805 lbs. of fruit and vegetables to approximately 7,500 participants monthly.

**Book Rich Environments (BRE):** On June 7, 2018, the Family Partnerships Department kicked-off the first of 9 citywide Book Rich Environment (BRE) events! The BRE initiative is a collaboration between non-profit organizations, national government agencies, and corporate publishers designed to encourage reading and improve literacy rates among youth, ages 0 to 18, who reside in HUD-assisted public housing. The National Book Foundation is the BRE project lead, in conjunction with the U.S. Department of Housing and Urban Development, U.S. Department of Education, National Center for Families Learning and the Urban Libraries Council. National book publishers, including Penguin Random House, Hachette Book Group, MacMillan Publishers, Simon & Schuster, HarperCollins, Workman / Algonquin, Candlewick and Scholastic donated 422,000 books to PHAs nationwide for this year's BRE events.

The 2018 BRE events were held at NYCHA community center's during the month of June. These citywide sites included Brooklyn (Farragut, Ingersoll and Carey Gardens), Bronx (Butler and Bronx River), Manhattan: (Gompers and Rutgers), Queens (Pomonok and Hammel Houses), and Staten Island (South Beach Houses). In addition to free book distributions, other BRE activities involved library-card sign-ups, face painting, and story-telling. A total of 75,000 books was distributed to the children and their families.

**Teen Expansion Program (TEP):** The summer of 2018 was a great one! In partnership with the Mayor's Office of Criminal Justice, 25 Community Centers located on NYCHA campuses were selected to offer the Teen Expansion Program. The TEP offers a safe, productive space for youth ages 12-24 in their community throughout the 5 boroughs, in addition to extended hours held at 94 Cornerstone Centers citywide. The program operates 7 days per week, 6:00 p.m. to 11:00 p.m. Monday - Friday, and 3:00 p.m. to 11:00 p.m., Saturday – Sunday for eight weeks starting July 9th, 2018 and ending August 31st, 2018. Each program offered a wide variety of activities such as athletic events, performing arts, field trips, creative workshops, discussion groups and violence prevention and interventions. During the month of July 2018, the Teen Expansion Program 24,507 teens participated in the program. Additional data for August 2018 will be received shortly and NYCHA expects that the participation figures will have increased.

**Objective:** To inform residents about personal disaster preparedness and the private and public resources and programs that can increase their ability to handle emergencies.

**Progress:** NYCHA's Office of Emergency Management (OEM) has participated in and invited partners (NYC Emergency Management- Ready New York & CERT, FDNY, CPC, ASPCA, and ARC) to NYCHA Family Day events and NextGen Resource Fairs, where preparedness material was provided, and residents were engaged on topics regarding emergency preparedness and building personal, family, and community resilience. NYCHA's OEM has partnered with NYS Citizen Preparedness Corps (CPC) to provide on-going emergency preparedness training to NYCHA residents and communities hosted at the DFTA, DYCD and NYCHA managed community and senior centers operating on NYCHA property. NYCHA's OEM has also partnered with NYCHA's Office of Safety and Security and NYC Community Emergency Response Team (CERT) program to provide training and certification to specifically NYCHA's Resident Watch Program members, but also to any NYCHA resident that has an interest in becoming CERT certified members. Part of the partnership is to host the CERT trainings directly on NYCHA properties to ensure a better turn out of NYCHA residents to the trainings. One of the focuses is to train NYCHA's Resident Watch members to become better versed and equipped in preparedness and response to assist NYCHA residents and communities, especially during emergency incidents. NYCHA's OEM has disseminated messaging through various means, digital and in print, that provides situational and incident awareness and informs residents of preparedness actions that should be taken during various emergencies including directing residents to other resources (ARC, NYCEM, Know Your Zone, Notify NYC, 311, etc.) for additional assistance.

Currently, NYCHA's OEM has partnered with NYCHA's Office of Safety and Security to assist with making NYCHA's Resident Watch Program become more robust and better equipped to provide assistance during emergency incidents. NYCHA's OEM is in the process of creating a training program that includes providing them with CERT, CPC, First Aid and CPR trainings. In the future, NYCHA's OEM is planning to partner with American Red Cross to provide CPR training to residents and to partner with FDNY to provide free first aid training to residents.

### **Reducing Exposure to Secondhand Smoke at Home:**

*See Attachment J for NYCHA's Smoke Free Housing Statement.*

### **Goal: Promote self-sufficiency and asset development of families and individuals.**

**Family Self Sufficiency Program:** NYCHA was awarded a 2017 Family Self-Sufficient grant from HUD. The FSS program is managed by NYCHA's Office of Resident Economic Empowerment & Sustainability (REES) and promotes the development of local strategies to coordinate the use of public and private resources to enable participating FSS families to increase earned income and financial literacy and make progress toward economic independence. Participation in the FSS program is voluntary and is open to families throughout the five boroughs who are unemployed or underemployed.

**Objective:** Develop strategic partnerships and leverage external resources to connect residents to high quality economic opportunity services that support resident economic sustainability. (Increase job placements and job training opportunities, apprenticeship and educational enrollments.).

### **Progress:**

#### **A. Strategic Partnerships: REES Zone Partner Networks**

The NYCHA Office of Resident Economic Empowerment & Sustainability (REES) implements programs, policies and collaborations to measurably support residents' increased income and assets with a focus on employment and advancement, financial literacy and asset building, adult education and training, and business development.

By using housing as a platform REES:

1. Connects residents to high quality and relevant economic opportunity services;
2. Supports economic opportunity providers to better serve NYCHA residents;
3. Attracts new resources and proven models to public housing communities; and
4. Generates economic opportunities for NYCHA residents.

REES uses a partnership and place-based service coordination model, or "Zone Model", to identify and partner with high-quality economic opportunity service providers in each key service area. This approach broadens NYCHA's scope from resident job training and employment to a more comprehensive suite of high-quality economic opportunity service providers.

To date, over sixty providers have since entered into formal partnership with REES. In 2017, partnership expansion brought on 25 new partners including adult education and training partners Comprehensive Development Inc., Brooklyn Job Corps, Queens Community House, RiseBoro, York College, CUNY Kingsborough Community College, Lenox Hill Neighborhood Houses, RiseBoro and the Melting Pot Foundation USA, Inc., Stanley Isaacs Neighborhood Center, Sunnyside Community Services, and YMCA of Queens; young adult workforce training partner ECDO, Inc.; Financial Capability and Asset Building partners Neighborhood Housing Services of Brooklyn (2), Queens and

the Bronx; Goddard Riverside, and Westside Campaign against Hunger; and resident Business Development partners Business Outreach Center Network, Inc. and Harlem Business Alliance.

**i. Connecting to Services: Resident Outreach, Recruitment, and Referrals:**

Through the Zone Model, REES has created multiple platforms for performing outreach and connecting residents to services. In 2013, REES launched OpportunityNYCHA.org, a web-based platform designed to connect residents to services and provide timely information on REES and partner programs. Residents utilize the microsite to register for information sessions and connect to programs. Events include twice-weekly information sessions hosted at REES' central office in downtown Brooklyn, in addition to similar sessions hosted offsite at NYCHA developments for a variety of vocational and other training programs, including Section 3 opportunities. REES also distributes a bi-weekly e-newsletter that reaches about 52,000 subscribers. In the past 12 months REES has hosted multiple employment pre-screening events with partners including the NYC Department of Small Business Services' Workforce1 Career Centers, the New York City Police Department and the NYC Fire Department.

**ii. Financial Literacy and Asset Building Highlights:**

**a. Online Financial Counseling E-Referrals**

In November 2015, REES launched Opportunity Connect, an online platform that allows NYCHA residents to refer themselves for economic opportunity services. The first service type to be offered was financial counseling. In October 2016, the services offered under Opportunity Connect expanded to include e-referrals to workforce development, adult education and resident business development partners. From November 2015 to August 2018, there have been 1,723 e-referrals of which 486 are financial counseling e-referrals made to REES economic opportunity partners using this self-service option.

**b. Financial Literacy Training**

**Free Tax Preparation Services in NYCHA Communities**

For the 2018 tax year, Citi Community Development renewed an investment with the Fund for Public Housing to continue the expansion of available of free tax prep services in NYCHA communities. For the 2018 tax season the program has grown to provide free tax preparation services across 28 community centers and Jobs-Plus sites. In the 2018 tax season, more than 1,900 tax returns were filed using the Virtual VITA method at NYCHA locations citywide.

**c. Homebuyer Education for NYCHA Residents**

REES continues to collaborate with homebuyer education partners in 2018 to host several homeownership workshops. REES is also exploring ways to help residents build positive credit history, which is essential in the home buying process, by exploring alternative means of credit. In 2017 in collaboration with REES and Credit Builder's Alliance the Urban Upbound Federal Credit Union and Brooklyn Cooperative Federal Credit Union formally launched their respective rent reporting pilots. In 2017 and continuing in 2018, REES is partnering with additional homebuyer education partners to bring homeownership classes citywide to NYCHA residents. In 2017, REES collaborated with Neighborhood Restore and Habitat for Humanity to host information sessions for affordable homes for sale in Queens. In 2017, 5 NYCHA residents signed contracts to purchase their own single-family homes through Neighborhood Restore and received homeownership rewards through the Fund for Public Housing. In 2018, REES is continuing to host information session for new affordable homes for sale (Bundle 2) with Neighborhood Restore and expanding homeownership education offerings with new HUD-certified home-education counseling partners.

### **iii. Employment and Advancement Highlights**

#### **d. Jobs-Plus**

**Jobs-Plus** is a proven place-based employment program that provides customized employment services, financial counseling, rent-based incentives and peer to peer support to working age residents. A Collaboration between NYCHA, Human Resources Administration (HRA), the Mayor's Office for Economic Opportunity (NYC Opportunity), and the NYC Department of Consumer Affairs (DCA), there are currently ten (10) Jobs-Plus sites operating city-wide under the Jobs-Plus expansion - including 9 funded under the NYC Young Men's Initiative, and NYC's first Jobs-Plus funded under the US Department of Housing and Urban Development's Jobs-Plus Initiative, which opened its doors on April 1, 2017. With the addition of the HUD funded site serving the residents of Pennsylvania - Wortman Avenue Houses, in total the 10 Jobs-Plus sites serve 27 developments and nearly 25,000 working age NYCHA residents. The Jobs-Plus expansion is in alignment with NYCHA's new approach to better support its residents to increase their income and assets by working with public and private partners to identify gaps in service offerings and to develop strategies that attract high quality resources and proven economic opportunity models into public housing neighborhoods. From 9/1/17 to 8/31/18, Jobs Plus achieved 1,454 resident placements collectively.

In September 2016, NYCHA was awarded a \$2 million grant from HUD for the Jobs Plus Initiative Program. HUD's commitment allows NYCHA to bring the Jobs Plus program to Pennsylvania-Wortman Houses located in East New York, Brooklyn. NYCHA celebrated this achievement with a ribbon cutting ceremony held in the fall 2017 and attended by HUD's Regional Administrator in Region II, Brooklyn's Deputy Borough President and NYCHA's Chair and CEO. The HUD Jobs Plus Program completed its first year on 4/1/18 and achieved the following: 139 new members were enrolled-- 124% of the HUD year one goal of 110. 94 (76.4%) of those members were assessed in the areas of job readiness, financial health, and/or mental health-- 106% of the HUD year one goal of 89. 18 members were placed in full-time or part-time employment. We expect to achieve greater success in the area of job placement as we address the barriers to employment with our members. Most promising the potential for gains in financial health--139 members have received financial coaching, including 17 who also received assistance filing taxes and 28 who were referred for the Jobs Plus Earned Income Disallowance program, which will result in substantial rent savings for those who qualify.

#### **e. NYCHA Resident Training Academy (NRTA)**

The NRTA is a public/private initiative funded by the Robin Hood Foundation. The NRTA began in August 2010 as a citywide, employment-linked training program for NYCHA residents. Residents receive training from some of New York City's premier vocational training providers in preparation for jobs with NYCHA, its contractors, and the private sector. Since launching the program, over 2,076 NYCHA residents have completed training through the NRTA with a cumulative 90% completion rate and 90% of graduates going on to careers. For this reporting period, there were two tracks: janitorial and construction. The janitorial track graduated 1,547 residents of which 95% are employed. The construction track has had 348 residents graduate from the training and 75% have secured employment. In August 2015, NYCHA was approved direct entry status for its construction track from the New York State Department of Labor (NYSDOL). Since then, NYCHA has established direct recruitment partnerships with 7 apprenticeship programs including DC 9 Painters, IBEW Local 3 Electricians and Local 8 Roofers for NRTA graduates. In 2017, in partnership with NYC Small Business Services, NYCHA piloted two academic preparation cohorts to prepare NRTA graduates for the competitive IBEW Local 3 Electrician Apprenticeship program. In Winter 2017, NYCHA secured funds through the Fund for Public Housing from an Energy Performance Contract (EPC) employer partner to run a third cohort. A third cohort of the academic prep cohort was executed successfully in August 2018. To

date, 18 NYCHA residents have passed the IBEW Local 3 exam because of the academic prep courses provided. All apprentices are enrolled in SUNY Empire State College and are pursuing an Associate of Science (“AS”) Degree. This is a benefit offered to apprentices and all expenses are covered by the union.

**f. Zone Partner Highlight: Green City Force**

Green City Force (GCF) is a NYC-based AmeriCorps program that combines national service and workforce development to reduce carbon emissions while providing urban young adults with training and leadership opportunities related to greening the economy. Green City Force has partnered with NYCHA’s Office of Resident Economic Empowerment & Sustainability since 2009 to recruit qualified NYCHA Residents ages 18-24 for their full-time stipend-paid program that provides training leading to certifications, college-prep, leadership development and hands-on work experiences. REES continues to work closely with Green City Force on an initiative to recruit young adults for the Clean Energy and Urban Farm Corps. There was intensive recruitment aimed at recruiting young adults from the Mayor’s Action Plan (MAP) developments. Of NYCHA’s developments, there are 15 that fall under MAP and were selected due to high incidences of violent crime. The MAP initiative invests resources into these communities to increase resident access to much needed services and high-quality training programs such as Green City Force. During the reporting period, REES and Green City Force held 35 information sessions at REES’s central office and offsite at MAP developments. This resulted in 65 NYCHA young adults enrolling into the program. Urban Farm Corp Cohort #14 graduated 29 residents and all secured employment. Clean Energy Corp began 1 cohort of 18. All youth who enrolled, successfully completed the program and secured employment. The model for the later was modified from prior cohorts. Youth secure paid employment while in training. This change has yielded better outcomes and has significantly improved the transition from training to employment. REES has supported this revision by increasing the number of info sessions and conducting continuous citywide outreach. A second cohort for the Clean Energy began in March 2018 in which 18 young adults enrolled in the program. Expected completion date is 9/6/2018.

In prior report, it was noted that Green City Force and NYCHA piloted a green construction training track of the NYCHA Resident Training Academy. This pilot graduated 11 residents. As an update, two of the eleven graduates participated in the academic preparation cohort mentioned previously. Both successfully passed the IBEW Local 3 aptitude exam and are now paid apprentices with the union, as well as, pursuing an AS degree.

**v. Resident Business Development Highlights**

**g. Food Business Pathways Program**

In 2018, NYCHA, the NYC Small Business Services (SBS) and non-profit partners launched year four of the NYCHA Food Business Pathways Program through support from Citi Community Development. The program bridges the financial, education and access to affordable space gap for NYCHA public housing residents and NYCHA section eight voucher holders seeking to formally launch and grow their food businesses. In 2018, REES enrolled 78 residents in total (38 in Cohort 8 and 40 residents in Cohort 9). 31 out of the 38 residents completed Cohort 8 and Cohort 9 is currently in session. To date across eight cohorts, 288 NYCHApreneurs have completed the program, 150 businesses have been formed, and 36 have received grants to cover approximately five months in a commercial kitchen incubator. Funding has been secured for an expansion of the program in 2018 through the continued investment of Citi Community Development. Additionally, in 2017, NYCHA executed an agreement with Brooklyn Navy Yard for select Food Business Pathways graduates to operate a kiosk located at the ground level in Building 77 at the Brooklyn Navy Yard. This kiosk, which will launch in October 2018, will provide an opportunity for eligible food businesses to identify new customers, have a physical

presence to sell their products, and grow their business while increasing their revenue. Funding for the programmatic portion of the kiosk project was secured through the Chase Foundation.

#### **h. Childcare Business Pathways Program**

Building on the success of the Food Business Pathways program, NYCHA in conjunction with SBS, and non-profit partners Business Outreach Center Network, and Childcare Development Support Corporation, began a second business pathways program called Childcare Business Pathways (CBP) in late 2016, also supported by Citi Community Development. CBP is a free 10-week intensive business course tailored specifically for NYCHA residents with a passion for starting a home-based childcare business. In 2018, 40 NYCHA residents enrolled and 36 have graduated across two cohorts. To date across four cohorts, 70 NYCHApreneurs have completed the program. In 2017, NYCHA secured a first-time investment by the NYC City Council Speaker's Office to enhance both Business Pathways programs. The fifth cohort will begin in January 2019.

**Objective:** Generate jobs and other economic opportunities for NYCHA Residents (Increase Section 3- related training, employment and contracting opportunities)

#### **Progress:**

##### **i. Resident Employment (Section 3 and Other Programs)**

From September 1, 2017 to August 31, 2018, REES facilitated 941 direct job placements. These job placements include those generated by outside contractors for various projects at NYCHA developments.

#### **Section 3 Business Concerns (S3BCs)**

NYCHA will continue to work with businesses to help identify qualified S3BCs, promote registration in the NYCHA S3BC registry, link S3BCs to programs, initiatives, increase their economic opportunities and contract awards.

Please note the recent steps NYCHA has taken to enhance our S3BC outreach and efforts:

NYCHA will continue to work to improve outreach, initiatives and contract awards to S3BCs.

- Beginning in 2016 and continuing in 2017 S3BCs were invited to participate in NYCHA's annual M/WBE & S3BC procurement fairs held on April 19, 2016 and May 4, 2017.
- S3BCs are invited to attend all NYC/NYS sponsored M/WBE events where NYCHA participates as exhibitor, to increase their networking and contracting opportunities
  - In 2017, NYCHA participated as exhibitor at 13 procurement fairs.
  - As of September 2018, NYCHA participated as exhibitor at 8 procurement fairs.
- NYCHA Speaking Engagements/Presentations for M/WBE vendors to educate/promote S3BC qualification/registration:
  - In 2017, NYCHA presented at six events.
  - As of September 2018, NYCHA presented at four events.
- S3BCs are referred to NYC Small Business Services for free programs and business assistance to help grow their capacity.
- As of 09/30/18, NYCHA has 172 S3BC's registered on the NYCHA S3BC directory which is updated monthly
  - <http://www1.nyc.gov/site/nycha/business/section3-business-concern-information.page#findS3BC>
- NYCHA provides information regarding S3BC's at pre-bid conferences to encourage prime contractors to subcontract to eligible S3BCs

- NYCHA’s Supply Management Procurement Department provides continuing education “procurement roadshows” to internal NYCHA Departments to inform them of S3BC registry and promote/encourage S3BCs for bid solicitations and micro-purchases

## **Increasing Earned Income Disallowance (“EID”) uptake**

REES continues to support the application of the Earned Income Disallowance as a work-incentive for NYCHA residents. Following automation of the EID process in NYCHA tenant data systems in 2012, an increase in income now triggers additional questions during the annual income review process, making it easier for Housing Assistants to recognize when to apply the EID toward a household. REES continues to educate its self-sufficiency program partners in the EID policy and program benefits for their clients. REES also has been successful at enlisting its partners in helping to educate and orient residents about the EID. Since REES began tracking EID in March 2012, 11,748 residents have received the EID as of August 31, 2018.

### **i. Family Self-Sufficiency Program (“FSS”)**

The Section 8 FSS Program is a HUD initiative that promotes economic self-sufficiency among participating families by referring them to educational, career counseling, money management, job training as well as job placement services. Participants receive a savings account which grows as the family’s earned income increases. Upon completion of the five-year FSS Contract of Participation, the family receives the money accumulated in the account, provided that no member has received cash public assistance in the preceding twelve months. The money may be used as a down payment on a home, as payment for higher education, as start-up capital for a business or to pursue other personal goals. Participating families run no risk to their Section 8 voucher and may continue to receive Section 8 assistance upon graduation from the program as long as they continue to meet Section 8 eligibility criteria. As of August 31, 2018, there were 907 participants in the program. A total of 398 participants or (41%) of these had active escrow accounts with an average balance of \$3,635.

## **Goal: Ensure equal opportunity in Housing for all Americans**

**Progress:** NYCHA reaffirms its commitment to affirmatively further fair housing through its sustained relationships with residents, applicants, advocates and organizations that assist people with disabilities and promote fair housing. NYCHA’s Department of Equal Opportunity, Services for People with Disabilities Unit, (SPD), assists applicants and residents with disabilities in obtaining decent, affordable and accessible housing in NYCHA developments. SPD serves as a liaison between the disabled community and NYCHA. In 2017, SPD responded to, or assisted with, 285 reasonable accommodation matters from residents, applicants, Section 8 voucher holders and/or their respective advocates. In 2017, SPD handled approximately 1,009 various matters from clients involving a range of services including, assistance with documentation, transfer requests, modifications of priority status, and reasonable accommodation requests for remediation of mold conditions in connection with asthma. There were 256 visits to SPD, and SPD provided information to a variety of organizations including: New York City Human Resource Administration, New York City Department of Homeless Services, New York City Mayor’s Office for People with Disability, and many others. Applicants, residents, and others in need of assistance with disability issues may call the “Hotline” at (212) 306-4652 or TTY at (212) 306-4845.

NYCHA affirmatively furthers fair housing by providing equal housing opportunities to residents, applicants, and Section 8 voucher holders. Residents, applicants, and Section 8 voucher holders may file internal housing discrimination complaints. Housing discrimination complaints filed with NYCHA by residents, applicants, or Section 8 voucher holders are investigated internally to determine if the



individual has been the subject of unlawful discrimination and determine if corrective or conciliatory action is necessary. In addition, applicants who have been found ineligible for public housing and assert the denial was based on their disability can have their cases reviewed by NYCHA's Department of Equal Opportunity ("DEO") Services for People with Disabilities. The DEO conducts internal investigations of complaints of fair housing discrimination filed with the NYCHA DEO by public housing residents and applicants for public housing. In 2017, NYCHA's DEO reviewed 51 fair housing matters and closed 56 Fair Housing investigations. There was 1 finding of housing discrimination which resulted in corrective action. In 2017, the SPD conducted no (0) disability-related right reviews of applications in which disabled applicants challenged their ineligibility for housing and asserted disability discrimination. The NYCHA Fair Housing Non-Discrimination Policy Statement is available on the NYCHA website at <http://www1.nyc.gov/site/nycha/residents/policies-and-procedures.page> and in audio format at 212-306-4600.

NYCHA's DEO provides annual updates to NYCHA's non-discrimination policies, including, the NYCHA Fair Housing Policy, Reasonable Accommodation Policy For Tenants, Housing Applicants And Section 8 Voucher Holders, Equal Employment Opportunity, and Sexual Harassment Prevention Policy. These NYCHA policies were last revised in January 2018 and include the provision of reasonable accommodations for applicable protected classifications, including, disability and victims of domestic violence, under applicable federal, state and local laws.

It is the policy of NYCHA to take reasonable steps to ensure Limited English Proficient ("LEP") persons may effectively participate in and benefit from NYCHA programs and services. The policy is in accordance with the United States Department of Housing and Urban Development notice entitled, "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient ("LEP") Persons." This final notice was published in the Federal Register at 72 FR 2732 (January 22, 2007).

NYCHA's Language Services Unit ("LSU") provides interpretative and translation services to NYCHA departments to enable them to communicate effectively with residents, applicants, and Section 8 participants who have been identified as persons with LEP. NYCHA's Language Assistance Policy takes reasonable steps to ensure that LEP have meaningful access to NYCHA programs and services. In support of this policy, LSU annually assesses NYCHA's language assistance needs; and monitors NYCHA's language delivery assistance services in conjunction with NYCHA's delivery of programs and services for residents, applicants, and Section 8 voucher holders. Additionally, the LSU recommends modifications to the Executive Department, as mandated, regarding NYCHA's delivery of language assistance services to persons with LEP. The LSU consists of two interpreters for each of the following languages: Spanish, Chinese and Russian, and they also manage the Language Bank. The Language Bank has 140 volunteers who speak 34 languages.

Key documents are translated and posted on our website in Spanish, Chinese and Russian, the languages NYCHA most frequently encounters.

