

# **Final PHA Agency Plan**

## **Annual Agency Plan for Fiscal Year 2023**



**Gregory Russ**  
Chair

**Lisa Bova-Hiatt**  
Interim Chief Executive Officer

**Date: October 18, 2022**

<b>Annual PHA Plan (Standard PHAs and Troubled PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires: 03/31/2024</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, 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.** The 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 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, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 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.

<b>A.</b>	<b>PHA Information</b>					
A.1	<p><b>PHA Name:</b> New York City Housing Authority <b>PHA Code:</b> NY005  <b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA  <b>PHA Plan for Fiscal Year Beginning:</b> 01/2023  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units 162,143; Number of Section 8 Vouchers: 92,595. Total Combined Units/Vouchers 254,538</b>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission  <b>Availability of Information.</b> PHAs must have the elements listed below 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.  <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p>					
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
					PH	HCV
<b>B.</b>	<b>Plan Elements</b>					

<p><b>B.1</b></p>	<p><b>Revision of Existing Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?  Y N  <input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs  <input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.  <input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.  <input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.  <input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.  <input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.  <input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.  <input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.  <input checked="" type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.  <input checked="" type="checkbox"/> <input type="checkbox"/> Pet Policy.  <input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.  <input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.  <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):  <b>Please see Attachment A (PHA Plan Update)</b></p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.  <b>Please see Attachment F (Admissions Policy for Deconcentration)</b></p>
<p><b>B.2</b></p>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?  Y N  <input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.  <input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.  <input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.  <input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.  <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.  <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.  <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.  <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.  <input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.  <input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.  <input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.  <input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</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.  <b>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).</b>  <i>As of March 1, 2022, NYCHA has executed 175 HAP contracts for 19,858 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>
<p><b>B.3</b></p>	<p><b>Progress Report.</b>  Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.  <b>Please see Attachment E (Additional Information)</b></p>
<p><b>B.4</b></p>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.  <i>NYCHA submitted the FY 2022 Plan to HUD on April 11, 2022. The Plan was approved by HUD in EPIC on May 10, 2022.</i></p>
<p><b>B.5</b></p>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?  Y N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:  As described in the Schedule of Findings and Questioned Costs of the Single Audit Report, the Authority did not comply with requirements regarding Assistance Listing No. 14.850 Public Housing Operating Fund as described in finding number 2021-1 for</p>

	Special Tests and Provisions – Environmental Contaminants Testing and Remediation. During the Single Audit, Deloitte noted that the Authority did not complete all corrective actions to remediate environmental contaminants in the 2021 audit period (particularly lead paint and mold) and is in the process of addressing these issues.			
<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>			
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan? Y N <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>(c) Please see <b>Attachment M</b></p>			
<b>C.2</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <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>C.3</b>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>			
<b>C.4</b>	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan? Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements. Please see Attachment N</p>			
<b>C.5</b>	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>			
<b>D.</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b>			
<b>D.1</b>	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with <a href="#">24 CFR § 5.154(d)(5)</a>. Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at <a href="#">24 CFR § 903.7(o)</a> enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" style="width: 100%;"> <tr> <td><b>Fair Housing Goal:</b></td> </tr> <tr> <td><b><u>Describe fair housing strategies and actions to achieve the goal</u></b></td> </tr> <tr> <td>Currently, PHAs are not required to submit an AFH. 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. Please see pages 195 through 198 for information on NYCHA’s progress in its goal to “Promote Equal Opportunity in Housing”.</td> </tr> </table>	<b>Fair Housing Goal:</b>	<b><u>Describe fair housing strategies and actions to achieve the goal</u></b>	Currently, PHAs are not required to submit an AFH. 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. Please see pages 195 through 198 for information on NYCHA’s progress in its goal to “Promote Equal Opportunity in Housing”.
<b>Fair Housing Goal:</b>				
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Currently, PHAs are not required to submit an AFH. 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. Please see pages 195 through 198 for information on NYCHA’s progress in its goal to “Promote Equal Opportunity in Housing”.				

## 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](mailto:annualplancomments@nycha.nyc.gov) to schedule an appointment to review the documents.

<b>List of Supporting Documents Available for Local Review</b> <b>(Applicable to All PHA Plan Types)</b>		
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> <i>Public Housing Maintenance and Management:</i> <ul style="list-style-type: none"> <li>• NYCHA Management Manual</li> <li>• NYCHA Application and Tenancy Administration Manual</li> <li>• NYCHA Tenant Selection and Assignment Plan (TSAP) Manual</li> <li>• NYCHA Human Resources Manual</li> <li>• NYCHA Emergency Procedure Manual</li> <li>• NYCHA Procurement Policy Manual</li> <li>• NYCHA Capital Projects Division Procedures Manual</li> <li>• NYCHA Accounts Payable Procedures Manual</li> <li>• NYCHA Standard Procedures</li> <li>• NYCHA General Memoranda</li> <li>• NYCHA Deputy General Manager Memoranda</li> <li>• NYCHA Assistant Deputy General Manager Memoranda</li> <li>• NYCHA Interim Guidance</li> </ul>	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Deconcentration Income Analysis  <i>NYCHA's Deconcentration Income Analysis begins on page 203 of the Final Annual Plan.</i>	Annual Plan: Eligibility, Selection, and Admissions Policies

## List of Supporting Documents Available for Local Review

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

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	Any policy governing occupancy of Police Officers and Over-Income Tenants in Public Housing. <input type="checkbox"/> Check here if included in the public housing A&O Policy.  <i>NYCHA’s policy governing the occupancy of Police Officers is available in NYCHA’s Management Manual in Chapter III, NYCHA’s Standard Procedure SP003011 and on page 40 of the Final Annual Plan.</i>	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents. <input type="checkbox"/> Check here if included in the public housing A & O Policy.  <i>NYCHA’s rent determination policies are available in NYCHA’s Management Manual in Chapter III beginning on page 106 and on page 46 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 47-48 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 48 and 49 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
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

## List of Supporting Documents Available for Local Review

*(Applicable to All PHA Plan Types)*

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	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 107 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 210.</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
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 87.</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

**\*NEW DATE & LOCATION FOR NYCHA'S ANNUAL PLAN PUBLIC HEARING**

## **Public Hearing Notice**

**New York City Housing Authority Draft Significant Amendment to the Fiscal Year (FY) 2022 Annual Plan and the FY 2023 Draft Annual Plan**

NYCHA's Draft Significant Amendment to the Fiscal Year (FY) 2022 Annual Plan and FY 2023 Draft Annual Plan will be available for public inspection starting June 15, 2022, on NYCHA's website: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan). The plans will also be available at every development's management office. The Executive Summaries are available on NYCHA's website in English, Spanish, Russian, and Chinese. Please email [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov) if you would like to review the supporting documents.

The public is invited to comment on these plans at a public hearing on **Wednesday, August 31, 2022, from 5:30 p.m. to 8:00 p.m. at the Pace Schimmel Theater (3 Spruce Street in Manhattan)**. Please check in with Security (on the sidewalk) upon arrival. Attendees must provide proof of vaccination against COVID-19 (or, in the case of medical or religious exemptions, the results of a COVID-19 PCR test administered within 72 hours of arrival). The COVID-19 protocols are subject to change, so please visit [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) for the latest updates.

Due to the ongoing COVID-19 health crisis, the public hearing will be held as a hybrid meeting, so attendees can participate in person or virtually.

**Attending the hearing virtually (Zoom or phone):** Please register at [on.nyc.gov/aug-public-hearing-registration](https://on.nyc.gov/aug-public-hearing-registration) as soon as possible. Instructions on how to participate, as well as meeting materials, will be posted on [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) before the meeting. To attend by phone, dial 888-788-0099 at the time of the hearing and enter 869 9096 9748 as the meeting code.

**Interpretation services** will be available on Zoom in Spanish, Mandarin, Cantonese, Russian, and American Sign Language. Those attending by phone who require foreign language interpretation may dial 646-558-8656 and the following ID numbers at the time of the hearing for live interpretation: Spanish: 331 425 8640#, Mandarin: 461 857 9342#, Cantonese: 831 000 3543#, Russian: 804 869 1448#

**Attending the hearing in person:** Anyone wishing to speak on the items related to the plans should sign up to speak at [on.nyc.gov/public-hearing-survey](https://on.nyc.gov/public-hearing-survey) or by calling 212-306-3335. All speakers are asked to limit their remarks to three minutes.

The meeting can also be viewed live on NYCHA's website or after the meeting through a recording on NYCHA's website: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan).

You can also provide written comments about the plans. **Submissions must be received by September 2, 2022.** Comments can be faxed to 212-306-8888, mailed to the following address, or emailed to [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov). **Public Housing Agency Plan Comments, Church Street Station, P.O. Box 3422, New York, New York 10008-3422**



Requests for reasonable accommodations or language interpretation should be made by August 25, 2022, by emailing [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov) or calling 212-306-3335.

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.
此所居住區物業管理處辦公室提供本文件的譯本。
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Перевод этого документа находится в Офисе управления вашего жилищного комплекса.



**\*NUEVA FECHA Y LUGAR PARA LA AUDIENCIA PÚBLICA DEL PLAN ANUAL DE NYCHA**

## **Notificación de la audiencia pública**

El Borrador de la Enmienda Significativa al Plan Anual para el Año Fiscal (FY) 2022 y el Borrador del Plan Anual para el Año Fiscal (FY) 2023 de NYCHA estarán disponibles para su consulta pública a partir del 15 de junio de 2022, en el sitio web de NYCHA, en: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan). Los planes también estarán disponibles en la oficina de administración de cada residencial. Los Resúmenes Ejecutivos están disponibles en el sitio web de NYCHA en inglés, español, ruso y chino. Si desea consultar los documentos de respaldo, por favor, envíe un correo electrónico a: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov)

Se invita al público a comentar sobre estos planes en una audiencia pública el **miércoles 31 de agosto de 2022, de 5:30 p.m. a 8:00 a.m. p.m. en el Teatro Pace Schimmel (3 Spruce Street en Manhattan)**. Por favor, regístrese con el personal de seguridad (en la acera) a su llegada. Los asistentes deben proporcionar prueba de vacunación contra COVID-19 (o, en el caso de exenciones médicas o religiosas, los resultados de una prueba PCR COVID-19 administrada dentro de las 72 horas posteriores a la llegada). Los protocolos COVID-19 están sujetos a cambios, así que visite [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) para las últimas actualizaciones.

Debido a la actual crisis sanitaria de COVID-19, la audiencia pública se llevará a cabo de manera híbrida, de modo que los asistentes puedan participar en persona o virtualmente.

**Para participar en la audiencia virtualmente (Zoom o teléfono):** por favor, regístrese en: [on.nyc.gov/aug-public-hearing-registration](https://on.nyc.gov/aug-public-hearing-registration) lo antes posible. Las instrucciones sobre cómo participar, así como los materiales de la reunión, se publicarán en: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) antes de la reunión. Para participar por teléfono, marque el 888-788-0099, a la hora de la audiencia e introduzca el número 869 9096 9748 como código de la reunión.

**Habrán servicios de interpretación en Zoom, en español, mandarín, cantonés, ruso y lengua de signos americana.** Las personas que participen por teléfono y necesiten interpretación de una lengua extranjera podrán marcar el número 646-558-8656, seguido de los números de identificación que aparecen, a continuación, en el momento de la audiencia. Para obtener interpretación en directo marque: español: 331 425 8640#, mandarín: 461 857 9342#, cantonés: 831 000 3543# y ruso: 804 869 1448#

**Para participar en la audiencia en persona:** las personas que deseen hablar sobre los temas relacionados con los planes deben inscribirse para hablar en: [on.nyc.gov/public-hearing-survey](https://on.nyc.gov/public-hearing-survey) o llamar al número 212-306-3335. Se les pide a todos los participantes que limiten sus intervenciones a tres minutos.

La reunión también puede verse en directo en el sitio web de NYCHA o después de la reunión, por medio de una grabación, en el sitio web de NYCHA, en: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan).

También puede presentar comentarios por escrito sobre los planes. **Las propuestas deben recibirse antes del 2 de septiembre de 2022.** Los comentarios pueden enviarse por fax, al 212-306-8888, por correo postal a la dirección que aparece más abajo, o por correo electrónico a: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov).

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



Las solicitudes de adaptaciones especiales razonables deben hacerse antes del 25 de agosto de 2022, enviando un correo electrónico a [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov), o llamando al 212-306-3335.

## **Уведомление о публичном слушании**

Настоящим извещаем, что проект Значительной поправки (Significant Amendment) к Годовому плану на 2022 финансовый год (FY) и проекту Годового плана на FY 2023 будут доступны для публичного ознакомления, начиная с 15 июня 2022 года, на вебсайте NYCHA: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) и в офисе управления каждого жилищного комплекса. Краткий обзор Плана доступен на вебсайте NYCHA на английском, испанском, русском и китайском языках. Отправьте имейл по адресу: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov), если вы хотите ознакомиться с сопроводительными документами.

Общественность приглашается предоставить комментарии по поводу планов на публичном слушании, которое состоится в среду, 31 августа 2022 года, с 5:30 р.м. до 8:00 р.м. в Pace Schimmel Theater (3 Spruce Street в Манхэттене). Пожалуйста, по прибытии зарегистрируйтесь у службы безопасности (на тротуаре). Участники должны предоставить подтверждение вакцинации против COVID-19 (или, в случае медицинских или религиозных исключений, результаты PCR-теста на COVID-19, проведенного в течение 72 часов до прибытия). Протоколы COVID-19 могут быть изменены, поэтому посетите вебсайт [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) для получения последних обновлений.

В связи с продолжающимся кризисом общественного здравоохранения, вызванным COVID-19, публичное слушание будет проводиться как гибридное собрание, поэтому участники могут участвовать лично или виртуально.

**Для участия в слушании виртуально (по Zoom или телефону):** Зарегистрируйтесь на сайте [on.nyc.gov/aug-public-hearing-registration](https://on.nyc.gov/aug-public-hearing-registration) как можно скорее. Инструкции по участию, а также материалы собрания будут размещены перед его проведением на сайте [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan). Для участия по телефону наберите во время слушания 888-788-0099 и введите 869 9096 9748 в качестве кода собрания.

Услуги устного перевода будут доступны в Zoom на испанский, русский, китайский (пекинский и кантонский диалекты) языки и американский язык жестов. Принимающие участие в слушании по телефону и нуждающиеся в переводческих услугах жильцы могут позвонить во время слушания по тел. 646-558-8656 набрать следующие ID: испанский: 331 425 8640#, китайский (пекинский диалект): 461 857 9342#, китайский (кантонский диалект): 831 000 3543#, русский: 804 869 1448#

**Участие в слушании (очное):** Если вы хотите высказаться по вопросам, связанным с публичным слушанием, зарегистрируйтесь на сайте [on.nyc.gov/public-hearing-survey](https://on.nyc.gov/public-hearing-survey) или позвоните по тел. 212-306-3335. Всех выступающих просят ограничить свое выступление тремя минутами.

Собрание можно будет посмотреть в прямом эфире в YouTube или в записи на вебсайте NYCHA: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan).

Вы также можете предоставить письменные комментарии по поводу планов. Заявки должны быть получены до 2 сентября 2022 года. Комментарии принимаются по факсу: 212-306-8888, по почте (адрес указан ниже) или имейлу: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov)

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



Запросы на приемлемую модификацию (reasonable accommodation) должны быть отправлены до 25 августа 2022 г. по имейлу: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov) или поданы по тел. 212-306-3335.

**\*NYCHA年度機構計劃公共聽證會的新日期和地點**

## 通知

民眾可從 2022 年 6 月 15 日開始登陸紐約市房屋局 (NYCHA) 網站 ([on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)) 查閱或前往各個住宅區管理處辦公室索取「2022 財政年度機構計劃」重大修正案初稿和「2023 財政年度機構計劃」初稿。NYCHA 網站提供計劃行政概述的英文、西班牙文、俄文和中文版本。如想查閱計劃書的補助文件，請發送電郵至：[annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov)。

現誠邀各界人士參加於2022年8月31日，星期三，下午5時30分至晚上8時在位於紐約市曼哈頓區Spruce街3號的佩斯大學施密爾劇院 (Pace Schimmel Theater) 舉行的公開聽證會，對這些計劃書提出建議和意見。請於抵達後向保安人員(在人行道上)報到。與會者必須出示COVID-19新冠疫苗接種證明(持有醫療或宗教豁免證明的人士則需出示72小時內核酸檢測(PCR)陰性結果報告)。COVID-19新冠疫情的防範措施可以隨時更改，請上網：[on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)關注最新情況。

因持續發展的COVID-19新冠疫情仍存在健康風險，公共聽證會將以混合模式進行，與會者可選擇親自到場或遠程參加會議。

**遠程參加會議 (通過Zoom 或電話):** 請儘快上網登記報名，網址：[on.nyc.gov/aug-public-hearing-registration](https://on.nyc.gov/aug-public-hearing-registration)。請登陸網站：[on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)，了解參加會議方法及會議資訊材料。通過電話參加會議的人士可在會議召開時撥打電話：888-788-0099，接通後輸入會議密碼：869 9096 9748。

通過 Zoom 軟件召開的網絡會議將提供西班牙語、普通話、廣東話、俄語和美國手語翻譯服務。通過電話參加會議且需要傳譯服務的人士可在會議召開時撥打 646-558-8656 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：331 425 8640#，普通話：461 857 9342#，廣東話：831 000 3543#，俄語：804 869 1448#。

**到場參加會議:** 希望在公共聽證會上對機構計劃的相關事項發言的市民應預先登記報名，網址：[on.nyc.gov/public-hearing-survey](https://on.nyc.gov/public-hearing-survey) 或電話：212-306-3335。所有發言者的發言時間將被限制在三分鐘內。

市民亦可登陸 NYCHA 網站觀看會議直播或在會議結束後觀看錄影，網址：[on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)。

您亦可對機構計劃提供書面意見。請於 2022年9月2日前提交意見書並將意見書傳真至：212-306-8888，郵寄至下列地址，或電郵至：[annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov)。

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



如果需要合理便利措施安排，請於 2022 年 8 月 25 日前通過電郵：[annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov) 或電話：212-306-3335 提出申請。

## \*NYCHA年度机构计划公共听证会的新日期和地点

# 通知

民众可从2022年6月15日开始登陆纽约市房屋局(NYCHA)网站([on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)) 查阅或前往各个住宅区管理处办公室索取「2022 财政年度机构计划」重大修正案初稿和「2023 财政年度机构计划」初稿。NYCHA 网站提供计划行政概述的英文, 西班牙语, 俄文和中文版本。如想查阅计划书的补助文件, 请发送电邮至: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov)。

现诚邀各界人士参加于2022年8月31日, 星期三, 下午5时30分至晚上8时在位于纽约市曼哈顿区Spruce街3号的佩斯大学施密尔剧院(Pace Schimmel Theater)举行的公开听证会, 对这些计划书提出建议和意见。请于抵达后向保安人员(在人行道上)报到。与会者必须出示COVID-19新冠疫苗接种证明(持有医疗或宗教豁免证明的人士则需出示72小时内核酸检测(PCR)阴性结果报告)。COVID-19新冠疫情的防范措施可以随时更改, 请上网: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) 关注最新情况。

因持续发展的COVID-19新冠疫情仍存在健康风险, 公共听证会将以混合模式进行, 与会者可选择亲自到场或远程参加会议。

远程参加会议(通过Zoom或电话): 请尽快上网登记报名, 网址: [on.nyc.gov/aug-public-hearing-registration](https://on.nyc.gov/aug-public-hearing-registration)。请登陆网站: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan), 了解参加会议方法及会议资讯材料。通过电话参加会议的人士可在会议召开时拨打电话: 888-788-0099, 接通后输入会议密码: 869 9096 9748。

通过Zoom软件召开的网络会议将提供西班牙语, 普通话, 广东话, 俄语和美国手语翻译服务。通过电话参加会议且需要传译服务的人士可在会议召开时拨打 646-558-8656 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: 331 425 8640#, 普通话: 461 857 9342#, 广东话: 831 000 3543#, 俄语: 804 869 1448#。

到场参加会议: 希望在公共听证会上对机构计划的相关事项发言的公民应预先登记报名, 网址: [on.nyc.gov/public-hearing-survey](https://on.nyc.gov/public-hearing-survey) 或电话: 212-306-3335。所有发言者的发言时间将被限制在三分钟内。

市民亦可登陆NYCHA网站观看会议直播或在会议结束后观看录像, 网址: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)。

您亦可对机构计划提供书面意见。请于2022年9月2日或之前提交意见书并将意见书传真至: 212-306-8888, 邮寄至下列地址, 或电邮至: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov)。

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



如果需要合理便利措施安排, 请于2022年8月25日前通过电邮: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov) 或电话: 212-306-3335 提出申请。

**\*NEW DATE & LOCATION FOR NYCHA'S ANNUAL PLAN PUBLIC HEARING**



## **NYCHA's Draft Significant Amendment to the Fiscal Year (FY) 2022 Annual Plan and the FY 2023 Draft Annual Plan**

The Draft Significant Amendment to the FY 2022 Annual Plan and the FY 2023 Draft Annual Plan will be available for public inspection starting June 15, 2022, on NYCHA's website: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan). They will also be available at the management office of every NYCHA public housing development during regular business hours.

The public is invited to comment on these plans at a public hearing on **Wednesday, August 31, 2022**, from 5:30 p.m. to 8 p.m. at the Pace Schimmel Theater (3 Spruce Street in Manhattan). Please check in with Security (on the sidewalk) upon arrival. Attendees must provide proof of vaccination against COVID-19 (or, in the case of medical or religious exemptions, the results of a COVID-19 PCR test administered within 72 hours of arrival). The COVID-19 protocols are subject to change, so please visit [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) for the latest updates.

Due to the ongoing COVID-19 health crisis, the public hearing will be held as a hybrid meeting, so attendees can participate in person or virtually.

If you would like to attend the hearing virtually (Zoom or phone), please register at [on.nyc.gov/aug-public-hearing-registration](https://on.nyc.gov/aug-public-hearing-registration). To attend the meeting by phone, dial 888-788-0099 at the time of the hearing and enter 869 9096 9748 as the meeting code.

Interpretation services will be available on Zoom in Spanish, Mandarin, Cantonese, Russian, and American Sign Language. Those attending by phone who require foreign language interpretation may dial 646-558-8656 and the following ID numbers at the time of the hearing for live interpretation: Spanish: 331 425 8640#, Mandarin: 461 857 9342#, Cantonese: 831 000 3543#, Russian: 804 869 1448#



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



Requests for reasonable accommodations or language interpretation should be made by August 25, 2022, by emailing [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov) or calling 212-306-3335.

**\*NUEVA FECHA Y LUGAR PARA LA AUDIENCIA PÚBLICA DEL PLAN ANUAL DE NYCHA**



## **Borrador de la Enmienda Significativa al Plan Anual para el Año Fiscal (FY) 2022 y el Borrador del Plan Anual para el Año Fiscal (FY) 2023**

El Borrador de la Enmienda Significativa al Plan Anual para el Año Fiscal (FY) 2022 y el Borrador del Plan Anual para el Año Fiscal (FY) 2023 estarán disponibles para su consulta pública a partir del 15 de junio de 2022, en el sitio web de NYCHA, en: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan). También estarán disponibles en la oficina de administración de cada residencial de vivienda pública de NYCHA, durante el horario de atención al público.

Se invita al público a comentar sobre estos planes en una audiencia pública el **miércoles 31 de agosto de 2022**, de 5:30 p.m. a 8 p.m. en el Teatro Pace Schimmel (3 Spruce Street en Manhattan). Por favor, regístrese con el personal de seguridad (en la acera) a su llegada. Los asistentes deben proporcionar prueba de vacunación contra COVID-19 (o, en el caso de exenciones médicas o religiosas, los resultados de una prueba PCR COVID-19 administrada dentro de las 72 horas posteriores a la llegada). Los protocolos COVID-19 están sujetos a cambios, así que visite [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) para las últimas actualizaciones.

Debido a la actual crisis sanitaria de COVID-19, la audiencia pública se llevará a cabo de manera híbrida, de modo que los asistentes puedan participar en persona o virtualmente.

Si desea participar en la audiencia de manera virtual (Zoom o teléfono), por favor, regístrese en: [on.nyc.gov/aug-public-hearing-registration](https://on.nyc.gov/aug-public-hearing-registration). Para participar en la reunión por teléfono, marque el número 888-788-0099, a la hora de la audiencia pública, e introduzca el número 869 9096 9748 como código de la reunión.

Habrán servicios de interpretación en Zoom, en español, mandarín, cantonés, ruso y lengua de signos americana. Aquellas personas que participen por teléfono y necesiten interpretación de una lengua extranjera podrán marcar el número 646-558-8656, seguido de los números de identificación o ID que aparecen, a continuación, en el momento de la audiencia pública. Para obtener interpretación en directo marque: español 331 425 8640#, mandarín: 461 857 9342#, cantonés: 831 000 3543# y ruso: 804 869 1448#



Si desea hablar sobre los puntos relacionados con la audiencia pública, por favor, inscríbese en: [on.nyc.gov/public-hearing-survey](https://on.nyc.gov/public-hearing-survey), o llame al 212-306-3335.

Los detalles completos están aquí: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan).



Las solicitudes de adaptaciones especiales razonables deben hacerse antes del 25 de agosto de 2022 enviando un correo electrónico a: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov), o llamando al 212-306-3335.

**\*НОВЫЕ ДАТА И МЕСТО ПРОВЕДЕНИЯ ПУБЛИЧНОГО СЛУШАНИЯ ПО ГОДОВОМУ ПЛАНУ НУСНА**



**Проект Значительной поправки Жилищного управления г. Нью-Йорка (НУСНА) к Годовому плану агентства на 2022 финансовый год (FY) и проект Годового плана агентства на FY 2023**

Настоящим извещаем, что проект Значительной поправки (Significant Amendment) к Годовому плану на 2022 финансовый год (FY) и проекту Годового плана на FY 2023 будут доступны, начиная с 15 июня 2022 года, для публичного ознакомления на вебсайте NYCHA: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) и в офисе управления каждого жилищного комплекса NYCHA в обычные приемные часы.

Общественность приглашается предоставить комментарии по поводу планов на публичном слушании, которое состоится в среду, 31 августа 2022 года, с 5:30 р.м. до 8:00 р.м. в Pace Schimmel Theater (3 Spruce Street в Манхэттене). Пожалуйста, по прибытии зарегистрируйтесь у службы безопасности (на тротуаре). Участники должны предоставить подтверждение вакцинации против COVID-19 (или, в случае медицинских или религиозных исключений, результаты PCR-теста на COVID-19, проведенного в течение 72 часов до прибытия). Протоколы COVID-19 могут быть изменены, поэтому посетите вебсайт [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) для получения последних обновлений.

В связи с продолжающимся кризисом общественного здравоохранения, вызванным COVID-19, публичное слушание будет проводиться как гибридное собрание, поэтому участники могут участвовать лично или виртуально.

Если вы хотите участвовать в слушании виртуально (по Zoom или телефону), зарегистрируйтесь на вебсайте [on.nyc.gov/aug-public-hearing-registration](https://on.nyc.gov/aug-public-hearing-registration). Для участия по телефону наберите во время слушания 888-788-0099 и введите 869 9096 9748 в качестве кода собрания.

Услуги устного перевода будут доступны в Zoom на испанский, русский, китайский (пекинский и кантонский диалекты) языки и американский язык жестов. Принимающие участие в слушании по телефону и нуждающиеся в переводческих услугах жильцы могут позвонить во время слушания по тел. 646-558-8656 набрать следующие ID: испанский: 331 425 8640#, китайский (пекинский диалект): 461 857 9342#, китайский (кантонский диалект): 831 000 3543#, русский: 804 869 1448#



Если вы хотите высказаться по вопросам, связанным с публичным слушанием, зарегистрируйтесь на сайте [on.nyc.gov/public-hearing-survey](https://on.nyc.gov/public-hearing-survey) или по тел. 212-306-3335. Более подробная информация здесь: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)



Запросы на приемлемую модификацию (reasonable accommodation) должны быть отправлены до 25 августа 2022 г. по имейлу: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov) или поданы по тел. 212-306-3335.

**\*NYCHA年度機構計劃公共聽證會的新日期和地點**



**紐約市房屋局 (NYCHA) 「2022財政年度機構計劃」重大修正案初稿和「2023財政年度機構計劃」初稿**

民眾可於2022年6月15日起登陸紐約市房屋局 (NYCHA) 網站 (網址: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)) 查閱或於辦公時間前往NYCHA轄下各個公共房屋住宅區管理處辦公室索取「2022財政年度機構計劃」重大修正案初稿和「2023財政年度機構計劃」初稿。

現誠邀各界人士參加於**2022年8月31日**，星期三，下午5時30分至晚上8時在位於紐約市曼哈頓區Spruce街3號的佩斯大學施密爾劇院 (Pace Schimmel Theater)舉行的公開聽證會，對這些計劃書提出建議和意見。請於抵達後向保安人員(在人行道上)報到。與會者必須出示COVID-19新冠疫苗接種證明 (持有醫療或宗教豁免證明的人士則需出示72小時內核酸檢測(PCR)陰性結果報告)。COVID-19新冠疫情的防範措施可以隨時更改，請上網: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)關注最新情況。

因持續發展的COVID-19新冠疫情仍存在健康風險，公共聽證會將以混合模式進行，與會者可選擇親身或遠程參加會議。

如您想遠程參加聽證會(通過Zoom 或電話)，請儘快上網登記報名，網址: [on.nyc.gov/aug-public-hearing-registration](https://on.nyc.gov/aug-public-hearing-registration)。通過電話參加會議的人士可在會議召開時撥打電話：888 -788-0099，接通後輸入會議密碼：869 9096 9748。

通過Zoom軟件召開的網絡會議將提供西班牙語，普通話，廣東話，俄語和美國手語翻譯服務。通過電話參加會議且需要傳譯服務的人士可在會議召開時撥打646-558-8656 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：331 425 8640#，普通話：461 857 9342#，廣東話：831 000 3543，俄語：804 869 1448#。



如果您想在公共聽證會上對相關事項發表言論，請預先登記報名，網址: [on.nyc.gov/public-hearing-survey](https://on.nyc.gov/public-hearing-survey) 或電話: 212-306-3335。  
登陸網址了解詳情: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)。



如果需要合理便利措施安排，請於2022年8月25日前通過電郵: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov) 或電話: 212-306-3335 提出申請。



**\*NYCHA年度机构计划公共听证会的新日期和地点**



**纽约市房屋局 (NYCHA) 「2022财政年度机构计划」重大修正案初稿和「2023财政年度机构计划」初稿**

民众可于2022年6月15日起登陆纽约市房屋局 (NYCHA) 网站 (网址: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)) 查阅或于办公时间前往NYCHA辖下各个公共房屋住宅区管理处办公室索取「2022财政年度机构计划」重大修正案初稿和「2023财政年度机构计划」初稿。

现诚邀各界人士参加于**2022年8月31日**, 星期三, 下午5时30分至晚上8时在位于纽约市曼哈顿区 Spruce街3号的佩斯大学施密尔剧院 (Pace Schimmel Theater) 举行的公开听证会, 对这些计划书提出建议和意见。请于抵达后向保安人员(在人行道上)报到。与会者必须出示COVID-19新冠疫苗接种证明(持有医疗或宗教豁免证明的人士则需出示72小时内核酸检测 (PCR) 阴性结果报告)。COVID-19新冠疫情的防范措施可以随时更改, 请上网: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan) 关注最新情况。

因持续发展的COVID-19新冠疫情仍存在健康风险, 公共听证会将以混合模式进行, 与会者可选择亲身或远程参加会议。

如您想远程参加听证会(通过Zoom 或电话), 请尽快上网登记报名, 网址: [on.nyc.gov/aug-public-hearing-registration](https://on.nyc.gov/aug-public-hearing-registration)。通过电话参加会议的人士可在会议召开时拨打电话: 888-788-0099, 接通后输入会议密码: 869 9096 9748。

通过Zoom软件召开的网络会议将提供西班牙语, 普通话, 广东话, 俄语和美国手语翻译服务。通过电话参加会议且需要传译服务的人士可在会议召开时拨打646-558-8656 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: 331 425 8640#, 普通话: 461 857 9342#, 广东话: 831 000 3543, 俄语: 804 869 1448#。



如果您想在公共听证会上对相关事项发表言论, 请预先登记报名, 网址: [on.nyc.gov/public-hearing-survey](https://on.nyc.gov/public-hearing-survey) 或电话: 212-306-3335。登陆网址了解详情: [on.nyc.gov/nycha-annual-plan](https://on.nyc.gov/nycha-annual-plan)。



如果需要合理便利措施安排, 请于2022年8月25日前通过电邮: [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov) 或电话: 212-306-3335 提出申请。

## FY 2023 Final PHA Annual Plan Table of Contents

<b>EXECUTIVE SUMMARY .....</b>	<b>19</b>
<b>ATTACHMENT A: PHA PLAN UPDATE.....</b>	<b>32</b>
PHA PLAN ELEMENTS UPDATED .....	32
LOCATIONS OF COPIES OF THE ANNUAL PHA PLAN .....	32
PHA PLAN ELEMENTS.....	32
1. Eligibility, Selection and Admissions Policies.....	33
2. Financial Resources.....	45
3. Rent Determination.....	46
4. Operation and Management.....	50
5. PHA Grievance Procedures.....	52
6. Designated Housing for Elderly and Disabled Families.....	52
7. Community Service and Self-Sufficiency.....	75
8. Safety and Crime Prevention/VAWA.....	82
9. Pet Policy.....	87
10. Civil Rights Certification .....	89
11. Fiscal Year Audit.....	89
12. Asset Management .....	90
<b>ATTACHMENT B: DEMOLITION AND/OR DISPOSITION, CONVERSION OF PUBLIC HOUSING, HOMEOWNERSHIP, PROJECT-BASED VOUCHERS, AND RAD .....</b>	<b>91</b>
<i>DEMOLITION AND/OR DISPOSITION .....</i>	<i>94</i>
<i>CONVERSION OF PUBLIC HOUSING .....</i>	<i>107</i>
<i>HOMEOWNERSHIP .....</i>	<i>110</i>
<i>PROJECT-BASED VOUCHERS .....</i>	<i>111</i>
<i>RENTAL ASSISTANCE DEMONSTRATION PROGRAM (“RAD”) .....</i>	<i>112</i>
<b>ATTACHMENT C: CAPITAL IMPROVEMENTS – CAPITAL FUND ANNUAL STATEMENT AND 5-YEAR ACTION PLAN AND P/E REPORT AND SCHEDULE.....</b>	<b>168</b>
<b>ATTACHMENT D: HOUSING NEEDS.....</b>	<b>169</b>
<b>ATTACHMENT E: ADDITIONAL INFORMATION .....</b>	<b>175</b>
<i>STATEMENT OF PROGRESS IN MEETING MISSION AND GOALS .....</i>	<i>175</i>
<i>SIGNIFICANT AMENDMENT AND SUBSTANTIAL DEVIATION OR MODIFICATION OF THE AGENCY PLAN.....</i>	<i>199</i>
<i>RESIDENT ADVISORY BOARD RECOMMENDATIONS.....</i>	<i>200</i>
<i>ELECTION PROCESS FOR RESIDENTS ON THE PHA BOARD .....</i>	<i>200</i>
<i>STATEMENT OF CONSISTENCY WITH THE CONSOLIDATED PLAN.....</i>	<i>200</i>
<i>SECOND REPLACEMENT HOUSING FACTOR (RHF) FUNDING GROUPS.....</i>	<i>201</i>
<b>ATTACHMENT F: ADMISSIONS POLICY FOR DECONCENTRATION.....</b>	<b>202</b>
<b>ATTACHMENT G: COMMUNITY SERVICE DESCRIPTION OF IMPLEMENTATION.....</b>	<b>209</b>
<b>ATTACHMENT H: PHA MANAGEMENT ORGANIZATION CHART .....</b>	<b>214</b>
<b>ATTACHMENT I: ASSESSMENT OF SITE-BASED WAITING LIST .....</b>	<b>215</b>
<b>ATTACHMENT J: SMOKE FREE HOUSING STATEMENT.....</b>	<b>216</b>
<b>ATTACHMENT K: PUBLIC HOUSING RESIDENT ADVISORY BOARD MEMBERS .....</b>	<b>218</b>
<b>ATTACHMENT L: AGENDAS OF MEETINGS HELD WITH NYCHA’S RESIDENT ADVISORY BOARD (RAB) .....</b>	<b>220</b>
<b>ATTACHMENT M: COMMENTS FROM NYCHA’S RESIDENT ADVISORY BOARD (RAB).....</b>	<b>222</b>
<b>ATTACHMENT N: COMMENTS AND CHALLENGED ELEMENTS FROM THE PUBLIC .....</b>	<b>251</b>
<b>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.....</b>	<b>273</b>

## **Executive Summary**

### **NYCHA's Final Agency Plan for FY 2023**

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 2023 will be 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. The Final Plan will also be made available at the management office of every NYCHA public housing development during regular business hours.

NYCHA held a hybrid in person and virtual public hearing on August 31, 2022 and accepted written comments on the Draft Agency Plan through September 2, 2022. Please see the Notice on page 8. NYCHA met with the Resident Advisory Board members for their comments in six meetings from March to September 2022.

NYCHA's Final Agency Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) by October 18, 2022. 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 19 through 31. NYCHA aims to strengthen its business model through its Transformation Plan and raise much-needed capital funding for its developments through the recently authorized NYC Public Housing Preservation Trust, Permanent Affordability Commitment Together (PACT) initiative, and other preservation programs. 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 City Capital Action Plan, initiatives that are already underway, and projects focused on environmental resiliency and sustainability. Finally, NYCHA continues to pursue other initiatives that fund vital building and apartment upgrades.

#### **NYCHA's Transformation Plan and the NYC Public Housing Preservation Trust**

NYCHA's **Transformation Plan** is 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. The NYC Public Housing Preservation Trust, recently authorized by the State, can completely rehabilitate an initial 25,000 apartments 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 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, HUD and the United States Attorney's Office for the Southern District of New York (SDNY) concurred to NYCHA's 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 implementation 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.

These efforts include 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 was released in February 2022. The second part is expected to be released in the fall of 2022. Together, the Transformation Plan and the Implementation Plan will result in the Organizational Plan required under the HUD Agreement.

As of spring 2022, NYCHA has begun implementing 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.

Resident-facing business process changes include: a full revamping of our repair and work order management 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 central office reforms, including a comprehensive asset management strategy and a focus on human resources to ensure staffing at all sites and prevent vacancies that disrupt service delivery to residents.

## ***NYC Public Housing Preservation Trust***

In June 2022, the State legislature passed a bill establishing the New York City Public Housing Preservation Trust (the Trust), and it was signed into law by Governor Kathy Hochul.

To dramatically improve residents' quality of life through comprehensive building renovations while preserving all their rights and protections (including permanently affordable rent) and providing economic opportunities, NYCHA will transfer an initial 25,000 apartments to the Trust. NYCHA will continue to own and manage the properties, entering into a long-term ground lease with the Trust to secure Tenant Protection Vouchers, a subsidy worth double NYCHA's current federal subsidy. Similar to how other government entities raise revenue for capital improvements, the Trust will issue bonds that fund comprehensive building renovations (with input and partnership from residents at the development), including the latest sustainable technologies. And the Trust can hire better vendors who can complete high-quality work, faster.

The Trust bill went into effect 60 days after the date that Governor Hochul signed it into law. NYCHA must now meet certain obligations, such as publishing the draft resident opt-in voting procedures for public comment and incorporating appropriate feedback from residents into the final version of the voting procedures. The board members must also be appointed to conduct the Trust's business (which will include NYCHA residents). Transfers to the Trust will not happen without extensive resident engagement, including a vote by residents at properties proposed for transfer on whether they want the transfer to occur.

Future Annual Plans and Significant Amendments will include more detailed information on the Trust and on proposed leasehold transfers to the Trust.

## ***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 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.

The Agreement goals, as well as other priority areas, are outlined in the Goals Section of the Draft Agency Plan (pages 175 to 198). 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) analyzer. The XRF testing initiative was based on the standard of 1.0 mg/cm<sup>2</sup>, on December 1, 2021, the New York City Department of Housing Preservation and Development (HPD) issued a regulation changing the definition of lead-based paint from paint with lead content measured at 1.0 mg/cm<sup>2</sup> to paint with lead content measured at 0.5 mg/cm<sup>2</sup> for purposes of New York City’s Local Law 1. The XRF testing initiative to test 134,084 units was based on the 1.0 mg/cm<sup>2</sup> testing initiative. NYCHA attempted to test 118,634 units and completed tests in 107,783 units. When the City changed its standard, NYCHA suspended its program to test units at 1.0 mg/cm<sup>2</sup> and pivoted to retest the child under 6 units at the new, lowered threshold of 0.5 mg/cm<sup>2</sup>. As of September 30, 2022, LHCD has attempted 25,386 units and completed an inspection in 23,511 child under 6 units. 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 paint 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 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. NYCHA is also now scaling up its abatement effort to comply with the City’s change in standard. To ensure there are no lead-based paint hazards, NYCHA is retesting the child under 6 units at the new, lowered threshold. Following re-testing, NYCHA creates abatement work orders for positive units and offers to abate units in an expedited fashion if a resident relocates temporarily.

NYCHA began performing abatement of CU6 units at Bronx River in March 2022 and completed abatements in 31 units, including temporary resident relocation, as of September 2022 moving to

Wagner and will continue this effort at additional developments throughout 2022. In addition, NYCHA is conducting two rounds of visual assessments in TEMPO units.

**Mold:**

NYCHA has engaged in many initiatives in recent years to address mold, leak and ventilation issues authority-wide. From January through September of 2019, NYCHA completed the roll out of the *Mold/ Mildew Control in NYCHA Residential Buildings Standard Procedure*. NYCHA began working on its new leak standard procedure in April 2020 and has since completed one pilot test of the new procedure and is currently working through its second pilot test. In 2020, NYCHA began implementing its roof fan replacement and in-unit vent cleaning. Additionally in 2021, NYCHA published the Roof Fan Inspections at NYCHA Residential Buildings Standard Procedure in July which provided staff guidance on how to conduct monthly roof fan inspections to ensure they are operatable. As of September 2022, the vent cleaning initiative is 76% complete (66,145 vents cleaned and 100% were attempted) and is estimated to conclude in April of 2023. The Roof Fan SP introduced a standard process for performing monthly preventative maintenance roof fan inspections (and thereby addressing ventilation issues) authority-wide.

As of May 2022, NYCHA reached its noteworthy milestone to replace or retain 8,436 roof fans and began labeling the fans with their Maximo assets to tie the monthly inspections on the handheld devices to Maximo assets in the system. Also as of September 2022, NYCHA is engaging engineers to kick off its replacement and balancing of 90,000 in-unit and 10,000 public space fire dampers portfolio-wide. In May 2022, NYCHA additionally introduced the Enhanced Oversight Program (EOP) and the Mold and Leaks Performance Scorecard and Dashboard to identify and assist NYCHA consolidations requiring additional support to improve compliance with court-ordered mold and leak performance parameters. EOP is being utilized along with other projects (Operation Mold Cleanup, Mold Inspection Initiative, Mold Cleaning Initiative, Maintenance Workers Performing Mold Inspections) executed by the Office of Mold Assessment and Remediation (OMAR) on a parallel track to improve compliance. The initiatives are described in the sections below. Also in 2022, NYCHA added vendor capacity to address mold and leak work orders, and continued to train existing and new staff on the Mold Busters SP.

Over the next year, NYCHA will continue to execute the initiatives listed above to achieve the following goals:

- Decreasing mold incidence and recurrence
- Improving compliance related to key performance parameters including time to complete initial inspections, mold removal, remediation, and related repairs
- Ensuring that key staff are trained in mold inspections and remediation
- Rolling out the leak standard procedure and beginning to train staff on the enhanced leak inspection process

Despite these efforts, NYCHA recognizes that fully addressing the root causes of mold will require significant, comprehensive capital investments. 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 undertaken. Many of NYCHA's buildings are in a general state of disrepair with years, if not decades, of deferred maintenance needs. Many persistent mold and moisture issues within NYCHA buildings are 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 needed capital improvements vital to their infrastructure. NYCHA's decades-old buildings require \$40 billion to bring them to a state of good repair – a figure that increases by approximately \$1 billion with each passing 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 its properties with chronic mold and leak problems across its entire portfolio.

***Heat:***

In the 2021-2022 heat season, NYCHA resolved its heat outages on average in 8.3 hours. 97.8% of outages were resolved within 24 hours. One outage lasted over 48 hours. NYCHA continues to utilize 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. NYCHA also reviews the causes of outages to identify system components that may require extensive repair and or replacement. We then use this data to develop an operational investment strategy where we use operating dollars to make the identified repairs.

Each year, the Authority also develops a list of critical heat and hot water equipment and systems needing replacement or extensive repair. For the 2022-2023 heating season, the Authority identified \$35 million of investments in to three different areas including: Distribution, Equipment Replacements and Boiler Plant Upgrades. This is a significant increase in investment over the prior years. For the 2021-22 heating season, the Authority allocated approximately \$7.8 Million in funding, and during the 2019-20 heating season, the Authority allocated approximately \$21.4 million.

NYCHA completed its installation of heat sensors at 44 developments. NYCHA will work to make additional year-over-year improvements to its heat outage response times in the coming heat season.

Since the HUD Agreement was signed in 2019, NYCHA has replaced 82 boilers at 22 developments. NYCHA projects 3 additional boiler replacements for completion in 2022 and 36 boiler replacements in 2023, with a total of at least 346 boilers replaced through capital projects by the end of 2026. In addition, NYCHA has addressed 200 boilers through the Permanent Affordability Commitment Together (PACT) housing preservation initiative, and an additional 159 other boilers at 26 developments are now being addressed through the initiative. These investments will make heat more reliable for hundreds of thousands of residents.

***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. As of



September 2022, construction work for two elevators at Boston Road Plaza have been completed and both cars are in service. Construction phase activities have started for 201 elevators at eleven 11 developments. Ninety-five elevators are currently in design or procurement, the construction of which are slated to start in the last quarter of 2022 or first quarter of 2023. Construction is planned to start in 2023 at an additional one development to replace 30 elevators. Through NYCHA's capital plan, 298 elevators are now scheduled to be replaced by the end of 2024. Additional updates include:

- The implementation of NYCHA's Elevator Motor Room Air Conditioner Installation Initiative. As of September 2022, 99% of the installations are complete with 27 pending.
- As of September 2022, NYCHA's elevator in-house staff and vendors have completed the 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.
- Work began in fall 2021, and, as of September 2022, 161 (80%) elevators out of 200 have been completed.

#### ***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.

In connection with its goal to reduce the rat population, in February 2022, NYCHA met its goal of installing 8,000 door sweeps on basement doors with gaps. NYCHA also hired 26 exterminators to focus on rats on grounds and basements in the Rat Mitigation Zone, which is a group of developments identified through a partnership with DOHMH as having the highest rat population within NYCHA's portfolio. Additionally, NYCHA continues to work towards meeting response times laid out in the agreement: (a) respond to 75% of all rat complaints within 2 business days and to all rat complaints within 5 days and (b) respond to 75% of all other pest complaints within 7 days and to all other pest complaints within 10 days. Currently for resident complaints the average response time for rats is 6.56 days and 7.19 for all other pests.

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 have been awarded, with construction expected to start by 2023. By 2028, waste yards will be completely overhauled at 194 developments.

#### ***Public Housing Assessment System (PHAS) and Annual Inspections:***

As of August 2021, NYCHA completed the following key activities

- Completion of the first phase of PHAS/Uniform Physical Condition Standards (UPCS) standards training (three-day class) for Maintenance Workers and supervisors) with a training that reached 1,672 as of the end of December 2020; Launch of a two-day version of the training for Caretakers with a training that reached 2,766 staff as of the end of

December 2021; Launch of the online refresher course in 2022; and Launch of the three-day class for new staff or recently promoted staff in 2022.

- Completion of the pilot program for supervisory inspections of buildings and grounds; and launch to all applicable users in 2021.
- Completion and roll-out of a new standard procedure for Annual Apartment Inspections; and building a comprehensive dashboard to track progress.

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

- Completing PHAS/UPCS standards training for Caretakers and completing a three-hour refresher course for existing staff, as well as an ongoing bi-annual course for new employees;
- Monitoring completion of the supervisory inspection for buildings and grounds to proactively identify potential deficiencies and prevent against deceptive practices; and
- Completing the second phase of the PHAS dashboard and monitoring the completed 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 \$4.4M in funding made possible through the District Attorney of New York asset forfeiture process, NYCHA has designed and completed all the basketball 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.

Additionally, since 2020 NYCHA has completed basketball court installations at 3 developments totaling \$1.1M through Federal and City funding. At present, basketball court installations are being undertaken at 4 locations totaling \$2.0M utilizing funds from Federal, City and inclusive of a small Grant of \$500K from DANY. Finally, a budget of \$500K from State funding has been earmarked for basketball court renovation at 1 development to start within the next 2 years.

#### ***Recovery & Resilience:***

As of the end of Q2 2022, NYCHA had invested over \$2.64 billion in funding from FEMA, CDBG-DR, and insurance proceeds at the 35 developments most severely impacted by Superstorm Sandy. Completed work includes 72 new boilers providing heat and hot water to almost 3,415 units in 43 buildings, 185 roofs replaced, 96 full-power backup generators operational serving approximately 9,846 apartments in over 100 buildings, and storm surge protection installation at 18 developments protecting 107 buildings, ready for the 2022 hurricane season.

In October 2021, NYCHA released its Climate Adaptation Plan focused on preparing NYCHA facilities for the changed climate conditions New York City will experience in the coming decades. The plan focuses on the three major hazards identified by the New York City Panel on Climate Change (NPCC) as being the greatest threats to New York City residents: extreme heat, coastal flooding, and rainwater-driven flooding. NYCHA's plan focuses on identifying risks and building resilience into the

large pipeline of capital work that the authority will be completing in coming years, as well as on developing stand-alone resiliency projects to address particularly vulnerable developments.

In October 2021, NYCHA also released “NYCHA’s Urban Forest: A Vital Resource for New York City” presenting analysis of the value of NYCHA’s trees and what the Authority must do to preserve the benefits trees bring to residents. This report was produced in collaboration with several partner organizations: Green City Force (GCF), the US Forest Service’s New York City Urban Field Station, and The Nature Conservancy (TNC), with support from the Mayor’s Office of Climate and Environmental Justice (MOCEJ) and the New York City Department of Health and Mental Hygiene (NYCDOHMH). NYCHA and GCF are currently conducting an inventory of all trees, with funding and support from TNC, and pursuing funding to expand the in-house expertise on tree preservation and replacement. In 2021, NYCHA surveyed 13,776 trees in total, with 155 diverse species. Between 2019-2021, 34% of NYCHA’s total acreage has been inventoried. In 2022, NYCHA is planning to inventory over 165 acres at 34 developments.

NYCHA is continuing to pursue funding for the damage related to the remnants of Hurricane Ida, which took place in September 2021. NYCHA has identified major damage at 12 developments and minor damage at other developments. NYCHA is working with FEMA to align on the cost of repairs and potential mitigation opportunities to protect NYCHA developments against future storms. To supplement the anticipated FEMA funds, NYCHA has secured \$30M of CDBG-DR funds to cover the estimated local match and an additional \$30M for unfunded mitigation measures.

NYCHA is pursuing all available funding sources for resiliency, including via the newly expanded FEMA Building Resilient Infrastructure and Communities funding program and the Hazard Mitigation Grant Program, by developing compelling resiliency plans that maximize co-benefits to residents. In 2021/2022, NYCHA submitted two applications for the initial scoping of resilience hubs at developments and another for conceptual design studies for flood damage mitigation measures at four developments. A third application was submitted for Breukelen Houses to fund a stormwater management system to mitigate against extreme rain and flooding. In addition, NYCHA collaborated with DEP to submit an application to install cloudburst infrastructure at Clinton Houses. All four of those applications were selected for award, providing NYCHA with a total of \$500,000 in scoping funds and \$30 million in project funds from last year’s application cycle. Another application was submitted for St. Nicholas Houses to fund a heat mitigating retrofit; that application was not selected; however, it has been entered into another hazard mitigation funding application cycle and there is still a chance it will be selected, with results of that application expected in Q1 of 2023. Lastly, with MOCEJ, NYCHA pursued FEMA funding of \$150k for signage and communication with residents about resiliency measures, and was notified that those funds have been awarded as well. In 2023, NYCHA is submitting an application to FEMA’s BRIC program for stormwater protection measures at Nostrand Houses and Sheepshead Bay Houses. New York State’s environmental bond act will also be on the ballot this November and is expected to provide another potential source of resiliency funding.

### ***Energy & Sustainability:***

In 2021, NYCHA released new Sustainability Agenda which outlines its commitment to healthy and comfortable homes that showcase environmental stewardship and sustainable design.

NYCHA is committing to host 30 megawatts of renewable energy on public housing and PACT roofs by 2026. Between NYCHA's installations at five developments and PACT developers' installations at seven developments, a total of 5.2MW has been completed with an additional 1.4MW in construction at PACT sites and up to 8MW planned at NYCHA sites.

NYCHA and the NYC Department of Environmental Protection continue to develop their green infrastructure partnership to mitigate combined sewer overflows and improve the lives of public housing residents through the construction of nature-based stormwater management solutions. In 2022, 17 projects reached construction completion and 18 more finalized design with expected construction kickoff in 2024. The next round of construction will be managed by NYCHA and will include NYCHA resident hiring requirements.

Additionally, NYC is investing in cloudburst infrastructure at NYCHA developments to manage extreme rain events like Hurricane Ida. NYCHA and DEP received \$84M of mayoral funding to expand such installations to 7 sites in the Bronx, Brooklyn, Queens, and Manhattan. Design is complete at South Jamaica Houses while design is underway at Clinton Houses. On top of the NYC funding, NYCHA was awarded \$28.5M in FEMA BRIC grants to construct the cloudburst project at Clinton Houses and a similar project at the flood prone Breukelen development.

There are currently \$310M active Energy Performance Contracts, and \$17M in weatherization upgrades are completed or in construction. In August 2022, NYCHA, in collaboration with New York Power Authority and New York State Energy Research and Development Authority, selected two vendors, Midea America and Gradient, to develop affordable cold-climate window packaged heat pumps. An initial 30,000 will be produced to help NYCHA reach its 80% reduction of greenhouse gas emissions by 2050. NYCHA continues the implementation of the demonstration project to fully electrify 1471 Watson Avenue with heat pumps, induction stoves, and point-of-use water heaters in each apartment. This location will also receive a full plumbing upgrade through secured CDBG-DR funding.

NYCHA has awarded 2 Design-Build contracts for the design and construction of a pneumatic waste collection system at Polo Grounds Towers and the redesign of 7 waste yards. These 7 sites kick off \$463M in City Capital Action Plan upgrades of waste yards across the portfolio. The City Capital Action Plan also outlines \$116M for replacement of interior compactors. To expand NYCHA's sustainable waste collection, in September 2022, NYCHA released a Clean Curbs for All RFP to test mechanical collection at curbside collected sites. This initial pilot will employ sealed containers for waste and recyclables at sites where material is currently collected in loose bags on the curb and could provide more convenient disposal access for residents. NYCHA has also been awarded a grant to build and staff compost systems at 2 developments with Green City Force and Compost Power as partners.

### ***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 Trust, additional federal capital funding, or sources of capital funds from other levels of government. As outlined in the Transformation Plan, all capital investment fall under the purview of one department and position: the Chief Asset and Capital Management Officer (CACMO).

### **Leveraging new sources of revenue to preserve homes and renovate buildings**

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. This 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 12,200 apartments, home to approximately 33,000 New Yorkers, are under construction in the Bronx and Brooklyn, totaling \$2.8 billion in major upgrades. An additional 19,700 units are part of active development projects in the process of resident engagement or pre-development. In sum, NYCHA has approximately 35,000 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. In late 2021, NYCHA, together with resident leaders, selected a development team comprised of Essence Development (co-developer), The Related Companies (co-developer and property manager), and Related Construction (general contractor). The development team will work with residents to select a social services provider.

In developing the RFP to select the PACT partners, 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"> <li>• Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures</li> <li>• Financial Resources</li> <li>• Rent Determination</li> <li>• Operation and Management</li> <li>• Community Service and Self-Sufficiency</li> <li>• Demolition and Disposition, Conversion of Public Housing, Homeownership, Project Based Vouchers and Rental Assistance Demonstration (RAD)</li> <li>• Housing Needs</li> </ul>	<ul style="list-style-type: none"> <li>• Statement of Progress in Meeting Mission and Goals – FY 2020 to FY 2024</li> <li>• Admissions Policy for Deconcentration</li> <li>• Resident Advisory Board Members</li> <li>• PHA Management Organizational Chart</li> <li>• Agendas of Meetings Held with NYCHA’s Resident Advisory Board</li> <li>• Homeownership Program</li> <li>• Safety and Crime Prevention</li> <li>• Pet Policy</li> </ul>
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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 2023* 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](mailto:annualplancomments@nycha.nyc.gov) to schedule a time to review the Plan. *The Final Agency Annual Plan for FY 2023* is also available at the following locations:

- On NYCHA’s webpage, which is located at:  
<https://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) 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. Does the PHA request criminal records from local law enforcement agencies for screening purposes?

Yes  No

d. Does the PHA request criminal records from State law enforcement agencies for screening purposes?

Yes  No

e. Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

Yes  No

*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. The centers are taking appointments.*

*Elderly and the disabled can come in without an appointment.*

<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. 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?

- Yes  No

3. May families be on more than one list simultaneously? If yes, how many lists?

- Yes  No

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. The centers are taking appointments. Elderly and the disabled can come in without an appointment.*

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. Is this policy consistent across all waiting list types?

- Yes  No:

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:

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?

