U.S. Department of Housing and Urban Development

Office of Public and Indian Housing

Draft Public Housing Agency (PHA) Plan

Draft Annual Agency Plan for Fiscal Year 2027

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Chief Executive Officer

Date: June 12, 2026

Annual PHA Plan *(Standard PHAs and Troubled PHAs)*	**U.S. Department of Housing and Urban Development** **Office of Public and Indian Housing**	**OMB No. 2577-0226** **Expires: 9/30/2027**

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services. They also inform HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-, very low-, and extremely low- income families.

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form. Note: PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they closeout their Section 9 programs (ACC termination).

Definitions.

(1) ***High-Performer PHA*** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, or PHAS if only administering public housing.

(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.

(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.

(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.

(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.

(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or HCVs combined and is not PHAS or SEMAP troubled.

A.	**PHA Information.**

A.1

PHA Name: New York City Housing Authority **PHA Code**: NY005

PHA Type: ☑ Standard PHA ☐ Troubled PHA

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2027

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

Number of Public Housing (PH) Units 146,255 **Number of Housing Choice Vouchers (HCVs)** 110,304

Total Combined Units/Vouchers 256,559

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

Public Availability of Information. In addition to the items listed in this form, 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 and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans.

The Draft Annual Plan for FY 2027 is available for public inspection at NYCHA's principal office located at 90 Church Street, New York, NY between the hours of 9:30am to 4:30pm. Please email annualplancomments@nycha.nyc.gov to schedule a time to review the Plan.

The Draft Agency Annual Plan for FY 2027 is also available at the following locations:
• On NYCHA's webpage, which is located at:
https://www1.nyc.gov/site/nycha/about/annual-plan-financial-information.page
• At the Management Office of each NYCHA public housing development during regular business hours.

☐ **PHA Consortia**: (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Plan Elements

B.1 Revision of Existing PHA Plan Elements.

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

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

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

Please see Attachment A (PHA Plan Update)

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

Please see Attachment F (Admissions Policy for Deconcentration)

B.2 **New Activities.**

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

Y	N	
☐	☑	Choice Neighborhoods Grants.
☐	☑	Modernization or Development.
☑	☐	Demolition and/or Disposition.
☑	☐	Designated Housing for Elderly and/or Disabled Families.
☑	☐	Conversion of Public Housing to Tenant-Based Assistance.
☑	☐	Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
☑	☐	Homeownership Program under Section 32, 9 or 8(Y)
☑	☐	Occupancy by Over-Income Families.
☑	☐	Occupancy by Police Officers.
☐	☑	Non-Smoking Policies.
☑	☐	Project-Based Vouchers.
☑	☐	Units with Approved Vacancies for Modernization.
☐	☑	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

As of June 1, 2026, there are 1,537 units with approved vacancies for modernization. In FY 2027, NYCHA may require HUD approval for additional units to be vacant for modernization.

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

Please see Attachments B and C (Demolition and/or Disposition, Conversion of Public Housing, Homeownership, and Project-Based Vouchers and RAD, and Capital Improvements – Capital Fund Annual Statement).

As of March 1, 2026, NYCHA has executed 260 HAP contracts for 33,656 project-based units receiving subsidy across the five boroughs in New York City. This includes project-based apartments at NYCHA's LLC mixed-finance developments and PACT conversions.

B.3	**Progress Report.** Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. Please see Attachment E (Additional Information)

B.4 **Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.

NYCHA submitted the FY 2026 Plan and Five-Year Action Plan to HUD on April 7, 2026. The Plan was approved by HUD in EPIC on April 21, 2026.

B.5 **Most Recent Fiscal Year Audit**.

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

Y ☑ N ☐

(b) If yes, please describe:

As described in the Findings related to the Financial Statements Reported in accordance with Government Auditing Standards, the auditors identified two significant deficiencies in internal control over financial reporting (2024-001A, 2024-001B) as follows:
• Finding Number 2024-001A, the Authority did not adequately accrue transactions related to capital invoices received after year end, resulting in an understatement of both capital assets and accrued liabilities.
• Finding Number 2024-001B, the Authority inappropriately capitalized expenses related to GASB 49, resulting in an overstatement of capital asset balances.

As described in the Schedule of Findings and Questioned Costs relating to Federal Awards of the Single Audit Report, the Authority did not comply with certain requirements regarding Assistance Listing No. 14.850 Public and Indian Housing (2024-001, 2024-002) as follows:

• Finding number 2024-001 for Special Tests and Provisions – Environmental Contaminants Testing and Remediation has been categorized as a material deficiency in compliance and is a recurring finding. Finding number 2024-002 for Eligibility has been categorized as a low-grade compliance deficiency and is a recurring finding. During the Single Audit, Deloitte noted that the Authority did not ensure that all required eligibility forms were included in case files (10 of the 540 eligibility forms requested could not be located).

As described in the Schedule of Findings and Questioned Costs relating to Federal Awards of the Single Audit Report, the Authority did not comply with certain requirements regarding Assistance Listing No. 14.871 Section 8 Housing Choice Vouchers (2024-003, 2024-004) as follows:

• Finding number 2024-003 for Eligibility which has been categorized as a significant compliance deficiency. During the Single Audit, Deloitte noted that the Authority did not ensure that all required eligibility forms were obtained from the tenants and included in the case files. Of the sixty (60) case files selected for testing in which 600 pieces of audit evidence were requested to provided. Thirty-three eligibility forms related to five cases, were not provided.

• Finding number 2024-004 for Special Performance which has been categorized as a low-grade compliance deficiency. During the Single Audit, Deloitte noted the Authority did not ensure that all required critical information for HUD-50058 forms were obtained from the tenants and included in the case files. Of the sixty (60) case files selected for testing in which 540 pieces of audit evidence were requested to be provided. Eight (8) documents related to HUD-50058 forms were not provided.

C. Other Document and/or Certification Requirements.

C.1 **Resident Advisory Board (RAB) Comments.**

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

Y ☐ N ☐

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

C.2	**Certification by State or Local Officials.** Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	**Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** 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,* must be submitted by the PHA as an electronic attachment to the PHA Plan.
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? Y ☐ N ☐ (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? Y ☐ N ☐ N/A ☑ (b) If yes, please describe:

Supporting Documents Available for Review

Members of the public wishing to examine the Supporting Documents may do so, during regular business hours, by contacting NYCHA's central office, located at 90 Church Street, New York, New York, at (212) 306-3123 or by emailing annualplancomments@nycha.nyc.gov to schedule an appointment to review the documents.

List of Supporting Documents Available for Local Review **(*Applicable to All PHA Plan Types*)** Indicate which documents are available for public review by placing a mark in the "Applicable & On Display" column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.		
Applicable & On Display	**Supporting Document**	**Applicable Plan Component**
X	Form HUD-50077, *Standard PHA Certifications of Compliance with the PHA Plans and Related Regulations*: *Board Resolution to Accompany the Standard Annual, Standard Five-Year, and Streamlined Five-Year/Annual PHA Plans*.	5-Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5-Year and Annual Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement.	5-Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments (AI) to Fair Housing Choice); and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan (TSAP) and the Site-Based Waiting List Procedure. *The following Management and Maintenance Policies are available and on display:* *Public Housing Maintenance and Management:* □ *NYCHA Admissions and Continued Occupancy Policy (ACOP)* □ *NYCHA Management Manual* □ *NYCHA Application and Tenancy Administration Manual*	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Deconcentration Income Analysis *NYCHA's Deconcentration Income Analysis begins on page 220 of the Draft Annual Plan.*	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Any policy governing occupancy of Police Officers and Over-Income Tenants in Public Housing. ☒ Check here if included in the public housing A&O Policy. *NYCHA's policy governing the occupancy of Police Officers is available in NYCHA's Management Manual in Chapter III, NYCHA's Standard Procedure SP003011 and on page 50 of the Draft Annual Plan.*	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents. ☒ Check here if included in the public housing A & O Policy.	Annual Plan: Rent Determination

List of Supporting Documents Available for Local Review (*Applicable to All PHA Plan Types*) Indicate which documents are available for public review by placing a mark in the "Applicable & On Display" column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.		
Applicable & On Display	**Supporting Document**	**Applicable Plan Component**
	NYCHA's rent determination policies are available on page 57 of the Draft Annual Plan. Information is also available in the Admissions and Continued Occupancy Policy (ACOP) on NYCHA's website - Admissions and Continued Occupancy Policy	
X	Schedule of flat rents offered at each public housing development. ☐ Check here if included in the public housing A & O Policy. *NYCHA's Flat Rent schedule is on page 59 of the Draft Annual Plan. Information is also available in the Admissions and Continued Occupancy Policy (ACOP) on NYCHA's website - Admissions and Continued Occupancy Policy*	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies (if included in plan, not necessary as a supporting document) and written analysis of Section 8 payment standard policies. ☒ Check here if included in the Section 8 Administrative Plan. *Section 8 rent determination (payment standard) policies are outlined in Chapter IX of the Section 8 Administrative Plan and on page 60 of the Draft Annual Plan.*	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation).	Annual Plan: Operations and Maintenance
X	Results of latest Public Housing Assessment System (PHAS) assessment	Annual Plan: Operations and Maintenance
X	Results of latest Section 8 Management Assessment System (SEMAP).	Annual Plan: Operations and Maintenance
X	Any policies governing any Section 8 special housing types ☒ Check here if included in Section 8 Administrative Plan. *Section 8 special housing types are outlined in Chapter XV (B) of the Section 8 Administrative Plan.*	Annual Plan: Management and Operations
X	Public housing grievance procedures ☒ Check here if included in the public housing A & O Policy. *NYCHA's grievance procedures are outlined in the Admissions and Continued Occupancy Policy (ACOP) on NYCHA's website - Admissions and Continued Occupancy Policy*	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures ☒ Check here if included in Section 8 Administrative Plan. *NYCHA's informal review and hearing procedures are outlined in Chapter XXIV (B) of the Section 8 Administrative Plan.*	Annual Plan: Grievance Procedures
X	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement/Performance and Evaluation Report (form HUD-52837) for the active grant year	Annual Plan: Capital Needs
X	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
X	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
X	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
X	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act, Section 22 of the U.S. Housing Act of 1937, or Section 33 of the U.S. Housing Act of 1937.	Annual Plan: Conversion of Public Housing

List of Supporting Documents Available for Local Review (*Applicable to All PHA Plan Types*) Indicate which documents are available for public review by placing a mark in the "Applicable & On Display" column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.		
Applicable & On Display	**Supporting Document**	**Applicable Plan Component**
X	Documentation for required Initial Assessment and any additional information required by HUD for Voluntary Conversion. *Please see page 118 of the Draft Annual Plan for information on the Voluntary Conversion of NYCHA's public housing.*	Annual Plan: Voluntary Conversion of Public Housing
X	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
N/A	Policies governing any Section 8 Homeownership program *NYCHA does not have a Section 8 Homeownership program at this time.*	Annual Plan: Homeownership
X	Public Housing Community Service Policy/Programs ☒ Check here if included in the public housing A & O Policy. *NYCHA's Community Service Policy is outlined in the Draft Annual Plan beginning on page 227. Information is also available in the Admissions and Continued Occupancy Policy (ACOP) on NYCHA's website - Admissions and Continued Occupancy Policy*	Annual Plan: Community Service & Self-Sufficiency
X	Cooperative agreement between the PHA and the TANF agency and between the PHA and local employment and training service agencies.	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8.	Annual Plan: Community Service & Self-Sufficiency
X	Section 3 documentation required by 24 CFR Part 135, Subpart E for public housing.	Annual Plan: Community Service & Self-Sufficiency
X	Most recent self-sufficiency ROSS or other resident services grant) grant program reports for public housing.	Annual Plan: Community Service & Self-Sufficiency
X	Policy on Ownership of Pets in Public Housing Family Developments (as required by regulation at 24 CFR Part 960, Subpart G). ☒ Check here if included in the public housing A & O Policy. *NYCHA's Policy on Ownership of Pets in Public Housing Family Developments is outlined in the Draft Annual Plan beginning on page 95. Information is also available in the Admissions and Continued Occupancy Policy (ACOP) on NYCHA's website - Admissions and Continued Occupancy Policy*	Annual Plan: Pet Policy
X	The results of the most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U. S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
X	Other supporting documents (optional) *New York Police Department Housing Bureau Strategic Plan*	Annual Plan: Safety and Crime Prevention

Public Hearing Notice

NYCHA's Fiscal Year 2027 Draft Annual Plan will be available for public inspection starting June 12, 2026, on NYCHA's website: on.nyc.gov/nycha-annual-plan. The plan will also be available at every development management office. The Executive Summary will be available on NYCHA's website in English, Spanish, Chinese, and Russian. Please email annualplancomments@nycha.nyc.gov if you would like to review the supporting documents.

The public is invited to comment on the plan at a public hearing on **Wednesday, July 29, 2026, from 5:30 p.m. to 8:00 p.m. at The Theater at City Tech (285 Jay Street in Downtown Brooklyn)**.

The public hearing will be held as a hybrid meeting, so attendees can participate in person or virtually.

Attending the hearing virtually (Zoom or phone): Instructions on how to participate, as well as meeting materials, will be posted before the meeting.

Interpretation services will be available on Zoom in Spanish, Mandarin, Cantonese, Russian, and American Sign Language.

Attending the hearing in person: Anyone wishing to speak on the items related to the plan can fill out a speaker slip upon arrival at the venue. All speakers are asked to limit their remarks to two minutes.

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

You can also provide written comments about the plan. **Submissions must be received by August 1, 2026**. Comments can be faxed to 212-306-8888, mailed to the following address, or emailed to annualplancomments@nycha.nyc.gov.

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

Requests for reasonable accommodations should be made by July 22, 2026, by emailing **annualplancomments@nycha.nyc.gov** or calling **212-306-3335**.

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

Aviso de audiencia pública

El borrador del Plan Anual del Año Fiscal 2027 de NYCHA estará disponible para inspección pública a partir del 12 de junio de 2026 en la página web de NYCHA: on.nyc.gov/nycha-annual-plan. El plan también estará disponible en la oficina administrativa de cada residencial. El resumen ejecutivo estará disponible en la página web de NYCHA en inglés, español, chino y ruso. Por favor, escriba a annualplancomments@nycha.nyc.gov si desea revisar los documentos de respaldo.

Se invita al público a comentar sobre el plan en una audiencia pública el **miércoles 29 de julio de 2026, de 5:30 p.m. a 8:00 p.m., en The Theater at City Tech (285 Jay Street en Downtown Brooklyn).**

La audiencia pública se llevará a cabo como una reunión híbrida; así, los asistentes podrán participar en persona o de forma virtual.

Asistencia a la audiencia de forma virtual (Zoom o teléfono): Las instrucciones sobre cómo participar, al igual que los materiales de la reunión, se publicarán antes de la misma.

Habrá **servicios de interpretación** en Zoom en español, mandarín, cantonés, ruso y lenguaje de señas estadounidense.

Asistencia a la audiencia en persona: Cualquier persona que desee hablar sobre los puntos relacionados con el plan puede llenar una boleta de participación al llegar al lugar. Se pide a todos los participantes que limiten sus comentarios a dos minutos.

La reunión también se puede seguir en directo en la página web de NYCHA o, una vez finalizada, a través de una grabación disponible en la misma página web: on.nyc.gov/nycha-annual-plan.

También puede enviar comentarios por escrito sobre el plan. **Los comentarios deben recibirse antes del 1 de agosto de 2026.** Los comentarios pueden enviarse por fax al 212-306-8888, por correo postal a la siguiente dirección, o por correo electrónico a annualplancomments@nycha.nyc.gov.

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Las solicitudes de adaptaciones razonables deben hacerse antes del 22 de julio de 2026, escribiendo a **annualplancomments@nycha.nyc.gov** o llamando al **212-306-3335**.

Уведомление об общественном слушании

Проект Годового плана NYCHA на 2027 финансовый год (FY) будет доступен, начиная с 12 июня 2026 года, для публичного ознакомления на вебсайте NYCHA: on.nyc.gov/nycha-annual-plan. Этот план будет также доступен в офисах управления каждого жилкомплекса. Краткий обзор будет доступен на вебсайте NYCHA на английском, испанском, китайском и русском языках. Пожалуйста, отправьте имейл по адресу annualplancomments@nycha.nyc.gov, если вы хотите просмотреть сопутствующие документы.

Общественность приглашается предоставить комментарии по поводу плана на публичном слушании, которое состоится в **среду, 29 июля 2026 года, с 17:30 до 20:00 в Театре City Tech (285 Jay Street в центре Бруклина)**.

Публичное слушание будет проводиться как гибридное собрание, поэтому участвовать можно очно или виртуально.

Виртуальное посещение слушания (Zoom или телефон): Инструкции по участию, а также материалы собрания будут опубликованы до его проведения.

Услуги устного перевода будут доступны в Zoom на испанский, русский, китайский (пекинский и кантонский диалекты) языки и американский язык жестов.

Очное посещение слушания: Любой, кто желает выступить по вопросам, связанным с планом, может заполнить регистрационный листок выступающего по прибытии на место проведения слушания. Всех выступающих просят ограничить свое выступление двумя минутами.

Собрание можно будет также посмотреть в прямом эфире на вебсайте NYCHA или после завершения слушания в записи на вебсайте: on.nyc.gov/nycha-annual-plan.

Вы также можете подать письменные комментарии по поводу плана. **Комментарии должны быть получены до 1 августа 2026 г.** Комментарии принимаются по факсу: 212-306-8888, по почте (адрес указан ниже) или имейлу: annualplancomments@nycha.nyc.gov.

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Church Street Station
P.O. Box 3422
New York, New York 10008-3422

Запросы на приемлемую аккомодацию (reasonable accommodation) должны быть отправлены до 22 июля 2026 г. по имейлу **annualplancomments@nycha.nyc.gov** или поданы по тел. **212-306-3335**.

公共聽證會通知

紐約市房屋局(NYCHA) 將於 2026 年 6 月 12 日通過其網站公佈 「2027 財政年度年度計劃」初稿供公眾查閱，網址: on.nyc.gov/nycha-annual-plan。各住宅區管理處辦公室也將提供計劃的文件。NYCHA網站將提供 「行政概述」的英文，西班牙文，中文和俄文版本。如需查閱計劃書的輔助文件，請發送電郵至: annualplancomments@nycha.nyc.gov 。

謹此誠邀公眾參加NYCHA於 **2026 年 7 月 29 日，星期三，下午 5 時 30 分至晚上 8 時在紐約市立大學 City Tech 城市科技學院劇院 (布魯克林商業中心區傑伊街 285 號)** 舉行的公開聽證會，對計劃書提出建議和意見.

公共聽證會將以混合模式進行，與會者可選擇前往現場或遠程參加會議。

遠程參加聽證會 (通過Zoom或電話): 關於參加會議的方法，以及會議資料將於會議前公佈。

通過Zoom軟件召開的網絡會議將提供西班牙語，普通話，廣東話，俄語和美國手語**傳譯服務。**

參加現場聽證會: 希望對機構計劃的相關內容發表意見的人士可於到達會場時填寫發言人登記表。所有發言者的發言時間將被限制在兩分鐘內。

公眾還可通過NYCHA網站觀看會議直播或在會議結束後觀看錄影，網址：on.nyc.gov/nycha-annual-plan。

您還可對機構計劃提供書面意見。**請於2026年8月1日之前提交意見書**，並可將意見書傳真至: 212- 306-8888，郵寄至下列地址，或發送電郵至: annualplancomments@nycha.nyc.gov.

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

如果需要合理便利安排, 請於2026年7月22日之前通過電郵: **annualplancomments@nycha.nyc.gov** 或致電: **212-306-3335** 提出申請。

公共听证会通知

纽约市房屋局（NYCHA）将于2026年6月12日通过其网站公布「2027财政年度年度计划」初稿供公众查阅，网址： on.nyc.gov/nycha-annual-plan。 各住宅区管理处办公室也将提供计划的文件。 NYCHA网站将提供 「行政概述」的英文，西班牙语，中文和俄文版本。 如需查阅计划书的辅助文件，请发送电邮至： annualplancomments@nycha.nyc.gov 。

谨此诚邀公众参加NYCHA于 **2026 年7月29日，星期三，下午5时30分至晚上8时在纽约市立大学City Tech城市科技学院剧院（布鲁克林商业中心区杰伊街285号）** 举行的公开听证会，对计划书提出建议和意见.

公共听证会将以混合模式进行，与会者可选择前往现场或远程参加会议。

远程参加听证会 （通过Zoom或电话）： 关于参加会议的方法，以及会议资料将于会议前公布。

通过Zoom软件召开的网络会议将提供西班牙语，普通话，广东话，俄语和美国手语传**译服务。**

参加现场听证会：希望对机构计划的相关内容发表意见的人士可于到达会场时填写发言人登记表。 所有发言者的发言时间将被限制在两分钟内。

公众还可通过NYCHA网站观看会议直播或在会议结束后观看录像，网址：
on.nyc.gov/nycha-annual-plan。

您还可对机构计划提供书面意见。 **请于2026年8月1日之前提交意见书**，并可将意见书传真至：212- 306-8888，邮寄至下列地址，或发送电邮至： annualplancomments@nycha.nyc.gov.

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如果需要合理便利安排，请于2026年7月22日之前通过电邮：
annualplancomments@nycha.nyc.gov 或致电： **212-306-3335** 提出申请。

NYCHA's Fiscal Year 2027 Draft Annual Plan

The Fiscal Year 2027 Draft Annual Plan is available for public inspection starting June 12, 2026, on NYCHA's website: on.nyc.gov/nycha-annual-plan. The Draft Annual Plan will also be available at the management office of every NYCHA public housing development during regular business hours.

The public is invited to comment on this plan at a public hearing on **Wednesday, July 29, 2026, from 5:30 p.m. to 8:00 p.m. at The Theater at City Tech (285 Jay Street in Downtown Brooklyn)**.

The public hearing will be held as a hybrid meeting, so attendees can participate in person or virtually.

To read the plan, or for full details about how to attend the public hearing in person or virtually, visit **on.nyc.gov/nycha-annual-plan** or scan the **QR code**. The public hearing can also be viewed live, or after the meeting through a recording, at this link.

To attend the meeting by phone, dial 646-558-8656 at the time of the hearing and enter 886 3849 5370 as the meeting code. You can also register for the Zoom meeting at on.nyc.gov/annual-plan-zoom-webinar

Interpretation services will be available on Zoom in Spanish, Mandarin, Cantonese, Russian, and American Sign Language. Those attending by phone who require foreign language interpretation may dial 646-558-8656 and the following ID numbers at the time of the hearing for live interpretation: Spanish: 331 425 8640#, Mandarin: 461 857 9342#, Cantonese: 848 608 3704#, Russian: 804 869 1448#.

Attending the hearing in person: Anyone wishing to speak on the items related to the plan can fill out a speaker slip upon arrival at the venue. All speakers are asked to limit their remarks to two minutes.

Requests for reasonable accommodations should be made by **July 22, 2026**, by emailing annualplancomments@nycha.nyc.gov or calling 212-306-3335.

Borrador del Plan Anual de NYCHA para el año fiscal 2027

El Borrador del Plan Anual para el año fiscal 2027estará disponible para su consulta pública a partir del 12 de junio de 2026 en el sitio web de NYCHA: on.nyc.gov/nycha-annual-plan. El Borrador del Plan también estará disponible en la oficina de administración de cada residencial de vivienda pública de NYCHA durante horas regulares de trabajo.

Se invita al público a expresar sus opiniones sobre este plan en una audiencia pública que tendrá lugar el **miércoles, 29 de julio de 2026, de 5:30 p.m. a 8:00 p.m. en el Teatro de City Tech (285 Jay Street, en el centro de Brooklyn)**.

La audiencia pública se llevará a cabo como una reunión híbrida, por lo que los asistentes pueden participar en persona o virtualmente.

Para leer el plan o conocer todos los detalles sobre cómo asistir a la audiencia pública en persona o virtualmente, visite **on.nyc.gov/nycha-annual-plan** o escanee el código QR. La audiencia pública también puede verse en directo, o después de la reunión a través de una grabación, en este enlace.

Para participar en la reunión por teléfono, marque el 646-558-8656 a la hora de la audiencia e introduzca el código de la reunión: 886 3849 5370. También puede inscribirse en la reunión de Zoom en on.nyc.gov/annual-plan-zoom-webinar.

Los servicios de interpretación estarán disponibles en Zoom en español, mandarín, cantonés, ruso y lenguaje de señas estadounidense. Las personas que asistan por teléfono que requieran interpretación en un idioma extranjero pueden marcar el 646-558-8656 y los siguientes números de identificación en el momento de la audiencia para interpretación en vivo: español: 331 425 8640#, mandarín: 461 857 9342#, cantonés: 848 608 3704#, ruso: 804 869 1448#

Asistir a la audiencia en persona: Quien desee intervenir sobre los puntos relacionados con el plan puede completar una ficha de intervención al llegar al recinto. Se pide a todos los oradores que limiten sus observaciones a dos minutos.

Las solicitudes de adaptaciones razonables deben hacerse antes del **22 de julio de 2026**, enviando un correo electrónico annualplancomments@nycha.nyc.gov o llamando al 212-306-3335.

Проект Годового плана NYCHA на 2027 финансовый год

Проект Годового плана NYCHA на 2027 финансовый год будет доступен для публичного ознакомления с 12 июня 2026 года на веб-сайте NYCHA: on.nyc.gov/nycha-annual-plan. Проект Годового плана также будет доступен в офисе управления каждого жилкомплекса NYCHA в обычные рабочие часы.

Общественность приглашается предоставить комментарии по поводу этого плана на публичном слушании, которое состоится в **среду, 29 июля 2026 года, с 17:30 до 20:00 в театре City Tech (285 Jay Street в Downtown Brooklyn)**.

Публичное слушание будет проводиться как гибридное собрание, поэтому участвовать можно очно или виртуально.

Чтобы ознакомиться с планом или получить полную информацию о том, как принять участие в публичном слушании очно или виртуально, посетите сайт **on.nyc.gov/nycha-annual-plan** или отсканируйте QR-код. Публичное слушание также можно будет посмотреть в прямом эфире или после собрания в записи по этой ссылке.