Last year, NYCHA launched an LEP Pilot Project to review current processes in providing translation and interpretation services for LEP residents at NYCHA developments. The Pilot Project enables NYCHA staff to receive immediate over-the-phone interpretation services from a language vendor. The goals are to improve customer service for LEP residents; reduce wait times for over-the-phone interpretations; improve tracking and reporting for language services; and assist NYCHA's LSU in managing its time. Based on the positive results, NYCHA plans to continue to make this on demand interpretation service available to the development staff, and also extend it to NYCHA departments.

Additionally, NYCHA has “Printer Friendly” content as well as the “Translate this Page” feature on our web site.

**Goal: Violence Against Women Act (“VAWA”)**

**Objective:** Assist residents who are victims of domestic violence obtain an expedited confidential transfer and to enhance their safety.

**Progress:** From January 1, 2017 through December 31, 2017, the following cases were approved for transfer:

VAWA VDV	881
VAWA Dating Violence	35
VAWA Sexual Assault (includes CSV)	22
VAWA Stalking	57
Intimidated Victim	399
Intimidated Witness	57
Victim of Traumatic Incident	<u>40</u>
<b>Total:</b>	<b>1,491</b>

## 2. SIGNIFICANT AMENDMENT AND SUBSTANTIAL DEVIATION OR MODIFICATION OF THE AGENCY PLAN

### Criteria for Significant Amendment or Modification of the Agency Plan and/or Capital Fund Program Five-Year Action Plan:

NYCHA will amend or modify its agency plan and/or Capital Fund Program Five-Year Action Plan upon the occurrence of any of the following events during the term of an approved plan(s):

1. A change in federal law takes effect and, in the opinion of NYCHA, it creates substantial obligations or administrative burdens beyond the programs then under administration, excluding changes made necessary due to insufficient revenue, funding or appropriations, funding reallocations resulting from modifications made to the annual or five-year capital plan or due to the terms of a judicial decree.
2. Any proposed demolition, disposition, homeownership, Capital Fund financing, development or mixed-finance proposals.
3. Any Capital Fund project not already in the Five-Year Action Plan for an amount greater than \$500 million excluding projects arising out of federally declared major disasters.
4. Any other event that the Authority determines to be a significant amendment or modification of an approved annual plan and/or Capital Fund Program Five-Year Action Plan.
5. For purposes of any Rental Assistance Demonstration (“RAD”) project, a proposed conversion of public housing units to Project Based Rental Assistance or Project Based Voucher Assistance that has not been included in an Annual Plan shall be considered a substantial deviation.

## 3. OTHER INFORMATION

[24 CFR Part 903.7 9 (r)]

### A. Resident Advisory Board Recommendations

1.  Yes  No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)  
 Attached at Attachment M  
 Provided below:
3. In what manner did the PHA address those comments? (select all that apply)  
 Considered comments but determined that no changes to the PHA Plan were necessary.  
 The PHA changed portions of the PHA Plan in response to comments  
List changes below:  
 Other: (list below)

## **B. Description of Election process for Residents on the PHA Board**

*NYCHA's resident Board members are not elected. As per N.Y. Public Housing Law § 402(3), the City's Mayor appoints all seven Board members, including the three resident Board members.*

## **C. Statement of Consistency with the Consolidated Plan**

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction: (provide name here) *New York City*

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.

The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.

The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.

Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)

*The actions described within NYCHA's FY 2019 Annual PHA Plan support and assist New York City's efforts in addressing seven (7) of the City's Priority Needs goals, as outlined in its Consolidated Plan Five –Year Strategic Plan (2015-2019).*

- *Priority Need # 6 Public Housing*
- *Priority Need # 11 Non-Housing Community Development/Clearance*
- *Priority Need # 12 Non-Housing Community Development/Economic Development*
- *Priority Need # 21 Veterans Homelessness*
- *Priority Need # 23 Community Development Block Grant/Disaster Recovery*
- *Priority Need # 24 Affordable Housing for Low Income Seniors*
- *Priority Need # 28 Housing - New Construction*

*NYCHA's actions described in the FY 2019 Annual PHA Plan also support the City's initiatives to remove regulatory barriers that impede the creation of affordable housing choices as describe in the 2014 Consolidated Plan One-Year Action Plan Addendum: Affirmatively Furthering Fair Housing (AFFH). The FY 2019 Annual Agency Plan addresses both "Impediments to Fair Housing and Actions to Remove Impediments" (pages AFFH-8 and 9) and "Actions to be Taken - Near-Term Actions to be Undertaken # 3" (page AFFH-11).*

Other: (list below)

3. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

*The City of New York's Consolidated Plan serves as the City's official application for the four U.S. Department of Housing and Urban Development ("HUD") Office of Community Planning and Development entitlement programs. The Consolidated Plan includes an Action Plan, which includes two elements: 1) the description of the use of federal, state, city, private and nonprofit funding for housing, homeless assistance and prevention, supportive housing services, and community development activities; and 2) the Supportive Housing Continuum of Care for Homeless and Other*

*Special Needs Populations which describes the City's coordination of supportive housing services to the homeless and other special needs populations.*

*The Public Housing Agency Plan embodies, in many respects, the concepts of HUD's Consolidated Plan. The Plan provides a planning mechanism by which a housing authority can examine its long-term and short-term needs, specifically the needs of the families it serves, and design both long-term strategies and short-term strategies for addressing those needs. Like the Consolidated Plan, the Agency Plan involves consultation with affected groups in the Plan's development.*

#### **D. Additional Information**

##### **Second Replacement Housing Factor ("RHF") Funding Groups**

###### ***1) Second RHF Funding Group – First Increment RHF Plan***

- NYCHA will accumulate five years of Second Funding Group, First Increment Replacement RHF grants totaling \$7,110,861 for use in up-coming mixed-finance development activities. Since annual awards are small, NYCHA accumulates these grants over several years to have sufficient funding to complete a transaction.
- NYCHA has obligated all of grant NY36R005501-08 (\$853,997), NY36R005501-09 (\$790,086), NY36R005501-10 (\$776,218) and NY36R005501-11 (\$395,955) for construction of public housing units in the Randolph South Mixed-Finance transaction.
- NYCHA has obligated all of grant NY36R005501-12 (\$1,538,254) and a portion of NY36R005501-13 (\$651,630) for Phase I of the Prospect Plaza HOPE VI Revitalization Project.
- NYCHA has obligated a portion of the NY36R005501-13 (\$628,726) and all of grant NY36R005501-14 (\$1,475,995) for Phase II of the Prospect Plaza HOPE VI Revitalization Project.
- At this time, NYCHA is evaluating plans for the NY36R005501-15 (\$987,856) grant and the NY36R005501-16 (\$692,021) grant.

###### ***2) Second RHF Funding Group – Second Increment RHF Plan***

- NYCHA will accumulate five years of Second Funding Group, Second Increment RHF grants totaling \$2,578,340 for use in up-coming mixed-finance development activities.
- NYCHA will obligate all of grant NY36R005502-10 (\$258,796), NY36R005502-11 (\$333,158), NY36R005502-12 (\$496,383), NY36R005502-13 (\$646,103) and NY36R005502-14 (\$743,900) for construction of public housing units in Phase II of the Prospect Plaza HOPE VI Revitalization Project.
- At this time, NYCHA is evaluating plans for the NY36R005502-15 (\$759,649) grant, the NY36R005502-16 (\$445,969) grant and the NY36R005502-17 (\$234,795).

## **ATTACHMENT F**

### **Admissions Policy for Deconcentration**

HUD regulations (24 CFR Part 903) require a discussion of HUD's Deconcentration Requirement in NYCHA's FY 2019 Annual Plan. It was determined from the following Deconcentration Analysis that NYCHA does not need to develop an additional Deconcentration Plan for its Fiscal Year 2019 Annual Plan to comply with HUD's requirement.

Although 17 of NYCHA's qualifying 132 consolidated developments fall outside of an Established Income Range ("EIR"), NYCHA is exempt from developing an additional Deconcentration Plan to bring the 17 developments within the EIR primarily because all of NYCHA's developments are part of an explicit strategy to promote income mixing in each of its developments. This strategy is detailed in the Income Mixing Plan of NYCHA's Tenant Selection and Assignment Plan, and therefore, NYCHA already has a deconcentration plan built into its rental scheme.

### **Deconcentration Analysis**

The Rule to Deconcentrate Poverty and Promote Integration in Public Housing applies to all Public Housing Authorities ("PHA") funded by HUD, but specifically excludes from its applications the following types of developments within a PHA:

- developments with fewer than 100 public housing units;
- developments that are designated for elderly and/or disabled persons only;
- developments that are part of a homeownership program; and
- developments that are operated in accordance with a HUD approved mixed-finance plan using HOPE VI or public housing funds.

The developments' characteristics and tenant income data are from the Tenant Data System database as of January 1, 2018. This database contains household-level data for every occupied unit within NYCHA developments.

Of the 173,946 occupied units<sup>17</sup>, there are 141,940 units within 132 consolidated developments<sup>18</sup> that do not meet the exemption criteria and therefore, were used in this analysis.

Gross mean incomes from the excluded types of developments and units were not used in the calculation of the overall NYCHA mean. In total, 32,006 occupied units were excluded from the analysis. Table I presents the number of these units that fall into each exclusion category. See the Appendix for a list of the individual excluded developments.

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<sup>17</sup> There are 173,946 public housing households as of January 1, 2018.

<sup>18</sup> For the purposes of this analysis, there are 132 consolidated developments that have units that are not exempt from the application of the Deconcentration Rule. However, there may be units within these 132 developments that have been excluded.

As per Step 3 of the Final Rule, a development will be considered below the EIR if its mean gross household income<sup>19</sup> is less than 85% of the NYCHA mean; and a development will be considered above the EIR if its mean gross household income is above 115% of the NYCHA mean. The 2018 NYCHA mean gross household income is \$25,160, resulting in a lower EIR limit of \$21,386 and an upper EIR limit of \$28,934. In a recent amendment to the Deconcentration Rule, the definition of the EIR has changed to:

“include within the EIR those developments in which the average income level is at or below 30% of the area median income, and therefore ensure that such developments cannot be categorized as having average income ‘above’ the Established Income Range.”

30% of the 2017 HUD Area Median Income for the New York City HUD FMR Area (HMFA – includes the five boroughs and Putnam County) is \$19,860. However, this is less than 115% of the NYCHA mean gross household income, and therefore, NYCHA’s 2018 upper EIR limit remains at \$28,934.

Table I shows that out of the 132 consolidated NYCHA developments that are not exempt from the application of the Deconcentration Rule, there are 7 developments with 5,120 occupied units with gross mean household incomes below the EIR and 10 developments with 7,286 occupied units with gross mean household incomes above the EIR.

**TABLE I  
Summary Table**

Development Category	LOWER INCOME DEVELOPMENTS MEAN INCOMES <\$21,386		HIGHER INCOME DEVELOPMENTS MEAN INCOMES >\$28,934		TOTAL	
	Developments	Occupied Dwelling Units	Developments	Occupied Dwelling Units	Developments	Occupied Dwelling Units
Non-exempt NYCHA Developments	7	5,120	10	7,286	132	141,940

**TABLE II  
LOWER INCOME DEVELOPMENTS**

Table II lists the 7 consolidated developments with a mean gross household income of less than 85 percent (\$21,386) of the NYCHA mean of \$25,160.

Development Name	TDS #	Borough	Mean Gross Income	Occupied Dwelling Units
East River	009	Manhattan	\$21,026	1,148
Fort Washington	309	Manhattan	\$20,877	214
Hammel	075	Queens	\$18,917	863
Mill Brook	084	Bronx	\$21,371	1,369
Pennsylvania-Wortman	194	Brooklyn	\$21,296	332
Sedgwick	045	Bronx	\$20,720	775
South Beach*	035	Staten Island	\$21,220	419
<b>Total</b>			<b>\$20,739</b>	<b>5,120</b>

<sup>19</sup> Mean gross household income is defined as total household income before deductions.

The table above only includes units within the consolidated developments that qualify for inclusion in the Deconcentration Analysis, i.e., it excludes units that are elderly-only, mixed-finance, FHA, Hope VI, or MHOP. \*South Beach is enjoined from renting to working families and will therefore not be included in any outreach programs.

**TABLE III  
HIGHER INCOME DEVELOPMENTS**

Table III lists the 10 consolidated developments with a mean gross household income greater than 115 percent (\$28,934) of the NYCHA mean of \$25,160.

<b>Development Name</b>	<b>TDS #</b>	<b>Borough</b>	<b>Mean Gross Income</b>	<b>Occupied Dwelling Units</b>
Astoria	026	Queens	\$29,505	1,096
Borinquen Plaza I	243	Brooklyn	\$29,680	786
Fulton	136	Manhattan	\$34,780	940
Garvey	252	Brooklyn	\$29,579	232
La Guardia	076	Manhattan	\$29,717	1,377
Lafayette	122	Brooklyn	\$30,622	871
Ocean Hill Apartments	162	Brooklyn	\$30,619	356
Park Rock Consolidated	351	Brooklyn	\$30,755	804
Stuyvesant Gardens I	221	Brooklyn	\$30,102	327
Union Avenue Consolidated	342	Bronx	\$30,778	537
<b>Total</b>			<b>\$30,691</b>	<b>7,286</b>

The table above only includes units within the consolidated developments that qualify for inclusion in the Deconcentration Analysis, i.e., it excludes units that are elderly-only, mixed-finance, FHA, Hope VI, or MHOP.

Step 4 of the Deconcentration Requirement is an “option to provide reasons developments are outside of the Established Income Range.” In other words, it provides the opportunity to exclude entire developments or selected units from the application of the requirement to deconcentrate poverty and mix incomes if the income profile for these units or developments is consistent with furthering both the goals of deconcentration and the local goals and strategies contained in NYCHA’s Annual Plan. Developments and unit types that fall into this category are not limited to, but include those developments that:

- are subject to a consent decree agreement or a judicial decree covering the resident selection;
- are part of a PHA program/strategy that is specifically authorized by statute such as mixed income or mixed finance developments, a homeownership program, a strategy designed to promote income-mixing in public housing or one designed to raise the income of public housing residents;
- are designed via size, location or other configuration to promote income deconcentration;  
or
- have income characteristics that can be explained by other circumstances.



All 17 NYCHA developments that have mean gross incomes outside of the EIR from the Deconcentration Requirement should be excluded, because all NYCHA developments are part of NYCHA's explicit strategy to promote income-mixing in each of its developments. That strategy is spelled out in NYCHA's Tenant Selection and Assignment Plan ("TSAP"). Under the TSAP, each development must adhere to income-mix requirements each year, renting no less than 40% of its vacancies to Very Low-Income Families (making 30% or less of area median income), but balancing that with the Working Family Preference, which gives priorities to higher-income and working families.<sup>20</sup> This plan has been in place since 1998. Over time, it should produce a generally uniform and healthy income mix in all NYCHA developments. Since NYCHA already has this deconcentration plan built into its rental scheme, it need not do anything more to comply with the Deconcentration Requirement.

NYCHA has chosen, however, to be more aggressive in addressing the income mix at the Lower Income Developments. It has therefore targeted its Economic Integration Plan to those developments.

Step 5 of the Deconcentration Requirement outlines the policy for deconcentrating poverty and income mixing in developments where the developments' income profiles outside the EIR cannot be explained or justified. Step 5 also specifies that a PHA will be found in compliance with the Deconcentration Requirement if:

- all of the PHA's developments are within the Established Income Range;
- the PHA provides sufficient explanation in its Annual Plan to support the income mix of developments above or below the EIR as consistent with and furthering the goal of deconcentrating poverty, income mixing and the goals of the PHA's Annual and Five-Year Plans; or
- the agency's deconcentration policy provides specific strategies to promote deconcentration of poverty and income mixing at developments that are outside the EIR.

As explained above for Step 4, NYCHA can justify all the developments outside the EIR, because they are all part of the TSAP income-mix rental scheme. Even if this could not satisfy Step 4, however, NYCHA's TSAP rental scheme would satisfy Step 5, since it already constitutes a sufficient deconcentration plan explicitly designed to achieve a uniform and healthy income mix in each development. However, as noted above in Step 4, NYCHA has chosen to be more aggressive in addressing the income mix at the Lower Income Developments and has targeted its Economic Integration Plan to those developments. The Economic Integration Plan includes the following element:

- Applications Outreach to Tier III and Tier II applicants with incomes exceeding the "non-elderly average," informing them that they may be selected sooner for an eligibility interview if they are willing to accept one of the Working Family Priority Consolidations.

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<sup>20</sup> Federal law requires PHAs to rent no less than 40 percent of their vacancies to Very Low Income families, but it does not require them to apply this requirement to each development. NYCHA has chosen to apply the requirement to each development, with the explicit goal of producing a more uniform income mix. Likewise, NYCHA has designed its Working Family Preference to bring more working families into *each* development, to achieve a healthy and uniform income mix.

## APPENDIX - Individual NYCHA Developments Exempt from Deconcentration Rule

### Homeownership Developments

- FHA Homes

### Developments with Fewer than 100 Units

- 104-14 Tapscott Street
- 1162-1176 Washington Avenue
- 1471 Watson Avenue
- 154 West 84<sup>th</sup> Street (Dome Site)
- 335 East 111<sup>th</sup> Street
- Bedford-Stuyvesant Rehab
- Belmont-Sutter Area
- Betances II-13, 18, & 9A
- Betances III-13, 18, & 9A
- Boynton Avenue Rehab
- Bryant Avenue-East 174<sup>th</sup> Street
- Eagle Avenue-East 163<sup>rd</sup> Street
- East New York City Line
- Fenimore-Lefferts
- Franklin Avenue I, II, & III Conventional
- Frederick Samuel I, II & III (Former MHOPs)
- Grampion
- Harrison Avenue Rehab (Group A)
- Highbridge Rehabs (Nelson Avenue)
- Hoe Avenue-East 173<sup>rd</sup> Street
- Lenox Road-Rockaway Parkway
- Longfellow Avenue Rehab
- Lower East Side III
- Lower East Side Rehab (Group 5)
- Manhattanville Rehab (Group 2 & 3)
- Marcy Avenue-Greene Avenue (Sites A & B)
- Park Avenue-East 122<sup>nd</sup>, 123<sup>rd</sup> Streets
- PSS Grandparent Family Apartments
- Rehab Program (Wise Rehab)
- Rutland Towers
- Stanton Street
- Sterling Place Rehabs (St. Johns-Sterling)
- Teller Avenue-East 166<sup>th</sup> Street
- Washington Heights Rehab Phase III
- Washington Heights Rehab Phase IV (C & D)
- West Farms Square Conventional
- WSUR (Site A) 120 West 94<sup>th</sup> Street
- 131 Saint Nicholas Avenue

### Developments Designated for the Elderly Only

- Glebe Avenue-Westchester Avenue
- Baruch Addition
- Bethune Gardens
- Boston Road Plaza
- Bronx River Addition
- Cassidy-Lafayette
- Chelsea Addition
- College Avenue-East 165 Street
- College Point Rehab Program
- Conlon-LIHFE Tower
- Corsi
- Fort Washington
- Haber
- International Tower
- Kingsborough Extension
- La Guardia Addition
- Leavitt Street 34th Avenue
- Meltzer
- Middletown Plaza
- Morris Park Senior Citizens Home
- P.S. 139 Conversion
- Palmetto Gardens
- Randall-Balcom
- Reid
- Reverend Brown
- Robbins Plaza
- Shelton House
- Sondra Thomas Apartments
- Stuyvesant Gardens II
- Thurgood Marshall Plaza
- Twin Parks East
- Union Avenue & East 163rd Street
- UPACA Site 5
- UPACA Site 6
- Vandalia
- West Brighton II
- West Tremont-Sedgwick
- White
- Woodson
- Van Dyke II

- New Lane Shores

#### Mixed-Finance Developments

- 344 East 28<sup>th</sup> Street
- Amsterdam Addition
- Bay View
- Baychester
- Boulevard
- Bushwick
- Castle Hill
- Chelsea
- Drew-Hamilton
- Independence
- Linden
- Manhattanville
- Marble Hill
- Marlboro
- Murphy
- Rutgers
- Saint Mary's Park
- Samuel (City)
- Stapleton
- Williams Plaza
- Wise Towers

# ATTACHMENT G

## Community Service Description of Implementation

### NEW YORK CITY HOUSING AUTHORITY Community Service Policy Overview

According to requirements of Federal Law, all public housing residents who are not exempt must perform Community Service or Economic Self-Sufficiency activities for 8 hours each month as a condition of tenancy. This Community Service Policy Overview explains the exemptions and describes the Community Service requirement. During the Annual Review process the Authority will advise families of their Community Service status.

NYCHA will be increasing efforts to enforce this requirement and will be engaging with residents and resident leaders toward this end. NYCHA anticipates developing strategies to provide additional assistance to help residents comply with this mandate including:

1. Trying to increase the opportunities available through resident association driven activities to fulfill this requirement;
2. Providing additional information to residents using letters, posters, and Journal articles as well as the NYCHA website (including NYCHA activities that can be used to for Community Service and links to other websites with activities that can be found); and
3. Making it easier to document service by working with resident associations to provide receipts for Community Service hours at suitable events/activities.

NYCHA also anticipates requiring not complying residents to meet with their Housing Assistant.

**For those required to perform Community Service, successful documentation of the needed hours is a condition of tenancy and failure to perform this service can result in termination of tenancy.**

#### **I. EXEMPTIONS FROM COMMUNITY SERVICE**

There are many exemptions which allow residents not to perform Community Service. An exemption will excuse the resident from the performance of Community Service during the tenant's one-year Lease term, unless the exemption is permanent. Some exemptions can be identified by NYCHA using information in the Annual Review or Resident file. Others may be granted only after residents submit documentation. Forms and information are available from your RSA. When documentation is required for an exemption all forms must be filled-out and signed and returned to the development management office.

#### **Exemptions NYCHA identifies - No Additional Documents Needed**

1. **Age** - Below Age 18.
2. **Age** - Age 60 and older (permanent exemption).
3. **Employed** - An adult with no child below age 13 in the household and earning at least \$8,034 per year or working a minimum of 30 hours per week.
4. **Employed** - A single adult family with at least one child below age 13 in the household and earning at least \$5,356 per year or working a minimum of 20 hours per week.

5. **Employed** - A two adult family with at least one child below age 13 in the household: either or both adults must work and must earn at least \$9,373 per year, or either or both together must work a minimum of 35 hours per week, on the average.
6. **Disability Income** - Receiving Supplemental Security Income (“SSI”).
7. **Public Assistance** - All authorized family members living in the same apartment will be exempt from performing community service for one year if at least one family member receives welfare assistance or participates in a program that receives welfare monies and is in compliance with the rules of the program (*This exemption may require signed documentation*).

**B. Other exemptions - granted only with signed documentation**

8. **Blind / Disabled** (Certification by a doctor is required).
9. **Receiving Social Security Disability** (“SSD”) Income.
10. **Primary caretaker for the blind or disabled.**
11. **Vocational educational training** (available only **one** time per resident).
12. **Job skills training** directly related to employment, including attendance in a trade school. (The resident might not be currently employed, but employment may be dependent on successful completion of job training).
13. **Education directly related to employment**, in the case of an individual who has not received a high school diploma or a certificate of high school equivalency, if employment is dependent on successful completion of job training.
14. **Satisfactory attendance at secondary school** or higher.
15. **Satisfactory attendance in a course of study** leading to a certificate of general equivalence, if the resident has not completed secondary school or received such a certificate.
16. **Work experience** (including work associated with the refurbishment of publicly assisted housing) if sufficient private sector employment is not available, e.g., Youthbuild.
17. **On-the-job** training.
18. **Childcare provider** to a NYCHA child resident age 5 or younger (including your own child), if the child's parent - also a NYCHA resident:
  - Is performing Community Service, OR
  - Is exempt by NYCHA from performing Community Service because the parent is employed;
  - Childcare provider to a child age 6 through 12 may qualify if the child does not attend school due to Home Schooling, Home Instruction or is exempted by a school from attending for that year.

**II. COMMUNITY SERVICE CREDITS**

The following are CREDITS that reduce or eliminate the number of community service hours that a resident must perform in one year. These credits apply to the following special circumstances or activity. Note that the maximum number of hours that any resident must perform in one year is 96 hours (8 hours per month). One credit is equal to one hour of community service performed.

1. **Resident Association (“RA”) Officer:** A RA President, RA executive board members or Citywide Council of Presidents receive a credit of 8 hours of community service during any month in which they serve in office.
2. **Foster Parent:** A foster parent whose foster child(ren) lives in the same NYCHA apartment receives a credit of 8 hours of community service for every 30 days that the foster care relationship continues. Even if there is more than one foster child in the apartment, the credit remains at 8 hours per 30 days.
3. **Job Search and Job Readiness Assistance:** The resident is credited with **16** hours of community service (and not more than 16) for any job search activities during any lease

year. This is **not** an Exemption although verified on the *Community Service Exemption Verification – Education Job Training* form.