- Yes  No:

*While NYCHA does not plan to exceed the federal targeting requirements, slightly over 80% of the families admitted to public housing during calendar year 2021 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.*

1. *Families displaced for development renovation (either into a public housing apartment or a Section 8-assisted apartment with a voucher) 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. 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)

Yes  No:

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. 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?

- Yes  No

b. 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?

- Yes  No

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. 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?

- Yes  No:

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. Does the PHA request criminal records from local law enforcement agencies for screening purposes?

- Yes  No

c. Does the PHA request criminal records from State law enforcement agencies for screening purposes?

- Yes  No



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

*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 July 2022, the waitlist is opened in part for referrals from the following sources: (1) homeless referrals from New York City (NYC) agencies; (2) referrals from the New York City Administration for Children's Services (ACS) for youth in the Family Unification Program (FUP) whose assistance is expiring as a result of the term limit on their voucher without subsequent adequate housing; (3) referrals from ACS for FYI assistance for youth leaving foster care who are homeless or at risk of homelessness; (4) referrals by a prosecutorial or law enforcement agency for victims of domestic violence and intimidated witnesses; and (5) 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.*

## **(3) Search Time**

- a. Does the PHA give extensions on standard 60-day period to search for a unit?

- Yes  No

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

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?

Yes  No

b. Preferences

1. 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)

Yes  No

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 overcrowded 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**

- a. 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 3,385 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)]

<b>Financial Resources: 2022 Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2021 grants)</b>		
a) Public Housing Operating Fund	\$ 1,089,592,136	<i>Public Housing Operations</i>
b) Public Housing Capital Fund (2022 Grant)	\$708,752,984	<i>Public Housing Rehabilitation</i>
c) Annual Contributions for Section 8 Tenant-Based Assistance	\$ 1,458,461,616	<i>Section 8 Program Operations</i>
Other Federal Grants (list below)		
FSS Self Sufficiency	\$0	<i>Self Sufficiency Services</i>
<b>2. Prior Year Federal Grants (unobligated funds only) (as of August 31, 2022)</b>		
FY 2018 Capital Fund	\$0	<i>Modernization</i>
FY 2019 Capital Fund	\$17,713,653	
FY 2020 Capital Fund	\$113,584,927	
FY 2021 Capital Fund	\$209,968,602	
Replacement Housing Factor	\$1,372,785	<i>New affordable housing construction</i>
HOPE VI Revitalization	\$0	<i>New construction at Prospect Plaza</i>
Public Housing Development Grants	\$420,081	<i>Modernization of former City/State developments</i>
<b>3. Public Housing Dwelling Rental Income (includes City and State Developments)</b>	\$881,434,063	<i>Public housing operations, safety and security, and supportive services</i>
<b>1. 4. Other income</b> (list below)		
Other Revenue from Operations (includes City and State Developments)	\$ 33,722,390	<i>Public Housing Operations</i>
Interest Income	\$2,162,743	<i>Public Housing Operations</i>
Other Categorical Grants	\$5,009,888	<i>Improve residents' self-sufficiency, Summer intern program, and support for Resident Watch program</i>
Revenue earned from PACT transactions	\$ 56,171,636	<i>Public Housing Maintenance and Operations, loan to the Harlem River PACT transaction</i>

Financial Resources: 2022 Planned Sources and Uses		
Sources	Planned \$	Planned Uses
Miscellaneous Income (includes Debt Service)	\$232,575,134	Public housing operations, safety and security, and supportive services
<b>Total Resources</b>	<b>\$4,754,771,002</b>	

### **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. Has the PHA adopted any discretionary minimum rent hardship exemption policies?

- Yes  No

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

1. Does the PHA plan to charge rents at a fixed amount or percentage less than 30 percent of adjusted income?

- Yes  No

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. 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?
  - Yes  No

**(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, 2023:** *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 2023 Annual Reviews (with a new rent effective date of May 1, 2023):** *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.*

<b>Apartment Size</b>	<b>FY 2023 Fair Market Rent</b>	<b>NYCHA's FY 2023 Flat Rent</b>
Studio	\$2,123	\$1,699
1 Bedroom	\$2,170	\$1,736
2 Bedroom	\$2,451	\$1,961
3 Bedroom	\$3,078	\$2,463
4 Bedroom	\$3,316	\$2,653
5 Bedroom	\$3,813	\$3,051
6 Bedroom	\$4,311	\$3,449

## 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. Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

- Yes  No

*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](mailto: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.)

<b>Program Name</b>	<b>Units or Families Served at Year Beginning 2022</b>	<b>Expected Turnover</b>
Public Housing	162,143	3,895
Section 8 Vouchers	91,872	2.05%
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 11 NYCHA communities. This grant began on 08/23/20.	488 services provided to ROSS residents from reporting period of 01/01/2021 to 12/31/21	N/A
<b>Other Federal Programs (list individually)</b>		
City Harvest Mobile Market Program: New York first and largest food rescue organization, that helps to feed millions of New Yorkers who struggle to put meals on their tables.	3,648,873 lbs. of produce to 96,900 families in NYC during calendar year 2021, of which 3,214,847 lbs. were given to 85,668 NYCHA families	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 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. 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	An average of 1,244 residents served monthly during calendar year 2021	N/A

<p>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><b>Family Self Sufficiency Program:</b>  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>959 enrollments as of 12/31/21</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 Procurement Policy Manual*
- *NYCHA Capital Projects Division Procedures Manual*
- *NYCHA Accounts Payable Procedures Manual*
- *NYCHA Standard Procedures*
- *NYCHA General Memoranda*
- *NYCHA Deputy General Manager Memoranda*
- *NYCHA Assistant Deputy General Manager Memoranda*
- *NYCHA Interim Guidance*

*(2) Section 8 Management: (list below)*

- *NYCHA Leased Housing Department Memoranda*
- *NYCHA Section 8 Administrative Plan*

*Members of the public wishing to examine the Management and Maintenance Policies may email [annualplancomments@nycha.nyc.gov](mailto:annualplancomments@nycha.nyc.gov) for further information.*

## **5. PHA Grievance Procedures**

[24 CFR Part 903.7 (f)]

### **A. Public Housing**

1. 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?

Yes  No:

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. 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?

Yes  No

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. 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?

Yes  No

*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 through July 30, 2023.*

<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Baruch Houses Addition</b> 1b. Development (project) number: <b>NY005010600</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 197 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Mary McLeod Bethune Gardens</b> 1b. Development (project) number: <b>NY005010030</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?

6. Number of units affected: 210
7. Coverage of action (select one)
<input type="checkbox"/> Part of the development
<input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Borinquen Plaza I</b>
1b. Development (project) number: <b>NY005012430</b>
2. Designation type:
<input checked="" type="checkbox"/> Occupancy by only the elderly
<input type="checkbox"/> Occupancy by families with disabilities
<input type="checkbox"/> Occupancy by only elderly families and families with disabilities
2. Application status (select one)
<input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan
<input type="checkbox"/> Submitted, pending approval
<input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one)
<input type="checkbox"/> New Designation Plan
<input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 144
7. Coverage of action (select one)
<input checked="" type="checkbox"/> Part of the development
<input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Boston Road Plaza</b>
1b. Development (project) number: <b>NY005010390</b>
2. Designation type:
<input checked="" type="checkbox"/> Occupancy by only the elderly
<input type="checkbox"/> Occupancy by families with disabilities
<input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one)
<input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan
<input type="checkbox"/> Submitted, pending approval
<input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one)
<input type="checkbox"/> New Designation Plan
<input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 235
7. Coverage of action (select one)
<input type="checkbox"/> Part of the development
<input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>

1a. Development name: <b>Bronx River Addition</b> 1b. Development (project) number: <b>NY005010320</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 226 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Reverend Randolph Brown</b> 1b. Development (project) number: <b>NY005012520</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 200 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Cassidy-Lafayette</b> 1b. Development (project) number: <b>NY005011170</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities

<p>3. Application status (select one)</p> <p><input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input type="checkbox"/> Planned application</p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 30, 2021</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 380</p> <p>7. Coverage of action (select one)</p> <p><input type="checkbox"/> Part of the development</p> <p><input checked="" type="checkbox"/> Total development</p>
<b>Designation of Public Housing Activity Description</b>
<p>1a. Development name: <b>Chelsea Addition</b></p> <p>1b. Development (project) number: <b>NY005011340</b></p>
<p>2. Designation type:</p> <p><input checked="" type="checkbox"/> Occupancy by only the elderly</p> <p><input type="checkbox"/> Occupancy by families with disabilities</p> <p><input type="checkbox"/> Occupancy by only elderly families and families with disabilities</p>
<p>3. Application status (select one)</p> <p><input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input type="checkbox"/> Planned application</p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 30, 2021</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 96</p> <p>7. Coverage of action (select one)</p> <p><input type="checkbox"/> Part of the development</p> <p><input checked="" type="checkbox"/> Total development</p>
<b>Designation of Public Housing Activity Description</b>
<p>1a. Development name: <b>Claremont Parkway-Franklin Avenue</b></p> <p>1b. Development (project) number: <b>NY005013420</b></p>
<p>2. Designation type:</p> <p><input checked="" type="checkbox"/> Occupancy by only the elderly</p> <p><input type="checkbox"/> Occupancy by families with disabilities</p> <p><input type="checkbox"/> Occupancy by only elderly families and families with disabilities</p>
<p>3. Application status (select one)</p> <p><input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input type="checkbox"/> Planned application</p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 30, 2021</b></p>



<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 116</p> <p>7. Coverage of action (select one)</p> <p><input checked="" type="checkbox"/> Part of the development</p> <p><input type="checkbox"/> Total development</p>
<b>Designation of Public Housing Activity Description</b>
<p>1a. Development name: <b>College Avenue-East 165<sup>th</sup> Street</b></p> <p>1b. Development (project) number: <b>NY005013080</b></p>
<p>2. Designation type:</p> <p><input checked="" type="checkbox"/> Occupancy by only the elderly</p> <p><input type="checkbox"/> Occupancy by families with disabilities</p> <p><input type="checkbox"/> Occupancy by only elderly families and families with disabilities</p>
<p>3. Application status (select one)</p> <p><input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input type="checkbox"/> Planned application</p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 30, 2021</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 95</p> <p>7. Coverage of action (select one)</p> <p><input type="checkbox"/> Part of the development</p> <p><input checked="" type="checkbox"/> Total development</p>
<b>Designation of Public Housing Activity Description</b>
<p>1a. Development name: <b>College Point Rehab</b></p> <p>1b. Development (project) number: <b>NY005011860</b></p>
<p>2. Designation type:</p> <p><input checked="" type="checkbox"/> Occupancy by only the elderly</p> <p><input type="checkbox"/> Occupancy by families with disabilities</p> <p><input type="checkbox"/> Occupancy by only elderly families and families with disabilities</p>
<p>3. Application status (select one)</p> <p><input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input type="checkbox"/> Planned application</p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 30, 2021</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 13</p>

7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>John Conlon LIHFE Towers</b> 1b. Development (project) number: <b>NY005010910</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 216 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Edward Corsi</b> 1b. Development (project) number: <b>NY005010640</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 171 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>

1a. Development name: <b>Davidson</b> 1b. Development (project) number: <b>NY005013420</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 56 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>East 152<sup>nd</sup> Street-Courtlandt Avenue</b> 1b. Development (project) number: <b>NY005010280</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 130 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Marcus Garvey (Group A)</b> 1b. Development (project) number: <b>NY005012520</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities

<p>3. Application status (select one)</p> <p><input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input type="checkbox"/> Planned application</p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 30, 2021</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 86</p> <p>7. Coverage of action (select one)</p> <p><input checked="" type="checkbox"/> Part of the development</p> <p><input type="checkbox"/> Total development</p>
<b>Designation of Public Housing Activity Description</b>
<p>1a. Development name: <b>Glebe Avenue-Westchester Avenue</b></p> <p>1b. Development (project) number: <b>NY005010670</b></p>
<p>2. Designation type:</p> <p><input checked="" type="checkbox"/> Occupancy by only the elderly</p> <p><input type="checkbox"/> Occupancy by families with disabilities</p> <p><input type="checkbox"/> Occupancy by only elderly families and families with disabilities</p>
<p>3. Application status (select one)</p> <p><input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input type="checkbox"/> Planned application</p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 30, 2021</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 132</p> <p>7. Coverage of action (select one)</p> <p><input type="checkbox"/> Part of the development</p> <p><input checked="" type="checkbox"/> Total development</p>
<b>Designation of Public Housing Activity Description</b>
<p>1a. Development name: <b>Bernard Haber</b></p> <p>1b. Development (project) number: <b>NY005011660</b></p>
<p>2. Designation type:</p> <p><input checked="" type="checkbox"/> Occupancy by only the elderly</p> <p><input type="checkbox"/> Occupancy by families with disabilities</p> <p><input type="checkbox"/> Occupancy by only elderly families and families with disabilities</p>
<p>3. Application status (select one)</p> <p><input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input type="checkbox"/> Planned application</p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 30, 2021</b></p>
<p>5. If approved, will this designation constitute a (select one)</p>

<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
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Harborview Terrace</b> 1b. Development (project) number: <b>NY005010220</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 195 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>International Tower</b> 1b. Development (project) number: <b>NY005010910</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 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: <b>Kingsborough Extension</b> 1b. Development (project) number: <b>NY005010100</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 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: <b>Mayor Fiorello H. LaGuardia Addition</b> 1b. Development (project) number: <b>NY005010760</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 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: <b>Leavitt Street-34<sup>th</sup> Avenue</b> 1b. Development (project) number: <b>NY005011860</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly

<input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected:83 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Lower East Side I Infill</b> 1b. Development (project) number: <b>NY005011000</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 72 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Justice Thurgood Marshall Plaza</b> 1b. Development (project) number: <b>NY005010030</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application

4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 180
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Judge Max Meltzer Tower</b>
1b. Development (project) number: <b>NY005011000</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 231
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Middletown Plaza</b>
1b. Development (project) number: <b>NY005010340</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 179



7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Mayor John Purroy Mitchel</b> 1b. Development (project) number: <b>NY005011450</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 165 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Morris Park Senior Citizens Home</b> 1b. Development (project) number: <b>NY005012410</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 97 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Morrisania Air Rights</b>

1b. Development (project) number: <b>NY005012670</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 300
7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>New Lane Area</b>
1b. Development (project) number: <b>NY005010350</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 277
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Randall Avenue – Balcom Avenue</b>
1b. Development (project) number: <b>NY005010630</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one)

<input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 252
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>William Reid Apartments</b>
1b. Development (project) number: <b>NY005011670</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 230
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Ira S. Robbins Plaza</b>
1b. Development (project) number: <b>NY005011390</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan

<input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 150
7. Coverage of action (select one)
<input type="checkbox"/> Part of the development
<input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Eleanor Roosevelt I</b>
1b. Development (project) number: <b>NY005011350</b>
2. Designation type:
<input checked="" type="checkbox"/> Occupancy by only the elderly
<input type="checkbox"/> Occupancy by families with disabilities
<input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one)
<input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan
<input type="checkbox"/> Submitted, pending approval
<input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one)
<input type="checkbox"/> New Designation Plan
<input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 159
7. Coverage of action (select one)
<input checked="" type="checkbox"/> Part of the development
<input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Shelton Houses</b>
1b. Development (project) number: <b>NY005010910</b>
2. Designation type:
<input checked="" type="checkbox"/> Occupancy by only the elderly
<input type="checkbox"/> Occupancy by families with disabilities
<input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one)
<input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan
<input type="checkbox"/> Submitted, pending approval
<input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one)
<input type="checkbox"/> New Designation Plan
<input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 155
7. Coverage of action (select one)
<input type="checkbox"/> Part of the development
<input checked="" type="checkbox"/> Total development

<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Sondra Thomas Apartments</b> 1b. Development (project) number: <b>NY005011270</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 87 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Peter Stuyvesant Gardens II</b> 1b. Development (project) number: <b>NY005012210</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 150 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Surfside Gardens</b> 1b. Development (project) number: <b>NY005011700</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities

<input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 270 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Twin Parks East (Site 9)</b> 1b. Development (project) number: <b>NY005012270</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 219 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Union Avenue-East 163<sup>rd</sup> Street</b> 1b. Development (project) number: <b>NY005013420</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>

5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 200 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>UPACA (Site 5)</b> 1b. Development (project) number: <b>NY005012410</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 200 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>UPACA (Site 6)</b> 1b. Development (project) number: <b>NY005012410</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 150

7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Van Dyke II</b> 1b. Development (project) number: <b>NY005011680</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 112 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Vandalia Avenue</b> 1b. Development (project) number: <b>NY005011940</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 293 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>West Brighton II</b>



1b. Development (project) number: <b>NY005010130</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 144
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>West Tremont Avenue-Sedgwick Avenue</b>
1b. Development (project) number: <b>NY005010450</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation <b>approved</b> , submitted, or planned for submission: <b>July 30, 2021</b>
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 148
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
<b>Designation of Public Housing Activity Description</b>
1a. Development name: <b>Gaylord White</b>
1b. Development (project) number: <b>NY005010090</b>
2. Designation type: <input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities

<p>3. Application status (select one)</p> <p><input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input type="checkbox"/> Planned application</p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 30, 2021</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 248</p> <p>7. Coverage of action (select one)</p> <p><input type="checkbox"/> Part of the development</p> <p><input checked="" type="checkbox"/> Total development</p>
<b>Designation of Public Housing Activity Description</b>
<p>1a. Development name: <b>Carter G. Woodson</b></p> <p>1b. Development (project) number: <b>NY005011680</b></p>
<p>2. Designation type:</p> <p><input checked="" type="checkbox"/> Occupancy by only the elderly</p> <p><input type="checkbox"/> Occupancy by families with disabilities</p> <p><input type="checkbox"/> Occupancy by only elderly families and families with disabilities</p>
<p>3. Application status (select one)</p> <p><input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input type="checkbox"/> Planned application</p>
<p>4. Date this designation <b>approved</b>, submitted, or planned for submission: <b>July 30, 2021</b></p>
<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input checked="" type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 407</p> <p>7. Coverage of action (select one)</p> <p><input type="checkbox"/> Part of the development</p> <p><input checked="" type="checkbox"/> Total development</p>

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

[24 CFR Part 903.7 (I)]

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

1. Cooperative agreements:

Has the PHA entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

Yes  No:

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
- Emergency Housing Voucher MOU – July 1, 2021
- Emergency Housing Voucher Data Sharing – July 22, 2021
- Emergency Housing Voucher Data Sharing Amendment – September 10, 2021
- Emergency Housing Voucher Data Sharing Amendment – November 1, 2021
- Emergency Housing Voucher Data Sharing Amendment – November 12, 2021
- HRA MOU for Data Verification through Worker Connect – December 15, 2021
- Emergency Housing Voucher Data Sharing Amendment – December 23, 2021
- Emergency Housing Voucher Data Sharing Amendment – February 9, 2022
- Emergency Housing Voucher Data Sharing Amendment – August 15, 2022
- ERAP Reimbursement HRA Data Sharing – November 9, 2021
- ERAP Reimbursement HRA MOU – December 30, 2021
- HRA Rental Arrears Data Sharing MOU – July 19, 2018

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

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

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

**(1) General**

a. Self-Sufficiency Policies

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

Public housing rent determination policies:

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

Public housing admissions policies:

*Working family priorities are assigned by income tier with the first number representing Tier III (households with incomes between 51% and 80% AMI), followed by Tier II (households with incomes between 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

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.)

Yes  No

Program Name	Units or Families Served at Year Beginning 2022	Expected Turnover
<p><b>ROSS Service Coordinator Grant 2019:</b> 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>488 services provided to ROSS residents from reporting period 01/01/21 to 12/31/21</p>	<p>N/A</p>

<p><b>Family Self Sufficiency Program:</b> 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>959 program enrollments as of 12/31/21</p>	<p>N/A</p>		
<p><b>Services and Programs</b></p>				
<p>Program Name &amp; Description (including location, if appropriate)</p>	<p>Estimated Size</p>	<p>Allocation Method (waiting list/random selection/specific criteria/other )</p>	<p>Access (development office / PHA main office / office / another provider name)</p>	<p>Eligibility (public housing or section 8 participants or both)</p>
<p><b>NYCHA's Office of Resident Economic Empowerment and Sustainability (REES) Intake &amp; Assessment</b></p>				
<p><b>REES and Partner Information Sessions:</b> 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</p>	<p>3,129 attendees at an information session from reporting period 01/01/21 to 12/31/21</p>	<p>Self-referred, unemployed and under-employed public housing &amp; Section 8 residents</p>	<p>REES offices located at central office location in Downtown Brooklyn / Offsite information sessions at NYCHA campuses and/or virtually</p>	<p>Public Housing Residents/ Section 8 Residents</p>
<p><b>REES Hotline Activity:</b> 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.</p>	<p>9,562 calls handled from reporting period 01/01/21 to 12/31/21</p>	<p>Self-referred, unemployed and under-employed public housing &amp; section 8 residents</p>	<p>Via phone</p>	<p>Public Housing /Section 8 residents</p>
<p><b>REES Microsite Activity:</b> The microsite provides information about economic opportunity services, events and job opportunities available through REES and its partners. Residents can use the site to take action and "self-refer" to programs through downloadable referral slips and RSVP for events.</p>	<p>146,101 unique visitors from reporting period 01/01/21 to 12/31/21</p>	<p>Self-referred, unemployed and under-employed public housing &amp; section 8 residents</p>	<p>Via REES' microsite: <a href="http://www.opportunitynycha.org">www.opportunitynycha.org</a></p>	<p>Public Housing / Section 8 residents</p>
<p><b>REES Job Placement</b></p>				
<p>Direct job placement facilitated by REES through the Section 3 mandate, the NYCHA REP policy, the NYCHA Resident Training Academy, and outside employers</p>	<p>621 direct job placements from reporting period 01/01/21 to 12/31/21</p>	<p>Self-referred unemployed and under-employed public housing residents</p>	<p>REES offices located at central office location in Downtown Brooklyn</p>	<p>Public Housing Residents</p>

<p><b>Section 3:</b>  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>	<p>932* Projected Hires on contracts awarded from reporting period 01/01/21 to 12/31/21*<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></p>	<p>Public Housing and Section 3 Residents</p>	<p>REES offices at Downtown Brooklyn, Contractor and work locations throughout NYCHA</p>	<p>Public Housing &amp; Section 3 residents</p>
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<p><b>Jobs Plus:</b> Through 13 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> <p>In 2021 through a \$17 million city-investment, three (3) new Jobs-Plus sites opened, and 7 existing sites expanded, growing Jobs-Plus sites from 10 sites serving 26 NYCHA developments, to 13 sites serving 44 developments citywide.</p> <ul style="list-style-type: none"> <li>Jobs-Plus is administered by NYCHA, The NYC Human Resources Agency/Department of Social Services (HRA/DSs), NYC Office of Economic Opportunity (NYC Opportunity) and the NYC Office of Financial Empowerment (OFE)</li> <li>1 of the 13 Jobs-Plus sites is funded through the HUD Jobs Plus Initiative Grant and will close in March 2022.</li> </ul>	<p>57 verified placements from reporting period 01/01/21 to 12/31/21</p> <p>((Additional placements are pending verification).</p>	<p>Public Housing Residents</p>	<ul style="list-style-type: none"> <li>East Harlem – Urban Upbound</li> <li>South Bronx Site I – Bronx Works</li> <li>South Bronx Site II –East Side Settlement House</li> <li>Western Queens I – Urban Upbound</li> <li>Western Queens II- Urban Upbound</li> <li>Western Queens III- America Works of NY, Inc.</li> <li>Lower East Side – Henry Street Settlement House</li> <li>Central Brooklyn – Bedford Stuyvesant Restoration Corporation</li> <li>Brownsville Brooklyn I- FedCap</li> <li>Brownsville Brooklyn II- America Works of NY, Inc.</li> <li>Northwest Bronx – Goodwill Industries</li> <li>Staten Island –</li> <li>Equus Workforce Solutions</li> <li>East New York, Brooklyn– Bedford Stuyvesant Restoration Corporation</li> <li></li> </ul>	<p>Public Housing Residents</p> <p>Must be a public housing resident of one of 44 targeted developments City-wide.</p>
<p><b>REES Connection to Services</b></p>				

<p><b>Recruitment for Cohort Based Services and program enrollment:</b>  Services in the following categories are offered through REES partners in the five boroughs</p> <ul style="list-style-type: none"> <li>• Vocational Training</li> <li>• Adult Education</li> <li>• Financial Education</li> <li>• Business Development</li> </ul>	<p>1029 enrollments in classes and trainings as of reporting period  01/01/21to  12/31/21</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><b>Referrals to Ongoing Services:</b> Services in the following categories are offered through REES partners in the five boroughs</p> <ul style="list-style-type: none"> <li>• Vocational Training</li> <li>• Adult Education</li> <li>• Financial Counseling</li> <li>• SNAP Access</li> <li>• Workforce Development</li> <li>• Business Planning</li> </ul>	<p>1093 unique residents were referred to ongoing services from reporting period  01/01/21 to  12/31/21</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><b>NYCHA Resident Training Academy (NRTA):</b> 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>323 graduates in the NRTA program year as of reporting period 01/01/21 to 12/31/21</p>	<p>Public housing residents are recruited through multiple outreach channels and complete an initial pre-screen with REES staff. Program referrals are based on testing, pre-screening, interest, and other eligibility requirements and qualifications</p>	<p>City Technical College/ Brooklyn Workforce Innovations</p>	<p>Public Housing Residents</p>
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**2) Family Self Sufficiency Program**

a. Participation Description

Program	Actual Number of Enrolled Participants (As of: 12/31/21)
Public Housing	0
Section 8	959

b. 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:

Yes  No

Since the fall of 2010, REES has operated the Housing Choice Voucher (“HCV”) (Section 8) Family Self Sufficiency (“FSS”) program. As of December 31, 2021, the program has 959 participants enrolled, of which 451 or 47% percent have escrow accounts averaging over \$7,049 for each participant. In 2021 the program enrolled 51 participants and graduated 58 residents disbursing a total of \$643,955. NYCHA was awarded a 2021 Family Self Sufficiency grant for three (3) Coordinators.

In 2021, due to the ongoing pandemic, NYCHA’s offices were not open to the public and we offered virtual FSS Information Sessions twice monthly with a morning session and an evening session. In mid-2021, the FSS staff began meeting residents in the NYCHA REES building lobby to accept completed enrollment forms and distribute blank enrollment forms to support residents who did not have the technology, or digital literacy, needed to submit forms or complete forms

electronically. In May 2021, two (2) of the FSS staff completed the Nan McKay Self Sufficiency Service Coordination training workshop series.

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**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 (VAWA)**

[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 use 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:** This program is no longer supported. NYCHA is in contact with the Mayor's Office to Combat Domestic Violence (OCDV) which was established in 2001 and provides a variety of services. In addition to offering services directly to residents, the agency develops policy and works with diverse communities to increase awareness of domestic violence.

**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

## **G. 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.

## **9. Pet Policy**

### **1. Dog/Cat**

It is NYCHA policy to allow one pet (a dog or a cat) per household. Such dog or cat must be registered in accordance with NYCHA's pet registration requirements.

### **2. Weight and Breed Restriction**

Any dog registered with NYCHA on or after February 1, 2010, cannot exceed a maximum weight of 25 pounds in adulthood. The following breeds are prohibited: Pit Bull, Rottweiler, and Doberman Pincher. Assistance animals are exempt from weight and breed restrictions.

### **3. Registration**

All tenants must register their dog, cat, or assistance animal with NYCHA (i) during the lease-up process (new tenants); (ii) as soon as the tenant acquires a dog, cat, or assistance animal; or (iii) when a tenant is adding a new pet or assistance animal to replace a pet or assistance animal that is no longer in the household (e.g. the animal has passed away), the tenant must complete and submit NYCHA form 040.299B, Animal Removal Agreement. **Any** dog, cat or assistance animal that is not registered with NYCHA is prohibited from living in a NYCHA apartment or NYCHA premises.

### **4. Dog Tag**

All dogs (even dogs that are assistance animals), regardless of registration date with NYCHA, must be licensed with DOHMH (Health Code §161.04) and must wear two tags around the neck: a NYC license tag and stainless steel NYCHA dog tag.

### **5. Assistance Animals**

There are two types of assistance animals: service animals and support animals.

(1) A service animal is a dog that is individually trained to take a specific action when needed for a person with a disability (e.g., seeing eye dog assisting a blind individual). (2) A support animal is an animal that does work, performs tasks, provides assistance, and/or provides therapeutic emotional support for an individual with disabilities. A support animal does not have to be individually trained or certified.

Tenants seeking a reasonable accommodation for an assistance animal must complete NYCHA *Form 040.505, Dog, and Cat, and Assistance Animal Registration Form*, and, if the disability is not visible, must also complete NYCHA *Form, 040.426, Medical Verification Form*. All assistance animals must be registered.

### **6. Small domestic pets kept in a cage or an aquarium**

Tenants may keep a reasonable number of small domestic pets such as hamsters, small birds, and fish, provided the pet is kept in a cage or an aquarium. These pets cannot create a nuisance or an unsafe or unsanitary condition. Registration is not required for these types of pets.

### **7. Prohibited Animals**

NYCHA prohibits (1) unconventional pets or endangered animals such as barnyard animals

(farm animals including, but not limited to, cattle, horses, chickens, turkeys, ducks, geese, pigs, goats, and sheep), reptiles, arachnids (spiders), monkeys), and other animals, as specified by New York State and New York City local laws and health code; and (2) animals deemed dangerous, vicious, or threatening also are prohibited. Registered pets or assistance animals that are or become dangerous, vicious, or threatening are not permitted and must be removed from the apartment.

#### **8. Pet and Assistance Animal Conduct**

Tenants must control the noise of pets and assistance animals so that it does not become a nuisance to other tenants by interrupting their peaceful enjoyment of their apartment or the development premises. A pet must not damage NYCHA property or premises, including buildings (inside or outside an apartment), elevators, common grounds, trees, shrubs or ground cover.

#### **9. Pet Waste**

Tenants must take adequate steps to eliminate any odors coming from their pets and/or assistance animals within their apartment and maintain the cleanliness of their apartment at all times. Cats must use litter boxes located inside the tenant's apartment. The litter boxes must be cleaned regularly. Tenants are not allowed to let waste accumulate. Waste is to be placed in a plastic bag, closed, and disposed of properly (e.g., throwing the bag in the garbage). Tenants must not dispose of animal waste, including kitty litter, in the toilet or household drains.

#### **10. Dog Leash**

In accordance with New York City's Leash Law (Health Code § 161.05), dogs must be restrained by a leash or chain not more than six feet in length when the animal is in a public place (except in designated off leash areas).

#### **11. Pet-Free Zone**

Tenants must keep dogs, cats, and other animals out of "pet-free zones," such as Management Offices, playgrounds, community facilities, laundry rooms, basement areas, barbecue areas, roofs or roof landings. Note that a registered assistance animal may enter a "pet-free zone," as necessary, provided the animal is on a leash of not more than six feet in length.

#### **12. Spay/Neuter**

Dogs cats, and assistance animals must be spayed or neutered. Proof must be submitted with the NYCHA registration form.

#### **13. Vaccination**

Tenants must ensure that their cats, dogs, and assistance animals are vaccinated for rabies. Vaccinations must be current and up to date as per New York City Health Code § 161.06.

#### **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. 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.)

Yes  No

2. Was the most recent fiscal audit submitted to HUD?

Yes  No:

*Yes. The most recent fiscal audit for year 2021 has been completed and the final audit report was electronically submitted to the Federal Audit Clearinghouse on September 28, 2022 as well as to HUD REAC on September 29, 2022.*

3. Were there any findings as the result of that audit?

Yes  No

4. If there were any findings, do any remain unresolved? If yes, how many unresolved findings remain?

Yes  No

*There was only one audit finding where Deloitte noted that the Authority did not complete all corrective actions to remediate environmental contaminants in the 2021 audit period and is in the process of addressing these issues. This finding remains unresolved. While this finding was first reported by the auditors in the 2021 Single Audit, it is not new information. In January 2019, the Authority entered into the HUD Agreement to address building conditions, including conditions related to lead-based paint, mold, pests, elevators, and heating. The HUD Agreement appointed a federal Monitor. It also required the promulgation of action plans around these health and safety issues and other items. These action plans are publicly available with other reports on health and safety issues, which detail the Authority's efforts to inspect for and correct deficiencies associated with environmental contaminants like lead-based paint and mold. The Authority plans to continue to work to address these health and safety issues, and to work towards meeting the multi-year obligations laid out in the HUD agreement in addition to the action plans. The latest in time obligation under the HUD Agreement is the Authority's obligation to abate 100% of the apartment units that contain lead-based paint, and the interior common areas that contain lead-based paint in the same building as those units, by January 31, 2039.*

5. Have responses to any unresolved findings been submitted to HUD? If not, when are they due (state below)?

Yes  No

## **12. Asset Management**

[24 CFR Part 903.7 (q)]

1. 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?

Yes  No

*Please see Attachment B on pages 91 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 168 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)

**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 began 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. In late 2021, in collaboration with HPD, NYCHA included West Brighton in the PACT Round 12 RFEI. Development teams submitting proposals to rehabilitate the West Brighton development are also required to include a proposal for constructing a new affordable, mixed-use development. Proposals are due in mid-2022.

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

**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 165<sup>th</sup> 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** – In consultation with residents and community stakeholders, NYCHA is planning 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.

**Campos Plaza II, Manhattan** – NYCHA intends to 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. 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.)

Yes  No

<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>FHA Repossessed Houses – Group V [Formerly Groups I, II, III, V, VI, VII, IX, &amp; X]</b> 1b. Development (project) number: <b>NY005012090</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <ul style="list-style-type: none"> <li>• <i>140 East 91<sup>st</sup> Street, Brooklyn, NY 11212, Total Units = 2 (1 One-Bedroom Unit and 1 Two-Bedroom Unit)</i></li> </ul>
3. Application status (select one) <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application <b>approved</b> , submitted, or planned for submission: <b>Fall 2020</b>

5. Number of units affected: 6
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>May 2006</b> b. <b>Actual</b> end date of activity: <b>June 2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. <b>Development name: Soundview Houses</b> 1b. <b>Development (project) number: NY005000710</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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) <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application <b>approved</b> , submitted, or planned for submission: <b>January 30, 2013</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2012</b> b. <b>Actual</b> end date of activity: <b>2020</b>
<b>Demolition/Disposition Activity Description</b>
1a. <b>Development name: East 173<sup>rd</sup> Street-Vyse Avenue Houses</b> 1b. <b>Development (project) number: NY005015300</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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) <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application <b>approved</b> , submitted, or planned for submission: <b>November 14, 2009</b>
5. Number of units affected: 0
6. Coverage of action (select one)

<input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>November 21, 2008</b> b. <b>Projected</b> end date of activity: <b>TBD</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Astoria Houses</b> 1b. Development (project) number: <b>NY005000260</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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 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.</i>
3. Application status (select one) <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application <b>approved</b> , submitted, or planned for submission: <b>August 28, 2014</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>Fall 2016</b> b. <b>Projected</b> end date of activity: <b>Fall 2026</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Holmes Towers</b> 1b. Development (project) number: <b>NY005011390</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <i>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.</i>
3. Application status (select one) <input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date original application approved, submitted, or <b>planned for submission</b> : <b>TBD</b>
5. Number of units affected: 0



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

<input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b> b. Projected end date of activity: <b>TBD</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Betances VI</b> 1b. Development (project) number: <b>NY005012110</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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) <input type="checkbox"/> Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date original application <b>approved</b> , submitted, or planned for submission: <b>2019</b>
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. <b>Actual</b> or projected start date of activity: <b>2016</b> b. <b>Actual</b> end date of activity: <b>2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Morrisania Air Rights</b> 1b. Development (project) number: <b>NY005012670</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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) <input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date original application approved, submitted, or <b>planned for submission</b> : <b>2020</b>
5. Number of units affected: 0 units
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b>

b. <b>Actual</b> end date of activity: <b>2020</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Sumner Houses</b> 1b. Development (project) number: <b>NY005010730</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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) <input type="checkbox"/> Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date original application approved, <b>submitted</b> , or planned for submission: <b>2020</b>
5. Number of units affected: 0 units
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b> b. <b>Actual</b> end date of activity: <b>June 2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Twin Parks West (Sites 1 &amp; 2)</b> 1b. Development (project) number: <b>NY005012270</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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) <input type="checkbox"/> Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date original application approved, <b>submitted</b> , or planned for submission: <b>2020</b>
5. Number of units affected: 0 units
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b> b. <b>Actual</b> end date of activity: <b>2020</b>
<b>Demolition/Disposition Activity Description</b>

1a. Development name: <b>Harborview Terrace Houses</b>
1b. Development (project) number: <b>NY005010220</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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) <input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date application approved, submitted, or <b>planned for submission</b> : <b>TBD</b>
5. Number of units affected: <b>0</b>
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b> b. <b>Projected</b> end date of activity: <b>TBD</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Bushwick II CDA (Group E)</b>
1b. Development (project) number: <b>NY005012470</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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) <input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date original application approved, submitted, or <b>planned for submission</b> : <b>2021</b>
5. Number of units affected: <b>0</b>
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b> b. <b>Projected</b> end date of activity: <b>2022</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Sotomayor Houses</b>
1b. Development (project) number: <b>NY005010670</b>
2. Activity type: <input type="checkbox"/> Demolition

<input checked="" type="checkbox"/> Disposition <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) <input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application																																
4. Date original application approved, submitted, or <b>planned for submission: 2020</b>																																
5. Number of units affected: 0																																
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development																																
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2017</b> b. <b>Actual</b> end date of activity: <b>June 2021</b>																																
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1a. Development name: <b>Ocean Bay Apartments (Oceanside)</b> 1b. Development (project) number: <b>NY005010980</b>																																
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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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3. Application status (select one) <input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application																																
4. Date application approved, submitted, or <b>planned for submission: TBD</b>																																
5. Number of units affected: 0																																
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development																																

<input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2003</b> b. <b>Projected</b> end date of activity: <b>TBD</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Dyckman Houses</b> 1b. Development (project) number: <b>NY005000410</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <i>Lease of an approximate 15,000 square foot parcel on Block 2216 Lot 1 with development rights for affordable housing development.</i>
3. Application status (select one) <input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date original application approved, submitted, or <b>planned for submission</b> : <b>TBD</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or <b>projected</b> start date of activity: <b>TBD</b> b. <b>Projected</b> end date of activity: <b>TBD</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Morris II Houses</b> 1b. Development (project) number: <b>NY005011020</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <i>Lease of an approximate 13,000 square foot parcel on Block 2902 Lot 36 with development rights for affordable housing development.</i>
3. Application status (select one) <input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date original application approved, submitted, or <b>planned for submission</b> : <b>TBD</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: 2019 b. <b>Projected</b> end date of activity: <b>TBD</b>

Demolition/Disposition Activity Description
1a. Development name: <b>Kingsborough Houses and Kingsborough Houses Extension</b> 1b. Development (project) number: <b>NY005010100</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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>
3. Application status (select one) <input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date original application approved, submitted, or <b>planned for submission: TBD</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: 2019 b. <b>Projected</b> end date of activity: <b>TBD</b>
Demolition/Disposition Activity Description
1a. Development name: <b>West Brighton II</b> 1b. Development (project) number: <b>NY005010130</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <i>Lease of a parcel on Block 196 Lot 1 with development rights for affordable housing development.</i>
3. Application status (select one) <input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date original application approved, submitted, or <b>planned for submission: TBD</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or <b>projected</b> start date of activity: <b>TBD</b> b. <b>Projected</b> end date of activity: <b>TBD</b>
Demolition/Disposition Activity Description
1a. Development name: <b>Manhattanville</b> 1b. Development (project) number: <b>NY005020810</b>

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



*Transfer of surplus development rights to an adjacent housing development site for a new residential building.*

3. Application status (select one)

- Approved  
 Submitted, pending approval  
 Planned application

4. Date 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: **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  
 Disposition

*Transfer of surplus development rights and potentially a small piece of land to an adjacent site for affordable housing development.*

3. Application status (select one)

- Approved  
 Submitted, pending approval  
 Planned application

4. Date application approved, submitted, or **planned for submission: 2021**

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: **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  
 Disposition

*Transfer of surplus development rights to an adjacent development site for mixed use development.*

3. Application status (select one) <input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date application approved, submitted, or <b>planned for submission: TBD</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>2020</b> b. <b>Projected</b> end date of activity: <b>2021</b>
<b>Demolition/Disposition Activity Description</b>
1a. Development name: <b>Boston Secor</b> 1b. Development (project) number: <b>NY005011380</b>
2. Activity type: <input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition <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) <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application <b>approved</b> , submitted, or planned for submission: <b>May 12, 2011</b>
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. <b>Actual</b> or projected start date of activity: <b>July 2010</b> b. <b>Projected</b> end date of activity: <b>2022</b>

**B) Conversion of Public Housing under the Voluntary or Mandatory Conversion programs**

[24 CFR Part 903.7 (j)]

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

1. 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?

Yes  No

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

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

As of September 1, 2022, there are 2,694 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.

AMP Number	Development Name	Total Units	Number of Units to be Converted to Section 8	Number of Units Converted by 9/1/22
NY005021870	AMSTERDAM ADDITION	175	26	26
NY005020920	BAY VIEW	1,610	340	340
NY005020860	BUSHWICK	1,220	209	209
NY005020800	CASTLE HILL	2,025	412	407
NY005021340	CHELSEA	425	68	68
NY005021110	DREW HAMILTON	1,217	276	278
NY005020810	MANHATTANVILLE	1,272	204	204
NY005020490	MARBLE HILL	1,682	258	257
NY005020830	MARLBORO	1,765	372	358
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
	<b>Total</b>	<b>14,476</b>	<b>2,723</b>	<b>2,694</b>

### **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. These properties, which represented the remaining unfunded developments in NYCHA's portfolio, were converted in 2021.

## C) Homeownership

[24 CFR Part 903.7 (k)]

### 1. Public Housing

1. 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.)

Yes  No

<b>Public Housing Homeownership Activity Description (Complete one for each development affected)</b>
1a. Development name: <b>FHA Repossessed Houses Group V [formerly Groups I through X]</b> 1b. Development (project) number: <b>NY005012090</b>
2. Federal Program authority: <input type="checkbox"/> HOPE I <input checked="" type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) <input checked="" type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program - <i>Section 5(h)</i> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program <b>approved</b> , submitted, or planned for submission: <b>9/11/2014</b>
5. Number of units affected: 51 6. Coverage of action: (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development <i>The original Section 5(h) Plan Amendment approved in 2007 included 184 occupied single-family units intended for sale to public housing residents. On September 11, 2014, HUD issued a final Section 5(h) Plan Amendment granting approval for the sale of 51 units to residents under the Section 5(h) Plan and mandating Plan termination after the sale of the 51 units. 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 March 1, 2022, NYCHA has executed 175 HAP contracts for 19,858 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 2022, NYCHA expects to utilize no more than 5% of the Consolidated Annual Contributions Contract (ACC) for Project Based contracts.<sup>1</sup>
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.

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<sup>1</sup> 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) Conversion of Public Housing under the Rental Assistance Demonstration (RAD) Program**

### **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, Section 18 and Part 200 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 Kraus Management, Inc. (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 now substantially completed.

### **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 New York LLC, Dabar Development Partners, and Bedford Stuyvesant Restoration Corporation (developer joint venture), Renewal Chateau LLC (general contractor), Reliant Realty Services LLC and Progressive Management of NY V LLC (property managers), and Bedford Stuyvesant Restoration Corporation (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 (developer & general contractor), Cornell Pace Inc. (property manager), and Community League of the Heights, Inc. (social services provider). Repairs began in 2020 and will be completed in late 2022 or 2023.

**PACT/RAD at Boulevard-BSA-FP**

This conversion will provide \$483 million for comprehensive repairs to 1,673 units across 29 buildings in Brooklyn. The selected development team comprises The Hudson Companies, Inc., Property Resources Corporation and Duvernay + Brooks LLC (developers), Broadway Builders LLC and Melcara Corp (general contractors), Property Resources Corporation and Lisa Management, Inc. (property managers), and CAMBA (social services providers). Repairs are expected to be completed in late 2023 or 2024.

**PACT/RAD at Linden-Penn**

This conversion will provide \$430 million for comprehensive repairs to 1,922 units across 25 buildings in Brooklyn. NYCHA entered into a public-private partnership with Douglaston Development, L+M Development Partners, Dantes Partners, and SMJ Development Corp (developers), L+M Builders Group and Levine Builders (general contractors), Clinton Management and C&C Apartment Management LLC (property managers), and University Settlement (social service providers). Repairs are expected to be completed in late 2023 or 2024.

**PACT/RAD at Williamsburg**

This conversion will provide \$493 million for comprehensive repairs to 1,621 units across 21 buildings in Brooklyn. The development team consists of RDC Development (developer), MDG Design + Construction LLC (general contractor), Wavecrest Management Group LLC (property manager), and St Nicks Alliance Corp and Grand Street Settlement (social services provider). Repairs are expected to be completed in late 2023 or 2024.

**PACT/RAD at Harlem River**

This conversion will provide \$236 million for comprehensive repairs to 693 units across 8 buildings in Manhattan. The development team comprises Settlement Housing Fund Inc and West Harlem Group Assistance (developers), L+M Builders Group (general contractor), C&C Apartment Management LLC (property manager), and Presbyterian Senior Services (social services provider). Repairs are expected to be completed in 2024.

**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 or land converting to Section 8 via Section 18 and/or Part 200.

<b>Name of Public Housing Development:</b> CLAREMONT REHAB (GROUP 2)	<b>PIC Development ID:</b> NY005013080	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 107	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$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		
<b>Name of Public Housing Development:</b> CLAREMONT REHAB (GROUP 3)	<b>PIC Development ID:</b> NY005013080	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance:</b> (if yes, please put the location if known, and # of units transferring) No
<b>Total Units:</b> 115	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> (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		
<b>Name of Public Housing Development:</b> CLAREMONT REHAB (GROUP 4)	<b>PIC Development ID:</b> NY005013080	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance:</b> (if yes, please put the location if known, and # of units transferring) No
<b>Total Units:</b> 150	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> (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		
<b>Name of Public Housing Development: CLAREMONT REHAB (GROUP 5)</b>	<b>PIC Development ID:</b> NY005013080	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 135</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 135 = \$482,876
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 135</b>	<b>Number of Units Post-Conversion 135</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	42	42	0
Two Bedroom	73	73	0
Three Bedroom	18	18	0
Four Bedroom	2	2	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: HARRISON AVENUE REHAB (GROUP A)</b>	<b>PIC Development ID:</b> NY005013410	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 34</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 34 = \$121,613
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 34</b>	<b>Number of Units Post-Conversion 34</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	13	13	0
Two Bedroom	15	15	0
Three Bedroom	6	6	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

<b>Name of Public Housing Development:</b> HARRISON AVENUE REHAB (GROUP B)	<b>PIC Development ID:</b> NY005013410	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 150	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 150 = \$536,529
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 150	<b>Number of Units Post-Conversion</b> 150	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	48	48	0
Two Bedroom	70	70	0
Three Bedroom	27	27	0
Four Bedroom	5	5	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> REHAB PROGRAM (WISE REHAB)	<b>PIC Development ID:</b> NY005011270	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 40	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 40 = \$143,074
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 40	<b>Number of Units Post-Conversion</b> 40	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> STEBBINS AVENUE-HEWITT PLACE	<b>PIC Development ID:</b> NY005013420	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No

<b>Total Units: 120</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521 /168,100 x 120 = \$429,223</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 120</b>	<b>Number of Units Post-Conversion 120</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	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		
<b>Name of Public Housing Development: UNION AVENUE-EAST 166TH STREET</b>	<b>PIC Development ID: NY005013420</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 120</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 120 = \$429,233</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 120</b>	<b>Number of Units Post-Conversion 120</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	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		
<b>Name of Public Housing Development: WEST FARMS SQUARE CONVENTIONAL</b>	<b>PIC Development ID: NY005015310</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 20</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 20 = \$71,537</b>

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	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> WSUR (BROWNSTONES)	<b>PIC Development ID:</b> NY005011270	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance:</b> (if yes, please put the location if known, and # of units transferring) No
<b>Total Units:</b> 236	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$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		
<b>Name of Public Housing Development:</b> HOE AVENUE-EAST 173 <sup>RD</sup> STREET	<b>PIC Development ID:</b> NY005015300	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance:</b> (if yes, please put the location if known, and # of units transferring) No
<b>Total Units:</b> 65	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> (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		
<b>Name of Public Housing Development: BRYANT AVENUE-EAST 174<sup>TH</sup> STREET</b>			
<b>Total Units: 72</b>	<b>PIC Development ID: NY005015300</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 72 = \$257,534</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 72</b>	<b>Number of Units Post-Conversion 72</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	14	14	0
One Bedroom	24	24	0
Two Bedroom	22	22	0
Three Bedroom	12	12	0
Four Bedroom	0	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		
<b>Name of Public Housing Development: EAST 173<sup>RD</sup> STREET-VYSE AVENUE</b>			
<b>Total Units: 168</b>	<b>PIC Development ID: NY005015300</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521 /168,100 x 168 = \$600,913</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 168</b>	<b>Number of Units Post-Conversion 168</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		



<b>Name of Public Housing Development:</b> 1010 EAST 178 <sup>TH</sup> STREET	<b>PIC Development ID:</b> NY005011330	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 220	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 220 = \$786,910
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 220	<b>Number of Units Post-Conversion</b> 220	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
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		
<b>Name of Public Housing Development:</b> EAST 165 <sup>TH</sup> STREET-BRYANT AVENUE	<b>PIC Development ID:</b> NY005015300	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 111	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 111 = \$397,032
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b> 111	<b>Number of Units Post-Conversion</b> 111	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development:</b> HUNTS POINT AVENUE REHAB	<b>PIC Development ID:</b> NY005015300	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No

<b>Total Units: 131</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 131 = \$468,569
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 131</b>	<b>Number of Units Post-Conversion 131</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	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		
<b>Name of Public Housing Development: LONGFELLOW AVENUE REHAB</b>	<b>PIC Development ID: NY005015300</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 75</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 75 = \$268,265
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 75</b>	<b>Number of Units Post-Conversion 75</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
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		
<b>Name of Public Housing Development: WEST FARMS ROAD REHAB</b>	<b>PIC Development ID: NY005015300</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 208</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100

			x 208 = \$743,987
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 208</b>	<b>Number of Units Post-Conversion 208</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	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		
<b>Name of Public Housing Development: 1471 WATSON AVENUE</b>	<b>PIC Development ID: NY005010670</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 96</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 96 = \$343,379</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion 96</b>	<b>Number of Units Post-Conversion 96</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
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		
<b>Name of Public Housing Development: BOYNTON AVENUE REHAB</b>	<b>PIC Development ID: NY005010320</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 82</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 82 = \$293,303</b>

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		
<b>Name of Public Housing Development: AUDUBON</b>	<b>PIC Development ID: NY005010030</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 168</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 168 = \$600,913</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 168</b>	<b>Number of Units Post-Conversion: 168</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	5	5	0
One Bedroom	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		
<b>Name of Public Housing Development: BETHUNE GARDENS</b>	<b>PIC Development ID: NY005010030</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 210</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 210 = \$751,141</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 210</b>	<b>Number of Units Post-Conversion: 210</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
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		
<b>Name of Public Housing Development: MARSHALL PLAZA</b>	<b>PIC Development ID:</b> NY005010030	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 180</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Senior	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 180 = \$643,835
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 180	<b>Number of Units Post-Conversion:</b> 180	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development: 104-14 TAPSCOTT STREET</b>	<b>PIC Development ID:</b> NY005011670	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 30</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 30 = \$107,306
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 30	<b>Number of Units Post-Conversion:</b> 30	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		

Assistance):			
<b>Name of Public Housing Development:</b> FENIMORE-LEFFERTS	<b>PIC Development ID:</b> NY005011670	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 36	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 36 = \$128,767
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 36	<b>Number of Units Post-Conversion:</b> 36	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development:</b> LENOX ROAD-ROCKAWAY PARKWAY	<b>PIC Development ID:</b> NY005011670	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 74	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 74 = \$264,688
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 74	<b>Number of Units Post-Conversion:</b> 74	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		

<b>Name of Public Housing Development:</b> RALPH AVENUE REHAB	<b>PIC Development ID:</b> NY005011670	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 118	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 118 = \$422,070
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 118	<b>Number of Units Post-Conversion:</b> 118	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development:</b> REID APARTMENTS	<b>PIC Development ID:</b> NY005011670	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 230	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Senior	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 230 = \$822,678
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 230	<b>Number of Units Post-Conversion:</b> 230	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
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		

<b>Name of Public Housing Development:</b> RUTLAND TOWERS	<b>PIC Development ID:</b> NY005011670	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 61	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 61 = \$218,189
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 61	<b>Number of Units Post-Conversion:</b> 61	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	5	5	0
One Bedroom	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		
<b>Name of Public Housing Development:</b> SUTTER AVENUE-UNION STREET	<b>PIC Development ID:</b> NY005011670	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 100	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 100 = \$357,686
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 100	<b>Number of Units Post-Conversion:</b> 100	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development:</b> TAPSCOTT STREET REHAB	<b>PIC Development ID:</b> NY005011670	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No



<b>Total Units: 155</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 155 = \$554,414</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 155</b>	<b>Number of Units Post-Conversion: 155</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	<b>0</b>
One Bedroom	<b>46</b>	<b>46</b>	<b>0</b>
Two Bedroom	<b>77</b>	<b>77</b>	<b>0</b>
Three Bedroom	<b>28</b>	<b>28</b>	<b>0</b>
Four Bedroom	<b>4</b>	<b>4</b>	<b>0</b>
Five Bedroom	<b>0</b>	<b>0</b>	<b>0</b>
Six Bedroom	<b>0</b>	<b>0</b>	<b>0</b>
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: CROWN HEIGHTS</b>	<b>PIC Development ID: NY005013510</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 121</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 121 = \$432,800</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 121</b>	<b>Number of Units Post-Conversion: 121</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	<b>0</b>
One Bedroom	<b>31</b>	<b>31</b>	<b>0</b>
Two Bedroom	<b>78</b>	<b>78</b>	<b>0</b>
Three Bedroom	<b>10</b>	<b>10</b>	<b>0</b>
Four Bedroom	<b>2</b>	<b>2</b>	<b>0</b>
Five Bedroom	<b>0</b>	<b>0</b>	<b>0</b>
Six Bedroom	<b>0</b>	<b>0</b>	<b>0</b>
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: HOWARD AVENUE</b>	<b>PIC Development ID: NY005013510</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 150</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100</b>

			x 150 = \$536,529
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 150</b>	<b>Number of Units Post-Conversion: 150</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development: HOWARD AVENUE-PARK PLACE</b>	<b>PIC Development ID: NY005013510</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 156</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 156 = \$557,990</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 156</b>	<b>Number of Units Post-Conversion: 156</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development: OCEAN HILL-BROWNSVILLE</b>	<b>PIC Development ID: NY005013510</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 125</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 125 = \$447,108</b>

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		
<b>Name of Public Housing Development: PARK ROCK REHAB</b>	<b>PIC Development ID:</b> NY005013510	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 134</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$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		
<b>Name of Public Housing Development: STERLING PLACE REHABS (SAINT JOHNS-STERLING)</b>	<b>PIC Development ID:</b> NY005013510	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 83</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$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		
<b>Name of Public Housing Development: STERLING PLACE REHABS (STERLING-BUFFALO)</b>			
<b>PIC Development ID:</b> NY005013510	<b>Conversion type (i.e., PBV or PBRA):</b> PBV		<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 125	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 125 = \$447,108
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 125	<b>Number of Units Post-Conversion:</b> 125	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development: SAMUEL (CITY)</b>			
<b>PIC Development ID:</b> NY005023770	<b>Conversion type (i.e., PBV or PBRA):</b> PBV		<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 664	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 664 = \$2,375,036
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 664	<b>Number of Units Post-Conversion:</b> 664	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
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		

<b>Name of Public Housing Development:</b> 1162-1176 WASHINGTON AVENUE	<b>PIC Development ID:</b> NY005013080	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 66	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 66 = \$236,073
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 66	<b>Number of Units Post-Conversion:</b> 66	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
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		
<b>Name of Public Housing Development:</b> COLLEGE AVENUE-EAST 165TH STREET	<b>PIC Development ID:</b> NY005013080	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 95	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Senior	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 95 = \$339,802
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 95	<b>Number of Units Post-Conversion:</b> 95	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
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		
<b>Name of Public Housing Development:</b> TELLER AVENUE-EAST 166 <sup>TH</sup> STREET	<b>PIC Development ID:</b> NY005013080	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No

<b>Total Units: 90</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 90 = \$321,918</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 90</b>	<b>Number of Units Post-Conversion: 90</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>18</b>	<b>18</b>	0
One Bedroom	<b>33</b>	<b>33</b>	0
Two Bedroom	<b>23</b>	<b>23</b>	0
Three Bedroom	<b>16</b>	<b>16</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: CLAREMONT PARKWAY-FRANKLIN AVENUE</b>	<b>PIC Development ID: NY005013420</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 188</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Partially Senior</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 188 = \$672,450</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 188</b>	<b>Number of Units Post-Conversion: 188</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>132</b>	<b>132</b>	0
Two Bedroom	<b>37</b>	<b>37</b>	0
Three Bedroom	<b>19</b>	<b>19</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: DAVIDSON</b>	<b>PIC Development ID: NY005013420</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>

<b>Total Units: 175</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Partially Senior</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 175 = \$625,951</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 175</b>	<b>Number of Units Post-Conversion: 175</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>14</b>	<b>14</b>	0
One Bedroom	<b>42</b>	<b>42</b>	0
Two Bedroom	<b>26</b>	<b>26</b>	0
Three Bedroom	<b>66</b>	<b>66</b>	0
Four Bedroom	<b>23</b>	<b>23</b>	0
Five Bedroom	<b>4</b>	<b>4</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: SOUTH BRONX AREA (SITE 402)</b>	<b>PIC Development ID: NY005013420</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 114</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 114 = \$407,762</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 114</b>	<b>Number of Units Post-Conversion: 114</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>0</b>	<b>0</b>	0
Two Bedroom	<b>36</b>	<b>36</b>	0
Three Bedroom	<b>66</b>	<b>66</b>	0
Four Bedroom	<b>12</b>	<b>12</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: UNION AVENUE-EAST 163RD STREET</b>	<b>PIC Development ID: NY005013420</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 200</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 200 = \$715,372</b>

