

Richmond Redevelopment & Housing Authority

DRAFT

Annual Agency Plan

for

Fiscal Year 2026

October 1, 2025 – September 30, 2026



DRAFT

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NOTE: All Exhibits, Attachments, and any other document or record referenced in this Plan are incorporated into this Plan as if fully set forth herein.

Introduction

The Quality Housing and Work Responsibility Act of 1998 (“QHWRA”) requires all federally funded public housing authorities (“PHAs”) to submit a Public Housing Authority Plan to the United States Department of Housing and Urban Development (“HUD”). This plan, which PHAs submit annually, reflects the PHA’s policies, rules, and requirements concerning the PHA’s operations, programs, and services, including any changes to these policies.

This document (the “Plan”) represents the final draft plan for the Richmond Redevelopment & Housing Authority (“RRHA”) for the authority’s 2025-2026 fiscal year. This Plan covers the period of October 1, 2025 through September 30, 2026.

This Plan is made available to the public for at least 45 days for a review and comment period. An electronic copy of the Plan is available on RRHA’s website (www.rrha.com); hard copies of this Plan are available at the locations specified on **Exhibit A**, attached to this Plan.

Anyone who needs this Plan in alternate formats, including languages other than English, should contact Calandra Trotter, 504 Coordinator, by phone at (804) 780-4276 or by email at compliance@rrha.com for further information and assistance.

This Plan will be submitted to HUD on or before July 16, 2025.

Once approved, the final approved Plan will be available on RRHA’s website (www.rrha.com).

NOTE: All Exhibits, Attachments, and any other document or record referenced in this Plan are incorporated into this Plan as if fully set forth herein.

About RRHA

Founded in 1940, RRHA is the PHA responsible for administering HUD's Low-income Public Housing ("LIPH"), Housing Choice Voucher ("HCV"), Project-based Voucher ("PBV"), and redevelopment programs within the City of Richmond.

RRHA is governed by a nine-member Board of Commissioners appointed by the Richmond City Council. This Board is responsible for determining RRHA policy, approving RRHA's annual budget, and approving this Plan prior to its submission to HUD. The Board elects a Chair and Vice Chair from among its members and hires RRHA's Chief Executive Officer to oversee the agency's activities and operations.

RRHA's mission is to build vibrant communities and provide decent, safe, and sanitary affordable housing throughout the City of Richmond. The agency operates under the core values of iACT:

- Integrity
- Accountability
- Customer Focus
- Teamwork

Fair Housing, Nondiscrimination, and Accessibility

RRHA provides housing and employment opportunities for all persons without regard to an applicant's, resident's, or employee's race, color, religion, national origin, sex, elderliness, familial status, disability, source of funds, sexual orientation, gender identity, or military status in the admission to, access to or operation of programs, services, or activities.

RRHA complies with all relevant law, including but not limited to Title VI of the Civil Rights Act, the Americans with Disabilities Act, and the Virginia Fair Housing Act.

Qualified individuals who need a reasonable accommodation to access and participate in RRHA programs or services are encouraged to make their needs known by completing a Reasonable Accommodation Request form online at www.rrha.com or may contact Calandra Trotter, 504 Coordinator by phone at (804) 780-4276 or by email at [c](mailto:c.trotter@rrha.com) for further information and assistance.

Anyone who feels that RRHA has discriminated against them has the right to request an internal grievance with RRHA and/or to file a complaint with HUD's Office of Fair Housing and Equal Opportunity by calling toll free 800-669-9777.

Resident Advisory Board

RRHA's Resident Advisory Board ("RAB") is composed of the Richmond Tenants Organization, a jurisdiction-wide resident council in accordance with 24 C.F.R. § 903.13, and representatives that receive tenant-based assistance through RRHA's Housing Choice Voucher (HCV) program.

The RAB's major responsibility is to assist RRHA in preparing this Plan, to provide comments on this Plan, and to advocate for families who receive housing assistance from RRHA. The RAB has reviewed this Plan, received an overview of RRHA's programs and policies, and has been afforded the opportunity to provide comments. All RAB's comments on this Plan are attached hereto as **Exhibit C.1**.

RRHA Annual Plan for Fiscal Year 2024-2025

A. PHA Information

PHA Name: Richmond Redevelopment & Housing Authority

PHA Code: VA 007

PHA Type: ☒ Standard PHA

Troubled PHA

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2024

PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning):

Number of Public Housing (PH) Units: 3,246

Number of Housing Choice Vouchers (HCVs): 4,424

Total Combined Units/Vouchers: 7,670

PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission

Availability of Information: PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project ("AMP") and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plan.

A detailed list of locations where a copy of this Plan is available for public inspection is attached to this Plan as **Exhibit A**.

B. Plan Elements

B.1: Revision of Existing PHA Plan Elements

(a) Have the following PHA Plan elements been revised by the PHA?

Revision		Plan Elements
Y	N	
x		Statement of Housing Needs and Strategy for Addressing Housing Needs
x		Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions
x		Financial Resources
x		Rent Determination
x		Operation and Management
	x	Grievance Procedures
x		Homeownership Programs
x		Community Service and Self-Sufficiency Programs
x		Safety and Crime Prevention
	x	Pet Policy
	x	Asset Management
	x	Substantial Deviation
	x	Significant Amendment/Modification

(b) If the PHA answered “yes” for any element, describe the revisions for each revised element:

Statement of Housing Needs and Strategy for Addressing Housing Needs

Like many places in the United States, Richmond, Virginia needs to increase its supply of available housing, particularly for persons and families whose income is at or below 80% of the Area Median Income (“AMI”). The need for quality, affordable housing inversely correlates to income; in other words, the lower a family’s income the more competition they face for housing.

RRHA identifies the housing needs of the low-income, very-low income and extremely low-income families who reside in RRHA’s jurisdiction, namely, the City of Richmond. RRHA determines housing needs based on analyses of RRHA’s waiting lists, information provided by the City of Richmond, and demographic data from the United States Census Bureau’s most recent and available American Community Survey.

RRHA’s waiting lists for public housing and HCVs all demonstrate that most families self-report that their income is at or below 30% AMI and that they need a 1- or 2-bedroom home. For additional information about RRHA’s waiting lists, please see **Exhibit B.1-1**, attached to this Plan.

According to the Census Bureau, Richmond has approximately 19,500 households categorized as Extremely Low Income (at or below 30% AMI). Nearly 12,000 families are Very Low Income (between 30% and 50% AMI) and an additional 15,295 report being Low Income (between 50% and 80% AMI).

RRHA's strategies to address the housing needs of these families include:

- 1) **Maximizing the number of available affordable housing units** by:
 - a. Addressing needed capital projects in existing public housing units while also moving forward with repositioning strategies to ensure new affordable units are developed.
 - b. Employing effective management practices and policies to minimize offline public housing units with an occupancy goal of 96%.
 - c. Maintaining at least 95% lease-up rate or utilizing 100% budget authority for RRHA's HCV program by establishing effective payment standards, occupancy standards, and manageable practices.
 - d. Applying for additional voucher subsidy and any available special program vouchers or other grant funding to serve more families.
- 2) **Ensuring housing remains affordable** by adopting appropriate payment standards and thoroughly reviewing landlord requests for contract rent increases.
- 3) **Creating greater awareness of housing opportunities** by publicizing and marketing agency programs and resources. RRHA plans to provide marketing information to local social service agencies, advocacy groups, partners, residents, and applicants. RRHA will also publicize housing opportunities through advertisements in local print, broadcast media, social media outlets as well as detailing these opportunities on RRHA's website.
- 4) **Conducting activities to further fair housing**, as further detailed in **Section D.1** of this Plan.

RRHA will undertake these strategies while keeping in mind and considering all identified needs of applicants and residents when planning for redevelopment and new affordable housing communities. This includes, without limitation, analysis and consideration of family size, families with children, and persons with disabilities so that RRHA can continue to ensure the agency's developments can offer a sufficient number of units, range of sizes and bedroom configurations, and accessibility features as indicated by the stated needs of RRHA residents and applicants.

Additional information about RRHA’s waiting lists, which informs RRHA’s planning processes, can be found in **Exhibit B.1-1** and **Exhibit D.1**, attached to this Plan.

Further, RRHA utilizes site-based waiting lists for all Project-based Voucher (“PBV”) communities, with the agency maintaining and administering a waiting list for each PBV community. Based on RRHA’s past experiences, as well as past and current demographic information, this policy is crucial in further desegregating the City of Richmond.

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

RRHA has made updates to policies that govern eligibility, selection and Admissions including changes required by HOTMA. This information for RRHA’s LIPH program is contained in RRHA’s Admissions & Continued Occupancy Policy (“ACOP”). Policies governing RRHA’s HCV program are found in RRHA’s Administrative Plan.

Both documents are submitted along with this Plan and available for public inspection and comment in all locations where this Plan is available, as identified on **Exhibit A**.

A summary of all changes to RRHA’s ACOP and Administrative Plan are attached to this Plan as **Exhibits B.1-2 and B.1-3**, respectively.

