

PUBLIC HOUSING AGENCY (PHA) PLAN

**Annual Agency Plan for
Fiscal Year 2021-2022**



Table of Contents

Annual PHA Plan	4
PHA Information	4
Annual Plan Elements	5
Statement of Capital Improvements	6
B.1 – Revision of PHA Plan Elements	7
Housing Needs of Families on the Public Housing (Elderly) Waiting Lists as of July 24, 2020	9
Housing Needs of Families on the Housing Choice Voucher (HCVP) Waiting List as of July 24, 2020	11
Strategy for Addressing Housing Needs (Analysis of Impediments to Fair Housing Choice)	17
Reasons for Selecting Strategies	19
B1: Revision of PHA Plan Elements: ACOP	20
Financial Resources:	22
Planned Sources and Uses	23
B.2 – New Activities	29
Designated Housing for Elderly and/or Disabled Families	38
Conversion of Public Housing to Tenant-Based Assistance	38
Conversion of Public Housing to Project-Based Assistance under RAD	39
Non- Smoking Policies	73
Project-Based Vouchers	74
Other Capital Grant Programs	74
B.3 Civil Rights Certification	75
B.5 – Progress Report	75
B.6 Resident Advisory Board (RAB) Comments	85
B.7 Certification by State and Local Officials	86
C.1 Capital Improvements	86

DRAFT



Richmond Redevelopment and Housing Authority
(RRHA)
Annual Agency Plan
Fiscal Year 2021 - 2022

Annual PHA Plan (Standard PHAs and Troubled PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
--	---	--

A.	PHA Information																										
A.1	<p>PHA Name: <u>RICHMOND REDEVELOPMENT AND HOUSING AUTHORITY</u> PHA Code: <u>VA007</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2021</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>3,723</u> Number of Housing Choice Vouchers (HCVs) <u>3,672</u> Total Combined Units/Vouchers <u>7,395</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>PHA Plan, PHA Plan Elements, and Public Hearing Information can be found at the following locations:</p> <ol style="list-style-type: none"> 1. Housing Authority Administrative Office, 901 Chamberlayne Parkway, Richmond, VA 23220 2. Housing Authority Administrative Office, 918 Chamberlayne Parkway, Richmond, VA 23220 3. Calhoun Center, 436 Calhoun Street, Richmond, VA 23220 4. Housing Authority Property Management Offices at Gilpin Court, Whitcomb Court, Creighton Court, Fairfield Court, Mosby Court, Hillside Court, and all RRHA Senior Property Management Offices 5. Housing Authority Website: http://www.rrha.com 6. Resident Advisory Boards Members receive an electronic or hard copy of the draft Annual Plan <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1"> <thead> <tr> <th rowspan="2">Participating PHAs</th><th rowspan="2">PHA Code</th><th rowspan="2">Program(s) in the Consortia</th><th rowspan="2">Program(s) not in the Consortia</th><th colspan="2">No. of Units in Each Program</th></tr> <tr> <th>PH</th><th>HCV</th></tr> </thead> <tbody> <tr> <td>Lead PHA:</td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
Participating PHAs	PHA Code					Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program																			
		PH	HCV																								
Lead PHA:																											

B.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

B.4	<p>Most Recent Fiscal Year Audit.</p> <p>Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: During the 2019 audit it was noted that the Authority overcharged the LIPH program for central maintenance cost in 4 of 25 transactions selected. There were questioned costs of \$118.00.</p>
B.5	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>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>
B.7	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
B.8	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: RRHA currently has an approved Corrective Action Plan (CAP) outlining the corrective action plans that it will initiate to address unit condition deficiencies identified during the REAC Quality Control Physical Assessment Subsystem (PASS) inspections.</p>
C.	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
C.1	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD Form - 50075.2 approved by HUD on <u>11/06/2020</u> (see attached)</p>

B.1 – Revision of PHA Plan Elements

Statement of Housing Needs and Strategy for Addressing Housing Needs

The Richmond Redevelopment and Housing Authority (RRHA) identifies the housing needs of the low-income, very-low income and extremely low-income families. These families must reside in the jurisdiction served by RRHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Housing Choice Voucher Program tenant-based assistance waiting lists.

The housing needs for RRHA as listed in the charts below covers the income levels, racial distribution and bedrooms needed. Based on the area median income (AMI) for these income brackets, there remains a need for housing throughout the area.

RRHA's strategy to address the housing needs of these individuals/families include:

Maximizing the number of affordable units available:

- 1) Employ effective management practices and policies to minimize off-line public housing units with an occupancy goal of 98%;
- 2) Maintain at least 92% lease-up rate or 100% budget authority for the Housing Choice Voucher Program by establishing effective payment standards, occupancy standards, and manageable practices;
- 3) Undertake measures to ensure access to affordable housing among families within RRHA Public Housing Developments and waiting list applicants.

Increasing the number of affordable housing units by applying for additional voucher subsidy and special programs available through Notice of Funding Availability.

Increase the awareness of RRHA resources by providing marketing information to local social service agencies, advocacy groups, partners, residents and applicants; advertise in available publications, RRHA website and radio campaigns.

Conduct activities to affirmatively further fair housing:

- a. Further encourage a positive partnership with H.O.M.E to encourage and counsel HCVP participants to locate units outside of areas of poverty or minority concentration.
- b. RRHA has engaged in a Regional Analysis of Impediments to Fair Housing Choice, with other nearby jurisdictions to guide future practices and eliminate housing barriers for low, very low, and moderate-income households. This research analyzed barriers, impediments, and/or discriminatory practices that may hinder a person's right to Fair Housing Choice. The following action steps were recommended by Root Policy Research and will be implemented by RRHA:

1. Fair Housing Education and Outreach programs for public housing residents, HCVP participants and landlords;
2. Improving the environment of persons with disabilities in public housing (increasing the number of handicapped accessible units) HCVP and PBV programs;
3. Continue to offer programs that build self-sufficiency and job readiness among residents; including employment and training opportunities through the Section 3 Program;
4. Adopt best practices for crime-reduction, economic self-sufficiency, and good tenant programs;
5. Strengthen client resources for relocating to high opportunity areas;
6. Provide comprehensive tenant transitional programs for redeveloped public housing and
7. Support state and federal regulatory reform to address rental housing disparities.

The strategies that RRHA pursue will be influenced by funding, staffing availability, housing needs, and consultation with residents, the Resident Advisory Board, and advocacy groups.

Housing Needs of Families on the Public Housing Waiting Lists as of May 11, 2021

Total Families on the Waiting List = 11,863 # of families % of total families,		
Income Levels		
Extremely low income (<= 30 % AMI or federal poverty level)	9,778	82.4%
Very low income (>30% but <=50% AMI)	1,683	14.2%
Low income (>50% but <80% AMI)	361	3.0%
Families with children	4,322	36.4%
Elderly families	644	5.4%
Families with Disabilities	2,465	20.8%
Racial Distribution		
Race/ethnicity (White)	1,694	14.3%
Race/ethnicity (Black)	10,438	88.0%
Race/ethnicity (Asian/Pacific Islander/Other)	687	5.8%
Race/ethnicity (Hispanic)	540	4.6%
Bedrooms Needed		
1 BR	7,034	59.3%
2 BR	3,225	27.2%
3 BR	1,243	10.5%
4 BR	317	2.7%
5 BR	44	0.4%

Is the waiting list closed (select one)? ☐ YES ☒ NO If YES:

How long has it been closed (# of months)?

Does the PHA plan to reopen the list in the PHA plan year? ☐ YES ☐ NO N/A

Does the PHA permit specific categories of families onto the waiting lists, even if generally closed? ☐ YES ☒ NO

Housing Needs (cont'd)

Housing Needs of Families on the Public Housing (Elderly) Waiting Lists as of May 11, 2021

Total Families on the Waiting List = 1,409	# of families	% of total families
Income Levels		
Extremely low income ($\leq 30\%$ AMI or federal poverty level)	1,236	87.7%
Very low income ($>30\%$ but $\leq 50\%$ AMI)	140	9.9%
Low income ($>50\%$ but $<80\%$ AMI)	31	2.2%
Families with children	70	5.0%
Elderly families	842	59.8%
Families with Disabilities	712	50.5%
Racial Distribution		
Race/ethnicity (White)	212	15.1%
Race/ethnicity (Black)	1,186	84.2%
Race/ethnicity (Asian/Pacific Islander/Other)	68	4.8%
Race/ethnicity (Hispanic)	63	4.5%
Bedrooms Needed		
1 BR	1,263	89.6%
2 BR	0	0.0%
3 BR	0	0.0%
4 BR	0	0.0%
5 BR	0	0.0%

Is the waiting list closed (select one)? ☐ YES ☒ NO If YES:

How long has it been closed (# of months)?

Does the PHA plan to reopen the list in the PHA plan year? ☐ YES ☐ NO n/a

Does the PHA permit specific categories of families onto the waiting lists, even if generally closed? ☐ YES ☒ NO

Housing Needs (cont'd)

Housing Needs of Families on the Housing Choice Voucher (HCV) Waiting List as of May 11, 2021

Total Families on the Waiting List = 4,999	# of families	% of total families
Income Levels		
Extremely low income ($\leq 30\%$ AMI or federal poverty level)	0	0.0%
Very low income ($>30\%$ but $\leq 50\%$ AMI)	0	0.0%
Low income ($>50\%$ but $<80\%$ AMI)	0	0.0%
Families with children	2,466	49.3%
Elderly families	332	6.6%
Families with Disabilities	889	17.8%
Racial Distribution		
Race/ethnicity (White)	357	7.1%
Race/ethnicity (Black)	4,721	94.4%
Race/ethnicity (Asian/Pacific Islander/Other)	174	3.5%
Race/ethnicity (Hispanic)	178	3.6%
Bedrooms Needed		
1 BR	0	0.0%
2 BR	0	0.0%
3 BR	0	0.0%
4 BR	0	0.0%
5 BR	0	0.0%

Is the waiting list closed (select one)? ☒ YES ☐ NO If YES:

How long has it been closed (# of months)? 7 months

Does the PHA plan to reopen the list in the PHA plan year? ☐ YES ☒ NO

Does the PHA permit specific categories of families onto the waiting lists, even if generally closed? ☐ YES ☒ NO

Housing Needs Assessment Demographics

The following is drawn from the Richmond 5 – Year Consolidated Action Plan FY 2016-2020 and FY 2017- 2018 Annual Action Plan by the City of Richmond and the 2010-2014 American Community Survey (ACS).

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

There are 19,550 households for 0-30% MFI in the City of Richmond. Among these households, 460 rental households are in substandard housing condition and 50 homeowner households are in substandard condition.

There are 11,910 for 30%-50% MFI in the City of Richmond. Among these households, 190 rental households are in substandard condition and 15 homeowner households are in substandard condition.

There are 15,295 households for 50%-80% MFI in the City of Richmond. Among them, 280 rental households are in substandard condition and 30 homeowner households are in substandard condition.

Table 6 - Housing Needs Assessment Demographics

Comprehensive Housing Affordability Strategy (CHAS) data
Data for: Virginia
Year Selected: 2012-2016 ACS

Income Distribution Overview	Owner	Renter	Total	
Household Income less-than or= 30% HAMFI	129,615	236,710	366,325	
Household Income >30% to less-than or= 50% HAMFI	161,170	177,340	338,510	
Household Income >50% to less-than or= 80% HAMFI	247,925	187,930	435,855	
Household Income >80% to less-than or=100% HAMFI	195,540	115,985	311,525	
Household Income >100% HAMFI	1,298,510	339,450	1,637,960	
Total	2,032,760	1,057,415	3,090,180	
Housing Problems Overview 1	Owner	Renter	Total	
Household has at least 1 of 4 Housing Problems	468,435	494,030	962,465	
Household has none of 4 Housing Problems	1,551,405	542,230	2,093,635	
Cost burden not available, no other problems	12,920	21,155	34,075	
Total	2,032,760	1,057,415	3,090,180	
Severe Housing Problems Overview 2	Owner	Renter	Total	
Household has at least 1 of 4 Severe Housing Problems	190,725	270,605	461,330	
Household has none of 4 Severe Housing Problems	1,829,115	765,660	2,594,775	
Cost burden not available, no other problems	12,920	21,155	34,075	
Total	2,032,760	1,057,415	3,090,180	
Housing Cost Burden Overview 3	Owner	Renter	Total	
Cost Burden less-than or= 30%	1,569,930	570,040	2,139,970	



Cost Burden >30% to less-than or= 50%	281,385	236,465	517,850	
Cost Burden >50%	168,255	228,355	396,610	
Cost Burden not available	13,185	22,555	35,740	
Total	2,032,760	1,057,415	3,090,180	
Income by Housing Problems (Owners and Renters)	Household has at least 1 of 4	Household has none of	Cost Burden not available,	Total
	Housing Problems	4 Housing Problems	no other housing problem	
Household Income less-than or= 30% HAMFI	279,645	52,615	34,075	366,325
Household Income >30% to less-than or= 50% HAMFI	235,635	102,875		338,510
Household Income >50% to less-than or= 80% HAMFI	204,615	231,240		435,855
Household Income >80% to less-than or= 100% HAMFI	93,995	217,530		311,525
Household Income >100% HAMFI	148,585	1,489,375		1,637,960
Total	962,465	2,093,635	34,075	3,090,180
Income by Housing Problems (Renters only)	Household has at least 1 of 4	Household has none of	Cost Burden not available,	Total
	Housing Problems	4 Housing Problems	no other housing problem	
Household Income less-than or= 30% HAMFI	182,580	32,980	21,155	236,710
Household Income >30% to less-than or= 50% HAMFI	145,555	31,785		177,340
Household Income >50% to less-than or= 80% HAMFI	101,275	86,655		187,930



Household Income >80% to less-than or= 100% HAMFI	33,615	82,370		115,985
Household Income >100% HAMFI	31,005	308,445		339,450
Total	494,030	542,230	21,155	1,057,415
Income by Housing Problems (Owners only)	Household has at least 1 of 4	Household has none of	Cost Burden not available,	Total
	Housing Problems	4 Housing Problems	no other housing problem	
Household Income less-than or= 30% HAMFI	97,065	19,635	12,920	129,615
Household Income >30% to less-than or= 50% HAMFI	90,080	71,090		161,170
Household Income >50% to less-than or= 80% HAMFI	103,340	144,585		247,925
Household Income >80% to less-than or= 100% HAMFI	60,380	135,160		195,540
Household Income >100% HAMFI	117,580	1,180,930		1,298,510
Total	468,435	1,551,405	12,920	2,032,760
Income by Cost Burden (Owners and Renters)	Cost burden > 30%	Cost burden > 50%	Total	
Household Income less-than or= 30% HAMFI	274,980	226,500	366,330	
Household Income >30% to less-than or= 50% HAMFI	229,575	107,110	338,510	
Household Income >50% to less-than or= 80% HAMFI	194,520	39,960	435,855	
Household Income >80% to less-than or= 100% HAMFI	86,790	11,110	311,525	
Household Income >100% HAMFI	128,590	11,930	1,637,960	



Total	914,455	396,610	3,090,180	
Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden >50%	Total	
Household Income less-than or= 30% HAMFI	179,220	153,770	236,710	
Household Income >30% to less-than or= 50% HAMFI	141,370	60,375	177,340	
Household Income >50% to less-than or= 80% HAMFI	94,435	10,745	187,930	
Household Income >80% to less-than or= 100% HAMFI	29,095	1,965	115,985	
Household Income >100% HAMFI	20,700	1,500	339,450	
Total	464,820	228,355	1,057,415	
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total	
Household Income less-than or= 30% HAMFI	95,760	72,730	129,615	
Household Income >30% to less-than or= 50% HAMFI	88,205	46,735	161,170	
Household Income >50% to less-than or= 80% HAMFI	100,085	29,215	247,925	
Household Income >80% to less-than or= 100% HAMFI	57,690	9,140	195,540	
Household Income >100% HAMFI	107,900	10,435	1,298,510	
Total	449,640	168,255	2,032,760	

1. The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.
2. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.
3. Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

Strategy for Addressing Housing Needs (Analysis of Impediments to Fair Housing Choice)

RRHA reviewed the City of Richmond's Analysis of Fair Housing Choice (Update) 2021-2025 (hereafter, the "City Analysis"). RRHA's review of the City Analysis revealed five core impediments to fair housing choice within the City of Richmond which implicate RRHA's jurisdiction, mandate, and operations (City Analysis at p. 4), to wit:

- (1) The economic and social isolation of many inner-city neighborhoods, which restricts housing choice for a significant number of low-income, disabled, elderly, and minority residents.
- (2) The lack of accessible housing affordable to families and individuals earning 50% or less of the area median income.
- (3) Private market practices in leasing and lending which disadvantage minorities, people with disabilities, and families with children.
- (4) The lawfulness of source-of-income discrimination in the rental housing market.