Для участия по телефону наберите во время слушания 646-558-8656 и введите 886 3849 5370 в качестве кода собрания. Вы также можете зарегистрироваться для участия в Zoom на сайте on.nyc.gov/annual-plan-zoom-webinar.

Услуги устного перевода будут доступны в Zoom на испанский, русский, китайский (пекинский и кантонский диалекты) языки и американский язык жестов. Принимающие участие в слушании по телефону и нуждающиеся в переводческих услугах жильцы могут позвонить во время слушания по тел. 646-558-8656 и набрать следующие ID: испанский: 331 425 8640#, китайский (пекинский диалект): 461 857 9342#, китайский (кантонский диалект): 848 608 3704#, русский: 804 869 1448#

Для участия в слушании очно: Любой, кто желает выступить по вопросам, связанным с планом, может заполнить регистрационный листок выступающего по прибытии на место проведения слушания. Всех выступающих просят ограничить свое выступление двумя минутами.

Запросы на приемлемую модификацию должны быть отправлены до **22 июля 2026 г.** по имейлу: annualplancomments@nycha.nyc.gov или поданы по тел. 212-306-3335.

纽约市房屋局「2027财政年度计划」初稿

纽约市房屋局 (NYCHA) 的《2027财政年度计划》初稿将于 2026 年 6 月 12 日起在 NYCHA 网站公布，欢迎公众查阅，网址：on.nyc.gov/nycha-annual-plan。 NYCHA 辖下各公共房屋住宅区管理处办公室亦备有《年度计划》初稿，欢迎公众于正常办公时间前往查阅。

现诚邀公众参加NYCHA举办的公众听证会，对该计划提出意见。听证会将于 **2026年7月29日（星期三）下午5时30分至晚上8时，在纽约市立大学城市科技学院剧院（布鲁克林市中心 Jay街285号）**举行。

本次公众听证会将以混合方式举行，与会者可选择到场参加或线上参加。

如需阅读计划内容，或了解如何到场或线上参加公众听证会的完整信息，请浏览 on.nyc.gov/nycha-annual-plan 或扫描二维码。 公众亦可通过以下链接观看听证会直播，或于会议结束后观看会议录像。

如想通过电话参加会议，请在听证会举行时拨打 646-558-8656，并输入会议代码：886 3849 5370。 您也可登录 on.nyc.gov/annual-plan-zoom-webinar 报名参加 Zoom 网络会议。

Zoom 会议将提供西班牙语、普通话、广东话、俄语和美国手语翻译服务。 通过电话参加会议且需要外语传译服务的人士，可在听证会开始时拨打 646-558-8656，并输入以下相应语言代码，使用实时传译服务：西班牙语：331 425 8640#，普通话：461 857 9342#，广东话：848 608 3704#，俄语：804 869 1448 #

现场参加听证会: 任何希望对该计划相关事项发言的人士，可于到达会场后填写发言登记表。 请每位发言人将发言时间控制在两分钟以内。

如果需要合理便利措施安排，请于 **2026 年 7 月 22 日** 前通过电邮: annualplancomments@nycha.nyc.gov 或电话: 212-306-3335 提出申请。

紐約市房屋局「2027財政年度計劃」初稿

紐約市房屋局 (NYCHA) 的《2027 財政年度計劃》初稿將於 2026 年 6 月 12 日起在 NYCHA 網站公佈，歡迎公眾查閱，網址：on.nyc.gov/nycha-annual-plan。NYCHA 轄下各公共房屋住宅區管理處辦公室亦備有《年度計劃》初稿，歡迎公眾於正常辦公時間前往查閱。

現誠邀公眾參加 NYCHA 舉辦的公眾聽證會，對該計劃提出意見。聽證會將於 **2026 年 7 月 29 日（星期三）下午 5 時 30 分至晚上 8 時，在紐約市立大學城市科技學院劇院（布魯克林市中心 Jay 街 285 號）**舉行。

本次公眾聽證會將以混合方式舉行，與會者可選擇到場參加或線上參加。

如需閱讀計劃內容，或了解如何到場或線上參加公眾聽證會的完整資訊，請瀏覽 **on.nyc.gov/nycha-annual-plan** 或掃描二維碼。公眾亦可通過以下連結觀看聽證會直播，或於會議結束後觀看會議錄像。

如想通過電話參加會議，請在聽證會舉行時撥打 646-558-8656，並輸入會議代碼：886 3849 5370。您也可登錄 on.nyc.gov/annual-plan-zoom-webinar 報名參加 Zoom 網絡會議。

Zoom 會議將提供西班牙語、普通話、廣東話、俄語和美國手語翻譯服務。通過電話參加會議且需要外語傳譯服務的人士，可在聽證會開始時撥打 646-558-8656，並輸入以下相應語言代碼，使用即時傳譯服務：西班牙語：331 425 8640#，普通話：461 857 9342#，廣東話：848 608 3704#，俄語：804 869 1448 #

現場參加聽證會：任何希望對該計劃相關事項發言的人士，可於到達會場後填寫發言登記表。請每位發言人將發言時間控制在兩分鐘以內。

如果需要合理便利措施安排，請於 **2026 年 7 月 22 日**前通過電郵: annualplancomments@nycha.nyc.gov 或電話: 212-306-3335 提出申請。

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Executive Summary
NYCHA's Draft Agency Plan for FY 2027

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

The Draft Agency Plan for Fiscal Year 2027 will be available for public review on NYCHA's website: on.nyc.gov/nycha-annual-plan. NYCHA will also provide a copy of the Draft Agency Plan to each development's Resident Association President. The Draft Plan will also be made available at the management office of every NYCHA public housing development during regular business hours. NYCHA will hold a hybrid in-person and virtual public hearing on July 29, 2026, and will accept written comments on the Draft Agency Plan through August 1, 2026 (please see the notices starting on page 13 for more information). NYCHA met with the Resident Advisory Board members for their comments in 6 meetings from March to June 2026.

NYCHA's Final Agency Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) by October 18, 2026. Following NYCHA's submission, HUD has 75 days to review and approve the plan.

NYCHA's priorities for the coming year are outlined on pages 24 through 42. NYCHA aims to strengthen its business model through its Transformation Plan and raise much-needed capital funding for its developments through the NYC Public Housing Preservation Trust, Permanent Affordability Commitment Together (PACT) initiative, and other preservation programs. In January 2019, NYCHA and the City of New York signed an Agreement with HUD, which outlined specific deadlines and objective compliance standards for making significant improvements in several high-priority areas, including lead-based paint, mold, heat, elevators, annual inspections, pests, and waste management. NYCHA is committed to achieving these deadlines, and updates for each of these high-priority areas are highlighted below. With NYCHA's capital projects work, the Authority is investing in projects outlined in its City Capital Action Plan, initiatives that are already underway, and projects focused on environmental resiliency and sustainability. Finally, NYCHA continues to pursue other initiatives that fund vital building and apartment upgrades.

The City's Support for NYCHA

NYCHA is a central part of the Mamdani administration's recently released housing plan, "Block by Block: A Housing Plan for a New Era." Over the next four years and beyond, NYCHA will play an essential role in not only stewarding the City's existing affordable housing, but also in creating new housing opportunities for current residents and other low-income New Yorkers. As laid out in the housing plan, NYCHA is focusing on programs and new initiatives to improve and expand upon its work within three core areas: addressing major capital needs and supporting effective operations that are accountable to resident experiences and participation, delivering deep capital reinvestment and positioning NYCHA and the Trust as 21st century stewards of publicly owned housing, and supporting economic mobility for NYCHA residents.

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

NYCHA's **Transformation Plan** is a top-to-bottom reorganization of NYCHA, with proposed strategies for restructuring NYCHA's business model and operations to improve the delivery of services to residents.

Transformation Plan and NYCHA's Monitoring Agreement

On January 31, 2019, NYCHA and the City of New York signed an Agreement with HUD. The Agreement's overarching goal is to remedy the deficient physical conditions in NYCHA properties to benefit residents across the city. It establishes a foundation to continue strengthening the Authority and improving residents' quality of life. The Agreement sets performance targets in seven high priority areas: lead-based paint, mold, heat, elevators, inspections, pests, and waste management. The work undertaken as part of the Agreement is overseen by an independent federal Monitor. The term of NYCHA's first federal Monitor, Guidepost Solutions, ended in February 2024, and NYCHA's new federal Monitor for a second five-year term is the law firm Jenner & Block. The Agreement's requirements continue under the new Monitor.

Efforts under the Agreement include, for instance, conducting visual assessments and completing interim controls and abatements for lead-based paint each calendar year, improving the response times for heat and elevator outages, completing capital improvements to replace aging boilers and elevators, remediating mold conditions and preventing mold recurrence, utilizing Integrated Pest Management practices to reduce pest populations, collecting waste on time, and performing annual apartment inspections. The Agreement also required an "Organizational Plan" to "achieve sustained compliance with [the] obligations under [the] Agreement."

NYCHA issued three documents in response to this Agreement obligation — the Transformation Plan, issued in March 2021, followed by two Implementation Plans, issued in February 2022 and February 2023. Together, the Transformation Plan and the two Implementation Plans comprise the Organizational Plan required under the HUD Agreement.[1] The plans include a set of strategies designed to improve the resident experience and set the agency on a path to a stronger future.
In the first years after the release of the Plan, NYCHA implemented key changes to NYCHA's operating model, as well as numerous business process improvements that focus on service delivery pain points identified by residents and employees. Early changes included a reorganization of NYCHA's management structure, a full overhaul of our repair and work order management process, the launch of monthly Borough STAT meetings, and the creation of the Resident Round Table.

More recently, NYCHA has launched annual performance reviews for managerial employees, trained property managers on budgeting, designed and tested a risk register for capital projects, launched ongoing trainings for vendors on ethics and responsibility, and created a pre-qualified list for micro vendors, among other accomplishments. Additionally, NYCHA plans to open a new heating training facility in our Long Island City office in Q3 of 2026, and we have started work on establishing data governance for the various systems used across NYCHA.

[1] The Organizational Plan was subsequently amended with the issuance of a Chair Memorandum and QA Memorandum.

NYC Public Housing Preservation Trust

In June 2022, the State legislature passed a bill establishing the New York City Public Housing Preservation Trust (the Trust), and it was signed into law by Governor Kathy Hochul. Under current state law, NYCHA can transfer a maximum of 25,000 apartments to the Trust to dramatically improve residents' quality of life through comprehensive building renovations while preserving their rights and protections (including permanently affordable rent) and providing economic opportunities. NYCHA will continue to own and manage the properties, entering into a long-term ground lease with the Trust to secure Project-Based Section 8 vouchers, which have a subsidy worth more than NYCHA's current federal Section 9 subsidy. Similar to how other government entities raise funding for capital improvements, the Trust will pursue conventional financing or bonds that fund comprehensive building renovations.

Since 2023, resident votes have taken place at several developments following extensive engagement periods that include outreach, education, and opportunities for residents to ask questions and provide feedback. Transfers to the Trust only occur following a resident vote, where households choose between joining the Trust, converting through the Permanent Affordability Commitment Together (PACT) program, or remaining in the Section 9 program. Voting is conducted through a secure, third-party administrator and includes multiple methods of participation, including mail, online, and in-person voting.

Residents from Nostrand Houses, Bronx River Addition, Unity Towers (also known as Coney Island (Site 1B)), and Hylan Houses each voted to join the Trust following this process, representing the first cohort of developments to select the Trust model for comprehensive renovation. Residents at Coney Island Houses, Throggs Neck Addition, and Isaacs Houses voted to remain in the Section 9 program, while Randall-Balcom elected to convert through the PACT program. Additional resident votes are expected to continue at developments across the portfolio.

Following Trust selection, the developments have advanced into procurement for selection of design-build partners, after which projects move into design and construction, alongside implementation of the Section 8 lease conversion process.

Nostrand Houses
At Nostrand Houses, a design-build partner was selected in July 2025, and the project is advancing through the design phase in coordination with residents, the Trust, and NYCHA. The Section 8 lease signing process began in January 2026, following a Draft Trust Lease public comment period held in July–August 2025. Construction is anticipated to begin in Fall 2026 through a phased approach.

Bronx River Addition
At Bronx River Addition, a design-build partner was selected in September 2025, and the project is progressing through design. Construction is anticipated to start in late 2026. Additionally, a draft Trust Lease public comment period was held in July - August 2025, and the Trust and NYCHA are starting the Section 8 lease signing process in June 2026.

Unity Towers (also known as Coney Island I (Site 1B))
At Unity Towers, shortlisted firms were issued an RFP in October 2025, and proposals were due in

March 2026. The Trust selected a design-build partner in June 2026. The design-build team partner will start design and resident engagement in Summer 2026.

Additionally, a Draft Trust Lease public comment period was conducted in January–February 2026.

Hylan Houses

At Hylan Houses, shortlisted firms were issued an RFP in February 2026 and proposals were due in April. The Trust selected a design-build partner in May 2026. This project will be the first to use a progressive design-build (PDB) delivery approach, one of the delivery mechanisms available to the Trust to support efficient project delivery and early collaboration during design. The design-build team partner will start design and resident engagement in Summer 2026.

Additionally, a draft Trust Lease public comment period was conducted in January–February 2026.

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

Leveraging New Sources of Revenue to Preserve Homes and Renovate Buildings

Considering the multibillion-dollar decline in federal Section 9 funding and massive repair needs across its portfolio, NYCHA must pursue innovative ways to fund the building and apartment upgrades that residents deserve. NYCHA's 2023 Physical Needs Assessment (PNA) estimates 20-year physical needs of $78.3 billion, which is a 73 percent increase from the 2017 PNA's total estimated needs of $45.3 billion.

As part of its Permanent Affordability Commitment Together (PACT) initiative, NYCHA will address overdue repairs in 62,000 apartments – a third of its units and home to approximately 140,000 New Yorkers. PACT relies on partnerships with private and non-profit development partners and converts developments to a more stable, federally funded program called Project-Based Section 8 through federal mechanisms such as RAD and the Section 18 program.

NYCHA will enter into public-private partnerships to undertake the major improvements to public housing developments while preserving long-term affordability and maintaining strong resident rights in line with public housing protections. To date, NYCHA has closed on financing over $10 billion for capital repairs across the city. Over 32,000 apartments have converted to Project-Based Section 8 and over 13,000 apartments are in the planning and engagement phase of the program. NYCHA has made significant progress towards our goal of 62,000 apartments in the past several years.

All apartments that convert to Section 8 funding under RAD will remain permanently affordable. The Project-Based Section 8 program provides a more stable flow of federal subsidy and allows NYCHA and its development partners or the Preservation Trust to raise external financing to address a development's capital repair needs. By converting through the RAD program, resident rights and protections are preserved. Authorized residents will only pay up to 30 percent of their household income towards rent, will not have their household applications re-screened, and will have the right to return to an assisted unit at the project if relocated during the construction or renovations.

The PACT and Trust programs allow NYCHA to reinvest in, restore, and rebuild publicly controlled affordable housing in a way that reflects the priorities of the communities they serve. The PACT program has provided residents with new kitchens, bathrooms, windows, and common areas while addressing critical repairs to elevators, boilers, roofs, and façades. Both programs also require enhanced on-site social services by funding valuable community programming catered to meet the needs of each development.

Through PACT, over $3 billion in renovations have been completed at more than 15,000 apartments. An additional 16,859 apartments are under construction, totaling over $6.9 billion in major upgrades. An additional 13,538 apartments are part of active development projects in the process of resident engagement or pre-development. In sum, NYCHA has over 45,000 apartments completed, in construction, or in a stage of resident engagement or pre-development through PACT.

The Trust Program currently has 1,776 units in the planning and pre-development phase, representing $800 million in capital repairs.

Infill, Redevelopment, and Other Tools:
By leveraging its real estate assets, NYCHA can redevelop underused land to raise funding for building rehabilitation, build new housing for NYCHA residents, or completely redevelop a NYCHA campus. Building on underutilized land can be done as a standalone transaction or in connection with other tools like PACT and the transfer of air rights, Transfer of Assistance as defined below, and using Project-Based Vouchers. Proceeds generated by these transactions will be used to reinvest in, restore, or rebuild existing NYCHA campuses.

New residential buildings can be subject to Mandatory Inclusionary Housing (MIH) levels of affordability and increase the permanently affordable housing stock. NYCHA continues to tap into its extensive unused development rights, known as “air rights,” in order to raise revenue for the Authority. By transferring a portion of the Authority’s approximately unused 80 million square feet of air rights, NYCHA expects to generate funding for capital repairs at adjacent developments which generated the air rights that were transferred. The sale of unused transferable development rights to owners of privately owned sites has already generated $55 million in revenue to pay for capital repairs at NYCHA developments. In 2020, NYCHA completed two air rights transfers, one at Ingersoll Houses in Brooklyn for nearly $25 million and another at Hobbs Court in Manhattan for $2.6 million. In 2022, NYCHA completed a sale at Manhattanville Houses for $28 million. In 2024, NYCHA completed another sale at Campos Plaza for $19 million, for a total of $74 million in proceeds for capital repairs for the adjacent developments. In 2025, NYCHA leveraged a tool called “Transfer of Assistance” under HUD’s Rental Assistance Demonstration (RAD) program to offer new apartments to NYCHA residents in a residential building to be constructed on a privately owned parcel of land adjacent to Howard Houses in Brooklyn. Under Transfer of Assistance, subsidy for a certain number of units at Howard Houses will be transferred to the newly constructed building, providing the NYCHA residents of such units the opportunity to move to the new building as Section 8 residents under RAD. NYCHA will utilize Transfer of Assistance on additional projects in 2026 and beyond to expand housing opportunities for NYCHA residents and increase the number of affordable housing units.

Commitments to Build New 100% Affordable Housing

New York City is confronting an affordable housing crisis, and New Yorkers have called for more affordable housing. NYCHA has pledged to provide underused land (such as parking lots and storage spaces) for the creation of new, affordable apartments for both families and seniors.

NYCHA has closed on 19 transactions located in the Bronx, Brooklyn, Manhattan, and Queens. To date, 2,623 affordable apartments have been built or are under construction. An additional 72 co-op homeownership units began construction at the end of 2020 and welcomed home first-time home buyers in 2024. All units have been leased.

Many of these buildings will include community facilities and neighborhood retail that will serve new and current residents. For instance, The Atrium at Sumner in Bedford-Stuyvesant features 130 studio apartments and 59 one-bedroom apartments, as well as one two-bedroom superintendent apartment. The 11-story building is organized around a central atrium with corridors overlooking a year-round indoor garden on the ground floor. The Atrium at Sumner is designed to Passive House Standards, resulting in 60 to 70 percent less energy consumption compared to the average New York City apartment building. Its common areas include an exercise room as well as a library, conference rooms, and a large multi-purpose room that will be home to educational and arts classes and programming to meet the needs of seniors. The building started to welcome residents in 2024, with a subset of units with a preference at initial lease up for existing NYCHA seniors.

A Culture of Compliance

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

Compliance Pillar Areas

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

The Agreement goals, as well as other priority areas, are outlined in the Goals Section of the Draft Agency Plan (pages 195 to 216). The following text includes examples of progress in Compliance pillar areas to date, as well as anticipated future progress.

Lead-Based Paint

In April 2019, NYCHA kicked off an unprecedented effort to test approximately 134,000 apartments for the presence of lead-based paint using an x-ray fluorescence (XRF) analyzer. The XRF testing initiative was initially based on the definition of lead-based paint being 1.0 milligram per square centimeter (mg/cm^2). NYCHA attempted to test 119,161 units (89% of the target universe of 134,000 units) and completed tests in 108,236 units (81% of the target universe) using this standard. On December 1, 2021, the New York City Department of Housing Preservation and Development (HPD) issued a regulation changing the definition of lead-based paint from paint with lead content measured at 1.0 mg/cm^2 to paint with lead content measured at 0.5 mg/cm^2 for purposes of New York City's Local Law 1. When the City changed its standard, NYCHA suspended its program to test units at 1.0 mg/cm^2 and pivoted to retest high priority units at the new and lower threshold of 0.5 mg/cm^2 (0.5 Standard). The high priority units included units that were occupied by a child under 6 (CU6), units that never received XRF testing before at the 1.0 mg/cm^2 (1.0 Standard), or units that have previously tested positive at the 1.0 Standard. As of January 2024, testing has expanded to include all NYCHA pre-1978 apartments, both CU6 and non-CU6, at the 0.5 Standard. The total 0.5 Standard testing universe is 147,184 units. As of October 2025, NYCHA successfully attempted all units within the 0.5 Standard XRF testing universe. As of March 1, 2026, NYCHA successfully completed XRF testing in 137,803 (94%) units. Of these units, 61,899 (45%) are positive for lead-based paint. NYCHA will continue to pursue testing at the 0.5 Standard in the remaining units.

Additionally, NYCHA annually notifies residents to identify units where children under 6 years old live or spend 10 or more hours a week as required under New York City's Local Law 1 so that these units can remain a focus of lead-based paint response, as described below. In cases where residents fail to respond to the notice, NYCHA conducts door-to-door visits to identify units with CU6. This initiative is ongoing as NYCHA continues its efforts to identify units where CU6 either reside or spend more than 10 hours per week.

The 2024 biennial risk assessment project began in July, and all the field work has been completed. A follow-up risk assessment started in July 2025. NYCHA has intensified its efforts to address deteriorated paint conditions in units with confirmed or presumed positive lead-based paint where a CU6 lives or spends ten or more hours per week. The 2026 Biennial Risk Assessment Project is expected to begin in June 2026. The Biennial Risk Assessment Follow Up Project will begin in 2027. Moreover, as of December 2021, NYCHA expanded its abatement efforts to comply with the City's lowered lead-based paint threshold of 0.5 mg/cm^2. Following testing at the new lower standard, NYCHA issues abatement work orders for positive units and offers expedited abatement services if residents agree to temporary relocation from both CU6 and non-CU6 apartments.

NYCHA is currently working with a project management firm, inclusive of case managers, who oversee the lead-based paint abatements at NYCHA developments as well as temporary resident relocation during the abatement process. As March 1, 2026, NYCHA completed lead abatements in 18,165 units. NYCHA is continuing its efforts with lead abatements in units citywide.

Under the PACT program, NYCHA requires the PACT partner to test the units and common areas of buildings built prior to 1978 for lead-based paint. Based on this testing, the PACT partner must develop a plan to abate all lead-based paint. The PACT partner then completes the required abatement as part of their scope of work and reports on progress to NYCHA.

From January 2019 to May 1, 2026, the PACT program has converted 26,981 units with 6,865 units expected to need abatement (6,321 of those units were tested at the City's 2021 standard). As of May 1, 2026, PACT partners reported that 4,644 units have been abated of lead-based paint, approximately 68% of the units. Of the 4,644 abated units, 4,202 units were abated at the City's new standard. PACT partners are also performing abatement in the common areas of the converted developments.

Mold

NYCHA established the Office of Mold Assessment and Remediation (OMAR) in July 2018 and the Compliance Department in 2019 in response to the 2018 *Baez* Amended Consent Decree and the 2019 HUD Agreement, to manage the Authority's response to mold and leaks. OMAR, under the Healthy Homes Division, is a specialized team that has launched various initiatives in recent years to address mold, leak, and ventilation issues. These efforts include the development/implementation of new standard procedures, Authority-wide ventilation improvements, using data to drive mold and leak compliance, and backlog reduction initiatives.

Development/Implementation of New Standard Procedures

From January through September 2019, NYCHA rolled out the *Mold/Mildew Control in NYCHA Residential Buildings Standard Procedure*. In July 2021, NYCHA published the *Roof Fan Inspections at NYCHA Residential Buildings Standard Procedure*, which provided staff guidance for monthly preventive maintenance roof fan inspections to address any ventilation issues. In June 2024, NYCHA published an updated mold standard procedure and is currently working to update its related training course accordingly. In May 2025, NYCHA finalized and published the *Leak and Excessive Moisture Control in NYCHA Residential Buildings Standard Procedure* (Leak SP). The Leak SP establishes a consistent approach to addressing leaks and excessive moisture in residential buildings, aligning with compliance requirements and operational best practices. The initiative is currently being rolled out, which includes staff training, IT system upgrades, and performance monitoring. As of March 23, 2026, the Leak SP has gone live at 18 consolidated developments in Queens-Staten Island (100% of the Q/SI portfolio) and 17 consolidated developments in Brooklyn.

Authority-Wide Ventilation Improvements

In 2020, NYCHA began its roof fan replacement efforts and in May 2022, reached its milestone to replace or retain 8,436 roof fans. NYCHA began labeling the fans with their Maximo assets to link the monthly inspections on the handheld devices to Maximo assets in the system. Additionally, in 2020, NYCHA began the Clean Vents Initiative (CVI), its in-unit vent cleaning project, and completed CVI by finishing the third round of attempts to perform vent cleaning by July 31, 2023. As part of CVI, NYCHA cleaned lateral ducts in approximately 74,000 residential units. In June 2023, NYCHA launched its multi-year initiative to replace approximately 95,000 vents, including in-unit dampers and hallway dampers. As of March 26, 2026, a total of 38,149 dampers have been installed, representing 41% of the total target installations.

Using Data Analysis to Drive Mold and Leak Compliance

In May 2022, NYCHA introduced and continues to use the Mold and Leak Performance Scorecard and Dashboard and the Enhanced Oversight Program (EOP)[2] to identify and assist NYCHA consolidations in need of additional support to improve compliance with court-ordered mold and leak performance parameters. The Scorecard measures the mold and leaks performance of consolidations based on 11 key metrics. As part of the EOP, OMAR works with lower-performing consolidations to identify and address key areas of non-compliance through weekly check-ins with property management and skilled trades staff, and provides additional support through the deployment of specialized teams to address priority work orders, order verification, and additional training. Furthermore, OMAR utilizes its in-house and seasonal teams to assist NYCHA Operations with addressing the high-priority work order backlog through the Mold Inspection Initiative (MII), Mold Cleaning Initiative (MCI), and Mold Painting Initiative.