*Job readiness assistance* includes any of the following criteria:

- Training in job-seeking skills;
  - Training in the preparation of resumes or job applications;
  - Training in interviewing skills;
  - Participating in a job club;
  - Other related activities that may assist an individual to secure employment;
  - Receipt of Unemployment Insurance Benefits qualifies as job search.
4. **Military Service:** Any resident performing military service who is either on Active Duty (in the: Army, Air Force, Navy, Marine Corps or Coast Guard) or in a Reserve Component (in the: Army National Guard, Air National Guard, Army Reserve, Air Force Reserve, Navy Reserve, Marine Corps Reserve or Coast Guard Reserve) receives a credit of 96 hours of Community Service.
  5. **Temporary illness:** A resident who is ill and unable to work shall receive a credit of 8 hours for every 30 days of illness.
  6. **Victims of Domestic Violence, Intimidated Victims, and Intimidated Witnesses (VDV/IV/IW):** A resident whose request to transfer to another development as a VDV/IV/IW has been approved, receives a credit of 8 hours of community service for every 30 days that the transfer request is pending, or until the resident moves out of the apartment.
  7. **Incarceration:** A resident shall be credited for 8 hours of community service for every 30 days during his/her incarceration. Upon release from jail, the resident is required to perform community service, unless otherwise exempt.

### **III. COMMUNITY SERVICE REQUIREMENT**

Residents who are not exempt must perform Community Service or Economic Self Sufficiency activities at the rate of 8 hours per month. These hours may be performed flexibly. It is acceptable to perform less than 8 hours during any month if those hours are made up during another month. The resident **must**, however, be in compliance with the full number of hours at the annual review period, as reported on the Status Notice.

1. **Service Status Notice:** If the Service Status on the Status Notice for any household member is “Community Service Required,” and more than 24 hours is owed you must meet with your RSA.
2. **Performance of Community Service:** Residents may perform Community Service either at a facility located within a NYCHA development or a non-NYCHA facility. There are a wide range of providers that residents may choose from who offer many different types of Community Service eligible activities. A resident may, but does not have to, perform all Community Service activities with one provider. The resident may perform a variety of Community Service or Economic Self-Sufficiency activities.

<b>NOTICE</b>	NYCHA does not endorse any particular organization or assume any liability in connection with a resident's Community Service. Each resident is solely responsible for seeking an appropriate organization to fulfill this federal law requirement.
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Residents must provide verification of the services performed by submitting the *Community Service Performance Verification* form (Either short form or long form) to their development office by the time they submit their Annual Review documents. The long form (available from a RSA or from NYCHA website) must be filled out by the group or organization where the service was performed. The short form will be provided at NYCHA-sponsored events for which community service credit

is available. Once the form is completed, residents should keep a copy and return the original to the development management office.

Definitions of Community Service and Economic Self-Sufficiency and examples of qualifying activities are:

<p><b>Community Service</b> is <u>defined</u> by the law as: the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. Community Service is not employment and may not include political activities.</p>	
<p align="center"><b>Examples of where to find Qualifying Community Service Activities</b></p> <p>Residents may volunteer to perform Community Service with NYCHA or any federal, state or municipal agency, or for any community or faith-based organization. Residents can visit their Property Management Office or access volunteer opportunities through the following:</p> <ul style="list-style-type: none"> <li>▪ NYC Service – Located on the internet at <a href="http://www.nycservice.org">www.nycservice.org</a></li> <li>▪ By calling <b>3-1-1</b> the NYC Citizen Service Center</li> <li>▪ The <b>Volunteer Match</b> database located on the internet at <a href="http://www.volunteermatch.org">www.volunteermatch.org</a></li> </ul> <p>Residents can also perform service for groups not listed above. If there is any question about whether the service can be credited as Community Service, it is advised that residents ask their Property Management Office.</p>	
<p align="center"><b>Examples of NYCHA Community Service Activities</b></p>	
<p>Resident Watch</p> <ul style="list-style-type: none"> <li>▪ Resident Green Committees (“RGC”)</li> <li>▪ Attendance at Resident Association meetings</li> <li>▪ Delegate/Alternate at RAB meetings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Community Center/Senior Center volunteer</li> <li>▪ Help at resident sponsored community clean-up days</li> <li>▪ Attending meetings called by NYCHA</li> </ul>
<p align="center"><b>Examples of Non-NYCHA Community Service Activities</b></p> <p align="center"><b>Volunteer for local government, community, or faith-based organizations that serve a public benefit</b></p>	
<ul style="list-style-type: none"> <li>▪ Food Bank</li> <li>▪ Hospital</li> <li>▪ Nursing Home/Hospice</li> <li>▪ Ambulance service</li> <li>▪ Programs providing support to families with hospitalized members</li> <li>▪ Parks Department</li> <li>▪ Library</li> <li>▪ Reading Program</li> <li>▪ Parent Teacher Association (“PTA”) meetings</li> </ul>	<ul style="list-style-type: none"> <li>▪ School</li> <li>▪ After School Programs</li> <li>▪ Day Care Facility</li> <li>▪ Habitat for Humanity</li> <li>▪ Boys or Girls Club</li> <li>▪ AmeriCorps</li> <li>▪ Police Department</li> <li>▪ Auxiliary Police</li> <li>▪ Youth Mentoring</li> <li>▪ Vista</li> <li>▪ Court ordered Community Service</li> </ul>
<p><b>Economic Self-Sufficiency</b> is <u>defined</u> by the law as: any program that is designed to encourage, assist, train or facilitate the economic independence of its participants and their families. An <i>Economic Self-Sufficiency</i> program can also provide work for its participants.</p>	
<p align="center"><b>Examples of Qualifying Economic Self-Sufficiency Activities</b></p>	
<ul style="list-style-type: none"> <li>▪ Any REES or RES program <sup>1</sup></li> <li>▪ Work placement</li> <li>▪ Apprenticeship</li> <li>▪ Any program necessary to prepare a participant for work (including substance abuse or mental health treatment programs)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Employment counseling</li> <li>▪ Basic skills training</li> <li>▪ English proficiency</li> <li>▪ Workfare</li> <li>▪ Financial management</li> <li>▪ Household budgeting or management</li> </ul>

<sup>1</sup> REES is NYCHA’s Resident Economic Empowerment and Sustainability





**ATTACHMENT I**  
**Assessment of Site-Based Waiting List**  
**Development Demographic Changes**

**Stanton Street (NY005013590)**

Stanton Street is a 13-unit public housing development located at 189-191 Stanton Street, in lower Manhattan. The development is designated to serve a special needs population involving persons with acute immunological disorders of a degenerative nature or other disabilities or medical conditions requiring a high level of physical and supportive service accommodations, including homeless persons. NYCHA administers a site-based waiting list for this development. As approved by HUD, the first priority for these apartments is given to applicant referrals from designated public and private social service agencies for Stanton Street who are homeless. The second priority is given to NYCHA residents who were originally referred by designated public and private social service agencies for Stanton Street.

Based on the data available on January 1, 2018, Stanton Street housed 13 families having the following racial/ethnic characteristics. There was no change in the race/ethnic characteristics from last year. There were 8 heads of households reporting having a disability.

<i>White</i>	<i>Black</i>	<i>Hispanic</i>	<i>Other</i>
0	5	8	0

## **ATTACHMENT J**

### **SMOKE FREE HOUSING STATEMENT**

The U.S. Department of Housing and Urban Development (HUD) requires all public housing authorities to have a smoke-free policy in place by July 30, 2018. The HUD regulations are intended to improve indoor air quality, benefit the health of public housing residents and staff, reduce the risk of fires, and lower overall maintenance costs. Secondhand smoke increases the risk of asthma attacks, respiratory illness, stroke, heart disease, and lung cancer in nonsmoking adults and children. Children and seniors, nearly half of NYCHA residents, are often the most impacted by secondhand smoke. Eliminating smoking indoors and close to buildings is the best way to protect people from exposure to secondhand smoke.

NYCHA's smoke-free initiative, Smoke-Free NYCHA, is designed to create healthier homes for residents and healthier working environments for employees by reducing exposure to secondhand smoke and providing support to residents and employees who smoke and want to quit. The new policy took effect on July 30, 2018.

#### **NYCHA's Smoke-Free Policy**

NYCHA prohibits the smoking of tobacco products inside public housing apartments; in all indoor common areas; and within twenty-five (25) feet of public housing buildings or to NYCHA's property boundary if less than twenty-five (25) feet from a NYCHA building. Smoking in these areas is a violation of the public housing lease. Prohibited tobacco products are any item that involves the ignition and burning of tobacco leaves, including cigarettes, cigars, pipes, and water pipes (hookahs).

In addition, using electronic cigarettes (also called e-cigarettes or e-cigs) in indoor common areas is prohibited under local law. Local law does not prohibit the use of electronic cigarettes outdoors or inside apartments.

It is the responsibility of residents to inform their guests and visitors of the smoke-free policy and to ensure guests and visitors do not violate the policy. Residents are accountable for their own violations of the policy, as well as violations of their guests and visitors. The policy is about the smoke, not the person who smokes. NYCHA shall not deny housing to an eligible family because a household member is a smoker.

#### **Amending Leases**

In accordance with HUD regulations, NYCHA amended its public housing lease to include smoke-free provisions, which are binding on all residents. For new residents, the lease will contain smoke-free provisions. Existing residents received a smoke-free lease addendum by mail. The lessee (and co-lessee) were instructed to sign and return the lease addendum, which may be returned to the Property Management office in person, returned electronically, or returned by mail.

The smoke-free lease addendum states the following:

Your lease will be amended as follows: 12(dd): To assure that, in compliance with the Landlord's Smoke-Free Policy, the Tenant, any member of the household, a guest, or another person under the Tenant's control, shall not smoke prohibited tobacco products in restricted areas, as described in the Landlord's Smoke-Free Policy. Restricted areas include, but are not limited to, the Leased Premises, all interior areas of the Development or other developments of the Landlord, and areas within 25 feet of development buildings, or to the property boundary

where that boundary is less than 25 feet from the property line of a development building. Prohibited tobacco products include, but are not limited to, cigarettes, cigars, pipes, and hookahs (water pipes).

The Landlord's adoption of the requirements in this paragraph 12(dd) does not make the Landlord a guarantor of the Tenant's or any other resident's health or of the smoke-free condition of restricted areas. The Landlord specifically disclaims any implied or express warranties that the Landlord's public housing properties will have higher or improved air quality or will be free from secondhand smoke.

The Landlord will take reasonable steps to enforce the requirements of this paragraph 12(dd) utilizing a graduated enforcement policy, as provided in the Landlord's Smoke-Free Policy.

## **Graduated Enforcement**

In consultation with residents, staff, and the New York City Department of Health and consistent with HUD guidance, NYCHA has formulated a graduated enforcement approach to address violations of the Smoke-Free Policy. Graduated enforcement means NYCHA will respond to violations with escalated warnings and specific, progressive enforcement remedies while also connecting residents to resources.

Violations will be documented. NYCHA staff observing violations will report them to the Property Management office. Residents may report violations by calling the Customer Contact Center or notifying the Property Management office and providing details of the violation. Property management staff will not be able to identify every violation of this policy. Failure to enforce any part of this policy does not negate NYCHA's right to enforce the lease and policy at any future time.

Property Management staff will begin an informal resolution process if one or more of the following occurs:

1. One documented observation by NYCHA employees who know or reasonably can determine the identity of the violator; of:
  - a. A household member, guest, or other visitor smoking in a restricted area; or
  - b. Evidence of use of a prohibited tobacco product in a restricted area. Some examples include: observing an ashtray containing used cigarettes or smelling tobacco smoke emanating from an apartment.
2. Three recorded resident complaints to Property Management staff and/or three calls to the Customer Contact Center regarding:
  - a. Observing a resident, guest, or other visitor smoking in a restricted area; or
  - b. Reporting the smell of tobacco smoke emanating from another resident's apartment.

After a staff member has observed a resident violating the policy, or in response to multiple resident-generated complaints that a resident has violated the policy, Property Management will conduct an informal conference with the resident to discuss the violation or violations. Property Management will provide materials to educate the resident on smoking, the health effects of secondhand smoke, strategies to take the smoking outside the buildings and the 25-foot perimeter, and available smoking cessation resources. During the meeting the lessee will agree in writing to comply with the smoke-free policy and will acknowledge that further violations can result in the commencement of termination of tenancy proceedings.

If the household attends the informal resolution meeting and complies with the smoke-free policy for one year or more from the date of the informal resolution meeting, but violates the smoke-free policy thereafter, staff starts the informal resolution process over again.

Property Management staff will commence termination of tenancy proceedings if one or more of the following occurs:

1. The household fails to appear at the informal resolution meeting and does not respond within fourteen (14) calendar days of the scheduled date; or
2. The household participates in the informal resolution meeting and a resident, guest or other visitor violates the smoke-free policy within one year of the date of the informal resolution meeting.

NYCHA will also promote employee adherence to the policy through staff training, employee communication, and other means.

### **Reasonable Accommodation**

Use of a prohibited tobacco product in a restricted area is not a reasonable accommodation of a disability. A disabled resident who is mobility impaired and uses a prohibited tobacco product may request a transfer to a lower floor as a reasonable accommodation to enable him/her to access areas outside his/her building in which smoking is not prohibited.

### **Partnering with Residents, the NYC Health Department and Other Leaders**

Since the release of the HUD Rule, NYCHA has engaged residents, staff, city agencies, experts in smoking cessation, and others in dialogue about smoking and health. Smoke-free housing policy is fundamentally about promoting healthy living and working environments, and NYCHA will continue to work collaboratively to develop strategies and resources to educate residents about the health risks of exposure to secondhand smoke and to connect residents to cessation services for those who want to quit.

#### *Highlights of Engagement and Partnership Activities to Date:*

- In spring 2017, NYCHA and the NYC Health Department hosted community meetings on smoking and health that generated hundreds of initial ideas from residents on the new initiative.
- The NYCHA Advisory Group on Smoking and Health, formed in June 2017 and comprised of residents and partner members, helped guide the development of policy, engagement and partnership strategies. The Advisory Group released a report with its recommendation in July 2018.
- Over 1,500 residents at 54 NYCHA developments participated in Smoke-Free NYCHA Family Day interactive activities in 2017.
- The Smoke-Free NYCHA web page was launched in January 2018 featuring fact sheets, public notices, links to critical information, and other resources.

- In 2018, NYCHA is leading over 50 Smoke-Free NYCHA community meetings with residents at their developments.
- NYC Smoke-Free (part of Public Health Solutions) led the development of a video profiling Smoke-Free NYCHA produced by and featuring public housing alumni and youth leaders. NYCHA will promote the video to raise awareness about the new policy and the process of implementing the HUD Rule.
- Through partnership with Green City Force, young adult NYCHA residents have received training and led outreach and engagement at developments across the City. Two of the young adult residents trained were hired to lead targeted engagement and education efforts throughout spring 2018.
- The New York City Health Department developed customized educational materials for Smoke-Free NYCHA, facilitated a training of community health workers, and is leading smoking cessation support groups in select developments.

In total, NYCHA engaged over 21,000 residents in Smoke-Free NYCHA meetings, educational events, webinars, and other outreach forums between 2017-2018. NYCHA will work to advance Smoke-Free NYCHA implementation in alignment with other agency initiatives to achieve safe, clean, and connected communities. In any residential context smoke-free policy is an important component to healthy and sustainable housing, particularly for children, seniors, and residents of all ages with vulnerable health conditions.

**ATTACHMENT K**  
**Resident Advisory Board Members**  
**RAB DELEGATES/ALTERNATES 2018**

	<b>Delegate Name</b>	<b>Development</b>	<b>District</b>	<b>Delegate/ Alternate</b>
1	Lozano, Lilithe	Parkside	Bronx North	Delegate/CCOP
2	Hawkins, Iona	Parkside	Bronx North	Delegate
3	Hall, Robert	Gun Hill	Bronx North	Delegate
4	Clayton, Marie	Gun Hill	Bronx North	Delegate
5	Williams, Jacqueline	Twin Parks West	Bronx North	Delegate
6	Butler, Harvey	Sackwern	Bronx North	Delegate
7	Daughtry, Maxine	Soundview	Bronx North	Alternate
8	Lauray, Barbara	Fort Independence	Bronx North	Alternate
9	Jamerson, Princella	Millbrook	Bronx South	Delegate
10	Peterson, Miguel	Teller Avenue	Bronx South	Delegate
11	Serrano, Ray	Stebbins Hewitt	Bronx South	Delegate
12	Walker, Daniel Barber	Jackson	Bronx South	Delegate/CCOP
13	Topping, Ronald	Adams	Bronx South	Delegate
14	Tull, Gloria	Claremont Parkway	Bronx South	Delegate
15	Primus, Gwendolyn	Webster/Morrisania	Bronx South	Delegate
12	Bowman, Reginald	Seth Low	Brooklyn East	Delegate/CCOP
13	Johnson, Naomi	Howard	Brooklyn East	Delegate
14	Clifton, Rose	Howard Ave Rehab	Brooklyn East	Delegate
15	Green, Desiree	Crown Heights Rehab	Brooklyn East	Delegate
16	Prince, John	Rutland Towers	Brooklyn East	Delegate
17	Marshall, Lillie	Red Hook West	Brooklyn South	Delegate/CCOP
18	Feliciano, Wanda	Unity Tower	Brooklyn South	Delegate
19	Godfrey, Vonnette	Penn Wortman	Brooklyn South	Delegate
20	Carter, Deborah	Gravesend	Brooklyn South	Delegate
21	Brown, Frances	Red Hook East	Brooklyn South	Delegate
22	Boyce, Sheryl	Bayview	Brooklyn South	Delegate
23	Ballard, Raymond	Sumner	Brooklyn West	Delegate/CCOP
24	Keith, Leora	Tompkins	Brooklyn West	Delegate
25	Harrell, Cassandra	Bed Stuy Rehab	Brooklyn West	Delegate
26	Knox, Doretha	Berry Street South 9th	Brooklyn West	Alternate
27	Shipman, Lohoma	Bushwick	Brooklyn West	Delegate
28	Bradham, Vernona	Roosevelt	Brooklyn West	Delegate
29	Velez, Ethel	Johnson	Manhattan North	Delegate/CCOP
30	Green, Nathaniel	Dyckman	Manhattan North	Delegate
31	Herman, Patricia	Lincoln	Manhattan North	Delegate
32	Coaxum, Henry	Thurgood Marshall	Manhattan North	Delegate
33	McNear, Bernadette	Rangel	Manhattan North	Delegate

34	Javier, Abigail	Jefferson	Manhattan North	Delegate
35	Bergin, Rose	Isaacs	Manhattan South	Delegate
36	Gordon, Felicia	Hernandez	Manhattan South	Delegate
37	Quinones, Carmen	Douglass	Manhattan South	Delegate
38	Morris, Ann Cotton	Woodside	Queens	Delegate/CCOP
39	Anglero, Karen	Latimer Gardens	Queens	Delegate
40	Simpson, April	Queensbridge	Queens	Delegate
41	Coger, Claudia	Astoria	Queens	Delegate
42	Wilkins, Carol	Ravenswood	Queens	Delegate
43	Harris, Brenda	Cassidy/Lafayette	Staten Island	Delegate/CCOP
44	Parker, Geraldine	Stapleton	Staten Island	Delegate
45	Lewis-Clinton, Scherisce	South Beach	Staten Island	Delegate
46	Cunningham, Sylvia	Todt Hill	Staten Island	Delegate
47	Everette, Beatrice	West Brighton	Staten Island	Delegate
48	Brown, Lorraine	334 East 92nd St.	Section 8	Delegate
49	Munroe, Carlton	75 Martense Street	Section 8	Delegate

## ATTACHMENT L

### Agendas of Meetings Held with NYCHA's Resident Advisory Board (RAB)

## January 25, 2018 Agenda

- Roll Call / Introductions
  
- NYCHA's Capital Planning Program – 15 minutes
  
- FY 2018 Capital Plan & 5-Year Action Plan – 15 minutes
  
- Comments and Questions – 60 minutes
  
- Proposed Significant Amendment/Annual Plan Schedule and RAB Meetings
  
- Internal RAB Discussions - 30 minutes





## Attachment L

### Agendas of Meetings Held with NYCHA's Resident Advisory Board (RAB)

## Agenda February 8, 2018

- Roll Call/Introductions
- NYCHA's Smoke-Free Housing Policy – 15 minutes
- Comments and Questions – 60 minutes
- Internal RAB Discussions



Smoke-Free NYCHA



## Attachment L

### Agendas of Meetings Held with NYCHA's Resident Advisory Board (RAB)

# Today's Agenda

- Provide background on fair housing
- Introduce **Where We Live NYC**
- Share the City's engagement strategy
- Overview of the final report development
- Discuss NYCHA resident participation

2



## March 1, 2018 Agenda

- Roll Call / Introductions
- Assessment of Fair Housing (HPD) – 25 minutes
- Comments and Questions – 60 minutes
- Congress's Proposed Rent Reform Update
- Internal RAB Discussions - 30 minutes



2



## Attachment L

### Agendas of Meetings Held with NYCHA's Resident Advisory Board (RAB)

March 29, 2018 RAB Meeting

## Agenda

- Roll Call / Introductions
- Recovery and Resilience- Red Hook East
- 100% Affordable Sites
- NextGen Neighborhoods (50/50)
- PACT – RAD
- PACT – LLC II/Unfunded Units
- FHA Vacant Homes
- Comments and Questions



## Attachment L

### Agendas of Meetings Held with NYCHA's Resident Advisory Board (RAB)

May 3, 2018 RAB Meeting

## May 3, 2018 Agenda

- Roll Call / Introductions
  
- RAB Comments on the Significant Amendment to the FY 2018 Annual Plan and FY2019 Draft Annual Plan – 60 minutes
  
- Internal RAB Discussions - 30 minutes



## Attachment L

### Agendas of Meetings Held with NYCHA's Resident Advisory Board (RAB)

May 17, 2018 RAB Meeting

## May 17, 2018 Agenda

- Roll Call / Introductions
  
- RAB Comments on the Significant Amendment to the FY 2018 Annual Plan and FY2019 Draft Annual Plan – 60 minutes
  
- Internal RAB Discussions - 30 minutes



## ATTACHMENT M

### COMMENTS FROM THE RESIDENT ADVISORY BOARD (RAB) MEMBERS

#### Capital Improvements

- NYCHA needs to investigate contractors before hiring them and make sure they do not have violations against them or a history of bad performance for work done at NYCHA developments. Why does NYCHA restrict which vendors are allowed even if those vendors do not have the most affordable prices?

*NYCHA selects its construction contractors through a competitive bidding process as required by HUD. This process requires NYCHA to select the lowest responsive and responsible bidder. Part of the bid evaluation process is to determine if the bidder is responsive and responsible.*

*To be responsive, the bidder must have submitted a bid proposal that complies with the terms set forth in the bid solicitation. They must provide the required bonds, signatures, and cannot have altered the terms of the contract. To be responsible, the contractor must show that it has the experience and capacity to perform the contract work. NYCHA checks the financial background of the firm and the principals of the firm. NYCHA also checks references and reviews internal files if the contractor has previously performed work for NYCHA.*

*Contractors are evaluated by the construction evaluation groups that manage the construction projects in areas including timeliness, completeness, and quality of submissions; actual construction work; schedule, cooperation, and closeout performance in Pre-construction, Construction, and Closeout phases.*

*If construction is not satisfactory, the contractor will receive a negative evaluation. NYCHA may utilize provisions in its contracts to require correction of defective work. NYCHA also considers a contractor's past performance if the contractor bids on additional contracts in the future.*

*In addition, NYCHA screens contractors through the Vendor Name Check (VNC) process to ensure that contracts are awarded to responsible contractors, i.e. contractors with the capability in all respects to perform fully the contract requirements and the business integrity to justify the award of public funds. Contractors seeking to do business with NYCHA, for contract awards valued at over \$150k or more, or when the contractor has \$150k or more of NYCHA contracts within the preceding 12-month period, are required to file Vendor/Principle questionnaire disclosures in PASSPort, so that NYCHA can request a VNC Memo from the Office of Inspector General (OIG), review the OIG findings and solely approve for contract award those contractors deemed responsible.*

- NYCHA needs to evaluate the work that has been completed at Johnson Houses. The lobby and rear door installation were insufficient and needs to be redone.