RRHA plans to address each of these impediments according to the following strategies and goals.

IMPEDIMENT (1): Restricted housing choice for low-income, disabled, elderly, and minority residents.

- **STRATEGY 1: Affirmatively further fair housing for low-income and minority residents in areas of poverty or minority concentration.**
 - Counsel HCVP participants as to the location of units outside areas of poverty or minority concentration and assist them to locate those units. (RRHA utilizes an MOU with a non-profit partner, Housing Opportunities Made Equal, to assist HCVP participants in these endeavors.
 - Market the HCV program to landlords outside of areas of poverty or minority concentration.
 - Prioritize the development of new RAD, PBV, affordable housing, mixed finance communities outside of areas of minority or poverty concentration.
 - As to RRHA's HCV program as well as newly constructed RAD, PBV, or mixed-finance units, market housing availability to residents in areas of poverty or minority concentration including:
 - Informational spots to local media outlets, such as radio, cable TV, newspapers, and periodicals.
 - Special outreach to minority families, families with disabilities, and very low-income families.
 - Post notices of housing availability in places of employment, unemployment offices, welfare offices, post offices, grocery stores, churches, community halls, public transportation centers, and with other agency community service providers.
 - Conduct outreach to organizations that assist people with disabilities, the elderly, students, immigrants, the homeless, and victims of domestic violence.
- **STRATEGY 2: Increase access to accessible housing for the elderly and persons with disabilities.**
 - Construct new disabled-accessible units in RRHA's RAD projects and mixed-finance development efforts.
 - Provide higher payment standards for HCVP families needing ADA or other disabled-accessible units.
 - Apply for special-purpose Housing Choice vouchers, such as Mainstream and VASH vouchers, which are targeted to elderly and disabled families.
 - Affirmatively market RRHA partnerships with non-profit agencies that assist elderly and disabled families with the installation of ramps and other accessible features.

IMPEDIMENT (2): Lack of housing affordable to families earning 50% AMI.

- **STRATEGY 1: Maximize and improve the number of deeply affordable units currently available within RRHA's housing stock.**
 - Carry out needed modifications in public housing based on the Green Physical Needs Assessment (GPNA) for public housing.
 - Continue planning for the utilization of RAD and the Section 18 "demolition/disposition" procedure to rehabilitate or redevelop existing public housing properties.
- **STRATEGY 2: Increase the number of affordable housing units within the City.**
 - Apply for new Housing Choice vouchers, as they become available.
 - Continue to leverage new sources of private or public funds to create additional housing.
 - Increase HCVP lease-up rates by increasing payment standards and marketing the HCV program to new owners in areas of higher opportunity.
 - Participate in the City's Consolidated Plan process to ensure coordination with broader community strategies.
 - Seek additional federal grant funds and state Capital Improvement Project funding.
 - Pursue new housing resources other than public housing or HCVP assistance.
- **STRATEGY 3: Affirmatively target available RRHA assistance to families between 50-30% AMI.**
 - Utilize admissions preferences aimed at families with members in the workforce.
 - Adopt program policies which support and encourage employment.
 - Continue to partner with local and regional workforce partners to increase the number of employed and underemployed persons in assisted housing. (Specifically, partner with the City of Richmond's Department of Community Wealth Building and other future partnerships.
 - Provide programs, tools, and resources for job skills development, job training, and employment opportunities for public housing residents through resident programs and services, Section 3, scholarship opportunities, and other resources available through our Resident Services Department.
- **STRATEGY 4: Affirmatively target available RRHA assistance to families below 30% AMI.**
 - Exceed HUD targeting requirements for families at or below 30% AMI in public housing.
 - Exceed HUD targeting requirements for families at or below 30% AMI in the HCV program.
 - Adopt policies that support and encourage employment (primarily through our Resident Services Department and the City of Richmond's Department of Community Wealth Building).

IMPEDIMENT (3): Leasing and lending practices which disadvantage minorities, the disabled, and families with children.

- **STRATEGY 1: Improve internal RRHA fair housing practices.**
 - Accommodate requests for reasonable accommodation based on disabilities in the marketing, pre-application, application, and continued service functions of RRHA's housing programs.
 - Procure language services for families of limited English proficiency, including the translation of vital documents into target languages.
 - Continue to require all RRHA staff to attend regular training on fair housing laws.

IMPEDIMENT (4): Source-of-income discrimination.

- Where appropriate and lawful, continue to advocate for legislative changes which would protect program participants from source-of-income discrimination.

Reasons for Selecting Strategies

- Funding constraints
- Staffing constraints
- Limited availability of sites for assisted housing
- Evidence of housing needs as demonstrated in the 2016- 2020 City of Richmond Consolidated Plan, 2018-2019 Annual Action 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 (RAB).
- Results of consultation with advocacy groups.

B1: Revision of PHA Plan Elements: ACOP

Please see below a summary of FY2021-2022 ACOP Revisions .

A redlined copy of the ACOP which indicates the actual text of all proposed revisions is also attached for convenience.

- **Chapter 2 – Fair Housing Policy:** Added gender identity, sexual orientation and veteran status to protected classes in each place the classes are listed.
- **Chapter 4(C) – Accessibility of the application process:** Added language describing efforts RRHA will take to make the online application process more accessible to applicants without Internet access or proficiency with technology (kiosks, etc.). Also provided that for any email to applicants/participants that is returned undeliverable, RRHA will attempt a paper mailing at the last known address.
- **Chapter 5 – Criminal Background Eligibility Criteria**
General Revision: Denial of assistance and re-apply dates now defined by recency of conviction as well as charge class, allowing staff to differentiate between crimes of differing severity within a category.
Drug policies: Possession of marijuana, and distribution of less than one ounce of marijuana, are no longer considered a crimes.
Alcohol policies: Penalties greatly reduced for alcohol-related convictions (DWI, drunk in public).
Rehabilitation: Burden to prove applicant has been “rehabilitated” from prior convictions will be lowered, allowing more applicants to claim rehabilitation.
- **Chapter 5(C)(2) – Description, Ranking of Waiting List Preferences:** Added language providing that the points awarded for each waitlist preference apply to all applicants claiming the preference, even if they applied when a different ACOP with different preference points was in

effect. Also added language to the VAWA preference clarifying what an applicant's verification documents need to demonstrate to show eligibility.

- **Chapter 8(A) – General Leasing Policies:** Removed the provision forbidding residents from allowing visitors who were previously evicted from public housing.
- **Chapter 12(D)(2) – Changes in Family and Household Composition:** Added language clarifying what verification documents are needed to remove a minor child from a household due to a change in custody.
- **Chapter 13(B) – Move-In Inspection:** Removed language providing that RRHA may conduct a move-in inspection for new residents when the current family still occupies a unit.
- **Chapter 15 (D)(4B) – Emergency Transfers:** Based on the threat assessment, a law enforcement agency or RRHA Director of Public Safety may recommend rehousing.
- **Chapter 23(VI)(F) – Scope of Hearing, Burden of Proof:** Added language clarifying that a resident may not raise a new *grievance* at a formal hearing without first raising that grievance at an informal hearing, but that they still may raise new facts/arguments/evidence even if it was not raised at an informal hearing.
- **Exhibit #4 – List of Standard Charges:** Removed language about charges for preventive/routine maintenance and added language stating that we may only charge residents for damage caused by the resident which is beyond normal wear-and-tear.

B1: Revision of Plan Elements: Administrative Plan

The described revisions to RRHA's HCVP Administrative Plan for FY2021-2022 reflect changes to RRHA's Plan Elements related to the following categories enumerated under Item B1: "Operations and Management." A summary of proposed changes for the FY2021-2022 Administrative Plan follows. A redlined copy of the Administrative Plan which indicates the actual text of all proposed revisions is also attached for convenience.

Revisions are summarized as follows:

Whole document. RRHA's inspection standards have been changed from UPCS-V to NSPIRE. All references to UPSC-V changed to NSPIRE and all regulatory citations updated where needed. Language added stating that any stray references to HQS or UPCS-V be construed to refer to NSPIRE.

- **Chapter 3: Denial of Assistance - Criminal Activity (Revised)**
Generally: Denial of assistance and re-apply dates now defined by recency of conviction as well as charge class, allowing staff to differentiate between crimes of differing severity within a category.
Drug policies: Possession of marijuana, and distribution of less than one ounce of marijuana, are no longer considered a crimes.
Alcohol policies: Penalties greatly reduced for alcohol-related convictions (DWI, drunk in public).
Rehabilitation: Burden to prove applicant has been "rehabilitated" from prior convictions will be lowered, allowing more applicants to claim rehabilitation.

- **8-I.B. (“Additional Local Requirements”), p. 8-4.** Corrected language implying that units must be outfitted with air conditioning capable of cooling a unit to 65 degrees during the summer.
- **8-II.A. (“Notice and Scheduling”), p. 8-12.** Added language clarifying that NSPIRE inspections can be scheduled by email, USPS, or the resident portal.
- **Exhibit 12-1 (“Statement of Family Obligations”), p. 12-28.** Added a new family obligation forbidding the family from allowing non-family members to use the address for mail or other official purposes. Also added language clarifying that a family does not fail this obligation if they did not know, or didn’t have reason to know, the address was being used by the individual.

The following policies are also contained within RRHA’s ACOP/Admin Plan and available at RRHA’s Administrative Offices and/or Management Offices and website at www.rrha.com:

1. Eligibility, Selection and Admissions and Wait List Policies
2. Deconcentration Policy
3. Rent Determination Policy
4. Operation and Management
5. Grievance Procedure
6. Homeownership Programs
7. Community Service and Self- Sufficiency Program
8. Pet Policy

FINANCIAL RESOURCES

This section lists the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year.

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants		
a) Public Housing Operating Fund	20,472,403	
b) Public Housing Capital Fund	8,153,877	
c) Capital Fund Recovery Grant	-0-	
d) HOPE VI Revitalization	-0-	
e) HOPE VI Demolition	-0-	
f) Annual Contributions for Section 8 Tenant-Based Assistance	26,302,874	
g) Family Self-Sufficiency Grant	72,000	
h) Resident Opportunity and Supportive Services Grant	217,500	
Other Federal Grants (list below)	-0-	
2. Prior Year Federal Grants (unobligated funds only) (list below)		
CFP 2018 as of 02/28/2021	20,581	In accordance with application
CFP 2019 as of 02/28/2021	5,823,691	In accordance with application
CFP 2020 as of 02/28/2021	10,528,639	In accordance with application
CFP 2021 as of 2/28/21	12,050,634	In accordance with application
3. Public Housing Dwelling Rental Income	8,122,199	Operations of PHA sites
4. Other income (list below)		
Leases	3,980	LIPH Operations
Estimated HUD Held Cash Reserves for 2021	1,237,906	HCVP HAP

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
5. Non-federal sources (list below) Interest – 164,090 Sale of Property – 1,283,653 Bond Fees – 234,968 Developer Fees – 484,622	2,167,333	Agency wide use RECD Operations and LIPH Dispositions RECD Operations RECD Operations
Total resources	95,173,617	
Note: Sources primarily based on the 2021 Budget.		

HOMEOWNERSHIP

This section describes any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.

HOPE VI:

7. Blackwell, Swansboro, Fulton, Citywide Homeownership Project Number – **VA36URD007I197**
 - Approved 3/29/2002, unit count 212
 - RRHA may amend its HOPE VI Revitalization Plan (RP) for Blackwell for vacant lots that still exist in our inventory today. The RP would propose continuation of building affordable and market rate homeownership units, under the same HOPE VI restrictions RRHA had placed on the previous HOPE VI lots.

8. Section 32 Applications approved to date are as follows:

- Neighborhood Homeownership Initiative (NHI) Project Number DDA0002335: Approved 9/25/2007, Unit count - 121 Units.

RRHA proposed and received approval for a significant amendment to the annual plan which identifies changes to its Section 32 Homeownership Plan, NHI – Project Number DDA0002335.

RRHA received authorization from HUD on November 19, 2015 to rescind sixty-six (66) units of the Section 32 Homeownership plan and received approval to dispose of these units April 28, 2017. RRHA contracted with two not-for-profit developers to rehabilitate, market and sell thirty-eight (38) units to families earning eighty percent (80%) or less of the area median income. Remaining twenty-eight (28) units were sold via public auction.

RRHA has received authorization from HUD on June 8, 2017, to rescind forty-four (44) units of the Section 32 Homeownership plan and received approval to dispose of these units October 11, 2018. RRHA contracted with two not-for-profit developers to rehabilitate, market and sell thirty-six (36) houses to families earning eighty percent (80%) or less of the area median income. The remaining eight (8) units were sold via public auction.

9. Greenwalk – Project Number DDA0003958: Approved 11/10/2010, unit count 20

10. **5(h) Applications** approved to date are as follows:

VA 7-30 Approved 7/26/1999

- RRHA proposes the disposition of 3208 N Street

SAFETY AND CRIME PREVENTION

The Department of Public Safety (DPS) was created in July of 2019 to ultimately improve public safety, a key component in creating a respectable quality of life for RRHA residents in support of RRHA's mission. The current focus is reducing violent crime through comprehensive strategies leveraging RRHA resources with other like-minded entities such as, but not limited to, the Richmond Police Department (RPD), Richmond Commonwealth Attorney's Office (RCAO), Virginia Department of Criminal Justice Services (DCJS), Virginia Attorney General's Office (VAGO), Richmond Public Schools (RPS), United States Attorney's Office (USAO), Virginia Department of Health (VDH), Virginia Commonwealth University (VCU), Richmond City Department of Health (RDH), Virginia Commonwealth University (VCU), VCU Health, Virginia Union University (VUU), the Faith Based Community, Non-Profit Organizations, and other Federal, State, and local agencies.

The current vision is to primarily incorporate RRHA's Resident Services, Public Safety, and Property Management to address violent crime through prevention and intervention strategies. This will include strengthening, collaborating, and integrating established and developed partnerships into, proactive strategies. Acknowledging partners may be institutionally focused on other missions, such as, but not limited to, enforcement; education; or community health, RRHA will create strategies and partnerships to leverage and compliment those efforts by identifying commonalities in our missions and strategies to address violent crimes.

The RRHA Prevention/Intervention Steering Committee which is comprised of the aforementioned entities, and recently includes representation from RRHA's own residents, plays a significant role in identifying and acquiring appropriate services and monitoring and evaluating applied services. The steering committee is currently chaired by the RRHA Director of Public Safety and comprised of representatives from: RPD, RCAO, DCJS, VAGO, RPS, USAO, VDH, VCU, VUU, and RDH. The steering committee addresses violence and quality of life issues primarily through prevention and intervention strategies while being mindful of other ongoing strategies, such as enforcement, being implemented within the memberships' individual purview. The executive steering committee commits to a problem-solving process, whereby the board routinely and systematically identifies and analyzes problems and develops fluid solutions, capitalizing on the unique expertise, assets, and cutting-edge technologies of each agency and its partners.

In addition to utilizing data and research from the steering committee members, such as crime and truancy statistics, RRHA routinely surveys its employees and residents on general health and welfare issues related to public safety. RRHA will seek to develop and implement strategies that will utilize available resources and continue to stress the importance of resident involvement in crime prevention. The DPS engages the residents informally while walking in the communities to discuss issues and potential solutions. More formally, the PSD attends Resident Council and Richmond Tenant Organization meetings to listen to concerns from the resident leadership and collaborate on solutions.

In its brief existence, the PSD has become very proactive in identifying resident's needs as they relate to violent crime. Addressing not only primary victims of violent crime but collateral victims such as witnesses, family members, and others affected by violence. It is expected that this proactive approach to providing appropriate services to all affected by violent crime will have both short- and long-term positive implications to the quality of life for RRHA residents.

In addition to the above strategy, RRHA will be adding to its already existing over 300 cameras on RRHA properties in 2021. The PSD continues surveying environmental changes such as lighting and tree and shrub placement and trimming to enhance the safety of the communities.