<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 200</b>	<b>Number of Units Post-Conversion: 200</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development: EAGLE AVENUE-EAST 163RD STREET</b>	<b>PIC Development ID: NY005000590</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 66</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 66 = \$236,073</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 66</b>	<b>Number of Units Post-Conversion: 66</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	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		
<b>Name of Public Housing Development: EDENWALD</b>	<b>PIC Development ID: NY005000570</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 2039</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 2039 = \$7,293,222</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 2039</b>	<b>Number of Units Post-Conversion: 2039</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development: OCEAN HILL APARTMENTS</b>	<b>PIC Development ID:</b> NY005011620	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 238</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 238 = \$851,293
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 418	<b>Number of Units Post-Conversion:</b> 418	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development: SARATOGA VILLAGE</b>	<b>PIC Development ID:</b> NY005011620	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 125</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 125 = \$447,108
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 125	<b>Number of Units Post-Conversion:</b> 125	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
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		

<b>Name of Public Housing Development:</b> STUYVESANT GARDENS I	<b>PIC Development ID:</b> NY005012210	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 331	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 331 = \$1,183,941
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 331	<b>Number of Units Post-Conversion:</b> 331	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	2	2	0
Two Bedroom	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		
<b>Name of Public Housing Development:</b> STUYVESANT GARDENS II	<b>PIC Development ID:</b> NY005012210	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 150	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Senior	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 150 = \$536,529
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 150	<b>Number of Units Post-Conversion:</b> 150	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development:</b> BEDFORD-STUYVESANT REHAB	<b>PIC Development ID:</b> NY005010730	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No

<b>Total Units: 85</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 85 = \$304,033</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 85</b>	<b>Number of Units Post-Conversion: 85</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>30</b>	<b>30</b>	0
Two Bedroom	<b>32</b>	<b>32</b>	0
Three Bedroom	<b>14</b>	<b>14</b>	0
Four Bedroom	<b>9</b>	<b>9</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: METRO NORTH PLAZA</b>	<b>PIC Development ID: NY005010090</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 275</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 275= \$983,637</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 275</b>	<b>Number of Units Post-Conversion: 275</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>82</b>	<b>82</b>	0
Two Bedroom	<b>80</b>	<b>80</b>	0
Three Bedroom	<b>78</b>	<b>78</b>	0
Four Bedroom	<b>20</b>	<b>20</b>	0
Five Bedroom	<b>15</b>	<b>15</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: WHITE</b>	<b>PIC Development ID: NY005010090</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 248</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b>

			\$601,270,521/168,100 x 248 = \$887,062
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 248</b>	<b>Number of Units Post-Conversion: 248</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>128</b>	<b>128</b>	0
One Bedroom	<b>119</b>	<b>119</b>	0
Two Bedroom	<b>0</b>	<b>0</b>	0
Three Bedroom	<b>1</b>	<b>1</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: WILSON</b>	<b>PIC Development ID: NY005010090</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 398</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 398 = \$1,423,591</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 398</b>	<b>Number of Units Post-Conversion: 398</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>0</b>	<b>0</b>	0
Two Bedroom	<b>38</b>	<b>38</b>	0
Three Bedroom	<b>304</b>	<b>304</b>	0
Four Bedroom	<b>38</b>	<b>38</b>	0
Five Bedroom	<b>18</b>	<b>18</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: CLASON POINT GARDENS</b>	<b>PIC Development ID: NY005012800</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 401</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b>

			\$601,270,521/168,100 x 401 = \$1,434,322
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 401</b>	<b>Number of Units Post-Conversion: 401</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	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		
<b>Name of Public Housing Development: SACK WERN</b>	<b>PIC Development ID: NY005012800</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 413</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 413 = \$1,477,244</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 413</b>	<b>Number of Units Post-Conversion: 413</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
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		
<b>Name of Public Housing Development: CHELSEA</b>	<b>PIC Development ID: NY005021340</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 425</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b>

			\$601,270,521/168,100 x 425 = \$1,520,166
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 425</b>	<b>Number of Units Post-Conversion: 425</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>23</b>	<b>23</b>	0
One Bedroom	<b>140</b>	<b>140</b>	0
Two Bedroom	<b>120</b>	<b>120</b>	0
Three Bedroom	<b>99</b>	<b>99</b>	0
Four Bedroom	<b>40</b>	<b>40</b>	0
Five Bedroom	<b>3</b>	<b>3</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: CHELSEA ADDITION</b>			
<b>PIC Development ID:</b>	NY005011340	<b>Conversion type (i.e., PBV or PBRA):</b>	PBV
<b>Transfer of Assistance:</b>	(if yes, please put the location if known, and # of units transferring) No		
<b>Total Units:</b>	96	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b>	Senior
<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	Senior		
<b>Capital Fund allocation of Development:</b>	(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 96 = \$343,379		
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 96</b>	<b>Number of Units Post-Conversion: 96</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>96</b>	<b>96</b>	0
Two Bedroom	<b>0</b>	<b>0</b>	0
Three Bedroom	<b>0</b>	<b>0</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: ELLIOTT</b>			
<b>PIC Development ID:</b>	NY005011340	<b>Conversion type (i.e., PBV or PBRA):</b>	PBV
<b>Transfer of Assistance:</b>	(if yes, please put the location if known, and # of units transferring) No		
<b>Total Units:</b>	608	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b>	Family
<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b>	Family		
<b>Capital Fund allocation of Development:</b>	(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 608 = \$2,174,732		

<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 608</b>	<b>Number of Units Post-Conversion: 608</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	21	21	0
One Bedroom	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		
<b>Name of Public Housing Development: FULTON</b>			
<b>Total Units: 944</b>	<b>PIC Development ID: NY005001360</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 944 = \$3,376,558
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 944</b>	<b>Number of Units Post-Conversion: 944</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
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		
<b>Name of Public Housing Development: BOSTON SECOR</b>			
<b>Total Units: 538</b>	<b>PIC Development ID: NY005011380</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 538 = \$1,924,352

<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 535</b>	<b>Number of Units Post-Conversion: 535</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	5	5	0
One Bedroom	177	177	0
Two Bedroom	173	173	0
Three Bedroom	114	114	0
Four Bedroom	61	61	0
Five Bedroom	5	5	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: BOSTON ROAD PLAZA</b>	<b>PIC Development ID: NY005010390</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 235</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 235 = \$840,563</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 233</b>	<b>Number of Units Post-Conversion: 233</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	38	38	0
One Bedroom	155	155	0
Two Bedroom	40	40	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		
<b>Name of Public Housing Development: MIDDLETOWN PLAZA</b>	<b>PIC Development ID: NY005010340</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 179</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 179 = \$640,258</b>



<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 177</b>	<b>Number of Units Post-Conversion: 177</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	27	27	0
One Bedroom	140	140	0
Two Bedroom	10	10	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		
<b>Name of Public Housing Development: 131 SAINT MICHOLOS AVENUE</b>	<b>PIC Development ID: NY005010970</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 100</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 100 = \$357,686</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 98</b>	<b>Number of Units Post-Conversion: 98</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	20	20	0
One Bedroom	31	31	0
Two Bedroom	31	31	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		
<b>Name of Public Housing Development: CORSI HOUSES</b>	<b>PIC Development ID: NY005010640</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 171</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 171 = \$616,643</b>

<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 171</b>	<b>Number of Units Post-Conversion: 171</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	86	86	0
One Bedroom	85	85	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		
<b>Name of Public Housing Development: MORRIS PARK SENIOR CITIZENS HOME</b>			
<b>Total Units: 97</b>	<b>PIC Development ID: NY005012410</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 97 = \$346,956</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 97</b>	<b>Number of Units Post-Conversion: 97</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	52	52	
One Bedroom	36	36	
Two Bedroom	9	9	
Three Bedroom	0	0	
Four Bedroom	0	0	
Five Bedroom	0	0	
Six Bedroom	0	0	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: REHAB PROGRAM (TAFT REHABS)</b>			
<b>Total Units: 156</b>	<b>PIC Development ID: NY005013170</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 156 = \$557,990</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 156</b>	<b>Number of Units Post-Conversion: 156</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis</b>

			<b>Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>13</b>	<b>13</b>	0
One Bedroom	<b>74</b>	<b>74</b>	0
Two Bedroom	<b>69</b>	<b>69</b>	0
Three Bedroom	<b>0</b>	<b>0</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: ROBINSON</b>			
<b>PIC Development ID:</b>	NY005012410	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 189	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 189 = \$676,027
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 188	<b>Number of Units Post-Conversion:</b> 188	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>18</b>	<b>18</b>	0
One Bedroom	<b>56</b>	<b>56</b>	0
Two Bedroom	<b>54</b>	<b>54</b>	0
Three Bedroom	<b>42</b>	<b>42</b>	0
Four Bedroom	<b>16</b>	<b>16</b>	0
Five Bedroom	<b>2</b>	<b>2</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: UPACA (SITE 5)</b>			
<b>PIC Development ID:</b>	NY005012410	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 200	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Senior	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 200 = \$715,372
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 180	<b>Number of Units Post-Conversion:</b> 180	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>

			<b>Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>180</b>	<b>180</b>	0
Two Bedroom	<b>0</b>	<b>0</b>	0
Three Bedroom	<b>0</b>	<b>0</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: UPACA (SITE 6)</b>			
<b>PIC Development ID:</b> NY005012410	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No	
<b>Total Units:</b> 150	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Senior	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 150 = \$536,529
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 150	<b>Number of Units Post-Conversion:</b> 150	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>150</b>	<b>150</b>	0
Two Bedroom	<b>0</b>	<b>0</b>	0
Three Bedroom	<b>0</b>	<b>0</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: MANHATTANVILLE</b>			
<b>PIC Development ID:</b> NY005020810	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No	
<b>Total Units:</b> 1,272	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 1,272 = \$4,549,769
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 1,271	<b>Number of Units Post-Conversion:</b> 1,271	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>

			<b>Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>38</b>	<b>38</b>	0
One Bedroom	<b>209</b>	<b>209</b>	0
Two Bedroom	<b>558</b>	<b>558</b>	0
Three Bedroom	<b>378</b>	<b>378</b>	0
Four Bedroom	<b>76</b>	<b>76</b>	0
Five Bedroom	<b>12</b>	<b>12</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: BAILEY AVENUE-WEST 193RD STREET</b>	<b>PIC Development ID: NY005012020</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 233</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 233 = \$833,409</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 233</b>	<b>Number of Units Post-Conversion: 233</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>19</b>	<b>19</b>	0
One Bedroom	<b>80</b>	<b>80</b>	0
Two Bedroom	<b>95</b>	<b>95</b>	0
Three Bedroom	<b>28</b>	<b>28</b>	0
Four Bedroom	<b>11</b>	<b>11</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: WEST TREMONT AVENUE- SEDGWICK AVENUE AREA</b>	<b>PIC Development ID: NY005010450</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Total Units: 148</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Senior</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Senior</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 148= \$529,376</b>
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion: 146</b>	<b>Number of Units Post-Conversion: 146</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis</b>

			<b>Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>32</b>	<b>32</b>	0
One Bedroom	<b>114</b>	<b>114</b>	0
Two Bedroom	<b>0</b>	<b>0</b>	0
Three Bedroom	<b>0</b>	<b>0</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: EAST 180TH STREET-MONTEREY AVENUE</b>			
<b>PIC Development ID:</b> NY005012270	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No	
<b>Total Units:</b> 239	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 239 = \$854,870
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 239	<b>Number of Units Post-Conversion:</b> 239	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>18</b>	<b>18</b>	0
One Bedroom	<b>70</b>	<b>70</b>	0
Two Bedroom	<b>81</b>	<b>81</b>	0
Three Bedroom	<b>59</b>	<b>59</b>	0
Four Bedroom	<b>9</b>	<b>9</b>	0
Five Bedroom	<b>2</b>	<b>2</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: FORT INDEPENDENCE STREET-HEATH AVENUE</b>			
<b>PIC Development ID:</b> NY005012020	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No	
<b>Total Units:</b> 344	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 344 = \$1,230,441
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 341	<b>Number of Units Post-Conversion:</b> 341	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>

			<b>Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>17</b>	<b>17</b>	0
One Bedroom	<b>103</b>	<b>103</b>	0
Two Bedroom	<b>140</b>	<b>140</b>	0
Three Bedroom	<b>55</b>	<b>55</b>	0
Four Bedroom	<b>26</b>	<b>26</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: TWIN PARKS EAST (SITE 9)</b>			
<b>PIC Development ID:</b> NY005012270	<b>Conversion type (i.e., PBV or PBRA):</b> PBV		<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 219	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Senior	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 219 = \$783,333
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 218	<b>Number of Units Post-Conversion:</b> 218	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>77</b>	<b>77</b>	0
One Bedroom	<b>141</b>	<b>141</b>	0
Two Bedroom	<b>0</b>	<b>0</b>	0
Three Bedroom	<b>0</b>	<b>0</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: UNIVERSITY AVENUE REHAB</b>			
<b>PIC Development ID:</b> NY005013410	<b>Conversion type (i.e., PBV or PBRA):</b> PBV		<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 230	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 230 = \$822,678
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 230	<b>Number of Units Post-Conversion:</b> 230	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>

			<b>Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>66</b>	<b>66</b>	0
Two Bedroom	<b>108</b>	<b>108</b>	0
Three Bedroom	<b>47</b>	<b>47</b>	0
Four Bedroom	<b>9</b>	<b>9</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: EASTCHESTER GARDENS</b>			
<b>PIC Development ID:</b> NY005010340	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No	
<b>Total Units:</b> 877	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 877 = \$3,136,908
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 876	<b>Number of Units Post-Conversion:</b> 876	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>87</b>	<b>87</b>	0
Two Bedroom	<b>399</b>	<b>399</b>	0
Three Bedroom	<b>390</b>	<b>390</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: EAST 152ND STREET-COURTLANDT AVENUE</b>			
<b>PIC Development ID:</b> NY005010280	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No	
<b>Total Units:</b> 221	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 221 = \$790,487
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 221	<b>Number of Units Post-Conversion:</b> 221	<b>Change in Number of Units per Bedroom Type and Why (De Minimis</b>



			<b>Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>26</b>	<b>26</b>	0
One Bedroom	<b>91</b>	<b>91</b>	0
Two Bedroom	<b>59</b>	<b>59</b>	0
Three Bedroom	<b>31</b>	<b>31</b>	0
Four Bedroom	<b>11</b>	<b>11</b>	0
Five Bedroom	<b>3</b>	<b>3</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: MOORE</b>			
<b>Total Units: 463</b>	<b>PIC Development ID: NY005010930</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Bedroom Type</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 463 = \$1,656,087</b>
	<b>Number of Units Pre-Conversion: 461</b>	<b>Number of Units Post-Conversion: 461</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>155</b>	<b>155</b>	0
Two Bedroom	<b>112</b>	<b>112</b>	0
Three Bedroom	<b>154</b>	<b>154</b>	0
Four Bedroom	<b>37</b>	<b>37</b>	0
Five Bedroom	<b>3</b>	<b>3</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: RANGEL</b>			
<b>Total Units: 984</b>	<b>PIC Development ID: NY005000370</b>	<b>Conversion type (i.e., PBV or PBRA): PBV</b>	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) No</b>
<b>Bedroom Type</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.): Family</b>	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.): Family</b>	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$601,270,521/168,100 x 984 = \$3,519,632</b>
	<b>Number of Units Pre-Conversion: 982</b>	<b>Number of Units Post-Conversion: 982</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>

			<b>Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>93</b>	<b>93</b>	0
Two Bedroom	<b>699</b>	<b>699</b>	0
Three Bedroom	<b>190</b>	<b>190</b>	0
Four Bedroom	<b>0</b>	<b>0</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: WEST BRIGHTON I</b>			
<b>PIC Development ID:</b> NY005010130	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No	
<b>Total Units:</b> 490	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 490 = \$1,752,662
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 489	<b>Number of Units Post-Conversion:</b> 489	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	<b>0</b>	<b>0</b>	0
One Bedroom	<b>97</b>	<b>97</b>	0
Two Bedroom	<b>183</b>	<b>183</b>	0
Three Bedroom	<b>174</b>	<b>174</b>	0
Four Bedroom	<b>35</b>	<b>35</b>	0
Five Bedroom	<b>0</b>	<b>0</b>	0
Six Bedroom	<b>0</b>	<b>0</b>	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: WEST BRIGHTON II</b>			
<b>PIC Development ID:</b> NY005010130	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No	
<b>Total Units:</b> 144	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Senior	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 144 = \$515,068
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 120	<b>Number of Units Post-Conversion:</b> 84	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>

			Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	38	2	0
One Bedroom	82	82	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		
<b>Name of Public Housing Development: CAMPOS PLAZA II</b>	<b>PIC Development ID:</b> NY005012570	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 224	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Senior	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Senior	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$601,270,521/168,100 x 224 = \$801,217
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion:</b> 224	<b>Number of Units Post-Conversion:</b> 224	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	0	0	0
One Bedroom	32	32	0
Two Bedroom	96	96	0
Three Bedroom	80	80	0
Four Bedroom	16	16	0
Five Bedroom	0	0	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 Statute<sup>2</sup>, at conversion, current households cannot be excluded from occupancy at the Covered Project<sup>3</sup> based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project<sup>4</sup> will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.<sup>5</sup> Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, Section 8(o)(4) of the Act<sup>6</sup> 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.
- 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

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<sup>2</sup> RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Pub. L. No. 112-55, approved November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Pub. L. No. 113-76, approved January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Pub. L. No. 113-235, approved December 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.”

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

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

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

<sup>6</sup> The U.S. Housing Act of 1937 as may be amended.

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 the RAD Fair Housing, Civil Rights, and Relocation Notice.<sup>7</sup> 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](http://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

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<sup>7</sup> Please see Attachment 0 beginning on page 217 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](https://www.hud.gov/sites/documents/16-17HSGN_16-17PIHN.PDF).

implement these provisions see the RAD Fair Housing, Civil Rights, and Relocation Notice.

- 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<sup>8</sup> 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 TTP<sup>9</sup>

Five Year Phase in:

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<sup>8</sup> The term Project Owner refers to the owner of the Covered Project, including but not limited to any owner pursuant to a HAP Contract. For purposes of HAP Contracts, an Owner is a private person, partnership, or entity (including a cooperative), a non-profit entity, a PHA, or other public entity, having the legal right to lease or sublease the dwelling units subject to the HAP Contract

<sup>9</sup> For example, where a resident's most recently paid TTP is \$100, but the Calculated PBV TTP is \$200 and remains \$200 for the period of the resident's occupancy, (i.e. no changes in income) the resident would continue to pay the same rent and utilities for which it was responsible prior to conversion. At the first recertification following conversion, the resident's contribution would increase by 33% of \$100 to \$133. At the second AR, the resident's contribution would increase by 50% of the \$66 differential to the standard TPP, increasing to \$166. At the third AR, the resident's contribution would increase to \$200 and the resident would continue to pay the Calculated PBV TTP for the duration of their tenancy.

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications – Full Calculated PBV TTP

*Please Note:* In either the three year phase-in or the five-year phase-in, once the Calculated PBV TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies must also implement a three or five-year phase-in for impacted residents, but may alter the terms above as long as it establishes a written policy setting forth the alternative terms. 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.<sup>10</sup> Further, upon conversion to PBV, if the PHA no longer has a public housing program, funds already escrowed for FSS participants

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<sup>10</sup> The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

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.<sup>11</sup>

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;

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<sup>11</sup> Where the PHA maintains a public housing program, any forfeited funds that had been escrowed prior to conversion would revert to the PHA's Operating Reserves.



- b. Not less than 14 days in the case of nonpayment of rent; and
  - c. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
- ii. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For 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)-(v), 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)-(v), 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)-(v).
- 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 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.<sup>12</sup> In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC. 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.11 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.

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<sup>12</sup> For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

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 for current residents remaining or returning to the Covered Project. 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).<sup>13</sup>

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

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<sup>13</sup> For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant-based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing an alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD.

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

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

### **I – Temporary Move Plans**

If a resident must be temporarily moved due to personal medical reasons, health and safety reasons (for example, due to necessary environmental abatement), and/or reasonable accommodation, the temporary move will be performed at no expense to the resident and the resident will have the right to return after the rehabilitation to their original unit. The resident will be offered a temporary unit at a development within the same PACT project. Specific temporary move plans will be finalized after a PACT 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 217 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 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 such existing agreements or consent decrees.

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

NYCHA submitted the FY 2022 Plan to HUD on April 11, 2022. The Plan was approved by HUD in EPIC on May 10, 2022.

*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](mailto: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.

<b>Housing Needs of Families in the Jurisdiction by Family Type</b>							
Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% of AMI	962,265	5	5	4	1	3	4
Income >30% but <=50% of AMI	482,933	5	5	4	1	3	4
Income >50% but <80% of AMI	562,078	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
<b>Race/Ethnicity*</b>							
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

*\*Due to the effects of the pandemic on the 2020 ACS data collection, quality, and release, the Department of City Planning (DCP) used last year’s data (2015-2019) to estimate the population by race and ethnicity. As a result, the total households and demographic profile are identical to last year.*

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.

<b>Housing Needs of Families on the PHA’s Waiting Lists – Public Housing (As of 9/26/22)</b>			
Waiting list type: (select one)			
<input type="checkbox"/>	Section 8 tenant-based assistance		
<input checked="" type="checkbox"/>	Public Housing		
<input type="checkbox"/>	Combined Section 8 and Public Housing		
<input type="checkbox"/>	Public Housing Site-Based or sub-jurisdictional waiting list (optional)		
If used, identify which development/sub jurisdiction:			
	# of Families	% of Total Families	Annual Turnover <sup>14</sup>
Waiting list total	282,711		2.3%
Extremely low income <=30% AMI	233,451	83%	
Very low income (>30% but <=50% AMI)	41,204	15%	
Low income (>50% but <=80% AMI)	8,054	3%	
Income Not Reported	2	0%	
Families with children	110,381	39%	
Elderly families	56,953	20%	
Families with Disabilities <sup>15</sup>	47,989	17%	
<b>Race/Ethnicity</b>			
White	16,462	6%	
Black	55,003	19%	
Hispanic	122,767	43%	
Asian	24,042	9%	
Native American	2,581	1%	
Native Hawaiian	786	0%	
Other	61,070	22%	
<b>Characteristics by Bedroom Size</b>			
0 BR	129,147	46%	
1BR	44,249	16%	
2 BR	86,745	31%	
3 BR	18,313	6%	
4 BR	4,171	1%	
5+ BR	83	0%	
Data Not Available	3	0%	

<sup>14</sup> Figure represents turnover (move-outs from Public Housing) during 2021.

<sup>15</sup> “Disabled” indicates a person, regardless of age, who falls within the definition of “disability” contained in §233 of the Social Security Act.

**Housing Needs of Families on the PHA's Waiting Lists – Public Housing  
(As of 4/21/22)**

Is the waiting list closed (select one)?

No  Yes

If yes, how long as it been closed (# of months)?

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

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

**Housing Needs of Families on the PHA's Waiting Lists – Section 8 (As of 9/26/2022)**

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:

	<b># of Families</b>	<b>% of Total Families</b>	<b>Annual Turnover</b>
Waiting list total <sup>16</sup>	18,162		55.42% (2021)
Extremely low income <=30% AMI	15,429	85.0%	
Very low income (>30% but <=50% AMI)	1,485	8.2%	
Low income (>50% but <=80% AMI)	133	0.7%	
Income Not Reported	1,115	6.1%	
Families with Children	5,364	29.5%	
Elderly Families	5,945	32.7%	
Families with Disabilities <sup>17</sup>	4,629	25.5%	
<b>Race/Ethnicity</b>			
White	1,828	10.1%	
Black	4,507	24.8%	
Hispanic	9,881	54.4%	
Asian	438	2.4%	
Native American	116	0.6%	
Native Hawaiian	24	0.1%	
Other	1,368	7.5%	
<b>Characteristics by Bedroom Size</b>			
0 BR	8,024	44.2%	
1 BR	4,856	26.7%	
2 BR	4,104	22.6%	
3 BR	879	4.8%	
4+BR	195	1.1%	
5+ BR	81	0.4%	
Data Not Available	23	0.1%	

<sup>16</sup> Waiting list total includes both *extremely low-income* (below 30 percent of Area Median Income) and *very low-income* (30 percent to 50 percent of Area Median Income) families.

<sup>17</sup> "Disabled" indicates a person, regardless of age, who falls within the definition of "disability" contained in §233 of the Social Security Act.

## Housing Needs of Families on the PHA's Waiting Lists – Section 8 (As of 9/26/2022)

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 and 2022 to accept referrals for homeless referrals, participating FUP Youth whose assistance is expiring, Victim of Domestic Violence/Intimidated Witness - referred by prosecutorial or law enforcement agency, and Public Housing referrals.*

If yes, how long has it been closed (# of months)? 184 Months as of September 30, 2022

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 2021 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, 2022, 717 maintenance workers (70% of all maintenance workers) have been trained to conduct visual assessments to identify lead-based paint hazards. It should be noted that all visual assessments are performed by Healthy Homes Lead Hazard Control through vendors or trained in-house staff, not NYCHA maintenance workers. Pursuant to the Initial Lead Action Plan, NYCHA now conducts two visual assessments per year in child under 6 apartments and one visual assessment per year in non-child under 6 apartments with known or presumed lead-based paint.*

**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 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.*

NYCHA published a dashboard online that reports the progress of the XRF testing, which is available at: <https://my.nycha.info/PublicSite/Transparency/XrfReport>.

As of September 30, 2022, 108,230 apartments were tested using XRF technology at the 1.0 mg/cm<sup>2</sup> standard. Due to a change in the City's standard, NYCHA is now retesting units at the new, lowered threshold of 0.5 mg/cm<sup>2</sup> and is prioritizing the testing of child under 6 units. NYCHA also suspended its testing of units at the old standard. As of September 30, 2022, LHCD has attempted 25,386 units and completed testing in 23,511 units at the new standard.

**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, and the abatement requirements are being achieved through that program. Williamsburg Houses converted in December 2021 and abatement has been ongoing since January 2022. Harlem River Houses converted in February 2022. PACT partners for Harlem River Houses and Williamsburg Houses also began abatement via removal at the City's new standard of 0.5 mg/cm<sup>2</sup> in 2022. These are the Early Abatement Developments specified in the Agreement and abatement requires building-by-building relocation. Hundreds of units have been abated at both sites, and reporting on NYCHA's field monitoring efforts and the PACT partners' progress is included in the Lead Compliance Assurance Plan reports provided to the federal government.

**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. Abatement is also performed in vacant units upon move-out and is included in the scope of work for all PACT projects.

In the last year, NYCHA has procured a program management firm that will run point on abating units using the two HUD grants and the \$771.8 million in City Capital funds. The first phase of the program includes the expedited abatement of Child Under 6 units that test positive at the City's new standard of 0.5 mg/cm<sup>2</sup>. NYCHA began abating these units in 2022



at Bronx River Houses and completed abatements in child under six (CU6) apartments where residents agreed to relocate. NYCHA is currently working at Wagner where over 75 CU6 apartments have been abated. The next development will be Jefferson, followed by Red Hook East and West.

## **Heat**

### **Goal: Improving the Provision of Heat**

**Objective:** NYCHA will comply with N.Y.C. Admin. Code § 27-2029(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, HUD, and the Southern District of New York (SDNY) to analyze existing work order data and 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:** *NYCHA has met and surpassed this goal. 48 developments are online as of October, 2022. NYCHA has an additional 12 developments in construction. 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. NYCHA has submitted an Energy Performance Contract (EPC) to HUD for approval for 3 developments. It is currently under review by HUD.*

## 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>. NYCHA will be updating the plans in the future to reflect changes in assets.*

**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 2021-2022 heat season, NYCHA resolved its heat outages in 8.3 hours. 97.8% of outages were resolved within 24 hours. One outage lasted over 48 hours. NYCHA continues to utilize 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 2<sup>nd</sup>, 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. NYCHA also reviews the causes of outages to identify system components that may require extensive repair and or replacement. We then use this data to develop an operational investment strategy where we use operating dollars to make the identified repairs.*

## 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 82 new boilers at 22 developments. At another 55 developments, NYCHA has ongoing, active projects to replace another 264 boilers by the end of 2026, totaling 346 boilers. These projects are funded through a range of sources including City capital dollars (including funds allocated pursuant to the City Capital Action Plan), State capital dollars, Sandy Recovery and Resilience funding, and federal capital funds, among others.
  - In addition, NYCHA has addressed 200 boilers through the Permanent Affordability Commitment Together (PACT) housing preservation initiative

## **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 September 2022, 88% of units and 93% of common area complaints did not have a second verified complaint.

*In order to address performance parameters related to reducing mold recurrence and limiting the square footage of new mold complaints, NYCHA continues to train staff in the Mold Busters process for mold inspections, remediation, and related repairs. Training progress is captured in the section below. In addition, NYCHA is currently working to revise the Mold Standard Procedure (the document upon which the Mold Busters training is based), which was last updated in February 2020. NYCHA aims to publish the revised Mold SP in 2023. Notable planned updates to the Mold Standard Procedure reflect new and already implemented IT enhancements. The updates include but are not limited to: a new list of non-capital root causes (in December 2021, these new root causes were added to the iWM app and Maximo), an updated approved material list for mold cleaning, encapsulation and mold resistant paint, and the addition of the craft of maintenance workers to the list of titles able to perform mold inspection.*

- 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 September 2022, 87% of verified mold complaints in units and 80% of mold complaints 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 September 2022, there were 63 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 September 2022 (cumulative), NYCHA printed the written plan within five business days for 53% of verified mold complaints.

*In order to improve performance related to this metric, OMAR has launched two major initiatives. First, as of September 2022, NYCHA is in the process of adding maintenance workers (MWs) to the list of titles who can conduct mold inspections to reduce the open mold inspection backlog and time to inspect. OMAR ran the MW mold inspection pilot from September 2021 through May 2022 and kicked off its agency-wide rollout in September 2022. This rollout will continue through 2023.*

*Second, as part of the OMAR Mold Inspection Initiative, OMAR deployed a team of inspectors to perform mold inspections at Enhanced Oversight Program sites. This initiative started in January 2022 at Jackson and Morrisania Air Rights and is ongoing. As of September 2022, OMAR's Mold Inspection Initiative has resulted in the closure of 1,037 work orders.*

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 September 2022 (cumulative), 17% of simple mold repairs were completed within 7 days and 2 % of complex repairs were completed within 15 days.

*In order to improve performance related to this metric, NYCHA introduced an IT enhancement allowing Caretakers X to remove up to 20 square feet of mold at non-lead based paint developments in June 2021 and introduced a number of initiatives from 2019 through 2022. These initiatives are summarized below.*

***The Mold and Leak Scorecard and Dashboard*** was launched in May 2022 in partnership with the Baez Independent Data Analyst and is ongoing. The Mold and Leak Scorecard and Dashboard is a tracking tool ranking each NYCHA consolidation on its mold and leak work order performance. The Scorecard tracks 11 key mold and leak metrics correlating to the compliance requirements outlined in the Baez and HUD agreements. The Scorecard builds visibility across multiple NYCHA owners and stakeholders and allows NYCHA to pinpoint where consolidations are trending negatively and deploy programs such as: the Enhanced Oversight Program (described below), crash teams of mold inspectors and cleaners, vendor mobilization to address open Tub Enclosure work orders and in-person outreach events to increase awareness of OMAR's Mold Response Unit and Ombudsperson Call Center.

***The Enhanced Oversight Program (EOP)*** was launched in June 2022 and is ongoing. EOP was designed to help identify and remove roadblocks to mold and leak compliance, and, where necessary, direct additional resources to ensure mold and leak work orders are dealt with as quickly as possible. All six Round 1 EOP<sup>18</sup> sites improved in terms of rank and weighted average score. Key trends across all sites showed a decrease in the median days to inspect, a decrease in the percentage of skilled trade work orders over 100 days, and an increase in the percentage of Mold Busters 2.0 QA inspections that are 45-day compliant.

***Operation Mold Cleanup (OMC)*** was launched in May 2022 and is ongoing. OMC is an effort by NYCHA Operations to prioritize and reduce the backlog of open Caretaker X and Painter mold removal work orders and outstanding mold resistant paint work orders. As of September 2022, 47% (or 9,254 of 19,633) of the work orders identified for prioritization by OMC have been closed.

***The Mold Cleaning Initiative (MCI)*** was launched in May 2022 and is ongoing. To execute MCI, OMAR deployed a group of seasonal employees to assist NYCHA development staff in addressing their mold cleaning backlogs. This program includes mold cleaning work orders assigned to Caretaker X staff and Painters. As of September 2022, 1,032 work orders were completed under MCI.

***The Building Line Initiative (BLI)*** was launched in June 2022 at Red Hook East and is ongoing. The BLI is a comprehensive plumbing and renovation project that aims to address mold and leaks by targeting their underlying root cause(s) and developing a full scope of work for the affected apartment line to complete the necessary repairs. As part of BLI, NYCHA is currently working to finish plumbing renovations impacting six apartments and hopes to relocate residents back to their units by end of 2022.

**The Mold and Leak Prioritization (MLP) Interdepartmental Effort** was launched in January 2021 and ended in February 2022. The goal of MLP was to reduce the mold work order backlog on an expedited schedule through a unified effort across NYCHA. As of February 2022, NYCHA had closed 24,181 (70%) of the 34,713 child mold work orders identified in January 2021 to be targeted by MLP.

**Long-term Pending (LTP) Work Order Initiative Phase 1 and Phase 2** were led by OMAR in collaboration with Operations to address work orders open for 200+ days as of September 2019 (Phase 1) and February 2020 (Phase 2). Phase 1 began in September 2019 and Phase 2 was launched in February 2020. As of April 14, 2022, NYCHA has closed 17,949 work orders (95%) of the 18,844 work orders identified during both phases of the LTP Initiative.

- 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 September 2022 (cumulative), 67 % 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"), NYCHA has introduced two mandatory inspection questions to assist inspectors to better evaluate and report conditions in the unit: (1) "Is there flooding condition?" and (2) "Is there standing water?".

The Leak SP Pilot 2.0 was launched in December 2021 and is currently taking place 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's Mold Busters training includes customized hands-on training to ensure NYCHA staff have the tools for the effective and efficient identification and remediation of mold's root causes. Continuous training of existing and future staff in the Mold Busters process ensures knowledge continuity so that NYCHA continues to address mold's root causes during remediation efforts.

NYCHA closed the initial Mold Busters training program in December 2019 after training 2,870 (99%) of the 2,900 staff. Mold Busters training was put on hold due to COVID-19, until the vendor, Environmental Education Associates (EAA) could implement partially virtual training. Due to attrition rates and other hiring at the Authority, the Mold Busters training was restarted in 2020 for newly hired staff. The training resumed in September 2020 and as of September 2022, 1,515 additional employees received one or more of the following trainings:

- *Mold: Inspection course*
- *Mold: Building Science - Inspector course*
- *Mold: Building Science - Maintenance Workers course*
- *Mold: Remediation Methods course*

*The Mold Busters training is given to all new eligible NYCHA staff (newly hired or promoted) as well as anyone flagged by NYCHA’s Compliance Department to be retrained. The training represents a mix of online and in-person learning. As of September 2022, there were 443 employees pending the Mold Busters training as indicated in the chart below.*

**Mold Busters Training Update**

<b>Mold Courses</b>	<b>Employees Trained Sept. 2020 to Sept. 2022</b>	<b>Employees Pending Training as of Sept. 2022</b>
<i>Remediation Methods</i>	851	291
<i>Inspection</i>	160	37
<i>BS for Inspector</i>	154	48
<i>BS for Maintenance Workers</i>	3350	67
<b>Total:</b>	<b>1,515</b>	<b>443</b>

*In addition, NYCHA offers Mold Busters Refresher training. This training is for staff for whom two years have passed since their initial training. Refresher training consists of 4-hour virtual inspection course and 4-hour in-person remediation course.*

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

- **Progress:** *In 2020, NYCHA launched and completed its Mold Busters Resident informational campaign and completed its rollout of the Ombudsperson Call Center (OCC). Both these initiatives were aimed at improving communication and notification to tenants regarding mold issues.*

*The Mold Busters Resident informational campaign included the development of targeted outreach and collateral materials including short videos and window clings that were shared with locations without mechanical ventilation.*

*Since the OCC’s rollout, NYCHA’s MRU has supported the OCC by using various engagement platforms to raise awareness of the OCC to NYCHA residents and by facilitating the resolution of resident mold and leak complaints made to the OCC. MRU manages everything from simple, missed appointment complaints to complex complaints requiring substantial repair activity, multiple appointments, or relocation.*

*The MRU and NYCHA Operations, along with the support of the independent, court-appointed Ombudsperson Call Center (OCC), has assisted over 10,000 NYCHA residents with mold or leak related complaints and monitored the completion of 64,327 work orders as of September 2022. OMAR’s Mold Response Unit (MRU)*

*proactively works to ensure all OCC complaints are resolved to the resident's satisfaction.*

*In June and July 2022, as part of the Enhanced Oversight Program, OMAR's Mold Response Unit (MRU), NYCHA Operations and NYCHA's Resident Participation and Civic Engagement Department collaborated with the Ombudsperson Call Center (OCC) to assist NYCHA developments with outdoor blitz events at Howard Houses, Unity Plaza and Red Hook West Houses. Additionally, in August 2022, MRU attended multiple family days at Sumner, Unity, St. Mary's Park, and Wilson Houses. At both the blitzes and family days, MRU representatives engaged residents and provided reading materials on ways to reduce mold in apartments. OMAR inspectors also participated in these events to inspect resident units with severe issues.*

*Finally, NYCHA's Resident Participation and Civic Engagement Department has also proactively engaged with residents. In 2021, the Resident Engagement Department conducted outreach to various developments that were engaged in the Tenant Associations election process. During that time, they engaged a total of 21 residents with the mold booklet and collected information for follow up with development staff.*

**Objective:** Continue and accelerate roof repairs:

- a) By 2019, replace 96 additional roofs, benefitting 24,000 residents.
- **Progress:** *As of September 2022, 241 roofs have been replaced, benefitting over 63,000 residents. 40 additional roof replacements will be completed by December 31, 2022.*

## **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 undergoing additional enhancements for more accurate reporting. ESRD continues to invest in air conditioners, as well as upgrade to water resistant door operators and currently utilizing dashboard data in reassigning staff to focus on preventive maintenance to reduce outages. As of September 2022, 123 Water Resistant Operators have been installed so far.*

**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 mentioned above, NYCHA is in process of revising its Elevator Dashboard. From January 1 to August, 2022, there were 10,787 no service conditions with an average duration time of 4.6 hours. Only 221 no-service conditions exceeded 18 hours, meaning 99.9% of no-service conditions were resolved within 18 hours.
- In addition to hiring additional staff to reduce the duration of service outages, ESRD is exploring Electric Voltage Regulators (EVR) to increase voltage during summer months. This equipment will help prevent no service conditions in senior buildings as when the local utility company lowers voltage. In addition, the Elevator Department has asked NYCHA's Capital Projects to include EVRs on all future modernizations. ESRD is also exploring shift changes as we fill all the vacancies to increase response times and allow more preventive maintenance after normal business 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 September 2022, construction work for two elevators at Boston Road Plaza have been completed and both cars are in service. Construction phase activities have started for 201 elevators at eleven 11 developments. Ninety-five elevators are currently in design or procurement, the construction of which are slated to start in the last quarter of 2022 or first quarter of 2023. Construction is planned to start in 2023

at an additional one development to replace 30 elevators. Through NYCHA's capital plan, 298 elevators are now 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:** *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 worked to confirm how work order data, combined with inspection results, could be utilized to set an accurate pest baseline. Another set of 2,000 inspections were re-started as part of the NPII Program in February 2022 and were completed in April 2022, four days ahead of the scheduled completion date. The results of these inspections will now be integrated with the prior effort to set an accurate baseline and begin reporting progress. Once that baseline is determined, NYCHA will track reductions in its pest population using that baseline. NYCHA will inspect another 2,000 apartments in 2023.*

### **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 2022, 42% of rat complaints were responded to within two business days and 53% within 5 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 2022, 20% of other pest complaints were responded to within seven days and 27% 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

- **Progress:** *NYCHA developed a dashboard to track progress toward the above metrics. This dashboard was substantially completed in April 2021. As of August 2022, from the time an exterminator confirms the infestation to treatment, is done in less than 7 days 96% of the time. 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.*

- 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:** *In August 2020, NYCHA 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, they have a reasonable accommodation because of a respiratory issue, or they mention an issue to the Customer Contact Center (CCC) representative when creating a pest work order, 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. In 2021, NYCHA implemented a protocol that if an exterminator treated a high roach infestation, a medium or high mouse infestation or any level of rat or bedbug infestation work orders would be created for apartments above, below, and side to side, to schedule, inspect and treat if needed.*

**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:** *In January 2021, NYCHA launched a new Integrated Pest Management standard procedure across the portfolio that sets new standards for pest management and it was updated on September 19, 2022 with additional protocols dealing with vacuuming, adjacent apartments, and supplies.*

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

- **Progress:** *NYCHA trained extermination staff on Integrated Pest Management (IPM) in 2021 and will have another training in October 2022. In addition to formal classroom training, Pest Control supervisors shadow two staff members a week for one-on-one training which is also tracked.*

**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 begun a Garbage Truck Pilot in Brooklyn. As part of the pilot, NYCHA purchased two 6-yard rear-loading garbage trucks to supplement DSNY collections with Waste Department collections for use at six developments (listed below) on non-DSNY collection days resulting in these developments having the benefit of curbside garbage collection either 5 days or six days a week.*
  - *Unity Plaza*
  - *Park Rock Consolidated*
  - *Reid Apartments*
  - *Garvey*
  - *Ocean Hill*
  - *Low Houses*

*The program has been highly successful, resulting in much cleaner conditions on the grounds, sidewalks and streets at these developments. The Waste Management Department hopes to expand this program by purchase or lease of additional dump trucks of varying sizes, with a view towards dramatically reducing the amount of unsecured garbage sitting curbside for an unreasonable period of time as well as having these trucks for special cleanups throughout the Housing Authority.*

*Additionally, NYCHA is using City Capital Action Plan funds to replace most interior and exterior compactors that are past their useful life. These funds provide for the replacement and room restoration of 1,600 interior compactors and the redesign of up to 194 waste yards. These changes will provide significant improvements in equipment and working conditions for NYCHA staff to handle waste and recyclables. Changes to Alternative Work Schedule schedules have also improved NYCHA staff's ability to handle waste and recyclables. The schedule changes ensure the development will have a sufficient level of staff at the property to complete necessary work daily and evenly throughout the week. In 2022, NYCHA is looked forward to kicking off two Design-Build contracts for re-envisioned waste infrastructure, expanding access to on-site composting, and launching a demonstration project on containerizing curbside refuse and recyclables. As of September 2022, NYCHA is awaiting registration of Design Build contract 1 to redesign waste yards at 7 locations. On Design Build contract 2 for a pneumatic waste collection system at Polo Grounds Towers, the notice to proceed was issued on 6/30/22. The design and resident engagement are underway. NYCHA is launching a demonstration project on containerizing curbside refuse and recyclables. The request for proposal (RFP) for trucks and containers was released on 9/23 and responses are expected by 11/4/22.*

### **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.
  - **Progress:** *In February 2022, NYCHA reached its goal of 8,000 door sweeps.*
- b) NYCHA will install 50 rat slabs by December 31, 2020.
  - **Progress:** *33 rat slabs have been installed as of September 2022. The contractor has resumed work after COVID-19-related pauses, and work is expected to be done for all 50 slabs by May 2023.*
- c) NYCHA will dedicate at least 20 full-time exterminator staff to conduct ongoing, comprehensive, preventative maintenance treatments in public spaces for developments within the Rat Mitigation Zone (RMZ).
  - **Progress:** *As of May 2022, Pest Control has hired 26 exterminators to focus on rats on grounds and basements in the RMZ. The RMZ are 101 developments identified through a*

*partnership with DOHMH as having the highest rat population within NYCHA's portfolio. Nine of the 26 exterminators are from the Resident Economic Empowerment & Sustainability (REES) program for exterminators.*

d) NYCHA will install exterior bulk crushers or retrofit exterior compactors with auger bulk crushers at 10 developments by December 31, 2022.

- **Progress:** *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 March 31, 2024.*

### **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. As of September 26, 2022, NYCHA has completed 76% of its annual inspections.*

**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 trained Maintenance Workers on the new Standard Procedure. As of September 26, 2022, a total of 13,304 apartment inspections had minor repairs performed.*

**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:*

## **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 September 29, 2022, 3,687 employees had completed the Initial Renovator RRP Training (8 hours) and 3,734 completed the RRP onsite training. NYCHA has also rolled out a 3-hour RRP refresher training and a virtual training on the Lead Disclosure Rule in 2022. As of September 29, 2022, 1,590 employees have completed the 3-Hour RRP refresher training and 976 employees have completed the virtual Lead Disclosure Rule Training.

As mandated by the HUD Agreement, the Compliance Department helps manage 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 was folded into the next 3-day training, which started in 2022. As of September 29, 2022, 2,150 employees have taken 3-day training under the new cohort. Phase 2 Training for approximately 3,000 other employees (primarily Caretakers) started in February 2021. As of September 29, 2022, a total number of 3,353 Caretakers are required to take the training. As of September 29, 2022, 2,925 or 87.23% of all Caretakers have completed the training.

The Compliance Department has also helped coordinate efforts to ensure (1) NYCHA's exterminators receive the requisite certifications from the Department of Environmental Conservation; (2) NYCHA's plumbers are certified as "gas qualified" under Local Law 150 of

2016; and (3) NYCHA's elevator personnel meet the new licensing requirements issued by the Department of Buildings in 2021, among other items.

### **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 15,000 units have converted to Section 8 and more than \$3.40 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 \$2.8 billion in major upgrades under construction at approximately 12,200 apartments that are home to more than 33,000 New Yorkers.*

*PACT Partners have been designated for another transaction that is expected to close in 2022, comprising approximately 550 units. An additional 19,000 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 and resident leaders selected partners at 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). Due to COVID-19, the HireNYCHA launch has been delayed and its budget goals have been modified.

- **Progress:** In 2020 and 2021, under the HireNYCHA program, NYCHA offered construction certification trainings (OSHA 30, Site Safety Training) in partnership with CUNY and SCSC Group. In total 78 residents enrolled/slots offered and 40 completed. These certifications are required to work at most NYC construction sites.
- Additionally in 2021 NYCHA conducted resident outreach and assessment resulting in fifty-five (55) residents passing the first application steps for vocational training. Residents engaged were connected to training opportunities like the NYCHA Resident Training Academy (NRTA). NYCHA has also partnered with Building Skills New York to provide construction related certification training and employment assistance for fifteen (15) NYCHA residents. As of August 2022, BSNY has provided nine (9) residents with needed construction certification trainings, connecting all nine (9) to employment opportunities at training completion. The first construction vocational training cohort under HireNYCHA is scheduled to start September 2022

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

- **Progress:** In April 2022, NYCHA began implementation of a new, industry standard software to improve Section 3 compliance tracking. The initial, phased rollout targets select contractors. Additional functionality to capture all Section 3 activity will be added and introduced to all NYCHA contractors in 2023. On April 21, 2022, an interim memo was issued to NYCHA staff detailing how staff and contractors should use existing forms to report out on Section 3 benchmarks. The revised Section 3 Standard Procedure is expected to be finalized in early 2023. In August and September 2022, NYCHA conducted training for staff on the new rule, forms, and procedures. In October 2022, NYCHA will conduct outreach to contractors with active contracts subject to the new Section 3 rule to remind them of their responsibility to report labor hours and other Section 3 activity to NYCHA.

**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 business across 6 cohorts.

- *In 2020, NYCHA in partnership with SBS launched Catering Business Pathways as many of the participants were solely focused on catering services. The first cohort had 24 resident graduates and completed in March 2020 right before the pandemic shutdown. Due to lack of funding, there were no new training cohorts for the Food, Catering and Childcare Business Pathways in 2021. In 2021, NYCHA partnered with SBS to provide business development workshops for Business Pathways alumni. This consisted of workshops for Childcare businesses on financial management, increasing customers; and for Food/Catering businesses on building a brand, securing capital. Additionally, an 8 session Business Pathways Refresher Bootcamp was held during November and December 2021 to provided alumni with a refresher on basic entrepreneurial skills.*

*In Fall 2021, NYCHA launched the first cohort of Construction Business Pathways (CoBP) for NYCHA public housing and Section 8 residents interested in starting or growing a business in one of the construction trades. This initiative is funded by Chase through the Fund for Public Housing. As part of this initiative, NYCHA collaborated with SBS to coordinate no-cost OSHA 30 and Site Safety Training for Construction Business Pathways cohort 1 program participants in need of this certification. The first CoBP cohort ended in December 2021 with 20 residents. NYCHA will begin the second cohort of CoBP in Fall 2022 and will continue to partner with SBS on OSHA 30 and Site Safety Training.*

*Lastly, NYCHA and SBS 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 December 2021, there were 5 cohorts (one of which one was funded by a NYCHA contractor) and additional NYCHA led shorter test prep classes that have resulted in over 40 NYCHA residents passing the Local 3 exam. NYCHA will continue to provide shorter test prep classes directly to graduates of the NYCHA Resident Training Academy (NRTA) who are interested in applying for the IBEW apprenticeship program.*

#### **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. Eleven meetings were held in 2021 and eleven are scheduled for 2022 (with nine held as of September 2022). Over 100 NYCHA staff attend the monthly meetings.*

#### **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 2021 SPD responded to, or assisted with, 366 reasonable accommodation matters from residents, applicants, Section 8 voucher holders, and/or their respective advocates. In 2021, SPD handled approximately 3,135 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 no visits due to COVID and SPD provided information to a variety of organizations, including New York Legal Services, ADAPT, 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 2021.

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 2021, DEO reviewed 41 new fair housing matters and 22 had basis for investigation. DEO closed 39 fair housing complaints with 20 having basis for investigation in 2021. Due to COVID-19 office restrictions, DEO's Office of Employment & Fair Housing Investigations ("OEFHI") team conducted intakes and interviews remotely with video and teleconferencing.

Complaint Basis	2021
Sexual Harassment	8
Race	4
Multi-Basis	2
National Origin	2
Religion	2
Disability	1
Gender	1
Gender Identity	0
Other	0
Sexual Orientation	0
Total	20

*In 2021, 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).*

*NYCHA's Language Assistance Services Standard Procedure, updated most-recently on February 7, 2019, provides procedures and staff responsibilities to ensure NYCHA's language access policy is achieved. Specifically, the standard procedure addresses, among other things: procedures for identifying LEP individuals with the assistance of language identification cards; staff procedures and supervisor responsibilities for obtaining translation or interpretation services for LEP individuals; the posting of notices in public areas within Development Management Offices, Borough Offices and waiting rooms informing LEP individuals of no-cost language access services; training requirements to ensure awareness of and compliance with NYCHA's language access procedures; language access reporting and oversight responsibilities; and a requirement that NYCHA's language access policies be reviewed every three years.*

### **Access Resources**

*NYCHA's Language Access Coordinator and the Language Services Unit oversees NYCHA's language access policies. The LSU team is currently staffed by five full-time interpreters (one Spanish language interpreter, two Chinese language interpreters fluent in both Mandarin and Cantonese, and two Russian language interpreters), as well as one temporary Spanish and Chinese language interpreters. In addition to providing translation and interpretation services, the LSU serves as a resource for staff in understanding and applying NYCHA's language access procedures, coordinates requests from NYCHA departments for written translation and interpretation services, manages vendors providing language services and tracks language access metrics.*

*NYCHA relies on staff and vendors to provide language services including telephonic, remote meeting and in-person interpretation as well as paper, webpage or other electronic*

*document translations. In providing these services, NYCHA staff serve in one of three primary functions. First, bilingual staff may directly serve LEP individuals they or their departmental colleague's encounter. Second, staff may participate in NYCHA's Language Bank of volunteer interpreters and translators. Finally, departments that frequently encounter LEP individuals, including the Customer Contact Center, Department of Equal Opportunity, Office of Impartial Hearings, Operations, Public Housing Property Management, Leased Housing's Section 8 program, and Resident Economic Empowerment & Sustainability and Resident Engagement, assign a staff member to serve as the department language liaison. Liaisons serve as language access ambassadors for their department as well as identify vital documents requiring translation.*

*To supplement staff resources, NYCHA's language access vendors provide interpretation services as well as primary document translation and secondary quality assurance review. Through NYCHA staff and vendors, language services are available in well over 100 languages.*

*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 2021, LSU handled 412 interpretation requests and 2,745 translations requests comprising of 7,439 pages. This year (as of March 2022), LSU has handled 71 interpretation requests and 729 translations requests comprising of 1,563 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**

*As of December 2021, MyNYCHA app has 106,134 registered users in English and 4,409 registered users in Spanish. In 2022, MyNYCHA app is being enhanced to include Russian and Chinese language options. NYCHA residents have used the MyNYCHA mobile app and website to file more than 2.2 million tickets since its inception in 2015.*

## **NYCHA Self-Service Portal**

*In 2021, the Self-Service portal received 6,763 requests for Spanish, 2,531 for Chinese Simplified, 756 for Russian and 524 for Chinese Traditional. Since the launch of the Self-Service Portal in 2016, 400,271 public housing residents and Section 8 voucher holders have used the portal for important tenancy related processes.*

### ***“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, 2021, through December 31, 2021, the following cases were approved for transfer:*

<i>VAWA Victim of Domestic Violence</i>	<i>1069</i>
<i>VAWA Dating Violence</i>	<i>211</i>
<i>VAWA Sexual Assault (includes Child Sexual Victims)</i>	<i>48</i>
<i>VAWA Stalking</i>	<i>206</i>
<i>Intimidated Victim</i>	<i>408</i>
<i>Intimidated Witness</i>	<i>20</i>
<i>Victim of Traumatic Incident</i>	<i>12</i>
<b>Total:</b>	<b>1974</b>

## **2. SIGNIFICANT AMENDMENT AND SUBSTANTIAL DEVIATION OR MODIFICATION OF THE AGENCY PLAN**

### **Criteria for Significant Amendment or Modification of the Agency Plan and/or Capital Fund Program Five-Year Action Plan:**

NYCHA will amend or modify its agency plan and/or Capital Fund Program Five-Year Action Plan upon the occurrence of any of the following events during the term of an approved plan(s):

1. A change in federal law takes effect and, in the opinion of NYCHA, it creates substantial obligations or administrative burdens beyond the programs then under administration, excluding changes made necessary due to insufficient revenue, funding or appropriations, funding reallocations resulting from modifications made to the annual or five-year capital plan or due to the terms of a judicial decree.
2. Any proposed demolition, disposition, homeownership, Capital Fund financing, development or mixed-finance proposals.
3. Any Capital Fund project not already in the Five-Year Action Plan for an amount greater than \$500 million excluding projects arising out of federally declared major disasters.
4. Any other event that the Authority determines to be a significant amendment or modification of an approved annual plan and/or Capital Fund Program Five-Year Action Plan.
5. For purposes of any Rental Assistance Demonstration (“RAD”) project, a proposed conversion of public housing units to Project Based Rental Assistance or Project Based Voucher Assistance that has not been included in an Annual Plan shall be considered a substantial deviation.

### 3. OTHER INFORMATION

[24 CFR Part 903.7 9 (r)]

#### A. Resident Advisory Board Recommendations

1. Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?

Yes  No:

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)

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 the Reid and Park Rock Consolidated PACT/RAD project, which received a CHAP from the Office of Recapitalization on January 11, 2022.

###### **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 has obligated all grants 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 the Reid and Park Rock Consolidated PACT/RAD project, which received a CHAP from the Office of Recapitalization on January 11, 2022.

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 2023 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 2023 Annual Plan to comply with HUD's requirement.

Although 16 of NYCHA's qualifying 124 consolidated developments fall outside of an Established Income Range ("EIR"), NYCHA is exempt from developing an additional Deconcentration Plan to bring the 16 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 March 1, 2022. This database contains household-level data for every occupied unit within NYCHA developments.

Of the 157,334 occupied units<sup>19</sup>, there are 131,328 units within 124 consolidated developments<sup>20</sup> that do not meet the exemption criteria and therefore, were used in this analysis.

Gross mean incomes from the excluded types of developments and units were not used in the calculation of the overall NYCHA mean. In total, 26,006 occupied units were excluded from the analysis. See the Appendix for a list of the individual excluded developments.

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<sup>19</sup> There are 157,334 public housing households as of March 1, 2022.

<sup>20</sup> For the purposes of this analysis, there are 124 consolidated developments that have units that are not exempt from the application of the Deconcentration Rule. However, there may be units within these 124 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 income<sup>21</sup> is less than 85% of the NYCHA mean; and a development will be considered above the EIR if its mean gross household income is above 115% of the NYCHA mean. The 2022 NYCHA mean gross household income is \$24,906, resulting in a lower EIR limit of \$21,170 and an upper EIR limit of \$28,642. 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 2022 HUD Area Median Income for the New York City HUD FMR Area (HMFA – includes the five boroughs and Putnam County) is \$28,350. However, this is less than 115% of the NYCHA mean gross household income, and therefore, NYCHA’s 2022 upper EIR limit remains at \$28,642.

Table I shows that out of the 124 consolidated NYCHA developments that are not exempt from the application of the Deconcentration Rule, there are 3 developments with 3,196 occupied units with gross mean household incomes below the EIR and 13 developments with 9,866 occupied units with gross mean household incomes above the EIR.