Financial Resources

Attached to this Plan, as **Exhibit B.1-4**, is a summary of RRHA’s financial resources. This summary includes, without limitation, operating, capital, and other anticipated federal resources available to RRHA, as well as tenant rents and other income – including non-federal sources of funds – available to support public housing or tenant-based assistance. This summary also provides RRHA’s planned use(s) for each resource.

Rent Determination

RRHA has made updates to policies related to rent determination related to changes required by HOTMA. This information for RRHA’s LIPH program is contained in RRHA’s Admissions & Continued Occupancy Policy (“ACOP”). Policies governing RRHA’s HCV program are found in RRHA’s Administrative Plan.

Both documents are submitted along with this Plan and available for public inspection and comment in all locations where this Plan is available, as identified on **Exhibit A**.

A summary of all changes to RRHA’s ACOP and Administrative Plan are attached to this Plan as **Exhibits B.1-2 and B.1-3**, respectively.

Operation and Management

This information for RRHA's LIPH program is contained in RRHA's Admissions & Continued Occupancy Policy ("ACOP"). Policies governing RRHA's HCV program are found in RRHA's Administrative Plan.

Both documents are submitted along with this Plan and available for public inspection and comment in all locations where this Plan is available, as identified on **Exhibit A**.

A summary of all changes to RRHA's ACOP and Administrative Plan are attached to this Plan as **Exhibits B.1-2 and B.1-3**, respectively.

Homeownership Programs

RRHA is excited to place a greater focus on homeownership programs. As many Americans know, investing in a home is a primary means to building generational wealth; unfortunately, many Americans have been denied this opportunity for too long.

Specifically, RRHA administers, has applied for, or plans to apply for the following programs:

HOPE VI:

Blackwell, Swansboro, Fulton, Citywide Homeownership; Project No. VA36URD007I197

Application approved March 29, 2002; 212 units.

Given the scarcity of available vacant land in Richmond, RRHA proposes to utilize the remaining lots of the Blackwell HOPE VI project for the construction of new homes. There are a total of 111 available lots, which includes any new lots that were the result of existing lots being "split". Of the 111 lots, RRHA is participating in a collaboration with the Maggie Walker Community Land Trust (MWCLT) for 36 lots on which new single-family homes will be built for homeownership purposes. As currently proposed, 5 of these 36 homes and underlying land will be sold to qualifying buyers earning up to 115% of Area Median Income (AMI) and the remaining 31 homes in this phase will be sold through MWCLT's Community Land Trust model to qualifying buyers earning up to 80% AMI. RRHA will utilize the remaining 75 lots in its *MOONSHOT* initiative's homeownership component

Section 32:

Neighborhood Homeownership Initiative ("NHI"); Project No. DDA0002335

Application approved September 25, 2007; 121 units

HUD approved a significant amendment to RRHA's previous plan related to the agency's Section 32 Homeownership program. On November 19, 2015, HUD approved RRHA's request to rescind sixty-six (66) Section 32 units; on April 28, 2017, HUD approved disposition of these units. Since that approval, RRHA has contracted with two local nonprofit organizations to construct or rehabilitate thirty-eight (38) homes and sell them to families whose income is at or below 80% of AMI. The other twenty-eight (28) units were sold at a public auction.

On June 8, 2017, HUD approved RRHA's application to rescind forty-four (44) Section 32 units. HUD then approved disposition of these units on October 11, 2018. RRHA's nonprofit development partners will construct or rehabilitate homes on thirty-six (36) of these lots for families earning 80% or less of AMI. The remaining eight (8) lots were sold at a public auction.

Section 5h:

3208 N Street; Project No. VA 7-30

Application approved July 26, 1999

RRHA plans to dispose of 3208 N Street, Richmond, Virginia.

More information about these homeownership applications is located in **Exhibit B.2-1**, attached to this Plan.

Additionally, RRHA plans to open a comprehensive Home Center to support these homeownership opportunities, as described more fully in Sections B.2 and B.3, below.

"Come Home" Homeownership Program:

On March 5, 2024, RRHA rolled out its "Come Home" Homeownership Program for its Low-Income Public Housing residents and Housing Choice Voucher Program participants and it is particularly attuned to the needs of public housing residents. Qualified public housing residents and voucher participants will be eligible to receive the following unique homeownership benefits, depending on availability in the community lending program sponsored by partner mortgage lending institutions:

- Consideration of consistent on-time rent payment history, rather than credit scores, in qualifying for loans.
- Down payment assistance
- Closing costs assistance
- Below-market interest rates
- Mortgage insurance relief
- Individual Development Account (Match Savings)

- Post-Closing Counseling

Mandatory Housing Counseling & Budgeting

For those residents who require mid-level to intense case management, the homeownership counseling would center around mandatory housing counseling and homeownership budgeting. The homeownership case management team would ensure financial literacy and follow the case resident from intake while building the case file.

U.S. Department of Housing and Urban Development (HUD)-certified housing counseling agencies (“HCAs”) serve a critical role in assisting potential homeowners. As such, RRHA is also partnering with nationally known HOME Free and local subsidiary, Southside Community Development Corporation (SCHDC) and Neighborhood Assistant Corporation Association (NACA), to help families prepare and qualify for Homeownership via mandatory robust housing counseling, and mandatory homeowner education about financial management and budgeting to help them stay in their home and help avoid delinquencies and foreclosure while enrolled in the RRHA family self-sufficiency program.

The Homeownership Program will be supported by a dedicated Homeownership Coordinator who is an employee of RRHA.

This program is designed to substantially increase homeownership for some of Richmond’s low-income families, but with a specific focus on public housing residents. Some of the key ComeHome partnerships include Southside Community Development and Housing Corporation, Bank of America, Truist Bank, Virginia Housing Mortgage, Peoples Advantage National Credit Union, Virginia Credit Union, Virginia Department of Housing and Community Development Mortgage.

For more details about the RRHA HCV component of the ComeHome program, see Chapter 15, Part VII of the agency’s Administrative Plan.

Community Service and Self-Sufficiency Programs

RRHA has been exploring the expansion of the agency’s self-sufficiency programming to increase the number of public housing residents transitioning to unsubsidized housing. Referred to as PATH (Public Assisted Temporary Housing), the agency looks to roll-out a pilot of the program in FY26.

Safety and Crime Prevention

Community Safety and Security

The mission of the Public Safety Department (DPS) at the Richmond Redevelopment and Housing Authority (RRHA) is to ensure a safe and secure environment for residents, staff, and visitors within RRHA communities. DPS is dedicated to preventing crime, maintaining peace, and providing responsive safety measures to protect property and promote a positive living

environment.

RRHA's Department of Public Safety (DPS) is committed to ensuring the safety of all residents and staff within RRHA communities. By focusing on crime reduction, improving security measures, enhancing community engagement, and building strong partnerships, the department aims to create a safer, more supportive environment for everyone involved. These goals will be accomplished through: Crime Reduction; Security Enhancements; Community Engagement and Visibility; Crime Prevention and Awareness; Partnerships and Support Services; and Drug Prevention and Addiction Support.

The following performance measures will be used to track progress and assess the effectiveness of the Public Safety Plan:

- Reduction in reported crime incidents, including major crimes (homicides, robberies, assaults, and burglaries).
- Increased use of the RRHA Tip Line.
- Number of security cameras installed and upgraded in RRHA communities.
- Number of community engagement events, such as neighborhood walks and meetings with property management.
- Number of training sessions conducted for staff and residents on crime prevention and emergency procedures.
- Partnerships established with external organizations focused on crime prevention, rehabilitation, and substance abuse support.

RRHA's Department of Public Safety (DPS) has oversight of security contractor Sentry Force and the firm's Security Officers assigned to RRHA who have "boots on the ground" within all of the BIG 6 communities and Senior Living communities.

To effectively implement this Public Safety Plan, DPS will acquire funding and resources from grants and partnerships.

(c) The PHA must submit its Deconcentration Policy for Field Office review.

B.2: New Activities

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

New		Activity
Y	N	
x		Hope VI or Choice Neighborhoods
x		Mixed Finance Modernization or Development
x		Demolition and/or Disposition
x		Designated Housing for Elderly and/or Disabled Families
x		Conversion of Public Housing to Tenant-based Assistance
x		Conversion of Public Housing to Project-based Rental Assistance or Project-based Vouchers under RAD
	X	Occupancy by Over-income Families
	X	Occupancy by Police Officers
	X	Non-smoking Policies
x		Project-based Vouchers
x		Units with Approved Vacancies for Modernization
x		Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants)

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

HOPE VI or Choice Neighborhoods

RRHA continues to work towards closure of its HOPE VI Grant. The agency identified ninety-six (96) vacant parcels in RRHA's inventory, and the plan is to procure developer partners who can build homeownership units according to RRHA's HOPE VI Homeownership plan without the need for RRHA to contribute any funding. RRHA may also oversee the development of affordable and market rate homeownership units on parcels without HOPE VI program restrictions.