VIOLENCE AGAINST WOMEN ACT (VAWA) STATEMENT

Richmond Redevelopment and Housing Authority addresses the Violence Against Women Reauthorization Act Final Rule (VAWA) in the Housing Choice Voucher Program (HCVP) Administrative Plan and the Public Housing Admissions and Continued Occupancy Policy (ACOP). The responsibility to not terminate families from housing for reasons that fall under the VAWA regulation is particularly addressed. RRHA has adopted HUD's Model Emergency Transfer Plan for victims of domestic violence, dating violence, sexual assault, or stalking in our housing programs.

We offer a local waiting list preference in the Public Housing program for victims of domestic violence, dating violence, sexual assault, and stalking working with case management.

The DPS has partnered with RPD to proactively address domestic violence, dating violence, sexual assault, and stalking in the housing communities by reaching out to victims not originally brought to the attention of RRHA Property Managers or Resident Services. After RPD and the Public Safety Director meet with the victims they are offered a follow-up meeting with a representative from the DPS, Resident Services, and the respective Property Manager. During this meeting the victim and other affected family members are offered services to address issues related to the trauma of their experience with domestic violence, dating violence, sexual assault, or stalking.

Additionally, RRHA will continue to follow VAWA program policies and regulations with the goal of providing safeguards for children and adult victims requiring VAWA protections and refer households, as needed, to local domestic violence service provider partners. RRHA has amended all policies to comply with VAWA.

ASSET MANAGEMENT

RRHA continues to comply with the Asset-Based Management activities required by federal regulation. RRHA continues to evaluate the effectiveness of centralized support services, staffing and Asset Management Projects (AMP) configurations. RRHA's business system (YARDI) provides site managers with a variety of reports required for effective management.

While continuing to face unprecedented challenges – funding shortages, an aging and decaying housing stock with tremendous capital needs, and a steady demand for affordable housing – RRHA continues to make decisions and take actions that will ensure that affordable housing remains available for current and future generations of Richmond's most vulnerable population. RRHA will implement multiple repositioning strategies to include RAD and RAD blend, Section 18 disposition, demolition, voluntary conversion, rehabilitation or modernization of properties within its portfolio to face the numerous challenges in maintaining units and managing the expenses associated in rehabilitation within the current economic conditions. Once completed, RRHA may utilize data from its current Green Physical Needs Assessment to determine priorities for repositioning and revitalization in order to transform the public housing inventory, deconcentrate poverty, and promote healthy and stable communities.

RRHA will continue to use its current Capital Fund Grant monies while seeking additional grant opportunities and alternate streams of revenue to: improve management efficiencies and for the physical improvement of its more than 4,000 public housing units; engage in redevelopment activities; engage in employee training and development that supports effective property management and program administration; develop and improve Section 3 opportunities; review and assess ways to improve energy efficiency; strengthen RRHA's redevelopment services and capacity; and address any work identified through REAC inspections and routine maintenance in order to continue receiving high REAC scores.

RRHA will conduct cost-effective operations to ensure financial viability, explore opportunities to improve efficiency, and comply with program standards within its AMPs.

Substantial deviation. RRHA must lay out its criteria for determining a "substantial deviation" from its 5-Year PHA Plan. (24 C.F.R. § 903.7(5)(2)(i)) RRHA shall consider the following actions as a substantial deviation from its 5-Year PHA Plan:

- (1) Any change, or collective series of changes, which would prohibit or redirect RRHA's strategic goals, or would prevent the implementation of RRHA's mission of sustaining or increasing the availability of decent, safe, and affordable housing, as such goals and mission are identified in the 5-Year Plan. This definition does not include customary budget revisions, changes in RRHA's administrative or organizational structure, changes required by or resulting from HUD-imposed regulations or other applicable law, or other minor policy changes.
- (2) Any change, or collective series of changes, in the planned or actual use of federal funds (as such use is identified in the 5-Year Plan) that exceeds 10% of RRHA's annual program budget for all combined public housing activities within the operative fiscal year. This definition includes changes in the planned or actual use of RRHA's Capital Funds. This definition does *not* include changes in the planned or actual use of RRHA funds other than federal funds.

Significant amendment or modification. RRHA must lay out its criteria for determining a “significant amendment or modification” to its Annual or 5-Year PHA Plans (including its Capital Fund 5-Year Action Plan). (24 C.F.R. § 903.7(5)(2)(i)). RRHA shall consider the following actions as a significant amendment or modification to such plans:

- (1) Changes to RRHA’s policies regarding rents, admissions policies, or the organization of waiting lists in RRHA’s Housing Choice Voucher or Low-Income Public Housing Programs, if such changes in policy would prohibit or substantially redirect RRHA’s strategic goals, or would prevent the implementation of RRHA’s mission of sustaining or increasing the availability of decent, safe, and affordable housing, as such goals and mission are identified in the applicable Annual or 5-Year PHA Plan. This definition does not include customary budget revisions, changes in RRHA’s administrative or organizational structure, changes required by or resulting from HUD-imposed regulations or other applicable law, or other minor policy changes.
- (2) The addition of non-emergency budget items not included in the operative Capital Fund Annual Statement or 5-Year Action Plan, if such items, collectively, exceed 10% of the Capital Funds budgeted for the relevant fiscal year. For the purpose of calculating whether such changes exceed 10% of budgeted Capital Funds for a given fiscal year, the use of replacement reserve funds for the Capital Fund shall be considered. Specifically included from this definitions is the addition of any budget item caused by or resulting from an approved RAD conversion, as described below.
- (3) Any change with regard to RRHA’s stated plans (i) to demolish or dispose of housing units governed by the Annual Contributions Contract, (ii) to the designate any public housing community exclusively for use by disabled or elderly families, (iii) to administer homeownership programs, or (iv) to implement a RAD conversion for RRHA public housing units not already identified in RRHA’s PHA Plans, subject to the further definitions described below.

Substantial deviations concerning RAD conversions. Specifically excluded from RRHA’s definitions of “substantial deviation” and “significant amendment or modification” to its PHA Plans are the following actions related to the Rental Assistance Demonstration (“RAD”) program:

- (1) The decision to convert public housing units to either Project-Based Rental Assistance (“PBRA”) or Project-Based Voucher (“PBV”) assistance as part of a RAD conversion authorized in the operative Annual and 5-Year Plans previously approved by HUD and the Board of Commissioners (an “approved RAD conversion”).
- (2) Changes to the Capital Fund budget cause by or resulting from an approved RAD conversion, regardless of whether such change will include the use of additional Capital Funds.
- (3) Changes to the construction or rehabilitation plan for any approved RAD conversion.
- (4) Changes to the financing structure of any approved RAD conversion.

B.2 – New Activities

HOPE VI or Choice Neighborhoods

RRHA anticipates applying for Choice Neighborhoods Initiative grants when the Notice of Funds Available is published. The application for Choice Neighborhoods Initiative Planning and/or Implementation Grants, will be for one or more of the following public housing developments: Creighton, Gilpin, Fairfield, Hillside, Mosby, and Whitcomb Courts.

To expedite the closure of its 20-year-old HOPE VI Grant, RRHA has approximately 96 vacant parcels that still exists in our inventory today. RRHA plans to procure developers to continue building homeownership units in accordance with approved HOPE VI Homeownership plan. However, RRHA will not provide any additional funding for the building of these homes. RRHA also plans to use its remaining ACC authority to complete the final phase of multi-family senior rental project. RRHA may utilize capital grant funds and HOPE VI funds to complete the remaining four (4) of the eighteen (18) units in the HOPE VI Cottages.

Mixed Finance Modernization or Development

RRHA's goal is to transform its entire public housing portfolio into quality affordable housing by offering a variety of housing options in an effort to reposition the agency's public housing developments into modern, better performing developments, as well as to improve the physical and social conditions of such developments.

For well over (25) twenty-five years RRHA's Real Estate and Community Development Department (RECD) has been responsible for redeveloping challenged neighborhoods that have not been invested in and neglected for some time. RRHA and/or its subsidiary entity(s) plans to either partner with other developers or self-develop its properties using HUD's repositioning resources as well as private and other public funding resources.

RRHA envisions a range of options that will be employed to achieve its goal to transform its portfolio which may include but not be limited to: modernization of existing public housing units; demolition of selected units and construction of new units; introduction of market rate and for-sale units; acquisition and development of new units in, around and outside of RRHA properties; voluntarily conversion to project-based assistance, and wholesale redevelopment of its public housing communities. RRHA plans to submit repositioning financial program applications/proposals to HUD.

Additionally acquisitions of vacant land or other existing rental properties adjacent to current public housing sites may also be initiated, subject to submission to and approval by HUD of the appropriate development proposals.

Other affordable housing developments and mixed-finance transactions (via acquisition or new construction or both) may be proposed later in the Plan year commensurate with the RRHA Strategic Plan. Financing may include use of regular Capital Funds or HUD's Capital Fund Financing Program (CFFP). CFFP involves borrowing against future flow of annual Capital Funds.

RRHA plans to pursue public housing development activities and may utilize other subsidiary entities for development, financing, and the formation of a variety of ownership structures, as well as utilize subsidiary entities for the operation of public and non-public housing programs.

RRHA intends to use Capital Funds and other public and private funds to redevelop its entire ACC portfolio, including and not limited to Creighton Court, Hillside Court, Fairfield Court, Whitcomb Court, Dove Street, Mosby South, Gilpin Court, Townes at River South, and Frederic Fay Towers, as well as other family and elderly developments. RRHA plans to select Development Partners for Creighton, Gilpin, Fairfield, Hillside, Mosby, and Whitcomb Courts and will conduct a community engagement process which will assist RRHA in arriving at a master plan for redevelopment for these communities. RRHA may also use Capital Funds and other funds to acquire and redevelop properties in and around its public housing communities. In addition, RRHA plans to utilize project-based vouchers for additional affordable housing initiatives, redevelopment projects, replacement housing options and relocation options for residents affected by redevelopment and disposition plans.

Demolition/Disposition/ Voluntary Conversion

This section describes whether HUD-approved applications by RRHA to demolish or dispose (sell) public housing projects owned by RRHA and subject to Annual Contributions Contracts (ACCs), or pending applications for demolition or disposition, have changed during the current plan year.

In such cases, RRHA would be required to describe the housing and the number of affected units for which it will apply (or for which it has pending applications) for demolition or disposition and provide a projected timetable for such demolition or disposition. Information on planned and pending demolition and disposition efforts is provided in the following tables.

RAD/Section 18 Blend

RRHA also propose that a portion of RRHA's public housing communities including Creighton, Gilpin, Hillside, Fairfield, Mosby, Whitcomb, 1200 Decatur St., 1611 4th Ave., 700 S. Lombardy, Afton Avenue, Bainbridge (28th/Moody), Melvin C. Fox Manor, Fulton, 3900 Old Brook Circle, Randolph Apartments, 1920 Stonewall Place, Oscar E. Stovall Place and Townes at River South may be partially disposed of through Section 18 and replaced with Project-Based Vouchers. RRHA may "Blend" projects utilizing project-based voucher (PBV) assistance through RAD conversion with assistance from tenant protection vouchers (TPVs) that are awarded through a Section 18 disposition approval. Projects may be "Blended" with RAD PBVs and Section 18 TPVs on a graduated scale based on the percentage of Housing Construction Costs (HCC) that is met as part of the RAD conversion.

RRHA received authorization from HUD to dispose of 110 of its public housing units previously approved by a Section 32 Homeownership plan. RRHA submitted applications for disposition of 66 units and a second application for 44 units. Individual houses within this scattered site project were sold or transferred to nonprofit developers to rehabilitation, marketing, and resale to families earning at or below 80% area median income. Other units were sold to third parties in accordance to approved disposition applications.

RRHA also received approval for disposition of 10 Overlook Small House/Used House scattered site public housing units.

Table #1	Demolition/Disposition Activity Description
1a. Development name: Small House/Used House	
1b. Development (project) number: VA007000016	
2. Activity type: Demolition <input checked="" type="checkbox"/>	
Disposition <input checked="" type="checkbox"/>	
3. Application status (select one)	

Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
Date application approved, submitted, or planned for submission: 4/28/2017 (Approved)
5. Number of units affected: 110 6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 7/15/2016 b. Projected end date of activity: 12/31/2021

Table #2	Demolition/Disposition Activity Description
1a. Development name: Small House/Used House (Overlook)	
1b. Development (project) number: VA007000016	
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>	
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>	
Date application approved, submitted, or planned for submission: November 2018 (Approved application)	
5. Number of units affected: 10	
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development	
7. Timeline for activity: a. Actual or projected start date of activity: 1/1/2018 b. Projected end date of activity: 12/31/2022	

Table #3	Demolition/Disposition Activity Description
1a. Development name: Fay Towers*	
1b. Development (project) number: VA007000501	
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>	
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>	
4. Date application approved, submitted, or planned for submission: 07/30/2017	
5. Number of units affected: 200	
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: 01/01/2015 b. Projected end date of activity: 12/31/2022	

- Note* Project is under a Rental Assistance Demonstration application.

Table #4 Demolition/Disposition Activity Description

1a. Development name: Gilpin Court
1b. Development (project) number: VA007000001
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: 11/2020 (planned application)
5. Number of units affected: 781
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 12/15/2016 b. Projected end date of activity: 12/31/2025

Table #5 Demolition/Disposition Activity Description

1a. Development name: Hillside Court
1b. Development (project) number: VA007000004
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: 11/2020 (planned application)
5. Number of units affected: 472
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 7/1/2021 b. Projected end date of activity: 12/31/2025

Table #6 Demolition/Disposition Activity Description

1a. Development name: Fairfield Court
1b. Development (project) number: VA007000007
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: 11/2020 (planned application)
5. Number of units affected: 447
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2021 b. Projected end date of activity: 12/31/2025

Table #7 Demolition/Disposition Activity Description

1a. Development name: Whitcomb Court
1b. Development (project) number: VA007000006
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: 11/2020 (planned application)
5. Number of units affected: 493
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2021 b. Projected end date of activity: 12/31/2025

Table #8 Demolition/Disposition Activity Description

1a. Development name: Mosby Court
1b. Development (project) number: VA007000008
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: 11/2020 (planned application)
5. Number of units affected: 458
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/30/2021 b. Projected end date of activity: 12/31/2025

Table #9 Demolition/Disposition Activity Description

1a. Development name: Creighton Court
1b. Development (project) number: VA007000005
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application approved, submitted, or planned for submission: 1/2019(submitted application)
5. Number of units affected: 192
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: 12/15/2016 b. Projected end date of activity: 12/31/2025

Table #10 Demolition/Disposition Activity Description

1a. Development name: Creighton Court
1b. Development (project) number: VA007000005
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: 11/2020 (planned application)
5. Number of units affected: 312
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 1/2021 b. Projected end date of activity: 12/31/2025

Table #11 Demolition/Disposition Activity Description

1a. Development name: Townes At River South
1b. Development (project) number: <u>VA007990000</u>
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: 06/2021 (planned application)
5. Number of units affected: 75
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: 1/2021 b. Projected end date of activity: 12/2023

Public Housing Homeownership Activity Description
(Complete one for each development affected)

1a. Development name: Greenwalk
1b. Development (project) number: VA36P00750106

2. Federal Program authority:
☐ HOPE I
☐ 5(h)
☐ Turnkey III
☒ Section 32 of the USHA of 1937 (effective 10/1/99)

3. Application status: (select one)
☒ Approved; included in the PHA's Homeownership Plan/Program
☐ Submitted, pending approval
☐ Planned application

4. Date Homeownership Plan/Program **approved**, submitted, or planned for submission: **11/10/2010**

5. Number of units affected: 20
 6. Coverage of action: (select one)
☐ Part of the development
☒ Total development

Public Housing Homeownership Activity Description
(Complete one for each development affected)

1a. Development name: Blackwell
1b. Development (project) number: VA36URD007I197

2. Federal Program authority:
☒ HOPE VI
☐ 5(h)
☐ Turnkey III
☐ Section 32 of the USHA of 1937 (effective 10/1/99)

3. Application status: (select one)
☒ Approved; included in the PHA's Homeownership Plan/Program
☐ Submitted, pending approval
☒ Planned application

4. Date Homeownership Plan/Program **approved**, submitted, or planned for submission: **11/10/2021**

5. Number of units affected: 99
 6. Coverage of action: (select one)
☐ Part of the development
☒ Total development



**Public Housing Homeownership Activity Description
(Complete one for each development affected)**

1a. Development name: Creighton Court
1b. Development (project) number: DDA0003029

2. Federal Program authority:
☐ HOPE I
☒ 5(h)
☐ Turnkey III
☐ Section 32 of the USHA of 1937 (effective 10/1/99)

3. Application status: (select one)
☒ Approved; included in the PHA's Homeownership Plan/Program
☐ Submitted, pending approval
☐ Planned application

4. Date Homeownership Plan/Program **approved**, submitted, or planned for submission: **11/10/2010**

5. Number of units affected: 1
6. Coverage of action: (select one)
☒ Part of the development
☐ Total development

Designated Housing for Elderly and/or Disabled Families

RRHA has operated certain public housing units as such, restricting occupancy to residents who are near elderly or elderly only. RRHA does not intend to newly designate any additional public housing units for occupancy by elderly and disabled families this fiscal year.