In August 2025, NYCHA launched Mold and Leaks Restore and Renew (MLRR), a $20 million 2-year investment in a new skilled trades team to address leak and mold work orders open for 100 days or more. As of April 2026, OMAR currently has one EOP site and three MLRR programs in progress. EOP and MLRR operate under the same structure - both involve the same stakeholders and monitoring through a weekly coordination meeting. Historically, EOP sites were selected based on high inspections backlog and significant cleaning and mold-resistant paint needs. Over the past three years, these backlogs have declined, making it difficult to identify new sites using the original criteria. The barrier now observed across consolidations is the backlog of skilled trades work orders. MLRR provides the same strategic support as EOP but adds a dedicated skilled trades team to support the repair backlog associated with aging mold and leak work orders. Teams are deployed to high-need sites for approximately two to three months.

Additional Backlog Reduction Efforts

In May 2022, NYCHA launched Operation Mold Clean Up (OMC) to reduce the backlog of open mold removal and mold-resistant paint work orders which remove the hazardous conditions. As of March 16, 2026, NYCHA completed 93% (or 34,550 out of 37,093) of work orders identified for closure as part of this initiative. In April 2023, NYCHA launched Operation Dry Out (ODO) to reduce the backlog of aging tub enclosure and plumbing work orders related to mold and leak complaints. This work is considered root cause work which addresses the underlining issue that's causing a mold and/or leak condition. As of March 16, 2026, 71% (7,202) of identified tub enclosure work orders and 83% (10,027) of identified plumbing work orders have been completed.

In June 2024, to reduce its mold and leak work order backlog and improve staff efficiency, NYCHA, in partnership with the Ombudsperson Call Center (OCC), launched its Work Order Verification Project. The program conducted resident outreach by emails and phone calls to identify and close aged mold and leak work orders that no longer required work. As of March 23, 2026, the OCC has connected with residents for 20,002 work orders (WO) – 60.5% (5,837 WOs) were verified as "still needed" and were escalated for scheduling, and 33.8% (3,261 WOs) were verified as "no longer needed" and escalated for administrative closure.

Finally, to address some of its oldest mold and leak work orders, in March 2025, NYCHA launched Operation Backlog Busters targeting child work orders associated with mold inspections created in

[2] The EOP was launched in partnership with Independent Data Analyst (Stout) and Independent Mold Analyst (Microecologies).

2019 and 2020. This effort concluded on November 20, 2025, and upon completion, NYCHA closed 72% (234 out of 325) of work orders identified, with 95% (310) having been attempted.

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

- Reduce the backlog of mold and leaks skilled trade work orders
- Decrease mold incidence and recurrence
- Improve compliance related to key performance parameters, including time to complete initial inspections, mold removal, remediation, and related repairs
- Ensure that key staff are trained in mold inspections and remediation.
- Train staff on the enhanced leak inspection process with the new Leak SP.

Despite these efforts, NYCHA understands that substantial, comprehensive capital investments will be necessary to effectively address the root causes of mold. Sustained investment and completed capital upgrades will be crucial in addition to the more immediate operational and maintenance work already underway. The ongoing mold and moisture problems in NYCHA buildings are indicative of the capital problems that have been postponed for so long, as well as the lack of reinvestment that all buildings need. Many of NYCHA's buildings are more than a half century old and have not received the required capital improvements vital to their infrastructure. To address the factors that have led to mold growth, leaks, and moisture complaints, NYCHA must invest in the comprehensive modernization of all its properties with chronic mold and leak problems across its entire portfolio.

Heat

In the 2025-2026 heat season, NYCHA resolved its heat outages on average in 7.2 hours. 99% of outages (645 out of 653) were resolved within 24 hours. NYCHA continues to utilize a heating team dedicated to resolving service interruptions 24/7 and continues to activate a "Situation Room" during periods of extreme cold to coordinate the response to interruptions and mobilization of resources in real time. NYCHA continuously monitors outage data through the use of dashboards and reports to identify issues proactively. NYCHA also reviews the causes of outages to identify system components that may require extensive repair and/or replacement. NYCHA then uses this data to develop an operational investment strategy that uses operating dollars to make the identified repairs.

Since the HUD Agreement was signed in 2019, NYCHA has replaced 211 boilers at 55 developments. At certain of those and another 17 developments, NYCHA has ongoing, active projects to replace another 96 boilers, with a total of 308 forecasted to complete construction by the end of 2026. These projects are funded through a range of sources, including City capital dollars (including funds allocated pursuant to the City Capital Action Plan), State capital dollars, Sandy Recovery and Resilience funding, and federal capital funds, among others.

The goal to repair or replace 200 boilers through PACT by end of 2026 had previously been met. As of October 2025, NYCHA has repaired or replaced 261 boilers through the Permanent Affordability Commitment Together (PACT) Section 8 conversion program.

Elevators

NYCHA continues to strive to make improvements to its elevator operations. NYCHA continues to hire and train additional elevator mechanic teams while investing in air conditioners in motor rooms, door lock monitors, and other equipment that will help improve elevator service.

Since the HUD Agreement was signed in 2019, construction has been completed at 288 elevators across 25 developments. An additional 11 elevators are being addressed through projects which are in the construction phase, with a total of 299 elevators forecasted to complete construction by the end of 2026.

The PACT goal had been previously achieved. As of October 2025, 280 elevators have already been transferred to third-party management through the PACT Section 8 conversion program

Additional updates include:

- Installing air conditioners in motor rooms to reduce overheating equipment. As of September 2025, 2,229 air conditioners have been installed and are operational. No new air conditioners have been installed since September.
- Upgrading to Master Operator Variable Frequency (MOVFR) waterproof door operators to help prevent weather-related outages. As of September 2025, 364 water-resistant operators have been installed. No new MOVFRs have been installed.
- NYCHA's Elevator Services Repair Department (ESRD) has installed Electric Voltage Regulators (EVR) to increase voltage at select developments during summer months. This equipment will help prevent "no service conditions" in senior buildings when the local utility company lowers voltage to prevent blackouts.
- As of September 2025, 13 EVR units have been installed and signed off by the New York City Department of Buildings (DOB), 4 are currently in progress. In addition, the Elevator Department has asked NYCHA's Capital Projects team to include EVRs on all future modernizations.

Pests and Waste Management

NYCHA has substantially reduced the backlog of extermination work orders that had grown due to COVID restrictions, exterminator vacancies, and repeat infestations. In January 2023, there were 16,762 open work orders as compared to April 2026 with 7,061 open extermination work orders, a reduction of 58% in the open work orders. These work orders are not backlogged but represent the volume for about two weeks of work. NYCHA had 50 pest management vacancies in January 2023 and currently has 21, which are being filled in collaboration with NYCHA's Office of Resident Economic Empowerment & Sustainability (REES), which has offered three exterminator training courses for residents. The final factor leading to reduced tickets is an increase in the quality of work. Exterminators now use vacuums, seal holes, use more targeted pesticides, have better training, and make follow-up visits. These efforts have helped NYCHA to meet or substantially meet response times laid out in the HUD Agreement: (a) respond to 90% of all rat complaints within 2 business days and to all rat complaints within 5 days, and (b) respond to 90% of mice, bedbug, and roach complaints within 7 days and to all complaints within 10 days. The current average response time in 2026 through April for resident complaints for rats is 1.3 days and 2.9 days for the other pests (mice, roaches, and bedbugs).

NYCHA is using City Capital Action Plan (CCAP) funds to replace most interior and exterior compactors that are past their useful lifespans. These funds provide for the replacement and room restoration of 1,211 interior compactors and the redesign of approximately 120 waste yards. These changes will provide significant improvements in equipment and working conditions for NYCHA staff to handle waste and recyclables.

- As of April 1, 2026, 603 interior compactor rooms have been completed, with new interior compactor units and related improvements. An additional 594 compactor rooms are in procurement, design, or planning.
- As of April 1, 2026, 8 waste yards with exterior auger compactors and other equipment are completed, and an additional 15 are under construction, 64 are in procurement, and 24 are in design.

National Standards for the Physical Inspection of Real Estate (NSPIRE) and Annual Public Housing Apartment Inspections

As of March 2026, NYCHA completed the following key activities:

- As of January 1, 2024, and continuing in 2025 and 2026, NYCHA's procedure is to inspect 100% of public housing apartments per year.
- Updated the NSPIRE Standard Procedure (SP) to include new National Standards for the Physical Inspection of Real Estate (NSPIRE) requirements and other updates. The SP was issued on February 15, 2024.
- Updated the Annual Apartment Inspections SP to include inspecting 100% of apartments per year, new NSPIRE requirements, and other updates. The SP was issued on September 4, 2024. The SP is further being updated as of March 2026.
- Continue NYCHA staff training consisting of two days of classroom sessions as well as a half-day session in the field. The training launched in October 2023.
- As of March 4, 2026, 1,666 staff completed classroom training and 1,324 staff completed site-based training, 974 staff completed NSPIRE readiness annual refresher training.
- Updated Maximo Work Order for annual apartment inspections to automate deferral of minor repairs.
- NYCHA continues to improve resident engagement and communications regarding NSPIRE and Annual Apartment Inspections and holds several informational sessions with residents.
- Continued to improve NSPIRE performance and scores
- Continued to improve completion rate for annual apartment inspections
- Continued to improve completion rate for supervisory inspections of buildings and grounds, and skilled trades

Capital Projects

At the beginning of 2026, NYCHA's Asset and Capital Management (A&CM) Department had 399 active projects with a total budget of $6.6 billion funded over the next five years. Over the course

of 2026, A&CM is targeting to expend over $1 billion of capital funds across NYCHA's capital programs and complete construction on over 120 projects.

These programs include:

- Heating system replacements or upgrades, including in-kind boiler replacements, decoupling of space and domestic hot water systems, decentralized gas and geothermal systems, and heat pumps
- Elevator system modernizations
- Roof replacements
- Waste management infrastructure upgrades, including interior and exterior compactors and new waste yards
- Comprehensive modernization
- Building exterior improvements, including façade restorations and window upgrades.
- Safety and security, including CCTV, layered access control doors, and lighting
- Flood damage remediation and mitigation, including Sandy recovery and resilience work
- Energy efficiency and weatherization upgrades
- Grounds upgrades, including playgrounds, sports courts, and green infrastructure
- Common area renovations, including lobbies, and community, senior, and daycare center

Progress on several of these programs – as well as NYCHA's work on innovation pilots, community partnerships, and Connected Communities initiatives – are further explored below.
In 2026, A&CM is anticipating securing more than $350 million in sustainability and resiliency-related grants, including Federal disaster recovery funding related to Ida storm damage remediation and mitigation, as well as securing $4.5 million in grants for third-party-implemented capital projects on NYCHA sites.

Looking ahead, the 5-year Capital Plan allocates an additional $1.4 billion of federal funds and $2.1 billion of City funds in 2026 through 2030 for capital projects managed by A&CM, or over $700 million per year on average. Much of this funding will continue to be invested in HUD Agreement Pillar areas, including heating systems, elevators, waste management infrastructure, and comprehensive modernization, as well as roofs and façade restoration. These investments underscore NYCHA's commitment to bringing our properties up to a state of good repair, improving residents' quality of life, strengthening sustainability and resilience to climate change.

Recovery & Resilience Programs

NYCHA has invested over $3.1 billion in funding from FEMA, Community Development Block Grant Disaster Recovery (CDBG-DR), and insurance proceeds at the 35 developments most severely impacted by Superstorm Sandy. Completed work includes 52 new boilers providing heat and hot water to almost 3,483 units in 43 buildings, 187 roofs replaced, 164 full-power backup generators operational with 110 turned over to serve over 15,621 apartments in 173 buildings, and storm surge protection installation at 25 developments protecting over 163 buildings, which are now ready for the 2026 hurricane season. All but one of the remaining projects will be completed in 2026.

NYCHA secured approximately $170 million in CDBG-DR funding related to Hurricane Ida, which took place in September 2021, and continues to work with FEMA to finalize an approximately $600M public assistance award to comprehensively restore properties damaged by the storm and mitigate damages in future floods. NYCHA has identified major damage at 13 NYCHA developments

management, which are the focus of this recovery program. FEMA has obligated program funding for 11 of the 13 properties, with two properties awaiting obligation. In coordination with the FEMA program, the NY State Division of Homeland Security and Emergency Services has committed $30M in local match funds, which will support additional mitigation measures. NYCHA has also worked with the PACT program to provide $51 million of CDBG-DR funding to Hope Gardens and Bushwick Houses, two former NYCHA developments now in the PACT program which suffered major and unprecedented rain-driven flooding during Hurricane Ida and in subsequent rain events. Construction at these properties is 80% complete.

More broadly, NYCHA is implementing its 2021 Climate Adaptation Plan, through projects that increase resilience to the three greatest climate-induced threats to New York City residents: extreme heat, coastal flooding, and extreme rain. NYCHA continues to identify resiliency needs, actively seeks federal and State grant funding to address them and is implementing capital projects to protect the portfolio and NYCHA residents from damages and losses due to climate events. New grant programs sponsored by NY State have provided approximately $20M in funds to support the construction of NYCHA stormwater management projects. NYCHA is also working to integrate resiliency needs into its pipeline of capital work, including exploring a process for reviewing projects for consistency with the City's Climate Resiliency Design Guidelines beginning in 2027. Further efforts to coordinate the resiliency program with other NYCHA priorities include ongoing cooperation with PACT partners planning conversions at properties with existing climate threats, as well as seeking opportunities to join resiliency and electrification goals into holistically planned property improvements.

Energy-Efficiency Programs

In 2026, NYCHA released a Sustainability Agenda which outlines its commitment to healthy and comfortable homes that also reflect environmental stewardship and sustainable design. There are currently $341 million in active and complete Energy Performance Contracts, and $42.2 million in weatherization upgrades are completed or in construction. In August 2022, NYCHA, in collaboration with the New York Power Authority and New York State Energy Research and Development Authority, selected two vendors, Midea America and Gradient, to develop affordable cold-climate window-packaged heat pumps. The two vendors' products were initially piloted in 2023 at 24 apartments at Woodside Houses and evaluated for 12 months. In 2025, NYCHA scaled this installation of heat pump units in a full building at Woodside and is installing new energy efficient windows to pair with the heat pumps. Additionally, NYCHA has identified six developments that can convert to this new heating system. Three developments in the PACT program, Bay View, Campos Plaza II, and Wilson, have incorporated window heat pumps into their projects, making them the largest electrification projects at NYCHA to-date. Installation of heat pumps across NYCHA's section 9 portfolio and PACT projects will progress NYCHA's commitment to install 30,000 of these new heat pumps by 2030.

NYCHA also committed to host 30 megawatts (MW) of renewable energy on public housing and PACT roofs by 2026. As of September 2025, a total of 6.8 MW of community shared solar have been installed. An additional 16.3 MW of solar installations are in design or construction, with 2 more MW of solar awarded, pending lease signature. 2.9 MW of the remaining 5 MW have been solicited and proposals are under review.

Comprehensive Modernization Program

The Comprehensive Modernization program integrates comprehensive renovations spanning multiple building systems, interiors and exteriors, and grounds improvements at several developments. This will allow these developments to be comprehensively renovated more quickly, at a higher quality, and with better value. This approach also holistically addresses the HUD Agreement pillar areas and the broader needs of residents and reduces NYCHA's comparatively high operations and maintenance costs.

Four projects with a total budget of over $1 billion, are underway in design and construction: Saint Nicholas Houses, Todt Hill Houses, Gowanus Houses, and Wyckoff Gardens. These projects are being delivered using a design-build project delivery method and involve extensive resident engagement from early on in each project, including hundreds of meetings, vision sessions at each property, thousands of flyers, on-site engagement offices, and individual apartment canvassing. This ensures residents' voices are central to the renovation process. The design-builders are actively working at all four sites.

Innovation Pilots

In 2025, A&CM developed and/or managed the following innovation pilots, which are continuing in 2026:

- **Entryways:** Analyzed and evaluated NYCHA's 30-year-old storefront standard, piloted a new standard with aluminum, steel-reinforced entrance doors with large glass panels for improved visibility across five pilot sites, and finalized the new standard based on the pilot feedback and evaluation.
- **Window Heat Pumps:** In partnership with the New York State Energy Research & Development Authority (NYSERDA) and the New York Power Authority (NYPA), engaged HVAC manufacturers to develop and pilot a unitary, packaged cold climate air-source heat pump (ASHP) intended to be easily installed through an existing window and not require major electric upgrades. The pilot occurred at Woodside Houses, with the long-term goal of purchasing 30,000 heat pumps to install in 10,000 apartments. The initial pilot is complete and the heat pumps were installed in one full building in March 2026. Project planning is underway for the installation of heat pump units at six developments.
- **Clean Energy Academy:** Connects resident trainees to NYCHA's energy efficiency and renewable energy projects at NYCHA developments, customizing the training curriculum to contractor needs. NYCHA and the Public Housing Community Fund have graduated more than 100 public housing residents through the Clean Energy Academy to date. The Public Housing Community Fund trained 3 cohorts of residents in 2025, and 3 more cohorts are in progress or planned for 2026.
- **Green Infrastructure:** NYCHA is designing and constructing deeper green infrastructure retrofits to mitigate the impact of intense rain events, also called cloudburst events, at four developments to make these properties more resilient in the face of climate change while improving open space for residents.
- **Recycling Stations:** NYCHA is piloting larger capacity and more conveniently located recycling and trash stations at multiple sites with the goal of improving the resident recycling experience, minimizing material handling for staff, and increasing the capture of recyclable material.

- **Electric Vehicle Charging**: NYCHA is exploring conversion through a Request for Expressions of Interest to convert underutilized parking spaces to EV charging spaces to provide revenue to host properties and increase access to EV charging across New York City.
- **Induction Stove Challenge**: With NYPA and NYSERDA, NYCHA issued a manufacturer challenge to replace its gas stoves with an affordable, retrofit-friendly electric induction stove that runs on 120 volts and uses either smart controls, battery integration, or a combination to eliminate the need for major electrical infrastructure upgrades. Pending a successful pilot demonstration of the proposed unit, NYCHA will purchase approximately 10,000 new stoves from the selected manufacturer. Copper has signed an agreement with NYPA as the challenge awardee, and development of the new stove has begun.

Community Partnerships & Connected Communities

NYC implemented design and construction across play areas at six NYCHA developments as part of its "Walk to a Park" initiative and will maintain and operate the renovated open spaces in accordance with an agreement between NYCHA and the City of New York acting through NYC Parks. Renovations at Pomonok, Redfern, 1471 Watson Avenue, Sotomayor, Woodside Houses and Kingsborough are complete.

As a part of the Mayor's Action Plan program, the NYC Office of Neighborhood Safety, in partnership with the Center for Justice Innovation, completed construction of a new fitness area at Butler Houses in Fall 2025, and are planning open space projects at Tilden, Whitman, Mitchel and Wyckoff Gardens, to be implemented by late 2026. These projects are part of numerous tactical investments in the built environment aimed at enhancing safety across 30 high-crime NYCHA developments.

In addition, through the Connected Communities program, NYCHA has partnered with the Public Housing Community Fund to accept multiple philanthropic grants to improve open spaces at NYCHA. After a preliminary grant in 2019, the Helmsley Charitable Trust awarded an additional three-year $3.2 million grant in 2022 for participatory design-led open space transformation across four developments — Patterson, Castle Hill, Roosevelt, and Marlboro Houses. The site selection was informed by climate vulnerability, health and crime indicators, and resident leadership capacity. Construction at Castle Hill Houses was completed in spring 2025, with the addition of NYCHA's first-ever dog park and a new BBQ area as part of the program. Construction at Patterson Houses was completed in summer 2025, including the renovation of two playgrounds, the addition of a new fitness area, and the renovation of a basketball court. The project at Roosevelt Houses is currently in construction and will introduce multiple seating plazas across the development, with completion anticipated by Fall 2026. Marlboro Houses is currently in procurement, with construction anticipated to be completed by the end of 2026.

In August 2023, the Mellon Foundation approved a $2 million grant for the restoration of a historic artwork at Kingsborough Houses – a Works Progress Administration (WPA) 80-foot-long frieze on a freestanding wall, *Exodus and Dance*. The restoration was completed and celebrated with the community in August 2025. The project has since received multiple awards recognizing its exceptional preservation and design, including a 2026 AIANY Design Award, a MASterworks Award from the Municipal Arts Society, the Lucy G. Moses Award from the New York Landmarks Conservancy, and the 2025 Excellence in Historic Preservation Award from the Preservation League of New York State. In addition to the frieze restoration, the Mellon grant at Kingsborough Houses

also supported a broader cultural initiative, including an artist-in-residence program, an oral history project, the creation of a community mural, and the installation of NYCHA's first-ever heritage walk. In November 2023, the Mellon Foundation approved and granted $3 million to pilot a three-year artist-in-residency program across five NYCHA community centers with the NYC Department of Youth and Community Development (DYCD). NYCHA and the Public Housing Community Fund (PHCF) are collaborating with NYC's Public Design Commission (PDC) for this effort to lean on their expertise of citywide arts-based initiatives. PHCF secured $3.6 million in philanthropic funding from the Pershing Square Foundation to support an intergenerational open space transformation at Harborview Terrace. Construction is currently underway, with completion anticipated by Summer 2026.

Additionally, PHCF has secured $1.3 million in Congressional funding for two open space projects: a sensory garden and playground at Morrisania Air Rights in the Bronx, designed to meet the critical need for a neurodivergent-inclusive space in the community, and a splash pad renovation at Pomonok Houses. Both projects are currently in design, with groundbreaking anticipated in Fall 2026.

NYCHA continues to support other nonprofit investments of over $1.5 million into smaller open space interventions. *Opening the Edge* at Wald Houses, a plaza developed by the Economic Development Corporation (EDC) in partnership with the Design Trust for Public Space, was completed in November 2025. Landscaping and activation programming are planned for Summer 2026.

Capital Improvements – FY 2026 Capital Fund Annual Statement/Performance and Evaluation Report and Five-Year 2026-2030 Action Plan

On May 12 and May 13, 2026, NYCHA presented an overview of the Authority's Capital Planning Program and the FY 2026 Capital Plan and Five-Year 2026-2030 Action Plan to the Resident Advisory Board (RAB).

NYCHA's FY 2026 Capital Fund Annual Statement/Performance and Evaluation Report and Five-Year Capital Action Plan are included in the Draft Plan in Attachment C, on pages 175 through 188. NYCHA's FY 2026 Capital Plan and Five-Year Action Plan continue to focus investment to address the key issues outlined in the HUD Agreement: (1) investments in roofs, façades, and plumbing components to help address mold, (2) investments in heating and elevator systems to address boiler and elevator deficiencies, (3) investments in the waste management plan to control pest issues, and (4) safety and security investments in fire alarms. In addition, to address sites with a (i) high incidence of mold complaints and/or (ii) potential lead paint risks, NYCHA will be undertaking comprehensive modernization efforts with a variety of funding sources, including federal funds. The Five-Year Capital Action Plan reflects the estimated capital budget for the RAD pre-closing costs by development.

The Capital Fund Program Action Plan is complemented by similar investments, including roofs, heating plants, elevators, waste management, and comprehensive modernization projects, that will be funded with City and State resources.

Housing Opportunity Through Modernization Act (HOTMA) Sections 102 and 104

HUD published new regulations in February 2023 implementing changes under the Housing Opportunity Through Modernization Act (HOTMA). Sections 102 and 104 of HOTMA make changes to the United States Housing Act of 1937, particularly those affecting income calculations and reviews. Section 102 changes requirements related to income reviews for public housing and Section 8 programs. Section 104 sets maximum asset limits for public housing and Section 8 applicants and participants. HUD has issued guidance via PIH Notice 2026-09 requiring implementation by January 1, 2027. Please see Attachment L on pages 239 to 246 for more information on the changes that will apply to NYCHA's Housing Choice Voucher (HCV) and public housing programs.

ATTACHMENT A
PHA PLAN UPDATE

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

• Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures • Financial Resources • Rent Determination • Operation and Management • Demolition and Disposition, Conversion of Public Housing, Homeownership, Project Based Vouchers and Rental Assistance Demonstration (RAD) • Housing Needs • 5-Year 2026-2030 Capital Fund Action Plan • Statement of Progress in Meeting Mission and Goals – FY 2025 to FY 2029	• Admissions Policy for Deconcentration • Resident Advisory Board Members • PHA Management Organizational Chart • Agendas of Meetings Held with NYCHA's Resident Advisory Board • Homeownership Program • Designated Housing for Elderly and Disabled Families • Community Service and Self-Sufficiency Programs • Safety and Crime Prevention

B) Identify the specific locations where the public may obtain copies of the Annual PHA Plan.

The *Draft Annual Plan for FY 2027* is available for public inspection at NYCHA's principal office, located at 90 Church Street, New York, NY between the hours of 9:30 a.m. to 4:30 p.m. Please email annualplancomments@nycha.nyc.gov to schedule a time to review the Plan.

The Draft Agency Annual Plan for FY 2027 is also available at the following locations:

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

C) Plan Elements (24 CFR 903.7)

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

A. Public Housing

(1) Eligibility

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

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

Preliminarily, when the family is selected for the Certified Waiting list, and finally, when the family is selected for a unit.

☐ Other: (describe)

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

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

NYCHA takes appropriate action before admission to check each family's criminal background and landlord history, and verifies their actual composition and the citizenship/immigration status of each household member as required under Federal law.

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

☐ Yes ☒ No

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

(2) Waiting List Organization

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

- ☐ Community-wide list
- ☒ Sub-jurisdictional lists *(By NYC Borough and citywide)*
- ☒ Site-based waiting lists ***See Attachment I***
- ☐ Other (describe)

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

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

NYCHA maintains two Walk-in Customer Contact Centers serving the five boroughs of New York City by appointment. The elderly and the disabled can come in without an appointment. However, appointments are strongly recommended to decrease wait time. Applicants may also apply online at NYCHA's website. http://www1.nyc.gov/site/nycha/about/contact.page

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

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

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

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

4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?
   - ☐ PHA main administrative office
   - ☐ All PHA development management offices
   - ☐ Management offices at developments with site-based waiting lists
   - ☐ At the development to which they would like to apply
   - ☒ Other (list below)

   NYCHA maintains two walk-in Customer Contact Centers serving the five boroughs of New York City by appointment. The elderly and the disabled can come in without an appointment. However, appointments are strongly recommended to decrease wait time.

d. Additional Information

NYCHA assists the management companies of the following developments with their waiting lists for the public housing units located in their developments. This assistance may include sending the management companies lists of public housing applicants that may qualify for their

developments or by sending canvass letters to applicants on NYCHA's public housing waiting list to advise them of the opportunity to submit an application for these properties.