*Residents should inform property management and provide photos/details if possible if they have concerns about the quality of construction work. That information would then be*

*relayed to the Capital Projects Department (“CPD”) for review and additional inspection. CPD would determine if the contractor needs to return to make additional repairs.*

*With regards to the entrance and exit doors at Johnson Houses, NYCHA defaulted the contractor and is currently working to formulate a corrective action plan.*

- Does NYCHA maintain a list of the top 10 best and top 10 worst contractors? Why or why not?

*NYCHA maintains a Capital Projects Contractor Evaluation System, a database which manages performance evaluations for capital projects vendors. Information from this database is reviewed when contractor is being considered for award of contract work to determine responsibility and performance.*

- NYCHA should establish a rating system for contractors that includes resident leader input as a factor.

*NYCHA evaluates all contractors and maintains a database that tracks and manages performance. The information is reviewed when contractor is being considered for award of contract work to determine responsibility and performance. NYCHA will explore opportunities to include resident leader input.*

- NYCHA needs to consult with the Resident Association presidents about what capital improvements are needed at their development.

*Every five years, NYCHA contracts with a private entity, with architectural and engineering expertise, to conduct a physical needs assessment to evaluate needs across its entire portfolio of properties. In addition, NYCHA’s Capital Planning group works very closely with property management operations staff to review needs including skilled trade work orders to prioritize investments given scarce funding resources.*

*Based on the suggestion above, NYCHA will explore opportunities to review recommended projects via NYCHA’s community engagement processes.*

- NYCHA should conduct site visits to developments to see what capital repairs are needed before allocating funds for the Capital Plan.

*NYCHA staff conduct site visits in advance to assess field conditions that inform fund allocations as part of the scoping phase of capital improvement projects.*

- NYCHA should understand that contractors do not want to work with NYCHA because of a history of NYCHA not paying contractors.

*NYCHA is required to pay vendors within 30 days of receipt of invoice for work as part of the General Conditions with contractors.*

- NYCHA needs to explain the process for how federal funding for the 5-year capital plan is allocated across the NYCHA portfolio.

*NYCHA is required by federal law to develop its priorities over a five-year period. As part of that process, NYCHA contracts with an independent entity to conduct a Physical Needs Assessment (PNA) of its entire portfolio to assess capital needs and estimate repair/replacement costs for building components. PNA findings inform NYCHA's allocation of federal resources, as per HUD requirements. Information on NYCHA's PNA can be found at the links below:*

<https://www1.nyc.gov/assets/nycha/downloads/pdf/PNA%202017.pdf>

[https://www1.nyc.gov/assets/nycha/downloads/pdf/2017%20PNA\\_Development.pdf](https://www1.nyc.gov/assets/nycha/downloads/pdf/2017%20PNA_Development.pdf)

- NYCHA needs to explain what happened to the Energy Performance Contract (EPC) funding in 2014.

*NYCHA currently has four active EPCs:*

1. \$18 million EPC (2013), 24 developments. EPC subsidies began in 2013, and this project is currently in the 5<sup>th</sup> year of 13 years.
2. Ameresco A EPC (under construction) 16 developments, \$55.5M
3. Sandy A EPC (under construction) 18 developments, \$43M
4. BQDM EPC (under construction) 23 developments, \$68M

*EPC improvements are funded by costs savings generated by the improvements. There is no outlay of HUD capital funds.*

- NYCHA needs to explain why Douglass has received funding for brickwork but has had scaffolding in place and work ongoing for years.

*Exterior brickwork is continually affected on a yearly basis due to New York's ongoing freeze and thaw cycles. Consequently, various degrees of brick deterioration occur yearly throughout our NYCHA brick buildings. This deterioration of brick requires cyclical repairs for any locations affected. The installation of scaffolding is required under the New York City Building Code to protect NYCHA residents and the public once brickwork deficiencies are identified through the time when the work is completed.*

- What is elevator 2-way communications in NYCHA elevators and who is listening?

*The 2-way system in NYCHA elevators connect to Verizon lines.*

- NYCHA should call the original roofers to make repairs since most roofs come with warranties and NYCHA should not be paying for the repairs.

*The original roofers can be called to make repairs if the warranty has not been invalidated and has not expired. Unfortunately, damage to the roof can invalidate the warranty, including having trash damage the roof or satellites installed on the roof.*

- NYCHA needs to explain where the Authority receives funding for capital work.

*NYCHA's capital work is funded by federal investments and by funds from New York State and New York City elected officials.*



- 1471 Watson needs funding to repair building roofs. When will this be included in NYCHA's 5-Year Capital Plan?

*This development was not included in the Mayor Roofing Initiative. The estimated cost to replace the roof would be roughly \$2.6M and NYCHA will explore addressing this need.*

- In 2016, NYCHA had an opportunity for boiler replacement funding and needs to explain if this funding was secured.

*NYCHA is not sure what opportunity for funding this comment is about.*

- When will Ravenswood Houses be receiving new boilers?

*Replacement of boilers at this development was proposed under the \$250M State Funding Request.*

- NYCHA needs to prioritize waste line repairs in capital funding.

*NYCHA prioritizes capital investments for exterior work to address critical roofing and brick deficiencies to make the building envelope watertight, and for systems replacements such as boilers and elevators. As these building components are brought to a state of good repair, NYCHA invests in building interiors such as waste lines.*

- Does NYCHA use the same rating system as the Boston Housing Authority for the Physical Needs Assessment?

*Similar to the Boston Housing Authority, NYCHA's PNA methodology is based on HUD guidelines which require that building components be replaced in priority year based on the expected useful life.*

- How are Regional Asset Managers involved with capital project determinations?

*Operations and property management staff evaluate the needs at developments and report their findings back to Central Office. The Capital Projects Division takes these recommendations into consideration when determining the capital project funding allocation.*

- NYCHA is not compliant with HUD regulations regarding the 5-year Capital Plan because NYCHA is filing a plan that is not addressing all of NYCHA's needs and funding is mismanaged. Capital needs are inadequate to meet the needs on all properties. Suggestion: Restructure capital needs to meet remediation with a completion-oriented time table

*NYCHA's aging housing stock requires far more capital investment than has been available from Federal, State, and City grants. Of NYCHA's over 2,400 residential buildings, 75% are more than 40 years old and have over \$16.5 billion in unfunded capital needs. Federal funding available to NYCHA for capital improvements has not only failed to keep pace with needs but has dramatically declined. From 2001 to 2016, annual federal capital grants have declined by 24 % and as a result, NYCHA has experienced a cumulative federal capital grant funding loss of \$1.375 billion since 2001. This chronic funding gap severely constrains NYCHA's ability to make necessary repairs and upgrades to all developments within its portfolio.*

- NYCHA says that issues related to heating and waste lines are Operations issues, but at the development, NYCHA staff says that these issues are capital projects. Which department is responsible for these issues?

*Collectively, NYCHA's main priority is to resolve issues that arise at developments. Repairs are conducted by Operations staff while comprehensive replacements fall under the purview of Capital Projects.*

- Most contracts present a work plan with a warranty. Why can't contractors be held accountable for their work (warranties)? By doing so, hundreds of thousands of dollars would be free to put elsewhere besides repeating work under warranty. If a warranty has been cancelled, then the Resident Associations need to be notified of such a cancellation.

*Contractors are held accountable for work performed under the warranty. Warranties have specific time frames and are maintained at the management office of a development.*

- Why is it that the same developments are always a part of the Capital Budget in every plan, while other developments only get on the Capital budget sparingly? (Howard Houses for example).

*Capital improvements within NYCHA's portfolio must compete for scarce resources and thus receive funding, based on regulated criteria, which assess the physical and maintenance needs of developments. Under NextGeneration NYCHA, NYCHA has also tapped non-HUD sources of funding such as the NY State Weatherization Assistance Program (WAP) to provide upgrades not represented in the Capital budget. Since 2016, \$4.2 million in WAP grants have been secured for work in more than a dozen NYCHA developments (including Howard Ave Houses and Belmont Sutter Houses in the Park Rock Consolidated). Typical scopes of work include boiler replacement, ventilation upgrades, new energy-efficient refrigerators and lighting, and new windows at some developments.*

- What is the comprehensive plan for budgeting funds for Park Rock/Crown Heights?

*At Park Rock Rehab, exterior brick repairs in the amount of \$5.26M was recently completed in 2016. At Crown Heights, exterior brick repairs in the amount of \$3.16M completed in 2016.*

*In terms of planned work, over \$7M will be invested at Park Rock Rehab including:*

- *Replacement of fire alarms in 2021, a total of \$100K of federal funds*
- *Replacement of roofs in 2022, a total of \$6.95M of city funds as part of the Mayor's Roof Initiative*
- *Replacement of interior compactors in 2022, a total of \$300K of federal funds*

- When will the grounds and benches be improved at Todt Hill Houses?

*This capital work is projected to be completed by February 2020.*

- NYCHA should detail the inspection process once work is completed by contractors.

*Near the end of the construction work, NYCHA staff walk the job with the contractor and create a "Punchlist" of open items that need to be completed before the contractor leaves*

*the site. When the contractor has completed all the work the Certificate of Final Acceptance is signed.*

- Who inspects contracted repairs?

*For capital-eligible work, contractors submit documentation and/or samples for review by the designer to confirm that the materials installed are the same or equal to the materials specified in the contract. NYCHA employs both in-house and consultant inspectors to monitor the work.*

*For non-capital eligible work, NYCHA specifies the materials. The development Superintendent is responsible for inspecting contracted work.*

- Who looks at the materials?

*NYCHA conducts quality assurance inspections on a sample of closed work orders in order to verify that the work was completed.*

- NYCHA prioritizes capital work at high rise buildings and does nothing to recognize scattered sites.

*Given the reality of physical needs of our housing stock outpacing limited funding resources, NYCHA aims, whenever possible, to maximize economies of scale by prioritizing projects that will benefit the most residents.*

- There are problems with the floors in Bedford-Stuyvesant Rehab. The floors were just replaced in 2015 and the tiles are cracked. How does NYCHA explain this ongoing issue? The residents request a proper engineering report about why the tiles are continuously breaking and peeling off.

*The floors at Bedford-Stuyvesant Rehab have been checked by engineers from NYCHA's Capital Projects division. Although there is some settlement due to the wood structure, it is within allowable guidelines. When floor tiles are replaced, the contractor is required to properly prep the underfloor prior to installing tiles.*

- Who inspected the new fire alarm system at 701 Willoughby Avenue at Bedford-Stuyvesant Rehabs?

*The fire alarm was installed by Capital Projects and is operational as of July 2018.*

## **Community Programs and Development**

- What types of job empowerment programs are available for NYCHA residents?

*NYCHA's Office of Resident Economic Empowerment & Sustainability (REES) implements programs, policies and collaborations to support residents' increased income and assets with a focus on employment and advancement, financial literacy and asset building, adult education and training, and business development. REES uses a partnership and placed-based service coordination model to identify and partner with high-quality providers in each service area.*

Currently, REES manages over 60 local and citywide partnerships and partners with city agencies such as NYC Small Business Services on large scale hiring and job training opportunities. The NYCHA Resident Training Academy (NRTA) is an employment-linked job training program funded by the Robin Hood Foundation. Since 2010, the NRTA has provided NYCHA residents with training in fields such as janitorial, construction, maintenance and pest control. Graduates are provided with one year of employment assistance, with most working at NYCHA or with NYCHA contractors post-employment. Additionally, NYCHA is part of the NYC Jobs Plus collaborative. Jobs Plus is a proven place-based employment program that provides customized employment services, financial counseling, rent incentives and peer-to-peer support to NYCHA residents. Jobs Plus is a collaboration between NYCHA, NYC Human Resources Administration, the Mayor's Office of Economic Opportunity, and the Department of Consumer Affairs. Residents interested in job training opportunities are encouraged to call REES at 718-289-8100 or visit us on the web at [www.opportunitynycha.org](http://www.opportunitynycha.org).

- A RAB member requests NYCHA's Law Department to present to the CCOP and RAB.

*Resident Engagement will seek clarity from the RAB on the specific topic they would like a presentation on and will gather the information and bring the information to the RAB.*

- A RAB member recommends the CCOP should plan two Borough Information Forums annually with NYCHA staff present for all resident inquiries before the Annual Plan is submitted.

*Resident Engagement will share this request with CCOP.*

- Where is the Section 3 plan?

*NYCHA provides contractors with information regarding Section 3 regulations and obligations prior to contract award in the Form of Proposal & General Terms and Conditions.*

- How many Section 3 Businesses does NYCHA current have in operation?

*As of 09/30/18, NYCHA has 172 Section 3 business concerns (S3BC) registered on the NYCHA S3BC directory, which is updated on a monthly basis.*

- NYCHA needs to highlight where the Section 3 resident-owned businesses are identified in the plan.

*The NYCHA Section 3 Business Concern Registry is located on the NYCHA website (see the following link) and updated monthly. The registry is available here:*

*<https://www1.nyc.gov/assets/nycha/downloads/pdf/Section3-Vendors-List-May-2018.pdf>*

- NYCHA needs to explain if there are still districts or if NYCHA only has clusters now. Removing districts is a violation of 24CFR 964.

*Cluster meetings do not change or replace the resident leadership structure at NYCHA. NYCHA still has a Citywide Council of Presidents (CCOP), District Council of Presidents (DCOP), and Resident Councils. Residents elect their Citywide, District and Resident Council presidents in accordance with the HUD regulations.*

*NYCHA holds cluster meetings with resident council board members to disseminate information to resident leaders concerning NYCHA initiatives and operations and to provide leadership development workshops. The entire executive board of each recognized resident council is invited to participate in cluster meetings which may include the president, vice president, treasurer, secretary and sergeant at arms and other elected board members. Cluster meetings are held separate and apart from CCOP and DCOP activities.*

- At a cluster meeting, a RAB member was told if they did not sign up for the TPA funding card, they would not be able to host a Family Day at their development. This is unfair and should not be a rule.

*To access TPA funds, a Resident Association (RA) must enter into a Funding Agreement with NYCHA. Many RAs utilize TPA funds for Family Days but not all, nor is it a requirement. Approval to hold a Family Day on NYCHA grounds is not contingent upon a Funding Agreement or use of a commercial credit card.*

- How will NYC HPD's Where We Live NYC be collaborative with NYCHA? *(The response below was provided to NYCHA by HPD)*

*NYCHA is part of the core project team for the Where We Live NYC process. Currently, HPD is working closely with NYCHA to analyze the existing conditions and root causes of fair housing issues in New York City – including working with NYCHA to identify data sources and lead roundtables with the City's Fair Housing Stakeholder Group. Later in the process, NYCHA will also be a key government partner in developing and vetting Where We Live NYC's goals and strategies to ensure they are comprehensive, feasible, and impactful for NYCHA residents.*

*Furthermore, HPD is working closely with NYCHA staff to hear directly from NYCHA residents. Members of the NYCHA RAB, CCOP, Section 8 Advisory Board, and Resident Leadership Academy have been invited to participate in the City's Fair Housing Stakeholder Group. HPD will also be working with NYCHA and the CCOP to host a series of focus-group style Community Conversations with residents about their experiences with fair housing issues – including housing discrimination, segregation, and access to opportunity. Through the Community Conversations, along with public workshops later in the process, NYCHA residents will have an opportunity to share how fair housing issues like segregation and housing discrimination impact their lives and provide input on prioritizing goals and strategies for Where We Live NYC.*

- HPD should make sure to engage NYCHA Section 8 residents as part of their outreach strategy for Where We Live NYC. *(The response below was provided to NYCHA by HPD)*

*Where We Live NYC will be conducting targeted outreach to voucher holders, like NYCHA Section 8 residents, as part of our engagement with New York City residents. We know that voucher holders face unique challenges when it comes to fair housing, which is why we have identified them as a priority population in this effort. We have invited members of the Section 8 Advisory Board to participate in the City's Fair Housing Stakeholder Group, and we will be organizing Community Conversations specifically focused on learning about the experiences of voucher holders in New York City.*

- A RAB member recommends that HPD utilizes the following outreach strategies for Where We Live NYC: putting information in the NYCHA Journal, including information in

NYCHA letters regarding the recertification process, and presenting at community board and community district meetings. *(The response below was provided to NYCHA by HPD)*

*These suggestions are helpful as the Where We Live NYC team develops strategies to inform NYCHA residents about Where We Live NYC and generate attendance at Community Conversations and public workshops, once these events begin. We look forward to continuing to work with the RAB, CCOP, and NYCHA staff to identify the best forums to connect with NYCHA residents.*

- What data will be provided to the RAB about the Where We Live NYC as the initiative progresses? *(The response below was provided to NYCHA by HPD)*

*Where We Live NYC has been designed to ensure the public, including the RAB, can review data analysis and insights throughout the process. This will include the analysis of local and regional data related to residential living patterns and access to opportunity – including access to education, health outcomes, transportation, and economic opportunity. The Where We Live NYC team will also be collecting robust qualitative data on the lived experiences of New Yorkers through the City’s Fair Housing Stakeholder Group, as well as the resident engagement done through Community Conversations and public workshops.*

*Updates from the analysis will be provided at each stage of the Where We Live NYC process through the Where We Live NYC website, the City’s Fair Housing Stakeholder Group meetings, and the public workshops. The data analysis along with insights from the public engagement will also be included in the Where We Live NYC report that will be shared as a draft for public comment in the final phases of the process. The Where We Live NYC team is also available to set up additional briefings with members of the CCOP and RAB throughout the process to share updates on how the data analysis is developing.*

- HPD should provide quarterly updates to the CCOP and attend district meetings. HPD should also do presentations at NYCHA developments to help inform NYCHA residents about the initiative. *(The response below was provided to NYCHA by HPD)*

*The Where We Live NYC team is available to provide regular updates on the Where We Live NYC process to the CCOP, as well as brief NYCHA resident groups who are interested in learning more. We look forward to continuing to work with the RAB, CCOP, and NYCHA staff to identify the best strategies to connect with NYCHA residents.*

- The RAB is tired of being used as a test audience about different city initiatives and would like to know how this work (*Where We Live NYC*) benefits the RAB and NYCHA residents. *(The response below was provided to NYCHA by HPD)*

*We understand that feedback fatigue is real. While not all feedback shared throughout the Where We Live NYC process will make it to the final goals and strategies, we believe that the perspective of NYCHA residents is critical to understanding the impact of fair housing issues like segregation and housing discrimination. The insights and partnership of NYCHA residents and community leaders will ensure that Where We Live NYC’s goals and strategies respond to the unique challenges and priorities of NYCHA residents.*

*We are also working to ensure our engagement process not only values residents’ time but also adds value to communities and the work of participating organizations. Our Community Conversations will serve as meaningful opportunities for residents to reflect with neighbors about issues of discrimination, equity, and racial justice in their*

communities. Furthermore, we will be sharing back the feedback we collect to allow community leaders and organizations to use this information to learn more about and advocate for their communities.

- The RAB wants to ensure that their input the Where We Live NYC Initiative is considered and is included in the final report. *(The response below was provided to NYCHA by HPD)*

*Where We Live NYC will be engaging NYCHA residents through the different stages of the Where We Live NYC process, and RAB members will have the opportunity to share input, review data and insights, and provide feedback through Community Conversations, public workshops, and the Where We Live NYC website. RAB members are also encouraged to participate in the City's Fair Housing Stakeholder Group to have a direct voice in each step of the process, and all members of the public will have a formal opportunity to comment on a draft of the report in the final phases of the process. The Where We Live NYC team is also available to set up additional briefings with members of the CCOP and RAB throughout the process to share updates and collect additional feedback.*

### **Financial Resources**

- A RAB member wants to know how the medical deductions will be changed because of Congress' proposed rent reform. NYCHA needs to explain how the definition of work will be altered because of Congress' proposed rent reform. If residents participate in resident watch, will it be considered part of their new work requirement as potentially required by Congress' proposed rent reform? Will the new Congressional bill, if passed, change the work requirement for residents? Will residents who are on fixed income, such as workers compensation and social security income, be affected by the new potential HUD rule?

*As of this writing, no rent reform bill has been introduced in Congress. There are only proposals right now. NYCHA will provide residents with details if a rent reform bill is introduced in Congress.*

- What is NYCHA's plan for the new funding that the Authority will be receiving under the 2018 budget passed by Congress?

*For the first time in decades, Congress significantly increased funding for affordable and public housing, including a more than 40 percent increase for public housing capital funding in 2018, compared to 2017. These funds will enable us to continue projects that make a real difference in residents' lives, addressing conditions such as mold, lead-based paint hazards, and vermin infestation.*

- How will NYCHA rectify the higher costs that residents must pay Con Edison for heating?

*The rent calculation for residents is based on their income, not on utility costs. The vast majority of residents do not pay separately for utilities. For those who do, NYCHA subtracts a pre-established fixed utility allowance from the monthly rent.*

- NYCHA needs to explain the rent determination policy more clearly. When residents get paid overtime and complete the next year's recertification, NYCHA calculates the rent including that overtime pay. The RAB recommends that NYCHA does not include overtime pay in rent calculations.

*In accordance with HUD regulations, the annual income for a household member is the gross amount earned prior to any deductions. This gross income includes overtime pay, commissions, fees, tips, bonuses and compensation for personal services. Residents may visit their Property Management office if they wish to discuss their rent calculation further.*

## **Operation and Management**

- NYCHA needs to make sure that FDNY and NYPD have keys to access the building lobbies in case of emergencies.

*NYCHA agrees that our public safety partners require access to our buildings. NYCHA's Office of Safety and Security will take the lead in cataloging the current state of access and coordinating the issuance of access to those partners who require it.*

- United Postal Service (USPS) drivers leave packages outside of buildings at West Brighton Houses which leads to theft.

*USPS (United States Postal Service) representatives are working continuously with NYCHA to discuss the installation of Parcel Lockers. Parcel lockers were installed at West Brighton in Spring 2017 and NYCHA is currently meeting with the USPS to determine the expansion of the Parcel Locker program at all senior developments citywide.*

*If residents are having issues with USPS deliveries or packages being left outside of buildings, they can file a complaint by calling the Tracking and Shipping Department at 1-800-742-5877 and request to speak with a Universal Representative.*

- The RAB wants to know what FlexOps is.

*FlexOps is an initiative launched in July 2016 at 12 developments that created flexible, staggered shifts for property management staff to provide better customer service. FlexOps extends the hours of operations for completing routine repairs, cleaning common areas, and scheduling meetings with property management to enable residents to meet with staff after work and be home for repairs appointments, improving their quality of life.*

- The RAB would like to know how FlexOps developments were selected and if there are any plans for expansion of the program to other developments.

*Phase I FlexOps developments were selected by evaluating several criteria, including Layered Access Control, CCTV, and geographical areas. Phase II FlexOps developments were chosen based on the number of volunteers for the shifts. As of September 2018, NYCHA has not finalized any plans for future expansion.*

- The RAB would like to know what the status of the lead-based paint inspections is.

*2017 Local Law 1 visual assessments of the units and 2018 Local law 1 visual assessments of the residential common areas are completed. The 2018 HUD and Local Law 1 visual assessments of the units began August 31, 2018. Remediation for units in the 2017 inspection is nearly complete.*



- A RAB member would like to know if all developments have water meters installed and if there will be an impact on residents living in larger developments and/or in high rise buildings.

*78% of our developments have meters installed, although only 17% of all developments are on metered rates. The remaining 83% of developments continue to be on Multifamily Conservation Rates (MCP). FAQs about Multifamily Conservation Rates are available here: <http://www.nyc.gov/html/dep/pdf/mcpfaq.pdf>. NYCHA plans to remain on the MCP rate and continues to be compliant with its requirements (and this includes installing water meters in our buildings). NYCHA would consider switching to metered rates only where it is financially beneficial.*

- Why can't NYCHA's Section 8 residents complete their annual recertification online?

*The completion of online annual recertifications started in 2014 for Section 8 residents. If there is anyone who is not completing this process online, he/she can phone or visit the Customer Contact Center and request access.*

- How would NYCHA and/or HUD treat a Section 8 household that had an elderly disabled person as the head of household responsible for and living with 3 teenagers? Would this household fall under the exception for the work requirements?

*There is no work requirement for Section 8 households as of October 2018.*

- A RAB member recommended that NYCHA conduct apartment inspections annually and that NYCHA inspect and replaces appliances within apartments. Appliances used to be inspected and replaced every 7 years, but this is no longer true.

*Funding constraints prevent NYCHA from continuing its former practice of replacing appliances after 15 years. From time to time, NYCHA receives dedicated funding through external sources (city or state funding) to replace appliances at specific developments. NYCHA's current practice is to replace appliances if they are not able to be repaired. A replacement appliance can be either new or used. Appliances are inspected and repaired, if possible, during apartment inspections.*

*NYCHA will take under advisement the recommendation to conduct annual apartment inspections.*

- NYCHA should notify residents of the findings of any inspections conducted in each apartment.