Designation of Public Housing Activity Description
1a. Development name: Blackwell Terrace 1b. Development (project) number: N/A
2. Designation type: Occupancy by only the elderly <input checked="" type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one) Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved , submitted, or planned for submission: (03/21/2014)
5. If approved, will this designation constitute a (select one) <input checked="" type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 18 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Conversion of Public Housing to Tenant-Based Assistance

This section describes, with respect to RRHA-owned public housing: 1) any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or that the public housing agency plans to voluntarily convert; 2) the analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion.

RRHA will continue to analyze units in its portfolio to be converted where the conversion to project- or tenant-based vouchers is economically beneficial and will increase housing opportunities. These communities include seeking additional funding authority in the voucher program to increase project-based opportunities at elderly and family public housing communities. RRHA may also elect to utilize Low-Income Housing Tax Credit equity and other resources to facilitate the conversion of the above-mentioned developments. RRHA intends to utilize this option for Gilpin Court, Whitcomb Court, Fairfield, Hillside, Creighton and Mosby Court.

Conversion of Public Housing to Project-Based Assistance under RAD

The Richmond Redevelopment and Housing Authority intends to submit multiple applications under the RAD program for the conversion of existing public housing to Project-Based Voucher or Project-Based Rental Assistance under the guidelines of PIH Notice 2019-23, REV-4 and any successor Notices. Upon conversion to Project-Based Voucher or Project-Based Rental Assistance, RRHA and/or new established ownership will adopt the resident rights, participation, waiting list and grievance procedures listed in for conversions to [Section 1.6 of H-2019-09 PIH Notice 2019-23, Rev-4; and H-2016-17/PIH-2016-17 \(PBV\) conversions; and Section 1.7 of H-2019-09 PIH Notice 2019-23, Rev-4; and H-2016-17/PIH-2016-17 \(PBRA\)](#). Such referenced documents are incorporated into this Annual Plan by reference as if fully laid out herein.

These resident rights, participation, waiting list and grievance procedures are attached to this notice. Additionally, the Richmond Redevelopment and Housing Authority is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Richmond Redevelopment and Housing Authority with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, RRHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Richmond Redevelopment and Housing Authority may also borrow funds to address their capital needs.

RAD/ Section 18 Blend

RRHA also proposes that a portion of RRHA's public housing communities including: Creighton, Gilpin Hillside, Fairfield, Mosby, Whitcomb, 1200 Decatur Street, 1611 4th Avenue, 700 S. Lombardy Street, Afton Avenue, Bainbridge (28th/Moody), Melvin C. Fox Manor, Fulton, 3900 Old Brook Circle, Randolph Apartments, 1920 Stonewall Place, Oscar E. Stovall Place and Townes at River South may be partially disposed of through Section 18 and replaced with the conversion of Tenant Protection Vouchers. RRHA may "Blend" projects utilizing project-based voucher (PBV) assistance through RAD conversion with assistance from tenant protection vouchers (TPVs) that are awarded through a Section 18 disposition approval. Projects may be "Blended" with RAD PBVs and Section 18 TPVs on a graduated scale based on the percentage of Housing Construction Costs (HCC) that is met as part of the RAD conversion. -

Please find specific information below related to the Public Housing Development(s) selected for RAD on Amendment #3.

Rental Assistance Demonstration (RAD) Amendment # 3

The Richmond Redevelopment and Housing Authority is amending its Annual PHA Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the Richmond Redevelopment and Housing Authority (RRHA) will be converting to Project Based Vouchers or Project Based Rental Assistance under the guidelines of H-2019-09 PIH Notice 2019-23 (HA), REV-4 and any successor Notices. Upon conversion to Project-Based Vouchers or Project-Based Rental Assistance, the Authority will adopt the resident rights, participation, waiting list, and grievance procedures described in **Section 1.6 of H-2019-09 PIH Notice 2019-23, Rev-4; and H-2016-17/PIH-2016-17 (PBV) conversions; and Section 1.7 of H-2019-09 PIH Notice 2019-23, Rev-4; and H-2016-17/PIH-2016-17(PBRA)**. These resident rights, participation, waiting list and grievance procedures are appended as an attachment and are incorporated into this Annual Plan by reference as if fully laid out herein. Additionally, the Richmond Redevelopment and Housing Authority certifies that it is currently compliant with all fair housing and civil rights requirements.



RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Richmond Redevelopment and Housing Authority with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, RRHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Richmond Redevelopment and Housing Authority may also borrow funds to address their capital needs. The Richmond Redevelopment and Housing Authority will also be contributing Operating Reserves and Capital Funds towards the conversion.

Below, please find specific information related to the Public Housing Development(s) selected for RAD:

DEVELOPMENT #1

<u>Name of Public Housing Development:</u> 1.Fay Towers	PIC Development ID: VA007000501	Conversion Type: PBRA	Transfer of Assistance: 200
<u>Total Units:</u> 200	<u>Pre-RAD Units:</u> 200	<u>Post- RAD Unit Type:</u> 199	<u>Capital Fund Allocation of Development:</u> \$312,408.00
Bedroom Type: Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom:	Number of Units Pre-Conversion: 120 80	Number of Units Post Conversion: 199* *77 units in Phase I *50 units in Phase II *72 units in Phase III	Change in Number of Units per bedroom type and Why: <u>Transfer of Assistance units are all three bedrooms with the exception of one unit located in Baker School apartments</u>
Complete	200	199	

Fay Towers Transfer of Assistance

- a. The location of assistance being transferred:
Transfer of Assistance will occur at three offsite locations
 - 1) Phase I (Highland Park Senior) – 77 Units: 1221 E Brookland Park Blvd, Richmond, VA 23222
 - 2) Phase II (Baker Street Apartments) – 50 Units: 100 West Baker Street
 - 3) Phase III (The Rosa) – 72 Units: 744 North Second Street
- b. **The number of units to be transferred**
A total of 199 Units will be transferred
- c. **Bedroom Distribution of units in new building**
Bedroom distribution of the units are 1-bedroom units
- d. **Any Reductions or change in the number of units**
Fay Towers, the conversion project is 200 Units. The 3-offsite locates total 199 Units. Unit reduction falls within the de minimis category.
- e. **How the waiting list will be transferred and how household will be selected for the transfer**
RRHA maintains a waiting list agency wide for all developments. Families will be selected for transfer based on their guaranteed right of return according to RAD regulations.
- f. **RRHA plans for original site following transfer of assistance**
RRHA has elected to operate the property exclusively for affordable housing purposes. The specific intended affordable housing purposes will include sales to affordable buyers, sales to market-rate buyers in communities to create income diversity, Fair Market Value sales or rentals where proceeds will be used for affordable housing purposes, parks and commercial purposes to serve the area's public housing, tax credit housing, section 8 RAD housing or other Federal or local housing programs serving households with incomes at or below eighty percent (80%) of area median income.

Site Selection and Neighborhood Standards Review for Transfer of Assistance

1. For All Transfers:

Description of the new site and how it is adequate for the needs of the tenants and is consistent with or furthers the goal of deconcentrating poverty.

The redevelopment of Fay Towers is part of RRHA's strategic plan to modernize its existing public housing developments as well as revitalize distressed neighborhoods, and spur additional development opportunities, specifically in the Highland Park and Jackson ward communities which are where the Fay Towers residents have been relocated. RRHA's first Rental Assistance Demonstration (RAD) project utilized a "Transfer of Assistance" strategy to relocate families to three off-site locations. Fay Towers, an 11-story, 200 unit building, may be converted to an affordable and/or mixed income development.

The Phase I portion of the Fay Towers redevelopment is located at 1221 E. Brookland Park Blvd. The project renovated a vacant existing public school building that was converted into a multifamily apartment building in the mid-1990s. The newly renovated senior building has enhanced amenities and improved living environments for seniors.

Phase II portion of the Fay Towers redevelopment will be located at 100 W. Baker Street where the plan calls for the renovation of a vacant existing public school building into 50 multifamily apartments. Once developed, the new senior housing will provide enhanced amenities and improved living environments for seniors.

Phase III portion of the Fay Towers redevelopment is the new construction of the Rosa, a 72-unit, all-senior RAD building. The new senior housing provides enhanced amenities and improved living environments for seniors.

2. If transferring assistance to an area of concentrated poverty:

Various methods for demonstrating furthering the goals of deconcentrating poverty include:

- Mixed-income developments;
- Development in a HUD Enterprise Zone, Economic Community, Renewal Community or a Revitalization Zone, including any areas where current or future HOPE VI or Choice Neighborhoods Initiative developments exist.

Phase I of the Fay Towers Redevelopment, which includes 77 units of senior housing and is located in the Highland Park community of Richmond VA, is not located in an area of concentrated poverty. The Highland Park neighborhood has been targeted for substantial City investment to revitalize the Northside gateway corridor with retail and other business opportunities; thereby, retaining and creating new jobs and economic vitality in that part of the City of Richmond. The successful completion of this project will help to serve and strengthen the already successful initiatives and programs implemented by the City of Richmond to revitalize the Highland Park community, including: the Highland Grove Development; the Neighborhoods in Bloom program supporting restoration of historic homes located in the Highland Park community; the storefront improvements within the commercial district; and the Six Points traffic circle improvement.

Census Tract: 108.00

Address: 1221 E. Brookland Park Blvd, Richmond VA. 23222

3. If transferring assistance to a development qualifying as new construction in an area of minority concentration:

- 1) Sufficiency of comparable opportunities for minority families in the income range to be served by the project outside areas of minority concentration;
- 2) Please examine 24 CFR §983.57(e) (3) (iv) & (v) to see more on comparable opportunities.

Fay Towers redevelopment site satisfies the Site Selection requirement for 24 CFR §983.57

Fay Towers Phase II is adequate in size, exposure, and contour to accommodate the number and type of units constructed. Adequate utilities and streets are available to service the site. The site promotes greater choice of housing opportunities and avoids undue concentration of assisted persons in areas containing a high proportion of low-income persons. It is accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted, standard housing of similar market rents.

Moreover, the site accommodates travel time and cost via public transportation or private automobile from the neighborhood to places of employment providing a range of jobs for lower-income workers.

The Rosa, a new construction project is adequate in size, exposure, and contour to accommodate the number and type of units proposed, and adequate utilities (water, sewer, gas, and electricity) and streets are available to service the site.

1) The site is located in a racially mixed area. The African-American population in the Richmond Metropolitan Statistical Area is 30%, whereas the subject site's census tract, 302, is 41% African-American. The site does not meet the definition of an area of minority concentration (an area of minority concentration occurs when a site's census tract has a minority concentration of 20 percentage points or higher than the larger MSA). The addition of 72 African-American residents to racially mixed Tract 302 would increase the African-American population from 41% to 43%, using the 2010 population as the base year. It is worth noting that in 2000, Tract 302 had a population that was 65% African American. Because of its proximity to VCU and VCU's growth over the past decade, housing in Jackson Ward is increasingly occupied by a younger population of White and Asian residents who are university students and employees. When including Latino residents, the wide diversity of the population nearly reflects that of the City.

2) *If there is an overriding housing need, which includes whether this is an integral part of an overall redevelopment strategy in a revitalizing area;*

Please see 24 CFR §983.57(e)(3)(vi) for more information on overriding housing needs.

The redevelopment of Fay Towers is part of a larger city of Richmond initiative to revitalize distressed neighborhoods, and spur additional development opportunities, specifically in the Highland Park and Jackson Ward communities, which are where the Fay Towers residents will be relocated upon the successful completion of the multi-phased Fay Towers redevelopment.

Development #2 NEW

<u>Name of Public Housing Development:</u> 1.Stonewall 2.Fox 3.Decatur 4.Lombardy 5.Old Brook 6. 4 th Avenue	<u>PIC Development ID:</u> VA007000503 & VA007000501	<u>Conversion Type:</u> PBV	<u>Transfer of Assistance:</u> 0
<u>Total Units:</u> 349	<u>Pre-RAD Units:</u> 349	<u>Post- RAD Unit Type:</u> Senior	<u>Capital Fund Allocation of Development:</u> <u>\$365,163.00</u>
<u>Bedroom Type:</u> Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom:	<u>Number of Units Pre-Conversion:</u> 15 334	<u>Number of Units Post Conversion:</u> 15 334	<u>Change in Number of Units per bedroom type and Why:</u>
Complete	349	349	

Development #3 NEW

<u>Name of Public Housing Development:</u> Stovall & Randolph	<u>PIC Development ID:</u> VA007000004 & VA007000006	<u>Conversion Type:</u> PBV	<u>Transfer of Assistance:</u> 0
<u>Total Units:</u> 82	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family /Senior	<u>Capital Fund Allocation of Development:</u> <u>\$754,650.00</u>
<u>Bedroom Type:</u> Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom: Five Bedroom: Complete:	<u>Number of Units Pre-Conversion:</u> 0 49 18 12 3 82	<u>Number of Units Post Conversion:</u> 0 49 18 12 3 82	<u>Change in Number of Units per bedroom type and Why:</u>

Development #4 NEW

<u>Name of Public Housing Development:</u> 1.Fulton, Afton Bainbridge)	<u>PIC Development ID:</u> VA007000501	<u>Conversion Type:</u> PBV	<u>Transfer of Assistance:</u> 0
<u>Total Units:</u> 122	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>Capital Fund Allocation of Development:</u> <u>\$469,477.00</u>
<u>Bedroom Type:</u> Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom: Five Bedroom: Complete:	<u>Number of Units Pre-Conversion:</u> 41 54 23 4 122	<u>Number of Units Post Conversion:</u> 41 54 23 4 122	<u>Change in Number of Units per bedroom type and Why:</u>

Development #5

<u>Name of Public Housing Development:</u> Townes at River South	<u>PIC Development ID:</u> VA007990000	<u>Conversion Type:</u> PBV/PBRA	<u>Transfer of Assistance:</u> 0
<u>Total Units:</u> 75	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>Capital Fund Allocation of Development:</u> <u>\$120,028.00</u>
<u>Bedroom Type:</u> Efficiency: One Bedroom: Two Bedroom: Three Bedroom: Four Bedroom: Five Bedroom: Complete:	<u>Number of Units Pre-Conversion:</u> 75	<u>Number of Units Post Conversion:</u> 75	<u>Change in Number of Units per bedroom type and Why:</u>

Development #6

<u>Name of Public Housing Development:</u> Gilpin Court	<u>PIC Development ID:</u> VA007000001	<u>Conversion Type:</u> PBV	<u>Transfer of Assistance:</u> 0
<u>Total Units:</u> 780	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>Capital Fund Allocation of Development:</u> <u>\$43,264.00</u>
<u>Bedroom Type:</u> Efficiency: One Bedroom: 103 Two Bedroom: 361 Three Bedroom: 228 Four Bedroom: 84 Five Bedroom: 4 Complete:	<u>Number of Units Pre-Conversion:</u> 781	<u>Number of Units Post Conversion:</u> 781	<u>Change in Number of Units per bedroom type and Why:</u>

Development #7

<u>Name of Public Housing Development:</u>	<u>PIC Development ID:</u> VA007000036	<u>Conversion Type:</u> PBV/PBRA	<u>Transfer of Assistance:</u> 0
<u>Total Units:</u> 8	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>Capital Fund Allocation of Development:</u> \$11,425.00
<u>Bedroom Type:</u> Efficiency: One Bedroom:3 Two Bedroom:3 Three Bedroom:2 Four Bedroom: Five Bedroom: Complete:	<u>Number of Units Pre-Conversion:</u> 8	<u>Number of Units Post Conversion:</u> 8	<u>Change in Number of Units per bedroom type and Why:</u>