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

- *1070 Washington Avenue (La Preciosa) (NY005024000)*
- *Prospect Plaza Phase I (NY005025000)*
- *Prospect Plaza Phase II (NY005025001)*
- *PSS Grandparent Family Apartments (NY005005600) - Please note that this development will convert to the Section 8 program in the future.*
- *Randolph South (NY005026000)*

(3) Assignment

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

☒ One
☒ Two
☐ Three or More

An applicant is offered one or two-unit choices based on their priority and their selected waiting list, depending on whether it is jurisdictional (2 apartment offers for citywide or borough-wide waiting lists) or site-based (1 apartment offer for a development waiting list).

b. Is this policy consistent across all waiting list types?

☐ Yes ☒ No:

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

VAWA/emergency referrals may receive an additional choice if there is a safety concern and reasonable accommodation referrals may receive an additional choice if their needs are not being met. Those on development waiting lists get one offer, while those on borough and city-wide waiting lists receive up to two with the above exceptions.

(4) Admissions Preferences

a. Income targeting:

Does the PHA plan to exceed the federal targeting requirements by targeting more than 40 percent of all new admissions to public housing to families at or below 30 percent of median area income?

☐ Yes ☒ No:

While NYCHA does not plan to exceed the federal targeting requirements, about 80% of the families admitted to public housing during calendar year 2025 were households with incomes at or below 30% of area median income.

b. Transfer policies:

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

- ☒ Emergencies
- ☐ Overhoused
- ☐ Underhoused
- ☐ Medical justification
- ☒ Administrative reasons determined by the PHA (e.g., to permit modernization work)
- ☐ Resident choice: (state circumstances below)
- ☒ Other: (list below)

Tenant transfers for reasonable accommodation.

Tenants whose apartments have become uninhabitable or whose expeditious relocation is required to address health, safety, or environmental concerns.

Tenants relocated for development, building, or unit renovation, repair, or other use, or due to the requirements of a special purpose program.

Tenants of the affected public housing development or building who were required by NYCHA to relocate due to renovation; health, safety, or environmental concerns; or uninhabitable conditions, and who wish to return to the development, building, or unit from which they were relocated, once the renovation or repairs are complete.

Tenants who are victims of domestic violence, sexual assault, dating violence, stalking, intimidated witnesses, or intimidated witnesses, in accordance with the Violence Against Women Act (VAWA).

Accessible Apartments.

Preferences

1. Has the PHA established preferences for admission to public housing (other than date and time of application)? (If "no" is selected, skip to subsection (5) Occupancy)
   ☒ Yes ☐ No:

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

   Former Federal preferences:

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

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

Intimidated Witnesses.

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

Doubled up or overcrowded in apartment not subsidized by NYCHA.

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

Referrals from the New York City Department of Homeless Services.

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

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

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

Former Federal preferences:

1, 3 Homelessness
1, 3 Involuntary Displacement (Disaster, Government Action, Inaccessibility, Property Disposition)
1,2 Victims of Domestic Violence
3 Action of Housing Owner
3 Substandard Housing
3 High Rent Burden
Other preferences (select all that apply)

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

☒ **1,2,3** Working families and those unable to work because of age or disability referred by the NYC Department of Homeless Services, New York City HIV/AIDS Services Administration, the Administration for Children's Services, the New York City Department of Housing Preservation and Development, the New York City Human Resources Administration or the New York City Health and Hospitals Corporation

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

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

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

1 - Intimidated witnesses.

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

3 – Doubled up in apartment not subsidized by NYCHA.

3 – Overcrowded in apartment not subsidized by NYCHA.

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

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

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

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

4. Relationship of preferences to income targeting requirements:
   - ☐ The PHA applies preferences within income tiers
   - ☒ Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Occupancy

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)
   - ☒ The PHA-resident lease
   - ☒ The PHA's Admissions and (Continued) Occupancy policy
   - ☒ PHA briefing seminars or written materials
   - ☐ Other source (list): NYCHA's website, https://www.nyc.gov/site/nycha/index.page

b. How often must residents notify the PHA of changes in family composition? (select all that apply)
   - ☒ At an annual reexamination and lease renewal
   - ☒ Any time family composition changes
   - ☒ At family request for revision
   - ☐ Other (list)

(6) Deconcentration and Income Mixing (*Please see Attachment F on page 220*)

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

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

c. If the answer to b was yes, what changes were adopted? (select all that apply)
☐ Adoption of site-based waiting lists. If selected, list targeted developments below:
☒ Employing waiting list "skipping" to achieve deconcentration of poverty or income mixing goals at targeted developments. If selected, list targeted developments below:

All lower income developments.

☐ Employing new admission preferences at targeted developments. If selected, list targeted developments below:
☐ Other (list policies and developments targeted below)

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

e. If the answer to d was yes, how would you describe these changes? (select all that apply)
☒ Additional affirmative marketing
☐ Actions to improve the marketability of certain developments
☐ Adoption or adjustment of ceiling rents for certain developments
☐ Adoption of rent incentives to encourage deconcentration of poverty and income-mixing
☐ Other (list below)

f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)
☐ Not applicable: results of analysis did not indicate a need for such efforts
☒ List (any applicable) developments below:

All lower income developments.

g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)
☒ Not applicable: results of analysis did not indicate a need for such efforts
☐ List (any applicable) developments below:

7) Resident Police Officers (RPO)

Pursuant to a Memorandum of Understanding between NYCHA and the New York City Police Department (NYPD), the Authority provides apartments to Police Officers and their families at rents comparable to NYCHA resident employee rents. The presence of a Police Officer who resides in a NYCHA development enhances security, fosters a greater understanding between NYCHA residents and the Police, and provides role models for the youth residing in that development. A Resident Police Officer (RPO) is required to perform a minimum of eight hours of Community Service per month. This

Community Service may not include police work, law enforcement, Tenant Patrol or other security-related work.

NYCHA currently has 5 RPOs living in the following NYCHA developments: Amsterdam, Latimer Gardens, Mott Haven, Throggs Neck, and Vladeck

B. Section 8

(1) Eligibility

a. What is the extent of screening conducted by the PHA? (select all that apply)
- ☒ Criminal or drug-related activity only to the extent required by law or regulation
- ☐ Criminal and drug-related activity, more extensively than required by law or regulation
- ☐ More general screening than criminal and drug-related activity (list factors below)
- ☐ Other (list below)

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

c. Does the PHA request criminal records from State law enforcement agencies for screening purposes? Only when search is flagged
☒ Yes ☐ No

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

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

e. Indicate what kinds of information you share with prospective landlords? (select all that apply)
- ☐ Criminal or drug-related activity
- ☒ Other (describe below)

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

(2) Waiting List Organization

a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)
- ☒ None
- ☐ Federal public housing
- ☐ Federal moderate rehabilitation
- ☐ Federal project-based certificate program

☐ Other federal or local program (list below)

b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)
☐ PHA main administrative office
☒ Other (list below)

The New York City Housing Authority (NYCHA) reopened the waitlist to the general public for its Housing Choice Voucher (Section 8) Program from Monday, June 3, 2024, through Sunday, June 9, 2024. The waitlist is now closed to the general public.

NYCHA will continue accepting referrals from the following sources: (1) homeless referrals from New York City (NYC) agencies; (2) referrals from the New York City Administration for Children's Services (ACS) for youth in the Family Unification Program (FUP) whose assistance is expiring as a result of the term limit on their voucher without subsequent adequate housing; (3) referrals from ACS for FYI assistance for youth leaving foster care who are homeless or at risk of homelessness; (4) referrals by a prosecutorial or law enforcement agency for victims of domestic violence and intimidated witnesses; and (5) referrals from NYCHA's Public Housing Operations Department for public housing residents because their unit is not habitable, they are at risk of displacement, they are extremely under occupied or extremely over crowded, or they have been on the public housing transfer waitlist for two years or longer as a domestic violence (VDV), dating violence, sexual assault or stalking victim or seek transfer as a reasonable accommodation.

(3) Search Time

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

If yes, state circumstances below:

NYCHA's voucher term is 180 days. This includes the initial term of 120 days, plus an automatic 60-day extension. This exceeds HUD's standard 60-day period. Voucher holders may request an extension to this term.

(4) Admissions Preferences

a. Income targeting

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

b. Preferences

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

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

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

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

Preferences	Description
1	Homeless referrals from New York City (NYC) agencies, including referrals from ACS for FUP Youth voucher holders at risk for homelessness due to the expiration of FUP Youth assistance.
2	Victim of Domestic Violence Intimidated Witness - referred by prosecutorial or law enforcement agency
3	NYCHA public housing residents required to move because: (a) their unit is not habitable (b) they are at risk of displacement; or (c) they are extremely under occupied or extremely overcrowded in their current apartment.
4	Mobility impaired and residing in inaccessible housing
5	Elderly persons and persons with disabilities
6	All other applicants

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

Former Federal preferences

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

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

Preferences	Description
1	Homeless referrals from New York City (NYC) agencies, including referrals from ACS for FUP Youth voucher holders at risk for homelessness due to the expiration of FUP Youth assistance.
2	Victim of Domestic Violence Intimidated Witness - referred by prosecutorial or law enforcement agency
3	NYCHA public housing residents required to move because: (a) their unit is not habitable (b) they are at risk of displacement; or (c) they are extremely under occupied or extremely over crowded in their current apartment.
4	Mobility impaired and residing in inaccessible housing
5	Elderly persons and persons with disabilities
6	All other applicants

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)
☒ Date and time of application
☐ Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for "residents who live and/or work in the jurisdiction" (select one)
☐ This preference has previously been reviewed and approved by HUD
☐ The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)
☐ The PHA applies preferences within income tiers
☒ Not applicable: The pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Special Purpose Section 8 Assistance Programs

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

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

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

☐ Through published notices
☒ Other (list below)

NYCHA receives direct referrals for special programs. NYCHA partners with agencies such as the Department of Veterans Affairs (VA), New York City Department of Veterans' Services (DVS), and Administration for Children Services (ACS) as required for the special program type.

Veterans Affairs Supportive Housing (VASH)

The Authority has a total allocation of 3,440 vouchers. NYCHA administers VASH vouchers in partnership with the Department of Veterans Affairs (VA) and the New York City Department of Veterans' Services (DVS). Applicants are identified, screened, and referred by the VA and DVS to NYCHA for eligibility certification and voucher issuance.

2. Financial Resources

[24 CFR Part 903.7 (c)]

Financial Resources: 2026 Planned Sources and Uses		
Sources	**Planned $**	**Planned Uses**
1. Federal Grants (FY 2026 grants)		
a) Public Housing Operating Fund	$1,269,609,756	*Public Housing Operations*
b) Public Housing Capital Fund (2025 Grant)	$ 736,937,202	*Public Housing Rehabilitation*
c) Annual Contributions for Section 8 Tenant-Based Assistance	$2,581,106,244	*Section 8 Program Operations*
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (as of February 28, 2026)		
FY 2023 Capital Fund	$14,565,891	*Modernization*
FY 2024 Capital Fund	$182,024,163	*Modernization*
Replacement Housing Factor	$0	*New affordable housing construction*
Emergency Safety & Security Grants	$450,946	*Funding for safety & security*
Lead Based Paint Grant	$2,516,504	*Funding for lead abatement*
3. **Public Housing Dwelling Rental Income (includes City and State Developments)**	$857,770,944	*Public housing operations, safety and security, and supportive services*
1. 4. Other income (list below)		
Other Revenue from Operations (includes City and State Developments)	$33,115,308	*Public Housing Operations*
Interest Income	$8,714,646	*Public Housing Operations*
Other Categorical Grants	$2,936,736	*Improve residents' self-sufficiency, summer intern program, and support for Resident Watch program*
Revenue earned from PACT transactions	$76,722,552	*Public Housing proceeds and reimbursements earned from Real Estate transactions*

Financial Resources: 2026 Planned Sources and Uses		
Sources	**Planned $**	**Planned Uses**
Miscellaneous Income (includes Debt Service)	$482,824,864	*Public housing operations, safety and security, reserves, and supportive services*
Total Resources	**$6,249,295,756**	

3. Rent Determination

[24 CFR Part 903.7 (d)]

Public Housing

(1) Income Based Rent Policies

a. Use of discretionary policies: (select one)

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

---or---

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

b. Minimum Rent

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

☒ $0
☐ $1-$25
☐ $26-$50

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

☐ Yes ☒ No

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

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

☐ Yes ☒ No

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

☐ For the earned income of a previously unemployed household member

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

e. Ceiling rents

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

f. Rent re-determinations:

1. Between income reexaminations, how often must tenants report changes in income or family composition to the PHA such that the changes result in an adjustment to rent? (select all that apply)
☐ Never
☐ At family option
☒ Any time the family experiences an income increase

Due to addition of a family member or when there is an interim rent reduction with income subsequently restored.

☐ Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold) _____
☒ Other (list below)

Decreases in family income must be reported as well as any change in family composition.

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

(2) Flat Rents

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

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

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

   ***Effective January 1, 2026**: Newly admitted public housing residents or transferring public housing residents who will pay flat rent rather than income-based rent will pay the new flat rent amounts listed in the table below.*

   ***Effective 1st Quarter 2026 Annual Reviews (with a new rent effective date of May 1, 2026):** Current public housing residents whose family's annual income is reviewed in this quarter who will pay flat rent rather than income-based rent will pay the new flat rent amounts listed in the table below.*

Apartment Size	Current FY 2026 Fair Market Rent	NYCHA's FY 2026 Flat Rent
Studio	$2,529	$2,024
1 Bedroom	$2,655	$2,124
2 Bedroom	$2,910	$2,328
3 Bedroom	$3,644	$2,916
4 Bedroom	$3,959	$3,168
5 Bedroom	$4,553	$3,643
6 Bedroom	$5,147	$4,118

Section 8 Tenant-Based Assistance

(1) Payment Standards

Describe the voucher payment standards and policies.

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

- ☐ At or above 90 percent but below100 percent of FMR
- ☐ 100 percent of FMR
- ☒ Above 100 percent but at or below 110 percent of FMR
- ☐ Above 110 percent of FMR (if HUD approved; describe circumstances below)

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

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

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

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

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

- ☒ Annually
- ☐ Other (list below)

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

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

Federal budget appropriation and standards adopted by local Section 8 administrators.

(2) Minimum Rent

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

- ☐ $0
- ☐ $1-$25
- ☒ $26-$50

NYCHA's minimum rent for the Housing Choice Voucher Program ($50.00)

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

☒ Yes ☐ No

Exemption policies are described in Section 8 Administrative Plan, which is a Supporting Document available for review. Members of the public wishing to examine the Supporting Documents may email annualplancomments@nycha.nyc.gov. The document is also available on NYCHA's webpage at hcpvadministrative.pdf (nyc.gov)

4. Operation and Management

[24 CFR Part 903.7 (e)]

A. PHA Management Structure

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

B. HUD Programs Under PHA Management

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

Program Name	**Units or Families Served at Year Beginning 2025**	**Expected Turnover**
Public Housing	146,255	3,381
Section 8 Vouchers	110,304	7.22%
ROSS Service Coordinator Grant 2022: To enhance self-sufficiency by accessing employment and other economic-related resources and opportunities to NYCHA residents through geographically based service coordination in 6 NYCHA communities. The grant start date was extended and began on 12/01/23.	239 services provided to ROSS residents from reporting period of 12/01/2025 to 12/31/25	N/A
Other Federal Programs (list individually)		
City Harvest Mobile Market Program: New York first and largest food rescue organization, that helps to feed millions of New Yorkers who struggle to put meals on their tables.	3,654,281 lbs. of produce to 145,989 households in NYC during calendar year 2025, of which 3,171,040 lbs. were given to 127,248 NYCHA households through Mobile Markets. This also includes partner distributions held on NYCHA properties (Polo Grounds, Pink Houses, Oceanside Apartments, Douglass Houses).	N/A
Elderly Safe at Home: The Elderly Safe at Home program provides services geared towards enhancing the general quality of life of elderly and nonelderly disabled residents who reside in 12 NYCHA developments. This program provides	An average of 977 residents served monthly during calendar year 2025	N/A

on-site social services to help improve their safety & security and enhance their health & well-being and allows residents to continue to live independently in their homes and prevent premature institutionalization. Program services include: support and crime prevention, crisis intervention, and crime victim assistance to address and prevent crimes perpetrated against this vulnerable population. The program also assists residents with maintaining activities of daily living, accessing public entitlements, and coordinating services with outside providers. Residents can meet with the assigned worker in the social service office or in their homes. Workers are also expected to conduct regular home visits and telephone reassurance. This program also recruits and trains resident volunteers who are organized into a floor captain/buddy system and maintain daily contact with residents in their respective developments. The floor captains are the eyes and ears of the program. They are often the first to detect if something is wrong or identify an incident requiring immediate attention and are obligated to report back to program staff. This program also offers workshops on crime prevention, safety and security, and crime victims' rights and the criminal justice process. Information on these and other topics is disseminated through pamphlets and regularly scheduled meetings at program sites. Residents who need more comprehensive crime victim services are referred to community-based organizations and/or City agencies that specialize in this field.		
Family Self-Sufficiency Program (FSS): A HUD initiative that promotes economic self-sufficiency among participating families by referring them to educational, career counseling, money management, job training as well as job placement services. Participants receive a savings account which grows as the family's earned income increases. Upon completion of the five-year FSS Contract of Participation, the family receives the money accumulated in the account, provided that the participant is employed, and no family member is receiving cash public assistance benefits.	417 enrollments as of 12/31/25	N/A

C. Management and Maintenance Policies

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

□ *NYCHA Admissions and Continued Occupancy Policy (ACOP)*

□ *NYCHA Management Manual*

□ *NYCHA Application and Tenancy Administration Manual*

(2) Section 8 Management: (list below)

□ *NYCHA Section 8 Administrative Plan*

Members of the public wishing to examine the Management and Maintenance Policies may email annualplancomments@nycha.nyc.gov for further information.

5. PHA Grievance Procedures

[24 CFR Part 903.7 (f)]

A. Public Housing

1. Has the PHA established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing?

☒ Yes ☐ No:

If yes, list additions to federal requirements below:
For a full list of additions to federal requirements provided for in NYCHA's written grievance procedures, please see NYCHA Form 040302, posted on the NYCHA website at https://www.nyc.gov/assets/nycha/downloads/pdf/pp/nycha-grievance-procedures-english.pdf, and further described in NYCHA's ACOP at https://www.nyc.gov/site/nycha/residents/acop/chapter-12.page.

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

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

B. Section 8 Tenant-Based Assistance

1. Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the

Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

☐ Yes ☒ No

If yes, list additions to federal requirements below:
Informal conference and appeal options are offered as mandated by the Williams Consent Decree

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

☒ PHA main administrative office
☒ Other (list below)

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

6. Designated Housing for Elderly and Disabled Families

[24 CFR Part 903.7 (i)]

1. Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year?

☒ Yes ☐ No

On June 13, 2025, NYCHA released a new Draft Designated Housing Plan for its current portfolio of elderly-only developments and buildings and requested HUD authorization to extend the designation for five years as per the requirements of 42 U.S.C. § 1437e, 24 CFR Part 5, and PIH 2005-2 (HA). NYCHA has operated designated housing for the elderly with HUD's approval since 1999, receiving permission to renew the designation at two-year intervals. By letter dated April 30, 2024, HUD informed NYCHA that it would be required to submit a new Designated Plan because the number of units in the Plan decreased by more than ten percent from the original 1999 approval of 9,849 units.

NYCHA prepared and released for public review and comment a draft Designated Plan as part of the Annual Plan process in June 2025, followed by a public hearing in July 2025. On April 28, 2026, NYCHA submitted a revised Designated Plan to reflect changes in eligibility criteria and to update data with respect to the developments and buildings covered in the designation as well as the increase in the elderly population in New York City and at NYCHA. The revised Plan is currently under HUD review.

The revised designation encompasses 5,770 public housing units in 22 elderly-only developments and 10 elderly-only buildings in 8 general population developments throughout the five boroughs of New York City. These units comprise 4% of NYCHA's total public housing inventory. There are 995 zero-bedroom units, 4,603 one-bedroom units, and 172 two-bedroom units covered in this Plan.

In the Plan, NYCHA revises its eligibility criteria for these elderly-only properties in accordance with the definition of "elderly family" in 24 CFR 5.403. Specifically, a household consisting of an elderly (62 and over) head of household or spouse/co-head and other non-elderly household members will be eligible to reside in these properties. In addition, the plan explains that fully-accessible units within the designated developments or buildings are available to eligible households, regardless of whether the household member requiring a fully-accessible unit is elderly or non-elderly.

Currently, there is one elderly-only development (Bronx River Addition) that has voted to join the Trust, and thirteen elderly-only developments are scheduled to be converted through the PACT program. The Trust and PACT status of the developments are noted in the tables below and on the following pages. As of June 5, 2026, 2,431 of the 5,770 units proposed for elderly-only designation are also proposed to be converted to Section 8. This encompasses 42% of the units

proposed for designation. This number may increase in the future as more developments vote to join the Trust or are identified for PACT conversion.

BRONX

Designation of Public Housing Activity Description
1a. Development name: **Bronx River Addition** **Please note this development is scheduled to convert to through the NYC Public Housing Preservation Trust in the future.* 1b. Development (project) number: **NY005010320**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
2. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 226 7. Coverage of action (select one) ☐ Part of the development ☒ Total development **Please note that 120 of the 226 elderly-only units at Bronx River Addition (NY005010320) are currently being held vacant for major repairs in the building.*

Designation of Public Housing Activity Description
1a. Development name: **College Avenue-East 165th Street** **Please note this development is scheduled to convert to PACT in the future* 1b. Development (project) number: **NY005013080**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved**, submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?

6. Number of units affected: 95
7. Coverage of action (select one)
☐ Part of the development
☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Glebe Avenue-Westchester Avenue** **Please note this development is scheduled to convert to PACT in the future* 1b. Development (project) number: **NY005010670**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 132 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Mayor John Purroy Mitchel** 1b. Development (project) number: **NY005011450**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 165 7. Coverage of action (select one) ☒ Part of the development ☐ Total development

Designation of Public Housing Activity Description
1a. Development name: **Morrisania Air Rights** 1b. Development (project) number: **NY005012670**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4 Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 300 7. Coverage of action (select one) ☒ Part of the development ☐ Total development

Designation of Public Housing Activity Description
1a. Development name: **Randall Avenue – Balcom Avenue** **Please note this development is scheduled to convert to PACT in the future* 1b. Development (project) number: **NY005010630**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 252 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

BROOKLYN

Designation of Public Housing Activity Description
1a. Development name: **Bernard Haber** 1b. Development (project) number: **NY005011660**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 380 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Borinquen Plaza I** 1b. Development (project) number: **NY005012430**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 144 7. Coverage of action (select one) ☒ Part of the development ☐ Total development

Designation of Public Housing Activity Description
1a. Development name: **Eleanor Roosevelt I** 1b. Development (project) number: **NY005011350**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 159 7. Coverage of action (select one) ☒ Part of the development ☐ Total development

Designation of Public Housing Activity Description
1a. Development name: **Kingsborough Extension** 1b. Development (project) number: **NY005010100**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 184 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Marcus Garvey (Group A)** **Please note this development is scheduled to convert to PACT in the future* 1b. Development (project) number: **NY005012520**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 86 7. Coverage of action (select one) ☒ Part of the development ☐ Total development

Designation of Public Housing Activity Description
1a. Development name: **Reverend Randolph Brown** **Please note this development is scheduled to convert to PACT in the future* 1b. Development (project) number: **NY005012520**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 200 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Surfside Gardens** 1b. Development (project) number: **NY005011700**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 270 7. Coverage of action (select one) ☒ Part of the development ☐ Total development

Designation of Public Housing Activity Description
1a. Development name: **Vandalia Avenue** 1b. Development (project) number: **NY005011940**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 293 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Van Dyke II** 1b. Development (project) number: **NY005011680**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 112 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Carter G. Woodson** 1b. Development (project) number: **NY005011680**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 407 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

MANHATTAN

Designation of Public Housing Activity Description
1a. Development name: **Baruch Houses Addition** 1b. Development (project) number: **NY005010600**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 197 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Harborview Terrace** 1b. Development (project) number: **NY005010220**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 195 7. Coverage of action (select one) ☒ Part of the development ☐ Total development

Designation of Public Housing Activity Description
1a. Development name: **Ira S. Robbins Plaza** **Please note this development is scheduled to convert to PACT in the future.* 1b. Development (project) number: **NY005011390**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 150 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Judge Max Meltzer Tower** **Please note this development is scheduled to convert to PACT in the future.* 1b. Development (project) number: **NY005011000**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 231 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Lower East Side I Infill** 1b. Development (project) number: **NY005011000**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 72 7. Coverage of action (select one) ☒ Part of the development ☐ Total development

Designation of Public Housing Activity Description
1a. Development name: **Mayor Fiorello H. LaGuardia Addition** 1b. Development (project) number: **NY005010760**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 150 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Sondra Thomas Apartments** **Please note this development is scheduled to convert to PACT in the future* 1b. Development (project) number**: NY005011270**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 87 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

QUEENS

Designation of Public Housing Activity Description
1a. Development name: **College Point Rehab** 1b. Development (project) number: **NY005011860**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 13 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **John Conlon LIHFE Towers** **Please note this development is scheduled to convert to PACT in the future* 1b. Development (project) number: **NY005010910**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 216 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **International Tower** **Please note this development is scheduled to convert to PACT in the future* 1b. Development (project) number: **NY005010910**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected:159 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Leavitt Street-34th Avenue** 1b. Development (project) number: **NY005011860**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected:83 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **Shelton Houses** **Please note this development is scheduled to convert to PACT in the future* 1b. Development (project) number: **NY005010910**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 155 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

STATEN ISLAND

Designation of Public Housing Activity Description
1a. Development name: **Cassidy-Lafayette** 1b. Development (project) number: **NY005011170**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 380 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

