

Final PHA Agency Plan

Annual Agency Plan for Fiscal Year 2022



Gregory Russ
Chair & Chief Executive Officer

Date: October 18, 2021

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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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>PHA Name: New York City Housing Authority PHA Code: NY005</p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: 01/2022</p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units 168,100; Number of Section 8 Vouchers: 88,516. Total Combined Units/Vouchers 256,616</p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. 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"/> PHA Consortia: (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

B.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</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 checked="" type="checkbox"/> <input 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 type="checkbox"/> <input checked="" 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.2	<p>New Activities.</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 type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" 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> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p>

	<p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(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.</p> <p>Please see Attachments B and C (Demolition and/or Disposition, Conversion of Public Housing, Homeownership, and Project-Based Vouchers and RAD, and Capital Improvements – Capital Fund Annual Statement).</p> <p><i>As of January 1, 2021, NYCHA has executed 162 HAP contracts for 14,013 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 RAD conversions.</i></p>
B.3	<p>Civil Rights Certification.</p> <p>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.</p>
B.4	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit? Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>Please see Attachment A (PHA Plan Update)</p>
B.5	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>Please see Attachment E (Additional Information)</p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan? Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) 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.</p> <p>Please see Attachment M</p>
B.7	<p>Certification by State or Local Officials.</p> <p>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.</p>
B.8	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A</p> <p><input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p>Statement of Capital Improvements. 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>

C.1	<p>Capital Improvements. 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 2021 CAPITAL FUND GRANT AND 5-YEAR ACTION PLAN ON MAY 3, 2021.</p>
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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 90 Church Street, New York, New York, at (212) 306-3123 or by emailing annualplancomments@nycha.nyc.gov to schedule an appointment to review the documents.

List of Supporting Documents Available for Local Review <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>	5-Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5-Year and Annual 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"> • <i>NYCHA Management Manual</i> • <i>NYCHA Application and Tenancy Administration Manual</i> • <i>NYCHA Tenant Selection and Assignment Plan (TSAP) Manual</i> • <i>NYCHA Human Resources Manual</i> • <i>NYCHA Emergency Procedure Manual</i> • <i>NYCHA Contract Procedure Resolution</i> • <i>NYCHA General Memoranda</i> • <i>NYCHA Deputy General Manager Memoranda</i> • <i>NYCHA Standard Procedures</i> 	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies

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(Applicable to All PHA Plan Types)

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Applicable & On Display	Supporting Document	Applicable Plan Component
X	Deconcentration Income Analysis <i>NYCHA’s Deconcentration Income Analysis begins on page 199 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 pages 39 and 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 beginning on 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 pages 46 and 47 of the Final Annual Plan and in NYCHA’s Management Manual in Chapter III on page 107 and in Exhibit 2 on page 128.</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 pages 47 and 48 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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Applicable & On Display	Supporting Document	Applicable Plan Component
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 104 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 beginning on page 205.</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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Applicable & On Display	Supporting Document	Applicable Plan Component
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 Draft Significant Amendment to the Fiscal Year (FY) 2021 Annual Plan and the FY 2022 Draft Annual Plan

The public is advised that the Draft Significant Amendment to the FY 2021 Annual Plan and the FY 2022 Draft Annual Plan will be available for public inspection starting June 11, 2021, on NYCHA's website: on.nyc.gov/nycha-annual-plan. They will also be made available at the management office of every NYCHA public housing development during regular business hours. The Executive Summaries are available on NYCHA's website in English, Spanish, Russian, and Chinese.

Please email annualplancomments@nychanyc.gov if you would like to review the supporting documents for the Draft Significant Amendment to the FY 2021 Annual Plan and the FY 2022 Draft Annual Plan.



PUBLIC COMMENT

The public is invited to comment on the Draft Significant Amendment to the FY 2021 Annual Plan and the FY 2022 Draft Annual Plan at a public hearing on Tuesday, July 27, 2021, from 5:30 p.m. to 8 p.m. To help contain the spread of COVID-19, NYCHA will hold this public meeting remotely.



Attending the hearing: To attend the hearing, please register at on.nyc.gov/july-public-hearing. We encourage you to register as soon as possible. Instructions on how to participate, as well as meeting materials, will be posted on <https://on.nyc.gov/nycha-annual-plan> before the meeting. To attend the meeting by phone, you may dial 888 788 0099 at the time of the hearing and enter Webinar ID: 890 8042 1683.

Interpretation services will be available on Zoom in Spanish, Chinese, Russian, and American Sign Language. Those attending by phone who require foreign language interpretation may dial 646-838-1534 and the following ID numbers at the time of the hearing for live interpretation: Spanish: 776 457 258#, Chinese: 920 091 465#, Russian: 608 916 567#.

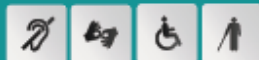
Those who do not intend to actively participate are encouraged to watch the meeting through a YouTube livestream on NYCHA's website or the recording that will be posted after the meeting on NYCHA's website: on.nyc.gov/nycha-annual-plan.



Signing up to speak: Anyone wishing to speak on the items related to the Draft Significant Amendment to the FY 2021 Annual Plan and the FY 2022 Draft Annual Plan should sign up to speak at on.nyc.gov/public-hearing-speaker-signup or by calling 212-306-3335. To give others an opportunity to speak, all speakers are asked to limit their remarks to three minutes.

Written comments regarding the Draft Significant Amendment to the FY 2021 Annual Plan and the FY 2022 Draft Annual Plan are encouraged. To be considered, submissions must be received via United States Postal Service mail or fax no later than July 30, 2021. Comments can be faxed to (212) 306-8888. Comments can also be mailed to the following address or emailed to annualplancomments@nychanyc.gov.

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



Requests for reasonable accommodations should be made by July 20, 2021, by emailing annualplancomments@nychanyc.gov or calling 212-306-3335.

Bill de Blasio, Mayor

Gregory Russ, Chair and Chief Executive Officer

A translation of this document is available in your Property Management Office.
La traducción de este documento está disponible en su Oficina de Administración de Propiedades.
您所居住住宅區物業管理處辦公室提供本文件的譯本。
您所居住住宅區物業管理處辦公室提供本文件的譯本。
Перевод этого документа находится в Офисе управления вашего жилищного комплекса.

COMUNICADO

Proyecto de Enmienda Significativa de la Autoridad de Vivienda de la Ciudad de Nueva York al Plan Anual para el Año Fiscal 2021 y el Borrador del Plan Anual para el Año Fiscal 2022

Se informa al público de que el Proyecto de Enmienda Significativa al Plan Anual del año fiscal 2021 y el Proyecto de Plan Anual para el año fiscal 2022 estarán disponibles para la inspección pública a partir del 11 de junio de 2021, en el sitio web de NYCHA: on.nyc.gov/nycha-annual-plan. También estarán disponibles en la oficina de administración de cada residencial de vivienda pública de NYCHA durante horas regulares de trabajo. Los Resúmenes Ejecutivos están disponibles en el sitio web de NYCHA en inglés, español, ruso y chino.

Por favor, envíe un correo electrónico a annualplancomments@nycha.nyc.gov si desea revisar los documentos de apoyo para el Proyecto de Enmienda Significativa al Plan Anual del Año Fiscal 2021 y el Proyecto de Plan Anual del Año Fiscal 2022.

COMENTARIOS DEL PÚBLICO



Se invita al público a comentar sobre el Proyecto de Enmienda Significativa al Plan Anual del Año Fiscal 2021 y el Proyecto de Plan Anual del Año Fiscal 2022 en una audiencia pública el **martes 27 de julio de 2021, de 5:30 p.m. a 8 p.m.** Para ayudar a contener la propagación del COVID-19, NYCHA celebrará esta reunión pública de forma remota.



Asistencia a la audiencia: Para asistir a la audiencia, por favor regístrese en on.nyc.gov/july-public-hearing. Le recomendamos que se registre lo antes posible. Las instrucciones sobre cómo participar, así como los materiales de la reunión, se publicarán en on.nyc.gov/nycha-annual-plan antes de la reunión. Para asistir a la reunión por teléfono, puede marcar 888 788 0099 en el momento de la audiencia e ingresar el número de identificación del seminario web: 890 8042 1683.

Los servicios de interpretación estarán disponibles en Zoom en español, chino, ruso y lengua de signos americana. Los asistentes por teléfono que requieran interpretación en idioma extranjero pueden marcar 646-838-1534 y los siguientes números de identificación en el momento de la audiencia para la interpretación en vivo: español: 776 457 258#, chino: 920 091 465#, ruso: 608 916 567#.

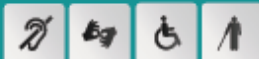
Se anima a aquellos que no tengan la intención de participar activamente a ver la reunión a través de una transmisión en vivo por YouTube en el sitio web de NYCHA o la grabación que se publicará después de la reunión en el sitio web de NYCHA: on.nyc.gov/nycha-annual-plan.



Regístrese para hablar: Cualquier persona que desee hablar sobre los temas relacionados con el Proyecto de Enmienda Significativa al Plan Anual del Año Fiscal 2021 y el Proyecto de Plan Anual del Año Fiscal 2022 debe inscribirse para hablar en annualplancomments@nycha.nyc.gov o llamando al 212-306-3335. Para dar a los demás la oportunidad de hablar se pide a todos los oradores que limiten sus observaciones a tres minutos.

Se recomiendan comentarios por escrito sobre el Proyecto de Enmienda Significativa al Plan Anual del Año Fiscal 2021 y el Proyecto de Plan Anual del Año Fiscal 2022. Para ser considerado, las comunicaciones deben recibirse mediante correo postal de los Estados Unidos o fax a más tardar el 30 de julio de 2021. Los comentarios pueden ser enviados por fax al (212) 306-8888. Los comentarios también pueden enviarse por correo a la siguiente dirección o enviarse por correo electrónico a annualplancomments@nycha.nyc.gov.

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



Las solicitudes de adaptaciones razonables deben hacerse antes del 20 de julio de 2021, enviando un correo electrónico a annualplancomments@nycha.nyc.gov o llamando al 212-306-3335.

Bill de Blasio, alcalde

Gregory Russ, presidente y Primer Ejecutivo

通知

紐約市房屋局「2021財政年度機構計劃」重大修正案初稿和「2022財政年度機構計劃」初稿

從2021年6月11日起，各界人士可登陸紐約市房屋局 (NYCHA) 網站查閱「2021財政年度機構計劃」重大修正案初稿和「2022財政年度機構計劃」初稿，網址：on.nyc.gov/nycha-annual-plan。民眾也可於正常辦公時間前往NYCHA轄下公共房屋住宅區管理處辦公室索取計劃文件。NYCHA網站將提供計劃行政概述的英文，西班牙文，俄文和中文版本

如您想查看「2021財政年度機構計劃」重大修正案初稿和「2022財政年度機構計劃」初稿的補充文件，請發送電郵至：annualplancomments@nycha.nyc.gov提出要求。



諮詢公眾意見

誠邀各界人士參加NYCHA於2021年7月27日，星期二，下午5時30分至晚上8時舉行的公共聽證會，對「2021財政年度機構計劃」重大修正案初稿和「2022財政年度機構計劃」初稿發表意見。為遏制COVID-19新冠疫情傳播，NYCHA 將以視訊形式舉辦此次公共會議。



參加會議：請上網登記報名參加公共聽證會，網址：on.nyc.gov/july-public-hearing。我們鼓勵您儘快登記報名。參加方法及會議資訊材料將於會議前發佈於 on.nyc.gov/nycha-annual-plan。通過電話參加會議人士可於會議進行期間撥打888 788 0099，接通後輸入會議密碼：890 8042 1683。

通過Zoom軟件召開的網絡會議將提供西班牙語，中文，俄語和手語翻譯服務。通過電話參加會議且需要外語傳譯服務人士可於會議進行期間撥打646-838-1534並於接通後輸入相應語言的會議密碼收聽同聲傳譯：西班牙語：776 457 258#，中文：920 091 465#，俄語：608 916 567#。

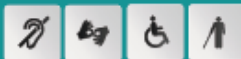
如果您不打算參加會議並發言，您可登陸NYCHA網站觀看YouTube現場直播或在會後登陸NYCHA網站觀看錄影視頻，網址：on.nyc.gov/nycha-annual-plan。



登記發言：如果您想要在公共聽證會上對相關議題發表意見，請提前上網：on.nyc.gov/public-hearing-speaker-signup 或致電：**212-306-3335** 登記。為確保其他與會者獲得發言的機會，所有發言者的發言時間將被限制在三分鐘內。

歡迎各界人士對「2021財政年度機構計劃」重大修正案初稿和「2022財政年度機構計劃」初稿發表書面意見。我們僅會考慮於2021年7月30日限期前以傳真或郵寄方式提交的意見書。請將意見書傳真至：(212) 306-8888 或郵寄至下列地址或通過電郵發送至：annualplancomments@nycha.nyc.gov。

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



如果需要合理便利措施安排，請於2021年7月20日之前通過電郵：annualplancomments@nycha.nyc.gov 或電話：**212-306-3335** 提出申請。

比爾·白思豪 (Bill de Blasio), 市長

雷戈里·羅斯 (Gregory Russ), 主席兼行政總監

通知

纽约市房屋局「2021财政年度机构计划」重大修正案初稿和「2022财政年度机构计划」初稿

从2021年6月11日起, 各界人士可登陆纽约市房屋局 (NYCHA) 网站查阅「2021财政年度机构计划」重大修正案初稿和「2022财政年度机构计划」初稿, 网址: on.nyc.gov/nycha-annual-plan。民众也可于正常办公时间前往NYCHA辖下公共房屋住宅区管理处办公室索取计划文件。NYCHA网站将提供计划行政概述的英文, 西班牙语, 俄文和中文版本。

如您想查看「2021财政年度机构计划」重大修正案初稿和「2022财政年度机构计划」初稿的补充文件, 请发送电邮至: annualplancomments@nycha.nyc.gov提出要求。



咨询公众意见

诚邀各界人士参加NYCHA于2021年7月27日, 星期二, 下午5时30分至晚上8时举行的公共听证会, 对「2021财政年度机构计划」重大修正案初稿和「2022财政年度机构计划」初稿发表意见。为遏制COVID-19新冠疫情传播, NYCHA将以视频形式举办此次公共会议。



参加会议: 请上网登记报名参加公共听证会, 网址: on.nyc.gov/july-public-hearing。我们鼓励您尽快登记报名。参加方法及会议信息材料将于会议前发布于 on.nyc.gov/nycha-annual-plan。通过电话参加会议人士可于会议进行期间拨打888 788 0099, 接通后输入会议密码: 890 8042 1683。

通过Zoom软件召开的网络会议将提供西班牙语, 中文, 俄语和手语翻译服务。通过电话参加会议且需要外语传译服务人士可于会议进行期间拨打**646-838-1534**并于接通后输入相应语言的会议密码收听同声传译: 西班牙语: 776 457 258#, 中文: 920 091 465#, 俄语: 608 916 567#

如果您不打算参加会议并发言, 您可登陆NYCHA网站观看YouTube现场直播或在会后登陆NYCHA网站观看录像视频, 网址: on.nyc.gov/nycha-annual-plan。



登记发言:如果您想要在公共听证会上对相关议题发表意见, 请提前上网: <https://on.nyc.gov/public-hearing-speaker-signup> 或致电: 212-306-3335 登记。为确保其他与会者获得发言的机会, 所有发言者的发言时间将被限制在三分钟内。

欢迎各界人士对2021财政年度机构计划重大修正案初稿和2022财政年度机构计划初稿发表书面意见。我们仅会考虑于2021年7月30日限期前以传真或邮寄方式提交的意见书。请将意见书传真至: (212) 306-8888 或邮寄至下列地址或通过电邮发送至: annualplancomments@nycha.nyc.gov。

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



如果需要合理便利措施安排, 请于2021年7月20日之前通过电邮: annualplancomments@nycha.nyc.gov 或电话: 212-306-3335 提出申请。

比尔·白思豪 (Bill de Blasio), 市长

雷戈里·罗斯 (Gregory Russ), 主席兼行政总监

УВЕДОМЛЕНИЕ

Проект Значительной поправки Жилищного управления г. Нью-Йорка к Годовому плану агентства на 2021 финансовый год (FY) и проект Годового плана агентства на FY 2022

Настоящим извещаем, что проект Значительной поправки (Significant Amendment) к Годовому плану на FY 2021 и проекту Годового плана на FY 2022 будут доступны для публичного ознакомления начиная с 11 июня 2021 года на вебсайте NYCHA on.nyc.gov/nycha-annual-plan и в офисе управления каждого жилищного комплекса NYCHA в обычные приемные часы. Краткий обзор Плана доступен на вебсайте NYCHA на английском, испанском, русском и китайском языках.

Отправьте имейл по адресу: annualplancomments@nycha.nyc.gov, если вы хотите ознакомиться с сопроводительными документами к проекту Значительной поправки к Годовому плану на FY 2021 и проекту Годового плана на FY 2022.



КОММЕНТАРИИ ОБЩЕСТВЕННОСТИ

Общественность приглашается предоставить комментарии по поводу проекта Значительной поправки к Годовому плану агентства на FY 2021 г. и проекту Годового плана агентства на FY 2022 на публичном слушании, которое состоится во вторник, 27 июля 2021 г. с 5:30 до 8:00 часов вечера. Для сдерживания распространения COVID-19, NYCHA будет проводить это публичное слушание в дистанционном формате (удаленно).



Для участия в слушании: чтобы принять участие в слушании, зарегистрируйтесь на сайте <http://on.nyc.gov/july-public-hearing>. Мы рекомендуем вам зарегистрироваться как можно скорее. Инструкции по участию, а также материалы собрания будут размещены перед его проведением на сайте on.nyc.gov/nycha-annual-plan. Чтобы принять участие по телефону, когда начнется слушание, наберите 888 788 0099 и введите идентификационный номер вебинара (ID): 890 8042 1683.

Будут доступны услуги устного перевода на испанский, русский, китайский языки и американский язык жестов. Принимающие участие в собрании по телефону и нуждающиеся в переводческих услугах жильцы могут позвонить по тел. 646-838-1534 и набрать следующие ID: испанский: 776 457 258#, китайский: 920 091 465#, русский - 608 916 567#.

Тех, кто не намерен участвовать в нем активно, приглашают посмотреть его в прямом эфире в YouTube или запись, которая будет размещена после собрания на сайте NYCHA on.nyc.gov/nycha-annual-plan.



Запрос на выступление: Любой желающий выступить по вопросам, связанным с проектом Значительной поправки к Годовому плану на FY 2021 и проектом Годового плана на FY 2022, должен подать запрос на выступление по имейлу on.nyc.gov/public-hearing-speaker-signup или по тел. 212-306-3335. Чтобы дать возможность высказаться другим, всех выступающих просят ограничить свое выступление тремя минутами.

Письменные отзывы по поводу проекта Значительной поправки и Годового плана приветствуются. Чтобы их учли, они должны быть получены по почте (United States Postal Service mail) или факсу не позднее 30 июля 2021 г. Комментарии принимаются по факсу (212) 306-8888, по почте (адрес указан ниже) или имейлу по адресу: annualplancomments@nycha.nyc.gov

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



Запросы на приемлемую модификацию (reasonable accommodation) должны быть отправлены до 20 июля 2021 г. по имейлу annualplancomments@nycha.nyc.gov или поданы по тел. 212-306-3335.

Bill de Blasio, мэр

Gregory Russ, председатель и исп. директор



New York City Housing Authority Draft Significant Amendment to the Fiscal Year (FY) 2021 Annual Plan and the FY 2022 Draft Annual Plan

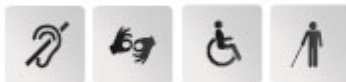
The public is invited to comment on the Draft Significant Amendment to the FY 2021 Annual Plan and the FY 2022 Draft Annual Plan at a public hearing on **Tuesday July 27, 2021, from 5:30 p.m. to 8 p.m.** To help contain the spread of COVID-19, NYCHA will hold this public meeting remotely. The Draft Significant Amendment to the FY 2021 Annual Plan and the FY 2022 Draft Annual Plan will be available online: on.nyc.gov/nycha-annual-plan and at the management office of every NYCHA public housing development during regular business hours.

To attend the hearing, please register at on.nyc.gov/july-public-hearing. To attend the meeting by phone, you may dial 888 788 0099 at the time of the hearing and enter Webinar ID: 890 8042 1683.

Interpretation services will be available on Zoom in Spanish, Chinese, Russian, and American Sign Language. Those attending by phone who require foreign language interpretation may dial **646-838-1534** and the following ID numbers at the time of the hearing for live interpretation: Spanish- 776 457 258#, Chinese: 920 091 465#, Russian: 608 916 567#.



If you would like to speak on the items related to the public hearing, please sign up at on.nyc.gov/public-hearing-speaker-signup or by calling **212-306-3335**. Full details are here: on.nyc.gov/nycha-annual-plan.



Requests for reasonable accommodations should be made by July 20, 2021, by emailing annualplancomments@nycha.nyc.gov or calling 212-306-3335.



Borrador de la Enmienda Significativa al Plan Anual de la Agencia para el Año Fiscal 2021 y el Borrador del Plan de la Agencia para el Año Fiscal 2022 de la Autoridad de Vivienda de la Ciudad de Nueva York

Se invita al público a ofrecer sus comentarios respecto al Borrador de la Enmienda Significativa al Plan Anual del Año Fiscal 2021 y al Borrador del Plan Anual del Año Fiscal 2022 en una audiencia pública a realizarse el **martes 27 de julio de 2021, de 5:30 p.m. a 8 p.m.** Para ayudar a contener la propagación del COVID-19, NYCHA llevará a cabo esta reunión pública a distancia. El Borrador de la Enmienda Significativa al Plan Anual del Año Fiscal 2021 y el Borrador del Plan Anual del Año Fiscal 2022 estarán disponibles en línea, en: on.nyc.gov/nycha-annual-plan y en la oficina de administración de cada residencial de vivienda pública de NYCHA, durante el horario laboral habitual.

Para participar en la audiencia pública, por favor, regístrese en: on.nyc.gov/july-public-hearing. Para participar en la reunión por teléfono, puede marcar el número 888 788 0099 a la hora de la audiencia pública e introducir el número de identificación o ID (por sus siglas en inglés) del seminario web: 890 8042 1683.

Habrán servicios de interpretación en Zoom, en español, chino, ruso y en lengua de signos americana. Aquellas personas que participen por teléfono y necesiten interpretación en un idioma extranjero pueden marcar el número **646-838-1534** y los siguientes números de identificación o ID, en el momento de la audiencia pública, para obtener interpretación en directo: español- 776 457 258#, chino 920 091 465#, ruso: 608 916 567#.



Si desea intervenir en los puntos relacionados con la audiencia pública, por favor, inscríbese en: on.nyc.gov/public-hearing-speaker-signup o llame al **212-306-3335**. Los detalles completos están aquí: on.nyc.gov/nycha-annual-plan.



Las solicitudes de adaptaciones especiales razonables deben hacerse antes del 20 de julio de 2021, enviando un correo electrónico a: annualplancomments@nycha.nyc.gov, o llamando al 212-306-3335.



紐約市房屋局「2021財政年度機構計劃」重大修正案初稿和「2022財政年度機構計劃」初稿

誠邀各界人士參加紐約市房屋局(NYCHA)於2021年7月27日,星期二,下午5時30分至晚上8時召開的公共聽證會,對「2021財政年度機構計劃」重大修正案初稿和「2022財政年度機構計劃」初稿發表意見。為遏制COVID-19新冠疫情的傳播, NYCHA 將以視訊形式舉行此次公共會議。民眾可登陸網址: on.nyc.gov/nycha-annual-plan 或於正常辦公時間前往NYCHA轄下公共房屋住宅區管理處辦公室索取「2021財政年度機構計劃」重大修正案初稿和「2022財政年度機構計劃」初稿。

請上網登記報名參加公共聽證會, 網址: on.nyc.gov/july-public-hearing。通過電話參加會議人士可於會議進行期間撥打電話號碼: 888 788 0099, 接通後輸入會議密碼: 890 8042 1683。

通過Zoom軟件召開的網絡會議將提供西班牙語, 中文, 俄語和手語翻譯服務。通過電話參加會議且需要外語傳譯服務人士可於會議進行期間撥打電話號碼: **646-838-1534**並於接通後輸入相應語言的會議密碼收聽同聲傳譯: 西班牙語: 776 457 258#, 中文: 920 091 465#, 俄語: 608 916 567#。



如果您想要在公共聽證會上對相關議題發表意見, 請提前上網: on.nyc.gov/public-hearing-speaker-signup 或致電: **212-306-3335** 登記。登陸網址了解詳情: on.nyc.gov/nycha-annual-plan。



如果需要合理便利措施安排, 請於2021年7月20日之前通過電郵: annualplancomments@nycha.nyc.gov 或電話: 212-306-3335提出申請。



纽约市房屋局「2021财政年度机构计划」重大修正案初稿和「2022财政年度机构计划」初稿

诚邀各界人士参加纽约市房屋局(NYCHA)于**2021年7月27日，星期二**，下午5时30分至晚上8时召开的公共听证会，对「2021财政年度机构计划」重大修正案初稿和「2022财政年度机构计划」初稿发表意见。为遏制COVID-19新冠疫情的传播，NYCHA 将以视讯形式举行此次公共会议。民众可登陆网址：on.nyc.gov/nycha-annual-plan 或于正常办公时间前往NYCHA辖下公共房屋住宅区管理处办公室索取「2021财政年度机构计划」重大修正案初稿和「2022财政年度机构计划」初稿。

请上网登记报名参加公共听证会，网址：on.nyc.gov/july-public-hearing。通过电话参加会议人士可于会议进行期间拨打电话号码：888 788 0099，接通后输入会议密码：890 8042 1683。

通过Zoom软件召开的网络会议将提供西班牙语，中文，俄语和手语翻译服务。通过电话参加会议且需要外语传译服务人士可于会议进行期间拨打电话号码：**646-838-1534**并于接通后输入相应语言的会议密码收听同声传译：西班牙语：776 457 258#，中文：920 091 465#，俄语：608 916 567#。



如果您想要在公共听证会上对相关议题发表意见，请提前上网：on.nyc.gov/public-hearing-speaker-signup 或致电：**212-306-3335** 登记。登陆网址了解详情：on.nyc.gov/nycha-annual-plan。



如果需要合理便利措施安排，请于2021年7月20日之前通过电邮：annualplancomments@nycha.nyc.gov 或电话：**212-306-3335**提出申请。



Проект Значительной поправки жилищного управления г. Нью-Йорка (New York City Housing Authority, NYCHA) к Годовому плану агентства на 2021 финансовый год (FY 2021) и проект Годового плана агентства на FY 2022

Общественность приглашается предоставить комментарии по поводу проекта Значительной поправки (Significant Amendment) к Годовому плану агентства на FY 2021 г. и проекта Годового плана агентства на FY 2022 на публичном слушании, которое состоится во вторник, **27 июля 2021 г. с 5:30 до 8:00 часов вечера**. Для сдерживания распространения COVID-19, NYCHA будет проводить слушание в дистанционном формате (удаленно). Также эти документы можно найти в онлайн: on.nyc.gov/nycha-annual-plan и в офисе управления каждого жилищного комплекса NYCHA в обычные приемные часы.

Чтобы принять участие в слушании, зарегистрируйтесь на сайте on.nyc.gov/july-public-hearing. Чтобы принять участие по телефону, когда начнется слушание, наберите 888 788 0099 и введите идентификационный номер вебинара (ID): 890 8042 1683.

Будут доступны услуги устного перевода на испанский, русский, китайский языки и американский язык жестов. Принимающие участие в собрании по телефону и нуждающиеся в переводческих услугах жильцы могут позвонить по тел. **646-838-1534** и набрать следующие ID: Испанский - 776 457 258#, Китайский - 920 091 465#, Русский - 608 916 567#.



Если вы хотите высказаться по вопросам, связанным с публичным слушанием, зарегистрируйтесь на сайте on.nyc.gov/public-hearing-speaker-signup или по тел. **212-306-3335**. Более подробная информация здесь: on.nyc.gov/nycha-annual-plan.



Запросы на приемлемую модификацию (reasonable accommodation) должны быть отправлены до 20 июля 2021 г. по имейлу: annualplancomments@nycha.nyc.gov или поданы по тел. 212-306-3335.

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Executive Summary

NYCHA's Final Agency Plan for FY 2022

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 outlining its major initiatives for the coming year.

The Final Agency Plan for Fiscal Year 2022 is available for public review on NYCHA's website: <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 development's Resident Association President.

NYCHA held a virtual public hearing on July 27, 2021 and accepted written comments on the Draft Agency Plan through July 30, 2021. Please see the Notice on page 10. NYCHA met with the Resident Advisory Board members for their comments in six meetings between March and September 2021.

NYCHA's Final Agency Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) by October 18, 2021. Following NYCHA's submission, HUD has 75 days to review and approve the plan.

NYCHA's priorities for the coming year are outlined on pages 21 through 31. Through its *Blueprint for Change* proposals, NYCHA aims to strengthen its business model (*Blueprint's* Transformation Plan) and raise much-needed capital funding for its developments (*Blueprint's* Stabilization Plan). In January 2019, NYCHA and the City of New York signed an Agreement with the U.S. Department of Housing and Urban Development (HUD), which outlined specific deadlines and objective compliance standards for making significant improvements in several high-priority areas, including lead-based paint, mold, heat, elevators, annual inspections, pests, and waste management. NYCHA is committed to achieving these deadlines, and updates for each of these high-priority areas are highlighted below. With NYCHA's capital projects work, the Authority is investing in projects outlined in its recently approved City Capital Action Plan, initiatives that are already underway, and projects focused on environmental resiliency and sustainability. Finally, NYCHA continues to pursue NYCHA 2.0 initiatives that fund vital building and apartment upgrades while also exploring innovative strategies to build new 100% affordable housing.

A Blueprint for Change

A Blueprint for Change charts how NYCHA will strengthen as an organization and improve the quality of life for its residents by comprehensively renovating their buildings and protecting their full rights and protections permanently. *Blueprint* includes a **Transformation Plan**: a top-to-bottom reorganization of NYCHA, with proposed strategies for restructuring NYCHA's business model and operations to improve the delivery of services to residents. *Blueprint* also includes a **Stabilization Plan**: ideas for raising much-needed capital funding using a Public Housing Preservation Trust that can completely rehabilitate the Authority's developments while keeping them fully and permanently public and affordable – investments that will also generate job and job training opportunities for residents.

Transformation Plan and NYCHA's Monitoring Agreement

On January 31, 2019, NYCHA and the City of New York signed an Agreement with HUD. The Agreement's overarching goal is to remedy the deficient physical conditions in NYCHA properties

to benefit residents across the city. It establishes a foundation for NYCHA to continue strengthening the Authority and improving residents' quality of life. The Agreement sets objectives to significantly improve in seven high-priority areas: lead-based paint, mold, heat, elevators, inspections, pests, and waste management.

The work undertaken as part of the Agreement is overseen by a third-party federal Monitor. The efforts include, for instance, conducting visual assessments and completing interim controls for lead-based paint each calendar year, improving the response times for heat and elevator outages, completing capital improvements to replace aging boilers and elevators, remediating mold conditions and preventing mold recurrence, and utilizing Integrated Pest Management practices. To achieve these objectives, NYCHA is making a variety of operational improvements and capital investments, as described below.

The Transformation Plan was conceived as part of the 2019 HUD Agreement and includes a set of strategies that will improve the resident experience and set the agency on a path to a stronger future.

On March 8, 2021, NYCHA released its Transformation Plan, a vision for significant yet sustainable change to NYCHA's governance and leadership structure, property management systems, and central support functions. The release of the Transformation Plan marks the beginning of a multi-year process. In partnership with residents and stakeholders, NYCHA now will turn to the challenging task of reviewing, testing, and implementing these structural and process changes in a resource-constrained environment.

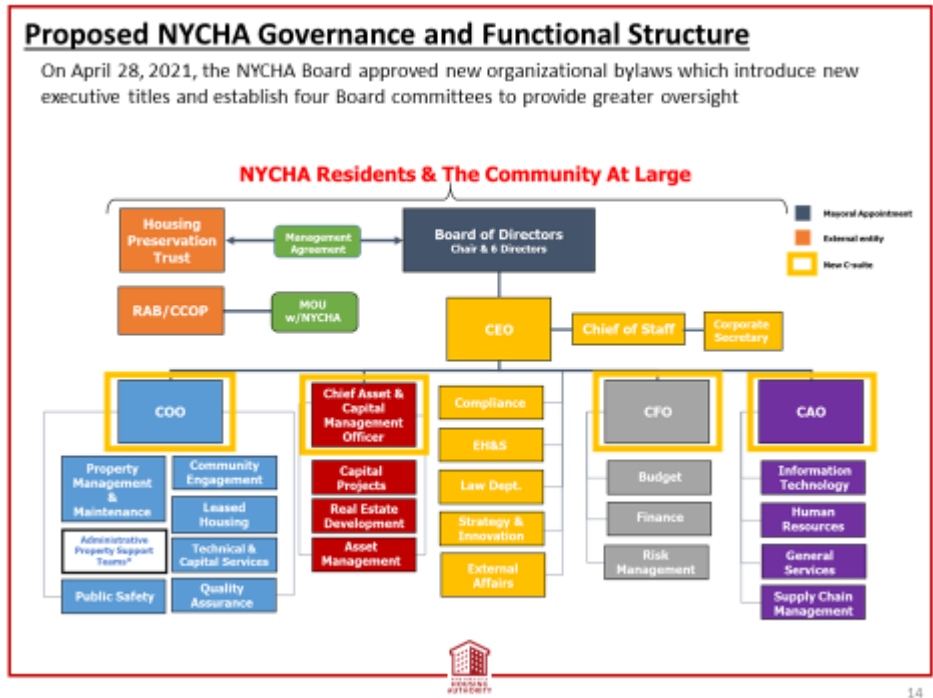
HUD and the United States Attorney's Office for the Southern District of New York (SDNY) have concurred to the Transformation Plan. NYCHA, HUD, SDNY, the federal Monitor, residents, and other stakeholders will now focus on analysis and implementation efforts. This includes evaluating the costs and benefits of each possible change and beginning to make difficult choices that are necessary to better serve residents. These results, based on modelling and analysis, will be submitted in an Implementation Plan as a supplement to the Transformation Plan. The first part of the Implementation Plan will be submitted to HUD, the federal Monitor, and SDNY for review and approval by the end of 2021. The second part is due at the end of June 2022. Together, the Transformation Plan and the Implementation Plan will result in the Organizational Plan required under the HUD Agreement.

As of spring 2021, NYCHA has begun implementing a first group of priority projects from the Transformation Plan and has started drafting the Implementation Plan. The priority projects include key changes to NYCHA's operating model, as well as numerous business process improvements that focus on service delivery pain points identified by residents and employees. The full descriptions and scope of work of all projects, including schedule and stakeholders, will be part of the September 2021 Implementation Plan.

Resident-facing business process changes include: a full revamping of our repair and work order management process, an updated more user-friendly annual recertification process, changes to our approach to janitorial work and cleanliness, and a new approach to lease enforcement issues at developments. In addition, NYCHA is also pursuing a set of back office reforms, including a comprehensive asset management strategy and a restructuring of our central office support functions.

In April, the NYCHA board approved a new organizational structure, which creates a C-suite of leadership and modifies some existing roles. This structure will enable additional accountability

across the organization and better coordinates existing functions. The approved organization chart is below:



Stabilization Strategy

NYCHA’s Stabilization Strategy proposes creating a new public entity – the Public Housing Preservation Trust – to improve residents’ homes while protecting their rights.

The State-created Public Housing Preservation Trust would transform residents’ homes by expediting massive, historic levels of rehabilitation and accessing new, more stable funding streams. With this Trust, repairs and improvements would be made faster, and the properties would receive more funding through switching from traditional Section 9 public housing subsidy to the more reliable and valuable Tenant Protection Vouchers (TPV), a project-based Section 8 subsidy. NYCHA would remain the permanent owner of the properties, and a long-term ground lease with the Trust would allow NYCHA to raise money for major rehabilitations. With the additional subsidy from the TPVs, NYCHA could raise funds through bonds and loans to pay for the top-to-bottom renovations. Debt obligations would be paid back using the additional TPV subsidy that NYCHA would receive each year.

The Public Housing Preservation Trust would be able to make higher quality repairs in a shorter period of time by using the more flexible procurement methods outlined in the legislation that would authorize the Trust. The Public Housing Preservation Trust would oversee the construction work and contract back to NYCHA for day-to-day management of the properties.

Through the Public Housing Preservation Trust, NYCHA would make all necessary major repairs at the properties. This means new kitchens and bathrooms (including appliances and fixtures), boilers and heating systems, elevators, building pipes, ventilation systems, facades, and high-security front doors. It also means addressing lead, mold, leaks, and pests and improving waste management – creating healthier homes for residents. State law, along with applicable federal laws and regulations, would guarantee full tenant rights and protections. No residents would be displaced.

NYCHA is in the process of engaging residents and other stakeholders around the ideas outlined in *Blueprint for Change*, including the Public Housing Preservation Trust. Since December 2020, NYCHA has held small group meetings with all active Resident Associations, hosted weekly town halls open to all residents as well as development-specific town halls, sent mailings to all residents (which are also available at management offices), and posted development flyers. This resident engagement will continue NYCHA-wide as well as on a property-by-property level over the coming year.

In June 2021, the New York State Senate and Assembly paused legislation that would have created the Public Housing Preservation Trust. Through continued engagement with residents and other stakeholders, NYCHA will further refine the *Blueprint* plan, and will continue working with its elected official partners to help pass this vital legislation in the 2022 session.

Additional information on *Blueprint* and NYCHA's resident and stakeholder engagement is available on NYCHA's website: <https://www1.nyc.gov/site/nycha/residents/blueprint-for-change.page>.

A Culture of Compliance

As required under the Agreement with HUD, NYCHA established new departments and units – a Compliance Department, an Environmental Health and Safety Department, and a Quality Assurance Unit – which have established programs for monitoring NYCHA's work at its developments, making recommendations for improvements and then providing technical assistance to development staff to improve performance. In the coming year, NYCHA will continue to scale up these departments and units while using data-centered risk assessments, sampling, and field monitoring to ensure Operations complies with all local, state, and federal regulations and internal policies and procedures.

Compliance Pillar Areas

The Agreement requires NYCHA to remediate living conditions at its properties by specific deadlines and to meet strict, objective compliance standards regarding the aforementioned high-priority areas of lead-based paint, mold, heat, elevators, inspections, pests, and waste management. NYCHA is setting up systems and has established a dedicated unit, Strategy & Innovation, to track its progress on all the deadlines outlined in the Agreement. NYCHA is also building dashboards and other analytical reporting tools for each pillar area to show progress towards meeting these metrics. If any managing jurisdiction is not meeting the clearly defined data-driven benchmarks, they will need to design a plan – in partnership with their colleagues in other departments – to solve the problem.

As part of the Agreement, the City is providing \$1 billion for capital improvements over the first four years and \$200 million per year in capital funding for at least the six years following – for a total of at least \$2.2 billion in capital funding. These funds, described in detail in the City Capital Action Plan recently approved by the Federal Monitor, will be invested in lead abatement, comprehensive lead- and mold-related capital projects, elevator and heat system replacements, and improvements to NYCHA's waste management equipment across the portfolio.

These funds are in addition to Mayor de Blasio's unprecedented financial support to NYCHA, which includes approximately \$4.3 billion in capital and operating funds to replace roofs and boilers, fix facades and upgrade heating systems, and more over the next decade.

The Agreement goals, as well as other priority areas, are outlined in the Goals Section of the Final Agency Plan (pages 175 to 193). The following text includes examples of progress in Compliance Pillar Areas to date, as well as anticipated future progress.

Lead-Based Paint:

In April 2019, NYCHA kicked off an unprecedented effort to test approximately 135,000 apartments for the presence of lead-based paint using x-ray fluorescence (XRF) analyzers and is on track to complete testing by December 2021. NYCHA has attempted to test 113,835 units and completed tests in 101,729 units (89.3%) as of September 17, 2021. NYCHA will also continue its door-knocking campaign to identify units where a child under 6 years old either resides or regularly visits the unit for more than 10 hours a week.

In 2021, NYCHA completed its lead-based paint biennial risk assessment and is beginning re-evaluation activities. NYCHA has also been scaling up efforts to abate or rapidly remediate lead in units with a positive or presumed positive lead-based component where a child under 6 either resides or regularly visits the unit for more than 10 hours a week. Per its Lead Action Plan, NYCHA developed a Team for Enhanced Management, Planning, and Outreach (TEMPO) for apartments with a child younger than 6 years old with known or presumed lead-based paint. NYCHA commenced abatement in TEMPO apartments with fewer than two positive components and has been deploying the team to conduct repair work orders while utilizing enhanced assessment, clearance, interim controls and oversight protocols in TEMPO apartments with three or more positive components. In addition, NYCHA will be conducting two rounds of visual assessments in TEMPO units.

Mold:

In September 2019, NYCHA completed the roll out of the *Mold/ Mildew Control in NYCHA Residential Buildings Standard Procedure* (“Mold SP” or “Mold Busters SP”) and by the end of that year trained all the staff Authority-wide. In July 2021, NYCHA published the *Roof Fan Inspections at NYCHA Residential Buildings Standard Procedure* (Roof Fan SP). In 2022, NYCHA intends to roll out the *Leak and Moisture Control in NYCHA Residential Buildings Standard Procedure* (“Leak SP”). NYCHA is installing new roof fans to prevent mold conditions, adding staff and/or vendor capacity to address mold and leak work orders, and continuing to train existing and new staff on the Mold Busters Standard Procedure. NYCHA is on pace to complete installations of more than 8,000 roof fans and cleaning lateral ventilation systems in more than 100,000 units in 2022. NYCHA is also using new dashboards and other analytical tools to deploy staff as well as to determine which management jurisdictions are failing to respond quickly to mold complaints or have recurring mold conditions in residents’ units. However, NYCHA recognizes that fully addressing the root causes of mold will require significant, comprehensive capital investment in properties. It is important to note, though, that addressing mold and leaks in NYCHA’s developments in the long-term requires sustained investments of capital and comprehensive upgrades in addition to the more immediate operational and maintenance work currently being undertaken. Many of NYCHA’s buildings are in a general state of disrepair with years, if not decades, of deferred maintenance. Many persistent mold and moisture issues within NYCHA buildings are, at their core, capital issues that are symptomatic of buildings that have not received the regular reinvestment that all buildings require. The majority of NYCHA’s buildings are more than a half century old and have not received the needed major capital improvements vital to their infrastructure. NYCHA’s decades-old buildings are in such a deteriorated condition that they need about \$40 billion to bring them to a state of good repair – an overwhelming figure that increases by about \$1 billion a year. To address each of the factors that have led to mold growth, leaks and moisture complaints, NYCHA needs to invest in the comprehensive modernization of all the properties with chronic mold and leak problems across its entire portfolio.

In addition, over the next year, NYCHA will work on the following goals:

- Decreasing mold incidence and recurrence;
- Working towards improving the compliance metrics on inspection, mold removal, remediation, and completing repairs;
- Continuing to train staff on the Mold Buster process (including *Refresher* training);
- Rolling out the Leak Standard Procedure and begin training staff on the enhanced leak inspection process.
- Implementing a mold awareness and educational campaign; and
- Providing improvements with exhaust ventilation by replacing roof fans where needed and cleaning vents inside apartments.

Heat:

In the 2019-2020 heat season, heat outages were resolved in 7.7 hours. NYCHA improved its performance in the 2020-2021 heating season with an average duration of 7.33 hours. 99.8% of outages were resolved within 24 hours and no outage lasted over 48 hours. These improvements can be attributed to the continued utilization of a heating team dedicated to resolving service interruptions 24/7, the activation of a “Situation Room” during periods of extreme cold to coordinate the response to interruptions and mobilization of resources in real time, and the constant monitoring of outage data through the use of dashboards and reports to identify issues proactively.

Prior to and throughout each heating season, NYCHA’s Heating Management Services Department (HMSD) develops a list of operational improvements that consist of heat-and-hot-water-generating and ancillary equipment needing replacement or extensive repair. As part of this ongoing operational investment strategy, NYCHA has identified 177 projects totaling \$22,015,103.83. To date, NYCHA has completed \$5,150,433.71 in equipment improvements, and has active purchase orders for the remaining \$16,864,670.12 that NYCHA seeks to complete before the end of 2021.

Additionally, prior to the start of the 2020-2021 heating season, NYCHA:

- Added one trade Supervisor to focus and streamline plumbing and other trade-related repairs.
- On January 4, 2021, transferred 16 additional plumbing teams and 2 Plumbing Supervisors from the Maintenance, Repairs, and Skilled Trades Department (MRST) to HMSD. This strategy gave HMSD full control of its plumbing workforce, enabling NYCHA to add additional evening plumbing teams and overnight teams when a cold spell is expected.
- Procured two skilled labor and material contracts, which provided additional skilled labor resources during emergencies or as needed. These consisted of:
 - a \$5M Plumbing Labor and Material requirement contract, and
 - a \$5M Electrical Labor and Material requirement contract.
- Procured six new mobile boilers, receiving four of these during this most recent heating season. These include:
 - one 100 HP mobile boiler, and
 - five 600 HP mobile boilers.

NYCHA completed its installation of heat sensors at 44 developments and is now expanding its installation of Building Management Systems to other sites. NYCHA will work to make additional year-over-year improvements to its heat outage response times in the coming heat season. By 2026,

NYCHA will replace 297 boilers and address an additional 200 boilers through its Permanent Affordability Commitment Together (PACT) housing preservation initiative, making heat more reliable for hundreds of thousands of residents. Since the HUD Agreement was signed in 2019, NYCHA has turned over 60 new boilers at 21 developments. NYCHA projects 41 boiler replacements for completion in 2021 and 25 boiler replacements in 2022.

Elevators:

NYCHA continues to strive to make improvements to its elevator operations. NYCHA is continuing to hire and train additional elevator mechanic teams while also investing in air conditioners in motor rooms, door lock monitors, and other equipment that will help improve elevator service. By 2024, NYCHA will replace or address 425 elevators. There are 316 elevators in active replacement status as of 2021. One of these elevators has been replaced and put back into service, and another is scheduled for replacement later in 2021. An additional 84 elevators are scheduled to be replaced in 2022. Additional updates include:

- The increase of average service restoration time from 10.34 hours in 2020 to 11 hours in 2021.
- The implementation of NYCHA's Elevator Motor Room Air Conditioner Installation Initiative. As of September 10, 2021, 2,110 out of 2,294 air conditioning units have been installed (92% completed) with the assistance of MRST and Elevator Services and Repairs Department (ESRD) staff. The implementation of Door Lock Monitoring (DLM) Installation (NYC DOB-Mandated Code).
- As of August 16, 2021, 3,043 elevators have been installed (97% completed) with Door Lock Monitoring Units, with 93 pending installation. NYCHA's elevator in-house staff and vendors continue to perform this DLM installation work.
- ESRD has also successfully submitted and awarded a contract to install Remote Elevator Management Systems (REMS) at 200 elevators. The REMS contract was approved at the May 26, 2021 Board Meeting. The vendor is currently complying with the contract start up requirements and the work is projected to start in October 2021.

Pests and Waste Management:

In January 2021, NYCHA launched a new Integrated Pest Management (IPM) standard procedure across its portfolio that sets new standards for pest management. NYCHA will continue training its workforce on proper pest control methods for exterminators. Training will also be provided to non-pest control staff since IPM requires that grounds staff and skilled trades fix issues causing pests such as a lack of exclusion and good waste management practices.

NYCHA also established a new Waste Management and Pest Control Department to manage these workflows across the Authority. By 2022, NYCHA plans to hire 15 more exterminators; reduce rat burrows by 70%; respond to 75% of all rat complaints within 2 business days, and to all rat complaints within 5 days; respond to 75% of all other pest complaints within 7 days, and to all other pest complaints within 10 days; and implement new digital reporting methods. NYCHA is also establishing enhancements to its IT system to automate follow-ups for pest infestations that require more than one visit. NYCHA is also investing in reducing the rat population by concreting 50 dirt basements, installing 8,000 door sweeps, and installing new compactors and bulk crushers at 10 developments. To advance NYCHA's Waste Management Plan, Design Build Requests for Proposals (RFP) were released in 2021 for seven waste yard redesigns and a new pneumatic waste collection system for Polo Grounds Towers. The contracts are targeted for award in April 2022, with all to start construction in 2022. By 2028, waste yards will be completely overhauled at 194 developments.

Public Housing Assessment System (PHAS) and Annual Inspections:

As of August 2021, NYCHA has made progress in the following key areas:

- Completion of the first phase of PHAS/Uniform Physical Condition Standards (UPCS) standards training (three-day class) for Maintenance Workers and supervisors, and launch of a two-day version of the training for Caretakers;
- Completion of the pilot program for supervisory inspections of buildings and grounds; and
- Completion and roll-out of a new standard procedure for Annual Apartment Inspections.

In FY 2021 – FY 2022, NYCHA will focus on the following initiatives:

- Completing PHAS/UPCS standards training for Caretakers and launching a three-hour refresher course for existing staff, as well as an ongoing bi-annual course for new employees;
- Rolling out the supervisory inspection for buildings and grounds to proactively identify potential deficiencies and prevent against deceptive practices; and
- Completing PHAS dashboard and Annual Apartment Inspection dashboard to identify anomalies and track progress.

Other Capital Projects

In addition to the capital funding outlined in the City Capital Action Plan, NYCHA also continues to invest additional federal and City capital funds in other high-priority initiatives.

Community Partnership: Basketball Courts:

As part of an initiative to build trust and community relationships, the NYPD is investing in NYCHA neighborhoods by building and/or upgrading basketball courts at 14 locations. With \$4M in funding made possible through the District Attorney of New York asset forfeiture process, NYCHA has designed and will complete the courts in 2021. This placemaking approach builds on NYCHA's Connected Communities program, which uses participatory design to activate and improve open space connections at NYCHA developments.

Recovery & Resilience:

As of the end of Q2 2021, NYCHA had invested over \$2.2 billion in the 35 developments most severely impacted by Superstorm Sandy. Completed work includes 6 new heat and hot water systems serving almost 2,700 units, 185 roofs replaced, 61 full-power backup generators operational, and storm surge protection installed at 12 developments ahead of the 2021 hurricane season. NYCHA is releasing a Draft Climate Adaptation Plan identifying the main climate hazards threatening its portfolio and residents. During the summer of 2021, the department is engaging with a cohort of residents for input on finalizing the strategies for addressing sea level rise and coastal storms, extreme heat, and extreme rain, among other risks. This year, NYCHA will launch the development of a screening tool which ensures that climate hazards are considered in the planning of all capital projects. NYCHA is pursuing resources to invest in the health of its urban forest, starting with an inventory of trees, and pursuing funding to expand the in-house expertise on tree preservation and replacement. NYCHA is analyzing the costs and benefits of including stormwater management and heat mitigation in outdoor space renovations. NYCHA is pursuing all available funding sources for resiliency, including via the newly expanded FEMA Building Resilient Infrastructure and Communities program, by developing compelling resiliency plans that maximize co-benefits to residents.

Energy & Sustainability:

NYCHA is releasing a new Sustainability Agenda to outline its commitment to healthy and comfortable homes that showcase environmental stewardship and sustainable design. A stakeholder engagement process was conducted from May until August and a final version will be released during Climate Week in September 2021. NYCHA is committing to host 30 megawatts of renewable energy on public housing by 2026 and the Authority's first two solar roof leases for 3 MW of rooftop solar are currently in the final stages of construction. In 2021, NYCHA also kicked off construction of the next batch of \$70M in green infrastructure projects totaling \$70M that are in design or under construction in partnership with the NYC Department of Environmental Protection. There are currently \$310M active Energy Performance Contracts, and \$15M in weatherization upgrades are completed or in construction. Design is 60% complete for NYCHA's RetrofitNY project, which involves panelized cladding and heat pumps at one building in Ravenswood Houses. NYCHA has also begun a demonstration project to fully electrify 1471 Watson Avenue with heat pumps, induction stoves, and point-of-use water heaters in each apartment.

Comprehensive Modernization

As highlighted in the earlier sections, NYCHA initiated significant capital repairs in many developments that will be completed over the next few years. These and previous capital projects have been predominantly component-level replacements and upgrades. Moving forward, NYCHA aims to transition to more integrated and comprehensive renovations spanning multiple building systems, interiors and exteriors, and grounds improvements, wherever feasible. This will allow developments to be comprehensively renovated more quickly, at a higher quality, and with better value for money. A comprehensive modernization approach will also holistically address the HUD Agreement pillar areas and the broader needs of residents and reduce NYCHA's comparatively high operations and maintenance costs. NYCHA intends to pursue this approach for any new influxes of funding, whether through the *Blueprint for Change*, additional federal capital funding, or sources of capital funds from other levels of government. As outlined in the Transformation Plan, all capital investment will fall under the purview of one department and position: the Chief Asset and Capital Management Officer (CACMO).

NYCHA 2.0

Considering the multibillion-dollar decline in federal Section 9 funding and massive repair needs across its portfolio, NYCHA must pursue innovative ways to fund the building and apartment upgrades that residents deserve. Launched in December 2018, NYCHA 2.0 is a 10-year plan to address \$24 billion in vital repairs that NYCHA's buildings desperately need. NYCHA 2.0 includes the following programs:

PACT to Preserve

As part of its Permanent Affordability Commitment Together (PACT) initiative, NYCHA is addressing \$12.8 billion in overdue repairs in 62,000 apartments – a third of its units and home to approximately 140,000 New Yorkers. PACT relies on partnerships with private and non-profit development partners and converts developments to a more stable, federally funded program called Project-Based Section 8.

All 62,000 apartments converted to Section 8 funding will remain permanently affordable. The Project-Based Section 8 program provides a more stable flow of federal subsidy and allows NYCHA

and its development partners to raise external financing to address a development's capital repair needs. Once developments are converted, quality private managers, including non-profit partners, will maintain and operate the buildings. The PACT program provides residents with important rights and protections. Residents will only pay 30 percent of their household income towards rent, will not have their applications re-screened, and will have the right to remain in their homes during the renovations.

Renovations will provide residents with new kitchens, bathrooms, windows, and common areas while addressing critical repairs to elevators, boilers, roofs, and facades. The PACT program also enhances on-site social services by funding valuable community programming that will be provided by a growing list of non-profit partners. PACT renovations will be completed on a rolling basis – between 7,500 and 10,000 apartments per year – by the year 2028.

Approximately \$579 million in renovations have been completed at more than 3,200 apartments in Queens and the Bronx. An additional 6,300 apartments, home to approximately 13,600 New Yorkers, are under construction in the Bronx and Brooklyn, totaling \$1.2 billion in major upgrades. An additional 20,500 units are part of active development projects in the process of resident engagement or pre-development. In sum, NYCHA has approximately 30,000 units completed, in-construction, or in a stage of resident engagement or pre-development.

Build to Preserve

With the "Build to Preserve" program, NYCHA will use a mixed-income model to build on its underused land, dedicating 100 percent of the proceeds to make repairs first at the surrounding development (any remaining funds will be invested in repairs at other NYCHA developments in the neighborhood). Build to Preserve is expected to fund approximately \$2 billion in capital repairs. New buildings will be subject to Mandatory Inclusionary Housing levels of affordability and will increase the city's permanently affordable housing supply.

NYCHA released an RFP in April 2021 to implement a community-driven preservation and investment strategy at Fulton, Chelsea, Chelsea Addition, and Elliott Houses in the Chelsea neighborhood of Manhattan. The four developments, which include 2,073 apartments across 24 buildings, have an estimated total of \$366 million in extensive capital need and repair costs ranging from heating infrastructure to building security improvements. NYCHA anticipates selecting partners by the end of 2021.

In developing the RFP, NYCHA and resident leaders worked to incorporate the recommendations of the Chelsea Working Group – a cohort of residents, elected officials, community representatives, and housing and legal organizations – which convened regularly since late 2019 to evaluate the different options available for modernizing the properties. In February 2021, the Working Group published a set of recommendations to fund comprehensive repairs, while ensuring resident rights are protected and that residents remain deeply engaged in the planning process going forward. Among other strategies to raise revenue for repairs, the Working Group recommended that the Fulton and Elliott-Chelsea developments be included in PACT and identified appropriate locations and design guidelines for mixed-use redevelopment. As part of the RFP process, resident leaders will review proposals, interview respondent teams, and work with NYCHA to ultimately select the partners who will rehabilitate and manage the properties over the long term.

Transfer to Preserve

NYCHA continues to tap into its extensive unused development rights, known as “air rights,” to raise revenue for the Authority. By transferring only a portion of the Authority’s approximately 80 million square feet of air rights, NYCHA expects to generate \$1 billion in capital repairs for adjacent apartments. In 2020, NYCHA completed two air rights transfers, one at Ingersoll Houses in Brooklyn and another at Hobbs Court in Manhattan, generating approximately \$27 million in proceeds for capital repairs.

Commitments to Build New 100% Affordable Housing

New York City is confronting an affordable housing crisis, and New Yorkers have called for more affordable housing. In support of the City’s plan to build or preserve 300,000 affordable apartments by 2026, NYCHA has pledged to provide underused land (such as parking lots and storage spaces) for the creation of 11,000 new, affordable apartments for both families and seniors – more than 3,000 of which are already in the pipeline.

Since 2015, NYCHA has closed on 15 transactions located in the Bronx, Brooklyn, Manhattan, and Queens. To date, 2,120 affordable apartments have been built or are under construction. An additional 72 co-op homeownership units began construction at the end of 2020. NYCHA also has numerous other affordable housing developments in the planning and pre-development phases.

Many of these buildings will include community facilities and neighborhood retail that will serve new and current residents. For instance, the new affordable housing at Ingersoll Houses features a new ground-floor senior center operated by Services and Advocacy for LGBT Elders (SAGE) that provides supportive services for seniors. The development at Mill Brook Houses includes a new senior center with a commercial kitchen, large dining room, community space, and activity rooms for programming for seniors. Other planned features across the 100% affordable housing portfolio include green roofs, upgraded basketball courts, and new community gardens and seating areas.

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"> • Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures • Financial Resources • Rent Determination • Operation and Management • Community Service and Self-Sufficiency • Demolition and Disposition, Conversion of Public Housing, Homeownership, Project Based Vouchers and Rental Assistance Demonstration (RAD) 	<ul style="list-style-type: none"> • Housing Needs • Statement of Progress in Meeting Mission and Goals – FY 2020 to FY 2024 • Admissions Policy for Deconcentration • Resident Advisory Board Members • PHA Management Organizational Chart • Agendas of Meetings Held with NYCHA’s Resident Advisory Board
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B) Identify the specific locations where the public may obtain copies of the Annual PHA Plan.

The *Final Annual Plan for FY 2022* is available for public inspection at NYCHA’s principal office, located at 90 Church Street, New York, NY between the hours of 9:30 a.m. to 4:30 p.m. Please email annualplancomments@nycha.nyc.gov to schedule a time to review the Plan. *The Final Agency Annual Plan for FY 2022* 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.

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 80% of the families admitted to public housing during calendar year 2020 were 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 6 RPOs living in the following NYCHA developments: Amsterdam, Latimer Gardens, Mott Haven, Throggs Neck, Two Bridges, and Vladeck.

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 to the general public. However, as of June 2020, the waitlist was opened in part for three categories of referrals: (1) referrals from the New York City Administration for Children's Services for youth in the Family Unification Program (FUP) whose assistance is expiring as a result of the 36-month time limit on their voucher without subsequent adequate housing; (2) referrals by a prosecutorial or law enforcement agency for victims of domestic violence and intimidated witnesses; and (3) referrals from NYCHA's Public Housing Operations Department for public housing residents because their unit is not habitable, they are at risk of displacement, or they are extremely under occupied or extremely over crowded. Persons from the general public can apply 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 New York City (NYC) agencies, including referrals from ACS for FUP Youth voucher holders at risk for homelessness due to the expiration of FUP Youth assistance.
2	Victim of Domestic Violence Intimidated Witness - referred by prosecutorial or law enforcement agency
3	NYCHA public housing residents required to move because: (a) their unit is not habitable (b) they are at risk of displacement; or (c) they are extremely under occupied or extremely over crowded 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 New York City (NYC) agencies, including referrals from ACS for FUP Youth voucher holders at risk for homelessness due to the expiration of FUP Youth assistance.
2	Victim of Domestic Violence Intimidated Witness - referred by prosecutorial or law enforcement agency
3	NYCHA public housing residents required to move because: (a) their unit is not habitable (b) they are at risk of displacement; or (c) they are extremely under occupied or extremely over crowded 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”), New York City Department of Veterans’ Services (“DVS”), and Administration for Children Services (“ACS”) as required for the special program type.

Veterans Affairs Supportive Housing (“VASH”)

The Authority has a total allocation of 3,190 vouchers. NYCHA is administering VASH vouchers in partnership with the Department of Veterans Affairs (“VA”) and the New York City Department of Veterans’ Services (“DVS”). Applicants are identified, screened, and referred by the VA and DVS to NYCHA for eligibility certification and voucher issuance.

2. Financial Resources

[24 CFR Part 903.7 (c)]

Financial Resources: 2022 Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2021 grants)		
a) Public Housing Operating Fund	\$ 921,198,480	<i>Public Housing Operations</i>
b) Public Housing Capital Fund (2021 Grant)	\$601,270,521	<i>Public Housing Maintenance</i>
c) Annual Contributions for Section 8 Tenant-Based Assistance	\$ 1,466,748,989	<i>Section 8 Program Operations</i>
Other Federal Grants (list below)		
FSS Self Sufficiency	\$0	<i>Self Sufficiency Services</i>
2. Prior Year Federal Grants (unobligated funds only) (as of March 31, 2021)		
FY 2018 Capital Fund	\$5,407,941	<i>Modernization</i>
FY 2019 Capital Fund	\$132,501,814	
FY 2020 Capital Fund	\$268,251,814	
Replacement Housing Factor	\$2,113,970	<i>New affordable housing construction</i>
HOPE VI Revitalization	\$38,911	<i>New construction at Prospect Plaza</i>
Public Housing Development Grants	\$420,081	<i>Modernization of former City/State developments</i>
3. Public Housing Dwelling Rental Income (includes City and State Developments)	\$918,003,267	<i>Public housing operations, safety and security, and supportive services</i>
4. Other income (list below)		
Other Revenue from Operations (includes City and State Developments)	\$ 21,668,283	<i>Public Housing Operations</i>
Interest Income	\$2,050,653	<i>Public Housing Operations</i>
Other Categorical Grants	\$ 4,020,438	<i>Improve residents' self-sufficiency, Summer intern program, and support for Resident Watch program</i>
Miscellaneous Income (includes Debt Service)	\$253,492,719	<i>Public housing operations, safety and security, and supportive services</i>
Total Resources	\$4,597,187,881	

3. Rent Determination

[24 CFR Part 903.7 (d)]

Public Housing

(1) Income Based Rent Policies

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 the allowable rent structure under 42 U.S.C. § 1437a(a)(2)(B)(i)(I)(aa) which requires flat rents to be set no lower than 80% of the applicable fair market rent established under 42 U.S.C. § 1437f(c).

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, 2022: 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 2022 Annual Reviews (with a new rent effective date of May 1, 2022): 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 2022 Fair Market Rent	NYCHA’s FY 2022 Flat Rent
Studio	\$1,747	\$1,408
1 Bedroom	\$1,778	\$1,441
2 Bedroom	\$2,026	\$1,643
3 Bedroom	\$2,556	\$2,079
4 Bedroom	\$2,747	\$2,228
5 Bedroom	\$3,159	\$2,562
6 Bedroom	\$3,983	\$3,226

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 and standards adopted by local Section 8 administrators.

(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 email annualplancomments@nycha.nyc.gov. 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.)

Program Name	Units or Families Served at Year Beginning 2021	Expected Turnover
Public Housing	168,100	4,110
Section 8 Vouchers	88,535	2.86%
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 in select NYCHA communities. During the last grant year NYCHA increased the number of target developments under this initiative.	322 services provided to ROSS residents from reporting period of 01/01/20 to 08/22/20	N/A
ROSS Service Coordinator Grant 2019: To enhance self-sufficiency by accessing employment and other economic-related resources and opportunities to NYCHA residents through geographically-based service coordination in select NYCHA communities. This grant began on 08/23/20.	156 services provided to ROSS residents from reporting period of 08/23/20 to 12/31/20	N/A
Other Federal Programs (list individually)		
City Harvest Mobile Market Program	4,290,762 lbs. of produce to 96,293 families during calendar year 2020	N/A
Elderly Safe at Home The Elderly Safe at Home program provides services geared towards enhancing the general quality of life of elderly and nonelderly disabled residents who reside in 17 NYCHA developments. This program provides	An average of 1,797 residents served monthly	N/A

<p>on-site social services to help improve their safety & security and enhance their health & well-being and allows residents to continue to live independently in their homes and prevent premature institutionalization.</p> <p>Program Services includes: support and crime prevention, crisis intervention, and crime victim assistance to address and prevent crimes perpetrated against this vulnerable population. The program also assists residents with maintaining activities of daily living, accessing public entitlements, and coordinating services with outside providers. Residents can meet with the assigned worker in the social service office or in their homes. Workers are also expected to conduct regular home visits and telephone reassurance.</p> <p>This program also recruits and trains resident volunteers who are organized into a floor captain/buddy system and maintain daily contact with residents in their respective developments. The floor captains are the eyes and ears of the program. They are often the first to detect if something is wrong or identify an incident requiring immediate attention and are obligated to report back to program staff. This program also offers workshops on crime prevention, safety and security, and crime victims' rights and the criminal justice process. Information on these and other topics is disseminated through pamphlets and regularly scheduled meetings at program sites. Residents who need more comprehensive crime victim services are referred to community-based organizations and/or City agencies that specialize in this field.</p>	<p>during calendar year 2020</p>	
<p>Family Self Sufficiency Program:</p> <p>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.</p>	<p>960 enrollments as of 12/31/20</p>	<p>N/A</p>

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 email annualplancomments@nycha.nyc.gov for further information.

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 30, 2021, HUD approved NYCHA's request to continue to extend the designation of the elderly-only developments and buildings for an additional two years.

Designation of Public Housing Activity Description
1a. Development name: Baruch Houses Addition 1b. Development (project) number: NY005010600
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 approved , submitted, or planned for submission: July 30, 2021
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: 197 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Mary McLeod Bethune Gardens 1b. Development (project) number: NY005010030
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 approved , submitted, or planned for submission: July 30, 2021
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: 210 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Borinquen Plaza I 1b. Development (project) number: NY005012430
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 approved , submitted, or planned for submission: July 30, 2021
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: 144 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Boston Road Plaza 1b. Development (project) number: NY005010390
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 approved , submitted, or planned for submission: July 30, 2021
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: 235 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Bronx River Addition 1b. Development (project) number: NY005010320
1. 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"/>
2. 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"/>
3. 4. Date this designation approved , submitted, or planned for submission: July 30, 2021
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: 226

7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Reverend Randolph Brown 1b. Development (project) number: NY005012520
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 approved , submitted, or planned for submission: July 30, 2021
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: 200 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Cassidy-Lafayette 1b. Development (project) number: NY005011170
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 approved , submitted, or planned for submission: July 30, 2021
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: 380 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Chelsea Addition 1b. Development (project) number: NY005011340
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"/>
4. 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 approved , submitted, or planned for submission: July 30, 2021
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: 96 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Claremont Parkway-Franklin Avenue 1b. Development (project) number: NY005013420
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 approved , submitted, or planned for submission: July 30, 2021
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: 116 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: College Avenue-East 165th Street 1b. Development (project) number: NY005013080
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 approved , submitted, or planned for submission: July 30, 2021
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: 95 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: College Point Rehab 1b. Development (project) number: NY005011860
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 approved , submitted, or planned for submission: July 30, 2021
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: 13 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: John Conlon LIHFE Towers 1b. Development (project) number: NY005010910
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 approved , submitted, or planned for submission: July 30, 2021
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: 216 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Edward Corsi

1b. Development (project) number: NY005010640
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 approved , submitted, or planned for submission: July 30, 2021
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: 171 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Davidson 1b. Development (project) number: NY005013420
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 approved , submitted, or planned for submission: July 30, 2021
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: 56 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: East 152nd Street-Courtlandt Avenue 1b. Development (project) number: NY005010280
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 approved , submitted, or planned for submission: July 30, 2021
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
Designation of Public Housing Activity Description
1a. Development name: Marcus Garvey (Group A)
1b. Development (project) number: NY005012520
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 approved , submitted, or planned for submission: July 30, 2021
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: 86
7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Glebe Avenue-Westchester Avenue
1b. Development (project) number: NY005010670
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 approved , submitted, or planned for submission: July 30, 2021
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: 132
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description

1a. Development name: Bernard Haber 1b. Development (project) number: NY005011660
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 approved , submitted, or planned for submission: July 30, 2021
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: 380 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Harborview Terrace 1b. Development (project) number: NY005010220
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 approved , submitted, or planned for submission: July 30, 2021
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: 195 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: International Tower 1b. Development (project) number: NY005010910
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 approved , submitted, or planned for submission: July 30, 2021
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: 159
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Kingsborough Extension
1b. Development (project) number: NY005010100
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 approved , submitted, or planned for submission: July 30, 2021
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: 184
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Mayor Fiorello H. LaGuardia Addition
1b. Development (project) number: NY005010760
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 approved , submitted, or planned for submission: July 30, 2021
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: 150

7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Leavitt Street-34th Avenue 1b. Development (project) number: NY005011860
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 approved , submitted, or planned for submission: July 30, 2021
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: 83
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Lower East Side I Infill 1b. Development (project) number: NY005011000
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 approved , submitted, or planned for submission: July 30, 2021
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: 72
7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Justice Thurgood Marshall Plaza 1b. Development (project) number: NY005010030
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 approved , submitted, or planned for submission: July 30, 2021
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: 180 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Judge Max Meltzer Tower 1b. Development (project) number: NY005011000
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 approved , submitted, or planned for submission: July 30, 2021
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: 231 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Middletown Plaza 1b. Development (project) number: NY005010340
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 approved , submitted, or planned for submission: July 30, 2021
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: 179 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Mayor John Purroy Mitchel 1b. Development (project) number: NY005011450
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 approved , submitted, or planned for submission: July 30, 2021
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: 165 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Morris Park Senior Citizens Home 1b. Development (project) number: NY005012410
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 approved , submitted, or planned for submission: July 30, 2021
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: 97 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Morrisania Air Rights

1b. Development (project) number: NY005012670
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 approved , submitted, or planned for submission: July 30, 2021
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: 300 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: New Lane Area 1b. Development (project) number: NY005010350
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 approved , submitted, or planned for submission: July 30, 2021
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: 277 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Randall Avenue – Balcom Avenue 1b. Development (project) number: NY005010630
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 approved , submitted, or planned for submission: July 30, 2021
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: 252 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: William Reid Apartments 1b. Development (project) number: NY005011670
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 approved , submitted, or planned for submission: July 30, 2021
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: 230 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Ira S. Robbins Plaza 1b. Development (project) number: NY005011390
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 approved , submitted, or planned for submission: July 30, 2021
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: 150 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Designation of Public Housing Activity Description
1a. Development name: Eleanor Roosevelt I 1b. Development (project) number: NY005011350
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 approved , submitted, or planned for submission: July 30, 2021
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: 159 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Shelton Houses 1b. Development (project) number: NY005010910
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 approved , submitted, or planned for submission: July 30, 2021
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: 155 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Sondra Thomas Apartments 1b. Development (project) number: NY005011270
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 approved , submitted, or planned for submission: July 30, 2021
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: 87 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Peter Stuyvesant Gardens II 1b. Development (project) number: NY005012210
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 approved , submitted, or planned for submission: July 30, 2021
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: 150 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Surfside Gardens 1b. Development (project) number: NY005011700
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 approved , submitted, or planned for submission: July 30, 2021
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: 270

7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Twin Parks East (Site 9) 1b. Development (project) number: NY005012270
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 approved , submitted, or planned for submission: July 30, 2021
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: 219 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Union Avenue-East 163rd Street 1b. Development (project) number: NY005013420
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 approved , submitted, or planned for submission: July 30, 2021
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: 200 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: UPACA (Site 5) 1b. Development (project) number: NY005012410
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 approved , submitted, or planned for submission: July 30, 2021
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: 200
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: UPACA (Site 6) 1b. Development (project) number: NY005012410
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 approved , submitted, or planned for submission: July 30, 2021
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?
9. Number of units affected: 150
9. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Van Dyke II 1b. Development (project) number: NY005011680
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 approved , submitted, or planned for submission: July 30, 2021
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: 112 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: Vandalia Avenue 1b. Development (project) number: NY005011940
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 approved , submitted, or planned for submission: July 30, 2021
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: 293 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: West Brighton II 1b. Development (project) number: NY005010130
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 approved , submitted, or planned for submission: July 30, 2021
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: 144 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
Designation of Public Housing Activity Description
1a. Development name: West Tremont Avenue-Sedgwick Avenue 1b. Development (project) number: NY005010450

<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 approved, submitted, or planned for submission: July 30, 2021</p>
<p>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?</p>
<p>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</p>
<p>Designation of Public Housing Activity Description</p>
<p>1a. Development name: Gaylord White 1b. Development (project) number: NY005010090</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 approved, submitted, or planned for submission: July 30, 2021</p>
<p>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?</p>
<p>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</p>
<p>Designation of Public Housing Activity Description</p>
<p>1a. Development name: Carter G. Woodson 1b. Development (project) number: NY005011680</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 approved , submitted, or planned for submission: July 30, 2021
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: 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 has 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?