Specifically, RRHA's HOPE VI grant has helped to construct fourteen (14) senior cottages in the Blackwell neighborhood. This first phase is complete and occupied; RRHA has completed an additional four (4) cottages in a second phase. Additional information about the Senior Cottages can be found in the tables located in **Exhibit B.2-1**, attached hereto.

RRHA was thrilled to receive a Choice Neighborhoods Initiative ("CNI") Planning Grant for Gilpin Court. These funds have supported the planning process for the redevelopment of Gilpin Court. As part of the planning process for a revitalized Gilpin Court, RRHA has relocated its administrative offices, formerly located at 901 and 918 Chamberlayne Parkway in Richmond. It is now contemplated these parcels will be used as a part of redevelopment.

During this Plan year, RRHA may apply for additional CNI grants when HUD publishes any Notice of Funding Availability. Any such application RRHA submits may be for Creighton, Fairfield, Gilpin, Hillside, Mosby, or Whitcomb Courts.

Mixed Finance Modernization or Development

Like many housing authorities, RRHA's goal is to reposition its entire public housing portfolio into mixed-income, mixed-use communities that offer a variety of quality housing options for families at all income levels as well as a host of other amenities and opportunities.

RRHA envisions that it may employ a range of options to achieve this goal. This includes, without limitation: modernization of existing public housing units, demolition of specific sections or entire developments, construction of new units (including market-rate and homeownership opportunities), acquisition of parcels around RRHA's communities for additional construction or redevelopment, and/or voluntary conversion of public housing to project-based assistance.

Redeveloping these communities may require a partnership between RRHA and a private developer partner or RRHA may choose to self-develop, either through the agency or one or more subsidiary entities. In either case, RRHA plans to make use of HUD's repositioning resources as well as private or other public funding resources as appropriate for each activity. In all of the redevelopment efforts, RRHA and selected development partners will strive to develop housing that is energy efficient. This may be done by meeting standards and guidelines including but not limited to: Earth Craft housing standards, Leadership in Energy and Environmental Design (LEED) guidelines, Enterprise Green Communities standards, or passive housing and net zero energy standards.

Specifically, RRHA may use Capital Funds and other public and private funds, when available and appropriate, to redevelop the agency's entire Annual Contributions Contract ("ACC") portfolio. This portfolio includes, but is not limited to: Creighton Court, Fairfield Court, Gilpin Court (including the agency's administrative offices at 901 and 918 Chamberlayne Parkway), Hillside Court, Mosby Court, Whitcomb Court, Dove Street, Frederic Fay Towers, and scattered site elderly developments.

RRHA has selected a development partner for Creighton Court and Mosby Court, and plans to do the same for Gilpin, Fairfield, Hillside, and Whitcomb Courts. This selection and planning process will involve community engagement and other stakeholder outreach to assist RRHA in arriving at a master plan for the redeveloped 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.

Additionally, RRHA may utilize one or more subsidiary entities for development, financing, ownership, or operation of public and non-public housing programs.

RRHA may propose other affordable housing developments and mixed-finance transactions, via acquisition and/or new construction, later in the Plan year commensurate with RRHA's Strategic Plan. Financing may include use of regular Capital Funds or HUD's Capital Fund Financing Program (CFFP), which permits borrowing

against future flow of annual Capital Funds.

As always, RRHA will submit all necessary applications to HUD for review and approval prior to undertaking any of these plans.

Additional information about these plans can be found in the tables located in **Exhibit B.2-1**, attached hereto.

Demolition and/or Disposition

Most of RRHA's public housing inventory was constructed between forty-five (45) and eighty (80) years ago. Recent Physical Needs Assessments for Creighton, Fairfield, Gilpin, Hillside, Mosby, and Whitcomb courts – what many around Richmond know as RRHA's "Big Six" – used inspections and financial analyses and concluded that all six developments are functionally obsolete and that addressing the significant capital needs in these buildings would be cost ineffective.

Therefore, RRHA may utilize various HUD repositioning strategies to continue to provide quality, affordable housing around the City of Richmond. This may include, without limitation: Section 18 Demolition/Disposition, Rental Assistance Demonstration ("RAD"), and RAD/Section 18 Blend. These programs will enable RRHA to leverage public resources, such HUD Choice Neighborhoods Initiative and other grant or subsidy funding, and private capital to create vibrant communities where families at every income level can live, work, learn, shop, and play.

Transformation of RRHA's Big Six will involve the entire development, including dwelling units, non-dwelling units – such as, but not limited to, Creighton Court Management Office, Fairfield Court Management Office, Gilpin Court Management Office, Hillside Court Management Office, Mosby Court Management Office, Whitcomb Court Management Office, RRHA Administrative Offices, Friends Day Care center, and other non-dwelling units – and vacant land in the communities.

Additionally, HUD approved RRHA's applications for disposition of 110 single-family public housing units that were previously approved under a Section 32 Homeownership plan. These units have been or will be transferred to nonprofit developer partners who will rehabilitate or construct homes to sell, many of which will be designated for families earning at or below 80% AMI. More information on this can be found in Section B.1, "Homeownership Programs".

Specific information about these plans can be found in the tables located in **Exhibit B.2-1**, attached hereto.

Designated Housing for Elderly and/or Disabled Families

In accordance with applicable law and regulation, RRHA operates certain, designated public housing communities that restrict occupancy to individuals who are elderly, near elderly, or disabled.

Specifically, RRHA has constructed the first phase of the Blackwell Senior Cottages that consists of fourteen (14) units that are designated for elderly individuals and allow them to age in place. An additional four (4) units are currently under construction in the second phase of this development, with the third and final phase planned for the remaining four (4) units.

Additional information about these communities, including planned developments, can be found in the tables located in **Exhibit B.2-2**, attached hereto.

Conversion of Public Housing to Tenant-based Assistance

As part of RRHA's planned repositioning of its public housing communities, the agency will continue to analyze its inventory. RRHA may convert public housing to tenant-based assistance when it is economically feasible and will increase housing opportunities.

Such conversion may involve applications for Section 18 Demolition/Disposition or a RAD/Section 18 Blend for the following public housing communities: Creighton Court, Fairfield Court, Gilpin Court, Hillside Court, Mosby Court, Whitcomb Court, 700 South Lombardy, 1611 4th Avenue, 1920 Stonewall, 3900 Old Brook, Fox Manor, 1200 Decatur or other public housing in RRHA's inventory.

Information about specific plans and applications is found elsewhere in this section and in relevant exhibits attached to this Plan.

Conversion of Public Housing to Project-based Rental Assistance or Project-based Vouchers under RAD

RRHA may convert public housing to Project-based Rental Assistance ("PBRA") or Project-based Vouchers ("PBV") assistance under HUD's Rental Assistance Demonstration ("RAD"). Information about specific applications and plans can be found in tables located in **Exhibit B.2-3**, attached hereto.

Every such RAD conversion will occur 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 protections, rights, participation, waiting list and grievance procedures are attached hereto as **Exhibit B.2-4**.

A reference to HUD Notice H-2016-17, PIH-2016-17 (HA) is attached hereto as **Exhibit B.2-5**.

RRHA will make the full text of these HUD Notices available to anyone upon request and all are incorporated into this Annual Plan by reference as if fully laid out herein.

Additionally, the RRHA 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.

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. This approach utilizes a variety of financial resources and partnerships; therefore, it may be necessary to realign the various developments based on financial feasibility or other factors related to project implementation.

Project-based Vouchers

RRHA consistently searches for opportunities to provide families with quality housing, with access to wonderful amenities, through HUD's Project-based Voucher ("PBV") program. Specifically for this Plan year, RRHA expects to increase its PBV authority in and around the City of Richmond. More information on the particular PBV communities is located in **Exhibit B.2-7**.

These new PBV opportunities will comply with PBV goals, civil rights requirements, HUD's National Standards for the Physical Inspection of Real Estate ("NSPIRE"), and deconcentration standards. Additional information about how RRHA works to meet these goals and standards is found in RRHA's Administrative Plan, submitted along with this Plan.

Additionally, the RRHA PBV program is consistent with this Plan as it encourages the rehabilitation or development of mixed-income, possibly mixed-use communities throughout the City of Richmond and neighboring localities, including several areas with low levels of poverty and segregation and high levels of opportunities.

Other Capital Grant Programs

All of RRHA's hard work on a recent application for a Choice Neighborhoods Initiative Planning Grant paid off when the agency was one of a small group of housing authorities to be awarded such funding. These dollars assisted RRHA and partner organizations engage residents and other stakeholders in the redevelopment of Gilpin Court and the larger Jackson Ward neighborhood.

RRHA is in its third year of the Choice Neighborhood Initiative (CNI) Planning Grant. In the past year, RRHA, in partnership with the City of Richmond, the Richmond City Health District, and Urban Strategies Inc. have been meeting with stakeholders, community members, and residents to finalize the community plan for Gilpin Court and Jackson Ward. The plan was submitted to HUD in November 2023. RRHA and The City of Richmond now work to complete the Early Action Activity which is a splash pad in the Calhoun Center Park. RRHA's Finance department will carefully monitor these grant funds and project spending and will assist with draw downs as necessary.