Development #8

<u>Name of Public Housing Development:</u> Hillside	<u>PIC Development ID:</u> VA007000004	<u>Conversion Type:</u> PBV	<u>Transfer of Assistance:</u> 0
<u>Total Units:</u> 471	<u>Pre-RAD Units:</u> Family	<u>Post- RAD Unit Type:</u> Family	<u>Capital Fund Allocation of Development:</u> \$1,486,426.00
<u>Bedroom Type:</u> Efficiency: One Bedroom:80 Two Bedroom:232	<u>Number of Units Pre-Conversion:</u> 470	<u>Number of Units Post Conversion:</u> 470	<u>Change in Number of Units per bedroom type and Why:</u>



<u>Three Bedroom:131</u>			
<u>Four Bedroom:26</u>			
<u>Five Bedroom:1</u>			
<u>Complete:</u>			

Development #9

<u>Name of Public Housing Development:</u>	<u>PIC Development ID:</u>	<u>Conversion Type:</u>	<u>Transfer of Assistance:</u>
<u>Creighton Court</u>	<u>VA007000005</u>	<u>PBV</u>	<u>0</u>
<u>Total Units:</u>	<u>Pre-RAD Units:</u>	<u>Post- RAD Unit Type:</u>	<u>Capital Fund Allocation of Development:</u>
<u>504</u>	<u>Family</u>	<u>Family</u>	<u>\$1,571,898.00</u>
<u>Bedroom Type:</u>	<u>Number of Units Pre-Conversion:</u>	<u>Number of Units Post Conversion:</u>	<u>Change in Number of Units per bedroom type and Why:</u>
<u>Efficiency:</u>			<u>Increasing number of affordable units</u>
<u>One Bedroom:121</u>			
<u>Two Bedroom:207</u>			
<u>Three Bedroom:129</u>	<u>504</u>	<u>680</u>	
<u>Four Bedroom:46</u>			
<u>Five Bedroom:0</u>			
<u>Complete:</u>			

Development #10

<u>Name of Public Housing Development:</u>	<u>PIC Development ID:</u>	<u>Conversion Type:</u>	<u>Transfer of Assistance:</u>
<u>Whitcomb Court</u>	<u>VA007000006</u>	<u>PBV</u>	<u>0</u>
<u>Total Units:</u>	<u>Pre-RAD Units:</u>	<u>Post- RAD Unit Type:</u>	<u>Capital Fund Allocation of Development:</u>
<u>491</u>	<u>Family</u>	<u>Family</u>	<u>\$1,564,230.00</u>
<u>Bedroom Type:</u>	<u>Number of Units Pre-Conversion:</u>	<u>Number of Units Post Conversion:</u>	<u>Change in Number of Units per bedroom type and Why:</u>
<u>Efficiency:</u>			
<u>One Bedroom:62</u>			
<u>Two Bedroom:274</u>			
<u>Three Bedroom:116</u>	<u>491</u>	<u>491</u>	
<u>Four Bedroom:34</u>			
<u>Five Bedroom:5</u>			
<u>Complete:</u>			

RRHA is utilizing a mixed-finance approach for replacement of its public housing developments under RAD. Mixed-finance development emphasizes the formation of new public and private partnerships to ensure long-term sustainability of public housing developments and the leveraging of public and private resources to transform the isolated communities in which many public housing residents currently live into vibrant and sustainable “mixed-income” communities with a wide range of family incomes.

Development #11

<u>Name of Public Housing Development:</u>	<u>PIC Development ID:</u>	<u>Conversion Type:</u>	<u>Transfer of Assistance:</u>
Fairfield Court	VA007000007	PBV	0
<u>Total Units:</u>	<u>Pre-RAD Units:</u>	<u>Post- RAD Unit Type:</u>	<u>Capital Fund Allocation of Development:</u>
447	Family	Family	\$1,425,687.00
<u>Bedroom Type:</u>	<u>Number of Units Pre-Conversion:</u>	<u>Number of Units Post Conversion:</u>	<u>Change in Number of Units per bedroom type and Why:</u>
<u>Efficiency:</u>			
<u>One Bedroom:61</u>			
<u>Two Bedroom:222</u>			
<u>Three Bedroom:111</u>	445	445	
<u>Four Bedroom:46</u>			
<u>Five Bedroom:5</u>			
<u>Complete:</u>			

The mixed-finance approach utilizes various financial resources and partnership opportunities. Therefore, it may be necessary to re-align the various developments based on financial feasibility, and or other factors for project implementation.

Resident Rights, Participation, Waiting List and Grievance Procedures

If converting to PBV: (Insert PIH Notice 2012-32, REV-3 Section 1.6.C & Section 1.6.D, and Joint Housing/PIH Notice H-2014-09/ PIH-2014-17, as a whole, into this Attachment to your PHA Plan)

A. PBV Resident Rights and Participation.

- 1. No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.¹ Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, this provision shall apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR § 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.²
- 2. Right to Return.** See section 1.4.A.5(ii) and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return.
- 3. Renewal of Lease.** Since publication of the PIH Notice 2012-32 Rev 1, the regulations under 24 CFR part 983 have been amended requiring Project Owners to renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.
- 4. Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the

¹ 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.

² For non-RAD PBV households, applicable program requirements includes the requirement that any admission to the project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time.

phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section “Calculated PBV TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

Three Year Phase-in:

- 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 TTP³

Five Year Phase in:

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

Please Note: In either the three-year phase-in or the five-year phase-in, once the Calculated PBV TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies must also implement a three or five-year phase-in for impacted residents, but may alter the terms above as long as it establishes a written policy setting forth the alternative terms.

³ 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 residents’ contribution would increase by 50% of the \$66 differential to the standard TTP, increasing to \$166. At the third AR, the resident’s contribution would increase to \$200 and the resident would continue to pay the Calculated PBV TTP for the duration of their tenancy.

- 5. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are currently FSS participants will continue to be eligible for FSS once their housing is converted under RAD. The PHA may continue to use any FSS funds already awarded to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding and may use that funding to serve PH, HCV and/or PBRA participants in its FSS program. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.⁴ Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

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

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a non-profit or local Resident Association and this consequence of a RAD conversion may impact those entities.

- 6. Resident Participation and Funding.** In accordance with Attachment 1B, residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.
- 7. Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum, as

⁴ 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.

appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

- i. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be :
 - a. A reasonable period of time, but not to exceed 30 days:
 - i. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - ii. In the event of any drug-related or violent criminal activity or any felony conviction;
 - b. Not less than 14 days in the case of nonpayment of rent; and
 - c. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
- ii. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For issues related to tenancy and termination of assistance, PBV program rules require the Project Owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi),⁵ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease **or** the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
 - ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.

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

- b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
- c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- d. The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

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

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the 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.

Jobs Plus. Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance at that site unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project.

2. **When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's

TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice.⁶ 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.

Following conversion, 24 CFR § 983.53(d) applies, and any new families referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has vacated the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR § 983.207 or, where "floating" units have been permitted, Section 1.6.B.10 of this Notice.

- 3. Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

A. PBV: Other Miscellaneous Provisions

- 1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
- 2. Additional Monitoring Requirement.** The Owner must submit to the administering PHA and the PHA's Board must approve the operating budget for the Covered Project annually in accordance with HUD requirements.⁷

⁶ 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.

⁷ For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of monitoring and evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

- 3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** This section has been moved to 1.4.A.13 and 1.4.A.14.
- 4. Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
 - i. Transferring an existing site-based waiting list to a new site-based waiting list.
 - ii. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
 - iii. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
 - iv. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in

accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).⁸

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

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c).

RRHA does not currently utilize site-based waiting lists within its public housing program, and has no plan to do so within the time periods covered by this Plan.

- 5. Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
- 6. Agreement Waiver.** This section has been moved to 1.6.B.8.
- 7. Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC.
- 8. Administrative Fees for Public Housing Conversions during the Year of Conversion.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds. For example, if the project’s assistance converts effective July 1, 2015, the public housing ACC between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV HAP Contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.

PHAs operating HCV program typically receive administrative fees for units under a HAP Contract, consistent with recent appropriation act references to “section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Work Responsibility Act of 1998” and 24 CFR § 982.152(b). During the year of conversion mentioned in the preceding paragraph, these provisions are waived. PHAs will not receive Section 8 administrative fees for PBV RAD units during the year of conversion.

⁸ 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.

After the year of conversion, the Section 8 ACC will be amended to include Section 8 funding that corresponds to the units covered by the Section 8 ACC. At that time, the regular Section 8 administrative fee funding provisions will apply.

- 9. Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

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

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

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

- 10. Reserve for Replacement.** The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account or similar instrument, as approved by HUD, where funds will be held by the Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines.

Resident Rights, Participation, Waiting List and Grievance Procedures

PBV Conversion: Joint Housing/PIH Notice H-2014-09/ PIH-2014-17, as a whole, is attached to this RRHA PHA Plan Amendment in its entirety.

As a part of the Rental Assistance Demonstration (RAD), RRHA is redefining the definition of the substantial deviation from the PHA Plan to exclude the following RAD specific items:

- a.** The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;

- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d. Changes to the financing structure for each approved RAD conversion.

Special Provisions Affecting Conversions to PBRA

Under the Demonstration, HUD has RRHA to waive statutory and regulatory provisions governing the PBRA program, or to establish alternative requirements for the effective conversion of assistance. Additionally, the RAD Statute imposes certain unique requirements and authorizes HUD to establish requirements for converted assistance under the Demonstration.

For public housing projects converting assistance to PBRA under the First Component of the Demonstration, 24 CFR part 880, Section 8 Housing Assistance Payments Program for New Construction as modified for RAD and as set forth in Appendix I, and applicable existing and subsequent Office of Housing guidance⁴⁴ will apply, except for the provisions listed below. These “special” provisions are grouped into three categories: Contract Terms, Resident Rights and Participation, and Other Miscellaneous Provisions. Where applicable, reference is made to the affected statute and/or regulation. For additional background purposes, HUD has provided Appendix I, which is a copy of the existing 24 CFR part 880 regulation with the provisions stricken that will not apply to Covered Projects. Additionally, Appendix II includes the specific provisions of the Act that are inapplicable to PBRA conversions. Finally, Appendix III includes the site and neighborhood standards that apply to PBRA.

A. PBRA Contract Terms.

1. **Length of Contract.** Covered Projects shall have an initial HAP Contract term of 20 years. To implement this provision, HUD is specifying alternative requirements for section 8(d)(2)(A) of the Act, which establishes a maximum term of 15 years for “an existing structure.” Additionally, 24 CFR § 880.502, which imposes maximum contract terms for New Construction projects consistent with statutory authority that was repealed in 1983, does not apply.
2. **Mandatory Contract Renewal.** Section 524 of MAHRAA and 24 CFR part 402 currently govern renewals of expiring or terminating project-based section 8 HAP Contracts and, in general, require HUD to renew such contracts “at the request of the owner.” Pursuant to the RAD Statute, upon expiration of the initial contract and each renewal contract, the Secretary or Contract Administrator must offer, and the Project Owner must accept, renewal of the contract subject to the terms and conditions applicable at the time of renewal and the availability of appropriations each year of such renewal. The renewal contract(s) shall be for the prescribed number and mix of units but may, upon request of the Project Owner and subject to HUD approval, be on one or more transfer of assistance sites in lieu of the project site subject to the expiring contract. Consequently, to the extent that section 524 of MAHRAA and 24 CFR part 402 are in effect upon contract expiration, the various provisions stating or requiring that any renewal of an expiring contract for project-based assistance under Section 8 shall be “at the request of the owner” will not apply.
3. **Ownership or Control.** This section has been moved to Section 1.4.A.11.

4. RAD Use Agreement. This section has been moved to Section 1.4.A.13

5. Initial Contract Rent Setting. No additional or incremental funding is associated with this Demonstration. Consequently, HUD is specifying alternative requirements for section 8(c)(1) of the Act, which governs rent setting for project-based Section 8 units, and for section 8(c)(5) of the Act or 24 CFR § 880.503(b), which govern the “project account.” HUD has calculated initial contract rents for every public housing project based on each project’s subsidy under the public housing program. All RAD applications, including applications for Portfolio Awards, will have initial contract rents based on their “RAD rent base year,” described in Attachment 1C. PHAs have additional discretion in establishing initial contract rents using the following flexibility:

- a. MTW Fungibility.** MTW agencies may use their MTW funds to set the initial contract rents higher than the normally applicable contract rent cap that is based on the project’s public housing subsidy. In addition to the rent cap described below, contract rents cannot exceed comparable market rent, as determined by a Rent Comparability Study. Any use of MTW funding flexibilities in setting initial contract rents shall be subject to subsidy layering review and MTW continued service requirements, as calculated using the MTW Baseline Methodology described in Notice PIH 2013-02, or successor Notice. If an MTW agency converts a project to PBRA and uses this flexibility to increase their initial contract rents, HUD will reduce the agency’s public housing subsidy by the additional amount (in addition to any funding modifications that would occur as a result of the conversion absent the rent increase) required to fund the PBRA HAP (see Attachment 1C). HUD will limit the number of projects an MTW agency may convert to PBRA if the PHA does not have sufficient public housing subsidy to convert into PBRA assistance.
- b. Rent Bundling.** PHAs may adjust subsidy (and initial contract rents) across multiple projects as long as the PHA does not exceed the aggregate subsidy for all of the projects the PHA has submitted for conversion under RAD. For example, assume that a PHA is considering bundling two identical projects, both consisting of 100 units. In Project A, the contract rent is \$500; and in Project B, the contract rent is \$600. The PHA could bundle the two projects such that the initial contract rents for both projects will be \$550. This use, which HUD refers to as “bundled” rents, can occur under the following scenarios:
 - i. When a PHA is converting two or more properties within its public housing portfolio. The execution and effective date of the HAP Contract for the donor HAP Contract must occur prior to or simultaneous with the effective date of the recipient HAP Contract; and
 - ii. When PHAs have formed a Partnership in accordance with Section 1.5.M and are bundling rents between two or more converting projects. The execution and effective date of the HAP Contract for the donor HAP Contract must occur prior to or simultaneous with the effective date of the recipient HAP Contract.

Please note that per Section 1.13.B.5, regardless of the initial contract rents for the RAD HAP Contract, including as modified by this provision, in the year of conversion the Covered Project will only be assisted by the Operating and Capital Funds obligated to the PHA for that project.

- c. Future Demolition Disposition Transition Funding (DDTF).** PHAs that are scheduled to receive DDTF (funds that have not been awarded and, with HUD permission, funds that have been awarded but not yet disbursed) may choose to forgo any ongoing DDTF grants for the purpose of offsetting an increase to the RAD rent. See Attachment 1C for the calculation of how DDTF funding may offset increased RAD rent.
- d. Tenant Paid Utility Savings.** When conversion will result in the reduction of one or more utility components (e.g., gas, water & sewer, electric) used to establish the Utility Allowance, HUD will permit the RAD contract rent to be increased by a portion of the utility savings. See Attachment 1C for additional detail. The Utility Allowance shall be recalculated based on actual consumption within a reasonable period following completion of the work.
- e. New Construction or Substantial Rehab.** For any transaction that is proposed in its Financing Plan to undertake new construction or substantial rehabilitation in a designated Opportunity Zone, HUD may provide up to a \$100 per unit per month (PUM) increase to the RAD rents, subject to the availability of funds and such conditions as HUD may impose. For purposes of this subparagraph, new construction or substantial rehabilitation is defined as hard construction costs, including general requirements, overhead and profit, and payment and performance bonds, in excess of 60% of the Housing Construction Costs as published by HUD for a given market area. Funds for this purpose shall be allocated on a first-come, first served basis, subject to the availability of funds, based on the time of the request (communicated through the submission of a complete and acceptable Financing Plan), where the PHA demonstrates it is necessary for the viability of the transaction.