- Electronic Funds Transfer – April 9, 1998
- Data Sharing – March 28, 2001
- Data Sharing – July 14, 2015
- Data Sharing – October 25, 2018
- Data Sharing – March 11, 2019
- Data Sharing – April 2, 2019
- Data Sharing – August 8, 2019
- Data Sharing – March 31, 2021
- Data Sharing – May 17, 2021

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 31% 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.)

Program Name	Units or Families Served at Year Beginning 2020	Expected Turnover
<p>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.</p>	<p>322 services provided to ROSS residents from reporting period of 01/01/20 to 08/22/20</p>	<p>N/A</p>
<p>ROSS Service Coordinator Grant 2019: To enhance self-sufficiency by accessing employment and other economic-related resources and opportunities to NYCHA residents through geographically-based service coordination. This grant began on 08/23/20.</p>	<p>156 services provided to ROSS residents from reporting period 08/23/20 to 12/31/20</p>	<p>N/A</p>
<p>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.</p>	<p>960 program enrollments as of 12/31/20</p>	<p>N/A</p>

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / office / another provider name)	Eligibility (public housing or section 8 participants or both)
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	1,948 attendees at an information session from reporting period 01/01/20 to 12/31/20	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 community centers	Public Housing Residents/ Section 8 Residents
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.	8,935 calls handled from reporting period 01/01/20 to 12/31/20	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	127,000 unique visitors from reporting period 01/01/20 to 12/31/20	Self-referred, unemployed and under-employed public housing & section 8 residents	Via REES' microsite: www.opportunity.nycha.org	Public Housing / Section 8 residents

programs through downloadable referral slips and RSVP for events.				
REES Job Placement				
Direct job placement facilitated by REES through the Section 3 mandate, the NYCHA REP policy, the NYCHA Resident Training Academy, and outside employers	874 direct job placements from reporting period 01/01/20 to 12/31/20	Self-referred unemployed and under-employed public housing residents	REES offices located at central office location in Downtown Brooklyn	Public Housing Residents
<p>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 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>	960* Projected Hires on contracts awarded from reporting period 01/01/20 to 12/31/20 <i>*Hiring projections include those made on upcoming NYCHA Real Estate Development projects. Contracts that do not trigger Section 3, but include other hiring contractual obligations, are also included.</i>	Public Housing and Section 3 Residents	REES offices at Downtown Brooklyn, Contractor and work locations throughout NYCHA	Public Housing & Section 3 residents

<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 and neighbor to neighbor support for work</p> <ul style="list-style-type: none"> • Jobs-Plus is administered by NYCHA, HRA, CEO and OFE • 1 of the 10 Jobs-Plus sites is funded through the HUD Jobs Plus Initiative Grant 	<p>378 verified placements from reporting period 01/01/20 to 12/31/20</p>	<p>Public Housing Residents</p>	<ul style="list-style-type: none"> • East Harlem – Urban Upbound • South Bronx Site I – Bronx Works • South Bronx Site II –East Side Settlement House • Western Queens – Urban Upbound • Lower East Side – Henry Street Settlement House • Central Brooklyn – Bedford Stuyvesant Restoration Corporation • Brownsville Brooklyn-Grant Associates • Northwest Bronx – Goodwill Industries • Staten Island – Arbor ResCare • East New York – Bedford Stuyvesant Restoration Corporation 	<p>Public Housing Residents</p> <p>Must be a public housing resident of target site location.</p>
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REES Connection to Services				
<p>Recruitment for Cohort Based Services and program enrollment: Services in the following categories are offered through REES partners in the five boroughs</p> <ul style="list-style-type: none"> • Vocational Training • Adult Education • Financial Education • Business Development 	<p>645 enrollments in classes and trainings as of reporting period 01/01/20 to 12/31/20</p>	<p>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</p>	<p>Services provided at partner locations</p>	<p>Public Housing Residents/ Section 8 residents</p>
<p>Referrals to Ongoing Services: Services in the following categories are offered through REES partners in the five boroughs</p> <ul style="list-style-type: none"> • Vocational Training • Adult Education • Financial Counseling • SNAP Access • Workforce Development • Business Planning 	<p>1,002 unique residents were referred to ongoing services from reporting period 01/01/20 to 12/31/20</p>	<p>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 resident's consent to participate in the service provision.</p>	<p>Services provided at partner locations</p>	<p>Public Housing / Section 8</p>
<p>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)</p>	<p>273 graduates in the NRTA program year as of reporting period 01/01/20 to</p>	<p>Public housing residents are recruited through multiple outreach channels and complete an initial pre-screen with REES staff.</p>	<p>City Technical College/ Brooklyn Workforce Innovations</p>	<p>Public Housing Residents</p>

	12/31/20	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

Program	Actual Number of Enrolled Participants (As of: 12/31/20)
Public Housing	0
Section 8	960

- 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 December 31, 2020, the program has 960 participants enrolled, of which 469 or 49% percent have escrow accounts averaging over \$6,146. In 2020 the program graduated 44 residents dispersing a total of \$505,969. NYCHA was awarded a 2020 Family Self Sufficiency grant for three (3) Coordinators.

Faced with the pandemic in Spring 2020, NYCHA FSS staff concentrated on serving existing clients, many of whom were experiencing job displacement, as well as a hiatus on their educational and job training programs. In October 2020, the program held its first virtual information session for new enrollees and continues to offer Section 8 voucher holders an opportunity to learn about and enroll in the program from the safety of their homes. Also in 2020, the FSS senior program coordinator as well as the Assistant Director, Financial Capability & Business Development completed the Nan McKay Self Sufficiency Service Coordination training workshop series.

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 Applications and Tenancy Administration Department 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, tenants 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 Animals are exempt from weight and breed restrictions.

3. Registration:

Every household that owns a dog, a cat, or an Assistance Animal **MUST** submit to NYCHA a registration form (available at the management office) within **30** days after such dog, cat, or an Assistance Animal was acquired. If a 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 Agreement*, if documentation cannot be provided. A dog, cat or Assistance Animal that is not registered is prohibited from living in a NYCHA apartment.

4. Dog Tag:

When in public or common areas, all dogs (including dogs that are Assistance Animals) must wear its NYCHA issued 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).*

5. Assistance Animals:

There are two types of Assistance Animals: (1) service animal, which is defined as any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability; and (2) other (trained or untrained) animals that do work, perform tasks, provide assistance, and/or provide therapeutic emotional support for individuals (e.g. support animals). A service animal may only be a dog. An example of a service animal is a guide dog for a visually impaired individual. Service animals must be registered.

Tenants seeking a reasonable accommodation for an Assistance Animal must complete NYCHA Form *040.505, Dog, and Cat, and Assistance Animal Registration Form*. Assistance Animals must be registered.

6. 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, cats or Assistance Animals.

7. 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. Tenants are not permitted to

keep dangerous dogs, including fighting dogs or attack dogs, on NYCHA property. This rule applies to Assistance Animals as well.

8. 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. These rules apply to Assistance Animals.

9. Pet Waste:

Pet owners must clean up after their pets, in their apartment and in public areas. Tenants must 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. These rules apply to Assistance Animals as well.

10. Dog Leash:

A dog must always be kept on a leash, six feet long or shorter, while in a public area both inside and outside of NYCHA buildings.

11. 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. Assistance Animals may enter pet-free zones, as necessary.

12. Spay/Neuter:

Dogs and cats must be spayed or neutered. This rule applies to Assistance Animals as well.

13. Vaccination:

Dogs and cats must have a current rabies vaccination. This rule applies to Assistance Animals as well.

14. 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 2019 has been completed and the final audit report was electronically submitted to the Federal Audit Clearinghouse as well as HUD REAC on December 30, 2020. The fiscal audit for year 2020 will be completed and submitted in advance of the March 31, 2022 deadline.

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

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 88 to 167 for information on NYCHA's activities related demolition and disposition, conversion of public housing, homeownership, project-based vouchers and RAD/PACT. Please see page 169 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 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
DEMOLITION AND/OR DISPOSITION, CONVERSION OF PUBLIC HOUSING, HOMEOWNERSHIP, PROJECT-BASED VOUCHERS AND RENTAL ASSISTANCE DEMONSTRATION (RAD)

A) Demolition and/or Disposition

Build to Preserve Housing Developments

Holmes Towers, Manhattan – NYCHA intends to lease a parcel of approximately 20,660 square feet on Block 1573, Lot 20 with approximately 330,368 square feet of development rights for market rate and affordable housing development. NYCHA in collaboration with HPD issued an RFP in Spring 2016 and a developer was designated in Spring 2017. A Section 18 Application was submitted in 2019 but was subsequently withdrawn. No engagement or activities are currently taking place.

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. NYCHA in collaboration with HPD issued an RFP in Spring 2016 and a developer was designated in late 2017. No engagement or activities are currently taking place.

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. NYCHA in collaboration with HPD issued an RFP in 2018. No engagement or activities are currently taking place.

New 100% Affordable Housing Developments

Astoria, Queens – Multi-phase project for the development of two affordable housing buildings, an additional building with a program to be determined, an option for the NYC School Construction Authority to acquire a parcel to build a new school, and facilitation of the reopening of Astoria Boulevard as a private street for public access through a street easement in conjunction with a mixed-use development on the waterfront at Halletts Point. The first building for affordable housing was sold and construction began in 2019. Additionally, the School Construction Authority has been given notice that the option to acquire a school site from NYCHA is active and will remain valid until December 31, 2022.

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 and closed in October 2020.

Betances VI, Bronx – NYCHA intends to lease a parcel of approximately 10,000 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 was submitted and approved in 2019. Demolition of the existing one-story commercial structure and construction of the new affordable housing development is scheduled to begin in 2021.

Morrisania Air Rights, Bronx – NYCHA leased a parcel of approximately 21,200 square feet on Block 2409, Lot 98, for construction of a 171-unit family housing development. NYCHA in collaboration with HPD issued an RFP in 2017. A developer was designated in 2018. A Section 18 Application was submitted and approved in 2020 and construction is underway.

Sumner, Brooklyn – NYCHA leased a parcel of approximately 24,200 square feet on Block 1580, Lot 1, for construction of a senior housing development with approximately 190 units. NYCHA in collaboration with HPD issued an RFP in 2017. A developer was designated in 2018 and a Section 18 Application was approved in 2021. Construction is scheduled to begin in 2021.

Twin Parks West, Bronx – NYCHA leased a parcel of approximately 16,500 square feet on Block 3143, Lots 234, 236 and 240, for construction of a 182-unit family housing development. NYCHA in collaboration with HPD issued an RFP in 2017. A developer was designated in 2018. A Section 18 Application was submitted and approved in 2020 and construction is underway.

Harborview Terrace, Manhattan – NYCHA intends to lease a parcel of approximately 29,000 square feet on Block 1084, Lot 9, for construction of a new housing development. NYCHA in collaboration with HPD issued an RFP in 2017.

Bushwick II CDA (Group E), Brooklyn – NYCHA intends to lease a parcel of approximately 12,300 square feet on Block 3325, Lot 1 for construction of a senior housing development. A developer was designated in 2019. Construction is scheduled to begin in 2022 contingent upon Section 18 approval.

Justice Sonya Sotomayor Houses, Bronx – NYCHA leased a parcel of approximately 13,000 square feet on Block 3730, Lot 1 for construction of a senior housing development with approximately 201 units. A developer was designated in 2019. Construction is scheduled to begin in 2021.

Dyckman Houses, Manhattan – NYCHA intends to lease a parcel of approximately 15,000 square feet on Block 2216, Lot 1 for construction of an affordable housing development with approximately 180-250 units.

Morris II Houses, Bronx – NYCHA intends to lease a parcel of approximately 13,000 square feet on Block 2902, Lot 36 for construction of a senior affordable housing development with approximately 150-200 units. NYCHA issued an RFP in collaboration with HPD in 2019.

Kingsborough Houses and Kingsborough Houses Extension, Brooklyn – NYCHA intends to lease a parcel of approximately 18,000 square feet on Block 1344, Lots 1 and 175 for construction of an affordable senior housing development with approximately 150-200 units. NYCHA issued an RFP in collaboration with HPD in 2019.

West Brighton II, Staten Island – NYCHA intends to lease a parcel on Block 196, Lot 1 for construction of a housing development. NYCHA intends to issue an RFP in collaboration with HPD in 2021.

East 173rd 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.

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 mixed-use building. The parcels are located on Beach Channel Drive between Beach 53rd and Beach 54th 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. Section 18 application submission dates, as well as construction start dates, have not yet been finalized.

Other Development Activities

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 Climate Resiliency (MOCR) 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 to Preserve

Robert Fulton, Manhattan – NYCHA intends to dispose of approximately 30,000 square feet of surplus development rights for commercial office development on 10th Avenue through a zoning lot merger. The proposed transfer of development rights (“TDR”) will generate revenue for NYCHA. NYCHA intends to submit a Section 18 application upon receipt of zoning lot merger consent from the intervening owners.

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 a new residential housing development and generate funding to make repairs at the College Avenue-East 165th Street development.

Howard Houses, Brooklyn – NYCHA intends to dispose of a parcel of land of approximately 4,560 square feet, and approximately 23,360 square feet of additional surplus development rights through a zoning lot merger. The proposed land sale and TDR will facilitate an affordable housing development and generate revenue for NYCHA.

Manhattanville, Manhattan – NYCHA recently received a proposal to dispose of two small parcels of land and surplus development rights through a zoning lot merger. The proposed transaction would generate funding to make repairs at the Manhattanville development. NYCHA intends to engage with residents at the Manhattanville development to discuss this project further.

Campos Plaza II, Manhattan – NYCHA intends to potentially dispose of up to approximately 100,000 square feet of surplus development rights through a zoning lot merger. The proposed transaction will generate funding to make repairs at the Campos Plaza II development.

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.)

Demolition/Disposition Activity Description
1a. Development name: FHA Repossessed Houses – Group V [Formerly Groups I, II, III, V, VI, VII, IX, and X]
1b. Development (project) number: NY005012090
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>NYCHA intends to dispose of twenty (20) units in twelve (12) vacant properties comprised of one (1) four-family home, five (5) two-family homes and six (6) one-family homes located in Queens and Brooklyn. Due to their scattered locations 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"> • <i>305 Atkins Avenue, Brooklyn, NY 11208, Total Units = 4 (1 One-Bedroom Unit, 3 Two-Bedroom Units)</i> • <i>113-44 Springfield Boulevard, Queens Village, NY 11429, Total Units = 2 (1 One Bedroom, 1 Two Bedroom Units)</i> • <i>144-29 105th Avenue, Jamaica, NY 11435, Total Units = 2 (2 Three-Bedroom Units)</i> • <i>69-33 Bayfield Avenue, Arverne, NY 11692, Total Units = 2 (1 One-Bedroom Unit, 1 Three-Bedroom Unit)</i> • <i>349 Berriman Street, Brooklyn, NY 11208, Total Units = 2 (1 Two-Bedroom Unit and 1 Three-Bedroom Unit)</i> • <i>140 East 91st Street, Brooklyn, NY 11212, Total Units = 2 (1 One-Bedroom Unit and 1 Two-Bedroom Unit)</i> • <i>144-23 166th Street, Springfield Gardens, NY 11434, Total Units = 1 (Three-Bedroom Unit)</i> • <i>143-03 105th Avenue, Jamaica, NY 11435, Total Units = 1 (Three-Bedroom Unit)</i>

- 114-22 166th Street, Jamaica, NY 11434, Total Units = 1 (Three-Bedroom Unit)
- 231 Fernside Place, Far Rockaway, NY 11691, Total Units = 1 (Three-Bedroom Unit)
- 119-12 219th Street, Jamaica, NY 11411, Total Units = 1 (Three-Bedroom Unit)
- 146-23 176th Street, Jamaica, NY 11434, Total Units = 1 (Three-Bedroom Unit)

3. Application status (select one)

- Approved
- Submitted, pending approval
- Planned application

4. Date application **approved**, submitted, or planned for submission: **Fall 2020**

5. Number of units affected: 6

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. **Actual** end date of activity: **April 2021**

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 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 locations 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.*

- 99 Waverly Avenue, Brooklyn, NY 11205, Total Units = 3 (All One-Bedroom Units)
- 110 Waverly Avenue, Brooklyn, NY 11205, Total Units = 4 (All Two-Bedroom Units)

3. Application status (select one)

- Approved
- Submitted, pending approval
- Planned application

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

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. **Actual** end date of activity: **April 2021**

Demolition/Disposition Activity Description

1a. Development name: **FHA Repossessed Houses – Group V [Formerly Group X]**

1b. Development (project) number: **NY005012090**

2. Activity type: Demolition

Disposition NYCHA intends to dispose of one (1) one-bedroom unit in one (1) vacant home in Queens. Due to its scattered location and wood frame construction, this property is costly to operate as public housing and represents an inefficient allocation of housing resources within the Authority.

- 118-35 153rd Street, Jamaica, NY 11434, Total Units = 1 (One-Bedroom Unit)

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

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

7. Timeline for activity:
 a. **Actual** or projected start date of activity: **Spring 2017**
 b. **Actual** end date of activity: **April 2021**

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 thirteen (13) vacant single-family FHA Repossessed Houses. Due to their scattered locations and wood frame construction, these properties are costly to operate as public housing and represent an inefficient allocation of housing resources within the Authority.

Building #	Development	Address	City	Zip Code	DU Size
1	FHA (GROUP VIII)	106-10 215 TH STREET	QUEENS VILLAGE	11429	3 BR
2	FHA (GROUP V)	142-06 FOCH BOULEVARD	SOUTH OZONE PARK	11436	2 BR
3	FHA (GROUP I)	100-40 202 ND STREET	HOLLIS	11423	2 BR
4	FHA (GROUP VII)	111-50 WITTHOFF STREET	QUEENS VILLAGE	11429	3 BR
5	FHA (GROUP I)	114-11 130 th STREET	SOUTH OZONE PARK	11420	3 BR
6	FHA (GROUP VII)	117-11 143 RD STREET	JAMAICA	11434	2BR
7	FHA (GROUP II)	126-01 116 TH AVENUE	SOUTH OZONE PARK	11420	2 BR
8	FHA (GROUP V)	133-24 135 TH PLACE	SOUTH OZONE PARK	11420	2 BR
9	FHA (GROUP I)	202-06 116 TH AVENUE	SAINT ALBANS	11412	3 BR
10	FHA (GROUP X)	214-15 HOLLIS AVENUE	QUEENS VILLAGE	11429	4 BR
11	FHA (GROUP VIII)	198-16 116 TH AVENUE	JAMAICA	11412	3 BR
12	FHA (GROUP IV)	209-26 NASHVILLE BOULEVARD	JAMAICA	11411	3 BR
13	FHA (GROUP IV)	99-19 194 TH 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 2020**

5. Number of units affected: 13

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: **Fall 2021**

Demolition/Disposition Activity Description
1a. Development name: Soundview Houses 1b. Development (project) number: NY005000710
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>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.</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 approved , submitted, or planned for submission: January 30, 2013
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: 2012 b. Actual end date of activity: 2020
Demolition/Disposition Activity Description
1a. Development name: East 173rd Street-Vyse Avenue Houses 1b. Development (project) number: NY005015300
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 approved , submitted, or planned for submission: November 14, 2009
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: November 21, 2008 b. Projected end date of activity: TBD
Demolition/Disposition Activity Description
1a. Development name: Astoria Houses 1b. Development (project) number: NY005000260
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Multi-phase project for the development of two affordable housing buildings, an additional building with a program to be determined, an option for the NYC School Construction Authority to acquire a parcel to build a new school, and facilitation of 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 first building for affordable housing was</i>

sold and construction began in 2019. Additionally, the School Construction Authority has been given notice that the option to acquire a school site from NYCHA is active and will remain valid to December 31, 2022.

3. Application status (select one)

- Approved
Submitted, pending approval
Planned application

4. Date application **approved**, submitted, or planned for submission: **August 28, 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: **Fall 2016**

b. **Projected** end date of activity: **Fall 2026**

Demolition/Disposition Activity Description

1a. Development name: **Holmes Towers**

1b. Development (project) number: **NY005011390**

2. Activity type: Demolition

Disposition *Lease of an approximate 20,660 square foot parcel on Block 1573, Lot 20 with approximately 330,368 square feet of development rights for market rate and affordable housing development.*

3. Application status (select one)

- Approved
Submitted, pending approval
Planned application

4. Date original application approved, submitted, or **planned for submission**: **TBD**

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: **2016**

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

Demolition/Disposition Activity Description

1a. Development name: **Wyckoff Gardens**

1b. Development (project) number: **NY005011630**

2. Activity type: Demolition

Disposition *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.*

3. Application status (select one)

- Approved
Submitted, pending approval
Planned application

4. Date original application approved, submitted, or **planned for submission**: **TBD**

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: 2016 b. Projected end date of activity: TBD
Demolition/Disposition Activity Description
1a. Development name: La Guardia Houses 1b. Development (project) number: NY005010760
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.</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 planned for submission: TBD
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: 2017 b. Projected end date of activity: TBD
Demolition/Disposition Activity Description
1a. Development name: Betances VI 1b. Development (project) number: NY005012110
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" 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 checked="" type="checkbox"/> Planned application <input type="checkbox"/>
4. Date original application approved , submitted, or planned for submission: 2019
5. Number of units affected: 0 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: 2016 b. Projected end date of activity: 2021
Demolition/Disposition Activity Description
1a. Development name: Morrisania Air Rights

1b. Development (project) number: NY005012670
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 planned for submission: 2020
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: 2017 b. Actual end date of activity: 2020
Demolition/Disposition Activity Description
1a. Development name: Sumner Houses 1b. Development (project) number: NY005010730
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 approximately 190 units of affordable senior housing with Project-Based Section 8 vouchers.</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, submitted , or planned for submission: 2020
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: 2017 b. Actual end date of activity: June 2021
Demolition/Disposition Activity Description
1a. Development name: Twin Parks West (Sites 1 & 2) 1b. Development (project) number: NY005012270
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 182 affordable housing units with ground floor commercial space.</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, submitted , or planned for submission: 2020
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: 2017 b. Actual end date of activity: 2020
Demolition/Disposition Activity Description
1a. Development name: Harborview Terrace Houses 1b. Development (project) number: NY005010220
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 planned for submission : TBD
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: 2017 b. Projected end date of activity: TBD
Demolition/Disposition Activity Description
1a. Development name: Bushwick II CDA (Group E) 1b. Development (project) number: NY005012470
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of a parcel of approximately 12,300 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 planned for submission : 2021
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: 2017 b. Projected end date of activity: 2022
Demolition/Disposition Activity Description
1a. Development name: Sotomayor Houses 1b. Development (project) number: NY005010670
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of a parcel of approximately 13,000 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 planned for submission : 2020																																
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: 2017 b. Actual end date of activity: June 2021																																
Demolition/Disposition Activity Description																																
1a. Development name: Ocean Bay Apartments (Oceanside) 1b. Development (project) number: NY005010980																																
2. Activity type: Demolition <input 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 a mixed-use building. 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> <table border="1"> <thead> <tr> <th><u>Borough</u></th> <th><u>Block</u></th> <th><u>Lot</u></th> <th><u>Address</u></th> </tr> </thead> <tbody> <tr> <td>Queens</td> <td>15890</td> <td>54</td> <td>360 Beach 54th Street (parcel contains a one-story retail space)</td> </tr> <tr> <td>Queens</td> <td>15890</td> <td>55</td> <td>366 Beach 54th Street (parcel contains a one-story retail space)</td> </tr> <tr> <td>Queens</td> <td>15890</td> <td>58</td> <td>53-15 Beach Channel Drive (vacant lot)</td> </tr> <tr> <td>Queens</td> <td>15890</td> <td>62</td> <td>53-13 Beach Channel Drive (vacant lot)</td> </tr> <tr> <td>Queens</td> <td>15890</td> <td>64</td> <td>53-05 Beach Channel Drive (parcel contains a one-story retail space)</td> </tr> <tr> <td>Queens</td> <td>15890</td> <td>66</td> <td>53-01 Beach Channel Drive (parcel contains a one-story retail space)</td> </tr> <tr> <td>Queens</td> <td>15890</td> <td>69</td> <td>N/A Beach 53rd Street (vacant lot)</td> </tr> </tbody> </table>	<u>Borough</u>	<u>Block</u>	<u>Lot</u>	<u>Address</u>	Queens	15890	54	360 Beach 54th Street (parcel contains a one-story retail space)	Queens	15890	55	366 Beach 54th Street (parcel contains a one-story retail space)	Queens	15890	58	53-15 Beach Channel Drive (vacant lot)	Queens	15890	62	53-13 Beach Channel Drive (vacant lot)	Queens	15890	64	53-05 Beach Channel Drive (parcel contains a one-story retail space)	Queens	15890	66	53-01 Beach Channel Drive (parcel contains a one-story retail space)	Queens	15890	69	N/A Beach 53rd Street (vacant lot)
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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: 2003 b. Projected end date of activity: TBD																																
Demolition/Disposition Activity Description																																
1a. Development name: Dyckman Houses 1b. Development (project) number: NY005000410																																

<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 2216 Lot 1 with development rights for affordable housing development.</i></p>
<p>3. Application status (select one)</p> <p>Approved <input type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input checked="" type="checkbox"/></p>
<p>4. Date original application approved, submitted, or planned for submission: TBD</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. Actual or projected start date of activity: TBD</p> <p>b. Projected end date of activity: TBD</p>
<p>Demolition/Disposition Activity Description</p>
<p>1a. Development name: Morris II Houses</p> <p>1b. Development (project) number: NY005011020</p>
<p>2. Activity type: Demolition <input type="checkbox"/></p> <p>Disposition <input checked="" type="checkbox"/> <i>Lease of an approximate 13,000 square foot parcel on Block 2902 Lot 36 with development rights for affordable housing development.</i></p>
<p>3. Application status (select one)</p> <p>Approved <input type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input checked="" type="checkbox"/></p>
<p>4. Date original application approved, submitted, or planned for submission: TBD</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. Actual or projected start date of activity: 2019</p> <p>b. Projected end date of activity: TBD</p>
<p>Demolition/Disposition Activity Description</p>
<p>1a. Development name: Kingsborough Houses and Kingsborough Houses Extension</p> <p>1b. Development (project) number: NY005010100</p>
<p>2. Activity type: Demolition <input type="checkbox"/></p> <p>Disposition <input checked="" type="checkbox"/> <i>Lease of an approximate 18,000 square foot parcel on Block 1344 Lots 1 and 175 with development rights for affordable housing development.</i></p>
<p>3. Application status (select one)</p> <p>Approved <input type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input checked="" type="checkbox"/></p>
<p>4. Date original application approved, submitted, or planned for submission: TBD</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>

7. Timeline for activity: a. Actual or projected start date of activity: 2019 b. Projected end date of activity: TBD
Demolition/Disposition Activity Description
1a. Development name: West Brighton II 1b. Development (project) number: NY005010130
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Lease of a parcel on Block 196 Lot 1 with development rights for affordable housing 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 original application approved, submitted, or planned for submission: TBD
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: TBD b. Projected end date of activity: TBD
Demolition/Disposition Activity Description
1a. Development name: Manhattanville 1b. Development (project) number: NY005020810
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Transfer of surplus development rights and two small parcels of land to an adjacent development site for residential 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 planned for submission: TBD
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: 2020 b. Projected end date of activity: 2021
Demolition/Disposition Activity Description
1a. Development name: Robert Fulton Houses 1b. Development (project) number: NY005001360
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 planned for submission: TBD
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: 2020 b. Projected end date of activity: TBD
Demolition/Disposition Activity Description
1a. Development name: College Avenue–East 165 Street 1b. Development (project) number: NY005013080
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 a new residential building.</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 planned for submission: TBD
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: 2020 b. Projected end date of activity: 2021
Demolition/Disposition Activity Description
1a. Development name: Howard Houses 1b. Development (project) number: NY005000720
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Transfer of surplus development rights and potentially a small piece of land to an adjacent site for affordable housing 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 planned for submission: 2021
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: 2019 b. Projected end date of activity: 2021
Demolition/Disposition Activity Description
1a. Development name: Campos Plaza II 1b. Development (project) number: NY005012570
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/> <i>Transfer of surplus development rights to an adjacent development site for mixed use 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 planned for submission: TBD
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: 2020 b. Projected end date of activity: 2021
Demolition/Disposition Activity Description
1a. Development name: Boston Secor 1b. Development (project) number: NY005011380
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 possible building replacement by SCA in the future. The Boston Secor Annex Site is expected to be acquired by the School Construction Authority by 2022.</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 approved , submitted, or planned for submission: May 12, 2011
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: July 2010 b. Projected end date of activity: 2022

B) 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 July 31, 2021, there are 3,650 Section 8 conversions in the remaining City and State-built developments (see table below) in NYCHA's portfolio. 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 7/31/21
NY005021870	AMSTERDAM ADDITION	175	26	26
NY005020920	BAY VIEW	1,610	340	340
NY005020460	BOULEVARD	1,441	1,424	462
NY005020860	BUSHWICK	1,220	209	209
NY005020800	CASTLE HILL	2,025	412	406
NY005021340	CHELSEA	425	68	68
NY005021110	DREW HAMILTON	1,217	276	278
NY005020950	LINDEN	1,586	1,586	496
NY005020810	MANHATTANVILLE	1,272	204	204
NY005020490	MARBLE HILL	1,682	258	257
NY005020830	MARLBORO	1,765	372	357
NY005020990	RUTGERS	721	102	102
NY005020930	SAINT MARY'S PARK	1,007	211	209
NY005023770	SAMUEL (CITY)	664	105	105
NY005021140	STAPLETON	693	140	131
	Total	17,503	5,733	3,650

3. PACT for Unfunded Units

In July 2017, NYCHA announced that it was expanding PACT to protect the Authority's unfunded units portfolio. This portfolio consisted of eight (8) mixed-finance public housing developments known as the "LLC II developments," which are ineligible to be included in the federal public housing operating fund and capital fund program subsidy formulas. Previously, NYCHA's PACT initiative was synonymous with RAD. To make significant repairs, more effectively manage the developments, and strategically deploy NYCHA's limited financial resources, NYCHA expanded PACT to create additional public-private partnerships and actively bring the unfunded units into the Authority's Housing Choice Voucher (Section 8) project-based 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 has cost NYCHA upwards of \$23 million per year in operating funds. Additionally, per the 2017 Physical Needs Assessment, 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 project-based funding. 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.

Converting all of the units to Section 8 funding will bring new, stable revenue to these LLC II 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.

On December 3, 2017, HUD approved NYCHA for a retention action pursuant to 2 CFR Part 200 for one non-dwelling building and 13 buildings with 722 apartments at Baychester Houses and Murphy Houses in the Bronx. 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. On December 28, 2018, NYCHA closed on this PACT/Unfunded Units conversion by entering into a public-private partnership with MBD Community Housing Corporation (developer and social services provider), Camber Property Group (developer), and L&M Development Partners (developer and property manager). Social services are also being provided by BronxWorks. The project was financed with conventional debt with a permanent takeout loan by the New York City Housing Development Corporation. Repairs were completed in 2021 and repair costs for the project totaled more than \$116 million.

As part of an Amendment to the FY 2018 Annual Plan, NYCHA requested HUD approval for a retention action pursuant to 2 CFR Part 200 for Independence Towers and Williams Plaza in Brooklyn. NYCHA began community engagement and resident conversion activities at these developments in March 2018. HUD approved NYCHA's Significant Amendment to the FY 2018 Annual Plan for the retention action at Independence Towers and Williams Plaza on September 14, 2018. In the second quarter of 2019, NYCHA selected a development to complete this project

consisting of The Arker Companies, Omni New York LLC, Dabar Development Partners and Bedford Stuyvesant Restoration Corporation. The project closed in February 2020.

NYCHA submitted an Amendment to the FY 2019 Annual Plan on March 21, 2019 to request HUD approval for a retention action pursuant to 2 CFR Part 200 for the remaining four developments in the LLC II portfolio, namely 344 East 28th Street, Wise Towers, Linden, and Boulevard. Through this action, all units in the developments will be operated outside of the federal public housing program under project-based Section 8. 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.

HUD approved NYCHA’s Significant Amendment to the FY 2019 Annual Plan for the retention action for these developments on June 19, 2019. NYCHA selected a development team comprised of The Community Preservation Corporation (CPC), the Community Development Trust (CDT), Monadnock Development, Kalel Holdings, Lemor Development Group, Community League of the Heights (CLOTH) and Cornell Pace Inc. (CPI) to finance, rehabilitate, and manage the Manhattan developments of 344 East 28th Street and Wise Towers, and converted the properties in November 2020. NYCHA also selected development teams in February 2020 for the remaining Brooklyn developments at Linden and Boulevard and anticipates completing conversion of the entire portfolio of unfunded units by the end of 2021.

The remaining LLC II developments are listed below:

AMP Number	Development Name	Total Units	Number of Units to be Converted to Section 8	Number of Units Converted by 7/31/21
NY005020460	BOULEVARD	1,441	1,424	462
NY005020950	LINDEN	1,586	1,586	496
Total		3,027	3,010	958

C) 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.)

Public Housing Homeownership Activity Description (Complete one for each development affected)	
1a. Development name: FHA Repossessed Houses Group V [formerly Groups I through X]	
1b. Development (project) number: NY005012090	
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 approved , submitted, or planned for submission: 9/11/2014	
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. Currently, 11 homes remain to be sold under the Plan.</i>	

D) 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 January 1, 2021, NYCHA has executed 162 HAP contracts for 14,013 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 RAD conversions.
2. In 2021, NYCHA expects to utilize no more than 5% of the Consolidated Annual Contributions Contract (ACC) for Project Based contracts.¹
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 2022 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.

¹ This figure excludes units that are exempt from the PBV program cap as a result of being converted to PBV assistance under Rental Assistance Demonstration, Section 18 Disposition, or other public housing preservation programs.

E) 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 federal subsidy stream for such developments from Section 9 to Section 8. On June 19, 2019, HUD approved NYCHA’s Significant Amendment to the FY 2019 Annual Plan which included a request to use the Section 18 disposition process for some or all units within the developments currently approved or being considered for RAD conversion, in order to improve the financial stability of the conversions.

Through NYCHA’s Permanent Affordability Commitment Together (“PACT”) initiative, NYCHA uses RAD and Section 18 programs to unlock funding to complete comprehensive repairs, while also ensuring homes remain permanently affordable and residents have the same basic rights as they possess in the public housing program. Residents continue to pay no more than 30% of adjusted gross income towards rent and developments remain under public control.

Extensive capital improvements are complete or under construction at all the sites that have converted under PACT, including upgrades to roofs, elevators, boilers, security systems, and grounds, as well as apartment interiors.

PACT/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 project-based Section 8 funding. NYCHA entered into a public-private partnership with MDG Construction + Design (developer and general contractor), The Wavecrest Management Team (property management company), Catholic Charities of Brooklyn and Queens (social services provider), and Ocean Bay Community Development Corporation (resident outreach and engagement team). The project was financed with Superstorm Sandy recovery funds from 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 was \$560 million, including the FEMA-funded resiliency work. Funds were 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 occurred with tenants-in-place; no residents are being relocated or displaced as a result of the conversion. RAD repairs were completed in 2018 and the remaining FEMA work concluded in 2019.

PACT/RAD at Betances

This conversion provided \$145 million for comprehensive repairs to 1,088 apartments across 40 buildings in the Mott Haven neighborhood of the Bronx. NYCHA entered into a public-private partnership with MDG Design + Construction (developer), The Wavecrest Management Team (property manager), and Catholic Charities Community Services, Archdiocese of New York (social services provider). The project was financed with conventional debt and developer equity. Repairs were substantially completed at the end of 2020.

PACT/RAD at Twin Parks West

This conversion is providing \$46 million for comprehensive repairs to 312 apartments in the Fordham Heights neighborhood of the Bronx. NYCHA entered into a public-private partnership with Gilbane Development Company (developer), Dantes Partners (developer), Apex Building Group (general contractor), and Kraus Management, Inc. (property manager). Social services are being provided by BronxWorks. The project is being financed with conventional debt. Phase I repairs are now complete and Phase II repairs will be completed in 2022.

PACT/RAD at Highbridge-Franklin

This conversion is providing \$38 million for comprehensive repairs to 336 apartments across 14 buildings in the Highbridge and Claremont neighborhoods of the Bronx. NYCHA entered into a public-private partnership with Gilbane Development Company (developer), Dantes Partners (developer), Apex Building Group (general contractor), and The Kraus Organization (property manager). Social services are being provided by BronxWorks. The project is being financed with conventional debt and a subsidy loan from the New York City Department of Housing Preservation and Development. Phase I repairs are now complete and Phase II repairs will be completed in 2023.

PACT/RAD at Hope Gardens

This conversion will provide \$280 million for comprehensive repairs to 1,321 apartments across 60 buildings in the Bushwick neighborhood of Brooklyn. NYCHA entered into a public-private partnership with Pennrose Properties (developer), Procida Construction (general contractor), Pinnacle City Living (property manager), and Acacia Network (social services provider). Repairs are expected to be completed by late 2021.

PACT/RAD at Brooklyn Sites

This conversion will provide \$434 million for comprehensive repairs to 2,625 apartments across 38 buildings in Brooklyn. NYCHA entered into a public-private partnership with the Arker Companies, Omni NY LLC, Dabar Development Partners, and Bedford Stuyvesant Restoration Corporation (developer joint venture), Chateau GC and Renewal Construction Services LLC (general contractor), Progressive Management (property manager), and El Puente, Nan Newark Tech World, Parcure Community Health Network (social services provider). Repairs began in 2020 and are expected to be completed in 2022.

PACT/RAD at Manhattan Sites

This conversion will provide \$383 million for comprehensive repairs to 1,718 units across 16 developments in Manhattan. The development team is a joint venture between Monadnock Development LLC, Community Preservation Corporation, Community Development Trust, Kalel Holdings, Lemor Development Group, and Community League of the Heights (CLOTH). Repairs began in 2020 and will be completed in late 2022 or 2023.

2. Developments Under Consideration by HUD for Future Section 8 Conversions

Below, please find specific information related to the Public Housing Developments that are under consideration by HUD for future RAD conversions, which may involve some or all units converting to Section 8 via Section 18.

Name of Public Housing Development: CLAREMONT REHAB (GROUP 2)	PIC Development ID: NY005013080	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 107	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521/168,100 x 107 = \$382,724
Bedroom Type	Number of Units Pre-Conversion 107	Number of Units Post-Conversion 107	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
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		
Name of Public Housing Development: CLAREMONT REHAB (GROUP 3)	PIC Development ID: NY005013080	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 115	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521/168,100 x 115 = \$411,339

Bedroom Type	Number of Units Pre-Conversion 115	Number of Units Post-Conversion 115	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
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		
Name of Public Housing Development: CLAREMONT REHAB (GROUP 4)	PIC Development ID: NY005013080	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 150	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521/168,100 x 150 = \$536,529
Bedroom Type	Number of Units Pre-Conversion 150	Number of Units Post-Conversion 150	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
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		
Name of Public Housing Development: CLAREMONT REHAB	PIC Development ID: NY005013080	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location

(GROUP 5)			if known, and # of units transferring) No
Total Units: 135	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521/168,100 x 135 = \$482,876
Bedroom Type	Number of Units Pre-Conversion 135	Number of Units Post-Conversion 135	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
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		
Name of Public Housing Development: HARRISON AVENUE REHAB (GROUP A)	PIC Development ID: NY005013410	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 34	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521/168,100 x 34 = \$121,613
Bedroom Type	Number of Units Pre-Conversion 34	Number of Units Post-Conversion 34	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations,

			etc.)
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		
Name of Public Housing Development: HARRISON AVENUE REHAB (GROUP B)	PIC Development ID: NY005013410	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 150	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521/168,100 x 150 = \$536,529
Bedroom Type	Number of Units Pre-Conversion 150	Number of Units Post-Conversion 150	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
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		
Name of Public Housing Development: MANHATTANVILLE REHAB (GROUP 3)	PIC Development ID: NY005010810	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No

Total Units: 51	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521/168,100 x 51 = \$182,420
Bedroom Type	Number of Units Pre-Conversion 51	Number of Units Post-Conversion 51	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	18	18	0
Two Bedroom	25	25	0
Three Bedroom	7	7	0
Four Bedroom	1	1	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: REHAB PROGRAM (WISE REHAB)	PIC Development ID: NY005011270	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 40	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521/168,100 x 40 = \$143,074
Bedroom Type	Number of Units Pre-Conversion 40	Number of Units Post-Conversion 40	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	21	21	0

Two Bedroom	19	19	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		
Name of Public Housing Development: SOUTH BRONX AREA (SITE 402)	PIC Development ID: NY005013420	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 114	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521 /168,100 x 114 = \$407,762
Bedroom Type	Number of Units Pre-Conversion 114	Number of Units Post-Conversion 114	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	0	0	0
Two Bedroom	36	36	0
Three Bedroom	66	66	0
Four Bedroom	12	12	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: STEBBINS AVENUE-HEWITT PLACE	PIC Development ID: NY005013420	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 120	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521 /168,100 x 120 = \$429,223
Bedroom Type	Number of Units Pre-Conversion 120	Number of Units Post-Conversion 120	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	30	30	0
Two Bedroom	60	60	0
Three Bedroom	30	30	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		
Name of Public Housing Development: UNION AVENUE-EAST 166TH STREET	PIC Development ID: NY005013420	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 120	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521/168,100 x 120 = \$429,233
Bedroom Type	Number of Units Pre-Conversion 120	Number of Units Post-Conversion 120	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	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		

Assistance):			
Name of Public Housing Development: WEST FARMS SQUARE CONVENTIONAL	PIC Development ID: NY005015310	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 20	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521/168,100 x 20 = \$71,537
Bedroom Type	Number of Units Pre-Conversion 20	Number of Units Post-Conversion 20	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
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	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: WSUR (BROWNSTONES)	PIC Development ID: NY005011270	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 236	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	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) \$601,270,521/168,100 x 236 = \$844,139

Bedroom Type	Number of Units Pre-Conversion 236	Number of Units Post-Conversion 236	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
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		
Name of Public Housing Development: HOE AVENUE-EAST 173RD STREET	PIC Development ID: NY005015300	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 65	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 65 = \$232,496
Bedroom Type	Number of Units Pre-Conversion 65	Number of Units Post-Conversion 65	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	5	5	0
One Bedroom	24	24	0
Two Bedroom	24	24	0
Three Bedroom	12	12	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: BRYANT AVENUE-EAST 174TH	PIC Development ID: NY005015300	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location

STREET			if known, and # of units transferring) No
Total Units: 72	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 72 = \$257,534
Bedroom Type	Number of Units Pre-Conversion 72	Number of Units Post-Conversion 72	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	14	14	0
One Bedroom	24	24	0
Two Bedroom	22	22	0
Three Bedroom	12	12	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: EAST 173RD STREET-VYSE AVENUE	PIC Development ID: NY005015300	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 168	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521 /168,100 x 168 = \$600,913
Bedroom Type	Number of Units Pre-Conversion 168	Number of Units Post-Conversion 168	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations,

			etc.)
Studio/Efficiency	0	0	0
One Bedroom	42	42	0
Two Bedroom	82	82	0
Three Bedroom	44	44	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: 1010 EAST 178 TH STREET	PIC Development ID: NY005011330	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 220	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 220 = \$786,910
Bedroom Type	Number of Units Pre-Conversion 220	Number of Units Post-Conversion 220	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	20	20	0
One Bedroom	76	76	0
Two Bedroom	40	40	0
Three Bedroom	6	6	0
Four Bedroom	2	2	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: EAST 165 TH STREET-BRYANT AVENUE	PIC Development ID: NY005015300	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No

Total Units: 111	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 111 = \$397,032
Bedroom Type	Number of Units Pre-Conversion 111	Number of Units Post-Conversion 111	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	0	0	0
Two Bedroom	34	34	0
Three Bedroom	65	65	0
Four Bedroom	12	12	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: HUNTS POINT AVENUE REHAB	PIC Development ID: NY005015300	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 131	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 131 = \$468,569
Bedroom Type	Number of Units Pre-Conversion 131	Number of Units Post-Conversion 131	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	20	20	0

Two Bedroom	75	75	0
Three Bedroom	36	36	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: LONGFELLOW AVENUE REHAB	PIC Development ID: NY005015300	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 75	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 75 = \$268,265
Bedroom Type	Number of Units Pre-Conversion 75	Number of Units Post-Conversion 75	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	0	0	0
Two Bedroom	0	0	0
Three Bedroom	75	75	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: WEST FARMS ROAD REHAB	PIC Development ID: NY005015300	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 208	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 208 = \$743,987
Bedroom Type	Number of Units Pre-Conversion 208	Number of Units Post-Conversion 208	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	92	92	0
Two Bedroom	81	81	0
Three Bedroom	31	31	0
Four Bedroom	4	4	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: 1471 WATSON AVENUE	PIC Development ID: NY005010670	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 96	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 96 = \$343,379
Bedroom Type	Number of Units Pre-Conversion 96	Number of Units Post-Conversion 96	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	12	12	0
One Bedroom	38	38	0
Two Bedroom	30	30	0
Three Bedroom	16	16	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Assistance):			
Name of Public Housing Development: BOYNTON AVENUE REHAB	PIC Development ID: NY005010320	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 82	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 82 = \$293,303
Bedroom Type	Number of Units Pre-Conversion 82	Number of Units Post-Conversion 82	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	25	25	0
Two Bedroom	37	37	0
Three Bedroom	17	17	0
Four Bedroom	3	3	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: WILLIAMSBURG	PIC Development ID: NY005000020	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 1,630	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 1,630 = \$5,830,285

Bedroom Type	Number of Units Pre-Conversion: 1,630	Number of Units Post-Conversion: 1,630	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	45	45	0
One Bedroom	775	775	0
Two Bedroom	741	741	0
Three Bedroom	69	69	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: HARLEM RIVER	PIC Development ID: NY005010030	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 577	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 577 = \$2,063,849
Bedroom Type	Number of Units Pre-Conversion: 577	Number of Units Post-Conversion: 577	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	59	59	0
One Bedroom	257	257	0
Two Bedroom	236	236	0
Three Bedroom	25	25	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: HARLEM RIVER II	PIC Development ID: NY005010030	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location

			if known, and # of units transferring) No
Total Units: 116	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 116 = \$414,916
Bedroom Type	Number of Units Pre-Conversion: 116	Number of Units Post-Conversion: 116	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	42	42	0
Two Bedroom	42	42	0
Three Bedroom	29	29	0
Four Bedroom	3	3	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: AUDUBON	PIC Development ID: NY005010030	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 168	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 168 = \$600,913
Bedroom Type	Number of Units Pre-Conversion: 168	Number of Units Post-Conversion: 168	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations,

			etc.)
Studio/Efficiency	5	5	0
One Bedroom	46	46	0
Two Bedroom	22	22	0
Three Bedroom	63	63	0
Four Bedroom	26	26	0
Five Bedroom	6	6	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: BETHUNE GARDENS	PIC Development ID: NY005010030	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 210	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior	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) \$601,270,521/168,100 x 210 = \$751,141
Bedroom Type	Number of Units Pre-Conversion: 210	Number of Units Post-Conversion: 210	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	42	42	0
One Bedroom	126	126	0
Two Bedroom	42	42	0
Three Bedroom	0	0	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: MARSHALL PLAZA	PIC Development ID: NY005010030	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No

Total Units: 180	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior	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) \$601,270,521/168,100 x 180 = \$643,835
Bedroom Type	Number of Units Pre-Conversion: 180	Number of Units Post-Conversion: 180	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	180	180	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	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: 104-14 TAPSCOTT STREET	PIC Development ID: NY005011670	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 30	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 30 = \$107,306
Bedroom Type	Number of Units Pre-Conversion: 30	Number of Units Post-Conversion: 30	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	8	8	0

Two Bedroom	20	20	0
Three Bedroom	0	0	0
Four Bedroom	2	2	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: FENIMORE-LEFFERTS	PIC Development ID: NY005011670	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 36	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 36 = \$128,767
Bedroom Type	Number of Units Pre-Conversion: 36	Number of Units Post-Conversion: 36	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	0	0	0
Two Bedroom	18	18	0
Three Bedroom	18	18	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: LENOX ROAD-ROCKAWAY PARKWAY	PIC Development ID: NY005011670	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 74	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 74 = \$264,688
Bedroom Type	Number of Units Pre-Conversion: 74	Number of Units Post-Conversion: 74	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	21	21	0
Two Bedroom	39	39	0
Three Bedroom	13	13	0
Four Bedroom	1	1	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: RALPH AVENUE REHAB	PIC Development ID: NY005011670	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 118	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 118 = \$422,070
Bedroom Type	Number of Units Pre-Conversion: 118	Number of Units Post-Conversion: 118	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	34	34	0
Two Bedroom	55	55	0
Three Bedroom	26	26	0
Four Bedroom	3	3	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Assistance):			
Name of Public Housing Development: REID APARTMENTS	PIC Development ID: NY005011670	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 230	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior	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) \$601,270,521/168,100 x 230 = \$822,678
Bedroom Type	Number of Units Pre-Conversion: 230	Number of Units Post-Conversion: 230	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	114	114	0
One Bedroom	116	116	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	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: RUTLAND TOWERS	PIC Development ID: NY005011670	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 61	Pre- RAD Unit Type (i.e., Family, Senior, etc.):	Post-RAD Unit Type if different (i.e., Family, Senior, etc.):	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) \$601,270,521/168,100 x 61 = \$218,189

Bedroom Type	Number of Units Pre-Conversion: 61	Number of Units Post-Conversion: 61	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	5	5	0
One Bedroom	43	43	0
Two Bedroom	13	13	0
Three Bedroom	0	0	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: SUTTER AVENUE-UNION STREET	PIC Development ID: NY005011670	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 100	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 100 = \$357,686
Bedroom Type	Number of Units Pre-Conversion: 100	Number of Units Post-Conversion: 100	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	17	17	0
Two Bedroom	49	49	0
Three Bedroom	34	34	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: TAPSCOTT STREET REHAB	PIC Development ID: NY005011670	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location

			if known, and # of units transferring) No
Total Units: 155	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 155 = \$554,414
Bedroom Type	Number of Units Pre-Conversion: 155	Number of Units Post-Conversion: 155	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	46	46	0
Two Bedroom	77	77	0
Three Bedroom	28	28	0
Four Bedroom	4	4	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: CROWN HEIGHTS	PIC Development ID: NY005013510	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 121	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 121 = \$432,800
Bedroom Type	Number of Units Pre-Conversion: 121	Number of Units Post-Conversion: 121	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations,

			etc.)
Studio/Efficiency	0	0	0
One Bedroom	31	31	0
Two Bedroom	78	78	0
Three Bedroom	10	10	0
Four Bedroom	2	2	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: HOWARD AVENUE	PIC Development ID: NY005013510	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 150	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 150 = \$536,529
Bedroom Type	Number of Units Pre-Conversion: 150	Number of Units Post-Conversion: 150	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	40	40	0
Two Bedroom	67	67	0
Three Bedroom	43	43	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: HOWARD AVENUE-PARK PLACE	PIC Development ID: NY005013510	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 156	Pre- RAD Unit Type (i.e., Family, Senior, etc.):	Post-RAD Unit Type if different (i.e., Family,	Capital Fund allocation of

	Family	Senior, etc.): Family	Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 156 = \$557,990
Bedroom Type	Number of Units Pre-Conversion: 156	Number of Units Post-Conversion: 156	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	0	0	0
Two Bedroom	77	77	0
Three Bedroom	79	79	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: OCEAN HILL-BROWNSVILLE	PIC Development ID: NY005013510	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 125	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 125 = \$447,108
Bedroom Type	Number of Units Pre-Conversion: 125	Number of Units Post-Conversion: 125	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	45	45	0
Two Bedroom	60	60	0
Three Bedroom	17	17	0

Four Bedroom	3	3	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: PARK ROCK REHAB	PIC Development ID: NY005013510	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 134	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 134 = \$479,300
Bedroom Type	Number of Units Pre-Conversion: 134	Number of Units Post-Conversion: 134	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	45	45	0
Two Bedroom	69	69	0
Three Bedroom	16	16	0
Four Bedroom	4	4	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: STERLING PLACE REHABS (SAINT JOHNS-STERLING)	PIC Development ID: NY005013510	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 83	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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)

			\$601,270,521/168,100 x 83 = \$296,880
Bedroom Type	Number of Units Pre-Conversion: 83	Number of Units Post-Conversion: 83	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	0	0	0
Two Bedroom	16	16	0
Three Bedroom	67	67	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: STERLING PLACE REHABS (STERLING-BUFFALO)	PIC Development ID: NY005013510	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 125	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 125 = \$447,108
Bedroom Type	Number of Units Pre-Conversion: 125	Number of Units Post-Conversion: 125	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	11	11	0
Two Bedroom	72	72	0
Three Bedroom	42	42	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Assistance):			
Name of Public Housing Development: SAMUEL (CITY)	PIC Development ID: NY005023770	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 664	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 664 = \$2,375,036
Bedroom Type	Number of Units Pre-Conversion: 664	Number of Units Post-Conversion: 664	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	13	13	0
One Bedroom	226	226	0
Two Bedroom	339	339	0
Three Bedroom	84	84	0
Four Bedroom	2	2	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: 1162-1176 WASHINGTON AVENUE	PIC Development ID: NY005013080	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 66	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 66 = \$236,073

Bedroom Type	Number of Units Pre-Conversion: 66	Number of Units Post-Conversion: 66	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	11	11	0
One Bedroom	17	17	0
Two Bedroom	10	10	0
Three Bedroom	17	17	0
Four Bedroom	11	11	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: COLLEGE AVENUE-EAST 165TH STREET	PIC Development ID: NY005013080	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 95	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior	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) \$601,270,521/168,100 x 95 = \$339,802
Bedroom Type	Number of Units Pre-Conversion: 95	Number of Units Post-Conversion: 95	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	25	25	0
One Bedroom	70	70	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	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: TELLER AVENUE-EAST 166 TH STREET	PIC Development ID: NY005013080	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 90	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 90 = \$321,918
Bedroom Type	Number of Units Pre-Conversion: 90	Number of Units Post-Conversion: 90	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	18	18	0
One Bedroom	33	33	0
Two Bedroom	23	23	0
Three Bedroom	16	16	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: CLAREMONT PARKWAY-FRANKLIN AVENUE	PIC Development ID: NY005013420	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 188	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Partially Senior	Post-RAD Unit Type if different (i.e., Family, Senior, etc.):	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) \$601,270,521/168,100 x 188 = \$672,450
Bedroom Type	Number of Units Pre-Conversion: 188	Number of Units Post-Conversion: 188	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of

			Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	132	132	0
Two Bedroom	37	37	0
Three Bedroom	19	19	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: DAVIDSON	PIC Development ID: NY005013420	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 175	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Partially Senior	Post-RAD Unit Type if different (i.e., Family, Senior, etc.):	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) \$601,270,521/168,100 x 175 = \$625,951
Bedroom Type	Number of Units Pre-Conversion: 175	Number of Units Post-Conversion: 175	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	14	14	0
One Bedroom	42	42	0
Two Bedroom	26	26	0
Three Bedroom	66	66	0
Four Bedroom	23	23	0
Five Bedroom	4	4	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: SOUTH BRONX AREA (SITE 402)	PIC Development ID: NY005013420	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No

Total Units: 114	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 114 = \$407,762
Bedroom Type	Number of Units Pre-Conversion: 114	Number of Units Post-Conversion: 114	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	0	0	0
Two Bedroom	36	36	0
Three Bedroom	66	66	0
Four Bedroom	12	12	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: UNION AVENUE-EAST 163RD STREET	PIC Development ID: NY005013420	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 200	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior	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) \$601,270,521/168,100 x 200 = \$715,372
Bedroom Type	Number of Units Pre-Conversion: 200	Number of Units Post-Conversion: 200	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	200	200	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	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: EAGLE AVENUE-EAST 163RD STREET	PIC Development ID: NY005000590	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 66	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 66 = \$236,073
Bedroom Type	Number of Units Pre-Conversion: 66	Number of Units Post-Conversion: 66	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	5	5	0
One Bedroom	21	21	0
Two Bedroom	28	28	0
Three Bedroom	11	11	0
Four Bedroom	1	1	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: EDENWALD	PIC Development ID: NY005000570	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 2039	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 2039 = \$7,293,222
Bedroom Type	Number of Units Pre-Conversion: 2039	Number of Units Post-Conversion: 2039	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	160	160	0
Two Bedroom	1253	1253	0
Three Bedroom	575	575	0
Four Bedroom	51	51	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: BELMONT-SUTTER AREA	PIC Development ID: NY005010460	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 72	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 72 = \$257,534
Bedroom Type	Number of Units Pre-Conversion: 72	Number of Units Post-Conversion: 72	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	14	14	0
Two Bedroom	36	36	0
Three Bedroom	18	18	0
Four Bedroom	4	4	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0

(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: FIORENTINO PLAZA	PIC Development ID: NY005012610	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 160	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 160 = \$572,298
Bedroom Type	Number of Units Pre-Conversion: 160	Number of Units Post-Conversion: 160	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	28	28	0
Two Bedroom	57	57	0
Three Bedroom	47	47	0
Four Bedroom	28	28	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: PENNSYLVANIA-WORTMAN AVE	PIC Development ID: NY005011940	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 336	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 336 = \$1,201,826

Bedroom Type	Number of Units Pre-Conversion: 336	Number of Units Post-Conversion: 336	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	87	87	0
One Bedroom	88	88	0
Two Bedroom	86	86	0
Three Bedroom	60	60	0
Four Bedroom	12	12	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: OCEAN HILL APARTMENTS	PIC Development ID: NY005011620	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 238	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 238 = \$851,293
Bedroom Type	Number of Units Pre-Conversion: 418	Number of Units Post-Conversion: 418	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	88	88	0
Two Bedroom	69	69	0
Three Bedroom	64	64	0
Four Bedroom	13	13	0
Five Bedroom	2	2	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: SARATOGA VILLAGE	PIC Development ID: NY005011620	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 125	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) $\$601,270,521/168,100 \times 125 = \$447,108$
Bedroom Type	Number of Units Pre-Conversion: 125	Number of Units Post-Conversion: 125	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	1	1	0
One Bedroom	31	31	0
Two Bedroom	62	62	0
Three Bedroom	30	30	0
Four Bedroom	0	0	0
Five Bedroom	1	1	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: STUYVESANT GARDENS I	PIC Development ID: NY005012210	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 331	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) $\$601,270,521/168,100 \times 331 = \$1,183,941$
Bedroom Type	Number of Units Pre-Conversion: 331	Number of Units Post-Conversion: 331	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of

			Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	2	2	0
Two Bedroom	230	230	0
Three Bedroom	72	72	0
Four Bedroom	19	19	0
Five Bedroom	8	8	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: STUYVESANT GARDENS II	PIC Development ID: NY005012210	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 150	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior	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) \$601,270,521/168,100 x 150 = \$536,529
Bedroom Type	Number of Units Pre-Conversion: 150	Number of Units Post-Conversion: 150	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	150	150	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	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: BEDFORD-STUYVESANT REHAB	PIC Development ID: NY005010730	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No

Total Units: 85	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 85 = \$304,033
Bedroom Type	Number of Units Pre-Conversion: 85	Number of Units Post-Conversion: 85	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	30	30	0
Two Bedroom	32	32	0
Three Bedroom	14	14	0
Four Bedroom	9	9	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: METRO NORTH PLAZA	PIC Development ID: NY005010090	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 275	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 275= \$983,637
Bedroom Type	Number of Units Pre-Conversion: 275	Number of Units Post-Conversion: 275	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit

			Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	82	82	0
Two Bedroom	80	80	0
Three Bedroom	78	78	0
Four Bedroom	20	20	0
Five Bedroom	15	15	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: WHITE	PIC Development ID: NY005010090	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 248	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior	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) \$601,270,521/168,100 x 248 = \$887,062
Bedroom Type	Number of Units Pre-Conversion: 248	Number of Units Post-Conversion: 248	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	128	128	0
One Bedroom	119	119	0
Two Bedroom	0	0	0
Three Bedroom	1	1	0
Four Bedroom	0	0	0

Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: WILSON	PIC Development ID: NY005010090	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 398	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 398 = \$1,423,591
Bedroom Type	Number of Units Pre-Conversion: 398	Number of Units Post-Conversion: 398	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	0	0	0
Two Bedroom	38	38	0
Three Bedroom	304	304	0
Four Bedroom	38	38	0
Five Bedroom	18	18	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: CLASON POINT GARDENS	PIC Development ID: NY005012800	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location

			if known, and # of units transferring) No
Total Units: 401	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 401 = \$1,434,322
Bedroom Type	Number of Units Pre-Conversion: 401	Number of Units Post-Conversion: 401	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	64	64	0
Two Bedroom	216	216	0
Three Bedroom	91	91	0
Four Bedroom	29	29	0
Five Bedroom	0	0	0
Six Bedroom	1	1	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: SACK WERN	PIC Development ID: NY005012800	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 413	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 413 = \$1,477,244
Bedroom Type	Number of Units Pre-Conversion: 413	Number of Units Post-Conversion: 413	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	42	42	0
One Bedroom	42	42	0
Two Bedroom	160	160	0
Three Bedroom	169	169	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: CHELSEA	PIC Development ID: NY005021340	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 425	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 425 = \$1,520,166
Bedroom Type	Number of Units Pre-Conversion: 425	Number of Units Post-Conversion: 425	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit

			Reconfigurations, etc.)
Studio/Efficiency	23	23	0
One Bedroom	140	140	0
Two Bedroom	120	120	0
Three Bedroom	99	99	0
Four Bedroom	40	40	0
Five Bedroom	3	3	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: CHELSEA ADDITION	PIC Development ID: NY005011340	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 96	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior	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) \$601,270,521/168,100 x 96 = \$343,379
Bedroom Type	Number of Units Pre-Conversion: 96	Number of Units Post-Conversion: 96	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	0
One Bedroom	96	96	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	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: ELLIOTT	PIC Development ID: NY005011340	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 608	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 608 = \$2,174,732
Bedroom Type	Number of Units Pre-Conversion: 608	Number of Units Post-Conversion: 608	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	21	21	0
One Bedroom	47	47	0
Two Bedroom	357	357	0
Three Bedroom	163	163	0
Four Bedroom	19	19	0
Five Bedroom	1	1	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: FULTON	PIC Development ID: NY005001360	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No
Total Units: 944	Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family	Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family	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) \$601,270,521/168,100 x 944 = \$3,376,558
Bedroom Type	Number of Units Pre-Conversion: 944	Number of Units Post-Conversion: 944	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	72	72	0
One Bedroom	288	288	0
Two Bedroom	288	288	0
Three Bedroom	192	192	0
Four Bedroom	97	97	0
Five Bedroom	7	7	0
Six Bedroom	0	0	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 resident rights listed below are from HUD Notice H-2019-09 PIH-2019-23 (HA), (September 5, 2019) Rental Assistance Demonstration REV-4 – Final Implementation (the “Notice”), Section 1.6 C and Section 1.6 D):

1.6.C. PBV Resident Rights and Participation.

1. **No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute², at conversion, current households cannot be excluded from occupancy at the Covered Project³ based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project⁴ will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.⁵ Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, Section 8(o)(4) of the Act⁶ and 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, HUD waives Section 8(o)(4) and 24 CFR § 982.201 to the extent necessary for this provision to apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR Part 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.⁷

2. **Right to Return.** See Section 1.4.A.5(b) of the Notice referenced below and the RAD Fair Housing, Civil Rights, and Relocation Notice (as defined below) regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.
 - i. **RAD Fair Housing, Civil Rights, and Relocation Notice.** Relocation requirements related to public housing conversions under RAD are described in

² 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 16, 2014), the Consolidated Appropriations Act, 2016 (Pub. L. No. 114-113, approved December 18, 2015), the Consolidated Appropriations Act, 2017 (Pub. L. No. 115-31, approved May 5, 2017), and section 237 of Title II, Division L, Transportation, Housing and Urban Development, and Related Agencies, of the Consolidated Appropriations Act, 2018 (Pub. L. 115-141, approved March 23, 2018) collectively, the "RAD Statute."

³ *Covered Project* - The post-conversion property with assistance converted from one form of rental assistance to another under the Demonstration.

⁴ *Converting Project* - The pre-conversion property whose assistance is converting from one form of rental assistance to another under the Demonstration.

⁵ These protections (as well as all protections in this Notice for current households) also apply when a household is relocated to facilitate new construction or repairs following conversion and subsequently returns to the Covered Project.

⁶ The U.S. Housing Act of 1937 as may be amended.

⁷ For non-RAD PBV households, applicable program requirements include 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.

the RAD Fair Housing, Civil Rights, and Relocation Notice.⁸ The RAD Fair Housing, Civil Rights, and Relocation Notice provides PHAs and their development partners with information and resources on RAD program requirements, Uniform Relocation Act (URA) requirements, and other requirements which may be applicable such as Section 104(d) of the Housing and Community Development Act of 1974, as amended (Section 104(d)) 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 RAD website at www.hud.gov/rad. The primary source for First Component relocation requirements and guidance is 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. **Section 1.4.A.5(b) of the Notice.** Section 1.4.A.5(b) of the Notice states:

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.

⁸ Please see Attachment 0 beginning on page 297 for the full text of the "Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions" Notice H 2016-17; PIH 2016-17 (HA), as may be amended from time to time at https://www.hud.gov/sites/documents/16-17HSGN_16-17PIHN.PDF.

- 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.⁹

- 3. Phase-in of Tenant Rent Increases.** If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10 percent or \$25, 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 and must communicate such policy in writing to affected residents. 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 (the first recertification following conversion), as illustrated below.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the 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 TTP¹⁰

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

⁹ This provision does not preclude a PHA from receiving tenant protection vouchers for a property that has also received a Choice Neighborhoods Implementation grant.

¹⁰ 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.

- 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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

- 4. 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 participate in the PHA’s FSS program. 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. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that until provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act are implemented, 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 (current, or as amended), 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 78100.¹¹ Further, upon conversion to PBV, if the PHA no longer has a public housing program, funds already escrowed 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.¹²

¹¹ 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.

¹² Where the PHA maintains a public housing program, any forfeited funds that had been escrowed prior to

For information on FSS PIC reporting requirements for RAD conversions, see Notice PIH 2016-08 at <http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016-08.pdf>.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the 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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

- 5. 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. To facilitate the uniform treatment of residents and units at a Covered Project, any non- RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.
- 6. 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 (HUD Form 52530-c), 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 and to non-RAD PBV units at the Covered Project. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be :
 - a. A reasonable period of time, but not to exceed 30 days:
 - 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.

conversion would revert to the PHA’s Operating Reserves.

- 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 the termination of assistance and several other PHA determinations, PBV program rules require the PHA 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),¹³ 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.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

7. **Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4 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

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

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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

- 8. 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 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. If the program is continued, the Project Owner must agree to continue to implement the program according to HUD's program requirements. Jobs Plus target public housing projects must enroll public housing residents into the Jobs Plus rent incentive, JPEID, prior to conversion. Any resident of the Covered Project that had not enrolled prior to conversion is not eligible to enroll in JPEID but may utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Covered Project may voluntarily utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion.
- 9. 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. During any period 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.¹⁴ 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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

Unless a waiver is requested and approved as described below, any new admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or 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 left 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 the Notice.