B.3: Progress Report

RRHA is actively working towards the agency's goals and objectives detailed in previous Annual and 5-Year plans. Specifically, RRHA has made progress on the following:

1. Increase real estate development activity to create revitalized residential communities supported by commercial and retail. Coordinate planned and desired development activity through a five-year comprehensive repositioning financial plan.

Draft plan revisions will be completed by April 30, 2025.

Analysis of repositioning impact of the "Big 6" is underway and is expected to be completed by June 30, 2025.

2. Increase asset management capacity within the Authority and its development subsidiary to support the repositioning of the public housing portfolio and new pursuits in affordable housing and commercial sectors.

Analysis of repositioning impact of the "Big 6" is underway and is expected to be completed by June 30, 2025.

RRHA has been very successful at using project-based vouchers ("PBVs") in communities located in high opportunity areas. This success continued in 2025, with the issuance of a new Request for Proposals resulting in the award of 170 PBVs across five (5) projects.

3. Implement quality control procedures in property management, asset management and procurement to increase Authority efficiency, improve customer service levels, and reestablish fiscal responsibility.

RRHA has implemented an Agency-wide Comprehensive Compliance and Quality Control process requiring ongoing oversight of each department using a systematic approach to ensure that operations adhere to legal, regulatory, and internal standards.

Weekly Key Performance Indicators (KPI) have been drafted and implemented for Low Income Public Housing and the Housing Choice Voucher Programs

As part of the reestablishment of the agency's fiscal responsibility and to be more accessible to our clients, RRHA's Call Center, Tenant Selection, Inspections and Housing Choice Voucher Departments will be moving back to the RRHA owned administrative office building at 918 Chamberlayne Ave.

Procurement has established a contract log to monitor and track agency contracts.

RRHA has received new 2025 funding to add an additional FSS coordinator. The goal is to expand the FSS program by adding 60 additional participants for a total of 120 in public housing.

RRHA's Youth Employment and Leadership Academy has grown to over 165 participants.

RRHA plans to continue this program and is seeking grant funding in 2025 to support and maintain for public housing youth

With the support of our partners, RRHA has opened three more STEM/Computer labs and plan to open 2 additional labs in 2025 in the remaining (family) public housing communities. Furthermore, with the assistance of partners and Resident Services staff, RRHA is offering computer classes/training in the agency's 6 senior communities. RRHA partners include: Virginia Union University, Verizon, Strategies to Elevate People (STEP), STEM Education and Innovation Center (STEMEIC) HumanKind. RRHA will be adding partners and additional resources going forward.

Resident Services continues to assess every LIPH family under a LIFTS ("Leading Individuals and Families towards Self-sufficiency") model. These assessments identify each family's needs in the areas of: Employment, Job/Technical training, Youth and Young adult programs, Education, Health and Wellness.

4. Develop an organizational structure responsive to current staffing needs and projected changes in Authority roles and responsibilities.

RRHA is undergoing organizational and functional re-alignment with a focus on enhanced service delivery, employee development and increased efficiencies (i.e. quality control and compliance protocols, updating job descriptions, and a comprehensive employee training program). Critical leadership positions have been filled. A reorganization of the Affordable Housing program started in late 2024 and is expected to be complete by October 2025. The Finance Department has been reorganized and effectively staffed.

B.4: Capital Improvements

See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 07/18//2024. See updated Capital Fund Plan document for next five (5) years.

B.5: Most Recent Fiscal Year Audit

(a) Were there any findings in the most recent FY Audit?

☒ Yes

☐ No

(b) If yes, please describe:

1.) Finding 2023-001: Missing Tenant Income Information (Significant Deficiency)

Since the audit finding notice, RRHA staff received rent calculation refresher/certification training which included collection, review and retention of tenant income information. In addition, quality control rent calculation protocols have been put in place as part of the RRHA's Agency-wide Comprehensive Compliance and Quality Control efforts.

C. Other Documents and/or Certification Requirements

C.1: Resident Advisory Board (“RAB”) Comments

(a) Did the RAB(s) have comments to the PHA Plan?

☐ Yes ☒ No

(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHA’s must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

C.2: Certification by State or Local Officials

TO BE COMPLETED, SIGNED AND ADDED TO THE ANNUAL PLAN IS FINALIZED FOR SUBMISSION TO HUD.

A completed and signed Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, **Exhibit C.2**.

C.3: Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan

TO BE COMPLETED, SIGNED AND ADDED ONCE THE ANNUAL PLAN IS FINALIZED FOR SUBMISSION TO HUD.

A completed and signed Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*, **Exhibit C.3**.

C.4: Challenged Elements

If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.

(a) Did the public challenge any elements of the Plan?

☐ Yes ☒ No

(b) If yes, include Challenged Elements.

C.5: Troubled PHA

(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?

☐ **Yes**

X☒

No

(b) If yes, please describe: RRHA entered into a Voluntary Compliance Agreement October 18, 2024.

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D. Affirmatively Furthering Fair Housing (“AFFH”)

D.1: Affirmatively Furthering Fair Housing (“AFFH”)

RRHA remains deeply committed to ensuring that all persons have equal access to the agency’s programs and services. To that end, RRHA partnered with the City of Richmond and other neighboring jurisdictions to conduct a Regional Analysis of Impediments to Fair Housing choice. RRHA continues to work towards accomplishing the goals outlined in the Regional Analysis of Impediments to Fair Housing Choice through its work with the City of Richmond and surrounding jurisdictions.

This analysis, conducted by Root Policy Research (December 2020), examined the Richmond region’s structural and historical barriers to fair housing opportunities for members of protected classes and historically marginalized groups. It identified five core impediments to fair housing choice in and around the City of Richmond:

1. Furthering fair and equitable housing;
 - a. Historical actions of forced segregation.
 - b. Limited, declining, or inconsistent local and federal funding and resources.
 - c. Restrictive land use codes and development standards.
2. Rental housing choices;
 - a. Geographic concentration of affordable rental units.
 - b. Market forces causing rent amounts to increase faster than income.
 - c. Landlord refusal to accept housing choice vouchers.
 - d. Landlord willingness to evict tenants, sometimes without cause.
 - e. Limited funding for housing choice vouchers.
 - f. Limited income supports for persons with a disability and lack of accessible affordable units.
3. Attaining homeownership;
 - a. Historical discrimination and segregation in homeownership opportunities.
 - b. Historical and recent discrimination in the lending process.
4. Accessing high opportunity environments; and
 - a. Job-rich areas lack affordable housing and transit access.
 - b. Region’s inadequate public transportation systems.
 - c. Disparity in access to high quality educational opportunities.
5. Fair housing knowledge and awareness.
 - a. Lack of knowledge and awareness in fair housing laws.
 - b. Lack of understanding of Virginia’s recent source of income protections.

RRHA also conducted an analysis of self-reported disabilities by families on RRHA's waiting lists. A summary of these stated needs is attached to this Plan as **Exhibit D.1**.

With this understanding, RRHA has implemented, continues to implement, or will implement the following strategies to address these stated impediments:

Furthering Fair and Equitable Housing

Continue to improve internal processes to ensure fair and equitable housing.

- RRHA has developed a Compliance Department and appointed a Chief Compliance Officer to better assess, and address Agency needs in accordance with HUD Regulations, Fair Housing and Quality Assurance.
- RRHA continues to revise key fair housing plans, policies, and procedures. Specifically, RRHA revised the agency's Reasonable Accommodation Policy and procedures to include a Notice of the availability of Auxiliary Aids and Effective Communication Policy
- RRHA continues to provide telephonic and document translation services for LEP clients upon request. RRHA will utilize communication cards to better serve in person clients and stakeholders with vision or hearing impairments.
- RHA has acquired and trained staff on the use of YARDI's Case Manager software to better implement internal and external customer service controls while tracking all customer engagements and addressing needs in a reasonable timeframe (i.e. Reasonable Accommodation requests). Requests will be tracked and assigned to key staff (with due dates embedded) to allow for better tracking and report compilation.
- RRHA continues to enhance its Emergency Transfer Protocol to review and process unit transfers within the agency's LIPH program, giving priority to Reasonable Accommodation and VAWA transfers, resulting in timely transfer offers once a family makes such a request.
- RRHA continues to provide HCV participants, with disabilities, voucher extensions and/or exceptions to the payment standards when needed to allow the family adequate time to find quality, decent and affordable housing with the necessary accessibility features in higher opportunity areas.
- RRHA will continue to enhance its communication of Fair Housing and Reasonable Accommodation policies and procedures from application to end of participation – to the public, its applicants, residents and participants via its Notice of Reasonable Accommodation and Auxiliary Aids and Effective Communication Policy which will be provided to all affordable housing applicants and participants. Efforts will include, but are not limited to, the use of 711 Relay services, in person visits to any RRHA office, communication updates via the agency's website, via email and social media platforms.

Increase the number of accessible affordable units throughout the City of Richmond

and in neighboring jurisdictions.