**TABLE I  
Summary Table**

Development Category	LOWER INCOME DEVELOPMENTS MEAN INCOMES <\$21,170		HIGHER INCOME DEVELOPMENTS MEAN INCOMES >\$28,642		TOTAL	
	Developments	Occupied Dwelling Units	Developments	Occupied Dwelling Units	Developments	Occupied Dwelling Units
Non-exempt NYCHA Developments	3	3,196	13	9,866	124	131,328

**TABLE II  
LOWER INCOME DEVELOPMENTS**

Table II lists the 3 consolidated developments with a mean gross household income of less than 85 percent (\$21,170) of the NYCHA mean of \$24,906.

Development Name	TDS #	Borough	Mean Gross Income	Occupied Dwelling Units
East River	009	Manhattan	\$20,521	1,103
Mill Brook	084	Bronx	\$20,066	1,331
Sedgwick	045	Bronx	\$20,994	762
<b>Total</b>			<b>\$20,446</b>	<b>3,196</b>

<sup>21</sup> Mean gross household income is defined as total household income before deductions.

The table above only includes units within the consolidated developments that qualify for inclusion in the Deconcentration Analysis, i.e., it excludes units that are elderly-only, mixed-finance, FHA, Hope VI, or MHOP.

**TABLE III  
HIGHER INCOME DEVELOPMENTS**

Table III lists the 13 consolidated developments with a mean gross household income greater than 115 percent (\$28,642) of the NYCHA mean of \$24,906.

<b>Development Name</b>	<b>TDS #</b>	<b>Borough</b>	<b>Mean Gross Income</b>	<b>Occupied Dwelling Units</b>
Building Management Associates (Private-BX 1)	530	Bronx	\$29,587	608
Fulton	136	Manhattan	\$32,301	929
Garvey	252	Brooklyn	\$29,337	308
La Guardia	076	Manhattan	\$28,979	1,319
Lafayette	122	Brooklyn	\$29,429	863
Ocean Hill Apartments	162	Brooklyn	\$33,821	355
Park Rock Consolidated	351	Brooklyn	\$29,852	784
Reid Apartments	167	Brooklyn	\$29,020	365
Riis	018	Manhattan	\$28,723	1,741
Sack Wern	280	Bronx	\$29,659	794
Stuyvesant Gardens I	221	Brooklyn	\$29,253	327
Unity Plaza	261	Brooklyn	\$30,215	819
Wilson	112	Manhattan	\$29,071	654
<b>Total</b>			<b>\$29,752</b>	<b>9,866</b>

The table above only includes units within the consolidated developments that qualify for inclusion in the Deconcentration Analysis, i.e., it excludes units that are elderly-only, mixed-finance, FHA, Hope VI, or MHOP.

Step 4 of the Deconcentration Requirement is an “option to provide reasons developments are outside of the Established Income Range.” In other words, it provides the opportunity to exclude entire developments or selected units from the application of the requirement to deconcentrate poverty and mix incomes if the income profile for these units or developments is consistent with furthering both the goals of deconcentration and the local goals and strategies contained in NYCHA’s Annual Plan. Developments and unit types that fall into this category are not limited to, but include those developments that:

- are subject to a consent decree agreement or a judicial decree covering the resident selection;
- are part of a PHA program/strategy that is specifically authorized by statute such as mixed income or mixed finance developments, a homeownership program, a strategy designed

to promote income-mixing in public housing or one designed to raise the income of public housing residents;

- are designed via size, location or other configuration to promote income deconcentration; or
- have income characteristics that can be explained by other circumstances.

All 16 NYCHA developments that have mean gross incomes outside of the EIR from the Deconcentration Requirement should be excluded, because all NYCHA developments are part of NYCHA's explicit strategy to promote income-mixing in each of its developments. That strategy is spelled out in NYCHA's Tenant Selection and Assignment Plan ("TSAP"). Under the TSAP, each development must adhere to income-mix requirements each year, renting no less than 40% of its vacancies to Very Low-Income Families (making 30% or less of area median income), but balancing that with the Working Family Preference, which gives priorities to higher-income and working families.<sup>22</sup> This plan has been in place since 1998. Over time, it should produce a generally uniform and healthy income mix in all NYCHA developments. Since NYCHA already has this deconcentration plan built into its rental scheme, it need not do anything more to comply with the Deconcentration Requirement.

NYCHA has chosen, however, to be more aggressive in addressing the income mix at the Lower Income Developments. It has therefore targeted its Economic Integration Plan to those developments.

Step 5 of the Deconcentration Requirement outlines the policy for deconcentrating poverty and income mixing in developments where the developments' income profiles outside the EIR cannot be explained or justified. Step 5 also specifies that a PHA will be found in compliance with the Deconcentration Requirement if:

- all of the PHA's developments are within the Established Income Range;
- the PHA provides sufficient explanation in its Annual Plan to support the income mix of developments above or below the EIR as consistent with and furthering the goal of deconcentrating poverty, income mixing and the goals of the PHA's Annual and Five-Year Plans; or
- the agency's deconcentration policy provides specific strategies to promote deconcentration of poverty and income mixing at developments that are outside the EIR.

As explained above for Step 4, NYCHA can justify all the developments outside the EIR, because they are all part of the TSAP income-mix rental scheme. Even if this could not satisfy Step 4, however, NYCHA's TSAP rental scheme would satisfy Step 5, since it already constitutes a sufficient

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<sup>22</sup> Federal law requires PHAs to rent no less than 40 percent of their vacancies to Very Low Income families, but it does not require them to apply this requirement to each development. NYCHA has chosen to apply the requirement to each development, with the explicit goal of producing a more uniform income mix. Likewise, NYCHA has designed its Working Family Preference to bring more working families into *each* development, to achieve a healthy and uniform income mix.

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.

## **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
- 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
- Bushwick
- Castle Hill
- Chelsea
- Drew-Hamilton
- 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.

<b>NOTICE</b>	NYCHA does not endorse any particular organization or assume any liability in connection with a resident's Community Service. Each resident is solely responsible for seeking an appropriate organization to fulfill this federal law requirement.
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Residents must provide verification of the services performed by submitting the *Community Service Performance Verification* form. 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:

<p><b>Community Service</b> is <u>defined</u> by the law as: the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. Community Service is not employment and may not include political activities.</p>
<p><b>Examples of where to find Qualifying Community Service Activities</b></p>
<p>Residents may volunteer to perform Community Service with NYCHA or any federal, state or municipal agency, or for any community or faith-based organization. Residents can visit their Property Management Office or access volunteer opportunities through the following:</p> <ul style="list-style-type: none"> <li>▪ NYC Service – Located on the internet at <a href="http://www.nycservice.org">www.nycservice.org</a></li> <li>▪ By calling <b>3-1-1</b> the NYC Citizen Service Center</li> <li>▪ The <b>Volunteer Match</b> database located on the internet at <a href="http://www.volunteermatch.org">www.volunteermatch.org</a></li> </ul> <p>Residents can also perform service for groups not listed above. If there is any question about whether the service can be credited as Community Service, it is advised that residents ask their Property Management Office.</p>

<b>Examples of NYCHA Community Service Activities</b>	
Resident Watch <ul style="list-style-type: none"> <li>▪ Resident Green Committees (“RGC”)</li> <li>▪ Attendance at Resident Association meetings</li> <li>▪ Delegate/Alternate at RAB meetings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Community Center/Senior Center volunteer</li> <li>▪ Help at resident sponsored community clean-up days</li> <li>▪ Attending meetings called by NYCHA</li> </ul>
<b>Examples of Non-NYCHA Community Service Activities</b>	
<b>Volunteer for local government, community, or faith-based organizations that serve a public benefit</b>	
<ul style="list-style-type: none"> <li>▪ Food Bank</li> <li>▪ Hospital</li> <li>▪ Nursing Home/Hospice</li> <li>▪ Ambulance service</li> <li>▪ Programs providing support to families with hospitalized members</li> <li>▪ Parks Department</li> <li>▪ Library</li> <li>▪ Reading Program</li> <li>▪ Parent Teacher Association (“PTA”) meetings</li> </ul>	<ul style="list-style-type: none"> <li>▪ School</li> <li>▪ After School Programs</li> <li>▪ Day Care Facility</li> <li>▪ Habitat for Humanity</li> <li>▪ Boys or Girls Club</li> <li>▪ AmeriCorps</li> <li>▪ Police Department</li> <li>▪ Auxiliary Police</li> <li>▪ Youth Mentoring</li> <li>▪ Vista</li> <li>▪ Court ordered Community Service</li> </ul>
<p><b><i>Economic Self-Sufficiency</i></b> is <u>defined</u> by the law as: any program that is designed to encourage, assist, train or facilitate the economic independence of its participants and their families. An <i>Economic Self-Sufficiency</i> program can also provide work for its participants.</p>	
<b>Examples of Qualifying Economic Self-Sufficiency Activities</b>	
<ul style="list-style-type: none"> <li>▪ Any REES or RES program <sup>1</sup></li> <li>▪ Work placement</li> <li>▪ Apprenticeship</li> <li>▪ Any program necessary to prepare a participant for work (including substance abuse or mental health treatment programs)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Employment counseling</li> <li>▪ Basic skills training</li> <li>▪ English proficiency</li> <li>▪ Workfare</li> <li>▪ Financial management</li> <li>▪ Household budgeting or management</li> </ul>

<sup>1</sup> REES is NYCHA’s Resident Economic Empowerment and Sustainability

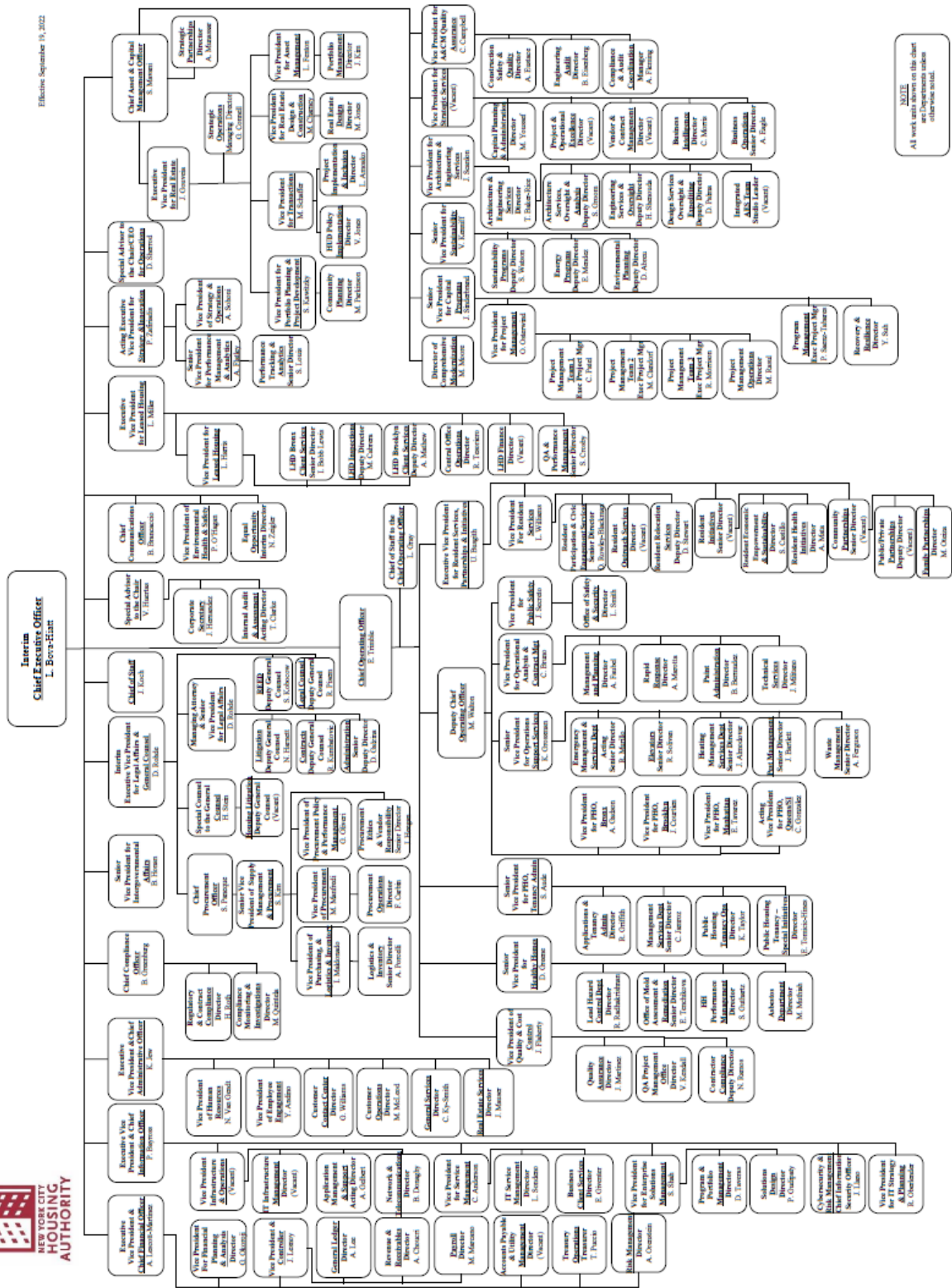
# ATTACHMENT H

## PHA Management Organizational Chart

### NEW YORK CITY HOUSING AUTHORITY ORGANIZATION CHART



Effective September 15, 2022



All work is done on the job unless otherwise noted.

**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 March 1, 2022, Stanton Street housed 13 families having the following racial/ethnic characteristics. There were no changes found in the race/ethnic characteristics for these families. 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 and was amended in 2022 in response to New York State's Marijuana Regulation and Taxation Act of 2021.

#### **NYCHA's Smoke-Free Policy**

NYCHA prohibits the smoking of tobacco and marijuana products in restricted areas. Smoking means inhaling, exhaling, burning or carrying any lighted or heated cigar, cigarette, little cigar, pipe, water pipe (hookah), or any similar form of lighted object or device containing tobacco or marijuana. Restricted areas include public housing apartments, all interior areas, and areas within 25 feet of public housing buildings or to the property boundary if less than 25 feet from a NYCHA building. Smoking in these areas is a violation of the public housing lease.

In addition, using electronic cigarettes (also called e-cigarettes or e-cigs) in indoor common areas is prohibited under local law. Local law also prohibits smoking in playgrounds. 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.

NYCHA's adoption of its smoke-free policy does not make it a guarantor of the smoke-free condition of restricted areas. NYCHA will take reasonable steps to enforce its policy. Property Management staff enforces the Smoke-Free policy using an informal resolution process and a graduated enforcement approach with educational efforts.

#### **Partnering with Residents, the NYC Health Department and Other Leaders**

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**

	<b>Delegate Name</b>	<b>Development</b>	<b>District</b>	<b>Delegate/ Alternate</b>
1	Barbara McFadden	Nostrand	Brooklyn South	Delegate/CCOP
2	Julia Daniely	Carey Gardens	Brooklyn South	Delegate
3	Frances Brown	Red Hook East	Brooklyn South	Delegate
4	Sheryl Boyce	Bayview	Brooklyn South	Delegate
5	Marie Navarro	Gravesend	Brooklyn South	Delegate
6	Amarilys Herrera	Marlboro	Brooklyn South	Delegate
7	Tyree Stanback	Lafayette Gardens	Brooklyn West	Delegate/CCOP
8	Lohoma Shipman	Bushwick	Brooklyn West	Delegate
9	Darold Burgess	Ingersoll	Brooklyn West	Delegate
10	Gloria Johnson	Tompkins	Brooklyn West	Delegate
11	Naomi Colon	Marcy	Brooklyn West	Delegate
12	Adorn Dubose	Sumner	Brooklyn West	Delegate
13	Reginald H. Bowman	Seth Low	Brooklyn East	Delegate/CCOP
14	Marie Boone	Tilden	Brooklyn East	Delegate
15	Lisa Kenner	Van Dyke	Brooklyn East	Delegate
16	Naomi Johnson	Howard	Brooklyn East	Delegate
17	Carolyn Johnson	Albany	Brooklyn East	Delegate
18	Lilithe Lozano	Parkside	Bronx North	Delegate/CCOP
19	Keith Ramsey	Eastchester Gardens	Bronx North	Delegate
20	Geraldine Hopper	Clason Point Gardens	Bronx North	Delegate
21	Maurice Tony Edwards	Marble Hill	Bronx North	Delegate
22	Emma Miller	Boston Secor	Bronx North	Delegate
23	Walter McNeil	Edenwald	Bronx North	Delegate
24	Daniel Barber	Jackson	Bronx South	Delegate/CCOP
25	Princella Jamerson	Millbrook/Millbrook Ext.	Bronx South	Delegate
26	Cassandra Bowlin	Melrose	Bronx South	Delegate
27	Dana Elden	St. Mary's Park	Bronx South	Delegate
28	Gwendolyn Primus	Webster/Morrisania	Bronx South	Delegate
29	Ethel Velez	Johnson	Manhattan North	Delegate/CCOP
30	Nathaniel Green	Dyckman	Manhattan North	Delegate
31	Wayne Breamfield	Drew Hamilton	Manhattan North	Delegate
32	Bernadette McNear	Rangel	Manhattan North	Delegate

33	Luis Torres	Clinton	Manhattan North	Delegate
34	Aixa Torres	Smith	Manhattan South	Delegate/CCOP
35	Claudia Perez	Washington	Manhattan South	Delegate
36	Cynthia Tibbs	WSUR Brownstones	Manhattan South	Delegate
37	Nina Saxon	Carver	Manhattan South	Delegate
38	Kazi Islam	Lower Eastside II	Manhattan South	Delegate
39	Ramona Minor	DeHostos	Manhattan South	Delegate
40	Tamika Williams	Pomonok	Queens North	Delegate/CCOP
41	Corinne Woods-Haynes	Queensbridge I &II	Queens North	Delegate
42	Vanessa Hall	Astoria	Queens North	Delegate
43	Bridget Marachlian	Bland	Queens North	Delegate
44	Manuel Martinez	South Jamaica I & II	Queens South	Delegate/CCOP
45	Lawanda Gainey-Johnson	Carleton Manor	Queens South	Delegate
46	Eugenia Gibson	Beach 41 <sup>st</sup> St	Queens South	Delegate
47	Addie Williams	International Towers	Queens South	Delegate
48	Margareth Massac	Oceanside	Queens South	Delegate
49	Joyce Hutton	Colon Lifhe	Queens South	Delegate
50	Brenda "Kiko" Charles	Mariners Harbor	Staten Island	Delegate/CCOP
51	Shekina Butler	West Brighton I & II	Staten Island	Delegate
52	Dr. Brenda Harris	Cassidy/Lafayette	Staten Island	Delegate
53	Geraldine Parker	Stapleton	Staten Island	Delegate
54	Clifton Creque	Berry	Staten Island	Delegate
55	Lorraine Brown	334 East 92 <sup>nd</sup> St	Section 8	Delegate

## **ATTACHMENT L**

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

#### **March 31, 2022 Agenda**

- Introductions
- Roll Call
- Budget Briefing
- Upcoming Annual Plan Schedule
- Comments and Questions

#### **April 14, 2022 Agenda**

- Introductions
- Roll Call
- Organizational Plan Update
- Implementation Milestones
- Neighborhood Model
- Project Deep Dive
- Property-based Caretaker Schedules
- Work Order Reform
- Comments and Questions

#### **May 5, 2022 Agenda**

- Introductions
- Roll Call
- 2022 Capital Grant and 5-Year Plan
- Section 3
- Survey on RAB meeting topics
- Upcoming Annual Plan Schedule
- Comments and Questions

#### **May 19, 2022 Agenda**

- Introductions
- Roll Call
- Real Estate Development Department
- Section 3
- Upcoming Annual Plan Schedule
- Comments and Questions

### **June 2, 2022 Agenda**

- Introductions
- Roll Call
- Conversation with COO Daniel Sherrod
- Comments and Questions
- Upcoming Annual Plan Schedule

### **September 15, 2022 Agenda**

- Introductions
- Roll Call
- FY 2023 Flat Rent Schedule
- Overview of NYCHA's presentations to the RAB in 2022
  - Budget Briefing
  - Transformation Plan
  - Capital Projects
  - Real Estate Development/PACT/RAD
  - Operations
- Schedule for review of RAB presentations with NYCHA staff
- Training on the Annual Plan/Significant Amendment process and the Role of the RAB
- Comments and Questions

## ATTACHMENT M

### COMMENTS FROM NYCHA'S RESIDENT ADVISORY BOARD (RAB)

#### Budget and Finance

##### General

- A RAB member asked if the amount of money that NYCHA receives from HUD annually predicated on the number of occupied units? And does this amount go up a certain percentage each year?

*NYCHA receives three sources of funding from HUD:*

- 1. Federal Operating Subsidy – Operating subsidy is provided through a regulatory formula. Components of the formula include the cost of operating, the number of occupied units, utility costs, rent charged (not rent collected), and other regional factors. The amount of funding we receive can change each year depending on what Congress appropriates for the program and the funding eligibility of all Public Housing Authorities nationwide. On average NYCHA receives one of every five dollars distributed in this program. It is important to note that we do not have a dollar-for-dollar amount as the formula does not fully provide for the true operating costs of the Authority.*
  - 2. Section 8 – Also by appropriated by Congress, it considers how many units are leased, renewal costs, new vouchers, etc. The administrative fees also have a formula for how much is given to each public housing authority.*
  - 3. Federal Capital Grant – Also appropriated by Congress and funds are distributed through a regulatory formula. The amount of funding we receive can change each year depending on what Congress appropriates for the program and the funding eligibility of all Public Housing Authorities nationwide.*
- A RAB member wants to know how much stimulus money has NYCHA received from HUD? Has NYCHA received all of it? And have all of these funds been distributed, or are some in a bank collecting interest? If some of those funds are collecting interest, how is that interest used?

*NYCHA received stimulus funding in 2020 through the CARES Act, totaling \$150 million for Public Housing, and \$37 million for Section 8 administrative fees. Those funds cannot be co-mingled. The funds were fully expended by the December 31, 2021 deadline. Any unexpended funds would have been returned to the U.S. Treasury.*

- A RAB member wants to know where NYCHA derives its financial information from. If nothing is changing or improving, where is the spending going?

*The financial information NYCHA presents is its actual expenditures pulled directly from the financial system. It reflects spending for individuals that work in NYCHA departments and*

*properties as well as spending on vendor contracts, supplies, and equipment for actual costs incurred by the Authority. NYCHA Operations is best poised to speak to the effectiveness of the programs they run.*

- A RAB member wants to know in the 2021 Year-end reforecast, what accounted for the high overtime costs at NYCHA in 2021?

*NYCHA determined that high overtime cost corresponded with high staff vacancies. Our largest vacancies are for caretakers, followed by maintenance, plumbers, elevator mechanics, and painters. When a NYCHA employee does overtime, what is being worked on during that time must be tracked in the system by overtime code. At a high-level, \$33 million of overtime costs was for weekend and holiday work, \$23 million was to address the work order backlog and other deadlines, \$16 million was for emergency response and other weather-related work, \$13 million was for environmental issues, another \$13 million was for special initiatives, \$12 million was for heat and hot water, \$12 million was for utility outages, \$6 million was for elevators, and \$35 million for “other” small categories (some uncoded).*

- A RAB member wants to know if funds anticipated for the Blueprint for Change and for the Transformation Plan reflected in NYCHA’s current financials?

*The 2022 Budget adopted by the NYCHA Board on December 30, 2021, includes critical staffing and resources in support of the pillar areas of the HUD/SDNY Agreement and the Transformation Plan. The budget did not include funding for the Blueprint for Change, which was not yet approved by the State legislature at the time the 2022 Budget was adopted.*

- A RAB member asked if the costs affiliated with Pillar and Transformation Plan investments (\$47M for the Transformation Plan, and \$38M for Compliance/Agreement Pillars) annual costs?

*It depends on the item. NYCHA is responsible for salary and fringe benefits for new staff members in perpetuity so those will be annual recurring costs. Spending on Other Than Personnel Services (OTPS) items like contracts, supplies and equipment can vary each year; those investments will be reconsidered during the next budget to determine the appropriate level of investment needed to meet our goals.*

- A RAB member wants to know if the \$137 million that has been “added to the baseline to fund SDNY/HUD Agreement pillar areas and continue Transformation Plan implementation” now an annual contribution, or just for this cycle?

*That amount is for this year, 2022.*

- A RAB member asked what percentage of the Estimated 2022 Uses are Personnel Services (PS)?

*Personnel Services represent 37% of the Estimated 2022 Uses.*

- A RAB member asked if Con Edison gives NYCHA a deep discount on its energy costs?



*No. NYCHA goes through the New York Power Authority for its electricity. NYCHA pays for the electricity it uses, as well as for the operation of the plant in Astoria. The cost may be slightly cheaper than a private landlord, but it is not a deep discount.*

### RAD/PACT and Section 8

- A RAB member wants to know what is the administrative fee NYCHA received for Section 8 contracts? How much is received per unit?

*The administrative fee that we received last year FY2021 is \$128 million and includes the Emergency Housing Voucher Administrative Preliminary and On-Going Fee, Housing Choice Voucher (HCV) Administrative Fee and Cares Act. The FY2021 fee per unit was \$114.48 for the first 600 units and \$106.84 for all remaining units.*

- A RAB member wants to know in the 2021 Year-end Reforecast, what monies were specifically spent on Section 8 tenants?

*The Section 8 Housing Assistance Payment (HAP) constitutes the amount paid to Section 8 landlords. The actual payment to the landlord for FY2021 is \$1.256B and includes the Housing Choice Voucher HCV program, Emergency Housing Voucher (EHV) program and Cares Act Owner Incentive Payments.*

- A RAB member asked what Section 8 revenue has been utilized to cover public housing concerns?

*The Section 8 program funds are not allowed to be used to cover Section 9 public housing concerns. Per HUD requirement, those funds must be used separately and cannot be co-mingled. (PIH-2015-17 - #3). However, NYCHA annually earns a program management fee and bookkeeping fee from the Section 8 program. Those fees are considered revenue to the public housing program and are included as a source of revenue in the operating budget each year.*

- A RAB member asked what is the breakdown for Section 8 arrears between January 2020 and December 2021?

*The collection loss is only for Public Housing resident as NYCHA does not collect rent payment information for section 8 tenants who pay directly to private landlords. For The Section 8 tenants living in NYCHA developments, the arrear balance was \$76,132,490 in Fiscal year 2020 and \$112,357,339 in Fiscal year 2021.*

- A RAB member commented that NYCHA should share the breakdown of the number of Section 8 and RAD/PACT tenants that have been evicted during COVID, and how that is being handled. Even though evictions were not allowed during COVID-19, it still occurred.

*There was a nation-wide eviction moratorium in effect through January 31, 2022. This applied to instances of non-payment of rent. Residents could be evicted for breaking their leases in another ways, but not for non-payment of rent.*

- A RAB member wants to know why NYCHA still gets money per apartment for buildings that have converted to RAD/PACT?

*NYCHA gets funds because it is the Section 8 administrator of the Section 8 vouchers. Whether PACT or a private development where there are residents using Section 8 vouchers, a small amount of administrative funding is to run that program for HUD. Out of the PACT transaction, we also collect certain fees. If the PACT developer is able to reduce the operating cost over time but maintain the quality of service, rather than the developer keeping all of that return, we want to put that back into public housing because NYCHA continues to own the land and building for PACT properties.*

### Interest

- A RAB member asked if the interest NYCHA earns goes into a discretionary fund?

*It depends. Every program has a different requirement as to whether their funds can even be held in a bank account that can gain interest. For example, FEMA funds cannot be put into an interest-bearing account. For public housing operating funds, anything that is not spent can accrue interest in financial instruments specified by HUD, and those funds are put back into the public housing program. (The interest earned has the same use restrictions as the funds themselves.)*

*Annually, NYCHA considers market trends and projects the estimated amount of interest we expect to earn on applicable cash accounts. The earned interest is included in the operating budget, specifically in the “other revenues” budget line. For example, if NYCHA anticipates earning \$500,000 in interest on applicable cash accounts, the funding is included in other revenues and expended in the public housing program as applicable.*

- A RAB member wants to know who decides how NYCHA’s earned interest gets to be spent?

*Earned interest does not fund any specific initiative. It is included as a source of revenue and helps to support all of the stated expenses of the public housing program.*

### Monitoring, Auditing, and Reporting

- A RAB member wants to know who is responsible for monitoring and ensuring that staff are accurately reporting and coding their overtime hours? Are any other entities monitoring NYCHA’s financials?

*NYCHA is overseen by the federal Monitor, it receives independent oversight by the Office of the Inspector General, and it also receives federal oversight by HUD to ensure NYCHA is spending funds appropriately. From a financial standpoint, NYCHA also engages an independent external financial auditor each year to complete the audited financial statements and Single Audit Report. There are at least four independent parties external to NYCHA that are monitoring it.*

- A RAB member inquired about the timing of NYCHA’s audit process.

*Every year we undergo an extensive audit done by an independent external auditor (one of the “Big Three” accounting firms) to ensure all financial information is presented accurately in all material aspects. Our annual financial statements are presented publicly to the NYCHA Audit Committee, NYCHA Board and the NYC Audit Committee in June/July of each year. The historical and current financial statements are publicly available on the NYCHA website.*

- A RAB member asked when does the Comptroller conduct audits of NYCHA?

*The NYC Charter – Chapter 5, Section 93 provides for the powers and duties of the NYC Comptroller. Specifically, Section 93(c), provides that “the Comptroller shall have the power to audit all agencies, as defined in subdivision two of section eleven hundred fifty, and all agencies, the majority of whose members are appointed by the City Officials”.*

*As mentioned above, please find below subdivision two of Section 1150:  
Section 1150, Definitions.*

*For the purposes of this charter:*

- 1. The term "city" shall mean the city of New York, and unless the context otherwise requires, shall include the several boroughs.*
- 2. The term "agency" shall mean a city, county, borough, or other office, position, administration, department, division, bureau, board or commission, or a corporation, institution or agency of government, the expenses of which are paid in whole or in part from the city treasury.*

*Based on the NYC Comptroller’s power and duties, audits of NYCHA may be conducted at any time. As such, there is no specific time designated for the New York City Comptroller’s Office, to conduct audits of NYCHA. On average, the New York City Comptroller’s Office conducts at least one audit every year.*

- NYCHA should provide its residents with its “Comprehensive Annual Financial Report for the Years Ended...” report once it is released in June. The RAB members should also receive copies of the final 2019 and 2020 audited financials for their review.

*The historical and current financial statements are publicly available on the NYCHA website. The financial statements are posted each year following the approval of the NYCHA Board in June/July. <https://www1.nyc.gov/site/nycha/about/annual-plan-financial-information.page>*

### Rent Collection, Evictions, and ERAP

- Some residents who were not working previously, but are working now, may not have reported their new income. NYCHA needs to update its software/systems so that residents are not able to do this.

*When public housing and Section 8 residents fill out their annual income reviews, they must report every member of their household and form of income by source. This information*

*(including name, dates of birth, and social security numbers) is transferred to HUD daily. HUD has an earned income verification (EIV) system, which matches records with the state's Department of Labor in an internal computer system. If individuals are not reporting income on their annual review, it will still show up via this matching system, and NYCHA will address the matter with the household. This may result in retroactive charges and/or termination of tenancy proceedings for misrepresentation.*

- A RAB member asked if a question will be added to the recertification form to ask residents to list entrepreneurial endeavors from home as a source of income?

*Self-owned businesses are a source of income required to be reported. Even if residents are babysitting, working as self-employed home healthcare aids, or catering from their apartments, residents are already required to report this as income.*

- NYCHA should share how it is tracking its eviction rates.

*There is a [press release on NYCHA's website](#) which addresses NYCHA's eviction rates. Recently, NYCHA has seen issues with rent payment—COVID has led to many financial obstacles for residents, and NYCHA has taken a huge hit in its revenues. NYCHA is working with residents to resolve rent issues and has voluntarily withdrawn approximately 30,000 pre-pandemic non-payment cases. NYCHA also assisted over 29,000 residents in submitting ERAP (Emergency Rental Assistance Program) applications to New York State for rental assistance. ERAP imposes certain tenant protections against eviction while the ERAP application is pending.*

- A RAB member asked what is NYCHA's current plan to collect arrears?

*NYCHA is hopeful that the State will pay NYCHA the ERAP funds it is owed. NYCHA also conducted extensive training sessions with property management staff related to rent collection activities. This included addressing the list of chronic and current rent-delinquent tenants, making telephone contact, notifying HRA regarding rent arrears for public assistance recipients, referring any non-payments to Family Partnership where there are at-risk tenants, working through rent-delinquency resolutions, and rent breakdown and collection form letters as well. Property Managers were trained on this in January 2022 before the eviction moratorium expired. A session was held for each borough as a reminder of the enforcement actions that can be taken. NYCHA is not pursuing large-scale evictions for individuals who cannot pay rent, but is seeking to be more targeted and strategic, taking the rent-collection actions listed above. A refresher training will be offered for Property Management staff in August.*

- NYCHA should share a copy of the training materials it gives to property managers and other staff for collecting rent.

*NYCHA can give a briefing on this topic to the RAB.*

- How is NYCHA's fiscal department tracking what is going on with New York State and with NYCHA apartments who have applied to the ERAP program?

*NYCHA is tracking this and has submitted ERAP applications on behalf of over 29,000 residents, amounting to \$110 Million in arrears. It has been confirmed that all of these submissions have been received. However, to date, NYCHA has not received any money from the State, as federally subsidized households are last on their priority list.*

- June 1 was the one-year anniversary of all of the applications that were submitted to the ERAP program. A RAB member asked what is NYCHA doing, as NYCHA residents' applications have not yet been processed by the state?

*NYCHA has no influence on whether NYS will process those applications or not. NYCHA submitted over \$400 million-worth of applications and has another \$130 million ready-to-go as soon as the state allows them to be submitted. To protect NYCHA tenants, anyone who submitted an ERAP application will not have a lease enforcement action taken against them for the ERAP balance. Residents are expected to pay their rents going forward beyond the balance submitted in the ERAP applications, but many residents are still not paying rent.*

- NYCHA needs to send notices out to residents, alerting them to the fact that non-payment of the balances listed in their ERAP applications will not be held against them.

*NYCHA sent many notices, knocked on doors and used other methods of communication to encourage residents to apply for ERAP.*

- A RAB member wants to know if submissions to the ERAP program have been accounted for in NYCHA's analysis for the budget?

*As of June 16, NYCHA has submitted \$118 million worth of ERAP applications to New York State for about 31,000 households. The State has not yet provided NYCHA with any ERAP funding.*

- When NYCHA creates tables and charts which are shared with the RAB, NYCHA should include examples of relevant developments so that resident leaders have that context, rather than just showing blanket statistics and statements. When NYCHA presents financial information, it should always include a breakdown for Section 3.

*NYCHA will ensure that materials presented to the RAB have the information requested.*

## **Transformation Plan**

### **Work Order Reform**

- NYCHA should conduct a test run of the Work Order Reform initiative in one development-per-borough, specifically in those developments which have active RAB members, so that they may provide the greater RAB membership first-hand accounts.

*Work Order Reform began in Queens and Staten Island and has begun its roll-out in part of the Bronx. Roll outs like these tend to start in Queens and Staten Island because those boroughs have fewer developments, with a diverse range of sizes.*

*NYCHA continues to absorb feedback from employees and residents to determine how well things are working at each stage and making appropriate adjustments as things progress. There are ongoing Resident Briefings in each of the boroughs and*

- A RAB member asked how is information being communicated to Manhattan developments before the roll out of the Work Order Reform Initiative?

*Before a roll-out, we visit each development and speak at meetings with property management staff, maintenance workers, and superintendents. We will also contact resident leaders at each development. We do this one-to-two months prior to the launch. Once the program is set to begin, we will host two Resident briefings, during which the Work Order team will review the program and answer any questions that arise.*

- Many work orders are closed by workers falsely asserting that the resident is not home, when in actuality the workers never showed up to make the repairs. Work order reform as a part of the Transformation Plan means little if this issue is not also addressed.

*This behavior is unacceptable. Going forward, if residents become aware of this conduct, they should immediately inform NYCHA's Quality Assurance and Compliance departments, which will result in an investigation and appropriate consequences. Moreover, NYCHA is working with superintendents to make sure the maintenance workers are showing up for scheduled repairs and inspections, and as part of the Work Order Reform NYCHA is looking at the way they are assigning tickets.*

### Hiring

- It is great that NYCHA is hiring additional skilled trades staff as a part of the Transformation Plan, but is NYCHA also hiring more heating staff? This is annually a major issue for NYCHA residents.

*Yes, NYCHA is hiring more heating staff. As of this writing, NYCHA has hired and trained 70 new Heating Plant Technicians and has plans to hire and train 25 more.*

### Resident Engagement

- A RAB member stated that before NYCHA goes forward with any new plans, it needs to involve residents at the beginning, middle, and end. How have residents been involved in the Transformation Plan? Were any members of the RAB involved?

*We agree. Resident participation has been included in the Transformation Plan every step of the way. NYCHA has formed working groups for each project, inviting residents to sit at the table with NYCHA staff to work on them. These include the Alternate Work Schedule (AWS) project, Work Order Reform, and the Closed Work Ticket Project. NYCHA also created the Resident Roundtable, comprised of 32 residents who are giving additional feedback and recommendations to NYCHA as a part of the implementation of the Transformation Plan programs. The Transformation Plan team has also presented the program to the Resident Advisory Board on several occasions over the past three years.*

- A RAB member inquired about the purpose of the Resident Advisory Board if it is not included/able to advise on the Transformation Plan and its components? The RAB always hears about what is happening after the fact.

*This is an area in which NYCHA is working to improve. Historically, NYCHA has had a tendency to consult with the CCOP for resident feedback on major issues like the Transformation Plan. But NYCHA acknowledges the need to have a broader and more diverse feedback group and is having discussions about how to better engage the RAB in this work.*

- A RAB member asked about how residents were chosen for the Resident Roundtable? Were residents denied for being too opinionated? Resident Engagement tends to select residents they get along with for things like this.

*The Resident Roundtable membership was chosen via a lottery.*

- A RAB member would like resident leaders to add input as far as reviewing staff work performance. Resident leaders should have a designated email address where they can share feedback. Resident leaders should be able to provide a bi-monthly or quarterly report card, rating staff A – F.

*As things stand now, Property Managers must meet with resident leaders monthly, and provide a written report from these meetings (which is signed off on by the resident leaders), and then sent up to the VP and Neighborhood Administrators. Neighborhood Administrators are also now attending evening Resident Association Meetings when invited, as well. These are formal processes that all developments should be following.*

*NYCHA has been looking into new and improved resident feedback opportunities, specifically overall resident feedback, feedback on Property Management and feedback regarding work that was completed in their apartments.*

## **Capital Improvements**

### Capital Projects Prioritization

- A RAB member wants to know how does NYCHA prioritize developments for capital projects? Who do staff speak to in order to make prioritization decisions?

*The Capital Planning team gets input from property staff as well as technical teams such as elevators and heating, to see what areas at each property are in bad condition and are therefore a priority, and this usually reflects the challenges and priorities residents have been raising. Moving forward, NYCHA staff intend to go out to properties annually to talk to Resident Association leaders and Property staff to identify priorities and to conduct annual resident surveys on capital investment priorities.*

- A RAB member stated that at Howard Houses, no one has ever asked to speak with them, the resident leader, about capital needs. They typically have to ask Property Management when staff will be coming to the development to speak about capital needs.

*That is something we want to do more consistently at all sites. Talking to Resident Association leaders about capital priorities was not a consistent practice in the past. A site visit is being scheduled for late July.*

- A RAB member asked that Capital Projects come to Douglass Houses to discuss upcoming projects.

*On June 27, 2022, a team from Asset & Capital Management visited Douglass Houses to speak with resident leadership and provide an overview of projects, including gas risers, roof renovation, and a mechanical project. A detailed write up with additional information, as requested by the TA President, was shared in print and then via email following the site visit.*

### RAD/PACT

- A RAB member wants to know if NYCHA continues to make repairs to developments that are in the process of being converted to RAD/PACT?

*NYCHA remains the property manager until the conversion and is responsible for responding to work tickets until then.*

- A RAB member asked if the funding listed under Federal Plan 2022 – 2026 for future repairs still go to those developments under-going RAD/PACT conversion? If not, will it be reallocated to those developments still under NYCHA's control?

*NYCHA does not put funds toward developments that have already converted to Project-Based Section 8 through the PACT program. For PACT developments that are still in the planning stages (meaning they have not yet transitioned to new management), ongoing capital projects from the previous plan will continue. NYCHA typically will not start a new capital project (which may take 3-4 years to complete) at a development that is transitioning to Project-Based Section 8 in the very near future. In these instances, it is often better to address the repair need through the comprehensive rehabilitation to be undertaken by the PACT partner.*

- A RAB member wants to know for converted PACT/RAD developments - who investigates to ensure that money is spent in the right ways? Who checks the quality of materials being used?

*There are various entities who check the quality of work. When using a Section 8 voucher, the unit itself has to go through a process where HPD checks the quality and safety of the unit. These are called Housing Quality Standard (HQS) inspections. Any time a resident of a Section 8 unit feels there's a problem, then can report that to NYCHA or HPD and have them come out and do an inspection. If the unit does not pass the inspection, the PACT partner could risk losing subsidy for that unit. This provides an additional incentive for PACT partners to respond to work tickets in a timely manner. There are multiple ways for residents to reach*



out if there is a problem, whether it is something physical in their unit or service related. They can reach out through HPD, 311, NYCHA's Compliance Department, or the Customer Contact Center, to name a few examples. In certain areas, such as for lead-based paint removal, NYCHA hires third-party monitors. On an ongoing basis, there are regular annual recertifications of the quality of units. NYCHA has also hired construction monitors to actively monitor the construction at each site.

NYCHA also has an Asset Management Department, which makes sure that PACT partners continue to meet all requirements in terms of addressing work orders and closing them to resident satisfaction.

- A RAB member stated that converted developments they have seen look like garbage. When converting to PACT/RAD, does NYCHA always go with the very lowest bidder?

*Through the PACT program, NYCHA is not required to select the lowest bidder. We work closely with resident leaders to select the PACT partners who are best suited to meet the needs of each community. Once a PACT partner team is selected, NYCHA and resident leaders collaborate with the partner to design detailed plans for the property rehabilitation, management, and social services.*

*Residents living at PACT developments where construction has been completed are overwhelmingly satisfied with the results of the work and benefit from significant improvements to their quality of life. Resident leaders at PACT developments consistently join NYCHA and our partners in giving tours to other members of the NYCHA community, where they share their positive experiences firsthand.*

### Section 3

- RAB members requested that Capital Projects' future presentations should include a Section 3 breakdown. \$100,000 does not have to go out for bid. I think that there should be set-aside for Section 3 resident-owned businesses so jobs like scaffolding and others that fall below that cap would automatically go to them.

*We will take that under advisement and will aim to better highlight Section 3 participation.*

### Individual Developments

- A RAB member commented that scaffolding at developments needs to come down. Scaffolding has been up at Douglass Houses for over two years. Residents have been told that the scaffolding is up due to brickwork, but no work is being done. The scaffolding is dangerous, perpetuates crimes, and makes people scared to come out. NYCHA is moving forward with capital projects; why doesn't it focus on those already in progress/those that have scaffolding in place? NYCHA needs to do the work and then take the scaffolding down.

*Unfortunately, many sites face the same issues. Under local laws mandated by the NYC Department of Buildings, if any issues are found with building brickwork and facades, NYCHA is required to install and maintain sidewalk sheds until these issues can be fully repaired. We've struggled to raise money to make brick repairs to facades. Most of the funding is used*

*for HUD pillars (heating, mold & leaks, lead-based paint, elevators, and waste management). We do our best to provide lighting and to move security cameras for safety issues, and to address garbage thrown in fenced areas around the sheds. We're working on how to raise funding to do repairs so that we can take the sidewalk sheds down. Brickwork is not considered capital eligible for capital funds provided by the City, so we are working to try to get more Federal and/or State funds to be able to undertake the repairs required.*

- A RAB member wants to know if Douglass Houses had a capital project for which sidewalk sheds were required, why hasn't NYCHA been able to take the scaffolding down? If contractors were on the ground doing the work, why should there still be issues with future inspections?

*There are two kinds of sidewalk sheds found on NYCHA developments: 1) construction sheds, which are removed once a contractor has completed the construction and obtains all necessary permits for the capital project, and 2) pedestrian protection sheds, which are erected in response to local law required inspections and are maintained until funding is identified for repairs. We're required by the NYC Department of Buildings to do an inspection at every building every 5 years. If that inspection finds any unsafe issues in the brickwork, then the shedding has to be put up immediately. It can be taken down as soon as the brickwork repairs are completed, and the issue is resolved. If the sheds are still up, that would mean that issues remain. After looking into what specifically happened at Douglass, we determined that the sidewalk sheds that are in place are temporary pedestrian protection sheds. Once funding is identified and repairs are made, they will be removed.*

- A RAB member stated that NYCHA has money for things such as lobbying for the Blueprint for Change in Albany. Why doesn't NYCHA use those funds to make repairs so that sidewalk sheds can be taken down?

*In the last few years, NYCHA has spent several hundred million dollars fixing facades at many buildings and took down around 114,000 feet of sheds. However, that is not nearly enough to reach all developments. We continue to try to mobilize more funding to use towards the brick work.*

- A RAB member stated that although brickwork was completed at Bay View Houses over two years ago – scaffolding has been put up as well as NYC Department of Building signs in the lobbies stating that the buildings/ facades are unsafe. They heard that the brickwork was done incorrectly, but nothing is currently being done to correct it. NYCHA has said that the scaffolding will remain up until December 2023. It looks horrible.

*On June 29, 2022, a team from Asset & Capital Management visited Bay View Houses to speak with resident leadership and property management staff and provide an overview of capital projects, including the brickwork repairs. As noted at the site visit, though scaffolding was removed after repairs were completed in recent years at Bay View, new requirements from the NYC Department of Buildings for cavity wall construction inspections resulted in additional unsafe conditions being identified that must now be addressed. Most of the work will entail pinning to address deteriorated or missing ties, a process to ensure the stability of the façade. A detailed write up with addition information, as requested by the RA President, was shared in print and via email following the site visit.*

- A RAB member thinks bad contractors have been hired to make repairs at Bed Stuyvesant Houses. The ceiling is falling down, rain is pouring in, floors are cracking, there is mold and mildew, and nothing is getting repaired.

*We have followed-up with Property Management and Operation colleagues and plan to visit Bedford Stuyvesant Houses in late July. Ongoing capital projects are continuing even with the upcoming PACT conversion.*

- A RAB member stated that at Ingersoll Houses, staging areas for some construction projects are preventing others from beginning. Some projects – which were already delayed due to COVID-19 and were meant to begin in early April – have been delayed again. The delays to these projects affect seniors and youth at Ingersoll Houses. With summer approaching, NYCHA should be expediting this construction work.

*On June 28, 2022, a team from Asset & Capital Management visited Ingersoll Houses to speak with resident leadership and property management staff, see the issues firsthand, and provide an overview of capital projects. The construction team has been following up directly with the RA President and property staff, to address the issues and move the projects forward.*

- A RAB member stated that the fenced-off areas around Ingersoll Houses are not being cleaned properly by contractors, and now there is a huge rodent problem. These areas should be baited.

*Contractors are supposed to clean daily. This issue was addressed extensively during the June 28, 2022 site visit, and the project teams will ensure daily cleaning is completed by the general contractor and photographic evidence shared with the development staff daily.*

- A RAB member stated that construction on Bay View’s boiler plant was supposed to start in December, but it has not yet.

*Because Bay View is an LLC development and does not receive federal funding (only City and State), it does not appear as part of the “Federal Plan 2022-2026 by Development and Area”. There are a number of ongoing projects at Bay View – a heating project in procurement, a playground renovation project, trash hoist renovation project under construction, etc. Work is being done on the heating system/boilers. Looking at Capital Projects tracker on NYCHA’s website, the procurement should be completed this summer (delayed from former projected completion in March). It has been affected by delays in the vendor background check and the environmental review. It’s a large project – almost \$35 million, and is funded by several different sources. As promised during the June 29 site visit, the project team responsible for the heating project will present an update to resident leadership and property management staff this summer.*

- A RAB member asked: The “Federal Plan 2022 – 2026 by Development and Area” slide shows Douglass 1 – Fire Alarm. Why does it show the dollar amount under year 2026?

*The fire alarm money has been allocated in 2026 for project to start then. NYCHA has a certain amount of flexible federal capital funds each year – roughly \$250 to \$300 million – that has to be balanced between all of the different priorities, including some ongoing projects that need more funding and future projects. Because of prioritization of elevators, boilers, etc., fire alarms work is often pushed out into outer years of the plan. Starting this project sooner would mean pushing a different project out to start later. The prioritization of projects is based on the criteria discussed earlier – condition of properties, the funding source and any related requirements to fund specific types of work and trying to meet all requirements NYCHA has.*

- A RAB member wants to know what is planned for the upcoming phases of development for the recreational park at Sheepshead Bay (building 3023 Avenue X)? Capital has completed the kids' park, but a huge space still remains. I wish to have a basketball court put in to support the development's at-risk youth program.

*The majority of NYCHA's planned and allocated capital funding is tied to the "pillars" of the 2019 HUD Agreement, including lead, mold, pests, waste, etc. Many quality-of-life projects such as the kids' playgrounds are typically, generously, supported by local elected officials, such as City Council and State Assembly and Senate members. While at this time there is no funding allocated for additional improvements to the remaining open space/park area at Sheepshead Bay, this may be a proposal for your elected officials. If this is taken up by a funder, NYCHA can work with stakeholders on a preliminary scope and cost estimate for such work.*

### General

- A RAB member asked if NYCHA already has all of this money, why isn't NYCHA starting some of its planned projects until 2026?

*The "Federal Plan 2022 – 2026 by Development Area" shows money that NYCHA does not have yet but anticipates receiving. For example, the anticipated funds for 2022 should be received later this month or next month, and then we will receive funds around this time of year in 2023, 2024, 2025, and 2026. We're presenting to the RAB about these future funds, as this is part of the Annual Plan and is a HUD requirement, but we do not have those funds now.*

- A RAB member stated that if delays are anticipated in capital projects, a letter announcing and explaining the reasoning for these delays should be sent to the RAB and CCOP. This allows district presidents to pass on the information to the residents.

*As part of an effort to improve communication and partnerships with residents, a new unit within the Asset & Capital Management division has been formed to engage and provide regular updates (written and verbally) on capital projects happening at each development, including any changes to the schedule and what to expect. That unit has begun meeting with resident leaders this summer.*

- A RAB member asked how does the information presented to the RAB on 5/5/22 differ from the CCAP quarterly report issued December 31, 2021? In 2018 Mayor DeBlasio earmarked

\$2.2 billion for public housing upgrades in wake of the prosecutors at SDNY accusing NYCHA of covering up scandalous conditions. In looking at that report, it uncovered that 92% of 300 projects NYCHA intended to tackle with those funds haven't even begun. There are delays with regards to mold, lead, elevators, etc. There are eight active projects with major delays from 26-61 weeks. The document has not been released to residents; they have not discussed it. What is happening to the \$2.2 billion? How are RAB members supposed to compare FY23 Annual Plan and FY2022 Significant Amendment documents to what has just been presented to the RAB? If the RAB doesn't know what's going on, then other residents certainly don't know.

*The report you're referring to was drafted in January by our team for internal purposes and to meet the reporting requirement for NYCHA to draft a quarterly report on the City Capital Action Plan and the progress of the plan. The funding the former mayor provided was \$2.2 billion over 10 years, so \$250 million annually. NYCHA received the first tranche of funding in May 2021. We set aggressive project dates that we planned to move toward once we received funding, but due to internal challenges, COVID, issues procuring contractors, etc. many projects have been delayed. We try to be transparent in these reports about delays. Our most recent report shows improvement on several projects across the portfolio. We seek to remediate delays as much as possible. We have a remediation plan around that specific set of projects, and we're working on moving them forward so that within a few months we will see contracting complete and move towards construction and expending the funding.*

- A RAB member stated that it takes NYCHA 2-3 years to spend capital money, meanwhile renovations are going unchecked. They are not fulfilled or done properly.

*What is shown on the "Federal Plan 2022 – 2026 by Development and Area" slide is future money that NYCHA anticipates receiving each year. Capital Projects can come back at future meetings and present on active projects if helpful.*

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

### General

- A RAB member asked do residents' non-payment of rent and application for the ERAP program spur the conversion of developments from public housing to RAD/PACT?
- *Non-payment of rent is not one of the criteria we use when selecting a development for PACT.*

### Repairs and Spending

- A RAB member stated that it seems as if many of the repairs/updates at PACT/RAD developments are only cosmetic like bathroom fixtures, flooring, cabinets, etc., rather than fixes which would mitigate larger issues like old piping, mold, and lead. Who governs how much money is allocated, and whether or not every cent that is allocated is spent? If there is a balance remaining of the funds that are allocated, where does that money go? Residents should know how much money is allocated per apartment, and if there is remaining money, residents should have input on how it is spent.

*PACT delivers comprehensive upgrades to every development included in the PACT program, including significant investments to building systems, common areas, public spaces, apartments, community amenities, and security systems. PACT allows NYCHA to address underlying conditions within our buildings, such as leaks, mold, pests, and lead-based paint, that impact resident health and quality of life. This includes upgrading or replacing heat and hot water systems, electrical systems, elevators, and plumbing where needed. The building envelope, including the façade and roof, are also sealed and protected. Every apartment receives new floors, windows, kitchens, and bathrooms, and our contractors can also go behind walls to address the root causes of some of the issues described above.*

*In terms of the budget that is created for each project, NYCHA and our partners seek to maximize the amount of funding that can be invested, and we work closely with residents to develop a comprehensive rehabilitation plan that ensures this budget is used to address resident goals and priorities. NYCHA and our partners will sometimes report an average budget per unit, but this does not reflect the level of investment in each apartment; because it is an average, it includes apartment improvements in addition to investments in the wider development, including building systems, common spaces, grounds, and community amenities.*

- A RAB member asked how is cabinetry priced out for PACT/RAD apartment renovations? When NYCHA sends out the RFP, do you ask for builder grade, or do you specify a certain amount, and the bidder has to tell if will be builder grade? And does NYCHA have to accept the lowest bid?

*Through the PACT program, NYCHA is not required to select the lowest bidder. We work closely with resident leaders to select the PACT partners who are best suited to meet the needs of each community. Once a PACT partner team is selected, with resident leader participation, NYCHA requires the partner to work with resident leaders to develop plans for “mock-up units” that are completed across the property, which include material and finish options for the kitchens, bathrooms, lighting, windows, and floors, among other upgrades. The finish options are developed in consultation with resident leaders, and the partner will facilitate tours of the mock-up units for the wider resident community to solicit feedback on the quality of the workmanship and materials.*

- A RAB member stated that Hernandez Houses has already had many of the repairs that would happen in a PACT/RAD development. What would PACT/RAD then have to offer Hernandez? Not all developments have physical needs – the property management at Hernandez is horrendous. We also need new piping.

*Through PACT, NYCHA and our partners take a comprehensive approach to assessing each development’s needs. We identify developments that have the greatest need based on not only physical conditions but also operational challenges. While we have a general sense of the issues at each property, significant resident engagement, as well as additional building assessments and inspections, are required in order to determine what investments and management improvements can be made through the PACT program. Piping can also be replaced through PACT where needed based on further investigation.*

## Resident Engagement

- A RAB member thinks it would be interesting to revisit PACT/RAD developments that are a few years out in their conversion process to see what residents' criticisms are of the program and to get an earnest, honest reflection of the resident experience.

*Yes, we are happy to set up tours of PACT developments.*

- A RAB member asked is it possible to have some residents and TA presidents who are part of PACT/RAD Round 8, Round 9, and Round 10 on a Zoom call so that the RAB can ask them questions about the process, management companies, etc.?

*Yes, we can invite residents from these developments to future RAB meetings.*

- A RAB member stated that last year, the RAB discussed having a checklist or evaluation form which would enable residents to evaluate the effectiveness of their property management company. The evaluation form could be sent out to residents as a quarterly five-question survey in their rent statement. The RAB also discussed making the property management aware that they would be graded by TA presidents. Has that been implemented?

*We take the feedback from the RAB very seriously. In response to this recommendation, we are currently conducting a survey at Williamsburg and Harlem River to assess our partners' performance during the construction process, and we intend to roll out the survey at other developments in the near future. This survey will go to all developments that have had construction completed for over a year. Results from this survey will be shared with a third-party evaluator who will tabulate results and share them with NYCHA. Our goal is to share results of the post-construction survey with stakeholders including the RAB.*

- A RAB member thinks that NYCHA should share publicly and with residents the results of their PACT/RAD surveys, as well as other data which NYCHA receives from PACT/RAD developments. It is important that residents have this information. We need to know the reputation of these companies and know if they are following through on their promises to residents.

*NYCHA will take this under advisement and think more about how to share this information.*

- RAB members need to hear about the cons, as well as the pros, of PACT/RAD conversions. We want to meet with PACT/RAD residents that have been dealing with the new property management for two-to-three years. They have a better idea of the partnership.

*Yes, we can invite residents from these developments to future RAB meetings.*

- A RAB member inquired about the money allocated to each development, NYCHA takes out "miscellaneous costs". What comprises "miscellaneous costs"?

*There are many costs NYCHA incurs during the predevelopment process, and NYCHA gets repaid for these costs as part of the project budget. We can more accurately define these types of costs going forward.*

- A RAB member stated that NYCHA does not make clear how PACT/RAD conversions have already made a dent in its \$40 billion deficit.