A PHA may request a waiver from HUD for the Covered Project in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not made a housing assistance payment for a family in 180 days.

For a Covered Project that consists of 100 percent RAD PBV units, the PHA must demonstrate that a waiver is necessary in order to avoid an undue concentration of poverty at the Covered Project. A PHA may evidence this by providing data showing, for example:

- how eligible income-certified applicants on the waiting list must be passed over because their incomes result in zero HAP at admission causing a higher concentration of poverty at the covered project; or
- how the income of newly admitted families is causing a markedly higher concentration of poverty than the PHA's non-RAD PBV projects.

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

For any other Covered Project, the PHA must demonstrate that the property contains specific units (e.g., units suitable for large families or accessible units) for which there are insufficient alternative housing opportunities.

If the waiver is approved, the new admission[s] families covered under the waiver are participants under the program and all of the family obligations and protections under

RAD and PBV apply to the family, and the unit is subject to all program requirements. Such waiver requests should be submitted to the PIH Field Office in accordance with Notice PIH 2018-16.

- 10. 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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

1.6.D. PBV: Other Miscellaneous Provisions

- 1. 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).¹⁵

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's emergency transfer plan. This includes allowing for easier moves between assisted properties.

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). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Same Covered Project shall be subject to the terms of this provision.

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

- 2. 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

¹⁵ 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.

RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD.

The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) of the Act and 24 CFR § 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

I - 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 the RAD Fair Housing, Civil Rights, and Relocation Checklist to HUD as required by *HUD Notice H-2019-09 PIH-2019-23 (HA), Rental Assistance Demonstration REV-4 – Final Implementation* and will comply with the fair housing, civil rights and relocation requirements under the RAD program as stated in Notice H 2016-17, PIH Notice 2016-17 (HA)-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 beginning on page 297 for the full text of this RAD Fair Housing, Civil Rights, and Relocation Notice.

II – Site Selection and Neighborhood Standards

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

III – 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 111 – 157 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 2021 CAPITAL FUND GRANT AND 5-YEAR
ACTION PLAN ON MAY 3, 2021.**

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 90 Church Street, New York, New York, at (212) 306-3123 or by emailing annualplancomments@nycha.nyc.gov 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.

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% of AMI	906,981	5	5	4	1	3	4
Income >30% but <=50% of AMI	461,148	5	5	4	1	3	4
Income >50% but <80% of AMI	546,429	5	5	3	1	3	3
Elderly (62+)	918,898	5	5	4	4	2	3
Families with Disabilities	486,362	5	5	3	4	3	3
Race/Ethnicity							
Hispanic	801,259	5	5	4	1	3	4
Black	683,200	5	5	4	1	3	4
White	1,210,752	5	5	4	1	3	4
Asian	390,571	5	5	4	1	3	4
Other	81,278	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:
Other housing market study
Indicate year: 2015 - 2019
- 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 Population Division of the New York City Department of City Planning utilizing data from: U.S. Census Bureau, 2015-2019 American Community Survey—Public Use Microdata Sample.

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.

Housing Needs of Families on the PHA’s Waiting Lists – Public Housing (As of 8/24/21)			
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 ¹⁶
Waiting list total	233,567		2.2%
Extremely low income <=30% AMI	183,586	79%	
Very low income (>30% but <=50% AMI)	40,357	17%	
Low income (>50% but <=80% AMI)	9,623	4%	
Income Not Reported	1	0%	
Families with children	94,139	40%	
Elderly families	44,607	19%	
Families with Disabilities ¹⁷	40,411	17%	
Race/Ethnicity			
White	13,741	6%	
Black	45,799	20%	
Hispanic	102,205	44%	
Asian	18,558	8%	
Native American	1,166	0%	
Native Hawaiian	562	0%	
Other	51,536	22%	
Characteristics by Bedroom Size			
0 BR	98,201	42%	
1BR	42,725	18%	
2 BR	72,524	31%	
3 BR	16,063	7%	
4 BR	3,995	2%	
5+ BR	57	0%	
Data Not Available	2	0%	

¹⁶ Figure represents turnover (move-outs from Public Housing) during 2020.

¹⁷ “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 8/24/21)**

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 4/28/2021)**

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 ¹⁸	36,072		5.33% (2020)
Extremely low income <=30% AMI	31,601	87.6%	
Very low income (>30% but <=50% AMI)	2,047	5.7%	
Low income (>50% but <=80% AMI)	95	0.3%	
Income Not Reported	2,329	6.5%	
Families with Children	17,789	49.3%	
Elderly Families	9,239	25.6%	
Families with Disabilities ¹⁹	7,975	22.1%	
Race/Ethnicity			
White	3,430	9.5%	
Black	9,994	27.7%	
Hispanic	18,942	52.5%	
Asian	899	2.5%	
Native American	127	0.4%	
Native Hawaiian	22	0.1%	
Other	2,658	7.4%	
Characteristics by Bedroom Size			
0 BR	12,008	33.3%	
1 BR	9,769	27.1%	
2 BR	11,620	32.2%	
3 BR	2,274	6.3%	
4+BR	312	0.9%	
5+ BR	45	0.1%	
Data Not Available	44	0.1%	

¹⁸ 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.

¹⁹ “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 4/28/2021)

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. The waiting list was partially opened in 2020 to accept referrals for participating FUP Youth whose assistance is expiring and NYPD referrals.

If yes:

How long has it been closed (# of months)? 172 months as of September 15, 2021

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 80% of the families admitted to public housing during calendar year 2020 were 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 30, 2021, HUD approved NYCHA's request 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)

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 –
FY2020 to FY2024**

Section A: Goals Related to NYCHA’s Monitoring Agreement

On January 31, 2019, NYCHA and the City of New York signed an Agreement with HUD, which outlines specific deadlines and objective compliance standards for making significant improvements in several high-priority areas, including heat and elevator service, pests, lead-based paint, inspections, and mold. This section sets forth a summary of specific goals and deadlines enumerated in the Agreement, as well as related strategies and goals not specifically required by the Agreement but developed to improve resident quality of life. Where provided, the “progress” sections provide information about NYCHA’s compliance with or efforts towards meeting the relevant goals and deadlines. NYCHA has also established new departments and units – including a Compliance Department, an Environmental Health and Safety Department, and a Quality Assurance Unit – as part of the Agreement. The Agreement provides an opportunity for NYCHA to work with a Monitor appointed under the Agreement (referred to as “the Monitor” below) to make significant improvements that will benefit residents.

Many of these goals will be met through the Action Plans that were developed and have been approved by the Monitor, as required by the Agreement.

Lead-Based Paint

Goal: Management of Lead-Based Paint Risks

Objective: By September 30, 2019, NYCHA will train all 900 maintenance staff to conduct visual assessments to identify lead-based paint hazards.

Progress: As of August 31, 2021, 807 maintenance workers (80% of all maintenance workers) have been trained to conduct visual assessments to identify lead-based paint hazards.

Objective: By 2020, NYCHA will use XRF technology to test over 134,000 apartments built before 1978. By the middle of 2019, as lead paint tests are completed, NYCHA will publish statistics on the progress of the testing initiative and its results.

(<https://my.nycha.info/PublicSite/Transparency/XrfReport>)

Progress: In April 2019, NYCHA kicked off an unprecedented \$88 million effort to test approximately 134,000 apartments for the presence of lead-based paint using high-tech XRF analyzers. Testing began at Harlem River Houses on April 15, 2019 and has been completed at the 92 developments that are most likely to have lead-based paint in apartments. NYCHA is currently testing in developments that are less likely to have a high presence of lead-based paint in apartments.

Due to COVID-19, NYCHA temporarily suspended entry into units for XRF testing and did not complete testing in all 134,000 units by the end of 2020. NYCHA has restarted the XRF testing in units and hopes to complete testing in 2021.

As of August 26, 2021, 100,070 apartments have been tested using XRF technology. NYCHA published a dashboard online that reports the progress of the XRF testing, which is available at: <https://my.nycha.info/PublicSite/Transparency/XrfReport>.

Objective: By January 31, 2024, NYCHA will abate all lead-based paint at the Harlem River Houses and the Williamsburg Houses.

Progress: Both Williamsburg Houses and Harlem River Houses are part of NYCHA's PACT Program in the coming year, and the abatement requirements will be achieved through that program.

Objective: By January 31, 2039, NYCHA will abate all lead-based paint in apartment units that contain lead-based paint, and interior common areas that contain lead-based paint in the same building as those units. NYCHA must also develop an action plan to abate exterior common areas that contain lead-based paint.

Progress: NYCHA continues to develop strategies to meet this objective. Part of the strategy is the NYCHA XRF Initiative, which will test components in each apartment that requires abatement, allowing NYCHA to define the scope of work and produce reliable cost estimates associated with abating each of its properties. The Action Plan for the \$2.2 billion in City capital funds provided pursuant to the Agreement, which was approved by the Monitor in May 2021, allocates \$771.8 million to a lead abatement pipeline that, combined with other funding sources, will be utilized to advance abatement across the portfolio. The Action Plan also allocated more than \$450 million to comprehensively renovate two sites with pervasive mold conditions and units with several positive lead-based paint components. Finally, since December 2021 NYCHA also won two competitive grants from HUD – (i) a grant to abate lead-based paint at Red Hook Houses in the amount of \$5 million, and (ii) a grant to abate lead-based paint in units with a child under six years old in the amount of \$7.25 million.

Heat

Goal: Improving the Provision of Heat

Objective: NYCHA will comply with N.Y.C. Admin. Code § 27-209(a), which requires NYCHA to maintain the following temperatures in apartments during the heating season (October 1 through May 31):

- a) between the hours of 6:00 a.m. and 10:00 p.m., a temperature of at least 68 degrees Fahrenheit whenever the outside temperature falls below 55 degrees; and
- b) between the hours of 10:00 p.m. and 6:00 a.m., a temperature of at least 62 degrees Fahrenheit.

Progress: As required, NYCHA continues to work towards compliance with N.Y.C Admin. Code § 27-209(a).

Objective: By and after October 1, 2024, NYCHA will ensure that, during any given heating season:

- a) no more than 15% of occupied apartments, as measured according to procedures established in an Action Plan which may include a reliable sampling method, will have an occasion in which the temperatures fall below the legal limits, and
- b) the temperature will not fall below the legal limits on more than three separate occasions in a given unit.

Progress: NYCHA continues to work with the Monitor to analyze existing work order and electronic monitoring data to develop a reliable sampling method. NYCHA will continue to work on reports that

will show (i) which units have recurring complaints of “no heat” and (ii) which units have temperature readings below the legal limit, which have been taken either via sensors or when employees are in a unit responding to a complaint.

Objective: By December 31, 2020, NYCHA will install electronic temperature monitoring to provide the Authority with a comprehensive understanding of heating conditions in 44 developments, which will include electronic temperature monitoring in no fewer than 30% of NYCHA apartments in these developments. A schedule will be established in an Action Plan with deadlines for NYCHA to install such monitoring systems in the remainder of its developments.

Progress: Despite COVID-19 delays, 39 locations were online prior to December 31, 2020, and 46 developments are online as of August 17, 2021. NYCHA has an additional 10 developments in construction and 7 developments are in procurement. NYCHA has procured 4 Energy Service Companies (ESCO) for the next set of EPCs to install temperature sensors and task orders have been issued for 29 developments.

Goal: Improved Response to Heating Failure

Objective: By October 1, 2019, NYCHA will establish an Action Plan that identifies, for each development, how NYCHA will respond to heating outages, taking into account resident populations, historical data about prior outages, the availability of on-site and remote maintenance personnel, and response times. The plan will include provisions for alternative heated community spaces for heating outages that are expected to last for a substantial duration. The plan will also address NYCHA’s policies for closing out work orders when the resident is not available at home or otherwise does not provide access to his or her apartment to resolve a heating outage. The plan will be made available to the residents and posted online.

Progress: Individual Development Action Plans were completed and are fully accessible to all stakeholders via the following link: <https://my.nycha.info/DevPortal/>. The Monitor also transmitted an Action Plan for heat, which is fully accessible to all stakeholders via the following link: <https://www1.nyc.gov/assets/nycha/downloads/pdf/Heating-Action-Plan-12.4.19.pdf>.

Objective: Starting with the heating season beginning October 1, 2019, NYCHA will:

- a) Restore heat to units affected by a heating shortage within an average of 12 hours.
- b) During the heating season, for 85% of heating shortfalls, NYCHA will restore heat to affected units within 24 hours, and in no event more than 48 hours. NYCHA may restore heat through the use of temporary replacement heating systems that comply with the N.Y.C. Admin. Code.
- c) In any event in which heat is unable to be restored to a particular unit within 12 hours, appropriate NYCHA personnel distinct from the NYCHA personnel responsible for the heat restoration, as identified in an Action Plan, will undertake an investigation to determine the root cause(s) of such initial failure of the heating system and the failure to achieve the restoration of service within the timeframe, identify corrections to prevent or lessen the recurrence of such failures, and track the implementation of such corrective actions. Such information will be retained in a central repository to which all applicable maintenance staff and management have access.

Progress: In the 2019-2020 heat season, heat outages were resolved in 7.7 hours. NYCHA has improved its performance in the 2020 – 2021 heating season, with the average duration of a heating outage being 7.3 hours. 99.8% of outages were resolved within 24 hours and there were no outages over 48 hours. These improvements can be attributed to the Heating Management Services Department (HMSD) 24x7 heat desk operation, where HMSD staff track work orders and use technology to identify

triggers for potential service disruptions and quickly deploy staff. In addition, as of January 2nd, 2021, NYCHA assigned 16 additional Plumbing Teams dedicated to heating plumbing related repairs. Moreover, during extreme cold days, NYCHA activates a “Situation Room” to coordinate the response for interruptions and mobilization of resources in real time, and the constant monitoring of outage data to identify issues proactively.

Goal: Other Heating Obligations

Objective: In addition to meeting the goals above, NYCHA will perform the following tasks:

- By March 31, 2019, NYCHA will create a 24/7 Heat Desk that will monitor heating metrics and dispatch staff to correct deficiencies during the heating season.

Progress: NYCHA established a 24/7 Heat Desk on January 14, 2019.

Objective: In addition to meeting the goals above, NYCHA will perform the following tasks:

- NYCHA will replace or address approximately 500 boilers by 2026
 - 297 boilers will be replaced by December 31, 2026 through NYCHA’s Capital Plan

Progress: Since the HUD Agreement was signed in 2019, NYCHA has turned over 60 new boilers at 21 developments. As part of the Mayor’s Heating Initiative, the existing boilers at 11 developments will be replaced with 34 new high efficiency boilers. Construction is underway for this portfolio and the old boilers have been removed and temporary boilers have been installed. To date, 11 boilers have been replaced at 4 developments. In 2021, replacement of an additional 5 boilers at 1 development will be completed. In 2022, another 8 boilers will be replaced at 2 developments. By 2023, the remaining 10 boilers at 4 developments are projected to be replaced, for a total of 34 boilers installed.

The State-funded Heating pipeline is divided into two groups, Phase I & Phase II. For Phase I, the 37 existing boilers at 9 developments will be replaced by heating systems proposed by Design Build contractors that meet NYCHA's technical and environmental requirements. The first of these projects are expected to begin construction in the 4th quarter of 2021. Phase I will conclude in 2025. For Phase II, heating plant upgrades at 16 developments are planned over the course of 4 years (from 2023-2026).

Mold

Goal: Decreasing Mold Incidence and Recurrence

Objective: By January 31, 2024:

- a) For 85% of verified mold complaints, there will not be a second verified mold complaint in the same unit or the same common area room or hallway within a 12-month period.

Progress: As of August 2021, 88.5% of units and 94% of common area complaints did not have a second verified complaint.

- b) No more than 15% of verified mold complaints will be for mold covering 10 or more square feet in a unit or common area that is visible from within such unit or common area, unless NYCHA can document to the satisfaction of the Monitor that after having been advised by NYCHA to report incidences of mold, the resident did not report the incidence of mold until after the mold had reached this extent.

Progress: As of August 2021, 88% of verified mold complaints in units and 71% of mold complains in common areas covered more than 10 square feet.

- c) Mold will not appear more than three times in a year in any single unit.

Progress: As of August 2021, there were 97 units where mold appeared more than three times.

Goal: Remediation of Mold and Moisture

Objective: By January 31, 2021:

- a) For 95% of instances in which a resident reports a mold complaint that is subsequently verified or NYCHA identifies mold in a unit, consistent with the NYCHA Standard Procedure SP 040:14:1, *Mold/Mildew Control in NYCHA Residential Buildings*, December 19, 2018 (revised February 26, 2020), within five business days of the resident reporting or NYCHA identifying mold in the unit, NYCHA will prepare and provide a written plan for addressing the root cause to the resident. NYCHA may meet this standard by mailing a copy of the written plan to the resident via U.S. or electronic mail within the five-day period.

Progress: As of August 2021, (cumulative), NYCHA printed the written plan within five business days for 68% of verified mold complaints. As part of the Mold Busters process, Property Maintenance Supervisors (PMS) and Assistant Property Maintenance Supervisors (APMS) are primarily responsible for conducting the mold inspection. In August 2020, the responsibility was extended to Property Managers to serve as back-ups. However, when looking at quarterly trends and the metrics outlined, NYCHA sees that it still must work to decrease the number of days between a complaint and a Mold Busters inspection. To improve operational response to inspect mold conditions and provide relief to the PMS and APMS, from September to December 2021, NYCHA's Office of Mold Assessment and Remediation will be spearheading a pilot project to expand the inspection responsibility to Maintenance Workers. There are more Maintenance Workers than PMS and APMS and they have experience conducting annual apartment inspections. The pilot will take place at Castle Hill, Edenwald, Marble Hill, Melrose and Mitchel Houses. As part of this project, each development will select two Maintenance Workers, who will complete the required Mold Busters Training - *Mold: Inspection and Mold: Building Science – Inspector* classes. They will also shadow the PMS and APMS staff during the inspections as part of the field training before they will be able to independently perform the inspections.

- b) For 95% of instances in which a resident reports a mold complaint that is subsequently verified or NYCHA identifies mold in a unit, consistent with the NYCHA Standard Procedure SP 040:14:1, *Mold/Mildew Control in NYCHA Residential Buildings*, December 19, 2018 (revised February 26, 2020), within four calendar days of the resident reporting or NYCHA identifying mold in the unit, NYCHA will schedule the initial mold inspection. In addition, NYCHA must remediate mold and its underlying root cause (i) within 7 days, for repairs that can be performed by a Maintenance Worker or Caretaker, or (ii) within 15 days, for repairs that must be performed by skilled trades workers or other specialized staff in one or more visits.

Progress: As of August 2021 (cumulative), 20% of simple mold repairs were remediated within 7 days and 6.4% of complex repairs were remediated within 15 days. COVID-19 has affected operational response in 2020 and 2021 as some paint related work was suspended once the emergency state came into effect. The work order guidance contributed to an increased backlog of mold and leak paint related child work orders. On February 12, 2021, NYCHA launched the Mold and Leak Prioritization Initiative (MLP) – Interdepartmental Effort with the goal to strategically reduce the mold work order backlog on

an expedited schedule through a unified effort across the Authority. The suspension on painting was lifted on January 19, 2021. As of July 30, 2021, NYCHA has closed 18,863 work orders (54%) of the initial 34,713 work orders identified as part of the MLP. In addition, NYCHA continues to address the backlog of aging mold and leak work orders through its Long-Term Pending Work Order Initiative (LTP). As of July 26, 2021, NYCHA has closed 17,777 work orders (91%) of the 19,608 work orders identified as part of the MLP.

- c) For 95% of reports to NYCHA of floods, leaks from above, and other conditions that cause sustained or recurrent moisture to flow into a resident's unit or the walls of the unit, NYCHA will abate the condition within 24 hours of a report of the condition to NYCHA, and NYCHA will remove any standing water that resulted from such condition within 48 hours of the report.

Progress: As of August 2021 (cumulative), 67.79% of leaks and flooding conditions were abated within 24 hours. As part of the Leak Standard Procedure Pilot 2.0 ("Leak SP Pilot 2.0"), OMAR will be rolling out an IT enhancement to include the following two mandatory assessment questions in the initial inspection for all the emergency leaks: (1) "Is there flooding condition?" and (2) "Is there standing water?". These questions are being included to measure compliance with 24- and 48-hour requirements, respectively. The Leak SP Pilot 2.0 will take place from October through December 2021 at Brevoort Houses, Low Houses, Roosevelt I and Roosevelt II Houses. The pilot will further inform the implementation and rollout of the Leak Standard Procedure NYCHA-wide.

Objective: By the end of 2019, train 2,900 staff to improve mold inspections and to investigate building-level systems that contribute to mold.

Progress: NYCHA completed implementation of "Mold Busters" citywide (139 consolidations or all developments) on September 2, 2019. Mold Busters involves an updated mold inspection protocol; a new and comprehensive Mold Standard Procedure; new hands-on training for staff; and new tools for the effective and efficient identification and remediation of mold. NYCHA closed the initial training program on December 2019 by training 2,870 of the 2,900 staff (99%). Due to attrition rates at the agency, the Mold Busters trainings continued in 2020 for newly hired staff. Due to COVID-19, Mold Busters training was put on hold until NYCHA's vendor could scale up a partially virtual training. Mold Busters training resumed on September 21, 2020.

As of August 5, 2021 938 additional employees received training in the following courses: *Mold: Inspection*, *Mold: Building Science for Inspectors*, *Mold: Building Science for Maintenance Workers*, and *Mold: Remediation Methods* (see table below for details below).

In March 2021, OMAR and NYCHA's Learning and Development (L&D) department worked with the training vendor, Environmental Education Associates (EAA) to increase the number of classes administered and the class capacity for the Mold Inspection course. OMAR observed a great need for mold inspectors to be trained as quickly as possible and EAA added four (4) additional Mold Inspection classes and four (4) additional Building Science for Inspectors classes to ensure Mold Inspectors are trained as quickly as possible. Additionally, the class capacity for mold Inspectors was increased from 16 to 20-22.

The traditional Mold Busters training is given to all new NYCHA staff. The training represents a mix of online and in-person learning. This training is given to all newly hired staff as well as anyone that is flagged by the Compliance Department to be retrained. In addition, NYCHA offers *Mold Busters Refresher Training*. This training is for staff who took the original Mold Busters training in 2019 and is due for a refresher course. *Refresher Training* is a 4-hour virtual course.

As of August 5, 2021, there were 181 employees pending the Mold Busters training as indicated in the chart below.

Mold Busters Training Update

Mold Courses	Employees Trained 9/21/2020 to 8/5/2021	Employees Pending Training as of 8/5/2021
Remediation Methods	533	68
Inspection	74	28
BS for Inspector	73	41
BS for Maintenance Workers	258	44
Total:	938	181

Objective: Improve communication and notification to tenants regarding mold starting in 2019.

Progress: Mold Busters is a vital part of NYCHA’s commitment to providing residents with the healthy and safe homes they deserve. NYCHA launched Mold Busters in January 2019 and the initiative was fully implemented on September 2, 2019. NYCHA’s work to communicate with residents about the citywide Mold Busters rollout began with an introduction to the initiative included in all rent bills at the end of 2018. In April and May 2019, NYCHA conducted two webinars for residents and health and community partners. NYCHA’s Department of Resident Engagement shared a Mold Busters fact sheet with resident leaders in June 2019 and this informational resource was shared broadly with residents throughout the year. Residents and partners can access a range of information about Mold Busters on the web page, <https://www1.nyc.gov/site/nycha/residents/mold-busters.page>. NYCHA continues to work with partners such as the NYC Department of Health, elected officials and community stakeholders to share critical information on how to identify mold conditions and limit moisture and mold growth in resident apartments.

NYCHA worked with the vendor *3x3 Design* for six months with internal and external stakeholders to refine NYCHA’s resident outreach and create collateral for residents. NYCHA’s Mold Response Unit (“MRU”) engaged 116 resident association board members about the Resident Information campaign on mold. During that time, the Mold Campaign Educational Booklet, Mold Campaign Posters and Door Hangers were created. The vendor worked closely with NYCHA’s Department of Communications to update the existing website and social media platforms to include a detailed guidance on how to recognize and report mold as well as to include a detailed overview of NYCHA’s steps and obligations to remediate mold. In June 2021, NYCHA’s Resident Engagement Department sent an updated email to the resident association leaders with the collateral attached. In July 2021, the campaign posters were posted in all of the NYCHA developments. NYCHA’s Resident Engagement Department is also conducting outreach to NYCHA locations with natural and mechanical ventilation that have been identified with the highest number of mold and leak work orders. The Mold Campaign Educational Booklet will be distributed to the entire NYCHA portfolio. The Campaign videos are in the final stages to be included on the existing website. More information regarding the Mold Busters campaign, including educational materials related to mold and mold prevention and NYCHA’s Mold Standard Procedure, may be found at <https://www1.nyc.gov/site/nycha/residents/mold-busters.page>.

In addition, as of August 2021, NYCHA has 27 (out of 30) Resident Communication Associates (RCA) – 6 of which are NYCHA residents. Interviews are in progress to replace 3 staff members who have

accepted other offers outside of the Authority. The RCA role has been to coordinate with development staff and residents to ensure completion of all remediation work. NYCHA's MRU has supported the independent court-appointed Ombudsperson Call Center (OCC) by using various engagement platforms to raise awareness of the OCC to NYCHA residents. The MRU team continues to engage resident leaders and conduct targeted outreach to NYCHA developments which historically have a higher rate of mold complaints. MRU continues to work with internal departments to disseminate OCC information and messaging. As of August 2021, MRU assisted 7,999 cases and fully completed 5,600 cases.

Objective: Continue and accelerate roof repairs:

- a) By 2019, replace 96 additional roofs, benefitting 24,000 residents.

Progress: As of July 2021, 212 roofs have been replaced, benefitting approximately 48,000 residents. Twenty-eight (28) additional roof replacements will be completed by December 31, 2021.

Elevators

Goal: Improving Elevator Service

Objective: By January 31, 2022:

- a) 70% of buildings containing more than one elevator will have no more than one instance per year where all elevators are out of service (whether planned or unplanned) at the same time, and no such building will have more than three instances in a year.
- b) 70% of elevators in all buildings will have an unplanned outage no more than eight times per year, and no elevator will have unplanned outages more than 15 times a year.

Progress: NYCHA has substantially completed a metrics dashboard which is being used to report on the Agreement obligations. Under (b) above, from June 30, 2020 to June 30, 2021, 1,974 of 2,872 elevators had unplanned outages eight or fewer times (62.41%) and 333 elevators had an unplanned outage more than 15 times in a year. In order to meet the obligation by January 2022, NYCHA will continue to invest in air conditioners in motor rooms and other equipment upgrades that will reduce the occurrence of outages. NYCHA is also adding elevator mechanics and other staff to increase the amount of preventive maintenance it conducts to prevent recurring outages. NYCHA is also using data to anticipate which elevators with recurring issues require other interventions or capital upgrades.

Goal: Improved Response to Disruptions in Service

Objective: For the first year after January 31, 2019, NYCHA will reduce the duration of service outages by 10%, and 75% of no-service conditions will be resolved within 18 hours of the time NYCHA learns of them. The response rate will improve each year thereafter as determined by the Monitor and HUD based on the data NYCHA provides to the Monitor and HUD and the steps NYCHA has taken in executing its Action Plans.

Progress: As of August 2021 (cumulative), 96% of no service conditions were resolved within 18 hours. The duration was 10.4 hours in 2020 compared to 8.2 hours in 2019. The COVID work order guidance severely limited preventive maintenance on NYCHA's elevators. In 2020, NYCHA resumed preventive maintenance however the duration time climbed to 11.12 hours as of September 2021. NYCHA will improve its response rate in part by hiring additional elevator mechanics and other staff, and by reducing the total volume of outages by investing in equipment and other capital upgrades. NYCHA will also continue to proactively seek changes in the schedules and shifts of elevator mechanics in order to make sure it can address outages that occur in peak commuting hours.

Goal: Improved Outage Identification and Notice

Objective: By July 31, 2019, NYCHA will institute and maintain a system that identifies every elevator outage and the start and end times of such outages identified by remote monitoring systems, work-order records, or any additional sources of outage information, and make that system accessible and available to all NYCHA personnel responsible for elevators and to other relevant personnel, including all development managers and the General Manager.

Progress: NYCHA met this obligation on a timely basis using its Maximo asset management software and a set of data reporting tools that have been built over time.

Objective: By July 31, 2019, NYCHA will establish a system to provide residents of buildings affected by a planned outage 24-hours advance notice, and to provide residents of buildings affected by an unplanned outage notice within two hours of NYCHA learning of the outage. Such notice will include instructions regarding what assistance NYCHA has available for individuals with mobility impairments during the outage. Notice will occur by robocall and via postings within the affected building and on NYCHA's website.

Progress: NYCHA has enhanced its communications with residents regarding elevator outages. Residents affected by an unplanned outage are notified within two hours of the time NYCHA learns of the outage. Simultaneously, starting in November 2020, residents who may be affected by a planned outage are given at least 24 hours' notice of that outage through building flyers and notification of resident leaders.

Goal: Other Obligations to Improve Elevator Service

Objective: NYCHA will replace or address at least 425 elevators by 2024:

1. 275 elevators will be replaced by December 31, 2024, through NYCHA's capital plan.
2. NYCHA will transfer 150 additional elevators to third-party management through the PACT Section 8 conversion program by December 31, 2024. The developer selected through PACT will replace elevators as needed in buildings under its purview.

Progress: As of August 2021, construction work for two elevators at Boston Road Plaza have been completed and both cars are in service. Two hundred and five (205) elevators at thirteen (13) developments are currently in design or procurement, the construction of which is slated to start in 2021. Construction is planned to start in 2022 at an additional 9 developments to replace 107 elevators. Through NYCHA's capital plan, two hundred and eighty-four (284) elevators are scheduled to be replaced by the end of 2024.

Pests

Goal: Pest Population Reduction

Objective: By January 31, 2022, NYCHA will achieve a 50% reduction of its rat population across its portfolio, a 40% reduction in its mice population across its portfolio, and a 40% reduction in its roach population across its portfolio. By that time, NYCHA will also achieve a percentage reduction in its bedbug population across its portfolio, to be determined by the Monitor.

Progress: NYCHA has begun to use an Integrated Pest Management (IPM) approach to reduce pests, which is a holistic look at pest control. To that end, Health Department inspections have seen a 64 percent decline in rat burrows from the baseline measurement taken in summer/fall 2017 and summer 2019 (depending on when the development entered the program) at the 112 developments that are part of the City's Neighborhood Rat Reduction program.

In early 2020, NYCHA began surveying randomly selected apartments for their level of pest infestation. This program is called the NYCHA Pest Infestation Index. Inspections were suspended due to COVID-19 and the Monitor, NYCHA, and HUD are working to confirm how work order data, combined with inspection results, can be utilized to set an accurate pest baseline. Once that baseline is determined, NYCHA will track reductions in its pest population using that baseline.

Goal: Improved Response to Resident Complaints

Objective: By January 31, 2021, NYCHA will:

- a) Respond to 75% of all rat complaints within two business days, and to all rat complaints within five days;

Progress: As of August 2021, 41% of rat complaints were responded to within two business days and 51% within five calendar days.

- b) Respond to 75% of all other pest complaints within seven days, and to all other pest complaints within 10 days;

Progress: As of August 2021, 25% of other pest complaints were responded to within seven days and 30% were responded to within 10 calendar days.

- c) Apply effective pest control methods (in compliance with applicable law, including the Federal Insecticide, Fungicide, and Rodenticide Act, 7 U.S.C. § 136 *et seq.*), to address any verified complaints within seven days; and
- d) Provide expedited response and application of pest control methods in cases where NYCHA is aware that a resident of the unit has asthma or another condition generally recognized as being caused or exacerbated by exposure to pest infestations (for example, other respiratory illness, immune deficiency/suppression, and/or effects of certain medical treatments). In an Action Plan, NYCHA and the Monitor will establish a procedure for informing residents of a process through which residents may notify NYCHA if anyone residing in a unit has such a health condition.

Progress: NYCHA developed a dashboard to track progress toward the above metrics. This dashboard was substantially completed in April 2021. From January 2021 through mid-September 2021, 51.86% of rat work orders were responded to within 2 business days, and 64.44% were responded to within five calendar days. During that same time period, 41.91% of other pest type work orders were responded to within seven calendar days and 49.48% were responded to within ten calendar days. NYCHA exterminators also have begun plugging holes, using HEPA vacuums to vacuum up roach residuals, sealing cracks and educating residents with fliers about how to keep their homes pest free. By adding these additional duties, exterminators will get to the root cause of an infestation and fix that, which will reduce repeat infestations in the future. Under (c), NYCHA does apply effective pest control methods within seven days 98.33% of the time. In addition, in August 2020, NYCHA updated its pest priority matrix, which our planning units use to schedule appointments with residents. Each pest has a timeline within which an appointment should be scheduled (e.g. 24 hours, 48 hours, 4 days or 10 days). This matrix will allow exterminators to visit, inspect and treat within the timelines laid out above.

In August 2020, NYCHA also launched an enhancement to expedite pest appointments for households that are “pest sensitive” as evidenced by a member of that household having asthma, or another health condition generally recognized as being caused or exacerbated by exposure to pest infestations. If a household has had a DOHMH asthma violation since 2013, reports using a life sustaining device on

their annual review or they have a reasonable accommodation because of a respiratory issue, their pest complaint will be scheduled one priority point quicker on the priority matrix mentioned previously than if they did not have these conditions.

Goal: Targeted Relief for Infestations

Objective: By July 31, 2019, NYCHA will, for any unit that has more than one pest infestation complaint verified by NYCHA staff within 12 months, (a) cause a professional using integrated pest management (IPM) techniques to evaluate the unit and its immediately adjacent units and common areas within 30 days to identify any circumstances specific to that unit that may have contributed to such recurrence (including, but not limited to, unaddressed leaks, proximately located trash, or holes in walls), and (b) address, consistent with IPM principles, any such circumstances within the following 30 days.

Progress: This program was completed in December 2020. NYCHA identified 7,408 primary impacted units (PIU) subject to the targeted pest relief requirement above. NYCHA determined that separating the PIUs into two categories to prioritize the work was the most effective way to treat units with a recurring pest issue. NYCHA split the PIUs as follows: 2,645 units with *open* work orders for pest relief (the “First Priority PIUs”); and 4,763 units with *closed* pest relief work orders (the “Second Priority PIUs”). NYCHA completed inspections and treatments of the First Priority PIUs in January 2020. Inspections and treatments of the Second Priority PIUs were suspended due to COVID-19, but the program re-started in September 2020. NYCHA also completed inspections and treatments of units adjacent to these primary units, if necessary, based on the level of infestation in a primary unit, by the end of 2020.

Goal: Implementation of IPM Practices

Objective: By January 31, 2020, NYCHA will incorporate industry-standard IPM practices, including Northeastern IPM Center (NortheastIPM.org and StopPests.org), Integrated Pest Management – A Guide for Affordable Housing, using the current edition at the time of the pest complaint, as developed under an interagency agreement between HUD and the U.S. Department of Agriculture for their Delivery of IPM Training to PHAs project; and current editions of other professional IPM resources as the Monitor may approve, into building operations in all NYCHA properties.

Progress: At the end of 2020, 77% of property level staff have taken a webinar on IPM practices and scored above 80% on the test. In addition, new hire IPM training was rolled out based on employee title and will be given four times a year. In 2020, NYCHA also completed in-person IPM training for all exterminators. To assist with the IPM rollout, NYCHA has also added supplies to developments and created a digital toolkit that management can refer to for IPM tips. NYCHA has also added several digital tracking mechanisms to work orders so NYCHA is able to see when exterminators use caulking, remove frass, use the HEPA vacuum, and give IPM educational materials to residents. All of these elements are part of an IPM plan that aims to find the root cause of a pest infestation, such as a hole or food source and fix the root cause, instead of relying solely on pesticides. In January 2021, NYCHA launched a new Integrated Pest Management standard procedure across the portfolio that sets new standards for pest management.

Objective: By January 31, 2020, NYCHA will send staff appropriately trained on IPM to respond to any pest complaint.

Progress: NYCHA trained 189 staff members (all extermination staff, selected maintenance staff and supervisory staff) in IPM on September 16, 17, 23, and 24, 2019. There was also a 3-day DOHMH training about rat reduction on September 17, 18 and 19, 2019 for 30 NYCHA exterminators and staff

managing the rat reduction program. As of September 2020, NYCHA also completed in-person IPM training for all exterminators in 2020.

Goal: Daily Inspections and Trash Collection

Objective: By July 31, 2019, NYCHA will, no less than once every 24 hours, inspect the grounds and common areas of each building for cleaning and maintenance needs, including pests and trash, and correct such conditions. In particular, NYCHA will ensure that trash on the grounds or common areas of each NYCHA building is collected and either removed from the premises or stored in a manner that prevents access by pests at least once every 24 hours.

Progress: NYCHA policy mandates that waste, including trash and litter found through inspection, be collected by Caretakers at least once per day or every 24-hours. NYCHA has established a Waste Management Department that will work strategically across other departments and the properties to ensure compliance with this policy. NYCHA has also drafted individual property-level action plans to track each development's compliance with the requirement that waste be collected and then removed or stored every 24 hours. NYCHA's Waste Management Department will also be tasked with conducting all compactor repairs and monitoring conditions at storage facilities. Finally, NYCHA's Capital Projects Division has begun plans to redesign waste yards and invest in other containerization upgrades across the entire portfolio to ensure storage in containers that prevent access to pests.

Goal: Other Pest Obligations

Objective: In addition to meeting the above, and except where otherwise provided in an approved Action Plan, NYCHA will perform the following tasks:

- a) NYCHA will install 8,000 door sweeps on basement doors with gaps by March 31, 2020.
- b) NYCHA will install 50 rat slabs by December 31, 2020.
- c) NYCHA will dedicate 20 full-time exterminator staff to conduct ongoing, comprehensive, preventative maintenance treatments in public spaces for developments within the Rat Mitigation Zone.
- d) NYCHA will install exterior bulk crushers or retrofit exterior compactors with auger bulk crushers at 10 developments by December 31, 2022.

Progress:

- a) In spring 2021, a review of the 8,000 door sweeps NYCHA reported installed in the fall of 2020 showed that 2,903 need additional side clips, better reporting photos and/or full reinstallation. Beginning in July 2021, NYCHA's Pest Control Department began fixing approximately 3,000 of these sweeps. As of August 2021, 5,131 sweeps have been installed with the updated photo or physical fixes.
- b) Due to COVID-19 and physical distancing requirements for indoor unventilated spaces, the rat slab installations will not be completed until late 2021. 17 rat slabs have been installed to date.
- c) To date, Pest Control has hired 20 of the 20 exterminators budgeted to the NRR. Pest Control also hired 14 graduates from the Resident Economic Empowerment & Sustainability (REES) program for exterminators. NYCHA is onboarding these graduates first as seasonal employees and then as technicians with the "City Pest Control Aide" title so they can perform certain pest control services. Upon a year of verified, successful service, these technicians can be promoted to exterminators.
- d) NYCHA has completed the installation of bulk crushers at ten developments. The list of developments includes: Baruch, Bushwick, Butler, Coney Island (Sites 4 & 5), Linden, Smith, Wald, Washington, Williams Plaza, and Woodson. A bulk crusher will be installed at seven

additional developments as part of a comprehensive waste yard redesign project, all to be completed by December 31, 2022.

Annual Inspections

Goal: Conduct Annual Inspections

Objective: NYCHA will conduct annual inspections of developments. To complete its annual inspections, NYCHA will either: (a) inspect each occupied unit each year; or (b) inspect its units pursuant to such other program of annual inspection that is consistent with I-HUD Public Housing Management E-Newsletter, Vol. 3, Issue 1 (January 2012).

Progress: Beginning in 2017, NYCHA established an annual inspection program pursuant to which Maintenance Workers inspect approximately fifty percent (50%) of all units at each development, each year. Since 2018, NYCHA has alternated each year between inspecting units on (i) even numbered floors, and (ii) odd numbered floors at each development to ensure that each unit is inspected at least once during a two-year cycle. Thus, in 2018 NYCHA's Information Technology department ("IT") generated work orders in Maximo, NYCHA's asset management software, for the inspection of units on even numbered floors, and in 2019 NYCHA generated work orders for the inspection of units on odd numbered floors. In 2020, IT generated work orders for the inspection of the units on even numbered floors. After IT generates inspection work orders based on this model, NYCHA's borough offices and property management schedule inspections and deploy Maintenance Workers to conduct the annual inspections. In 2019, approximately 70% of the annual inspections were completed by a Maintenance Worker. Before inspections were suspended in early March 2020 due to COVID-19, approximately 23% of the annual inspections for 2020 were completed by a Maintenance Worker. In 2021, NYCHA will again be required to inspect a sample of units at each project. NYCHA is planning to complete inspections of: (i) the 58,102 units on even floors where an inspection was not completed in 2020 due to the COVID-19 pandemic; and, (ii) the 25,741 units on odd floors where an inspection was not completed in 2019.

Objective: By May 1, 2019, and thereafter, annual inspections will include having the person conducting the inspection perform any minor repairs during the inspection.

Progress: NYCHA's Maintenance Workers closed thousands of repair work orders during the course of annual inspections, as shown by records in Maximo, NYCHA's asset management software. NYCHA also codified this practice, including a list of minor repairs required to be conducted during an annual inspection, in its Standard Procedure for Periodic Apartment Inspections. During calendar year 2021, NYCHA has been training Maintenance Workers on the new Standard Procedure.

Objective: By June 28, 2019, NYCHA will submit an Action Plan to the Monitor for complying with the requirement to conduct annual inspections and perform minor repairs during such inspections. The Action Plan will include procedures for (i) on-site completion of minor repairs during inspections, and (ii) the scheduling of other inspection-identified maintenance deficiencies for subsequent repair.

Progress: The Monitor transmitted an Action Plan for annual inspections, which is fully accessible to all stakeholders via the following link:

https://www1.nyc.gov/assets/nycha/downloads/pdf/Annual_Inspection_Action_Plan_Final_12.9.2020.pdf.

Organizational and Operational Initiatives

Goal: Organizational Changes and Improvements

Objective: Establish three new departments to improve compliance, accountability, and environmental health and safety:

- a) Compliance Department
- b) Environmental Health & Safety
- c) Quality Assurance

Progress: NYCHA appointed a Chief Compliance Officer, an Environmental Health and Safety Officer, and a Quality Assurance Officer in 2019 and 2020. The leadership has developed procedures, hired personnel, and set priorities to carry out the responsibilities required by the Agreement. Incremental progress updates on the development and activities of the three Departments is set forth in the Federal Monitor's Quarterly Reports, available at <https://nychamonitor.com/>.

Objective: The Compliance Department will develop a framework to ensure that all workers will have the necessary certifications to perform their duties.

Progress: In coordination with NYCHA's Learning & Development Department, the Compliance Department continues to monitor and advise Departments on certification requirements, particularly for lead, HUD inspections, and gas qualifications. With respect to lead, which is a requirement of NYCHA's agreement with HUD, as of August 26, 2021, 3,388 (93%) of NYCHA employees in applicable titles took the Renovation, Repair and Painting ("RRP") classroom training and 2,437 (67%) took the RRP onsite training.

As mandated by the HUD Agreement, the Compliance Department is responsible for managing the three-day PHAS UPCS Deceptive Practices training which commenced in October 2019. The training includes scheduling, attendance, test scores, and distribution of plaques and is continuously being tracked by the Compliance Department. Phase 1 Training was focused on Maintenance Workers and Senior Operations staff. 98% of the staff requiring Phase 1 Training had received this training by December 31, 2020. Any staff member who was not trained in this cohort will be folded into the next 3-day training scheduled to start in the Fall 2021. Phase 2 Training for approximately 3,000 other employees (primarily Caretakers) started in February 2021. As of August 1, 2021, a total number of 3,383 Caretakers are required to take the training. As of August 26, 2021, 2,479 or 73.2% of all Caretakers have completed the training.

The Compliance Department, in coordination with the Technical Services Department (formerly known as Maintenance, Repairs, and Skilled Trades Department), is responsible for managing the payment, application, and exam filing for all plumbers required to be gas qualified under local law 150 of 2016. The required exam and certification impacts over 200 NYCHA plumbers. As of August 26, 2021, 116 out of 224 (52%) of plumbers have successfully passed the examination and are gas certified. The remaining staff are in the process of registering for the exam, taking the exam, or waiting on the results from the Department of Buildings.

Section B: NYCHA 2.0 Real Estate Development Activities

Goal: PACT to Preserve

Objective: Establish a 62,000-unit program that will address roughly \$12.8 billion of capital needs over 10 years using HUD Section 8 conversion programs, including RAD.

Progress: Approximately 9,500 units have converted to Section 8 and more than \$1.75 billion in renovations have already been completed or are under construction across New York City. That includes:

- Completion of \$579 million in major upgrades at more than 3,200 apartments in Queens and the Bronx; and
- Approximately \$1.2 billion in major upgrades under construction at approximately 6,300 apartments that are home to more than 13,000 New Yorkers.

PACT Partners have been designated for another 5 transactions that are expected to close in 2021, comprising approximately 6,500 units. An additional 14,000 households are currently in the planning and engagement stage.

Goal: Build to Preserve

Objective: Fund approximately \$2 billion in capital repairs across approximately 10,000 NYCHA apartments using revenue generated from mixed-income developments

Progress: NYCHA selected developers for two “Build to Preserve” sites: Holmes Towers and Wyckoff Gardens. Additionally, NYCHA released an RFP in April 2021 to implement a community-driven preservation and investment strategy at Fulton, Chelsea, Chelsea Addition, and Elliott Houses in the Chelsea neighborhood. The four developments, which include 2,073 apartments across 24 buildings in the Chelsea section of Manhattan, have an estimated total of \$366 million in extensive capital need and repair costs ranging from heating infrastructure to building security improvements. NYCHA anticipates selecting partners by the end of 2021.

Goal: Transfer to Preserve

Objective: Generate \$1 billion for capital repairs through the transfer of unused development rights (“air rights”) to adjacent, privately owned sites.

Progress: NYCHA completed two air rights transfers, one at Ingersoll Houses in Brooklyn and another at Hobbs Court in Manhattan, generating approximately \$27 million in proceeds for capital repairs.

Section C: HireNYCHA

Goal: HireNYCHA

Objective: Train an additional 250 NYCHA residents per year, a 70% increase over current efforts at the NYCHA Resident Training Academy (NRTA).

Progress: Due to COVID-19, the HireNYCHA launch has been delayed. NYCHA expects to launch in fall 2021.

Objective: Improve Section 3 compliance tracking for the new HUD Section 3 rule.

Progress: NYCHA has onboarded a vendor to improve Section 3 compliance tracking with implementation of new software. Implementation is expected to be complete by the end of 2021. NYCHA is revising the Section 3 Standard Procedure to align with the new HUD rule for tracking labor hours. The revised Section 3 Standard Procedure is expected to be finalized in Fall 2021.

Objective: Partner with the NYC Department of Small Business Services.

Progress: NYCHA has a long-standing partnership with NYC Small Business Services (SBS). NYCHA and SBS have partnered together on large scale recruitment events, such as supporting test

and trace and vaccination site employment initiatives. NYCHA and SBS routinely work together to host other local job recruitment events at targeted developments. In 2015, NYCHA, SBS and other partners launched the NYCHA Food Business Pathways program – a 10-week business development program customized for NYCHA residents and Section 8 voucher holders who want to start or grow their own food businesses. As of September 2020, Food Business Pathways has graduated 271 residents and registered 189 businesses. In 2016, NYCHA and SBS launched Childcare Business Pathways – for NYCHA residents who are interested in operating a licensed homebased childcare business from their NYCHA apartment. As of September 2020, Childcare Business Pathways has graduated 99 residents resulting in 39 licensed businesses across 6 cohorts.

In October 2019, NYCHA and SBS launched a specialized Food Business Pathways track for residents in the catering business. The first cohort of Catering Business Pathways graduated in March 2020 with 24 NYCHA resident graduates, 18 of which incorporated their businesses or obtained their EIN tax number. In 2020, NYCHA and SBS continued to work together on alumni events to support Business Pathways graduates during the pandemic. In 2021, NYCHA will launch Construction Business Pathways for NYCHA residents interested in starting or growing a handyperson/construction business. As part of this initiative SBS is committed to coordinating no-cost Site Safety Training for Construction Business Pathways enrollees.

Additionally, NYCHA and SBS have partnered to recruit residents into primer training programs offered by SBS's Industry Partnerships and in 2016 launched a 70-hour academic preparation program to support NYCHA residents who have graduated pre-apprenticeship programs but need further instruction to prepare for the competitive International Brotherhood of Electrical Workers (IBEW) Local 3 aptitude exam. As of August 2021, there have been 5 cohorts (one of which one was funded by a NYCHA contractor) and shorter test prep classes, led by NYCHA, resulting in 38 NYCHA residents passing the Local 3 exam.

Goal: NYCHA-STAT

Objective: Continue holding NYCHA-STAT meetings, a centralized review of key performance indicators and development/department-level management.

Progress: NYCHA Statistics, Trends, and Tracking (STAT) meetings are a priority as part of NYCHA's Transformation Plan. Since January 2021, NYCHA has been hosting monthly virtual NYCHA-STAT meetings in compliance with current COVID-19 guidelines.

Section D: Additional Goals

Goal: Promote Equal Opportunity in Housing

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 (DEO) 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 2020, SPD responded to, or assisted with, 329 reasonable accommodation matters from residents, applicants, Section 8 voucher holders, and/or their respective advocates. In 2020, SPD handled approximately 2,330 matters 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 10 visits to SPD, and SPD provided information to a variety of organizations, including Legal Services, Administration for Children's Services, Adapt Community Network, the New York City Mayor's

Office for People with Disabilities, and many others. Applicants, residents, and others in need of assistance with disability issues may call SPD’s hotline at (212) 306-4652 or TTY at (212) 306-4845. Due to COVID-19 office safety restrictions, SPD operated remotely with video and teleconferencing beginning in March 2020 and continued through the rest of the year.

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 housing discrimination complaints with NYCHA. They are investigated internally to determine if the individual has been the subject of unlawful discrimination and whether 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 SPD.

The DEO conducts internal investigations of complaints of fair housing discrimination by public housing residents and applicants for public housing. In 2020, DEO reviewed 26 fair housing matters and 16 had basis for investigation. DEO closed 35 fair housing complaints with 24 having basis for investigation in 2020. Due to COVID-19 office restrictions, DEO’s Office of Employment & Fair Housing Investigations (“OEFHI”) team operated remotely with video and teleconferencing beginning in March 2020 and continued through the rest of the year.

Complaint Basis	Number of Complaints
⊕ Multi Basis	5
⊕ National Origin	1
⊕ Race	4
⊕ Religion	1
⊕ Sexual Harassment	12
⊕ Sexual Orientation	1
Grand Total	24

In 2020, the SPD conducted zero 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 NYCHA’s website at <https://www1.nyc.gov/site/nycha/about/policies-procedures.page> and in audio format at 212-306-4600. 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 Non-Discrimination Policy; and Sexual Harassment Prevention Policy. These NYCHA policies were last revised in January 6, 2021 and include the provision of reasonable accommodations for applicable protected classifications, including disability and victims of domestic violence, under relevant federal, state, and local laws.

NYCHA’s policy is 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 U.S. 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).

Language Services Unit

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 Limited-English Proficiency “LEP”. NYCHA’s Language Assistance Policy takes reasonable steps to ensure that LEP persons have meaningful access to NYCHA programs and services. In support of this policy, LSU regularly assesses NYCHA’s language assistance needs and monitors NYCHA’s language delivery assistance services in conjunction with its programs and services. LSU also makes recommendations to the Executive Department for modifications to 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. The LSU also manages the Language Bank, which has more than 130 volunteers who speak 34 languages collectively.

During normal operations and since the onset of the COVID-19 pandemic, resident communications have been provided in Spanish, Russian, Chinese Simplified, and Chinese Traditional, which are the most frequently requested languages for translation and interpretation services at NYCHA. In addition, contracted services were executed with an external language vendor to translate essential communications in the following eight other languages: *Arabic, Bengali, French, Haitian Creole, Korean, Polish, Urdu, and Yiddish*.

Key documents are also translated and posted on NYCHA’s website in Spanish, Russian, Chinese Simplified, and Chinese Traditional.

In 2020, LSU handled 139 interpretation requests and 2,285 translations requests comprising of 6,892 pages. This year (as of August 2021), LSU has handled 259 interpretation requests and 1,675 translations requests comprising of 4,774 pages. For telephonic interpretation services, LSU can provide the services directly or transfer the call to the new Language Assistance Hotline for assistance through an external language vendor that provides on demand over-the-phone interpretation services in more than 100 languages.

NYCHA property management staff also utilize the Language Assistance Hotline which continues to improve customer service for LEP residents; reduces wait times for over-the-phone interpretations; improves tracking and reporting for language services; and enhances efficiency in the delivery of language assistance.

MyNYCHA

MyNYCHA in Spanish was launched on the web and as a mobile app in the Fall of 2015. As of December 2020, MyNYCHA app has 105,371 registered users in English and 3,905 registered users in Spanish. In 2020, 750 new users registered to use the app in Spanish. Over 7,134 work tickets were created using the Spanish version of the MyNYCHA app in 2020. This year, as of August 31, 2021, 5,123 work tickets were created using the Spanish version of the app and 267 new Spanish users registered to use the app.

NYCHA Self-Service Portal

In 2019, NYCHA implemented a Google Language Translation & Self-Service Portal Usage Report to track the use of Google Translate on NYCHA’s Self-Service Portal. In 2020, the portal received 12,453 requests for Spanish, 2,908 for Chinese Simplified, 1,161 for Russian and 820 for Chinese Traditional. This year, as of August 31, 2021, the portal has received 4,092 for Spanish, 1,573 for Chinese Simplified, 505 for Russian and 329 for Chinese Traditional.

“Where We Live NYC”

“Where We Live NYC” is a collaborative, City-led process to promote fair housing, confront segregation, and take action to advance opportunity for all. Through this initiative, the City of New York and NYCHA are working with community leaders, residents, and government partners to analyze fair housing issues more thoughtfully and develop innovative goals and strategies to empower more residents to live in thriving neighborhoods. The Where We Live NYC Draft Plan was published in January 2020.

Goal: Violence Against Women Act (VAWA)

Objective: Assist residents who are victims of domestic violence, dating violence, sexual assault, and stalking to obtain an expedited confidential transfer and to enhance their safety.

Progress: From January 1, 2020, through December 31, 2020, the following cases were approved for transfer:

VAWA Victim of Domestic Violence	1,025
VAWA Dating Violence	148
VAWA Sexual Assault (includes Child Sexual Victims)	37
VAWA Stalking	149
Intimidated Victim	436
Intimidated Witness	19
Victim of Traumatic Incident	6
Total:	1,820

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 2022 Draft Annual PHA Plan support and assist New York City's efforts in addressing nine (9) of the City's Priority Needs goals, as outlined in its Consolidated Plan Five –Year Strategic Plan (2021-2025).

- *Priority Need #16 Economic Development - CDBG*
- *Priority Need #22 Public Health and Safety – CDBG*
- *Priority Need #23 Services for the Elderly – CDBG*
- *Priority Need #24 Public Housing: Resident Safety*
- *Priority Need #25 Public Housing: Renovation*
- *Priority Need #29 Housing - Rehabilitation of Existing Rental Units*
- *Priority Need #32 Public Housing: Job Readiness and Employment Opportunities*

- *Priority Need #33 Public Housing: Affordable Housing for Low-Income Families and Seniors*
- *Priority Need #34 Public Housing: Improve Operations and Management*

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.
- NYCHA has transferred the entire NY36R005501-16 (\$692,021) grant for RAD rent boost.
- NYCHA is planning to use the NY36R005501-15 (\$987,856) grant toward a future RAD deal covering 5,792 units for the following locations:
 - NY005010030- Audubon, Bethune, Marshall, Harlem River
 - NY005000020- Williamsburg
 - NY005020950- Linden
 - NY005020460- Boulevard

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.
- NYCHA is planning to use the NY36R005502-15 (\$759,649) grant toward a future RAD deal covering 5,792 units for the following locations:
 - NY005010030- Audubon, Bethune, Marshall, Harlem River
 - NY005000020- Williamsburg
 - NY005020950- Linden
 - NY005020460- Boulevard

At this time, NYCHA is evaluating plans for the NY36R005502-17 (\$234,795) and the remaining portion of the NY36R005502-16 grant (\$131,670).

ATTACHMENT F

Admissions Policy for Deconcentration

HUD regulations (24 CFR Part 903) require a discussion of HUD's Deconcentration Requirement in NYCHA's FY 2022 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 2022 Annual Plan to comply with HUD's requirement.

Although 15 of NYCHA's qualifying 126 consolidated developments fall outside of an Established Income Range ("EIR"), NYCHA is exempt from developing an additional Deconcentration Plan to bring the 15 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, 2021. This database contains household-level data for every occupied unit within NYCHA developments.

Of the 164,509 occupied units²⁰, there are 138,958 units within 126 consolidated developments²¹ 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, 25,551 occupied units were excluded from the analysis. See the Appendix for a list of the individual excluded developments.

²⁰ There are 164,509 public housing households as of January 1, 2021.

²¹ For the purposes of this analysis, there are 126 consolidated developments that have units that are not exempt from the application of the Deconcentration Rule. However, there may be units within these 126 consolidated 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 income²² 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 2021 NYCHA mean gross household income is \$24,925, resulting in a lower EIR limit of \$21,186 and an upper EIR limit of \$28,664. 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 2021 HUD Area Median Income for the New York City HUD FMR Area (HMFA – includes the five boroughs and Putnam County) is \$24,510. However, this is less than 115% of the NYCHA mean gross household income, and therefore, NYCHA’s 2021 upper EIR limit remains at \$28,664.

Table I shows that out of the 126 consolidated NYCHA developments that are not exempt from the application of the Deconcentration Rule, there are 5 developments with 4,360 occupied units with gross mean household incomes below the EIR and 10 developments with 8,447 occupied units with gross mean household incomes above the EIR.

**TABLE I
Summary Table**

Development Category	LOWER INCOME DEVELOPMENTS MEAN INCOMES <\$21,186		HIGHER INCOME DEVELOPMENTS MEAN INCOMES >\$28,664		TOTAL	
	Developments	Occupied Dwelling Units	Developments	Occupied Dwelling Units	Developments	Occupied Dwelling Units
Non-exempt NYCHA Developments	5	4,360	10	8,447	126	138,958

**TABLE II
LOWER INCOME DEVELOPMENTS**

Table II lists the 5 consolidated developments with a mean gross household income of less than 85 percent (\$21,186) of the NYCHA mean of \$24,925.

Development Name	TDS #	Borough	Mean Gross Income	Occupied Dwelling Units
East River	009	Manhattan	\$20,368	1,109
Mill Brook	084	Bronx	\$20,468	1,341
Pennsylvania-Wortman	194	Brooklyn	\$20,617	331
Sedgwick	045	Bronx	\$20,915	776
Webster	141	Bronx	\$20,963	803
Total			\$20,628	4,360

²² 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.

**TABLE III
HIGHER INCOME DEVELOPMENTS**

Table III lists the 10 consolidated developments with a mean gross household income greater than 115 percent (\$28,664) of the NYCHA mean of \$24,925.

Development Name	TDS #	Borough	Mean Gross Income	Occupied Dwelling Units
Building Management Associates (Private-BX 1)	530	Bronx	\$29,782	612
Fulton	136	Manhattan	\$32,970	939
La Guardia	076	Manhattan	\$28,781	1,331
Lafayette	122	Brooklyn	\$30,121	864
Ocean Hill Apartments	162	Brooklyn	\$33,067	357
Park Rock Consolidated	351	Brooklyn	\$30,239	798
Riis	018	Manhattan	\$28,705	1,761
Sack Wern	280	Bronx	\$28,853	808
Stuyvesant Gardens I	221	Brooklyn	\$31,705	325
Wilson	112	Manhattan	\$29,202	652
Total			\$29,906	8,447

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 11 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.²³ 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.

²³ 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
- 131 Saint Nicholas Avenue
- 1471 Watson Avenue
- 154 West 84th Street (Dome Site)
- Bedford-Stuyvesant Rehab
- Belmont-Sutter Area
- Boynton Avenue Rehab
- Bryant Avenue-East 174th Street
- Eagle Avenue-East 163rd Street
- East New York City Line
- Fenimore-Lefferts
- Harrison Avenue Rehab (Group A)
- Hoe Avenue-East 173rd Street
- Lenox Road-Rockaway Parkway
- Longfellow Avenue Rehab
- Lower East Side III
- Lower East Side Rehab (Group 5)
- PSS Grandparent Family Apartments
- Rehab Program (Wise Rehab)
- Rutland Towers
- Stanton Street
- Sterling Place Rehabs (St. Johns-Sterling)
- Teller Avenue-East 166th Street
- West Farms Square Conventional
- WSUR (Site A) 120 West 94th Street

Developments Designated for the Elderly Only

- Baruch Houses Addition
- Bethune Gardens
- Boston Road Plaza
- Bronx River Addition
- Brown
- Cassidy-Lafayette
- Chelsea Addition
- College Avenue-East 165th Street
- Conlon LIHFE Tower
- Corsi Houses
- Glebe Avenue-Westchester Avenue
- Haber
- International Tower
- Kingsborough Extension

- La Guardia Addition
- Leavitt Street-34th Avenue
- Marshall Plaza
- Meltzer Tower
- Middletown Plaza
- Morris Park Senior Citizens Home
- New Lane Area
- Randall Avenue-Balcom Avenue
- Rehab Program (College Point)
- Reid Apartments
- Robbins Plaza
- Shelton House
- Stuyvesant Gardens II
- Thomas Apartments
- Twin Parks East (Site 9)
- Union Avenue-East 163rd Street
- UPACA (Site 5)
- UPACA (Site 6)
- Van Dyke II
- Vandalia Avenue
- West Brighton II
- West Tremont Avenue-Sedgwick Avenue Area
- White
- Woodson

Mixed Finance Developments

- Amsterdam Addition
- Bay View
- Boulevard
- Bushwick
- Castle Hill
- Chelsea
- Drew-Hamilton
- Linden
- Manhattanville
- Marble Hill
- Marlboro
- Rutgers
- Saint Mary's Park
- Samuel (City)
- Stapleton

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 has developed 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 for Community Service and links to other websites where eligible activities 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.
4. Updating the community service procedure; community service forms are now requested, reviewed, generated and digitally stored in NYCHA database system. This allows increased transparency and improved reporting metrics for NYCHA due to the ability to monitor the specific community service hours completed, owed, as well as the different exemptions and credits for residents.
5. Reports have been created that allow NYCHA to monitor resident compliance with community service requirement
6. NYCHA residents now have the option of mailing completed community service forms and applicable supporting documents directly to NYCHA central imaging unit or submitting it to their property management office. Staff will mail to the central imaging unit on their behalf.
7. Property management staff was trained on the updated community service procedure and community service forms. This will enable staff to inform and assist residents with the community service updates.
8. NYCHA will also complete systems enhancements that will allow NYCHA residents the ability to request and submit community service forms via NYCHA self-service portal. This will allow residents to submit and request community service forms at any time.

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 property management

staff. When documentation is required for an exemption all forms must be filled-out and signed and returned to the development property management office.

A. 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 \$21,060 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 \$14,040 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 \$24,570 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 supporting 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”, the resident has to submit Community Service Performance Log or Community Service Requirement Exemption Request form within 30 days of the date of the Status Notice. If NYCHA does not receive Community Service Performance Log or Community Service Requirement Exemption Request within 60 days from the date the forms are sent, the resident will be mailed the Determination of Non-Compliance /Workout Agreement.

If the Determination of Non-Compliance /Workout Agreement is not received within 30 days from it being sent, NYCHA will initiate termination proceedings against the tenant.

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.

NOTICE	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. They can do this by submitting the completed forms to staff at their property management office to be mailed to NYCHA’s central imaging center or the resident can mail the forms directly to NYCHA’s central imaging center. Once the forms have been received by the NYCHA central imaging center, the community service forms will be uploaded to the residents’ account for NYCHA staff to review and process. The resident can submit these forms at any time during the year. The resident must complete the owed hours by the date of their next annual recertification.

Definitions of Community Service and Economic Self-Sufficiency and examples of qualifying activities are:

<i>Community Service</i> is defined 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.	
Examples of where to find Qualifying Community Service Activities	
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: <ul style="list-style-type: none"> ▪ NYC Service – Located on the internet at www.nycservice.org ▪ By calling 3-1-1 the NYC Citizen Service Center ▪ The Volunteer Match database located on the internet at www.volunteermatch.org 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.	
Examples of NYCHA Community Service Activities	
Resident Watch <ul style="list-style-type: none"> ▪ Resident Green Committees (“RGC”) ▪ Attendance at Resident Association meetings ▪ Delegate/Alternate at RAB meetings 	<ul style="list-style-type: none"> ▪ Community Center/Senior Center volunteer ▪ Help at resident sponsored community clean-up days ▪ Attending meetings called by NYCHA

Examples of Non-NYCHA Community Service Activities

Volunteer for local government, community, or faith-based organizations that serve a public benefit

- Food Bank
- Hospital
- Nursing Home/Hospice
- Ambulance service
- Programs providing support to families with hospitalized members
- Parks Department
- Library
- Reading Program
- Parent Teacher Association (“PTA”) meetings

- School
- After School Programs
- Day Care Facility
- Habitat for Humanity
- Boys or Girls Club
- AmeriCorps
- Police Department
- Auxiliary Police
- Youth Mentoring
- Vista
- Court ordered Community Service

Economic Self-Sufficiency is defined 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 *Economic Self-Sufficiency* program can also provide work for its participants.

Examples of Qualifying Economic Self-Sufficiency Activities

- Any REES or RES program ¹
- Work placement
- Apprenticeship
- Any program necessary to prepare a participant for work (including substance abuse or mental health treatment programs)

- Employment counseling
- Basic skills training
- English proficiency
- Workfare
- Financial management
- Household budgeting or management

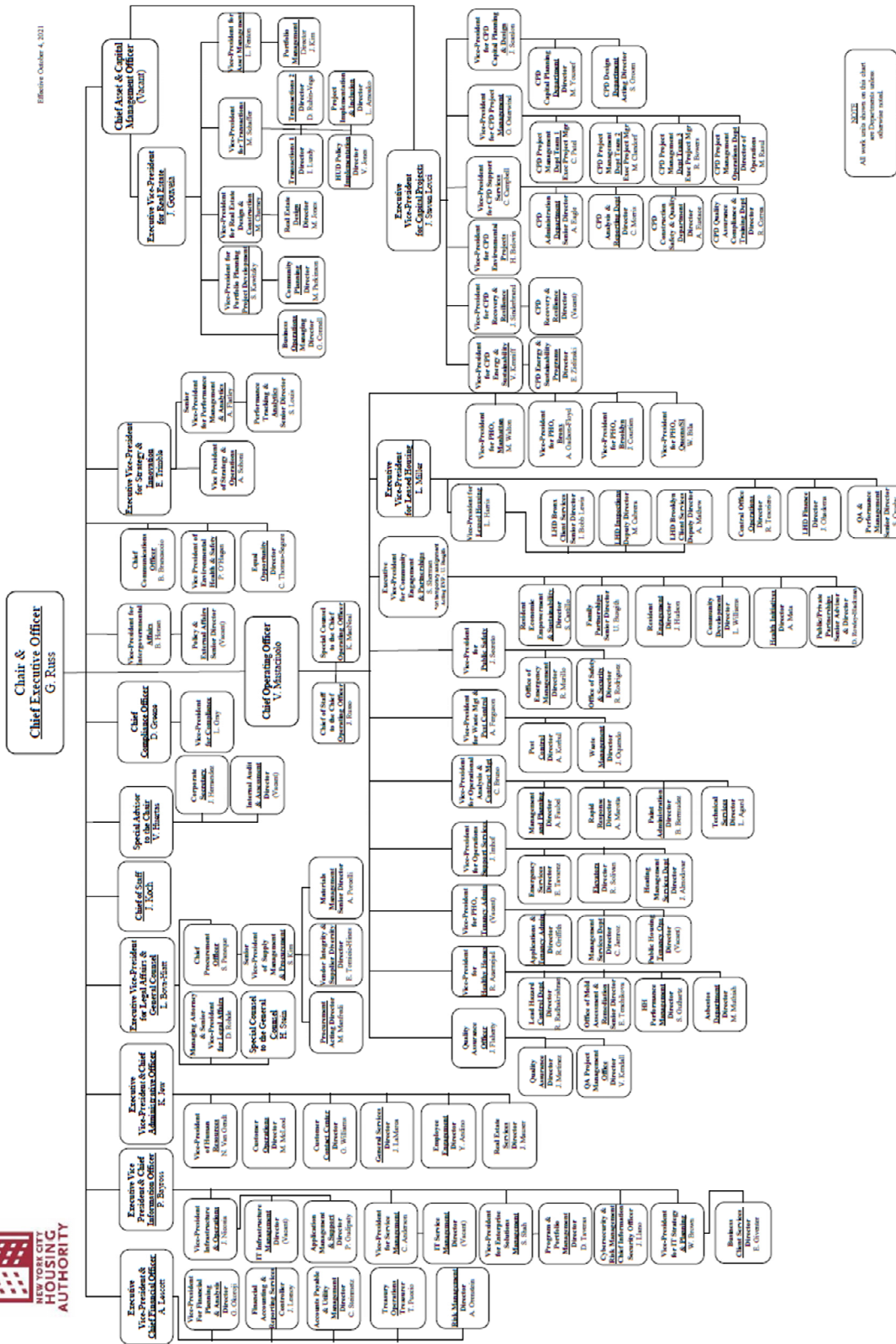
¹ REES is NYCHA’s Resident Economic Empowerment and Sustainability

ATTACHMENT H PHA Management Organizational Chart

NEW YORK CITY HOUSING AUTHORITY ORGANIZATION CHART



Effective October 4, 2021



All work items on this chart are subject to change without notice.

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, 2021, Stanton Street housed 13 families having the following racial/ethnic characteristics. There was a change in the race/ethnic characteristics from last year with White families decreased from 2 to 1 and Hispanic families increased from 8 to 9. There were 3 heads of households reporting having a disability.