Designation of Public Housing Activity Description
1a. Development name: **New Lane Area** **Please note this development is scheduled to convert to PACT in the future* 1b. Development (project) number: **NY005010350**
2. Designation type: ☒ Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities
3. Application status (select one) ☐ Approved; included in the PHA's Designation Plan ☒ Submitted, pending approval ☐ Planned application
4. Date this designation approved, **submitted**, or planned for submission: **April 28, 2026**
5. If approved, will this designation constitute a (select one) ☒ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 277 7. Coverage of action (select one) ☐ Part of the development ☒ Total development

7. Community Service and Self-Sufficiency

[24 CFR Part 903.7 (l)]

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

1. Cooperative agreements:

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

☒ Yes ☐ No:

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

- Electronic Funds Transfer – April 9, 1998
- Data Sharing – March 28, 2001
- Data Sharing – July 14, 2015
- Data Sharing – May 17, 2021
- Emergency Housing Voucher MOU – July 1, 2021
- Emergency Housing Voucher Data Sharing – July 22, 2021
- Emergency Housing Voucher Data Sharing Amendment – September 10, 2021
- Emergency Housing Voucher Data Sharing Amendment – November 1, 2021
- Emergency Housing Voucher Data Sharing Amendment – November 12, 2021
- Emergency Housing Voucher Data Sharing Amendment – December 23, 2021
- Emergency Housing Voucher Data Sharing Amendment – February 9, 2022
- Emergency Housing Voucher Data Sharing Amendment – August 15, 2022
- Emergency Housing Voucher Data Sharing Amendment – May 24, 2023
- Emergency Housing Voucher Data Sharing Amendment – December 6, 2023
- HRA MOU for Data Verification through Worker Connect – December 15, 2021
- HRA First Amendment to MOU for Data Verification through Worker Connect – November 6, 2025
- HRA Rental Arrears Data Sharing MOU – July 19, 2018
- NYS OTDA Data Sharing Intergovernmental Agreement – July 25, 2023
- HPD, HRA, NYC Continuum of Care and NYC H+H MOU for Stability Vouchers – March 1, 2024
- OTDA Amended and Restated Data Sharing Intergovernmental Agreement – April 22, 2024
- OTDA Amendment One to the Amended and Restated Data Sharing Intergovernmental Agreement – October 10, 2024
- ENDGB Fatality Advisory Committee MOU – September 13, 2023
- HRA Cooperative Agreement for Jobs-Plus Program - January 16, 2024 (July 1, 2023 – June 30, 2024, with three automatic one-year renewals)
- HRA Agreement for HRA Analysis of NYCHA Data – May 8, 2024
- OTDA Approval Request Letter and REVISED Program Plan Agreement FINAL (CRA Plan) – October 15, 2024

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

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

B. Services and programs offered to residents and participants

(1) General

a. Self-Sufficiency Policies

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

☒ Public housing rent determination policies:

☒ Public housing admissions policies:

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

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

b. Economic and Social self-sufficiency programs

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

☒ Yes ☐ No

Program Name	Units or Families Served at Year Beginning 2025	Expected Turnover
ROSS Service Coordinator Grant 2022: A HUD funded initiative to enhance self-sufficiency by accessing employment and other economic-related resources and opportunities to NYCHA residents through geographically based service coordination in 6 NYCHA developments on the Lower East Side, East Harlem and East Brooklyn. This grant start date was extended and began on 12/01/23, with an expected end date of 11/31/26.	239 services provided to ROSS residents from reporting period of 01/01/2025 to 12/31/25	N/A
Family Self-Sufficiency Program (FSS): A HUD initiative that promotes economic self-sufficiency for participating families by referring them to educational, career counseling, money management, job training as well as job placement services. Participants receive a savings account which grows as the family's earned income increases. Upon completion of the five-year FSS Contract of Participation, the family receives the money accumulated in the account, provided that the participant is employed, and no family member is receiving cash public assistance benefits. Grant funding period 1/1/25 to 12/31/25.	417 program enrollments as of 12/31/25	N/A
HUD Jobs Plus Grant FY23 Jobs Plus is a place-based program that provides employment services, financial counseling, job placement assistance, community support for work and other wrap around services to support the residents of the developments. Residents are also eligible for a rent incentive program called the Jobs-Plus Earned Income Disallowance, which will reduce the burden an increase in income from employment may cause on rent calculation. The HUD Funded program in Coney Island, Brooklyn, serves the residents of Coney Island Houses, Surfside Gardens and Coney Island Houses (Site 4 & 5). The program started 2/1/25.	149 residents enrolled as of 12/31/25	N/A

DOL YouthBuild Grant FY24 YouthBuild is a pre-apprenticeship program model that prepares participants between the ages of 16 and 24 without high school diplomas for quality jobs in various industry sectors as well as provide participants with wrap-around supportive services. YouthBuild programs must offer participants construction training and hands-on experiences building affordable housing for their community. The NYCHA YouthBuild program will serve 60 NYCHA residents ages 17-24 residing in Brownsville and Ocean Hill Brooklyn and provides 6-months of GED and occupational training in construction, and 12 months of follow-up support. Participants are provided with a stipend while in the program. The grant funding period is from 06/01/2024 to 09/30/2027.	46 participants enrolled as of 12/31/2025		N/A	
Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/ specific criteria/other)	Access (development office / PHA main office / office / another provider name)	Eligibility (public housing or section 8 participants or both)
NYCHA's Office of Resident Economic Empowerment and Sustainability (REES) Intake & Assessment				
REES and Partner Information Sessions: Participants receive an orientation to REES and REES partner services, as well as an individual assessment and referrals to REES partner providers for appropriate services	4,532 attendees at an information session from reporting period 01/01/25 to 12/31/25	Self-referred, unemployed and under-employed public housing & Section 8 residents	REES offices located at central office location in Downtown Brooklyn / Offsite information sessions at NYCHA campuses and/or virtually	Public Housing Residents/ Section 8 Residents
REES Hotline Activity: The REES hotline facilitates over the phone resident self-refers to partner programs and serves as a resource for residents to RSVP for upcoming events, testing and information sessions.	15,801 calls handled from reporting period 01/01/25 to 12/31/25	Self-referred, unemployed and under-employed public housing & section 8 residents	Via phone	Public Housing /Section 8 residents
REES Microsite Activity: The microsite provides information about economic opportunity services, events and job opportunities available through REES and its partners. Residents can use the site to take action and "self-refer" to programs through downloadable referral slips and RSVP for events.	184,000 visitors from reporting period 01/01/25 to 12/31/25	Self-referred, unemployed and under-employed public housing & section 8 residents	Via REES' microsite: www.opportunitynycha.org	Public Housing / Section 8 residents
REES Job Placement				
Direct job placement facilitated by REES through the Section 3 mandate, the NYCHA Resident Training Academy, and outside employers.	574 direct job placements from reporting period 01/01/25 to 12/31/25	Self-referred unemployed and under-employed	REES offices located at central office location in Downtown Brooklyn	Public Housing Residents

		public housing residents		
Section 3: A HUD-mandated program whose purpose is to ensure that employment and other economic opportunities generated by Federal assistance to public housing authorities shall, to the greatest extent feasible, be directed to public housing residents and other low and very low-income persons.	672* Projected Hires on contracts awarded from reporting period 01/01/25 to 12/31/25**Hiring projections include those made on upcoming NYCHA Real Estate Development projects. Contracts that do not trigger Section 3, but include other hiring contractual obligations, are also included.*	NYCHA residents and other Section 3 workers	REES offices at Downtown Brooklyn, contractor and work locations throughout NYCHA	NYCHA residents and other Section 3 residents
Jobs Plus: Through 10 coordinated sites serving 40 developments citywide, the Jobs Plus employment program seeks to raise the level of employment for the residents of selected developments by increasing family income through: Employment-related services Rent incentives that help make work pay and neighbor to neighbor support for work and other wraparound services including mental health integration supports. • Jobs-Plus is administered by NYCHA, the NYC Human Resources Administration/Department of Social Services (HRA/DSS), NYC Office of Economic Opportunity (NYC Opportunity) and the NYC Office of Financial Empowerment (OFE) • In August 2024, NYCHA was awarded $3.7M through a FY23 HUD Jobs Plus Grant to launch a Jobs Plus program serving the residents of Coney Island House, Coney Island Houses (Sites 4 & 5) and Surfside Gardens. This site launched on 2/1/25.	1,171 verified placements from reporting period 01/01/25 to 12/31/25 (Additional placements are pending verification).	Public Housing Residents	• South Bronx Site I (South Bronx) and Bronx Site II (Northwest Bronx) – Bronx Works • South Bronx Site II –East Side Settlement House • Western Queens I – Urban Upbound • Western Queens II- Urban Upbound • Western Queens III- America Works of NY, Inc. • Lower East Side – Henry Street Settlement House • Central Brooklyn – Fed Cap (as of August 2025) • Brownsville Brooklyn I- FedCap • Brownsville Brooklyn II- America Works of NY, Inc. • Staten Island – Equus Workforce Solutions	Public Housing Residents Must be a public housing resident of one of 40 targeted developments city-wide.

REES Connection to Services				
Recruitment for Cohort Based Services and program enrollment: Services in the following categories are offered through REES partners in the five boroughs • Vocational Training • Adult Education • Financial Education • Business Development	1,276 enrollments in classes and trainings as of reporting period 01/01/25 to 12/31/25	Residents are recruited in time-bound, targeted recruitment campaigns that may include information sessions, pre-screening events, and targeted mailings, phone-banking and web-based outreach. Recruitment is based on minimum criteria of each program	Services provided at partner locations	Public Housing Residents/ Section 8 residents
Referrals to Ongoing Services: Services in the following categories are offered through REES partners in the five boroughs • Vocational Training • Adult Education • Financial Counseling • SNAP Access • Workforce Development • Business Planning	841 unique residents were referred to ongoing services from reporting period 01/01/25 to 12/31/25	Residents are referred by NYCHA staff from multiple departments, including REES, through a web-based system that notifies providers to engage with a referred resident. There are no minimum criteria other than the resident's consent to participate in the service provision.	Services provided at partner locations	Public Housing / Section 8
NYCHA Resident Training Academy (NRTA): Provides employment-focused training and job placement assistance to NYCHA residents in the constructional and janitorial fields (supported by the Robin Hood Foundation)	274 graduates in the NRTA program year as of reporting period 01/01/25 to 12/31/25	Public housing residents are recruited through multiple outreach channels and complete an initial pre-screen with REES staff. Program	City Technical College/ Brooklyn Workforce Innovations	Public Housing and NYCHA Section 8 Residents

		referrals are based on testing, pre-screening, interest, and other eligibility requirements and qualifications.		

2) Family Self Sufficiency Program

a. Participation Description

Program	Actual Number of Enrolled Participants (As of: 12/31/25)
Public Housing	0
Section 8	417

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

Since the fall of 2010, REES has operated the Family Self-Sufficiency (FSS) program. As of December 31, 2025, the program has 417 participants, of whom 275 have escrow accounts totaling $1,938,340. In 2025, the program enrolled 73 participants and graduated 34 residents disbursing a total of $477,366. In 2025, NYCHA's REES offered morning and evening in-person and/or virtual FSS Information Sessions twice monthly to inform residents about the program and start the enrollment process. Goal setting and ongoing case management were provided to enrolled residents.

C. Welfare Benefit Reductions

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

☒ Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
☒ Informing residents of new policy on admission and reexamination
☒ Actively notifying residents of new policy at times in addition to admission and reexamination.

☒ Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
☒ Establishing a protocol for exchange of information with all appropriate TANF agencies
☐ Other: (list below)

8. Safety and Crime Prevention / VAWA

[24 CFR Part 903.7 (m)]

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

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

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

NYCHA recognizes the need to ensure the safety of public housing residents and works closely with the New York City Police Department's Housing Bureau to enhance quality of life and to provide for a safe environment. The Housing Bureau has developed a one-year plan designed to increase the safety and security of residents of public housing. The Strategic Plan for the New York City Police Department's Housing Bureau is included in the Supporting Documents of the Annual Plan.

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

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

3. Which developments are most affected? (list below)
The Strategic Plan for the New York City Police Department's Housing Bureau is included in the Supporting Documents of the Annual Plan.

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

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

☐ Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities

☒ Crime Prevention Through Environmental Design

☒ Activities targeted to at-risk youth, adults, or seniors

☒ Volunteer Resident Patrol/Block Watchers Program

☐ Other (describe below)

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

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

C. Coordination between PHA and the police

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

☒ Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan

☒ Police provide crime data to housing authority staff for analysis and action

☒ Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)

☒ Police regularly testify in and otherwise support eviction cases

☒ Police regularly meet with the PHA management and residents

☒ Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services

☐ Other activities (list below)

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

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

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

NYCHA makes referrals to the following organizations:

- **Sanctuary for Families** is a New York City-based non-profit organization dedicated to aiding victims of domestic violence and their children. Its services include crisis intervention, emergency and transitional shelter, legal assistance and representation, adult and child counseling, and long-term follow-up. Its Legal Center is one of the largest providers of free legal services exclusively for victims of domestic violence, sex trafficking, and other forms of gender-based violence in the United States.
- **Safe Horizon** is a victim assistance organization designed to provide support, prevent violence, and promote justice for victims of crime and abuse. Its programs help survivors of domestic violence rebuild their lives through counseling, short term housing, legal and other support. Residents are encouraged to call their 24-hour hotline, 1-800-621-HOPE (4673) to be connected to a qualified professional

- **Project SAFE** offers services for those who have experienced a crime in which the security of their home has been compromised.
- **Local District Attorney's Offices** assist individuals impacted by domestic violence and prosecute misdemeanor and felony cases involving domestic partners.
- **Brooklyn Defender Services**: Staffed with attorneys and support staff, including social workers, investigators, paralegals, re-entry specialists, jail liaisons, education, community organizers and policy specialists as well as dedicated advocates for youth, veterans and parents. They serve their clients in the courtroom and in the community, defending their rights and helping them to amplify their voices to call for the changes that they see are necessary for the health and success of their neighborhoods.
- **P**revention **A**ssistance and **T**emporary **H**ousing (**PATH**): People who leave unsafe environments and need temporary shelter can get help through PATH.
- **CAMBA** provides violence prevention and intervention services to victims, survivors, and their families. Clients must be a Brooklyn resident involved with or at risk of victimization and violence. CAMBA supports the Office of Victim Service compensation claims through advocacy, accompaniment, information, and referral assistance. They conduct prevention education and awareness workshops on intimate partner violence and sexual assault, dating violence, and safety to middle and high school students, as well as bystander prevention, and sexual violence awareness education on college and university campuses. They also assist victims of all crimes, including intimate partner violence & abuse, sexual assault, gun violence, and homicide. In addition, they manage a 24-hour, 7-days a week sexual assault crisis hotline.
- **East New York Family Center Brooklyn Community Services**: Families come to the BCS East New York Family Center (ENYFC) for support with marital or other familial conflicts, and to assist with their children's social-emotional challenges or issues at school. Often, these families are coping with trauma, illness, loss, family changes or transitions, and disconnection. The ENYFC is a safe space for families to set clear goals for change while drawing from their own strengths and abilities. Through this program, social workers provide family therapy, case management support, client advocacy workshops, and group sessions with parents, children and teens.
- **Good Shepherd Services - Safe Homes Project:** For over 40 years, Good Shepherd Services' Safe Homes Project has been working to confront and eliminate domestic and partner violence in New York City. They provide a full array of services, which include a hotline, counseling, and safety planning. In addition, they offer a wide range of consultation, training, and educational services to community and professional groups and work to improve laws and policies affecting survivors. They also provide targeted services for special populations, including Spanish-speakers, youth, and LGBTQ survivors of partner violence. All services are free and offered in both English and Spanish.
- **The Mayor's Office to End Domestic and Gender Based Violence (ENDGBV):** Develops policies and programs, provides training and prevention education, conducts research and evaluations, performs community outreach, and operates the New York City Family Justice Centers. ENDGBV collaborates with City agencies and community stakeholders to ensure access to inclusive services for survivors of domestic and gender-based violence (GBV). GBV can include intimate partner and family violence, elder abuse, sexual assault, stalking, and human trafficking
- **W.A.R.M (We All Really Matter):** Through prevention, intervention, and awareness rooted in lived experience, WARM is committed to planting deep seeds of life to rebuild, restore, and

reconnect with domestic violence victims and survivors. WARM empowers domestic violence victims and survivors to reclaim their power by sharing its own experiences and providing victims and survivors with the resources and tools to flourish.

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

NYCHA makes referrals to the following organizations in addition to the organizations listed in the previous pages in Section D on pages 91 to 92:

- **New York City Family Justice Centers** are the outgrowth of the Mayor's Office to End Domestic and Gender Based Violence (ENDGBV) and the District Attorneys' offices. During business hours (M-F, 9am-5pm), residents can call any New York City Family Justice Center (FJC) to get connected to free and confidential assistance for victims and survivors of domestic and gender-based violence, which can include sexual violence, human trafficking, stalking, and intimate partner violence. Through any NYC FJC, survivors of domestic and gender-based violence and their children can get connected to organizations that provide case management, economic empowerment, counseling, civil legal, and criminal legal assistance. Located in all five boroughs, FJCs are safe, caring environments that provide one-stop services and support. Key City agencies, community, social and civil legal services providers, and District Attorney's Offices are located on-site at FJCs, to make it easier for survivors to get help. All are welcome regardless of language, income, gender identity, or immigration status. Interpretation services are available at every FJC, and locations are wheelchair accessible. Requests for other accommodations can be done by calling ahead of a visit.

- The NYC AGING FKA **Department for The Aging (DFTA**) offers services through funded elder abuse organizations.

- **Adult Protective Services (APS**) – Vulnerable adults who are being abused, neglected and/or financially exploited are referred to APS for more intensive ongoing support.

F. Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families

NYCHA Departments:

- NYCHA's Family Partnerships department offers assistance, guidance, information and referrals to NYCHA resident survivors of intimate partner violence, sex trafficking and elder abuse.
- NYCHA's Applications and Tenancy Administration Department prioritizes all emergency transfer requests for VAWA victims.

Events:

- Annual Domestic Violence Awareness month conference.

- DV/EA agencies are routinely invited to table at NYCHA resource fairs/outreach events/Family Days, etc.
- NYCHA participates in the Mayor's Office to End Domestic and Gender Based Violence Fatality Review Committee.

G. Violence Against Women Act (VAWA)

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

9. Pet Policy

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

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

3. **Registration**
   All tenants must register their dog, cat, or assistance animal with NYCHA within 30 days of acquiring (i) during the lease-up process (new tenants); (ii) as soon as the tenant acquires a dog, cat, or assistance animal; or (iii) when a tenant is adding a new pet or assistance animal to replace a pet or assistance animal that is no longer in the household (e.g. the animal has passed away), the tenant must complete and submit a NYCHA form and submit the Animal Removal Agreement. **Any** dog, cat or assistance animal that is not registered with NYCHA is prohibited from living in a NYCHA apartment or NYCHA premises.

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

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

   Service animals and support animals must be registered with NYCHA.

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

7. **Dangerous Animals**
   NYCHA prohibits (1) unconventional pets or endangered animals such as barnyard animals (farm animals including, but not limited to, cattle, horses, chickens, turkeys, ducks, geese, pigs, goats, and sheep), reptiles, arachnids (spiders), monkeys), and other animals, as

specified by New York State and New York City local laws and health code; and (2) animals deemed dangerous, vicious, or threatening also are prohibited. Registered pets or assistance animals that are or become dangerous, vicious, or threatening are not permitted and must be removed from the apartment.

8. **Pet and Assistance Animal Conduct**
   Tenants must control the noise of pets and assistance animals so that it does not become a nuisance to other tenants by interrupting their peaceful enjoyment of their apartment or the development premises. A pet must not injure, cause harm to, or threaten other people. A pet must not damage NYCHA property or premises, including buildings (inside or outside an apartment), elevators, common grounds, trees, shrubs or ground cover. This rule also applies to assistance animals.

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

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

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

12. **Spay/Neuter**
    Dogs cats, and assistance animals must be spayed or neutered. Proof must be submitted with the NYCHA Pet Registration form.

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

14. **Fee Exemptions**
    No fees required.

10. Civil Rights Certification

[24 CFR Part 903.7 (o)]

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

11. Fiscal Year Audit

[24 CFR Part 903.7 (p)]

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

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

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

4. If there were any findings, do any remain unresolved? If yes, how many unresolved findings remain?
   ☒ Yes ☐ No

As described in the Findings related to the Financial Statements Reported in accordance with Government Auditing Standards, the auditors identified two significant deficiencies in internal control over financial reporting (2024-001A, 2024-001B) as follows:

- Finding Number 2024-001A, the Authority did not adequately accrue transactions related to capital invoices received after year end, resulting in an understatement of both capital assets and accrued liabilities.
- Finding Number 2024-001B, the Authority inappropriately capitalized expenses related to GASB 49, resulting in an overstatement of capital asset balances.

As described in the Schedule of Findings and Questioned Costs relating to Federal Awards of the Single Audit Report, the Authority did not comply with certain requirements regarding Assistance Listing No. 14.850 Public and Indian Housing (2024-001, 2024-002) as follows:

- Finding number 2024-001 for Special Tests and Provisions – Environmental Contaminants Testing and Remediation has been categorized as a material deficiency in compliance and is a recurring finding. Finding number 2024-002 for Eligibility has been categorized as a low-grade compliance deficiency and is a recurring finding. During the Single Audit, Deloitte noted that the Authority did not ensure that all required eligibility forms were included in case files (10 of the 540 eligibility forms requested could not be located).

As described in the Schedule of Findings and Questioned Costs relating to Federal Awards of the Single Audit Report, the Authority did not comply with certain requirements regarding Assistance Listing No. 14.871 Section 8 Housing Choice Vouchers (2024-003, 2024-004) as follows:

- Finding number 2024-003 for Eligibility which has been categorized as a significant compliance deficiency. During the Single Audit, Deloitte noted that the Authority did not ensure that all required eligibility forms were obtained from the tenants and included in the case files.

- Finding number 2024-004 for Special Performance which has been categorized as a low-grade compliance deficiency. During the Single Audit, Deloitte noted the Authority did not ensure that all required critical information for HUD-50058 forms were obtained from the tenants and included in the case files.

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

12. Asset Management

[24 CFR Part 903.7 (q)]

1. Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock, including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have not been addressed elsewhere in this PHA Plan?
   ☐ Yes ☒ No

   Please see Attachment B on pages 99 to 174 for information on NYCHA's activities related demolition and disposition, conversion of public housing, homeownership, project-based vouchers and PACT. Please see page 175 for the information on NYCHA's Capital Fund Grant.

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

ATTACHMENT B
DEMOLITION AND/OR DISPOSITION, CONVERSION OF PUBLIC HOUSING, HOMEOWNERSHIP, PROJECT-BASED VOUCHERS AND RENTAL ASSISTANCE DEMONSTRATION (RAD)

A) Demolition and/or Disposition

Infill Housing Developments

Fulton, Elliott, Chelsea, and Chelsea Addition- Manhattan -
In 2019, NYCHA launched an unprecedented, years-long resident engagement campaign at Fulton and Elliott-Chelsea Houses, and in 2021, the Authority worked with resident leaders to issue a Request for Proposal (RFP) to identify a partner team. For the first time in NYCHA's history, a Resident Review Committee was formed and ultimately selected a PACT partner to provide much-needed upgrades and quality of life improvements to their homes through the PACT program. In 2022, building assessments revealed extensive, advanced deterioration that would increase the cost of a renovation project. In mid-2023, following intensive engagement to understand residents' preferred path forward, a new proposal was announced that would rebuild all 2,056 existing units with brand-new, enhanced homes and create up to 3,454 new mixed-income units and new community facilities and public spaces, while maintaining resident rights and protections. The vast majority of residents, or 94 percent of all households, would be able to stay in their current apartments while their new homes are built; the remaining six percent of households would be temporarily relocated to refreshed apartments within the campuses.

The NYCHA Board approved the Master Development Agreement in October 2024, and a Bridge Plan has been enacted for the PACT partner to provide additional security, pest control, building system repairs, and common area and in-unit repairs across the campuses before and during the construction of the new buildings.

A Final Environmental Impact Statement was released in late summer 2025, with the financial closing of the first phase to follow.

Transfer of Assistance
Through Transfer of Assistance, NYCHA is using the RAD program to transfer assistance and households from Section 9 public housing into newly built or rehabilitated Project-Based Section 8 units in a new location. This will allow NYCHA to leverage development partnerships on both NYCHA-owned sites as well as private sites and expand our portfolio through the development of more low-income, affordable housing for existing public housing residents,

Eligible NYCHA households participating in Transfer of Assistance will have the opportunity to apply to live in a new Section 8 unit and retain the same basic rights as in the public housing program, and if selected, transfer directly into the new building through the Rental Assistance Demonstration program as a Project-Based Section 8 participant.

For transactions identified below utilizing HUD's RAD Transfer of Assistance program, NYCHA intends to submit a development proposal to HUD to restore Public Housing funding to the originating units that are converting to RAD by redeveloping them as public housing through one of the available development methods and by utilizing NYCHA's available Faircloth authority.

New 100% Affordable Housing Developments

Harborview Terrace, Manhattan – NYCHA intends to lease a parcel of approximately 29,000 square feet on Block 1084, Lot 9, for construction of a new housing development. NYCHA in collaboration with HPD issued an RFP in 2017. No engagement activities are currently taking place.

Bushwick II CDA (Group E), Brooklyn – NYCHA has leased a parcel of approximately 12,300 square feet on Block 3325, Lot 1, for construction of an affordable senior housing development with 152 units. A developer was designated in 2019. Construction began in 2022, after the project received Section 18 approval. Among total 152 units, 27 units were made available for NYCHA residents. Construction is now complete.

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

Morris I & II Houses, Bronx – NYCHA intends to lease a parcel of approximately 13,000 square feet on Block 2902, Lot 36, for construction of a senior affordable housing development with approximately 150-200 units. NYCHA issued an RFP in collaboration with HPD in 2019 and selected a development team in collaboration with HPD in 2022. Engagement with residents is ongoing. The new building will also provide new housing for existing NYCHA residents. Through Transfer of Assistance, eligible Morris households will have the opportunity to apply for a subset of units in the new building.