Notwithstanding HUD's calculation or the above-mentioned flexibilities, initial contract rents will be capped at 120 percent of the Section 8 FMR, adjusted by the number of bedrooms, and after subtracting any applicable utility allowance. However, when HUD's calculation of contract rents exceeds 120 percent of the FMR but where the PHA believes that such rents are below the comparable market rent, the PHA may request an exception under which the project may receive rents in excess of 120 percent of the FMR but not in excess of the lower of comparable market rents or 150 percent of FMR. HUD will grant such a request only when HUD determines that a Rent Comparability Study (RCS), which the PHA must procure and pay for, establishes that rents are below comparable market rents. Any such determination will be made by HUD in its sole and absolute discretion. Where initial contract rents are at or below 120 percent of the FMR, no RCS is required.

- 6. Method of Adjusting Contract Rents.** Contract rents will be adjusted only by HUD's OCAF at each Anniversary of the HAP Contract, subject to (a) the availability of appropriations for each year of the contract term, and (b) the Maximum Rent, as defined below.⁴⁸

The Maximum Rent is the higher of 140% of FMR (less utility allowances) or the market rents, as demonstrated by an RCS procured and paid for by the Project Owner. Where an RCS has been used to establish initial rents or to justify an OCAF adjusted rent that exceeds 140% of the FMR, the RCS will remain valid for five years, the Maximum Rent will not apply for the next four annual rent adjustments, and rents will be adjusted only by the OCAF during such period.

7. Distributions. Regardless of type of financing, Covered Projects will not be subject to any limitation on distributions of Surplus Cash, contingent on the availability of Surplus Cash as determined by year-end audited or certified financial statements. To implement this provision, HUD will not apply 24 CFR § 880.205, which, among other provisions, establishes certain limitations on distributions for profit-motivated owners and authorizes HUD to require the owner to establish a residual receipts account. Distributions are not considered program or project funds.

8. RAD Rehab Assistance Payments. HUD and the Project Owner typically will enter into a HAP Contract before construction begins. During the period of Work identified in the RCC, standard HAP Contract administration procedures will be used for occupied units. Except where the Section 8 Pass-Through⁴⁹ is used, units covered under the HAP Contract that are not occupied at any point during the period of Work identified in the RCC may be eligible, subject to the conditions below, for Rehab Assistance Payments equal to the Public Housing Operating Fund and the Capital Fund amounts that formed the basis for the calculation of initial contract rents (see Attachment 1C). During the period of rehabilitation or construction as identified in the RCC, the maximum number of units for which a Project Owner can receive RAD Rehab Assistance Payments is limited to the number of units eligible for Operating Fund or Capital Fund subsidy prior to conversion. As a result, some units in the

Covered Project may not be eligible for Rehab Assistance Payments. As necessary to implement this provision, HUD is suspending the applicability of additional provisions in 24 CFR § 880.504(a) until all contract units are made available for occupancy and waiving the applicability of section 8(c)(4) of the Act.

The Project Owner will no longer be eligible to receive RAD Rehab Assistance Payments upon the earlier of completion of the Work or expiration of the time period identified in the RCC for completion of all Work, which date is specified in the HAP contract. After such date, all units under the HAP Contract will be eligible for payment only for occupied units or for vacancy payments, as applicable.

9. Future Statutory or Administrative Changes. Consistent with PBRA HAP Contracts entered into under MAHRAA, any changes in HUD requirements, except to the extent required by statute, that are inconsistent with the PBRA HAP Contract entered into through RAD, shall not be applicable. Further, for any statutory change during the term of the contract affecting contract rents that HUD determines will threaten the physical viability of the property, the Owner may terminate the contract upon notification to HUD. Notwithstanding such termination, the project shall remain subject to the RAD Use Agreement encumbering the property on which the project is located.⁵⁰

10. Floating Units. Upon the request of the Project Owner of a Covered Project that is partially-assisted (i.e., fewer than 100% of the units are covered by the HAP Contract), HUD will permit the Section 8 assistance to float between units within the project that have the same bedroom size and the same contract rent; from the time of the initial execution of the HAP Contract, the property must maintain the same number and type of RAD units. As a condition for granting such request, HUD requires that the unassisted units be inspected with the same frequency as the assisted units are required to be inspected under 24 CFR part 200, subpart P. Assistance may float from a required UFAS unit only to another UFAS unit that has the same bedroom size and accessibility features. If assistance floats to a UFAS unit as a reasonable accommodation for a household

that had not previously been in a UFAS unit, the assistance may float back to a non-Section 504 unit when there is no longer need for the reasonable accommodation provided the required number of UFAS units is maintained.

- 11. UPCS (REAC) Inspections.** Under current regulations at 24 CFR part 5, subpart G, a unit covered under a PBRA HAP Contract must meet the UPCS before assistance can be paid on behalf of a household. Under RAD, once all units under the HAP Contract become occupied, HUD will order a REAC inspection of the property to ensure conditions meet the UPCS. HUD is hereby waiving and establishing this alternative requirement to 24 CFR part 5, subpart G.

B. PBRA Resident Rights and Participation

- 1. No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.⁵¹ Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBRA 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, the first clause of section 8(c)(4) of the Act and 24 CFR § 880.603(b), concerning determination of eligibility and selection 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. Further, so as to facilitate the right to return to the assisted property, this provision shall apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR § 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.⁵²
- 2. Right to Return.** See section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return.
- 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 PBRA 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. Eligibility for the phase-in is to be determined at the Initial Certification which occurs at the time the household is converted to PBRA. A phase-in must not be applied after the household's Initial Certification. To implement the phase-in, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 880.201 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years, or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a

PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section “Calculated Multifamily TTP” refers to the TTP calculated in accordance with regulations at 24 CFR § 5.628 (not capped at Gross Rent) and the “most recently paid TTP” refers to the TTP recorded on the family’s most recent HUD Form 50059. If a family in a project converting from Public Housing to PBRA was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below...

Three Year Phase-in:

- 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 Multifamily TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) in prior to Year 3 AR – 50% of difference between most recently paid TTP and Calculated Multifamily TTP
- Year 3: Year 3 AR and all subsequent recertifications – Year 3 AR and any IR in Year 3: Full Calculated Multifamily TTP53

Five Year Phase-in

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

Please Note: In either the three-year phase-in or the five-year phase-in, once Calculated Multifamily TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full Calculated Multifamily TTP from that point forward

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 once their housing is converted under RAD. Through waiver in this Notice, FSS grant funds may be used to continue to serve such FSS participants. All Project Owners will be required to administer the FSS program or partner with another agency to administer the FSS program in

accordance with the requirements of 24 CFR part 984, the participants' contracts of participation, and current and future guidance published by HUD for all FSS participants enrolled in the FSS program prior to RAD conversion. All Project Owners will be required to provide both service coordination and payments to escrow until the end of the Contract of Participation for each resident. To ensure that HAP payments are processed correctly, and until TRACS is modified, the Project Owner must notify MF_FSS@hud.gov that there are current FSS participants residing in the Covered Project and adhere to the escrow and reporting requirements in Notice H 2016-08. The Project Owner may enter into a Cooperative Agreement with the PHA (the grantee), allowing the PHA to continue to provide service coordination to RAD-affected PBRA participants until all have completed their Contracts according to 24 CFR § 984.303. The Project Owner must assume responsibility for the administrative duties associated with FSS such as calculating and crediting escrow and reporting. Ultimately, the new Project Owner is responsible for serving the RAD-affected FSS participants until the end of their CoPs.

The owner is not required to enroll new participants, but may choose to run its own voluntary FSS program in accordance with Notice H 2016-08.

At the completion of the FSS grant, grantees should follow the normal closeout procedures outlined in the grant agreement. Future FSS NOFAs will identify eligible FSS participants. Until HUD implements provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act that expand eligibility for FSS to PBRA properties, only a PHA that continues to run an FSS program that serves public housing and/or HCV/PBV FSS participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding and may use that funding to serve public housing, HCV and/or RAD-affected PBRA FSS participants. However, if the PHA no longer has a public housing or HCV program, the PHA is not eligible to apply for FSS funding.

Upon conversion, if the PHA has closed out its public housing program in accordance with Notice PIH 2019-13, funds escrowed under the public housing program for FSS participants shall be transferred into the PBRA escrow account and be considered PBRA funds, thus reverting to PBRA if forfeited by the FSS participant.

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, as ROSS-SC, by statute, can serve only public housing residents. At the completion of the ROSS-SC grant, grantees should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be non-profits or local Resident Associations and this consequence of a RAD conversion may impact those entities.

5. Resident Participation and Funding. Residents of Covered Projects with assistance converted to PBRA will have the right to establish and operate a resident organization in accordance with 24 CFR part 245 (Tenant Participation in Multifamily Housing Projects). In addition, in accordance with Attachment 1B, residents will be eligible for resident participation funding.

6. Resident Procedural Rights. The information provided below must be included as part of the House Rules for the associated project and the House Rules must be submitted to HUD for review prior to Closing. See Attachment 1E for a sample Addendum to the House Rules.

a. Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects converting assistance under RAD, that supplement notification requirements in regulations at 24 CFR § 880.607 and the Multifamily HUD Model Lease.

- i. Termination of Tenancy and Assistance. The termination procedure for RAD conversions to PBRA will additionally require that Project Owners provide adequate written notice of termination of the lease which shall be:
 1. A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction;
 2. Not less than 14 days in the case of nonpayment of rent; and 3. 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. Termination of Assistance. In all other cases, the requirements at 24 CFR § 880.603, the Multifamily HUD Model Lease, and any other HUD multifamily administrative guidance shall apply.

b. Grievance Process. Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act. In addition to program rules that require that tenants are given notice of covered actions under 24 CFR part 245 (including increases in rent, conversions of a project from project-paid utilities to tenant-paid utilities, or a reduction in tenant paid utility allowances), HUD requires that:

- i. Residents be provided with notice of the specific grounds of the Project Owner's proposed adverse action, as well as their right to an informal hearing with the Project Owner;
- ii. Residents have an opportunity for an informal hearing with an impartial member of the Project Owner's staff within a reasonable period of time;
- iii. Residents have the opportunity to be others make statements at the hearing, and to examine any regulations and any evidence relied upon by the Project Owner as the basis for the adverse action. With reasonable notice to the Project Owner, prior to hearing and at the residents' own cost, residents may copy any documents or records related to the proposed adverse action; and iv. Project Owners provide the resident with a written decision within a reasonable period of time stating the grounds for the adverse action and the evidence the Project Owner relied on as the basis for the adverse action.

The Project Owner shall be bound by decisions from these hearings, except if (x) the hearing concerns a matter that exceeds RRHA of the impartial party conducting the hearing, or (y) the decision is contrary to HUD regulations or requirements, or otherwise contrary to federal, State, or local law. If the Project Owner determines

that it is not bound by a hearing decision, the Project Owner must promptly notify the resident of this determination, and of the reasons for the determination.

c. Family Right to Move. Pursuant to Section 1.7.C.5 and unless the Covered Project received a specific good cause exemption to such provision, families have a choice-mobility right which must be stated in the House Rules as shown in sample in Attachment 1E.

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 exclusion after conversion, in accordance with regulations at 24 CFR § 960.255. After conversion, no other tenants will be eligible to receive the EID. If a tenant receiving the EID exclusion undergoes a break in employment, ceases to use the EID exclusion, or the EID exclusion expires in accordance with 24 CFR § 960.255, the tenant will no longer receive the EID exclusion and the Owner will no longer be subject to the provisions of 24 CFR § 960.255. Furthermore, tenants whose EID ceases or expires after conversion shall not be subject to the rent phase-in provision, as described in Section 1.7.B.3; instead, the rent will automatically be adjusted to the appropriate rent level based upon tenant income at that time.

8. Jobs Plus Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target project(s) under RAD will be able to finish out their Jobs Plus grant 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. 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 offered at the target project that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion. If the program is continued, the Project Owner must agree to continue to implement the program according to HUD's program requirements.

9. When Total Tenant Payment Exceeds Gross Rent. Under the PBRA program, assisted families typically pay 30% of adjusted gross income toward rent and utilities, referred to as TTP. Under normal PBRA rules, a Project Owner must process a termination of assistance pursuant to section 8-5 C. of Housing Handbook 4350.3, REV-1 when 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). In addition, section 8-6 A.1 provides that, when terminating a tenant's assistance, the owner is to increase the tenant rent to the contract rent (assuming that the tenant does not receive the benefit of any other type of subsidy).

For residents living in the Converting Project on the date of conversion and all new admissions to the Covered Project thereafter, when TTP equals or exceeds the contract rent plus any utility allowance, the Project Owner must charge a tenant rent equal to the lesser of (a) TTP (which is not capped at gross rent), less the utility allowance in the contract, or (b) any applicable maximum rent allowable under LIHTC regulations.⁵⁴ To this end, HUD is waiving sections 8-5 C. and 8-6 A. 1. of Housing Handbook 4350.3, REV-1. In such cases, the tenant will still be considered a Section 8 tenant and will still have the rights and be subject to the requirements of Section 8 tenants. Tenants will retain all of the rights under the Model Lease, including the right to occupy the unit, as well

as those provided through this Notice, and tenants will still be subject to the requirements for Section 8 tenants, including the requirements concerning reexamination of family income and composition found in 24 CFR §§ 5.657 and 880.603(c). When TTP equals or exceeds Gross Rent, the excess rent collected by the owner is considered project funds and must be used for project purposes. Assistance may subsequently be reinstated if the Tenant becomes eligible for assistance. In the event that the tenant moves out, the Project Owner must select an applicant from the waiting list who meets the applicable income limits for the project.

The Project Owner is not required to process these individuals through Multifamily Housing's Tenant Rental Assistance Certification System (TRACS) but may be required to do so in the future when a future revision of the TRACS can accept such certifications. All normal actions for the contract rent shall continue for these units, including application of the OCAF adjustment to the contract rent indicated in the HAP Contract—since the OCAF adjusted rent will still be in effect whenever the unit is occupied by a family eligible for rental assistance.

10. Under-Occupied Units. If at the time of conversion, an eligible family assisted under the HAP Contract is occupying a unit that is larger than appropriate because of the family's composition, the family may remain in the 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 within a reasonable period of time. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, HUD is waiving the portion of 24 CFR § 880.605 that assumes the unit has become under-occupied as the result of a change in family size.

C. PBRA: Other Miscellaneous Provisions

- 1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.
- 2. Davis-Bacon prevailing wages and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** These sections have been moved to 1.4.A.13 and 1.4.A.14.
- 3. Establishment of Waiting List.** The Project Owner can utilize a project-specific or community waiting list. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
 - a. Transferring an existing site-based waiting list to a new site-based waiting list.
 - b. Transferring an existing site-based waiting list to a PBRA program-wide waiting list.
 - c. Transferring an existing community-wide public housing waiting list to a PBRA program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
 - d. 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.

To the extent the 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 waiting 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 communitywide 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).⁵⁵

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 allows for easier moves between assisted properties. Any such preference must be approved by HUD in accordance with Notice H 2013-21, prior to implementation.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 880.603 regarding selection and admission of assisted tenants. However, after the initial waiting list has been established, the Project Owner shall administer its waiting list for the Covered Project in accordance with 24 CFR § 880.603.

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

4. **Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project.
5. **Choice-Mobility.** HUD seeks to provide all residents of Covered Projects with viable Choice-Mobility options. Unless provided an exemption as described below, PHAs that are applying to convert the assistance of a project to PBRA are required to provide a Choice-Mobility option to residents of Covered Projects in accordance with the following: 56

- a. **Resident Eligibility.** Residents have a right to move with tenant-based rental assistance (e.g., Housing Choice Voucher (HCV)) the later of: (a) 24 months from date of effective date of the HAP or (b) 24 months after the move-in date.
- b. **Voucher Inventory Turnover Cap.** Recognizing the limitation on the availability of turnover vouchers from year to year, a voucher agency would not be required, in any year, to provide more than one-third of its turnover vouchers 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.
- c. **Project Turnover Cap.** Also recognizing the limited availability of turnover vouchers and the importance of managing turnover in the best interests of the property, in any year, a Project Owner and voucher agency may agree to limit the number of Choice-Mobility moves exercised by eligible households to 15 percent of the assisted units in the project. (For example, if the project has 100 assisted units, the Project Owner and voucher agency could limit the number of families exercising Choice Mobility to 15 in any year, but not to less than 15.) While a Project Owner and voucher agency are not required to establish a project 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.

The voucher agency must maintain a written agreement with the owner describing how the Choice-Mobility option will be administered in accordance with these requirements and the process by which households may request a voucher. For example, the written agreement must specify whether the owner will receive requests from families or refer families to the PHA.