<i>White</i>	<i>Black</i>	<i>Hispanic</i>	<i>Other</i>
1	3	9	0

ATTACHMENT J

Smoke Free Housing Statement

The U.S. Department of Housing and Urban Development (HUD) required 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 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.

Partnering with Residents, the NYC Health Department and Other Leaders

NYCHA's areas of focus for the first three years of implementation (2018-2021) have been to strengthen Smoke-Free NYCHA by facilitating dialogue about policy goals, establishing smoking cessation support partnerships, and promoting active and consistent enforcement. In August 2020, NYCHA launched the Smoke-Free NYCHA Liaison program. Smoke-Free NYCHA Liaisons serve as community health workers that can answer questions about the policy, coach residents who want to quit or reduce tobacco use and provide relevant resources to help residents adhere to the policy. NYCHA is also working to assist resident leaders across the City who are interested in working to build support for Smoke-Free NYCHA at their development.

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.

ATTACHMENT K**Public Housing Resident Advisory Board (RAB) Members****RAB DELEGATES/ALTERNATES 2021**

	Delegate Name	Development	District	Delegate/ Alternate
1	Lozano, Lilithe	Parkside	Bronx North	Delegate/CCOP
2	Simmons Gil	E. 180 th St./Monterey	Bronx North	Delegate
3	Hall, Robert	Gun Hill	Bronx North	Delegate
4	Edwards, Maurice	Marble Hill	Bronx North	Delegate
5	Butler, Harvey	Sack Wern	Bronx North	Delegate
6	Lauray, Barbara	Fort Independence	Bronx North	Delegate
7	Jamerson, Princella	Millbrook	Bronx South	Delegate
8	Peterson, Miguel	Teller Avenue	Bronx South	Delegate
9	Henry, Audrey	Findlay Avenue	Bronx South	Delegate
10	Walker, Daniel Barber	Jackson	Bronx South	Delegate/CCOP
11	Topping, Ronald	Adams	Bronx South	Delegate
12	Tull, Gloria	Claremont Parkway	Bronx South	Delegate
13	Primus, Gwendolyn	Webster/Morrisania	Bronx South	Delegate
14	Bowman, Reginald	Seth Low	Brooklyn East	Delegate/CCOP
15	Johnson, Naomi	Howard	Brooklyn East	Delegate
16	Clifton, Rose	Howard Ave Rehab	Brooklyn East	Delegate
17	Green, Desiree	Crown Heights Rehab	Brooklyn East	Delegate
18	Boone, Marie	Tilden	Brooklyn East	Delegate
19	Whitaker, Cynthia	Unity Plaza	Brooklyn East	Delegate
20	Caldwell, Karen	Pink	Brooklyn East	Delegate
21	Marshall, Lillie	Red Hook West	Brooklyn South	Delegate/CCOP
22	Feliciano, Wanda	Unity Tower	Brooklyn South	Delegate
23	Brown, Frances	Red Hook East	Brooklyn South	Delegate
24	Boyce, Sheryl	Bayview	Brooklyn South	Delegate
25	Burgess, Darold	Ingersoll	Brooklyn West	Delegate
26	Harrell, Cassandra	Bed Stuyvesant Rehab	Brooklyn West	Delegate
27	Colon, Naomi	Marcy	Brooklyn West	Delegate
28	Shipman, Lohoma	Bushwick	Brooklyn West	Delegate
29	Bradham, Vernona	Roosevelt	Brooklyn West	Delegate/CCOP
30	Velez, Ethel	Johnson	Manhattan North	Delegate/CCOP
31	Green, Nathaniel	Dyckman	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	Gordon, Felicia	Hernandez	Manhattan South	Delegate
36	Quinones, Carmen	Douglass	Manhattan South	Delegate

37	Morris, Ann Cotton	Woodside	Queens	Delegate/CCOP
38	Anglero, Karen	Latimer Gardens	Queens	Delegate
39	Coger, Claudia	Astoria	Queens	Delegate
40	Wilkins, Carol	Ravenswood	Queens	Delegate
41	Harris, Brenda	Cassidy/Lafayette	Staten Island	Delegate/CCOP
42	Parker, Geraldine	Stapleton	Staten Island	Delegate
43	Butler, Shekina	West Brighton I & II	Staten Island	Delegate
44	Lewis-Clinton, Scherisce	South Beach	Staten Island	Delegate
45	Charles, Brenda	Mariners Harbor	Staten Island	Delegate
46	Brown, Lorraine	334 East 92nd St.	Section 8	Delegate

ATTACHMENT L

Agendas of Meetings Held with NYCHA's Resident Advisory Board (RAB)

March 25, 2021 Agenda

- Roll Call
- Introduction
- RAB Meeting Topic: A Blueprint for Change: Transformation Plan
- Next Steps & Additional Q&A
- Upcoming RAB Meetings and Annual Plan Schedule
- Thank you!

April 8, 2021 Agenda

- Roll Call
- Introduction
- Resident Roundtable
- Transformation Plan Priority Projects
- Upcoming RAB Meetings and Annual Plan Schedule
- Thank you!

April 29, 2021 Agenda

- Roll Call
- Introduction
- PACT Update
- Upcoming RAB Meetings and Annual Plan Schedule
- Thank you!

May 6, 2021 Agenda

- Roll Call
- Introduction
- PACT Update
- Upcoming RAB Meetings and Annual Plan Schedule
- Thank you!

May 13, 2021 Agenda

- Introductions
- Roll Call
- Agreement Focus
- Investment Strategy
- Funding Sources – Federal, State and City
 - State and City – Predefined scope-based allocations
- FY 2021 Proposed Federal Capital
 - Funding scopes
- Comments and Questions

September 23, 2021 Agenda

- Introductions
- Roll Call
- Capital Projects Division
- Real Estate Development Department
- Upcoming Annual Plan Schedule
- Comments and Questions

ATTACHMENT M

Comments from NYCHA's Resident Advisory Board (RAB)

Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures

- Instead of saying “empower residents to improve quality of life” as part of the Transformation Plan, it should be “train residents...”. There are new tenants in NYCHA developments all the time. In the past, new tenants used to receive a handbook that explained the policies and procedures of living in NYCHA. People need to be trained on how to live in their homes, including how/when/where to put their garbage. Will NYCHA be creating a new handbook for tenants?

NYCHA's current resident handbook, “A Home to be Proud Of” is provided to every new resident. There is no current plan to recreate the resident handbook, but we will take the suggestion under advisement for future stages of the Transformation.

- If NYCHA provides a handbook about how to live in NYCHA when new residents sign their lease, they should also have to read and sign that they received and read the handbook. In the lease, they have to be held accountable for throwing out their trash and for being a responsible neighbor. If residents don't follow the rules, they should be subject to eviction. This needs to be spelled out and enforced. How many trainings or disciplinary marks does someone have to receive before they are subject to eviction? If it can't be eviction, are there other incentives that could be put in place to motivate people to maintain their apartments and the development?

NYCHA is working with the Resident Roundtable and CCOP to explore the best methods of lease enforcement that can change problematic behaviors. This collaborative work with resident leaders is under the Transformation effort and will become part of the agency's strategic priorities for the future.

- When an individual or family is transferred from DHS and the shelter system to NYCHA, they are not taught how to live in NYCHA. To change the narrative, NYCHA needs to educate people how to live in NYCHA through the handbook, trainings, or other methods.

Every new resident receives a rental packet that includes the “A Home to be Proud Of” handbook, Highlights of House Rules, and Emergency Preparedness Guide for Apartments.

Operation and Management

- During the initial months of the COVID-19 pandemic, there were cleaning crews that would sanitize the doorknobs, handles, the elevators, the floors, etc. Why has this service been cut back?

While a vendor no longer performs routine sanitizing of frequently touched surfaces at NYCHA developments, daily cleaning of high touch surfaces is now completed by NYCHA Caretakers who also maintain a cleaning log. NYCHA continues to retain the services of the cleaning vendors to perform enhanced cleaning and disinfection in offices or areas that were

occupied by an individual with confirmed or suspected COVID-19 within the last 24 hours. It should also be noted that according to the CDC, the risk of infection from touching a surface is low. The most reliable way to prevent infection from surfaces is to regularly wash hands or use hand sanitizer.

- Most, if not all, of NYCHA employees are part of unions. What does it take to terminate a union employee?

Employees with disciplinary due process rights provided for them under their Collective Bargaining Agreement must be served with formal charges of incompetence and misconduct, answerable by the employee in a hearing presided upon by a trial officer. The trial officer makes a report and recommendations to the NYCHA Disciplinary Panel as to guilt and, if appropriate, penalty. The Disciplinary Panel may adopt or modify the trial officer's recommendations. The burden of proof, by a preponderance of the credible evidence, rests with NYCHA management.

Additionally, many employees also have due process rights pursuant to Civil Service Law Section 75. The procedure is the same, requiring serving the employee with formal charges of incompetence and misconduct.

- NYCHA's training courses should include teaching supervisors how to be fair to all residents and employees, regardless of favoritism or personal relationships. NYCHA needs to teach supervisors what it means to be a leader.

NYCHA has a variety of instructor-led leadership training courses available to NYCHA supervisors, including Conflict Resolution, Coaching for Better Performance, Building Cultural Competence, Exceptional Customer Service, and Supervision 101, among others. NYCHA has a variety of online leadership training courses available to NYCHA staff as well.

- Has the project labor agreement (PLA) been re-signed? What is the current status?

The current project labor agreement (PLA) has been extended until November 30, 2021.

- Will the day-to-day maintenance process (one union sending a plasterer to plaster a hole, another union sending a painter to paint, etc.) be addressed as part of the negotiations in the resigning of the PLA? Why or why not?

In addition to this being a union issue (exclusivity, where applicable), it is also a question about DCAS job specifications. Under the Civil Service Law, an employer is not permitted to assign work that is substantially different from the duties listed in the job specification.

- NYCHA needs to provide concrete answers about how employees will be held accountable. A lot of NYCHA's issues with work orders are the result of poor property management. What are the repercussions for a property manager who continuously fails and fails? Is there going to be some type of punishment for a property manager that doesn't manage the properties? For example, many caretakers do not actually know how to properly clean. Many NYCHA employees are waiting for retirement and are accustomed to not working. How will this be addressed and enforced?

Progressive discipline is recommended to respond to continued issues with performance, with the goal of correcting the behavior. If the behavior remains unchanged after progressive

disciplinary steps, the final step would be for the supervisor to request a General Trial (if the employee has due process rights).

Will property management staff be undergoing any training? It is not acceptable that residents who go to the window of their management office are not able to be given the name of their manager or the name(s) of the staff working in the office.

NYCHA offers an “Exceptional Customer Service” training course, which is available to all NYCHA employees and is required by various NYCHA departments. From January 1, 2019 to September 1, 2021, 453 property management staff have completed this course either in-person or virtually. The course objectives are as follows:

- Define exceptional customer service.*
 - Define your internal and external customers.*
 - List what customers expect from you.*
 - Define accountability using The Oz Principle.*
 - List the three signals of customer service recovery.*
 - List things you should not say to customers.*
 - Describe the importance of closing the customer service loop.*
- How are resident leaders and residents informed when lead-based paint is identified in the public spaces of a building?

The development disclosure, which summarizes the lead-based paint in the common area/community spaces/exterior spaces, is located both in the management office and in the tenant portal.

- At Johnson Houses, the railings in the stairwells in 17 buildings were painted in the past few months. Previously, there was not paint on the railings. Lead-based paint has now been identified in the stairwells, and NYCHA keeps repainting the railings. Can NYCHA just remove the paint so that the railings can be unpainted, and there will no longer be issues with lead? Why does NYCHA keep painting stairwells?

All public spaces (doors, stair halls, and apartment doors) were painted by NYCHA under the Public Space Initiative in July 2021.

NYCHA is conducting remediation (stabilization of painted surfaces) on the handrails to ensure that there are no lead-based paint hazards in the stairwells currently. NYCHA’s Lead Hazard Control Department will review the lead-based paint historical reports and if required, NYCHA’s Lead Hazard Control Department will visit to collect confirmation paint chips to be analyzed for lead-based paint.

- NYCHA needs to address the fact that the lack of enforcement is systemic. People who have been living in NYCHA for generations know that certain rules and regulations are not enforced. How will NYCHA address people who are not willing to make changes and abide by the rules?

NYCHA has rules and regulations and an enforcement mechanism. NYCHA offers the opportunity of a due process hearing to those tenants who breach NYCHA rules. Enforcement of the rules is handled at the property management level and by an administrative hearings division and landlord-tenant division contained within NYCHA’s Law Department. As with the enforcement of any rule violation, the process must start once property management has notice and proof of the rule violation.

- How are residents who do not comply with the garbage rules held accountable? If a resident puts their garbage in front of their building even if another rule is in place, how will they be penalized? What's the degree of accountability?

Breaches of rules regarding the proper disposal of garbage are treated like any other obligations that residents face. There is an existing enforcement mechanism, but NYCHA must first be able to identify residents who do not follow the rules.

- At Johnson Houses, kitchens and bathrooms that have been redone are still experiencing a reoccurrence of mold. What is NYCHA going to do to remove the mold?

Mold can reoccur irrespective of whether building materials (including kitchens and bathrooms) were recently replaced if the root cause of mold is not addressed. For example, if there is moisture penetration through a façade or roof, leaky pipes, a lack of ventilation for moist conditions in the bathroom, that may still cause mold to occur even if other parts of the unit were recently repaired. If a resident has a mold condition in their apartment, it is very important that they report the mold, so a work order is generated.

If you have any questions or concerns about mold inspection work or associated repairs, please contact your Property Management Office. Residents who have already contacted the CCC but still have any concerns or complaints can contact NYCHA's Compliance Department, Environmental Health and Safety Department, or Quality Assurance Unit at 718-707-7771 (select menu option 7) or by visiting on.nyc.gov/Submit-Concern. Residents can also contact the independent, court-appointed Ombudsperson Call Center (OCC) at 888-341-7152 or online at <https://ombnyc.com> if they have concerns about mold, leaks, and any associated repairs. Please do not call the OCC unless you have first contacted NYCHA regarding a mold, excessive moisture, or leak problem and are dissatisfied with NYCHA's performance.

- NYCHA needs to train residents in how to mitigate mold conditions in their apartments.

NYCHA launched a campaign to educate residents on identifying and mitigating mold conditions in their apartments. In efforts to assist NYCHA residents, outreach was targeted at locations identified with the most open mold and leak work orders. Resident Engagement conducted door to door outreach and provided residents with the door hangers that identify tips to alleviate mold once NYCHA has completed the work. An educational booklet is also being shared as a tool to ensure residents understand the process of reporting mold and leaks in a timely manner. The booklet is available here:

https://www1.nyc.gov/assets/nycha/images/content/pages/mold-buster/NYCHA_Mold_Busters_Booklet_Web_English.pdf. The Mold Campaign posters have been posted throughout the common areas in all developments for notifications purposes and reporting.

- Red Hook East has a significant rat problem, as well as many other pests including skunks, possums, and raccoons. The rats are very aggressive with residents and the bait that exterminators have left in the development is not working because the rats are too large to go into the traps. What can be done to address the rat issues at Red Hook East?

NYCHA conducts regular extermination at Red Hook East. There are approximately 60 bait stations set up in construction areas. The NYCHA extermination unit conducted a walkthrough of the site in June 2021 to determine where bait stations were needed. Bait

stations are serviced twice monthly and fenced in areas are cleaned once daily. There have been issues with garbage at the development that have been a major contributor to the rat issues outside of the construction areas. Red Hook East management, along with NYCHA's Capital Projects Department's Waste Management team, arranged for more frequent pickups from the trash compactors with the City of New York Department of Sanitation (DSNY) to alleviate the trash issues on site.

When property management is notified of or sees rodents, including rats, property management staff reach out to NYCHA's Planning Unit and request immediate assistance for treatment by exterminators.

- How are Integrated Pest Management (IPM) strategies being introduced to the residents? Is any resident training taking place? NYCHA should set up IPM training sessions at each development to teach residents how to prevent conditions that are conducive to pests.

Integrated Pest Management is all about getting to the root cause of an issue, whether it's a hole the pest uses to enter the space or open food containers that are luring them there.

When exterminators visit an apartment, they give residents a flyer explaining how residents can keep their home pest free through proper garbage disposal, reporting issues and cleaning habits. The flyer is available to view here:

<https://www1.nyc.gov/assets/nycha/downloads/pdf/how-to-pest-free-en.pdf>. NYCHA has also updated its Pest Control website to educate residents on IPM and pest control at the Authority, available here: <https://www1.nyc.gov/site/nycha/residents/pest-control.page>. NYCHA has also published several articles in the NYCHA Journal about IPM, which are available here: <https://nychajournal.nyc/category/ipm/>

- There is flooding in the backrooms (bedrooms) of the G line in Building 10 at Marble Hill. What follow-up will NYCHA do to ensure residents can be protected from this concern in the future?

The Assistant Property Maintenance Supervisor conducted a visual inspection and determined that a bricklayer needs to waterproof the outside façade. As of September 28, 2021, the Assistant Property Maintenance Supervisor is creating work orders and forwarding them to the planning unit for scheduling.

- Residents should be able to report maintenance issues to their individual development, and each NYCHA development should have their own skilled trades departments. Plumbers should not have to travel all over the city to complete repairs.

As part of NYCHA's Transformation Plan and Executive Summary (available for review here: <https://www1.nyc.gov/site/nycha/residents/blueprint-for-change.page>), NYCHA is currently implementing the Neighborhood Model. The Neighborhood Model changes NYCHA's operating model from a six-borough structure (2 functional boroughs – NextGen Operations & Mixed Finance – and 4 geographical boroughs) to a four-borough structure, with all properties within their geography and Queens and Staten Island together). The Neighborhood Model also breaks down NYCHA's properties further into 30 neighborhoods and each neighborhood is led by a Neighborhood Administrator (NA). The goal of the Neighborhood Model is to allow for a smaller scale of operations, more line of sight by managers to daily conditions at the properties, and more direct accountability for management.

In support of the Neighborhood Model, NYCHA is also planning to decentralize skilled trades, including plumbing, as part of the Work Order Reform project. As part of this project, skilled trades will be assigned to a development, a neighborhood, and a borough depending on the need in that area. The goal is to reduce travel time and increase the efficiency of NYCHA's skilled trades teams.

- There should be monthly or quarterly work performance reports for property management. Resident association leaders should meet with the General Manager or someone from upper management to provide feedback on what is actually going on in the developments.

We agree. As part of the Neighborhood Model, we are implementing regular performance reviews for all management-level operations staff. Resident leaders will have the opportunity to provide feedback and will have access to senior staff to discuss the concerns and needs at their development.

- What type of training is NYCHA staff receiving, particularly property managers and regional asset managers (RAMs)? In particular, do any of these trainings address respect, diversity and customer service? Property managers can be very disrespectful to NYCHA residents who do not speak the same language as them, for example, and this type of issue needs to be addressed. Can members of the RAB attend these trainings as well? How are these new trainings different from trainings that have been held in the past?

RAMs are now called Neighborhood Administrators. NYCHA is currently in the process of updating Customer Service training based on feedback from both staff and soon, residents. NYCHA created the Change Ambassador program to leverage staff input into the Transformation Plan and help engage staff across all parts of the Authority. The Change Ambassadors have taken the training and provided feedback. NYCHA also created the Resident Roundtable to bring residents into the implementation process. We intend to have the Resident Roundtable members attend the training and provide feedback as well. We would be happy to extend the invite to RAB members as well. Our goal is to have a new and improved customer service training that reflects the needs of residents and all NYCHA staff will be expected to complete this training.

Community Service and Self-Sufficiency

- NYCHA residents should also have the opportunity to help sanitize their buildings through employment opportunities. REES should train residents so people can help learn how to take care of where they live.

NYCHA's Office of Resident Economic Empowerment & Sustainability (REES) connects residents to economic opportunity services in the areas of employment and advancement, adult education and job training, financial literacy and asset building and resident business development. Additionally, REES administers the NYCHA Resident Training Academy (NRTA), which is funded by the Robin Hood Foundation and provides employment-linked training and job placement assistance to NYCHA residents in the construction, maintenance, and janitorial fields. Most NRTA graduates secure employment with NYCHA, a NYCHA vendor or a union apprenticeship partners post training. To date, over 3,000 residents have completed the NRTA with nearly 2,700 obtaining employment post-graduation. Through Green City Force, NYCHA residents between the ages of 18 and 24 are performing services

as part of the rollout of the Campaign for a Clean NYCHA initiative and 45 NYCHA residents are participating in Green City Forces' clean energy service learning pre-apprenticeship program. NYCHA has also employed a NYCHA-owned business to rollout a recycling program at Wagner Houses, which can serve as a scalable model for other developments. Separately, NYCHA is a participating agency in the 2021 Mayoral City Cleanup Corp (CCC) initiative, employing over 1,000 additional staff members for the season. To date, more than 45% of CCC hires are also NYCHA residents.

- What is NYCHA's current Section 3 policy? It is a requirement of HUD to have a Section 3 policy in place.

HUD's new rule on Section 3 took effect in November 2020. NYCHA is updating its Section 3 procedures to align with the new rule. NYCHA's revised Section 3 FAQ's can be found here: <https://www1.nyc.gov/assets/nycha/downloads/pdf/section3-faq-2021.pdf>

- Oversight, monitoring and enforcement have always been a problem for NYCHA. NYCHA is required to have a Section 3 policy and plan by HUD, but NYCHA does not currently have one. When NYCHA talks about empowering, engaging, and working with the residents, NYCHA should sponsor residents who have Section 3 businesses and put together a fund that can help with their financing, financial counseling, and learn how to apply for NYCHA contracts. NYCHA cannot engage with residents without implementing a Section 3 plan and policy.

NYCHA has Section 3 procedures, which are being updated to align with HUD's new Section 3 rule. NYCHA's revised Section 3 FAQ's can be found here: <https://www1.nyc.gov/assets/nycha/downloads/pdf/section3-faq-2021.pdf>.

NYCHA's Office of Resident Economic Empowerment & Sustainability (REES) connects residents to resident business development programming via REES partners and the Business Pathways series which to date has prepared nearly 400 residents to start or grow food and childcare businesses. In partnership with the Fund for Public Housing and private philanthropy NYCHA will launch Construction Business Pathways in the third quarter of 2021. Construction Business Pathways will provide NYCHA residents with business education and other entrepreneurship supports to start or grow their handyperson/construction business.

- If NYCHA wants to empower residents to improve their quality of life, that may be addressed through homeownership. Looking at NYCHA's homeownership plan, out of 360,000+ people, only 300 people have purchased FHA homes. What type of homeownership program does NYCHA have in place that would improve the quality of life? NYCHA should offer classes on homeownership to residents. How can residents be informed about being credit worthy, how to achieve that, and how to create a legacy and purchase a home?

NYCHA's Office of Resident Economic Empowerment & Sustainability (REES) coordinates access to home-buying education courses for NYCHA public housing residents and NYCHA Section 8 voucher holders in collaboration with HUD-certified homebuyer education partners and financial institutions. During these sessions, now being hosted virtually, residents have the chance to learn about the home-buying process, how to qualify for a mortgage, and first-time homebuyers grants and programs. A list of upcoming homeownership education

workshops can be found here: <http://opportunitynycha.org/events/categories/homeownership-workshop/>. Residents may also contact REES at 718.289.8100.

- We need to ensure that--at the forum held around resident engagement and the adaptation and incorporation of 964 regulations for PACT—a representative from HUD attends who is well-versed in 24CFR964 regulations.

NYCHA is open to HUD's participation in discussions on establishing tenant participation guiding principles for PACT/ RAD converted properties.

- The RAB should receive a stipend to cover the costs of printing materials for RAB meetings.

RAB members receive a stipend for each meeting they attend to cover RAB related expenses.

- In meetings with the RAB/DCCOP/CCOP, there are generally a lot of people missing due to the fact that presidents are busy with other engagements. How are RAB/DCOP/CCOP members supposed to get all of the information they need in order to distribute it to their district, despite not being able to attend all meetings?

The role of the Resident Advisory Board is to assist and make recommendations regarding the development of the PHA Annual Plan, and any significant amendment or modification to the PHA Annual Plan. Participation on the RAB is voluntary and we will consider asking each RAB member about their capacity to fulfill their role on RAB at the start of each Annual Plan cycle to ensure that members are not overly committed.

- NYCHA should treat RAB members with respect, ensuring their timely receipt of RAB stipends. RAB members attend meetings and give NYCHA the numbers needed in order to submit its Annual Plan to HUD every year. NYCHA has an Accounts Payable Department that handles billions of dollars. RAB members shouldn't have to wait a year to receive stipends and then be cheated when they are received. NYCHA should provide explanation as to why RAB members cannot receive stipends in a timely fashion.

NYCHA endeavors to process and payout stipends within 30 days. Prior to the start of the new RAB cycle, we will examine the current system and make improvements to the process.

- NYCHA needs to involve the unions in more meetings with resident association leaders and NYCHA staff so that they can be more involved in ongoing issues at NYCHA, and NYCHA residents can look to the unions for employment opportunities.

NYCHA maintains an open dialogue with our labor partners for matters relating to NYCHA employees.

- Will all resident leaders be receiving a letter from NYCHA regarding the Memorandum of Understanding (MOU) that was recently signed by NYCHA and the CCOP?

NYCHA and the CCOP jointly will issue a letter/email to NYCHA resident leaders regarding the new Memoranda of Agreement in October 2021.

Safety and Crime Prevention

- Does NYCHA still have NYPD police officers living in NYCHA developments? If so, how many officers currently live in NYCHA?

NYCHA currently has six Resident Police Officers (RPOs).

- NYCHA needs to be focusing more on safety issues at developments. What good is a camera if no one is reviewing the tapes until someone gets hurt? NYCHA needs to be proactive, not reactive. NYCHA should hire security guards because they would be more of a deterrent than cameras. The expense NYCHA would spend on the security guards would result in savings on the back end in replacing doors, repairing vandalism, etc.

NYCHA coordinates with local law enforcement agencies to provide access to CCTV cameras for investigation and identification purposes.

- NYCHA should develop a form for the Resident Leader/Tenant Association President to grade staff (including janitorial and other staff) on a regular basis. When the NYCHA staff person is up for review, the feedback and input from the resident leader should be part of their review. This would encourage the staff member to work harder to develop a positive relationship with the leadership, to seek to understand his or her needs, and to be accountable. This should be formalized so that it can be tracked.

Through our work with the Resident Roundtable, we hope to develop new feedback mechanisms for residents to be able to provide specific feedback on both work performed in their home and general feedback on the property management office. Under current labor agreements, we cannot use any resident feedback as part of any official review, but we expect to use the general feedback to increase accountability.

Disposition/Conversion of Public Housing/Homeownership/RAD/PACT

- NYCHA needs to explain what the PACT acronym stands for and outline the specific ways in which PACT is different from the RAD program.

PACT stands for Permanent Affordability Commitment Together and is NYCHA's program to unlock funding to complete comprehensive repairs, while also ensuring homes remain permanently affordable and residents have the same basic rights as they possess in the public housing program. PACT was developed in response to resident and other stakeholder feedback and has programmatic requirements and developer responsibilities that are unique to NYCHA, including robust resident engagement and strong resident rights; capital improvements that prioritize sustainability and connected communities; responsive social service plans; diversity requirements for Partners and their subcontractors; and comprehensive public oversight after conversion.

Through PACT, developments will be included in the federal Rental Assistance Demonstration (RAD) program. RAD is a HUD initiative that allows NYCHA and other public housing authorities to convert the federal subsidy from traditional public housing to Project-Based Section 8 vouchers. PACT uses RAD to convert the properties and layers in

additional resident protections, public oversight, and Partner requirements to ensure we are responsive to the needs and priorities of residents and other stakeholders.

- The Resident Stability and Retention Guidelines for PACT/RAD sound good on paper and in presentation, but there are discrepancies between what is presented and how things are done in the field. How does NYCHA ensure they actually know what is going on in the field?

NYCHA requires that Partners work to resolve all cases regarding rental arrears before starting a formal proceeding, and to continue to work towards resolution when a case is in housing court. PACT Partners are required to submit monthly reports to NYCHA's Asset Management team to provide updates on all their proactive outreach with households about arrears and holdovers before initiating a legal action. Once a household has been contacted multiple times about their arrears or holdover situation, the PACT Partner can escalate that household into a formal eviction proceeding. Formal eviction proceedings are tracked in a legal proceedings log, and updates to individual cases are made by PACT Partners on a monthly basis, when applicable.

- As NYCHA residents, there are certain assurances in place by the Federal Monitor to ensure lead and mold issues, especially for children under 6, are addressed. What assurances are in place for these issues for developments that have been converted under PACT/RAD? Are developments converted under PACT/RAD under the purview of SDNY?

PACT partners are required to follow applicable local state and federal regulations. For PACT projects, NYCHA will report to the Monitor regarding lead and mold, likely around the same time that construction is substantially completed on the project if not before. Once construction is complete, PACT Partners are required to submit monthly reports to NYCHA's Asset Management team to provide updates on the status of maintenance-related repairs across various categories, including lead and mold.

- The CCOP would like to have a listing of developments that will be converting under PACT/RAD so that district leaders can meet with the appropriate resident leaders and discuss the pros and cons of the PACT/RAD program, as well as participate in negotiation with the potential property managers and/or developers.

NYCHA publishes the full list of properties in the PACT program through an interactive map and a printable list on the PACT website which can be accessed at <https://www1.nyc.gov/site/nycha/about/pact.page>. The list is updated regularly and includes all the properties that have converted and their PACT Partners as well as the properties where residents are learning about PACT and preparing for conversion.

- NYCHA should provide a current list of all of the RAD/PACT developments citywide and an easily readable spreadsheet that shows the name of the development, what stage they are at in the PACT/RAD process, and who their resident leadership/president is, as well as a budget for the project. This spreadsheet should be easily readable. This would allow the RAB/CCOP/DCOP to better track what is going on, and to know what is being referred to during RAB presentations.

NYCHA publishes the full list of properties in the PACT program through an interactive map and a printable list (in spreadsheet format) on the PACT website, which can be accessed at <https://www1.nyc.gov/site/nycha/about/pact.page>. The list is updated regularly and includes

all the properties that have converted and their PACT Partners as well as the properties where residents are learning about PACT and preparing for conversion. The latest physical needs assessment data is included as well and NYCHA is updating the information to also include the total development costs for the converted properties. In terms of the release of resident leadership/president at RAD/PACT developments, NYCHA will consider this request and discuss with the impacted resident leadership and CCOP to explore methods to publicize information concerning resident leadership with the residents of the converted developments.

- If a development will be included in the next round of projects, how will resident leaders be notified? Will they just receive a phone call about their selection?

Resident leaders are notified about their development's selection for the PACT program through a meeting during which NYCHA explains the program and answers questions.

- Has the list of future developments for RAD/PACT been updated? Is Hernandez included in the list of developments?

NYCHA publishes the full list of properties in the PACT program through an interactive map and a printable list on the PACT website, which can be accessed at <https://www1.nyc.gov/site/nycha/about/pact.page>. Hernandez is not currently included in the PACT program.

- Why is Penn-Wortman included on the list of upcoming PACT projects? Penn-Wortman is a new development and should not be included as an upcoming project just because it is near other developments that are in need.

Penn-Wortman was built in 1972 and will be 50 years old next year. The Physical Needs Assessment (PNA) identified over \$47 million in capital needs that need to be addressed at this development. Penn-Wortman is scheduled to be converted through PACT by the end of 2021 with Linden Houses. The selection criteria used for PACT includes a variety of factors, including the level of physical repair needs. NYCHA also considers developments with high needs that are in close proximity to one another.

- If renovations for PACT projects are set to begin in 2023, what is the projected completion date for those PACT projects? When will renovations and upgrades be completed? Is it fair to say that projects just getting underway won't be completed until 2025 or 2030?

PACT Partners are required to complete the full comprehensive scope of work within 3 years of the conversion date.

- As it appears that many renovated PACT/RAD buildings have fabricated cabinets and cheap refrigerators—the RAB would like to see the actual allocations for each PACT/RAD project—the amount allocated per each unit vs. what is actually spent. The RAB would like to see exactly how the money is being spent, not just a blanket number.

NYCHA publicly shares the total repair costs that are being invested in each of the PACT properties. A per-unit cost can be calculated from the information we share; however, we want to remind the RAB that improvements are not just being made within the unit. PACT scopes of work also include rehabilitation to the building's facades, roofs, infrastructure, public spaces, and grounds.

- The RAB would like to know if NYCHA is aware of Clason Point's history, as it is going to be converted under PACT/RAD.

Yes, Clason Point Gardens is the location of a former military barrack and possesses a unique site plan and building character. We are excited about the opportunity to not only rehabilitate the buildings and apartments but also improve public spaces and security across this development.

- Is Linden a former City/State development? How has it been funded in recent years if it doesn't receive federal funding?

Yes, Linden is a former City/State development and is not eligible to receive any direct funding from the federal government, which has stretched NYCHA's operating and capital budgets in ways that take resources away from the public housing portfolio.

- NYCHA needs to provide the template for private developers' PACT/RAD contracts.

NYCHA shares the template PACT legal documents on its website. They can be accessed here: <https://www1.nyc.gov/site/nycha/about/pact/resident-resources.page>.

- Is it NYCHA and HUD's policy to go with lowest bidder for PACT/RAD project? Is this the reason why the work done has not been up to par in renovated/converted developments?

For the PACT program, NYCHA is not required to select the lowest bidder. Proposals are evaluated based upon the applicants' experience and qualifications and the quality of the proposed rehabilitation scope, financial proposal, and resident engagement plan.

Beginning in 2021, resident leaders are invited to help NYCHA select the developers, general contractors, property managers, and social service providers who will be renovating and maintaining their PACT development. Resident leaders have the opportunity to review proposals, understand the breadth of the proposed rehabilitation, interview development teams, and provide feedback before final selections are made.

- The RAB and CCOP representative from Bronx North would like to see the contractual agreements for the first clusters of developments that were converted under PACT/RAD.

NYCHA shares the template PACT legal documents on its website. They can be accessed here: <https://www1.nyc.gov/site/nycha/about/pact/resident-resources.page> The template agreements are used to create the transaction-specific legal agreements, where project-specific information such as project addresses and unit counts is then added for each transaction. The legal documents are subject to HUD approval before the conversion, and many of the documents are on HUD forms that are not subject to modification.

- Sometimes developers need to be supervised, not just trusted to follow the rules and regulations. How are the developers on PACT/RAD projects supervised by NYCHA?

NYCHA remains actively involved in the PACT properties by administering the Section 8 program and through ongoing oversight of the various contractual agreements and associated reporting requirements through NYCHA's Asset Management team. Through this

oversight, NYCHA continues close collaboration with PACT partners to verify that programmatic commitments and contractual requirements are met.

- Who evaluates the PACT/RAD developers already being utilized as a part of NYCHA's PACT/RAD portfolio to see if their programs are working or not?

NYCHA remains actively involved in the PACT properties, as described above.

- NYCHA is refraining from demolishing buildings and is instead conducting renovations with residents in place due to the fact that there is not enough housing stock to house hundreds of residents during the demolition process. However, conducting these renovations with residents in place is dangerous due to drilling into walls and plaster where there could be asbestos or other issues. NYCHA needs to figure out how to relocate people in order to do the correct demolition, even if it means doing one run of a building at a time. If NYCHA doesn't have the ability to relocate residents safely during renovations, then NYCHA needs to be honest with the residents.

PACT renovations are completed in accordance with NYCHA, HUD, EPA, NYC Department of Buildings (DOB), and other applicable laws and regulations, including provisions relating to environmental hazards such as asbestos and lead. Most PACT renovations are completed with residents in place in an effort to minimize disruptions to residents; however, if the scope of the renovation work requires temporary moves, PACT partners make accommodations for residents to stay elsewhere while the work is in progress. PACT partners assist residents with any temporary moves and pay for expenses during the process.

- Johnson Houses had renovations completed on a floor-by-floor basis in the kitchens and bathrooms and later in the hallways twice over the past several decades. When the renovations took place, the dust conditions were extremely dangerous, making residents sick. Residents were not assisted with their health benefits during this time and had to request to be relocated for their own health and safety. How will NYCHA ensure that the renovations that occur at RAD/PACT developments are safe for residents? Will residents be able to be temporarily relocate if the conditions are not safe?

Under the PACT program, if there is hazardous work taking place or if a resident does not feel comfortable at home due to a health concern or disability, PACT partners make furnished hospitality units available within each development. Partners assist residents with any temporary moves and pay certain expenses during the process.

- NYCHA claims to be concerned about resident health and lead safety. Despite this, residents who go through renovations have historically been exposed to dust, rodents, and other concerns and then they have had to fight to be relocated to avoid these hazards. How will this be different under the PACT program?

Please see responses above.

- NYCHA needs to provide a breakdown of how much it would cost to renovate each NYCHA unit by bedroom size, so that the costs of renovations vs. demolition can be compared. If the cost of renovation is above a certain percentage, isn't NYCHA required to demolish it? NYCHA should start telling residents that the reason why NYCHA does not do Section 18 demolition and is renovating in place is because there is no place to temporarily place the residents.

Obsolescence is a threshold, defined by HUD, that the necessary modifications and/or rehabilitation of the building or development is not cost effective. A third-party vendor assesses the condition of NYCHA's buildings and developments and any buildings and developments that are identified as obsolete can go through the Section 18 process with HUD approval. In order to receive Tenant Protection Voucher Section 8 funding for all units within a building or development going through a Section 18 process, NYCHA must prove obsolescence in that building and/or development.

From our engagement with residents to date, we have heard that residents are fearful of demolition and prefer to remain in place while our Partners complete renovations. We will continue to work with residents of the impacted developments to ensure they are meaningfully informed and involved in the decision-making process.

- NYCHA has housing stock that is more than 75 years old, with plaster and piping that's no longer available. NYCHA needs to be honest with residents about repairs and ask residents for solutions and suggestions. NYCHA should look into taking the renovation of a development one building at a time and temporarily relocate residents as needed. Then, once the renovation is completed in one building, they can go back and make renovations in another building.

Thank you for this feedback. NYCHA is continuing to improve its engagement process to collect valuable input from residents about the needs of their developments and their preferred solutions for improving the properties.

- At Fulton/Elliott/Chelsea, a working group was established to determine if the buildings at those developments could be demolished. Are those buildings still scheduled to be demolished? Will any buildings be demolished at NYCHA developments?

Following NYCHA's draft proposal that considered partial demolition to repair and renovate the Chelsea NYCHA developments, a working group assembled to gather community input on the plan to address much-needed capital repairs at the developments. The working group established principles, which were included in a NYCHA-issued Request for Proposals (RFP) this spring, setting parameters for the process and means by which the redevelopment would be undertaken. One principle was that "no existing residential buildings in the NYCHA Chelsea developments will be demolished." A committee that includes NYCHA residents is currently reviewing the responses to the RFP and intends to select a proposal and partner(s) by the end of the year.

Redevelopment through demolition is evaluated on a case-by-case basis and may be required and/or preferred by residents under certain circumstances (e.g., structurally condemned structures). NYCHA is committed to working with residents throughout the development process to ensure they are meaningfully informed and involved in the decision-making process.

- No NYCHA tenant should go through renovations without being relocated.

Thank you for this feedback. We understand that some residents would prefer to be relocated during renovations. We have also heard that other residents prefer to remain in place while our partners complete renovations. As noted above, if there is hazardous work taking place or if a resident does not feel comfortable at home due to a health concern or disability, PACT

partners make furnished hospitality units available within each development. Residents can stay in these apartments while the work is conducted in their unit.

- It is unfair for residents to have to live with mold and other various issues for 5-10 years, while NYCHA gets the money from PACT/RAD conversions immediately.

Through PACT, NYCHA's Partners raise funds to complete repairs through construction financing. Those funds are put to work immediately at the converted properties. PACT Partners are required to complete the full comprehensive scope of work within three years.

NYCHA also prioritizes developments with the highest and most urgent capital needs for inclusion in the PACT program. NYCHA and its PACT partners also must address mold condition as part of its regular maintenance programs. When a NYCHA resident reports a mold complaint to the CCC or using the MYNYCHApp, that report will generate a mold inspection pursuant to NYCHA's Mold Buster process, which resident can read about on NYCHA's website - <https://www1.nyc.gov/site/nycha/residents/mold-busters.page>.

- Why was the RAB not approached by NYCHA about reviewing and finalizing the legal documents for PACT/RAD conversions? NYCHA needs to have residents involved before the legal agreements are signed.

Beginning in 2021, resident leaders are invited to help NYCHA select the developers, general contractors, property managers, and social service providers who will be renovating and maintaining their PACT development. Resident leaders have the opportunity to review proposals, understand the breadth of the proposed rehabilitation, interview development teams, and provide feedback before final selections are made.

NYCHA shares the template PACT legal documents on its website. They can be accessed here: <https://www1.nyc.gov/site/nycha/about/pact/resident-resources.page> The template agreements are used to create the transaction-specific legal agreements, where project-specific information such as project addresses and unit counts is then added for each transaction. The legal documents are subject to HUD approval before the conversion, and many of the documents are on HUD forms that are not subject to modification.

- What is NYCHA doing to improve attendance at meetings at PACT/RAD sites? If fewer than 5 residents are coming to meetings, that is not sufficient. Not all residents can or will use Zoom. Once NYCHA notices a lack of participation, things should be done differently.

We are now hosting monthly PACT information sessions so any resident or member of the community can learn more about PACT and get their questions answered at times that are convenient for them. For health and safety reasons during the COVID-19 pandemic, the majority of our resident meetings are taking place over Zoom and phone conference. We run conference lines in multiple languages and residents can ask their questions during the live Q&A or via the chat function. Since last year, we have already hosted 13 PACT information sessions, with attendance ranging from approximately 80 to 420 participants.

- In terms of PACT/RAD conversions, NYCHA should share information with the CCOP/RAB regarding how many residents have been communicated with (and in what way), including how many residents have attended meetings.

In the last year, we hosted 13 PACT information sessions, with attendance ranging from approximately 80 to 420 participants. We have created new print materials, videos, and web resources to ensure that residents have the latest information about PACT and their development and that they understand their rights and protections, the rehabilitation process, and other program elements. We mail selected materials, including a welcome letter, PACT info sheet and a presentation deck for the first resident meeting, to every household in the development. Materials are available in the primary languages spoken at the development. We also conduct phone-banking to every phone number we have on record, inviting residents to upcoming meetings and answering questions about the PACT program.

- The RAB would like to hear from residents who are a part of PACT, and their concerns of what has and has not worked. This would be a useful tool for the RAB, and would give the RAB more clarity, helping to prevent the same mistakes from being made again.

We think this is a great idea and encourage the RAB to reach out to the Tenant Association leaders of our converted developments to speak with them about the process.

- The RAB would like to meet with resident leaders at developments that have undergone a PACT conversion and have a tour of one of the converted developments.

NYCHA offers tours of the PACT properties where comprehensive repairs are complete and invites residents to speak honestly about their impression of the process and the repairs. As our Partners complete construction at additional sites next year, we will also include tours of those developments.

NYCHA and our Partners, MDG Design + Construction and Wavecrest Management, and members of the Betances resident association hosted a tour of Betances Houses for RAB members on June 16, 2021. Betances is a PACT development that completed construction earlier this year. Approximately 25 resident leaders from the RAB joined the tour. NYCHA is open to hosting additional tours in the future.

- NYCHA should have leaders from developments that have undergone PACT conversions at the RAB. Has NYCHA proposed adding PACT members to the RAB?

It is our understanding that CCOP is working to establish a PACT/RAD committee that would be comprised of residents living at PACT developments. We support these efforts and look forward to engaging further.

- The process that management is using at Boulevard Houses to attain recertification and file information from residents for the PACT conversion is impersonal. Management is putting notices on people's doors, but not mailing residents or calling them by phone. People are not comfortable, as the majority of residents don't know about RAD/PACT and feel like they're being forced into some kind of program they're not aware of. What will NYCHA do to avoid this happening at developments? What NYCHA's Central Office says is happening at PACT/RAD developments is not what is happening, and residents deserve to have more information.

At Boulevard Houses, NYCHA mailed selected materials, including a welcome letter, PACT info sheet and a presentation deck for our intro resident meeting, to every household in the development. We also conducted phone-banking to every phone number we have on record,

inviting residents to upcoming meetings and answering questions about the PACT program. Additionally, we held nine PACT information sessions over Zoom and phone conference so residents could learn more about PACT and get their questions answered. The average attendance was about 70 people at each meeting. For health and safety reasons during the COVID-19 pandemic, the majority of our resident meetings have been taking place remotely rather than in-person.

- When referring to the resident rights when buildings convert under PACT/RAD, NYCHA needs to clarify what “residents have a right to organize” means.

Under PACT, residents continue to have a right to organize and elect a resident organization to represent their interests. A resident organization (RO) is considered “legitimate” by HUD if it has been established by the residents of the property, meets regularly, operates democratically, and is representative of all residents at the property. Additionally, the PACT Property Manager must recognize the RO and allow the RO to conduct activities related to the operation of the resident organization, per HUD’s RAD Notice.

- Parts of CFR 964 are referenced in NYCHA’s PACT/RAD documents. Which parts of CFR 964 are referenced? The RAB would like to go line by line through the documents and the CFR 964 regulations so it is clear which parts are included.

The transaction documents reference CFR 964 in the PACT Principles, which are included in the Control Agreement. The reference is as follows:

“Residents have the right to form a resident organization (RO) to represent all residents in the development, which the developer/property manager (PM) must recognize. If there is a RA (964- compliant and NYCHA-certified) that exists prior to conversion, the RA will be recognized as the RO after conversion. If only part of the development with an RA will convert, the RA will continue to exist, and the converted portion may form an RO. If no RA exists, NYCHA shall encourage the residents to form one prior to conversion. If, upon conversion, there is no RO, the PM should encourage residents to form one and support them in doing so. Accordingly, under PACT, residents continue have a right to organize (see above for more details) and receive tenant participation funds (\$25 per unit per year).”

- CFR 964 mentions the resident council. Is tenant participation part of the PACT/RAD requirements?

Yes. HUD has explained this in the RAD Notice.

- How will the CFR 964 regulations be included in all PACT/RAD contracts? Can NYCHA work with CCOP to finalize the revised contracts?

As noted above, contract documents do reference CFR 964 regulations, but NYCHA is interested in understanding residents’ concerns and discussing further with the RAB how CFR 964 regulations can be more explicitly incorporated into PACT contracts.

- How will residents review materials about PACT/RAD conversions if they are not able to access websites?

We mail materials about PACT, including a welcome letter, PACT info sheet and a presentation deck for most resident meetings, to every household in the development. We also conduct phone-banking to every phone number we have on record, inviting residents to upcoming meetings and answering questions about the PACT program. Additionally, we hold PACT information sessions so residents can learn more about PACT and get their questions answered.

- NYCHA always showcases a few completed PACT developments as poster children for the program. However, developments currently in the pipeline and going through the process now are the ones experiencing the impact of the PACT/RAD program. When NYCHA has residents speak who have gone through the PACT/RAD conversion process, they always invite residents that are pro-PACT/RAD and happy with the program. NYCHA should have residents speak who are both for and against the PACT/RAD program.

NYCHA offers tours of the PACT properties where comprehensive repairs are complete and invites residents to speak honestly about their impression of the process and the repairs. As our Partners complete construction at additional sites next year, we will also include tours of those developments.

- NYCHA needs to talk directly to the residents and resident leaders at converted developments. NYCHA makes repairs at PACT/RAD developments and three weeks later, the leaks return.

NYCHA's development partners make the repairs at PACT/RAD developments. NYCHA and our key financing partner, the New York City Housing Development Corporation (HDC), both monitor construction throughout the rehabilitation process to ensure our partners are completing the full extent of the PACT scope of work. NYCHA's Asset Management team also monitors the maintenance of the properties during and after construction to ensure that our partners are addressing underlying issues safely and responsively. Recently, NYCHA established a Post-Conversion Unit that will meet regularly with the Tenant Association leaders of converted developments to speak directly with residents about ongoing issues

- The CCOP needs to be better informed about the potential partnerships occurring at PACT/RAD sites in each of their districts, as well as potential sites for upcoming conversions. The CCOP needs to be informed so that they can disseminate information to the developments and their resident leaders.

NYCHA publishes the full list of properties in the PACT program through an interactive map and a printable list on the PACT website which can be accessed here:

<https://www1.nyc.gov/site/nycha/about/pact.page>. The list is updated regularly and includes all the properties that have converted and their PACT Partners as well as the properties where residents are learning about PACT and preparing for conversion. NYCHA's Resident Engagement Department meets with the CCOP and RAB to discuss upcoming conversations as part of the Annual Plan process each year, and we are committed to continuing to do so in the future.

- When do resident leaders go from being under the jurisdiction of NYCHA to the PACT project? We need to ensure that resident leaders continue to be included as a part of the decision-making process after the conversion.

All PACT properties continue to have NYCHA oversight even after conversion to PACT. Under PACT, residents continue have a right to organize (see above for more details) and the PACT Property Manager must recognize the RO and allow the RO to conduct activities related to the operation of the resident organization, per HUD's RAD Notice.

- What will the relationship of resident leaders to the city-wide resident leadership organizations (CCOP) be after PACT/RAD conversion? Going forward, there should be language in the Annual Plan and in the contract that that relationship should continue so that resident leaders' rights and rules and regulations are protected. There should be a resident/developer/NYCHA agreement that makes sure that the protections under our current structure continues.

Under PACT, residents continue have a right to organize and elect a resident organization (RO) to represent their interests. The PACT Property Manager must recognize the RO and allow the RO to conduct activities related to the operation of the resident organization, per HUD's RAD Notice.

We are open to recommendations regarding city-wide resident leadership organizations and will share those suggestions with the Citywide Council of Presidents (CCOP). The CCOP is currently finalizing their by-laws which may include opportunities to integrate PACT residents into their structure. Please email annualplancomments@nycha.nyc.gov with any recommendations.

- The RAB would like to be able to make recommendations about who is a part of the subcommittees for PACT/RAD Advisory Board.

It is our understanding that CCOP is working to establish a PACT/RAD committee that would be comprised of residents living at PACT developments. We support these efforts and look forward to engaging further.

- Will residents be able to provide input about which development partners are selected for PACT/RAD conversions?

Resident leaders are now invited to help NYCHA select the developers, general contractors, property managers, and social service providers who will be renovating and maintaining their PACT development. Resident leaders have the opportunity to review proposals, understand the breadth of the proposed rehabilitation, interview development teams, and provide feedback before final selections are made. This is a step we have never taken until this year, and we are excited to bring residents into this critical element of the program.

- Will tenants living in developments that have already undergone a PACT conversion be able to go back and reevaluate the program partner selection process at their development? If NYCHA is now allowing resident leaders to help NYCHA select PACT partners, leaders at developments that were not consulted before should be able to review the selection process.

NYCHA's Asset Management team monitors the performance of the properties after conversion to ensure that our PACT Partners are fulfilling their obligations and effectively managing the properties. We also established a Post-Conversion Unit, which will meet regularly with the Tenant Association leaders of converted developments to speak directly

with residents about any operational and management issues at the properties. If there are significant issues with the day-to-day operation of the PACT development, NYCHA retains the right to remove the PACT developer/property manager.

- NYCHA should provide a list of the first developments that resident leaders will be able to help NYCHA select the PACT partners for.

Going forward, resident leaders will participate in the selection of PACT Partners. Most recently, residents leaders of Edenwald, Frederick Samuel Apartments, and the Reid Apartments & Park Rock Consolidation (104-14 Tapscott Street, Fenimore-Lefferts, 36 Lenox Road-Rockaway Parkway, 74 Ralph Avenue Rehab, Reid Apartments, Rutland Towers, 61 Sutter Avenue-Union Street, 100 Tapscott Rehab) participated in the evaluation of proposals for the PACT Round 9 Request for Expressions of Interest (RFEI). Resident leaders of Chelsea, Chelsea Addition, Elliott, and Fulton are currently participating in the evaluation of proposals for their developments.

- While involving residents in the process of selecting development partners at PACT/RAD sites is excellent, this may cause a conflict within the developments. Residents can have contentious relationships with their TA leaders. How will NYCHA handle the fact that being a part of these conversations may heighten conflicts between resident leaders and residents?

NYCHA recognizes the tenant associations as democratically elected organizations and therefore works with these leaders as resident representatives of the properties. We understand that some residents may have contentious relationships with their TA leaders and we also host meetings where we invite the entire resident body, so all residents have the opportunity to express their concerns and priorities for their development.

- How are resident leaders expected to sign a non-disclosure agreement in order to participate in the process of selecting PACT partners, when they must also share information with residents?

Resident leaders who participate in the developer selection process must keep information about the proposals confidential in order to ensure the integrity and fairness of the procurement process. They are not permitted to share confidential information with anyone who is not on the resident review committee. Resident leaders who participate on the review committee are expected to represent the interests of their community.

- If NYCHA intends to have a partnership with the residents, it must start with respect and trust. While residents must sign confidentiality and conflict of interest agreements in order to participate in the PACT partner selection process, are NYCHA staff required to do the same? Separating staff from the residents is not a good sign of partnership. Instead, NYCHA could create confidentiality and conflict of interest agreements when it comes to the financials and/or for residents who may have their own interests. However, using a broad brush and say all the residents must sign is unfair. NYCHA staff should also be included in this requirement, especially if NYCHA wants a true partnership.

NYCHA employees are subject to the ethics rules contained in Chapter 68 of the NYC Charter, as well as NYCHA's Conflicts of Interest guidelines. Under these standards, NYCHA employees are prohibited from, among other things, engaging in activities that create a conflict of interest, such as having a financial interest in a NYCHA transaction.

Employees must also adhere to the HR Manual, which, among other things, prohibits conflicts of interest and also prohibits employees from disclosing confidential NYCHA or New York City information or using it for any non-New York City or non-NYCHA purpose.

- If there is no penalty for residents who go against the non-disclosure agreement when working with NYCHA to select PACT partners, why have the restriction of having to sign the non-disclosure agreement?

It is important that resident leaders on the review committees understand the importance of confidentiality for the integrity of the competitive procurement process, and in that spirit, we are requesting cooperation to keep the information and discussions confidential during the process. If a resident is found to have violated the terms of the non-disclosure agreement, they would be removed from the review committee.

- It is crucial for both RAB/CCOP members, as well as residents, to know who is investigating PACT/RAD developer partners, as well as how these partners are being selected, and the potential partners' backgrounds. RAB/CCOP members and residents want to know who the potential development partners are, where they come from. They should be allowed to speak to residents in developments which have already been converted as a part of PACT/RAD. RAB/CCOP members and residents should be able to know development partners' pros and cons, which is only fair as not everyone wants to go into privatization.

For the PACT program, proposals are evaluated based upon the applicants' experience and qualifications and the quality of the proposed rehabilitation scope, financial proposal, and resident engagement plan.

Beginning in 2021, resident leaders are now invited to help NYCHA select the developers, general contractors, property managers, and social service providers who will be renovating and maintaining their PACT development. Resident leaders have the opportunity to review proposals, understand the breadth of the proposed rehabilitation, interview development teams, and provide feedback before final selections are made.

- As residents will now be involved in the selection process for development partners for PACT/RAD, if residents are adamantly opposed to a partner selected by NYCHA, will NYCHA honor residents' wishes and change their decision?

Resident feedback is a critical component of the review process and will be strongly considered before any final decisions are made.

- What are the alternatives for NYCHA residents to receive legal counsel other than Legal Aid when seeking legal counsel for PACT/RAD lease signings? NYCHA and Legal Aid have a nefarious relationship in the eyes of some NYCHA residents, and Legal Aid is supportive of PACT/RAD.

The Legal Aid Society is a highly respected legal services organization that has advocated for individuals and families in NYC across a variety of matters, including tenants' rights, for more than a century. However, we understand that residents might prefer alternative counsel, so we are making resources available to support residents during the planning stages. We recently announced the creation of an exciting new initiative, called the Resident Planning

Fund, to provide residents with free technical assistance by trusted, third-party providers. As part of this new program, residents will be allocated a pool of funding that they can use at their discretion, including but not limited to a legal consultant. We are currently working on the program design and look forward to getting it up and running later this year.

- Is the Program Administrator an outside group who will help resident leaders go through the process of the PACT Program?

The Program Administrator for the Resident Planning Fund (RPF) was recently selected this summer and is a consultant team comprised of Public Works Partners, Public Policy Lab, LISC NYC, and Pratt Center. We are currently working with them on the program design and look forward to getting it up and running later this year. See above response for more details about the RPF.

- Not all developments need or want a Program Administrator for PACT/RAD projects. Residents are smart enough and have the skills to do this on our own and will ask for help if they need it. Will developments have to work with the Program Administrator?

Residents who want to access the Resident Planning Fund's pool of funding for technical assistance will need to work with the Program Administrator.

- The RAB would like to request a meeting with NYCHA's new Real Estate Development Department Program Administrator.

The Program Administrator for the Resident Planning Fund (RPF) was recently selected this summer and is currently developing the program design. In advance of the rollout later this year, NYCHA can arrange for a briefing of the RPF with the RAB and the Program Administrator.

- In the discussion around the Resident Planning Fund, there is no mention of Section 3 compliance. Which PACT/RAD developments fall under Section 3 Compliance? NYCHA needs to get a commitment from PACT partners that they will comply with Section 3, especially in terms of supporting Section 3 Contractors and resident-owned businesses. As a part of Section 3, NYCHA should train residents in bookkeeping and other skills so that they can run their own businesses and then hire other public housing residents to truly empower the residents.

All PACT projects are subject to Section 3 requirements. The Resident Planning Fund does not have any impact on the Partners' obligations to comply with Section 3. We will consider your suggestions about resident training. Currently, NYCHA's Office of Resident Economic Empowerment & Sustainability (REES) connects residents to economic opportunity services in the areas of employment and advancement, adult education and job training, financial literacy and asset building and resident business development. More information about REES is available here: <http://opportunitynycha.org/>

- Where are the Resident Planning Funds derived from?

Funding for this initiative is being provided by NYCHA.

- Are the Resident Planning Funds separate from regular TPA funds? How much funding is given per development?

Yes, the Resident Planning Funds are separate from Tenant Participation Activity (TPA) funds. The amount of funding per project is still being determined.

- How is the Resident Planning Funding allocated? Is it according to the number of units?

This is still being determined, but yes, the size of the development is expected to be a key factor.

- Will residents be able to receive funding from the Resident Planning Fund? What are some examples of the way the funding can be utilized? Are there any limitations?

As part of the Resident Planning Fund, residents will be allocated a pool of funding that they can use at their discretion. For example, residents could hire a local community-based organization to serve as an independent advisor; a tenant advocate to mediate and resolve tenancy issues; or an urban design consultant to help craft a community vision for public spaces – just to name a few ideas. It may be possible for residents to receive funding in exchange for providing these types of services.

- Is NYCHA using the PACT Resident Planning Fund as a substitute for Section 3?

No, the Resident Planning Fund does not have any impact on the Partners' obligations to comply with Section 3.

- At Twin Parks West, the tenant participation funds were pocketed by the developers and were not given to resident leaders. NYCHA needs to provide financial disclosure information for the tenant participation funds at all PACT/RAD developments so the RAB can see if the tenant associations are receiving their funding from the developers.

Currently, there is not an official Tenant Association at Twin Parks West. NYCHA's PACT Partners are currently holding all TPA funds in an escrow account and will distribute to the Tenant Association once a new duly elected board is voted in by the residents of Twin Parks West.

- Would NYCHA ever approve a PACT/RAD developer partner's plan to terminate its NYCHA waiting list after a set period of time? Is there a clause in PACT/RAD developers' contracts that they may not terminate the NYCHA waiting list?

NYCHA manages the site-based waiting list for PACT. Our Partners have no role in the administration of the waitlist.

- At Campos Plaza, why was the provision included that allows the waiting list to be terminated? NYCHA should speak with outside counsel regarding Campos Plaza 1 and the developer's plan to terminate the NYCHA waiting list after 25 years.

Campos Plaza I was a former Project-Based Section 8 development and not public housing (Section 9). On December 22, 2014 NYCHA contributed its six Project-Based Section 8 developments (Bronxchester, Saratoga Square, Campos Plaza I, Milbank-Frawley, East 4th

Street and East 120th Street Rehabs) to a new joint venture entity, Triborough Preservation LLC, that includes NYCHA along with L&M Development, Preservation Partners LLC and PDP, LLC, in order to secure funding to complete the 100% rehabilitation and improvement of the 875 dwelling units within the six sites. In 2015, due to the changes in the ownership and management of these properties, apartment vacancies at these developments were to be filled from the Triborough Preservation Waiting List. Applicants for these developments were contacted in May 2015 and were provided the option to either stay on both waiting lists (NYCHA or Triborough) or be removed.

- NYCHA should share the images of the tour at Betances, a development recently converted under PACT/RAD, with resident leaders so that the images can be shared with their residents.

Images of the June 2021 tour at Betances were shared with all members of the RAB following the September 23, 2021 RAB meeting.

- NYCHA should schedule additional tours of converted developments for resident leaders and propose several dates so that resident leaders can choose the date that best accommodates their schedule.

Given the interest that resident leaders have expressed in visiting the converted PACT developments, we are scheduling additional tours and will share the dates with the members of the RAB. NYCHA has also scheduled tours of converted sites for all of our TA leaders currently in the PACT planning process. Each TA leader can invite up to 40 residents to join them on the tour.

- NYCHA should conduct a survey following tours with resident leaders at PACT/RAD sites in order to collect feedback about their visits.

We agree and we implemented this suggestion right away. In addition to collecting feedback from resident leaders about their tours through one-on-one meetings, we are also distributing surveys for all tour participants to complete at the end of their tour. Participants can complete them anonymously, but if they would like direct follow up, there is a spot for them to share contact details. NYCHA can share survey responses in future RAB meetings.

- NYCHA's Real Estate Development department should prepare design storyboards with samples of materials including tiles, finishes, and flooring that is above builder's grade at a reasonable cost and give resident leaders the opportunity to select which materials they would like to receive in their units at that development.

We encourage our PACT Partners to engage residents as they are selecting the finishes that will be used as part of the PACT rehabilitation scope.

- NYCHA should buy vacant hotels and/or motels and temporarily relocate residents, one building at a time, when repairs are being completed. When residents return to their units, they should have the opportunity to choose if they continue renting, or if they buy their unit.

From our engagement with residents to date, we have heard that many residents prefer to remain in place while our Partners complete renovations. Our PACT Partners are required to provide tenant protection plans and hospitality units to accommodate residents who do not feel comfortable at home while work is taking place. We will continue to work with residents of the impacted developments to ensure they are meaningfully informed and involved in the decision-making process.

At this time, we are not able to provide homeownership opportunities at PACT developments; however, NYCHA does offer affordable homeownership opportunities at other properties.

Capital Improvements

- NYCHA needs to provide the RAB and CCOP a listing of all Capital Projects allocations to developments. NYCHA should provide some information on what allocations and projects are going to happen within the year, in particular.

NYCHA provided the RAB and CCOP with this listing at the September 23, 2021 RAB meeting.

- NYCHA should include resident leaders during walk throughs when the Physical Needs Assessments are being conducted. How does NYCHA's Capital Projects Department involve resident leaders when looking at problems and making decisions about which repairs need to be made in each development? NYCHA and Capital Projects need to consult residents and resident leaders when making needs assessments. Although the experts do the best they can to assess the issues buildings face, residents know what is occurring in their buildings and apartments better than anyone else. No one knows those nuances better than residents.

In the previous Physical Needs Assessment (PNA) in 2017, the inspection teams interviewed NYCHA superintendents, property managers, and other maintenance workers who were on-site. The inspection teams walked the development's grounds with the development's staff and documented any conditions they came across. The refresh of the PNA that is expected to start in 2022 will include similar site visits and visual inspections at approximately 10% of NYCHA's developments. As part of this effort, the inspection teams will also invite the Tenant Association leaders to these on-site interviews and will work with the Tenant Association leaders and relevant NYCHA staff to seek input from residents in these developments through resident surveys or other engagement methods. The information gained through the assessment will be utilized to update the physical needs estimates for these as well as other NYCHA developments.

- NYCHA has a significant amount of money allocated for various needs and improvements at different developments. NYCHA needs to explain what the assessment process is for how those funds are allocated.

The funding allocations to the various capital projects are based on data captured through the Physical Needs Assessment process and operational data. This includes but is not limited to: age of building components, physical condition, lead testing results, heating and elevator outages, and availability of parts. The Capital Projects Division within NYCHA applies a logical building sequence when planning work to protect and sustain investments made within developments. This sequence starts with sealing the building envelope (roofs and masonry work) and then focuses on projects involving building systems, interior renovations and grounds.

- Is the funding for a development's grounds, which are often allocated by local elected officials, reflected somewhere in the Capital Projects plan?

The current City 5-Year plan contains 76 grounds projects, including playgrounds.

- Are NYCHA’s Weatherization and Energy initiatives, which make changes such as to lighting, water flow, roofs, refrigerators, rolling out to all NYCHA developments, or only some?

NYCHA uses the State Weatherization Assistance Program (WAP) for its scattered site portfolio, which can include measures such as lighting upgrades, low flow water fixtures, window replacements, boiler replacements and ventilation improvements. NYCHA uses Energy Performance Contracts (EPC) at campus developments for energy improvements.

- NYCHA should provide an overall accounting of how the funds received from Hurricane Sandy have been spent, including what was spent and how it was spent. This information should also include how many Section 3 resident-owned businesses have received some of that money.

The following is the breakdown of all funding to be received by the NYCHA Recovery and Resilience Team:

<i>Funding Source</i>	<i>Funding</i>
<i>Community Development Block Grant - Disaster Recovery (CDBG-DR)</i>	<i>\$317M</i>
<i>FEMA 428: Public Assistance Alternative Procedures (PAAP)</i>	<i>\$2.401B</i>
<i>FEMA - At Cost</i>	<i>\$95M</i>
<i>Hazard Mitigation Grant Program (HMGP)</i>	<i>\$49.5M</i>
<i>Insurance</i>	<i>\$456M</i>
<i>Totals</i>	<i>\$3.32B</i>

The following is the breakdown of expenditures by major category done by the Recovery and Resilience Team:

<i>Contract Category</i>	<i>Amount Spent</i>
<i>Construction Management</i>	<i>\$157,765,242</i>
<i>Construction</i>	<i>\$1,607,463,291</i>
<i>Debris Removal</i>	<i>\$14,627,862</i>
<i>Design</i>	<i>\$100,849,281</i>
<i>Emergency</i>	<i>\$208,849,423</i>
<i>Other</i>	<i>\$28,242,931</i>
<i>Project Management Office</i>	<i>\$137,622,024</i>
<i>Totals</i>	<i>\$2,255,420,053</i>

As of September 2021, projects managed by the Recovery and Resilience Department have hired 1,005 persons who fit into Section 3 categories. Under this program, HUD has funded fifteen classes of pre-apprenticeship training with 220 graduates.

Please see NYCHA's website for more information on the Sandy Recovery and Progress - <https://www1.nyc.gov/site/nycha/about/recovery-resiliency.page>.

- Are NYCHA and the Capital Projects Department considering following Alexandria Ocasio Cortez's Green New Deal for Public Housing? Will NYCHA be working with her to implement some of the ideas that would benefit public housing residents and the community? NYCHA residents should have input on whether or not NYCHA and Capital Projects follows the Green New Deal for Public Housing, as well as how they go about participating in it.

NYCHA works closely with Congresswoman Ocasio-Cortez's office and will continue to work with the Congresswoman and the delegation on plans for more sustainable and greener infrastructure. NYCHA is a strong supporter of the Green New Deal for Public Housing. In the fall 2021 NYCHA will be releasing its updated Sustainability Agenda and a Climate Adaptation Plans, which outline NYCHA's approach to reducing greenhouse gas (GHG) emissions while using an ethical and inclusive model to execute projects and engage residents. By designing sustainability and resiliency into its buildings and communities, NYCHA is ensuring that New York City will have an affordable housing stock for the next generation. These policy documents included a robust stakeholder engagement process to educate residents about the threats of climate change and to engage them in the development of solutions. NYCHA is putting workforce development and green jobs at the forefront of its planning, with the expansion of resident hiring through its Community Shared Solar program and Green City Force youth programs, support for resident-led businesses and the development of a Clean Energy Academy to advance resident hiring for careers in the green economy.

- Gun Hill is currently only slated to receive new fire alarms. What is the process for a development to receive capital funding? If a resident leader feels that his/her development has been wrongly omitted from the list of developments that will receive capital repairs, or if specific repairs have been omitted from their development that are needed, what steps can he/she take to get their development and/or specific repairs on the list for planned capital spending?

Gun Hill is in the City Capital Plan and will receive roof replacements for all buildings under the Mayoral Roof Program. As of September 2021, the Design Certificate to Process (CP) is currently under review by NYC's Office of Management and Budget (OMB). Once the CP is approved, NYCHA will start the design and construction of these roofs.

- What is the most up-to-date information for roof repairs at Gun Hill and where the allocated funds are coming from to make those repairs?

As of September 2021, roofs at Gun Hill are currently in the planning phase and construction for six roofs is slated to begin in February 2023. These roofs are a part of the Mayor's roofing initiative and will receive funding from the Mayor's office.

- Will the contracts for new roofs at Gun Hill include a lifetime warranty? After roof repairs at other developments, leaks and other issues continued even after roof replacement. For this reason, a warranty is absolutely necessary for these types of repairs.

The contracts for the new roofs at Gun Hill will include warranties. Roof warranties generally last for 30 years after the completion of the roof replacement.

- Monterey had been allocated funding to get a new backyard, including a play-area, backyard, and benches. In the presentation given by Capital Projects on 5/13/21 to the RAB, this was not listed in the roll-out. This project had been delayed due to COVID-19. Can Capital Projects explain the status of this project?

As of September 2021, this project is currently in the design phase. Construction is expected to begin in August 2022.

- Resident leaders report that funding allocated from City Council members and local elected officials has been redirected without notification as to where or why this was done. NYCHA should provide an accounting of funding (from elected officials and the Capital plan) from the last 3 years for all developments to the RAB and to the relevant resident leadership.