- RRHA continues to grant reasonable accommodations for persons who make such a request. This may include, but is not limited to, adding features to make an existing unit accessible or transferring a family to another LIPH unit that has the needed features.
- RRHA continues a partnership with HOME (“Housing Opportunities Made Equal”) of Virginia, who provides resources to voucher recipients and can assist with searching for homes that have necessary accessibility features and that are in high opportunity areas.
- RRHA has worked with developers to exceed the legally required minimum number of accessible units in rehabilitated or new developments. Specifically:
 - RRHA will equip all Blackwell Senior cottages with sensory equipment.
 - Richmond Family 1 and 2: 204 total units; 37 have fully accessible under UFAS requirements.
 - Baker School: 50 total units, all with accessibility features to allow residents to age in place. This includes units with additional sensory features, which are set aside for persons with hearing or vision differences.
 - Creighton Phase 1: 68 total units; 14 universal design units, 7 units meeting UFAS requirements, and 2 units with sensory features.
 - Armstrong Renaissance
 - RRHA completed the first senior phase in 2019. It has 45 units, fully occupied by senior residents, all with features to allow them to age in place.
 - The second phase is also now complete, providing an additional 45 units like those in the first phase.

Rental Housing Choices

Work with local and regional partners to strengthen funding for eviction mediation and diversion programs.

- The City of Richmond is one of four Virginia localities with mandated Eviction Diversion Pilot Program. This program, which is codified in state law, requires that landlords offer tenants repayment agreements for all amounts owed in certain circumstances; it also provides funding for Housing Counselors and volunteers to advise tenants of their rights. RRHA has happily participated in this program and will continue to offer residents the opportunity to enter into a repayment agreement with more favorable terms than those required by law. Additionally, RRHA staff have put a lot of energy and long hours into helping RRHA families apply for and secure rental assistance funding. To date, RRHA has submitted over 3,000 applications and the agency has received nearly \$4 million

to pay towards tenant balances. RRHA continues to offer repayment agreements to give families more time to get past due balances paid and bring their rental accounts current.

Support local, state, and federal legislative and regulatory priorities that seek to address rental housing disparities.

- RRHA vocally supported Virginia’s “Source of Income/Funds” protection that prohibits landlords from denying a potential tenant solely because some or all of their income for housing comes from a government agency, such as RRHA or other housing authorities.
- RRHA has also advocated for a state or local inclusionary zoning requirement and property tax abatement for affordable units; the agency will continue to support such measures until they become law. The goal is to permit more flexible land use, thus making it easier to create affordable housing in more places and provide financial incentives for developers to include affordable units in current and planned developments.

Attaining Homeownership

Construct new homes. RRHA has worked with, and will continue to work with, developers in the construction of single-family homes on parcels in RRHA’s inventory. Many of these new homes are made available and affordable for families earning at or below 80% AMI.

Establish RRHA ComeHome program. RRHA rolled out its “Come Home” Homeownership Program for Low-Income Public Housing residents and Housing Choice Voucher Program participants. (see Section B. Plan Elements for detail).

Open a Homeownership Resource Center. RRHA continues to move forward with opening a comprehensive Home Center to assist first-time homebuyers, particularly those at lower income levels, with all aspects of the home buying process in one centralized location. Through agency resources and partnerships with outside organizations, RRHA plans to provide information, resources, and supportive services.

Utilize RRHA funds when permitted and appropriate. When permitted under relevant law, regulation, and guidance, and when RRHA determines it appropriate, RRHA may use agency funds to assist purchasers with down payments, closing cost assistance, and other subsidies to support homeownership.

Accessing High Opportunity Environments

Partnership with HOME. RRHA continues its partnership with Housing Opportunities

Made Equal (“H.O.M.E.”) of Virginia. This partnership assists voucher holders with locating housing in high opportunity areas. In 2024, through H.O.M.E.’s Mobility Program, their Housing Counselors attended 29 (RRHA) HCV Program Briefings and assisted 244 of RRHA’s voucher families - offering housing counseling services and assisted families with finding housing outside of areas of concentrated poverty.

Landlord Outreach, Recruitment, and Education. RRHA continues to work had to increase the number of landlords who participate in the HCV program, particularly those in high opportunity areas. Specifically, RRHA:

- Has offered an online landlord portal through which landlords can review all relevant documents and receive information from RRHA.
- Takes great pride in the prompt review and decision on requests for tenancies, inspections, contract rent adjustments, and monthly HAP payments. This has proven to be invaluable at retaining good landlords.
- Provides landlords with important information on Virginia’s source of funds protections and the benefits of participating in RRHA’s HCV program.
- Studied, and will continue to study, the feasibility of providing financial incentives to landlords, such as making funds available to offset any tenant-caused damage and security deposit payments.
 - In 2025, RRHA established a landlord incentive in which landlords receive \$250 for each new unit added to the program; voucher holders receive up to \$150 to use toward landlord move-in fees
- Is considering and evaluating the feasibility of adopting Small Area Fair Market Rents (“SAFMR”) in accordance with HUD regulation and guidance.
- Is creating a good neighboring training program for voucher holders. The certification provided at the completion of the program
- Continues to hold landlord educational sessions and will be adding a “How to be a Successful Landlord” workshop
- Is developing a “How to be a Successful Renter” workshop series, in partnership with Virginia Housing and the local NAACP, that provides training for voucher holders. Voucher holders completing the training will receive a “good neighbor” certificate to demonstrate to potential Landlords renter readiness and dispel negative perception of voucher holders
- Is establishing a Landlord Ambassadors program in which current landlords enlist new landlords lease units to voucher holders.
- Continue hosting Lease and Meet events that connect Landlords and voucher holders

Build Self Sufficiency and Job Readiness.

- RRHA’s Resident Services department has continued to evaluate all LIPH families for ability and need in these areas (see Section B.3, Item 3).
- RRHA’s Public Safety Department will create a Youth Services program that will allow for training/apprenticeships and employment placements for youth.

- RRHA has also offered, and will continue to offer classes and training on: budget management, private market rentals, connecting and paying utilities, and housekeeping to help our families succeed when they move to other housing.
- RRHA has continued to create job opportunities under Section 3.
 - Current real estate developments have resulted in 30 RRHA residents being hired.
 - RRHA's Board of Commissioners approved the revised Section 3 policy on March 15, 2023.
 - RRHA's Board of Commissioners approved the new MCB/DBE policy on October 18, 2023. The implementation of this policy creates a pathway for minority, disadvantaged, and women-owned businesses to "position themselves" for new contract opportunities. Additionally, this allows RRHA to achieve both HUD and RRHA goals for Section 3 participation.

Project-Based Vouchers. RRHA has been very successful at using project-based vouchers ("PBVs") in communities located in high opportunity areas. This success continued in 2025, with the issuance of a new Request for Proposals resulting in the award of 170 PBVs across five (5) projects.

Reference PBV chart (ExhibitB.2-7).

Fair Housing Knowledge and Awareness

Fair housing education and outreach programs.

- RRHA continues to procure the services of nationally recognized Housing Trainers to create comprehensive a Fair Housing training curriculum catered to the agency's needs. New employees are expected to complete the training within their first ninety (90) days of on-boarding, while existing staff will complete eight hours of Fair Housing and Reasonable Accommodation training annually.
- RRHA continues to provide training, information and updates on Fair Housing topics to its stakeholders and the public in its administrative offices, via email, on the agency's website (in the designated "Fair Housing" sections) and social media platforms.
- RRHA celebrates Fair Housing Month annually providing local, state and federal legislative updates to staff and stakeholders.
- Applicants, residents and participants are provided with instructions on requesting a reasonable accommodation, from application to move out.

RRHA's Commitment. RRHA has been very vocal and transparent about our commitment to fair and equitable housing, with information provided during Housing Choice Voucher briefings, in Public Housing Orientation material and making information available on the agency's website, social media channels, and posted at all RRHA office buildings. The agency will continue to clearly state and show this

commitment with ongoing partnerships with Housing Opportunities Made Equal (H.O.M.E.), the Virginia Fair Housing Office and other Fair Housing agencies.

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Exhibit A

Copies of this Plan, documents related to Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public at the following locations:

RRHA's website (www.rrha.com)

RRHA's central office:

600 E. Broad Street, 4th Floor Richmond, VA 23220

600 E. Broad Street, 5th Floor, Richmond, VA 23220

RRHA's AMP Property Management offices:

Creighton Court

Fairfield Court

Gilpin Court

Hillside Court

Mosby Court

Whitcomb Court

Stonewall AMP

Additionally, all members of RRHA's Resident Advisory Board (RAB) received an electronic and/or hard copy of these documents and information.