*Through PACT, NYCHA anticipates comprehensively rehabilitating 62,00 apartments, or roughly one-third of its entire portfolio, by 2028. To date, the PACT program has unlocked approximately \$3.4 billion worth of investment at 58 developments (comprising 15,426 homes) where construction is either already complete or underway. There are an additional 75 developments comprising 19,733 apartments where NYCHA is in the planning and engagement stages of the PACT process, and where we expect to unlock another \$3.64 billion of investment. Without tools like PACT, which raise significant levels of funding for repairs that put our communities on sustainable financial footing, the capital needs of NYCHA properties will continue to grow.*

## **Operations & Management**

### Overtime

A RAB member thinks that the payment of overtime [shown in the 2021 Year-end Reforecast] does not reflect what residents see across the boroughs at their developments in terms of services and improvements. How can NYCHA's 2021 Year-end Reforecast show such high overtime costs for things such as Caretakers when developments are filthy? How can NYCHA's 2021 Year-end Reforecast show such high overtime costs for things such as heat when a large amount of NYCHA developments did not have heating during winter?

*The amounts shown on the reforecast are the actual costs incurred for employee overtime according to official payroll data. In 2021, NYCHA spent \$163.3 million total on overtime. With regards to overtime, NYCHA was proactive by having our Quality Assurance unit conduct an independent review of our overtime spending beginning in the summer of 2021. As a result of this review, multiple employees were disciplined for abusing overtime and procedural changes were made in 2022 to tighten up NYCHA's overtime procedures.*

### Inspections and Oversight

- A RAB member thinks that visits of the Compliance Department should be a surprise to the developments. Anticipated visits allow Property Management and staff to do quick fixes before the inspections occur.

*Compliance conducts a wide range of visits to properties to conduct inspections and the protocol for providing advanced notice will vary depending on the nature of the visit. For its On-Site Monitoring Program, Compliance will give the property staff two weeks advanced notice of its plans to visit the property. This is meant to mimic HUD's approach to REAC inspections, where HUD will give 3 to 4 weeks' notice to a property before a scheduled inspection. For other Compliance work related to an ongoing investigation or other visits to a property to inspect specific conditions, Compliance will frequently not provide any advanced notice to the property, based on the nature of the complaint.*



- A RAB member stated that some Supervisors of Caretakers cover up for Maintenance Workers who are not doing their work. If that mentality continues, new technology such as handhelds are not going to fix these issues.

*The Property Maintenance Supervisor (PMS) and Assistant Property Maintenance Supervisor (APMS) do check the work of Maintenance Workers by calling or visiting resident to spot check the work orders, monitoring the scheduled appointments for Maintenance workers, reviewing productivity reports, and conducting quality assurance on completed work.*

- A RAB member asked how often are Neighborhood Administrators checking each of their developments?

*Each Neighborhood Administrator (NA) should be on site each week. Under their current job descriptions, they are required to keep a continuous public presence on site. We are planning to further supplement the current job descriptions with additional requirements that will ensure each NA sees each of their developments each week. NAs will also be required to maintain regular meetings and contact with Resident Association presidents across their portfolio.*

- A RAB member wants to know how can NYCHA residents be asked to support the Blueprint or Transformation Plan when there is a lack of accountability in monitoring and keeping track of residents? As was seen in the news, a resident was deceased for nearly a year-and-a-half before she was found by NYCHA staff. It is unfortunately a common occurrence for elderly residents to pass away and not be retrieved from their apartment for many days.

*NYCHA is considering revising its policies on entering apartments when residents are not home to address critical repairs and other types of immediate dangers. We will include wellness checks as part of the policy to reduce the possibility of this happening again.*

*When people pass on, we need to treat them, the unit, and the family, with dignity, respect, compassion, and privacy. We also need to create a protocol for how we handle residents who have passed on.*

*That is part of the process change that will be generated from this issue. That process is already underway. If we knock on someone's door and they don't answer, we will leave a notice. If we then return a second time with no response, we're going to go into the unit. That is part of the process change that we have to do. But residents have to understand that this is going to impact them.*

#### General

- A RAB member asked has the PLA been signed?

*NYCHA's current PLA with the Building Construction Trades Council has been extended through December 2022 while the parties continue to negotiate a new PLA.*

- A RAB member inquired about Property Management's responsibility to residents when a large issue occurs such as a water main break? How are they supposed to assist residents in

getting water so that they can keep their bathrooms running, or to communicate with residents about this issue?

*One of the Agency's goals is to restore essential services as fast as possible and/or provide temporary essential services such as water to its residents in the event of a large-scale failure or interruption. Property Management is the point of contact in coordinating efforts when these types of incidents occur.*

*When an incident such as a water main break occurs during regular operating hours, Property Management creates an appropriate outage work order which triggers an automated call "robocall" as part of the normal notification process to affected residents. Property Management also posts the building with notification/informational flyers in a conspicuous area of affected building announcing the service interruption with [publicly] available details. The Property Maintenance Supervisor/Property Manager or designee contacts the Resident Association President and advises of the outage.*

*Whenever the disruption is for an essential [utility] service such as water and if it affects residents' entire apartment (ex., leaves them without potable water), temporary Water Stations are deployed at the development to provide potable water when possible. Residents are notified of such details, including where the Water Stations are placed, via posted notifications or subsequent robocalls. Residents would visit these Water Stations to collect water with their own suitable containers.*

*Property Management completes these actions while further assessing the incident and affecting repairs or working with other parties when needed to restore service(s). In the future, Property Management will be playing a larger role in communicating to residents what to do when these issues occur.*

- A RAB member inquired about Property Management's responsibility to residents in the instance of a gas outage? As a resident leader, it is hard to explain to other residents why it takes so long to resolve gas outages.

*Due to safety issues, gas service disruptions can take a long time to resolve. They must file for permits, they must wait for asbestos testing due to the need for core drilling, they must wait for a date for the gas-certified plumbers to come and do pipe work, etc. NYCHA is often at the mercy of other entities and needs permission to do the work.*

*In addition to the tasks above to restore gas service, Property Management's responsibility to residents in the instance of a gas outage is to provide hot plates (countertop appliance) as a temporary solution so that residents may still cook some meals and/or warm up their food. NYCHA Property Management conducts lobby meetings with residents of the affected building (s). The Property Maintenance Supervisor (PMS) and Property Manager (PMA) provide ongoing updates and estimated time of restoration. NYCHA will also work with Residents with special needs (i.e.: Seniors, adults and children with serious illnesses, families with active public assistance cases etc.) to provide access to meals while repairs are made and service is restored.*

- A RAB member asked what is an RMC?

*An RMC is a Resident Management Corporation that Resident Councils can form to enter into an agreement with the PHA to undertake specific management functions for a development in order to manage certain things at the development (such as janitorial responsibilities, resident engagement, maintenance, property management, etc.). This is included in 964 and in the Trust legislation. Residents are the only people who can choose to run and facilitate an RMC. Any RMC must be properly bonded, licensed and qualified to perform the management role it seeks to negotiate and contract with the PHA to perform. More information on RMCs can be found at 24 CFR 964.120 and 964.135.*

- A RAB member asked what are the infrastructure plans for developments that are over 55 years old and have bursting waste line pipes, out of date compactors, etc.? And what is being done about the removal of scaffolding that has been up for over five years with no work being done?

*As part of the 2019 HUD Agreement, the City committed to investing over \$2.2 billion dollars over ten years starting in 2021 for capital improvements to NYCHA properties, including waste management upgrades. As part of this funding, NYCHA will undertake waste yard redesigns and equipment replacement and upgrades, secondary waste stations for trash, recycling, and bulk waste, and interior compactor replacements at approximately 197 developments. Furthermore, the newly passed Public Housing Preservation Trust is expected to unlock billions of dollars in federal funding to accelerate repairs and make long-overdue capital investments in the buildings' infrastructure, for tens of thousands of NYCHA residents across all five boroughs.*

*In 2021, the Mayor's Office committed \$111M to support remove the longest standing sheds at NYCHA developments by funding the repairs for those buildings. While City funding cannot be used directly to address façade repairs, we NYCHA is using the \$111M to free up other funding sources so these can be used for façade repair work. Through the funding, repairs to 45 buildings with the oldest sidewalk sheds will be completed over the next three years.*

*Unfortunately, funding to complete brickwork and other façade repairs at NYCHA developments is extremely limited and stretched across many buildings due to the frequency of inspections and lack of sufficient, holistic investment in building's facades over the many decades. Residents frequently ask NYCHA to prioritize removal of sidewalk sheds and we have been working diligently with our City and HUD partners to identify additional funding streams to complete this important work at more developments, prioritizing developments with sheds up for the most years.*

- A RAB member thinks that NYCHA should create a better process for lead inspections, especially considering that people have to work. 96.4 Paragraph J states that a notice must be furnished to units in advance of "lead drill-out", but the full constitution states that residents cannot be under threat of "search and seizure" (meaning that people will not come into residents' homes without properly informing them).

*NYCHA has tested over 100,000 apartments for lead-based paint over the past three years. We have strived to give ample notice and to have personnel onsite available to coordinate lead testing with residents. We provide three notices in advance of testing: two weeks before, 5 days before, and then 48 hours before. NYCHA will continue to work to ensure it is providing notice and we want lead testing to be viewed positively by our residents and it is not intended to be an intrusive or bothersome process.*

### Individual Developments

- A RAB member stated that at Cassidy-Lafayette Houses, pendant lights in the lobby were broken by a contractor. These have not been replaced for months because they are too expensive to purchase with a credit card, but not expensive enough to be a capital expense. This item has been listed in all of the recent Resident/Management meetings, but nothing has been done.

*Upon review of the matter, development staff have been instructed to purchase new fixtures for one building and use the other diffusers to fill out the remaining ones that are missing.*

- A RAB member thinks painters are doing a terrible job painting at Red Hook East; they are painting doors while they're closed, such that they are sealed shut.

*NYCHA's Department of Planning recently oversaw vendor painting of common areas at Red Hook East. Apartment entrance doors are included in common areas painting. When painting apartment entrance doors if a resident is not home, we leave a small gap between the door and door frame to avoid creating a seal. At several apartments, the vendor did not adhere to this which created a sticking condition at several units. This required a little extra force to open the door which some residents perceived as being sealed. Upon learning this, we returned to the apartments to break the seal and directed the vendor to place additional caution about leaving the gap. No further occurrences were reported.*

- RAB members think dust wipes need to be conducted at vacant apartments at Gun Hill so that they may be occupied.

*NYCHA is doing much more than just performing dust wipes during turnover. Instead, NYCYA is fully testing apartments using XRF technology to identify lead paint and, if necessary, abate any lead paint to meet the new strict City standard. This work is highly important as it will provide new residents with a lead-free apartment. This process does take additional time and our newly established Healthy Homes Moveout Delivery Office is working to expedite faster lead testing and abatement.*

- A RAB member stated that Tenant Patrol is a big issue at Douglass Houses. The process needs to be open such that residents who want the jobs can get them. NYCHA should conduct an investigation into the Tenant Patrol at Douglass Houses.

*NYCHA takes all allegations seriously. An investigation was recently conducted by the Compliance Department and the allegations were unsubstantiated.*

- A RAB member stated that Frederick Douglass Houses Children's Aid Center is not currently serving Frederick Douglass residents or responding to our police officers.

*The property Manager reports that the Center is very involved and responsive to issues. He recently visited the Center and the director will produce information on the participation of children as well as the center's involvement in police events.*

- A RAB member stated that the basketball court at Douglass Houses needed to be repaired. Can residents do that themselves using rollover funds?

*Repairs to basketball courts are capital projects ranging in price from \$500K - \$ 1million and generally require 3 to 6 months of design and 3 to 12 months construction. Cost and schedule will vary depending on size of work and scope.*

- A RAB member asked if Howard Houses have its own dedicated plumbers?

*NYCHA does not currently have the funding to place a plumber at any particular development. The Neighborhood Model, however, is an attempt to have a group of skilled trades workers—including plumbers—dedicated to each specific neighborhood, thus ensuring better familiarity with the development and its equipment, as well ensuring closer physical proximity and shorter response times. Plumbing is undoubtedly one of NYCHA's greatest needs and the agency will continue to work to ensure sufficient plumber capacity and focus on systemic investments that can reduce the need for ongoing repairs.*

## **Community Service and Self-Sufficiency (Section 3, Resident Leadership)**

### Section 3

- A RAB member stated that there were many Section 3 958 complaints filed under the old rules. Under new rule, these complaints have gone to the wayside. If that is the case, when will the complainants be notified? Would the COO and NYCHA do so, or would HUD? The roles are confusing.

*Complaints alleging failure of compliance with Section 3 may be reported to the HUD program office responsible for the public housing financial assistance or the Section 3 project, or to the local HUD field office. These offices can be found through the HUD website, [www.hud.gov/](http://www.hud.gov/).*

*It is HUD's responsibility to inform the complainants of the status of their request.*

- A RAB member stated that since the PLA is not stopping Section 3, why aren't we having investigations into Section 3? Why aren't there business concerns in terms of legacy contracts? Why is the economic obstruction happening/impacting the community? Should residents make official reports about this to HUD in order to begin the needed investigation?

*Complaints alleging failure of compliance with Section 3 may be reported to the HUD program office responsible for the public housing financial assistance or the Section 3 project, or to the local HUD field office. These offices can be found through the HUD website, [www.hud.gov/](http://www.hud.gov/).*

- A RAB member commented that NYCHA’s lack of clarity around Section 3 reveals that its left hand does not know what the right hand is doing. For each topic area that NYCHA presents to the RAB, NYCHA should include information regarding how Section 3 is being included or considered.

*NYCHA will make sure to reference Section 3 in future presentations to the RAB.*

- A RAB member stated that NYCHA continues to speak about what it plans to do without incorporating or explaining its plans for how Section 3 will be involved. How will Section 3 be incorporated into the jobs that are mentioned as a part of the Transformation Plan?

*All of NYCHA’s job postings include the message, ‘NYCHA residents are encouraged to apply.’ Additionally, NYCHA Departments are encouraged to work with NYCHA’s Office of Resident Economic Empowerment & Sustainability (REES) to source NYCHA residents for their open job opportunities. REES distributes a bi-weekly e-newsletter which reaches all NYCHA residents who have an email on file and routinely features employment opportunities at government agencies and upcoming civil service exams. Residents may register their Section 3 interest online or RSVP directly for an event through NYCHA’s self-service portal (<http://opportunitynych.org/>). For the Skilled Trades and Maintenance staff being hired, NYCHA must work through the Civil Service system in order to hire for the skilled trade roles that are part of the Transformation Plan. NYCHA encourages residents to take civil service exams, get onto skilled trade lists, to work through unions, etc.*

#### Resident Leadership

- The RAB should be making recommendations for NYCHA’s operations, management, and budgetary practices as a part of the RAB’s standard process.

*Under HUD regulations at 24 CFR § 903.13(a)(1), The RAB’s role is “to assist and make recommendations regarding the development of the PHA Plan, and any significant amendment or modification to the PHA plan.” To the extent the PHA Plan includes information and updates about NYCHA’s operations, management, or budget, the RAB has a role in making recommendations.*

*In the recently passed state law creating the trust, the RAB will have a role in the selection of one of the resident members of the trust’s nine-member board. The law states that NYCHA’s CEO will appoint two residents to the trust’s board. For one of these resident board positions, the RAB will nominate two candidates, and NYCHA’s CEO must appoint one of these nominees to the board. These provisions are contained in section 628(2) of the trust legislation.*

*We will take under advisement the RAB’s suggestions about expanding its role.*

#### Committees

- RAB members had multiple comments related to the CCOP/DCOP committees and process. There has been no communication informing RA presidents that the CCOP districts are no longer districts but are now committees. Was this decision made in order to keep the CCOP from losing recognition, despite being down three seats? And can we opt out of CCOP (as

the committees are not mandatory, don't have much power, and can be dissolved at any time)?

*HUD only recognizes Resident Associations and CCOP (jurisdictional wide resident council). DCOPs do not exist under HUD regulations. They were formed by NYCHA to manage its size and population. Back in 2019, a letter was sent to HUD because one of the DCOPs refused to sign the funding agreement for their commercial card. That led to a larger question as to whether the DCOPs legitimately exist. HUD sent a letter saying "no", there can only be one jurisdictional-wide resident council, and NYCHA needs to identify that group and execute an MOU with them. In the letter, it stated that the DCOPs could only exist as a part of the CCOP – the only way to do this was as a committee. The CCOP wanted the DCOPs to still exist and as they cannot be their own separate jurisdiction, they would function as a committee in the same jurisdiction. [Technically the CCOP in 2020 was supposed to have been dissolved because they had not held elections in three years.] CCOP was allowed to continue to function as well as all as the DCOPs because they were working on their bylaws and to use HUD's technical assistance. In 2022, the CCOP sent an email to NYCHA that they refused to sign their bylaws. That ended HUD's technical assistance and exemption. This means they had to submit bylaws and have an election.*

*Every resident president is member of the CCOP and are eligible to vote in the CCOP election. To be on the board of CCOP you must be elected Chair of one to the 10 Districts. The power has been sent back to the Resident Association Presidents. You all will decide who will be your DCOPs and your CCOPS.*

- A RAB member inquired if DCOP is now a committee. What does that mean?

*The 24 CFR 964 regulations only permit the public housing authority to recognize local resident councils and a jurisdiction-wide resident council. The federal regulations do not allow for the DCOP body to be recognized as a resident council by a PHA. Since NYCHA has long recognized the DCOP, and the NYCHA resident body has become familiar with the DCOP, the CCOP has incorporated DCOPs into its organizational structure to assist the CCOP with its responsibilities. The DCOP can only act through the CCOP and exists for the benefit of the CCOP to assist the CCOP in performing its functions.*

- A RAB member asked is it true that the DCOPs, now called committees, cannot act independently of the CCOP? And do DCOP committees only exist so that the CCOP can exist/be elected? DCOP does more work than the CCOP. The DCOPs' work should be recognized on a federal level.

*Yes. DCOPs cannot act independently of the CCOP. The DCOPs are to assist the CCOP in accomplishing the goals and objectives of the CCOP and the local resident councils that the CCOP represent.*

## Voting and Representation

- A RAB member asked why should the DCOPs exist only to vote in the CCOP's executive board? CCOP doesn't even communicate with people.

*If the role of the DCOP is not effective in assisting the CCOP, then the CCOP bylaws must include a provision so that the CCOP bylaws may be amended and role of the DCOP either removed or changed so that it can better assist the DCOP.*

- A RAB member asked if you don't vote locally [for the DCOP executive board], can you just vote for the CCOP?

*Yes. If you don't want to vote for the DCOP, that's your choice. According to the bylaws, the DCOPs still exists. Those on the bylaws committee would have to change the bylaws to get rid of the DCOPs.*

- A RAB member asked If they are not a part of the [DCOP] committee, can they vote for the CCOP executive board members? Can they call HUD with requests as a CCOP member, without being on the CCOP executive board? Can they, as Tenant Leaders that are members of the CCOP and on the DCOP committees, make decisions without the CCOP?

*You cannot make a decision on behalf of CCOP, and any decision made should be communicated by the CCOP to the residents. If you read the bylaws, you can still make decisions in your district, on behalf of your district. You can run your districts as you do right now. The only difference is that you must report on what you're doing to the CCOP, and you do not have direct authority over any of the residents as a DCOP. Your authority is derived from the CCOP under which you operate. If CCOP requests that DCOP attend one event per quarter at a different development, DCOP must fulfill those requirements. But once you get your district budgets and make your plan for your district you all can start working.*

- RAB members asked about the election. What is the election process for the [CCOP? DCOP?]. Can an election be held without 30-day notification or without quorum? Can they just do whatever they want without adhering to bylaws because they're a committee?

*The election process requires a 30-day notice before nominations/elections. In the case of the most recent DCOP/CCOP elections, simultaneous notification of both the nomination and election was provided more than 30 days in advance. No, an election cannot be held without 30-day notification. The quorum rules do not apply. Given that the DCOP is a committee of the CCOP, the DCOP must adhere to the bylaws of the CCOP which went into effect on May 23, 2022.*

- A RAB member asked how can we expand the number of people on DCOP? There are not enough people that could really represent the residents.

*Each district committee, with advisement from CCOP, may seek to include additional executive board positions.*



## Communication

- A RAB member thinks that CCOPs should not have any input on what is occurring at people's developments. How can the CCOP advise what's happening at Red Hook Houses if the CCOP has no contact with anyone in those developments?

*Legally the CCOP cannot interfere in the RAB's local business. They can be invited into the RAB's local business, or they may need to intervene in the instance that something major happens.*

- A RAB member stated that they never hear from the CCOP. With the Blueprint, Trust, etc., there have been instances in which the CCOP has not been forthcoming about decisions they've made to Resident Leaders. Because of this, Resident Leaders feel defensive and don't want the CCOP to have power to make decisions for developments.

*Resident presidents either vote to get a new CCOP, or to keep the CCOP members that are desirable and get rid of the others. They can do this as Resident Association (RA) presidents – all RA presidents vote for the local DCOP and CCOP.*

## Section 8

- A RAB member stated that there should be a means of allowing Section 8 residents at large to participate and provide input on NYCHA initiatives. What is the possibility of starting a Section 8 Resident Advisory Board, something comparable to CCOP? The issues and concerns Section 8 residents face are different than public housing residents.

*NYCHA will take this recommendation under advisement.*

## **Safety & Crime Prevention**

- A RAB member stated that many residents are not even living in New York and are subletting their apartments. That is a security issue.

*Residents with knowledge of this happening should send an anonymous email to the Inspector General's Office so that it may be investigated.*

## Additional Comments

- A RAB member asked who is the federal Monitor working for?

*The federal Monitor has a services contract with the City of New York. The Monitor was installed to oversee the agreement between NYCHA, HUD, the City of New York, and the United States Attorney's Office for the Southern District of New York. The Monitor's team reports jointly reports to those three parties.*

- A RAB member asked how many emergency reserve housing vouchers does NYCHA have, or does the federal government allocate to NYCHA?

HUD has allocated 5,738 emergency housing vouchers (EHV) to NYCHA.

- A RAB member thinks that automated message for the CCC hotline needs to be simplified and shortened. As it is now, it takes residents twenty minutes to make a simple complaint about issues such as smoking in the building. Many residents do not have the time or the patience to listen to the message, and so may forego alerting NYCHA to issues they are facing.

*NYCHA is working with the CCC and with IT to change the script to ensure it is shorter and more direct.*

- A RAB member wants to know what is NYCHA doing about the air quality when construction for brickwork is happening at developments?

*There are dust control requirements in the general contractor's Safety Program and Plan submissions, which must be approved by NYCHA's independent Construction Safety & Quality unit. These are further enforced by the capital project teams during construction. There are several dust control requirements which can be shared, but two examples include the requirement to utilize HEPA vacuums during brick pointing and other façade dust producing activities and ensuring all building entrances (windows, vents, pipe sleeves, etc.) within 20 feet of the work area are covered. Air quality monitoring is also an area that our independent Environmental Health & Safety Unit within NYCHA's central Compliance function focuses on, including for capital projects.*

- A RAB member inquired what would happen if NYCHA went into receivership? The U.S. Department of Housing and Urban Development ("HUD") website includes the following summary of receiverships. A link to this material on HUD's website is here: [Receiverships | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#).

#### RECEIVERSHIPS:

- There are two basic types of receiverships: administrative and judicial. Administrative receiverships can be further divided into ordinary administrative receiverships, PHAs under Settlement Agreements, and PHAs under Cooperative Endeavor Agreements.
- Administrative Receivership is a process whereby HUD declares a PHA in substantial default of its Annual Contributions Contract and takes control of the PHA under the powers granted to the HUD Secretary under the Housing Act of 1937, as amended. HUD appoints one or more HUD staff to work on-site at the PHA and manage and operate the PHA's housing operations and conduct the affairs of the PHA. HUD provides oversight in a manner consistent with the statutory, regulatory, and contractual obligations of the PHA, and in accordance with additional terms and conditions as set forth by the Secretary.
- A PHA under a Settlement Agreement operates under a court-directed and approved agreement between HUD and the troubled PHA that defines the terms, conditions, and duration of the administrative receivership. A Settlement Agreement is accompanied by a court-approved Work Plan that lists specific tasks to be accomplished by the HUD receivership team.

- A PHA under a Cooperative Endeavor Agreement operates under a voluntary agreement between HUD and the troubled PHA or the local municipal government that defines the terms, conditions, and duration of the administrative receivership. A Cooperative Endeavor Agreement facilitates cooperation and coordination between the HUD receivership team and the local municipal government during the term of the receivership.
- Judicial receiverships are established, monitored and supervised by federal courts. A District Court appoints a receiver to conduct the affairs of the PHA in a manner consistent with statutory, regulatory, and contractual obligations of the PHA and in accordance with such additional terms and conditions that the court may provide and with Section 6(j)(3)(c) of the Housing Act of 1937, as amended.
- There are two public housing authorities under HUD administrative receivership.

Name	Locale	Start Date
Administrative		
Housing Authority of Alexander County	Cairo, IL	February 2016
Highland Park Housing Commission	Highland Park, MI	May 2021

- A RAB member asked: in the COO role, is Daniel Sherrod still representing residents, or he representing NYCHA? Why was he put in place in this role? And is he just representing public housing residents, or Section 8 as well?

*Mr. Sherrod is currently Special Advisor to the Chair/CEO for Operations. The current COO is Eva Trimble. In both his current role and his role as COO, Mr. Sherrod's role has been to ensure that NYCHA improves its operations, services to residents, and that NYCHA is data-driven, provides great customer service and social services to residents.*

#### Affirmatively Furthering Fair Housing (AFFH)

- A RAB member inquired about NYCHA's actions in furthering fair housing.

*Currently, PHAs are not required to submit an AFH. 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. Please see pages 195 through 198 of the Annual Plan for information on NYCHA's progress in its goal to "Promote Equal Opportunity in Housing".*

## **ATTACHMENT N**

### **COMMENTS AND CHALLENGED ELEMENTS FROM THE PUBLIC**

#### **Annual Plan**

- A resident of public housing rejects the Annual Plan due to various reasons. They are concerned that there is an increase of almost 100 million dollars between the capital fund grant noted in the Annual Plan versus the Significant Amendment. This is found on page 44. They do not trust NYCHA or believe that the financial estimate that they have provided can be trusted. There is another issue on page 20. NYCHA notes that 175 million will be used under the reimbursement to operate fee category. This significant fee is not found in the Annual Plan. This expenditure is not explained by NYCHA. And this is the biggest investment in the section on page 20. So NYCHA must explain what this fee will be used for before presenting it for adoption.

*The line item for \$175 million represents “Transfer to Operating – HUD” which allows Public Housing Authorities (PHAs) to transfer up to 25% of the capital fund grant (in this case \$700 million) to cover operating costs.*

- A resident of Stuyvesant Gardens totally rejects this annual plan significant amendment.

*NYCHA acknowledges this comment.*

#### **Eligibility / Admissions / Rent Determination**

- NYCHA needs to update and improve the entire system because it’s so outdated and continues to fail residents and future residents. The tenant selection process needs to be improved a computer selection has not benefitted anyone who has applied for NYCHA.

*The automated nature of apartment selections ensures that NYCHA adheres to fair housing practices in accordance with the Tenant Selection and Assignment Plan (TSAP). We are reviewing the current TSAP to identify possible areas for improvement.*

- A resident asked if there will be new rent prices? Will the rent remain income base for the elderly that have a set income, or will residents have to start looking for new homes?

*Rents will remain income based and will not be raised above 30% of adjusted gross income.*

#### **Capital Projects**

- A resident of Highbridge Gardens is concerned about the scaffolding that has been there for years that no one seems to come and inspect. They are also concerned about the brickwork.

*The sheds at Highbridge were installed in buildings 1,2,3,4,5 and 6 due to unsafe conditions in the brickwork. The scaffolding is inspected weekly by the contractors hired by NYCHA to maintain the scaffolding. There is 4,038 linear feet of scaffolding and the last inspection was on September 23, 2022. The scaffolding exists to protect the community from potential unsafe conditions identified by the NYC Department of Buildings (DOB). The repair work cannot proceed until funding is secured. NYCHA is working with our partners in government to identify funding sources to repair the brick and remove the scaffolding.*

### **Leased Housing (Section 8)**

- A Section 8 participant wants to know what NYCHA is doing with landlords who use loopholes to avoid renting to Section 8 voucher holders.

*It is illegal in New York City for an owner to refuse to rent to a person based on their lawful source of income. Lawful source of income includes many kinds of subsidies or assistance from federal, state, or local public sources such as Section 8. NYCHA provides Section 8 applicants, voucher holders and participants with information on how to report housing discrimination. If a Section 8 applicant, voucher holder or participant believes they have been discriminated against, they can call 311 and ask for the NYC Commission on Human Rights or call the Commission's hotline directly at 718-722-3131. Complaints of lawful source of income discrimination can also be reported to the New York State Division of Human Rights' toll-free HOTLINE at 1 (888) 392-3644*

### **Security and Safety**

- A resident of Breukelen Houses is concerned about gun violence. The community center needs repairs. It doesn't have a lot of programs for the kids to keep them off the streets. There's only one program at a time. There are not a lot of things for the seniors to do.

*The Management staff has recently addressed several repairs at the community center in August and September 2022. Staff are following up on the remaining open work orders to ensure their timely completion.*

*The Office of Safety and Security is partnering with the NYPD to increase the number of directed patrols throughout the development. In addition, NYCHA is in the process of developing a Security Plan individualized for each development. The Office of Safety and Security currently conducts weekly Active Shooter training for employees due to the increase in gun violence. The training will eventually be expanded to include a virtual Active Shooter presentation that discusses preplanning during and post incident.*

- A resident of Clinton Houses wants to know why some buildings have cameras and other do not. There was a fire incident in May 2021 in the staircase and the development still does not have cameras. They have no intercoms. There are also issues with security with the homeless people in the building.

*The Clinton Houses development consists of eight buildings. Four of the eight buildings have cameras for a total of 28 cameras. Funding for cameras usually comes from elected officials. Once funds are obtained, the development management staff, the Office of Safety and*

*Security CCTV Unit, and the NYPD collaborate to identify the key locations for camera placement based on issues in specific areas.*

- A resident of Redfern Houses asked how will our homes be safe?

*NYCHA is partnering with the NYPD to increase the number of directed patrols throughout the development. To combat the homeless condition, a joint operation between NYCHA and the Department of Homeless Services (DHS) will be conducted periodically throughout the year.*

### **Pest Control**

- A resident wants to know who can regulate the rodent and insect problems. Why does it take so long to cut the grass?

*When a resident calls in a complaint the neighborhood planners schedule the work order and then the exterminator responds. On the day of the appointment, NYCHA staff will inspect the apartment. If needed, the exterminator will use a pest control method called Integrated Pest Management (IPM), which involves sealing holes with metal mesh, cleaning up pest droppings using a vacuum, and placing gels in cabinets and around baseboards. NYCHA tries to determine why the pest is getting into the home to address the issue. We use a spray product that stops roaches from reproducing or growing. The exterminator also gives a flyer to the resident about how to keep their apartment pest free. All of this will help us reduce pests.*

### **Property Management / Operations**

#### **Bronx**

- A resident of Mitchel Houses stated that there are several issues at the development: people sleeping in the stairwells, NYCHA Maintenance staff standing in front of the building smoking a cigarette, elevators never working, apartments needing repairs, but the tickets are closed before the work is done.

*Development Management is aware of the situation with homeless individuals and report their presence to Police Service Area 7. Management reiterated NYCHA's smoking policy to staff and provided the policy to development employees on September 20, 2022. Employees were made aware of the consequences of violating the policy. As of September 20, 2022, all elevators are operational except for the A car of 225 Willis Avenue. A work order was created and addressed by the Elevator Department. As it pertains to work orders, they are closed when repairs are completed, are unfounded or sequenced to skilled trades. For the sequenced work orders, the Maintenance workers will issue a slip with the name and phone number of the Neighborhood Planner or Secretary for scheduling based on the resident's availability.*

## Brooklyn

- Cooper Park residents expressed concern about various issues: slow responses to emergency issues like broken water lines, inadequate maintenance of trees, homeless moving into our halls and stairwells and the poor-quality office space for the Resident Council, which deserve more attention from NYCHA and should be prioritized in the Annual Plan for FY 2023.
- This summer the development has had at least two water main breaks which left residents in several buildings (60, 275, 295 and 330) without access to water for over 24 hours. This is unacceptable to us and should be to you.

*Cooper Park has not had any recent water main breaks. However, the development has had planned hot water outages for the third-party heat vendor G.S Hall to address repairs needed in the boiler and tank rooms. In those cases where hot water is impacted, residents are notified at minimum 24-to-48-hour notice and still have access to cold water.*

Trees are a valuable resource that can mitigate heat by providing shade. Trees have been removed and need to be replaced. They also need pruning. There is a tree that has exposed tree roots, which have broken through the sidewalk (between Kingsland Avenue/Jackson Street) making that area a fall hazard to all residents especially our elderly residents.

*The development staff is aware of the need for the tree pruning and has been working on procuring a vendor to do the work. Management has reached out for a proposal and is waiting a date for the survey to be done.*

The Council's office space is another issue. The office is in the basement of one of the buildings and is often flooded with waste materials from the above apartment. There's a ceiling leak in the bathroom and questionable odors drifting into the office from the compactor room. Due to horrific odors emanating from the floods and compactor room, there are times that the council must leave the office and cancel meals that they distribute daily to our residents. There's a lack of storage and space for the Council's planned activities or to hold its General Monthly Meetings. While the time frame for certain planned activities and meetings are held at the community center, the council is allocated time and space based on the availability of the center. Due to these ongoing issues, the Council is being stunted in its ability to perform our responsibility to our residents. The Council believes that the ideal solution is to move the office into the abandoned Cooper Park Child Care Center (located at 292 Frost Street, Brooklyn, NY 11222).

*The Resident Council has expressed an interest in taking over the vacant childcare center. The Development staff has notified NYCHA's Real Estate Department and has informed the RA president of this action. Management is still awaiting decision and will notify the Council once they have an update.*

With the removal of encampments beneath the Brooklyn Queens Expressway (BQE) underpass, homeless people have relocated to our hallways and stairwells causing a quality-of-life issue for our residents. The council would like to see the installation of better secure locks on our lobby and back doors which would serve as an improved preventive measure to unwanted intruders.

*When the development staff encounter the homeless in the building or find illegal activity or loitering, they contact the 94 Precinct immediately to assist and address the issue. Residents has also been encouraged to notify the police if they notice any homeless or suspicious activity in the buildings. The residents are reminded at the Resident Association meetings to not leave branches, bottles, bottle tops or any other debris in the doorways to stop unauthorized persons trying to enter the buildings.*

The council expressed additional concerns regarding the Trust's ability to take out loans and generate private debt because of those loans, what happens if the Trust defaults on the loans. They are also concerned about RAD/PACT, the higher eviction rare with private developers, the lack of transparency on the money generated from infill projects and how NYCHA is holding private developers accountable when they are not doing the renovations or repairs properly.

*Please see NYCHA's response to the comments on the Housing Preservation Trust.*

- A resident of Farragut Houses stated that the water is dirty and would like to know what is being done to clean up the running water. They are also concerned about rodents' problems because the trash chutes are nailed at least two times per month.

*The development recently had roof tank cleaning which caused brown water to come out momentarily through the faucets when water service was restored. The residents have all been instructed to run water when the water service is restored prior to usage. The Property Manager also visited the apartment of the resident and was advised that the brownish water had stopped. Pest Control is active at this location and regular assessments and treatments are made for vermin. Management staff found the complaint of trash chutes being nailed shut twice a month to be unfounded. The only time a hopper will be shut is due to malfunction and residents are instructed to take their trash outside.*

- A resident of Reverend Brown Houses expressed that NYCHA does not provide proper heating for seniors. Even the new boilers don't work. There are no programs to address gun violence.

*The development staff followed up with the resident and found no issues with the heat. Staff found that seniors do generate work orders but when the heating plan technician (HPT) responds, the apartment has the proper readings. In some cases, the HPT even finds the window open upon responding.*

*The Office of Safety & Security is partnering with the NYPD to increase the number of directed patrols throughout the development. In addition, NYCHA is in the process of developing a Security Plan individualized for each development. The Office of Safety and Security currently conducts weekly Active Shooter training for employees due to the increase in gun violence. The training will eventually be expanded to include a virtual Active Shooter presentation that discusses preplanning during and post incident.*



## Manhattan

- A resident of Douglass Houses expressed concern about issues that need to be addressed at the development such as the elevators broken down every day, extermination especially mice, leaks, and mold issues. Another issue is that NYCHA has recently installed heat pumps in the building and the work in the unit created so much dust that residents had to go out for a while. There needs to be better communication from NYCHA on how things like this might affect our day to day lives and building maintenance needs to do a better job cleaning up after they do work. Although the heat pumps are great, they should prioritize fixing other issues in the units.

*The elevators at Douglass require a lot of maintenance work and there are also issues with vandalism and residents using elevator keys. The development is working on the preventive maintenance to reduce outages. Property Management is having staff perform the various repairs especially mold and leaks on evening and weekends when more residents are home. There are issues with rats due to construction work around the development. Property Management is following up to increase the treatment. The HVAC unit is being installed in each apartment at 830 Amsterdam as part of a pilot program funded by the New York Power Authority. Property Management will follow-up with the vendor on the importance of mitigating the dust when installing the units.*

A resident of Dyckman Houses expressed concern about various issues at the development:

- Pest and waste management needs to be improved, specifically for rats. The incinerator system in the building is not being properly utilized and is ineffective for the disposal of waste. Instead, trash ends up on the street. As a result, and because the building is connected to the senior center, there are a lot of rats in and around the building.
- Waste needs to be properly containerized at all stages, including on the street, to prevent exposure to rats.
- Simplify the process for occupancy and succession rights of family members.
- Bring back tenant patrol. There are many people in the building who are not residents and are loitering and/or playing in the halls. As a result, packages have been taken.
- Mold remediation needs to be improved across NYCHA developments.

*Property Management staff continue to educate residents in proper trash disposal like utilizing the hopper chutes instead of disposing of waste and debris on development grounds. They are aggressively addressing exterminator issues and are requesting weekly treatments to try to control the infestation. The development has normal waste receptacles by the buildings and throughout the property. Containers are not placed in order to reduce illegal dumping. Garbage and debris are removed daily as needed.*

*As it pertains to occupancy issues, property management will post notices in buildings outlining the succession process for residents. The Resident Association is very active and has patrols, floor captains, etc. They report all illegal and questionable activities to development staff who in turn report it to the Office of Safety and Security and the Neighborhood Coordination Officers (NCOs).*

*The development is also addressing aging mold repairs through work order blitzes and is creating a plan to better handle the volume of work orders.*

- A resident of Grant Houses is concerned about the cameras inside and outside the building that are not working. There have been various incidents at the development. There are roaches in many apartments and pest control is needed. NYCHA should take resident complaints more seriously.

*The cameras belong to the Police Department who are responsible for their maintenance. As it pertains to the pest issues, residents are encouraged to make work orders for extermination and those will be scheduled by the Planning Unit. Rat reduction teams are also at this location every week to address rodent issues.*

- Another resident of Grant Houses is concerned about maintenance issues that take a long time to address. NYCHA needed to redo the flooring on the stairways and wash the walls. The walls need to be repainted, but the paint NYCHA uses has strong chemical smells and is uncomfortable for residents with asthma. The main door in the building keeps breaking. They replace the locks on the door, but don't tell residents, so residents must get key replacements. Finally, NYCHA has stopped giving money for the garden and other community operations that are beneficial to our well-being.

*As of September 2022, the public space corridors have been striped and waxed in all buildings. The development is also having all the staircases landings and steps painted through a contract. Development staff regularly repair the lobby door which are old and need constant repair due to vandalism issues. Residents are encouraged to visit NYCHA's website for information on community health programs.*

<https://www1.nyc.gov/site/nycha/residents/community-health.page>

- A resident of Johnson Houses is concerned that when repairs are requested, the staff do not come on time or at all. There are issues with the elevators being constantly out of order. There is a rat problem. Residents see traps and bait but do not think it is working as the rats are large. When it comes to maintenance issues like cutting off the hot water in a building, NYCHA should send a text message to all the tenants in that building so they know ahead of time what is going on. There needs to be better communication and awareness when it comes to maintenance.

*The development responds to the various issues as they are identified. When elevators are down, caretakers and their supervisors notify the Elevator division. Exterminators are on site every Wednesday to perform work. They fill the bait stations and treat rat burrows. The boilers have been operating normally during the summer; there was one planned outage for cleaning the roof tank.*

A resident of Rutgers Houses expressed concern about various issues at the development:

- Mold remediation and pest control needs to be improved.
- Elevator maintenance needs to be improved. This is a safety hazard for anyone experiencing a medical emergency, who would be unable to get out of the building

- quickly.
- Residents need more information about the decision-making process in the building and should be contacted through multiple methods, including phone calls, emails, door knocking, etc.
- Seniors especially need information about resources available to them because many of them are not aware and are missing out on essential resources.

*Work Order Reform which launches at all Manhattan developments in October 2022 will streamline the scheduling of skilled trades work and help address residents' needs in a timely manner. The Elevator Department responds to all elevator complaints. Residents are encouraged to inform the Property Manager, Superintendent and/or Assistant Superintendent of all elevator issues that have not been addressed.*

*The Property Manager and Superintendent work closely with the Resident Association President and RA Board members to keep residents abreast of issues regarding the development and to hear any quality-of-life concerns. The Property Manager will work with the RA President to seek out resources for seniors and make the information available in the RA office, Community Center and in the Management Office waiting room. The resource information will also be given the management staff to share with senior residents.*

### **Queens / Staten Island**

- A resident of Oceanside wants to know when will NYCHA start supervising the caretakers? We need to make sure that all buildings are kept clean without having tenants first complain about their work.

*Assigned supervisors are in the buildings to check compliance with janitorial operations. At times, the development receives resident complaints which are addressed immediately. There is an ongoing janitorial special initiative. The development will strip, wax and seal all the lobby floors. Building 1 was completed, building 2 is in progress, and all buildings will be completed before the holidays.*

- A resident of Mariner's Harbor stated that NYCHA should stop outsourcing jobs. NYCHA needs to hire and properly train people to do the jobs correctly.

*NYCHA needs a combination of resources, both in house and vendors, to be flexible and efficient to address the needs of our residents.*

- A resident stated that there is a degree of unprofessionalism at NYCHA. When a ticket is submitted and the Maintenance worker, plumber, or plasterer cannot come to the appointment, a simple phone call to the tenants in the morning will reduce the stress and frustration.

*Neighborhood Planners are responsible for calling residents when skilled trade appointments need to be rescheduled. Maintenance appointments should be rescheduled by the Property Management Office.*

- NYCHA needs to have a specialized representative to oversee the contracts of private jobs, to make sure they are done correctly.

*NYCHA's Quality Assurance Department bears some responsibility to make sure private vendors complete micro purchase repairs properly. Their team of inspectors and investigators are tasked with spot checking these vendors at developments during their regular course of inspections. During these checks, not only is the quality of work reviewed, but the qualifications of the workers is assessed. In addition, the department is working with Information Technology (IT) to develop a virtual logbook to help assist where and when micro purchase vendors are completing work on NYCHA properties.*

- NYCHA should supervise the behavior of some tenants (noise, parties, drunks).

*Residents can submit a complaint to their Management Office, Borough Management Office, or through the Customer Contact Center (CCC) at 718-707-7771 and NYCHA staff will investigate.*

*Borough Management Offices for Public Housing:*

- *Queens/Staten Island: 718-553-4700*
- *Bronx: 718-409-8626*
- *Brooklyn: 718-491-6967*
- *Manhattan: 917-206-3500*

## **Real Estate Development**

### **FHA Homes**

- A resident of the FHA Homes commented that the FHA residents have been neglected. They have been denied the opportunity to form a residents' association. Residents are dying off waiting for their homes. They are asking for a comprehensive program for the FHA residents. NYCHA wants the houses to become delapidated and uninhabitable and then throw the residents out.

*NYCHA actively works on the FHA portfolio. In the last two years, through a Request for Proposals process, we have sold 27 homes to two nonprofit organizations (14 homes to Restored Homes and 13 homes to Habitat for Humanity). These nonprofit organizations will renovate, or demolish and rebuild, the houses and then sell the houses at affordable prices. Additionally, since 2019, we've sold four homes to residents who live in FHA houses. NYCHA residents living in FHA homes can form a resident association if they desire. FHA residents attempted to do so a few years ago, but because the FHA homes are scattered throughout New York City, it was difficult for them to organize and have regular meetings.*

### **RAD/PACT**

- A resident is concerned about residents in the RAD transition during the COVID pandemic. Heads of households have passed away leaving occupants with no lease and recurring rent charges that they can't get help for because they are not on the lease. There is a lack of

clarification between NYCHA and new management. How does this plan address succession rights not just fixing repairs?

*In advance of signing the new lease required for the Project-Based Section 8 program, residents are encouraged to add family members to their household so have succession rights. To be added to the household, family members need to be eligible under public housing rules. During the lease signing process, residents can access a free PACT hotline through The Legal Aid Society for support through this process and submitting the required paperwork to NYCHA. Households can also add family members to their household after the conversion using this same hotline or by submitted information to NYCHA's Leased Housing Department.*

*Additionally, in 2020, NYCHA's Leased Housing Department created a PACT pilot program to provide a pathway to tenancy for any unauthorized occupants. To apply to the Pilot program, occupants must be in a unit that has no active tenant of record at the time of conversion. The occupant must be in an eligible familial category as it relates to the last tenant of record and must meet requirements for the Section 8 program.*

- A resident wants to know why they changed from regular NYCHA (public housing) to Section 8 voucher when the company Wavecrest took over?

*Wavecrest is the property manager for three different PACT projects. The different projects and conversion dates are listed below.*

<b>Project Name</b>	<b>Developments</b>	<b>Conversion Date</b>
Ocean Bay	Ocean Bay (Bayside)	December 2016
Betances	Betances I; Betances II, 9A; Betances II, 13; Betances II, 18; Betances III, 9A; Betances III, 13; Betances III, 18; Betances IV; Betances V; Betances VI	November 2018
Williamsburg	Williamsburg	December 2021

*Through PACT, properties are included in the federal Rental Assistance Demonstration (RAD) and convert to a more stable, federally funded program called Project-Based Section 8. Under RAD, residents change from Section 9 (public housing) leases to Section 8 leases. This allows NYCHA 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.*

- A resident leader at Frederick Samuel MHOP currently in the RAD/PACT transition is concerned that even though there was an announcement in February 2022 there have not been many updates about the next steps. The residents were given one week's notice to pack before movers were sent in. People are being moved to empty units for five days while there are floor renovations in their homes. There aren't any calls or notes about this. In addition, the buildings are filthy with rats, mice, and other rodents everywhere. Renovations are incomplete, causing holes which worsens the issues with pests. There aren't enough people available to clean the grounds, and they only do it once a week for all three buildings.

There needs to be better management and training to ensure the cleanliness and maintenance of facilities. The porters need to be trained as to how they maintain the buildings and grounds.

*NYCHA followed with the PACT Renaissance Collaborative (PRC) Partner team responsible for these properties and they provided the below response on the various issues raised.*

#### *Communication & Meetings*

*We constantly strive to improve resident communications while working to address 1) time-sensitive construction issues and 2) long-term property management challenges. Therefore, we schedule meetings with residents across the sixteen developments in the Manhattan Bundle on a quarterly basis. Since February 2022, we have scheduled two formal meetings with the MHOP Tenant Association Board (one meeting in March and an upcoming meeting in October). We have also shared PRC's Leadership's contact information with TA boards and encourage folks to reach out to us via phone call or text. In addition to correspondence with the MHOP TA board, we held a Resident Meeting in June 2022, during which we engaged in productive conversations with residents and received requests for PRC to refinish some apartment floors.*

#### *Construction Notices & Scheduling*

*PRC made accommodations to temporarily relocate tenants who wished to have work performed on their floors. The tenants in question were notified two weeks prior to construction. Residents are given thirty-day notices in the event of construction work on systems at the building-scale unless that work is an emergency. At MHOP, the assigned tenant liaison informed tenants of all schedule changes and helped them prepare for the upcoming renovations. The liaison works five days a week on-site and communicated with the Resident Association board on a weekly basis regarding changes in the schedule. Prior to flooring work kick-off, a survey was conducted with tenants, which gave them the option of cancelling the work or being relocated to another unit.*

#### *Pest Mitigation*

*Currently, all MHOP buildings receive (2) monthly treatments in the common areas and building exteriors. Baldwin Pest Control visits the buildings every 2nd Thursday and every 4th Friday of every month. They also make their round on such days to occupied units to exterminate the apartment of anyone who grants them access. There was a substantial influx of extermination requests from residents right around the time that in-unit renovations started. The requests have died down, but there have been rat burrows on the exterior, for which we have engaged Baldwin to perform special prevention treatments. The majority of the in-unit extermination requests have been for roaches and mice. We continue to monitor the presence of pests on an on-going basis and will 1) work with residents to procure greater access into occupied units as well as 2) target vacant units.*

#### *Building Maintenance Protocols*

*The MHOP developments are maintained regularly by our building staff, which includes three porters across seven buildings. We are currently down a porter and actively hiring for their replacement. Porter schedules are generated such that they overlap throughout the week. Porter #1 is scheduled on Sunday to Monday cycle, while Porter #2 is scheduled on a Friday to Saturday cycle. It is the responsibility of porters to sweep and mop common areas every other*

*day. Additionally, common areas and hallways are checked and spot-checked every day to ensure that small incidents are addressed. Garbage is sorted and bagged for pickup on Tuesday, Thursday, and Saturday. Our new Vice President of Operations will be responsible for oversight of building conditions and will monitor building maintenance in the fourth quarter of 2022 and going forward.*

- A council member provided testimony below various topics: lead testing; concerns about resident input in decision making; complaints received at Wise Towers regarding elevators issues, apartment repairs, cabling installation issues, voice mails left by residents not being responded to by the private company now managing the development, and issues with the parking lot vendor constantly contacting residents about the renewal of their parking spaces. This should be automatic. The council member also raised the issue of the Trust's ability to take on debt and other provisions in the legislation; the need for safety measures pertaining to ebikes; and the need to bridge the digital divide and provide access to affordable and reliable broadband to NYCHA residents. What is NYCHA currently doing to engage and assist residents in enrolling in the federal Affordable Connectivity Program (ACP)? Do residents of developments enrolled in the PACT/RAD programs meet the ACP public housing eligibility criteria?

*NYCHA followed with the PACT Renaissance Collaborative (PRC) Partner team responsible for Wise Towers and other properties. PRC stated that they constantly strive to improve resident communications while working to address 1) time-sensitive construction issues and 2) long-term property management challenges. Therefore, they schedule meetings with residents across the sixteen developments in the Manhattan Bundle (including Wise Towers) on a quarterly basis. Residents at Wise Towers received notices regarding elevator outages and PRC is aware of the cabling installation issues. The parking lot is maintained and managed by a third-party contractor, LAZ Parking. The PRC team is not responsible for the notifications that are sent to residents but will pass along this feedback.*

*On the topic of broadband, NYCHA has worked closely with the Mayor's Innovation & Technology Office to share information about the ACP program with residents.*

## **Relocation**

- A resident asked about the process for families that are displaced due to their apartment being deemed uninhabitable. What is NYCHA's plan to assist those families to have a temporary emergency place to stay? NYCHA needs to make sure that repairs are done in a timely manner so that a family's life (work and living arrangements) are not disrupted.

*Health hazards such as asbestos, mold, leaks, and lead require a temporary relocation to hospitality apartments or hotels. These relocations are generally for three days to two weeks, depending on the scale and complexity of the work being performed in their apartment. During that time, NYCHA will work with the family to make any special accommodations.*

- A resident commented about the process for seniors/elderly and disabled residents who are waiting for repairs to be done and who have no one to help them move their furniture.

These specific tenants are living in horrendous and inhumane conditions because of the lack of help.

*Unfortunately, there is not one organization that meets this need especially, free of charge. Seniors/elderly and disabled residents will often be referred to Family Partnerships Division (FPD) for additional support. FPD staff will assess the needs of the residents and explore what supports they may have to help move items (family, friends, neighbors, community members). They may refer to long term support services (i.e., APS, Home Care) should this concern be only a symptom and there are more root causes that can be addressed. FPD has also explored reaching out to local older adult services providers that may have a friendly visiting/volunteer program that can connect residents for assistance.*

*NYCHA does not have capacity to assist seniors/elderly and disabled residents with this issue on an ongoing basis. However, if the situation warrants the relocation of the family to a hotel or hospitality apartment to facilitate repairs, our Resident Relocation Services (RRS) can coordinate with Management to provide professional movers to move and store their furniture until the repairs are completed. Any cost associated with this move, will be at NYCHA's expense.*

## **Housing Preservation Trust**

### **Opposition to the Trust**

- A resident leader of Smith Houses stated that the Trust cannot happen. It will be detrimental to every resident in public housing.
- The Citywide Council of Presidents Chair does not support the Trust legislation. NYCHA needs to improve the process of moving current residents and placing new residents. There needs to be improvement for heat and hot water. NYCHA has been lax in keeping its properties up to HUD standards which lead to poor scores on the inspections. Elevator issues, poor lighting, extensive length of scaffolding at many developments require a better plan for replacement and repairs. With the increase in crime citywide, the CCTV system needs to be upgraded.
- A resident of 830 Amsterdam Avenue opposes the Trust primarily because of the use of NYCHA apartments as collateral in case the loan defaults. The minimum voting requirement should be set at 75 percent of residents. NYCHA needs to do a better job at fiscally talking about this plan.
- A resident of Mitchel Houses has expressed disappointment in the actions that NYCHA, under the leadership of Greg Russ, has undertaken over the last three years. Every report on privatization and conversion proves that NYCHA will displace tenants, that they will lose their homes and our community.
- A resident of Oceanside Houses commented that RAD, PACT and the Housing Preservation Trust are three programs that use investors to raise private money for NYCHA to make



repairs. Public housing will be run by private developers. Investors, private managers, and developers will want to increase rent where possible, and they are doing that right now at Ocean Bay. And in the case of the Housing Preservation Trust, if NYCHA fails to pay back its loans, investors will be able to revert our homes to market rate rents. None of the details of this are worked out with resident participation. They say no to the Trust.

- A resident of Claremont commented that the description of this comprehensive modernization plan is very dangerous. RAD, the Trust and the Modernization Plan must have the same plan for the relocation of the residents. If they don't have the same plan, you are going to have one tenant in Queens and another tenant in Staten Island, and nobody is going to be relocated back to their homes.
- A member of the public is against the Public Housing Preservation Trust because it endangers the homes, health, and safety of public housing residents. The Public Housing Preservation Trust legislation allows the Trust to issue bonds to finance renovations of up to 10 billion dollars of debt and 25,000 units are permitted to be transferred to the Trust. That's over \$200,000 in debt financing per unit. This debt financing is fiscally irresponsible and should not be permitted by HUD. Many households are behind in their rent due to the financial crisis from the pandemic. Under the Trust, residents will lose what they had in federal housing protections against evictions and rent increases. The alternative to the Trust is to listen to the residents. Rather than allowing the Trust to proceed, HUD should work directly with the residents and support resident management.
- A resident of West Side Urban Renewal (WSUR) 120 West 94th Street would like to understand the breakdown on the 25,000 units that will be allocated to the Trust. Will that be 5,000 units per borough allocated? What happens to the rest of the NYCHA portfolio that are not included in RAD, PACT or the Trust portfolios?
- A Section 8 resident commented that in reading the plan, there are several areas of confusion, lack of clarity and, more importantly, there are barriers that are currently in place that have stymied relationship building trust, between the residents and NYCHA. The concerns and need for clarification for the blueprint for change are: How is the blueprint Trust going to prevent mismanagement, neglect and/or corruption? How did NYCHA engage, educate and/or train the residents regarding the financials? For example, were the residents involved in the capital assessment needs decision? NYCHA is slated to receive 3.4 billion in capital funds from state fiscal year 2024 and 2.8 billion in operating funds to address the operating deficit of 300 million annually. Is this money going to be used as seed money for tenant associations to start an RMC, Resident Management Corporation, and/or Section 3 resident-owned businesses? How much of this money would be used to address the work order backlog? How are these proposals and/or projects communicated to all the residents? Would you consider putting this information on the reverse side of the rent statement and/or insert a page with bullet items of things to come and where one can find information on said topics? How is the Trust going to work and/or benefit the residents without falling into the hands of private investors? Who is going to protect the residents should it fall into foreclosure? If there are lease hold protections, please explain what they are and how they will work by monitoring, oversight, and enforcement. What is being used

as collateral?

- A resident of the Brownstones expressed their opposition to the Preservation Trust. The Trust will allow NYCHA to secure 10 billion dollars' worth of debt through bonds without any real protections against foreclosure. Given NYCHA's history of spending recklessly, unaccountable, even to the chair of the Housing Committee, why should they be allowed to take on so much debt? The Trust also comes with a Section 18 demolition clause. The Trust currently does not require a physical needs assessment to be done before a development is entered into this program. The new Board governing the Trust will only have four resident seats out of a total of nine, ensuring tenants never have any true decision-making power. Red flags have been associated with NYCHA for decades. We have a federal monitor that makes over 500 dollars an hour with no real power and no purpose under Section 8.
- A resident of Millbrook Houses rejects this Annual Plan Amendment because NYCHA did not adequately engage or educate our tenants. The blueprint plan repeatedly states that residents need to be more involved in the making decisions related to the capital assessment needs. This is not happening. The Significant Amendment was very difficult for the residents to understand. Residents don't understand the implications of this Significant plan. The Trust will have the authority to take on debt using our homes as collateral. The Trust legislation recently adopted up in Albany does not require an independent physical need assessment at each campus. This means we will have to vote on the Trust without understanding the physical reality that the developments face. It is imperative that NYCHA conduct a physical need assessment of each development before residents are asked to vote on the Trust. NYCHA needs to speak about how residents can be moved from their apartments from six months to five years, depending on the extent of the repairs that are needed in each unit. Is anything going to be put in writing to make sure that people get back in their homes after the completion of the unit being repaired?
- A resident of South Jamaica Houses is not in favor of this Trust. They are concerned about the engagement process with the residents. Residents are told their rights under 964 and Section 3 regulations will be maintained but they are not respected now under the federal government. Thousands of people are unemployed in public housing that could use those opportunities, but we have contractors coming into our communities with \$40, \$50, \$60 million contracts and not providing any training to the residents.
- A resident leader of Van Dyke stated that she did not understand the Trust. They remember Prospect Plaza when people were told people they would be able to come back. Those people never came back. There are issues with the Caretakers not doing what they are supposed to do. You can't train people on Zoom. They have to get a mop and a broom in person.
- A resident of Saint Nicholas Houses has several concerns about the Trust which is changing Section 9 to Section 8 and there are some ramifications. Someone from NYCHA should come to all the residents that are involved and explain all three categories: PACT, RAD, and the

Preservation Trust, because there is a vote and people can opt in or opt out. People would have a better understanding. They are also concerned about eBikes and how dangerous they are. NYCHA should find somewhere where they can be parked and be charged.