Resident leaders should contact their elected officials for the latest status of funding allocations. In any instance where city discretionary funds are moved from one NYCHA project to another, NYCHA must first obtain a re-purpose letter signed off by the elected official, whether it is a City Councilmember or Borough President. This letter details the reasons for moving these funds and where they will be applied. Usually funds are redirected to other project priorities in the same district. Without these approval letters, the NYC Office of Management and Budget (OMB) will reject the revisions to the original project. This ensures that the elected officials are involved and approve the re-purposed funds.

- Red Hook East has had scaffolding in place at 791 Hicks Street, 795 Hicks Street, and 797 Hicks Street for more than three years, but no construction is being completed. Why is scaffolding in place when work is not being done? The scaffolding is dangerous, as residents are barbecuing under the sheds.

Sidewalk protection sheds at Building 6 (791 Hicks Street, 795 Hicks Street, and 797 Hicks Street) were installed in December 2019 due to unsafe conditions that have compromised the structural integrity of the façade and have the potential to harm the public. The conditions were discovered during a routine Façade Inspection Safety Program (better known as FISP or Local Law 11) inspection. NYC code requires buildings greater than six stories to be inspected and a report of the façade conditions submitted to the New York City Department of Buildings (DOB) once during a five-year cycle. If during an inspection any unsafe conditions are found, the owner must install pedestrian protection sheds within 48 hours; the sheds must remain in place until repairs and a reinspection are completed.

NYCHA faces a number of issues which prevent the timely removal of sidewalk protection sheds that are installed due to a FISP violation, such as that at Red Hook East. The estimated funding needed to address façade repairs at all NYCHA buildings which are subject to FISP is over \$3.5 billion. Implementing the FISP program, in general, is not eligible for city capital dollars' use. This means NYCHA must use its limited federal funds to conduct inspections (by a QEWI Qualified Exterior Wall Inspector (QEWI)), file reports with the DOB, put up and maintain sheds when necessary, and finally make the necessary repairs for sheds to be removed. NYCHA's federal capital funds are currently allocated to projects directly or indirectly related to the United States Department of Housing and Urban Development (HUD) Agreement. The funds that are available for the FISP program are, at this time, dedicated to maintaining compliance through inspections, filing of reports, and shed maintenance. Under the leadership of this Chair, NYCHA is pursuing additional sources of funding with HUD and the City to support more repairs that will bring sheds down.

Property management will send letters to residents regarding barbequing on premises, which is forbidden except in prescribed areas on NYCHA developments.

- In documentation provided to the Resident Advisory Board, Hernandez is slated for renovation of the side and rear yard beginning in February 2022. The work has already been completed at the front and the side of the grounds. Why was the rear yard renovation on a separate contract? When will construction begin and what did NYCHA do with the funding that the resident leadership at Hernandez secured from elected officials for the renovation of all areas of the grounds (front, side, and rear)?

City funding, such as that provided for the Hernandez grounds project, is strictly allocated to a prescribed scope of work and NYCHA has no discretion to use funds for any project except what has been approved. The funding that was secured by the resident leadership for the renovation of all of the grounds will be used for this purpose.

The funding that was available at the time the initial project moved forward was not sufficient to complete all five locations identified by stakeholders. "Location 5" - the side and rear yard at Rafael Hernandez Houses at 189 Allen Street - was separated from the others in order not to delay the rest of the project moving forward. With additional funding made available to NYCHA by the Manhattan Borough President in September 2021 (\$250,000 in FY 22) to complete renovation on "Location 5", the scope of work will be completed under a new contract. This new project is currently in Procurement and is expected to commence construction in the Spring of 2022.

- It is very helpful for resident leaders to hear about different capital projects and issues going on at other developments, so that resident leaders can learn what to do at their own developments. Resident leaders need to be well informed and need to be involved in conversations about capital projects from the beginning. Will members of the RAB and CCOP be able to attend additional meetings about capital projects, particularly if additional funding is received by Capital Projects? Resident leaders should be involved with capital projects at their developments for the duration of these projects. This includes going over the scope of work and signing-off on each phase of a given project as it is finished to ensure proper completion.

Yes, members of the RAB and CCOP will be involved in capital projects, particularly if additional funding is received. NYCHA recently signed an agreement that officially recognizes the CCOP as the Authority-wide voice for residents and its role in providing input across all areas of NYCHA's policy making and operations. The new agreement establishes how NYCHA and the CCOP will work together to increase resident participation and bring the issues that are most important to residents to the forefront of our work. It also outlines how we will share information and sets standards for communication between NYCHA and resident leadership at every level of the Authority.

Additionally, the Capital Projects Division (CPD) issued a new standard procedure to its staff outlining new processes for stakeholder engagement. The new procedure, informed by feedback from the CCOP and NYCHA's Resident Engagement team, was rolled out in order to strengthen and standardize CPD's response to the concerns outlined above, ensuring resident leaders are well informed and involved in conversations about capital projects from the beginning. At an informational or participatory level, CPD will ensure that the community is engaged during the planning and design phases of a project, and that the disruptive nature of construction on the community is acknowledged and mitigated where possible. CPD has

been and will continue meeting with NYCHA Borough Offices and TA clusters to provide information about upcoming capital projects at developments.

- Rangel Houses received funding following Hurricane Sandy. At the end of construction, four buildings did not receive interior elevator cameras that were supposed to be installed. They still have not been installed to date. When will these cameras be installed?

A camera installation project was funded by the State in the amount of \$1.5 million. The project was managed and constructed by the Dormitory Authority of the State of New York (DASNY), with a completion in Fall of 2019. The project included installation of a new Security Operations Center (SOC), nine (9) LVCs, sixty-two (62) cameras including twenty-eight (28) exterior cameras, twenty (20) interior cameras, seven (7) roof landing, six (6) elevator cameras and one (1) camera viewing the SOC office.

NYCHA is undertaking an additional CCTV installation at Rangel (scope of work determined with TA leadership) which is funded by the Manhattan Borough President's office in the amount of \$200,000 for FY2019 and another \$223,000 allocation of RESAND funds, which were transferred by the Office of Recovery and Resilience to CPD. The General Contractor will be Centennial Security Integration (CSI). Currently, the project is in the procurement phase, awaiting Comptroller registration (the portion of work utilizing city capital dollars requires Comptroller registrations. Currently it is in the first of a two-step registration process). NYCHA anticipates a response from the Comptroller's office on the first step in October and the second step registration in November. Work may commence by end of year (if there are no delay with Comptroller registration) and is expected to be completed during the summer of 2022.

- What is the projected start date of the CCTV camera project at Howard?

After stakeholder signoff on the layout of security camera projects, NYCHA must request surveys from vendors for a price proposal. This procurement phase requires approvals from both OMB and the Comptroller's Office before construction can commence. NYCHA received the final approval from the Comptroller's office to proceed with this project in September 2021. A kickoff meeting for construction is scheduled for October 18, 2021.

- NYCHA needs to clarify who determines the specifications for capital projects. Who determines what materials should be used, how the materials should be used, and what information will be shared with residents and resident leaders? When something is changed in the design from the original specifications, why aren't residents and resident leaders notified? For example, at Johnson Houses, the doors were previously painted with semi-gloss paint. Recently, NYCHA has been repainting the doors, but the paint is not the same, and the specifications were changed without the resident leader being notified. In the past, resident leaders used to receive samples of materials before the work began. Why did that process change?

For capital projects, materials and specifications are identified in the contract documents and are developed by licensed architects and engineers. They are informed by industry standards and the NYCHA Design guidelines which are publicly available on the NYCHA website here: <https://www1.nyc.gov/site/nycha/about/departments/cpd-design-standards.page>. Finishes are presented at design meetings. If there is a material change to the design, this would require a change to the contract. Those types of changes are identified and documented in the bi-weekly construction meetings. TA leadership is encouraged to attend those meetings.

NYCHA painted the public space doors, stair halls and apartment doors at Johnson Houses under the Public Space Initiative in July 2021. The tenant association president and board members were closely involved with the decision-making process for this project, from the selection of the color of paint that would be used in the public spaces to the stair halls, elevator, and apartment doors.

- The Capital Project Design Department does not have transparency with resident association leaders, and the designs are changed at their will without notifying residents or resident leaders. Recently, at Mariners Harbor, Capital Projects removed 20 feet of a project without telling anyone and the resident leader had to contact their City Council member to stop the work. In retaliation, the contractors stopped completing the work. Why did this happen?

The new standard procedure for stakeholder engagement on capital projects is meant to ensure residents are informed and part of the design decisions. Due to the nature of constructions, unforeseen conditions can arise from time to time. In the case of the Mariner's Harbor basketball court, the layout of the court was modified by the CPD design team after a site visit which showed there was a safety issue and necessary clearances between the court and the fencing were needed. This reduced the size of the court by about three feet.

The new procedures will ensure that resident leaders are informed of changes of this type.

Additional funds were needed to relocate the existing fencing at Mariner's Harbor so that the court could be sized as originally planned. This new funding was provided, and the project was completed at the original court size.

- There is preferential treatment for each borough, and Staten Island does not receive the same treatment as other boroughs.

Using data driven decision making, capital planning at NYCHA ensures the limited resources NYCHA receives are allocated strategically to ensure the preservation of NYCHA's housing stock for the next generation, without regard to the boroughs in which NYCHA housing is located. Information captured through the PNA process, as well as conditions ratings for each major system component in a building (from needs replacement to brand new) is used to determine where funding is applied. Funding is allocated to the components most critically in need of replacement.

- Why are the same contractors repeatedly hired across boroughs, and why are contractors paid weekly? NYCHA should only pay contractors a stipend until the project is completed and the project has been signed off by the resident association and property management.

NYCHA follows industry standards, and contractors are paid based on materials and services supplied. There is funding set aside in a contract to ensure that vendors are completing the work satisfactorily. Final payments are contingent on warranties and guarantees being provided, regulatory sign offs completed, and final approval by property management staff.

- How can developments that are not undergoing PACT/RAD conversions receive the same upgrades and renovations and the same quality materials? Any NYCHA apartment would look better if more thought and quality was put into the renovations. NYCHA should make uniform cosmetics improvements as renovations and repairs are made in non-PACT/RAD NYCHA developments.

NYCHA has developed a set of Design Guidelines similar to those used in PACT/RAD conversions. The Design Guidelines are available to view here:

<https://www1.nyc.gov/assets/nycha/downloads/pdf/nycha-design-guidelines.pdf>. NYCHA is moving towards comprehensive modernization where the entire development is renovated instead of single components (i.e. roof replacement). This will be similar to the holistic renovations that are completed at the PACT conversions.

- For materials used in renovations and repairs, NYCHA is often billed triple the cost. The cost for replacing the doors at one building can be \$1 million. NYCHA should be billed at cost for all materials. Why are NYCHA residents receiving substandard materials when NYCHA is paying above cost?

NYCHA's capital contracts are publicly procured and the pricing that NYCHA receives is similar to that of other public agencies. In the case of the entrances, the current, expensive design of the doors dates to a previous era. CPD has developed, with resident engagement, a new standard for a revised entryway steel-reinforced aluminum storefront design that addresses safety, cost, and energy codes. The first pilot installation began construction earlier this year. Once installed, these entryways will be evaluated by stakeholders, including residents. The new design is less expensive and uses standard parts so Operations staff can easily and cost-effectively repair entrance doors or call for replacement.

- When completing renovations at developments, NYCHA should complete renovations systematically. This can be achieved by requiring all residents in one line to be home on a given day to complete the work, and then requiring all residents in the next line to be home the following day, and so on.

When possible, construction projects are scheduled as described. However, we recognize that the hours of construction are highly regulated by DOB and that residents may not be home during those hours. CPD works with the development staff and residents to accomplish the tasks it needs to do to complete the work expeditiously, while providing options for residents who cannot be available during construction hours.

- At the conclusion of a project, inspectors often tell resident leaders that “compliance changed this” when asked why changes were made over the course of the job. What is Compliance’s role and why do they make changes at the end of the job?

Documents are filed by licensed professionals with NYC and are approved by the Department of Buildings (DOB) and other regulatory agencies. There should not regularly be a change of conditions due to compliance. Along with field inspectors providing oversight on the site, CPD employs safety and quality assurance inspectors who frequently visit the construction sites to ensure that contractors are complying with the contract documents that were approved. It would help us to have some examples to understand this issue better.

- There is a significant mold and leak problem at Ingersoll Houses. There are contractors working on the roofs, which is causing leaks from the roofs into many apartments in the development. There are holes in the roof that lead directly into apartments. There was already a mold problem, but these leaks are making the mold problems even worse. Residents with health issues were offered temporary housing during this construction and they are now being displaced. Many of their personal belongings have been damaged and some apartments have no electricity because of the leaks. What can NYCHA do to fix the ongoing issues with the roofs, mold, and leaks at Ingersoll Houses? In addition, the contractor performing work at Ingersoll Houses is not properly covering residents’ air conditioning units and windows when performing work. The contractors are drilling into the bricks and the scaffolding is damaging

the air conditioning units. The contractors should not be damaging the air conditioning units or the windows when performing work.

Currently there is a capital project at Whitman and Ingersoll for façade repair related to Local Law 11 and parapet replacement, a constant cause of water infiltration. NYCHA has investigated and identified where there are leaks in the current roofing system. Those repairs are being addressed by the roofing manufacturer where the warranty is valid or by NYCHA where there is not a valid warranty in place. Work on the roofs where there are leaks should be completed by the end of the year.

- Three buildings in Red Hook East have been without gas since May 1, 2021. Following the recent storms, apartments and the resident association office were completely flooded and now there are issues with mold. When will the gas be restored and when will the mold issues be remedied?

Before gas riser work could begin, Red Hook East was awaiting clearance from NYCHA's Asbestos Unit. After the certification was provided by the Asbestos Unit, property management needed to wait for permits from the Department of Buildings to start the installation of gas risers. Installation of gas risers commenced on 9/28/2021 in basement area for building #6. Work inside the units started on 9/30/2021. DDS Mechanical is the vendor responsibility of installation of gas risers. A lobby meeting was held on 9/30/2021. Building #5, E line is waiting for the Asbestos Abatement Unit to provide certification to request permits from Department of Buildings to move forward with work. Mold Remediation work is anticipated to begin in early November on the entire C line apartment located at 167 Bush Street.

Additional Comments

Transformation Plan/Blueprint for Change

- Will NYCHA still remain in place once the Blueprint is implemented? Will the Trust be governing over NYCHA? Will it still be called NYCHA? What is the relationship between the Trust, NYCHA, and the Blueprint?

NYCHA will remain and continue as a Public Housing Agency regardless of whether the Trust is approved. The Trust is only a tool for leveraging additional funding and facilitating the comprehensive rehabilitation of NYCHA properties – it is never intended to be a replacement for NYCHA. NYCHA will continue to be the permanent owner of the properties, as well as the property manager for properties during and after rehabilitation by the Trust. In addition, NYCHA will manage the project-based Section 8 vouchers for all residents within the properties transferred to the Trust.

- Are the organizational changes NYCHA is making required as part of the transition to the Blueprint plan?

The organizational changes that NYCHA is making are required as part of the HUD Agreement and the Transformation Plan, and to better serve our residents. Since NYCHA will remain the on-site property manager whether the Trust is approved or not, these changes are important regardless of the outcome of that legislation.

- When NYCHA talks about organizational changes in relation to the Transformation Plan, what specific organizational changes will be made? Will they be addressing upper or middle management?

*Please see the Transformation Plan and Executive Summary linked here:
<https://www1.nyc.gov/site/nycha/residents/blueprint-for-change.page>*

The primary change is the implementation of the Neighborhood Model, which shifts NYCHA's operating model from a six-borough structure (2 functional boroughs – NextGen Operations & Mixed Finance – and 4 geographical boroughs) to a four-borough structure, with all properties within their geography and Queens and Staten Island together). The Neighborhood Model also breaks down NYCHA's properties further into 30 neighborhoods and each neighborhood is led by a Neighborhood Administrator (NA). The goal of the Neighborhood Model is to allow for a smaller scale of operations, more line of sight by managers to daily conditions at the properties, and more direct accountability for management.

In support of the Neighborhood Model, NYCHA is also planning to decentralize skilled trades as part of the Work Order Reform project, which will better sequence and schedule skilled trades work. Additionally, NYCHA is also exploring the reorganization of central office support functions such as Human Resources, Finance, Procurement and IT to better serve property management operations. Together, these initiatives represent the key organizational changes in the Transformation Plan.

- If you have multiple tiers of supervisors managing employees, but none of those tiers are being held accountable, that will not address NYCHA's issues. What would the solution be to actually have accountability? This is something that should be addressed in the Transformation Plan.

Accountability is a key goal of the Transformation Plan. However, it must start at the property level by setting new standards for performance and holding staff accountable to those standards. One example is through the revised Alternative Work Schedule (AWS) program. Caretakers and Supervisors need to be held to a uniform standard of cleanliness and NYCHA needs to ensure the resources are in place to achieve those standards before we can have true accountability.

- NYCHA needs to explain what it means to break down silos. Will the silos that are being broken down as a part of the Transformation Plan allow for residents to be in more partnership with NYCHA? Residents should always be at the table with NYCHA.

We agree that we need more partnerships with residents and have started to partner more through our project workstreams, which have CCOP and Resident Roundtable member participation. One example of NYCHA breaking down silos across our staff is by ensuring teams have representation from various parts of the Authority. NYCHA has assembled Pillar Teams to address compliance with the HUD Agreement and those teams have staff from not only the core operations area (heat, elevators, etc.) but also from IT, Human Resources, Procurement, etc. This ensures that everyone is working in the same direction to improve services.

- Are NYCHA residents allowed to become NYCHA Change Ambassadors?

Not at this time, but we envision the Resident Roundtable as acting in a similar capacity as Change Ambassadors. We are happy to further discuss this with the RAB.

- When it comes to the selection of residents for the Resident Roundtable, NYCHA states “confirmation of NYCHA residency in good standing”. NYCHA needs to clarify what “good standing” means.

For Resident Roundtable participation, “good standing” is defined as current in all rent payments, not in violation of any NYCHA rule or regulation, and with no Termination of Tenancy proceeding pending.

- In terms of the Resident Roundtable, how will assisted housing (Section 8) residents be included? NYCHA should include a fair number of Section 8 residents for their recruitment and selection of Resident Roundtable members. Out of the 25 slots, NYCHA needs to dedicate at least five for Section 8 Residents. NYCHA also needs to clarify if RAD/PACT residents will be eligible to be part of the Resident Roundtable.

The Resident Roundtable is providing recommendations on NYCHA operations, particularly property management. Since NYCHA’s Housing Choice Voucher/Section 8 program is primarily in privately owned and managed properties, we did not extend the invite to participate. However, we did fill two placements from the RAD/PACT portfolio because those Section 8 participants are former NYCHA residents and can provide important feedback and a before/after perspective on property management operations.

- Many people, especially seniors, do not have Broadband. Will NYCHA be broadly publicizing and opening the Resident Roundtable application to seniors and those without Broadband? NYCHA should clearly explain how it will broadly publicize the twenty-five Resident Roundtable slots. NYCHA should include information about the Resident Roundtable in the rent bill.

The members of the Resident Roundtable are all required to have Broadband due to requirements for virtual meetings during COVID protocols., The Resident Roundtable members are required to perform outreach to residents in the developments across their Neighborhood, specifically seniors and others without broadband access, in order to bridge that divide. Once the COVID protocols are no longer in place, we hope to resume in person meetings and activities and have additional participation in future Roundtable recruiting.

- Will the CCOP choose five members from the RAB or CCOP for participation on the Resident Roundtable, or are the five members being chosen from their own developments?

The CCOP was able to select five residents to participate in the Roundtable, two of whom were active CCOP members. The 27 remaining Roundtable members were chosen through a lottery process within their Neighborhood. NYCHA’s goal was to have one Roundtable member from each of the 30 Neighborhoods, along with two members representing developments converted through PACT. As of October 1, 2021, the Roundtable is at full strength with full representation.

- In regard to the Resident Roundtable’s recommendations for NYCHA’s policy and programs, the CCOP and RAB have been making recommendations for years without implementation. What is NYCHA going to do to assure residents that this is not an exercise in futility and that

the recommendations made by the Resident Roundtable will become a part of NYCHA's policies?

As part of the Transformation Plan, NYCHA has committed to ensuring residents are at the table in our project workstreams and through the Roundtable. We have already begun to implement some resident recommendations as part of the Work Order Reform project team. We want the changes we make at NYCHA to improve service delivery and quality of life for our residents. We hope that, working together, we will be able to review the recommendations and discuss pathways for implementation. All recommendations that are not accepted for implementation will still be reflected in the published Implementation Plan with an explanation for why the recommendation was not accepted.

- In terms of the Resident Roundtable time commitment, part of that commitment should be attendance. If members miss a certain number of meetings, they should be removed from the Board. The time commitment and attendance should be taken very seriously for members.

We concur completely that in order to fulfill their critical role of soliciting and incorporating resident feedback into the work of the Transformation Plan, Resident Roundtable members must fully participate in all meetings, complete necessary meeting prep work, and conduct their resident engagement requirements (approximately 4 hours per month). As such, Roundtable members' stipends are contingent upon this full participation. In addition, as NYCHA informed Roundtable members, NYCHA reserves the right to remove any Roundtable member should they fail to meet the requirements of full participation.

- NYCHA needs to better explain work-order reform and how, as a part of the Transformation Plan, skilled trades will be moved to the borough, neighborhood or development level.

We would be happy to do a detailed presentation to the RAB on the Work Order Reform project. This project entails assigning staff to a neighborhood, and sometimes to a borough or development, and also changing the sequencing and scheduling of skilled trades. Currently, the scheduling of skilled trades work is done piecemeal. Under the work order reform project, the resident will work with a neighborhood planner at the start in order to schedule each of the skilled trades required to finish the job. This also provides better visibility into the entire repair process.

- If a Borough (e.g. Brooklyn) has 9 neighborhoods under the Transformation Plan, will each of the 9 neighborhoods have trades assigned specifically to that neighborhood?

Under the Work Order Reform project, our goal is to have skilled trades assigned to the neighborhood and sometimes even the development level. We are working on a staffing plan as part of the 2022 budget to fully implement this project.

- NYCHA needs to be more specific than saying "...empower residents to improve quality of life" as part of the Transformation Plan. Is there a plan that residents will be given?

There is a second edition of the Transformation Plan that will include specific details on the actions NYCHA is taking, including timing and anticipated results. This plan will be available to residents as well.

Other Comments

- The RAB requests that all RAB members receive a copy of the minutes following each RAB meeting. In addition, NYCHA should create an action item spreadsheet that lists all of the issues raised and the status of each issue. The spreadsheet should be sent to all RAB and CCOP members.

NYCHA's Resident Engagement Department will circulate a copy of the meeting minutes, as well as an action item spreadsheet, following each RAB meeting.

- At one point, NYCHA's population was over 400,000 residents and the number of developments was 324. Have the numbers changed over time as residents expired, or as developments transitioned to RAD/PACT?

The numbers above refer to the number of developments and residents in NYCHA's public housing (Section 9) portfolio. These numbers have changed over time as NYCHA has transitioned developments from the public housing/Section 9 portfolio to the Section 8 program under the Permanent Affordability Commitment Together (PACT) / Rental Assistance Demonstration (RAD) programs. As of March 2021, NYCHA serves 358,675 authorized residents in 168,100 apartments within 285 housing developments through the conventional public housing program (Section 9). NYCHA also serves 20,201 authorized residents in 9,511 units within 50 developments that have been converted under the PACT/RAD programs.

ATTACHMENT N

Comments and Challenged Elements from the Public

Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures

- NYCHA needs to listen to and communicate with tenants, including in instances when a family's needs have changed, and a different apartment arrangement is required. This includes potentially splitting families into separate apartments when a resident acquires a disability, granting that resident an accessible apartment while other family members remain in a non-accessible apartment.

NYCHA's transfer policy accommodates individuals with disabilities. Also, NYCHA occupancy standards consider family size and composition. Splitting, or bifurcating, an apartment is authorized under federal law and regulations only for specific cases of domestic violence where NYCHA addresses the emergency need of the victim and pursues a termination of tenancy action against the alleged perpetrator.

- Why would a reasonable accommodation request for a new apartment based on mental health needs be denied?

Requests for reasonable accommodation based on mental health or other disabilities are considered in accordance with NYCHA's reasonable accommodations policy. Reasonable accommodation requests are initially reviewed by NYCHA's Applications & Tenancy Administration Department (ATAD). If ATAD cannot approve the request, it is forwarded to the Public Housing Reasonable Accommodation Coordinator (PHRAC) for evaluation. The PHRAC makes a determination approving or denying the request. If PHRAC denies the request, the tenant has 30 days to request an informal conference and resubmit updated supporting medical documentation. Once the revised documents are received and reviewed by the PHRAC, the PHRAC will approve or deny the request. If the documentation does not meet the requirements, the PHRAC informs the tenant and submits a request to NYCHA's Hearing Office for a grievance.

- It is very difficult to find one-bedroom apartments which accept Section 8 vouchers and that are affordable with rising prices and gentrification.

Finding an affordable unit can be challenging. Apartment availability is based on inventory in the private market. Voucher holders can view a listing of properties available to voucher holders seeking units in the private market. The listing is maintained by [GoSection8](#), the largest rental listing service provider for the Section 8 housing market. If you have any questions about viewing property listings, please contact GoSection8 at 866-466-7328.

- Why would it take NYCHA 3 years to submit a name change for a resident?

Staff required additional information to respond to this inquiry and followed up with the resident directly. If a resident legally changes their name, the resident must complete an interim recertification and provide supporting documentation (e.g., social security card,

government-issued ID, and court document). If the request is complete, staff will update its records to reflect the name change.

Financial Resources

- Where is the funding going every year for NYCHA? Why is every development experiencing similar or the same issues?

NYCHA publishes the Budget Summary and Budget Book annually. NYCHA's Budget Summary is a broad overview of NYCHA's proposed budget for the current year. NYCHA's Budget Book provides a detailed accounting of NYCHA's proposed Budget and Financial Plan for the current year, as well as the next four years. Both documents are available here: <https://www1.nyc.gov/site/nycha/about/annual-plan-financial-information.page>

NYCHA developments are experiencing similar issues due to their age, as well as the lack of investment in public housing over time. Capital investments for NYCHA public housing are funded annually by Congressional allocations. For the past several decades, funding for public housing has been on a steady decline. After decades of disinvestment, the need for rehabilitation both in New York City and across the nation has become dire. NYCHA currently has a \$40 billion deficit that grows by approximately \$1 billion per year. Despite this current deficit, day-to-day maintenance, repair work, and capital projects are continuing. Federal, state, and city law require that NYCHA repair its properties now, and NYCHA is using every dollar available to do so.

- NYCHA has not included Resident Leaders in prior decision-making around spending, contracts, and staffing needs. This lack of inclusion makes it more difficult for resident leaders to assess and comment on new plans as they are released.

NYCHA is launching training for resident leaders on NYCHA's annual budget process and incorporating resident leadership into discussions on property-based budgeting at the development level in collaboration with their property managers.

- NYCHA should allocate funding, or have a separate budget, for security in order to hire doormen or a security detail/company for buildings.

NYCHA does not have funding available for additional security at this time.

Rent Determination

- What is the procedure for resolving incorrect balances that resulted from recently completed annual recertifications?

If a resident is not satisfied with the results of their annual recertification, they should contact their Property Management Office to schedule a meeting. If necessary, residents can submit any new pertinent information at this meeting.

- Will NYCHA be updating leases such that non-nuclear family members living with a relative long-term may be formally added to the lease?

The only names that are included on the lease are the tenant and co-tenant (the lessees, or in other words, the people who signed the lease). Authorized household members (with permanent residency permission or temporary residency permission) are recorded in NYCHA's records. Authorized residents with Permanent Residency Permission are listed on the Lease Addendum and Rent Notice, and annual Affidavit of Income, but not on the lease document.

- The online NYCHA Annual Recertification Self-Service Portal needs to allow residents to report their disability or medical hardships.

Currently, residents have the ability to update NYCHA of their disability status early in the Annual Recertification Self-Service Portal flow. On this screen, members can edit their disability status along with any access or function needs they may have. Residents will be able to view a summary of all members' statuses later in the process. On the Self-Service Portal, a resident can also add medical or disability assistance expenses.

- The online Annual Recertification Self-Service Portal does not show Recertification Forms to download or print for non-primary tenants. Will this issue be resolved?

Currently, a resident cannot access the Self-Service portal to print or download documents for any tenant in the household until all requested documents are uploaded, submitted, and are processed by staff. Residents can only view documents they uploaded or submitted on the Self-Service Portal if there is additional information required. Once all documents are submitted, the system makes these materials available to NYCHA staff for processing and residents can no longer change or view the information.

Operation and Management

- NYCHA supervision should give Caretakers instructions for how to better clean the developments. NYCHA should also provide its staff with better equipment. This is a significant problem at Williams Plaza.

NYCHA agrees that supervisors are required to give tasks and instruction to the caretakers and ensure they are properly trained and equipped. Supervisors are also tasked with verifying that their subordinates are completing their assignments timely and properly.

Williams Plaza was converted to RAD/PACT in February 2020, and the developer employs the maintenance staff. PACT residents may contact their property management office to request work in their apartments and/or common spaces. Of course, we hope that all of our PACT partners are able to address conditions in a timely manner through their standard repair system. However, PACT residents still have access to the CCC and can also call 311 to request an HQS inspection if they have an issue that is not being addressed quickly or safely.

NYCHA requires our PACT partners to report on work orders and have been enhancing our procedure for monitoring our partners' response time to maintenance requests. We also review publicly-available data to assist with our ongoing monitoring of compliance with their regulatory obligations.

- At Marcy Houses, some buildings are not cleaned unless the Regional Asset Manager (RAM) is present. This has been an endemic issue, even prior to COVID-19. NYCHA staff need to do their jobs, even when a supervisor is not present.

The Neighborhood Administrator at Marcy Houses noticed issues with garbage collection and how garbage was managed at this location and met with the Supervisors to go over the conditions found and the remedies for them. The Neighborhood Administrator, along with Management staff, spent several weeks reorganizing collection, ordering rodent proof cans, and prioritizing cleanliness as a focus. During that time, an effort was also made at reinforcing and restoring the cleaning regimen to meet NYCHA standards and practices. One such effort was to focus on the mopping schedule and holding supervisory staff accountable to keep staff focused. This process was followed as directed for several months and continues to date.

With the integration of the floor care crew, the floors in the development's common areas have been addressed in a timelier manner and stripping and waxing has now begun. We will continue to monitor the conditions for improvement.

- At Marcy Houses, when residents complain about the lack of maintenance/cleaning, staff may tell other staff who made the complaints, making residents feel uncomfortable and potentially unsafe. This kind of behavior needs to change.

This behavior, as reported, is not to be tolerated. NYCHA requires and seeks to encourage feedback from residents as part of our effort to address conditions in a timelier manner. Any such occurrence should be reported to Property Management immediately in order to conduct an investigation and potentially take the appropriate disciplinary actions where verified. No resident should hesitate to report any maintenance and/or cleaning concern to staff for resolution.

- NYCHA should make the Repair Hotline available 24hrs daily and emergency services 24hrs again.

NYCHA's Customer Contact Center (CCC) takes calls for maintenance repairs Monday through Friday from 6:00am – 12:00am (midnight). Emergency calls are taken by the CCC 24 hours a day, 7 days a week.

- NYCHA has invested time and resources in the Blueprint for Change and the Draft Annual Plan rather than investing that time and effort into creating plans to protect residents against COVID-19.

In March 2020, NYCHA created a COVID-19 Guidance and Resource page on the NYCHA website that includes information about NYCHA's COVID-19 measures, frequently asked questions, and COVID-19 HUD waivers. The website was regularly updated and is available here: <https://www1.nyc.gov/site/nycha/about/covid-19-resources.page>

Since March 2020, NYCHA has shared approximately 1,500 posts via the agency's social media channels - Twitter, Facebook, Instagram, YouTube, and LinkedIn - on COVID safety and vaccination related information. In addition, from March 3, 2020 to August 4, 2021, NYCHA published 55 articles on The NYCHA Journal website featuring information on

NYCHA's COVID-19 measures for residents and Section 8 property owners and participants. All articles are available to view here: <https://nychajournal.nyc/category/covid-19/>

NYCHA developed and implemented various policies and protocols to prevent the spread of COVID over the last year. Some of these included the following:

- Procured vendors to provide routine cleaning and disinfection of frequently touched surfaces in common areas three times per week at developments and daily at seniors-only buildings
- Developed policy and guidance to continue to perform emergency and critical in-unit repairs while protecting both residents and employees against COVID-19.
- Established a COVID-19 monitoring team within the Environmental Health & Safety Department to develop COVID-19 guidance documents, monitor reported cases, review and approve COVID-19 safety plans, investigate COVID-related complaints, identify potential locations of concern, and provide guidance to employees or residents with questions.
- Implemented a Health Screening tool for all NYCHA employees and visitors to complete prior to entering a NYCHA property or Central Office location.
- Established a requirement and tools for all NYCHA vendors to submit COVID-19 safety plans for review and approval prior to performing work at any NYCHA development.
- Established a requirement for groups planning events on NYCHA grounds to submit safety plans to EHS for review and approval prior to the event.
- Developed and administered online training for NYCHA employees to educate them on protecting themselves and others, including residents, from COVID-19.
- Developed alternatives to in-person interactions with residents to enhance safety
- Required face coverings for all residents visiting development management offices
- Posted Stop the Spread signage in all NYCHA locations
- Established protocols for employees to report suspected/confirmed positive cases.
- Required all employees and vendors to wear face covering when in any NYCHA developments, Central Offices and during any interactions with residents and the public.

NYCHA also has been working closely with the City and State on various vaccine outreach efforts:

- In January 2021, the City and State partnered with NYCHA to open vaccination clinics at multiple targeted NYCHA developments with high concentration of seniors, through which more than 2,000 residents 65 and over got their vaccines. Building on this effective community-based model, Rapid Reliable Testing (RRT), SOMOS, Northwell and several Federally Qualified Health Care ("FQHC") providers continued to operate roving pop-up vaccination clinics at NYCHA developments, reaching a total of 69 NYCHA developments.
- In March 2021, NYCHA and the VCC created a long-term vaccination plan for our residents including long-term vaccination hubs, long-term pop-up sites, and stand-alone sites in geographically isolated developments. NYCHA identified spaces centrally located in multiple developments (Community or Senior Centers) to make it easier and more accessible to our residents living in that neighborhood.
- The City and NYCHA have also widely publicized that vaccines are available to residents at their homes.
- These efforts are a key component of the City's ongoing work to ensure equitable distribution of the COVID-19 vaccine, including by making the vaccine accessible in

neighborhoods hardest hit by the virus and working to address vaccine hesitancy at the local community level.

- *To spread awareness about the vaccine clinics and available appointments, the City is also conducting ongoing outreach on the ground, including door-knocking, making sure residents feel informed and safe in getting vaccinated and helping navigate the process. NYCHA also hired a team of thirty outreach staff, primarily residents, who are increasing vaccine literacy and performing targeting canvassing and supporting community vaccination events.*
- NYCHA needs to consider and disclose its use of the strong products it uses in cleaning/repairing residents' apartments, and how those chemicals and products are impacting residents' health.

All NYCHA locations are required to maintain information on the products and the Safety Data Sheets for all chemicals used at that location. Safety Data Sheets provide information on any hazards associated with a chemical product and the required safety precautions that must be implemented during use. Any resident may request information on the products being used in his/her apartment or development common areas. Residents can obtain this information from the Property Management Office or by submitting a request for this information in the "Submit a Concern" tab on the NYCHA webpage. If the product was used in conjunction with the completion of a work order ticket, the resident should include the work order number when completing the "Submit a Concern" form.

- NYCHA must create a new plan. The plan must include an environmental impact assessment which recognizes the potential loss of green resources under this "draft proposal" which augments the environmental neglect/ harm currently caused by NYCHA's lack of stewardship. This is urgent as the COVID pandemic unduly exposed NYCHA's residents to aggravating lead dust, heat, and increased water damage. This led to a higher rate of COVID infections, lowered immunity, and deaths, among NYCHA developments.

NYCHA regularly works with HUD and other federal partners to ensure its environmental review obligations, consistent with the National Environmental Policy Act, are satisfied.

During the height of the pandemic, in order to protect residents and employees from undue exposure to the virus that causes COVID-19, NYCHA suspended the completion of non-emergency and low priority work in units. However, NYCHA continued to attempt to enter units to address priorities such as mold and leak conditions and priority lead abatement work where applicable. Any vendor or employees entering units were required to wear face masks and residents were also required to do the same while remaining in a separate room from the work area. When performing work in units or common areas that may potentially disturb lead-based paint, all NYCHA vendors and employees are required to follow EPA, HUD, and OSHA's established lead safe work practices. All individuals performing this work are required to be Certified Renovators under EPA's Renovation Repair and Painting rules ("RRP"). As trained Certified Renovators, NYCHA vendors and employees contain work areas to prevent resident exposure to lead-based paint dust and debris. Additionally, wet methods are used to suppress dust generation, and work areas are cleaned using a HEPA Vacuum and wet cleaning methods to remove all dust and debris. The EPA's RRP cleaning verification process is also followed to confirm that work areas are effectively cleaned. Clearance dust wipe sampling and analysis is performed after completion of the work to verify that lead dust has been adequately removed.

- At Jacob Riis Houses, the elevator is out 2-4 times a week, and there is no intercom while downstairs door is still locked. This makes it impossible for those with disabilities to open the door. When will the elevators be repaired?

As of August 17, 2021, there have been 48 reported outages at Riis Houses in the past 30 days. The majority of reported outages are due to isolated mechanical failures. All reported outages have been resolved and the supervisors continue to monitor the performance of the elevators.

- Jacob RIIS I Houses has had no hot water every Thursday for the past several months, listed to begin at 9am, but starting as early as 7:30am some days providing residents with no ability to get ready for work or get their children ready for school.

NYCHA's Heating Services Department is not aware of any ongoing hot water issues at Jacob Riis Houses between May and August 2021. On August 12, 2021, hot water outages took place in multiple buildings due to work being conducted onsite, but those outages were resolved. Please call NYCHA's Customer Contact Center (CCC) at 718-707-7771 if you are experiencing a hot water outage. NYCHA's CCC take calls for maintenance repairs Monday through Friday from 6:00am – 12:00am (midnight).

- Management Office workers and managers need to attend new training sessions which teach how to respect and accommodate tenants, and how to assist them with their needs, as well as how to maintain regular communication by regularly following-up with residents. NYCHA's Management Offices should also support residents in seeking financial support for tenants who need it, before they are taken to court.

NYCHA offers an "Exceptional Customer Service" training course, which is available to all NYCHA employees and is required by various NYCHA departments. From January 1, 2019 to September 1, 2021, 453 property management staff have completed this course either in-person or virtually. The course objectives are as follows:

- *Define exceptional customer service.*
- *Define your internal and external customers.*
- *List what customers expect from you.*
- *Define accountability using The Oz Principle.*
- *List the three signals of customer service recovery.*
- *List things you should not say to customers.*
- *Describe the importance of closing the customer service loop.*

Additionally, property management staff are able to leverage NYCHA's Office of Resident Economic Empowerment & Sustainability (REES) Zone Partner list that includes best-in-class economic opportunity providers committed to serving NYCHA residents in the areas of employment and advancement, financial literacy, adult education, job training and business development. Property Management staff are trained by REES to make electronic referrals for residents interested in such services. Providers participating in the referral system commit to calling back residents to make their first appointment to obtain services.

NYCHA's Family Partnerships Department ("FPD") staff can also assist any resident who needs assistance with obtaining funds for HRA's One Shot Deal. FPD Staff meet with the resident and assess their need and eligibility and to determine what at level of care the resident may need to navigate the HRA process. FPD staff explain how to navigate the

process, what documents need to be filled out and provided to HRA and support the resident through the process.

In order to apply for a One-Shot Deal, the tenant of record (TOR) needs to contact their management office and request a rental breakdown. Once the breakdown is received, all documents need to be uploaded to on the Access HRA website. Once all the documents are submitted, the resident will receive a case number for follow up. Approval may take up to 45 days.

Residents can also call the HRA hotline and go into an HRA office to apply for a One-Shot Deal. If the resident needs additional hands on support, staff will refer the resident to HRA's HomeBase program or another HRA approved CBO office that can support by putting all the documents together.

- NYCHA needs to notify residents in a timely fashion about the presence of lead in their homes.

A multi-step process is in place in order to accurately notify residents about the presence of lead in their homes. During the XRF inspection of the unit, if there is a positive reading on metal components within the unit, the vendor collects paint chips to confirm if the paint or the substrate behind the paint is positive. These results are dropped off at a lab for analysis and then returned to the vendor. After the vendor receives the lab results, they must conduct a review of the inspection and the lab results and prepare the Notice of Evaluation and mail this form to the resident. The Notice of Evaluation is also submitted to NYCHA for staff to review the report and results and upload the files into NYCHA's internal asset management system. At this time, the Notice of Evaluation is added to the online tenant portal.

- NYCHA does not provide ASL interpretation when holding meetings with residents. ASL interpretation and reasonable accommodations should be the number one priority at every meeting. Tenant Associations should also be supported with resources by NYCHA to address the issue of language access or other needs. NYCHA should consider hiring a team that is dedicated to accessibility, instead of having to contact outside vendors or the Mayor's Office for People with Disabilities to provide support.

*NYCHA **does** provide American Sign Language interpretation and reasonable accommodations at resident meetings. In fact, in 2020, the Language Services Unit (LSU) contracted with an American Sign Language vendor to provide "in-person" ASL services at 18 resident meetings/hearings. In 2021, ASL vendor services were provided at 38 in-person and/or virtual meetings.*

NYCHA accommodates language access needs by providing interpretation and translation services. At the virtual NYCHA FY 2022 Draft Annual Plan and Draft Significant Amendment to the FY 2021 Annual Plan Public Hearing held on July 27, 2021, for example, Spanish, Chinese Mandarin, Russian and ASL interpretation services were provided. The Plan's Executive Summary and related written documents were translated into Spanish, Chinese Traditional, Chinese Simplified, and Russian. NYCHA made the Blueprint for Change and Transformation Plan available in eight additional languages: Arabic, Bengali, French, Haitian Creole, Korean, Polish, Urdu and Yiddish. NYCHA also has a contract with an external language vendor who provides on demand over-the-phone interpretation services for Operations property management. Staff are able to call a language hotline phone number to provide interpretation on the spot if an interpreter is needed.

- NYCHA needs to properly name the spoken languages it is providing for interpretation. Chinese is not a spoken language—rather people speak Mandarin or Cantonese.

Thank you for calling this to our attention. NYCHA will take your suggestion under advisement.

- Because NYCHA no longer handles repairs internally, the Management offices often don't know what vendors are up to.

Repairs at NYCHA developments are made utilizing a combination of vendors and NYCHA staff. All vendors are required to sign in with development offices when performing work on site.

NYCHA's Capital Projects Department has a punch list and completion verification process for all capital projects work. The development property manager, along with field staff conduct a walkthrough to ensure all stakeholder concerns are addressed as part of this process. The punch list is also initialed by the Property Management designee. Vendors are also monitored through mandatory daily sign in and sign out sheets when onsite.

- The Baruch Houses development is having power outages with little to no notice.

All planned power outages require a 48-hour notice to be posted in all NYCHA building that are impacted by the outage. This notice provides the nature of the outage and the anticipated duration of the outage so residents may plan accordingly.

- Residents need to be clearly informed when management offices and consolidations are changing. The residents of Wise Towers were not informed that there was a change in the consolidation with DeHostos.

NYCHA is committed to keeping residents informed of changes in management offices that are the result of a Permanent Affordability Commitment Together (PACT) / Rental Assistance (RAD) conversion. Wise Towers converted to PACT/RAD in November 2020. At that time, the management office for the Wise Towers Consolidation was moved to DeHostos Apartments. Notification of these changes was provided to residents of the former Wise Towers Consolidation.

- There is a lack of communication from Management from several developments in district 74.

NYCHA property management will make every effort to improve communications with the 12 developments located in New York State Assembly District 74. On June 28, 2021, the Manhattan Property Management Department arranged a "Meet & Greet" for the residents of Riis Houses and the property management staff (Riis Houses is located within the District 74). During this time, residents were introduced to the management team and were able to discuss concerns about the conditions in their apartments and buildings. Plans are to conduct similar "Meet & Greet" sessions with other developments within District 74.

- Amsterdam Houses needs help with pests, specifically roaches and rats.

NYCHA has been monitoring and treating more frequently at Amsterdam Houses. Through this we were able to eliminate infestations in the compactor rooms and reduce rats on the grounds. Additional seasonal staff were assigned to this location to continue to perform extra cleanings in the basements.

NYCHA has also been working with the construction company to reduce pests in their work area. They moved equipment onto concrete instead of laying it on soil, which allows rodents to burrow under. NYCHA also supplemented the contractor's vendor pest control work with NYCHA's own staff through September 15, 2021.

- NYCHA should have orderlies, or staff at the buildings 24/7 who do nothing but clean. A city beautification ordinance by City Council could possibly allow funding for such orderlies.

Through the Blueprint / Transformation Plan, NYCHA aims to operate as an efficient and effective landlord; repair public housing and build affordable housing stock; address critical health and safety issues in our buildings; and connect residents to best-in-class social services and programming that enhance their quality of life. NYCHA is currently one of four agencies hiring New Yorkers to beautify public spaces and parks via the City Cleanup Corps (NYC CCC). NYC CCC complements the Blueprint/Transformation Plan by creating jobs to help keep NYCHA's grounds, playgrounds, and buildings at NYCHA developments clean and well maintained, and assist with NYCHA's pest control work through the cleaning of compactors, collapsing rat burrows, and installing /fixing door sweeps. NYCHA is hiring for multiple NYC CCC positions including: Grounds Maintenance Aide, Playground Maintenance Aide, Floor Care Aide, Pest Control Aide, Community Projects Aide, and Resident Association Aide. As of 8/9/21, a total of 1,125 workers were hired, of which 47.7% are NYCHA residents.

- At Berry Houses, NYCHA staff fails to clean the staircase, floors, and compactor entrances. The hallways are no longer painted regularly. People deal drugs in the hallway. When will these issues be resolved?

Caretaker staff are assigned daily to clean all the areas of the buildings and continue to address janitorial conditions as needed. Residents can report illegal activities to their Property Management staff who notifies the NYPD. Residents can also call the Customer Contact Center (CCC) at 718-707-7771 to report illegal activities, as well as NYCHA's Office of Safety and Security's 24-hour anonymous tip line at 212-306-7027 to report quality of life, safety, and security issues. NYCHA's Office of Safety and Security can also be contacted via email at ofss@nycha.nyc.gov.

- At Berry Houses, the windows have not been cleaned in 35 years, as the bars have not been removed from the windows in order to do so. According to staff, there is no key available to open the bars. When will the windows be cleaned?

NYCHA will review the public space glass (lobby glass and stairwell door glass) cleaning schedule at Berry Houses. Depending on the daily staffing, public space glass is cleaned at a minimum of twice a week. To report any janitorial concerns, including public space glass not being cleaned, please call the Customer Contact Center (CCC) at 718-707-7771.

Apartment windows are cleaned in the initial moveout process. All apartment windows have window guards installed with tamper proof tri-wing screws. NYCHA maintenance workers do

not clean apartment windows or remove window guards due to safety concerns for the resident.

- NYCHA employees are not cleaning Hammel Houses' buildings for weeks at a time.

Caretaker staff are assigned to clean the buildings daily. Any issues found during the daily cleaning should be addressed by staff immediately. If there is a staff shortage, caretakers work on a modified task-based schedule. This modified schedule ensures that the buildings are swept, lobbies are mopped, staircases are spot mopped, and bulk debris is removed. To report any janitorial concerns, including the unclean conditions, please call the Customer Contact Center (CCC) at 718-707-7771.

- NYCHA needs to create a plan that improves the upkeep of the grounds and handles waste (trash) consistently. When and how will NYCHA address this issue?

The Waste Management Department has been working with the Federal Monitor Team to develop a scorecard to assess the interior and exterior grounds and assign a grade to the development. The goal is to have each development inspected monthly for cleanliness, track the results, and follow-up with properties that are not improving to address their issues.

Additionally, NYCHA is in the process of finalizing Individualized Waste Management Action Plans for its portfolio of properties which include 1,080 action items that are currently being categorized strategically for short-, medium- and long-term follow-up.

- NYCHA staff no longer seem to take pride in their work. Garbage is piled up outside of each building each day, and dog feces are everywhere. This is the product of the tenants, but there should be a fine or something to deter them from leaving garbage everywhere. Something must be done, such as a fine or other measure, to deter residents from leaving garbage and dog excrement outside.

Changing resident behavior is the cornerstone towards improving and maintaining the overall quality of life for the long term. NYCHA is launching a Campaign for a Clean NYCHA in five Pilot developments to improve past poor behavior that negatively contributes to poor quality of life such as throwing trash out of windows and not cleaning up after pets. NYCHA will use what we learn from these Pilot developments to create a NYCHA-wide clean campaign. Improper disposal of waste, throwing waste out of windows, and not cleaning up after pets are lease violations. Residents that are found in violation will be reminded of their lease agreement and given progressive warnings before lease termination is recommended.

- Many of NYCHA's issues originate from the local developments and local management, and stem from a lack of accountability. NYCHA's Transformation Plan also does not contain accountability measures. Lack of accountability has an impact on residents' quality of life, as well as their safety and security.

We recognize this issue and accountability is a key goal of the Transformation Plan. However, it must start at the property by setting new standards for performance and holding staff accountable to those standards. One example is through the revised Alternative Work Schedule (AWS) program. Caretakers and Supervisors need to be held to a uniform standard of cleanliness and NYCHA needs to ensure the resources are in place to achieve those standards before we can have true accountability. Each change in the Transformation has accompanying accountability measures to ensure work is done to new elevated standards.

- The Neighborhood Model is the same as it was, just with more supervisors and more rules.

The Neighborhood Model is not at full implementation yet. It will, in fact, include more supervisors and more rules, as NYCHA needs to increase accountability at every level of the organization. As we roll out more changes to roles, responsibilities, and expectations, we anticipate a more noticeable change to the day-to-day resident experience.

- 1. NYCHA needs to hire more staff and hire people who are motivated to get the work done. As it is now, NYCHA is overloaded with work orders and tickets, and does not have enough staff to complete the needed work. Some NYCHA maintenance workers do not want to do their jobs, and when residents express their concerns to their Management Office, they are not helpful.
- 2. Some NYCHA developments are very short staffed, and workers are told to maintain more than two buildings at one time (and for one worker at Queensbridge North, as many as 10 at one time).
- 3. NYCHA switched the Caretaker J title schedule to meet demands for repairs, even though this title has nothing to do with repairs. This was a cover-up by NYCHA and the Mayor to fool people. Due to the change in schedule, some workers were forced to quit. Since the schedule change, cleanliness in the buildings has gone down, as workers are made responsible for the workload of two or three people.

RESPONSE (1 –3): In order to help resolve the Work Order issues mentioned above, NYCHA’s Transformation Plan includes planned Work Order Reform. This is taking shape in the form of:

- *Moving skilled trades (e.g., painters, plasterers, carpenters, plumbers, and electricians) from the borough level to the Neighborhood level, ensuring that staff are not spending a lot of time traveling between work sites.*
 - *Changing the process for scheduling complex work orders: Maintenance Workers will schedule the necessary skilled trades when first visiting the apartment, so that the resident can plan for these future appointments and employees can easily communicate about scheduling and completing the work.*
- 1. NYCHA needs to respect schedules for planned repairs. Residents waiting for unfulfilled repair appointments have lost employment due to missed work.
 - 2. NYCHA needs to respect residents’ requests to reschedule repairs when no adult will be present in the home. How are residents meant to address this issue?
 - 3. NYCHA needs to address court order work repairs on time.
 - 4. Why do repairs take so long? The apartments at Ravenswood Houses are in such bad condition. The buildings need more cleaning and there needs to be better communication with office staff.
 - 5. Residents have sinks and cabinets removed for plaster work, with no return of the equipment for at least 30 days.

- 6. NYCHA maintenance workers continue to show up to apartments with zero notice. When residents are not present, their work orders are then closed out, and no follow up happens from NYCHA unless the resident then contacts one of their local Elected Officials.

RESPONSE (1–6): NYCHA’s Work Order Reform project is designed to address the work order issues mentioned above. Work order reform will benefit residents by increasing the efficiency of repairs portfolio-wide in order to deliver residents timely and high-quality service. Skilled trades workers will be on site so that they can work in a team to better address the entirety of the repair, and by ensuring higher rates of resident home by allowing the residents to schedule all appointments at once at a time which is convenient for them. By increasing resident trust in and familiarity with maintenance workers and skilled trades who are to be located at the development level, we help rebuild confidence in the Authority. Some of the key aspects of work order reform include but are not limited to:

- *Moving skilled trades (e.g., painters, plasterers, carpenters, plumbers, and electricians) from the borough level to the Neighborhood level, ensuring that staff are not spending a lot of time traveling between work sites.*
 - *Changing the process for scheduling complex work orders: Maintenance Workers will schedule the necessary skilled trades when first visiting the apartment, so that the resident can plan for these future appointments and employees can easily communicate about scheduling and completing the work.*
 - *Implementing system changes to provide maintenance workers, skilled trades, and residents with easily navigable tools to track work orders for the entire repair process.*
 - *Creating performance dashboards to track work order completion time as well as employee performance.*
- NYCHA must resume pre-COVID operational capacities and address the existing work orders that have been backlogged due to COVID.

Since the beginning of the COVID-19 pandemic, NYCHA has modified our business practices to reduce health risks to our employees and residents and to align with guidance provided by the NYC Health Department, Executive Orders, and other mandated protocols issued by our State and local officials and federal partners. As we learn more about the coronavirus and with significant increases in vaccinations, these entities have modified restrictions in order to slowly return life to pre-pandemic activity.

In response, NYCHA will be taking steps to return our business operations to pre-pandemic levels by rescinding some aspects of the “Work Order Guidance,” effective May 3, 2021. One of the major changes is that all work in occupied units, including scheduled repairs for non-emergency work, annual inspections and other skilled trades or maintenance work, is no longer suspended.

- Rather than doing patchwork repairs which result in things breaking soon after they’re fixed, NYCHA should replace things such as hopper doors.

As of August 2021, a total of 70 hopper doors at 61 buildings at 10 different developments were replaced. The hopper doors were replaced at 45 Allen, Baruch, Gompers, Lower East Side I Infill, Riis, Seward Park Extension, Two Bridges URA (Site 7), Wald, Hernandez, and Vladeck II. An additional 45 hopper doors will be replaced at 42 buildings at 10

developments, including: *Morris II, Morrisania, Monterey-East 181st St, Clinton Houses, Riis II, Borinquen I, Borinquen II, Hylan, 303 Vernon Ave, and Roosevelt II. As of September 2, 2021, this project is in procurement.*

- What is NYCHA’s strategy for waste management in PACT developments? NYCHA is advancing a \$563 million plan to upgrade waste infrastructures across its portfolio. NYCHA should ensure comparable waste infrastructure upgrades at all PACT sites, especially since it is NYCHA that ultimately retains ownership over all PACT buildings.

NYCHA’s Capital Projects Department takes several steps to help address waste management at PACT developments. Once a development transitions to the PACT program, the PACT teams must submit a waste management plan with proposed waste and recycling equipment upgrades and operational changes to address waste issues. NYCHA created a Waste Management Handover guide to provide basic site information, waste pickup information, and noted shared infrastructure, such as central waste yards that are utilized by multiple developments and other details to ensure a seamless handover for dealing with waste management. NYCHA reviews, discusses and ultimately signs off on the PACT developers’ approach for waste management.

Designated Housing for Elderly and Disabled Families

- Seniors reside in every NYCHA development. If NYCHA is conducting hearings or meetings on Zoom, NYCHA needs to ensure that all residents can join and participate.

When meetings occur on Zoom, residents are provided with a dial-in option that allows them to join the meeting by telephone.

- NYC needs more senior residences.

Thank you for your feedback. As of September 2021, NYCHA has 8,891 units in buildings originally constructed for, and intended to be occupied by, elderly families. These units are located in 38 “elderly-only” developments and 11 “elderly-only” buildings throughout the five boroughs of New York City. All of the units located in NYCHA’s “Elderly-Only Developments and Buildings” are in federally-aided public housing developments. There is a total of 1,634 zero bedroom [studio] units, 6,971 one-bedroom units, and 286 two-bedroom units.

Community Service and Self-Sufficiency

- NYCHA needs to better communicate to residents the opportunities which are available to them, such as ways in which they can apply to own their own home.

NYCHA’s Office of Resident Economic Empowerment and Sustainability (REES) help residents achieve financial security, instead of just making ends meet, through financial empowerment services. REES collaborates with service providers throughout New York City to help NYCHA residents achieve their financial goals, including homeownership attainment. For more information, please visit their website at <http://opportunitynycha.org/about-financial-empowerment/homeownership/>.

- Residents need to be educated on becoming an RMC [Resident Management Corporation] and a 501c3.

This is a consideration for future training opportunities.

- NYCHA should institute Resident Management Corporations and hire residents to do landscaping, cleaning, and work on the grounds to alleviate NYCHA. Residents deserve these jobs as an economic resource.

NYCHA's Office of Resident Economic Empowerment & Sustainability (REES) connects residents to economic opportunity services in the areas of employment and advancement, adult education and job training, financial literacy and asset building and resident business development. Additionally, REES administers the NYCHA Resident Training Academy (NRTA), which is funded by the Robin Hood Foundation and provides employment-linked training and job placement assistance to NYCHA residents in the construction, maintenance, and janitorial fields. Most NRTA graduates secure employment with NYCHA, a NYCHA vendor or a union apprenticeship partners post training. To date, over 3,000 residents have completed the NRTA with nearly 2,700 obtaining employment post-graduation. Separately, NYCHA is a participating agency in the 2021 Mayoral City Cleanup Corp (CCC) initiative, employing over 1,000 additional staff members for the season. To date, more than 45% of CCC hires are also NYCHA residents.

- There is a lack of jobs for NYCHA residents in construction and operation of their facilities, seen most recently in the resiliency work currently under construction throughout district 74.

As noted in the response above, NYCHA's REES connects residents to employment opportunities and administers the NRTA. NYCHA also administers the Section 3 program in alignment with HUD's policy. In 2020, there were 328 Section 3 hires on NYCHA Section 3 covered contracts. NYCHA secured \$1.4million from HUD to create a Sandy Pre-Apprenticeship program that targets residents of Sandy impacted developments to provide training and a connection to NYC construction unions. To date, this has resulted in 15 classes being held with over 220 graduates. Overall, since 2014, over 984 Section 3 hires have worked on the Sandy recovery program on contracts related to Recovery and Resiliency work.

- NYCHA is not Section 3 compliant. There is still not a written plan and/or policy in place for Section 3. NYCHA needs to put together a more detailed Section 3 plan, including what NYCHA's role is and the dollar value that Section 3 is worth to the community.

NYCHA issued an interim Section 3 Standard Procedure in June 2020 and trained staff in the summer 2020. HUD's new rule on Section 3 took effect in November 2020. NYCHA is updating its Section 3 procedures to align with the new rule and will provide the needed staff training. NYCHA's revised Section 3 FAQ's based on the new rule can be found here: <https://www1.nyc.gov/assets/nycha/downloads/pdf/section3-faq-2021.pdf.%20>

- NYCHA and REES have posted Section 3 notices at South Jamaica Houses which do not comply with the current Section 3 clause.

As part of HUD's Section 3 policy, contractors are responsible to conduct their own outreach to secure qualified Section 3 residents for their employment opportunities. NYCHA's Office of Resident Economic Empowerment & Sustainability (REES) may assist contractors with their

outreach and will source qualified NYCHA candidates to contractors for their consideration. REES' outreach is aligned with HUD's Section 3 policy.

- Who are CCOP, Resident Advisory, Resident Roundtable? They do not represent the residents of NYCHA. Ninety-nine percent of NYCHA residents do not know who they are. They have not brought information about these plans to the majority of NYCHA residents. How can they speak for the residents when they do not talk to the residents?

The Citywide Council of Presidents (CCOP) is the jurisdictional-wide resident council. Per HUD regulation, resident councils may come together to form an organization which can represent the interest of residents residing in units under a housing authority's (HA's) jurisdiction. This can be accomplished by the presidents of duly elected resident councils forming an organization, by resident councils electing a representative to the organization, or through jurisdiction-wide elections. If duly elected resident councils form such an organization, the HA shall recognize it as the voice of Authority-wide residents for input into housing authority policy making. For NYCHA, the CCOP (jurisdictional-wide resident council) is currently formed by elected representatives of nine geographical districts.

The role of the Resident Advisory Board (RAB) is to assist and make recommendations regarding the development of the PHA Annual Plan, and any significant amendment or modification to the PHA Annual Plan. Per HUD regulation, if a jurisdiction-wide resident council exists, housing authorities must appoint the jurisdiction-wide resident council or the council's representatives as the Resident Advisory Board. For NYCHA, the RAB is currently comprised of the CCOP and its designees.

The Resident Roundtable consists of NYCHA residents who applied to work with NYCHA on the Transformation plan. The Resident Roundtable members are required to conduct outreach to residents at NYCHA neighborhood clusters to solicit feedback on policies and procedures that NYCHA is transforming specific to the Transformation Plan. The Resident Roundtable consists of 32 residents, including two Section 8 residents and five resident council Presidents.

- Who are these 32 residents in the Resident Roundtable?

Information about the Resident Roundtable – including the names of each member and the Neighborhood Portfolio they represent and meeting materials – can be found on NYCHA's website, here: <https://www1.nyc.gov/site/nycha/residents/resident-roundtable.page>.

- Is NYCHA trying to get rid of or reform the Resident Council? If so, how? It seems as if NYCHA is trying to put other people in control, rather than letting the Resident Council be in control.

NYCHA is not trying to get rid of resident councils. HUD and NYCHA promote resident participation and the active involvement of residents in all aspects of a NYCHA's overall mission and operation. Residents have a right to organize and elect a resident council to represent their interests. NYCHA recognizes the duly elected resident council to participate fully through a working relationship with the NYCHA.

- The CCOP wanted more than two candidates for the Resident Board Member positions. Why did NYCHA only agree to 2?

The composition of NYCHA's Board is set by state law. As per N.Y. Public Housing Law § 402(3), three of the seven Board members must be residents. The City's Mayor appoints all seven Board members, including the three resident Board members.

- All residents—beyond just the resident leaders and CCOP—must have a seat at the table when plans are considered. NYCHA must do a better job explaining its plans to residents so that everyone understands what is going on and can participate.

NYCHA is always examining ways to increase resident participation, involvement and input on issues that impact the quality of life at NYCHA developments. As an example, we solicited direct resident feedback on NYCHA's Transformation Plan during an open comment period and incorporated the comments received into the final plan before submission to HUD and the Federal monitor for approval.

- The FY22 Draft Annual Plan continues to leave out detailed and thoughtful strategies around improving tenant engagement and leadership particularly during this time when folks are still stuck at home.

NYCHA is open to suggestions. Please email annualplancomments@nycha.nyc.gov to provide any suggestions for improvement.

- NYCHA must improve its engagement and transparency. There were several speakers at the public hearing on July 27th who relayed over and over again that residents have not been brought into the process of determining what's best for NYCHA residents. Oftentimes when plans such as RAD/PACT/Blueprint are presented, these are proposals already shaped by the agency with no involvement from the people who would be going through these plans firsthand.

As background, the CCOP is a resident advocacy organization comprised of resident association presidents. Every president of a recognized resident association is a member of one of nine CCOP districts, and RA presidents from each district elect a chair to represent their district on the CCOP.

NYCHA works closely with the Citywide Council of Presidents (CCOP) and duly elected resident leadership at the start of planning for new initiatives and plans as required by the HUD regulations. NYCHA and the CCOP recently signed an agreement that officially recognizes the CCOP as the Authority-wide voice for residents and its role in providing input across all areas of NYCHA's policy making and operations. While the CCOP has long worked with NYCHA on issues affecting residents at their developments, this is the first time NYCHA and CCOP have had an official agreement since 1993.

In January 2020, NYCHA's Office of the Chair, Resident Engagement Department, Law Department, and CCOP members began meeting to discuss a new agreement and the desired terms. These meetings paused due to the COVID-19 pandemic but were resumed virtually in November 2020.

The new agreement, signed by the CCOP Chairman and NYCHA Chair and CEO, establishes how NYCHA and the CCOP will work together to increase resident participation and bring the issues that are most important to residents to the forefront of our work. It also outlines

how we will share information and sets standards for communication between NYCHA and resident leadership at every level of the Authority. Training on the details of the new agreement is currently in development for NYCHA employees and resident leaders.

- NYCHA needs to give proper and tenant-friendly notification to residents. NYCHA needs to educate residents about things that are expected to take place, including younger residents that may be less aware about what's going on.

We anticipate significant improvement in this area through implementation of the Transformation Plan.

- NYCHA needs to do a better job reaching out to residents who are not computer literate.

NYCHA is open to suggestions. Please email annualplancomments@nycha.nyc.gov to provide any suggestions for improvement.

Safety and Crime Prevention

- Will ex-convicts (regardless of their crime) be returning to NYCHA?

NYCHA is committed to improving policies that keep employees and residents safe while addressing the challenges faced by justice-involved applicants and residents, as well as their family members. Based on our unprecedented success in the NYCHA Family Re-Entry program, which reviews and evaluates requests to join the household from formerly incarcerated persons who have recently been released, we are aligning our policies and procedures to be more inclusive to allow families to reunite, and for justice-involved individuals to become productive residents and community members. NYCHA evaluates these individuals on a case-by-case basis. Please note that federal law continues to prohibit housing authorities from admitting registered sex offenders or those who were convicted of producing methamphetamine in federally-assisted housing.

- At Berry Houses, residents live with the smell of marijuana smoke, which is smoked inside the building and makes some residents feel sick. Those smoking tobacco must do so outdoors, or risk being ticketed. It is unfair that those smoking marijuana may do so indoors without repercussions.

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. Smoking in these areas is a violation of the public housing lease. NYCHA's Smoke-Free policy does not currently address secondhand marijuana smoke.

On March 31, 2021, Governor Cuomo signed a bill that legalizes adult recreational use of marijuana in New York State and makes additional policy changes with regard to marijuana. NYCHA is currently analyzing this change in state law and will propose modifications to its smoke-free policy as needed.

On June 29, 2021 NYCHA's Health Initiatives Department hosted a Community Conversation on Secondhand Marijuana Smoke and Health. NYCHA will continue to work with community

leaders, health experts and other stakeholders to help create healthier homes for residents by reducing exposure to secondhand smoke.

- Maintenance workers are paying homeless and drug-addicted individuals to do the work for them, while they mingle and do not do their work. This needs to be addressed.

This behavior, as reported, is not to be tolerated. NYCHA requires and seeks to encourage feedback from residents as part of our effort to address conditions in a timelier manner. Any such occurrence should be reported to Property Management immediately in order to conduct an investigation and potentially take the appropriate disciplinary actions where verified. No resident should hesitate to report any concerns to staff for resolution. Residents can also contact NYCHA's Office of Safety and Security's 24-hour anonymous tip line at 212-306-7027 to report quality of life, safety, and security issues. NYCHA's Office of Safety and Security can also be contacted via email at ofss@nycha.nyc.gov.

Progressive discipline is recommended to respond to continued issues with performance, with the goal of correcting the behavior. If the behavior remains unchanged after progressive disciplinary steps, the final step would be for the supervisor to request a General Trial (if the employee has due process rights).

- NYCHA needs to have and enforce rules such that residents who are destroying and vandalizing property may not remain at NYCHA. As it is now, when complaints are made to NYCHA management about issues such as noisy neighbors playing music late into the night, nothing is done.

When NYCHA is made aware of issues such as vandalism and noise violations, property management refer such complaints to the Law Department for appropriate action.

- NYCHA must ensure that tenants and their children don't throw things out of windows. A law should be put into place where window shield should be on each window. Parents are leaving their kids unattended and they are throwing things out and hurting other kids that are outside.

Although NYCHA follows the law and requires window guards on windows of a household with a child age 10 or younger, the initial responsibility is that of a parent or guardian to ensure that a young child does not throw things out of a window.

Tenants who observe or have knowledge of unsupervised children or improper disposal of garbage should contact their Property Management office to advise the office of the issue. Complaints can be reported anonymously.

- What is NYCHA going to do about the tenants who are constantly smoking and doing drugs in the hallways?

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. Smoking in these areas is a violation of the public housing lease. 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. Residents and staff may report violations by calling the Customer Contact Center. Property Management

will begin enforcement when one violation is reported by a NYCHA staff or three violations within a 30-day period are reported by residents. Residents who violate the probation are at risk of having their tenancy terminated.

NYCHA's Smoke-Free policy does not currently address secondhand marijuana smoke. On March 31, 2021, Governor Cuomo signed a bill that legalizes adult recreational use of marijuana in New York State and makes additional policy changes with regard to marijuana. NYCHA is currently analyzing this change in state law and will propose modifications to its smoke-free policy as needed.

On June 29, 2021 NYCHA's Health Initiatives Department hosted a Community Conversation on Secondhand Marijuana Smoke and Health. NYCHA will continue to work with community leaders, health experts and other stakeholders to help create healthier homes for residents by reducing exposure to secondhand smoke.

Residents can report illegal activities to their Property Management staff who notifies the NYPD. When NYCHA is made aware of a breach, such as a tenant doing drugs which is prohibited, the Property Manager will call in the tenant to discuss the matter. If the tenant will not resolve the breach, the matter will be referred to the Law Department to schedule an administrative hearing. Residents can also contact NYCHA's Office of Safety and Security's 24-hour anonymous tip line at 212-306-7027 to report quality of life, safety, and security issues. NYCHA's Office of Safety and Security can also be contacted via email at ofss@nycha.nyc.gov.

- Residents must make appointments and do other needed tasks early in the day so that they can return to their apartments and lock their doors before dark. What is NYCHA doing to address increasing security concerns?

NYCHA has upgraded enhanced lighting throughout its development portfolio.

- Security cameras should be installed in elevators and in hallways on each floor and on NYCHA grounds in order to curb illegal dumping, crime, drug deals, vagrancy, and vandalism.

Cameras have been installed in elevators and on the grounds at NYCHA developments. Based on the latest data available, there are 17,693 CCTV cameras at 214 NYCHA developments. Security cameras are not installed in the hallways, as it is an invasion of privacy.