Kingsborough Houses & Kingsborough Houses Extension, Brooklyn – NYCHA intends to lease a parcel of approximately 18,000 square feet on Block 1344, Lots 1 and 175, for construction of an affordable senior housing development with approximately 150-200 units. NYCHA issued an RFP in collaboration with HPD in 2019 and selected a development partner in 2024. Engagement with residents is ongoing. The new building will also provide new housing for existing NYCHA residents. Through Transfer of Assistance, eligible Kingsborough households will have the opportunity to apply for a subset of units in the new building.

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

Phase III development for the church. Section 18 application submission dates for the third phase, as well as construction start dates, have not yet been finalized.

Ocean Bay Apartments (Oceanside), Queens – NYCHA intends to dispose of parcels of land and an existing, vacant, one-story commercial buildings to facilitate construction of a mixed-use building featuring approximately 105 units of affordable housing. The existing vacant retail structures will be demolished and replaced with affordable housing with ground floor retail and community facility uses. The new building will also provide new housing for existing NYCHA residents. Through Transfer of Assistance, eligible Ocean Bay Apartments (Oceanside) households will have the opportunity to apply for a subset of units in the new building.

The parcels are located on Beach Channel Drive between Beach 53rd and Beach 54th Streets south of Oceanside Apartments and east of Bayside Apartments. NYCHA acquired the property, a blighted and underused shopping strip opposite Ocean Bay Apartments (Oceanside) consisting of seven contiguous parcels of approximately 37,111 square feet total, as part of the Ocean Bay HOPE VI Plan through eminent domain. Section 18 and RAD application submission dates, as well as construction start dates, have not yet been finalized.

1678 Park Avenue, Manhattan – NYCHA, in partnership with L+M Development Partners and MDG Design + Construction, intends to build a 100% affordable housing for NYCHA residents on a private site in East Harlem, Manhattan. The proposal will build a total of 221 residential units and a superintendent unit, and is anticipated to provide retail and commercial spaces, gym, community space for residents, parking, and outdoor amenities. Through Transfer of Assistance, eligible households from the following nearby developments will have the opportunity to apply for a unit in the new building: Mitchel, Drew-Hamilton, and Lincoln.

Other Development Activities

US Army Corps of Engineers Jamaica Bay Flood Protection Project – To enhance coastal resiliency along the vulnerable, low-lying shoreline of Far Rockaway's bay side, the US Army Corps of Engineers (US ACE) is working to elevate the shoreline. The flood protection project intersects NYCHA's Beach 41st St development and will require an easement between NYCHA and US ACE. The agreement will allow US ACE to build preventative measures on NYCHA land to guard against potentially widespread flood damage. The timeline for this project, and submission dates for related HUD approvals, have not yet been finalized.

MTA Easement at Wagner Houses – NYCHA plans for a disposition to the Metropolitan Transportation Authority (MTA) of a permanent subsurface easement located within the NYCHA public housing development Wagner Houses. The proposed disposition of the approximately 19,314 square feet permanent subsurface easement appurtenant to the development will facilitate the expansion of the MTA's Second Avenue Subway. The added capacity of the Second Avenue Subway will provide much-needed transit access to residents of the development as well as to all residents of the community and will improve service. Section 18 application materials were submitted and approved in March 2025. The construction start date has not yet been finalized.

PSS Grandparent Family Apartments – NYCHA intends to reposition one 50-unit residential building owned by West Side Federation for Supportive & Senior Housing (WSFSSH) from Section 9 to Section 8 subsidy through the termination of the existing Mixed-Finance structure for this building or through a Section 18 disposition. This repositioning will allow for WSFSSH to continue to own and manage the building and receive Project-Based Section 8 subsidy. The materials for Mixed-Finance unwinding were submitted for HUD approval in 2025. HUD issued a Section 18 disposition approval letter for this project in May 2026.

Randolph Houses – NYCHA intends to reposition 168 units in a residential building owned by Trinity Financial from Section 9 to Section 8 subsidy through the termination of the existing Mixed-Finance structure for this building or through a RAD conversion. This conversion will allow Trinity Financial to continue to own the building and Wavecrest Management to continue to manage the building and receive Project-Based Section 8 subsidy. The timeline for submission to HUD and the conversion are to be finalized.

Lavanburg Homes – NYCHA intends to dispose of the 104-unit residential building previously operated by Henry Street Settlement as a Department of Homeless Services Shelter (DHS) in the Lower East Side. Disposition through Section 18 and renovation timelines are to be finalized.

Transfer of Development Rights

College Avenue – East 165 Street, Bronx – NYCHA intends to dispose of approximately 12,000 square feet of surplus development rights through a zoning lot merger. The proposed transfer of development rights (TDR) will facilitate a new residential housing development and generate funding to make repairs at the College Avenue-East 165th Street development.

Howard Houses, Brooklyn – In 2025, NYCHA disposed of a parcel of land of approximately 4,560 square feet, and approximately 23,360 square feet of additional surplus development rights through a zoning lot merger. The land sale and TDR facilitated the construction of an affordable housing development and new housing for NYCHA residents. Through Transfer of Assistance, eligible Howard households will have the opportunity to apply for a subset of units in the new building.

Harborview Terrace, Manhattan – NYCHA recently received a proposal to dispose of approximately 90,000 square feet of surplus development rights and potentially a small parcel of land associated with Harborview Terrace through a zoning lot merger. The proposed transaction would generate revenue for NYCHA. NYCHA intends to engage with residents at Harborview to discuss this project further.

Demolition and/or Disposition

[24 CFR Part 903.7 (h)]

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

City-Wide

Disposition Activity Description
1a. Development name: **FHA Repossessed Houses ("FHA Homes")**
1b. Development (project) number: **NY005012090**

2. Activity type:
☐ Demolition
☒ Disposition

NYCHA intends to dispose of a subset of FHA Homes across the city. All homes in the FHA portfolio are listed below. NYCHA is currently working closely with individuals in occupied homes to determine the appropriate path forward for each household.

Occupied Properties:

Block	*Lot*	*Address*
10873	*24*	*100-38 FRANCIS LEWIS BOULEVARD, QUEENS VILLAGE, NY 11429*
10365	*28*	*102-36 187TH STREET, HOLLIS, NY 11423*
10368	*60*	*104-06 FARMERS BOULEVARD, HOLLIS, NY 11423*
10922	*17*	*104-10 212TH STREET, QUEENS VILLAGE, NY 11429*
10162	*25*	*104-14 164TH PLACE, JAMAICA, NY 11433*
10915	*20*	*104-28 209TH STREET, QUEENS VILLAGE, NY 11429*
10241	*19*	*105-11 171ST PLACE, JAMAICA, NY 11433*
9612	*68*	*107-27 132ND STREET, SOUTH RICHMOND HILL, NY 11419*
10167	*16*	*107-29 164TH STREET, JAMAICA, NY 11433*
10173	*24*	*108-15 164TH PLACE, JAMAICA, NY 11433*
11113	*36*	*109-20 212TH STREET, QUEENS VILLAGE, NY 11429*
11610	*57*	*109-33 130TH STREET, SOUTH OZONE PARK, NY 11420*
10197	*51*	*110-15 169TH STREET, JAMAICA, NY 11433*
10947	*41*	*110-16 207TH STREET, QUEENS VILLAGE, NY 11429*
11129	*28*	*110-26 216TH STREET, QUEENS VILLAGE, NY 11429*
11964	*294*	*111-21 147TH STREET, JAMAICA, NY 11435*
10966	*222*	*111-27 207TH STREET, QUEENS VILLAGE, NY 11429*
10967	*159*	*111-32 209TH STREET, QUEENS VILLAGE, NY 11429*
11960	*20*	*111-37 144TH STREET, JAMAICA, NY 11435*
12170	*23*	*111-46 156TH STREET, JAMAICA, NY 11433*
10985	*11*	*112-23 208TH STREET, QUEENS VILLAGE, NY 11429*
10994	*20*	*113-30 200TH STREET, SAINT ALBANS, NY 11412*
10999	*75*	*113-32 205TH STREET, SAINT ALBANS, NY 11412*
11020	*21*	*114-39 203RD STREET, SAINT ALBANS, NY 11412*
11968	*50*	*114-42 139TH STREET, JAMAICA, NY 11436*
11975	*32*	*114-54 INWOOD STREET, JAMAICA, NY 11436*
11975	*142*	*114-69 145TH STREET, JAMAICA, NY 11436*
11678	*60*	*115-21 135TH STREET, SOUTH OZONE PARK, NY 11420*

11052	*60*	*115-22 210TH STREET, CAMBRIA HEIGHTS, NY 11411*
11051	*23*	*115-27 208TH STREET, CAMBRIA HEIGHTS, NY 11411*
11991	*17*	*115-52 147TH STREET, JAMAICA, NY 11436*
11058	*15*	*116-17 FARMERS BOULEVARD, SAINT ALBANS, NY 11412*
12609	*45*	*117-11 192ND STREET, SAINT ALBANS, NY 11412*
12634	*29*	*117-17 204TH STREET, SAINT ALBANS, NY 11412*
11696	*16*	*117-22 133RD STREET, SOUTH OZONE PARK, NY 11420*
12015	*164*	*117-24 143RD STREET, JAMAICA, NY 11436*
12609	*34*	*117-37 192ND STREET, SAINT ALBANS, NY 11412*
12639	*54*	*118-03 204TH STREET, SAINT ALBANS, NY 11412*
12624	*61*	*118-15 199TH STREET, SAINT ALBANS, NY 11412*
12621	*18*	*118-22 197TH STREET, SAINT ALBANS, NY 11412*
12027	*49*	*119-01 146TH STREET, JAMAICA, NY 11436*
12025	*77*	*119-44 INWOOD STREET, JAMAICA, NY 11436*
12482	*142*	*120-26 178TH STREET, JAMAICA, NY 11434*
12817	*53*	*120-56 233RD STREET, CAMBRIA HEIGHTS, NY 11411*
12706	*38*	*122-28 191ST STREET, SPRINGFIELD GARDENS, NY 11413*
12058	*205*	*129-04 142ND STREET, JAMAICA, NY 11436*
11771	*45*	*129-37 132ND STREET, SOUTH OZONE PARK, NY 11420*
12109	*66*	*130-34 147TH STREET, JAMAICA, NY 11436*
11781	*285*	*131-27 135TH PLACE, SOUTH OZONE PARK, NY 11420*
12115	*28*	*133-11 148TH STREET, JAMAICA, NY 11436*
11698	*35*	*134-17 120TH AVENUE, SOUTH OZONE PARK, NY 11420*
13033	*32*	*137-24 219TH STREET, SPRINGFIELD GARDENS, NY 11413*
10019	*11*	*138-20 102ND AVENUE, JAMAICA, NY 11435*
1965	*75*	*143 GATES AVENUE, BROOKLYN, NY 11238*
12115	*33*	*148-06 133RD AVENUE, JAMAICA, NY 11436*
12103	*71*	*148-13 SUTTER AVENUE, JAMAICA, NY 11436*
15502	*2*	*1502 BEACH 12TH STREET, FAR ROCKAWAY, NY 11691*
12202	*19*	*150-36 116TH ROAD, JAMAICA, NY 11434*
15502	*3*	*1504 BEACH 12TH STREET, FAR ROCKAWAY, NY 11691*
15902	*46*	*153 BEACH 59TH STREET, ARVERNE, NY 11692*
10282	*58*	*171-28 111TH AVENUE, JAMAICA, NY 11433*
12591	*227*	*173-09 143RD ROAD, JAMAICA, NY 11434*
12522	*108*	*174-36 126TH AVENUE, JAMAICA, NY 11434*
12462	*19*	*178-14 BAISLEY BOULEVARD, JAMAICA, NY 11434*
13075	*67*	*180-15 144TH AVENUE, JAMAICA, NY 11434*
2073	*46*	*182 ADELPHI STREET, BROOKLYN, NY 11205*
10415	*6*	*184-12 GALWAY AVENUE, SAINT ALBANS, NY 11412*
13042	*108*	*184-20 EDGEWOOD AVENUE, SPRINGFIELD GARDENS, NY 11413*
10420	*80*	*187-24 KEESEVILLE AVENUE, SAINT ALBANS, NY 11412*
10420	*36*	*188-23 LEWISTON AVENUE, SAINT ALBANS, NY 11412*
10923	*27*	*190-15 109TH ROAD, SAINT ALBANS, NY 11412*
12646	*9*	*190-18 119TH AVENUE, SAINT ALBANS, NY 11412*
12670	*8*	*191-18 120TH AVENUE, SAINT ALBANS, NY 11412*
11011	*60*	*194-17 114TH DRIVE, SAINT ALBANS, NY 11412*
12732	*9*	*197-22 122ND AVENUE, SPRINGFIELD GARDENS, NY 11413*
10981	*139*	*205-20 112TH AVENUE, SAINT ALBANS, NY 11412*
11124	*53*	*209-47 112TH AVENUE, QUEENS VILLAGE, NY 11429*
11134	*18*	*213-24 NASHVILLE BOULEVARD, QUEENS VILLAGE, NY 11429*
11141	*70*	*215-32 112TH AVENUE, QUEENS VILLAGE, NY 11429*
11120	*1*	*217-09 110TH AVENUE, QUEENS VILLAGE, NY 11429*
10772	*21*	*219-30 102ND AVENUE, QUEENS VILLAGE, NY 11429*
12825	*102*	*223-20 FRANCIS LEWIS BOULEVARD, CAMBRIA HEIGHTS, NY 11411*
15782	*51*	*239 FERNSIDE PLACE, FAR ROCKAWAY, NY 11691*

4781	*29*	*3027 EDSON AVENUE, BRONX, NY 10469*
4070	*24*	*341 BERRIMAN STREET, BROOKLYN, NY 11208*
4070	*19*	*353 BERRIMAN STREET, BROOKLYN, NY 11208*
943	*69*	*367 DOUGLASS STREET, BROOKLYN, NY 11217*
3512	*39*	*447 EFFINGHAM AVENUE, BRONX, NY 10473*
4454	*30*	*458 ATKINS AVENUE, BROOKLYN, NY 11208*
1889	*36*	*71 WAVERLY AVENUE, BROOKLYN, NY 11205*
3874	*7*	*733 SNEDIKER AVENUE, BROOKLYN, NY 11207*
1889	*34*	*75 WAVERLY AVENUE, BROOKLYN, NY 11205*

Vacant Properties:

Block	*Lot*	*Address*
10903	*42*	*104-33 203RD STREET, SAINT ALBANS, NY 11412*
10378	*41*	*105-36 FARMERS BOULEVARD, SAINT ALBANS, NY 11412*
11208	*49*	*110-05 225TH STREET, QUEENS VILLAGE, NY 11429*
10954	*41*	*111-19 196TH STREET, SAINT ALBANS, NY 11412*
10989	*105*	*113-14 196TH STREET, SAINT ALBANS, NY 11412*
11016	*26*	*114-42 200TH STREET, SAINT ALBANS, NY 11412*
11014	*27*	*114-44 198TH STREET, SAINT ALBANS, NY 11412*
11058	*7*	*116-31 FARMERS BOULEVARD, SAINT ALBANS, NY 11412*
12469	*156*	*119-55 177TH STREET, JAMAICA, NY 11434*
12048	*97*	*123-19 145TH STREET, JAMAICA, NY 11436*
11759	*55*	*124-18 135TH PLACE, SOUTH OZONE PARK, NY 11420*
11781	*292*	*131-41 135TH PLACE, SOUTH OZONE PARK, NY 11420*
12984	*26*	*132-19 BENNETT COURT, JAMAICA, NY 11434*
12928	*78*	*132-33 218TH STREET, SPRINGFIELD GARDENS, NY 11413*
13022	*85*	*137-22 WESTGATE STREET, SPRINGFIELD GARDENS, NY 11413*
11954	*78*	*138-11 LINDEN BOULEVARD, JAMAICA, NY 11436*
13179	*27*	*138-17 230TH PLACE, SPRINGFIELD GARDENS, NY 11413*
11925	*82*	*139-10 109TH ROAD, JAMAICA, NY 11435*
4609	*13*	*140 EAST 91ST STREET, BROOKLYN, NY 11212*
10201	*12*	*163-34 CLAUDE AVENUE, JAMAICA, NY 11433*
12340	*68*	*165-17 116TH AVENUE, JAMAICA, NY 11434*
10284	*18*	*174-16 111TH AVENUE, JAMAICA, NY 11433*
12438	*138*	*186-10 FOCH BOULEVARD, SAINT ALBANS, NY 11412*
12665	*31*	*188-56 120TH ROAD, SAINT ALBANS, NY 11412*
11012	*43*	*194-47 115TH AVENUE, SAINT ALBANS, NY 11412*
11039	*4*	*198-15 116TH AVENUE, SAINT ALBANS, NY 11412*
12778	*124*	*218-34 119TH AVENUE, CAMBRIA HEIGHTS, NY 11411*
11235	*46*	*219-30 MURDOCK AVENUE, QUEENS VILLAGE, NY 11429*
13099	*24*	*220-23 135TH AVENUE, SPRINGFIELD GARDENS, NY 11413*
4070	*16*	*359 BERRIMAN STREET, BROOKLYN, NY 11208*
3509	*25*	*444 TORRY AVENUE, BRONX, NY 10473*

Vacant Lot:

Block	*Lot*	*Address*
11208	*46*	*N/A 225th Street, Queens Village, NY 11429*

3. Application status (select one)

☐ Approved

☐ Submitted, pending approval

☒ Planned application

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

5. Number of units affected: 0 units (commercial use, non-residential)

6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: 2025 b. **Actual** end date of activity: **TBD**

BRONX

Demolition/Disposition Activity Description
1a. Development name: **Bronx River Addition** 1b. Development (project) number: **NY005010320**
2. Activity type: ☐ Demolition ☒ Disposition *Through the NYC Public Housing Preservation Trust, NYCHA plans to comprehensively renovate Bronx River Addition to address the 20-year needs of the development, with rehabilitation to start in 2026. The Trust will identify a Design-Build partner to complete the capital work and NYCHA will provide property management services to the development.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date original application approved, submitted, or **planned for submission: 2026**
5. Number of units affected: 226 units 6. Coverage of action (select one) ☐ Part of the development ☒ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: **2024** b. **Projected** end date of activity: **TBD**

Disposition Activity Description
1a. Development name: **College Avenue–East 165 Street** 1b. Development (project) number: **NY005013080**
2. Activity type: ☐ Demolition ☒ Disposition *Transfer of surplus development rights to an adjacent housing development site for a new residential building.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date application approved, submitted, or **planned for submission: TBD**
5. Number of units affected: 0
6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: 2020 b. **Projected** end date of activity: **TBD**

Disposition Activity Description
1a. Development name: **East 173rd Street-Vyse Avenue Houses** 1b. Development (project) number: **NY005015300**
2. Activity type: ☐ Demolition ☒ Disposition *Development of a total 224 dwelling units, including 56 senior citizen apartments in three phases: Phase I an 84-unit apartment building, Phase II an 84-unit apartment building, and phase III a 56-unit apartment building, following relocation of an existing community facility.*
3. Application status (select one) ☒ Approved ☐ Submitted, pending approval ☐ Planned application
4. Date application **approved**, submitted, or planned for submission: November **14, 2009**
5. Number of units affected: 0 6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: **November 21, 2008** b. **Projected** end date of activity: **TBD**

Disposition Activity Description
1a. Development name: **Morris I & II Houses** 1b. Development (project) number: **NY005011020**
2. Activity type: ☐ Demolition ☒ Disposition *Lease of an approximate 13,000 square foot parcel on Block 2902 Lot 36 with development rights for affordable housing development and Transfer of Assistance.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date original application approved, submitted, or **planned for submission: 2025**
5. Number of units affected: 0 6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: 2019 b. **Projected** end date of activity: **TBD**

Disposition Activity Description
1a. Development name: **PSS Grandparent Family Apartments** 1b. Development (project) number: **NY005005600**
2. Activity type: ☐ Demolition ☒ Disposition *Disposition of one 50-unit building on Block 2678, Lot 68*
3. Application status (select one) ☒ Approved ☐ Submitted, pending approval ☐ Planned application
4. Date application **approved**, submitted, or planned for submission: **2026**
5. Number of units affected: 50 6. Coverage of action (select one) ☐ Part of the development ☒ Total development
7. Timeline for activity: a. Actual or projected start date of activity: **2023** b. Actual end date of activity: TBD

BROOKLYN

Disposition Activity Description
1a. Development name: **Bushwick II CDA (Group E)** 1b. Development (project) number: **NY005012470**
2. Activity type: ☐ Demolition ☒ Disposition *Lease of a parcel of approximately 12,300 square feet on a portion of Block 3325, Lot 1 for development of affordable senior housing.*
3. Application status (select one) ☒ Approved ☐ Submitted, pending approval ☐ Planned application
4. Date original application **approved,** submitted, or planned for submission: **2022**
5. Number of units affected: 0
6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: 2017 b. **Projected** end date of activity: **2025**

Disposition Activity Description
1a. Development name: **Coney Island I (Site 1B) (also known as Unity Towers)** 1b. Development (project) number: **NY005011660**
2. Activity type: ☐ Demolition ☒ Disposition *Through the NYC Public Housing Preservation Trust, NYCHA plans to comprehensively renovate Coney Island I (Site 1B) to address the 20-year needs of the development, with rehabilitation work to start in 2027. The Trust will identify a Design-Build partner to complete the capital work and NYCHA will provide property management services to the development.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date original application approved, submitted, or **planned for submission**: TBD
5. Number of units affected: 193
6. Coverage of action (select one) ☐ Part of the development ☒ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: 2025 b. Projected end date of activity: TBD

Disposition Activity Description
1a. Development name: **Howard Houses** 1b. Development (project) number: **NY005000720**
2. Activity type: ☐ Demolition ☒ Disposition *Transfer of surplus development rights and potentially a small piece of land to an adjacent site for affordable housing development and Transfer of Assistance.*
3. Application status (select one) ☒ Approved ☐ Submitted, pending approval ☐ Planned application
4. Date application **approved**, submitted, or planned for submission**: 2025**
5. Number of units affected: 0
6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: 2024 b. **Projected** end date of activity: **TBD**

Disposition Activity Description
1a. Development name: **Hylan** 1b. Development (project) number: **NY005010860**
2. Activity type: ☐ Demolition ☒ Disposition *Through the NYC Public Housing Preservation Trust, NYCHA plans to comprehensively renovate Hylan to address the 20-year needs of the development, with rehabilitation work to start in 2027. The Trust will identify a Design-Build partner to complete the capital work and NYCHA will provide property management services to the development.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date original application approved, submitted, or **planned for submission**: TBD
5. Number of units affected: 815
6. Coverage of action (select one) ☐ Part of the development ☒ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: **2025** b. Projected end date of activity: TBD

Disposition Activity Description
1a. Development name: **Kingsborough Houses and Kingsborough Houses Extension** 1b. Development (project) number: **NY005010100**
2. Activity type: ☐ Demolition ☒ Disposition *Lease of an approximate 18,000 square foot parcel on Block 1344 Lots 1 and 175 with development rights for affordable housing development and Transfer of Assistance.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date original application approved, submitted, or **planned for submission: 2025**
5. Number of units affected: 0 6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: 2019 b. **Projected** end date of activity: **TBD**

Disposition Activity Description
1a. Development name: **Nostrand** 1b. Development (project) number: **NY005010360**
2. Activity type: ☐ Demolition ☒ Disposition *Through the NYC Public Housing Preservation Trust, NYCHA plans to comprehensively renovate Nostrand Houses to address the 20-year needs of the development, with rehabilitation work to start in 2026. The Trust will identify a Design-Build partner to complete the capital work and NYCHA will provide property management services to the development.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date original application approved, **submitted**, or planned for submission: **2026**
5. Number of units affected: 1,148
6. Coverage of action (select one) ☐ Part of the development ☒ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: **2023** b. Projected end date of activity: TBD

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

MANHATTAN

Demolition/Disposition Activity Description
1a. Development name: **Chelsea & Chelsea Addition** 1b. Development (project) number: NY005021340 & NY005011340
2. Activity type: ☒ Demolition ☒ Disposition *Potential demolition and/or disposition of 521 units across 3 buildings to facilitate redevelopment at the site.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date application approved, submitted, or **planned for submission**: RAD Conversion Commitment (RCC) approved by HUD for Phase I on January 30, 2026.
5. Number of units affected: 521 6. Coverage of action (select one) ☒ Part of the development ☒ Total development
7. Timeline for activity: a. Actual or projected start date of activity: **2025** b. Actual end date of activity: **TBD**

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

Demolition/Disposition Activity Description
1a. Development name: **Elliott** 1b. Development (project) number: **NY005011340**
2. Activity type: ☒ Demolition ☒ Disposition *Potential demolition and/or disposition of 590 units across 4 buildings to facilitate redevelopment at the site.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date application approved, submitted, or **planned for submission**: RAD Conversion Commitment (RCC) approved by HUD for Phase I on January 30, 2026.
5. Number of units affected: 590 6. Coverage of action (select one) ☒ Part of the development ☒ Total development • This is to be determined
7. Timeline for activity: a. Actual or projected start date of activity: **2020** b. Actual end date of activity: **TBD**

Demolition/Disposition Activity Description
1a. Development name: **Fulton** 1b. Development (project) number: **NY005001360**
2. Activity type: ☒ Demolition ☒ Disposition *Potential demolition and/or disposition of 944 units across 12 buildings to facilitate redevelopment at the site.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date application approved, submitted, or **planned for submission**: RAD Conversion Commitment (RCC) approved by HUD for Phase I on January 23, 2026.
5. Number of units affected: **944** 6. Coverage of action (select one) ☒ Part of the development ☒ Total development
7. Timeline for activity: a. Actual or projected start date of activity: **2025** b. Actual end date of activity: **TBD**

Disposition Activity Description
1a. Development name: **Harborview Terrace Houses** 1b. Development (project) number: **NY005010220**
2. Activity type: ☐ Demolition ☒ Disposition *Lease of a parcel of approximately 29,000 square feet on Block 1084, Lot 9 for development of affordable housing.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date application approved, submitted, or **planned for submission: TBD**
5. Number of units affected: 0 6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: **2017** b. **Projected** end date of activity: **TBD**