Exhibit B.1-1

Housing Needs of Families on RRHA's Waiting Lists¹

LIPH Waiting List (4,698 total families)		
	# of Families	% of Total Families
By Income Level		
Extremely Low Income (at or below 30% AMI)	3,648	77.7%
Very Low Income (between 30% and 50% AMI)	818	17.4%
Low Income (between 50% and 80% AMI)	207	4.4%
Family Characteristics		
Families with Children	1,359	28.9%
Elderly Families	176	3.8%
Families with Disabilities	956	20.4%
Racial Distribution		
White	615	13.1%
Black	4,168	88.7%
Asian/Pacific Islander/Other	267	5.7%
Hispanic	232	4.9%
Bedroom Size		
1 Bedroom	3,878	82.6%
2 Bedroom	525	11.2%
3 Bedroom	70	1.5%
4 Bedroom	156	3.3%
5 Bedroom	69	1.5%

Is this waiting list closed?	No
If Yes:	
How long has it been closed (# of months)?	
Does the PHA plan to reopen this list in this Plan year?	n/a
Does the PHA permit specific categories of families onto this waiting list, even if generally closed?	No

LIPH Elderly Waiting List (1,149 total families)		
	# of Families	% of Total Families
By Income Level		
Extremely Low Income (at or below 30% AMI)	993	86.4%
Very Low Income (between 30% and 50% AMI)	120	10.4%
Low Income (between 50% and 80% AMI)	30	2.6%
Family Characteristics		
Families with Children	21	1.8%
Elderly Families	621	54.1%
Families with Disabilities	639	55.6%
Racial Distribution		
White	138	12.0%
Black	1009	87.8%
Asian/Pacific Islander/Other	42	3.7%
Hispanic	30	2.6%
Bedroom Size		
1 Bedroom	1,134	98.7%
2 Bedroom	0	0.0%
3 Bedroom	0	0.0%
4 Bedroom	0	0.0%
5 Bedroom	0	0.0%
Is this waiting list closed?		Yes
If Yes:		
How long has it been closed (# of months)?		3
Does the PHA plan to reopen this list in this Plan year?		No
Does the PHA permit specific categories of families onto this waiting list, even if generally closed?		No

HCVP Waiting List (3,650 total families)		
	# of Families	% of Total Families
By Income Level		
Extremely Low Income (at or below 30% AMI)	0	0.0%
Very Low Income (between 30% and 50% AMI)	0	0.0%
Low Income (between 50% and 80% AMI)	0	0.0%
Family Characteristics		
Families with Children	1915	52.5%
Elderly Families	275	7.5%
Families with Disabilities	758	20.8%
Racial Distribution		
White	376	10.3%
Black	3,343	91.6%
Asian/Pacific Islander/Other	152	4.2%
Hispanic	124	3.4%
Bedroom Size		
1 Bedroom	0	0.0%
2 Bedroom	0	0.0%
3 Bedroom	0	0.0%
4 Bedroom	0	0.0%
5 Bedroom	0	0.0%

Is this waiting list closed?	Yes
If Yes:	
How long has it been closed (# of months)?	9
Does the PHA plan to reopen this list in this Plan year?	Yes
Does the PHA permit specific categories of families onto this waiting list, even if generally closed?	No

¹ All data presented in this Exhibit B is as of March 25, 2025. It is self-reported by families when they apply for the waiting list and RRHA does not independently verify this information until such time as the family is selected from the waiting list and RRHA begins to review the family's information and documents to determine program eligibility. Additionally, because families self-report this information, one family may be counted in multiple parts of one or more sections, resulting in total percentages or numbers that exceed 100%.

Exhibit B.1-2

Summary of Changes to RRHA's Admissions & Continued Occupancy Policy ("ACOP")

For purposes of Public Comment and Review you may access the Summary of changes on RRHA's website at www.rrha.com , Reports and Plans, FY 2026.

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Exhibit B.1-3

Summary of Changes to RRHA's Administrative Plan

For purposes of Public Comment and Review you may access the Summary of changes on RRHA's website at www.rrha.com , Reports and Plans, FY 2026.

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Exhibit B.1-4

Statement of Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants		
a) Public Housing Operating Fund	23,567,322	
b) Public Housing Capital Fund	16,150,249	
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	38,035,493	
g) Family Self-Sufficiency Grant	86,200	
h) Resident Opportunity and Supportive Services Grant	0	
Other Federal Grants (list below)	-0-	
2. Prior Year Federal Grants (unobligated funds only) (list below)		
CFP 2019 as of 12/31/2024	1,109,025	In accordance with application
CFP 2020 as of 12/31/2024	3,432,541	In accordance with application
CFP 2021 as of 12/31/2024	5,804,095	In accordance with application
CFP 2022 as of 12/31/2024	13,803,464	In accordance with application
CFP 2023 as of 12/31/2024	1,233,800	In accordance with application
CFP 2024 as of 12/31/2024	12,782,945	In accordance with application
3. Public Housing Dwelling Rental Income	11,785,000	Operations of PHA sites
4. Other income (list below)		
Leases	0	LIPH Operations
Estimated HUD Held Cash Reserves for 2022	996,000	HCVP HAP
5. Non-federal sources (list below)		
Interest – 300,543		RECD Operations and LIPH Dispositions
Sale of Property – 50,000		RECD Operations
Bond Fees – 455,191		RECD Operations
Developer Fees – 83,000		RECD Operations
Perm Loan Payment – 121,609		
	838,734	
Total resources	\$105,481,686	
Note: Sources primarily based on the 2025 Budget.		

Exhibit B.2-1

Tables of New and Planned Modernization, Redevelopment, Demolition and/or Disposition, and Conversion Projects

Table # 1: Demolition/Disposition Activity Description	
1a. Development name:	Small House/Used House
1b. Development (project) number:	VA007000016
2. Activity type:	<input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one):	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	04/28/2017
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:	
7a. Actual or projected start date of activity:	07/15/2016
7b. Projected end date of activity:	12/31/2024

Table # 2: Demolition/Disposition Activity Description	
1a. Development name:	Frederick Fay Towers*
1b. Development (project) number:	VA007000501
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one):	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	11/03/2013
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:	
7a. Actual or projected start date of activity:	01/01/2015
7b. Projected end date of activity:	12/31/2026

*Note: Fay Towers is under a Rental Assistance Demonstration ("RAD") application.

Table # 3: Demolition/Disposition Activity Description	
1a. Development name:	Gilpin Court
1b. Development (project) number:	VA007000001
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one):	<input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	12/2024
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:	
7a. Actual or projected start date of activity:	12/15/2024
7b. Projected end date of activity:	12/31/2032

Table # 4: Demolition/Disposition Activity Description	
1a. Development name:	Gilpin Court – Administrative Offices
1b. Development (project) number:	VA007000001
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input type="checkbox"/> Disposition
3. Application status (select one):	<input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	12/2025
5. Number of units affected:	1 – non-dwelling, ancillary to public housing
6. Coverage of action (select one):	<input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity:	
7a. Actual or projected start date of activity:	12/15/2025
7b. Projected end date of activity:	12/31/2032

Table # 5: Demolition/Disposition Activity Description	
1a. Development name:	Hillside Court
1b. Development (project) number:	VA007000004
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one):	<input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	11/2025
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:	
7a. Actual or projected start date of activity:	07/1/2026
7b. Projected end date of activity:	12/31/2032

Table # 6: Demolition/Disposition Activity Description	
1a. Development name:	Fairfield Court
1b. Development (project) number:	VA007000007
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one):	<input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	11/2025
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:	
7a. Actual or projected start date of activity:	01/01/2025
7b. Projected end date of activity:	12/31/2030

Table # 7: Demolition/Disposition Activity Description	
1a. Development name:	Whitcomb Court
1b. Development (project) number:	VA007000006
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one):	<input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	11/2025
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:	
7a. Actual or projected start date of activity:	01/01/2025
7b. Projected end date of activity:	12/31/2030

Table # 8: Demolition/Disposition Activity Description	
1a. Development name:	Mosby Court
1b. Development (project) number:	VA007000008
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one):	<input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	09/2026
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:	
7a. Actual or projected start date of activity:	9/1/2024
7b. Projected end date of activity:	12/31/2030

Table # 9: Demolition/Disposition Activity Description	
1a. Development name:	Creighton Court
1b. Development (project) number:	VA007000005
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one):	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	03/2021
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:	
7a. Actual or projected start date of activity:	12/15/2016
7b. Projected end date of activity:	12/31/2027

Table # 10: Demolition/Disposition Activity Description	
1a. Development name:	Creighton Court
1b. Development (project) number:	VA007000005
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one):	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	12/2020
5. Number of units affected:	102
6. Coverage of action (select one):	<input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity:	
7a. Actual or projected start date of activity:	01/2021
7b. Projected end date of activity:	12/31/2027

Table # 11: Demolition/Disposition Activity Description	
1a. Development name:	Creighton Court
1b. Development (project) number:	VA007000005
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one):	<input type="checkbox"/> X Submitted, pending approval <input type="checkbox"/> Planned application Approved
4. Date application approved, submitted, or planned for submission:	12/2020
5. Number of units affected:	210
6. Coverage of action (select one):	<input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity:	
7a. Actual or projected start date of activity:	01/2021
7b. Projected end date of activity:	12/31/2027