*NYCHA will be working to formalize a process for informing residents of inspection results.*

- NYCHA needs to improve the available voltage at Red Hook West in the summer because it is not possible to run more than one AC unit at a time or to iron and keep the AC running.

*NYCHA is aware of the issue and will review it further.*

- NYCHA needs to reform property management functions and include residents in the process so they can provide input about what areas need to be changed.

*NYCHA property management staff (Property Managers/Property Maintenance Supervisors) are encouraged to work closely with Resident Association (RA) leaders; the Property Manager or Property Maintenance Supervisor is required to attend monthly RA Meetings when invited. Moreover, under the Next Generation Operation property management model, which is in place at some developments and is being rolled out at all developments over the next year, Property Managers and Property Maintenance Supervisors are required to hold monthly meetings to foster greater communication between residents and Property Management staff, discuss policy and procedures, hear resident's concerns and suggestions regarding improving conditions, within the development, and discuss ways to implement change.*

- NYCHA needs to do a better job of enforcing the pet policy and forcing residents to clean up after their dogs on NYCHA campuses. Maintenance workers should not be responsible for cleaning up after dogs but NYCHA residents need to do a better job.

*NYCHA residents are required to clean up after their dogs. Dogs must be curbed, with solid dog waste disposed of in a garbage receptible. Residents who violate pet ownership rules are in violation of their lease and may be subject to appropriate action, which may include addressing the violation, removing the animal from the dwelling unit, or NYCHA's commencement of the termination of tenancy process.*

- A RAB member would like to know why NYCHA's pet policy is not enforced. The RAB recommends that NYCHA install a scale in every management office to weigh pets and the weight restrictions of the pet policy should be enforced.

*It is not feasible to install a scale at each management office to enforce this policy. NYCHA's forms require the tenant to enter an anticipated weight of the pet when fully grown.*

- NYCHA should provide more training for residents with pets so they understand the expectations of pet ownership on NYCHA campuses, including picking up after your dog.

*Residents receive a copy of the House Rules every year with their annual recertification. The House Rules provide a high-level overview of the pet policy.*

- NYCHA needs to explain why residents are receiving letters to go to NYCHA Central Office if they do not complete their annual recertification online.

*HUD regulations and the public housing lease require residents to recertify their household income and family composition every year. When a resident fails to complete their recertification, NYCHA will issue the resident a series of notices advising of NYCHA's intent to terminate their lease for noncompliance. The "Termination of Tenancy-Call in Letters" give tenants the opportunity to comply with NYCHA's annual recertification requirement before NYCHA commences termination of tenancy proceedings. If the resident fails to respond to requests or does not complete the Annual Recertification by the deadline, which is by the new lease effective date, NYCHA will start the tenancy termination process by sending the tenant a notice of charges and a date for a tenancy termination hearing. Residents should visit their Property Management Office if they believe they received these letters in error and for assistance in completing the Annual Recertification process. Residents can also view the status of their annual recertification online, 24 hours a day, 7 days a week, by logging into the Self-Service portal.*

- NYCHA needs to provide paper copies for annual recertification to senior residents who request them. NYCHA Management has been giving senior residents only loose, unstapled pages for their annual recertification if any paperwork at all and seniors need the entire booklet to complete the process.

*Any resident may request a paper version of the Annual Recertification Packet from their Property Management office. Property Management offices are no longer able to print out a paper recertification packet, but staff can request that a paper packet be sent to the resident by mail. Residents can choose to mail the completed paper packet to the P.O. Box address on the packet or return the packet to their Property Management office for further processing. Property Management Staff is available to assist with completing the annual recertification either online or on paper.*

- NYCHA should change the recertification process to the way it was previously, where residents could submit the form from the paper booklet with the complete employer verification information, rather than forcing residents to request pay stubs.

*In keeping with NextGeneration NYCHA's goal of operating as an efficient and effective landlord, since January 2016, NYCHA has been phasing in developments to introduce online Annual Recertifications, via NYCHA's Resident Self-Service portal. Instead of receiving, completing, and submitting a paper Annual Recertification packet, residents are notified of their upcoming recertification period and are invited to access the Self-Service portal to complete their online Annual Recertification. Once residents complete the first portion of their recertification, they receive a list of supporting documentation required based on the information they provided. Residents can upload the documents and submit their recertification. They will then receive confirmation that their Annual Recertification has been submitted to NYCHA. This new process offers residents more flexibility and visibility into the Annual Recertification process.*

*As part of the annual recertification process, NYCHA informs residents about the types of supporting documents they can submit as proof of the household's income. Pay stubs are just one example of the acceptable supporting documents.*

- A RAB member wants to know why there is only a Violence Against Women Policy (VAWA) and no policies for violence against men or elder abuse.

*Although the law is called the Violence Against Women Act, its protections are not limited to women. The law protects victims of domestic violence, dating violence, sexual assault, and stalking, regardless of the victim's sex, gender identity, sexual orientation, or age. For more information, please visit: <https://www1.nyc.gov/site/nycha/residents/vawa-resources.page>*

- NYCHA needs to clarify the process of what happens when a NYCHA resident choose to file a grievance or complaint. How are grievances tracked and followed up on by NYCHA?

*In adherence with NYCHA's Policy and Procedures, tenants may file a grievance in circumstances where they disagree with a decision made by Property Management. A grievant can submit a request by completing NYCHA form 040.302A, Project Grievance Summary, to the respective property management office. The Property Manager will review and meet with the grievant to determine the decision in the matter and provide the resident*

with the decision in writing. A grievant is offered another opportunity to escalate the Property Manager's decision with the corresponding Borough Regional Asset Manager. The Borough Office will track the decision using NYCHA form 040.302D, "District Grievance Summary". An eligible grievant can then ask for a grievance hearing in NYCHA's Hearing Office at 250 Broadway, where an impartial hearing officer will review and decide the matter. For more information on this policy, please visit: [https://www1.nyc.gov/assets/nycha/downloads/pdf/grievance-procedure\\_040302.pdf](https://www1.nyc.gov/assets/nycha/downloads/pdf/grievance-procedure_040302.pdf)

- NYCHA needs to improve the training process for NYCHA staff on the annual recertification procedures because the NYCHA staff are not doing a good job assisting residents, particularly elderly residents.

*NYCHA offers training to our property management staff to give them the appropriate tools to assist residents with Annual Recertifications and other matters. Please submit any suggestions for additional training in specific areas.*

- NYCHA needs to clarify why someone who is in active military service is receiving letters that they are not fulfilling the community service requirements.

*Public Housing residents who are currently on active duty with the armed forces- not necessarily deployed to a foreign country - automatically receive 96 hours of credit in community service and will not be required to perform community service for the year. Please contact your Property Management Office if you think you received letters about community service in error.*

- What is NYCHA's plan to address heat and hot water outages?

*NYCHA is implementing improvements to NYCHA's heat and hot water infrastructure and some equipment, as well as improving our responsiveness to residents' heat and hot water service requests. NYCHA has several planned improvements and goals in place for the upcoming heating season:*

*1) Improve system reliability by reducing unplanned heating outages. Actions include increasing preventive maintenance, developing effective performance metrics to reduce outage and restoration times, and providing real-time data on interruptions to heat and hot water service.*

*2) Continue to provide consistent adequate heating to every apartment. Actions include improving the response protocols for residents' heating complaints, providing better communication to residents about disruptions in heat and hot water services, and improving the work order process for heat and hot water problems.*

*3) Operate in an efficient and effective manner by aligning with industry best practices. Actions include utilizing a vendor to manage certain heating plants, allowing NYCHA's staff to focus on a smaller number of heating plants – this will bring our staff to boiler ratio closer to the industry standard.*

*In addition, NYCHA has long-term improvements planned, such as installation of new boilers.*

- What does the money collected from parking permits and fees get used for?

*The money is used at the respective development to cover the cost of maintenance and running the development.*

- Why aren't residents notified that it costs \$6.77 for the parking sticker?

*NYCHA is not aware of a fee for \$6.77 for parking stickers. The fee schedule is available on-line and the Management Office. Information about NYCHA parking is available here: <https://www.nychaparking.com/>.*

- Who is responsible for (1) cleaning parking spots and (2) monitoring illegal parking at Ravenswood Houses?

*Cleaning, maintenance and up-keep of the parking lots are all NYCHA responsibilities. Monitoring of illegal parking is shared between Property Management Staff (during regular business hours) and the Parking vendor.*

- A resident of Marshall Plaza applied for a parking space two years ago and did not receiving a pass and now people from outside of the development are receiving their parking permits sooner than he did.

*NYCHA residents have priority for available parking spaces at the developments.*

- What about parking? Who takes care of that? Give parking back to the people.

*Overall maintenance and up-keep of the parking lots are the development staff responsibilities. NYCHA hired a third-party vendor to issue the annual permits and to enforce parking rules. NYCHA residents have priority for available parking spaces at the developments.*

- What is happening with the parking lots in the Bronx?

*NYCHA will continue to enforce the parking rules at all the developments in coordination with the vendor and will be looking at more effective ways to deter vehicles with no permits to park at the developments. In addition to towing, NYCHA and the vendor will consider other enforcement mechanisms.*

### **RAD, Section 18 Demolition/Disposition and PACT Program for Unfunded Units**

- What is the timeline for the demolition of the building at Red Hook?

*Demolition of the building at Red Hook is expected by the end of 2018 and residents will see contractors on site by summer 2018.*

- Will any residents be displaced because of the demolition of the building at Red Hook?

*There are four households that must be relocated because of the demolition at Red Hook. As of March 2018, all residents have been offered apartments within the Red Hook Houses and either have moved, are in the process of moving, or are awaiting a proper match.*

- For apartments that have undergone FEMA renovations, plywood was used instead of concrete for the walls and the cabinets are sliding off the walls. Will NYCHA be repairing these apartments again?

*As of May 2018, the FEMA-funded first floor apartment renovation project has repaired 289 apartments that were damaged by Superstorm Sandy, including removal of plaster walls that were at risk for mold. The scope of these repairs varied on an apartment by apartment basis, but in all cases all apartment surfaces were cleaned twice using biocide cleaner. Plaster walls that were damaged were replaced with new gypsum wallboard. None of the renovated apartments had concrete walls. We cannot find a record of any work orders associated with cabinets sliding off the walls from any of the 289 apartments repaired under this program.*

- Are Park Rock/Crown Heights Rehab in consideration to be part of a RAD conversion?

*Yes, Park Rock/Crown Heights Rehab is currently under consideration for a RAD conversion.*

- The Resident Association presidents should attend all RAB meetings where their development is being discussed so that the resident association is properly represented at the meeting.

*NYCHA's Resident Engagement Departments extends invitations to Resident Association Presidents to all RAB meetings where their development is being discussed.*

- NYCHA should make sure to inform a resident association if their development is up for consideration for a RAD conversion. Community boards should be notified of all developments in their district that are up for consideration as well.

*NYCHA's Community Development Department advises and meets with the CCOP and Resident Association boards of the district and development once a development is being considered for a RAD conversion.*

- Does Transfer of Development Rights ("TDR") mean that NYCHA is selling developments?

*Transfer of Development Rights (TDR) has no effect on existing NYCHA buildings. To NYCHA, TDR means that NYCHA may sell extra square footage not being used for existing NYCHA buildings to neighboring property owners. NYCHA would retain all the land and buildings it currently owns. This program may potentially allow other property owners to develop more affordable housing near existing NYCHA developments and may also provide NYCHA with a much-needed revenue stream.*

- Has the potential of transferring development rights been discussed with NYCHA's NextGen Operations and Property Management departments?

*The RAB was one of the first presentations that the Real Estate Development Department gave on this potential program. TDR would have no impact on Operations or Property Management at NYCHA developments.*

- What are the criteria when NYCHA is determining which developments may be converted under the RAD program?

*Under NextGen NYCHA, the Authority is identifying 15,000 units in scattered site and obsolete developments to convert to Section 8. NYCHA uses four criteria to determine which developments may be converted. These criteria are: (1) the development has 400 units or less, (2) the tallest building in the development is no more than 7 stories, (3) the building-to-lot coverage ratio is above 25%, and (4) the development is already privately managed under a NYCHA contract.*

- Bedford-Stuyvesant Rehabs was recently awarded \$2 million dollars. Will this money go to waste when Bedford-Stuyvesant Rehabs is converted to Section 8?

*Bedford-Stuyvesant Rehabs is not scheduled for conversion as of July 2018. NYCHA is reviewing the financial feasibility of all potential conversions and NYCHA's Real Estate Development Department is working closely with NYCHA's Capital Projects Division to ensure all resources already allocated to developments will be utilized effectively.*

- There currently is a backlog of public housing apartments in NYCHA. How does NYCHA justify removing units from the public housing portfolio and converting them under RAD when there is a waiting list?

*NYCHA is only converting a portion of its public housing units to Section 8; the majority of NYCHA developments will remain in the public housing system. Furthermore, aside from the public housing waiting list, there is also a NYCHA Section 8 waiting list, and families on that list will move into newly vacated units in the converted RAD developments.*

- As of March 2018, is the Section 8 waiting list currently open?

*The Section 8 waiting list is not currently open.*

- West Brighton has 25 vacant units that have been vacant for decades. What does NYCHA have planned for these units?

*NYCHA does not have the funding to rehabilitate these units to make them safe to be inhabited again. NYCHA is exploring potential development scenarios to demolish the vacant units and build new affordable housing. NYCHA will work with the West Brighton Resident Association on all development plans.*

- When NYCHA is determining which developments will be included in RAD or have new construction built on a development's campus, does NYCHA call resident leaders to inform them of their potential plans?

*NYCHA's Community Development Departments advises and meets with the CCOP & Resident Association boards of the district and development once a development is being considered for a RAD conversion or a new construction project.*

- NYCHA should be asking resident leaders to form committees when new development and/or a RAD conversion is taking place at their development.

*NYCHA is committed to robust community engagement to ensure resident needs are heard and addressed. As such, beginning in 2016, public housing leaders and representatives of multiple community-based housing advocacy organizations, including Enterprise Community Partners, Legal Aid Society, and Community Service Society (CSS), came together for the very purpose of bringing a voice to PACT residents by forming the New York City Rental Assistance Demonstration Roundtable, known colloquially as the “RAD Roundtable” or “Roundtable.” The Roundtable’s initial goal was to develop “Guiding Principles” for the Section 8 conversions to ensure that the rights of public housing tenants were protected as NYCHA preserves properties through PACT. Since then, the Roundtable has taken on the role of developing a “RAD Handbook” for residents of converting developments that will provide key information and resources before, during, and after the conversion. The RAD Roundtable has continued to invite resident leaders from all developments slated for RAD conversions to join the Roundtable and serve as a conduit of information to their residents. Additionally, NYCHA engages with Resident Associations and/or Stakeholder Committees for all planned new construction projects.*

- What is the difference between low income and affordable housing?

*In May 2015, Mayor De Blasio released Housing New York: A Five-Borough, Ten-Year Plan to address New York's affordable housing crisis. In that Plan, a rental unit is considered affordable if a household pays less than 30% of its gross annual income on rent and utilities. A household paying more than 30% of its income on rent is considered "rent-burdened."*

*In Housing New York: A Five-Borough, Ten-Year Plan, income bands are calculated as a percentage of the Area Median Income (“AMI”) and households are classified according to income band as extremely low income, very low income, low income, moderate income, or middle income depending on the definitions associated with particular subsidy program guidelines. For example, typically extremely low-income households are defined as those earning less than 30% AMI, very low-income households are defined as earning 50% AMI or less. For more detailed information about affordable housing in New York City, please visit: <https://www1.nyc.gov/site/hpd/renters/find-housing.page>.*

- NYCHA needs to explain the differences between RAD, PACT, and Section 18 because they do not have the same regulations, rights, and laws that apply to each program, which affects residents.

*NYCHA will be providing FAQs on the PACT-RAD and PACT-Unfunded Units programs to ensure full clarity on the sub-programs.*

- The RAB would like to know if NYCHA policies will be applicable for developments that undergo a RAD conversion and if all resident rights are preserved.

*The purpose of the PACT initiative is to protect residents’ rights while stabilizing the developments financially to facilitate extensive rehabilitation work, and to keep the property permanently affordable. In summary, this means that residents:*

- *Have the right to stay in the development without further rescreening;*
- *Have the right to return if relocation is necessary, although the conversion will involve only tenant-in-place rehabilitation work and no relocation is contemplated to take place;*



- *Have the right to organize and continue to receive funding for tenant participation activities from the property management budget;*
  - *Retain the right to a hearing to resolve grievances;*
  - *Be protected under the RAD Roundtable Guiding Principles; and*
  - *Generally pay no more than 30 percent of adjusted gross income towards their rent.*
- Will developers be able to impose new rules or regulations on residents living in RAD developments?

*Residents in PACT developments will work with their new development partner to revisit the content and enforcement of house rules. In addition, residents will have to execute new leases to reflect the fact that they are Section 8 tenants rather than public housing tenants.*

- NYCHA needs to clarify what will happen when people who are living in an apartment but are not on the lease undergo a RAD conversion.

*As part of the PACT-RAD conversion process, NYCHA works with Legal Aid to host “lease addition days” where residents can add household members and register appliances on their public housing lease prior to the Section 8 conversion.*

- NYCHA has not adhered to the regulations (HUD 24 CFR 970.9) for RAD conversions or for the new builds. Resident leadership has not been permitted the opportunity to participate as is required by this regulation.

*RAD conversions are not covered by the 24 CFR Part 970 regulations. However, as noted previously, NYCHA is committed to robust community engagement to ensure resident needs are heard and addressed.*

*New construction of non-public housing on NYCHA property is usually through a Section 18 disposition application to HUD and is covered under 24 CFR Part 970. NYCHA does engage in the required resident consultation under 24 CFR Section 970.9. In addition, pursuant to 24 CFR Section 970.9(b)(3), NYCHA does not have to offer the property proposed for the new construction to an eligible resident organization if the property is to be used for low-income housing or the property is non-dwelling property. Please see the regulations at 24 CFR Section 970.9(b)(3).*

- Is NYCHA or the NYC Department of Housing Preservation and Development (HPD) the lead for the development at Holmes Towers?

*NYCHA is the lead agency on this project. However, there are aspects of the project, such as the proposed Area Median Income (AMI) levels associated with the HPD Term Sheets and housing lottery, that are determined by HPD.*

- During the early meetings in October and November of 2015, Holmes residents were advised that the proposed Tower would only be 33 floors and the developer would have to pay down all the capital needs [\$33 million at that time] before the developer could start the build or project, if you will. As of March 2018, Holmes capital needs would only receive \$12 million instead of the whole amount. Why has this changed?

*NYCHA did not guarantee that the revenue generated from this project would address all of the capital needs at Holmes. Specifically, the November 4, 2015 presentation, states: How much money will be reinvested into Holmes?*

- *Significant portion*
- *Determined by the final scope of project informed by residents*
- *Final numbers depend on competitive bid proposals received*

*All proposals were evaluated competitively through the RFP process, which included evaluation of the return to NYCHA. Currently, NYCHA expects to receive at least \$25 million through the ground lease, half of which will go towards repairs at Holmes. We are working with the resident stakeholder committee, the developer, and their contractor to scope and plan repairs. We hope that by completing repairs simultaneously with the construction of the new building that we will be able to reduce price by efficiencies of scale and stretch every dollar we are getting even further.*

*It is correct that the presentation in November 2015 also stated that the new building would be between 25-33 stories. The proposal that was selected is planned for approximately 50 stories, but is a narrower building, blocking less light to existing NYCHA apartment windows and requiring a smaller building footprint than a shorter, bulkier building.*

- Why has NYCHA not presented about the development at Holmes Towers to the Community Board 8 Housing Committee?

*Fetner Properties and NYCHA presented to the CB8 Housing Committee on September 14, 2017.*

- In August 2017, the resident engagement meeting at Holmes Towers with Fetner Properties stated that Section 3 is not required. Page 5 of the RFP (63877) states the definition of Section 3 24 CFR 135. However, Section 3 is triggered by 24 CFR 963 as well. Will Section 3 be required at Holmes Towers?

*Although the Holmes Towers development project is not subject to Section 3 hiring requirements, NYCHA will impose contractual obligations on the developer to work with NYCHA's REES Department to hire NYCHA residents in connection with this development project. The Holmes developer is committed to a robust NYCHA resident hiring plan and working with NYCHA resident-owned and/or local businesses to the extent possible.*

- Has NYCHA determined the developer fee that will be given to Fetner Properties? Will the developer fee be 10% or 15%?

*Developer fee is allowed on the affordable housing only. HPD term sheets state that total developer fee is not to exceed 15% of improvement costs (excluding developer fee, reserves, and syndication and partnership expenses) and 10% of acquisition costs for tax credit projects. Up to 10% of the fee may be paid during construction.*

- Why did the height of the project at Holmes Towers increase from 33 stories to 47 stories?

*It is correct that the presentation in November 2015 also stated that the new building would be between 25-33 stories. The proposal that was selected is planned for approximately 50*

*stories, but is a narrower building, blocking less light to existing NYCHA apartment windows and requiring a smaller building footprint than a shorter, bulkier building.*

- Why are the mechanicals not going on the roof at the development at Holmes Towers?

*There is a mechanical floor in the middle of the buildings as well as on the roof. This is done for efficiency of the systems (less travel distance for heat to the lower floors).*

- Fetner Properties projected equity is between \$45-50 million [construction loan is \$175,000,000] with upfront good faith of \$25,000,000 for 99-year lease. This \$25,000,000 equates to \$83.3 per square foot for 99 years. Does NYCHA believe this was a good deal?

*All proposals were evaluated competitively through the RFP process, which included evaluation of the return to NYCHA. Currently, NYCHA expects to receive at least \$25 million through the ground lease, 1/2 of which will go towards repairs at Holmes. We are working with the resident stakeholder committee, the developer, and their contractor to scope and plan repairs. We hope that by completing repairs simultaneously with the construction of the new building that we will be able to reduce price by efficiencies of scale and stretch every dollar we are getting even further.*

- Fetner Properties submitted “infill” plans from Holmes Towers. This plan was in draft form which excluded important information:
  - Actual height of the building
  - Will it require a mayoral zoning override because it does not comply with the underlying zoning? If so, how out of compliance is it?
  - Zoning district is R8 which is currently mapped in only a few places in CB8
  - Sky exposure plane forces buildings to the center of the block the taller they get—narrow street [standard sky exposure plane]
  - Sky exposure plane is 480 feet tall within three feet of the street line
  - Violates initial setback distance which should setback 15 feet at 85 feet
  - Allowable floor area ratio [FAR] varies according to the “height factor”
  - Large amounts of open space are required for tall buildings
  - Sometimes open space can be on top of community facility buildings—has this been considered?
  - What are height factor calculations for Block and Lot [1573, Lot 20]?
  - What are height factor calculations for total development: New and Existing?
  - Will Fetner require a mayoral zoning override for conditions that cannot be met?
  - Has there been an environment review [EIR]? If so, please provide.
  - What are the public/residents’ benefits that would justify a mayoral zoning override?
  - Will other NYCHA infill sites use a similar strategy?
  - Should the Mayor waive zoning requirements for a for-profit developer?

*All these issues will be included in the submission to the NYC Department of Buildings (“DOB”). DOB ensures compliance with zoning. It is anticipated that a waiver may be sought for some items including penetration of the sky exposure plane. The actual height of the building is planned to be approximately 500 feet. The environmental review is in progress and will be shared once the results are finalized. Any adverse impacts of the new development will be addressed.*

- Fetner Properties presented to CB8 Housing Committee on September 14, 2017. Fetner deferred to NYCHA and promised CB8 Housing Committee that we would have the design plans in January of 2018. As of March 2018, the committee has not heard from Fetner nor have we seen a copy of the design plans.

*NYCHA is currently focused on the exterior, landscape, and playground planning as those areas will be used directly by NYCHA residents of Holmes Towers. After developing an outreach strategy with the Stakeholder Committee in October and November, NYCHA and Fetner Properties held 3 sessions on February 7, 2018 to discuss open space and playground planning and presented a report back and conducted further engagement at the monthly Resident Association meeting on March 20, 2018. Schematic designs have been presented publicly and did come prior to the detailed discussion on landscape planning. Building plans will be submitted to the DOB at approximately 70% completion in summer 2018 at which time we can share with residents.*

- The RFP stipulates that the plans must be submitted within six months. That said, March 2018 is the 11-month and the plans appear to be past due. As a result, the contract/award should be null and void for non-compliance.