- A resident of Ravenswood Houses commented that the current plan and Trust will further privatize our public assets, specifically our homes. Public housing under Section 9 regulations has meant both housing stability and community. They have no doubt that we will experience homelessness if NYCHA follows through with this plan and with the Trust. Although NYCHA asserts that they are engaging residents, many still do not know what is happening and the implications. If residents are expected to vote on these plans, they must all be informed. 75 percent of tenants at each development are to agree on a solution before it is adopted by the entire complex, including the option to stay fully public under Section 9 with the fulfillment of the needed renovations. Each development should have been allowed to review the proposal and provide meaningful input. In the Significant Amendment, investments in each development fluctuate from zero dollars in some years to millions in the next. I disagree with this approach. I believe funds should be invested every year in every development.
- A resident of Saint Mary's Park Houses is appalled at how residents have been bullied into an attempt to believe that the Trust will benefit them without the full account that many residents may be in jeopardy of losing their homes. NYCHA has a history of late payments with accounts, with vendors and contractors, so what happens when a loan from the Trust is late on the payment to the investors? What happens when NYCHA is negligent? Who suffers from this kind of activity that they have continued throughout the years? What authority will take charge when NYCHA is in default on these loans? Will they discover that a proposal for demolition is brought to the table? The land is the true value of NYCHA's portfolio. We know that the buildings and the developments are in jeopardy, especially since NYCHA hasn't repaired roofs, pipes, electrical wires, etc. for over 40 years.
- A member of the Environmental Justice Initiative, the National Lawyers Guild and Justice Committee is concerned about the air quality around the area of September 11. Smith Houses has not been cleaned. They are in the World Trade Center dust sector and were hit by Hurricane Sandy. NYCHA has been approached regarding the dust exposure from the ongoing construction. The Trust is going to make things even worse because you are going to have less control over the managers that you are giving this land to. NYCHA should check before signing over management of these developments.
- A resident of Astoria Houses does not approve of the Trust Fund, the Preservation Trust, PACT, RAD, whatever name you want to call it. NYCHA should hear the residents' voices. This should be a two-way communication. Public housing needs to stay public. The residents don't want it private but if NYCHA wants it private, it's fine, but you need to bring it back to the people.
- A member of the public expressed their opposition to the Trust primarily because of the health impact due NYCHA's failure to inspect for lead, repair for leaks and mold, and maintain utilities such as heat in the winter. They also expressed extreme concern that the newly created, untested "Trust: will have the authority to take on debt and back that

debt with housing that it will get from NYCHA. Neither NYCHA or the State or the City will have the obligation to step in if the trust defaults and the creditors foreclose. This is a pathway to creditors owning what is currently public housing if this new untested trust is not able to keep up with its obligations. This pathway must be foreclosed. NYCHA must not transfer leasehold interests or any other kind of ownership to the trust as long as the law continues to give the Trust the authority to risk our homes as collateral for debt. The government should protect the most vulnerable in our society, not put them in the hands of greedy private interests.

- A resident of Saint Mary's opposes the Trust primarily because of NYCHA's history of mismanagement and the nature of the financial transactions. The resident also stated that NYCHA needed to finish the scaffolding, replace the roofs, and do some work on the brickwork. The resident stated that one of the buildings needed an accessible ramp and money had been allocated by former Assemblywoman Vanessa L Gibson (now Borough President), but they still don't have the ramp.
- A resident of 830 Amsterdam Avenue opposed the Trust and the fact that it uses NYCHA as collateral in case of loan default. There should be a "minimum" voting quorum of 75% of the residents. In case of default, will New York State and New York City "cure" the default and stop the foreclose? They felt that NYCHA and HUD aren't totally truthful with the residents, when they stated that we will have the same and full protections of the 964 regulations under the Trust. They also reject this plan because residents will still be "managed by the old Management Company NYCHA who still can't give us any repairs or clean our buildings."

A member of the public provided the statement below opposing the Trust and the Annual Plan and Significant Amendment due to various issues:

- Members of the RAB are already represented in other governing bodies within NYCHA. They want more diversity of opinions as individuals in these roles have been supporting conversions into privatization via RAD / PACT and the Blueprint Trust.
- Each development should be briefed on all options: privatization via Section 8, fighting for funding from Congress with Save Section 9, or joining the Trust. They demand that 75% of tenants at each complex agree on one solution before it is adopted by the entire complex.
- There is no easily accessible capital-fund five-year action plan on the original draft plan.
- There is an increase of almost \$100,000,000 between the capital fund grant noted in the annual plan vs the significant amendment. You'll find this oversight on page 44 of the annual plan. I do not trust NYCHA nor believe the financial estimates can be trusted.
- NYCHA notes \$175,000,000 will be used under the "reimbursement to operate" fee category. This expenditure is not explained by NYCHA. This is the biggest investment in this section on page 20 of the significant amendment. NYCHA must explain what this fee will be used for before presenting it for adoption.
- NYCHA did not adequately engage or educate tenants on their financial plans.
- NYCHA has not clarified what "relocation funds" will be used for. NYCHA has allocated \$4,000,000 between FY 2023 and FY 2026.
- The plan does not adjust the budgets proposed for inflation.

- NYCHA is limiting access to the federal Family Self-Sufficiency (FSS) program. The federal Family Self-Sufficiency (FSS) program provides an important way for public housing residents to save money without increasing their rent, but only 1,274 NYCHA Section 8 residents currently participate in the program.
- The "Trust" will have the authority to take on debt while using our homes as collateral.
- The legislation adopted in Albany does not clarify how our Section 9 and human rights will be upheld in the election process.
- The Trust legislation recently adopted in Albany does not require an independent physical needs assessment of each campus.
- NYCHA must inform tenants on the bond financing expectations facing their development. Tenants should have an opportunity to review this before voting on the Trust.
- A Section 8 resident expressed their opposition and characterized the Public Housing Preservation Trust as a “a debt-financing scheme”. They feel that the trust will end public housing as we know it and that it will not be accountable to public housing residents. They are concerned that the new board governing the Trust will only feature four resident seats out of nine ensuring residents never have true decision power. They were concerned that the Trust will take on debt and back that debt with housing that it will get from NYCHA. Neither NYCHA or the State or the City will have the obligation to step in if the trust defaults and the creditors foreclose. They want NYCHA to adhere closely to the rule that no properties will be transferred without a resident vote. They felt that residents should get an independent physical needs assessment of their development before they vote.
- A member of the public expressed their opposition to the Trust and shared similar concerns over the ability to take on debt, the need to empower residents through the voting process, and the need for an independent physical needs assessment of their development before they vote.
- A member of the public expressed their opposition to the Trust as a tool for privatization of public housing. They “don't trust The Trust”.

A resident of a senior building pointed out that residents are experiencing “trepidation, anxiety, fear, and an enormous amount of distrust.” NYCHA has residents on the NYCHA Board of Directors, but these are NYCHA's chosen residents. NYCHA should allow residents to select an advocate and perhaps an organization like the ACLU acting as an advisor to the tenants, to choose someone they trust to represent their interests. If the advocate makes a recommendation to the tenants, it might be more trusted than a recommendation coming from NYCHA. The resident also stated that without credibility, one can't even begin to have a discussion.

- A resident of Ravenswood rejects and opposes the Annual Plan because it does not address the gross mismanagement and lack of effective supervision of NYCHA properties, as well as the lack of enforcement of existing regulations and policies that affect the quality of life among the tenants. NYCHA needs to do a better orientation of new residents, so they learn responsibilities. Issues such as loud music, broken doors, and garbage in halls and on staircases are common. In addition, the plan does not address the longstanding issues of mold and the inferior quality of windows along with an intercom system that is not

functional. Management passively allows tenants to owe large sums of back rent while rent paying tenants face higher rents and no adjustments to lower even when they make less money. Staff shortages are addressed by reassigning a reduced staff of maintenance workers to cover additional buildings and grounds without addressing the demand for adequate numbers of staff to manage the workload. Contracted work is not supervised on-site, and all the promises of each new plan are quickly forgotten. We must remain Section 9 because NYCHA is the only truly affordable housing in a shrinking market of places for low- and middle-income working-class people and vulnerable populations such as veterans and seniors. Cosmetic changes, false promises of improvements, and selling bonds that leverage conditional financial support is a high risk move that makes us vulnerable to future changes focused on profit and loss.

- The United Front against Displacement who represent the residents of Manhattanville and the Jackie Robinson Houses oppose the privatization of NYCHA and shared their opposition with city leaders, elected politicians, and Union Representatives. The Trust is still privatization. Residents should be stakeholders as well and should be able to buy their apartments.
- A resident of Campos Plaza stated their opposition to the Preservation Trust. The Trust legislation is dangerous as written, especially because it does not protect units from transfer into private ownership in the event of default. This is just one of several dealbreakers in the legislation that make the Trust unacceptable.
- A resident stated that the Trust is risky and that NYCHA has made poor business decisions.

#### General Questions on Housing Preservation Trust

- A resident of Oceanside in Far Rockaway commented that the Trust is supposed to let residents speak and be heard but what is NYCHA doing with what's being heard? NYCHA needs to build a culture of trust where you have working groups, not go in the back room, make all these plans, and then come out and say this is it. NYCHA also stated that with the Trust, the same workers would be brought over. Are they the same workers who do not mop and clean? Is it going to be same way under the Trust?
- A NYCHA resident expressed concern over the scheduling of the Public Hearing which coincided with a RAD Town Hall. As it pertains to the Trust, they would like to understand its role within NYCHA. Going forward, will the residents be able to vote on either the Trust or RAD or whatever else? NYCHA needs to ensure that residents understand how this will be done.
- A resident of Rangel House stated the buildings are getting in worse conditions. They are asking NYCHA to sit and talk with the residents, present their ideas to the residents and allow the residents to present our ideas on the Trust and RAD. The residents need to sit at the tables with the CEOs and financial backers and say what we want.

- A resident inquired about the Trust: when they would be moving, what happens to their mail in the process, when will they return to their apartment and who would assist with the move.
- A resident stated that once management is transferred to private companies, there's no appeal to the government if promises are not kept. A resident would not be able to sue \$50 billion Related Company successfully if it comes to that.
- A resident asked what happens if the majority of residents in a particular development decides not to join RAD/PACT or the Trust but to keep the “status quo”, what financial support would that development receive?
- A resident wants to know who will ensure that the landlords and Management Office will commence repairs in Section 8 apartments?
- A resident asked since there are only 25,000 units allocated for Trust status, will the allocation be 5,000 units allocated for each borough? What happens to the rest of NYCHA 's portfolio that are not included in the RAD, PACT or Trust Portfolio's?

#### Support for the Trust / RAD

- A resident of Elliott Houses expressed support for the Housing Preservation Trust and the PACT/RAD conversion process. They consider Greg Russ to be a hero. They were involved in the committee for the PACT conversion and they picked the management company. It's a good thing for everyone. This was the best thing that could ever have happened to this development. It's been a great experience.
- A member of the public expressed their support of the Trust because there is no funding at NYCHA now. The Trust will fix all the developments in a safe workplace.
- A resident of La Guardia Houses and Section 3 worker for Local 79 expressed support for the Trust and they believe it will bring a lot of work to the community.
- A resident of Stanley Isaac Houses expressed their support for the NYCHA Preservation Trust and hope other residents can see the value of this innovative initiative. The newly created Preservation Trust is the solution to bring about long overdue repairs without any more additional cost to the taxpayers. The Preservation Trust also creates a pathway for our neighbors to be able to enter unionized, well-paying jobs. The Project Labor Agreement that is part of the Preservation Trust sets strong wage, safety and labor standards for construction workers who need higher wages and access to quality healthcare. They also support the Trust because residents have control over how they want the authority to rehabilitate our homes. Residents can either remain in the traditional NYCHA program, enter the Preservation Trust, or enter a public-private partnership known as the PAC/RAD. They hope that their fellow neighbors join them in supporting the Preservation Trust.

- Members of the local unions expressed their support for the Trust because they also believe that it has the solution for long overdue repairs which will also create good paying jobs. They also expressed that with the Trust, residents will have control over how they want the authority to rehabilitate their homes.
- A resident stated that the disrespect of Trust advocates should not be allowed. Others have silenced those who understand the Trust and want it.

*The following constitutes NYCHA's response to all the comments pertaining to the Housing Preservation Trust.*

*On June 16, Governor Kathy Hochul signed new legislation S.9409-A /A.7805-D establishing the New York City Public Housing Preservation Trust and paving the way for the overdue repair, rehabilitation, and modernization of 25,000 apartments under control of the New York City Housing Authority (NYCHA).*

*The Public Housing Preservation Trust will be a new State-created public entity like the School Construction Authority. The Trust will keep rents capped at 30% of income, preserve all resident rights and protections, fix residents' homes through capital repairs, and maintain a public workforce. Resident voices are a critical part of the Trust – from resident representation on the publicly appointed nine-member board to resident partnership during renovation projects.*

### ***Why NYCHA Needs the Trust***

*NYCHA needs over \$40 billion to fully restore and renovate all its buildings, but the federal government has provided only a fraction of the funding needed for these improvements. Many of the conditions in NYCHA buildings are unacceptable and unsafe for residents and their families – renovations are long overdue.*

*The Trust is a critical tool because it can:*

- *Access far more funding from the federal government.*
- *Complete faster, higher-quality renovations with improved procurement rules.*

### ***How The Trust Works***

*The Trust is 100% public. NYCHA owns, controls, and manages the property, and there is no private manager.*

- *NYCHA remains permanent owner of the land/buildings and enters into a long-term ground lease with the Trust to secure Tenant Protection Vouchers, a subsidy worth double NYCHA's current federal subsidy.*
- *Similar to how other government entities raise revenue for capital improvements, the Trust will issue bonds that fund comprehensive building renovations (with input and partnership from residents at the development).*



- *The Trust can hire better vendors who can complete high-quality work, faster.*

*NYCHA staff will continue to manage the properties under the arrangement with the Trust.*

*The Trust will keep homes permanently affordable and preserve all resident rights and protections. These protections align with current public housing rights and are stronger than in the traditional Section 8 program:*

- *Continue to pay 30% of income towards rent*
- *Continue to have full “Part 964” resident participation rights (including the right to organize)*
- *Continue to have all succession rights*
- *Continue to be restricted to low-income residents and continue to fill vacant apartments from the NYCHA waitlists*
- *Embed all rights, affordability, and use restrictions in the land and codify those protections cannot be changed and buildings cannot become market rate*

***State law prohibits pledging the fee ownership of the properties as collateral. Please also note that it is further codified in State law that low-income rights, protections, and rents must remain in place on these properties. Under no scenario can the buildings be sold, become market rate, or have the resident rights or protections changed.***

*The Trust legislation also includes provisions obligating the Trust to negotiate with any Resident Management Corporations (RMCs) that form.*

*In addition, the vouchers are project-based and tied to the apartment, so the property does not lose funding. The subsidy is provided by the federal government and far more stable than NYCHA’s current subsidy. If someone moves out of the development, with or without continued assistance, it does not affect the subsidy tied to the apartment.*

*In the case that residents need to be relocated, NYCHA will pay for all moving expenses to provided units, and residents will have the right to return to their property.*

*The benefit of the Trust is the ability for NYCHA developments to secure additional subsidies from Section 8 Tenant Protection Vouchers, while maintaining the tenant protections and public ownership codified into law. **The Trust is a 100 percent public entity.** Developments under the Trust will continue to be owned, controlled, and managed by NYCHA; however, their funding will come from a source that is roughly double the subsidy NYCHA currently receives.*

*As part of the law, developments will have the opportunity to vote on opting into the Trust. Currently, there is a cap of 25,000 units that may be converted over to the Trust. NYCHA is currently in the process of developing draft voting process requirements around this opt-in process, in accordance with the state law. As the law was recently passed and signed into law in June of 2022, there is not yet a breakdown or sequence of developments or units.*

*Finally, the \$10 billion debt limit outlined under the law is a cap and should not be viewed as an estimate of per unit bond financing. The actual amount financed per unit will depend on the specific development. The Trust will not overborrow – the bond financing will be based on the amount that can be raised due to additional subsidy.*

**ATTACHMENT O**

**PIH NOTICE 2016-17-RENTAL ASSISTANCE DEMONSTRATION (RAD) NOTICE  
REGARDING FAIR HOUSING AND CIVIL RIGHTS REQUIREMENTS AND RELOCATION  
REQUIREMENTS APPLICABLE TO RAD FIRST COMPONENT – PUBLIC HOUSING  
CONVERSION**



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

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<b>Special Attention of:</b>	<b>Notice</b>	H 2016-17 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

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

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

**1.1. Purpose**

This notice (Notice) provides PHAs,<sup>2</sup> Project Owners, and their RAD development partners with guidance regarding key fair housing and civil rights statutory and regulatory requirements, explains the situations in which HUD is requiring front-end fair housing and civil rights reviews, and provides information regarding the types of information that must be submitted to facilitate HUD’s review of certain fair housing and civil rights requirements in connection with public housing conversions under the First Component of RAD. This Notice also includes guidance

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<sup>1</sup> While this Notice addresses fair housing and civil rights requirements and relocation requirements, the fair housing and civil rights requirements are not limited to relocation issues.

<sup>2</sup> Consistent with PIH Notice 2012-32 (HA) REV-2 (PIH 2012-32 (HA) REV-2) (the “RAD Notice”), this Notice uses the term “PHA” to refer to the owner of the project prior to the RAD conversion and “Project Owner” to refer to the owner of the project after the RAD conversion.

regarding key relocation statutory and regulatory requirements, and details relocation requirements under RAD. This Notice only applies to projects converting under the First Component of RAD; it does not apply to the Second Component of RAD.<sup>3</sup>

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

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

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

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

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<sup>3</sup> Important fair housing, other civil rights, and relocation considerations apply also to the Second Component of RAD as provided in the RAD Notice. Participants in the Second Component of RAD must continue to comply with applicable fair housing, civil rights, and relocation statutes and regulations, and HUD may, at any time, initiate compliance or enforcement actions in connection with such requirements. The RAD Notice will continue as the primary source of information on fair housing and other civil rights requirements covering the Second Component of RAD without any change until further notice.

(b) the requirements of Section 104(d) of the Housing and Community Development Act of 1974 (Section 104(d)) if CDBG or HOME funds are included as part of the project, (c) fair housing and other civil rights considerations implicated by relocation activities, and (d) requirements for relocating residents under the RAD Notice.

## **1.2. PHA and Project Owner Responsibilities**

This Notice explains RAD's front-end fair housing and other civil rights review requirements in greater detail than was provided in the RAD Notice and this Notice restates and revises RAD's relocation requirements. However, the fair housing, other civil rights, and relocation requirements that apply to RAD conversions are neither limited to those discussed in this Notice, nor to those specifically reviewed by HUD in the front-end review.

### **MEETING HUD'S PROCESS AND REVIEW REQUIREMENTS NEVER CONSTITUTES COMPLIANCE WITH SUCH LAWS. THE OBLIGATION TO COMPLY WITH APPLICABLE FAIR HOUSING, OTHER CIVIL RIGHTS, AND RELOCATION LAWS REMAINS WITH THE PHA AND PROJECT OWNER.**

The fair housing and civil rights requirements that apply to RAD conversions are not limited to those discussed in this Notice. PHAs and Project Owners are responsible at all times for ensuring that their RAD activities (including those activities implemented by their agents, consultants, contractors, or other RAD team members) comply with all applicable fair housing and civil rights requirements. PHAs and Project Owners shall be accountable for all fair housing and civil rights compliance issues with respect to their RAD activities, whether those activities are undertaken directly or through agents, consultants, contractors, or other RAD team members. While HUD provides this non-exhaustive guidance to assist PHAs and Project Owners during transactions, complying with the requirements set forth in this Notice does not necessarily mean that they, or their agents or consultants, are in compliance with fair housing and civil rights requirements.<sup>4</sup>

This Notice is not intended to, and shall not be construed to, reduce or in any way limit the application of fair housing, other civil rights, and relocation laws and regulations to RAD transactions. For example, HUD's reliance on a PHA's certification that a site meets the site and neighborhood standards required by the RAD Notice is not a determination of compliance with the duty to affirmatively further fair housing or other fair housing and civil rights requirements. As another example, HUD's approval of a site for new construction does not, by itself, constitute a determination of the PHA's compliance with all provisions of Title VI and its duty to affirmatively further fair housing found in the Fair Housing Act and other fair housing and civil rights requirements, nor indicate HUD's approval of the PHA's or locality's overall housing strategy. HUD's approval of a RAD conversion after front-end review reflects only that the project may proceed through the RAD conversion process; it does not constitute a determination

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<sup>4</sup> The PHA's or Project Owner's agents, consultants, contractors, and other RAD team members may also have fair housing and other civil rights obligations (whether under this Notice or otherwise) and the forgoing does not, in any way, limit the independent obligation of any such parties to ensure their own compliance with applicable fair housing and other civil rights laws.

that the project is in compliance with applicable fair housing, civil rights, and relocation requirements.

HUD's approval of a front-end review submission is based on limited information and is intended to assist the PHA or Project Owner in meeting their fair housing, civil rights, and relocation obligations.<sup>5</sup> The PHA is responsible for ensuring that its RAD conversion is consistent with its certification to affirmatively further fair housing and complies with applicable civil rights laws.<sup>6</sup> The front-end reviews described in this Notice shall not be construed to limit other fair housing and civil rights investigations that HUD may conduct. HUD retains all compliance and enforcement authority.

HUD's determination that the PHA or Project Owner has failed to meet submission, certification, or approval requirements with respect to fair housing, other civil rights, or relocation requirements is grounds for terminating a Commitment to enter into a Housing Assistance Payments Contract (CHAP), denying the issuance of a RAD Conversion Commitment (RCC), or denying authority to convert under RAD.

### **1.3. Applicability**

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

This Notice supplements the RAD Notice with respect to fair housing and civil rights requirements applicable to public housing properties converting under RAD and with respect to all matters related to the relocation of residents as a result of RAD public housing conversions. To the extent that there is a conflict between this Notice and the RAD Notice, this Notice shall govern. This Notice replaces and supersedes Notice H 2014-09/PIH 2014-17 (issued July 14, 2014).

Upon issuance, the terms of this Notice will apply to all projects that have applied for conversion of assistance under the First Component of RAD but have not yet converted. As this Notice provides guidance, clarification, and explanation regarding fair housing and civil rights requirements that are already applicable to RAD conversions, this Notice shall not affect any front-end civil rights approvals provided by HUD prior to the effective date of this Notice and otherwise shall be effective with respect to front-end civil rights approvals without exception. However, with respect to relocation activities for Converting Projects under the First Component where a PHA has already submitted a Financing Plan pursuant to the RAD Notice at the time of issuance of this Notice, and provided that the Financing Plan has been accepted for full review after initial screening for completeness, the PHA may, within sixty (60) days after issuance of this Notice, request (in writing uploaded to the RAD Resource Desk) to be governed by H 2014-

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<sup>5</sup> For example, the front-end review is specific to an individual site. A PHA that does not promote fair housing choice outside areas of minority concentration and continues to site affordable housing in minority concentrated areas may be in noncompliance with the duty to affirmatively further fair housing and other fair housing and civil rights obligations, even if the specific site is approved based on the information provided and pursuant to the front-end review of the PHA's site and neighborhood standards submission.

<sup>6</sup> See 24 C.F.R. § 5.105 and, as applicable, 24 C.F.R. § 983.57(b)(2) or Appendix III of the RAD Notice.

09/PIH 2014-17. For such projects and where otherwise appropriate in cases of hardship as determined by HUD, HUD may apply the terms of H 2014-09/PIH 2014-17 with respect to relocation activities, but not with respect to fair housing and civil rights requirements.

RAD projects which have been awarded Choice Neighborhoods Implementation (CNI) grants are subject to the provisions of the applicable Choice Neighborhoods Notice of Funding Availability (NOFA) and grant agreement regarding site and neighborhood standards and are not subject to the RAD front-end civil rights transaction reviews described in this Notice. For properties being redeveloped with funding under a CNI grant, the relocation requirements set forth in this Notice are superseded by guidance regarding relocation included in the CNI NOFA. Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a Choice Neighborhood project's conversion of assistance.

#### **1.4. Explanation of Major Provisions**

This Notice adds to and revises pre-existing guidance related to fair housing, civil rights, and relocation (as contained in the RAD Notice and H 2014-09/PIH 2014-17) with respect to RAD transactions. Among the key provisions and changes are the following:

##### Fair Housing & Civil Rights

- Reaffirms the applicability of fair housing and civil rights requirements to all RAD-related activities (see, e.g., Section 3.3 and Section 4);
- Reiterates when HUD front-end civil rights review (originally outlined in the RAD Notice) is required in addition to the PHA's analysis and certification of compliance, to assist the PHA and Project Owner to comply with fair housing and civil rights requirements (see Section 5.3);
- Outlines certain conditions under which HUD will conduct a front-end review to determine whether the site is in an area of minority concentration relative to the site's housing market area (see Section 5.4(A));
- Provides guidance, for purposes of the RAD front-end civil rights review, on the concepts of "area of minority concentration" and "housing market area" that are reviewed when determining whether a site is in an area of minority concentration (see Section 5.4(B));
- Elaborates on specific information that HUD will consider, and that PHAs should provide evidence of, in order for a proposed site to meet the existing exceptions to permit new construction in an area of minority concentration, identifies presumptions for meeting the sufficient comparable opportunities exception and describes factors that HUD may consider in evaluating the overriding housing needs exception (see Section 5.4(C) and Section 5.4(D));
- Articulates issues that HUD will consider in completing the front-end civil rights review for transfers of assistance, including, for example, accessibility and minority concentration (see Section 5.5);
- Outlines the information to be submitted for HUD's front-end civil rights review of transactions where unit reductions, unit reconfigurations, or changes in occupancy are proposed (see Section 5.6);
- Identifies the situations where front-end civil rights reviews are required when changes in the accessibility features of a site are made (see Section 5.7(B)); and

- Prohibits the Project Owner of a Converted Project with a PBRA HAP contract from initiating any new leasing or marketing activities (other than leasing and outreach to households holding a right to return to the Covered Project), including the solicitation, distribution or acceptance of applications or development of a waiting list, until HUD has approved the Affirmative Fair Housing Marketing Plan (“AFHMP”) (see Section 5.8).

### Relocation

- Requires PHAs or Project Owners to prepare a written relocation plan for all transactions that involve permanent relocation or temporary relocation anticipated to exceed 12 months (see Section 6.1);
- Requires PHAs to provide residents with a RAD Information Notice (RIN) in order to ensure that residents are informed of potential project plans and of their rights in connection with RAD prior to submission of the RAD application (see Section 6.6(A));
- Clarifies that the General Information Notice (GIN), when applicable, should be provided as soon as feasible and no later than 30 days following the issuance of the CHAP (see Section 6.6(B));
- Requires Project Owners to provide a notification of Return to the Covered Project, when applicable (see Section 6.6(F));
- Moves the date before which PHAs are prohibited from beginning any physical relocation earlier in the conversion process (specifically, from the date of Closing to the later of the effective date of the RCC and the expiration of the 30- or 90-day RAD Notice of Relocation period, as applicable) (see Section 6.8);
- Clarifies the specific requirements applicable to different types of relocation (e.g., moves within a property, temporary relocation of less than 12 months, etc.) (see, e.g., Section 6.4);
- Provides enhanced guidance on the right to return requirements, any offers of alternative housing options and the documentation that must be retained when tenants choose an alternative housing option and decline their right to return (see, e.g., Section 6.2 and Section 6.10);
- Describes how HUD has administratively implemented URA requirements and URA relocation assistance and payments for displaced persons, when applicable, to residents who choose to decline the right of return and, instead, choose voluntary permanent relocation (see, e.g., Section 6.4(C) through (F) and Section 6.10);
- Requires PHAs to maintain detailed data regarding each household that will be relocated, with key dates of notices and moves (see Section 6.9); and
- Identifies key fair housing and civil rights requirements applicable during relocation (see, e.g., Section 4).

### **1.5. Request for Public Comment**

HUD acknowledges the complexity of the issues addressed in this Notice. This Notice is effective immediately upon issuance, but HUD also seeks comment from the public regarding the clarity and organization of the Notice and regarding areas where the policies and procedures described are unclear or ambiguous. HUD will consider whether changes in response to comments are justified and will implement any appropriate changes in a revision of this Notice. Please submit all comments to [RAD@hud.gov](mailto:RAD@hud.gov) within 30 days of the issuance of this Notice.



## **1.6. Paperwork Reduction Act**

In accordance with the Paperwork Reduction Act (PRA), HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number. OMB approved information collection forms will be posted on the RAD website and the Federal Register.

## SECTION 2. Table of Contents

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

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

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

## **SECTION 3. Background**

### **3.1. RAD Authority**

RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Pub. L. No. 112-55, enacted November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Public Law 113-76, enacted January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Public Law 113-235, enacted December 6, 2014), and the Division L, Title II, Section 237 of the Consolidated Appropriations Act (Public Law 114-113, enacted December 18, 2016), collectively and as it may be further amended from time to time, the “RAD Statute.” RAD allows certain eligible properties to convert assistance to long-term project-based Section 8 contracts and has two separate components. The First Component allows projects funded under the public housing program to convert their assistance to long-term, project-based Section 8 rental assistance contracts. Under this component of RAD, public housing agencies (PHAs) may choose between two different Section 8 housing assistance programs: project based vouchers (PBVs) or project-based rental assistance (PBRA). The “Second Component” of RAD allows owners of projects funded under the Rent Supplement (Rent Supp), Rental Assistance Payment (RAP), and Moderate Rehabilitation programs to convert certain units to PBV or PBRA Section 8 units following certain contract expirations or terminations. The RAD Statute is implemented by the RAD Notice.

### **3.2. Definitions**

All capitalized terms defined in the RAD Notice, as amended, shall have the definitions ascribed to them therein unless otherwise specifically noted in this Notice.<sup>7</sup> Pre-conversion projects whose assistance is converting from public housing to Section 8 under RAD are referred to in the RAD Notice and in this Notice as “Converting Projects.” Post-conversion projects are referred to in the RAD Notice and this Notice as “Covered Projects.”

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

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

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<sup>7</sup> Many of the fair housing and civil rights concepts used throughout this Notice are terms of art that are defined in applicable statutes and regulations identified in Appendix I of this Notice, while others have been developed through judicial interpretation. PHAs and Project Owners should familiarize themselves with these terms of art and should consult 42 U.S.C. § 3602 (Fair Housing Act); 24 C.F.R. §§ 5.152-100.20 (Fair Housing Act); 42 U.S.C. §§ 2000d-2000d-4a (Title VI of the Civil Rights Act of 1964); 24 C.F.R. § 1.2 (Title VI); 29 U.S.C. § 705 (Rehabilitation Act); 24 C.F.R. § 8.3 (Section 504); 42 U.S.C. §§ 12102, 12132, 12181 (Americans with Disabilities Act (ADA)); 28 C.F.R. § 35.104 (Title II of the ADA); and 28 C.F.R. § 36.104 (Title III of the ADA). In addition, many of the relocation concepts are terms of art that are defined in 42 U.S.C. § 4601 *et seq.* (Uniform Relocation Act (URA)), Section 104(d) of the Housing and Community Development Act of 1974 codified at 42 U.S.C. § 5304(d), and their implementing regulations at 49 C.F.R Part 24 and 24 C.F.R. Part 42 subpart C.

Part 1. PHAs and Project Owners must be familiar with these legal authorities and must evaluate, based on the facts of their situation, which legal authorities are applicable in which situations. **Failure to comply with any legal authority as applicable to the PHA's or Project Owner's actions or inactions may result in liability under such authority.** Appendix I does not attempt to provide a complete and exhaustive explanation of the legal authorities, nor to fully inventory the situations in which each legal authority is applicable. Instead, Appendix I is an overview intended to serve as a general introduction or reminder for PHAs and Project Owners of these fair housing, other civil rights, and relocation authorities and to facilitate their identification of appropriate topics for further research or expert counsel. The recitation of these legal authorities neither expands nor diminishes their applicability to the PHA's and Project Owner's activities in connection with their RAD conversion.

The RAD Statute authorizes the Secretary of HUD to waive or specify alternative requirements for certain provisions of law, except for requirements related to, among others, fair housing and nondiscrimination.<sup>8</sup> In addition to the general application of various federal statutes and their implementing regulations as discussed in Appendix I, below, HUD regulations at 24 C.F.R. § 5.105 apply such authorities to all HUD programs, including RAD.

### **3.4. Further Information**

Because each RAD proposal varies in its scope, this Notice may not address each PHA's or Project Owner's specific circumstances. PHAs and Project Owners should carefully review the laws, regulations, notices, and guidance material referenced in this Notice. Any questions related to the administration of the RAD program should be referred to the appropriate RAD Transaction Manager (TM) or may be emailed to [rad@hud.gov](mailto:rad@hud.gov).

## **SECTION 4. Generally Applicable Fair Housing and Civil Rights Requirements Relevant Throughout the RAD Conversion Process**

This Section provides a summary overview of key principles regarding program implementation and an overview of generally applicable fair housing and civil rights requirements. Appendix I identifies the key legal authorities from which these principles are derived. These key principals, together and with the legal authorities identified in Appendix I, frame the PHA's efforts to implement a RAD conversion. In some cases, these requirements are particularly relevant to the process of planning the RAD conversion, while in others they have particular relevance for the structure of the RAD transaction itself, and in yet other cases, both. Elements of RAD transactions that have civil rights implications include, but are not limited to, transfers of assistance, temporary and permanent relocation, demolition, site selection, new construction, occupancy policies, changes in unit configuration, increases or reductions in units, waiting list administration policies, policies regarding return of temporarily relocated tenants, substantial rehabilitation or alteration, program accessibility, tenant selection policies and priority transfers, providing information to and communicating with persons with Limited English Proficiency (LEP) and persons with disabilities, reasonable accommodation policies, and Affirmative Fair

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<sup>8</sup> See Pub. L. No. 112-55, as amended.

Housing Marketing Plans (AFHMPs). All PHAs must consider civil rights when structuring these and other elements of their RAD transaction.

RAD transactions are governed by the same civil rights authorities that govern HUD-assisted activities generally.<sup>9</sup> Converting Projects are subject to civil rights and equal opportunity requirements under the public housing regulations, and Covered Projects are subject to civil rights and equal opportunity requirements under the PBV regulations or the PBRA regulations, as applicable.<sup>10</sup> As described further below, the Fair Housing Act prohibits discrimination in housing<sup>11</sup> and requires all federal executive departments and agencies to “administer their programs and activities relating to housing and urban development ... in a manner affirmatively to further” fair housing.<sup>12</sup> In addition, all programs or activities receiving Federal financial assistance are subject to Title VI of the Civil Rights Act of 1964 forbidding discrimination on the basis of race, color, and national origin<sup>13</sup> and Section 504 of the Rehabilitation Act of 1973, which forbids discrimination on the basis of disability and requires that programs or activities receiving Federal financial assistance make such programs or activities “when viewed in its entirety” readily accessible to persons with disabilities and make reasonable accommodation to the needs of persons with disabilities.<sup>14</sup> RAD transactions are also subject, as applicable, to the requirements of Titles II and III of the Americans with Disabilities Act, Executive Order 11063, and HUD regulations at 24 C.F.R. part 107. Thus, as with the administration of all HUD programs and all HUD-assisted activities, fair housing and civil rights issues must be considered in the administration of the RAD program. PHAs must not implement actions and policies that may have a discriminatory effect on the basis of race, color, sex, national origin, religion, disability, or familial status or that may impede, obstruct, prevent, or undermine efforts to affirmatively further fair housing.<sup>15</sup> Note, in particular, the following requirements:

- **Affirmatively Furthering Fair Housing (AFFH):** The Fair Housing Act requires that HUD administer its programs and activities in a manner that affirmatively furthers the purposes of the Fair Housing Act. The Fair Housing Act not only prohibits discrimination but, in conjunction with other statutes, directs HUD’s recipients, including PHAs, to take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination. Through various statutes, regulations, and executive orders, PHAs must take various actions in accordance and in conjunction with their Fair Housing Act obligation to affirmatively further fair housing. For example, under regulations implementing the United States Housing Act of 1937 (the Act), HUD recipients must, among other requirements, certify that they will affirmatively further fair housing. In addition, under HUD’s Affirmatively Furthering Fair Housing (AFFH) rule promulgated July 16, 2015, PHAs must periodically conduct an Assessment

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<sup>9</sup> See 24 C.F.R. § 5.105.

<sup>10</sup> See, e.g., 24 C.F.R. §§ 880.601, 881.601 and 983.8 for civil rights related regulations applicable to PBV and PBRA transactions.

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

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

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

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

<sup>15</sup> See 24 C.F.R. part 1 and part 100 subpart G.

of Fair Housing (AFH) as set out by the rule, either individually or in collaboration with other program participants.<sup>16</sup> Under the AFFH rule, in order to develop a successful affirmatively furthering fair housing strategy, the PHA must assess the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs. PHAs must ensure that their activities in connection with a RAD conversion are consistent with their AFH, including any applicable joint or regional AFH in which they are a joint participant, and with any applicable Analysis of Impediments to Fair Housing Choice (AI), Fair Housing Equity Assessment, PHA 5-Year Plan, PHA Annual Plan, Moving to Work (MTW) Plan, or related planning documents and other regulatory and programmatic requirements implementing the obligation to affirmatively further fair housing to which they are a party.<sup>17</sup>

- **Nondiscriminatory Site Selection:** HUD’s site and neighborhood standards require that the proposed site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provision of Title VI of the Civil Rights Act, the Fair Housing Act, Executive Order 11063, and Department regulations implementing these authorities. The site must meet the Section 504 site selection requirements in 24 C.F.R. § 8.4(b)(5). Additional provisions appear in 24 C.F.R. § 983.57(b) of the PBV rules and, for PBRA, in Appendix III of the RAD Notice. HUD’s Title VI regulation specifically prohibits site selection that has the “purpose or effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination” on the basis of race, color, or national origin.<sup>18</sup> The Title VI regulations also impose an obligation on the part of an applicant or recipient of HUD financial assistance to take actions to overcome the effect of prior discrimination or conditions that limit participation by persons of a particular race, color, or national origin.<sup>19</sup> In addition, HUD’s Section 504 regulation prohibits recipients from selecting sites the purpose or effect of which would (1) exclude qualified individuals with disabilities from or deny them the benefit of a program or activity, or otherwise subject them to discrimination; or (2) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities.<sup>20</sup> ADA regulations likewise prohibit site selections that have the purpose or effect of excluding individuals with disabilities (including members of the public with disabilities), denying them benefits, or subjecting them to discrimination.<sup>21</sup> Finally, the Fair Housing Act prohibits discriminatory site selection, including perpetuation of segregation in transfers of assistance and new construction.
- **Meaningful Access for Persons with Limited English Proficiency (LEP):** The PHA or Project Owner is required to take reasonable steps to ensure (a) they provide meaningful access to programs and activities for persons who have a limited ability to read, speak, or understand English; (b) any person with LEP who will be temporarily relocated or

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

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

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

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

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

<sup>21</sup> *See* 28 C.F.R. § 35.130(b)(4); 28 C.F.R. § 36.301.

permanently displaced has meaningful access to any public meetings regarding the project; and (c) they provide meaningful access to LEP persons to any information provided to residents including, but not limited to, any relocation notices. Generally, the PHA or Project Owner will be responsible for providing oral interpreters at meetings, including ensuring their competence, and covering any associated translation and interpretation costs.<sup>22</sup>

- **Effective Communication for Persons with Disabilities:** Communications and materials must be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 C.F.R. § 8.6) and with 49 C.F.R. § 24.5, and as applicable, the Americans with Disabilities Act. This includes ensuring that, unless such actions would result in undue financial and administrative burdens or fundamental alterations, notices and resident meetings are provided in appropriate alternative formats as needed, e.g., Braille, audio, large type, accessible electronic communications, assistive listening devices, and sign language interpreters. Even in cases where the proposed actions may result in undue financial and administrative burdens or fundamental alterations, certain actions must still be taken. Specifically, appropriate auxiliary aids and services that would not result in such undue burdens or fundamental alterations must still be provided to ensure effective communication.
- **Accessible Meeting Facilities for Persons with Disabilities:** Pursuant to regulations implementing Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, as applicable, all programs and activities must be held in accessible locations unless doing so would result in an undue financial and administrative burden on the PHA and/or Project Owner, in which case the PHA or Project Owner must take any action that would not result in such undue burden but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity, e.g., briefings at an alternate accessible site or in-home briefing.<sup>23</sup> Individuals with disabilities must receive services in the most integrated setting appropriate to their needs. The most integrated setting appropriate to the needs of qualified individuals with disabilities is a setting that enables individuals with disabilities to interact with persons without disabilities to the fullest extent possible.<sup>24</sup>

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<sup>22</sup> For more information about LEP obligations, see HUD's Limited English Proficiency (LEP) Frequently Asked Questions guidance at

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/promotingfh/lep-faq#q26](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq#q26).

<sup>23</sup> In selecting locations for consultation with residents, the PHA and/or Project Owner shall be guided by the goal of maximizing participation in an integrated setting so that residents with disabilities and residents without disabilities may hear and consider each other's views. Priority shall be given to using on-site accessible locations (including, e.g., TV rooms or informal gathering places), even if doing so may require multiple sessions with smaller groups of residents. In addition, Title III of the Americans with Disabilities Act requires private entities that operate places of public accommodation, including social service establishments, leasing offices of private housing developments, and certain private housing providers, to comply with certain physical accessibility requirements which are similar to the requirements under Section 504 and Title II.

<sup>24</sup> See 28 C.F.R. part 35, Appendix B.



- **Accessibility for Persons with Disabilities Throughout the Planning and Implementation Process:** A number of accessibility requirements, including but not limited to site selection, apply to all RAD conversions, as they do to the PHA's activities regardless of the PHA's participation in RAD.<sup>25</sup> PHAs and Project Owners should also be aware that state or local laws, regulations, and codes may contain greater accessibility requirements. This Notice provides, in Appendix I, Part 2, an overview of accessibility requirements under existing law. The information in Appendix I, Part 2 is intended to assist with the PHA's or Project Owner's compliance with accessibility requirements. PHAs and Project Owners must review Appendix I, Part 2 early-on in planning for the RAD transaction. PHAs and Project Owners may determine that it is most efficient to address accessibility matters early in the project planning. In addition, PHAs and Project Owners must evaluate, throughout the transaction and based on the facts of their situation, which requirements are applicable in which situations to ensure they appropriately address accessibility requirements. PHAs and Project Owners are responsible for ensuring that the architectural drawings and construction comply with the PHA's and Project Owner's obligations and all Federal civil rights requirements, including accessibility requirements under the Fair Housing Act, Section 504, and the ADA.

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

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

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

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<sup>25</sup> For more detailed information on these laws and their requirements, see PIH Notice 2010-26, issued July 26, 2010 (available at <http://www.hud.gov/offices/pih/publications/notices/10/pih2010-26.pdf>). While this notice has an expiration date in 2011, because the notice summarizes and discusses regulatory requirements, the information in the notice provides helpful guidance.

- Reasonable Accommodations in Rules, Policies, Practices and Services:** Under the Fair Housing Act, the PHA or Project Owner must make reasonable accommodations in rules, policies, practices, and services when such accommodations may be necessary to afford a person with a disability an equal opportunity to use and enjoy a dwelling.<sup>26</sup> Under Section 504, the PHA or Project Owner must also make reasonable accommodations to residents with disabilities, which may include providing and paying for structural modifications to dwelling units and public or common use areas. Titles II and III of the ADA provide similar requirements. Common examples of reasonable accommodations that may occur during relocation are permitting an individual with a disability to relocate near public transportation, providing a unit larger than otherwise permitted for a live-in aide, and making exceptions to no-animal rules for assistance and service animals. Accommodations generally need not be made where providing such an accommodation would be an undue financial and administrative burden or a fundamental alteration of the nature of the service. However, reasonable accommodations must be made to the extent the accommodation does not impose an undue financial and administrative burden or a fundamental alteration of the nature of the service. Reasonable accommodations must follow the individual with the disability throughout the RAD process, including during relocation. Furthermore, PHAs and Project Owners may be required to provide particular reasonable accommodations during relocation, such as assistance moving household items.<sup>27</sup>
- Physical Changes to Dwelling Units, Public and Common Use Areas and Other Facilities for Accessibility:** Under the Fair Housing Act, the PHA or Project Owner may be required to permit reasonable modifications. A reasonable modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. Reasonable modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. A request for a reasonable modification may be made at any time during the tenancy. When relocating an individual with a disability who has such modifications in their dwelling unit or public and common use areas because of the individual's disability, regardless of who made them, the PHA or Project Owner has an obligation to provide and pay for such modification in the new dwelling. When considering requests by individuals with disabilities for structural changes to units or public and common use areas, PHAs and Project Owners should take particular note that they may be required to make and pay for such structural modifications as reasonable

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<sup>26</sup> For additional information regarding reasonable accommodations under the Fair Housing Act, *see* the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Reasonable Accommodations Under the Fair Housing Act (May 17, 2004), at <http://www.hud.gov/offices/fheo/library/huddojstatement.pdf>.

<sup>27</sup> *See* 49 C.F.R. part 24, Appendix A, § 24.2(a)(8)(vii), which states that under the URA, "Reasonable accommodation of a displaced person with a disability at the replacement dwelling means the Agency is required to address persons with a physical impairment that substantially limits one or more of the major life activities. In these situations, reasonable accommodation should include the following at a minimum: Doors of adequate width; ramps or other assistance devices to traverse stairs and access bathtubs, shower stalls, toilets and sinks; storage cabinets, vanities, sink and mirrors at appropriate heights. Kitchen accommodations will include sinks and storage cabinets built at appropriate heights for access. The Agency shall also consider other items that may be necessary, such as physical modification to a unit, based on the displaced person's needs."

accommodations under Section 504 and because of similar requirements under the ADA even though the Fair Housing Act may only require the owner to allow such changes to be made and paid for by the individual with a disability. Before determining that they are not required to make or pay for structural changes, PHAs and Project Owners are encouraged to consider carefully their obligations under each applicable statute.

## **SECTION 5. Application of Key Fair Housing and Civil Rights Requirements to RAD Transactions**

The generally applicable fair housing and other civil rights requirements described above, and in Appendix I, apply throughout the planning and implementation of a RAD transaction and the PHA is responsible for ensuring compliance with these requirements. As key requirements may be misunderstood, the RAD program has established specific additional procedures to assist RAD participants to ensure they comply with the applicable requirements. Specifically, the RAD Notice established a civil rights eligibility review and criteria for front-end civil rights reviews.

This Section elaborates on these requirements from the RAD Notice. The front-end review procedures described below establish procedures and criteria for the supplemental front-end review and technical assistance, criteria which are specific to the RAD program. Criteria for this supplemental front-end review are informed by, but not the same as, fair housing or civil rights rules and policies generally.

This Section is organized to loosely follow the stages of a RAD conversion transaction, beginning with RAD eligibility and continuing through site selection, transfer of assistance, unit design requirements and marketing. In addition, this Section describes the timing and procedures for submitting data and documents to HUD so that HUD may complete its front-end review. The submission procedures are also designed to serve as a tool for PHAs to identify issues of potential concern at appropriate stages of the RAD conversion and as a tool for HUD to identify potential needs for technical assistance.

### **5.1. RAD Eligibility Review**

To be eligible for RAD, the PHA must meet all eligibility requirements set forth in Section 1.3 of the RAD Notice, including the civil rights threshold requirements found at Section 1.3.G of the RAD Notice. A PHA must not have a charge, cause determination, lawsuit, or letter of findings, referenced in Section 1.3.G of the RAD Notice, against the PHA itself, its transferees, proposed development partners, or sub-recipients that has not been resolved, or is not in the process of being resolved, to HUD's satisfaction. This determination shall be made prior to issuance of the CHAP.

The CHAP may be revoked by HUD if HUD determines that the terms of the conversion would be inconsistent with fair housing and civil rights laws or a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement. HUD may terminate a CHAP or RCC if it determines that the terms of the conversion would be inconsistent with fair housing or civil rights laws or is inconsistent with, would hinder, or would delay satisfaction of a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement.

HUD may terminate an approval to proceed with a RAD conversion if it determines that the terms of the conversion would be inconsistent with fair housing or civil rights laws or a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement.

## **5.2. PHA’s Proposed Site Selection and Certification**

For all RAD conversions, the PHA must comply with all applicable site selection requirements as set forth in this Notice and the RAD Notice and in accordance with any additional applicable published guidance provided by HUD. As set forth in the RAD Notice, conversions of assistance to PBV involving new construction, whether on a new site or on a current site, are subject to the site selection standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (e), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2). All other conversions to PBV, including transfers of assistance to an existing property other than the Converting Project, are subject to the standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (d), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2).<sup>28</sup> Site selection requirements set forth at Appendix III of the RAD Notice apply to RAD conversions to PBRA assistance, as does the requirement not to place housing in neighborhoods with highly concentrated poverty based on the criteria formulated for transfers under Section 8(bb) of the United States Housing Act of 1937.<sup>29</sup> PBV and PBRA site selection must also be consistent with the requirements of the Fair Housing Act, Title VI, Section 504, the ADA and their implementing regulations.

It is the PHA’s responsibility to ensure that the site selection complies with all applicable site selection requirements, including the requirements of this Notice and the RAD Notice. Pursuant to the RAD Notice, the PHA must certify with the submission of its Annual Plan, Significant Amendment to its Annual Plan, or MTW Plan that it complies with the applicable site selection requirements and must maintain records of its analysis and the data relied upon in making its determination of compliance. The PHA must also determine and subsequently state in the certification that the site is “suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto.”<sup>30</sup> Although this Notice provides detail regarding certain civil rights-related site and neighborhood standards, PHAs must certify compliance with all applicable site and neighborhood standards.<sup>31</sup>

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

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

<sup>29</sup> 42 U.S.C. § 1437f(bb).

<sup>30</sup> For RAD conversions to PBRA, the RAD Notice uses the term “the site and neighborhood is suitable,” rather than “the site is suitable.” See Appendix III of the RAD Notice, paragraph (a).

<sup>31</sup> See 24 C.F.R. § 983.57 and the RAD Notice at Section 1.4(A)(7)

requirements described in 24 C.F.R. § 8.4(b)(5).<sup>32</sup> The Fair Housing Act, as implemented at 24 C.F.R. § 100.205, requires “covered multifamily dwellings” built for first occupancy after March 13, 1991, to contain accessible design features. HUD’s Section 504 regulations at 24 C.F.R. § 8.4(b)(5) require that, in determining the site or location of a federally assisted facility, an applicant for assistance or recipient may not make selections the purpose or effect of which would: (i) exclude qualified individuals with disabilities from, deny them the benefits of, or otherwise subject them to discrimination under, any program or activity that receives Federal financial assistance from HUD, or (ii) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities. Title II of the ADA contains a similar requirement that a public entity, such as the PHA, may not, in determining the site or location of a facility, make selections (i) that have the effect of excluding individuals with disabilities from, denying them the benefits of, or otherwise subjecting them to discrimination; or (ii) that have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the service, program, or activity with respect to individuals with disabilities.<sup>33</sup> Factors relevant to a site review under these standards may include, among others:

- Site features, such as inaccessible slopes in routes, lack of accessible sidewalks, curb ramps, accessible parking spaces, and placement of dumpsters or other physical features that would impede access to and movement within the site;
- Building features, such as inaccessible building entrances, other methods of ingress and egress, public and common use areas (e.g., the rental office, parking areas, mail areas, trash areas, community rooms, shared use toilet rooms, laundry facilities and walkways inside and outside that connect these public and common use areas to units), and barriers to access by members of the public; and
- Lack of accessible transit or para-transit and accessible public sidewalks and accessible transportation stops.

When such conditions are present at the site and would exclude individuals with disabilities from, deny them the benefits of, or otherwise subject them to discrimination, or would defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to individuals with disabilities, the site must not be selected unless the proposal includes remediation of the barriers to achieve compliance with accessibility requirements (including identification and remediation of any nonconforming design and construction conditions in “covered multifamily dwellings” under the Fair Housing Act). Remediation of the barriers may include, for example, physical accessibility improvements to the site, arrangements for access to accessible supportive services, or reasonable accommodations for current or prospective residents with disabilities, including members of the public. The Financing Plan submitted to HUD must describe and document resources sufficient to pay for the remediation of accessibility barriers.<sup>34</sup>

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

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

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

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

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

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

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

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

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

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

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

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

- (2) Transfers of assistance where all or a portion of the Converting Project's assistance is transferred to a new site(s) (either new construction or to an existing project) as part of the subject transaction. Front-end review of this activity shall be pursuant to Section 5.5(B), below and, in addition, the PHA shall certify in its Annual Plan compliance with site and neighborhood standards applicable to existing housing as described in Section 5.2.
- (3) Conversions of assistance where the total number of units in the Covered Project is less than the original number of units in the Converting Project (this includes de minimis reductions). Front-end review of this activity shall be pursuant to Section 5.6.
- (4) Conversions of assistance where the Covered Project's unit configuration is different from the unit configuration of the Converting Project. Front-end review of this activity shall be pursuant to Section 5.6.
- (5) Conversions involving a change in occupancy, where the Covered Project serves a different population from the one served by the Converting Project (e.g., when a Converting Project serves families but the Covered Project is subject to an elderly preference or introduction of restrictions or preferences based on age or disability that will change the occupancy of the property). Front-end review of this activity shall be pursuant to Section 5.6.
- (6) Conversions of assistance in which the construction schedule indicates that relocation is likely to exceed 12 months. Front-end review of this activity shall be pursuant to Section 5.7(A).
- (7) Conversions of assistance involving new construction or substantial alteration,<sup>35</sup> as those terms are defined in Section 504 of the Rehabilitation Act of 1973. Front-end review of this activity shall be pursuant to Section 5.7(B).
- (8) Conversions of assistance involving a Converting Project subject to a Voluntary Compliance Agreement or Conciliation Agreement with HUD or a Consent Decree or Settlement Agreement with the U.S. Department of Justice or HUD, or where the PHA is subject to such an agreement affecting its entire housing portfolio or otherwise related to the Converting Project. Front-end review of this activity shall be pursuant to Section 5.7(C).

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<sup>35</sup> Section 504 defines substantial alteration of a housing project as alterations where a housing project has 15 or more units, and the rehabilitation costs will be 75% or more of the replacement cost of the completed facility. *See* 24 C.F.R. § 8.23 (a).

- (9) Conversions of assistance where HUD has identified potential fair housing and civil rights concerns or a history of such concerns. Front-end review of this activity shall be pursuant to Section 5.7(C).

PHAs should note that a proposed RAD conversion may trigger front-end review regarding more than one of the activities listed in subsections (1) through (9) of this Section. For example, depending on the details of the proposal, a new construction on-site project could require review under subsections (1), (3), (4), (5), (6), and (7), or could require review under only subsections (1) and (7).

As part of HUD's review of these elements of the RAD conversion plans, HUD may require that PHAs that are carrying out portfolio or multi-phased conversions provide information on their conversion plans for other projects or subsequent phases to ensure that the overall plans for RAD conversion are consistent with civil rights and fair housing.

*B) Fair Housing, Civil Rights, and Relocation Checklist*

In connection with HUD's front-end fair housing and civil rights and relocation reviews described in this Section 5 and in Section 6, HUD is requiring submission of a Fair Housing, Civil Rights, and Relocation Checklist (the "Checklist"). The Checklist will facilitate the PHAs' and Project Owners' submission of necessary information to complete these reviews.<sup>36</sup> HUD anticipates that a revised Checklist, when available following Paperwork Reduction Act approval, will be separated into parts which can be submitted incrementally as the PHA and Project Owner develop the RAD transaction plans, with different elements of the Checklist applicable at different stages of the transaction planning process. For example, submissions regarding site selection for a RAD transaction involving new construction may occur well before submissions regarding a proposal to change the unit configuration.

The Checklist will outline the minimum information or documentation which HUD will need in order to review each part of the Checklist. After HUD's initial review of any portion of the Checklist, HUD may determine that the data provided in the Checklist is insufficient for HUD to complete its review, in which case HUD may require the PHA or Project Owner to provide supplemental information. The PHA should submit each part as early as possible once the information covered in the applicable part is known. All information specified in the applicable

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<sup>36</sup> The Checklist is available at [www.hud.gov/rad](http://www.hud.gov/rad). As of the publication of this Notice, references to the Checklist refer to the existing FHEO Accessibility and Relocation Plan Checklist under OMB Approval 2577-0276. The PHA shall use the existing Checklist to provide information related to demonstrating compliance with fair housing, other civil rights, and relocation requirements (including accessibility requirements) and, as necessary, may require additional materials for HUD to complete its review, which the PHA may provide in such form as the PHA determines appropriate. Also at [www.hud.gov/rad](http://www.hud.gov/rad), HUD has provided a listing of information that, depending on the circumstances, HUD may require to complete different components of its front-end review. The Checklist is being revised to fully capture the submission requirements described in this Notice. The revised Checklist will be subject to Paperwork Reduction Act approval and will be posted at the website listed above when available for use.



part of the Checklist must be submitted to HUD for HUD to begin its civil rights review – partial submissions of any applicable part of the Checklist will not be accepted.<sup>37</sup>

*C) Timing of Front-End Review Submissions*

PHAs and Project Owners are encouraged to submit applicable portions of the Checklist and information associated with a particular activity subject to front-end review as early as possible in the development of their plans. The PHA must ensure that HUD has approved all applicable parts of the Checklist prior to submission of the Financing Plan. Upon request from the PHA, HUD may, at HUD's sole discretion, permit submission of the Financing Plan prior to receipt of approval of the applicable parts of the Checklist and conditioned upon subsequent receipt of such approvals, in which event the PHA and Project Owner may proceed at their own risk.