- Cameras should be installed so that it is clear who is throwing trash out of windows.

As of September 2021, NYCHA is currently reviewing the latest technology options available to address this concern.

- Dewitt Clinton Houses experiences major security concerns such as broken intercoms, exit doors which need locks to be replaced, and garage lights not working properly. Drug addicted people are coming inside, defecating, throwing garbage on the floor, and exiting leaving doors open. The current NYCHA budget does not include safety and security measures to address these issues.

Based on the latest data available, there are 27 CCTC cameras at Clinton Houses. If residents are experiencing security concerns, NYCHA's Office of Safety and Security can be contacted at (212) 306-8800 or emailed at ofss@nycha.nyc.gov. Residents can also contact NYCHA's Office of Safety and Security's 24-hour anonymous tip line at 212-306-7027.

- PSA4 does a poor job working with their NYCHA community. How is NYCHA working to improve the relationships with local PSAs?

NYCHA's Office of Safety and Security has daily conversations with NYPD for their awareness and response to ongoing community issues.

- Better safety and security are needed at NYCHA. At a building in South Jamaica Houses, the doors get locked, but the intercom doesn't work. The building is connected to another building, and drug addicts come in and sleep on the roof landing.

If the lobby doors and/or intercom are broken at your development, please call the Customer Contact Center (CCC) or alert your management office to request these repairs and report any criminal activity. Any criminal activity reported to the management office will be escalated to NYCHA's Office of Safety and Security and/or the New York City Police Department.

Residents can also contact NYCHA's Office of Safety and Security's 24-hour anonymous tip line at 212-306-7027 to report quality of life, safety, and security issues. NYCHA's Office of Safety and Security can also be contacted via email at ofss@nycha.nyc.gov.

- Does NYCHA have overnight-hours contact information for safety purposes for those who are deaf and hard-of-hearing?

NYCHA's Office of Safety and Security can be contacted at any time (212) 306-8800 or emailed at ofss@nycha.nyc.gov.

Fiscal Year Audit

- Has NYCHA completed a full financial audit? When was the last time NYCHA had a forensic audit? Resident Leaders should be informed of where money has been spent, as well as NYCHA's plans to ensure that money is not misused again in the future.

HUD does not require NYCHA to have a forensic audit. NYCHA prepares an annual financial audit in accordance with 24 CFR 902.33 and a single audit in accordance with the requirements of Title 2 U.S. Code of Federal Regulations, Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and HUD Uniform Financial Reporting Standards. The Authority's 2020 financial audit was completed, and the 2020 financial statements have been audited by independent public accountant, Deloitte & Touche LLP. The independent audit involved performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditors' judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal controls relevant to the Authority's preparation and fair presentation of the financial statements in order to design audit

procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal controls. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements. The 2020 annual report is available for review here: https://www1.nyc.gov/assets/nycha/downloads/pdf/NYCHA_2020_Comprehensive_Annual_Financial_Report.pdf

Disposition/Conversion of Public Housing/Homeownership/RAD/PACT

- Why aren't FHA Homes residents ever included or mentioned during the public hearing or other meetings? It is unfair and unjust. The residents want their homes. NYCHA must be fair and include the residents living in FHA Homes in these conversations.

NYCHA does not exclude any residents from attending its public meetings. Where plans exist for the FHA properties, NYCHA includes details in the Annual Plan and briefings to the RAB.

- On January 18, 2021, Chairman Greg Russ and other NYCHA staff met with La Guardia tenant stakeholders in the Lower East Side and made it very clear that Build to Preserve would not be happening on their campus. In the FY22 Draft Annual Plan, it is still listed as a Build to Preserve Project. We ask that it be removed.

La Guardia was previously considered for the Build to Preserve program and was accordingly included in previous Annual Plans. However, NYCHA is not actively working on this project. We will reach out to resident leaders when we are ready to engage further.

- A trust can be formed for the residents to invest in their own apartments. There are civil service workers that have been in their apartments for 20, 30, 40 and more years. Why can't they invest in their own apartments? Those residents that are interested should be able to invest in their apartments and build equity.

The size and condition of NYCHA's buildings require substantial capital investments that go beyond the scope of what an individual household can support.

We appreciate your feedback about financial empowerment and homeownership and would note that NYCHA's Office of Resident Economic Empowerment and Sustainability (REES) help residents achieve financial security, instead of just making ends meet, through financial empowerment services. REES collaborates with service providers throughout New York City to help NYCHA residents achieve their financial goals, including homeownership attainment.

- NYCHA should allow for housing funding sources in individual buildings to be mixed, including homeownership for some residents, Section 8 for others, etc. Before NYCHA seeks outside investment, NYCHA should give residents a mortgage and allow for them to invest in their own apartments. This would allow tenants to build generational wealth and start to close the income equality gap. Many NYCHA residents are civil servants who would be able to afford their apartments.

Thank you for your feedback. NYCHA does offer some affordable homeownership opportunities and coordinates access to home-buying education programs for NYCHA residents. We will take your suggestions about financial empowerment into consideration.

- Which buildings are under RAD and which are under the Blueprint for Change? The trust is public, but are there private developers under the RAD approach?

NYCHA publishes the full list of properties in the PACT program through an interactive map and a printable list on the PACT website which can be accessed at <https://www1.nyc.gov/site/nycha/about/pact.page>. The list is updated regularly and includes all the properties that have converted and their PACT Partners as well as the properties where residents are learning about PACT and preparing for conversion.

The Blueprint for Change still requires State legislation to create the Trust, the public benefit corporation that will make improvements to the properties; therefore, no properties are participating under the Blueprint program at this time.

- Are all of the repairs, as well as terms and conditions that are in store for apartments under the Blueprint for Change the same for the units that will be under RAD? If not, what are the differences between the two approaches?

With both initiatives, residents maintain their full rights and protections, including rent capped at 30 percent of household income. Both programs keep NYCHA as the fee owner of the buildings and the land by using a 99-year ground lease. With the Trust model under the Blueprint for Change, the public Trust is the leasehold owner of the buildings and the land and oversees the capital repairs/improvements and NYCHA remains the property manager. With PACT/RAD, a public-private partnership is the leasehold owner of the buildings and the land and rehabilitates and manages the properties.

The PACT repairs process is as follows: 1) repair needs are assessed by inspectors and with input from resident leadership, 2) rehabilitation is planned using resident feedback and HUD approval, and 3) repairs are conducted over the course of 18-36 months while residents remain at home. (Individual residents may be moved to temporary, furnished apartments within the development if needed.) Building structures (roofs, exterior walls, and windows), common spaces, apartments, energy and systems (including wiring, elevators, boilers, plumbing, and water heaters), and the development's site and grounds will all be assessed for needed repairs and investment. More information about the PACT repairs process may be viewed here: <https://www1.nyc.gov/assets/nycha/downloads/pdf/PACT-Design-Construction-English.pdf>

- Not all residents qualify under the Section 8 income limits. What will happen to those families?

NYCHA residents whose developments are converted under PACT have the right to remain and will pay 30% of their adjusted gross household income towards rent.

- A large portion of NYCHA's residents are seniors. What will happen to seniors if they live in a converted Section 8 units which is not funded, and who cannot afford to pay market rent?

All NYCHA residents whose developments are converted under PACT will pay 30% of their adjusted gross household income towards rent.

- As mentioned during the July 27 Public Hearing, Chair Russ stated that apartments would be held for “low, low, low-income residents”. What about middle-income residents? Will they be pushed out?

All NYCHA residents whose developments are converted under PACT have the right to remain regardless of their income and will continue to pay 30% of their adjusted gross household income towards rent.

- NYCHA buildings are over 70 years old. According to Section 18 demolition, when the renovation costs more than the cost to demolish, then the building must be demolished. Rather than conducting patchwork repairs and renovating with residents in place, NYCHA should demolish and replace buildings one at a time, buying/leasing hotels/motels in order to house residents while their buildings are being renovated. When residents return to the building, they should also have the opportunity for home ownership.

Section 18 does not mandate demolition and from our engagement with residents to date, we have heard that some residents are fearful of demolition. At this time, NYCHA is not considering demolishing any developments. We will continue to work with residents of the impacted developments to ensure they are meaningfully informed and involved in the decision-making process.

Most PACT renovations are completed with residents in place. However, if there is hazardous work taking place, extensive repairs that render the unit temporarily unavailable, or if a resident does not feel comfortable at home due to a health concern or disability, PACT partners make furnished hospitality units available within each development. Partners assist residents with any temporary moves and pay for all expenses during the process.

- NYCHA needs to share its relocation plans for those residents who will need to temporarily leave their apartments being renovated/rehabilitated. Where will the tenants be relocated during PACT projects, and during any demolitions that may take place in the future?

Most PACT renovations are completed with residents in place. However, if there is hazardous work taking place, extensive repairs that render the unit temporarily unavailable, or if a resident does not feel comfortable at home due to a health concern or disability, PACT partners make furnished hospitality units available within each development. Partners assist residents with any temporary moves and pay for all expenses during the process. At this time, NYCHA is not considering demolishing any developments.

- Tenant Protection Vouchers are intended to protect tenants from living conditions that are inhumane. This means that NYCHA has to prove that residents’ homes are so bad that the government has to step in. This is the reason why residents aren’t getting any repairs. NYCHA has to convince HUD that residents are threatened by their homes, labeling them obsolete so that HUD provides Tenant Protection Vouchers to save residents from NYCHA’s negligence. Why is this NYCHA’s strategy?

Capital investments for NYCHA public housing are funded annually by Congressional allocations. For the past several decades, funding for public housing has been on a steady

decline. This has resulted in properties that are in serious disrepair across the country and considered obsolete by HUD's standards.

In cases where the rehabilitation is extensive, HUD offers a higher-value Section 8 funding stream (through the Tenant Protection Voucher) which enables NYCHA and its development partners to leverage more private debt and equity, which are needed to fund repairs in many of NYCHA's highest-need developments.

- Tenants need to be made aware if their development is going to be converted through PACT/RAD.

Our new engagement process starts much earlier than in the past and includes frequent touchpoints throughout the process – before and after conversion. We mail selected materials—including a welcome letter, PACT info sheet and a presentation deck for the first resident meeting—to every household in the development. Materials are available in the primary languages spoken at the development and as required by fair housing. We also conduct phone-banking to every phone number we have on record, inviting residents to upcoming meetings and answering questions about the PACT program. We also host monthly PACT information sessions so any resident or member of the community can learn more about PACT and get their questions answered at times that are convenient for them.

- NYCHA residents should be able to give input on whether or not RAD/PACT would benefit their building, and whether or not RAD/PACT conversion should take place.

We agree that information-sharing and clear communication are key factors to the success of PACT. We also agree that residents must be meaningfully engaged in planning for the future of their homes and communities. With those tenets in mind, and to ensure our PACT investments achieve community goals and priorities, NYCHA is making improvements to the PACT program and developing new processes which engage residents in shaping plans and addressing ongoing issues at the properties earlier, more frequently, and more directly. Our new engagement process starts much earlier than in the past and includes frequent touchpoints throughout the process – before and after conversion.

- Residents' lived experiences should be weighted equally with the "data" when completing needs assessments. Residents' experiences need to be factored into this equation.

We agree that lived experiences are important and we factor in resident feedback into the assessment of the property's needs.

- Communication paired with stakeholder engagement is very important. NYCHA should replicate the extensive resident engagement process from the Chelsea Working 2 Group at as many PACT/RAD projects as possible, such as at the WSUR Brownstones on the Upper West Side, which is listed in the Draft PHA Plan under "Developments Under Consideration by HUD for Future Section 8 Conversions." While the timing of the conversion depends on when HUD authorization is granted, now is the time to begin a comprehensive stakeholder engagement process. These brownstones are very different from NYCHA's other large-scale campuses; they are also extremely valuable and must never have even the slightest possibility of leaving NYCHA ownership. The WSUR Brownstones President will fully engage with NYCHA. However, no one from NYCHA has communicated to her that the WSUR

Brownstones are designated for PACT; she only learned about it from reading NYCHA's FY22 PHA Plan.

These properties were previously considered for the PACT program and were accordingly included in previous Annual Plans. However, NYCHA is not actively working on these projects. We will reach out to resident leaders when we are ready to engage further.

- NYCHA's Annual Plan proposes continued conversion of developments through RAD/PACT when there has not been a real evaluation of the RAD/PACT plans that have gone through thus far. Several conversions through RAD/PACT have resulted in changes and displacement, and yet there has not been an evaluation of the program.

There is no permanent displacement because of PACT conversion. In most cases, repairs have been completed with residents in place.

Regarding the evaluation of the program, NYCHA and our key financing partner, the New York City Housing Development Corporation, both monitor construction throughout the rehabilitation process to ensure our Partners are completing the full extent of the PACT scope of work. NYCHA's Asset Management team also monitors the maintenance of the properties during and after construction to ensure that our Partners are addressing underlying issues safely and responsively. Recently, NYCHA established a Post-Conversion Unit that will meet regularly with the Tenant Association leaders of converted developments to speak directly with residents about any ongoing issues.

- Is the implementation of Section 8 Public Housing ending Section 9 Public Housing as it stands now?

HUD oversees the federal distribution of subsidies for its public housing program (also known as Section 9) and Housing Choice Voucher program (also known as Section 8). While both are subject to Congressional allocations, they are standalone, separate HUD programs.

- Is there any truth to the rumors that NYCHA will be selling off buildings and developments?

No, and with respect to PACT, NYCHA still maintains fee ownership of the land and buildings, units remain affordable and residents are not displaced because of PACT.

- NYCHA needs to communicate its privatization plans with residents. NYCHA may get less backlash if it was more transparent.

We agree that information-sharing and clear communication are key factors to the success of PACT. We also agree that residents must be meaningfully engaged in planning for the future of their homes and communities. With those tenets in mind, and to ensure our PACT investments achieve community goals and priorities, NYCHA is making improvements to the PACT program and developing new processes which engage residents in shaping plans and addressing ongoing issues at the properties earlier, more frequently, and more directly. Our new engagement process starts much earlier than in the past and includes frequent touchpoints throughout the process – before and after conversion.

Capital Improvements

- When are NYCHA's capital plan items which were meant to be started in 2020 but delayed due to COVID-19 scheduled to take place?

Due to COVID-19, the city issued a six-month moratorium on city-funded projects in May 2020. This delayed projects that were expected to start in 2020. However, after the lifting of the moratorium, the projects have been started as soon as possible.

- Formerly WSUR B (now DeHostos) is not listed in the 5-year Capital Plan as receiving funds related to elevators, waste, and pests, despite serious issues with all of the above at the development. How are buildings/developments chosen for capital repairs, and why is DeHostos not included in this list? Could NYCHA reassess DeHostos for capital needs and repairs?

DeHostos is in the City Action Plan to receive new interior compactors and a waste yard redesign. As of September 2021, project design is scheduled to start in late 2022.

- Dewitt Clinton Houses needs to have things fixed, including structural damage, the grounds and sidewalks, and hot water. Is Dewitt Clinton scheduled for any capital repairs?

Clinton is in the City Capital Plan and will receive roof replacements for all buildings under the Mayoral Roof Program. The Design Certificate to Proceed (CP) is currently under review by the NYC Office of Management and Budget. Once the CP is approved, NYCHA will start the design and construction of these roofs. Clinton is also in the City Action Plan to receive a waste yard redesign.

- Residents need to be more involved in making decisions related to capital assessment needs.

NYCHA agrees with this comment. In the previous Physical Needs Assessment (PNA), the inspection team interviewed NYCHA superintendents, property managers, and other maintenance workers who were on site. The inspection teams walk the development's campus with the development's staff and document any conditions they come across.

Moving forward and for the upcoming Physical Needs Assessment, the inspection team will also work with the Tenant Association Leaders and NYCHA's Resident Engagement Department to administer a survey to the residents of the developments inspected. Through the survey, NYCHA will collect resident feedback and document issues. The upcoming PNA will be conducted at 10% of NYCHA's developments and is expected to start in 2022.

- NYCHA should share its plans for improving the developments and grounds to support people with disabilities, including for those who are deaf and hard-of-hearing.

NYCHA's Capital Projects Division's new design standards for ground work includes the following measures to improve accessibility for residents with disabilities:

- *Accessible playground equipment for children with disabilities.*
 - *For example, NYCHA's Capital Projects Division has selected a specific piece of fully accessible play equipment for installation at Washington Houses and is planning to provide the same at Jefferson Houses.*

- *Ramps and accessible grounds for those with disabilities to help access outdoor space, including accessible parking lots.*
 - *Adding ramps for accessible parking spaces is a standard design component when a parking lot is redesigned. The Section 504 accessibility initiative is focusing on designing and installing accessible parking spaces at selected developments.*
- *Tactile surfaces and signs to alert residents when transitioning between two surfaces.*
 - *Currently tactile signage (such as braille) is commonly incorporated into interior public areas but not currently usually on exterior signage. This exterior signage, as well as tactile paving at curb cuts to aid the visually impaired detect when they are entering a street will be incorporated into the Design standards going forward.*
- *In addition, see answer below for accessibility equipment in new elevators.*
- Does NYCHA have any plans to add accessibility equipment for those who are deaf and don't hear, specifically in elevators? I would like to know if there are any planned building accessibility improvements for those who are deaf and hard-of-hearing. Specifically, how can an individual who is deaf or hard-of-hearing who is stuck in an elevator access help if they don't have their phone with them and can't hear? Those who are deaf and hard-of-hearing won't have a way of knowing when help may arrive if they are stuck on an elevator. Those who are deaf and hard-of-hearing also may not receive or see that a call has been put out saying that the elevator has gone out.

NYCHA's Capital Projects Division's new elevator replacement projects include the following measures as our design standards:

- *Digital Position Indicator at the Main Lobby Floor Entrance*
 - *A digital position indicator is a fixture that is located above or in the Lobby Floor (Street Level) entrance head jamb, which indicates the floor position of the elevator in the elevator shaft (i.e., floor its currently at or passing) and its direction of travel.*
- *Digital Position in the elevator cab*
 - *This is the same as above except the fixture is located inside the elevator cab above the cab door and the fixture also includes an automatic verbal annunciator which announces the floor at which the car is about to stop.*
- *Car Direction Lantern in the elevator cab,*
 - *The fixture has "UP" and "DOWN" arrows that will light up to show the direction the elevator will be traveling along with an audible signal which shall sound once for the "UP" direction and twice for the "DOWN" direction.*
- *Emergency Hands free phone with visual signal,*
- *Call register lights in all hall and car pushbuttons*
- *Braille Plates*

These measures are in addition to meeting all other ADA compliance requirements.

- Residents need to be more involved in making decisions related to capital assessment needs.

NYCHA agrees. The Transformation Plan includes the creation of a Resident Roundtable that ensures residents continue to play an important role for NYCHA's Transformation Plan, where they will provide valuable feedback and recommendations to implement the plan, which includes capital planning.

Blueprint for Change

1. NYCHA should create a new Annual Plan that is not based on the killed Blueprint legislation, that includes long term funding for Section 9, and that centers the needs of tenants.
2. NYCHA must seek reallocation of federal funding to Section 9 to address the inhumane living conditions that NYCHA tenants face, without privatizing public housing.

RESPONSE 1—2: The New York City Housing Authority (NYCHA) is dependent on Congressional appropriations for both the Section 9 (public housing) program and Section 8 assistance. Every day, we continue to advocate for any and all available resources — including additional Section 9 funding — as we confront our existing capital obligations, while strategically placing NYCHA on a better trajectory for the future. However, we also must acknowledge the harsh reality: that Congress has not fully funded public housing in approximately 40 years, and after decades of disinvestment, the need for rehabilitation both in New York City and across the nation has become dire. We have seen public housing in cities across the U.S. abandoned and falling into disrepair, and at NYCHA alone, we have a \$40 billion deficit that grows by approximately \$1 billion per year. Now is the time to take action or face even greater consequences.

As we comply with the objectives outlined in the January 2019 Agreement signed between NYCHA and the U.S. Department of Housing & Urban Development (HUD) and as we continue to move the Authority forward, we are exploring every viable option informed by feedback we have received from residents, elected officials and a wide variety of other stakeholders. With the Blueprint for Change, we are able to accomplish and emphasize many of the priorities identified in these conversations — such as keeping properties 100 percent public, maintaining tenant protections, increasing the federal subsidy we receive, improving and expediting repairs and renovations and leveraging available funds. As the City’s public housing authority, we have a responsibility to assess how we can successfully satisfy these goals. The Blueprint is a plan and framework for achieving these necessary fundamental shifts in operations and a multitude of other areas, while ensuring the same tenant protections as the traditional Section 9 Program.

3. The Draft Agency Plan is largely centered around the Blueprint for Change. Residents have been very clear at hearings, rallies, and resident-led meetings they do not approve of this plan for a number of reasons, including that it opens NYCHA and developments up to foreclosure.
4. NYCHA is attempting to make deals with private entities to have them take over management of public housing, to secure private investments with public housing (giving the investors the right to foreclose if the public entity cannot pay interest and principal), or to build privately-owned housing on the public authority’s playgrounds and open spaces. The fact that the draft plan for FY2022 includes all of the above strategies, despite resident opposition through the grueling months of the pandemic, demonstrates that NYCHA doesn’t care what residents and community stakeholders have to say about the future of NYC public housing. In doing so, NYCHA confirms that they are ignoring repeated resident protests against privatization.

RESPONSE 3—4: The goals in the Draft FY 2022 Annual Plan are based on the FY 2020 Annual Plan and the Five-Year Plan — the latter of which was submitted to HUD on October

18, 2019, before the Blueprint for Change was introduced. The FY 2022 Plan continues to build on NYCHA's efforts to strengthen and improve its business model, raise much-needed funding for capital and comply with the objectives outlined in the Agreement signed in January 2019 between NYCHA and the City of New York and HUD. Because conversations about the Public Housing Trust remain in progress, the FY 2022 Annual Plan does not include any further actions related to its establishment. We plan to reintroduce legislation for the Trust in the next legislative session.

Furthermore, developments that have undergone a Rental Assistance Demonstration (RAD) or Permanent Affordability Commitment Together (PACT) conversion are NOT privatized. Once converted, these developments still follow federal HUD regulations and remain under public control, while unlocking Project-Based Section 8 subsidy — a more stable, federally-funded program that enables comprehensive repairs. Again, all units in this program remain permanently affordable and residents have the same rights as in the Section 9 Program. These protections are mandated by HUD and documented in legal agreements. All stakeholder rights and responsibilities—including for NYCHA, residents, and PACT development partners—are detailed in the various legal documents that are signed at the time of conversion. These legal documents include the Control Agreement which incorporates the Principles for the Rental Assistance Demonstration: Supplemental Resident Rights and Protections under RAD Conversion, dated June 13, 2016 (the “RAD Roundtable Principles” which were crafted between NYCHA, resident leaders, and housing advocates) and the PACT Apartment Lease. We have made many of these legal documents available on our website at: on.nyc.gov/nycha-pact.

5. If the Blueprint was put on hold [by the NYS legislature], why the rush to push this plan [the Blueprint] into the [FY 2022 Draft] Annual Plan?
6. NYCHA must not enact the trust and must maintain the public ownership of housing. NYCHA must fully promote the construction of public housing and maintain the stability and prosperity of the community.
7. NYCHA's decision to proceed with the Blueprint for preservation, despite the decision of elected officials who are accountable to NYCHA residents and community stakeholders, is simply another example of its commitment to an undemocratic process for managing public housing. Having failed to convince the legislature to create the “Public Housing Preservation Trust,” NYCHA's insistence on “planning” a NYCHA future based on the Blueprint—without even bothering to propose an alternative in the event that the Trust is not approved—is tone-deaf, at best. NYCHA has wasted another year on its Blueprint pipe dreams and failed to present any viable preservation strategy to protect the public housing it is obligated to steward.

RESPONSE 5—7: We are at an inflection point in New York City. The longer we delay investment in our public housing, the greater the impact. Our objective is two-fold: we must simultaneously address the most pressing capital needs at hand, while laying the groundwork for NYCHA to build a better, stronger and more sustainable future — to the direct benefit of residents.

Recognizing the challenges at hand, the Blueprint identifies several different but complementary tools for helping to achieve these aims. While we have not stopped advocating for Section 9, we also understand that we cannot rely solely on this resource because the

federal government has not fully funded public housing through this program in four decades and may never do so again.

Every day, we are addressing maintenance issues (with a special focus on the concerns of the Federal Monitor) and converting Section 9 developments to Section 8 via our RAD/ PACT Program. In doing so, NYCHA has already converted more than 9,500 apartments and raised more than \$1 billion in funds toward repairs. NYCHA plans to convert 62,000 apartments in total and the Trust would build on these efforts. Conversations with legislators continue about the Public Trust, which is not included in the FY 2022 Draft. If implemented, the Trust would raise money the same way that other public institutions raise money, including the Metropolitan Transportation Authority (MTA), the City of New York and the Dormitory Authority of the State of New York (DASNY): by issuing bonds. This allows critical investments to be made in public infrastructure, with low risk and enormous benefit.

The Trust offers a solution that gets to the heart of the things that matter most to residents and other stakeholders. It would allow us to maintain developments as 100 percent public, while facilitating renovations, unlocking federal subsidy and leveraging funds in the same way local and state governments do for infrastructure projects such as bridges and critical facilities.

8. Much of [of the Draft FY22 Annual Plan] is based around the Blueprint plan. For example, the new NYCHA-approved governmental structure on page 23 [of the Draft FY22 Annual Plan] includes the Housing Preservation Trust. Legislative approval is required for the creation of the Trust, which has not happened yet. In June, legislators paused the passage of the bill from moving forward after pushback from NYCHA tenants, NYCHA stakeholders, and city and state elected officials. Notwithstanding the legal and political issues, the success of the Blueprint will require monumental changes to federal allocation of funds to HUD and regulations. To base so much of the Annual Plan around something that is not legal yet is incredibly misleading.

Again, the goals in the FY 2022 Annual Plan are based on the FY 2020 Annual Plan and the Five-Year Plan, which was submitted to HUD prior to the introduction of the Blueprint. In January 2019, NYCHA and the City of New York signed an Agreement with HUD to address key issues, including around the areas of lead, elevators, heat, mold, pests and inspections. The Blueprint is the path for instituting this change and bringing solutions directly to NYCHA buildings and the residents who live there.

9. Rather than planning for how to sell— or long-term, low-rent lease— our City’s essential public housing resources, NYCHA should return to the drawing board, and develop a new Annual Plan that plans for the future of public housing in collaboration with residents. With a massive influx of federal infrastructure funding around the corner, and with legislative majorities on the city, state, and federal levels all supporting preservation of public housing, NYCHA must re-imagine what preservation looks like—and must plan for essentials of dignified living for its residents, not simply the minimum repairs, but also community resources like playgrounds, schools, grocery stores and libraries. We will not preserve public housing and build a dignified future for public housing residents by leasing away public land and green space in NYCHA developments, and/or by transferring management to for-profit management companies who are not driven by NYCHA’s public service mission.
10. The Blueprint leaves us under the management of NYCHA. What will change under NYCHA’s supervision?

11. NYCHA's ongoing denial of the fact that the Blueprint, RAD/PACT, and private infill development on NYCHA's campuses are privatization is disrespectfully gaslighting NYCHA's residents.
12. Public housing funding must be transparent. It must be unlawful for private companies to profit off of public housing debt (as would occur as a part of the NYCHA Trust and Blueprint for Change).

RESPONSE 9—12: The current challenges NYCHA faces in permanently addressing its wide array of maintenance concerns are rooted in decades of disinvestment that have a linear connection to deteriorating conditions. Since signing the 2019 HUD Agreement, NYCHA has worked closely with the Federal Monitor to bring the authority into compliance and address fundamental issues surrounding heat, lead, mold, pests/ waste, elevators and inspections. Through the Blueprint, NYCHA seeks to change and improve operations and service delivery— while recapitalizing the entire portfolio and preserving public housing for future generations. These systemic changes will improve building conditions and will also forge a path forward for the continued maintenance of these buildings.

13. The Blueprint should not move forward until every tenant is made aware of what it entails.
14. The Blueprint for Change needs to be revised, as all tenants need to be included in its planning and development.
15. NYCHA created the Blueprint without resident involvement. Many residents are left out of the process because they don't know how to get on Zoom, and Resident Council members must relay information about the plan to residents in bits and pieces. NYCHA needs to go to each development and have meetings with everyone, as not everyone is Zoom or computer savvy.
16. Please hold off [on enacting the Blueprint for Change] until all residents are educated and informed. Our developments are not for sale, and we stand for public housing. We oppose this plan because it will harm tenants in so many ways. This plan threatens residents' existing rent cap, making rents more than 30% of our income. Under previous plans similar to the Blueprint, like RAD/PACT, this has already led to evictions. Private corporations, banks, and developers will make decisions about NYCHA's future, which will make it more difficult for our elected representatives to advocate on our behalf. This will mean even worse follow-through on repairs, mold removal, painting, replacing boilers, upgrades for appliances, fixtures, pest management - which NYCHA greatly needs. This plan will precipitate the loss of tenants' federal rights and protections, such as The Resident Council, Resident Management Corporation, Technical Assistance, and Eviction & Grievance Oversight.
17. NYCHA will continue to spend money--meant to support tenants/fix their homes—on trying to get the Blueprint passed instead. NYCHA has already spent \$200,000 on one consultant trying to convince tenants that this plan is a good thing.
18. NYCHA should not have held the public hearing for the FY22 Draft Annual Plan, as the plan is based on the Blueprint for Change. Legislation for the Blueprint for Change legislation has been killed. The Blueprint for Change and RAD/PACT face much public opposition—five

rallies were held in the last year opposing both, and a Remove Russ/ Kill the Blueprint petition has over 3,000.

19. NYCHA should create a new Annual Plan that is not based on the killed Blueprint legislation, that includes long term funding for Section 9, and that centers the needs of tenants.

RESPONSE 13—19: To be clear, the Blueprint does NOT involve any sales of developments or loss of resident rights. The Trust offers a solution that gets to the heart of the things that matter most to residents and other stakeholders. It would allow us to maintain developments as 100 percent public, while facilitating renovations, unlocking federal subsidy and leveraging funds in the same way local and state governments do for infrastructure projects such as bridges and critical facilities. NYCHA will continue to manage the properties. Residents will continue to have full rights, including rent caps, resident councils, technical assistance, and eviction and grievance oversight.

NYCHA recognizes that meaningful community engagement is paramount to the development and implementation of large-scale plans, such as the Blueprint. For this reason, NYCHA held weekly town hall meetings for residents to meet directly with NYCHA Chair Greg Russ and other senior leaders to ask questions and weigh in on this undertaking. NYCHA also met with all resident associations to explain the Blueprint ideas, answer questions and gather feedback. NYCHA and CCOP have been meeting weekly over the past year and discussed the Blueprint numerous times. Additionally, NYCHA's Intergovernmental Affairs Department hosted scores of briefings and meetings with advocates, labor partners, thought leaders, elected officials and other community partners — and worked tirelessly to adjust to means of virtual communication throughout the COVID-19 pandemic. NYCHA has engaged residents, staff, stakeholders and media about this plan via many forms of outreach— email, rent inserts and letters, flyers, our public website, online journals and social media. We will continue to use all communications means at our disposal to reach out to residents, take their feedback and ideas into account and keep them informed.

20. If a tenant lives in a three-bedroom apartment but would qualify for a one-bedroom apartment, will they be moved into the smaller unit under the Blueprint? Some residents may be against the Blueprint as they fear losing a three-bedroom apartment when they only qualify for a one-bedroom apartment. Some NYCHA employees may be against the Blueprint as they fear they may lose their jobs. Misinformation about the Blueprint is being spread among employees and residents, alike.

While it is true that efforts are made to right-size, this happens across the NYCHA portfolio, including under Section 9, and is not exclusive to any particular strategy. Every day, families remain on wait lists for a unit that is large enough to accommodate them. Right-sizing is a way to address the needs of each household and ensure they have an appropriately sized unit within NYCHA's portfolio.

21. Does NYCHA really need a trust to fund or administer money?

The Public Housing Preservation Trust would be a State-created public agency like NYCHA and the MTA. It is important because of its ability to unlock additional federal subsidy that NYCHA currently cannot, which can help to fill the authority's \$40 billion capital need, while addressing constant operating shortfalls. Even when NYCHA does receive funding, the current procurement structure doesn't deliver satisfactory results — leaving residents

frustrated and with delayed and low-quality repairs. Should NYCHA receive partial or full capital funding from the Infrastructure Bill or the Green New Deal for Public Housing, NYCHA can use the Trust to more effectively spend this funding and access additional federal subsidy to fully retrofit every property. As a reminder, through the Trust, properties would remain 100 percent public and residents would maintain public housing rights, while laying the foundation for faster and higher quality renovations.

22. There is no reason for NYCHA to take on this debt [which would be required as a part of the Blueprint for Change]. NYCHA should be working with Senator Schumer to get the money that is needed.

We continue to work with our federal delegation to secure funding for NYCHA. However, other public housing authorities are also in tremendous need and face a finite number of resources. With a \$40 billion deficit—a figure that increases by roughly \$1 billion each year—we still must think about and prepare NYCHA for the next generations of low-income residents. Moreover, any funding received through the federal Infrastructure Bill will be a one-time allocation, and still requires NYCHA to think strategically about how to best maintain and invest in these developments over the long-term. The Blueprint offers a path forward, while preserving the protections and benefits most important to residents.

23. Why can't NYCHA get the funds needed to repair the apartments the same way it gets the vouchers?

These policies and procedures are established by Congress and HUD. Over the past 40 years, funding for public housing has been dramatically reduced and, as buildings aged, the capital needs continued to grow. As previously stated, Congress has not fully funded public housing through the Section 9 Program.

24. NYCHA needs to provide a clear statement on the status of the public trust committee, as well as the selection of its membership via lottery. NYCHA also needs to release the schedule of these meetings, as the Sunshine Law supports public attendance. NYCHA should provide livestreaming and virtual participation for those who are homebound.
25. From an initial eight tenant member committee selected by lottery to having two tenants on committee, NYCHA's RAD tenant representatives do not constitute a public trust committee as initially constituted.

RESPONSE 24—25: The Trust has not yet been authorized, so no members have been selected. NYCHA recognizes the importance of choosing members of the Public Housing Trust that represent the residents. The legislation to create the Public Housing Trust currently contemplates a board made up of nine members — with four residents among them.

26. Residents have passed away in their apartments due to COVID-19, and their apartments still have not been cleaned out a year later. This negatively impacts neighbors in the building. The Blueprint for Change should not move forward until NYCHA can handle the issues such as these that it is already facing.

Every day, NYCHA works to combat mold, leaks, vermin, lead paint, heat and gas outages and many other basic maintenance failures — caused largely by decades of federal

disinvestment and mounting capital needs. Under the HUD Agreement and through work with the Federal Monitor, we continue to focus on core maintenance issues daily.

A hard fact is that NYCHA units are reaching a tipping point. We cannot continue without capital investment, and repair numbers and resource demands — without action — will continue to increase. While NYCHA has improved in many basic service areas and remains committed to continuing to do so, it will not be enough in the long run, which is precisely why the Blueprint matters.

27. NYCHA should hold a recognition ceremony to honor and thank resident leaders for their hard work in keeping residents safe throughout the pandemic.

During the COVID-19 pandemic, NYCHA staff and valued members of the community, including resident leaders, continued to bravely and selflessly show up for their fellow New Yorkers. We applaud and thank the efforts and dedication of these individuals. We see you and appreciate you. We routinely recognize the extraordinary efforts of our residents and staff in the NYCHA Journal, our online newspaper.

28. Through privatization/ engaging in public-private partnerships, NYCHA is relinquishing and ignoring residents' rights for managing their own developments. NYCHA needs to be held accountable to HUD Regulation 24 CFR Part 135, which initiates these rights.

29. Public housing is only considered public when funded by Section 9. Therefore, a plan that converts NYCHA units to Section 8 ends public housing.

30. Will the implementation of Section 8 end Section 9 in NYC?

31. NYCHA must ensure the continuous investment of public funds, as well as the correct allocation of funds. NYCHA must prohibit and stop private companies from embezzling public housing maintenance funds in various other forms.

32. Greg Russ should be removed as CEO/chairman of NYCHA. He has continued to center NYCHA operations, resources and funding around the Blueprint for Change as the agency's only solution, while standing to personally profit from NYCHA's privatization.

33. Chair Russ and NYCHA forge ahead with their plans, refusing to implement recommended changes. More importantly, NYCHA ignores requests for better resident participation in the planning process. Residents must be at the table during the whole process.

RESPONSE 28—33: Both the Trust and NYCHA are fully public entities, and under the Blueprint, NYCHA's properties would be strictly governed by federal regulations, state law, and property use agreements that all guarantee the consistent rent calculations and rights as under Section 9. For example, Section 607 of the Assembly bill that would authorize the Trust specifically codifies these rights and protections into State Law. There is nothing a private entity can do to change those affordability measures and resident rights. There are no market fluctuations or private entities that can affect these rights and protections. The Blueprint proposes to raise money in the same way other public institutions raise money. Numerous public institutions, such as the MTA, City of New York and DASNY, issue bonds. This allows them to make the critical investments in public infrastructure that New Yorkers need. There have been billions of dollars raised by these institutions and the risk is extremely low.

Since Chair Russ arrived at NYCHA in August 2019, he has personally met with residents, tenant leaders, advocates, partners and elected officials to hear about unacceptable conditions. These conversations directly informed the concept of the Trust, a public housing solution to deliver repairs to residents and support the long-term preservation of NYCHA's housing stock. We remain open to considering any solutions that raise capital needed and help to deliver repairs to NYCHA residents in a timely fashion. However, after decades of federal disinvestment that have allowed buildings to fall into disrepair, we can no longer wait to act. The Blueprint is a way to maintain the protections promised to residents in public housing, while addressing mounting capital needs and preparing it for generations to come.

Annual Plan Format

1. NYCHA must look back to its mission and create a new Annual Plan in collaboration with tenants, otherwise the ongoing injustice towards NYCHA tenants will continue.

NYCHA must create a new Draft Annual Plan which:

- Does not depend on the Blueprint,
 - Prioritizes the needs and interests of NYCHA residents,
 - Protects Section 964 regulations regarding tenant empowerment and participation,
 - Relies on a robust outreach strategy that genuinely engages at least 51% of NYCHA tenants via various platforms."
2. The Draft Annual Plan is confusing and hard to understand- even with cursory explanation. Draft Annual Plans should make clear their proposed policies and policy changes so that residents may understand.
 3. The Draft Annual Plan is 300+ pages, making a challenge for most readers to understand and absorb. NYCHA should provide a comprehensive format for presenting Annual Plan to Resident Leaders, which would make it easier to review pertinent information including budgets and programs, as well as shed light on the way these will impact their respective developments.

RESPONSE (1 - 3): NYCHA will take this comment under advisement and will explore additional ways to make the Annual Plan and its contents more easily understandable to residents and to all readers. NYCHA utilizes HUD's Annual Plan template (Form HUD-50075-ST) to prepare the Annual Plan each year. The document is lengthy due to the information we are required to provide to HUD on an annual basis. NYCHA includes an Executive Summary in the Annual Plan, which provides a high-level overview of NYCHA's major initiatives and policies in the upcoming fiscal year. The Executive Summary is also available as a separate document on NYCHA's website, and is available in Spanish, Russian, Chinese Traditional and Chinese Simplified. Please see NYCHA's Annual Plan website for links to these documents, <https://www1.nyc.gov/site/nycha/about/annual-plan-financial-information.page>. The English version of NYCHA's Blueprint for Change document is available for download at this link, https://www1.nyc.gov/assets/nycha/downloads/pdf/Blueprint_for_Change_Brief_8.5x11_English.pdf ease see the Blueprint for Change website for links to a video about the plan, townhall presentation, FAQs, Fact Sheet and video recording of a town hall: <https://www1.nyc.gov/site/nycha/residents/blueprint-for-change.page>.

4. NYCHA typically holds borough-wide meetings so that residents can ask questions and get clarity on the plan. However, this did not happen this year. NYCHA's Public Hearing for the FY22 Annual Plan and Amendment to the FY21 Annual Plan was in violation of the HUD's CFR 964 rules and regulations, as it did not give residents adequate time to prepare, testify, and give credible feedback on these plans.

NYCHA will take this comment under advisement. NYCHA stopped hosting town halls in each borough for the Annual Plan and Significant Amendments in 2016 because these events were not very well attended by residents. NYCHA hosts a public hearing for the Annual Plan and Significant Amendment at an accessible location when possible in accordance with public health guidelines and livestreams the public hearing on the Internet for residents to watch remotely; residents may also submit comments via email (annualplancomments@nycha.nyc.gov).

Notice of the Public Hearing

1. NYCHA's public hearing for the FY22 Draft Annual Plan does not comply with HUD public hearing requirements. NYCHA failed to provide the 45 days' notice prior to the public hearing. While NYCHA's website states the Annual Plan was published June 11, 2021, community stakeholders such as TA presidents, NYCHA residents, tenant organizers, as well as stakeholder organizations—including those which have testified at prior NYCHA hearings and are signed up on various NYCHA stakeholder listservs—only received notice of the Authority's 2022 Draft Annual Plan and hearing on July 11, a mere 16 days before this hearing. As such, NYCHA has failed to actually provide 45 days' notice, and is in direct violation of federal notice requirements. NYCHA's failure to circulate its draft annual plan and notices of this hearing with sufficient notice highlights its ongoing blatant disregard of its obligation to solicit resident and community input.
2. The hearing was made inaccessible due to its short timeframe and due to the fact that it was held online.
3. NYCHA skirted federal notice requirements in the release of the FY22 Draft Annual Plan in order to ram through a plan that does not reflect NYCHA residents' vision for the future of their respective communities. Over the past year NYCHA residents have protested repeatedly about their right to be included in all planning processes from inception, and not merely be informed after decisions have been made.
4. The purpose of providing a comment period is to provide opportunity to inform decision making around proposed rule changes or new initiatives. However, this requires availability of information. As per HUD's definition, 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. Despite the plan being dated June 11th, many residents and advocates were not aware the plan had been released or of the public hearing until July 12th at the earliest. This completely disregards the federal HUD notice requirements of at least 45 days. At the same time, this lack of notice and flawed outreach shows the clear disinterest in truly engaged tenant and community feedback. Posting a document on a webpage is inadequate notice when

it is regarding the largest public housing stock in the nation -- especially when the managing agency has had severe issues with communication in the past. NYCHA tenants deserve better.

5. On June 3, the NYS sponsors of the Blueprint for Change [legislation] said: "we have decided that further conversation, outreach, and negotiation are necessary before advancing legislation on this topic..." and "we look forward to continuing to discuss how best to meet the needs of public housing residents in the months ahead." No significant outreach to tenants, nor conversation, nor negotiation took place. This makes the public hearing for the FY2022 Draft Annual Plan held on July 27th illegitimate, as the Plan centers around the Blueprint for Change. The time frame for public participation in the Draft Annual Plan is extremely short and was opened with no prior notice. It is disrespectful to NYCHA tenants and stakeholders and does not show a faithful or genuine interest in tenant feedback or democratic participation by NYCHA.
 6. According to a 2018 report from the Mayor's Office of the Chief Technology Officer, more than half (56%) of New York City's lowest-income households lack a home broadband subscription. This rate is nearly double that for the citywide population. Although the City is working to remedy this, the issue of access persists. The virtual format of the Public Hearing for the FY2022 Draft Annual Plan creates a major obstacle for tenants and overlooks the accessibility and technology challenges NYCHA tenants face. Although in-person daytime hearings are also extremely inconvenient for working people, the technology barrier is not something you can ignore, as it's blatantly undemocratic.
- *RESPONSE (1 – 6): As per federal statute, the Draft FY 2022 Plan was required to be released at least forty-five (45) days prior to the public hearing. The Authority's Draft FY 2022 Plan was released on June 11, 2021 on the Authority's website due to COVID-19 restrictions in place at the time of its release. On June 11, 2021 the Annual PHA Plan/Significant Amendment website (<https://www1.nyc.gov/site/nycha/about/annual-plan-financial-information.page>) included links to the following documents:*
 - o *Draft FY 2022 Plan and Draft Significant Amendment to the FY 2021 Annual Plan ("Draft Significant Amendment")*
 - o *Executive Summaries for both documents in English*
 - o *The Annual PHA Plan/Significant Amendment Flyer in English, Spanish, Chinese and Russian*
 - o *Link to directly submit a comment or question to the Annual PHA Plan email box*
 - o *Link to register to attend the virtual public hearing*

The Authority conducted the following additional outreach activities to encourage residents and the public to comment on the Draft FY 2022 Plan and Draft Significant Amendment as well as attend the virtual public hearing:

- o **June 12th to June 14th** – The July rent bill was mailed to approximately 163,000 households which included the Annual PHA Plan/Significant Amendment notice in English/Spanish. About 56,000 households received their rent bill through an "e-bill" with the notice on June 13, 2021.
- o **July 8th** - Executive Summaries for both documents were posted online in the translated languages (Spanish, Chinese and Russian).
- o **July 9th – 16th** – The Authority's General Services Department completed the printing and distribution of the Draft FY 2022 Plan and Draft Significant Amendment documents to two hundred and six (206) Resident Association Presidents and Section 8 leaders (including members of the RAB) and one hundred and thirty-eight (138)

development management offices. Please note this was a large printing of about 340 pages, double-sided for the Draft FY 2022 Plan and Draft Significant Amendment.

- o **July 12th, 23rd, and 27th** – The Authority’s Department of Intergovernmental Affairs sent three email blasts to their listserv starting on July 12, 2021.
- o **July 13th** – An email notification was sent to NYCHA resident leadership reminding them about the date and time of the virtual public hearing and that the Draft FY 2022 Plan and Draft Significant Amendment documents were available for pick up at their management offices.
- o **Week of July 19th** – Annual PHA Plan/Significant Amendment Flyers were posted in the Authority’s residential buildings.
- o **July 19th** - Robocalls (162,000) were conducted in English, Spanish, Chinese, and Russian.
- o **July 20th** – An email blast was sent to the Authority’s households (106,000 public housing households and 44,800 Section 8 households) and social media posts were released online.
- o **July 21st** – The NYCHA Journal article on the public hearing was published online.

On July 27, 2021, the Public Hearing on the Draft FY 2022 Plan and Draft Significant Amendment was held remotely via the Zoom application and was live-streamed on the Authority’s website. Over nine hundred (900) people registered for the hearing and there were over three hundred (300) online Zoom attendees and 74 call-in participants, for a total of 441 attendees. The hearing was also livestreamed on YouTube, and as of August 23, 2021, the stream has 628 total views.

- **Public Hearing Accessibility:**

- i. *NYCHA ensured that the public hearing was accessible both online and by phone.*
 - 1. *Phone numbers to access and participate in the Public Hearing were included in rent bill notices and flyers to all residents, as well as in robocalls. This meant that those with limited access to a computer/to internet did not need email or a computer to access this information.*
 - 2. *NYCHA created a “how-to” guide for accessing the Public Hearing and for using Zoom, which viewable in all translation languages available on the nyc.gov website. The guide gives explanation for accessing the public hearing online as well as by phone, and how to utilize foreign language and ASL interpretation features. The guide is viewable via the Annual Plan webpage and at this link:*
<https://www1.nyc.gov/site/nycha/about/how-to-guide-for-attending-public-hearing.page>
- ii. *NYCHA accounted for public hearing accessibility for those who are deaf and hard-of-hearing, and those with other accessibility needs:*
 - 1. *NYCHA provided closed captioning in both the live Zoom webinar and on the YouTube livestream*
 - 2. *NYCHA provided ASL interpretation in both the live Zoom webinar and on the YouTube livestream*
 - 3. *NYCHA provided a phone number and email address for people to request reasonable accommodation related to participation in the Public Hearing. These were promoted in NYCHA’s rent bill notice, flyer, and on the Annual Plan webpage:*

<https://www1.nyc.gov/site/nycha/about/annual-plan-financial-information.page>

- iii. NYCHA provided foreign language translation and interpretation:
 1. As well as posting the English version, NYCHA posted translated versions of the Public Hearing presentation in Chinese Simplified and Chinese Traditional, Russian, and Spanish on its Annual Plan webpage in advance of the hearing:
<https://www1.nyc.gov/site/nycha/about/annual-plan-financial-information.page>
 2. NYCHA provided foreign language interpretation services on both Zoom webinar and by phone. These features were promoted in rent bill notices, flyers, robocalls, emails, and explained in detail in the How-To Guide.
- iv. NYCHA provided multiple avenues to sign-up to give verbal testimony, including via Survey Monkey form, phone, and via the Zoom “raised-hand” function.
 - **Comment Submission Accessibility:** NYCHA provided multiple avenues to provide written comment/testimony, including via email, mail, fax, and Q&A Box in Zoom. These avenues were clearly stated in the Draft Annual Plan, Draft Significant Amendment, on all flyers and notices (including the rent bill notice), and on NYCHA’s website as of June 11, 2021.

Promotion of Draft Annual Plan & Public Hearing

1. NYCHA should be required to not only post hearing notices on their website and in affected buildings, but also send them via a NYCHA-wide email list for residents for whom NYCHA has an email, and work with local CBOs to distribute notices. NYCHA should find every opportunity and avenue to share information, including to CBOs that support tenants in their daily issues.

NYCHA will take this recommendation under advisement and will look to revise its process for sending email and robocall notifications to residents, as well as notification to stakeholder groups regarding the Draft Annual Plan or Significant Amendment’s initial release going forward.

2. Are these questions [being asked in the Public Hearing Q&A] being added to the Annual Plan?
3. NYCHA should be required to respond to comments if they hold a public hearing as required in the Blueprint bill.

RESPONSE (2 & 3): Comments and questions from both Resident Advisory Board (RAB) meetings and the Public Hearing, as well as NYCHA’s responses to them, are included as a part of the Final Annual Plan. Please see Attachments M and N.

Additional Comments

- NYCHA needs to explain the Trust model and the use of bonds with the Trust in more detail.

The Public Housing Preservation Trust would be a State-created public agency like NYCHA and the MTA. The Trust is needed because of its ability to unlock additional federal subsidy that NYCHA currently cannot, which can help to meet the authority's \$40 billion capital needs while addressing constant operating shortfalls. Even when NYCHA does receive funding, the current procurement structure doesn't deliver satisfactory results — leaving residents frustrated and with delayed and low-quality repairs. Should NYCHA receive partial or full capital funding from the Infrastructure Bill or the Green New Deal for Public Housing, NYCHA can use the Trust to more effectively spend this funding and access additional federal subsidy to fully retrofit every property. As a reminder, through the Trust, properties would remain 100 percent public and residents would maintain equivalent rights, while laying the foundation for faster and higher quality renovations.

Under the approach described in the Blueprint for Change, we are proposing that NYCHA or the Public Housing Preservation Trust may issue bonds or secure long-term construction debt financing for renovation and maintenance of properties. By converting the units to Section 8, NYCHA will receive more in subsidy from HUD for each unit that can be used to leverage debt for repairs. Debt obligations will be sized to ensure the ability to meet payments, which means no over-borrowing. We will also look to create replacement and operating reserves at the development level, which will mean the developments will be even more financially secure.

Bond financing is used by other public entities, such as the MTA, City of New York, and Dormitory Authority of the State of New York, to raise funding for critical investments in public infrastructure that New Yorkers need and is a safe and accepted method for such funding.

In the extraordinarily unlikely event of a default, the properties and residents will still be protected. The trust legislation as proposed, federal Section 8 requirements, and the contractual agreements between NYCHA and the Trust will still require the properties to be operated as low-income housing subject to housing quality standards. Resident rights and protections will remain in place. The Trust can only be dissolved by the legislature. If this happened, the Trust's assets return to NYCHA. Lastly, the City and State will have the right to cure any default, which acts as a backstop in any worst-case scenarios. At every step of the process, there will be governmental opportunities to correct any issues or potential defaults.

- Do any of the people trying to push the Annual Plan live in NYCHA buildings or see/understand what happens in NYCHA buildings?

As a HUD public housing authority (PHA), NYCHA must follow a set, HUD-approved Annual Plan process. Part of this process includes utilizing HUD's Annual Plan template and informing and engaging the PHA's Resident Advisory Board (RAB) throughout this process. The Resident Advisory Board (RAB) consists of public housing and Section 8 residents. It primarily addresses various aspects of NYCHA's annual and five-year agency plans, which set forth NYCHA's priorities and policies and chart the course for NYCHA's short-term and long-term future. RAB members express concerns, make recommendations, and advise NYCHA management as the plans are drafted. The RAB's questions, comments, and recommendations for the final plan are incorporated when the plan is submitted to HUD. RAB members are responsible for informing residents in each development/district about the plans' development at both the draft and final stages. The RAB structure consists of the jurisdictional-wide resident body (CCOP) and their appointed delegates.

Environmental Justice Initiative (EJI) Testimony

1. We urge NYCHA to properly utilize funding already at its disposal and reflect on its responsibilities to act with diligence regarding that funding and the remediation work it is meant to address.
2. There are soil contamination issues at Smith and NYCHA has refused to conduct additional testing beyond its problematic Waldon Report. This leaves the residents to cover the cost of knowing what is there, while also having no functional ability to leverage independent soil contamination findings into action on NYCHA's part. Soil contamination can exacerbate existing health conditions, and, EJI notes, this is especially problematic during an ongoing pandemic—and considering the vulnerability of the population.
3. Audits conducted by New York City Comptroller's office show an alarming pattern in NYCHA's maintenance and contracting practices, directly putting residents at risk of physical harm as well as deprive resident-workers of their well-earned wages.
4. New York City and State have implemented measures agencies must take to ensure they are hiring qualified and respectable contractors. NYCHA continues to ignore these measures and hire contractors who have a proven track record of violating labor laws and contract provisions.

RESPONSE (1 – 4): The Smith Houses construction project referenced by the Environmental Justice Initiative's (EJI) July 30, 2021 comments the NYCHA FY 2022 Draft Annual Plan and Draft Significant Amendment to the FY 2021 Annual Plan Public Hearing (the Comments) is part of the overall \$3.2 B in overall disaster recovery funding grants received from the Federal Emergency Management Agency (FEMA) to address the impacts of Superstorm Sandy. Although the amount of funding is substantial, the uses of this funding is limited to repair of damage (as determined by FEMA) that resulted from Sandy and construction of measures to mitigate damage from future storm events.

Smith Houses consists of 12 buildings and FEMA determined that four of those buildings suffered damaged from Sandy and were eligible for disaster funding.

The total Sandy recovery investment at Smith Houses is expected to total \$83M and the four years of construction is estimated to be within approximately two months of being substantially complete. This investment will result in the following for the four Sandy damaged buildings

Resiliency measures including installation of:

- *Dry flood proofing to mitigate future damage to apartments, interior spaces, and critical infrastructure components.*
- *Full backup power generators to be located at the roofs of the four FEMA funded buildings to ensure electrical power will be available during a future storm event.*
- *New electrical annex at roof level for current transformer cabinets and electrical panels.*

Development Improvements

- *Replace exterior site lighting fixtures*
- *Restore two playgrounds*
- *Resurface site pavement impacted by the construction*
- *Replace underground electrical wiring system*

Building Improvements

- *Replace first-floor doors, door frames, and hardware damaged by water*
- *Replace the roof on the four affected buildings*

NYCHA authorized Walden Environmental Engineering, PLLC (Walden) to conduct an environmental soil investigation in the location of certain utility excavations. The concentrations found by Walden's investigation are generally consistent with the 2018 soil concentrations reported by EJI.

That investigation found that the semi-volatile organic constituents (which includes PAHs) and metal analytical results are representative of "common urban background soils" and/or "historical fill materials" which are common to urban areas such as New York City. Notwithstanding the question of whether the constituent concentrations found in the soil represent a health risk at Smith, any such health risk would only occur if a resident was exposed to the excavated material for a sufficient period of time. NYCHA's exterior construction activities are generally separated from residents using fences and other controls; therefore, residents would not come in direct contact with excavated materials. However, construction activities can create dust, which, if not controlled, could migrate beyond the controlled construction areas. To demonstrate that the construction dust control measures utilized during construction were effective NYCHA implemented an air monitoring program that was consistent with guidance provided by the New York State Department of Environment and Conservation (DEC). To date the monitoring program has not found exceedance's of DEC's recommended action levels.

NYCHA has committed to planting 47 trees to replace eight trees removed by construction. NYCHA continues to work with the tenant association (TA) to address concerns regarding the trees. Recently, NYCHA's Compliance Department retained a certified arborist to work with the certified arborist hired by the TA in order to collaborate on appropriate plans to further assess tree health and, if necessary, mitigate any impacts to trees caused by the construction activities. This builds upon prior work conducted by the New York City Parks Department and an arborist retained by the construction contractor.

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

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

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

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

1.1. Purpose

This notice (Notice) provides PHAs,² Project Owners, and their RAD development partners with guidance regarding key fair housing and civil rights statutory and regulatory requirements, explains the situations in which HUD is requiring front-end fair housing and civil rights reviews, and provides information regarding the types of information that must be submitted to facilitate HUD’s review of certain fair housing and civil rights requirements in connection with public housing conversions under the First Component of RAD. This Notice also includes guidance

¹ While this Notice addresses fair housing and civil rights requirements and relocation requirements, the fair housing and civil rights requirements are not limited to relocation issues.

² Consistent with PIH Notice 2012-32 (HA) REV-2 (PIH 2012-32 (HA) REV-2) (the “RAD Notice”), this Notice uses the term “PHA” to refer to the owner of the project prior to the RAD conversion and “Project Owner” to refer to the owner of the project after the RAD conversion.

regarding key relocation statutory and regulatory requirements, and details relocation requirements under RAD. This Notice only applies to projects converting under the First Component of RAD; it does not apply to the Second Component of RAD.³

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

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

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

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

³ Important fair housing, other civil rights, and relocation considerations apply also to the Second Component of RAD as provided in the RAD Notice. Participants in the Second Component of RAD must continue to comply with applicable fair housing, civil rights, and relocation statutes and regulations, and HUD may, at any time, initiate compliance or enforcement actions in connection with such requirements. The RAD Notice will continue as the primary source of information on fair housing and other civil rights requirements covering the Second Component of RAD without any change until further notice.

(b) the requirements of Section 104(d) of the Housing and Community Development Act of 1974 (Section 104(d)) if CDBG or HOME funds are included as part of the project, (c) fair housing and other civil rights considerations implicated by relocation activities, and (d) requirements for relocating residents under the RAD Notice.

1.2. PHA and Project Owner Responsibilities

This Notice explains RAD's front-end fair housing and other civil rights review requirements in greater detail than was provided in the RAD Notice and this Notice restates and revises RAD's relocation requirements. However, the fair housing, other civil rights, and relocation requirements that apply to RAD conversions are neither limited to those discussed in this Notice, nor to those specifically reviewed by HUD in the front-end review.

MEETING HUD'S PROCESS AND REVIEW REQUIREMENTS NEVER CONSTITUTES COMPLIANCE WITH SUCH LAWS. THE OBLIGATION TO COMPLY WITH APPLICABLE FAIR HOUSING, OTHER CIVIL RIGHTS, AND RELOCATION LAWS REMAINS WITH THE PHA AND PROJECT OWNER.

The fair housing and civil rights requirements that apply to RAD conversions are not limited to those discussed in this Notice. PHAs and Project Owners are responsible at all times for ensuring that their RAD activities (including those activities implemented by their agents, consultants, contractors, or other RAD team members) comply with all applicable fair housing and civil rights requirements. PHAs and Project Owners shall be accountable for all fair housing and civil rights compliance issues with respect to their RAD activities, whether those activities are undertaken directly or through agents, consultants, contractors, or other RAD team members. While HUD provides this non-exhaustive guidance to assist PHAs and Project Owners during transactions, complying with the requirements set forth in this Notice does not necessarily mean that they, or their agents or consultants, are in compliance with fair housing and civil rights requirements.⁴

This Notice is not intended to, and shall not be construed to, reduce or in any way limit the application of fair housing, other civil rights, and relocation laws and regulations to RAD transactions. For example, HUD's reliance on a PHA's certification that a site meets the site and neighborhood standards required by the RAD Notice is not a determination of compliance with the duty to affirmatively further fair housing or other fair housing and civil rights requirements. As another example, HUD's approval of a site for new construction does not, by itself, constitute a determination of the PHA's compliance with all provisions of Title VI and its duty to affirmatively further fair housing found in the Fair Housing Act and other fair housing and civil rights requirements, nor indicate HUD's approval of the PHA's or locality's overall housing strategy. HUD's approval of a RAD conversion after front-end review reflects only that the project may proceed through the RAD conversion process; it does not constitute a determination

⁴ The PHA's or Project Owner's agents, consultants, contractors, and other RAD team members may also have fair housing and other civil rights obligations (whether under this Notice or otherwise) and the forgoing does not, in any way, limit the independent obligation of any such parties to ensure their own compliance with applicable fair housing and other civil rights laws.

that the project is in compliance with applicable fair housing, civil rights, and relocation requirements.

HUD's approval of a front-end review submission is based on limited information and is intended to assist the PHA or Project Owner in meeting their fair housing, civil rights, and relocation obligations.⁵ The PHA is responsible for ensuring that its RAD conversion is consistent with its certification to affirmatively further fair housing and complies with applicable civil rights laws.⁶ The front-end reviews described in this Notice shall not be construed to limit other fair housing and civil rights investigations that HUD may conduct. HUD retains all compliance and enforcement authority.

HUD's determination that the PHA or Project Owner has failed to meet submission, certification, or approval requirements with respect to fair housing, other civil rights, or relocation requirements is grounds for terminating a Commitment to enter into a Housing Assistance Payments Contract (CHAP), denying the issuance of a RAD Conversion Commitment (RCC), or denying authority to convert under RAD.

1.3. Applicability

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

This Notice supplements the RAD Notice with respect to fair housing and civil rights requirements applicable to public housing properties converting under RAD and with respect to all matters related to the relocation of residents as a result of RAD public housing conversions. To the extent that there is a conflict between this Notice and the RAD Notice, this Notice shall govern. This Notice replaces and supersedes Notice H 2014-09/PIH 2014-17 (issued July 14, 2014).

Upon issuance, the terms of this Notice will apply to all projects that have applied for conversion of assistance under the First Component of RAD but have not yet converted. As this Notice provides guidance, clarification, and explanation regarding fair housing and civil rights requirements that are already applicable to RAD conversions, this Notice shall not affect any front-end civil rights approvals provided by HUD prior to the effective date of this Notice and otherwise shall be effective with respect to front-end civil rights approvals without exception. However, with respect to relocation activities for Converting Projects under the First Component where a PHA has already submitted a Financing Plan pursuant to the RAD Notice at the time of issuance of this Notice, and provided that the Financing Plan has been accepted for full review after initial screening for completeness, the PHA may, within sixty (60) days after issuance of this Notice, request (in writing uploaded to the RAD Resource Desk) to be governed by H 2014-

⁵ For example, the front-end review is specific to an individual site. A PHA that does not promote fair housing choice outside areas of minority concentration and continues to site affordable housing in minority concentrated areas may be in noncompliance with the duty to affirmatively further fair housing and other fair housing and civil rights obligations, even if the specific site is approved based on the information provided and pursuant to the front-end review of the PHA's site and neighborhood standards submission.

⁶ See 24 C.F.R. § 5.105 and, as applicable, 24 C.F.R. § 983.57(b)(2) or Appendix III of the RAD Notice.

09/PIH 2014-17. For such projects and where otherwise appropriate in cases of hardship as determined by HUD, HUD may apply the terms of H 2014-09/PIH 2014-17 with respect to relocation activities, but not with respect to fair housing and civil rights requirements.

RAD projects which have been awarded Choice Neighborhoods Implementation (CNI) grants are subject to the provisions of the applicable Choice Neighborhoods Notice of Funding Availability (NOFA) and grant agreement regarding site and neighborhood standards and are not subject to the RAD front-end civil rights transaction reviews described in this Notice. For properties being redeveloped with funding under a CNI grant, the relocation requirements set forth in this Notice are superseded by guidance regarding relocation included in the CNI NOFA. Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a Choice Neighborhood project's conversion of assistance.

1.4. Explanation of Major Provisions

This Notice adds to and revises pre-existing guidance related to fair housing, civil rights, and relocation (as contained in the RAD Notice and H 2014-09/PIH 2014-17) with respect to RAD transactions. Among the key provisions and changes are the following:

Fair Housing & Civil Rights

- Reaffirms the applicability of fair housing and civil rights requirements to all RAD-related activities (see, e.g., Section 3.3 and Section 4);
- Reiterates when HUD front-end civil rights review (originally outlined in the RAD Notice) is required in addition to the PHA's analysis and certification of compliance, to assist the PHA and Project Owner to comply with fair housing and civil rights requirements (see Section 5.3);
- Outlines certain conditions under which HUD will conduct a front-end review to determine whether the site is in an area of minority concentration relative to the site's housing market area (see Section 5.4(A));
- Provides guidance, for purposes of the RAD front-end civil rights review, on the concepts of "area of minority concentration" and "housing market area" that are reviewed when determining whether a site is in an area of minority concentration (see Section 5.4(B));
- Elaborates on specific information that HUD will consider, and that PHAs should provide evidence of, in order for a proposed site to meet the existing exceptions to permit new construction in an area of minority concentration, identifies presumptions for meeting the sufficient comparable opportunities exception and describes factors that HUD may consider in evaluating the overriding housing needs exception (see Section 5.4(C) and Section 5.4(D));
- Articulates issues that HUD will consider in completing the front-end civil rights review for transfers of assistance, including, for example, accessibility and minority concentration (see Section 5.5);
- Outlines the information to be submitted for HUD's front-end civil rights review of transactions where unit reductions, unit reconfigurations, or changes in occupancy are proposed (see Section 5.6);
- Identifies the situations where front-end civil rights reviews are required when changes in the accessibility features of a site are made (see Section 5.7(B)); and

- Prohibits the Project Owner of a Converted Project with a PBRA HAP contract from initiating any new leasing or marketing activities (other than leasing and outreach to households holding a right to return to the Covered Project), including the solicitation, distribution or acceptance of applications or development of a waiting list, until HUD has approved the Affirmative Fair Housing Marketing Plan (“AFHMP”) (see Section 5.8).

Relocation

- Requires PHAs or Project Owners to prepare a written relocation plan for all transactions that involve permanent relocation or temporary relocation anticipated to exceed 12 months (see Section 6.1);
- Requires PHAs to provide residents with a RAD Information Notice (RIN) in order to ensure that residents are informed of potential project plans and of their rights in connection with RAD prior to submission of the RAD application (see Section 6.6(A));
- Clarifies that the General Information Notice (GIN), when applicable, should be provided as soon as feasible and no later than 30 days following the issuance of the CHAP (see Section 6.6(B));
- Requires Project Owners to provide a notification of Return to the Covered Project, when applicable (see Section 6.6(F));
- Moves the date before which PHAs are prohibited from beginning any physical relocation earlier in the conversion process (specifically, from the date of Closing to the later of the effective date of the RCC and the expiration of the 30- or 90-day RAD Notice of Relocation period, as applicable) (see Section 6.8);
- Clarifies the specific requirements applicable to different types of relocation (e.g., moves within a property, temporary relocation of less than 12 months, etc.) (see, e.g., Section 6.4);
- Provides enhanced guidance on the right to return requirements, any offers of alternative housing options and the documentation that must be retained when tenants choose an alternative housing option and decline their right to return (see, e.g., Section 6.2 and Section 6.10);
- Describes how HUD has administratively implemented URA requirements and URA relocation assistance and payments for displaced persons, when applicable, to residents who choose to decline the right of return and, instead, choose voluntary permanent relocation (see, e.g., Section 6.4(C) through (F) and Section 6.10);
- Requires PHAs to maintain detailed data regarding each household that will be relocated, with key dates of notices and moves (see Section 6.9); and
- Identifies key fair housing and civil rights requirements applicable during relocation (see, e.g., Section 4).

1.5. Request for Public Comment

HUD acknowledges the complexity of the issues addressed in this Notice. This Notice is effective immediately upon issuance, but HUD also seeks comment from the public regarding the clarity and organization of the Notice and regarding areas where the policies and procedures described are unclear or ambiguous. HUD will consider whether changes in response to comments are justified and will implement any appropriate changes in a revision of this Notice. Please submit all comments to RAD@hud.gov within 30 days of the issuance of this Notice.

1.6. Paperwork Reduction Act

In accordance with the Paperwork Reduction Act (PRA), HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number. OMB approved information collection forms will be posted on the RAD website and the Federal Register.

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SECTION 3. Background

3.1. RAD Authority

RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Pub. L. No. 112-55, enacted November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Public Law 113-76, enacted January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Public Law 113-235, enacted December 6, 2014), and the Division L, Title II, Section 237 of the Consolidated Appropriations Act (Public Law 114-113, enacted December 18, 2016), collectively and as it may be further amended from time to time, the “RAD Statute.” RAD allows certain eligible properties to convert assistance to long-term project-based Section 8 contracts and has two separate components. The First Component allows projects funded under the public housing program to convert their assistance to long-term, project-based Section 8 rental assistance contracts. Under this component of RAD, public housing agencies (PHAs) may choose between two different Section 8 housing assistance programs: project based vouchers (PBVs) or project-based rental assistance (PBRA). The “Second Component” of RAD allows owners of projects funded under the Rent Supplement (Rent Supp), Rental Assistance Payment (RAP), and Moderate Rehabilitation programs to convert certain units to PBV or PBRA Section 8 units following certain contract expirations or terminations. The RAD Statute is implemented by the RAD Notice.

3.2. Definitions

All capitalized terms defined in the RAD Notice, as amended, shall have the definitions ascribed to them therein unless otherwise specifically noted in this Notice.⁷ Pre-conversion projects whose assistance is converting from public housing to Section 8 under RAD are referred to in the RAD Notice and in this Notice as “Converting Projects.” Post-conversion projects are referred to in the RAD Notice and this Notice as “Covered Projects.”