Table # 12: Public Housing Homeownership Activity Description	
1a. Development name:	Blackwell
1b. Development (project) number:	VA36URD007I197
2. Federal Program authority:	<input checked="" type="checkbox"/> HOPE VI <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/01/1999)
3. Application status (select one):	<input checked="" type="checkbox"/> Approved; included in the PHA's Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission:	11/10/2021 (approved)
5. Number of units affected:	99
6. Coverage of action (select one):	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Table # 13: Public Housing Homeownership Activity Description	
1a. Development name:	Creighton Court
1b. Development (project) number:	DDA0003029
2. Federal Program authority:	<input type="checkbox"/> HOPE VI <input checked="" type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/01/1999)
3. Application status (select one):	<input checked="" type="checkbox"/> Approved; included in the PHA's Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission:	11/10/2021 (approved)
5. Number of units affected:	1
6. Coverage of action (select one):	<input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development

Exhibit B.2-2

Tables of New and Planned Designated Housing for Elderly and/or Disabled Families

Table # 1 Designation of Public Housing Activity Description	
1a. Development name:	Blackwell Senior Cottages (Phase 1)
1b. Development (project) number:	VA007000037
2. Designation type:	<input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by only families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one):	<input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation approved, submitted, or planned for submission:	03/21/2014 (approved)
5. If approved, this designation constitutes 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:	14
7. Coverage of action (select one):	<input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development

Table # 2 Designation of Public Housing Activity Description	
1a. Development name:	Blackwell Senior Cottages (Phase 2)
1b. Development (project) number:	VA007000038
2. Designation type:	<input checked="" type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by only families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one):	<input checked="" type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation approved, submitted, or planned for submission:	03/21/2014 (approved)
5. If approved, this designation constitutes 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:	4
7. Coverage of action (select one):	<input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development

Exhibit B.2-3

Tables of New and Planned Rental Assistance Demonstration (“RAD”) Conversions

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

Development # 2			
Name of Public Housing Development:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Townes at River South	VA007990000	PBV/PBRA	0
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund Allocation of Development:
161	Family	Family	\$120,028.00
Bedroom Type:	Number of Units Pre-conversion:	Number of Units Post-Conversion:	Change in Number of Units per Bedroom Type and Why:
Efficiency:	0	0	0
One Bedroom:	0	0	0
Two Bedroom:	0	0	0
Three Bedroom:	75	75	0
Four Bedroom:	0	0	0
Total Units:	75	75	

Development # 3			
Name of Public Housing Development:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Gilpin Court	VA007000001	PBV	0
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund Allocation of Development:
781	Family	Family	\$43,264.00
Bedroom Type:	Number of Units Pre-conversion:	Number of Units Post-Conversion:	Change in Number of Units per Bedroom Type and Why:
Efficiency:	0	781	0
One Bedroom:	103		
Two Bedroom:	361		
Three Bedroom:	228		
Four Bedroom:	84		
Five Bedroom:	4		
Non-dwelling:	1		
Total Units:	781		

Development # 4			
Name of Public Housing Development:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Hillside Court	VA007000004	PBV	0
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund Allocation of Development:
471	Family	Family	\$1,486,426.00
Bedroom Type:	Number of Units Pre-conversion:	Number of Units Post-Conversion:	Change in Number of Units per Bedroom Type and Why:
Efficiency:	0	471	0
One Bedroom:	80		
Two Bedroom:	232		
Three Bedroom:	131		
Four Bedroom:	26		
Five Bedroom	1		
Non-dwelling:	1		
Total Units:	471		

Development # 5			
Name of Public Housing Development:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Creighton Court	VA007000005	PBV	0
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund Allocation of Development:
504	Family	Family	\$1,571,898.00
Bedroom Type:	Number of Units Pre-conversion:	Number of Units Post-Conversion:	Change in Number of Units per Bedroom Type and Why:
Efficiency:	0	680	Increasing total number of affordable units
One Bedroom:	121		
Two Bedroom:	207		
Three Bedroom:	129		
Four Bedroom:	46		
Five Bedroom:	0		
Non-dwelling:	1		
Total Units:	504		

Development # 6			
Name of Public Housing Development:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Whitcomb Court	VA007000006	PBV	0
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund Allocation of Development:
491	Family	Family	\$1,564,230.00
Bedroom Type:	Number of Units Pre-conversion:	Number of Units Post-Conversion:	Change in Number of Units per Bedroom Type and Why:
Efficiency:	0	491	0
One Bedroom:	62		
Two Bedroom:	274		
Three Bedroom:	116		
Four Bedroom:	34		
Five Bedroom:	5		
Non-dwelling:	0		
Total Units:	491		

Development # 7			
Name of Public Housing Development:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Fairfield Court	VA007000007	PBV	0
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund Allocation of Development:
447	Family	Family	\$1,425,687.00
Bedroom Type:	Number of Units Pre-conversion:	Number of Units Post-Conversion:	Change in Number of Units per Bedroom Type and Why:
Efficiency:	0	447	0
One Bedroom:	61		
Two Bedroom:	222		
Three Bedroom:	111		
Four Bedroom:	46		
Five Bedroom	5		
Non-dwelling:	2		
Total Units:	447		

Exhibit B.2-4

Excerpt from HUD Notice H-2019-09, PIH 2019-23 (HA), Rev-4

1.6 Special Provisions Affecting Conversions to PBVs

C. 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 conversion². Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, Section 8(o)(4) of the 1937 Act and 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, HUD waives Section 8(o)(4) and 24 CFR § 982.201 to the extent necessary for this provision to apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR Part 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.
2. **Right to Return.** See Section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.
3. **Phase-in of Tenant Rent Increases.** If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10 percent or \$25, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of

the phase-in period at three years, five years or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this

² 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.

section “Calculated PBV TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1 (the first recertification following conversion), as illustrated below.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full Calculated PBV 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. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

4. **Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are currently FSS participants will continue to participate in the PHA’s FSS program.

The PHA may continue to use any FSS funds already awarded to serve those FSS

participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding. Due to the program merger between PH FSS and HCV FSS that took place

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

pursuant to the FY14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that until provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act are implemented, there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984 (current, or as amended), the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100⁴. Further, upon conversion to PBV, if the PHA no longer has a public housing program, funds already escrowed for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant⁵.

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

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

5. **Resident Participation and Funding.** In accordance with Attachment 1B, residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.
6. **Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the

required tenancy addendum (HUD Form 52530-c), as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

- a. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD and to non-RAD PBV
-

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.

⁵ Where the PHA maintains a public housing program, any forfeited funds that had been escrowed prior to conversion would revert to the PHA's Operating Reserves.

units located at the Covered Project. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter), the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:

- i. A reasonable period of time, but not to exceed 30 days:
 1. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 2. In the event of any drug-related or violent criminal activity or any felony conviction;
 - ii. Not less than 14 days in the case of nonpayment of rent; and
 - iii. 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.
- 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.

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

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v)⁶, 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.
 1. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
 2. For any additional hearings required under RAD, the Project Owner will perform the hearing.
- ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.
- iii. 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).

- iv. 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.

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

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

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

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 24 CFR § 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants that move into the property following conversion or tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

8. **Jobs Plus.** Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project. If the program is continued, the Project Owner must agree to continue to implement the program according to HUD's program requirements. Jobs Plus target public housing projects must enroll public housing residents into the Jobs Plus rent incentive, JPEID, prior to conversion. Any resident of the Covered Project that had not enrolled prior to conversion is not eligible to enroll in JPEID but may utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Covered Project may voluntarily utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion.

9. **When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA

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

Allowance, or (b) any applicable maximum rent under LIHTC regulations. During any period when the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice⁷. In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

Unless a waiver is requested and approved as described below, any new admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has left the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating units have been permitted, Section 1.6.B.10 of the Notice.

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

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

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

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV

projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

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

⁷ 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.

If the waiver is approved, the new admission[s] families covered under the waiver are participants under the program and all of the family obligations and protections under RAD and PBV apply to the family, and the unit is subject to all program requirements. Such waiver requests should be submitted to the PIH Field Office in accordance with Notice PIH 2018-16.

10. **Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the underoccupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR § 983.260 is waived for current residents remaining or returning to the Covered Project. MTW agencies may not modify this requirement. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

D. PBV: Other Miscellaneous Provisions

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 shall 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:
- 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 PBV program-wide or HCV program-wide waiting list.
 - c. 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.
 - 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.

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 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)⁸.

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

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision

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

8. **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 the following 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

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.

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.

1.7 Special Provisions Affecting Conversions to PBRA

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 conversion⁹. 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 units¹⁰.
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
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⁹ These protections (as well as all protections in this Notice for current households) apply when a household is relocated to facilitate repairs following conversion and subsequently returns to the Covered Project, even if they are considered a "new admission" upon return.

¹⁰ 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.

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 TTP¹¹.

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.

¹¹ For example, where a resident's most recently paid TTP is \$100, but the Calculated PBV TTP is \$200 and remains \$200 for the period of the resident's occupancy, (i.e. no changes in income) the resident would continue to pay the same rent and utilities for which it was responsible prior to conversion. At the first recertification following conversion, the resident's contribution would increase by 33% of \$100 to \$133. At the second AR, the resident's contribution would increase by 50% of the \$66 differential to the standard TPP, increasing to \$166. At the third AR, the resident's contribution would increase to \$200 and the resident would continue to pay the Calculated PBV TTP for the duration of their tenancy.