Section VI (d) of the RFP, Obligations of the Selected Developer, stipulates the following:

“Within six (6) months of selection the Developer must complete a set of schematic site plans, floor plans, and elevations that include any modifications to the original plans included in the Proposal in response to this RFP, as agreed upon by NYCHA and HPD and the Developer and submit them to NYCHA and HPD for review and approval. Prior to disposition, the Developer must submit a complete set of final site plans, floor plans, elevations, samples of exterior building materials, and detailed specifications to NYCHA and HPD for review.”

*Fetner Properties has been providing schematic design documents to both HPD and NYCHA throughout the pre-development process and will provide final documents prior to execution of the ground lease.*

### **Safety and Crime Prevention**

- Someone needs to monitor the CCTV cameras at all developments, including Parkside Houses. NYCHA property management at each development needs to become more involved with CCTV camera surveillance. Who is looking at cameras at Lincoln? Who is checking hallways and exits daily? Someone needs to be monitoring the camera at Adams.

*With over 16,000 cameras installed throughout NYCHA’s portfolio, NYCHA does not have the resources to monitor all cameras in real time. While used extensively by our law enforcement partners to take law enforcement action, NYCHA’s Property Management teams currently use these systems to identify persons who negatively impact the quality of life at a development and to improve operations of the property. NYCHA will continue to emphasize the importance of these tools to the overall management of a property and will look for additional opportunities to leverage this investment.*

### **Smoke Free Housing Policy**

- Will language be added to the lease about the repercussions of violating the no-smoking policy?

*Yes. New residents will sign a lease containing smoke-free provisions. Existing residents have received a lease addendum with smoke-free provisions.*

*The smoke-free lease addendum and the public housing lease state the following:*

*12(dd): To assure that, in compliance with the Landlord's Smoke-Free Policy, the Tenant, any member of the household, a guest, or another person under the Tenant's control, shall not smoke prohibited tobacco products in restricted areas, as described in the Landlord's Smoke-Free Policy. Restricted areas include, but are not limited to, the Leased Premises, all interior areas of the Development or other developments of the Landlord, and areas within 25 feet of development buildings, or to the property boundary where that boundary is less than 25 feet from the property line of a development building. Prohibited tobacco products include, but are not limited to, cigarettes, cigars, pipes, and hookahs (water pipes).*

*The Landlord's adoption of the requirements in this paragraph 12(dd) does not make the Landlord a guarantor of the Tenant's or any other resident's health or of the smoke-free condition of restricted areas. The Landlord specifically disclaims any implied or express warranties that the Landlord's public housing properties will have higher or improved air quality or will be free from secondhand smoke.*

*The Landlord will take reasonable steps to enforce the requirements of this paragraph 12(dd) utilizing a graduated enforcement policy, as provided in the Landlord's Smoke-Free Policy.*

- **What are the repercussions for violating the no-smoking policy? Will the repercussions be legal or criminal? Will residents be evicted if they have a certain number of violations of the no-smoking policy reported? Several RAB members are concerned about what happens once they sign and acknowledge the smoke free policy and what are the repercussions if they don't sign. Will they be evicted?**

*The goal of NYCHA's smoke-free policy is not to evict people. Smoke-Free NYCHA is designed to create healthier homes for residents and healthier working environments for employees by reducing exposure to secondhand smoke and providing support to residents and employees who smoke and want to quit. The smoke-free provisions in the lease addendum are in effect as of July 30, 2018 regardless of whether the tenant signed the lease addendum.*

*In consultation with residents and staff, and consistent with HUD guidance, NYCHA has formulated a graduated enforcement approach to address violations of the smoke-free policy. Graduated enforcement means NYCHA will respond to violations with escalated warnings and specific, progressive enforcement remedies while also connecting residents to resources.*

*Violations will be documented. NYCHA staff observing violations will be able to report them to the Property Management office. Residents may report violations by calling the Customer Contact Center or notifying the Property Management office and providing details of the violation. Property Management staff will not be able to identify every violation of this policy. Failure to enforce any part of this policy does not negate NYCHA's right to enforce the lease and policy at any future time.*

*Property Management staff will begin an informal resolution process if one or more of the following occurs:*

- 3. One documented observation by NYCHA employees who know or reasonably can determine the identity of the violator; of:
  - a. A household member, guest, or other visitor smoking inside public housing apartments, in all indoor common areas, and within twenty-five (25) feet of public housing buildings or to NYCHA's property boundary if less than twenty-five (25) feet from a NYCHA building ("restricted areas"); or*
  - b. Evidence of use of a prohibited tobacco product in a restricted area. Some examples include: observing an ashtray containing used cigarettes or smelling tobacco smoke emanating from an apartment.**
- 4. Three recorded resident complaints to Property Management staff and/or three calls to the Customer Contact Center regarding:
  - a. Observing a resident, guest, or other visitor smoking in a restricted area; or*
  - b. Reporting the smell of tobacco smoke emanating from another resident's apartment.**

*After a staff member has observed a resident violating the policy, or in response to multiple resident-generated complaints that a resident has violated the policy, Property Management will conduct an informal conference with the resident to discuss the violation or violations. Property Management will provide materials to educate the resident on smoking, the health effects of secondhand smoke, strategies to take the smoking outside the buildings and the 25-foot perimeter, and available smoking cessation resources. During the meeting the lessee will agree in writing to comply with the smoke-free policy and will acknowledge that further violations can result in the commencement of termination of tenancy proceedings.*

*If the household attends the informal resolution meeting and complies with the smoke-free policy for one year or more from the date of the informal resolution meeting, but violates the smoke-free policy thereafter, staff starts the informal resolution process over again.*

*Property Management staff will commence termination of tenancy proceedings if one or more of the following occurs:*

- 3. The household fails to appear at the informal resolution meeting and does not respond within fourteen (14) calendar days of the scheduled date; or*
- 4. The household participates in the informal resolution meeting and a resident, guest or other visitor violates the smoke-free policy within one year of the date of the informal resolution meeting.*

*Violation of the policy will be treated as a civil and not criminal matter.*

- *How will residents be notified about the changes in the lease for the no-smoking policy?*

*NYCHA has mailed a lease addendum containing smoke-free provisions to all residents. New residents sign a lease containing smoke-free provisions. Prior to mailing the lease addendum, NYCHA posted a notice of the planned lease change in all buildings. NYCHA also discussed the lease changes during Smoke-Free NYCHA engagement with residents. During the first quarter of 2018 NYCHA:*

1. *Convened 22 Smoke-Free NYCHA “Community Conversations” that engaged residents at 103 developments*
2. *In partnership with the Health Department, worked with partner Green City Force to engage over 2,000 residents in on-site outreach*
3. *Shared Smoke-Free NYCHA educational information during door-to-door outreach to over 3,000 senior residents.*

*Information on the lease change is also included in Smoke-Free NYCHA fact sheets, available online and in Property Management offices.*

- Does the no-smoking policy apply to marijuana? Has NYCHA determined how to address the issues of having medical marijuana and non-medical marijuana in NYCHA developments? While it is illegal, how will NYCHA enforce that residents are not allowed to have it in their homes?

*In accordance with HUD guidance and regulations, NYCHA’s smoke-free policy was created to prohibit the use of tobacco products. Regarding marijuana, no combustible forms of marijuana are currently legal in New York City or New York State and marijuana is an illegal controlled substance under federal law. In response to resident and staff feedback NYCHA is exploring additional opportunities to reduce exposure to secondhand marijuana smoke.*

- Who will be responsible for approaching people who are smoking within the 25-foot perimeter of the NYCHA buildings?

*NYCHA staff observing violations will report them to the Property Management office. Residents may report violations by calling the Customer Contact Center or notifying the Property Management office and providing details of the violation. Property management staff will not be able to identify every violation of this policy. Failure to enforce any part of this policy does not negate NYCHA’s right to enforce the lease and policy at any future time.*

- What steps can NYCHA take to prevent smoke from traveling between one room to another and one floor to another?

*Secondhand smoke can travel through cracks, ventilation systems and windows. NYCHA will continue to seek new resources for maintenance, repair, and capital upgrades to secure our public housing resources for the next generation of New Yorkers. However, as HUD explains, the best way to help mitigate the impacts of secondhand smoke is to adopt a smoke-free policy. As HUD states: “ventilation and other air filtration technologies cannot eliminate all the health risks caused by secondhand smoke exposure. Smoke-free policies are the only way to prevent exposure to secondhand smoke in multifamily units.” See HUD Guidebook entitled Implementing HUD’s Smoke-Free Policy in Public Housing, at page 5.*

*NYCHA’s smoke-free policy will help eliminate smoking indoors and close to buildings. In addition, Smoke-Free NYCHA is working with resident leaders and partners to build solid, gradual change, improving air quality across NYCHA developments.*

- Will NYCHA be updating the ventilation in apartments to help prevent smoke from traveling between apartments and coming from electrical outlets?

*NYCHA agrees that upgrading ventilation systems is one of many needs of our aging housing stock. NYCHA will continue to seek new resources for maintenance, repair, and capital upgrades to secure our public housing resources for the next generation of New Yorkers.*

*However, as HUD explains, the best way to help mitigate the impacts of secondhand smoke is to adopt a smoke-free policy. As HUD states: “ventilation and other air filtration technologies cannot eliminate all the health risks caused by secondhand smoke exposure. Smoke-free policies are the only way to prevent exposure to secondhand smoke in multifamily units.” See HUD Guidebook entitled Implementing HUD’s Smoke-Free Policy in Public Housing, at page 5.*

- Will NYCHA be creating designating smoking spots outside of the 25-foot perimeter?

*NYCHA is not currently planning to create designated smoking areas.*

- How will NYCHA’s no smoking policy be discussed on Family Days?

*In 2017, over 1,500 residents at 54 NYCHA developments participated in Smoke-Free NYCHA Family Day interactive activities. During the first quarter of 2018 NYCHA:*

- 1. Convened 22 Smoke-Free NYCHA “Community Conversations” that engaged residents at 103 developments*
- 2. In partnership with the Health Department, worked with partner Green City Force to engage over 2,000 residents in on-site outreach*
- 3. Shared Smoke-Free NYCHA educational information during door-to-door outreach to over 3,000 senior residents.*

*NYCHA will continue to work collaboratively to develop strategies and resources to educate residents about the health risks of exposure to secondhand smoke and to connect residents to cessation services for those who want to quit. Information on the policy and available resources will be shared as part of 2018 Family Day engagement.*

- Will local PSAs be involved with telling people they are not allowed to smoke within the 25-foot perimeter of NYCHA buildings?

*Smoking in prohibited areas is a violation of the lease. It is not a criminal matter. The role of local PSAs regarding NYCHA’s smoke-free policy is currently under discussion.*

- How will NYCHA stop people from smoking in apartments and stairwells? Smoking in public places contaminate the hallways.

*NYCHA’s smoke-free policy prohibits the smoking of tobacco products in apartments, stairwells and hallways, among other areas. NYCHA is using a graduated enforcement approach to address violations of the smoke-free policy. Graduated enforcement means NYCHA will respond to violations with escalated warnings and specific, progressive enforcement remedies while also connecting residents to resources. The details of NYCHA’s graduated enforcement approach is explained in detail above in response to another comment. NYCHA staff observing violations will be able to report them to the Property*



*Management office and NYCHA residents will be able to report all violations by calling the Customer Contact Center or notifying the Property Management office.*

- A RAB member stated they believe it is unfair to force residents and staff to report people violating the no-smoking policy.

*Residents are not required to report violations of the smoke-free policy. NYCHA has established the ability for residents to report to enable NYCHA to be responsive to resident concerns about adherence to the smoke-free policy. NYCHA staff are instructed to report violations to the Property Management office.*

*Although residents are not required to report violations to Property Management, it is the responsibility of residents to inform their guests and visitors of the smoke-free policy and to ensure guests and visitors do not violate the policy. Residents are accountable for their own violations of the policy, as well as violations of their guests and visitors.*

- Will NYCHA be using air monitors to detect if someone has been smoking?

*NYCHA will not be installing air monitors to detect smoke at any NYCHA developments for enforcement-related purposes.*

- Several RAB members stated it is dangerous to expect residents to report other residents for violating the no-smoking policy.

*Residents are not required to report on other residents' behavior but may report smoking in prohibited areas if they wish. NYCHA's policy is designed to facilitate residents supporting the health of their family members and other residents.*

- Will there be any investment from New York State to help fund NYCHA's implementation of the no-smoking policy?

*NYCHA has not received any direct financial investment from New York State to help fund the implementation of this policy.*

- What types of smoking cessation resources are available?

*The following available resources are being promoted via educational materials developed by the NYC Health Department:*

1. *Talk to your doctor about your medication and counseling options.*
  - a. *Health insurance, including Medicaid, may cover services to help you quit.*
2. *Get a free starter kit of quit-smoking medications or talk to a quit coach.*
  - a. *Visit [nysmokefree.com](http://nysmokefree.com)*
  - b. *Call 1-866-NY-QUITS (1-866-697-8487) or 311*
3. *Connect to other resources.*
  - a. *Visit [nyc.gov](http://nyc.gov) and search "NYC Quits."*
  - b. *Download the new NYC HelpMeQuit app from Apple or Google Play stores.*

*The New York City Health Department also developed customized educational materials for Smoke-Free NYCHA, facilitated a training of community health workers, and is leading*

*smoking cessation support groups in select developments. NYCHA is working with the Health Department and other partners to develop additional cessation resources. In addition, the Smoke-Free NYCHA web page was launched in January 2018 and features fact sheets, public notices, links to critical information, and other resources. NYCHA will work to advance Smoke-Free NYCHA implementation in alignment with other agency initiatives to achieve safe, clean, and connected communities.*

- What will happen if a NYCHA resident is smoking on a city sidewalk outside of the NYCHA campus that is within the 25-foot perimeter of the NYCHA building?

*The smoke-free policy applies only within NYCHA's property boundaries. The smoke free policy only applies to smoking on NYCHA property.*

- NYCHA should sit down with CCOP district chairs and resident associations and boards to discuss the implementation of the no-smoking policy so that resident leaders can help their residents learn about the new policies and procedures.

*Partnership with residents and external partners has been a cornerstone of Smoke-Free NYCHA. NYCHA's Department of Health Initiatives works with CCOP chairs and other resident leaders to respond to opportunities for residents to become involved in implementation. To contact Health Initiatives please email [smoke-free@nycha.nyc.gov](mailto:smoke-free@nycha.nyc.gov) or (212) 306-8282.*

- NYCHA needs to get the CCOP and the RAB involved with their partnerships on the no-smoking policy.

*NYCHA welcomes partnership with CCOP and RAB on this and other healthy housing topics.*

- How will the evaluation of the no-smoking policy be conducted? Will resident leaders be notified of how the evaluation is going and what the findings are?

*NYU Langone Health will conduct a study to evaluate the impact of the new smoke-free policy on secondhand smoke (SHS) exposure and health outcomes in NYCHA residents as well as examine implementation of the smoke-free policy. Findings will inform strategies for optimizing implementation and impact in NYCHA and public housing authorities nationally. Resident leaders at developments selected to participate in an evaluation have been notified.*

*In addition to NYU's research, the NYC Health Department will conduct a citywide phone survey of NYCHA residents to evaluate NYCHA's smoke-free policy. NYCHA will facilitate the sharing of results from the Health Department survey with the RAB and/or CCOP.*

- What will NYCHA do to make sure that retailers are not selling cigarettes on NYCHA campuses?

*Retail sales of tobacco products are not addressed in NYCHA's smoke-free policy, but NYC has passed new laws that restrict retail sales. On August 28, 2017, New York City Mayor Bill de Blasio signed into law a package of tobacco legislation, which included a cap on the number of tobacco retail outlets in each of the 59 community districts. This new law will reduce the number of tobacco retailers in all NYC neighborhoods.*

*Residents interested in retail-based tobacco control strategies are also encouraged to contact NYC Smoke-Free at 646-619-6400 or: [nycsmokefree@healthsolutions.org](mailto:nycsmokefree@healthsolutions.org).*

- A RAB member recommended if residents are having issues with people smoking in public places in the building, they should contact their NCO for assistance.

*NYCHA's smoke-free policy provides a process for residents and staff to report violations. Residents may report violations by calling the Customer Contact Center or notifying the Property Management office and providing details of the violation.*

- Will NYCHA upgrade ventilation systems or install new ventilation because of the smoke-free policy?

*NYCHA agrees that upgrading ventilation systems is one of many needs of our aging housing stock. NYCHA will continue to seek new resources for maintenance, repair, and capital upgrades to secure our public housing resources for the next generation of New Yorkers.*

*However, as HUD explains, the best way to help mitigate the impacts of secondhand smoke is to adopt a smoke-free policy. As HUD states: "ventilation and other air filtration technologies cannot eliminate all the health risks caused by secondhand smoke exposure. Smoke-free policies are the only way to prevent exposure to secondhand smoke in multifamily units." See HUD Guidebook entitled Implementing HUD's Smoke-Free Policy in Public Housing, at page 5.*

- A RAB member wants to know about the repercussion for residents who burn frankincense oil for religious observance. How are they affected with the smoke free ban?

*Burning frankincense oil is not covered in the smoke-free policy.*

- A RAB member recommends the graduated enforcement of the smoke free policy.

*NYCHA agrees with this recommendation and has incorporated a graduated and escalated approach in enforcing the smoke-free policy.*

- The Dallas Housing Authority installed gazebos where smokers can smoke. Will NYCHA eventually construct any similar designated smoking areas?

*NYCHA is not currently planning to create designated smoking areas. If financial resources were provided to create designated smoking areas NYCHA would consider the opportunity.*

- Is NYCHA working with the American Lung Association and other associations for the development of cessation programs? When will cessation programs be implemented?

*NYCHA continues to engage partners to discuss opportunities to advance smoking cessation programs. The NYCHA Journal recently highlighted the American Lung Association Freedom From Smoking cessation support groups offered by the Harlem Health Advocacy Partners (HHAP) Program. NYCHA is in discussions with other partners interested in providing individual and group level support to residents who smoke and want to quit.*

*NYCHA also worked with the NYC Department of Health to develop customized Smoke-Free NYCHA palm cards that provide comprehensive information on available cessation support. The article from the NYCHA Journal is available here: <https://www.nychajournal.nyc/quit-smoking-it-takes-village>*

- NYCHA needs to explain why residents are receiving termination letters if they do not complete the smoking policy lease addendum.

*NYCHA has not sent termination letters to residents based on a failure to sign the lease addendum containing the smoke-free policy provisions.*

- What will happen to NYCHA employees who are smoking when the smoke free policy is in effect?

*NYCHA is promoting employee adherence to the policy through staff training, employee communication and other means. NYCHA is also amending the Human Resources manual to reflect the new policy and staff that violate the policy may be subject to disciplinary action.*

### **Other Comments**

- How do we build a relationship with NYCHA when NYCHA does not care about our concerns?

*NYCHA is interested in engaging all residents. As part of Next Generation NYCHA, NYCHA has committed to forming resident associations at those developments without a resident association. Moreover, NYCHA uses various forums, including the NYCHA Journal and the NYCHA website to provide information to residents. Further, NYCHA staff host meetings throughout the developments to inform residents of current matters and concerns. Please advise NYCHA of any specific resident concerns you feel have not been addressed.*

- Should NYCHA start to ask other countries for assistance with America's poor who live in NYCHA?

*The City of New York offers many forms of assistance to low-income New Yorkers including NYCHA residents. For instance, the Human Resources Administration (HRA) provides food stamps and rental payment assistance NYCHA also works in collaboration with many other city agencies, including the NYC Department for the Aging, and NYC Department for Youth and Community Development, to provide supportive services to NYCHA residents.*

*NYCHA's Office of Resident Economic Empowerment & Sustainability (REES) supports residents to increase their income and assets through programs, policies and collaborations in the areas of: employment and career advancement, adult education and vocational training, financial empowerment and resident business development. REES offers a wide array of services through partnerships and collaborations with local and citywide organizations that provide job readiness and vocational training services. Some of REES's partners focus their services specifically for young adults ages 18-24. Examples include: Green City Force, an AmeriCorps program that provides a stipend to NYCHA young adults while they engage in training in either an energy or urban farms track, and Opportunities for a Better Tomorrow (OBT), a nonprofit with several programs throughout the city that*

*provides young adults with combined high school equivalency and vocational training classes. For more information on REES and its youth focused partners please visit [www.OpportunityNYCHA.org](http://www.OpportunityNYCHA.org) or call the REES Hotline at 718-289-8100.*

- A RAB member suggests a section about “governance” to be included in the Annual Plan regarding 24CFR964.

*NYCHA will take this recommendation under advisement.*

## ATTACHMENT N

### COMMENTS FROM THE PUBLIC ON THE FY19 ANNUAL PHA PLAN

#### Capital Improvements

- NYCHA should immediately release a plan to upgrade its boiler systems for inclusion in the final FY2019 Annual Plan to be submitted to HUD.

*Currently, NYCHA's 2018-2022 Capital Plan is available online here:*

<https://www1.nyc.gov/assets/nycha/downloads/pdf/capital-plan-narrative-2018.pdf>

*This Plan includes a summary of how \$200M in funding provided by the Mayor will address heating issues at 20 developments impacting approximately 45,000 residents. Under this plan, 39 boilers will be installed at 10 developments to alleviate outages.*

- NYCHA needs to do something about the boilers at Dyckman Houses and Marble Hill Houses.

*Dyckman Houses is included in the 2018-2022 Federal Capital Plan to receive \$10.5M to implement full heating plant replacement across all buildings within the development. Design for this work is underway as of July 2018.*

*Marble Hill Houses was included in NYCHA's \$250M proposal to the State to receive \$20M to implement heating plant upgrades. Further planning awaits the release of funds from the State.*

- Saint Nicholas is in dire need of plumbing and repairs. In May 2018, water was cut off for 4 days due to an electrical explosion.

*There was no electrical explosion at Saint Nicholas. The building experienced low water pressure for several days in May 2018 due to issues in the kitchens in lines B and C at 2406 8<sup>th</sup> Avenue. NYCHA is aware of the need for plumbing upgrades at the development.*

- The lobby doors are broken and even though Saint Nicholas is part of the MAP program, there are no intercoms and the elevator door drags. When will the lobby doors at Saint Nicholas be replaced?

*Saint Nicholas Houses recently had lobby doors and key fobs installed. If a resident notices that a door has been vandalized, the resident should call the Customer Contact Center at 718-707-7771. If a key fob does not work, the resident should notify property management.*

- The Harborview Terrace and Corsi Houses community rooms are in complete disarray and should be repaired.

*The community center at Corsi Houses (the LaGuardia Community Center), is slated for two projects under city funding. In 2019, an upgrade to the community center is planned for \$4.068 million. A \$300,000 project for renovating the grounds for the sitting area for seniors at the LaGuardia Community Center is currently in the Procurement phase.*

*At Harborview Terrace Senior Center, there are upgrades currently underway on a \$2.056 million project that is projected to be completed by late December 2018.*

- The windows at PS 139 need to be repaired.

*NYCHA will take this recommendation under advisement. This past May, NYCHA installed new window balances in 121 of the 125 apartments in PS 139.*

- Why was the boiler replacement at Soundview Houses removed from the Capital Plan?

*Soundview is included in the 2018-2022 Federal Capital Plan to receive \$10.9M to implement a full heating plant replacement across all buildings within the development. Design for this work is underway and the projected completion date is by the end of 2021. This development is also slated to receive additional funding under the Mayor's \$200M investment toward heating upgrades at NYCHA developments.*

- Why has scaffolding been in place for 3 years at Fulton Houses?

*Sheds were up to protect the public until NYCHA could perform facade and roof repairs. Façade repairs have been completed at two buildings, but NYCHA is also performing roof work at some of the buildings. New York City's Department of Buildings will not allow NYCHA to remove the sheds until all the construction, including roof work, is completed at each building.*

- There is a water problem at Castle Hill Houses where some apartments have no water and other apartments have water coming out of the ground.

*The water issue at Castle Hill was resolved following repairs made to the house pumps in April 2018.*

- NYCHA needs to clarify where the money went at Van Dyke Houses. NYCHA was supposed to get \$56 million and Van Dyke Houses only received \$1.8 million for the parking lots.

*Van Dyke was included in NYCHA's \$250M proposal to the State to receive \$24M to implement heating plant upgrades. Further planning awaits the release of funds from the State.*

- NYCHA needs to explain the roof work and plastic on the roofs at Smith Houses.

*Roof work was completed at buildings 1, 2, 4 and 5 at Smith Houses as of December 2017.*

- NYCHA does not currently include an arborist to oversee the protection of trees within NYCHA properties while construction takes place. Specifically, resiliency projects at Smith Houses have been underway for months now without an adequate plan in place to protect the trees. Residents are concerned about the future of the trees given that some of them may have been damaged due to construction. NYCHA should take a more aggressive approach to safeguard Smith's trees and explore the possibility of employing an arborist.