3.3. Applicable Legal Authorities

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

⁷ Many of the fair housing and civil rights concepts used throughout this Notice are terms of art that are defined in applicable statutes and regulations identified in Appendix I of this Notice, while others have been developed through judicial interpretation. PHAs and Project Owners should familiarize themselves with these terms of art and should consult 42 U.S.C. § 3602 (Fair Housing Act); 24 C.F.R. §§ 5.152-100.20 (Fair Housing Act); 42 U.S.C. §§ 2000d-2000d-4a (Title VI of the Civil Rights Act of 1964); 24 C.F.R. § 1.2 (Title VI); 29 U.S.C. § 705 (Rehabilitation Act); 24 C.F.R. § 8.3 (Section 504); 42 U.S.C. §§ 12102, 12132, 12181 (Americans with Disabilities Act (ADA)); 28 C.F.R. § 35.104 (Title II of the ADA); and 28 C.F.R. § 36.104 (Title III of the ADA). In addition, many of the relocation concepts are terms of art that are defined in 42 U.S.C. § 4601 *et seq.* (Uniform Relocation Act (URA)), Section 104(d) of the Housing and Community Development Act of 1974 codified at 42 U.S.C. § 5304(d), and their implementing regulations at 49 C.F.R Part 24 and 24 C.F.R. Part 42 subpart C.

Part 1. PHAs and Project Owners must be familiar with these legal authorities and must evaluate, based on the facts of their situation, which legal authorities are applicable in which situations. **Failure to comply with any legal authority as applicable to the PHA's or Project Owner's actions or inactions may result in liability under such authority.** Appendix I does not attempt to provide a complete and exhaustive explanation of the legal authorities, nor to fully inventory the situations in which each legal authority is applicable. Instead, Appendix I is an overview intended to serve as a general introduction or reminder for PHAs and Project Owners of these fair housing, other civil rights, and relocation authorities and to facilitate their identification of appropriate topics for further research or expert counsel. The recitation of these legal authorities neither expands nor diminishes their applicability to the PHA's and Project Owner's activities in connection with their RAD conversion.

The RAD Statute authorizes the Secretary of HUD to waive or specify alternative requirements for certain provisions of law, except for requirements related to, among others, fair housing and nondiscrimination.⁸ In addition to the general application of various federal statutes and their implementing regulations as discussed in Appendix I, below, HUD regulations at 24 C.F.R. § 5.105 apply such authorities to all HUD programs, including RAD.

3.4. Further Information

Because each RAD proposal varies in its scope, this Notice may not address each PHA's or Project Owner's specific circumstances. PHAs and Project Owners should carefully review the laws, regulations, notices, and guidance material referenced in this Notice. Any questions related to the administration of the RAD program should be referred to the appropriate RAD Transaction Manager (TM) or may be emailed to rad@hud.gov.

SECTION 4. Generally Applicable Fair Housing and Civil Rights Requirements Relevant Throughout the RAD Conversion Process

This Section provides a summary overview of key principles regarding program implementation and an overview of generally applicable fair housing and civil rights requirements. Appendix I identifies the key legal authorities from which these principles are derived. These key principals, together and with the legal authorities identified in Appendix I, frame the PHA's efforts to implement a RAD conversion. In some cases, these requirements are particularly relevant to the process of planning the RAD conversion, while in others they have particular relevance for the structure of the RAD transaction itself, and in yet other cases, both. Elements of RAD transactions that have civil rights implications include, but are not limited to, transfers of assistance, temporary and permanent relocation, demolition, site selection, new construction, occupancy policies, changes in unit configuration, increases or reductions in units, waiting list administration policies, policies regarding return of temporarily relocated tenants, substantial rehabilitation or alteration, program accessibility, tenant selection policies and priority transfers, providing information to and communicating with persons with Limited English Proficiency (LEP) and persons with disabilities, reasonable accommodation policies, and Affirmative Fair

⁸ See Pub. L. No. 112-55, as amended.

Housing Marketing Plans (AFHMPs). All PHAs must consider civil rights when structuring these and other elements of their RAD transaction.

RAD transactions are governed by the same civil rights authorities that govern HUD-assisted activities generally.⁹ Converting Projects are subject to civil rights and equal opportunity requirements under the public housing regulations, and Covered Projects are subject to civil rights and equal opportunity requirements under the PBV regulations or the PBRA regulations, as applicable.¹⁰ As described further below, the Fair Housing Act prohibits discrimination in housing¹¹ and requires all federal executive departments and agencies to “administer their programs and activities relating to housing and urban development ... in a manner affirmatively to further” fair housing.¹² In addition, all programs or activities receiving Federal financial assistance are subject to Title VI of the Civil Rights Act of 1964 forbidding discrimination on the basis of race, color, and national origin¹³ and Section 504 of the Rehabilitation Act of 1973, which forbids discrimination on the basis of disability and requires that programs or activities receiving Federal financial assistance make such programs or activities “when viewed in its entirety” readily accessible to persons with disabilities and make reasonable accommodation to the needs of persons with disabilities.¹⁴ RAD transactions are also subject, as applicable, to the requirements of Titles II and III of the Americans with Disabilities Act, Executive Order 11063, and HUD regulations at 24 C.F.R. part 107. Thus, as with the administration of all HUD programs and all HUD-assisted activities, fair housing and civil rights issues must be considered in the administration of the RAD program. PHAs must not implement actions and policies that may have a discriminatory effect on the basis of race, color, sex, national origin, religion, disability, or familial status or that may impede, obstruct, prevent, or undermine efforts to affirmatively further fair housing.¹⁵ Note, in particular, the following requirements:

- **Affirmatively Furthering Fair Housing (AFFH):** The Fair Housing Act requires that HUD administer its programs and activities in a manner that affirmatively furthers the purposes of the Fair Housing Act. The Fair Housing Act not only prohibits discrimination but, in conjunction with other statutes, directs HUD’s recipients, including PHAs, to take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination. Through various statutes, regulations, and executive orders, PHAs must take various actions in accordance and in conjunction with their Fair Housing Act obligation to affirmatively further fair housing. For example, under regulations implementing the United States Housing Act of 1937 (the Act), HUD recipients must, among other requirements, certify that they will affirmatively further fair housing. In addition, under HUD’s Affirmatively Furthering Fair Housing (AFFH) rule promulgated July 16, 2015, PHAs must periodically conduct an Assessment

⁹ See 24 C.F.R. § 5.105.

¹⁰ See, e.g., 24 C.F.R. §§ 880.601, 881.601 and 983.8 for civil rights related regulations applicable to PBV and PBRA transactions.

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

¹² 42 U.S.C. § 3608(d) and (e).

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

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

¹⁵ See 24 C.F.R. part 1 and part 100 subpart G.

of Fair Housing (AFH) as set out by the rule, either individually or in collaboration with other program participants.¹⁶ Under the AFFH rule, in order to develop a successful affirmatively furthering fair housing strategy, the PHA must assess the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs. PHAs must ensure that their activities in connection with a RAD conversion are consistent with their AFH, including any applicable joint or regional AFH in which they are a joint participant, and with any applicable Analysis of Impediments to Fair Housing Choice (AI), Fair Housing Equity Assessment, PHA 5-Year Plan, PHA Annual Plan, Moving to Work (MTW) Plan, or related planning documents and other regulatory and programmatic requirements implementing the obligation to affirmatively further fair housing to which they are a party.¹⁷

- **Nondiscriminatory Site Selection:** HUD’s site and neighborhood standards require that the proposed site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provision of Title VI of the Civil Rights Act, the Fair Housing Act, Executive Order 11063, and Department regulations implementing these authorities. The site must meet the Section 504 site selection requirements in 24 C.F.R. § 8.4(b)(5). Additional provisions appear in 24 C.F.R. § 983.57(b) of the PBV rules and, for PBRA, in Appendix III of the RAD Notice. HUD’s Title VI regulation specifically prohibits site selection that has the “purpose or effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination” on the basis of race, color, or national origin.¹⁸ The Title VI regulations also impose an obligation on the part of an applicant or recipient of HUD financial assistance to take actions to overcome the effect of prior discrimination or conditions that limit participation by persons of a particular race, color, or national origin.¹⁹ In addition, HUD’s Section 504 regulation prohibits recipients from selecting sites the purpose or effect of which would (1) exclude qualified individuals with disabilities from or deny them the benefit of a program or activity, or otherwise subject them to discrimination; or (2) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities.²⁰ ADA regulations likewise prohibit site selections that have the purpose or effect of excluding individuals with disabilities (including members of the public with disabilities), denying them benefits, or subjecting them to discrimination.²¹ Finally, the Fair Housing Act prohibits discriminatory site selection, including perpetuation of segregation in transfers of assistance and new construction.
- **Meaningful Access for Persons with Limited English Proficiency (LEP):** The PHA or Project Owner is required to take reasonable steps to ensure (a) they provide meaningful access to programs and activities for persons who have a limited ability to read, speak, or understand English; (b) any person with LEP who will be temporarily relocated or

¹⁶ 24 C.F.R. § 5.150 *et seq.*

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

¹⁸ *See* 24 C.F.R. § 1.4(b)(3).

¹⁹ *See* 24 C.F.R. § 1.4(b)(6).

²⁰ *See* 24 C.F.R. § 8.4(b)(5).

²¹ *See* 28 C.F.R. § 35.130(b)(4); 28 C.F.R. § 36.301.

permanently displaced has meaningful access to any public meetings regarding the project; and (c) they provide meaningful access to LEP persons to any information provided to residents including, but not limited to, any relocation notices. Generally, the PHA or Project Owner will be responsible for providing oral interpreters at meetings, including ensuring their competence, and covering any associated translation and interpretation costs.²²

- **Effective Communication for Persons with Disabilities:** Communications and materials must be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 C.F.R. § 8.6) and with 49 C.F.R. § 24.5, and as applicable, the Americans with Disabilities Act. This includes ensuring that, unless such actions would result in undue financial and administrative burdens or fundamental alterations, notices and resident meetings are provided in appropriate alternative formats as needed, e.g., Braille, audio, large type, accessible electronic communications, assistive listening devices, and sign language interpreters. Even in cases where the proposed actions may result in undue financial and administrative burdens or fundamental alterations, certain actions must still be taken. Specifically, appropriate auxiliary aids and services that would not result in such undue burdens or fundamental alterations must still be provided to ensure effective communication.
- **Accessible Meeting Facilities for Persons with Disabilities:** Pursuant to regulations implementing Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, as applicable, all programs and activities must be held in accessible locations unless doing so would result in an undue financial and administrative burden on the PHA and/or Project Owner, in which case the PHA or Project Owner must take any action that would not result in such undue burden but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity, e.g., briefings at an alternate accessible site or in-home briefing.²³ Individuals with disabilities must receive services in the most integrated setting appropriate to their needs. The most integrated setting appropriate to the needs of qualified individuals with disabilities is a setting that enables individuals with disabilities to interact with persons without disabilities to the fullest extent possible.²⁴

²² For more information about LEP obligations, see HUD's Limited English Proficiency (LEP) Frequently Asked Questions guidance at

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq#q26.

²³ In selecting locations for consultation with residents, the PHA and/or Project Owner shall be guided by the goal of maximizing participation in an integrated setting so that residents with disabilities and residents without disabilities may hear and consider each other's views. Priority shall be given to using on-site accessible locations (including, e.g., TV rooms or informal gathering places), even if doing so may require multiple sessions with smaller groups of residents. In addition, Title III of the Americans with Disabilities Act requires private entities that operate places of public accommodation, including social service establishments, leasing offices of private housing developments, and certain private housing providers, to comply with certain physical accessibility requirements which are similar to the requirements under Section 504 and Title II.

²⁴ See 28 C.F.R. part 35, Appendix B.

- **Accessibility for Persons with Disabilities Throughout the Planning and Implementation Process:** A number of accessibility requirements, including but not limited to site selection, apply to all RAD conversions, as they do to the PHA's activities regardless of the PHA's participation in RAD.²⁵ PHAs and Project Owners should also be aware that state or local laws, regulations, and codes may contain greater accessibility requirements. This Notice provides, in Appendix I, Part 2, an overview of accessibility requirements under existing law. The information in Appendix I, Part 2 is intended to assist with the PHA's or Project Owner's compliance with accessibility requirements. PHAs and Project Owners must review Appendix I, Part 2 early-on in planning for the RAD transaction. PHAs and Project Owners may determine that it is most efficient to address accessibility matters early in the project planning. In addition, PHAs and Project Owners must evaluate, throughout the transaction and based on the facts of their situation, which requirements are applicable in which situations to ensure they appropriately address accessibility requirements. PHAs and Project Owners are responsible for ensuring that the architectural drawings and construction comply with the PHA's and Project Owner's obligations and all Federal civil rights requirements, including accessibility requirements under the Fair Housing Act, Section 504, and the ADA.

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

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

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

²⁵ For more detailed information on these laws and their requirements, see PIH Notice 2010-26, issued July 26, 2010 (available at <http://www.hud.gov/offices/pih/publications/notices/10/pih2010-26.pdf>). While this notice has an expiration date in 2011, because the notice summarizes and discusses regulatory requirements, the information in the notice provides helpful guidance.

- Reasonable Accommodations in Rules, Policies, Practices and Services:** Under the Fair Housing Act, the PHA or Project Owner must make reasonable accommodations in rules, policies, practices, and services when such accommodations may be necessary to afford a person with a disability an equal opportunity to use and enjoy a dwelling.²⁶ Under Section 504, the PHA or Project Owner must also make reasonable accommodations to residents with disabilities, which may include providing and paying for structural modifications to dwelling units and public or common use areas. Titles II and III of the ADA provide similar requirements. Common examples of reasonable accommodations that may occur during relocation are permitting an individual with a disability to relocate near public transportation, providing a unit larger than otherwise permitted for a live-in aide, and making exceptions to no-animal rules for assistance and service animals. Accommodations generally need not be made where providing such an accommodation would be an undue financial and administrative burden or a fundamental alteration of the nature of the service. However, reasonable accommodations must be made to the extent the accommodation does not impose an undue financial and administrative burden or a fundamental alteration of the nature of the service. Reasonable accommodations must follow the individual with the disability throughout the RAD process, including during relocation. Furthermore, PHAs and Project Owners may be required to provide particular reasonable accommodations during relocation, such as assistance moving household items.²⁷
- Physical Changes to Dwelling Units, Public and Common Use Areas and Other Facilities for Accessibility:** Under the Fair Housing Act, the PHA or Project Owner may be required to permit reasonable modifications. A reasonable modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. Reasonable modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. A request for a reasonable modification may be made at any time during the tenancy. When relocating an individual with a disability who has such modifications in their dwelling unit or public and common use areas because of the individual's disability, regardless of who made them, the PHA or Project Owner has an obligation to provide and pay for such modification in the new dwelling. When considering requests by individuals with disabilities for structural changes to units or public and common use areas, PHAs and Project Owners should take particular note that they may be required to make and pay for such structural modifications as reasonable

²⁶ For additional information regarding reasonable accommodations under the Fair Housing Act, *see* the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Reasonable Accommodations Under the Fair Housing Act (May 17, 2004), at <http://www.hud.gov/offices/fheo/library/huddojstatement.pdf>.

²⁷ *See* 49 C.F.R. part 24, Appendix A, § 24.2(a)(8)(vii), which states that under the URA, "Reasonable accommodation of a displaced person with a disability at the replacement dwelling means the Agency is required to address persons with a physical impairment that substantially limits one or more of the major life activities. In these situations, reasonable accommodation should include the following at a minimum: Doors of adequate width; ramps or other assistance devices to traverse stairs and access bathtubs, shower stalls, toilets and sinks; storage cabinets, vanities, sink and mirrors at appropriate heights. Kitchen accommodations will include sinks and storage cabinets built at appropriate heights for access. The Agency shall also consider other items that may be necessary, such as physical modification to a unit, based on the displaced person's needs."

accommodations under Section 504 and because of similar requirements under the ADA even though the Fair Housing Act may only require the owner to allow such changes to be made and paid for by the individual with a disability. Before determining that they are not required to make or pay for structural changes, PHAs and Project Owners are encouraged to consider carefully their obligations under each applicable statute.

SECTION 5. Application of Key Fair Housing and Civil Rights Requirements to RAD Transactions

The generally applicable fair housing and other civil rights requirements described above, and in Appendix I, apply throughout the planning and implementation of a RAD transaction and the PHA is responsible for ensuring compliance with these requirements. As key requirements may be misunderstood, the RAD program has established specific additional procedures to assist RAD participants to ensure they comply with the applicable requirements. Specifically, the RAD Notice established a civil rights eligibility review and criteria for front-end civil rights reviews.

This Section elaborates on these requirements from the RAD Notice. The front-end review procedures described below establish procedures and criteria for the supplemental front-end review and technical assistance, criteria which are specific to the RAD program. Criteria for this supplemental front-end review are informed by, but not the same as, fair housing or civil rights rules and policies generally.

This Section is organized to loosely follow the stages of a RAD conversion transaction, beginning with RAD eligibility and continuing through site selection, transfer of assistance, unit design requirements and marketing. In addition, this Section describes the timing and procedures for submitting data and documents to HUD so that HUD may complete its front-end review. The submission procedures are also designed to serve as a tool for PHAs to identify issues of potential concern at appropriate stages of the RAD conversion and as a tool for HUD to identify potential needs for technical assistance.

5.1. RAD Eligibility Review

To be eligible for RAD, the PHA must meet all eligibility requirements set forth in Section 1.3 of the RAD Notice, including the civil rights threshold requirements found at Section 1.3.G of the RAD Notice. A PHA must not have a charge, cause determination, lawsuit, or letter of findings, referenced in Section 1.3.G of the RAD Notice, against the PHA itself, its transferees, proposed development partners, or sub-recipients that has not been resolved, or is not in the process of being resolved, to HUD's satisfaction. This determination shall be made prior to issuance of the CHAP.

The CHAP may be revoked by HUD if HUD determines that the terms of the conversion would be inconsistent with fair housing and civil rights laws or a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement. HUD may terminate a CHAP or RCC if it determines that the terms of the conversion would be inconsistent with fair housing or civil rights laws or is inconsistent with, would hinder, or would delay satisfaction of a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement.

HUD may terminate an approval to proceed with a RAD conversion if it determines that the terms of the conversion would be inconsistent with fair housing or civil rights laws or a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement.

5.2. PHA's Proposed Site Selection and Certification

For all RAD conversions, the PHA must comply with all applicable site selection requirements as set forth in this Notice and the RAD Notice and in accordance with any additional applicable published guidance provided by HUD. As set forth in the RAD Notice, conversions of assistance to PBV involving new construction, whether on a new site or on a current site, are subject to the site selection standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (e), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2). All other conversions to PBV, including transfers of assistance to an existing property other than the Converting Project, are subject to the standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (d), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2).²⁸ Site selection requirements set forth at Appendix III of the RAD Notice apply to RAD conversions to PBRA assistance, as does the requirement not to place housing in neighborhoods with highly concentrated poverty based on the criteria formulated for transfers under Section 8(bb) of the United States Housing Act of 1937.²⁹ PBV and PBRA site selection must also be consistent with the requirements of the Fair Housing Act, Title VI, Section 504, the ADA and their implementing regulations.

It is the PHA's responsibility to ensure that the site selection complies with all applicable site selection requirements, including the requirements of this Notice and the RAD Notice. Pursuant to the RAD Notice, the PHA must certify with the submission of its Annual Plan, Significant Amendment to its Annual Plan, or MTW Plan that it complies with the applicable site selection requirements and must maintain records of its analysis and the data relied upon in making its determination of compliance. The PHA must also determine and subsequently state in the certification that the site is "suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto."³⁰ Although this Notice provides detail regarding certain civil rights-related site and neighborhood standards, PHAs must certify compliance with all applicable site and neighborhood standards.³¹

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

²⁸ See the provisions of Section 1.6.A.4 of the RAD Notice.

²⁹ 42 U.S.C. § 1437f(bb).

³⁰ For RAD conversions to PBRA, the RAD Notice uses the term "the site and neighborhood is suitable," rather than "the site is suitable." See Appendix III of the RAD Notice, paragraph (a).

³¹ See 24 C.F.R. § 983.57 and the RAD Notice at Section 1.4(A)(7)

requirements described in 24 C.F.R. § 8.4(b)(5).³² The Fair Housing Act, as implemented at 24 C.F.R. § 100.205, requires “covered multifamily dwellings” built for first occupancy after March 13, 1991, to contain accessible design features. HUD’s Section 504 regulations at 24 C.F.R. § 8.4(b)(5) require that, in determining the site or location of a federally assisted facility, an applicant for assistance or recipient may not make selections the purpose or effect of which would: (i) exclude qualified individuals with disabilities from, deny them the benefits of, or otherwise subject them to discrimination under, any program or activity that receives Federal financial assistance from HUD, or (ii) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities. Title II of the ADA contains a similar requirement that a public entity, such as the PHA, may not, in determining the site or location of a facility, make selections (i) that have the effect of excluding individuals with disabilities from, denying them the benefits of, or otherwise subjecting them to discrimination; or (ii) that have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the service, program, or activity with respect to individuals with disabilities.³³ Factors relevant to a site review under these standards may include, among others:

- Site features, such as inaccessible slopes in routes, lack of accessible sidewalks, curb ramps, accessible parking spaces, and placement of dumpsters or other physical features that would impede access to and movement within the site;
- Building features, such as inaccessible building entrances, other methods of ingress and egress, public and common use areas (e.g., the rental office, parking areas, mail areas, trash areas, community rooms, shared use toilet rooms, laundry facilities and walkways inside and outside that connect these public and common use areas to units), and barriers to access by members of the public; and
- Lack of accessible transit or para-transit and accessible public sidewalks and accessible transportation stops.

When such conditions are present at the site and would exclude individuals with disabilities from, deny them the benefits of, or otherwise subject them to discrimination, or would defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to individuals with disabilities, the site must not be selected unless the proposal includes remediation of the barriers to achieve compliance with accessibility requirements (including identification and remediation of any nonconforming design and construction conditions in “covered multifamily dwellings” under the Fair Housing Act). Remediation of the barriers may include, for example, physical accessibility improvements to the site, arrangements for access to accessible supportive services, or reasonable accommodations for current or prospective residents with disabilities, including members of the public. The Financing Plan submitted to HUD must describe and document resources sufficient to pay for the remediation of accessibility barriers.³⁴

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

³³ See 28 C.F.R. § 35.130(b)(4).

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

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

5.3. RAD Front-End Civil Rights Transaction Review

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

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

A) Activities Subject to Front-End Civil Rights Review

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

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

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

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

- (2) Transfers of assistance where all or a portion of the Converting Project's assistance is transferred to a new site(s) (either new construction or to an existing project) as part of the subject transaction. Front-end review of this activity shall be pursuant to Section 5.5(B), below and, in addition, the PHA shall certify in its Annual Plan compliance with site and neighborhood standards applicable to existing housing as described in Section 5.2.
- (3) Conversions of assistance where the total number of units in the Covered Project is less than the original number of units in the Converting Project (this includes de minimis reductions). Front-end review of this activity shall be pursuant to Section 5.6.
- (4) Conversions of assistance where the Covered Project's unit configuration is different from the unit configuration of the Converting Project. Front-end review of this activity shall be pursuant to Section 5.6.
- (5) Conversions involving a change in occupancy, where the Covered Project serves a different population from the one served by the Converting Project (e.g., when a Converting Project serves families but the Covered Project is subject to an elderly preference or introduction of restrictions or preferences based on age or disability that will change the occupancy of the property). Front-end review of this activity shall be pursuant to Section 5.6.
- (6) Conversions of assistance in which the construction schedule indicates that relocation is likely to exceed 12 months. Front-end review of this activity shall be pursuant to Section 5.7(A).
- (7) Conversions of assistance involving new construction or substantial alteration,³⁵ as those terms are defined in Section 504 of the Rehabilitation Act of 1973. Front-end review of this activity shall be pursuant to Section 5.7(B).
- (8) Conversions of assistance involving a Converting Project subject to a Voluntary Compliance Agreement or Conciliation Agreement with HUD or a Consent Decree or Settlement Agreement with the U.S. Department of Justice or HUD, or where the PHA is subject to such an agreement affecting its entire housing portfolio or otherwise related to the Converting Project. Front-end review of this activity shall be pursuant to Section 5.7(C).

³⁵ Section 504 defines substantial alteration of a housing project as alterations where a housing project has 15 or more units, and the rehabilitation costs will be 75% or more of the replacement cost of the completed facility. *See* 24 C.F.R. § 8.23 (a).

- (9) Conversions of assistance where HUD has identified potential fair housing and civil rights concerns or a history of such concerns. Front-end review of this activity shall be pursuant to Section 5.7(C).

PHAs should note that a proposed RAD conversion may trigger front-end review regarding more than one of the activities listed in subsections (1) through (9) of this Section. For example, depending on the details of the proposal, a new construction on-site project could require review under subsections (1), (3), (4), (5), (6), and (7), or could require review under only subsections (1) and (7).

As part of HUD's review of these elements of the RAD conversion plans, HUD may require that PHAs that are carrying out portfolio or multi-phased conversions provide information on their conversion plans for other projects or subsequent phases to ensure that the overall plans for RAD conversion are consistent with civil rights and fair housing.

B) Fair Housing, Civil Rights, and Relocation Checklist

In connection with HUD's front-end fair housing and civil rights and relocation reviews described in this Section 5 and in Section 6, HUD is requiring submission of a Fair Housing, Civil Rights, and Relocation Checklist (the "Checklist"). The Checklist will facilitate the PHAs' and Project Owners' submission of necessary information to complete these reviews.³⁶ HUD anticipates that a revised Checklist, when available following Paperwork Reduction Act approval, will be separated into parts which can be submitted incrementally as the PHA and Project Owner develop the RAD transaction plans, with different elements of the Checklist applicable at different stages of the transaction planning process. For example, submissions regarding site selection for a RAD transaction involving new construction may occur well before submissions regarding a proposal to change the unit configuration.

The Checklist will outline the minimum information or documentation which HUD will need in order to review each part of the Checklist. After HUD's initial review of any portion of the Checklist, HUD may determine that the data provided in the Checklist is insufficient for HUD to complete its review, in which case HUD may require the PHA or Project Owner to provide supplemental information. The PHA should submit each part as early as possible once the information covered in the applicable part is known. All information specified in the applicable

³⁶ The Checklist is available at www.hud.gov/rad. As of the publication of this Notice, references to the Checklist refer to the existing FHEO Accessibility and Relocation Plan Checklist under OMB Approval 2577-0276. The PHA shall use the existing Checklist to provide information related to demonstrating compliance with fair housing, other civil rights, and relocation requirements (including accessibility requirements) and, as necessary, may require additional materials for HUD to complete its review, which the PHA may provide in such form as the PHA determines appropriate. Also at www.hud.gov/rad, HUD has provided a listing of information that, depending on the circumstances, HUD may require to complete different components of its front-end review. The Checklist is being revised to fully capture the submission requirements described in this Notice. The revised Checklist will be subject to Paperwork Reduction Act approval and will be posted at the website listed above when available for use.

part of the Checklist must be submitted to HUD for HUD to begin its civil rights review – partial submissions of any applicable part of the Checklist will not be accepted.³⁷

C) Timing of Front-End Review Submissions

PHAs and Project Owners are encouraged to submit applicable portions of the Checklist and information associated with a particular activity subject to front-end review as early as possible in the development of their plans. The PHA must ensure that HUD has approved all applicable parts of the Checklist prior to submission of the Financing Plan. Upon request from the PHA, HUD may, at HUD's sole discretion, permit submission of the Financing Plan prior to receipt of approval of the applicable parts of the Checklist and conditioned upon subsequent receipt of such approvals, in which event the PHA and Project Owner may proceed at their own risk.

Early approval of the site of the Covered Project is critical for RAD transaction proposals subject to front-end civil rights review involving site selection standards, specifically new construction in areas of minority concentration (see Section 5.3(A)(1)) and transfers of assistance (see Section 5.3(A)(2)). The PHA must conduct its own assessment of the site during the early stages of planning its RAD transaction. The guidance in this Notice and the Checklist are tools intended to assist the PHA in conducting its own assessment of the site.

The PHA must provide HUD with the Checklist and backup information sufficient for HUD to review the site with respect to the applicable standards. The site selection information should be provided to HUD no later than ninety (90) days following the issuance of the CHAP or, if the CHAP has already been issued as of the publication of this Notice, within ninety (90) days following publication of this Notice. In the event of a change in plans for the Converting Project that would require a front-end review of the site selection standards, the PHA must provide the Checklist and backup documentation within sixty (60) days of the change in plans. PHAs are strongly encouraged to provide front-end review submissions and secure HUD approval prior to applying for LIHTCs or taking action the reversal of which (in the event of non-approval of the site) would be detrimental to the PHA or the Project Owner. PHAs are also encouraged to contact FHEO for technical assistance prior to submission of these materials.

All PHAs shall submit a certification consistent with the requirements of Section 5.2, above. This certification may be prepared specifically in connection with the Checklist or as part of the PHA Annual Plan or Significant Amendment. However, HUD will not consider a submission complete for front-end civil rights review without this certification. All RAD conversions must submit the PHA certification described in Section 5.2 no later than at the time of submission of the Financing Plan.

D) Completion of HUD's Front-End Review

HUD will not approve a RAD conversion if HUD determines that the conversion would operate to discriminate in violation of applicable fair housing and civil rights laws. HUD will not approve proposals that have the purpose, intent, or effect of discriminating on the basis of

³⁷ The Checklist refers to the existing FHEO Accessibility and Relocation Checklist until a revised Checklist is approved for use pursuant to the Paperwork Reduction Act.

protected class (*i.e.*, race, color, national origin, religion, sex, disability, and familial status). If HUD does not approve a proposed activity based on a front-end review, then it will provide a written description of concerns or deficiencies. The PHA may resubmit the front-end review materials with a changed proposal and/or with additional information addressing HUD's concerns and any deficiencies in the proposal or the submission.

In some circumstances, a special condition to the transaction's RCC will be necessary to ensure that a RAD transaction conforms to fair housing and civil rights requirements. Special conditions to the RCC reflect the conditions necessary in order to complete the RAD conversion. For example, if there is an outstanding remedial agreement or order requiring particular development activities or operating policies to correct a violation of a fair housing or other civil rights requirement, the RCC generally will condition participation in RAD upon agreement by the PHA or the Project Owner, as applicable, to comply with the provisions of such agreements or orders after conversion.

5.4. Front-End Civil Rights Review for RAD Transactions Involving New Construction

A) Conditions Triggering Review

If the proposed project is located in an area of minority concentration, the new site may be approved only if it falls under a permitted exception and meets the other site selection requirements described in Section 5.2. Under the PBV and PBRA site and neighborhood standards, HUD may approve new construction in an area of minority concentration, consistent with the regulatory requirements cited above, only if:

- a. Sufficient, comparable housing opportunities for minority families in the income range to be served by the proposed project exist outside areas of minority concentration; or
- b. The project is necessary to meet overriding housing needs that cannot be met in that housing market area.³⁸

As described in the RAD Notice and in Section 5.3(A) of this Notice, above, HUD will conduct a front-end civil rights review of the PHA's proposed site in certain circumstances. This Notice specifies that for conversions of assistance involving new construction where there are indications that the site may be located in an area of minority concentration per the criteria in subsections (i), (ii), or (iii), below (whether the construction is located on the existing public housing site or on a new site), HUD will conduct a front-end civil rights review of the site to determine whether the site is in an area of minority concentration and, if so, whether it meets one of the exceptions that would allow for new construction in an area of minority concentration.

The PHA shall submit for HUD front-end review the PHA's findings, together with backup documentation, regarding site selection when the site meets any of the following criteria:

- i. The PHA self-identifies the area of the site as an area of minority concentration,

³⁸ 24 C.F.R. § 983.57(e)(3) and Appendix III of the RAD Notice, paragraph (e).

- ii. The census tract of the site meets the extent of minority concentration described in Section 5.4(B)(1), below, or
- iii. An area comprised of the census tract of the site together with all adjacent census tracts, analyzed as a whole, meets the extent of minority concentration described in Section 5.4(B)(1), below.

If any of these three criteria is applicable, HUD will conduct a review to determine whether the site is in an area of minority concentration and, if applicable, whether the proposed site fits one of the exceptions permitting new construction in an area of minority concentration described in this Section 5.4. A proposed RAD transaction which does not meet one of these triggers must still be evaluated by the PHA and the PHA must certify compliance with the site selection requirements as described in Section 5.2, above.

A PHA seeking to undertake new construction must receive written approval from HUD of any site selection subject to front-end review prior to entering into any construction contract for that new construction.

B) Analysis of Areas of Minority Concentration

This Section sets forth the methodology that HUD will use in the analysis of the extent of minority concentration, the area of the site, and the housing market area for purposes of the RAD front-end civil rights review. As noted below, this analysis is fact specific and PHAs may submit documentation to inform HUD's analysis in cases where there is strong evidence that an alternative methodology would be more appropriate.

- (1) For purposes of RAD, a site is considered to be in an area of minority concentration when either (i) the percentage of persons of a particular racial or ethnic minority within the area of the site is at least 20 percentage points higher than the percentage of that minority group in the housing market area as a whole or (ii) the total percentage of minority persons within the area of the site is at least 20 points higher than the total percentage of minorities in the housing market area as a whole.³⁹
- (2) For purposes of RAD, the analysis of an area of minority concentration will use census tracts to approximate the "area" of the site but the analysis may consider alternate proposed geographies instead of the census tract in instances where there is strong evidence that such geography is more appropriate. Strong evidence that an alternative geography is more appropriate includes: (i) that the site is close to the edge of the census tract, (ii) that the population of the census tract is heavily influenced by the size of the Converting Project, or (iii) that the local community

³⁹ The percentage of minorities shall be calculated by subtracting the percentage of White Non-Hispanic persons in the relevant area from 100%. The analysis shall be based on the most recently available decennial census data found at http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_DP_DPDP1&src=pt. However, if such data is more than five years old, and if either the PHA or HUD requests the use of more recent data based on such party's awareness of significant and material shifts in the demographics of the relevant area in the intervening years, the analysis shall be based on the most recent American Communities Survey data.

understanding of the immediate neighborhood dictates a different boundary. Local community understanding of the immediate neighborhood is often informed by factors such as patterns of housing stock (such as different residential densities in different areas or differential housing prices for similar properties), community facilities and amenities (such as schools and commercial areas) or major geographic barriers (such as rivers or interstate highways), among other factors.⁴⁰ HUD will determine the site's "area" using the best available evidence and following the legal standards set forth in applicable case law.

- (3) For purposes of the RAD analysis under this Section 5.4, a "housing market area" is the geographic region from which it is likely that residents of housing at the proposed site would be drawn for a given multifamily housing project. A housing market area generally corresponds to, as applicable: (i) the Metropolitan Statistical Area (MetroSA); (ii) the Micropolitan Statistical Area (MicroSA); or (iii) if the site is in neither a MetroSA nor a MicroSA, either (x) the county or statistically equivalent area, or (y) the PHA's service area, whichever is larger.⁴¹ The analysis may consider a larger or smaller housing market area in instances where there is strong evidence that such housing market area is more appropriate. Strong evidence that an alternative housing market area is more appropriate may include factors such as regional employment centers and commuting patterns serving such employment centers. A PHA seeking to use an alternative housing market area must consult with HUD and establish to HUD's satisfaction that the methodology for identifying and documenting the alternative housing market area is warranted and sound.

C) *The Sufficient Comparable Opportunities Exception*

As required by the RAD Notice and noted in Section 5.4(A), one of the exceptions under which the site and neighborhood standards permit new construction in areas of minority concentration is if sufficient, comparable housing opportunities for low-income minority families exist outside areas of minority concentration. This section clarifies HUD's procedures for assessing comparable housing opportunities and evaluating how the proposed new construction will impact the balance of housing choices within and outside areas of minority concentration. It also includes a list of the information PHAs should submit to inform HUD's assessment of relevant factors, and key considerations guiding HUD's analysis of each factor.

Under the governing PBV and PBRA requirements, units are considered comparable opportunities if they are the same household type (e.g., elderly, disabled, family, large family), tenure type (owner, renter), require approximately the same total tenant payment toward rent,

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

⁴¹ Items (i) and (ii) are consistent with a Core Based Statistical Area as defined by the Office of Management and Budget. For reference, a Core Based Statistical Area consists of the county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core.

serve the same income group, are located in the same housing market area, and are in standard condition.⁴²

It is important to note that the sufficient comparable housing opportunities exception “does not require that in every locality there be an equal number of assisted units within and outside of areas of minority concentration. Rather, application of this standard should produce a reasonable distribution of assisted units each year, that, over a period of several years, will approach an appropriate balance of housing choices within and outside areas of minority concentration. An appropriate balance in any jurisdiction must be determined in light of local conditions affecting the range of housing choices available for low-income minority families and in relation to the racial mix of the locality’s population.”⁴³

HUD will assess “the overall impact of HUD-assisted housing on the availability of housing choices for low-income minority families in and outside areas of minority concentration, and must take into account the extent to which the following factors are present, along with other factors relevant to housing choice.”⁴⁴ Under this exception, it is not sufficient for one factor to be present, nor is it required that all factors be present, as the analysis must consider all relevant facts and evaluate the totality of the circumstances.

- “A significant number of assisted housing units are available outside areas of minority concentration.”⁴⁵ While HUD must consider all factors relevant to housing choice, 30% or more of deeply subsidized housing units for very low-income persons would be a significant number. To facilitate HUD’s consideration of this factor, a PHA should provide the number, occupancy type, and location of all comparable assisted units.⁴⁶
- “There is significant integration of assisted housing projects constructed or rehabilitated in the past 10 years, relative to the racial mix of the eligible population.”⁴⁷ To facilitate HUD’s consideration of this factor, a PHA should provide the name and location of assisted housing projects constructed or rehabilitated in the PHA’s jurisdiction in the past 10 years and the demographic characteristics of the residents of each of these projects;
- “There are racially integrated neighborhoods in the locality.”⁴⁸ To facilitate HUD’s consideration of this factor, a PHA should provide the name and census tracts where these racially integrated neighborhoods are located. In general, HUD will consider a neighborhood racially integrated if the neighborhood does not have a high concentration of persons of a particular race or ethnicity when compared to the housing market area in which the neighborhood is located.

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

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

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

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

⁴⁶ Note that this factor is in reference to comparable assisted units that may or may not be in the PHA’s portfolio. The presumption stated at the end of this Section (i.e., that sufficient comparable opportunities exist if at least 50% of the comparable hard units in the PHA’s portfolio, including PBV developments using the PHA’s subsidy, are outside areas of minority concentration) is focused on units within the PHA’s portfolio.

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

⁴⁸ 24 C.F.R. § 983.57(e)(3)(v)(C) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(iii).

- “Programs are operated by the locality to assist minority families that wish to find housing outside areas of minority concentration.”⁴⁹ Such programs may include measures such as increasing payment standards in excess of 110% of FMR or the use of Small Area FMRs, including in setting exception rents, or reservation of a percentage of HCVs dedicated to support choice mobility selections or implementation of proven mobility counseling and supports for residents, provided the PHA provides sufficient evidence that it will continue such measures. To facilitate HUD’s consideration of this factor, a PHA should provide the names of the applicable program(s); the entity responsible for implementing the program(s) (e.g., city, county, state government); and any information demonstrating that the program(s) has been successful or predictably will achieve success in assisting persons who wish to move to non-concentrated areas.
- “Minority families have benefited from local activities (e.g., acquisition and write-down of sites, tax relief programs for homeowners, acquisitions of units for use as assisted housing units) undertaken to expand choice for minority families outside of areas of minority concentration.”⁵⁰ To facilitate HUD’s consideration of this factor, a PHA should provide the names of the applicable activity(s); the entity responsible for implementing the activity(s) (e.g., city, county, state government); and any information demonstrating that the activity(s) has been successful in expanding choice for minority families outside of areas of minority concentration;
- “A significant proportion of minority households has been successful in finding units in non-minority areas under the tenant-based assistance programs” (e.g., the Housing Choice Voucher programs).⁵¹ To facilitate HUD’s consideration of this factor, a PHA should provide the number of minority households receiving Housing Choice Vouchers; the number of minority households using HCVs in non-minority areas; and the non-minority census tracts where the HCVs are being used. While each local situation is distinct and HUD must consider all factors relevant to housing choice, 30% or more of new leases signed by minority heads of household using HCVs located in non-minority areas over a period greater than three years prior to the date of HUD’s analysis would be a significant proportion.
- “Comparable housing opportunities have been made available outside areas of minority concentration through other programs.”⁵² To facilitate HUD’s consideration of this factor, a PHA should describe the opportunities that have been made available, the location of those opportunities, and the number of minority families that have benefitted from the program in recent years. Such programs could include choice mobility strategies, acquisition strategies to acquire and add to the PHA’s portfolio existing apartments in high opportunity areas and transfers of assistance to high opportunity areas.

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

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

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

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

⁵² 24 C.F.R. § 983.57(e)(3)(v)(G) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(vii).

determines such an analysis would assist in this evaluation, HUD will consult with appropriate parties to establish or accept an appropriate methodology for such an analysis to address HUD's civil rights concerns and to ensure appropriate independence between the analyst and the PHA or Project Owner commissioning and paying for the study.

Absent information to the contrary, for purposes of HUD's front-end review of the PHA's analysis, HUD will apply a presumption that sufficient comparable opportunities exist if at least 50% of the comparable hard units in the PHA's portfolio, including PBV developments using the PHA's subsidy, are outside areas of minority concentration.⁵³ The PHA's portfolio includes all public housing, PBV and PBRA hard units (including those developed under HOPE VI or Choice Neighborhoods) controlled by the PHA and its instrumentalities or funded using PHA-controlled subsidy. Upon adequate documentation of this presumption, the PHA need not provide additional documentation for HUD's front-end review of the sufficient comparable opportunities exception. This presumption may be rebutted by information to the contrary, including information regarding the preceding factors. In assessing whether sufficient comparable opportunities exist when the presumption does not apply, HUD will consider the factors listed above.

Absent information to the contrary, for purposes of HUD's front-end review of the PHA's analysis, HUD will apply a presumption that sufficient comparable opportunities exist if a set of RAD conversions from a single public housing property, individually or in a combination of transactions, will result in the creation of as many similarly-affordable housing units outside areas of minority concentration as are constructed on the original public housing site. To evaluate the creation of similarly-affordable units, HUD will compare (i) the number of affordable units that will be redeveloped on site, to (ii) the number of similarly-affordable housing units that will be created through new construction, imposition of new long-term affordability restrictions or transfer of RAD assistance to one or more sites outside areas of minority concentration.⁵⁴ Similarly-affordable shall mean RAD units compared to RAD units and LIHTC/non-RAD units compared to LIHTC/non-RAD units. The newly created similarly-affordable units must be owned, controlled, sponsored, under common ownership, control or sponsorship, or financially supported by the PHA or by an entity with a managing ownership interest in the Project Owner. When a PHA seeks to claim this exception, HUD prefers that the transaction creating the similarly-affordable units on the site outside areas of minority concentration close (with an immediate or delayed HAP effective date, if applicable) prior to the closing of the RAD conversion in the area of minority concentration. However, if the PHA determines that such a sequence is not reasonably possible, unless otherwise approved by HUD the PHA must provide evidence to HUD that the transfer of assistance to a site outside areas of

⁵³ When determining the percentage of units outside of areas of minority concentration, the PHA must include the number of units planned at the proposed site in its calculations. While not required, PHAs or Project Owners may assist HUD in consideration of this presumption by submitting to HUD a map produced by the Affirmatively Furthering Fair Housing Data and Mapping Tool ("AFFH-T"), as may be available on the HUD website from time to time, showing the location of publicly assisted housing.

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

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

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

D) The Overriding Housing Needs Exception

As noted in Section 5.4(A), the second exception under which the site and neighborhood standards permit new construction in areas of minority concentration is if the project is necessary to meet overriding housing needs that cannot be met in that housing market area. The new construction site selection standards under RAD⁵⁵ outline two examples of circumstances, consistent with fair housing and other civil rights objectives, that would permit the application of the overriding housing needs exception: (1) when the site is “an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood;” or (2) when the site is “located in a neighborhood experiencing significant private investment that is demonstrably improving the economic character of the area (a “revitalizing area”).”⁵⁶

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

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

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

⁵⁵ See 24 C.F.R. § 983.57(e)(2) for PBV transactions and paragraph (e) of Appendix III of the RAD Notice for PBRA transactions.

⁵⁶ 24 C.F.R. § 983.57(e)(3)(vi); see also Appendix III of the RAD Notice, paragraph (e)(1)(B)(viii)(2). In demonstrating an overriding housing need, the “neighborhood” is determined in each situation based on the overall facts and circumstances and cannot be mechanically determined. The “immediate neighborhood” is generally a smaller geographic area than the “neighborhood.”

In determining whether such an official, currently operational and realistically achievable plan for the improvement or revitalization of the area exists, HUD will consider relevant factors including, for example, whether:

- The strategy itself, or a plan supporting the strategy, has been enacted, adopted, or ratified by a municipal, county, or state legislative body;
- There has been progress to implement the plan, or the strategy as a whole.⁵⁷
- The plan or strategy as a whole, or the elements applicable to the Covered Project, are consistent with the jurisdiction's land use or zoning code, development regulations, or other official body of laws or rules;
- Strategies or activities under the plan are incorporated in current public, quasi-public agency or major institutional work plans;
- The plan, or the strategy as a whole, includes objectives and initiatives related to the preservation or restoration of a geography larger than the Converting Project and any associated public housing site;
- A jurisdiction has published solicitations or incentives for development projects in the improvement or revitalization area;
- The plan is incorporated in the applicable jurisdiction's Consolidated Plan or other comprehensive community development plan;
- A jurisdiction has explicitly designated the geographic area for improvement or revitalization (e.g., Business Improvement District; Enterprise Zone designation; Promise Zone designation; Choice Neighborhoods designation);
- An implementing agency has retained a construction firm to break ground on the improvement or revitalization; and/or
- An implementing agency has secured financing, such as the issuance of bonds or final approval for tax increment financing.

(2) Establishing that the Site is Located in a "Revitalizing Area"

Evidence that the site is located in a revitalizing area experiencing significant private investment that is demonstrably improving the economic character of the area is also an example of a site which meets an overriding housing need. HUD will consider all relevant factors in making a determination that the site is located in a "revitalizing area" but in particular will consider whether:

- i. The neighborhood has demonstrated signs of revitalization, through indicators such as low or declining census tract poverty rates, low or declining violent crime rates or evidence of high or increased educational opportunity, high or increasing median

⁵⁷ Indicators of progress should be appropriate to the amount of time since the plan or strategy was developed and there must be a reasonable, supportable expectation that the plan will continue to be implemented. For example, if a plan was launched 3-4 years prior and the initial steps of the plan required implementation of an initiative (such as real estate development) which has a long pre-development planning period, HUD may consider whether there has been activity to seek land development approvals or to develop construction drawings or to secure funding commitments or other activities providing evidence that one or more material elements of the plan or strategy are actually being implemented.

- household income, high or increasing homeownership rates and/or high or increased employment; and
- ii. There is high private and public investment in retail, commercial, or housing development that has occurred or will imminently occur in the area which may include, among other considerations:
 - Evidence of new or improved retail centers, grocery stores, pharmacies, healthcare facilities, community centers, educational and recreational facilities, municipal services, and transportation serving the neighborhood;
 - Evidence of private and public investment or housing development that has occurred or will imminently occur in the area;
 - Evidence of economic conditions that are impacting the preservation of affordable housing in the neighborhood, including indicators of gentrification such as housing costs rising more sharply in the neighborhood than in the jurisdiction overall, accelerated rates of homeownership in the neighborhood, and disproportionate depletion of larger dwellings for families with children.

(3) Circumstances in Which an Overriding Housing Needs Exception Does Not Apply

A PHA cannot establish that a site meets the overriding housing needs exception if the only reason the need cannot otherwise be feasibly met is that discrimination on the basis of race, color, religion, sex, national origin, age, familial status, or disability renders sites outside areas of minority concentration unavailable or if the use of this standard in recent years has had the effect of circumventing the obligation to provide housing choice.⁵⁸ For example, the overriding housing needs exception may not be applied if the reason that the project cannot be sited outside of an area of minority concentration is due to community opposition to the project based on the actual or perceived protected characteristics of the residents or prospective residents of the project. In addition, a recipient may not exclusively rely on this exception as a means of siting projects without creating housing opportunities outside of areas of minority concentration or without preserving existing housing outside of areas of minority concentration.

5.5. Front-End Civil Rights Review for RAD Transactions Involving Transfer of Assistance

A) Applicable Standards

Transfers of assistance are subject to the site selection standards for existing or rehabilitated housing set forth in 24 C.F.R. § 983.57(a)-(d), with the exception of 24 C.F.R. § 983.57(b)(1) and (c)(2), for PBV conversions and Appendix III of the RAD Notice for PBRA conversions. All transfers of assistance to a new site(s) are subject to front-end review by HUD, as required by the RAD Notice and noted in Section 5.3(A)(2) of this Notice. Conversions involving a transfer of assistance may also involve one or more of the other activities which trigger front-end review as described in Section 5.3(A). In transfers of assistance involving any of these activities, HUD

⁵⁸ 24 C.F.R. § 983.57(e)(3)(vi) and Appendix III of the RAD Notice, paragraph (e)(2). The PBRA site and neighborhood standards use the phrase “on the basis of race, color, creed, sex or national origin.” See Appendix III of the RAD Notice.

will conduct a front-end review based on the requirements applicable to each activity. A PHA must submit documentation for the front-end civil rights review of each specific activity as required by the relevant sections of this Notice.

B) Analysis of Transfers of Assistance

Through the front-end review of transfers of assistance by FHEO, HUD seeks to assist the PHA in avoiding discrimination on the basis of race, color, national origin, religion, sex, disability or familial status. The front-end review of transfers of assistance will apply the site selection standards for existing/rehabilitated housing.⁵⁹ This review shall consider:

- (1) The accessibility of the proposed site for persons with disabilities;
- (2) The ability of the RAD conversion to remediate accessibility concerns;
- (3) Whether the transfer of assistance would result in assisted units being located in an area where the total percentage of minority persons is significantly higher than the total percentage of minority persons in the area of the original public housing site or in an area where the percentage of persons of a particular racial or ethnic minority is significantly higher than the percentage of that minority group in the area of the original public housing site.⁶⁰ For purposes of this analysis, HUD will examine the minority concentration of:
 - (a) the census tract of the original public housing site compared to the census tract of the proposed site; and
 - (b) an area comprised of the census tract of the original public housing site together with all adjacent census tracts compared to an area comprised of the census tract of the proposed site together with all adjacent census tracts.
- (4) Whether the site selection has the purpose or effect of:
 - (a) Excluding individuals from, denying them the benefits of, or subjecting them to discrimination under the RAD program or the applicable rental assistance program;
 - (b) Excluding qualified individuals with disabilities from or denying them the benefit of the RAD program or the applicable rental assistance program, or otherwise subjecting them to discrimination;
 - (c) Defeating or substantially impairing the accomplishment of the objectives of the RAD program or the applicable rental assistance program with respect to qualified individuals with disabilities; and

⁵⁹ 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, paragraphs (a) through (d). The site selection standards for existing/rehabilitated housing do not apply the minority concentration test used for new construction found at 24 C.F.R. § 983.57(e)(3) and Appendix III of the RAD Notice, paragraph (e).

⁶⁰ While this review is not explicitly called out in 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, it is derived from HUD's and the PHA's obligations to comply with civil rights laws and regulations, including those referenced in 24 C.F.R. § 983.57(b)(2) and Appendix III of the RAD Notice.

- (d) Excluding individuals with disabilities (including members of the public with disabilities), denying them benefits or subjecting them to discrimination.

Under the RAD Notice, there are other standards for review of a transfer of assistance which are not examined as part of the front-end civil rights review but are examined as part of the RAD Financing Plan review (e.g., criteria formulated for transfers under Section 8(bb) of the United States Housing Act of 1937 regarding neighborhoods with highly concentrated poverty). Identification of considerations for the front-end review do not preclude review by HUD of all standards referenced in the RAD Notice.

5.6. Front-End Civil Rights Review for RAD Transactions Involving Reduction in Number of Units, Changes in Bedroom Distribution of Units and Changes in Occupancy Requirements

The RAD Notice allows PHAs to reduce the number of units, change the bedroom distribution of units, or change the occupancy of projects as part of their RAD conversion.⁶¹ However, the RAD Notice also provides that such changes (including de minimis changes) must undergo a front-end civil rights review and receive approval from HUD prior to submission of the Financing Plan. The Checklist will require data for review along with an explanation, backed by sufficient evidence, of how the PHA determined that that the proposed change will not result in discrimination on the basis of race, color, national origin, religion, sex, disability, familial status, actual or perceived sexual orientation, gender identity or marital status.⁶²

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

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

⁶¹ See Sections 1.4.A.4 and 1.4.A.10 of the RAD Notice.

⁶² Reductions in the number of units, changes in the bedroom distribution of units, or changes in occupancy violate the Fair Housing Act (the Act) if they have a discriminatory effect on the basis of race, color, national origin, religion, sex, disability, or familial status. Unlawful housing discrimination may be established by a policy's or practice's discriminatory intent or by its discriminatory effect, even if not motivated by discriminatory intent, consistent with the standards outlined in 24 C.F.R. § 100.500. A policy or practice can have an unjustified discriminatory effect, even when the provider had no intent to discriminate. Under this standard, a facially-neutral policy or practice that has a discriminatory effect violates the Act if it is not supported by a legally sufficient justification. In addition, the policy or practice violates the Act if the housing developer or provider intentionally discriminates, including for example, by reducing the number of bedrooms with the intent of limiting families with children. Furthermore, the policy or practice may also violate the Act where it creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin. In addition, any changes must conform with the Equal Access rule requirement that determinations of eligibility for housing that is assisted by HUD or subject to a mortgage insured by the FHA shall be made in accordance with program eligibility requirements, and the housing must be made available, without regard to actual or perceived sexual orientation, gender identity or marital status. 24 C.F.R. § 5.105(a)(2).

Similarly, replacing larger units with smaller units so as to exclude families with children would be unlawful discrimination because of familial status.

Additionally, reductions in units or changes in bedroom distribution must not have an unjustified discriminatory effect on members of a protected class. For example, a reduction in units could have a discriminatory impact if it excludes members of a particular race or religion. Reductions or changes that have a disparate impact on a protected class are unlawful under the Fair Housing Act if they are not necessary to achieve a substantial, legitimate, nondiscriminatory interest of the developer or housing provider, or if such interest could be served by another practice that has a less discriminatory effect.

The RAD Notice allows for a de minimis reduction in units at Converting Projects, which includes both a small number of units as well as the reduction of certain units that have been vacant for 24 months prior to application, that are being or will be used for social service delivery, or efficiencies that will be reconfigured to one-bedroom units.⁶³ In addition, a PHA converting multiple properties can consolidate the de minimis reductions derived from multiple properties at a small number of sites. The RAD Notice also allows for changes in bedroom distribution. Such de minimis reductions are still subject to front end civil rights review and applicable fair housing and civil rights laws.

HUD shall conduct a front-end civil rights review if the plan for a Converting Project results in:

- A reduction in the number of dwelling units in any of the following categories: (i) units with two bedrooms, (ii) units with three bedrooms or (iii) units with four or more bedrooms.
- A reduction in the number of UFAS accessible units;
- An increase in the number of UFAS accessible units for persons with mobility impairments beyond 10% of the units in the Covered Project or 1 unit, whichever is greater.
- An increase in the number of UFAS accessible units for persons with vision and hearing impairments beyond 4% of the units in the Covered Project or 1 unit, whichever is greater.

When a Converting Project is subject to a front-end civil rights review under this subsection, the PHA shall submit to HUD the relevant part of the Checklist together with a justification which must demonstrate that the changes are not the result of discriminatory intent and will not have a discriminatory effect on members of protected classes, particularly families with children and individuals with disabilities. Relevant data for this analysis of the proposed change at the project may include the PHA's overall affordable housing stock, the demand for affordable housing in the market as evidenced by information such as the overall jurisdiction and regional demographic data available from the AFFH Data and Mapping Tool (e.g., both basic demographic and disproportionate housing needs data), the PHA's waiting list or a reliable market study of households seeking assisted housing, compared to the relative proportions of

⁶³ See Section 1.4.A.4 of the RAD Notice.

units serving any particular household type in the proposed project, the PHA's total housing stock or all assisted housing in the area.

For any increase in UFAS units subject to front-end review, HUD will assess indicators of local need (see Section 5.7(B), below) and whether the change would operate to concentrate individuals with disabilities in a particular property or to exclude individuals with certain types of disabilities from a particular property.

B) Review of Changes in Occupancy Type

RAD conversions that result in the implementation of an admissions preference (e.g., residency preferences or restrictions) at the Covered Project that would alter the occupancy of the property (e.g., family units converting to elderly units, elderly/disabled units converting to elderly only units) are subject to a front-end civil rights review by HUD pursuant to the RAD Notice and Section 5.3(A). A PHA must demonstrate that the proposed change in occupancy type is consistent with the demand for affordable housing in its jurisdiction as demonstrated by factors such as the demographics of its current occupancy, the demographics of its waiting list or a market study. Such preferences, restrictions, or geographic residency preferences must be reflected in a PBRA project's Affirmative Fair Housing Marketing Plan (AFHMP) or, for a PBV project, the PHA's Administrative Plan.

5.7. Other Front-End Civil Rights Review for RAD Transactions

A) Conversions of Assistance in Which the Construction Schedule Indicates that Relocation is Likely to Exceed 12 Months.

The front end civil rights review shall focus on whether the relocation will result in discrimination on the basis of race, color, national origin, religion, sex, disability, and familial status, based primarily, but not exclusively, on the data required in the Checklist.

B) Conversions of Assistance Involving New Construction or Substantial Alteration, as those terms are defined by Section 504.

While the PHA is responsible for compliance with all requirements described in Section 4, above and in this subsection, the front-end review will be conducted based on a review of the Checklist and shall include confirming the provision of any required accessible units and confirming the PHA is applying the appropriate accessibility standards. HUD will require the PHA to provide information regarding the provision of at least the minimum number of units accessible for persons with mobility impairments and units accessible for persons with hearing and vision impairments as required by applicable law (generally 5% of units accessible for persons with mobility impairments and an additional 2% of units accessible for persons with hearing and vision impairments). For purposes of establishing an upper threshold of accessible units below which RAD front-end review will not be required, HUD will accept that up to 10% of units accessible for persons with mobility impairments and up to 4% of units accessible for persons with hearing and vision impairments is consistent with local need, without further review, absent information to the contrary. HUD will consider a PHA's request for higher percentages based, to HUD's satisfaction, on reliable indicators of local need, such as census data or other available current data. HUD is available to assist PHAs in determining appropriate indicators of local

need for units with accessible features. The RAD conversion scope of work submitted with the Financing Plan must reflect the construction or retrofitting of residential units and public and common use areas to comply with all applicable accessibility requirements.

C) Remedial Agreements and Orders.

Front-end review in situations where the Converting Project or PHA is subject to enforcement actions or binding voluntary compliance agreements, settlement agreements, conciliation agreements, or consent decrees or orders of the nature described in Sections 5.3(A)(8) and 5.3(A)(9) shall be conducted on a case-by-case basis as appropriate to the specific situation.

5.8. Affirmative Fair Housing Marketing Plan (AFHMP) Requirements for Projects Converting to PBRA Assistance

For all projects converting to PBRA assistance, a PHA or Project Owner must complete form HUD-935.2A, the Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing, and submit it to HUD for approval with the RAD Financing Plan.⁶⁴ Affirmative Fair Housing Marketing requirements are designed to achieve a condition in which individuals of similar income levels in the same housing market area have similar housing choices available to them regardless of their race, color, national origin, religion, sex, disability, or familial status.⁶⁵ They are also a means to carry out the mandate of Section 808(e)(5) of the Fair Housing Act that HUD administer its programs and activities in a manner to affirmatively further fair housing. These requirements mandate that PHAs or Project Owners identify groups that are least likely to apply for upcoming housing opportunities and to implement special marketing and outreach activities to ensure that these groups are aware of these opportunities.

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

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

⁶⁴ The most recent version of the AFHMP is HUD Form 935.2A, OMB Approval Number 2529-0013. *See* 24 C.F.R. § 880.601(a)(2) and 24 C.F.R. § 200.615; *see also* Section 10.8 of the Multifamily Accelerated Processing (MAP) Guide. The PHA or its management agent should consult the instructions in the form HUD 935.2A and HUD's Implementing Affirmative Fair Housing Marketing Requirements Handbook (HUD Handbook 8025.1) for guidance on completing the AFHMP and carrying out an affirmative marketing program. The Handbook provides a detailed resource on the content of the AFHMP, which includes marketing activities, residency preferences, and staff training.

⁶⁵ *See* 24 C.F.R. § 200.610.

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

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

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

SECTION 6. RELOCATION REQUIREMENTS

In some cases, as explained in this Section, the activities associated with the RAD transaction may require the relocation of residents. In the event of acquisition, demolition, construction or rehabilitation activities performed in connection with a RAD conversion, the PHA and/or Project Owner⁶⁶ should plan such activities to reasonably minimize any disruption to residents’ lives, to ensure that residents are not exposed to unsafe living conditions and to comply with applicable relocation, fair housing and civil rights requirements. As discussed in Section 6.1, below, a written relocation plan is required in some circumstances and strongly encouraged for any conversion resulting in resident moves or relocation. Further, the obligations due to relocating residents under RAD are broader than URA relocation assistance and payments and RAD specifies requirements which are more protective of residents than standard URA requirements, including additional notices (see Section 6.6) and a right to return (see Section 6.2). This Notice requires that certain information be provided to all households, beginning prior to submission of the RAD application.

Any resident who moves as a direct result of acquisition, rehabilitation or demolition for an activity or series of activities associated with a RAD conversion may, depending on the circumstances and length of time of the relocation, be eligible for relocation assistance and payments under the URA. Additionally, Section 104(d) relocation and one-for-one replacement

⁶⁶ Under the URA, the term “displacing agency” refers to the agency or person that carries out a program or project which will cause a resident to become a displaced person. Projects vary and, for any specific task described in this Notice, the displacing agency may be either the PHA or the Project Owner, as determined by the allocation of roles and responsibilities between the PHA and Project Owner.

housing requirements may also apply when CDBG- or HOME-funds are used in connection with a RAD conversion. The applicability of the URA or Section 104(d) to RAD conversions is fact-specific, which must be determined in accordance with the applicable URA and Section 104(d) regulations.⁶⁷

Eligibility for specific protections under this Notice applies to any person residing in a Converting Project who is legally on the public housing lease, has submitted an application to be added to an existing lease, or is otherwise in lawful occupancy at the time of the issuance of the CHAP and at any time thereafter until conversion of assistance under RAD. All such residents of a Converting Project have a right to return and are eligible for relocation protections and assistance as provided by this Notice. The eligibility criteria set forth in this paragraph apply to the protections under this Notice regardless of whether residents or household members meet the statutory and regulatory requirements for eligibility under URA.⁶⁸

6.1. Planning

If there is a possibility that residents will be relocated as a result of acquisition, demolition, or rehabilitation for a Converting Project, PHAs must undertake a planning process in conformance with the URA statutory and regulatory requirements in order to minimize the adverse impact of relocation (*see* 49 § C.F.R. 24.205). PHAs must also ensure that their relocation planning is conducted in compliance with applicable fair housing and civil rights requirements.

The PHA shall prepare a written relocation plan if the RAD conversion involves permanent relocation (including, without limitation, a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than one year. While a written relocation plan is not required for temporary relocation lasting one year or less, HUD strongly encourages PHAs, in consultation with any applicable Project Owners, to prepare a written relocation plan for all RAD conversions to establish their relocation process clearly and in sufficient detail to permit consistent implementation of the relocation process and accurate communication to the residents. Appendix II contains recommended elements of a relocation plan.

During the planning stages of a RAD transaction and based on the results of this planning process, a PHA must submit applicable portions of the Checklist described in Section 5.3(B) to HUD, together with any required backup documentation, as early as possible once the information covered in the applicable part is known.⁶⁹ All parts of the Checklist must be submitted to HUD prior to submission of the Financing Plan. The Checklist will allow HUD to assist the PHA to comply, and to evaluate the PHA's compliance, with relocation requirements, including civil rights requirements related to relocation.

⁶⁷ 42 U.S.C. § 4601 *et seq.*, 42 U.S.C. § 5304(d), and their implementing regulations at 49 C.F.R Part 24 and 24 C.F.R. Part 42 subpart C.

⁶⁸ A nonexclusive listing of persons who do not qualify as displaced persons under URA is at 49 C.F.R. 24.2(a)(9)(ii). See also, Paragraph 1-4(J) of HUD Handbook 1378. See Section 6.5 of this Notice for discussion of the date of "initiation of negotiations."

⁶⁹ The Checklist refers to the existing FHEO Accessibility and Relocation Checklist until a revised Checklist is approved for use pursuant to the Paperwork Reduction Act.

The following presents a general sequencing of relocation planning activities within the RAD conversion process for informational and planning purposes only. Specific requirements are set forth in the provisions of this Notice.

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

⁷⁰ Alternatively, the PHA may submit a new PHA Five-Year or Annual Plan, especially if it is on schedule to do so. Under any scenario, the PHA must consult with the Resident Advisory Board and undertake the community participation process.

Stage	Activities
	described in Section 6.6(C) through 6.6(E) of this Notice at this time.
5. From RAD Conversion Commitment (RCC) to Closing	<ul style="list-style-type: none"> • Meet with residents to describe approved conversion plans and discuss required relocation. • The effective date of the RCC marks the date of “Initiation of Negotiations” (ION), as defined in the URA (49 § C.F.R. 24.2(a)(15)). • If no NOIA was provided while preparing the Financing Plan, provide residents with appropriate relocation notices as described in Section 6.6(C) through 6.6(E) of this Notice. • Resident relocation may begin following the effective date of the RCC, subject to applicable notice requirements.
6. Post-Closing	<ul style="list-style-type: none"> • Ongoing implementation of relocation • Notify the residents regarding return to the Covered Project as described in Section 6.6(F) of this Notice • Implementation of the residents’ right to return

6.2. Resident Right to Return

Any public housing or Section 8 assisted resident that may need to be relocated temporarily to facilitate rehabilitation or construction has a right to return to an assisted unit at the Covered Project once rehabilitation or construction is complete.⁷¹ Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a project’s conversion of assistance. The Project Owner satisfies the RAD right to return to a Covered Project if the Project Owner offers the resident household either: a) a unit in the Covered Project in which the household is not under-housed; or b) a unit in the Covered Project which provides the same major features as the resident’s unit in the Converting Project prior to the implementation of the RAD conversion. In the case of a transfer of assistance to a new site, residents of the Converting Project have the right to reside in an assisted unit meeting the requirements set forth in this paragraph at the Covered Project (the new site) once the Covered Project is ready for occupancy in accordance with applicable PBV or PBRA requirements.

If proposed plans for a Converting Project would preclude a resident from returning to the Covered Project, the resident must be given an opportunity to comment and/or object to such plans. Examples of project plans that may preclude a resident from returning to the Covered Project include, but are not limited to:

- Changes in bedroom distribution which decrease the size of units such that the resident would be under-housed;⁷²

⁷¹ The right to return is not a right to any specific unit in the Covered Project. Tenancies other than public housing or Section 8 assisted residents (such as commercial tenants) do not hold a right to return and are subject to standard relocation requirements applicable to such tenants under the URA.

⁷² See the RAD Notice for a description of the procedures that must be undertaken if a resident is over-housed.

- Where a) the PHA is reducing the number of assisted units at a property (if authorized to do so under Section 1.5.B of the RAD Notice) and b) the resident cannot be accommodated in the remaining assisted units;
- The imposition of income eligibility requirements, such as those associated with LIHTC or other program financing, under which the current resident may not be eligible;⁷³ and
- Failure to provide reasonable accommodation to an individual with disabilities, in violation of applicable law, which reasonable accommodation may include installation of accessibility features that are needed by the individual with disabilities.⁷⁴

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

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

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

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

⁷³ In these cases, a PHA may elect to exclude some units from the applicable financing program, for example, claiming LIHTC for a subset of the units and not claiming tax credits in connection with the units occupied by households over the LIHTC maximum eligibility of 60% of AMI.

⁷⁴ Refer to the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Reasonable Modifications Under the Fair Housing Act (March 5, 2008), at http://www.hud.gov/offices/fheo/disabilities/reasonable_modifications_mar08.pdf for additional detail regarding applicable standards for reasonable accommodations and accessibility features which must be provided. If the resident has paid for installation of accessibility features in the resident's prior unit, the PHA or Project Owner shall pay for the installation of comparable features in the new unit. Violations of law may also result in other sanctions.

Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and Titles II and III of the Americans with Disabilities Act.

6.3. Admissions and Continued Occupancy Requirements

Resident households may not be denied relocation housing or the right to return based on rescreening, income eligibility, or income targeting. PHAs may only offer housing options with screening, income eligibility or income targeting requirements if the impacted residents meet the admission and occupancy policies applicable to such housing. However, whether or not in a temporary relocation situation, the household remains subject to the applicable program policies regarding continued occupancy of an assisted unit by an incumbent resident of the unit.

6.4. Types of Moves and Relocation

Any time project plans require a resident to move from their current unit, the resident is eligible for assistance as described in this Notice. Assistance may vary depending on the options provided to residents, whether the relocation is temporary or permanent and, if applicable, the length of time the resident is in temporary accommodations.⁷⁵ In all circumstances, the move or relocation must be in compliance with applicable requirements of this Notice and consistent with applicable fair housing and civil rights requirements. Each type of move is discussed below.

A) Moves within the same building or complex of buildings⁷⁶

Temporary or permanent moves within the same building or complex of buildings may be appropriate given the extent of work to be completed to permit phasing of rehabilitation or construction. Moves within the same building or complex of buildings are not considered relocation under RAD and a tenant generally does not become displaced under the URA. Whether permanent (i.e., the tenant will move to and remain in an alternative unit) or temporary (i.e., the tenant will move to another unit and return to their original unit), the PHA or Project Owner must reimburse residents for all reasonable out-of-pocket expenses incurred in connection with any move and all other terms and conditions of the move(s) must be reasonable.⁷⁷ The final move must be to a unit which satisfies the right to return requirements specified in Section 6.2 of this Notice.

⁷⁵ PHAs should note that the definitions of “permanent” vary between the URA and RAD. For example, “permanent displacement” under the URA includes moves from the original building or complex of buildings lasting more than one year. The RAD Notice, meanwhile, considers “permanent relocation” to be separation from the RAD-assisted unit upon completion of the conversion and any associated rehabilitation and construction. The duration of a temporary move may exceed one year. In the case of a transfer of assistance, it is not permanent relocation under RAD when the resident must move from the original complex of buildings to the destination site in order to retain occupancy of the RAD-assisted unit.