HUD's goal is to have all residents in the Demonstration offered a Choice-Mobility option within a reasonable time after conversion. However, as HUD recognizes that not all voucher agencies will have vouchers sufficient to support this effort, HUD will take the following actions:

- Provide voucher agencies that make such a commitment bonus points provided under the Section Eight Management Assessment Program (SEMAP) for deconcentration.
- Grant a good-cause exemption from the Choice-Mobility requirement for no more than 10 percent of units in the Demonstration. HUD will consider requests for good-cause exemptions only from the following types of PHAs: o Public housing-only agencies, defined as agencies that own units under a public housing ACC, but do not administer, directly or through an affiliate, a Housing Choice Voucher program with non-special purpose vouchers; or of Combined agencies that currently have more than one-third of their turnover vouchers set aside for veterans, as defined for the purpose of

HUD-VASH, or homeless populations, as defined in 24 CFR § 91.5.58 To be eligible for this exemption, the PHA's admission policies must have been formally approved by the PHA's board prior to the time of application.

6. Future Refinancing. Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any

permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC, but HUD review of liens must be performed prior to execution.

- 7. Submission of Year-End Financial Statements.** Projects converting assistance to PBRA must comply with 24 CFR part 5, subpart H, as amended, revised, or modified by HUD.59
- 8. Classification of Converting Projects as Pre-1981 Act Projects under Section 16(c) of the United States Housing Act of 1937.** For purposes of ensuring maximum flexibility in converting to PBRA, all projects converting to PBRA shall be treated as Pre-1981 Act Projects under Section 16(c) of the Act. Section 16(c)(1), which applies to pre-1981 Act projects, restricts occupancy by families that are other than very low-income to 25% of overall occupancy. Thus, Project Owners of projects converting to PBRA may admit applicants with incomes up to the low-income limit. HUD Headquarters tracks the 25% restriction on a nationwide basis. Project Owners of projects converting to PBRA do not need to request an exception to admit low-income families. In order to implement this provision, HUD is specifying alternative requirements for section 16(c)(2) of the Act and 24 CFR § 5.653(d)(2) to require Project Owners of projects converting to PBRA to adhere to the requirements of section 16(c)(1) of the Act and 24 CFR § 5.653(d)(1).
- 9. Owner-Adopted Preferences.** Covered Projects are not permitted to establish or, where previously approved under public housing rules, maintain a designation (i.e., a set-aside of units) for elderly families or for disabled families; unlike the statute governing public housing, the Section 8 statute does not authorize designations. However, owners of Covered Projects may adopt a selection preference (e.g., for elderly individuals and/or elderly families) which permits those applicants to be selected from the waiting list and housed before other eligible families. Project Owners who wish to adopt a preference for populations that are not identified in 24 CFR § 5.655(c)(5) (e.g., elderly families, near-elderly single persons, near-elderly families), must obtain HUD approval from the prospective Multifamily Housing Account Executive (field office) prior to execution of the HAP contract to do so in accordance with Notice H 2013-21 (July 25, 2013). This approval must be secured prior to conversion if the owner intends to implement the preference for new admissions immediately following conversion.
- 10. Initial Certifications and Tenant Rent Calculations.** Owners are to use the resident's pre-existing public housing 50058 data and maintain the tenant rent and utility allowance until the resident's next annual or interim certification. To effectuate this provision, HUD is waiving 24 CFR 5.601

Non- Smoking Policies

In accordance with the Smoke-Free Public Housing Final Rule, RRHA amended its PHA Plan and ACOP to ensure compliance. As stated in Notice PIH 2017-03, RRHA will “....design and implement a policy barring the use of prohibited tobacco products in all public housing living units, interior common areas and outdoor areas within 25 feet from public housing and administrative office buildings (collectively, “restricted areas”) by July 30, 2018”.

RRHA has implemented a Smoke Free Policy in full compliance with the requirements. Specifically, the policy prohibits lit tobacco products in all public housing units, indoor common areas in public housing, and in PHA administrative office buildings (in brief, a smoke-free policy for all public housing indoor areas). The smoke-free policy extends to all outdoor areas up to 25 feet from the housing and administrative office buildings. HUD proposes implementation of smoke-free public housing to improve indoor air quality in the housing, benefit the health of public housing residents and PHA staff, reduce the risk of catastrophic fires, and lower overall maintenance costs.

RRHA has reviewed HUD materials, websites, toolkits and all other available resources to determine the steps necessary for compliance. RRHA has offered the Freedom from Smoking Cessation Clinics (offered by the American Lung Association), to all employees and public housing residents and will continue to educate and engage its residents, employees, Board members, stakeholders and partners on the rule. Finally, all residents have signed a lease addendum outlining policy implementation and enforcement. RRHA will continue to partner with local and state health departments and tobacco control organizations.

Project-Based Vouchers

This section describes the projected number of project-based units and general locations and how project basing would be consistent with RRHA's PHA Plan.

When funding becomes available, RRHA plans to use some of its vouchers under the "Project Based Vouchers" ("PBV") option, as described at 24 CFR Part 983. This may be done in one of three ways:

- First, RRHA may issue a Request for Proposals from owners wishing to participate in the program. The criteria and procedures for such selections will be described in the RFP and in the RRHA's HCVP (Section 8) Administrative Plan.
- Second, RRHA may make non-competitive selections of owners whose projects included a competitive selection of proposals, such as housing assisted under a federal, state, or local government housing assistance, community development, or supportive services program.
- Thirdly, RRHA may use its authority under HOTMA to attach PBVs without a competitive process in projects where it has ownership interest and is engaged in an initiative to improve, develop, or replace a public housing property or site. RRHA will detail within its Administrative Plan what work it plans to do on the property or sites, the location and number of PBV units and the HUD regulations and RRHA policies related to the PBV program.

RRHA may also submit a proposal under an RFP for units in its public housing portfolio or a property it may acquire under its "redevelopment" authority for this purpose. The use of PBVs is consistent with the overall PHA Plan encourages the development of affordable, mixed-use, mixed-income housing particularly in consort with broader neighborhood revitalization efforts such as the Creighton Court, Dove Court, Gilpin Court, and Mosby South.

RRHA's PBV criteria and procedures will propose the use of these resources in ways that facilitate achievement of its overall housing goals in general and the mobilization of potential relocation resources in particular, and to address the housing needs of RRHA families at developments slated to be redeveloped, including, but not limited to, the Creighton and Whitcomb Projects and other similar situations.

Under the HUD Asset Management Model, some of RRHA's developments are not financially sustainable because insufficient Annual Contract Contribution (ACC) subsidy is received from HUD to support their operations. RRHA is currently evaluating options for restructuring the properties; possibly seeking to convert these properties to Project-based Section 8 communities.

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants)

As funds become available, RRHA intends to explore all opportunities for additional capital fund monies. RRHA successfully applied for the 2014 and 2015 Emergency Safety and Security Grant and received an additional \$404,000 in funds to make lighting and/or security improvements in all of its large family developments. RRHA will continue to seek additional revenue sources and utilize available programs to address the severe capital needs within its aging housing stock and preserve affordable housing that is decent, safe and sanitary.

B.3 Civil Rights Certification

Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.

See attached

B.5 – Progress Report

Progress in Meeting Mission and Goals in the previous 5-Year and Annual Plan

RRHA continues to work toward goals established in its strategic plan and will continue to revise them to incorporate newly developed missions and goals aimed at transforming its public housing and improving the efficiency of its operations.

RRHA's mission is to be the catalyst for quality affordable housing and community revitalization.

THE TRANSFORMATION OF LARGE PUBLIC HOUSING DEVELOPMENTS.

A. Adopt prioritization criteria and form a realistic, achievable, resourced, inclusive of resident input, plan.

- Completed Density Study for Creighton, Gilpin, Hillside, Fairfield, Mosby and Whitcomb Courts.
- Completed Development Phasing Strategy for Creighton, Gilpin, Hillside, Fairfield, Mosby, and Whitcomb Courts.
- Advertised Request for Proposal for a Physical Need Assessment (PNA) tool, for assessment of developments and long term strategic planning.
- Demolished Armstrong High School and constructed and leased first three phases (175 multi-family units) as part of RRHA's Build First strategy for Creighton Court. Final phase forty-five (45) Senior multi-family units are under construction. Predevelopment work of the 36 homeownership phase has started. Advertised RFP for development partner for Mosby Court Phase 1
- Completed Section 18 applications for demolition and disposition for Creighton Court,.
- Engaged Creighton Court residents and community stakeholder and completed Creighton Court Master Plan.
- Submitted Community Unit Plan to City of Richmond for Transformation Plan approval
- Submitted infrastructure budget for City of Richmond Community Improvement Plan funding.
- Engage residents/stakeholders in the redevelopment process Complete Bill of Rights with Creighton Court Tenant Council as the document to implement transformation plans.
- Conducted community charrette process to Engaged Creighton Court residents and and community stakeholders to create Master Plan
- Established quarterly meetings with resident families and stakeholder of Creighton Court.
- Created FAQs and Project Fact, project newsletter and website for Creighton Court to create transparency and project information.
- Created template engagement strategy to be utilized for other developments.

B. Engage residents/stakeholders in the redevelopment process by direct involvement in task force meetings, community meetings, quarterly newsletters, project specific website and community walks

- Implement resident engagement process at Creighton Court with strategic partnerships.

- Quarterly review of resident engagement process and assess engagement process.
- Proactively utilize project FAQs and Project Fact Sheets developed for RAD (Afton, Bainbridge, Fulton, Randolph, Stovall, 4th Avenue, 700 Lombardy, Old Brook, Decatur, Fox Manor, Stonewall) and Creighton Court to create transparent answers.

C. Utilize Big 6 Density Study Master Plan for each transformation project.

- Utilize draft Density Study Master Plan and Developments Phasing Strategy to analyze each of the current development's assets.
- Review annually.

2. USE OUR EXISTING RESOURCES STRATEGICALLY AND EXPLORE ALTERNATE REVENUE SOURCES FOR VARIOUS PROJECT INITIATIVES.

- A.** Utilized HUD, local, and state funding/programs for project initiatives including but not limited to RAD and RAD Blend, Section 18, Low Income Housing Tax Credits, Virginia Housing REACH funds, Capital Funds, HOME, Community Develop Block Grant, state and Federal Housing Trust Fund. State and Federal Historic Tax Credits for RRHA's RAD project which include Afton, Bainbridge, Fulton, Randolph, Stovall, 4th Avenue, 700 Lombardy, Old Brook, Decatur Fox Manor, Stonewall) and Armstrong Renaissance, Creighton Court Highland Park Senior, The Rosa and Baker School.

Received HUD Section 18 approval to dispose of scattered sites developments. Auctioned forty-eight (48) generating program income for future affordable housing development.

Close the HOPE VI Project

- B.** Dispose/redevelop under-utilized assets to create reserves.
- Contracted with non-profit development partners Richmond Metropolitan Habitat for Humanity and Project Homes to complete disposition of seventy-eight single-family houses for affordable homeownership. Thirty-five houses sold to date as part of RRHA's Neighborhood Homeownership Initiative (NHI) project.
 - Completed disposition of nineteen (19) out of twenty (20) remaining Greenwalk houses. Houses were sold to families earning less than 80% of the Richmond Metropolitan Statistical Area Median Income.
 - Advertised a Request for Proposal (RFP) for RRHA's Blackwell Homeownership project to create affordable and market rate homeownership opportunities. Evaluated RRHA's inventory of non-federal properties to implement RRHA's build first strategy for resident families to continue to provide affordable housing options.
- C.** Determine best practices for revenue generation.
- Explore the creation of a private management firm and/or fee for services.
 - Explore opportunities for outside management of all Public Housing Authority complexes and projects.
 - Market Tax Exempt Bond Program.
- D.** Institutionalize resource development function
- Create an annual campaign plan.

- Engagement with contract grant writers which included LRK for Choice Neighborhood. Engaged contract grant writers for ROSS and Jobs plus. RRHA was successful in receiving the ROSS.

E. Act as a co-developer or self-developer for RRHA development projects to earn fees and gain experience.

- Contracted with Financial Consulting firm to develop staff capacity to self-develop RRHA projects.
- Identified targeted projects for self-development opportunities.

3. SUPPORT OUR CUSTOMERS' SUCCESS

A. Examine and redesign the Resident Services Programs and establish metrics that will promote sustainability among our residents.

In Progress: The RS department has enhanced its program structure with the implementation of a new resident focused case management system (TAAG) that also serves as a comprehensive documentation, assessment, and data collection tool.

Residents are currently being assessed to evaluate self-sufficiency indicators in areas of self-sufficiency from which metrics can be established.

- **Implement an enhanced structure of the resident services program.**

Completed- Phase 1 of the implementation of TAAG is complete, which has provided and enhanced the structure by which residents are receiving services.

- **Survey and audit current programs to ensure that they improve quality of life and promote Self-sufficiency.**

Implementing/Ongoing – The new case management model is being implemented and is supported by the new case management system which automates and aligns with best practices for resident outreach, assessment of needs, self-sufficiency planning, service coordination, and progress tracking.

- **Train staff on TAAG case management system.**

Complete: All Resident Services Staff have been trained on how to use TAAG. Initial training dates were 10/19-10/21. Training will be ongoing as processes are refined and systems update.

B. Create a plan to meet resident needs.

Implementing/Ongoing – Currently identifying residents needs through assessment (LIFTS – Leading Individuals and Families Towards Self Sufficiency) and using best practices to develop realistic and attainable service plans for the residents.

- **Raise funds to increase resident services staffing to an optimal case management portfolio of 100 residents per staff member.**

Ongoing – Recently awarded the Resident Opportunities and Self Sufficiency (ROSS) and Family Self Sufficiency (FSS) program grants. The grant funds will provide the case management support to expand self-sufficiency coordination services for more residents. Other funds have also been acquired. Resident services will continue to seek and secure funds and commitments from funders and partners to maintain an effective program.

Ongoing:

Grant Awarded: Resident Opportunities and Self-Sufficiency (ROSS) grant awarded which allowed for 3 added staff positions to assist residents in becoming self-sufficient.

- Applied for the Affordable Housing Trust Grant – we did not secure.
- Applied for the JOBS plus Grant – we did not secure.
- Funding – executed contract with Michaels to provide service coordination services, which allows for an additional part-time position.
-

- **Revise the resident needs assessment.**

Completed: Staff is currently conducting a comprehensive LIFTS (Leading Individuals and Families towards Self-Sufficiency) Assessment to identify Resident's needs in the areas of employment, job training, education, transportation, childcare, health, housing, finances, legal, and homeownership.

- Create a Plan to meet Residents' Needs: As residents are assessed, RSC's are working with the family to develop individualized self-sufficiency plans.

- **Examine the supervision structure of the resident services program.**

Completed: The new supervision structure integrates 3 Program Manager positions that allow direct supervision, training, collaboration, and coaching to Resident Service Coordinators. Additional re-organization may take place as the agency continues to evolve, communities are re-developed, and the residents' needs change.

- **Develop an Individual Service Plan for all new, able-bodied residents that targets the top 2 Priorities**

Implementing/In Progress – Service plan development is part of the case management process - Staff will continue to be trained on how to develop effective plans as families continue to be assessed.

C. **Examine the needs and available services for residents under 18 years of age and develop partnerships and programs to support them.**

In Progress: Resident Services continues to work to improve the access to needed resources for youth. However, employment opportunities for youth continue to be remote and inaccessible to many of the youth living within our communities. We have also experienced inadequate staffing for after school programming.

Current Partnerships and Programming to Support Youth:

VCU – Healthy Communities for Youth
Code VA, Apple, and Verizon – STEM Lab
Parks and Recreation – After School Programs and Sports
Mayor's Youth Academy – Summer Employment and Leadership
Tomorrow's Promise Scholarship – College funding
RRHA Youth Employment and Leadership Academy
Boys and Girls Club of Metro Richmond – After school programs

- **Conduct an asset inventory for each public housing property.**

In Progress: Currently partnering with VCU Healthy Communities to deliver assets mapping within the community.

- **Develop a program and partnership plan for each public housing property.**

In Progress – Resident Services is currently working with Parks and Recreation to develop scalable youth programs within the big 6 communities. The RRHA's Tomorrow's Promise Scholarship fund provided scholarships to 15 students last year and applications are currently being accepted for 2021.