*NYCHA has retained an arborist for this project. The arborist has completed a substantive report that has been shared with the concerned parties and NYCHA is awaiting a walkthrough of the site to go tree by tree on the recommended remediation and mitigation*

efforts for each tree. NYCHA has had a tree protection plan in place for the entirety of the contract and has accepted further recommendations from the concerned parties that have been implemented on the project.

- Resident leaders at Smith Houses and Two Bridges are concerned about communication and lack of engagement with tenants during repairs. Construction disrupts the quality of life for residents and NYCHA should place a greater emphasis on communicating with tenants during construction.

*Because of NYCHA's historic \$3billion grant for Superstorm Sandy Recovery, NYCHA created a specific Sandy Community Outreach team composed of 20 individuals, of which half are NYCHA residents. This team attends meetings, provides project updates, canvasses the developments, acts as a liaison between residents and the contractors, alerts residents of critical information related to construction impacts, and keeps the community at large informed. Every week the team calls each Resident Association (RA) president of each Sandy impacted development and attends every RA meeting monthly.*

*At Smith Houses, the team has made over 7,315 phone calls to residents concerning the project, posted over 10,850 flyers in relation to construction, impacts to residents, or career opportunities and attended or presented at 141 community meetings/events. At Two Bridges, the team has made over 1,780 phone calls to residents concerning the project, posted over 1,287 flyers in relation to construction, impacts to residents, or career opportunities, and attended or presented at 98 community meetings/events.*

*For further information, visit the Sandy Recovery webpage at: <https://www1.nyc.gov/site/nycha/about/recovery-resiliency.page>, or reach out to the team directly: at [disaster.recovery@nycha.nyc.gov](mailto:disaster.recovery@nycha.nyc.gov) or 212-306-8532.*

## **Financial Resources**

- There is a serious problem with flat rent/ceiling rent.

*Federal law requires all housing authorities to set flat rent at a minimum of 80% of the fair market rent. Please see pages 46-47 for NYCHA's flat rent schedule for FY 2019.*

## **Operation and Management**

- NYCHA's hotline number is inefficient due to extended wait times, undependable intake, and tickets that expire due to scheduling problems.

*The Customer Contact Center (CCC/Hotline number) strives to serve our customers by improving the quality of their homes and lives. NYCHA promotes this policy in every interaction with our customers in an informative, courteous and professional service manner. The CCC offers multiple options to address the service needs of our customers. NYCHA has well trained Customer Service Representatives and Supervisors available live 24 hours a day and 7 days per week.*

*NYCHA's Customer Service Representatives interact with our customers to identify their service and informational needs and then work to address those concerns by seeking possible solutions that may include scheduling a maintenance service appointment and/or*



*emergency response. Customer Service Representatives also directs residents to useful information on the NYCHA website and guide the public to the self-service portal.*

*From the beginning of 2018 through June 15, 2018, the CCC has served an average of 9,200 customers per day in Maintenance, Applications and Leased Housing with an average speed to answer each call at the rate of 1 minutes and 49 seconds. Although wait times may vary on any given day, high call volume, inclement weather, staffing needs and mandatory training contribute to our service delivery.*

*NYCHA's CCC Quality Assurance Team monitors customer interactions with the representatives for quality assurance and training purposes. Representatives meet with supervisors and review work performance, policies and procedures twice monthly. Training is core to ensure quality customer service and satisfaction. Comments (good and bad) from callers are passed along to representatives as part of their uptraining.*

*Regarding scheduling, the CCC creates work order tickets through the options mentioned above. They are opened based on the information that the CCC Customer Service Representative receives by the customer and/or available online options and then forwarded immediately to the appropriate management office of the customer's residence. The CCC only creates scheduled work order tickets based on the developments maintenance staff availability that is provided in our database. The assignment of Maintenance staff is local management based. The CCC does not assign the staff nor does the CCC close a ticket.*

*Once management verifies and completes a repair, management places notes on the ticket and closes it. If an appointment is missed or the caller is dissatisfied, the CCC will inform the residents' management office of their concerns and request their review and resolution.*

- A resident of Campos Plaza I is concerned about NYCHA Emergency Services vehicles driving on the sidewalks.

*NYCHA's Emergency Services department has reminded and will continue to remind staff that outside of an extreme emergency or necessity, vehicles should not be driven on sidewalks.*

- NYCHA needs to take the "Ocean Bay" off of the Ocean Bay (Oceanside) property. When research is done, little to no information can be found about Oceanside because NYCHA calls the property Ocean Bay (Oceanside).

*Residents of Ocean Bay (Oceanside) can contact NYCHA's Department of Communications if they would like to change the name of their development.*

- NYCHA needs to reconsider the permanent exclusion policy. It is unjust and unfairly targets minority residents.

*NYCHA will take this comment under advisement. NYCHA recently changed the form residents can submit to the hearing office to ask that permanent exclusion be lifted. The form explains the process and includes information on how a resident can demonstrate that permanent exclusion should be lifted. Because a hearing officer can grant an application to lift permanent exclusion, it may not be "permanent."*

*For more information on permanent exclusion, please see the following links on NYCHA's website. FAQs are available here:*

*<http://www1.nyc.gov/site/nycha/residents/permanent-exclusion-faq.page> and the Application to lift is here: <http://www1.nyc.gov/assets/nycha/downloads/pdf/permanent-exclusion-lift-application-instructions-032018.pdf>*

- Why haven't tenants gotten the new 30-inch stoves at all developments?

*The 30-inch stoves do not fit into the kitchens of all NYCHA apartments.*

- NYCHA should notify all NYCHA staff with a point of contact as to where the handicapped entrance is located at each development.

*NYCHA will consider this recommendation and will work to find ways to make it clear to staff and residents where the accessible entryways are located.*

- NYCHA should immediately conduct a study of its property management operations toward development a staged plan for reforms. Such a plan would require bringing together key stakeholders to gain consensus for moving forward.

*NYCHA is reviewing its property management operations to improve overall customer service, response times, transparency, quality of work performed, and compliance.*

- Why are residents of Castle Hill Houses with brackets in their windows being sent to report to NYCHA's Central Offices and being told the brackets are not installed properly?

*As of September 2018, any air conditioner brackets with deficiencies at various NYCHA developments, including Castle Hill Houses, are in the process of being identified and corrected. Households who had an air conditioner bracket with a deficiency were given an appliance agreement form to fill out and return to the management office. Residents were not told to report to NYCHA's central office for air conditioner bracket deficiencies.*

- NYCHA's responses to questions regarding issues with chronic heat and hot water problems, pest management problems, and management of garbage should be consistent with NYCHA's Sustainability Plan.

*NYCHA's Sustainability Plan highlights each of these issues and is available here: <https://www1.nyc.gov/site/nycha/about/sustainability-2018.page>.*

- NYCHA should immediately release its plan to carry out the required testing for toxic lead paint poisoning for inclusion in the final FY2019 Annual Plan to be submitted to HUD. Consideration should be given to whether the inspection plan constitutes a significant amendment that requires 45-days public notice and a public hearing.

*NYCHA signed a consent decree with United States Attorney's Office for the Southern District of New York (SDNY) on June 11, 2018 and the consent decree awaits approval by the Court. Consistent with the requirements of the Consent Order, NYCHA will work collaboratively with the monitor, once appointed, to draft action plans in each area required. At that time, consideration will be given as to whether the action plans constitute a significant amendment.*

- The day care at Saint Nicholas housing should be tested for lead in the water.

*New York City's Health Department is responsible for conducting lead testing at day care facilities. Information about the testing results is available on the NYC Childcare Connect portal, accessible here: <https://a816-healthpsi.nyc.gov/ChildCare/ChildCareList.do>. The results for the day care at Saint Nicholas houses, Utopia Children's Center, Inc., are available and state that the water lead test has been completed at this facility.*

- When a resident submits a ticket or calls about a ticket, why does the ticket not appear on the MyNYCHA App?

*The MyNYCHA app will show all open apartment tickets as well as all apartment tickets closed or cancelled in the last 6 months. If a resident is having any issues with the myNYCHA app, there are a few ways to report a technical issue: 1) Report the details within the "Feedback" section, from the Main Menu, 2) Email us at [mynycha@nychanyc.gov](mailto:mynycha@nychanyc.gov) or 3) call the Customer Contact Center at [\(718\) 707-7771](tel:7187077771).*

- Why did NYCHA decide to spend money on installing MyNYCHA kiosks or converting the annual recertification process to electronic instead of spending the money on other things?

*Moving the annual recertification process from an inefficient paper-based process to the internet has been a huge time saver for both NYCHA staff and tenants.*

*The deployment of kiosks has helped with the adoption of internet-based, time saving initiatives such as online annual recertification, rent payment, and MYNYCHA Work Order processing. The kiosks also help bridge the digital-divide by allowing internet access to other government websites and services.*

- How do you get a resident parking sticker at Cypress Hill?

*To obtain a resident parking sticker at any NYCHA development, a parking application must be completed, which can be done on-line or mailed to LAZ Parking, PO Box 2690, NY, NY 10108. The automobile's registration address must conform with the resident's development address to receive the residents' rate.*

- A glitch in the system is overcharging residents' rent.

*NYCHA utilizes HUD-approved methodologies to calculate rent. NYCHA needs specific examples to identify if an overcharge occurred. Tenants may request to review their rent calculation with the property management staff. Additionally, tenants may use the grievance process for further review of their rent concerns.*

- NYCHA needs to clarify what earned income disallowance is.

*Earned Income Disallowance (EID) is a special allowance that allows Public Housing tenants to earn income and temporarily have all or part of the additional income excluded from their annual income so that it does not produce a rent increase. The disallowance occurs after an EID qualifying event, such as a transition from unemployment to employment, from welfare to work, or when additional income is earned during participation in an economic self-sufficiency or job training program.*

*During the initial EID 12-month exclusion period, the full amount (100%) of increased income attributable to employment or increased earnings is excluded for purposes of calculating the household's rent. The initial full exclusion period begins on the 1st of the month after the household member who qualifies becomes employed or first experiences an increase in income due to employment. The initial full exclusion extends for a total of 12 consecutive months. For the next 12 consecutive months, 50% of the earned income is considered in calculating rent.*

*EID ends after 24 months. The 24-month period will not stop if employment ends or if income declines. However, if employment is subsequently regained or income increases, the EID would again be available during the remainder of the 24-month period.*

*After the 24-month period ends, an individual will no longer be eligible for an EID in the future.*

- NYCHA's community service policy violates constitutional rights.

*Community service for public housing residents is required under federal law. Please note, however, that some residents are exempt from community service requirements. Also, NYCHA residents may fulfill community service requirements in a variety of ways. Please see <https://www1.nyc.gov/site/nycha/residents/policies-and-procedures.page> for more details.*

### **RAD, Section 18 Demolition/Disposition and PACT Program for Unfunded Units**

- Residents of Williams Plaza and Independence Towers do not want to be rushed to place a hold on the RFP from NYCHA until a legal and detailed Memorandum of Understanding (MOU) is in place concerning the rights of the residents of both developments, describing the benefits that will come with the conversion, and detailing the guidelines and the changes that will be a byproduct of this conversion.

*NYCHA will take this recommendation under advisement. Regarding the Memorandum of Understanding (MOU), it is NYCHA's understanding that residents would like to follow the MOU model that Baltimore public housing residents adopted during their Rental Assistance Demonstration (RAD) conversion process. Please note that that MOU was executed between the residents and the new property manager – not the public housing authority. It is also NYCHA's understanding that the RAD Roundtable is working on a similar MOU to be executed in New York City for the Permanent Affordability Commitment Together (PACT)-RAD conversions. NYCHA welcomes having a similar MOU for the PACT-Unfunded Units conversions (which include Independence and Williams Plaza) and will wait for the Roundtable to issue one.*

- NYCHA needs to record the PACT Roundtable Guiding Principles on Resident Rights Memorandum of Understanding (MOU), laying out an agreement with residents concerning the work to be done and the community benefits that will come with conversion, as well as protections with HUD so that they become part of all the blended conversion transactions conducted under the PACT program.

*NYCHA will take this recommendation under advisement and needs to coordinate with the Roundtable since the Guiding Principles belong to them and do not belong to NYCHA.*

- The residents of Williams Plaza and Independence Towers Houses are requesting a Physical Need Assessment (PNA) to ascertain the needs of both developments.

*The Physical Needs Assessments (PNAs) are an exhibit to the Request for Proposal (RFP). Information on the results of the recent PNA for NYCHA can be found online:*

<https://www1.nyc.gov/assets/nycha/downloads/pdf/PNA%202017.pdf>

[https://www1.nyc.gov/assets/nycha/downloads/pdf/2017%20PNA\\_Development.pdf](https://www1.nyc.gov/assets/nycha/downloads/pdf/2017%20PNA_Development.pdf)

- To prevent arbitrary rent increase at Williams Plaza Houses and Independence Towers, will rents in the converted developments be subject to rent regulation under existing rent stabilization laws?

*As long as the unit is under a Section 8 Housing Assistance Payment (HAP) Contract, rent stabilization should not determine the amount of rent the resident will pay. Regardless of the contract rent, families will generally continue to pay 30 percent of their adjusted gross income.*

- Residents of developments undergoing conversions in the Unfunded Units program, such as Williams Plaza and Independence Towers, need more assurance, clarity, and transparency on how the program will operate.

*In July 2017, NYCHA had our first meeting with resident leaders from the seven developments in NYCHA's PACT-Unfunded Units portfolio. During our meeting, NYCHA discussed how entering the PACT program would potentially impact residents and their neighbors, answered questions about resident rights, and provided project timelines.*

*In March 2018, NYCHA met with resident leaders, elected officials, and community leaders to kick off the PACT conversions at Williams Plaza and Independence Towers. As of June 2018, NYCHA has had one general resident meeting thus far and will continue to host meetings to discuss the process with residents where NYCHA can receive feedback. In summer 2018, NYCHA will be scheduling site visits with RFP respondents to walk the developments and gather a clearer understanding of the physical needs of the buildings.*

*NYCHA anticipates that a development partner will be selected in the fall of 2018. At that time, the development partner will join NYCHA with the resident engagement process and will co-host all meetings. Topics to be covered include the property management transition, job opportunities, social service needs, and the rehab scope of work, for which NYCHA will need resident input to finalize. NYCHA is excited to work with residents to achieve a true transformation at these developments that will address capital, operational, and social service delivery gaps.*

- Under PACT, what will happen if a resident decides that he/she does not want to become a project-based Section 8 voucher holder? Would the resident be given the option to stay living in Williams Plaza and Independence Towers developments or transfer to another public housing development?

*This is a mandatory conversion for all residents of Independence Towers and Williams Plaza to Section 8 if they have not done so already. Please note that the federal government does not provide direct capital and operating funding for these units, which thus creates a multi-million-dollar annual operating deficit. Any resident who wishes to remain in the public housing program may request a transfer, but the transfer must be for a valid reason, such as that the apartment is uninhabitable due to a fire or flood, the tenant has a special need due to a disability, or the apartment is under- or over-occupied. There are currently more than 264,000 families on NYCHA's public housing waitlist, of which more than 12,600 families are awaiting a transfer.*

*Once a family converts to Section 8, the only way for them to re-enter the public housing system is to re-apply and be put on the public housing waitlist. However, one year after conversion to project-based Section 8, every family will be eligible to apply for a Section 8 tenant-based voucher to move to private housing, subject funding availability for such vouchers. Tenants will also have the ability to utilize the portability option to transfer outside of New York City to anywhere in the United States, including Alaska, Hawaii, and Puerto Rico, where tenant-based vouchers are accepted.*

- Under PACT, what will happen to residents with excess income that won't qualify for project-based Section 8 if they remain living at Williams Plaza? Some residents at Williams Plaza have total annual incomes higher than 80% of the area median income. Will their rent become 50% of the area median income or will their rent be 30% of their gross income?

*If at the time of conversion a household's income exceeds 80 percent of Area Median Income (AMI), the family will generally still pay 30 percent of their adjusted gross income towards rent, the apartment will not be added to the Section 8 HAP contract, and no subsidy will be provided.*

- Under PACT, if a resident decides to accept the project-based Section 8 voucher and then after one year decides that the program is not good for their family, can the family reject the project-based Section 8 voucher and move to a public housing building?

*Once a family converts to Section 8, the only way for them to re-enter the public housing system is to re-apply and be put on the public housing waitlist. One year after conversion to project-based Section 8, every family will be eligible to apply for a Section 8 tenant-based voucher to move to private housing, subject to funding. Tenants will also have the ability to utilize the portability option to transfer outside of New York City to anywhere in the United States, including Alaska, Hawaii, and Puerto Rico, where tenant-based vouchers are accepted.*

- Under PACT, are the occupancy standards for project-based Section 8 the same as for tenant-based Section 8 or public housing?

*Public housing occupancy standards will remain in effect for existing residents after conversion. However, the Section 8 occupancy standards will apply to new applicants who rent vacant units at the developments post-conversion.*

- What explicit commitments is NYCHA making to residents regarding ongoing rights and protections of Williams Plaza Houses and Independence Towers? There is no parallel infrastructure of regulations or guidance for the proposed conversion of the unfunded units.

Several questions emerge: The PACT should come with a set of required resident protections and guideline principles:

- Including the right to stay without further screening,
- The right to return if relocation is necessary,
- The right to organize, and continued funding of tenant participation activities.
- Will overcrowded, or severely overcrowded families be given priority to transfer to the correct size apartment?
- Residents have the option to request reasonable accommodations for medical reasons?
- If a family income increases and they stop receiving subsidy for the apartment, will the subsidy be given back if the income decreases in the future?
- How will under-occupied and severely under-occupied residents who are seniors and/or disabled will be affected after the PACT conversion and under the project-based Section 8? Will they be forced to downsize?
- To enhance resident rights, NYCHA encouraged the formation of the PACT Roundtable on Resident Rights and Protections – resident leaders, housing advocates, to augment federal laws and regulations by developing ‘guideline principles’ to be observed by NYCHA and the PACT developers in Independence Towers and Williams Plaza Houses conversions.
- HUD Part 964 Tenant Participation regulations governing the formation of a duly-elected resident organization, and its recognition by the new owner as the sole organization representing residents, need to be continued and incorporated.
- Appropriate HUD and OSHA environmental regulations need to be adopted to protect residents from environmental hazards during renovations.
- NYCHA PACT guidelines should also encourage the new owner to agree to a Memorandum of Understanding (MOU), laying out an agreement with residents concerning the work to be done and the community benefits that will come with conversion.
- Smaller, scattered site developments undergoing RAD conversion may not have sufficient TPA resources to provide the technical assistance they need. Special allocations of TPA or other funds should be made available to meet their needs.
- Residents in PACT-converted developments should be assured of continued access to central NYCHA services, such as job programs.
- NYCHA needs to record the PACT Roundtable Guiding Principles on Resident Rights Memorandum of Understanding (MOU), laying out an agreement with residents concerning the work to be done and the community benefits that will come with conversion. And protection with HUD so that they become part of all the blended conversion transactions conducted under the PACT program.
- The converted buildings should be placed under rent stabilization.
- NYCHA should adopt the PACT infrastructure – federal laws and regulations, as well as local guideline principles – as applicable to the eight designated developments undergoing conversion of unfunded units.

*The purpose of the PACT initiative is to protect residents’ rights while stabilizing the developments financially to facilitate extensive rehabilitation work, and to keep the property permanently affordable. In summary, this means that residents:*

- *Have the right to stay in the development without further rescreening;*

- *Have the right to return if relocation is necessary, although the conversion will involve only tenant-in-place rehabilitation work and no relocation is contemplated to take place;*
- *Have the right to organize and continue to receive funding for tenant participation activities from the property management budget;*
- *Retain the right to a hearing to resolve grievances;*
- *Be protected under the RAD Roundtable Guiding Principles; and*
- *Generally pay no more than 30 percent of adjusted gross income towards their rent.*

*Further details about resident rights are as follows:*

- *All residents will generally be required to pay no more than 30 percent of their adjusted gross income toward rent.*
  - *As long as the unit is under a Section 8 Housing Assistance Payment (HAP) Contract, rent stabilization should not determine the amount of rent the resident will pay. Regardless of the contract rent, families will generally continue to pay 30 percent of their adjusted gross income.*
  - *If at the time of conversion a household's income exceeds 80 percent of Area Median Income (AMI), the family will generally still pay 30 percent of their adjusted gross income towards rent, the apartment will not be added to the Section 8 HAP contract, and no subsidy will be provided.*
- *Public housing occupancy standards will remain in effect for existing residents after conversion. However, the Section 8 occupancy standards will apply to new applicants who rent vacant units at the developments post-conversion.*
- *Succession rights for public housing residents will be grandfathered in, but only for authorized household members with permanent status.*
  - *Authorized household members with permanent status may claim remaining family member rights upon the passing of the tenant of record.*
  - *If the tenant of record vacates the unit and/or utilizes their transfer option, all household members will be required to vacate as well.*
- *Over-crowded and severely overcrowded families will be given priority to transfer to an appropriate-sized unit when one becomes available in the developments.*
- *Families living in under-occupied units will remain in place until an appropriate-sized unit becomes available in the developments, at which time they will be required to move to that unit.*
- *Residents will have the right to request reasonable accommodations for medical reasons.*
- *Residents will have continued recognition of and funding for legitimate resident organizations. NYCHA will ensure that the development partner sets aside funding to be accessed by the resident association for eligible activities per the same guidelines as in public housing. The tenant association should remain democratically elected and follow its bylaws post-conversion to Section 8. NYCHA will no longer be the fiscal conduit for City Council or any other contributions received by the association from outside entities.*
- *NYCHA facilitates access to social services through a partnership-based model. Residents at PACT sites can still access the services of local providers within NYCHA's partner network post-conversion. Furthermore, residents will have the added benefit of dedicated social services as defined during the predevelopment process. Certain programs which are limited to conventional public housing*



*residents will remain as such (e.g. NYCHA Resident Training Academy). However, most programs are available to both Section 8 and non-Section 8 residents.*

- *All rehab work that will be performed by the development partner is subject to all applicable federal, state, and local environmental laws and regulations. Compliance with such environmental laws and regulations by the development partner will be made a requirement in the appropriate legal agreements between NYCHA and the partner.*

- NYCHA needs to be transparent about the proposed structure of the conversion transactions, explain the different approval processes and how it will ensure that residents will not be treated differently whether they are converted under RAD or Section 18.

*All residents in PACT developments will undergo a seamless conversion experience as outlined in NYCHA's closing documents with its development partners.*

- NYCHA needs to record the RAD Roundtable Guiding Principles on Resident Rights and Protections with HUD so that they become part of all the blended conversion transactions conducted under the PACT program.

*The Guiding Principles are already an exhibit to NYCHA's closing document with its development partners and are a part of all PACT conversions.*

- The NYCHA plan projects it will engage residents in the 8 developments during the summer of 2017. (In contrast, RAD requires at least 2 consultations before an application can be submitted to HUD.) Did NYCHA engage residents prior to including the conversion program in its draft Plan?

*Yes. NYCHA began community engagement and resident conversion activities at Independence and Williams Plaza in March 2018.*

- What standards will be applied, governing the extent of rehabilitation to be carried out under conversion? (For instance, under RAD, the new owner must meet the 20-year capital need; required renewal of 20-year rent assistance contracts assures ongoing affordability; the resident association will continue to receive tenant participation funding.)

*The extent of rehabilitation will be the same under all PACT sub-programs – NYCHA and its development partners will address the 20-year capital needs of the developments.*

- To prevent arbitrary rent increases, will rents in the converted developments be subject to rent regulation under existing rent stabilization laws?

*As long as the unit is under a Section 8 Housing Assistance Payment (HAP) Contract, rent stabilization should not determine the amount of rent the resident will pay. Regardless of the contract rent, families will generally continue to pay 30 percent of their adjusted gross income.*

- Should 4,000 vouchers be lost to the voucher pool for Section 8 waiting list households to make up for city and state disinvestment? Waiting list families will bear the costs of preservation for state and city abandonment of this stock.

*As their landlord, NYCHA's first responsibility is to its existing residents. Unfortunately, the eight developments in the unfunded unit portfolio are creating a \$23 million annual operating deficit and require \$1.4 billion in capital repairs. Thus, continuing to leave the units in an unfunded status is unsustainable.*

- NYCHA should adopt the RAD infrastructure—federal laws and regulations, as well as local guideline principles—as applicable to the eight designated developments undergoing conversion of unfunded units.

*NYCHA has already adopted the RAD infrastructure described above.*

- The converted buildings should be placed under rent stabilization.