⁷⁶ An example of relocation within the same building or complex of buildings would be if one floor of a multi-story building is vacant, and the PHA is moving residents from another floor to the vacant units.

⁷⁷ Failure to reimburse residents for moving or other out-of-pocket expenses and any other terms and conditions of the move which may be unreasonable may result in the resident becoming a displaced person under the URA if the resident subsequently moves from the property.

B) Temporary relocation lasting one year or less

If a resident is required to relocate temporarily, to a unit not in the same building or complex of buildings, for a period not expected to exceed one year in connection with the RAD conversion, the resident's temporarily occupied housing must be decent, safe, and sanitary and the resident must be reimbursed for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation. These expenses include, but are not limited to, moving expenses, increased housing costs (e.g., rent and utilities), meals if the temporary housing lacks cooking facilities (e.g., during a short hotel stay, whether or not on an emergency basis) and other applicable expenses.⁷⁸

C) Temporary relocation initially expected to last one year or less, but which extends beyond one year

In the event that a resident has been temporarily relocated, to a unit not in the same building or complex of buildings, for a period which was anticipated to last one year or less but the temporary relocation in fact exceeds one year, the resident qualifies as a "displaced person" under the URA and as a result immediately becomes eligible for all permanent relocation assistance and payments as a "displaced person" under the URA, including notice pursuant to Section 6.6(E). This assistance would be in addition to any assistance the person has already received for temporary relocation, and may not be reduced by the amount of any temporary relocation assistance.

In such event, the PHA or Project Owner shall offer the resident the opportunity to choose to voluntarily permanently relocate with the offered URA assistance or to choose to remain temporarily relocated based on updated information from the PHA or Project Owner about when they can return to the completed RAD unit. The PHA or Project Owner must present this opportunity to the resident when the temporary relocation extends beyond one year and each time thereafter that the temporary relocation extends beyond the previously anticipated duration. In presenting such opportunity, the PHA or Project Owner must inform the resident in writing that his or her acceptance of voluntary permanent relocation, with the associated assistance, would terminate the resident's right to return to the Covered Project. The PHA or Project Owner must provide the resident with at least 30 days to decide whether to remain in temporary relocation status or to voluntarily relocate permanently.

D) Temporary relocation anticipated to last more than one year

When the PHA anticipates that the temporary relocation, to a unit not in the same building or complex of buildings, will last more than one year, but the resident is retaining the resident's right to return to the Covered Project, the resident is considered temporarily relocated under RAD and is eligible to receive applicable temporary relocation assistance and payments. Under the URA, the resident becomes eligible to receive applicable relocation assistance and payments as a "displaced person" when the temporary relocation period exceeds one year and each time thereafter that the temporary relocation extends beyond the previously anticipated duration, at

⁷⁸ HUD Handbook 1378, Chapter 2, Section 2-7 governs activities subject to URA requirements and informs, but is not binding upon, any RAD activities not governed by the URA. PHAs may also refer to HUD Form 40030.

which time the PHA or Project Owner shall offer the resident the opportunity to choose to voluntarily permanently relocate or to remain temporarily relocated, as described in Section 6.4(C), above.

In order to allow residents to make the election earlier than required under the URA (thereby avoiding a year in temporary relocation housing prior to electing voluntary permanent relocation), if the PHA or Project Owner anticipates that temporary relocation will last more than one year, the PHA or Project Owner shall provide the resident with an initial option to (a) be temporarily relocated, retain the right to return to the Covered Project when a unit becomes available and receive assistance, including temporary housing and reimbursement for all reasonable out-of-pocket expenses associated with the temporary relocation, or (b) accept RAD voluntary permanent relocation assistance and payments equivalent to what a “displaced person” would receive under the URA. The PHA or Project Owner must inform the resident in writing that his or her acceptance of voluntary permanent relocation, with the associated assistance, would terminate the resident’s right to return to the Covered Project. The PHA or Project Owner must provide the resident with at least 30 days to decide whether to remain in temporary relocation status or to voluntarily relocate permanently.

E) Permanent moves in connection with a transfer of assistance

In cases solely involving a transfer of assistance to a new site, resident relocation from the Converting Project to the Covered Project is not, by itself, generally considered involuntary permanent relocation under RAD. However, the URA and/or Section 104(d) is likely to apply in most cases. In cases of a transfer of assistance to a new site where it has also been determined that the URA and/or Section 104(d) apply to the transfer of assistance, residents may be eligible for all permanent relocation assistance and payments for eligible displaced persons under the URA and/or Section 104(d). If the URA applies to a move of this type, the PHA or Project Owner must make available at least one, and when possible, three or more comparable replacement dwellings pursuant to 49 C.F.R. § 24.204(a). However, provided the transfer of assistance unit meets the URA definition of a comparable replacement dwelling pursuant to 49 C.F.R. § 24.2(a)(6), that unit could in fact represent the most comparable replacement dwelling as determined by the agency for purposes of calculating a replacement housing payment, if any, under 49 C.F.R. § 24.402.

Whether or not the URA and/or Section 104(d) apply, under RAD the residents are entitled to relocation assistance and payments, including counseling in preparation for the relocation, written notices of the relocation (including a 90-day RAD Notice of Relocation), and reimbursement for all reasonable out-of-pocket expenses, including moving expenses, incurred in connection with the move. It should be noted that the RAD relocation assistance and payments provided to transferring residents in this paragraph differ from those required under the URA and/or Section 104(d) as described above. Where both frameworks apply, the residents must receive the more extensive protections offered under either framework.

If HUD determines that the distance from the Converting Project to the site of the Covered Project is significant and the resident could not reasonably be required to move to the new site, then HUD will require the PHA to adjust project plans to accommodate the resident in an assisted unit (e.g., a public housing unit, some other project-based Section 8 unit or a market unit

with a housing choice voucher) within a reasonable distance of the site of the Converting Project. HUD will evaluate whether this requirement applies on a case by case basis, considering whether the distance would impose a significant burden on residents' access to existing employment, transportation options, schooling or other critical services. Accommodating the resident may also be satisfied by the resident's consent to an alternative housing option pursuant to Section 6.10. The requirement set forth in this paragraph is in addition to all protections, including, for example, the offer of comparable replacement dwellings, which are required in all instances where a transfer of assistance is subject to the URA and/or Section 104(d).

F) Voluntary permanent relocation

A resident may elect to relinquish their right of return and consent to voluntary permanent relocation pursuant to an alternative housing option offered and accepted according to the procedures described in Section 6.10, which Section specifies protections to ensure the resident's decision is fully informed. By selecting voluntary permanent relocation, the resident is electing to receive RAD permanent relocation assistance and payments which are equivalent to the relocation payments and assistance required to be provided to a "displaced person" pursuant to the regulations implementing the URA.

6.5. Initiation of Negotiations (ION) Date

Eligibility for URA relocation assistance is effective on the date of initiation of negotiations (ION) (49 C.F.R. § 24.2(a)(15)). For Converting Projects, the ION date is the effective date of the RCC. The ION date is also typically the date when PHAs can begin to issue RAD Notices of Relocation (except in the case of acquisitions when the PHA can issue a Notice of Intent to Acquire and RAD Notices of Relocation prior to the ION date). Any person who is in lawful occupancy on the ION date is presumed to be entitled to relocation payments and other assistance.

PHAs and Project Owners should note that prior to the ION date, a resident may be eligible as a displaced person for permanent relocation assistance and payments under the URA if HUD determines, after analyzing the facts, that the resident's move was a direct result of the project. However, resident moves taken contrary to specific instructions from the PHA or Project Owner (for example, contrary to instructions not to move if contained in a General Information Notice) are generally not eligible as a displaced person under the URA.

6.6. Resident Relocation Notification (Notices)

PHAs and Project Owners are encouraged to communicate regularly with the residents regarding project plans and, if applicable, the resulting plans for relocation. When residents may be relocated for any time period (including, without limitation, a move in connection with a transfer of assistance), written notice must be provided to the resident heads of households, including the notices listed below as applicable.⁷⁹ PHAs and Project Owners are also encouraged to provide

⁷⁹ The notices required under Sections 6.6(B) through 6.6(E) must be delivered in accordance with URA resident notification requirements, including the requirement that the notice be personally served or delivered by certified or registered first class mail return receipt requested. All notices must be delivered to each household (i.e., posting in

additional relocation notices and updates for the residents' benefit as appropriate for the specific situation.

To ensure that all residents understand their rights and responsibilities and the assistance available to them, consistent with URA requirements at 49 C.F.R. § 24.5 and civil rights requirements, PHAs and Project Owners must ensure effective communication with individuals with disabilities, including through the provision of appropriate auxiliary aids and services, such as interpreters and alternative format materials. Similarly, PHAs and Project Owners are required to take reasonable steps to ensure meaningful access for LEP persons in written and oral materials. Each notice shall indicate the name and telephone number of a person to contact with questions or for other needed help and shall include the number for the telecommunication device for the deaf (TDD) or other appropriate communication device, if applicable, pursuant to 24 C.F.R. §8.6(a)(2).

The purpose of these notifications is to ensure that residents are informed of their potential rights and, if they are to be relocated, of the relocation assistance available to them. Two initial notices launch this effort and provide critical information regarding residents' rights. The first, the RAD Information Notice, is to be provided at the very beginning of the RAD conversion planning process in order to ensure residents understand their rights, to provide basic program information and to facilitate residents' engagement with the PHA regarding project plans. The GIN, meanwhile, provides information specifically related to protections the URA provides to impacted residents. Subsequent notices provide more detailed information regarding relocation activities specific to the household, including tailored information regarding eligibility and timelines for relocation.

PHAs should note that a resident move undertaken as a direct result of the project may be eligible to receive relocation assistance and payments under the URA even though the PHA has not yet issued notices to them. Sample notices which may be used as-is or modified to fit the peculiarities of each situation are provided on the RAD website at www.hud.gov/rad.

A) *RAD Information Notice*

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

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

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

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

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

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

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

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

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

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

For conversions involving acquisition, the Project Owner (the "acquiring agency") may provide to residents of the Converting Project a Notice of Intent to Acquire (NOIA).⁸⁰ The NOIA may be provided no earlier than 90 days prior to the PHA's reasonable estimate of the date of submission of a complete Financing Plan. While eligibility for URA relocation assistance is generally effective on the effective date of the RCC (the ION date), a prior issuance of a NOIA establishes a resident's eligibility for relocation assistance and payments on the date of issuance of the NOIA and prior to the ION date.

D) RAD Notice of Relocation

If a resident will be relocated to facilitate the RAD conversion, the PHA shall provide written notice of such relocation by means of a RAD Notice of Relocation. The RAD Notice of

⁸⁰ Acquisition includes a new ownership entity's purchase of the Covered Project from the PHA, such as a purchase by a single purpose entity, an affiliate or a low-income housing tax credit ownership entity.

Relocation may not be issued until: 1) the effective date of the RCC (the ION date) if the conversion does not involve acquisition; or 2) the earlier of the issuance of the Notice of Intent to Acquire (see Section 6.6(C)) or the effective date of the RCC (the ION date) if the conversion involves acquisition. Prior to issuance of the RAD Notice of Relocation, PHAs and Project Owners should meet with each resident household to provide preliminary relocation advisory services and to determine their needs and preferences.⁸¹

A RAD Notice of Relocation is not required for residents who will not be relocated. As a best practice, PHAs or Project Owners should notify residents that they are not being relocated once that determination has been made if they were previously informed by the GIN and/or by other methods that relocation was a possibility.⁸²

A RAD Notice of Relocation shall provide either: 1) 30-days' notice to residents who will be relocated for twelve months or less; or 2) 90-days' notice to residents who will be relocated for more than twelve months.⁸³ The RAD Notice of Relocation must conform to the following requirements:

- (1) The notice must state the anticipated duration of the resident's relocation.
- (2) The notice must specify which entity (the PHA or the Project Owner) is primarily responsible for management of the resident's relocation and for compliance with the relocation obligations during different periods of time (i.e., before vs. after Closing).
- (3) For residents who will be relocated for twelve months or less:
 - The PHA or Project Owner must provide this notice a minimum of 30 days prior to relocation.⁸⁴ PHAs or Project Owners may deem it appropriate to provide longer notice periods for persons who will be temporarily relocated

⁸¹ PHAs and Project Owners should note the URA relocation advisory services requirement for personal interviews. *See* Section 6.7 of this Notice. In sequencing the RAD Notice of Relocation, PHAs and Project Owners wishing to offer alternative housing options pursuant to Section 6.10 should also note the additional complexity in the timeline of notices. Pursuant to Section 6.10(D), the resident can consent to an alternative housing option only after issuance of the NOIA or the effective date of the RCC and 30 days after presentation of the alternative housing options. In some cases, for example, when the resident would not otherwise be relocated for over twelve months, the RAD Notice of Relocation must include both the information described in Section 6.6(D)(3) and the information in Section 6.6(D)(4). The PHA or Project Owner should consider discussing the alternative housing options prior to issuing the RAD Notice of Relocation so that the RAD Notice of Relocation can be tailored to the resident's situation.

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

⁸³ The 90-day notice is required for residents relocated for more than twelve months, whether or not they intend to return to the Covered Project and whether or not they are eligible for assistance and payments as a displaced person under URA. Recipients of the 90-day notice would include those residents who have voluntarily accepted a permanent relocation option as well as those residents who are relocated within the same building or complex of buildings.

⁸⁴ Note that residents may elect to move to the relocation housing before the 30 days have elapsed. However, a PHA may not require a resident to move prior to this time.

for an extended period of time (over 6 months), or if necessary due to personal needs or circumstances.

- The notice must explain that the PHA or Project Owner will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with any temporary move (including, but not limited to, increased housing costs and moving costs).
- The notice must explain the reasonable terms and conditions under which the resident may exercise the right to return to lease and occupy a unit in the Covered Project.

(4) For residents who will be relocated for more than twelve months, including for residents who may wish to voluntarily accept a permanent relocation option:

- The PHA or Project Owner must provide this notice a minimum of 90 days prior to relocation of residents.⁸⁵
- The notice must offer the choice to be temporarily relocated, thereby preserving the resident's right to return, or the choice to be voluntarily permanently relocated pursuant to the procedures set forth in Section 6.10, together with guidance that the resident has at least thirty (30) days to consider the choice.
- For residents who voluntarily elect to be permanently relocated, the 90-day notice period may only begin once the PHA or Project Owner has made available at least one comparable replacement dwelling consistent with 49 C.F.R. § 24.204(a).⁸⁶
- The notice must describe the available relocation assistance, the estimated amount of assistance based on the individual circumstances and needs, and the procedures for obtaining the assistance. The notice must be specific to the resident and his or her situation so that the resident will have a clear understanding of the type and amount of payments and/or other assistance the resident household may be entitled to claim.
- The notice must comply with all requirements for a URA Notice of Relocation Eligibility as described in 49 C.F.R. § 24.203(b).

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

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

⁸⁵ Note that residents may elect to move to the relocation housing before the 90 days have elapsed. However, a PHA may not compel a resident to move prior to this time.

⁸⁶ PHAs should note that URA regulations also require, where possible, that three or more comparable replacement dwellings be made available before a resident is required to move from his or her unit.

E) URA Notice of Relocation Eligibility – for residents whose temporary relocation exceeds one year (49 C.F.R. § 24.203(b))

After a resident has been temporarily relocated for one year, notwithstanding a prior issuance of a RAD Notice of Relocation, the PHA or Project Owner must provide an additional notice: the notice of relocation eligibility in accordance with URA requirements (“URA Notice of Relocation Eligibility”). The URA Notice of Relocation Eligibility is not required if the resident has already accepted permanent relocation assistance.⁸⁷

The URA Notice of Relocation Eligibility must conform to URA requirements as set forth in 49 C.F.R. part 24 and shall:

- Provide current information as to when it is anticipated that the resident will be able to return to the Covered Project.
- Give the resident the choice to remain temporarily relocated based upon the updated information or to accept permanent URA relocation assistance at that time instead of exercising the right to return at a later time.

If the resident chooses to accept permanent URA relocation assistance and this choice requires the resident to move out of their temporary relocation housing, the URA requires that the PHA or Project Owner make available at least one, and when possible, three or more comparable replacement dwellings pursuant to 49 C.F.R. § 24.204(a), which comparability analysis is in reference to the resident’s original unit. The URA further requires that the resident receive 90 days’ advance written notice of the earliest date they will be required to move pursuant to 49 C.F.R. § 24.203(c).

⁸⁷ To illustrate, consider the following examples.

- Example 1: The household is expected to be relocated for 11 months. The resident would receive a RAD Notice of Relocation offering only temporary relocation. Construction delays result in the extension of the relocation such that, in fact, it exceeds 12 months. When the temporary relocation exceeds 12 months, the resident must receive a URA Notice of Relocation Eligibility offering a choice between continuation in temporary relocation status and permanent relocation.
- Example 2: The household is expected to be relocated for 14 months. The resident would receive a RAD Notice of Relocation offering a choice between temporary relocation status and permanent relocation. If the household elects temporary relocation, the URA Notice of Relocation Eligibility is required as an additional notice following twelve months in temporary relocation status.
- Example 3: The household is expected to be relocated for 14 months. The resident would receive a RAD Notice of Relocation offering a choice between temporary relocation status and permanent relocation. If the household elects permanent relocation, the URA Notice of Relocation Eligibility is not required.
- Example 4: The household can be accommodated with temporary relocation of 3 months, but has been offered and seeks to accept permanent relocation pursuant to an alternative housing option. This resident would receive a RAD Notice of Relocation under Section 6.6(D)(4) offering a choice between temporary relocation status (the default option) and permanent relocation (the alternative housing option), instead of the RAD Notice of Relocation under Section 6.6(D)(3) which would be expected absent a permanent relocation option. The URA Notice of Relocation Eligibility is not required in either case because a temporary relocation exceeding 12 months was never anticipated nor experienced.

F) Notification of Return to the Covered Project

With respect to all temporary relocations, the PHA or Project Owner must notify the resident in writing reasonably in advance of the resident's expected return to the Covered Project, informing the resident of:

- The entity (the PHA or the Project Owner) with primary responsibility for managing the resident's relocation;
- The address of the resident's assigned unit in the Covered Project and, if different from the resident's original unit, information regarding the size and amenities of the unit;
- The date of the resident's return to the Covered Project or, if the precise date is not available, a reasonable estimate of the date which shall be supplemented with reasonable additional notice providing the precise date;
- That the PHA or Project Owner will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with the return relocation; and
- The resident's options and the implications of those options if the resident determines that he or she does not want to return to the Covered Project and wants to decline the right of return.⁸⁸

Reasonable advance notice shall be 15% of the duration of the resident's temporary relocation or 90 days, whichever is less. For short-term relocations, the PHA or Project Owner may include this information within the RAD Notice of Relocation.

6.7. Relocation Advisory Services

Throughout the relocation planning process, the PHA and Project Owner should be in communication with the residents regarding the evolving plans for relocation. Notwithstanding this best practice, certain relocation advisory services, described below, are required by the URA.

The URA regulations require the PHA or Project Owner to carry out a relocation assistance advisory program that includes specific services determined to be appropriate to residential or nonresidential displacements. The specific advisory services to be provided, as determined to be appropriate, are outlined at 49 C.F.R. § 24.205(c). For residential displacement under the URA, a personal interview is required for each displaced resident household to determine the relocation needs and preferences of each resident to be displaced. The resident household shall be provided an explanation of the relocation payments and other assistance for which the resident may be eligible, the related eligibility requirements, and the procedures for obtaining such assistance. Advisory counseling must also inform residents of their fair housing rights and be carried out in

⁸⁸ If the resident declines to return to the Covered Project upon completion of the period of temporary relocation, the resident shall be considered to have voluntarily moved out of the property, without the benefit of further relocation assistance. For example, a PHA or Project Owner may have rented a market-rate apartment as a temporary relocation resource for a six-month period. In such a situation, the resident may decline to return to the Covered Project and choose to remain in the market-rate apartment at the expiration of the six-month period, but shall not be eligible for any further relocation assistance and payments (including rent differential payments) under this Notice, the URA or Section 104(d), if applicable, in connection with the resident's decision to remain in the temporary housing and not return to the Covered Project.

a manner that satisfies the requirements of Title VI of the Civil Rights Act of 1964, the Fair Housing Act, and Executive Order 11063 (49 C.F.R. § 24.205(c)(1)).⁸⁹ Such advisory services under the URA may include counseling to ensure that residents affected by the project understand their rights and responsibilities and the assistance available to them (49 C.F.R. § 24.205(c)). In addition, the PHA or Project Owner should inform residents that if they believe they have experienced unlawful discrimination, they may contact HUD at 1-800-669-9777 (Voice) or 1-800-927-9275 (TDD) or at <http://www.hud.gov>.

6.8. Initiation of Relocation

PHAs and Project Owners **may not initiate any involuntary physical relocation until both the RCC is in effect and the applicable RAD Notice of Relocation period has expired** (i.e., after either 30 or 90 days' notice as applicable depending on nature of the relocation, as described above). This prohibition applies to all types of RAD transactions, regardless of whether the RAD Notice of Relocation is provided after issuance of a NOIA (for conversions involving acquisition) or following the effective date of the RCC (for all other conversions). PHAs are advised to account for the required 30-day or 90-day written notice periods in their planning process, to ensure that notices which satisfy all applicable requirements are issued prior to taking any action to initiate relocation.

Neither involuntary nor voluntary relocation for the project shall take place prior to the effective date of the RCC, unless moves are authorized under Section 7, below (“Applicability of HCV and Public Housing Requirements”) or unless HUD provides explicit approval which will only be provided in extraordinary circumstances. The PHA must wait until the RAD Notice of Relocation period has expired before it may initiate any involuntary relocation. However, a resident may request to move voluntarily, and the PHA may honor a resident’s request to move, before the applicable 30-day or 90-day period has elapsed, provided that the PHA may not take any action to encourage or coerce a resident to make such a request. If a resident has elected an alternative housing option, PHAs are advised to ensure that any consent to voluntary permanent relocation does not expire prior to the date of the relocation, as described in Section 6.10.

HUD may use administrative data to identify and investigate projects where relocation may be occurring prior to RCC.

6.9. Records and Documentation; Resident Log

HUD may request from the PHA or Project Owner written records and documentation in order to evidence the PHA’s and/or Project Owner’s compliance, as applicable, with this Notice and the URA.⁹⁰ HUD may request to review some or all of such records in the event of compliance

⁸⁹ For example, under fair housing and civil rights laws, the PHA and Project Owner may be required to inform residents about and provide reasonable accommodations for individuals with disabilities, such as search assistance; take appropriate steps to ensure effective communication with individuals with disabilities, such as through the provision of auxiliary aids and services, such as interpreters and alternate format documents; provide advisory counseling services in accessible locations and in an accessible manner for individuals with disabilities; and take reasonable steps to ensure meaningful access for LEP persons. See Section 4 of this Notice for more information on these requirements.

⁹⁰ Chapter 6 of HUD Handbook 1378 includes guidance on URA recordkeeping requirements.

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

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

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

- Date of the GIN
- Date of the CHAP
- Date of NOIA
- Date of RAD Notice of Relocation
- Date of URA Notice of Relocation Eligibility
- Date of most recent consent to voluntary permanent relocation⁹¹
- Date of relocation away from the Converting Project or Covered Project
- Dates of any intermediate relocation moves
- Date of return to the Covered Project or to the household's post-closing permanent address.⁹²
- The following information for each resident household, as applicable:
 - The type of move (e.g., the types identified in Section 6.4, above)
 - The form of any temporary relocation housing (e.g., hotel, assisted housing, market-rate housing)
 - The address and unit size of any temporary relocation housing
 - Whether alternative housing options were offered consistent with Section 6.10, below
 - Any material terms of any selected alternative housing options
 - The type and amount of any payments for
 - Moving expenses to residents and to third parties
 - Residents' out-of-pocket expenses
 - Rent differential payments or other payments for temporary or permanent rental assistance, together with the rent and utilities (if applicable) that were the basis for the calculations
 - Any other relocation-related compensation or assistance

6.10. Alternative Housing Options

Under the RAD Notice, “involuntary permanent relocation” is prohibited and each resident must be able to exercise his or her right of return to the Covered Project. A PHA or Project Owner is permitted to offer a resident alternative housing options when a resident is considering his or her future housing plans, provided that at all times prior to the resident's decision, the PHA and Project Owner preserve the resident's ability to exercise his or her right of return to the Covered Project.

A) Requirements for Any Offer of Alternative Housing Options

All residents who are similarly situated must be given the same offer of alternative housing options. If the PHA or Project Owner seeks to limit the number of households that accept the

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

⁹² In the case of voluntary permanent relocation, the date of “return” may be the same as the date of relocation away from the Converting Project.

offer of alternative housing options, the PHA or Project Owner shall determine a fair and reasonable method for selection among similarly situated residents.⁹³

In connection with any offer and acceptance of alternative housing options, the PHA or Project Owner must ensure that the residents' decisions are: 1) fully informed; 2) voluntary; and 3) carefully documented. Any alternative housing option must include, at a minimum, all relocation assistance and payments required under this Notice, the URA and Section 104(d), as applicable, and may include other elements. Funds administered by HUD may not be used to pay any monetary elements not required under this Notice, the URA or Section 104(d).

Acceptance of an alternative housing option is considered voluntary permanent relocation and the accompanying RAD relocation assistance and payments for which the resident may be eligible must be administered in accordance with all requirements for an eligible displaced person under the URA and its implementing regulations and, where applicable, Section 104(d) and its implementing regulations.

PHAs may not propose or request that a displaced person waive rights or entitlements to relocation assistance under the URA or Section 104(d). The PHA must provide a written notice of URA or Section 104(d) relocation assistance and payments for which the resident may be eligible so that the resident may make an informed housing choice. The resident must be provided at least thirty (30) days to consider the offer of voluntary permanent relocation and the resident's acceptance of the PHA's offer of voluntary permanent relocation must be in writing signed by the head of the household for that unit.

B) Assisted Housing Options as Alternatives

Alternative housing option packages may include a variety of housing options and PHAs and Project Owners shall take particular care to ensure program compliance with the regulations applicable to the alternative housing options. Examples of alternative housing options may include:

- Transfers to public housing
- Admission to other affordable housing properties subject to the program rules applicable to such properties
- Housing Choice Vouchers (HCVs) subject to standard HCV program administration requirements. PHAs must operate their HCV programs, including any HCVs offered as an alternative housing option, in accordance with their approved policies as documented in their Section 8 Administrative Plan and HUD regulations at 24 C.F.R. part 982. Any offer of an HCV as an alternative housing option must be made consistent with the

⁹³ For example, if the RAD conversion is financed by LIHTC and a few residents would not meet LIHTC program requirements, the PHA and Project Owner may want to offer these household alternative voluntary permanent relocation options. However, they must offer the same alternative housing options to all such households. As a second example, if the PHA and Project Owner seek to create two on-site vacancies of a particular unit size in order to facilitate temporary relocation on-site, the PHA may offer an alternative housing option of a housing choice voucher to all residents of applicably sized units (assuming that to do so is consistent with the PHA's voucher administration policies), and conduct a lottery to select the two households which will receive the vouchers.

PHA's admission preferences and other applicable policies and procedures set forth in the Section 8 Administrative Plan.

- Homeownership programs subject to the applicable program rules
- Other options as may be identified by the PHA and/or Project Owner

C) Monetary Elements Associated With Alternative Housing Options

A PHA or a Project Owner may include a monetary element in an alternative housing option package, provided that:

- Any monetary element associated with the alternative housing option shall be completely distinct from and in addition to any required RAD, URA or Section 104(d) relocation payments and benefits for which the resident is eligible ("Required Relocation Payments").
- No funds administered by HUD may be used to pay for any monetary element associated with the alternative housing option other than Required Relocation Payments.
- Any monetary element associated with the alternative housing option other than Required Relocation Payments must be the same amount offered to all similarly situated households.⁹⁴
- Any alternative housing option package must comply fully with the disclosure and agreement provisions of this Notice.

D) Disclosure and Agreement to Alternative Housing Options

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

⁹⁴ Monetary payments other than Required Relocation Payments are considered "temporary, nonrecurring or sporadic income" pursuant to 24 C.F.R. § 5.609(c)(9) and consequently are excluded from income for purposes of eligibility and assistance calculations under certain HUD programs. Residents should be reminded that monetary payments other than URA relocation payments may be taxable under the Internal Revenue Code, that monetary payments, including required relocation payments, may affect residents' eligibility for other assistance programs and that the resident should seek knowledgeable guidance on these matters, including guidance on the taxation of monetary payments under state law.

⁹⁵ In the case of a transfer of assistance to a new site a significant distance from the Converting Project as described in Section 6.4(E), the resident shall be informed of the resident's right to return to the Covered Project at the new site and of the resident's right to an assisted unit within a reasonable distance of the site of the Converting Project, as described in Section 6.4(E).

The written notification may request written consent from the resident to exercise the alternative housing option and receive permanent relocation assistance and payments pursuant to RAD, the URA and/or Section 104(d), as applicable, in addition to any benefits associated with the alternative housing option. As part of any voluntary consent, the resident head of household must acknowledge in writing that acceptance of such assistance terminates the resident's right to return to the Covered Project. In order to ensure that the resident has sufficient time to seek advice and consider the alternative housing options, any consent to an alternative housing option executed within 30 days of the written presentation of the options shall be invalid.

Any offer of alternative housing options must be made in writing and the acceptance of the alternative must be voluntary and in writing. The offer of an alternative housing option must contain the following elements:

- The resident is informed of his or her right to return to the Covered Project and that neither the PHA nor the Project Owner can compel the resident to relinquish his or her right to return. The offer of alternative housing options must clearly state that acceptance of any alternative would relinquish the resident's right to return to the Covered Project.
- The offer of an alternative housing option must be accompanied by identification of comparable housing units which the resident may use to understand the nature of housing options available to them and the rent and estimated utility costs associated with such housing options. This information must also be accompanied by a reasonable estimate of any replacement housing payment or "gap payment" for which the resident may be eligible.
- The offer of an alternative housing option must be accompanied by information regarding moving payments and assistance that would be available if the resident exercises the right of return and if the resident accepts the alternative housing option.
- Residents must be offered advisory assistance to consider their options.
- To be fully informed, the offer must outline the implications and benefits of each alternative housing option being made available (i.e., of accepting each alternative housing option as compared to exercising his or her right to return) as well as a reasonable estimate of when the resident's relocation might occur. Implications and benefits include payment amounts, differences in rent calculations, differences in program rules, housing location, and potential long-term implications such as household housing expenses multiple years in the future.
- To be fully voluntary, the resident must have at least thirty (30) days following delivery of the written offer to consider their options. LEP persons must be provided a written translation of the offer and oral interpretation of any meetings or counseling in the appropriate language. In addition, PHAs must comply with their obligation to ensure effective communication with persons with disabilities.
- The resident cannot be asked to make a decision which will be implemented at a distant future time. Consequently, the resident may not provide written consent to an alternative housing option (and consequently, consent to voluntary permanent relocation) until after

the earlier of issuance of the NOIA or the effective date of the RCC.⁹⁶ If a resident signs a written consent to accept an alternative housing option, that written consent is valid for 180 days. If relocation (after the applicable notice periods) has not occurred within this 180 day period, then the PHA or Project Owner must secure a new consent to accept an alternative housing option. New relocation notices are generally not required.

- The acceptance must be in writing signed by the resident head of household, including a certification of facts to document that the household is relinquishing its right to return and that the decision and the acceptance of the alternative housing option was fully informed and voluntary.
- Residents accepting alternative housing options to relinquish their right to return will be considered to have voluntarily and permanently relocated. Such residents are to be provided applicable RAD, URA and/or Section 104(d) relocation assistance and payments.

The information included with the offer of alternative housing options is to aid the resident in making decisions regarding the desirability of the alternative housing options and neither satisfies nor replaces the relocation notices and information required to be provided to residents pursuant to this Notice, the URA or Section 104(d).

While HUD does not require PHAs to submit documentation of alternative housing options offered to residents or the residents' elections, PHAs must keep auditable written records of such consultation and decisions. HUD may request this documentation at any time, including as part of a review of the Checklist or if relocation concerns arise.

6.11. Lump Sum Payments

PHAs and Project Owners should note that certain relocation payments to displaced residential tenants may be subject to 42 USC § 3537c ("Prohibition of Lump-Sum Payments") and must be disbursed in installments. The PHA or Project Owner may determine the frequency of the disbursements which must be made in installments. Handbook 1378, Chapter 3-7(D) provides guidance on the manner and frequency of disbursing payments subject to this requirement.

Any monetary element beyond Required Relocation Payments which may be associated with an alternative housing option described in Section 6.10, above, is not relocation assistance and is therefore not subject to the requirements regarding lump sum payments.

SECTION 7. APPLICABILITY OF HCV AND PUBLIC HOUSING REQUIREMENTS

7.1. HCV Waiting List Administration Unrelated to the RAD Transaction

From time to time, a resident of a Converting Project may place themselves on the PHA's waiting list for HCVs independent of any planned RAD transaction. With respect to residents of a Converting Project prior to the effective date of the HAP contract, PHAs should continue to

⁹⁶ The PHA and Project Owner should note that securing resident consent to an alternative housing option may delay the issuance of the RAD Notice of Relocation. The RAD Notice of Relocation must be specific to whether the resident will be temporarily or permanently relocated.

administer their HCV waiting list in accordance with their Section 8 Administrative Plans. Residents who rise to the top of the HCV waiting list independent of any preference for relocating RAD residents or other RAD provisions and accept an HCV are not considered to be relocated as a result of the RAD conversion. Standard administration of the PHA's HCV waiting list is not considered relocation.

7.2. HCV Waiting List Administration Related to the RAD Transaction

From time to time, a PHA may wish to use HCV resources as a relocation option in connection with a RAD transaction. In order to do so, a PHA must modify its Section 8 Administrative Plan to provide a preference for relocating RAD residents and the PHA is subject to Section 6.8 of this Notice relating to initiation of relocation. Further, if a PHA provides a preference for relocating RAD residents, the PHA must be explicit regarding the nature of the HCV as a relocation resource. If the PHA anticipates using the HCV as a temporary relocation resource, the PHA must recognize that it cannot rescind an HCV once issued to the resident (i.e., the family would have to voluntarily relinquish their voucher and may choose to remain in the HCV program indefinitely). The PHA must also provide a preference for admission to the Covered Project in order to satisfy the right to return. Alternatively, if the PHA anticipates using the HCV as a voluntary permanent relocation resources, the PHA must comply with the alternative housing options provisions of Section 6.10.⁹⁷

7.3. Public Housing Transfers Unrelated to the RAD Transaction

From time to time, a resident of a Converting Project may request a transfer to another public housing property independent of any planned RAD transaction. With respect to residents of a Converting Project prior to the effective date of the HAP contract, PHAs must continue to administer their admissions and occupancy procedures as adopted. Any prohibitions in this Notice on implementing relocation do not apply to residents requesting public housing transfers, moves pursuant to the Violence Against Women Act (VAWA)⁹⁸ or reasonable accommodation moves. Standard administration of the PHA's admissions and occupancy policy is not considered relocation.⁹⁹ Transfers not undertaken for the RAD project are not subject to URA. However, it is recommended that the PHA document the transfer carefully, including an acknowledgement by the resident that the transfer is not undertaken for the RAD project, is not

⁹⁷ PHAs and Project Owners should note that while in most cases, there is no rent differential between the tenant paid rent in a public housing unit and in an HCV, there are some situations (such as flat rent households) where a difference does exist. Rental assistance payments under the URA are required if there is a difference between these two amounts.

⁹⁸ Title IV, section 40001-40703.

⁹⁹ Standard administration of the PHA's admissions and occupancy policy is permitted. However, HUD is sensitive to concerns that discussion of the planned RAD conversion and construction activities may cause residents to perceive a pressure to transfer without the counseling and moving assistance which would be available were the household to wait until relocation. If relocation at the Converting Project is planned, PHAs are strongly advised to document any such transfers carefully and to provide any households moving under standard admissions and occupancy policies with additional notices referencing the assistance and payments which would be available if the household were to remain in place until the relocation plan is implemented.

subject to URA requirements and that the resident is moving notwithstanding the guidance in the GIN or other relocation guidance from the PHA.

7.4. Resident Initiated Public Housing Transfers Related to the RAD Transaction

Pursuant to Section 1.8 of the RAD Notice, households in the Converting Project who do not want to transition to the Section 8 program may be offered, if available, the opportunity to move to other public housing owned by the PHA. Such move shall be implemented as a transfer and shall be prioritized equivalent to a “demolition, disposition, revitalization or rehabilitation transfer” as described in Section 11.2 of the applicable Public Housing Occupancy Guidebook. Transfers for this purpose do not require any modification to the PHA’s admissions and occupancy policy and may occur at any time pursuant to the PHA’s admissions and occupancy policy. Transfers for this purpose, while initiated by the resident, are the result of the PHA-initiated RAD transaction and the PHA must bear the reasonable costs of transfer. The reasonable cost of the transfer includes not just the cost of packing, moving, and unloading, but also the cost of disconnecting and reconnecting any existing resident-paid services such as telephone and cable television. The PHA must also document that the resident’s transfer request is fully informed and fully voluntary, which documentation must include an acknowledgement by the resident that the transfer is not undertaken at the request of the PHA or under pressure from the PHA, that the resident is moving notwithstanding the guidance in the GIN or other relocation guidance from the PHA and that the resident is withdrawing from participation in the RAD program and consequently losing rights, including the right to return, which accrue to residents participating in the RAD program. A public housing resident who voluntarily seeks a public housing transfer is generally not considered to be displaced under the URA or Section 104(d), where applicable.

7.5. Public Housing as a Temporary Relocation Resource

PHAs and Project Owners may wish to mitigate the relocation budget associated with the RAD conversion by using units within the PHA’s portfolio as relocation resources. In light of its mission to serve as many low-income households as possible, including its need to accommodate emergency transfers (such as moves pursuant to VAWA), the PHA should minimize the use of the public housing units not converting under RAD for temporary relocation of RAD impacted residents. HUD has a strong preference that the PHA use the units within the PHA’s Converting Projects as a temporary relocation resource prior to using units in the remainder of the PHA’s public housing portfolio. PHAs may elect not to lease units within the Converting Projects or, if necessary, the remainder of its portfolio, for this purpose only to the extent reasonably necessary to facilitate construction or rehabilitation.

Upon the effective date of the HAP contract (usually also the effective date of the RAD conversion), each resident of a Covered Project becomes a participant in the Section 8 program and is no longer part of the public housing program. A PHA may use public housing as a temporary relocation resource if approved by HUD, which approval shall depend on the proposed structure. PHAs wishing to use public housing units as a temporary relocation resource must consult with HUD’s Office of Public and Indian Housing (PIH) prior to the formal request for HUD approval. It is unlikely that HUD would approve a request to use public housing units

as a relocation resource for a period exceeding one year after the effective date of the HAP contract.

If HUD grants approval, HUD shall provide alternative requirements regarding PIH Information Center (PIC) documentation of the occupancy of these temporary relocation resources. PHAs must follow any guidance or instructions regarding treatment of the public housing units in HUD's data systems as may be provided from time to time.

PHAs and Project Owners should note that, absent written approval, if a resident seeks to occupy a public housing unit after the effective date of the HAP contract, the resident would need to be readmitted to public housing in a manner consistent with the waitlist and admissions policies and must exit the Section 8 program.

7.6. Terminations (Including Evictions) and End of Participation Unrelated to the RAD Transaction

Public housing program requirements related to continued occupancy and termination, including rules on grievances and related hearings, remain in effect until the effective date of a new PBV or PBRA HAP contract. If a resident is evicted in accordance with applicable state and local law and the eviction is not undertaken for the purpose of evading the obligation to make available RAD relocation and URA payments and other assistance, the resident is generally not entitled to relocation assistance and payments under this Notice or the URA (49 C.F.R. § 24.206). If a resident voluntarily ends his or her participation in the public housing program, in the absence of evidence that the end of participation was induced by the PHA for the purpose of evading the obligation to make available RAD relocation and URA payments and other assistance, the resident is generally not entitled to relocation assistance and payments under this Notice or the URA.

7.7. Right-Sizing

Public housing, PBV and PBRA requirements mandate that, upon the availability of a unit which is appropriate for the household size, the PHA or Project Owner must transfer a household that is under- or over-housed into the unit appropriate to the household's size. However, accommodating all residents pursuant to the right of return has primacy over right-sizing requirements and may, in some cases, require temporarily over-housing households. In such circumstances, the PHA or Project Owner shall subsequently transfer the household to an appropriate size unit when available, as is required by the applicable program regulation. Such actions shall be governed by the applicable program regulation and shall not be considered relocation under this Notice.

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

Edward L. Golding
Principal Deputy Assistant Secretary for
Housing

APPENDIX I: Applicable Legal Authorities

APPENDIX II: Recommended Relocation Plan Contents

APPENDIX I: Applicable Legal Authorities

Part 1

This Appendix to the Notice identifies key legal authorities with respect to fair housing, civil rights, and resident relocation. This Appendix is not exhaustive of applicable legal authorities, which authorities may also include other Federal statutes, regulations and Executive Orders, and civil rights provisions related to other programs (including funding programs) associated with the RAD transaction.

Fair Housing Act (Title VIII of the Civil Rights Act of 1968, as amended)

The Fair Housing Act, 42 U.S.C. § 3601 et seq., and its implementing regulations, 24 C.F.R. part 100, prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, disability, or familial status. The Fair Housing Act applies to for-sale and rental housing, whether the housing is privately or publicly funded, including housing supported by tax credits. Single family homes, condominiums, apartment buildings, time-shares, dormitories, transitional housing, homeless shelters that are used as a residence, student housing, assisted living housing, and other types of housing are all covered by the Fair Housing Act.

Among its substantive provisions, the Fair Housing Act requires “covered multifamily dwellings,” designed and constructed for first occupancy after March 13, 1991, to be readily accessible to and usable by persons with disabilities. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas are subject to the Act’s design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas are subject to the Act’s design and construction requirements.¹⁰⁰ In addition, the Fair Housing Act requires that housing providers make reasonable accommodations in rules, policies, and services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit, including public and common use areas, and that housing providers permit reasonable modifications of existing premises for persons with disabilities.

The Fair Housing Act also requires HUD to administer HUD programs and activities in a manner that affirmatively furthers fair housing (42 U.S.C. § 3608(e)(5)). HUD’s affirmatively furthering fair housing (“AFFH”) rule in 24 C.F.R. §§ 5.150-5.180 will apply to PHAs (except for qualified PHAs) for the PHA’s fiscal year that begins on or after January 1, 2018 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5. The affirmatively furthering fair housing regulations will apply to qualified PHAs, for the PHA’s fiscal year that begins on or after January 1, 2019 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5.¹⁰¹

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

¹⁰¹ For purposes of the AFFH rule, “[a]ffirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing under the AFFH rule means taking meaningful actions that, taken together, address

Additional detail and discussion of the interplay between the Fair Housing Act, Section 504, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

United States Housing Act of 1937 (1937 Act)

The United States Housing Act of 1937 (1937 Act) (42 U.S.C. § 1437c-1(d)(15)) requires PHAs to submit a 5-year plan and an Annual Plan. Pursuant to HUD regulations, the Annual Plan includes a certification by the PHA that the PHA will affirmatively further fair housing.

Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*) and HUD's implementing regulation (24 C.F.R. part 1) prohibit recipients of Federal financial assistance from discriminating, excluding from participation, or denying benefits to, any person on the basis of race, color, or national origin. In addition, Title VI regulations prohibit HUD recipients of Federal financial assistance from utilizing criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin (24 C.F.R. § 1.4(b)(2)(i)). When determining the site or location of housing, recipients may not make selections with the purpose or effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination on the ground of race, color, or national origin (24 C.F.R. § 1.4(b)(3)). An applicant or recipient of HUD financial assistance also has an obligation to take reasonable action to remove or overcome the consequences of prior discriminatory practices regardless of whether the recipient engaged in discriminatory conduct (24 C.F.R. § 1.4(b)(6)).

Recipients of Federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities for persons who have limited ability to read, speak, or understand English – i.e., individuals who have limited English proficiency (LEP). This includes oral and written communications during relocation and throughout a RAD transaction. Such language assistance may include, but is not limited to, providing written translation of notices regarding the plans for the project and relocation and oral interpretation at meetings. Otherwise, LEP persons may be denied participation in, and the benefit of, the recipients' program or activity. On January 22, 2007, HUD issued "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (LEP Guidance), available at: http://www.lep.gov/guidance/HUD_guidance_Jan07.pdf.¹⁰²

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

¹⁰² See also Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, which requires recipients of Federal financial assistance to take reasonable steps to provide meaningful access to

Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 provides: “No otherwise qualified individual with a disability in the United States ... shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, service or activity receiving Federal financial assistance.”¹⁰³

Among other things, HUD’s regulations implementing Section 504 (in 24 C.F.R. part 8) prohibit recipients of Federal financial assistance, in determining the site or location of a facility receiving such assistance, from making site selections the purpose or effect of which would (1) exclude qualified individuals with disabilities from or deny them the benefits of a program or activity, or otherwise subject them to discrimination; or (2) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities.¹⁰⁴ These prohibitions apply to both determining the site of permanent facilities and a site for relocation of residents.

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

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

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

¹⁰³ 29 U.S.C. § 794. HUD’s Section 504 regulation that applies to recipients of Federal financial assistance, including PHAs and Project Owners, is located at 24 C.F.R. part 8.

¹⁰⁴ 24 C.F.R. § 8.4(b)(5).

providing interpreters and alternate format documents (e.g., Braille, large print, accessible electronic communications) for persons with disabilities.

Additional detail and discussion of the interplay between Section 504, the Fair Housing Act, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

Titles II and III of the Americans with Disabilities Act

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in all services, programs, and activities provided or made available by public entities. Title II of the ADA applies to housing developed or operated by state and local governments, which includes a PHA. Title III of the ADA prohibits discrimination on the basis of disability by public accommodations and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. For example, Title III applies to rental offices, sales offices, homeless shelters, hotels and motels, and commercial spaces associated with housing, such as daycare centers, social service offices, and sales and retail establishments. Titles II or III also will generally apply to community spaces and facilities, such as neighborhood networks, to computer centers (including the computers in the centers), and to transportation services and conveyances provided by PHAs and Project Owners.

Additional detail and discussion of the interplay between Titles II and III of the Americans with Disabilities Act, the Fair Housing Act, and Section 504 of the Rehabilitation Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

Section 109

Section 109 of the Housing and Community Development Act of 1974 (HCDA of 1974), Title I, prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex in Community Development Block Grant (CDBG) programs and activities. Section 109 applies to RAD projects that receive CDBG or other assistance under Title I of the HCDA of 1974.

In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 to ensure that individuals are not subjected to discrimination on the basis of race, color, national origin, disability, age, religion, or sex by recipients of CDBG funds. Section 109 charges HUD with enforcing the right of individuals to live in CDBG-funded housing and participate covered programs and activities free from such discrimination. However, this additional statutory authority only applies to programs authorized under Title I of the HCDA of 1974, such as CDBG and programs, such as Section 108 loan guarantees and the Historically Black Colleges and Universities program.

Equal Access to HUD-assisted or HUD-insured Housing

HUD requires its housing programs to be open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status. HUD recipients and subrecipients must comply with 24 C.F.R. § 5.105(a)(2) when determining eligibility for housing assisted with HUD

funds or subject to an FHA-insured mortgage, and when making such housing available. This includes making eligibility determinations and making housing available regardless of actual or perceived sexual orientation, gender identity, or marital status, and prohibiting inquiries about sexual orientation or gender identity for the purpose of making eligibility determinations or making housing available. Applicants are encouraged to become familiar with these requirements, HUD's definitions of sexual orientation and gender identity at 24 C.F.R. § 5.100, clarifications to HUD's definition of family at 24 C.F.R. § 5.403, and other regulatory changes made through HUD's Equal Access Rule, published in the Federal Register at 77 FR 5662 (Feb. 3, 2012).

Section 3: Economic Opportunities for Low- and Very Low-income Persons.

Certain HUD programs require recipients of assistance to comply with Section 3 of the Housing and Urban Development Act of 1968 (Section 3), 12 U.S.C. § 1701u (Economic Opportunities for Low- and Very Low-Income Persons in Connection with Assisted Projects), and the HUD regulations at 24 C.F.R. part 135. The regulations at 24 C.F.R. part 135 implementing Section 3 ensure, to the greatest extent feasible, that training, employment, contracting and other economic opportunities be directed to low- and very low-income persons, especially recipients of government assistance for housing, and to businesses that provide economic opportunities to low- and very low-income persons where proposed project is located. Recipients of funds covered by Section 3 must comply with 24 C.F.R. part 135, particularly subpart B-Economic Opportunities for Section 3 residents and Section 3 Business Concerns, and Subpart E-Reporting and Recordkeeping. HUD encourages recipients to search the national Section 3 Business Registry to find local businesses that prioritize hiring Section 3 residents.

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 USC § 4601 *et seq.* (URA) is a Federal law that establishes minimum standards for programs or projects receiving Federal financial assistance that include the acquisition of real property (real estate) and/or displace persons from their homes, businesses, or farms as a result of acquisition, rehabilitation, or demolition.¹⁰⁵ The URA implementing Federal regulations can be found at 49 C.F.R. part 24. Project-Based Voucher (PBV) and Project-Based Rental Assistance (PBRA) are considered Federal financial assistance for purposes of the URA. As a result, the URA will apply to acquisitions of real property and relocation of persons from real property that occur as a direct result of acquisition, rehabilitation or demolition for a project that involves conversion of assistance to PBV or PBRA programs under RAD.

¹⁰⁵ For additional guidance, see HUD Handbook 1378 Tenant Assistance, Relocation, and Real Property Acquisition), available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/library/relocation/policyandguidance/handbook1378.

Section 104(d) of the Housing and Community Development Act of 1974

Section 104(d) of the Housing and Community Development Act of 1974, as amended, 42 USC § 5304(d), (Section 104(d)), is a Federal law that applies when a lower-income dwelling is demolished or converted (as conversion is defined in accordance with 24 C.F.R. § 42.305) to a use other than lower-income housing in connection with a Community Development Block Grant Program (CDBG) or HOME Investment Partnerships Program (HOME) funded activity. Under Section 104(d), a lower-income person is considered displaced and, therefore eligible for Section 104(d) relocation assistance if the person permanently moves from real property or permanently moves personal property from real property as a direct result of the demolition or conversion of a lower-income dwelling to a use other than lower-income dwelling unit in connection with a CDBG or HOME funded activity. The Section 104(d) one-for-one replacement housing requirements may apply with respect to occupied and vacant occupiable lower-income dwelling units that are demolished or converted to a use other than lower-income dwelling units in connection with CDBG or HOME funded activity. Section 104(d) implementing regulations can be found at 24 C.F.R. part 42, Subpart C. Additional HUD policy and guidance for Section 104(d) is available in HUD Handbook 1378, Chapter 7.

Part 2 – Accessibility Requirements

Federal accessibility requirements apply to all RAD projects – whether they include new construction, alterations, or existing facilities. Applicable laws include, but are not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, and Titles II or III of the Americans with Disabilities Act (ADA). A PHA or Project Owner must comply with each law that applies to its project and with the requirement that provides the most accessibility when two or more laws apply. All three laws include new construction requirements. Substantial alterations, additions, rehabilitation and existing facilities must be in compliance with applicable requirements of Section 504 and the ADA.¹⁰⁶ All three laws may also require reasonable accommodations or modifications.

Accessibility Requirements for New Construction

The Fair Housing Act requires all “covered multifamily dwellings” designed and constructed for first occupancy after March 13, 1991, to be readily accessible to and usable by persons with disabilities. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas must meet the Fair Housing Act’s design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas must meet the Fair Housing Act’s design and construction requirements. The Fair Housing Act requires that all covered multifamily dwellings be designed and constructed so that public and common use areas are readily accessible to and usable by persons with disabilities; all doors are sufficiently wide to allow passage by persons using wheelchairs; all units contain accessible routes into and through the dwelling unit; light switches, electrical outlets, thermostats, and other environmental controls are in accessible locations; reinforcements are installed in bathroom walls to allow later installation

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

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

New construction of a multifamily housing project containing five or more dwelling units is also subject to physical accessibility requirements under Section 504. Under Section 504, a “project” includes all residential and appurtenant structures, equipment, roads, walks, and parking lots which are covered by a single contract or application for Federal financial assistance, or are treated as a whole for processing purposes, whether or not they are located on a single site.¹⁰⁹ The accessibility standards for new construction under Section 504 are the Uniform Federal Accessibility Standards (UFAS).¹¹⁰ HUD recipients may also use the 2010 ADA Standards for Accessible Design under title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”). This option exists until HUD formally revises its Section 504 regulation to adopt an updated accessibility standard. Refer to HUD’s Deeming Notice for more information.

Section 504 also requires that a minimum of 5% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with mobility impairments. An additional 2% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with vision and hearing impairments.¹¹¹ HUD may prescribe a higher percentage or number of units upon request by any affected recipient or by any State or local government or agency based upon demonstration to the reasonable satisfaction of HUD of a need for a higher percentage or number, based on census data or other available current data, or in response to evidence of a need for a higher percentage or number received in any other manner. In reviewing such request or otherwise assessing the existence of such needs, HUD shall take into account the expected needs of eligible persons with and without disabilities.¹¹²

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

¹⁰⁷ See 24 C.F.R. § 100.205.

¹⁰⁸ For more information about the design and construction provisions of the Fair Housing Act, see www.fairhousingfirst.org. See also the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Accessibility (Design and Construction) Requirements for Covered Multifamily Dwellings Under the Fair Housing Act (April 30, 2013), available at: www.hud.gov/offices/fheo/library/hudjointstatement.pdf.

¹⁰⁹ See 24 C.F.R. § 8.3.

¹¹⁰ The UFAS are available at <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/ufas>). See also 24 C.F.R. § 8.32.

¹¹¹ See 24 C.F.R. § 8.22.

¹¹² See HUD regulation at 24 C.F.R. § 8.22(c).

comply with program access and readily achievable barrier removal obligations that exist under Titles II or III of the ADA, must comply with the U.S. Department of Justice's ADA architectural accessibility standards as described in the following U.S. Department of Justice Technical Assistance document ADA Requirements, Effective Date/Compliance Date (Feb. 2011), http://www.ada.gov/revised_effective_dates-2010.htm.

Accessibility Requirements for Alterations

If a building was constructed for first occupancy after March 13, 1991, the building must be in compliance with, and all alterations must maintain the building's accessible features so that the building continues to meet, the Fair Housing Act's accessibility requirements. In addition, without regard to the date of construction for first occupancy, certain alterations may be required under the Fair Housing Act if requested by a resident as a reasonable accommodation or modification or otherwise required to remediate accessibility deficiencies in the design and construction of the building.

Under HUD's Section 504 regulation, alterations include any structural change in a facility or a change to its permanent fixtures or equipment. If alterations are undertaken to a project that has fifteen or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility, this qualifies as "substantial alterations," in which the new construction provisions of 24 C.F.R. § 8.22 apply.¹¹³

When alterations are made that do not qualify as substantial alterations, alterations to dwelling units in a multifamily housing project shall, to the maximum extent feasible, be made to be readily accessible to and usable by individuals with disabilities.¹¹⁴ If alterations of single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, the entire dwelling unit shall be made accessible. Once 5% of the dwelling units in a housing project are readily accessible to and usable by individuals with mobility impairments, no additional elements of dwelling units or entire dwelling units are required to be accessible under this provision. However, alterations to meet ongoing accessibility needs are always required, for example, in response to a reasonable accommodation request. Alterations to common areas or parts of facilities that affect accessibility of existing housing facilities shall, to the maximum extent feasible, be made to be accessible to and usable by individuals with disabilities. For purposes of this paragraph, the phrase "to the maximum extent feasible" shall not be interpreted as requiring that a recipient (including a PHA) make a dwelling unit, common area, facility or element thereof accessible if doing so would impose undue financial and administrative burdens on the operation of the multifamily housing project.¹¹⁵

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

¹¹³ See 24 C.F.R. § 8.23(a). The sole exception is that load bearing structural members are not required to be removed or altered.

¹¹⁴ HUD may require a higher number or percentage of accessible units pursuant to 24 C.F.R. § 8.22(c) and 24 C.F.R. § 8.23(b)(2).

¹¹⁵ 24 C.F.R. § 8.23(b).

regulations, unless subject to certain safe harbors identified in the 2010 ADA revised regulations for Titles II and III, as applicable.¹¹⁶

HUD will consider on a case-by-case basis a PHA's request to undertake limited new construction on the site of a Covered Project undergoing rehabilitation to comply with accessibility requirements on the site.

Additional Accessibility Requirements for Both New Construction and Alterations

Accessible units must be distributed throughout projects and sites and be available in a sufficient range of sizes and amenities so that a qualified individual with disabilities' choice of living arrangements is, as a whole, comparable to that of other persons eligible under the same program.¹¹⁷ This provision shall not be construed to require provision of an elevator in any multifamily housing project solely for the purpose of permitting location of accessible units above or below the accessible grade.

PHAs are encouraged to use universal design principles, visitability principles and active design guidelines in planning new construction or retrofit work, wherever feasible. However, adherence to universal design principles does not replace compliance with the accessibility requirements of Section 504, the ADA and the Fair Housing Act.

Program Accessibility Requirements

Under Section 504, recipients must operate each existing housing program or activity receiving Federal financial assistance so that the program or activity, when viewed in its entirety, is accessible to and usable by individuals with disabilities. Title II of the ADA also includes a program access requirement, while Title III of the ADA requires readily achievable barrier removal.¹¹⁸ Further, Section 504, the Fair Housing Act, and the ADA require that reasonable accommodations/modifications be granted to address disability-related needs of individuals with disabilities.¹¹⁹

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

¹¹⁷ See 24 C.F.R. §§ 8.26 and 8.27.

¹¹⁸ See 28 C.F.R. § 35.150; 28 C.F.R. § 36.304.

¹¹⁹ For more information on reasonable accommodations, see the HUD/DOJ Joint Statement on Reasonable Accommodations Under the Fair Housing Act at <http://portal.hud.gov/hudportal/documents/huddoc?id=JOINTSTATEMENT.PDF>. While this joint statement focuses on the Fair Housing Act, the principles discussed in the statement generally apply to requests for reasonable accommodation under Section 504, except, for purposes of Section 504, HUD recipients are required to provide and pay for structural modifications as a reasonable accommodation.

APPENDIX II: Recommended Relocation Plan Contents

While RAD mandates written relocation plans only for projects which involve permanent relocation (including, without limitation, a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than one year, HUD strongly encourages PHAs to document their relocation planning process and procedures in a written relocation plan. The following provides suggested content for required and recommended relocation plans. In the case of any discrepancy between this description of the recommended relocation plan contents and the provisions of the Notice to which this Appendix is attached or any applicable laws or regulations with respect to the URA or Section 104(d), the provisions of the Notice or applicable laws and regulations shall govern.

The basic elements of the relocation plan include:

- A general description of the project and project elements that may create relocation needs;
- Information on residents of the project and eligibility for relocation assistance and payments;
- Information regarding how the project will address the RAD right to return requirements and the project's re-occupancy policies;
- A detailed discussion of plans for temporary relocation assistance;
- A detailed discussion of any transfer of assistance;
- A detailed discussion of any offers of alternative housing options and plans for voluntary permanent relocation assistance;
- A detailed discussion of compliance with fair housing and civil rights requirements, including accessibility requirements;
- The relocation budget; and
- The appeals process.

The plan as a whole should discuss the specific steps to be taken to minimize the adverse impacts of relocation on the residents.

I. Project Summary

The Relocation Plan should provide a general description of the property (e.g., year built, location, number of units, configuration, resident population served). The project summary should also identify the nature of the activities to be undertaken, including acquisition, demolition, rehabilitation, and construction activities and additional detail regarding the project scope (e.g., gut rehab, systems replacement, modest in-unit renovations, transfer of assistance). The project summary should also discuss how any construction activities are to be implemented (i.e., vacate the property entirely, vacate specific floors or buildings, rehabilitation with residents in place). The summary should also discuss the overall theory of relocation, for example, whether a few households will be relocated off-site and the vacant units will be used as temporary housing before other households move back to their original units (a "hoteling" approach), or whether the vacant units will be permanently occupied, with the residents vacating other units to be renovated (a "domino" approach).

The relocation plan should also identify the funding sources which may trigger relocation requirements, with particular attention to the potential presence of HOME or CDBG funds which may trigger Section 104(d) requirements.

II. Project Occupancy

The Relocation Plan should provide information on occupancy of the property including the number of residents, their household type (family, elderly), any non-residential (commercial) occupants, and should identify how any routine needs (such as continuation of utilities such as telephone service) and civil rights compliance issues (for example, limited English proficiency, disabilities, reasonable accommodations and unit modifications that have been or may be necessary) shall be identified and addressed. The Relocation Plan may specify the community meetings, interviews and/or other processes that will be undertaken to assess the residents' needs.

The Relocation Plan should also address eligibility for relocation assistance and payments, applying the rules of the Notice to the particularities of the project.

III. Resident Return and Re-occupancy Policies

The Plan should address how the project will honor the RAD right to return requirements and the “no re-screening upon conversion” policy. With respect to residents who will be temporarily relocated, the Plan should include the methodology that will be used to determine the sequence in which residents will re-occupy units at the project after rehabilitation, demolition, and/or construction is completed, and to determine how residents are matched with units if the residents are not able to return to their original unit. For example, if units will come online in stages, the plan should outline how the PHA or Project Owner will determine when each resident will return to the property.

IV. Temporary Relocation Assistance

The plan should detail the temporary housing resources to be used, the anticipated duration of temporary relocations, notices to be provided and the temporary relocation assistance the PHA or Project Owner will provide for residents (Paragraph 2-7 of HUD Handbook 1378). Topics to be addressed in the Plan include:

- Temporary Housing Resources. The Plan should identify the nature and availability of the temporary housing resources the PHA or Project Owner anticipates using. On-site resources are generally preferred. However, in some cases, PHAs or Project Owners may need to use hotel rooms for short-term relocations, or market-rate apartments. If the PHA or Project Owner anticipates using other assisted housing resources (such as HCVs, public housing or other properties with regulatory restrictions), the PHA or Project Owner should take particular care to address regulatory issues.
- Allocation of Temporary Relocation Resources. The Plan should describe a fair and reasonable methodology for allocating temporary relocation housing to residents on a nondiscriminatory basis.
- Duration of Temporary Relocation. In the event that the Plan includes relocation which is anticipated to exceed one year, it should detail the requirements which apply to those

residents (such as the issuance of a *Notice of Relocation* to the resident covering eligibility for URA relocation assistance, the offer of permanent relocation assistance and payments at URA levels and, if conditions warrant, the subsequent issuance of a *Notice of Eligibility*) as distinct from requirements that apply to residents who are not relocated for more than one year.

- Packing and Moving Assistance. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
 - Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
 - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
 - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
 - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses. The PHA or Project Owner can choose to do one or more of the following:
 - Undertake the moves itself, using employees of the PHA or Project Owner or “force account labor”¹²⁰
 - Use a contractor or moving company
 - Reimburse residents for all actual, reasonable and necessary moving expenses.
- Storage. The Plan should address whether storage of the resident’s personal property is necessary and the arrangements for such storage.
- Damage or Loss. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or the replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
- Out-of-Pocket Expenses. The nature of out of pocket expenses vary based on the nature of the temporary relocation moves. For example, hotel stays or in-place renovation may trigger the need for reimbursement of meals while a kitchen is unavailable. The Plan should outline the anticipated out-of-pocket expenses and the PHA’s or Project Owner’s plans and budget with respect to these expenses.
- Leasing Arrangements. The Plan should address whether the resident will have a direct lease or other contractual relationship with the owner of the temporary relocation resource or whether the PHA or Project Owner will hold the lease and the resident will maintain a contractual relationship with the PHA or Project Owner.
- Utility Costs. The Plan should address whether residents will need to disconnect and reconnect necessary utilities and, if so, how the PHA or Project Owner anticipates managing this process and any associated expenses. Necessary utilities may include telephone, cable service, Internet access or other items. The Plan should address payment of utility deposits, if required at the temporary relocation housing (HUD Handbook 1378, paragraph 2-7(A)(3)).

¹²⁰ Defined at 24 C.F.R. 905.108.

- Reasonable Accommodations. The plan should address whether residents with disabilities will require reasonable accommodations during temporary relocation and, if so, how the PHA or Project Owner anticipates ensuring the provision of reasonable accommodations and any associated expenses. Reasonable accommodations may include, among other items, the provision of transportation assistance, relocation to locations which are physically accessible and located near public transportation, and modifications to policies to allow individuals with disabilities to reside with a live-in aide.

V. Transfer of Assistance

Relocation planning in the context of transfer of assistance is particularly complex. The PHA should address how RAD, URA and Section 104(d) requirements each apply, as the same activity may be treated differently under each regulatory framework. The Plan should specifically outline the PHA's procedures to ensure that the applicable requirements are applied to each situation appropriately. The Plan should also address whether relocation is required for any businesses or residents at the destination site. Finally, the Plan should address whether two moves – from the public housing site to an intermediate site and then to the transfer of assistance site – are necessary while the Covered Project is being constructed or rehabilitated.

VI. Alternative Housing Options and Voluntary Permanent Relocation Assistance

If the PHA or Project Owner seeks to offer alternative housing options, the Plan should identify those options and the manner in which they are presented to residents for decision. The plan should also outline the counseling the PHA or Project Owner will provide to assist the residents in determining what options may be available and the financial implications of those options, for example,

1. Discussion of whether units available in the market (either in the affordable market or the unrestricted market) will meet the financial and dwelling requirements of relocated residents;
2. The general area or location of unit(s);
3. Where applicable, the accessibility of such units for individuals with disabilities;
4. Criteria for receiving relocation assistance; and
5. Any other information that might benefit residents in their consideration of housing choices.

The Plan should identify how the PHA or Project Owner will work with any residents who have elected voluntary permanent relocation. The Plan should further include a description of the permanent relocation assistance the PHA or Project Owner will provide to such residents. Topics to be addressed in the Plan include:

- Replacement Housing. The Plan should address the availability of comparable replacement housing, the notices to be provided and the provisions to ensure that appropriate accessibility features are available in compliance with applicable laws and regulations.

- Fair housing considerations. The Plan should address referrals to housing not located in areas of minority concentration and compliance with requirements regarding accessible housing for persons with disabilities. The Plan should address how the PHA or Project Owner will determine if residents have paid for the acquisition and/or installation of accessible features in the housing from which they are being relocated and how the PHA or Project Owner will ensure that the replacement housing contains required and comparable accessible features or that the resident is appropriately compensated for the cost of acquiring and/or installing required and comparable accessible features.
- Packing and Moving Assistance. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
 - Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
 - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
 - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
 - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses consistent with 49 C.F.R. § 24.301 or, at the resident's option, 49 C.F.R. § 24.302.
- Storage. The Plan should address whether storage of the resident's personal property is necessary and the arrangements for such storage. See 49 C.F.R. § 24.301(g)(4).
- Damage or Loss. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or the replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
- Dislocation Allowance. The Plan should address when the resident is entitled to a dislocation allowance and the amount of such dislocation allowance, consistent with the URA Fixed Residential Moving Cost Schedule available at: www.fhwa.dot.gov/real_estate/uniform_act/relocation/moving_cost_schedule.cfm.
- Appliances. The Plan should address disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property.
- Security Deposits and Utility Costs. The Plan should address how the PHA or Project Owner anticipates managing transfer of utility arrangements, security deposits and any associated expenses. Utilities may include telephone, cable service, Internet access or other items that may have been in place in the resident's original home. See 49 C.F.R. § 24.301(h)(12).
- Replacement Housing Payment. The Plan should address the circumstances in which displaced residents may be entitled to a replacement housing payment (RHP) to cover the

increase, if any, in monthly housing costs for a 42-month period pursuant to URA requirements or a 60-month period pursuant to Section 104(d).¹²¹

VII. Relocation Budget

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

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

For temporary relocation moves:

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

For permanent moves:

- Number and cost of one-time moves into another unit in the same building/complex.
- Number and cost of one permanent move to a unit not within the same building/complex
- Any required dislocation allowance

- 4) The estimated cost of projected increases in monthly housing costs and other expenses for temporary relocation (if applicable).
- 5) The estimated cost of projected replacement housing payments (RHP) (42-month period for URA or 60-month period if Section 104(d) applies).
- 6) Contingency costs estimated for carrying out the relocation process necessary to complete the proposed project.

¹²¹ See also, CPD Notice 2014-09 "Effective Date of Moving Ahead for Progress in the 21st Century Act (MAP-21) Changes to Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) Payment Limits and Replacement Housing Payment Eligibility Criteria."

VIII. Written and Oral Communications with Individuals with Disabilities and LEP Persons and Use of Accessible Meeting Locations

The Plan should identify how the PHA or Project Owner will take appropriate steps to ensure effective communication with residents and other individuals with disabilities involved in the relocation, such as through the provision of sign language and other interpreters and large print, Braille, accessible electronic, and other alternate format written communications. The Plan should identify the measures to be taken to ensure the most integrated meeting settings appropriate to individuals with disabilities. The Plan should identify how the PHA or Project Owner will ensure meaningful access for LEP persons, such as through written materials and oral communications provided in languages other than English.

IX. Appeal Process

The Plan should specify the procedures to be followed if a resident disagrees with the PHA's or Project Owner's decision as to the resident's eligibility to receive relocation assistance, the amount of a relocation payment, or the adequacy of a comparable replacement dwelling offered to a resident. These procedures should include the process for filing a written appeal to the displacing agency and the specific appeal procedures to be followed consistent with 49 C.F.R. 24.10 (and 24 C.F.R. § 42.390 if Section 104(d) is involved).

X. Certification

The Plan should contain a certification of compliance with this Notice (or H 2014-09/PIH 2014-17, if applicable), the URA, fair housing and civil rights requirements and, if applicable, Section 104(d).

Technical Assistance

For detailed technical assistance regarding the contents or provisions of a written relocation plan, the PHA or Project Owner should direct questions to their RAD Transaction Manager or email rad@hud.gov.