D. Create a plan to organize residents in order to promote participation in resident services.

In Progress – The plan to organize residents has been affected by COVID-19. Residents have been offered opportunities to get involved via virtual platforms:

- GED information sessions
- Financial Literacy Workshops
- COVID specific financial navigations sessions

- **Re-engage the Resident Councils.**

In Progress – The Tenant Council engagement efforts have resumed after being delayed due to COVID-19. Tenant councils have been conducted and Officers are currently receiving Leadership training .

- **Develop a resident engagement plan.**

In Progress – The new Case Management system automates best practices for strategic outreach efforts based on the needs of the community.

- **Deploy the resident engagement plan and develop success metrics.**

In Progress – The new Case Management system automates best practices for strategic outreach efforts based on the needs of the community. The Resident Engagement plan is being developed.

E. Develop Self Sufficiency for Housing Choice Voucher and Public Housing Participants

In Progress: In order to effectively support motivated families through the process of becoming self-sufficient, the following self-sufficiency indicators are being tracked: The number of participants who obtain GED or High School diploma (goal-15%) or industry specific certifications, college degrees or higher (goal -20%); the number of participants obtaining transportation (goal-15%), or participants obtaining gainful and suitable employment (20%).

- **Train Resident Service Coordinators in the FSS Program**

Completed/Ongoing: Two RSC's received FSS certification through Nan McKay and Associates. We intend to enroll 3-5 new RSC's at next season's FSS training.

- **Fill Mandated FSS program slots – only required for HCVP FSS program**

The current count of FSS enrollments has substantially exceeded the mandatory minimum, see chart below:

Program	Mandatory Slots	Enrolled	Percentage of Mandatory Slots
HCVP	23	36 (Yardi)	105%
LIPH	Not applicable	39 (Yardi)	Not applicable
Total	22	92	418%

Current projects to increase achievability of a larger-scale and effective FSS program, accessible to more residents include:

- Motivational Screening of residents
- Effective Case management modeling
- Escrow Audit and Reconciliation of FSS Accounts
- Audit complete through February 2021. – Accounts are reconciled monthly
- Additional FSS Coordinator positions and FSS Training
-

RSC's are performing FSS functions to include service coordination for FSS families living within their assigned community.

- **Implement the Section 8 Homeownership Program**

In Progress - In collaboration with the Housing Choice Voucher Program, the initial planning and draft modeling for the operation of the Homeownership Program in connection with the FSS program has taken place.

F. Increase safety for all RRHA communities

- Continue to develop fluid comprehensive strategies addressing public safety issues by leveraging RRHA resources with other like-minded Federal, State, and City stakeholders. This will continue to primarily be accomplished through the interagency RRHA Prevention/Intervention Steering Committee.
- Evaluate technology and environmental enhancements that can be utilized to improve safety such as adding to the existing 310 security cameras, planned license plate readers in partnership with the Richmond Police Department and Virginia State Police, continuous tree trimming and architectural improvements.
- Continue to partner with Federal, State, and City Law Enforcement to create effective prevention, intervention, and enforcement strategies.
- Expand current Public Safety Referral program through an Intergovernmental Initiative with RPD and Richmond City Human Services.
- Remain current in crime analysis to identify relevant and focused strategies to address public safety issues. Current priorities include violent crime, domestic violence, juvenile engagement, and emergency relocations.

4. BUILD STRATEGIC PARTNERSHIPS TO ADVANCE OUR WORK.

- A.** Create and sustain successful partnerships with resident councils and neighborhood organizations and service providers.
 - Implement semiannual meetings of our clients' service providers to explore improvements to service delivery and provide programmatic updates. Residents Services staff meet quarterly with service providers to explore and to improve services delivery. Resident Services coordinate events and workshops along with Service Providers that help to enhance the lives of our residents.
 - Increase participation in professional and trade groups representing rental property owners and service providers. The Housing Choice Voucher Program has engaged with and participated in several professional settings to advance and increase property owner participation. Meetings were held with Virginia Apartment Management Association (VAMA), Several individual landlords,

Connect Capital to create the Voucher Playbook, Cocktail reception with Housing Opportunities Made Equal, and Landlord engagement seminars with Homeward.

- Increase resident attendance at resident council meetings to promote programs, services, and benefits, particularly FSS. The FSS Program Coordinating Committee (PCC) meets quarterly to discuss resources in the community to leverage partnerships and create pathways that align with the needs of the FSS participant family. Meetings have been held within a virtual platform due to the COVID-19 pandemic. We are continuing to re-evaluate several means of facilitation to maintain effectiveness and engagement.
 - Create an internal team to ensure representation at key civic association and City Councilmember meetings that will gather information and advise on issues.
- B.** Expand relationships with new non-profit Community Development Corporations and private developers in transforming communities.
- Advertised Request for Proposals to contract with CDC's and private developers' for RRHA's redevelopment efforts.
 - Contracted with The Community Builder (TCB) and Master Developer for Creighton Court.
 - Contracted with non-profit development partners Richmond Metropolitan Habitat for Humanity and Project Homes to complete disposition of seventy-eight single-family houses for affordable homeownership. Thirty-five houses sold to date as part of RRHA's Neighborhood Homeownership Initiative (NHI) project.
 - Contracted with development partner Enterprise Community Development Corporation (ECD) to develop RAD Fay Towers project to three (3) off-site location: Highland Park Senior, The Rosa and Baker School Senior Apartments.
- C.** Engage our public leaders (i.e. local, state, and federal elected officials) to accomplish our work and identify areas of common interest. In progress
- Increase meetings and relationship-building with City Council to identify areas of interest and strategic priorities. We continue to engage City council on redevelopment issues (i.e. Creighton, RAD projects, North Jackson Ward) and have ongoing discussions to increase our Resident Services' capacity to provide programs for our youth. We will continue to build on maintaining an open relationship with council.
 - Increase meetings and relationship-building with Senators to identify areas of interest and strategic priorities RRHA provides updates to Senator Jennifer McClellan on Creighton Court Redevelopment/Revitalization and resident engagement. We will continue to develop strategies to engage strategies.
 - Increase meetings and relationship-building with Congressional representatives to identify areas of interest and strategic priorities. RRHA will develop this strategy.
 - Increase meetings and relationship-building with philanthropic partners to identify areas of interest and strategic priorities. RRHA will develop this strategy.
- D.** Identify and engage stakeholders in our future communities.
- Implemented community engagement plan for the East End, Creighton, Armstrong.
 - Jackson Ward and North Jackson Ward including community meetings, one-on-one assessments, newsletter distribution, website creation of project and meeting with Development Tenant Councils..

- Collaborate with Master Developer, Better Housing Coalition for Highland Park to implement the community engagement plan for the community.
- E. Build relationships with media to share our successes.**
 - Develop a communications plan reflecting our strategic priorities. RRHA's Communications and Public Relations Office created a comprehensive communications plan on October 26, 2020 and is an ongoing, working plan. Adjustments are made as necessary concerning outreach efforts and the introduction of new technology.
 - Find resources to expand our brand impact. Planned- RRHA's Communications and Public Relations office is currently investigating several ways to generate resources to include, but not limited to charging outside organizations to place inserts in our rental statements, RRHA masquerade ball fundraiser, Create an RRHA blog, RRHA history book.
 - Invest in media training for key staff in the organization and develop subject matter experts. Planned for FY 2022
 - Create proactive positive stories. In process and ongoing - RRHA's Communications and Public Relations office takes every opportunity to create public stories about RRHA families who have achieved success in their lives. Several of these are currently featured on RRHA's website. In addition, these stories are posted on RRHA's social media platforms and are also included in the quarterly RRHA VIBE Resident Newsletter.
- F. Improve customer service relationships with all stakeholders.**
 - Review and implement improvements to current customer contact systems (telephones, website, email, social media, and databases). Call Center, HCVP, LIPH, IT, (In process and ongoing. RRHA's Communications and Public Relations office manages and updates the Agency's website and social media platforms on an ongoing basis.
 - Develop a customer service escalation plan. (RRHA's Communications and Public Relations office is working with HCVP and LIPH to develop this plan to ensure that RRHA related customer inquiries and complaints are handled in a consistent and positive way)
 - Measure customer service satisfaction and develop a plan for improvement and advancement. Call Center, HCVP, LIPH (RRHA's Communications and Public Relations office has conducted a Resident Communications survey to assess where the challenge areas are with respect to how the Agency communicates. These findings are currently being used to develop methods and platforms to enhance communications with RRHA families)

5. CONDUCT AN INNOVATIVE AND COLLABORATIVE WORK/ORGANIZATIONAL CULTURE.

- A. Increase Board knowledge and engagement.**
 - Completed – In 2020 Quadel through HUD Technical Assistance developed a three modules specific RRHA training to accompany HUD training for Commissioners on-boarding that was delivered in 2021; an all-day RRHA Specific Orientation for new and existing commissioners was presented in 2020; as well as a six hour Real Estate retreat in 2021.
 - Ongoing – Commissioners are encouraged to participate in HUD, NAHRO and PHADA training at their request and in 2021, the Governance Committee Chair will be training on Roberts Rules of Order.
 - Identify 12 key areas of financial and operational literacy and provide 10-15 minute trainings at Board meeting to increase financial awareness and understanding among Board members. Ask the Board for input on prioritization.
 - Appoint one Board designee to attend each industry training.
 - Require mandatory completion of HUD board training for all existing and future Board members.

B. Develop a robust talent management plan to execute the strategic plan.

- Stabilize Human Resources operations. Completed – An Exhaustive 3rd Party Assessment of the HR Department and an HR Director was hired in 2017 and a Human Resources Generalist in 2019. In 2017 RRHA issued an RFP to obtain a new fully integrated HRIS system. ADP was selected and configuration of their Workforce Now product for RRHA began in 2018. The two members of the HR team were retained to ensure a successful transition to a new HR IT platform. In 2020 all members became certified HR professionals with the Director having both the SHRM and HRCI Senior level certifications and the Senior Administrator obtaining the PHR and the HR Generalist obtaining the CP.
- Update the current performance management system. In process – In 2018, the Probationary Hire Process was revised to include additional reviews throughout the review period. In 2020, configuration for a performance management tool through ADP began however it was determined the current functionality of the ADP process was cumbersome and not user friendly so a simplified process was developed and being rolled out in 2021.
- Develop professional development plans for business units and individual employees. Each Business Unit developed plans for their teams through the annual budget process; with examples of prior years' goals including:
 - 2019 Maintenance Supervision Certifications program offer to Maintenance supervisors.
 - Obtaining IREM/ARM Certification for Property Managers
 - Obtaining SHRM and HRCI Certifications for
 - Program Specific training for Accountants based on the RRHA programs they support.
 - 2020 HTVN Learning Management System containing industry and functional area training as well as industry certifications and was reintroduced for all employees and will be leveraged for employee development.
 - Compliance training such as safety
- RRHA is currently working with VCU to develop training for new managers as well a cohort development group for high potential and executive level leaders.
- Develop recruitment, retention, and succession plans for all business units.
 - Through the budget process recruitment and retention plans are developed.
 - 2019 - A human capital plan was created for the employees of the small family and senior communities impacted by RAD in 2019.
 - 2020 - the framework for a succession plan was developed and introduced and will be fully implemented in 2021.
- Incorporate the strategic plan into employee annual work plans.
- Explore iEmployee options for employee communication. Effective March 2019, RRHA has adopted the ADP Workforce Now Time and Attendance System. - Human Resources Department began implementing the full ADP Workforce Now Product, the included payroll processing, time and attendance management, internal and external recruitment sites, virtual personnel files through document storage, employee self-service, home page for communication vital information to employees, payment of garnishments and liens by ADP, employee discounts, benefits administration, and the addition of a Mobile App.
- Revive employee communications mechanism. 2017 Weekly Employee Newsletter was developed which has been replaced with a monthly communication, RRHA Employee Vibe.

- C.** Build a customer- service culture that thrives on transparency, inclusivity, trust, and excellence to achieve success.
 - Develop and implement an agency-wide customer service plan to improve skills.
- D.** Create an internal Yardi Expert Bank.
 - Revive task force by identifying new department leads and training them accordingly.
 - Identify a key employee responsible for ongoing Yardi knowledge and maintenance and train them accordingly.
 - Develop a strategy for all new employee training.
 - Develop a strategy for existing employee training.
 - Develop a strategy for ongoing education for new system features.
- E.** RRHA is currently and will continue to undertake strategies to re-imagine its business model, create automated procedures, and streamline processes. These efforts have included the implementation of the following:
 - Transitioned RRHA’s network infrastructure to a hybrid model. We have reduced the number of servers on premise from over 50 to only 4. The remaining servers were decommissioned or moved to our private Cloud.
 - Distributed over 100 laptops to staff so they could work virtually during the pandemic.
 - Rent Café - The ability to conduct virtual annual and interim recertifications, submit maintenance requests, check ledgers, inspection schedules and results, make rent payments and check application statuses.
 - DocuSign – Secure method to sign and route documents electronically.
 - Call Center – Staff persons available to answer questions related to all customer inquiries.
 - Text Messaging (coming soon) - the ability to send corporate-wide text messages, property specific text messages and individual text messages to residents, applicants, landlords and employees.
 - Document Management System (coming soon) – system used to receive, track, manage and store documents and reduce paper.
 - Kiosks (coming soon) – Self-serving and free-standing unit ideal for resident and applicant services. The kiosk will house RRHA’s website, applicant, resident and landlord portals, resident service options, and social service agencies for the use of completing annual recertifications.
 - Vendor Café (coming soon) – A portal utilized by RRHA vendors in an effort to streamline the purchase order process.
 - Utility Assistance Payment Card – A Visa debit card issued to resident to aid in utility reimbursement payments that will replace check issuances.

6. MEASURE AGENCY SUCCESS.

- A.** Develop measurements to gauge success in all departments in order to create a High Performing culture.
 - Revise former key performance indicators for each department to achieve a High Performing scorecard.
 - Measure key performance indicators monthly and communicate results to the staff and Board.

- Set annual goals for key performance indicator improvements.
- B.** Develop a plan with annual benchmarks to achieve HUD designation Move to Work accreditation by 2024.
 - Identify strengths and weaknesses and develop an annual plan to improve PHAS score.
 - Identify strengths and weaknesses and develop an annual plan to improve SEMAP score. RRHA has implemented effective Quality Control processes that have resulted in Self-Certification as a High Performing agency for the last three reporting periods.
 - Identify strengths and weaknesses and develop an annual plan to improve redevelopment/capital fund score.

With the exception of SEMAP, RRHA will evaluate and develop an implementation plan to address.

7. DEVELOP A COMPREHENSIVE COMMUNICATIONS AND MARKETING PLAN

- A.** Expand four focus areas: Finance and Administration; Products and Services; Clients and Stakeholders; and Employees. RRHA's Communications and PR Office created a comprehensive communications plan on October 26, 2020 and is an ongoing, working plan. This means that adjustments are made as necessary concerning outreach efforts and the introduction of new technology.
- B.** Develop measurable SMART goals for qualitative measuring performance. RRHA Communications and Public Relations Office conducted a Resident Communications Survey in November 2020 and are utilizing the results to improve and enhance our communications efforts and outreach to RRHA families.
- C.** Perform Social Media situational analysis. Complete and ongoing
- D.** Identify market Segmentation. Ongoing. RRHA's Communications and PR Office are looking at various way to reach out to various audiences, partners and stakeholders of RRHA such as RRHA families, HCVP families, landlords, city departments, civic associations, faith community, to name a few.
- E.** Develop and implement psychographic analysis. RRHA's Communications and PR Office currently uses geo-fencing to target specific communities within our service area. These include RRHA families, partners, and stakeholders.
- F.** Engage meaningful and relevant subject matter of the RRHA initiatives. Ongoing
- G.** Develop targeted communication channels. Complete and ongoing. RRHA's Communications and PR Office utilizes a variety of target communications channels. These include a vibrant, user friendly website and the following social media platforms – Facebook, Twitter, LinkedIn and Instagram
- H.** Develop pre-scripted draft press releases for major upcoming events/announcements/incidents by department. Ongoing

B.6 Resident Advisory Board (RAB) Comments

See attached

B.7 Certification by State and Local Officials

Form HUD 50077 – SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.

See attached

C.1 Capital Improvements

See HUD Form -50075.2 (attached)

Plan approved 05/17/2019.

Civil Rights Certification

See HUD Form 50077-CR attached