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 represented by another person of their choice, to ask questions of witnesses, have 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 the authority 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 regulations¹². 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.

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.

¹² 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. Accordingly, the Project Owner must charge this resident \$550, i.e., \$600 TTP, minus \$50 Utility Allowance.

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).¹³

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.

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 following¹⁴:

- 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

¹³ 5 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.

¹⁴ The Choice-Mobility requirements that apply to covered PBRA projects differ from the requirements that apply to covered PBV projects.

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.¹⁵
- 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:
 - 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
- 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.

¹⁵ The sponsoring agency must commit to the full term of the initial HAP Contract, must undergo a significant amendment to its Annual Plan (no later than 60 days after execution of the project's CHAP), and must comply with section 8(o)(6)(A) relating to selection preferences. In order to implement this incentive, HUD is waiving provisions under 24 CFR § 985.3(h) to provide donating agencies with bonus points under the SEMAP for deconcentration.

Exhibit B.2-5

HUD Notice H-2016-17, PIH-2016-17

RRHA here incorporates U.S. Department of Housing and Urban Development Notice H 2016-17, PIH 2016-17 (HA) into this Plan as if fully set forth herein.

RRHA will provide a complete copy of this Notice to any person upon request.

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Exhibit B.2-7

Project-based Vouchers

Property Name	Location	# of PBVs	Status	Type
Alexander at 1090 Apartments (2018)	Richmond	5	Leasing	Family
Apartments at Kingsridge (2016)	Henrico	18	Leasing	Family
Apartments at Kingsridge 2 (2018)	Henrico	8	Leasing	Family
Armstrong 1A	Richmond	15	Leasing	Family
Armstrong 1B	Richmond	45	Leasing	Senior 62+
Armstrong 2A	Richmond	17	Leasing	Family
Armstrong 2B	Richmond	45	Leasing	Senior 62+
Bickerstaff Crossing (2018)	Henrico	6	Leasing	Family
Cary West (2016)	Richmond	5	Leasing	Family
Glenwood Ridge (2016)	Richmond	20	Leasing	Family
Goodwyn at Union Hill (2016)	Richmond	6	Leasing	Family
New Clay House II (2016)	Richmond	20	Leasing	Family
South Richmond SRO	Richmond	60	Leasing	Family
Townes at River South	Richmond	15	Leasing	Family
The Planet/Cameo	Richmond	12	Leasing	Family
Watermark Gardens	Chesterfield	8	Leasing	Near Elderly 55+
Cool Lane Apartments	Richmond	86	Leasing	Family
Brook Villas	Henrico	9	Leasing	Family
Winchester Forest	Chesterfield	12	Leasing	Family
Brookland Park/Highland Terrace	Richmond	7	Leasing	Family
Lambert Landing I	Chester	7	Leasing	Family
Lambert Landing II	Chester	7	Leasing	Family
400 E. Grace Street	Richmond	68	Pending LIHTC	Senior/Disabled
Creighton Phase A	Richmond	21	Pending HAP	Family
Creighton Phase B	Richmond	18	Pending AHAP	Family
Creighton Phase C	Richmond	15	Pending LIHTC	Family
Colbrook Apartments	Chester	8	Pending AHAP	Family
Diamond District (Project Phase)	Richmond	27	Pending LIHTC	Family
Elmington	Richmond	46	Pending LIHTC	Family
Gilpin (First Build)	Richmond	14	Pending LIHTC	Family
St. Elizabeth Apartments	Richmond	14	Pending LIHTC	Family
TOTAL		664		
RAD FAM 1		82	Leasing	
RAD FAM 2		122	Leasing	
TOTAL		204		

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Exhibit C.1

Resident Advisory Board (RAB) Comments

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Exhibit C.2

Form HUD-50077-SL

*Certification by State or Local Officials of PHA Plans Consistency with the
Consolidated Plan*

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Exhibit C.3

Form HUD-50077-ST-HCV-HP

*PHA Certifications of Compliance with PHA Plan, Civil Rights, and
Related Laws and Regulations Including PHA Plan Elements that Have
Changed*

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Exhibit D.1

Family Attributes on RRHA Waiting Lists^{17 18}

Bedroom Size	# Families on Waiting List	Total # Families Reporting a Disability	# Families Reporting Hearing Disability	# Families Reporting Sight Disability	# Families Reporting Mobility Disability	# Families Reporting Multiple Disabilities
Housing Choice Voucher Waiting Lists						
2024 HCV Waiting List						
n/a	3650	369	20	37	260	52
Public Housing						
1	3876	395	50	100	306	456
2	525	46	5	5	13	23
3	70	2	0	0	1	1
4	156	48	2	2	9	13
5	69	16	0	1	7	8
Elderly						
1	1134	654	8	36	283	327
Blackwell Cottages						
1	528	302	3	15	133	151
TOTAL	6358	1463	68	159	752	979
Project-based Voucher Site Based Waiting Lists						
Kingsridge						
2	4021	4021	33	58	204	295
3	1103	1102	12	10	54	76
Kingsridge 2						
2	3587	3588	36	57	245	338
3	1022	1023	11	9	47	67
Alexander at 1090						
2	3014	3014	24	49	158	231
3	853	853	9	9	38	56
Cary West						
2	3391	3391	31	51	168	250
			Bickerstaff			
2	1340	1340	13	19	71	103
New Clay House						
1	1685	1697	25	55	226	336
Goodwyn						

Bedroom Size	# Families on Waiting List	Total # Families Reporting a Disability	# Families Reporting Hearing Disability	# Families Reporting Sight Disability	# Families Reporting Mobility Disability	# Families Reporting Multiple Disabilities
2	3402	3387	12	49	177	255
3	967	951	32	9	43	64
Armstrong 1a						
2	3540	3525	32	54	186	272
3	942	925	10	8	43	61
Armstrong 1b						
1	359	359	12	21	87	120
2	157	157	3	3	14	20
Armstrong 2a						
3	1790	1775	15	27	102	144
4	140	126	0	3	4	7
Armstrong 2b						
1	2443	2440	99	163	693	955
2	794	791	31	31	139	201
Glenwood Ridge						
1	3,041	3037	42	75	334	451
2	3,147	3141	27	47	156	230
3	1,103	1101	12	9	61	82
Richmond SRO						
1	649	650	11	21	95	127
Townes at River South						
3	1103	1101	14	13	50	77
4	270	268	3	5	15	23
The Planet/Cameo						
1	1921	1915	32	63	225	320
2	1639	1631	25	30	77	132
3	980	974	12	12	40	64
Watermark Gardens						
1	1024	1024	32	59	281	372
Cool Lane Apartments						
0	1371	1344	20	49	138	207
1	392	365	7	14	50	71
Brook Villas						
2	1904	1881	28	31	113	173
3	706	684	9	9	25	43
Winchester Forest						
1	3230	3227	22	100	373	495

Bedroom Size	# Families on Waiting List	Total # Families Reporting a Disability	# Families Reporting Hearing Disability	# Families Reporting Sight Disability	# Families Reporting Mobility Disability	# Families Reporting Multiple Disabilities
2	2371	2371	18	41	130	189
3	1508	1508	11	19	44	74
			Brookland Park/Highland Terrace			
1	1455	1323	18	36	155	209
2	1119	985	12	13	41	66
3	782	650	6	10	30	46
			Lambert Landing I			
2	1207	1033	11	12	46	69
3	920	744	7	9	32	48
			Lambert Landing II			
2	1214	1038	7	12	46	65
3	936	760	9	10	33	52
TOTAL	68952	67631	839	1390	5310	7539

RAD Waiting Lists						
Bedroom Size	# Families on Waiting List	Total # Families Reporting a Disability	# Families Reporting Hearing Disability	# Families Reporting Sight Disability	# Families Reporting Mobility Disability	# Families Reporting Multiple Disabilities
Richmond Family - Fulton						
2	2475	175	15	20	116	24
3	1077	69	8	9	37	15
4	141	12	1	0	10	1
5	35	3	0	0	3	0
Richmond Family - Stovall						
2	2079	163	13	24	105	21
3	636	54	6	0	38	10
4	143	11	1	3	6	1
Richmond Family - Randolph						
2	3243	288	21	36	199	32
3	1275	75	9	5	43	18
4	148	9	1	0	7	1
5	26	2	0	0	2	0
Richmond Family - Afton						
2	2442	344	18	23	131	172
3	850	90	8	4	33	45
4	125	18	1	0	8	9
5	24	4	0	0	2	2
Richmond Family - Bainbridge						
3	832	832	7	6	49	62

17 The information in this table is self-reported by each family and RRHA does not make any inquiries or - independent assessment about the veracity of any such self-reporting. Therefore, it is possible that at least some of the families who report having a disability do not, in fact, meet the necessary threshold under applicable law. 18 RRHA permits a family to apply for and be placed on multiple waiting lists. Therefore, it is possible that multiple entries on this table are all the same family.

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