Disposition Activity Description
1a. Development name: **Holmes Towers** 1b. Development (project) number: **NY005011390**
2. Activity type: ☐ Demolition ☒ Disposition *Lease of an approximate 20,660 square foot parcel on Block 1573, Lot 20 with approximately 330,368 square feet of development rights for market rate and affordable housing development.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date original application approved, submitted, or **planned for submission**: **TBD**
5. Number of units affected: 0 6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: **2016** b. Projected end date of activity: **TBD**

Disposition Activity Description
1a. Development name: **La Guardia Houses** 1b. Development (project) number: **NY005010760**
2. Activity type: ☐ Demolition ☒ Disposition *Lease of approximately 18,000 square feet on a portion of Block 256, Lot 1, with approximately 340,000 square feet of residential development rights for market rate and affordable housing development.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date original application approved, submitted, or **planned for submission**: **TBD**
5. Number of units affected: 0 6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: **2017** b. Projected end date of activity: **TBD**

Disposition Activity Description
1a. Development name: **Lavanburg Homes** 1b. Development (project) number: **NY005003100**
2. Activity type: ☐ Demolition ☒ Disposition *NYCHA intends to dispose of the 104-unit residential building on Block 325, Lot 1 that was previously operated as a homeless shelter with a non-profit partner.*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ **Planned application**
4. Date original application approved, submitted, or **planned for submission: 2025**
5. Number of units affected: 252 units 6. Coverage of action (select one) ☐ Part of the development ☒ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: **2025** b. **Projected** end date of activity: **TBD**

Disposition Activity Description
1a. Development name: **Wagner Houses** 1b. Development (project) number: **NY005010740**
2. Activity type: ☐ Demolition ☒ Disposition *Disposition of a permanent subsurface easement located within Wagner Houses. The proposed disposition of the approximately 19,314 square feet permanent subsurface easement appurtenant to the development will facilitate the expansion of New York City's subway system.*
3. Application status (select one) ☒ Approved ☐ Submitted, pending approval ☐ Planned application
4. Date application **approved**, submitted, or planned for submission**: 2025**
5. Number of units affected: 0
6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: 2024 b. **Projected** end date of activity: **TDB**

QUEENS

Demolition/Disposition Activity Description
1a. Development name: **Ocean Bay Apartments (Oceanside)** 1b. Development (project) number: **NY005010980**
2. Activity type: ☐ Demolition ☒ Disposition *In 2003, as part of the Ocean Bay HOPE VI Plan, NYCHA acquired through eminent domain a blighted and underused shopping strip opposite Ocean Bay Apartments (Oceanside), consisting of seven contiguous parcels representing an area of approximately 37,111 SF.* *NYCHA needs to demolish the vacant one-story buildings as a result of unsafe conditions. NYCHA also intends to ground lease the parcels to a developer for the purpose of a mixed-use building featuring approximately 104 units of affordable housing and one superintendent unit, inclusive of eight (8) units available to households of Ocean Bay Apartments (Oceanside) through Transfer of Assistance. The property is located on Beach Channel Drive between Beach 53rd and Beach 54th Streets across the street south of Oceanside Apartments (Oceanside) and across the street east of Ocean Bay Apartments (Bayside).* *Borough Block Lot Address* *Queens 15890 54 360 Beach 54th Street (parcel contains a one-story retail space)* *Queens 15890 55 366 Beach 54th Street (parcel contains a one-story retail space)* *Queens 15890 58 53-15 Beach Channel Drive (vacant lot)* *Queens 15890 62 53-13 Beach Channel Drive (vacant lot)* *Queens 15890 64 53-05 Beach Channel Drive (parcel contains a one-story retail space)* *Queens 15890 66 53-01 Beach Channel Drive (parcel contains a one-story retail space)* *Queens 15890 69 N/A Beach 53rd Street (vacant lot)*
3. Application status (select one) ☐ Approved ☐ Submitted, pending approval ☒ Planned application
4. Date application approved, submitted, or **planned for submission**: **TBD**
5. Number of units affected: 0 6. Coverage of action (select one) ☒ Part of the development ☐ Total development
7. Timeline for activity: a. **Actual** or projected start date of activity: **2026** b. **Projected** end date of activity: **TBD**

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

[24 CFR Part 903.7 (j)]

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

1. Have any of the PHA's developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act?

☐ Yes ☒ No

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

In 1995, HUD approved the addition of the 21 developments to NYCHA's Annual Contribution Contract ("ACC") to allow NYCHA to expend public housing operating funds and capital funds for the ongoing expenses of these developments that were previously developed with funding from the City or the State of New York (the "City and State Developments"). The approval, however, did not include any additional funding from HUD specifically for these developments. Subsequently, on September 11, 2008, HUD approved NYCHA's voluntary conversion plan ("VCP") to transition up to 8,400 public housing units to tenant-based Section 8 assistance at the City and State Developments to close a significant gap between the cost of operating the buildings and rent collected. Under the VCP, NYCHA offered existing public housing residents the option to leave the public housing program and accept a Section 8 Housing Choice Voucher (HCV) with the option to remain in the same unit.

Most of the units in the City and State Developments did not become Section 8 units and continued to not be included in the federal operating and capital funding formula. To facilitate the rehabilitation of the City and State Developments and provide a basis for incorporating some of the units into the public housing funding formula, NYCHA proposed and received HUD approval in March of 2010 for two mixed-finance transactions: (i) one for a "non-tax credit" project containing 8 City and State Developments and known as the "LLC II Portfolio" and (ii) one for a low income housing tax credit project containing 13 City and State Developments and known as the "LLC I Portfolio".

The HUD approvals for the mixed-finance transactions also allowed the VCP to continue and to allow those units which converted to tenant-based Section 8 under the VCP to be project-based upon vacancy up to the original 8,400 unit limit. None of the public housing units in the LLC II Portfolio were added to the public housing funding formula and since 2010, all 8 City and State Developments in the LLC II Portfolio have all converted to project-based Section 8 under PACT. The majority (but not all) of the units in the LLC I Portfolio were added to the public housing funding formula and since 2010, 3 of the 13 City and State Developments in the LLC I Portfolio have converted to project-based Section 8 under PACT.

As of January 1, 2026, there are 2,056 Section 8 conversions in the remaining 10 City and State-Developments (see table below) in NYCHA's LLC I Portfolio. Subject to voucher and funding

availability, NYCHA will continue to designate units and implement the VCP at the City and State Developments in the LLC I Portfolio.

AMP Number	Development Name	Total Units	Number of Units to be Converted to Section 8	Number of Units Converted by 1 /1/26
NY005021870	AMSTERDAM ADDITION	175	26	26
NY005020860	BUSHWICK	1,220	209	209
NY005020800	CASTLE HILL	2,025	412	409
NY005021340	CHELSEA	425	68	68
NY005021110	DREW HAMILTON	1,217	276	278
NY005020490	MARBLE HILL	1,682	258	257
NY005020830	MARLBORO	1,765	372	365
NY005020990	RUTGERS	721	103	102
NY005020930	SAINT MARY'S PARK	1,007	211	209
NY005021140	STAPLETON	693	140	133
Total		**10,930**	**2,075**	**2,056**

C) Homeownership

[24 CFR Part 903.7 (k)]

1. Public Housing

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

☒ Yes ☐ No

Public Housing Homeownership Activity Description (Complete one for each development affected)
1a. Development name: **FHA Repossessed Houses** 1b. Development (project) number: **NY005012090**
2. Federal Program authority: ☐ HOPE I ☐ 5(h) ☐ Turnkey III ☒ Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) ☐ Approved; included in the PHA's Homeownership Plan/Program - *Section 5(h)* Submitted, pending approval ☒ Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: **TBD**
5. Number of units affected: TBD 6. Coverage of action: (select one) ☒ Part of the development ☐ Total development *NYCHA is currently working with existing residents in occupied FHA homes to plan for future opportunities, which might include the use of HUD's Section 32 program for households that are eligible for the program.*

D) Project-Based Vouchers ("PBV's")

Consistent with Section 232 of the *FY 2001 VA-HUD Appropriations Act* (PL 106-377), the *Notice* published in 66 Fed. Reg. 3605 (January 16, 2001), *HUD Notice PIH 2001-4 (HA)* dated January 19, 2001, and 24 C.F.R. §903 et seq., the New York City Housing Authority (hereafter "NYCHA" or "the Authority") makes the following statement:

1. As of March 1, 2026, NYCHA has executed 260 HAP contracts for 33,656 project-based units receiving subsidy across the five boroughs in New York City. This includes project-based apartments at NYCHA's LLC mixed finance developments and PACT conversions.
2. In 2026, NYCHA expects to utilize no more than 20% of the Consolidated Annual Contributions Contract (ACC) for Project Based contracts.[3]

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

3. NYCHA understands that all new project-based assistance agreements must be for units within census tracts with poverty rates of less than 20%, unless HUD specifically approves an exception. 66 Fed. Reg. 3608.
4. NYCHA intends to select one or more projects for project-based assistance without competition in accordance with § 983.51(c).

   Non-competitive PBV commitments in 2026 - 2027:

Development	Total PBV Units	Address
Grandparents Family Apartments	50	951 Prospect Ave, Bronx, NY 10459
Howard Avenue	8	575 Howard Avenue, Brooklyn, NY 11223
Weeksvillage (Kingsborough)	200	Address TBD, Brooklyn, NY 11233, in pre-development
Sol on Park (Morris II)	228	Address TBD, Bronx, NY 10456, in pre-development
Total	**486**	

5. NYCHA will carry out this program in accordance with 42 USC §1437f(o)(13), as amended by §232 of the *FY 2001 VA-HUD Appropriations Act and HUD Notice PIH 2017-21 (HA),* and in conformity with the non-discrimination requirements specified in 24 CFR §903.7(o). In carrying out this program, the Authority will act affirmatively to further fair housing.
6. The Section 8 Project-Based Program will be consistent with NYCHA's FY 2026 Annual Plan because:
   a. Project-basing in certain locations is needed to assure the availability of affordable housing units for an initial period of 20 years with a renewal option of up to 20 years (maximum 40 years combined).
   b. Project-basing broadens the scope of NYCHA's program for applicants and landlords. It allows NYCHA to assist families who would not otherwise be eligible for assistance.
   c. Consistent with the goals of NYCHA's Five-Year plan, the Section 8 Project-Based Initiative:
      i. expands the supply of assisted housing;
      ii. increases assisted housing choice;
      iii. ensures equal opportunity, and
      iv. deconcentrates poverty and expands economic opportunities.

7. NYCHA will create site-based waiting lists for developments selected to receive project-based assistance. Applicants on NYCHA's housing choice voucher waiting list will have the opportunity to apply for placement on site-based waiting lists. Placement on a site-based waiting list will not affect the applicant's standing on the tenant-based waiting list.

E) Conversion of Public Housing under the Rental Assistance Demonstration (RAD) Program

The Rental Assistance Demonstration (RAD) is a voluntary program administered by the United States Department of Housing and Urban Development (HUD). The goals of RAD are to safeguard long-term housing assistance, improve and modernize properties, and stabilize developments by placing them on more solid financial footing by converting the federal subsidy stream for such developments from Section 9 to Section 8. On June 19, 2019, HUD approved NYCHA's Significant Amendment to the FY 2019 Annual Plan, which included a request to use the Section 18 disposition process for some or all units within the developments currently approved or being considered for RAD conversion, in order to improve the financial stability of the conversions.

Through NYCHA's Permanent Affordability Commitment Together (PACT) initiative and the NYC Public Housing Preservation Trust (Trust), RAD, Section 18, and Part 200 programs are used to unlock funding to complete comprehensive repairs, while also ensuring homes remain permanently affordable and residents have the same basic rights as they possess in the public housing program. Residents continue to pay no more than 30% of adjusted gross income towards rent and developments remain under public control. NYCHA is also utilizing the Transfer of Assistance program to effectuate RAD conversions and expand housing opportunities for existing Public Housing residents.

1. Developments Previously Converted

Stabilized PACT sites (no longer under construction)

- **Ocean Bay (Bayside)** – substantial construction completion in 2019
- **Betances-** substantial construction completion in 2020
- **Brooklyn Bundle I &II** - substantial construction completion in 2022
- **Hope Gardens-** substantial construction completion in 2021
- **Twin Parks West**- construction completion in 2023
- **Highbridge- Franklin** – construction completion in 2023
- **Manhattan Bundle sites**- construction completion in 2023
- **Williamsburg Houses**- substantial construction completion in 2025
- **Linden-Penn Wortman** - substantial construction completion in 2025
- **Audubon, Bethune, and Marshall** - substantial construction completion in 2026
- **Union Avenue Consolidated** - substantial construction completion in 2025
- **Harlem River** - substantial construction completion in 2025
- **Boulevard-Belmont Sutter Area-Fiorentino Plaza** - substantial construction completion in 2026

2. Previously Converted Developments with Ongoing Construction and Repair Work

PACT at Edenwald

This conversion will provide $783 million for comprehensive repairs to 2,055 units across 40 buildings in the Bronx. The development team consists of Camber Property Group, Henge Development, SAA | EVI (co-developers), L&M Builders Group (general contractor), C+C Management (property manager), and Catholic Charities Community Service (social services provider). Repairs began in 2023 and are expected to be substantially completed in 2027.

PACT at Reid/Park Rock

The developments include 104-10 Tapscott Street, Crown Heights, Fenimore Lefferts, Howard Avenue, Howard Avenue-Park Place, Lenox Road Parkway, Ocean Hill Brownsville, Park Rock Rehab, Ralph Avenue Rehab, Reid Apartments, Rutland Towers, Sterling Place Rehab (Saint Johns Sterling), Sterling Place Rehab (Saint Johns Buffalo). This conversion will provide $635.6 million for comprehensive repairs to 1,696 units across 88 buildings in Brooklyn. The development team consists of the BRP, Fairstead, and Urbane. The team started construction on the comprehensive rehabilitation, has assumed day-to-day property management, and coordinates social services for all buildings in the Reid Park Rock bundle. Repairs began in 2023 and are expected to be substantially completed in 2027.

PACT at Sack Wern

This conversion will provide $189.9 million for comprehensive repairs to 483 units across buildings in the Bronx. The development team consists of Asland Capital Partners , Breaking Ground (non-profit), and Douglaston Development. General contractor Levine Builders will start construction on the comprehensive rehabilitation; Clinton Management has assumed day-to-day property management and will coordinate social services for all buildings with support from BronxWorks. Repairs began in 2024 and are expected to be substantially completed in 2027.

PACT at West Brighton I & II

This conversion will provide $283.3 million for comprehensive repairs to 586 units across buildings in the Bronx. The development team consists of BFC Partners, CB-Emmanuel Realty , and Catholic Homes NY (non-profit). General contractors BFC Partners and CB-Emmanual will start construction on the comprehensive rehabilitation; Pinnacle City Living has assumed day-to-day property management and will coordinate social services for all buildings with support from Housing Opportunities Unlimited. Repairs began in 2024 and are expected to be substantially completed in 2026.

PACT at Frederick Samuel Apartments

This conversion will provide $383.6 million for comprehensive repairs to 664 units across buildings in the Bronx. The development team consists of Genesis Companies and Lemor Development Group . General contractor Monadnock Construction will start construction on comprehensive rehabilitation; VPH Management has assumed day-to-day property management and will

coordinate social services for all buildings with support from existing on-site providers. Repairs began in 2024 and are expected to be substantially completed in 2027.

PACT at Boston Secor, Boston Road Plaza, Middletown Plaza

This conversion will provide $419 million for comprehensive repairs to 952 units across buildings in the Bronx. The development team consists of Beacon Communities, Kalel Companies and MBD Community Housing Corporation. General contractor Notias Construction will start construction on the comprehensive rehabilitation; Wavecrest Management has assumed day-to-day property management and will coordinate social services for all buildings with support from existing on-site providers, including R.A.I.N. Repairs began in 2024 and are expected to be substantially completed in 2026.

PACT at Manhattanville

This conversion will provide $445 million for comprehensive repairs to 1,272 units across buildings in Manhattan. The development team consists of Apex Building Group , Gilbane Development Company, and West Harlem Group Assistance (non-profit). General contractor Apex Building Group and Gilbane Development Company started construction on the comprehensive rehabilitation, and ELH Mgmt has assumed day-to-day property management. Social services for all buildings will be coordinated by Goddard Riverside. Repairs began in 2025 and are expected to be substantially completed in 2027.

PACT at Eastchester Gardens

This conversion will provide $390 million for comprehensive repairs to 877 units across buildings in the Bronx. The development team consists of Infinite Horizons , MDG Design + Construction, and Wavecrest Management Group. General contractor MDG Design + Construction started construction on the comprehensive rehabilitation, and Wavecrest Management Group has assumed day-to-day property management. Social services for all buildings will be coordinated by BronxWorks. Repairs began in 2025 and are expected to be substantially completed in 2028.

PACT at Northwest Bronx Scattered Sites

The developments include 1010 East 178th Street, East 180th Street-Monterey Avenue, Twin Parks East (Site 9), Bailey Avenue-West 193rd Street, Fort Independence Street-Heath Avenue, Harrison Avenue Rehab (Group A), Harrison Avenue Rehab (Group B), and University Avenue Rehab. This conversion will provide nearly $600 million for comprehensive repairs to 1,669 units across developments in the Northwest Bronx. The development team consists of The Arker Companies, Dabar Development Partners (MWBE), and SBV RE Investments LLC. General contractor Renewal Chateau JV started construction on the comprehensive rehabilitation and Progressive Management of NY has assumed day-to-day property management. Social services for all buildings will be coordinated by Progressive Management. Repairs began in 2025 and are expected to be substantially completed in 2027.

PACT at Metro North Plaza & White Houses

This conversion will provide $272 million for comprehensive repairs to 523 units across two developments in Manhattan. The development team consists of Ascendant Neighborhood Development Corp (non-profit), and The Community Builders (non-profit). General contractor MDG Design + Construction started construction on the comprehensive rehabilitation and Wavecrest Management Group of NY has assumed day-to-day property management. Social services for all buildings will be coordinated by The Community Builders (non-profit). Repairs began in 2025 and are expected to be substantially completed in 2028.

PACT at Ocean Hill & Stuyvesant Gardens

This conversion will provide $433 million for comprehensive repairs to 927 units across developments in East Brooklyn. The development team consists of Dantes Partners and Kalel Companies. General contractor ETC Companies started construction on the comprehensive rehabilitation and Wavecrest Management Group of NY has assumed day-to-day property management. Social services for all buildings will be coordinated by Bedford Stuyvesant Restoration Corporation (non-profit). Repairs began in 2025 and are expected to be substantially completed in 2028.

PACT at Jackie Robinson & Harlem Scattered Sites

This conversion will provide $453 million for comprehensive repairs to 1,058 units across developments in Harlem. The development team consists of Ascendant Neighborhood Development Corp., and the Community Builders. General contractor MDG Design + Construction started construction on the comprehensive rehabilitation and Wavecrest Management Group of NY has assumed day-to-day property management. Social services for all buildings will be coordinated by LSA Family Health Service and Asian Americans for Equality (non-profit partners). Repairs began in 2025 and are expected to be substantially completed in 2029.

PACT at Bay View

This conversion will provide $757 million for comprehensive repairs to 1,610 units across the development in Brooklyn. The development team consists of Infinite Horizon, MDG Design + Construction, and Wavecrest Management Group. General contractor MDG Design + Construction started construction on the comprehensive rehabilitation and Wavecrest Management Group of NY has assumed day-to-day property management. Social services for all buildings will be coordinated by IMPACCT Brooklyn (non-profit). Repairs began in 2025 and are expected to be substantially completed in 2029.

PACT at Campos Plaza II

This conversion will provide $92.5 million for comprehensive repairs to 224 units across the development in Manhattan. The development team consists of L+M Development Partners and Type A Projects. General contractor, L+M Builders Group, started construction on the comprehensive rehabilitation and C+C Apartment Management has assumed day-to-day property management. Social services for all buildings will be coordinated by Henry Street Settlement (non-profit). Repairs began in 2026 and are expected to be substantially completed in 2028.

PACT at Moore and East 152nd Street-Courtlandt Avenue

This conversion will provide $349 million for comprehensive repairs to 684 units across the development in the Bronx. The development team consists of Mega Group Development and Brisa Builders Development. General contractor, Mega Contracting Group, started construction on the comprehensive rehabilitation, and Cornell Pace has assumed day-to-day property management. Social services for all buildings will be coordinated by BronxWorks (non-profit). Repairs began in 2026 and are expected to be substantially completed in 2029.

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

Below, please find specific information related to the public housing developments that are under consideration by HUD for future Section 8 conversions, which may involve some or all units or land converting to Section 8 via RAD, Section 18, and/or Part 200, or the use of Transfer of Assistance. This section includes the developments that are under consideration for the PACT program, as well as the developments that will be converted through the Trust and have undergone resident votes (Nostrand, Bronx River Addition, Coney Island [Site 1B] / Unity Towers, and Hylan).

City-Wide
FHA Repossessed Houses (FHA Homes)

Name of Public Housing Development: FHA REPOSSESSED HOUSES	**PIC Development ID:** NY005012090	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 149	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 149 = $739,029
Bedroom Type	**Number of Units Pre-Conversion:** 149	**Number of Units Post-Conversion:** 149	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**10**	**10**	0
Two Bedroom	**52**	**52**	0
Three Bedroom	**62**	**62**	0
Four Bedroom	**22**	**22**	0
Five Bedroom	**3**	**3**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

BRONX

Name of Public Housing Development: 1162-1176 WASHINGTON AVENUE	**PIC Development ID:** NY005013080	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 66	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 66 = $327,355
Bedroom Type	**Number of Units Pre-Conversion** 66	**Number of Units Post-Conversion** 66	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**11**	**11**	0
One Bedroom	**17**	**17**	0
Two Bedroom	**10**	**10**	0
Three Bedroom	**17**	**17**	0
Four Bedroom	**11**	**11**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: BOYNTON AVENUE REHAB	**PIC Development ID:** NY005010320	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 82	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 82 = $406,714
Bedroom Type	**Number of Units Pre-Conversion** 82	**Number of Units Post-Conversion** 82	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**25**	**25**	0
Two Bedroom	**37**	**37**	0
Three Bedroom	**17**	**17**	0
Four Bedroom	**3**	**3**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: BRONX RIVER ADDITION	**PIC Development ID:** NY005010320	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 226	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 226 = $1,120,944
Bedroom Type	**Number of Units Pre-Conversion** 226	**Number of Units Post-Conversion** 226	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**151**	**151**	0
One Bedroom	**75**	**75**	0
Two Bedroom	**0**	**0**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: BRYANT AVENUE-EAST 174TH STREET	**PIC Development ID:** NY005015300	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 72	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 72 = $357,115
Bedroom Type	**Number of Units Pre-Conversion** 72	**Number of Units Post-Conversion** 72	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**14**	**14**	0
One Bedroom	**24**	**24**	0
Two Bedroom	**22**	**22**	0
Three Bedroom	**12**	**12**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: CLAREMONT REHAB (GROUP 4)	**PIC Development ID:** NY005013080	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 57 (2 Buildings – Buildings 5 & 6)	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 57 = $282,716
Bedroom Type	**Number of Units Pre-Conversion** 57	**Number of Units Post-Conversion** 57	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**20**	**20**	0
Two Bedroom	**24**	**24**	0
Three Bedroom	**12**	**12**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: CLAREMONT REHAB (GROUP 5)	**PIC Development ID:** NY005013080	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 135	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 135 = $669,590
Bedroom Type	**Number of Units Pre-Conversion** 135	**Number of Units Post-Conversion** 135	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**42**	**42**	0
Two Bedroom	**73**	**73**	0
Three Bedroom	**18**	**18**	0
Four Bedroom	**2**	**2**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: CLASON POINT GARDENS	**PIC Development ID:** NY005012800	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 401	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)**
			$724,303,359/146,031 x 401 = $1,988,931
Bedroom Type	**Number of Units Pre-Conversion:** 401	**Number of Units Post-Conversion:** 401	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**64**	**64**	0
Two Bedroom	**216**	**216**	0
Three Bedroom	**91**	**91**	0
Four Bedroom	**29**	**29**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**1**	**1**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: COLLEGE AVENUE-EAST 165TH STREET	**PIC Development ID:** NY005013080	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 95	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)**
			$724,303,359/146,031 x 95 = $471,193
Bedroom Type	**Number of Units Pre-Conversion:** 95	**Number of Units Post-Conversion:** 95	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**25**	**25**	0
One Bedroom	**70**	**70**	0
Two Bedroom	**0**	**0**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: EAST 165TH STREET-BRYANT AVENUE	**PIC Development ID:** NY005015300	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 111	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 111 = $550,552
Bedroom Type	**Number of Units Pre-Conversion** 111	**Number of Units Post-Conversion** 111	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**0**	**0**	0
Two Bedroom	**34**	**34**	0
Three Bedroom	**65**	**65**	0
Four Bedroom	**12**	**12**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: EAST 173RD STREET-VYSE AVENUE	**PIC Development ID:** NY005015300	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 168	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 168 = $833,268
Bedroom Type	**Number of Units Pre-Conversion** 168	**Number of Units Post-Conversion** 168	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**42**	**42**	0
Two Bedroom	**82**	**82**	0
Three Bedroom	**44**	**44**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: GLEBE AVENUE-WESTCHESTER AVENUE	**PIC Development ID:** NY005010670	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 132	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 132 = $654,711
Bedroom Type	**Number of Units Pre-Conversion:** 132	**Number of Units Post-Conversion:** 132	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**25**	**25**	0
One Bedroom	**107**	**107**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: HOE AVENUE-EAST 173RD STREET	**PIC Development ID:** NY005015300	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 65	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 65 = $322,395
Bedroom Type	**Number of Units Pre-Conversion** 65	**Number of Units Post-Conversion** 65	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**5**	**5**	0
One Bedroom	**24**	**24**	0
Two Bedroom	**24**	**24**	0
Three Bedroom	**12**	**12**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: HUNTS POINT AVENUE REHAB	**PIC Development ID:** NY005015300	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 131	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 131 = $649,751
Bedroom Type	**Number of Units Pre-Conversion** 131	**Number of Units Post-Conversion** 131	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**20**	**20**	0
Two Bedroom	**75**	**75**	0
Three Bedroom	**36**	**36**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: LONGFELLOW AVENUE REHAB	**PIC Development ID:** NY005015300	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 75	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 75 = $371,995
Bedroom Type	**Number of Units Pre-Conversion** 75	**Number of Units Post-Conversion** 75	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**0**	**0**	0
Two Bedroom	**0**	**0**	0
Three Bedroom	**75**	**75**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: MITCHEL	**PIC Development ID:** NY005011450	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)**: Yes, at 1678 Park Avenue, Manhattan. # of units TBD
Total Units: 1,732	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family (1 senior building)	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family (1 senior building)	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 1,732 = $8,590,597
Bedroom Type	**Number of Units Pre-Conversion:** 1,732	**Number of Units Post-Conversion:** 1,732	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**64**	**64**	0
One Bedroom	**664**	**664**	0
Two Bedroom	**541**	**541**	0
Three Bedroom	**389**	**389**	0
Four Bedroom	**59**	**59**	0
Five Bedroom	**15**	**15**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	NYCHA will create a new waitlist for Transfer of Assistance units at the new building.		