Early approval of the site of the Covered Project is critical for RAD transaction proposals subject to front-end civil rights review involving site selection standards, specifically new construction in areas of minority concentration (see Section 5.3(A)(1)) and transfers of assistance (see Section 5.3(A)(2)). The PHA must conduct its own assessment of the site during the early stages of planning its RAD transaction. The guidance in this Notice and the Checklist are tools intended to assist the PHA in conducting its own assessment of the site.

The PHA must provide HUD with the Checklist and backup information sufficient for HUD to review the site with respect to the applicable standards. The site selection information should be provided to HUD no later than ninety (90) days following the issuance of the CHAP or, if the CHAP has already been issued as of the publication of this Notice, within ninety (90) days following publication of this Notice. In the event of a change in plans for the Converting Project that would require a front-end review of the site selection standards, the PHA must provide the Checklist and backup documentation within sixty (60) days of the change in plans. PHAs are strongly encouraged to provide front-end review submissions and secure HUD approval prior to applying for LIHTCs or taking action the reversal of which (in the event of non-approval of the site) would be detrimental to the PHA or the Project Owner. PHAs are also encouraged to contact FHEO for technical assistance prior to submission of these materials.

All PHAs shall submit a certification consistent with the requirements of Section 5.2, above. This certification may be prepared specifically in connection with the Checklist or as part of the PHA Annual Plan or Significant Amendment. However, HUD will not consider a submission complete for front-end civil rights review without this certification. All RAD conversions must submit the PHA certification described in Section 5.2 no later than at the time of submission of the Financing Plan.

*D) Completion of HUD's Front-End Review*

HUD will not approve a RAD conversion if HUD determines that the conversion would operate to discriminate in violation of applicable fair housing and civil rights laws. HUD will not approve proposals that have the purpose, intent, or effect of discriminating on the basis of

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<sup>37</sup> The Checklist refers to the existing FHEO Accessibility and Relocation Checklist until a revised Checklist is approved for use pursuant to the Paperwork Reduction Act.

protected class (*i.e.*, race, color, national origin, religion, sex, disability, and familial status). If HUD does not approve a proposed activity based on a front-end review, then it will provide a written description of concerns or deficiencies. The PHA may resubmit the front-end review materials with a changed proposal and/or with additional information addressing HUD's concerns and any deficiencies in the proposal or the submission.

In some circumstances, a special condition to the transaction's RCC will be necessary to ensure that a RAD transaction conforms to fair housing and civil rights requirements. Special conditions to the RCC reflect the conditions necessary in order to complete the RAD conversion. For example, if there is an outstanding remedial agreement or order requiring particular development activities or operating policies to correct a violation of a fair housing or other civil rights requirement, the RCC generally will condition participation in RAD upon agreement by the PHA or the Project Owner, as applicable, to comply with the provisions of such agreements or orders after conversion.

#### **5.4. Front-End Civil Rights Review for RAD Transactions Involving New Construction**

##### *A) Conditions Triggering Review*

If the proposed project is located in an area of minority concentration, the new site may be approved only if it falls under a permitted exception and meets the other site selection requirements described in Section 5.2. Under the PBV and PBRA site and neighborhood standards, HUD may approve new construction in an area of minority concentration, consistent with the regulatory requirements cited above, only if:

- a. Sufficient, comparable housing opportunities for minority families in the income range to be served by the proposed project exist outside areas of minority concentration; or
- b. The project is necessary to meet overriding housing needs that cannot be met in that housing market area.<sup>38</sup>

As described in the RAD Notice and in Section 5.3(A) of this Notice, above, HUD will conduct a front-end civil rights review of the PHA's proposed site in certain circumstances. This Notice specifies that for conversions of assistance involving new construction where there are indications that the site may be located in an area of minority concentration per the criteria in subsections (i), (ii), or (iii), below (whether the construction is located on the existing public housing site or on a new site), HUD will conduct a front-end civil rights review of the site to determine whether the site is in an area of minority concentration and, if so, whether it meets one of the exceptions that would allow for new construction in an area of minority concentration.

The PHA shall submit for HUD front-end review the PHA's findings, together with backup documentation, regarding site selection when the site meets any of the following criteria:

- i. The PHA self-identifies the area of the site as an area of minority concentration,

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<sup>38</sup> 24 C.F.R. § 983.57(e)(3) and Appendix III of the RAD Notice, paragraph (e).

- ii. The census tract of the site meets the extent of minority concentration described in Section 5.4(B)(1), below, or
- iii. An area comprised of the census tract of the site together with all adjacent census tracts, analyzed as a whole, meets the extent of minority concentration described in Section 5.4(B)(1), below.

If any of these three criteria is applicable, HUD will conduct a review to determine whether the site is in an area of minority concentration and, if applicable, whether the proposed site fits one of the exceptions permitting new construction in an area of minority concentration described in this Section 5.4. A proposed RAD transaction which does not meet one of these triggers must still be evaluated by the PHA and the PHA must certify compliance with the site selection requirements as described in Section 5.2, above.

A PHA seeking to undertake new construction must receive written approval from HUD of any site selection subject to front-end review prior to entering into any construction contract for that new construction.

#### *B) Analysis of Areas of Minority Concentration*

This Section sets forth the methodology that HUD will use in the analysis of the extent of minority concentration, the area of the site, and the housing market area for purposes of the RAD front-end civil rights review. As noted below, this analysis is fact specific and PHAs may submit documentation to inform HUD's analysis in cases where there is strong evidence that an alternative methodology would be more appropriate.

- (1) For purposes of RAD, a site is considered to be in an area of minority concentration when either (i) the percentage of persons of a particular racial or ethnic minority within the area of the site is at least 20 percentage points higher than the percentage of that minority group in the housing market area as a whole or (ii) the total percentage of minority persons within the area of the site is at least 20 points higher than the total percentage of minorities in the housing market area as a whole.<sup>39</sup>
- (2) For purposes of RAD, the analysis of an area of minority concentration will use census tracts to approximate the "area" of the site but the analysis may consider alternate proposed geographies instead of the census tract in instances where there is strong evidence that such geography is more appropriate. Strong evidence that an alternative geography is more appropriate includes: (i) that the site is close to the edge of the census tract, (ii) that the population of the census tract is heavily influenced by the size of the Converting Project, or (iii) that the local community

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<sup>39</sup> The percentage of minorities shall be calculated by subtracting the percentage of White Non-Hispanic persons in the relevant area from 100%. The analysis shall be based on the most recently available decennial census data found at [http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC\\_10\\_DP\\_DPDP1&src=pt](http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_DP_DPDP1&src=pt). However, if such data is more than five years old, and if either the PHA or HUD requests the use of more recent data based on such party's awareness of significant and material shifts in the demographics of the relevant area in the intervening years, the analysis shall be based on the most recent American Communities Survey data.

understanding of the immediate neighborhood dictates a different boundary. Local community understanding of the immediate neighborhood is often informed by factors such as patterns of housing stock (such as different residential densities in different areas or differential housing prices for similar properties), community facilities and amenities (such as schools and commercial areas) or major geographic barriers (such as rivers or interstate highways), among other factors.<sup>40</sup> HUD will determine the site's "area" using the best available evidence and following the legal standards set forth in applicable case law.

- (3) For purposes of the RAD analysis under this Section 5.4, a "housing market area" is the geographic region from which it is likely that residents of housing at the proposed site would be drawn for a given multifamily housing project. A housing market area generally corresponds to, as applicable: (i) the Metropolitan Statistical Area (MetroSA); (ii) the Micropolitan Statistical Area (MicroSA); or (iii) if the site is in neither a MetroSA nor a MicroSA, either (x) the county or statistically equivalent area, or (y) the PHA's service area, whichever is larger.<sup>41</sup> The analysis may consider a larger or smaller housing market area in instances where there is strong evidence that such housing market area is more appropriate. Strong evidence that an alternative housing market area is more appropriate may include factors such as regional employment centers and commuting patterns serving such employment centers. A PHA seeking to use an alternative housing market area must consult with HUD and establish to HUD's satisfaction that the methodology for identifying and documenting the alternative housing market area is warranted and sound.

### C) *The Sufficient Comparable Opportunities Exception*

As required by the RAD Notice and noted in Section 5.4(A), one of the exceptions under which the site and neighborhood standards permit new construction in areas of minority concentration is if sufficient, comparable housing opportunities for low-income minority families exist outside areas of minority concentration. This section clarifies HUD's procedures for assessing comparable housing opportunities and evaluating how the proposed new construction will impact the balance of housing choices within and outside areas of minority concentration. It also includes a list of the information PHAs should submit to inform HUD's assessment of relevant factors, and key considerations guiding HUD's analysis of each factor.

Under the governing PBV and PBRA requirements, units are considered comparable opportunities if they are the same household type (e.g., elderly, disabled, family, large family), tenure type (owner, renter), require approximately the same total tenant payment toward rent,

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

<sup>41</sup> Items (i) and (ii) are consistent with a Core Based Statistical Area as defined by the Office of Management and Budget. For reference, a Core Based Statistical Area consists of the county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core.

serve the same income group, are located in the same housing market area, and are in standard condition.<sup>42</sup>

It is important to note that the sufficient comparable housing opportunities exception “does not require that in every locality there be an equal number of assisted units within and outside of areas of minority concentration. Rather, application of this standard should produce a reasonable distribution of assisted units each year, that, over a period of several years, will approach an appropriate balance of housing choices within and outside areas of minority concentration. An appropriate balance in any jurisdiction must be determined in light of local conditions affecting the range of housing choices available for low-income minority families and in relation to the racial mix of the locality’s population.”<sup>43</sup>

HUD will assess “the overall impact of HUD-assisted housing on the availability of housing choices for low-income minority families in and outside areas of minority concentration, and must take into account the extent to which the following factors are present, along with other factors relevant to housing choice.”<sup>44</sup> Under this exception, it is not sufficient for one factor to be present, nor is it required that all factors be present, as the analysis must consider all relevant facts and evaluate the totality of the circumstances.

- “A significant number of assisted housing units are available outside areas of minority concentration.”<sup>45</sup> While HUD must consider all factors relevant to housing choice, 30% or more of deeply subsidized housing units for very low-income persons would be a significant number. To facilitate HUD’s consideration of this factor, a PHA should provide the number, occupancy type, and location of all comparable assisted units.<sup>46</sup>
- “There is significant integration of assisted housing projects constructed or rehabilitated in the past 10 years, relative to the racial mix of the eligible population.”<sup>47</sup> To facilitate HUD’s consideration of this factor, a PHA should provide the name and location of assisted housing projects constructed or rehabilitated in the PHA’s jurisdiction in the past 10 years and the demographic characteristics of the residents of each of these projects;
- “There are racially integrated neighborhoods in the locality.”<sup>48</sup> To facilitate HUD’s consideration of this factor, a PHA should provide the name and census tracts where these racially integrated neighborhoods are located. In general, HUD will consider a neighborhood racially integrated if the neighborhood does not have a high concentration of persons of a particular race or ethnicity when compared to the housing market area in which the neighborhood is located.

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

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

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

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

<sup>46</sup> Note that this factor is in reference to comparable assisted units that may or may not be in the PHA’s portfolio. The presumption stated at the end of this Section (i.e., that sufficient comparable opportunities exist if at least 50% of the comparable hard units in the PHA’s portfolio, including PBV developments using the PHA’s subsidy, are outside areas of minority concentration) is focused on units within the PHA’s portfolio.

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

<sup>48</sup> 24 C.F.R. § 983.57(e)(3)(v)(C) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(iii).

- “Programs are operated by the locality to assist minority families that wish to find housing outside areas of minority concentration.”<sup>49</sup> Such programs may include measures such as increasing payment standards in excess of 110% of FMR or the use of Small Area FMRs, including in setting exception rents, or reservation of a percentage of HCVs dedicated to support choice mobility selections or implementation of proven mobility counseling and supports for residents, provided the PHA provides sufficient evidence that it will continue such measures. To facilitate HUD’s consideration of this factor, a PHA should provide the names of the applicable program(s); the entity responsible for implementing the program(s) (e.g., city, county, state government); and any information demonstrating that the program(s) has been successful or predictably will achieve success in assisting persons who wish to move to non-concentrated areas.
- “Minority families have benefited from local activities (e.g., acquisition and write-down of sites, tax relief programs for homeowners, acquisitions of units for use as assisted housing units) undertaken to expand choice for minority families outside of areas of minority concentration.”<sup>50</sup> To facilitate HUD’s consideration of this factor, a PHA should provide the names of the applicable activity(s); the entity responsible for implementing the activity(s) (e.g., city, county, state government); and any information demonstrating that the activity(s) has been successful in expanding choice for minority families outside of areas of minority concentration;
- “A significant proportion of minority households has been successful in finding units in non-minority areas under the tenant-based assistance programs” (e.g., the Housing Choice Voucher programs).<sup>51</sup> To facilitate HUD’s consideration of this factor, a PHA should provide the number of minority households receiving Housing Choice Vouchers; the number of minority households using HCVs in non-minority areas; and the non-minority census tracts where the HCVs are being used. While each local situation is distinct and HUD must consider all factors relevant to housing choice, 30% or more of new leases signed by minority heads of household using HCVs located in non-minority areas over a period greater than three years prior to the date of HUD’s analysis would be a significant proportion.
- “Comparable housing opportunities have been made available outside areas of minority concentration through other programs.”<sup>52</sup> To facilitate HUD’s consideration of this factor, a PHA should describe the opportunities that have been made available, the location of those opportunities, and the number of minority families that have benefitted from the program in recent years. Such programs could include choice mobility strategies, acquisition strategies to acquire and add to the PHA’s portfolio existing apartments in high opportunity areas and transfers of assistance to high opportunity areas.

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

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

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

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

<sup>52</sup> 24 C.F.R. § 983.57(e)(3)(v)(G) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(vii).

determines such an analysis would assist in this evaluation, HUD will consult with appropriate parties to establish or accept an appropriate methodology for such an analysis to address HUD's civil rights concerns and to ensure appropriate independence between the analyst and the PHA or Project Owner commissioning and paying for the study.

Absent information to the contrary, for purposes of HUD's front-end review of the PHA's analysis, HUD will apply a presumption that sufficient comparable opportunities exist if at least 50% of the comparable hard units in the PHA's portfolio, including PBV developments using the PHA's subsidy, are outside areas of minority concentration.<sup>53</sup> The PHA's portfolio includes all public housing, PBV and PBRA hard units (including those developed under HOPE VI or Choice Neighborhoods) controlled by the PHA and its instrumentalities or funded using PHA-controlled subsidy. Upon adequate documentation of this presumption, the PHA need not provide additional documentation for HUD's front-end review of the sufficient comparable opportunities exception. This presumption may be rebutted by information to the contrary, including information regarding the preceding factors. In assessing whether sufficient comparable opportunities exist when the presumption does not apply, HUD will consider the factors listed above.

Absent information to the contrary, for purposes of HUD's front-end review of the PHA's analysis, HUD will apply a presumption that sufficient comparable opportunities exist if a set of RAD conversions from a single public housing property, individually or in a combination of transactions, will result in the creation of as many similarly-affordable housing units outside areas of minority concentration as are constructed on the original public housing site. To evaluate the creation of similarly-affordable units, HUD will compare (i) the number of affordable units that will be redeveloped on site, to (ii) the number of similarly-affordable housing units that will be created through new construction, imposition of new long-term affordability restrictions or transfer of RAD assistance to one or more sites outside areas of minority concentration.<sup>54</sup> Similarly-affordable shall mean RAD units compared to RAD units and LIHTC/non-RAD units compared to LIHTC/non-RAD units. The newly created similarly-affordable units must be owned, controlled, sponsored, under common ownership, control or sponsorship, or financially supported by the PHA or by an entity with a managing ownership interest in the Project Owner. When a PHA seeks to claim this exception, HUD prefers that the transaction creating the similarly-affordable units on the site outside areas of minority concentration close (with an immediate or delayed HAP effective date, if applicable) prior to the closing of the RAD conversion in the area of minority concentration. However, if the PHA determines that such a sequence is not reasonably possible, unless otherwise approved by HUD the PHA must provide evidence to HUD that the transfer of assistance to a site outside areas of

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<sup>53</sup> When determining the percentage of units outside of areas of minority concentration, the PHA must include the number of units planned at the proposed site in its calculations. While not required, PHAs or Project Owners may assist HUD in consideration of this presumption by submitting to HUD a map produced by the Affirmatively Furthering Fair Housing Data and Mapping Tool ("AFFH-T"), as may be available on the HUD website from time to time, showing the location of publicly assisted housing.

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

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

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

*D) The Overriding Housing Needs Exception*

As noted in Section 5.4(A), the second exception under which the site and neighborhood standards permit new construction in areas of minority concentration is if the project is necessary to meet overriding housing needs that cannot be met in that housing market area. The new construction site selection standards under RAD<sup>55</sup> outline two examples of circumstances, consistent with fair housing and other civil rights objectives, that would permit the application of the overriding housing needs exception: (1) when the site is “an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood;” or (2) when the site is “located in a neighborhood experiencing significant private investment that is demonstrably improving the economic character of the area (a “revitalizing area”).”<sup>56</sup>

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

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

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

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<sup>55</sup> See 24 C.F.R. § 983.57(e)(2) for PBV transactions and paragraph (e) of Appendix III of the RAD Notice for PBRA transactions.

<sup>56</sup> 24 C.F.R. § 983.57(e)(3)(vi); see also Appendix III of the RAD Notice, paragraph (e)(1)(B)(viii)(2). In demonstrating an overriding housing need, the “neighborhood” is determined in each situation based on the overall facts and circumstances and cannot be mechanically determined. The “immediate neighborhood” is generally a smaller geographic area than the “neighborhood.”



In determining whether such an official, currently operational and realistically achievable plan for the improvement or revitalization of the area exists, HUD will consider relevant factors including, for example, whether:

- The strategy itself, or a plan supporting the strategy, has been enacted, adopted, or ratified by a municipal, county, or state legislative body;
- There has been progress to implement the plan, or the strategy as a whole.<sup>57</sup>
- The plan or strategy as a whole, or the elements applicable to the Covered Project, are consistent with the jurisdiction's land use or zoning code, development regulations, or other official body of laws or rules;
- Strategies or activities under the plan are incorporated in current public, quasi-public agency or major institutional work plans;
- The plan, or the strategy as a whole, includes objectives and initiatives related to the preservation or restoration of a geography larger than the Converting Project and any associated public housing site;
- A jurisdiction has published solicitations or incentives for development projects in the improvement or revitalization area;
- The plan is incorporated in the applicable jurisdiction's Consolidated Plan or other comprehensive community development plan;
- A jurisdiction has explicitly designated the geographic area for improvement or revitalization (e.g., Business Improvement District; Enterprise Zone designation; Promise Zone designation; Choice Neighborhoods designation);
- An implementing agency has retained a construction firm to break ground on the improvement or revitalization; and/or
- An implementing agency has secured financing, such as the issuance of bonds or final approval for tax increment financing.

(2) Establishing that the Site is Located in a "Revitalizing Area"

Evidence that the site is located in a revitalizing area experiencing significant private investment that is demonstrably improving the economic character of the area is also an example of a site which meets an overriding housing need. HUD will consider all relevant factors in making a determination that the site is located in a "revitalizing area" but in particular will consider whether:

- i. The neighborhood has demonstrated signs of revitalization, through indicators such as low or declining census tract poverty rates, low or declining violent crime rates or evidence of high or increased educational opportunity, high or increasing median

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<sup>57</sup> Indicators of progress should be appropriate to the amount of time since the plan or strategy was developed and there must be a reasonable, supportable expectation that the plan will continue to be implemented. For example, if a plan was launched 3-4 years prior and the initial steps of the plan required implementation of an initiative (such as real estate development) which has a long pre-development planning period, HUD may consider whether there has been activity to seek land development approvals or to develop construction drawings or to secure funding commitments or other activities providing evidence that one or more material elements of the plan or strategy are actually being implemented.

- household income, high or increasing homeownership rates and/or high or increased employment; and
- ii. There is high private and public investment in retail, commercial, or housing development that has occurred or will imminently occur in the area which may include, among other considerations:
    - Evidence of new or improved retail centers, grocery stores, pharmacies, healthcare facilities, community centers, educational and recreational facilities, municipal services, and transportation serving the neighborhood;
    - Evidence of private and public investment or housing development that has occurred or will imminently occur in the area;
    - Evidence of economic conditions that are impacting the preservation of affordable housing in the neighborhood, including indicators of gentrification such as housing costs rising more sharply in the neighborhood than in the jurisdiction overall, accelerated rates of homeownership in the neighborhood, and disproportionate depletion of larger dwellings for families with children.

### (3) Circumstances in Which an Overriding Housing Needs Exception Does Not Apply

A PHA cannot establish that a site meets the overriding housing needs exception if the only reason the need cannot otherwise be feasibly met is that discrimination on the basis of race, color, religion, sex, national origin, age, familial status, or disability renders sites outside areas of minority concentration unavailable or if the use of this standard in recent years has had the effect of circumventing the obligation to provide housing choice.<sup>58</sup> For example, the overriding housing needs exception may not be applied if the reason that the project cannot be sited outside of an area of minority concentration is due to community opposition to the project based on the actual or perceived protected characteristics of the residents or prospective residents of the project. In addition, a recipient may not exclusively rely on this exception as a means of siting projects without creating housing opportunities outside of areas of minority concentration or without preserving existing housing outside of areas of minority concentration.

## **5.5. Front-End Civil Rights Review for RAD Transactions Involving Transfer of Assistance**

### *A) Applicable Standards*

Transfers of assistance are subject to the site selection standards for existing or rehabilitated housing set forth in 24 C.F.R. § 983.57(a)-(d), with the exception of 24 C.F.R. § 983.57(b)(1) and (c)(2), for PBV conversions and Appendix III of the RAD Notice for PBRA conversions. All transfers of assistance to a new site(s) are subject to front-end review by HUD, as required by the RAD Notice and noted in Section 5.3(A)(2) of this Notice. Conversions involving a transfer of assistance may also involve one or more of the other activities which trigger front-end review as described in Section 5.3(A). In transfers of assistance involving any of these activities, HUD

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<sup>58</sup> 24 C.F.R. § 983.57(e)(3)(vi) and Appendix III of the RAD Notice, paragraph (e)(2). The PBRA site and neighborhood standards use the phrase “on the basis of race, color, creed, sex or national origin.” See Appendix III of the RAD Notice.

will conduct a front-end review based on the requirements applicable to each activity. A PHA must submit documentation for the front-end civil rights review of each specific activity as required by the relevant sections of this Notice.

*B) Analysis of Transfers of Assistance*

Through the front-end review of transfers of assistance by FHEO, HUD seeks to assist the PHA in avoiding discrimination on the basis of race, color, national origin, religion, sex, disability or familial status. The front-end review of transfers of assistance will apply the site selection standards for existing/rehabilitated housing.<sup>59</sup> This review shall consider:

- (1) The accessibility of the proposed site for persons with disabilities;
- (2) The ability of the RAD conversion to remediate accessibility concerns;
- (3) Whether the transfer of assistance would result in assisted units being located in an area where the total percentage of minority persons is significantly higher than the total percentage of minority persons in the area of the original public housing site or in an area where the percentage of persons of a particular racial or ethnic minority is significantly higher than the percentage of that minority group in the area of the original public housing site.<sup>60</sup> For purposes of this analysis, HUD will examine the minority concentration of:
  - (a) the census tract of the original public housing site compared to the census tract of the proposed site; and
  - (b) an area comprised of the census tract of the original public housing site together with all adjacent census tracts compared to an area comprised of the census tract of the proposed site together with all adjacent census tracts.
- (4) Whether the site selection has the purpose or effect of:
  - (a) Excluding individuals from, denying them the benefits of, or subjecting them to discrimination under the RAD program or the applicable rental assistance program;
  - (b) Excluding qualified individuals with disabilities from or denying them the benefit of the RAD program or the applicable rental assistance program, or otherwise subjecting them to discrimination;
  - (c) Defeating or substantially impairing the accomplishment of the objectives of the RAD program or the applicable rental assistance program with respect to qualified individuals with disabilities; and

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<sup>59</sup> 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, paragraphs (a) through (d). The site selection standards for existing/rehabilitated housing do not apply the minority concentration test used for new construction found at 24 C.F.R. § 983.57(e)(3) and Appendix III of the RAD Notice, paragraph (e).

<sup>60</sup> While this review is not explicitly called out in 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, it is derived from HUD's and the PHA's obligations to comply with civil rights laws and regulations, including those referenced in 24 C.F.R. § 983.57(b)(2) and Appendix III of the RAD Notice.

- (d) Excluding individuals with disabilities (including members of the public with disabilities), denying them benefits or subjecting them to discrimination.

Under the RAD Notice, there are other standards for review of a transfer of assistance which are not examined as part of the front-end civil rights review but are examined as part of the RAD Financing Plan review (e.g., criteria formulated for transfers under Section 8(bb) of the United States Housing Act of 1937 regarding neighborhoods with highly concentrated poverty). Identification of considerations for the front-end review do not preclude review by HUD of all standards referenced in the RAD Notice.

### **5.6. Front-End Civil Rights Review for RAD Transactions Involving Reduction in Number of Units, Changes in Bedroom Distribution of Units and Changes in Occupancy Requirements**

The RAD Notice allows PHAs to reduce the number of units, change the bedroom distribution of units, or change the occupancy of projects as part of their RAD conversion.<sup>61</sup> However, the RAD Notice also provides that such changes (including de minimis changes) must undergo a front-end civil rights review and receive approval from HUD prior to submission of the Financing Plan. The Checklist will require data for review along with an explanation, backed by sufficient evidence, of how the PHA determined that that the proposed change will not result in discrimination on the basis of race, color, national origin, religion, sex, disability, familial status, actual or perceived sexual orientation, gender identity or marital status.<sup>62</sup>

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

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

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

<sup>62</sup> Reductions in the number of units, changes in the bedroom distribution of units, or changes in occupancy violate the Fair Housing Act (the Act) if they have a discriminatory effect on the basis of race, color, national origin, religion, sex, disability, or familial status. Unlawful housing discrimination may be established by a policy's or practice's discriminatory intent or by its discriminatory effect, even if not motivated by discriminatory intent, consistent with the standards outlined in 24 C.F.R. § 100.500. A policy or practice can have an unjustified discriminatory effect, even when the provider had no intent to discriminate. Under this standard, a facially-neutral policy or practice that has a discriminatory effect violates the Act if it is not supported by a legally sufficient justification. In addition, the policy or practice violates the Act if the housing developer or provider intentionally discriminates, including for example, by reducing the number of bedrooms with the intent of limiting families with children. Furthermore, the policy or practice may also violate the Act where it creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin. In addition, any changes must conform with the Equal Access rule requirement that determinations of eligibility for housing that is assisted by HUD or subject to a mortgage insured by the FHA shall be made in accordance with program eligibility requirements, and the housing must be made available, without regard to actual or perceived sexual orientation, gender identity or marital status. 24 C.F.R. § 5.105(a)(2).

Similarly, replacing larger units with smaller units so as to exclude families with children would be unlawful discrimination because of familial status.

Additionally, reductions in units or changes in bedroom distribution must not have an unjustified discriminatory effect on members of a protected class. For example, a reduction in units could have a discriminatory impact if it excludes members of a particular race or religion. Reductions or changes that have a disparate impact on a protected class are unlawful under the Fair Housing Act if they are not necessary to achieve a substantial, legitimate, nondiscriminatory interest of the developer or housing provider, or if such interest could be served by another practice that has a less discriminatory effect.

The RAD Notice allows for a de minimis reduction in units at Converting Projects, which includes both a small number of units as well as the reduction of certain units that have been vacant for 24 months prior to application, that are being or will be used for social service delivery, or efficiencies that will be reconfigured to one-bedroom units.<sup>63</sup> In addition, a PHA converting multiple properties can consolidate the de minimis reductions derived from multiple properties at a small number of sites. The RAD Notice also allows for changes in bedroom distribution. Such de minimis reductions are still subject to front end civil rights review and applicable fair housing and civil rights laws.

HUD shall conduct a front-end civil rights review if the plan for a Converting Project results in:

- A reduction in the number of dwelling units in any of the following categories: (i) units with two bedrooms, (ii) units with three bedrooms or (iii) units with four or more bedrooms.
- A reduction in the number of UFAS accessible units;
- An increase in the number of UFAS accessible units for persons with mobility impairments beyond 10% of the units in the Covered Project or 1 unit, whichever is greater.
- An increase in the number of UFAS accessible units for persons with vision and hearing impairments beyond 4% of the units in the Covered Project or 1 unit, whichever is greater.

When a Converting Project is subject to a front-end civil rights review under this subsection, the PHA shall submit to HUD the relevant part of the Checklist together with a justification which must demonstrate that the changes are not the result of discriminatory intent and will not have a discriminatory effect on members of protected classes, particularly families with children and individuals with disabilities. Relevant data for this analysis of the proposed change at the project may include the PHA's overall affordable housing stock, the demand for affordable housing in the market as evidenced by information such as the overall jurisdiction and regional demographic data available from the AFFH Data and Mapping Tool (e.g., both basic demographic and disproportionate housing needs data), the PHA's waiting list or a reliable market study of households seeking assisted housing, compared to the relative proportions of

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<sup>63</sup> See Section 1.4.A.4 of the RAD Notice.

units serving any particular household type in the proposed project, the PHA's total housing stock or all assisted housing in the area.

For any increase in UFAS units subject to front-end review, HUD will assess indicators of local need (see Section 5.7(B), below) and whether the change would operate to concentrate individuals with disabilities in a particular property or to exclude individuals with certain types of disabilities from a particular property.

*B) Review of Changes in Occupancy Type*

RAD conversions that result in the implementation of an admissions preference (e.g., residency preferences or restrictions) at the Covered Project that would alter the occupancy of the property (e.g., family units converting to elderly units, elderly/disabled units converting to elderly only units) are subject to a front-end civil rights review by HUD pursuant to the RAD Notice and Section 5.3(A). A PHA must demonstrate that the proposed change in occupancy type is consistent with the demand for affordable housing in its jurisdiction as demonstrated by factors such as the demographics of its current occupancy, the demographics of its waiting list or a market study. Such preferences, restrictions, or geographic residency preferences must be reflected in a PBRA project's Affirmative Fair Housing Marketing Plan (AFHMP) or, for a PBV project, the PHA's Administrative Plan.

**5.7. Other Front-End Civil Rights Review for RAD Transactions**

*A) Conversions of Assistance in Which the Construction Schedule Indicates that Relocation is Likely to Exceed 12 Months.*

The front end civil rights review shall focus on whether the relocation will result in discrimination on the basis of race, color, national origin, religion, sex, disability, and familial status, based primarily, but not exclusively, on the data required in the Checklist.

*B) Conversions of Assistance Involving New Construction or Substantial Alteration, as those terms are defined by Section 504.*

While the PHA is responsible for compliance with all requirements described in Section 4, above and in this subsection, the front-end review will be conducted based on a review of the Checklist and shall include confirming the provision of any required accessible units and confirming the PHA is applying the appropriate accessibility standards. HUD will require the PHA to provide information regarding the provision of at least the minimum number of units accessible for persons with mobility impairments and units accessible for persons with hearing and vision impairments as required by applicable law (generally 5% of units accessible for persons with mobility impairments and an additional 2% of units accessible for persons with hearing and vision impairments). For purposes of establishing an upper threshold of accessible units below which RAD front-end review will not be required, HUD will accept that up to 10% of units accessible for persons with mobility impairments and up to 4% of units accessible for persons with hearing and vision impairments is consistent with local need, without further review, absent information to the contrary. HUD will consider a PHA's request for higher percentages based, to HUD's satisfaction, on reliable indicators of local need, such as census data or other available current data. HUD is available to assist PHAs in determining appropriate indicators of local

need for units with accessible features. The RAD conversion scope of work submitted with the Financing Plan must reflect the construction or retrofitting of residential units and public and common use areas to comply with all applicable accessibility requirements.

*C) Remedial Agreements and Orders.*

Front-end review in situations where the Converting Project or PHA is subject to enforcement actions or binding voluntary compliance agreements, settlement agreements, conciliation agreements, or consent decrees or orders of the nature described in Sections 5.3(A)(8) and 5.3(A)(9) shall be conducted on a case-by-case basis as appropriate to the specific situation.

**5.8. Affirmative Fair Housing Marketing Plan (AFHMP) Requirements for Projects Converting to PBRA Assistance**

For all projects converting to PBRA assistance, a PHA or Project Owner must complete form HUD-935.2A, the Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing, and submit it to HUD for approval with the RAD Financing Plan.<sup>64</sup> Affirmative Fair Housing Marketing requirements are designed to achieve a condition in which individuals of similar income levels in the same housing market area have similar housing choices available to them regardless of their race, color, national origin, religion, sex, disability, or familial status.<sup>65</sup> They are also a means to carry out the mandate of Section 808(e)(5) of the Fair Housing Act that HUD administer its programs and activities in a manner to affirmatively further fair housing. These requirements mandate that PHAs or Project Owners identify groups that are least likely to apply for upcoming housing opportunities and to implement special marketing and outreach activities to ensure that these groups are aware of these opportunities.

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

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

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<sup>64</sup> The most recent version of the AFHMP is HUD Form 935.2A, OMB Approval Number 2529-0013. *See* 24 C.F.R. § 880.601(a)(2) and 24 C.F.R. § 200.615; *see also* Section 10.8 of the Multifamily Accelerated Processing (MAP) Guide. The PHA or its management agent should consult the instructions in the form HUD 935.2A and HUD's Implementing Affirmative Fair Housing Marketing Requirements Handbook (HUD Handbook 8025.1) for guidance on completing the AFHMP and carrying out an affirmative marketing program. The Handbook provides a detailed resource on the content of the AFHMP, which includes marketing activities, residency preferences, and staff training.

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

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

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

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

## **SECTION 6. RELOCATION REQUIREMENTS**

In some cases, as explained in this Section, the activities associated with the RAD transaction may require the relocation of residents. In the event of acquisition, demolition, construction or rehabilitation activities performed in connection with a RAD conversion, the PHA and/or Project Owner<sup>66</sup> should plan such activities to reasonably minimize any disruption to residents’ lives, to ensure that residents are not exposed to unsafe living conditions and to comply with applicable relocation, fair housing and civil rights requirements. As discussed in Section 6.1, below, a written relocation plan is required in some circumstances and strongly encouraged for any conversion resulting in resident moves or relocation. Further, the obligations due to relocating residents under RAD are broader than URA relocation assistance and payments and RAD specifies requirements which are more protective of residents than standard URA requirements, including additional notices (see Section 6.6) and a right to return (see Section 6.2). This Notice requires that certain information be provided to all households, beginning prior to submission of the RAD application.

Any resident who moves as a direct result of acquisition, rehabilitation or demolition for an activity or series of activities associated with a RAD conversion may, depending on the circumstances and length of time of the relocation, be eligible for relocation assistance and payments under the URA. Additionally, Section 104(d) relocation and one-for-one replacement

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<sup>66</sup> Under the URA, the term “displacing agency” refers to the agency or person that carries out a program or project which will cause a resident to become a displaced person. Projects vary and, for any specific task described in this Notice, the displacing agency may be either the PHA or the Project Owner, as determined by the allocation of roles and responsibilities between the PHA and Project Owner.



housing requirements may also apply when CDBG- or HOME-funds are used in connection with a RAD conversion. The applicability of the URA or Section 104(d) to RAD conversions is fact-specific, which must be determined in accordance with the applicable URA and Section 104(d) regulations.<sup>67</sup>

Eligibility for specific protections under this Notice applies to any person residing in a Converting Project who is legally on the public housing lease, has submitted an application to be added to an existing lease, or is otherwise in lawful occupancy at the time of the issuance of the CHAP and at any time thereafter until conversion of assistance under RAD. All such residents of a Converting Project have a right to return and are eligible for relocation protections and assistance as provided by this Notice. The eligibility criteria set forth in this paragraph apply to the protections under this Notice regardless of whether residents or household members meet the statutory and regulatory requirements for eligibility under URA.<sup>68</sup>

## **6.1. Planning**

If there is a possibility that residents will be relocated as a result of acquisition, demolition, or rehabilitation for a Converting Project, PHAs must undertake a planning process in conformance with the URA statutory and regulatory requirements in order to minimize the adverse impact of relocation (*see* 49 § C.F.R. 24.205). PHAs must also ensure that their relocation planning is conducted in compliance with applicable fair housing and civil rights requirements.

The PHA shall prepare a written relocation plan if the RAD conversion involves permanent relocation (including, without limitation, a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than one year. While a written relocation plan is not required for temporary relocation lasting one year or less, HUD strongly encourages PHAs, in consultation with any applicable Project Owners, to prepare a written relocation plan for all RAD conversions to establish their relocation process clearly and in sufficient detail to permit consistent implementation of the relocation process and accurate communication to the residents. Appendix II contains recommended elements of a relocation plan.

During the planning stages of a RAD transaction and based on the results of this planning process, a PHA must submit applicable portions of the Checklist described in Section 5.3(B) to HUD, together with any required backup documentation, as early as possible once the information covered in the applicable part is known.<sup>69</sup> All parts of the Checklist must be submitted to HUD prior to submission of the Financing Plan. The Checklist will allow HUD to assist the PHA to comply, and to evaluate the PHA's compliance, with relocation requirements, including civil rights requirements related to relocation.

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<sup>67</sup> 42 U.S.C. § 4601 *et seq.*, 42 U.S.C. § 5304(d), and their implementing regulations at 49 C.F.R Part 24 and 24 C.F.R. Part 42 subpart C.

<sup>68</sup> A nonexclusive listing of persons who do not qualify as displaced persons under URA is at 49 C.F.R. 24.2(a)(9)(ii). See also, Paragraph 1-4(J) of HUD Handbook 1378. See Section 6.5 of this Notice for discussion of the date of "initiation of negotiations."

<sup>69</sup> The Checklist refers to the existing FHEO Accessibility and Relocation Checklist until a revised Checklist is approved for use pursuant to the Paperwork Reduction Act.

The following presents a general sequencing of relocation planning activities within the RAD conversion process for informational and planning purposes only. Specific requirements are set forth in the provisions of this Notice.

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

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<sup>70</sup> Alternatively, the PHA may submit a new PHA Five-Year or Annual Plan, especially if it is on schedule to do so. Under any scenario, the PHA must consult with the Resident Advisory Board and undertake the community participation process.

Stage	Activities
	described in Section 6.6(C) through 6.6(E) of this Notice at this time.
5. From RAD Conversion Commitment (RCC) to Closing	<ul style="list-style-type: none"> <li>• Meet with residents to describe approved conversion plans and discuss required relocation.</li> <li>• The effective date of the RCC marks the date of “Initiation of Negotiations” (ION), as defined in the URA (49 § C.F.R. 24.2(a)(15)).</li> <li>• If no NOIA was provided while preparing the Financing Plan, provide residents with appropriate relocation notices as described in Section 6.6(C) through 6.6(E) of this Notice.</li> <li>• Resident relocation may begin following the effective date of the RCC, subject to applicable notice requirements.</li> </ul>
6. Post-Closing	<ul style="list-style-type: none"> <li>• Ongoing implementation of relocation</li> <li>• Notify the residents regarding return to the Covered Project as described in Section 6.6(F) of this Notice</li> <li>• Implementation of the residents’ right to return</li> </ul>

**6.2. Resident Right to Return**

Any public housing or Section 8 assisted resident that may need to be relocated temporarily to facilitate rehabilitation or construction has a right to return to an assisted unit at the Covered Project once rehabilitation or construction is complete.<sup>71</sup> Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a project’s conversion of assistance. The Project Owner satisfies the RAD right to return to a Covered Project if the Project Owner offers the resident household either: a) a unit in the Covered Project in which the household is not under-housed; or b) a unit in the Covered Project which provides the same major features as the resident’s unit in the Converting Project prior to the implementation of the RAD conversion. In the case of a transfer of assistance to a new site, residents of the Converting Project have the right to reside in an assisted unit meeting the requirements set forth in this paragraph at the Covered Project (the new site) once the Covered Project is ready for occupancy in accordance with applicable PBV or PBRA requirements.

If proposed plans for a Converting Project would preclude a resident from returning to the Covered Project, the resident must be given an opportunity to comment and/or object to such plans. Examples of project plans that may preclude a resident from returning to the Covered Project include, but are not limited to:

- Changes in bedroom distribution which decrease the size of units such that the resident would be under-housed;<sup>72</sup>

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<sup>71</sup> The right to return is not a right to any specific unit in the Covered Project. Tenancies other than public housing or Section 8 assisted residents (such as commercial tenants) do not hold a right to return and are subject to standard relocation requirements applicable to such tenants under the URA.

<sup>72</sup> See the RAD Notice for a description of the procedures that must be undertaken if a resident is over-housed.

- Where a) the PHA is reducing the number of assisted units at a property (if authorized to do so under Section 1.5.B of the RAD Notice) and b) the resident cannot be accommodated in the remaining assisted units;
- The imposition of income eligibility requirements, such as those associated with LIHTC or other program financing, under which the current resident may not be eligible;<sup>73</sup> and
- Failure to provide reasonable accommodation to an individual with disabilities, in violation of applicable law, which reasonable accommodation may include installation of accessibility features that are needed by the individual with disabilities.<sup>74</sup>

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

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

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

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

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<sup>73</sup> In these cases, a PHA may elect to exclude some units from the applicable financing program, for example, claiming LIHTC for a subset of the units and not claiming tax credits in connection with the units occupied by households over the LIHTC maximum eligibility of 60% of AMI.

<sup>74</sup> Refer to the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Reasonable Modifications Under the Fair Housing Act (March 5, 2008), at [http://www.hud.gov/offices/fheo/disabilities/reasonable\\_modifications\\_mar08.pdf](http://www.hud.gov/offices/fheo/disabilities/reasonable_modifications_mar08.pdf) for additional detail regarding applicable standards for reasonable accommodations and accessibility features which must be provided. If the resident has paid for installation of accessibility features in the resident's prior unit, the PHA or Project Owner shall pay for the installation of comparable features in the new unit. Violations of law may also result in other sanctions.

Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and Titles II and III of the Americans with Disabilities Act.

### **6.3. Admissions and Continued Occupancy Requirements**

Resident households may not be denied relocation housing or the right to return based on rescreening, income eligibility, or income targeting. PHAs may only offer housing options with screening, income eligibility or income targeting requirements if the impacted residents meet the admission and occupancy policies applicable to such housing. However, whether or not in a temporary relocation situation, the household remains subject to the applicable program policies regarding continued occupancy of an assisted unit by an incumbent resident of the unit.

### **6.4. Types of Moves and Relocation**

Any time project plans require a resident to move from their current unit, the resident is eligible for assistance as described in this Notice. Assistance may vary depending on the options provided to residents, whether the relocation is temporary or permanent and, if applicable, the length of time the resident is in temporary accommodations.<sup>75</sup> In all circumstances, the move or relocation must be in compliance with applicable requirements of this Notice and consistent with applicable fair housing and civil rights requirements. Each type of move is discussed below.

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

Temporary or permanent moves within the same building or complex of buildings may be appropriate given the extent of work to be completed to permit phasing of rehabilitation or construction. Moves within the same building or complex of buildings are not considered relocation under RAD and a tenant generally does not become displaced under the URA. Whether permanent (i.e., the tenant will move to and remain in an alternative unit) or temporary (i.e., the tenant will move to another unit and return to their original unit), the PHA or Project Owner must reimburse residents for all reasonable out-of-pocket expenses incurred in connection with any move and all other terms and conditions of the move(s) must be reasonable.<sup>77</sup> The final move must be to a unit which satisfies the right to return requirements specified in Section 6.2 of this Notice.

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<sup>75</sup> PHAs should note that the definitions of “permanent” vary between the URA and RAD. For example, “permanent displacement” under the URA includes moves from the original building or complex of buildings lasting more than one year. The RAD Notice, meanwhile, considers “permanent relocation” to be separation from the RAD-assisted unit upon completion of the conversion and any associated rehabilitation and construction. The duration of a temporary move may exceed one year. In the case of a transfer of assistance, it is not permanent relocation under RAD when the resident must move from the original complex of buildings to the destination site in order to retain occupancy of the RAD-assisted unit.

<sup>76</sup> An example of relocation within the same building or complex of buildings would be if one floor of a multi-story building is vacant, and the PHA is moving residents from another floor to the vacant units.

<sup>77</sup> Failure to reimburse residents for moving or other out-of-pocket expenses and any other terms and conditions of the move which may be unreasonable may result in the resident becoming a displaced person under the URA if the resident subsequently moves from the property.

*B) Temporary relocation lasting one year or less*

If a resident is required to relocate temporarily, to a unit not in the same building or complex of buildings, for a period not expected to exceed one year in connection with the RAD conversion, the resident's temporarily occupied housing must be decent, safe, and sanitary and the resident must be reimbursed for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation. These expenses include, but are not limited to, moving expenses, increased housing costs (e.g., rent and utilities), meals if the temporary housing lacks cooking facilities (e.g., during a short hotel stay, whether or not on an emergency basis) and other applicable expenses.<sup>78</sup>

*C) Temporary relocation initially expected to last one year or less, but which extends beyond one year*

In the event that a resident has been temporarily relocated, to a unit not in the same building or complex of buildings, for a period which was anticipated to last one year or less but the temporary relocation in fact exceeds one year, the resident qualifies as a "displaced person" under the URA and as a result immediately becomes eligible for all permanent relocation assistance and payments as a "displaced person" under the URA, including notice pursuant to Section 6.6(E). This assistance would be in addition to any assistance the person has already received for temporary relocation, and may not be reduced by the amount of any temporary relocation assistance.

In such event, the PHA or Project Owner shall offer the resident the opportunity to choose to voluntarily permanently relocate with the offered URA assistance or to choose to remain temporarily relocated based on updated information from the PHA or Project Owner about when they can return to the completed RAD unit. The PHA or Project Owner must present this opportunity to the resident when the temporary relocation extends beyond one year and each time thereafter that the temporary relocation extends beyond the previously anticipated duration. In presenting such opportunity, the PHA or Project Owner must inform the resident in writing that his or her acceptance of voluntary permanent relocation, with the associated assistance, would terminate the resident's right to return to the Covered Project. The PHA or Project Owner must provide the resident with at least 30 days to decide whether to remain in temporary relocation status or to voluntarily relocate permanently.

*D) Temporary relocation anticipated to last more than one year*

When the PHA anticipates that the temporary relocation, to a unit not in the same building or complex of buildings, will last more than one year, but the resident is retaining the resident's right to return to the Covered Project, the resident is considered temporarily relocated under RAD and is eligible to receive applicable temporary relocation assistance and payments. Under the URA, the resident becomes eligible to receive applicable relocation assistance and payments as a "displaced person" when the temporary relocation period exceeds one year and each time thereafter that the temporary relocation extends beyond the previously anticipated duration, at

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<sup>78</sup> HUD Handbook 1378, Chapter 2, Section 2-7 governs activities subject to URA requirements and informs, but is not binding upon, any RAD activities not governed by the URA. PHAs may also refer to HUD Form 40030.

which time the PHA or Project Owner shall offer the resident the opportunity to choose to voluntarily permanently relocate or to remain temporarily relocated, as described in Section 6.4(C), above.

In order to allow residents to make the election earlier than required under the URA (thereby avoiding a year in temporary relocation housing prior to electing voluntary permanent relocation), if the PHA or Project Owner anticipates that temporary relocation will last more than one year, the PHA or Project Owner shall provide the resident with an initial option to (a) be temporarily relocated, retain the right to return to the Covered Project when a unit becomes available and receive assistance, including temporary housing and reimbursement for all reasonable out-of-pocket expenses associated with the temporary relocation, or (b) accept RAD voluntary permanent relocation assistance and payments equivalent to what a “displaced person” would receive under the URA. The PHA or Project Owner must inform the resident in writing that his or her acceptance of voluntary permanent relocation, with the associated assistance, would terminate the resident’s right to return to the Covered Project. The PHA or Project Owner must provide the resident with at least 30 days to decide whether to remain in temporary relocation status or to voluntarily relocate permanently.

*E) Permanent moves in connection with a transfer of assistance*

In cases solely involving a transfer of assistance to a new site, resident relocation from the Converting Project to the Covered Project is not, by itself, generally considered involuntary permanent relocation under RAD. However, the URA and/or Section 104(d) is likely to apply in most cases. In cases of a transfer of assistance to a new site where it has also been determined that the URA and/or Section 104(d) apply to the transfer of assistance, residents may be eligible for all permanent relocation assistance and payments for eligible displaced persons under the URA and/or Section 104(d). If the URA applies to a move of this type, the PHA or Project Owner must make available at least one, and when possible, three or more comparable replacement dwellings pursuant to 49 C.F.R. § 24.204(a). However, provided the transfer of assistance unit meets the URA definition of a comparable replacement dwelling pursuant to 49 C.F.R. § 24.2(a)(6), that unit could in fact represent the most comparable replacement dwelling as determined by the agency for purposes of calculating a replacement housing payment, if any, under 49 C.F.R. § 24.402.

Whether or not the URA and/or Section 104(d) apply, under RAD the residents are entitled to relocation assistance and payments, including counseling in preparation for the relocation, written notices of the relocation (including a 90-day RAD Notice of Relocation), and reimbursement for all reasonable out-of-pocket expenses, including moving expenses, incurred in connection with the move. It should be noted that the RAD relocation assistance and payments provided to transferring residents in this paragraph differ from those required under the URA and/or Section 104(d) as described above. Where both frameworks apply, the residents must receive the more extensive protections offered under either framework.

If HUD determines that the distance from the Converting Project to the site of the Covered Project is significant and the resident could not reasonably be required to move to the new site, then HUD will require the PHA to adjust project plans to accommodate the resident in an assisted unit (e.g., a public housing unit, some other project-based Section 8 unit or a market unit

with a housing choice voucher) within a reasonable distance of the site of the Converting Project. HUD will evaluate whether this requirement applies on a case by case basis, considering whether the distance would impose a significant burden on residents' access to existing employment, transportation options, schooling or other critical services. Accommodating the resident may also be satisfied by the resident's consent to an alternative housing option pursuant to Section 6.10. The requirement set forth in this paragraph is in addition to all protections, including, for example, the offer of comparable replacement dwellings, which are required in all instances where a transfer of assistance is subject to the URA and/or Section 104(d).

*F) Voluntary permanent relocation*

A resident may elect to relinquish their right of return and consent to voluntary permanent relocation pursuant to an alternative housing option offered and accepted according to the procedures described in Section 6.10, which Section specifies protections to ensure the resident's decision is fully informed. By selecting voluntary permanent relocation, the resident is electing to receive RAD permanent relocation assistance and payments which are equivalent to the relocation payments and assistance required to be provided to a "displaced person" pursuant to the regulations implementing the URA.

**6.5. Initiation of Negotiations (ION) Date**

Eligibility for URA relocation assistance is effective on the date of initiation of negotiations (ION) (49 C.F.R. § 24.2(a)(15)). For Converting Projects, the ION date is the effective date of the RCC. The ION date is also typically the date when PHAs can begin to issue RAD Notices of Relocation (except in the case of acquisitions when the PHA can issue a Notice of Intent to Acquire and RAD Notices of Relocation prior to the ION date). Any person who is in lawful occupancy on the ION date is presumed to be entitled to relocation payments and other assistance.

PHAs and Project Owners should note that prior to the ION date, a resident may be eligible as a displaced person for permanent relocation assistance and payments under the URA if HUD determines, after analyzing the facts, that the resident's move was a direct result of the project. However, resident moves taken contrary to specific instructions from the PHA or Project Owner (for example, contrary to instructions not to move if contained in a General Information Notice) are generally not eligible as a displaced person under the URA.

**6.6. Resident Relocation Notification (Notices)**

PHAs and Project Owners are encouraged to communicate regularly with the residents regarding project plans and, if applicable, the resulting plans for relocation. When residents may be relocated for any time period (including, without limitation, a move in connection with a transfer of assistance), written notice must be provided to the resident heads of households, including the notices listed below as applicable.<sup>79</sup> PHAs and Project Owners are also encouraged to provide

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<sup>79</sup> The notices required under Sections 6.6(B) through 6.6(E) must be delivered in accordance with URA resident notification requirements, including the requirement that the notice be personally served or delivered by certified or registered first class mail return receipt requested. All notices must be delivered to each household (i.e., posting in



additional relocation notices and updates for the residents' benefit as appropriate for the specific situation.

To ensure that all residents understand their rights and responsibilities and the assistance available to them, consistent with URA requirements at 49 C.F.R. § 24.5 and civil rights requirements, PHAs and Project Owners must ensure effective communication with individuals with disabilities, including through the provision of appropriate auxiliary aids and services, such as interpreters and alternative format materials. Similarly, PHAs and Project Owners are required to take reasonable steps to ensure meaningful access for LEP persons in written and oral materials. Each notice shall indicate the name and telephone number of a person to contact with questions or for other needed help and shall include the number for the telecommunication device for the deaf (TDD) or other appropriate communication device, if applicable, pursuant to 24 C.F.R. §8.6(a)(2).

The purpose of these notifications is to ensure that residents are informed of their potential rights and, if they are to be relocated, of the relocation assistance available to them. Two initial notices launch this effort and provide critical information regarding residents' rights. The first, the RAD Information Notice, is to be provided at the very beginning of the RAD conversion planning process in order to ensure residents understand their rights, to provide basic program information and to facilitate residents' engagement with the PHA regarding project plans. The GIN, meanwhile, provides information specifically related to protections the URA provides to impacted residents. Subsequent notices provide more detailed information regarding relocation activities specific to the household, including tailored information regarding eligibility and timelines for relocation.

PHAs should note that a resident move undertaken as a direct result of the project may be eligible to receive relocation assistance and payments under the URA even though the PHA has not yet issued notices to them. Sample notices which may be used as-is or modified to fit the peculiarities of each situation are provided on the RAD website at [www.hud.gov/rad](http://www.hud.gov/rad).

A) *RAD Information Notice*

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

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

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

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

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

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

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

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

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

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

For conversions involving acquisition, the Project Owner (the "acquiring agency") may provide to residents of the Converting Project a Notice of Intent to Acquire (NOIA).<sup>80</sup> The NOIA may be provided no earlier than 90 days prior to the PHA's reasonable estimate of the date of submission of a complete Financing Plan. While eligibility for URA relocation assistance is generally effective on the effective date of the RCC (the ION date), a prior issuance of a NOIA establishes a resident's eligibility for relocation assistance and payments on the date of issuance of the NOIA and prior to the ION date.

*D) RAD Notice of Relocation*

If a resident will be relocated to facilitate the RAD conversion, the PHA shall provide written notice of such relocation by means of a RAD Notice of Relocation. The RAD Notice of

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<sup>80</sup> Acquisition includes a new ownership entity's purchase of the Covered Project from the PHA, such as a purchase by a single purpose entity, an affiliate or a low-income housing tax credit ownership entity.

Relocation may not be issued until: 1) the effective date of the RCC (the ION date) if the conversion does not involve acquisition; or 2) the earlier of the issuance of the Notice of Intent to Acquire (see Section 6.6(C)) or the effective date of the RCC (the ION date) if the conversion involves acquisition. Prior to issuance of the RAD Notice of Relocation, PHAs and Project Owners should meet with each resident household to provide preliminary relocation advisory services and to determine their needs and preferences.<sup>81</sup>

A RAD Notice of Relocation is not required for residents who will not be relocated. As a best practice, PHAs or Project Owners should notify residents that they are not being relocated once that determination has been made if they were previously informed by the GIN and/or by other methods that relocation was a possibility.<sup>82</sup>

A RAD Notice of Relocation shall provide either: 1) 30-days' notice to residents who will be relocated for twelve months or less; or 2) 90-days' notice to residents who will be relocated for more than twelve months.<sup>83</sup> The RAD Notice of Relocation must conform to the following requirements:

- (1) The notice must state the anticipated duration of the resident's relocation.
- (2) The notice must specify which entity (the PHA or the Project Owner) is primarily responsible for management of the resident's relocation and for compliance with the relocation obligations during different periods of time (i.e., before vs. after Closing).
- (3) For residents who will be relocated for twelve months or less:
  - The PHA or Project Owner must provide this notice a minimum of 30 days prior to relocation.<sup>84</sup> PHAs or Project Owners may deem it appropriate to provide longer notice periods for persons who will be temporarily relocated

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<sup>81</sup> PHAs and Project Owners should note the URA relocation advisory services requirement for personal interviews. *See* Section 6.7 of this Notice. In sequencing the RAD Notice of Relocation, PHAs and Project Owners wishing to offer alternative housing options pursuant to Section 6.10 should also note the additional complexity in the timeline of notices. Pursuant to Section 6.10(D), the resident can consent to an alternative housing option only after issuance of the NOIA or the effective date of the RCC and 30 days after presentation of the alternative housing options. In some cases, for example, when the resident would not otherwise be relocated for over twelve months, the RAD Notice of Relocation must include both the information described in Section 6.6(D)(3) and the information in Section 6.6(D)(4). The PHA or Project Owner should consider discussing the alternative housing options prior to issuing the RAD Notice of Relocation so that the RAD Notice of Relocation can be tailored to the resident's situation.

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

<sup>83</sup> The 90-day notice is required for residents relocated for more than twelve months, whether or not they intend to return to the Covered Project and whether or not they are eligible for assistance and payments as a displaced person under URA. Recipients of the 90-day notice would include those residents who have voluntarily accepted a permanent relocation option as well as those residents who are relocated within the same building or complex of buildings.

<sup>84</sup> Note that residents may elect to move to the relocation housing before the 30 days have elapsed. However, a PHA may not require a resident to move prior to this time.

for an extended period of time (over 6 months), or if necessary due to personal needs or circumstances.