*As long as the unit is under a Section 8 Housing Assistance Payment (HAP) Contract, rent stabilization should not determine the amount of rent the resident will pay. Regardless of the contract rent, families will generally continue to pay 30 percent of their adjusted gross income.*

- NYCHA should directly involve NYCHA residents in selecting which campuses will be targeted for development, and which program will be used at each development (fully affordable, half-affordable, half-market, or a new option of resident's choosing). We believe that NYCHA residents should have an opportunity to vote YES or NO on each new development on their own campuses. NYCHA should offer residents meaningful information about the universe of possibilities so that they can choose the program and affordability mix – if any – that fits their campus's needs. NYCHA must be sensitive to the needs of its tenants and establish a protracted community outreach program incorporating feedback into its decision-making. This is critical to the planning process, as well as project construction and operation. While NYCHA has held community visioning sessions, tenants stated that these meetings are not fully transparent, conducive to open and fair dialogue, and not advertised to residents in the surrounding neighborhood. NYCHA needs to improve communication between NYCHA and its tenants.

*New construction and preservation projects under the NextGeneration Plan include a multi-year engagement process to inform residents of planned developments and to incorporate resident preference and concerns into those projects. Once a potential development site is selected for a NextGeneration project, Community Development and Intergovernmental staff employ extensive outreach to inform elected officials, resident leadership, and residents of the proposed project. NYCHA residents of the development site are provided information through flier distribution, door-to-door canvassing, and informational meetings.*

*For all NextGeneration Neighborhoods' projects, visioning workshops are led by Community Development staff to help NYCHA residents and participating community members identify priorities and concerns regarding the new development. The results of the visioning workshops are summarized in a Community Vision that is published with the Request for Proposals. Proposals that align with the priorities of the community are evaluated favorably during the developer selection phase.*

*After a developer is selected, the development team will continue the public engagement process and present their plans to NYCHA residents and their elected leaders. The*

*development team will also work with NYCHA's Office of Resident Economic Empowerment and Sustainability to connect NYCHA residents to job opportunities before construction begins.*

- NYCHA should increase the financial benefit to impacted NYCHA campuses by: (a) setting a price “floor”- the minimum amount required to proceed – that more accurately reflects the value of a 99-year lease in the “hot” markets where 50/50 projects are being proposed. At minimum, this should be sufficient to address current capital repair needs at each impacted campus, (b) requiring developers to make annual revenue contributions to support future capital needs at the impacted developments and (c) ensuring that a greater share of the financial benefit from each project is directed toward the impacted campus, as residents of these campuses will bear the full cost of the new developments.

*Responses to the Request for Proposals are evaluated on various criteria including return to NYCHA. NYCHA has requested that applicants provide an upfront payment for the value of the ground lease so that NYCHA is able to address critical capital needs.*

- NYCHA needs to meaningfully consider proposed infill projects in the context of other neighborhood conditions, including (a) ongoing impacts from Superstorm Sandy, and environmental hazards more generally and (b) other active construction proposals in the neighborhood.

*All new construction projects on NYCHA land are subject to environmental review per the National Environmental Policy Act (NEPA), the State Environmental Quality Review Act (SEQR), and the New York City Environmental Quality Review (CEQR). Mitigation measures will be applied were any on-site or nearby toxic, hazardous, or radioactive substances are found that could affect the health and safety of project occupants or conflict with the intended use of the property.*

- NYCHA needs to create transparent, enforceable, and meaningful opportunities for resident oversight and decision-making in the implementation of NextGen Neighborhoods projects, including by: (a) establishing separate accounts with an independent auditing system to ensure that all funds earmarked for impacted NYCHA campuses are received by, and expended at, these campuses; (b) creating a clear structure through which NYCHA residents can weigh in on expenditure of funds received through these projects.

*NYCHA is committed to transparency for all funds received through the NextGen Neighborhoods program and is working with stakeholder committees at each project site to ensure resident participation on expenditure of funds.*

- NYCHA should extend its outreach program to the Community Boards in each area affected by proposed infill development. Public engagement should include invitations to public hearings as well as presentations to the various Community Boards during the planning of proposed developments.

*NYCHA has reached out to Community Boards and will continue to present to and otherwise engage Community Boards as requested.*

- The impacts of the new developments must be well-served by public infrastructure and amenities. New residential developments on NYCHA campuses must not overburden local

schools and open space. Furthermore, no infill projects on NYCHA campuses should result in a net decrease in the amount of recreational facilities or other amenities.

*All new construction projects on NYCHA land are subject to environmental review per the National Environmental Policy Act (NEPA), the State Environmental Quality Review Act (SEQR), and the New York City Environmental Quality Review (CEQR). Further, many new construction projects include improvements to open space, recreation facilities, landscaping, and other site improvements.*

- NYCHA should not bypass or circumvent zoning regulations in the planning and construction of new developments. The City's Zoning Resolution is intended to preserve safety and neighborhood character and ensure to predictability of proposed development. Residents on NYCHA campuses and in the adjoining neighborhoods deserve these protections. NYCHA should not use vehicles such as a Mayoral Zoning Override (MZO) considered for the John Haynes Holmes Towers in the Yorkville section of Manhattan.

*All new construction projects are required to comply with the New York City Zoning Resolution, the NYC Construction Code, as well as additional guidelines. Where appropriate, Mayoral Zoning Overrides are at times requested. All Mayoral Zoning Overrides are reviewed by the Department of City Planning as well as other appropriate NYC agencies.*

- Why are the only developers that are being selected private developers who have given large sums of money towards Mayor De Blasio's campaign and who are also qualifying for millions in taxpayer subsidies?

*All developers are selected through open and competitive Request for Proposals process.*

- Why isn't NYCHA asking for annual payments in addition to the upfront ground lease payments?

*NYCHA has requested that applicants provide an upfront payment for the value of the ground lease so that NYCHA is able to address critical capital needs. This represents the present value of payments that would otherwise be made over time and may not be available for addressing capital needs immediately. Additional annual payments would reduce the value of the upfront payment.*

- Why are local community not-for-profit organizations not allowed to submit their proposals for NextGen projects?

*Not-for-profit organizations are encouraged to apply for all NextGen Requests for Proposals.*

- With the recent changes in NYCHA leadership, all development projects should be reviewed by the new leadership and NYCHA board.

*All ground leases are subject to NYCHA Board and US Department of Housing and Urban Development approval pursuant to Section 18 or otherwise.*

- NYCHA needs to explain the doomsday clause that is in effect for RAD developments.

*NYCHA is not aware of any doomsday clause.*

- As the process of converting developments to RAD moves forward, it is imperative that NYCHA continue an open dialogue with residents. Furthermore, elected officials must remain informed and engaged so that they are able to work together with their tenants to figure out what is best for them.

*NYCHA goes to great lengths to conduct in-depth and extensive engagement with its residents, elected officials, and community stakeholders on all of its development programs, including PACT-RAD.*

- If NYCHA does go forward with this project to build a new building at LaGuardia Houses, the following recommendations should be taken. First, anything built must be 100 percent permanently affordable. Second, if there is already a proposed retail space, NYCHA should seriously consider adding an affordable grocery store in that space. While NYCHA has cited some zoning limitations preventing a grocery store from being built in that space, the suggestion warrants further analysis. Lastly, revenue generated from this project at LaGuardia Houses should go back to LaGuardia first; the remaining funds should then be distributed among neighboring NYCHA developments on the Lower East Side. This is in lieu of the funding being split fifty-fifty between LaGuardia Houses and the general NYCHA pot.

*The established affordability levels will remain for the duration of the 99-year ground lease. The existing zoning restricts the program of the new building to residential and community facility uses. Inclusion of a grocery store would require a change in zoning subject to Uniform Land Use Review Procedure. We will be reviewing responses to the Request for Proposals with the stakeholder committee at La Guardia and will discuss the proposed as-of-right ground floor uses in the context of affordable food access. It is currently proposed that fifty percent of the revenue generated will go into capital repairs at La Guardia so that the additional revenue can be used elsewhere on NYCHA developments that could not benefit from this program otherwise.*

- How many units, in numbers not percentages, will there be in each income range that would allow NYCHA residents to permanently respond to – 30% of their annual income?

*The total unit count is not yet known and therefore the number of affordable units is not yet known. NYCHA is continuing to explore opportunities for the development site. NYCHA will use the resident input collected during the visioning workshops to understand the desired affordability levels and unit distribution for the new building. Those priorities will be captured in the Community Vision Summary which will be published with the Request for Proposal (RFP). Proposals that align with the priorities of the community will be evaluated favorably. NYCHA residents will receive a preference for twenty-five percent (25%) of the new affordable units created.*

- Will supportive services (Section 202/Elderly Program, Section 811/Supportive Housing for Persons with Disabilities Program, or Section 8) be in place as anything higher than 30% of one's income may be appropriate only for seniors/disabled/homeless/low income families who have these services in place? There should be programs that offer means of

accommodating our needs, more specifically HUD programs where NYCHA would remain the landlord.

*NYCHA will use the resident input collected during the visioning workshops to understand the desired programs and target populations for the new building. Those priorities will be captured in the Community Vision Summary which will be published with the Request for Proposal (RFP). Proposals that align with the priorities of the community will be evaluated favorably.*

- In dollars and cents, what would be the income range that both the “affordable” and market rate units go for? Low income families are being disqualified from even applying for these “affordable” housing units.

*Affordable unit rents are set per US Department of Housing and Urban Development guidelines. Rents for 2018 are available on NYC Housing Preservation and Development Department’s website here:*

*<https://www1.nyc.gov/site/hpd/renters/find-housing.page>.*

*As an example (using 2018 rents) an affordable two-bedroom apartment at 60% AMI would be \$1,280 per month while an affordable studio apartment at 30% AMI would be \$367 per month. There are no limits on rents for the market rate apartments.*

- Will there be any federal requirements regarding how many families below 30% of the area median income (AMI) can apply and occupy these units? If NYCHA is not including income ranges that low-income families or single people can respond to, will NYCHA amend this to include a range that all incomes can respond to as this is a need in this development?

*NYCHA will use the resident input collected during the visioning workshops to understand the desired affordability levels and unit distribution for the new building. Those priorities will be captured in the Community Vision Summary which will be published with the Request for Proposal (RFP). Proposals that align with the priorities of the community will be evaluated favorably.*

- Will all “affordable” units created at Cooper Park continue to be “affordable” for the life of the building and/or property (not building because at some point and for whatever reason the building can come down)? Will there be legal remedies in place to enforce this?

*The established affordability levels will remain permanently affordable.*

- Will “affordable” units be designed just like market-rate units?

*Affordable units must meet NYC Housing Preservation and Development Department’s Design Guidelines for New Construction and Substantial Rehabilitation. Affordable and market rate will be distributed throughout a majority of the floors in the building. All building services, amenities, entrances, and views must be open to residents of both the affordable and market rate units. There may be some differences between and among market rate and affordable units.*

- Are there appropriate agencies in place that have been conducting the necessary environmental testing and reviews at Cooper Park? With what NYCHA is proposing now, can NYCHA without reservations say that building 250 units at Cooper Park's parking lot will not have a negative detrimental impact on the residents living here and is what you'd receive from the leasing compensate for the deterioration and possibly loss of residents' lives due to their inability to have access to the sun?

*All new construction projects on NYCHA land are subject to environmental review per the National Environmental Policy Act (NEPA), the State Environmental Quality Review Act (SEQR), and the New York City Environmental Quality Review (CEQR). These analyses determine the environmental areas of concern that must be mitigated prior to the undertaking of a proposed action. The finalization of the mitigation plans involves expert guidance from other participating city, state, and federal agencies.*

- Are flood plan analyses, which would determine possibilities for flood on the proposed lot at Cooper Park, being conducted before an RFP is issued?

*A desktop review of flood risk was completed during the planning process of the NextGen Neighborhoods project at Cooper Park. The development site is not located within the Federal Emergency Management Agency's (FEMA) Special Flood Hazard Areas or the Department of State's coastal zone boundaries.*

- What studies are being performed to determine the air quality at Cooper Park?

*The proposed development at Cooper Park must conform with the Clean Air Act (National Ambient Air Quality Standards (NAAQS)) requirements so that it does not constitute a significant new source of air pollution.*

- Why are local community not-for-profit organizations that have a history of providing housing and services within the Cooper Park community being left out of the development process? Will NYCHA consider a neighborhood not-for-profit organization and/or community sponsors that would better ensure that the development at Cooper Park responds to this community's needs? NYCHA should lease the community center space at Cooper Park and replace it with a multi-use building. It is recommended that NYCHA gives the Boys and Girls Club of America a land lease in which they could build and manage a state of the arts facility. Above the Boys and Girls Club, NYCHA could also include a post office.

*The NextGen Neighborhoods project at Cooper Park is currently in the resident visioning phase. At this time, it is anticipated that a portion of the ground floor space of the new building will be reserved for community facility uses. NYCHA encourages residents and community members to participate in the visioning workshops to provide recommendations for uses (i.e. daycare center, youth center, post office, etc.) NYCHA encourages local organizations to participate in the visioning workshops and to respond to the Request for Proposals once it is released.*

- There is a need for early childhood programs at Cooper Park. NYCHA could enhance Cooper Park's Child Care Center's program by including 3-year olds and additional "affordable" units can be built above it.

*Cooper Park's buildings 3 and 4 are currently mixed-use buildings with community facility uses at the ground floor funded by Department of Youth and Community Development, Administration for Children's Services, and Department for the Aging. Currently, the Cooper Park Child Care Center serves children ages 2 to 4 years old, up to children going on 5 years old.*

- Has NYCHA insisted that potential developers of Cooper Park provide sufficient parking spaces underground in their plans for those residents already parking on this lot? Will there be an underground parking lot at Cooper Park? Will the developers be required to provide sufficient parking spaces for NYCHA residents who now park in this lot at the same cost residents pay now?

*All current resident permit holders will retain parking permits. Residents permit holders will be relocated to existing spaces and/or replacement parking will be created if necessary.*

- How many spaces have been leased on Cooper Park's parking lot? What is the number of parking stickers that NYCHA has sold for the last 5 years in each of the 3 Cooper Park parking lots? How many spaces are there in each of the lots? How many stickers have been purchased from each lot?

*Cooper Park Houses has four parking lots with a total of 112 parking spaces for non-NYCHA staff. The development is a non-reserved location and permits are not issued by specific lot and/or space. Currently, Cooper Park has 56 resident permit holders and 27 non-resident permit holders for a total of 83 permit holders. The number of issued parking permits at Cooper Park has increased over the last 5 years, from 55 in 2014 to 83 at the present time.*

*The development site is proposed on a 76-space parking lot and will likely require the relocation of approximately 20 spaces. NYCHA has studied potential at-grade locations to build new parking spaces for current resident permit holders. If new replacement parking is required, information on the potential sites will be presented at future resident engagement meetings. If required, the new parking spaces will be sited and developed in consultation with resident leadership and will include sufficient spaces for handicap permit holders.*

- What has NYCHA done to mitigate the number of parking spaces not occupied? Has any advertising to neighboring businesses been notified that their car owners could lease a space? Is this an oversight on NYCHA's behalf, laziness, or simply an underhanded plan? What outreach has NYCHA done?

*In general, the outreach for permit lease-up includes contacting potential applicants on the waitlist. There has been no advertisement to the neighboring businesses of the availability of parking spaces since there was an existing waitlist.*

How will the "affordable" units be affected if the developer is responsible for picking up the cost of replacing the existing parking spaces?

*All current resident permit holders will retain parking permits. Residents permit holders will be relocated to existing spaces and/or replacement parking will be created if necessary. The need to provide replacement parking should not affect affordable units.*



- The language on the NextGen at Cooper Park Fast Fact sheet is frightening. NYCHA Ownership stated, “NYCHA maintains full ownership of the land ensuring long-term affordability.” The last sentence is concerning because it says “long-term” not “permanent”. Is NYCHA going to maintain full ownership of this lot permanently or can there be plans to sell this land which may mean that developers can opt out after a certain number of years of receiving funding and then get private money to maintain this proposed building? If NYCHA says they are leasing the land for 100 years, does this mean that NYCHA is literally proposing to lease this land for 100 years? Is this 100 years of leasing “life without possibility of parole” or “will there be a release after a decade or more has passed”?

*NYCHA intends to remain the owner of the land. Units will remain permanently affordable.*

- In the current proposal at Cooper Park, how long is “leasing land” and “affordable”? How long will those set aside 50% affordable units remain “affordable”? Is it NYCHA’s intention for the 50% affordable units at Cooper Park to remain “affordable” as long as NYCHA ‘retains’ or continues to own this property?

*NYCHA intends to remain the owner of the land. Units will remain permanently affordable.*

- Under what conditions will NYCHA not “retain an interest” in the Cooper Park parking lot? Would it be after the developers seek private funding allowing them to do as they please with the proposed building? How will NYCHA legally and in writing intend to prevent this from happening and NYCHA can remain the owner of this land? How will NYCHA keep control of the land? Will NYCHA use any type of “regulatory property control” which can exclude everyone from purchasing this land or from using this building in another way other than what is originally agreed upon? What are the parameters that NYCHA is setting by which potential developers must respond to? Does the proposal include things such as but not limited to agreements, deed restrictions, resale restrictions for the life of the building, and other requirements which may be necessary?

*NYCHA intends to remain the owner of the land. The percentage of units designated as affordable will remain permanently affordable. Terms and conditions will be defined in the transaction documents.*

- Is NYCHA’s short/long term plan to sell the lot at Cooper Park? This was stated in an article on October 2, 2017 “Public Housing Will Host Private Development in East Williamsburg” it was stated that “...the city will start accepting bids next spring for the latest installment of NextGen Neighborhoods, the controversial plan launched in 2015 that entrails selling off chunks of NYCHA land to private developers in order to put a dent in the Authority’s multi-billion-dollar deficit.” How will NYCHA have a ground lease on the proposed building at Cooper Park and for what reasons could this change?

*NYCHA intends to remain the owner of the land. Units will remain permanently affordable.*

- If private developers were selected to build on the Cooper Park site, will the City have a monitoring component specifying the maximum rent and explaining specifically how everything is to be carried out?

*Regulatory Agreements recorded against the site should specify the rent restrictions and levels. These are generally administered by HPD and the Housing Development Corporation (HDC).*

- Why aren't any of the units at Cooper Park being set aside for NYCHA residents who are underutilizing their units or who are overcrowded? With what NYCHA is proposing, why hasn't NYCHA proposed setting aside a percentage of those 1-bedroom units and not studio apartments for those residents who are underutilizing their current apartments so that NYCHA can generate additional income by renting those now vacant apartments?

*NYCHA residents will receive a preference for 25% of the affordable units.*

- What amount is necessary to fix problems at Cooper Park Houses? In the article on October 2, 2017 "Public Housing Will Host Private Development in East Williamsburg" it was stated that there are currently \$59 million in unmet capital needs. With Holmes Towers receiving \$12.5 million from money generated from this program, is NYCHA expecting anything close to this amount (\$59 million) for the proposed plan at Cooper Park? What is the estimated dollar amount the Cooper Park will receive towards repairs/capital improvements from the proposed building?

*NYCHA intends to use a portion of the funds generated from the Project on capital improvements at Cooper Park. Once a developer is selected, the return to NYCHA will be known and shared publicly.*

- Will Cooper Park still receive funding from NYCHA's Capital Plan and how much does it equate to in dollars and cents? How would it affect the \$60 million needed?

*Cooper Park will remain eligible for funding through the Capital Plan. There is not a formula to predict funding for a given site; funding is based upon the physical needs in the context of needs across the portfolio.*

*Currently, there are two planned federally funded projects at Cooper Park. Fire alarm replacement is planned for FY2020 and improving elevator two-way communications is planned for FY2022. Cooper Park was also included in NYCHA's \$250M proposal to the State to receive \$20M to implement heating plant upgrades. Further planning awaits the release of funds from the State.*

- Has NYCHA considered receiving additional funds in annual payments, instead of a one-shot deal that doesn't resolve anything? Will those annual payments continue to be given to Cooper Park? If not, why not? NYCHA should be asking for annual "leasing" payments in addition to the lump sum.

*NYCHA has requested that applicants provide an upfront payment for the value of the ground lease so that NYCHA is able to address critical capital needs. Additional annual payments would reduce the value of the upfront payment.*

- Will proposed developer's proposals for Cooper Park be judged on appropriate programs that suit the needs of our community, and not merely the highest bidder?

*During the developer selection phase of the project, proposals from developers will be evaluated competitively according to the following criteria (subject to change prior to the release of the Request for Proposals):*

- *Financial Return to NYCHA*
- *Financial Feasibility of Development Proposal*
- *Quality of Building & Urban Design*
- *Program*
- *Development Experience, Management, & Capacity*

*Proposals that align with the Community Visioning Summary will be scored favorably.*

- Does NYCHA have preventative measures in place that vermin living underground will not venture into the playground and apartments at Cooper Park? What are they? Who will be responsible for assessments and preventative measures to adjacent properties and NYCHA buildings at Cooper Park? When the idea to build at Cooper Park was first developed in 2005/2007, at that time homeowners reported that their foundations were being undermined by work because contractors failed to simply do the required underpinnings. If there is foundation damage, where will the money come from to correct those damages? Will it come from the meager proposed amount that Cooper Park will receive? Who will be responsible for the time-to-time assessments and preventative measures to the properties adjacent to Cooper Park? Who will be responsible for making sure that the time-to-time assessments and preventative measures are taking place?

*The proposed development will be subject to all requirements set forth by NYC's Department of Buildings (DOB). DOB enforces compliance with these regulations and promotes worker and public safety through its review and approval of building plans, permitting and licensing functions, and inspections. Permits are required for most excavation work, including underpinning. The work must meet the approved plans and include precautions such as regularly checking nearby walls for cracks, bulges, and spalling.*

*The selected developer will be required to carry insurance according to the requirements outlined in the ground lease. The developer will be liable for any injuries or damages caused during or as a result of the construction.*

*The development team and their contractor will also meet regularly with the resident association leadership throughout construction to directly address any concerns or issues that arise.*

- Has anyone at NYCHA considered the negative health impacts that the proposed building at Cooper Park may have on residents' quality of life?

*NYCHA is concerned about the negative health impacts of housing on its residents. The NextGen Neighborhoods project is hoping to address many of the current impacts at Cooper Park through capital repairs on the existing buildings. Once a proposed design for the new building is selected, an environmental review will determine whether it meets federal, state, and local environmental standards. The proposed development will be subject to all requirements set forth by NYC's Department of Buildings. The new building must comply with required distances between new and existing buildings for fire separation, natural light and ventilation.*

- Prior to any construction, what investigation will be performed to determine if there is any presence and nature of contamination (pipes underground that are connected to the imploded tanks/grave site) at Cooper Park? Prior to any construction, what are the proper remedial and/or health and safety measures that will be employed at Cooper Park? NYCHA should not construct the development at Cooper Park because as a project that may very well take up an entire block (between Debevoise & Morgan Aves), it far exceeds the footprint and scale of the adjacent buildings. Secondly, developing this narrow corridor blocks air, people, and would appear (emergency) vehicles from access to the center of the Cooper Houses. NYCHA should be concerned about the negative effects as it relates to health issues to residents of all ages, sex and race if the proposed building at Cooper Park is built in the parking lot, as blocking sunlight will cause residents to be sunlight deficient.

*NYCHA is concerned about the negative health impacts of housing on its residents. The NextGen Neighborhoods project is hoping to address many of the current impacts at Cooper Park through capital repairs on the existing buildings. Once a proposed design for the new building is selected, an environmental review will determine whether it meets federal, state, and local environmental standards. The proposed development will be subject to all requirements set forth by the NYC Department of Buildings. The new building must comply with required distances between new and existing buildings for fire separation, natural light and ventilation.*

- What is NYCHA’s definition of “underutilized?”

*The term “underutilized” means the land is not fulfilling its highest and best use.*

- At Cooper Park, can developers apply for low-income housing tax credits through the state?

*Applicants to the RFP may propose use of Low Income Housing Tax Credits.*

**ATTACHMENT O**

**PIH NOTICE 2016-17-RENTAL ASSISTANCE DEMONSTRATION (RAD)  
NOTICE REGARDING FAIR HOUSING AND CIVIL RIGHTS  
REQUIREMENTS AND RELOCATION REQUIREMENTS APPLICABLE TO  
RAD FIRST COMPONENT – PUBLIC HOUSING CONVERSION**



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

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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
<b>SECTION 6. RELOCATION REQUIREMENTS .....</b>		<b>38</b>
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
<b>SECTION 7. APPLICABILITY OF HCV AND PUBLIC HOUSING REQUIREMENTS .....</b>		<b>60</b>
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 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>

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<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).