- The notice must explain that the PHA or Project Owner will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with any temporary move (including, but not limited to, increased housing costs and moving costs).
  - The notice must explain the reasonable terms and conditions under which the resident may exercise the right to return to lease and occupy a unit in the Covered Project.
- (4) For residents who will be relocated for more than twelve months, including for residents who may wish to voluntarily accept a permanent relocation option:
- The PHA or Project Owner must provide this notice a minimum of 90 days prior to relocation of residents.<sup>85</sup>
  - The notice must offer the choice to be temporarily relocated, thereby preserving the resident's right to return, or the choice to be voluntarily permanently relocated pursuant to the procedures set forth in Section 6.10, together with guidance that the resident has at least thirty (30) days to consider the choice.
  - For residents who voluntarily elect to be permanently relocated, the 90-day notice period may only begin once the PHA or Project Owner has made available at least one comparable replacement dwelling consistent with 49 C.F.R. § 24.204(a).<sup>86</sup>
  - The notice must describe the available relocation assistance, the estimated amount of assistance based on the individual circumstances and needs, and the procedures for obtaining the assistance. The notice must be specific to the resident and his or her situation so that the resident will have a clear understanding of the type and amount of payments and/or other assistance the resident household may be entitled to claim.
  - The notice must comply with all requirements for a URA Notice of Relocation Eligibility as described in 49 C.F.R. § 24.203(b).
- (5) The notice must inform the resident that the relocation will be completed consistent with fair housing and civil rights requirements, and it must provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

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

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<sup>85</sup> Note that residents may elect to move to the relocation housing before the 90 days have elapsed. However, a PHA may not compel a resident to move prior to this time.

<sup>86</sup> PHAs should note that URA regulations also require, where possible, that three or more comparable replacement dwellings be made available before a resident is required to move from his or her unit.

*E) URA Notice of Relocation Eligibility – for residents whose temporary relocation exceeds one year (49 C.F.R. § 24.203(b))*

After a resident has been temporarily relocated for one year, notwithstanding a prior issuance of a RAD Notice of Relocation, the PHA or Project Owner must provide an additional notice: the notice of relocation eligibility in accordance with URA requirements (“URA Notice of Relocation Eligibility”). The URA Notice of Relocation Eligibility is not required if the resident has already accepted permanent relocation assistance.<sup>87</sup>

The URA Notice of Relocation Eligibility must conform to URA requirements as set forth in 49 C.F.R. part 24 and shall:

- Provide current information as to when it is anticipated that the resident will be able to return to the Covered Project.
- Give the resident the choice to remain temporarily relocated based upon the updated information or to accept permanent URA relocation assistance at that time instead of exercising the right to return at a later time.

If the resident chooses to accept permanent URA relocation assistance and this choice requires the resident to move out of their temporary relocation housing, the URA requires that the PHA or Project Owner make available at least one, and when possible, three or more comparable replacement dwellings pursuant to 49 C.F.R. § 24.204(a), which comparability analysis is in reference to the resident’s original unit. The URA further requires that the resident receive 90 days’ advance written notice of the earliest date they will be required to move pursuant to 49 C.F.R. § 24.203(c).

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<sup>87</sup> To illustrate, consider the following examples.

- Example 1: The household is expected to be relocated for 11 months. The resident would receive a RAD Notice of Relocation offering only temporary relocation. Construction delays result in the extension of the relocation such that, in fact, it exceeds 12 months. When the temporary relocation exceeds 12 months, the resident must receive a URA Notice of Relocation Eligibility offering a choice between continuation in temporary relocation status and permanent relocation.
- Example 2: The household is expected to be relocated for 14 months. The resident would receive a RAD Notice of Relocation offering a choice between temporary relocation status and permanent relocation. If the household elects temporary relocation, the URA Notice of Relocation Eligibility is required as an additional notice following twelve months in temporary relocation status.
- Example 3: The household is expected to be relocated for 14 months. The resident would receive a RAD Notice of Relocation offering a choice between temporary relocation status and permanent relocation. If the household elects permanent relocation, the URA Notice of Relocation Eligibility is not required.
- Example 4: The household can be accommodated with temporary relocation of 3 months, but has been offered and seeks to accept permanent relocation pursuant to an alternative housing option. This resident would receive a RAD Notice of Relocation under Section 6.6(D)(4) offering a choice between temporary relocation status (the default option) and permanent relocation (the alternative housing option), instead of the RAD Notice of Relocation under Section 6.6(D)(3) which would be expected absent a permanent relocation option. The URA Notice of Relocation Eligibility is not required in either case because a temporary relocation exceeding 12 months was never anticipated nor experienced.

#### *F) Notification of Return to the Covered Project*

With respect to all temporary relocations, the PHA or Project Owner must notify the resident in writing reasonably in advance of the resident's expected return to the Covered Project, informing the resident of:

- The entity (the PHA or the Project Owner) with primary responsibility for managing the resident's relocation;
- The address of the resident's assigned unit in the Covered Project and, if different from the resident's original unit, information regarding the size and amenities of the unit;
- The date of the resident's return to the Covered Project or, if the precise date is not available, a reasonable estimate of the date which shall be supplemented with reasonable additional notice providing the precise date;
- That the PHA or Project Owner will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with the return relocation; and
- The resident's options and the implications of those options if the resident determines that he or she does not want to return to the Covered Project and wants to decline the right of return.<sup>88</sup>

Reasonable advance notice shall be 15% of the duration of the resident's temporary relocation or 90 days, whichever is less. For short-term relocations, the PHA or Project Owner may include this information within the RAD Notice of Relocation.

#### **6.7. Relocation Advisory Services**

Throughout the relocation planning process, the PHA and Project Owner should be in communication with the residents regarding the evolving plans for relocation. Notwithstanding this best practice, certain relocation advisory services, described below, are required by the URA.

The URA regulations require the PHA or Project Owner to carry out a relocation assistance advisory program that includes specific services determined to be appropriate to residential or nonresidential displacements. The specific advisory services to be provided, as determined to be appropriate, are outlined at 49 C.F.R. § 24.205(c). For residential displacement under the URA, a personal interview is required for each displaced resident household to determine the relocation needs and preferences of each resident to be displaced. The resident household shall be provided an explanation of the relocation payments and other assistance for which the resident may be eligible, the related eligibility requirements, and the procedures for obtaining such assistance. Advisory counseling must also inform residents of their fair housing rights and be carried out in

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<sup>88</sup> If the resident declines to return to the Covered Project upon completion of the period of temporary relocation, the resident shall be considered to have voluntarily moved out of the property, without the benefit of further relocation assistance. For example, a PHA or Project Owner may have rented a market-rate apartment as a temporary relocation resource for a six-month period. In such a situation, the resident may decline to return to the Covered Project and choose to remain in the market-rate apartment at the expiration of the six-month period, but shall not be eligible for any further relocation assistance and payments (including rent differential payments) under this Notice, the URA or Section 104(d), if applicable, in connection with the resident's decision to remain in the temporary housing and not return to the Covered Project.

a manner that satisfies the requirements of Title VI of the Civil Rights Act of 1964, the Fair Housing Act, and Executive Order 11063 (49 C.F.R. § 24.205(c)(1)).<sup>89</sup> Such advisory services under the URA may include counseling to ensure that residents affected by the project understand their rights and responsibilities and the assistance available to them (49 C.F.R. § 24.205(c)). In addition, the PHA or Project Owner should inform residents that if they believe they have experienced unlawful discrimination, they may contact HUD at 1-800-669-9777 (Voice) or 1-800-927-9275 (TDD) or at <http://www.hud.gov>.

## **6.8. Initiation of Relocation**

PHAs and Project Owners **may not initiate any involuntary physical relocation until both the RCC is in effect and the applicable RAD Notice of Relocation period has expired** (i.e., after either 30 or 90 days' notice as applicable depending on nature of the relocation, as described above). This prohibition applies to all types of RAD transactions, regardless of whether the RAD Notice of Relocation is provided after issuance of a NOIA (for conversions involving acquisition) or following the effective date of the RCC (for all other conversions). PHAs are advised to account for the required 30-day or 90-day written notice periods in their planning process, to ensure that notices which satisfy all applicable requirements are issued prior to taking any action to initiate relocation.

**Neither involuntary nor voluntary relocation for the project shall take place prior to the effective date of the RCC**, unless moves are authorized under Section 7, below (“Applicability of HCV and Public Housing Requirements”) or unless HUD provides explicit approval which will only be provided in extraordinary circumstances. The PHA must wait until the RAD Notice of Relocation period has expired before it may initiate any involuntary relocation. However, a resident may request to move voluntarily, and the PHA may honor a resident’s request to move, before the applicable 30-day or 90-day period has elapsed, provided that the PHA may not take any action to encourage or coerce a resident to make such a request. If a resident has elected an alternative housing option, PHAs are advised to ensure that any consent to voluntary permanent relocation does not expire prior to the date of the relocation, as described in Section 6.10.

HUD may use administrative data to identify and investigate projects where relocation may be occurring prior to RCC.

## **6.9. Records and Documentation; Resident Log**

HUD may request from the PHA or Project Owner written records and documentation in order to evidence the PHA’s and/or Project Owner’s compliance, as applicable, with this Notice and the URA.<sup>90</sup> HUD may request to review some or all of such records in the event of compliance

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<sup>89</sup> For example, under fair housing and civil rights laws, the PHA and Project Owner may be required to inform residents about and provide reasonable accommodations for individuals with disabilities, such as search assistance; take appropriate steps to ensure effective communication with individuals with disabilities, such as through the provision of auxiliary aids and services, such as interpreters and alternate format documents; provide advisory counseling services in accessible locations and in an accessible manner for individuals with disabilities; and take reasonable steps to ensure meaningful access for LEP persons. See Section 4 of this Notice for more information on these requirements.

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



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

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

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

- Date of the GIN
- Date of the CHAP
- Date of NOIA
- Date of RAD Notice of Relocation
- Date of URA Notice of Relocation Eligibility
- Date of most recent consent to voluntary permanent relocation<sup>91</sup>
- Date of relocation away from the Converting Project or Covered Project
- Dates of any intermediate relocation moves
- Date of return to the Covered Project or to the household's post-closing permanent address.<sup>92</sup>
- The following information for each resident household, as applicable:
  - The type of move (e.g., the types identified in Section 6.4, above)
  - The form of any temporary relocation housing (e.g., hotel, assisted housing, market-rate housing)
  - The address and unit size of any temporary relocation housing
  - Whether alternative housing options were offered consistent with Section 6.10, below
  - Any material terms of any selected alternative housing options
  - The type and amount of any payments for
    - Moving expenses to residents and to third parties
    - Residents' out-of-pocket expenses
    - Rent differential payments or other payments for temporary or permanent rental assistance, together with the rent and utilities (if applicable) that were the basis for the calculations
    - Any other relocation-related compensation or assistance

## **6.10. Alternative Housing Options**

Under the RAD Notice, “involuntary permanent relocation” is prohibited and each resident must be able to exercise his or her right of return to the Covered Project. A PHA or Project Owner is permitted to offer a resident alternative housing options when a resident is considering his or her future housing plans, provided that at all times prior to the resident's decision, the PHA and Project Owner preserve the resident's ability to exercise his or her right of return to the Covered Project.

### *A) Requirements for Any Offer of Alternative Housing Options*

All residents who are similarly situated must be given the same offer of alternative housing options. If the PHA or Project Owner seeks to limit the number of households that accept the

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

<sup>92</sup> In the case of voluntary permanent relocation, the date of “return” may be the same as the date of relocation away from the Converting Project.

offer of alternative housing options, the PHA or Project Owner shall determine a fair and reasonable method for selection among similarly situated residents.<sup>93</sup>

In connection with any offer and acceptance of alternative housing options, the PHA or Project Owner must ensure that the residents' decisions are: 1) fully informed; 2) voluntary; and 3) carefully documented. Any alternative housing option must include, at a minimum, all relocation assistance and payments required under this Notice, the URA and Section 104(d), as applicable, and may include other elements. Funds administered by HUD may not be used to pay any monetary elements not required under this Notice, the URA or Section 104(d).

Acceptance of an alternative housing option is considered voluntary permanent relocation and the accompanying RAD relocation assistance and payments for which the resident may be eligible must be administered in accordance with all requirements for an eligible displaced person under the URA and its implementing regulations and, where applicable, Section 104(d) and its implementing regulations.

PHAs may not propose or request that a displaced person waive rights or entitlements to relocation assistance under the URA or Section 104(d). The PHA must provide a written notice of URA or Section 104(d) relocation assistance and payments for which the resident may be eligible so that the resident may make an informed housing choice. The resident must be provided at least thirty (30) days to consider the offer of voluntary permanent relocation and the resident's acceptance of the PHA's offer of voluntary permanent relocation must be in writing signed by the head of the household for that unit.

#### *B) Assisted Housing Options as Alternatives*

Alternative housing option packages may include a variety of housing options and PHAs and Project Owners shall take particular care to ensure program compliance with the regulations applicable to the alternative housing options. Examples of alternative housing options may include:

- Transfers to public housing
- Admission to other affordable housing properties subject to the program rules applicable to such properties
- Housing Choice Vouchers (HCVs) subject to standard HCV program administration requirements. PHAs must operate their HCV programs, including any HCVs offered as an alternative housing option, in accordance with their approved policies as documented in their Section 8 Administrative Plan and HUD regulations at 24 C.F.R. part 982. Any offer of an HCV as an alternative housing option must be made consistent with the

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<sup>93</sup> For example, if the RAD conversion is financed by LIHTC and a few residents would not meet LIHTC program requirements, the PHA and Project Owner may want to offer these household alternative voluntary permanent relocation options. However, they must offer the same alternative housing options to all such households. As a second example, if the PHA and Project Owner seek to create two on-site vacancies of a particular unit size in order to facilitate temporary relocation on-site, the PHA may offer an alternative housing option of a housing choice voucher to all residents of applicably sized units (assuming that to do so is consistent with the PHA's voucher administration policies), and conduct a lottery to select the two households which will receive the vouchers.

PHA's admission preferences and other applicable policies and procedures set forth in the Section 8 Administrative Plan.

- Homeownership programs subject to the applicable program rules
- Other options as may be identified by the PHA and/or Project Owner

*C) Monetary Elements Associated With Alternative Housing Options*

A PHA or a Project Owner may include a monetary element in an alternative housing option package, provided that:

- Any monetary element associated with the alternative housing option shall be completely distinct from and in addition to any required RAD, URA or Section 104(d) relocation payments and benefits for which the resident is eligible ("Required Relocation Payments").
- No funds administered by HUD may be used to pay for any monetary element associated with the alternative housing option other than Required Relocation Payments.
- Any monetary element associated with the alternative housing option other than Required Relocation Payments must be the same amount offered to all similarly situated households.<sup>94</sup>
- Any alternative housing option package must comply fully with the disclosure and agreement provisions of this Notice.

*D) Disclosure and Agreement to Alternative Housing Options*

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

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<sup>94</sup> Monetary payments other than Required Relocation Payments are considered "temporary, nonrecurring or sporadic income" pursuant to 24 C.F.R. § 5.609(c)(9) and consequently are excluded from income for purposes of eligibility and assistance calculations under certain HUD programs. Residents should be reminded that monetary payments other than URA relocation payments may be taxable under the Internal Revenue Code, that monetary payments, including required relocation payments, may affect residents' eligibility for other assistance programs and that the resident should seek knowledgeable guidance on these matters, including guidance on the taxation of monetary payments under state law.

<sup>95</sup> In the case of a transfer of assistance to a new site a significant distance from the Converting Project as described in Section 6.4(E), the resident shall be informed of the resident's right to return to the Covered Project at the new site and of the resident's right to an assisted unit within a reasonable distance of the site of the Converting Project, as described in Section 6.4(E).

The written notification may request written consent from the resident to exercise the alternative housing option and receive permanent relocation assistance and payments pursuant to RAD, the URA and/or Section 104(d), as applicable, in addition to any benefits associated with the alternative housing option. As part of any voluntary consent, the resident head of household must acknowledge in writing that acceptance of such assistance terminates the resident's right to return to the Covered Project. In order to ensure that the resident has sufficient time to seek advice and consider the alternative housing options, any consent to an alternative housing option executed within 30 days of the written presentation of the options shall be invalid.

Any offer of alternative housing options must be made in writing and the acceptance of the alternative must be voluntary and in writing. The offer of an alternative housing option must contain the following elements:

- The resident is informed of his or her right to return to the Covered Project and that neither the PHA nor the Project Owner can compel the resident to relinquish his or her right to return. The offer of alternative housing options must clearly state that acceptance of any alternative would relinquish the resident's right to return to the Covered Project.
- The offer of an alternative housing option must be accompanied by identification of comparable housing units which the resident may use to understand the nature of housing options available to them and the rent and estimated utility costs associated with such housing options. This information must also be accompanied by a reasonable estimate of any replacement housing payment or "gap payment" for which the resident may be eligible.
- The offer of an alternative housing option must be accompanied by information regarding moving payments and assistance that would be available if the resident exercises the right of return and if the resident accepts the alternative housing option.
- Residents must be offered advisory assistance to consider their options.
- To be fully informed, the offer must outline the implications and benefits of each alternative housing option being made available (i.e., of accepting each alternative housing option as compared to exercising his or her right to return) as well as a reasonable estimate of when the resident's relocation might occur. Implications and benefits include payment amounts, differences in rent calculations, differences in program rules, housing location, and potential long-term implications such as household housing expenses multiple years in the future.
- To be fully voluntary, the resident must have at least thirty (30) days following delivery of the written offer to consider their options. LEP persons must be provided a written translation of the offer and oral interpretation of any meetings or counseling in the appropriate language. In addition, PHAs must comply with their obligation to ensure effective communication with persons with disabilities.
- The resident cannot be asked to make a decision which will be implemented at a distant future time. Consequently, the resident may not provide written consent to an alternative housing option (and consequently, consent to voluntary permanent relocation) until after

the earlier of issuance of the NOIA or the effective date of the RCC.<sup>96</sup> If a resident signs a written consent to accept an alternative housing option, that written consent is valid for 180 days. If relocation (after the applicable notice periods) has not occurred within this 180 day period, then the PHA or Project Owner must secure a new consent to accept an alternative housing option. New relocation notices are generally not required.

- The acceptance must be in writing signed by the resident head of household, including a certification of facts to document that the household is relinquishing its right to return and that the decision and the acceptance of the alternative housing option was fully informed and voluntary.
- Residents accepting alternative housing options to relinquish their right to return will be considered to have voluntarily and permanently relocated. Such residents are to be provided applicable RAD, URA and/or Section 104(d) relocation assistance and payments.

The information included with the offer of alternative housing options is to aid the resident in making decisions regarding the desirability of the alternative housing options and neither satisfies nor replaces the relocation notices and information required to be provided to residents pursuant to this Notice, the URA or Section 104(d).

While HUD does not require PHAs to submit documentation of alternative housing options offered to residents or the residents' elections, PHAs must keep auditable written records of such consultation and decisions. HUD may request this documentation at any time, including as part of a review of the Checklist or if relocation concerns arise.

### **6.11. Lump Sum Payments**

PHAs and Project Owners should note that certain relocation payments to displaced residential tenants may be subject to 42 USC § 3537c ("Prohibition of Lump-Sum Payments") and must be disbursed in installments. The PHA or Project Owner may determine the frequency of the disbursements which must be made in installments. Handbook 1378, Chapter 3-7(D) provides guidance on the manner and frequency of disbursing payments subject to this requirement.

Any monetary element beyond Required Relocation Payments which may be associated with an alternative housing option described in Section 6.10, above, is not relocation assistance and is therefore not subject to the requirements regarding lump sum payments.

## **SECTION 7. APPLICABILITY OF HCV AND PUBLIC HOUSING REQUIREMENTS**

### **7.1. HCV Waiting List Administration Unrelated to the RAD Transaction**

From time to time, a resident of a Converting Project may place themselves on the PHA's waiting list for HCVs independent of any planned RAD transaction. With respect to residents of a Converting Project prior to the effective date of the HAP contract, PHAs should continue to

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<sup>96</sup> The PHA and Project Owner should note that securing resident consent to an alternative housing option may delay the issuance of the RAD Notice of Relocation. The RAD Notice of Relocation must be specific to whether the resident will be temporarily or permanently relocated.

administer their HCV waiting list in accordance with their Section 8 Administrative Plans. Residents who rise to the top of the HCV waiting list independent of any preference for relocating RAD residents or other RAD provisions and accept an HCV are not considered to be relocated as a result of the RAD conversion. Standard administration of the PHA's HCV waiting list is not considered relocation.

## **7.2. HCV Waiting List Administration Related to the RAD Transaction**

From time to time, a PHA may wish to use HCV resources as a relocation option in connection with a RAD transaction. In order to do so, a PHA must modify its Section 8 Administrative Plan to provide a preference for relocating RAD residents and the PHA is subject to Section 6.8 of this Notice relating to initiation of relocation. Further, if a PHA provides a preference for relocating RAD residents, the PHA must be explicit regarding the nature of the HCV as a relocation resource. If the PHA anticipates using the HCV as a temporary relocation resource, the PHA must recognize that it cannot rescind an HCV once issued to the resident (i.e., the family would have to voluntarily relinquish their voucher and may choose to remain in the HCV program indefinitely). The PHA must also provide a preference for admission to the Covered Project in order to satisfy the right to return. Alternatively, if the PHA anticipates using the HCV as a voluntary permanent relocation resources, the PHA must comply with the alternative housing options provisions of Section 6.10.<sup>97</sup>

## **7.3. Public Housing Transfers Unrelated to the RAD Transaction**

From time to time, a resident of a Converting Project may request a transfer to another public housing property independent of any planned RAD transaction. With respect to residents of a Converting Project prior to the effective date of the HAP contract, PHAs must continue to administer their admissions and occupancy procedures as adopted. Any prohibitions in this Notice on implementing relocation do not apply to residents requesting public housing transfers, moves pursuant to the Violence Against Women Act (VAWA)<sup>98</sup> or reasonable accommodation moves. Standard administration of the PHA's admissions and occupancy policy is not considered relocation.<sup>99</sup> Transfers not undertaken for the RAD project are not subject to URA. However, it is recommended that the PHA document the transfer carefully, including an acknowledgement by the resident that the transfer is not undertaken for the RAD project, is not

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<sup>97</sup> PHAs and Project Owners should note that while in most cases, there is no rent differential between the tenant paid rent in a public housing unit and in an HCV, there are some situations (such as flat rent households) where a difference does exist. Rental assistance payments under the URA are required if there is a difference between these two amounts.

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

<sup>99</sup> Standard administration of the PHA's admissions and occupancy policy is permitted. However, HUD is sensitive to concerns that discussion of the planned RAD conversion and construction activities may cause residents to perceive a pressure to transfer without the counseling and moving assistance which would be available were the household to wait until relocation. If relocation at the Converting Project is planned, PHAs are strongly advised to document any such transfers carefully and to provide any households moving under standard admissions and occupancy policies with additional notices referencing the assistance and payments which would be available if the household were to remain in place until the relocation plan is implemented.

subject to URA requirements and that the resident is moving notwithstanding the guidance in the GIN or other relocation guidance from the PHA.

#### **7.4. Resident Initiated Public Housing Transfers Related to the RAD Transaction**

Pursuant to Section 1.8 of the RAD Notice, households in the Converting Project who do not want to transition to the Section 8 program may be offered, if available, the opportunity to move to other public housing owned by the PHA. Such move shall be implemented as a transfer and shall be prioritized equivalent to a “demolition, disposition, revitalization or rehabilitation transfer” as described in Section 11.2 of the applicable Public Housing Occupancy Guidebook. Transfers for this purpose do not require any modification to the PHA’s admissions and occupancy policy and may occur at any time pursuant to the PHA’s admissions and occupancy policy. Transfers for this purpose, while initiated by the resident, are the result of the PHA-initiated RAD transaction and the PHA must bear the reasonable costs of transfer. The reasonable cost of the transfer includes not just the cost of packing, moving, and unloading, but also the cost of disconnecting and reconnecting any existing resident-paid services such as telephone and cable television. The PHA must also document that the resident’s transfer request is fully informed and fully voluntary, which documentation must include an acknowledgement by the resident that the transfer is not undertaken at the request of the PHA or under pressure from the PHA, that the resident is moving notwithstanding the guidance in the GIN or other relocation guidance from the PHA and that the resident is withdrawing from participation in the RAD program and consequently losing rights, including the right to return, which accrue to residents participating in the RAD program. A public housing resident who voluntarily seeks a public housing transfer is generally not considered to be displaced under the URA or Section 104(d), where applicable.

#### **7.5. Public Housing as a Temporary Relocation Resource**

PHAs and Project Owners may wish to mitigate the relocation budget associated with the RAD conversion by using units within the PHA’s portfolio as relocation resources. In light of its mission to serve as many low-income households as possible, including its need to accommodate emergency transfers (such as moves pursuant to VAWA), the PHA should minimize the use of the public housing units not converting under RAD for temporary relocation of RAD impacted residents. HUD has a strong preference that the PHA use the units within the PHA’s Converting Projects as a temporary relocation resource prior to using units in the remainder of the PHA’s public housing portfolio. PHAs may elect not to lease units within the Converting Projects or, if necessary, the remainder of its portfolio, for this purpose only to the extent reasonably necessary to facilitate construction or rehabilitation.

Upon the effective date of the HAP contract (usually also the effective date of the RAD conversion), each resident of a Covered Project becomes a participant in the Section 8 program and is no longer part of the public housing program. A PHA may use public housing as a temporary relocation resource if approved by HUD, which approval shall depend on the proposed structure. PHAs wishing to use public housing units as a temporary relocation resource must consult with HUD’s Office of Public and Indian Housing (PIH) prior to the formal request for HUD approval. It is unlikely that HUD would approve a request to use public housing units



as a relocation resource for a period exceeding one year after the effective date of the HAP contract.

If HUD grants approval, HUD shall provide alternative requirements regarding PIH Information Center (PIC) documentation of the occupancy of these temporary relocation resources. PHAs must follow any guidance or instructions regarding treatment of the public housing units in HUD's data systems as may be provided from time to time.

PHAs and Project Owners should note that, absent written approval, if a resident seeks to occupy a public housing unit after the effective date of the HAP contract, the resident would need to be readmitted to public housing in a manner consistent with the waitlist and admissions policies and must exit the Section 8 program.

#### **7.6. Terminations (Including Evictions) and End of Participation Unrelated to the RAD Transaction**

Public housing program requirements related to continued occupancy and termination, including rules on grievances and related hearings, remain in effect until the effective date of a new PBV or PBRA HAP contract. If a resident is evicted in accordance with applicable state and local law and the eviction is not undertaken for the purpose of evading the obligation to make available RAD relocation and URA payments and other assistance, the resident is generally not entitled to relocation assistance and payments under this Notice or the URA (49 C.F.R. § 24.206). If a resident voluntarily ends his or her participation in the public housing program, in the absence of evidence that the end of participation was induced by the PHA for the purpose of evading the obligation to make available RAD relocation and URA payments and other assistance, the resident is generally not entitled to relocation assistance and payments under this Notice or the URA.

#### **7.7. Right-Sizing**

Public housing, PBV and PBRA requirements mandate that, upon the availability of a unit which is appropriate for the household size, the PHA or Project Owner must transfer a household that is under- or over-housed into the unit appropriate to the household's size. However, accommodating all residents pursuant to the right of return has primacy over right-sizing requirements and may, in some cases, require temporarily over-housing households. In such circumstances, the PHA or Project Owner shall subsequently transfer the household to an appropriate size unit when available, as is required by the applicable program regulation. Such actions shall be governed by the applicable program regulation and shall not be considered relocation under this Notice.

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

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Edward L. Golding  
Principal Deputy Assistant Secretary for  
Housing

**APPENDIX I: Applicable Legal Authorities**

**APPENDIX II: Recommended Relocation Plan Contents**

## **APPENDIX I: Applicable Legal Authorities**

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### **Part 1**

This Appendix to the Notice identifies key legal authorities with respect to fair housing, civil rights, and resident relocation. This Appendix is not exhaustive of applicable legal authorities, which authorities may also include other Federal statutes, regulations and Executive Orders, and civil rights provisions related to other programs (including funding programs) associated with the RAD transaction.

#### **Fair Housing Act (Title VIII of the Civil Rights Act of 1968, as amended)**

The Fair Housing Act, 42 U.S.C. § 3601 et seq., and its implementing regulations, 24 C.F.R. part 100, prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, disability, or familial status. The Fair Housing Act applies to for-sale and rental housing, whether the housing is privately or publicly funded, including housing supported by tax credits. Single family homes, condominiums, apartment buildings, time-shares, dormitories, transitional housing, homeless shelters that are used as a residence, student housing, assisted living housing, and other types of housing are all covered by the Fair Housing Act.

Among its substantive provisions, the Fair Housing Act requires “covered multifamily dwellings,” designed and constructed for first occupancy after March 13, 1991, to be readily accessible to and usable by persons with disabilities. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas are subject to the Act’s design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas are subject to the Act’s design and construction requirements.<sup>100</sup> In addition, the Fair Housing Act requires that housing providers make reasonable accommodations in rules, policies, and services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit, including public and common use areas, and that housing providers permit reasonable modifications of existing premises for persons with disabilities.

The Fair Housing Act also requires HUD to administer HUD programs and activities in a manner that affirmatively furthers fair housing (42 U.S.C. § 3608(e)(5)). HUD’s affirmatively furthering fair housing (“AFFH”) rule in 24 C.F.R. §§ 5.150-5.180 will apply to PHAs (except for qualified PHAs) for the PHA’s fiscal year that begins on or after January 1, 2018 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5. The affirmatively furthering fair housing regulations will apply to qualified PHAs, for the PHA’s fiscal year that begins on or after January 1, 2019 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5.<sup>101</sup>

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

<sup>101</sup> For purposes of the AFFH rule, “[a]ffirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing under the AFFH rule means taking meaningful actions that, taken together, address

Additional detail and discussion of the interplay between the Fair Housing Act, Section 504, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

#### United States Housing Act of 1937 (1937 Act)

The United States Housing Act of 1937 (1937 Act) (42 U.S.C. § 1437c-1(d)(15)) requires PHAs to submit a 5-year plan and an Annual Plan. Pursuant to HUD regulations, the Annual Plan includes a certification by the PHA that the PHA will affirmatively further fair housing.

#### Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*) and HUD's implementing regulation (24 C.F.R. part 1) prohibit recipients of Federal financial assistance from discriminating, excluding from participation, or denying benefits to, any person on the basis of race, color, or national origin. In addition, Title VI regulations prohibit HUD recipients of Federal financial assistance from utilizing criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin (24 C.F.R. § 1.4(b)(2)(i)). When determining the site or location of housing, recipients may not make selections with the purpose or effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination on the ground of race, color, or national origin (24 C.F.R. § 1.4(b)(3)). An applicant or recipient of HUD financial assistance also has an obligation to take reasonable action to remove or overcome the consequences of prior discriminatory practices regardless of whether the recipient engaged in discriminatory conduct (24 C.F.R. § 1.4(b)(6)).

Recipients of Federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities for persons who have limited ability to read, speak, or understand English – i.e., individuals who have limited English proficiency (LEP). This includes oral and written communications during relocation and throughout a RAD transaction. Such language assistance may include, but is not limited to, providing written translation of notices regarding the plans for the project and relocation and oral interpretation at meetings. Otherwise, LEP persons may be denied participation in, and the benefit of, the recipients' program or activity. On January 22, 2007, HUD issued "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (LEP Guidance), available at: [http://www.lep.gov/guidance/HUD\\_guidance\\_Jan07.pdf](http://www.lep.gov/guidance/HUD_guidance_Jan07.pdf).<sup>102</sup>

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

<sup>102</sup> See also Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, which requires recipients of Federal financial assistance to take reasonable steps to provide meaningful access to

### Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 provides: “No otherwise qualified individual with a disability in the United States . . . shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, service or activity receiving Federal financial assistance.”<sup>103</sup>

Among other things, HUD’s regulations implementing Section 504 (in 24 C.F.R. part 8) prohibit recipients of Federal financial assistance, in determining the site or location of a facility receiving such assistance, from making site selections the purpose or effect of which would (1) exclude qualified individuals with disabilities from or deny them the benefits of a program or activity, or otherwise subject them to discrimination; or (2) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities.<sup>104</sup> These prohibitions apply to both determining the site of permanent facilities and a site for relocation of residents.

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

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

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

<sup>103</sup> 29 U.S.C. § 794. HUD’s Section 504 regulation that applies to recipients of Federal financial assistance, including PHAs and Project Owners, is located at 24 C.F.R. part 8.

<sup>104</sup> 24 C.F.R. § 8.4(b)(5).

providing interpreters and alternate format documents (e.g., Braille, large print, accessible electronic communications) for persons with disabilities.

Additional detail and discussion of the interplay between Section 504, the Fair Housing Act, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

### Titles II and III of the Americans with Disabilities Act

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in all services, programs, and activities provided or made available by public entities. Title II of the ADA applies to housing developed or operated by state and local governments, which includes a PHA. Title III of the ADA prohibits discrimination on the basis of disability by public accommodations and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. For example, Title III applies to rental offices, sales offices, homeless shelters, hotels and motels, and commercial spaces associated with housing, such as daycare centers, social service offices, and sales and retail establishments. Titles II or III also will generally apply to community spaces and facilities, such as neighborhood networks, to computer centers (including the computers in the centers), and to transportation services and conveyances provided by PHAs and Project Owners.

Additional detail and discussion of the interplay between Titles II and III of the Americans with Disabilities Act, the Fair Housing Act, and Section 504 of the Rehabilitation Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

### Section 109

Section 109 of the Housing and Community Development Act of 1974 (HCDA of 1974), Title I, prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex in Community Development Block Grant (CDBG) programs and activities. Section 109 applies to RAD projects that receive CDBG or other assistance under Title I of the HCDA of 1974.

In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 to ensure that individuals are not subjected to discrimination on the basis of race, color, national origin, disability, age, religion, or sex by recipients of CDBG funds. Section 109 charges HUD with enforcing the right of individuals to live in CDBG-funded housing and participate covered programs and activities free from such discrimination. However, this additional statutory authority only applies to programs authorized under Title I of the HCDA of 1974, such as CDBG and programs, such as Section 108 loan guarantees and the Historically Black Colleges and Universities program.

### Equal Access to HUD-assisted or HUD-insured Housing

HUD requires its housing programs to be open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status. HUD recipients and subrecipients must comply with 24 C.F.R. § 5.105(a)(2) when determining eligibility for housing assisted with HUD

funds or subject to an FHA-insured mortgage, and when making such housing available. This includes making eligibility determinations and making housing available regardless of actual or perceived sexual orientation, gender identity, or marital status, and prohibiting inquiries about sexual orientation or gender identity for the purpose of making eligibility determinations or making housing available. Applicants are encouraged to become familiar with these requirements, HUD's definitions of sexual orientation and gender identity at 24 C.F.R. § 5.100, clarifications to HUD's definition of family at 24 C.F.R. § 5.403, and other regulatory changes made through HUD's Equal Access Rule, published in the Federal Register at 77 FR 5662 (Feb. 3, 2012).

### Section 3: Economic Opportunities for Low- and Very Low-income Persons.

Certain HUD programs require recipients of assistance to comply with Section 3 of the Housing and Urban Development Act of 1968 (Section 3), 12 U.S.C. § 1701u (Economic Opportunities for Low- and Very Low-Income Persons in Connection with Assisted Projects), and the HUD regulations at 24 C.F.R. part 135. The regulations at 24 C.F.R. part 135 implementing Section 3 ensure, to the greatest extent feasible, that training, employment, contracting and other economic opportunities be directed to low- and very low-income persons, especially recipients of government assistance for housing, and to businesses that provide economic opportunities to low- and very low-income persons where proposed project is located. Recipients of funds covered by Section 3 must comply with 24 C.F.R. part 135, particularly subpart B-Economic Opportunities for Section 3 residents and Section 3 Business Concerns, and Subpart E-Reporting and Recordkeeping. HUD encourages recipients to search the national Section 3 Business Registry to find local businesses that prioritize hiring Section 3 residents.

### Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 USC § 4601 *et seq.* (URA) is a Federal law that establishes minimum standards for programs or projects receiving Federal financial assistance that include the acquisition of real property (real estate) and/or displace persons from their homes, businesses, or farms as a result of acquisition, rehabilitation, or demolition.<sup>105</sup> The URA implementing Federal regulations can be found at 49 C.F.R. part 24. Project-Based Voucher (PBV) and Project-Based Rental Assistance (PBRA) are considered Federal financial assistance for purposes of the URA. As a result, the URA will apply to acquisitions of real property and relocation of persons from real property that occur as a direct result of acquisition, rehabilitation or demolition for a project that involves conversion of assistance to PBV or PBRA programs under RAD.

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<sup>105</sup> For additional guidance, see HUD Handbook 1378 Tenant Assistance, Relocation, and Real Property Acquisition), available at: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/comm\\_planning/library/relocation/policyandguidance/handbook1378](http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/library/relocation/policyandguidance/handbook1378).

## Section 104(d) of the Housing and Community Development Act of 1974

Section 104(d) of the Housing and Community Development Act of 1974, as amended, 42 USC § 5304(d), (Section 104(d)), is a Federal law that applies when a lower-income dwelling is demolished or converted (as conversion is defined in accordance with 24 C.F.R. § 42.305) to a use other than lower-income housing in connection with a Community Development Block Grant Program (CDBG) or HOME Investment Partnerships Program (HOME) funded activity. Under Section 104(d), a lower-income person is considered displaced and, therefore eligible for Section 104(d) relocation assistance if the person permanently moves from real property or permanently moves personal property from real property as a direct result of the demolition or conversion of a lower-income dwelling to a use other than lower-income dwelling unit in connection with a CDBG or HOME funded activity. The Section 104(d) one-for-one replacement housing requirements may apply with respect to occupied and vacant occupiable lower-income dwelling units that are demolished or converted to a use other than lower-income dwelling units in connection with CDBG or HOME funded activity. Section 104(d) implementing regulations can be found at 24 C.F.R. part 42, Subpart C. Additional HUD policy and guidance for Section 104(d) is available in HUD Handbook 1378, Chapter 7.

## **Part 2 – Accessibility Requirements**

Federal accessibility requirements apply to all RAD projects – whether they include new construction, alterations, or existing facilities. Applicable laws include, but are not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, and Titles II or III of the Americans with Disabilities Act (ADA). A PHA or Project Owner must comply with each law that applies to its project and with the requirement that provides the most accessibility when two or more laws apply. All three laws include new construction requirements. Substantial alterations, additions, rehabilitation and existing facilities must be in compliance with applicable requirements of Section 504 and the ADA.<sup>106</sup> All three laws may also require reasonable accommodations or modifications.

### Accessibility Requirements for New Construction

The Fair Housing Act requires all “covered multifamily dwellings” designed and constructed for first occupancy after March 13, 1991, to be readily accessible to and usable by persons with disabilities. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas must meet the Fair Housing Act’s design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas must meet the Fair Housing Act’s design and construction requirements. The Fair Housing Act requires that all covered multifamily dwellings be designed and constructed so that public and common use areas are readily accessible to and usable by persons with disabilities; all doors are sufficiently wide to allow passage by persons using wheelchairs; all units contain accessible routes into and through the dwelling unit; light switches, electrical outlets, thermostats, and other environmental controls are in accessible locations; reinforcements are installed in bathroom walls to allow later installation

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



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

New construction of a multifamily housing project containing five or more dwelling units is also subject to physical accessibility requirements under Section 504. Under Section 504, a “project” includes all residential and appurtenant structures, equipment, roads, walks, and parking lots which are covered by a single contract or application for Federal financial assistance, or are treated as a whole for processing purposes, whether or not they are located on a single site.<sup>109</sup> The accessibility standards for new construction under Section 504 are the Uniform Federal Accessibility Standards (UFAS).<sup>110</sup> HUD recipients may also use the 2010 ADA Standards for Accessible Design under title II of the ADA, except for certain specific identified provisions, as detailed in HUD’s Notice on “Instructions for use of alternative accessibility standard,” published in the Federal Register on May 23, 2014 (“Deeming Notice”). This option exists until HUD formally revises its Section 504 regulation to adopt an updated accessibility standard. Refer to HUD’s Deeming Notice for more information.

Section 504 also requires that a minimum of 5% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with mobility impairments. An additional 2% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with vision and hearing impairments.<sup>111</sup> HUD may prescribe a higher percentage or number of units upon request by any affected recipient or by any State or local government or agency based upon demonstration to the reasonable satisfaction of HUD of a need for a higher percentage or number, based on census data or other available current data, or in response to evidence of a need for a higher percentage or number received in any other manner. In reviewing such request or otherwise assessing the existence of such needs, HUD shall take into account the expected needs of eligible persons with and without disabilities.<sup>112</sup>

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

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

<sup>108</sup> For more information about the design and construction provisions of the Fair Housing Act, see [www.fairhousingfirst.org](http://www.fairhousingfirst.org). See also the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Accessibility (Design and Construction) Requirements for Covered Multifamily Dwellings Under the Fair Housing Act (April 30, 2013), available at: [www.hud.gov/offices/fheo/library/hudjointstatement.pdf](http://www.hud.gov/offices/fheo/library/hudjointstatement.pdf).

<sup>109</sup> See 24 C.F.R. § 8.3.

<sup>110</sup> The UFAS are available at <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/ufas>). See also 24 C.F.R. § 8.32.

<sup>111</sup> See 24 C.F.R. § 8.22.

<sup>112</sup> See HUD regulation at 24 C.F.R. § 8.22(c).

comply with program access and readily achievable barrier removal obligations that exist under Titles II or III of the ADA, must comply with the U.S. Department of Justice's ADA architectural accessibility standards as described in the following U.S. Department of Justice Technical Assistance document ADA Requirements, Effective Date/Compliance Date (Feb. 2011), [http://www.ada.gov/revised\\_effective\\_dates-2010.htm](http://www.ada.gov/revised_effective_dates-2010.htm).

### Accessibility Requirements for Alterations

If a building was constructed for first occupancy after March 13, 1991, the building must be in compliance with, and all alterations must maintain the building's accessible features so that the building continues to meet, the Fair Housing Act's accessibility requirements. In addition, without regard to the date of construction for first occupancy, certain alterations may be required under the Fair Housing Act if requested by a resident as a reasonable accommodation or modification or otherwise required to remediate accessibility deficiencies in the design and construction of the building.

Under HUD's Section 504 regulation, alterations include any structural change in a facility or a change to its permanent fixtures or equipment. If alterations are undertaken to a project that has fifteen or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility, this qualifies as "substantial alterations," in which the new construction provisions of 24 C.F.R. § 8.22 apply.<sup>113</sup>

When alterations are made that do not qualify as substantial alterations, alterations to dwelling units in a multifamily housing project shall, to the maximum extent feasible, be made to be readily accessible to and usable by individuals with disabilities.<sup>114</sup> If alterations of single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, the entire dwelling unit shall be made accessible. Once 5% of the dwelling units in a housing project are readily accessible to and usable by individuals with mobility impairments, no additional elements of dwelling units or entire dwelling units are required to be accessible under this provision. However, alterations to meet ongoing accessibility needs are always required, for example, in response to a reasonable accommodation request. Alterations to common areas or parts of facilities that affect accessibility of existing housing facilities shall, to the maximum extent feasible, be made to be accessible to and usable by individuals with disabilities. For purposes of this paragraph, the phrase "to the maximum extent feasible" shall not be interpreted as requiring that a recipient (including a PHA) make a dwelling unit, common area, facility or element thereof accessible if doing so would impose undue financial and administrative burdens on the operation of the multifamily housing project.<sup>115</sup>

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

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<sup>113</sup> See 24 C.F.R. § 8.23(a). The sole exception is that load bearing structural members are not required to be removed or altered.

<sup>114</sup> HUD may require a higher number or percentage of accessible units pursuant to 24 C.F.R. § 8.22(c) and 24 C.F.R. § 8.23(b)(2).

<sup>115</sup> 24 C.F.R. § 8.23(b).

regulations, unless subject to certain safe harbors identified in the 2010 ADA revised regulations for Titles II and III, as applicable.<sup>116</sup>

HUD will consider on a case-by-case basis a PHA's request to undertake limited new construction on the site of a Covered Project undergoing rehabilitation to comply with accessibility requirements on the site.

#### Additional Accessibility Requirements for Both New Construction and Alterations

Accessible units must be distributed throughout projects and sites and be available in a sufficient range of sizes and amenities so that a qualified individual with disabilities' choice of living arrangements is, as a whole, comparable to that of other persons eligible under the same program.<sup>117</sup> This provision shall not be construed to require provision of an elevator in any multifamily housing project solely for the purpose of permitting location of accessible units above or below the accessible grade.

PHAs are encouraged to use universal design principles, visitability principles and active design guidelines in planning new construction or retrofit work, wherever feasible. However, adherence to universal design principles does not replace compliance with the accessibility requirements of Section 504, the ADA and the Fair Housing Act.

#### Program Accessibility Requirements

Under Section 504, recipients must operate each existing housing program or activity receiving Federal financial assistance so that the program or activity, when viewed in its entirety, is accessible to and usable by individuals with disabilities. Title II of the ADA also includes a program access requirement, while Title III of the ADA requires readily achievable barrier removal.<sup>118</sup> Further, Section 504, the Fair Housing Act, and the ADA require that reasonable accommodations/modifications be granted to address disability-related needs of individuals with disabilities.<sup>119</sup>

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

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

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

<sup>119</sup> For more information on reasonable accommodations, see the HUD/DOJ Joint Statement on Reasonable Accommodations Under the Fair Housing Act at <http://portal.hud.gov/hudportal/documents/huddoc?id=JOINTSTATEMENT.PDF>. While this joint statement focuses on the Fair Housing Act, the principles discussed in the statement generally apply to requests for reasonable accommodation under Section 504, except, for purposes of Section 504, HUD recipients are required to provide and pay for structural modifications as a reasonable accommodation.

## **APPENDIX II: Recommended Relocation Plan Contents**

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While RAD mandates written relocation plans only for projects which involve permanent relocation (including, without limitation, a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than one year, HUD strongly encourages PHAs to document their relocation planning process and procedures in a written relocation plan. The following provides suggested content for required and recommended relocation plans. In the case of any discrepancy between this description of the recommended relocation plan contents and the provisions of the Notice to which this Appendix is attached or any applicable laws or regulations with respect to the URA or Section 104(d), the provisions of the Notice or applicable laws and regulations shall govern.

The basic elements of the relocation plan include:

- A general description of the project and project elements that may create relocation needs;
- Information on residents of the project and eligibility for relocation assistance and payments;
- Information regarding how the project will address the RAD right to return requirements and the project's re-occupancy policies;
- A detailed discussion of plans for temporary relocation assistance;
- A detailed discussion of any transfer of assistance;
- A detailed discussion of any offers of alternative housing options and plans for voluntary permanent relocation assistance;
- A detailed discussion of compliance with fair housing and civil rights requirements, including accessibility requirements;
- The relocation budget; and
- The appeals process.

The plan as a whole should discuss the specific steps to be taken to minimize the adverse impacts of relocation on the residents.

### **I. Project Summary**

The Relocation Plan should provide a general description of the property (e.g., year built, location, number of units, configuration, resident population served). The project summary should also identify the nature of the activities to be undertaken, including acquisition, demolition, rehabilitation, and construction activities and additional detail regarding the project scope (e.g., gut rehab, systems replacement, modest in-unit renovations, transfer of assistance). The project summary should also discuss how any construction activities are to be implemented (i.e., vacate the property entirely, vacate specific floors or buildings, rehabilitation with residents in place). The summary should also discuss the overall theory of relocation, for example, whether a few households will be relocated off-site and the vacant units will be used as temporary housing before other households move back to their original units (a "hoteling" approach), or whether the vacant units will be permanently occupied, with the residents vacating other units to be renovated (a "domino" approach).

The relocation plan should also identify the funding sources which may trigger relocation requirements, with particular attention to the potential presence of HOME or CDBG funds which may trigger Section 104(d) requirements.

## **II. Project Occupancy**

The Relocation Plan should provide information on occupancy of the property including the number of residents, their household type (family, elderly), any non-residential (commercial) occupants, and should identify how any routine needs (such as continuation of utilities such as telephone service) and civil rights compliance issues (for example, limited English proficiency, disabilities, reasonable accommodations and unit modifications that have been or may be necessary) shall be identified and addressed. The Relocation Plan may specify the community meetings, interviews and/or other processes that will be undertaken to assess the residents' needs.

The Relocation Plan should also address eligibility for relocation assistance and payments, applying the rules of the Notice to the particularities of the project.

## **III. Resident Return and Re-occupancy Policies**

The Plan should address how the project will honor the RAD right to return requirements and the “no re-screening upon conversion” policy. With respect to residents who will be temporarily relocated, the Plan should include the methodology that will be used to determine the sequence in which residents will re-occupy units at the project after rehabilitation, demolition, and/or construction is completed, and to determine how residents are matched with units if the residents are not able to return to their original unit. For example, if units will come online in stages, the plan should outline how the PHA or Project Owner will determine when each resident will return to the property.

## **IV. Temporary Relocation Assistance**

The plan should detail the temporary housing resources to be used, the anticipated duration of temporary relocations, notices to be provided and the temporary relocation assistance the PHA or Project Owner will provide for residents (Paragraph 2-7 of HUD Handbook 1378). Topics to be addressed in the Plan include:

- Temporary Housing Resources. The Plan should identify the nature and availability of the temporary housing resources the PHA or Project Owner anticipates using. On-site resources are generally preferred. However, in some cases, PHAs or Project Owners may need to use hotel rooms for short-term relocations, or market-rate apartments. If the PHA or Project Owner anticipates using other assisted housing resources (such as HCVs, public housing or other properties with regulatory restrictions), the PHA or Project Owner should take particular care to address regulatory issues.
- Allocation of Temporary Relocation Resources. The Plan should describe a fair and reasonable methodology for allocating temporary relocation housing to residents on a nondiscriminatory basis.
- Duration of Temporary Relocation. In the event that the Plan includes relocation which is anticipated to exceed one year, it should detail the requirements which apply to those

residents (such as the issuance of a *Notice of Relocation* to the resident covering eligibility for URA relocation assistance, the offer of permanent relocation assistance and payments at URA levels and, if conditions warrant, the subsequent issuance of a *Notice of Eligibility*) as distinct from requirements that apply to residents who are not relocated for more than one year.

- Packing and Moving Assistance. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
  - Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
  - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
  - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
  - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses. The PHA or Project Owner can choose to do one or more of the following:
    - Undertake the moves itself, using employees of the PHA or Project Owner or “force account labor”<sup>120</sup>
    - Use a contractor or moving company
    - Reimburse residents for all actual, reasonable and necessary moving expenses.
- Storage. The Plan should address whether storage of the resident’s personal property is necessary and the arrangements for such storage.
- Damage or Loss. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or the replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
- Out-of-Pocket Expenses. The nature of out of pocket expenses vary based on the nature of the temporary relocation moves. For example, hotel stays or in-place renovation may trigger the need for reimbursement of meals while a kitchen is unavailable. The Plan should outline the anticipated out-of-pocket expenses and the PHA’s or Project Owner’s plans and budget with respect to these expenses.
- Leasing Arrangements. The Plan should address whether the resident will have a direct lease or other contractual relationship with the owner of the temporary relocation resource or whether the PHA or Project Owner will hold the lease and the resident will maintain a contractual relationship with the PHA or Project Owner.
- Utility Costs. The Plan should address whether residents will need to disconnect and reconnect necessary utilities and, if so, how the PHA or Project Owner anticipates managing this process and any associated expenses. Necessary utilities may include telephone, cable service, Internet access or other items. The Plan should address payment of utility deposits, if required at the temporary relocation housing (HUD Handbook 1378, paragraph 2-7(A)(3)).

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<sup>120</sup> Defined at 24 C.F.R. 905.108.

- Reasonable Accommodations. The plan should address whether residents with disabilities will require reasonable accommodations during temporary relocation and, if so, how the PHA or Project Owner anticipates ensuring the provision of reasonable accommodations and any associated expenses. Reasonable accommodations may include, among other items, the provision of transportation assistance, relocation to locations which are physically accessible and located near public transportation, and modifications to policies to allow individuals with disabilities to reside with a live-in aide.

## **V. Transfer of Assistance**

Relocation planning in the context of transfer of assistance is particularly complex. The PHA should address how RAD, URA and Section 104(d) requirements each apply, as the same activity may be treated differently under each regulatory framework. The Plan should specifically outline the PHA's procedures to ensure that the applicable requirements are applied to each situation appropriately. The Plan should also address whether relocation is required for any businesses or residents at the destination site. Finally, the Plan should address whether two moves – from the public housing site to an intermediate site and then to the transfer of assistance site – are necessary while the Covered Project is being constructed or rehabilitated.

## **VI. Alternative Housing Options and Voluntary Permanent Relocation Assistance**

If the PHA or Project Owner seeks to offer alternative housing options, the Plan should identify those options and the manner in which they are presented to residents for decision. The plan should also outline the counseling the PHA or Project Owner will provide to assist the residents in determining what options may be available and the financial implications of those options, for example,

1. Discussion of whether units available in the market (either in the affordable market or the unrestricted market) will meet the financial and dwelling requirements of relocated residents;
2. The general area or location of unit(s);
3. Where applicable, the accessibility of such units for individuals with disabilities;
4. Criteria for receiving relocation assistance; and
5. Any other information that might benefit residents in their consideration of housing choices.

The Plan should identify how the PHA or Project Owner will work with any residents who have elected voluntary permanent relocation. The Plan should further include a description of the permanent relocation assistance the PHA or Project Owner will provide to such residents. Topics to be addressed in the Plan include:

- Replacement Housing. The Plan should address the availability of comparable replacement housing, the notices to be provided and the provisions to ensure that appropriate accessibility features are available in compliance with applicable laws and regulations.

- Fair housing considerations. The Plan should address referrals to housing not located in areas of minority concentration and compliance with requirements regarding accessible housing for persons with disabilities. The Plan should address how the PHA or Project Owner will determine if residents have paid for the acquisition and/or installation of accessible features in the housing from which they are being relocated and how the PHA or Project Owner will ensure that the replacement housing contains required and comparable accessible features or that the resident is appropriately compensated for the cost of acquiring and/or installing required and comparable accessible features.
- Packing and Moving Assistance. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
  - Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
  - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
  - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
  - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses consistent with 49 C.F.R. § 24.301 or, at the resident's option, 49 C.F.R. § 24.302.
- Storage. The Plan should address whether storage of the resident's personal property is necessary and the arrangements for such storage. See 49 C.F.R. § 24.301(g)(4).
- Damage or Loss. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or the replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
- Dislocation Allowance. The Plan should address when the resident is entitled to a dislocation allowance and the amount of such dislocation allowance, consistent with the URA Fixed Residential Moving Cost Schedule available at: [www.fhwa.dot.gov/real\\_estate/uniform\\_act/relocation/moving\\_cost\\_schedule.cfm](http://www.fhwa.dot.gov/real_estate/uniform_act/relocation/moving_cost_schedule.cfm).
- Appliances. The Plan should address disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property.
- Security Deposits and Utility Costs. The Plan should address how the PHA or Project Owner anticipates managing transfer of utility arrangements, security deposits and any associated expenses. Utilities may include telephone, cable service, Internet access or other items that may have been in place in the resident's original home. See 49 C.F.R. § 24.301(h)(12).
- Replacement Housing Payment. The Plan should address the circumstances in which displaced residents may be entitled to a replacement housing payment (RHP) to cover the



increase, if any, in monthly housing costs for a 42-month period pursuant to URA requirements or a 60-month period pursuant to Section 104(d).<sup>121</sup>

## VII. Relocation Budget

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

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

For temporary relocation moves:

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

For permanent moves:

- Number and cost of one-time moves into another unit in the same building/complex.
- Number and cost of one permanent move to a unit not within the same building/complex
- Any required dislocation allowance

- 4) The estimated cost of projected increases in monthly housing costs and other expenses for temporary relocation (if applicable).
- 5) The estimated cost of projected replacement housing payments (RHP) (42-month period for URA or 60-month period if Section 104(d) applies).
- 6) Contingency costs estimated for carrying out the relocation process necessary to complete the proposed project.

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<sup>121</sup> See also, CPD Notice 2014-09 "Effective Date of Moving Ahead for Progress in the 21<sup>st</sup> Century Act (MAP-21) Changes to Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) Payment Limits and Replacement Housing Payment Eligibility Criteria."

## **VIII. Written and Oral Communications with Individuals with Disabilities and LEP Persons and Use of Accessible Meeting Locations**

The Plan should identify how the PHA or Project Owner will take appropriate steps to ensure effective communication with residents and other individuals with disabilities involved in the relocation, such as through the provision of sign language and other interpreters and large print, Braille, accessible electronic, and other alternate format written communications. The Plan should identify the measures to be taken to ensure the most integrated meeting settings appropriate to individuals with disabilities. The Plan should identify how the PHA or Project Owner will ensure meaningful access for LEP persons, such as through written materials and oral communications provided in languages other than English.

## **IX. Appeal Process**

The Plan should specify the procedures to be followed if a resident disagrees with the PHA's or Project Owner's decision as to the resident's eligibility to receive relocation assistance, the amount of a relocation payment, or the adequacy of a comparable replacement dwelling offered to a resident. These procedures should include the process for filing a written appeal to the displacing agency and the specific appeal procedures to be followed consistent with 49 C.F.R. 24.10 (and 24 C.F.R. § 42.390 if Section 104(d) is involved).

## **X. Certification**

The Plan should contain a certification of compliance with this Notice (or H 2014-09/PIH 2014-17, if applicable), the URA, fair housing and civil rights requirements and, if applicable, Section 104(d).

## **Technical Assistance**

For detailed technical assistance regarding the contents or provisions of a written relocation plan, the PHA or Project Owner should direct questions to their RAD Transaction Manager or email [rad@hud.gov](mailto:rad@hud.gov).