Name of Public Housing Development: MORRIS I	**PIC Development ID:** NY005011020	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)**: Yes, Morris II Campus, number of units TBD
Total Units: 1,085	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 1,085 = $5,381,523
Bedroom Type	**Number of Units Pre-Conversion:** 1,085	**Number of Units Post-Conversion:** 1,085	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**242**	**242**	0
Two Bedroom	**359**	**359**	0
Three Bedroom	**361**	**361**	0
Four Bedroom	**123**	**123**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	NYCHA will create a new, waitlist for Transfer of Assistance units at the new building.		

Name of Public Housing Development: MORRIS II	**PIC Development ID:** NY005011020	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** Yes, Morris II Campus, # of units TBD
Total Units: 1,808	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 1,808 = $8,967,551
Bedroom Type	**Number of Units Pre-Conversion:** 1,808	**Number of Units Post-Conversion:** 1,808	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**233**	**233**	0
Two Bedroom	**276**	**276**	0
Three Bedroom	**213**	**213**	0
Four Bedroom	**64**	**64**	0
Five Bedroom	**16**	**16**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	NYCHA will create a new waitlist for Transfer of Assistance units at the new building.		
Name of Public Housing Development: RANDALL AVENUE -BALCOM AVENUE	**PIC Development ID:** NY005010630	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 252	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 202 = $1,001,906
Bedroom Type	**Number of Units Pre-Conversion:** 252	**Number of Units Post-Conversion:** 252	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**56**	**56**	0
One Bedroom	**196**	**196**	0
Two Bedroom	**0**	**0**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: WEST FARMS ROAD REHAB	**PIC Development ID:** NY005015300	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 208	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 208 = $1,031,665
Bedroom Type	**Number of Units Pre-Conversion** 208	**Number of Units Post-Conversion** 208	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**92**	**92**	0
Two Bedroom	**81**	**81**	0
Three Bedroom	**31**	**31**	0
Four Bedroom	**4**	**4**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: WEST FARMS SQUARE CONVENTIONAL	**PIC Development ID:** NY005015310	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 20	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.)** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 20 = $99,199
Bedroom Type	**Number of Units Pre-Conversion** 20	**Number of Units Post-Conversion** 20	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**6**	**6**	0
Two Bedroom	**13**	**13**	0
Three Bedroom	**1**	**1**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: WEST TREMONT AVENUE-SEDGWICK AVENUE AREA	**PIC Development ID:** NY005010450	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 148	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 148 = $734,069
Bedroom Type	**Number of Units Pre-Conversion:** 146	**Number of Units Post-Conversion:** 146	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**32**	**32**	0
One Bedroom	**114**	**114**	0
Two Bedroom	**0**	**0**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

BROOKLYN

Name of Public Housing Development: ATLANTIC TERMINAL SITE 4B	**PIC Development ID:** NY005011630	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 300	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 300 = $1,487,979
Bedroom Type	**Number of Units Pre-Conversion:** 300	**Number of Units Post-Conversion:** 300	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**60**	**60**	0
One Bedroom	**91**	**91**	0
Two Bedroom	**80**	**80**	0
Three Bedroom	**45**	**45**	0
Four Bedroom	**15**	**15**	0
Five Bedroom	**9**	**9**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: BROWN	**PIC Development ID:** NY005012520	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 200	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 200 = $991,986
Bedroom Type	**Number of Units Pre-Conversion:** 200	**Number of Units Post-Conversion:** 200	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**200**	**200**	0
Two Bedroom	**0**	**0**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: CONEY ISLAND I (SITE 1B) (also known as Unity Towers)	**PIC Development ID:** NY005011660	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 193	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 193 = $957,266
Bedroom Type	**Number of Units Pre-Conversion:** 193	**Number of Units Post-Conversion:** 193	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**7**	**7**	0
One Bedroom	**28**	**28**	0
Two Bedroom	**70**	**70**	0
Three Bedroom	**58**	**58**	0
Four Bedroom	**20**	**20**	0
Five Bedroom	**10**	**10**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: EAST NEW YORK CITY LINE	**PIC Development ID:** NY005010700	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 66	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 66 = $327,355
Bedroom Type	**Number of Units Pre-Conversion:** 66	**Number of Units Post-Conversion:** 66	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**0**	**0**	0
Two Bedroom	**12**	**12**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**52**	**52**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**2**	**2**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: GARVEY (GROUP A)	**PIC Development ID:** NY005012520	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 321	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Partially Senior (1 Building)	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Partially Senior (1 Building)	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 321 = $1,592,137
Bedroom Type	**Number of Units Pre-Conversion:** 321	**Number of Units Post-Conversion:** 321	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**20**	**20**	0
One Bedroom	**66**	**66**	0
Two Bedroom	**108**	**108**	0
Three Bedroom	**72**	**72**	0
Four Bedroom	**43**	**43**	0
Five Bedroom	**12**	**12**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: HOWARD	**PIC Development ID:** NY005000720	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) Yes, Howard Campus, 8 units**
Total Units: 815	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 815 = $4,042,342
Bedroom Type	**Number of Units Pre-Conversion:** 815	**Number of Units Post-Conversion:** 815	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**55**	**55**	0
One Bedroom	**80**	**80**	0
Two Bedroom	**466**	**466**	0
Three Bedroom	**199**	**199**	0
Four Bedroom	**15**	**15**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	NYCHA will create a new waitlist for Transfer of Assistance units at the new building.		
Name of Public Housing Development: HYLAN	**PIC Development ID:** NY005010860	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)**
Total Units: 209	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 209 = $1,036,625
Studio/Efficiency	**2**	**2**	0
One Bedroom	**58**	**58**	0
Two Bedroom	**94**	**94**	0
Three Bedroom	**55**	**55**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: LONG ISLAND BAPTIST HOUSES	**PIC Development ID:** NY005012610	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)**
Total Units: 232	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 232 = $1,150,703
Bedroom Type	**Number of Units Pre-Conversion:** 232	**Number of Units Post-Conversion:** 232	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**57**	**57**	0
Two Bedroom	**125**	**125**	0
Three Bedroom	**31**	**31**	0
Four Bedroom	**19**	**19**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	Explain how transferring waiting list) N/A		
Name of Public Housing Development: KINGSBOROUGH	**PIC Development ID:** NY005010100	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)**: Yes, Kingsborough Campus, # of units TBD
Total Units: 1,165	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 815 = $5,778,317
Bedroom Type	**Number of Units Pre-Conversion:** 1,165	**Number of Units Post-Conversion:** 1,165	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**137**	**137**	0
One Bedroom	**397**	**397**	0
Two Bedroom	**455**	**455**	0
Three Bedroom	**174**	**174**	0
Four Bedroom	**1**	**1**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**1**	**1**	0
(If performing a Transfer of Assistance):	NYCHA will create a new waitlist for Transfer of Assistance units at the new building.		

Name of Public Housing Development: KINGSBOROUGH EXTENSION	**PIC Development ID:** NY005010100	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)**: Yes, Kingsborough Campus, # of units: TBD
Total Units: 187	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 187 = $927,507
Bedroom Type	**Number of Units Pre-Conversion:** 187	**Number of Units Post-Conversion:** 187	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**184**	**184**	0
Two Bedroom	**0**	**0**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	NYCHA will create a new waitlist for Transfer of Assistance units at the new building.		

Name of Public Housing Development: NOSTRAND	**PIC Development ID:** NY005010360	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 1,148	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $732,322,334/152,049 x 1,148 = $5,529,178
Bedroom Type	**Number of Units Pre-Conversion:** 1,148	**Number of Units Post-Conversion:** 1,148	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**287**	**287**	0
Two Bedroom	**766**	**766**	0
Three Bedroom	**95**	**95**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: RED HOOK WEST	**PIC Development ID:** NY005000790	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** Yes, # of units TBD
Total Units: 1,480	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 1,480 = $7,340,695
Bedroom Type	**Number of Units Pre-Conversion:** 1,480	**Number of Units Post-Conversion:** 1,480	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**96**	**96**	0
One Bedroom	**414**	**414**	0
Two Bedroom	**690**	**690**	0
Three Bedroom	**256**	**256**	0
Four Bedroom	**24**	**24**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: UNITY PLAZA (SITES 17,24,25A)	**PIC Development ID:** NY005012610	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)**
Total Units: 167	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 167 = $828,308
Bedroom Type	**Number of Units Pre-Conversion:** 167	**Number of Units Post-Conversion:** 167	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**14**	**14**	0
One Bedroom	**46**	**46**	0
Two Bedroom	**47**	**47**	0
Three Bedroom	**35**	**35**	0
Four Bedroom	**19**	**19**	0
Five Bedroom	**6**	**6**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: UNITY PLAZA (SITES 4-27)	**PIC Development ID:** NY005012610	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)**
Total Units: 462	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 462 = $2,291,487
Bedroom Type	**Number of Units Pre-Conversion:** 462	**Number of Units Post-Conversion:** 462	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**117**	**117**	0
Two Bedroom	**196**	**196**	0
Three Bedroom	**112**	**112**	0
Four Bedroom	**35**	**35**	0
Five Bedroom	**2**	**2**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

MANHATTAN

Name of Public Housing Development: 154 WEST 84TH STREET	**PIC Development ID:** NY005270	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 35	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 35 = $173,598
Bedroom Type	**Number of Units Pre-Conversion:** 35	**Number of Units Post-Conversion:** 35	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**4**	**4**	0
Two Bedroom	**27**	**27**	0
Three Bedroom	**4**	**4**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: CHELSEA	**PIC Development ID:** NY005021340	**Conversion type** (i.e., PBV or PBRA): PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 425	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)**
			$724,303,359/146,031 x 425 = $2,107,970
Bedroom Type	**Number of Units Pre-Conversion:** 425	**Number of Units Post-Conversion:** 425	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**23**	**23**	0
One Bedroom	**140**	**140**	0
Two Bedroom	**120**	**120**	0
Three Bedroom	**99**	**99**	0
Four Bedroom	**40**	**40**	0
Five Bedroom	**3**	**3**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: CHELSEA ADDITION	**PIC Development ID:** NY005011340	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) Yes, new replacement building, 36**
Total Units: 96	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)**
			$724,303,359/146,031 x 96 = $476,153
Bedroom Type	**Number of Units Pre-Conversion:** 96	**Number of Units Post-Conversion:** 96	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**96**	**96**	0
Two Bedroom	**0**	**0**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: DREW-HAMILTON	**PIC Development ID:** NY005021110	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)**: Yes, at 1678 Park Avenue, Manhattan. # of units TBD
Total Units: 1,217	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 1,217 = $6,036,233
Bedroom Type	**Number of Units Pre-Conversion:** 1,217	**Number of Units Post-Conversion:** 1,217	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**206**	**206**	0
One Bedroom	**322**	**322**	0
Two Bedroom	**200**	**200**	0
Three Bedroom	**369**	**369**	0
Four Bedroom	**102**	**102**	0
Five Bedroom	**18**	**18**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	NYCHA will create a new waitlist for Transfer of Assistance units at the new building.		

Name of Public Housing Development: ELLIOTT	**PIC Development ID:** NY005011340	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 608	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 608 = $3,015,637
Bedroom Type	**Number of Units Pre-Conversion:** 608	**Number of Units Post-Conversion:** 608	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**21**	**21**	0
One Bedroom	**47**	**47**	0
Two Bedroom	**357**	**357**	0
Three Bedroom	**163**	**163**	0
Four Bedroom	**19**	**19**	0
Five Bedroom	**1**	**1**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: FULTON	**PIC Development ID:** NY005001360	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 944	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 944 = $4,682,173
Bedroom Type	**Number of Units Pre-Conversion:** 944	**Number of Units Post-Conversion:** 944	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**72**	**72**	0
One Bedroom	**288**	**288**	0
Two Bedroom	**288**	**288**	0
Three Bedroom	**192**	**192**	0
Four Bedroom	**97**	**97**	0
Five Bedroom	**7**	**7**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: HERNANDEZ	**PIC Development ID:** NY005011000	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 149 (148 residential units)	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 149 = $739,029
Bedroom Type	**Number of Units Pre-Conversion:** 149	**Number of Units Post-Conversion:** 149	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**25**	**25**	0
One Bedroom	**48**	**48**	0
Two Bedroom	**53**	**53**	0
Three Bedroom	**17**	**17**	0
Four Bedroom	**6**	**6**	0
Five Bedroom	0	0	0
Six Bedroom	0	0	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: LINCOLN	**PIC Development ID:** NY005000200	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)**: Yes, at 1678 Park Avenue, Manhattan. # of units TBD
Total Units: 1,286	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 1,286 = $6,378,468
Bedroom Type	**Number of Units Pre-Conversion:** 1,286	**Number of Units Post-Conversion:** 1,286	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**60**	**60**	0
Two Bedroom	**826**	**826**	0
Three Bedroom	**397**	**397**	0
Four Bedroom	**3**	**3**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	NYCHA will create a new waitlist for Transfer of Assistance units at the new building.		

Name of Public Housing Development: MELTZER TOWER	**PIC Development ID:** NY005011000	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 231 (228 residential units)	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 231 = $1,145,744
Bedroom Type	**Number of Units Pre-Conversion:** 231	**Number of Units Post-Conversion:** 231	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**115**	**115**	0
One Bedroom	**116**	**116**	0
Two Bedroom	**0**	**0**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: Randolph South	**PIC Development ID:** NY005026001	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 168	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 168 = $833,268
Bedroom Type	**Number of Units Pre-Conversion: 168**	**Number of Units Post-Conversion: 168**	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**11**	**11**	0
One Bedroom	**83**	**83**	0
Two Bedroom	**41**	**41**	0
Three Bedroom	**19**	**19**	0
Four Bedroom	**14**	**14**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: RANGEL	**PIC Development ID:** NY005000370	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 984	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 984 = $4,880,570
Bedroom Type	**Number of Units Pre-Conversion:** 982	**Number of Units Post-Conversion:** 982	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**93**	**93**	0
Two Bedroom	**699**	**699**	0
Three Bedroom	**190**	**190**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: REHAB PROGRAM (DOUGLASS REHABS)	**PIC Development ID:** NY005013170	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 112	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 112 = $555,512
Bedroom Type	**Number of Units Pre-Conversion:** 112	**Number of Units Post-Conversion:** 112	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**13**	**13**	0
One Bedroom	**65**	**65**	0
Two Bedroom	**34**	**34**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: REHAB PROGRAM (WISE REHAB)	**PIC Development ID:** NY005011270	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 40	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 40 = $198,397
Bedroom Type	**Number of Units Pre-Conversion:** 40	**Number of Units Post-Conversion:** 40	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**21**	**21**	0
Two Bedroom	**19**	**19**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: ROBBINS PLAZA	**PIC Development ID:** NY005011390	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 150	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 150 = $743,989
Bedroom Type	**Number of Units Pre-Conversion:** 150	**Number of Units Post-Conversion:** 150	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**75**	**75**	0
One Bedroom	**55**	**55**	0
Two Bedroom	**20**	**20**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: SEWARD PARK EXTENSION	**PIC Development ID:** NY005011000	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 360 (360 residential units)	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 360 = $1,785,574
Bedroom Type	**Number of Units Pre-Conversion:** 360	**Number of Units Post-Conversion:** 360	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**29**	**29**	0
One Bedroom	**112**	**112**	0
Two Bedroom	**130**	**130**	0
Three Bedroom	**45**	**45**	0
Four Bedroom	**36**	**36**	0
Five Bedroom	**8**	**8**	0
Six Bedroom	0	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: THOMAS APARTMENTS	**PIC Development ID:** NY005011270	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 87	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 87 = $431,514

Bedroom Type	**Number of Units Pre-Conversion:** 87	**Number of Units Post-Conversion:** 87	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**87**	**87**	0
Two Bedroom	**0**	**0**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: WILSON	**PIC Development ID:** NY005010090	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 398	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 398 = $1,974,052

Bedroom Type	**Number of Units Pre-Conversion:** 398	**Number of Units Post-Conversion:** 398	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**0**	**0**	0
Two Bedroom	**38**	**38**	0
Three Bedroom	**304**	**304**	0
Four Bedroom	**38**	**38**	0
Five Bedroom	**18**	**18**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: WSUR (BROWNSTONES)	**PIC Development ID:** NY005011270	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 236	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 236 = $1,170,543
Bedroom Type	**Number of Units Pre-Conversion:** 236	**Number of Units Post-Conversion:** 236	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**124**	**124**	0
One Bedroom	**31**	**31**	0
Two Bedroom	**80**	**80**	0
Three Bedroom	**1**	**1**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: WSUR (SITE A) 120 WEST 94TH STREET	**PIC Development ID:** NY005011270	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 70	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 70 = $347,195
Bedroom Type	**Number of Units Pre-Conversion:** 70	**Number of Units Post-Conversion:** 70	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**5**	**5**	0
One Bedroom	**20**	**20**	0
Two Bedroom	**27**	**27**	0
Three Bedroom	**14**	**14**	0
Four Bedroom	**4**	**4**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: WSUR (SITE B) 74 WEST 92ND STREET	**PIC Development ID:** NY005011270	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 168	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 168 = $833,268
Bedroom Type	**Number of Units Pre-Conversion:** 168	**Number of Units Post-Conversion:** 168	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**69**	**69**	0
Two Bedroom	**57**	**57**	0
Three Bedroom	**36**	**36**	0
Four Bedroom	**6**	**6**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
Name of Public Housing Development: WSUR (SITE C) 589 AMSTERDAM AVENUE	**PIC Development ID:** NY005011270	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 158	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 158 = $783,669
Bedroom Type	**Number of Units Pre-Conversion:** 158	**Number of Units Post-Conversion:** 158	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**60**	**60**	0
Two Bedroom	**64**	**64**	0
Three Bedroom	**31**	**31**	0
Four Bedroom	**1**	**1**	0
Five Bedroom	**2**	**2**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

QUEENS

Name of Public Housing Development: BAISLEY PARK	**PIC Development ID:** NY005010910	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 386	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 386 = $1,914,533
Bedroom Type	**Number of Units Pre-Conversion:** 386	**Number of Units Post-Conversion:** 386	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**81**	**81**	0
Two Bedroom	**184**	**184**	0
Three Bedroom	**101**	**101**	0
Four Bedroom	**15**	**15**	0
Five Bedroom	**5**	**5**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: CONLON LIHFE TOWER	**PIC Development ID:** NY005010910	**Conversion type** (i.e., PBV or PBRA): PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 216	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 216 = $1,071,345
Bedroom Type	**Number of Units Pre-Conversion:** 216	**Number of Units Post-Conversion:** 216	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**51**	**51**	0
One Bedroom	**162**	**162**	0
Two Bedroom	**3**	**3**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: INTERNATIONAL TOWER	**PIC Development ID:** NY005010910	**Conversion type** (i.e., PBV or PBRA): PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 159	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 159 = $788,629
Bedroom Type	**Number of Units Pre-Conversion:** 159	**Number of Units Post-Conversion:** 159	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**0**	**0**	0
One Bedroom	**147**	**147**	0
Two Bedroom	**12**	**12**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: SHELTON HOUSE	**PIC Development ID:** NY005010910	**Conversion type** (i.e., PBV or PBRA): PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 155	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 155 = $768,789
Bedroom Type	**Number of Units Pre-Conversion:** 155	**Number of Units Post-Conversion:** 155	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**60**	**60**	0
One Bedroom	**95**	**95**	0
Two Bedroom	**0**	**0**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

STATEN ISLAND

Name of Public Housing Development: NEW LANE AREA	**PIC Development ID:** NY005010350	**Conversion type (i.e., PBV or PBRA):** PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 277	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Senior	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Senior	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 277 = $1,373,900
Bedroom Type	**Number of Units Pre-Conversion:** 277	**Number of Units Post-Conversion:** 277	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**1**	**1**	0
One Bedroom	**246**	**246**	0
Two Bedroom	**30**	**30**	0
Three Bedroom	**0**	**0**	0
Four Bedroom	**0**	**0**	0
Five Bedroom	**0**	**0**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

Name of Public Housing Development: STAPLETON	**PIC Development ID:** NY005021140	**Conversion type** (i.e., PBV or PBRA): PBV	**Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)** No
Total Units: 693	**Pre- RAD Unit Type (i.e., Family, Senior, etc.):** Family	**Post-RAD Unit Type if different (i.e., Family, Senior, etc.):** Family	**Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)** $724,303,359/146,031 x 693 = $3,437,231
Bedroom Type	**Number of Units Pre-Conversion:** 693	**Number of Units Post-Conversion:** 693	**Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)**
Studio/Efficiency	**24**	**24**	0
One Bedroom	**119**	**119**	0
Two Bedroom	**239**	**239**	0
Three Bedroom	**239**	**239**	0
Four Bedroom	**48**	**48**	0
Five Bedroom	**24**	**24**	0
Six Bedroom	**0**	**0**	0
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		

RAD Resident Rights, Participation, Waiting List and Grievance Procedures

Please note the resident rights listed below are from HUD Notice H-2019-09 PIH-2019-23 (HA), (September 5, 2019) Rental Assistance Demonstration REV-4 – Final Implementation, As amended by HUD Notice H-2023-08 PIH-2023-19 (HA) (July 27, 2023) ("RAD Supplemental Notice 4B"), as amended by HUD Notice H 2025-01 PIH 2025-03 (HA) (January 16, 2025) ("RAD Supplemental Notice 4C"), and as may be further amended from time to time, Section 1.6 C and Section 1.6 D) (as may be amended, the "Notice").

1.6.C. PBV Resident Rights and Participation.

1. **No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute[4], at conversion, current households cannot be excluded from occupancy at the Covered Project[5] based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project[6] will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.[7] 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 public housing program participant that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, Section 8(o)(4) of the Act[8] and 24 CFR § 982.201, 24 CFR § 983.251(a)(2) and 24 CFR § 983.255(a)(1), 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

[4] RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Pub. L. No. 112-55, approved November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Pub. L. No. 113-76, approved January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Pub. L. No. 113-235, approved December 16, 2014), the Consolidated Appropriations Act, 2016 (Pub. L. No. 114-113, approved December 18, 2015), the Consolidated Appropriations Act, 2017 (Pub. L. No 115-31, approved May 5, 2017), section 237 of Title II, Division L, Transportation, Housing and Urban Development, and Related Agencies, of the Consolidated Appropriations Act, 2018 (Pub. L. 115-141, approved March 23, 2018), as amended by the Consolidated Appropriations Act, 2022 (Pub. L. No. 117-103, approved March 15, 2022), and as amended by the Consolidated Appropriations Act, 2024; Division F—Transportation, Housing and Urban Development, and Related Agencies Appropriations Act, 2024, Title II Department of Housing and Urban Development § 221, Pub. L. No. 118-42 (March 9, 2024), collectively, the "RAD Statute."

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

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

[7] 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.

[8] The U.S. Housing Act of 1937 as may be amended.

Project that will reside in Legacy Non-RAD PBV[9] 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 Legacy 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 (a) and (b) of the Notice as set forth below and the RAD Fair Housing, Civil Rights, and Relocation Notice (as defined below) regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any Legacy Non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

   Section 1.4.A.5(a) of the Notice. Section 1.4.A.5(a) of the Notice states

   - **RAD Fair Housing, Civil Rights, and Relocation Notice.** The "Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements Applicable to RAD First Component – Public Housing Conversions," Notice H 2016-17 (HA), PIH 2016-17 (HA), as may be amended. Relocation requirements related to public housing conversions under RAD are described in the RAD Fair Housing, Civil Rights, and Relocation Notice.[10] The RAD Fair Housing, Civil Rights, and Relocation Notice provides PHAs and their development partners with information and resources on RAD program requirements, Uniform Relocation Act (URA) requirements, and other requirements which may be applicable such as Section 104(d) of the Housing and Community Development Act of 1974, as amended (Section 104(d)) when planning for or implementing resident moves in connection with a RAD conversion under the First Component of RAD. Specifically, the RAD Fair Housing, Civil Rights, and Relocation Notice provides guidance on relocation planning, resident right to return, relocation assistance, resident notification, initiation of relocation, and the fair housing and civil rights requirements applicable to these activities.

     The appendices to the RAD Fair Housing, Civil Rights, and Relocation Notice include recommended relocation plan contents. Sample relocation notices for issuance to residents depending on RAD project characteristics are available on the RAD website at www.hud.gov/rad. The primary source for First Component relocation requirements and guidance is the RAD Fair Housing, Civil Rights, and Relocation Notice and not the Notice. In the event of a conflict between the Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice, with regard to relocation requirements, the RAD Fair Housing, Civil Rights, and Relocation Notice controls.

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[9] *Legacy Non-RAD PBV is* PBV assistance in a Covered Project that prior to December 31, 2024 replaced public housing at the time of conversion and that are subject to a non-RAD PBV HAP Contract.

[10] Please see Attachment R beginning on page 251 for the full text of the "Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions" Notice H 2016-17; PIH 2016-17 (HA), as may be amended from time to time at https://www.hud.gov/sites/documents/16-17HSGN_16-17PIHN.PDF.

- **Section 1.4.A.5(b) of the Notice.** Section 1.4.A.5(b) of the Notice states:

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

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[11]) 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[12] must follow according to the phase-in period established. For purposes of this section "Calculated PBV TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1 (the first recertification following conversion), as illustrated below.

Three-Year Phase-in:

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[11] *TTP* means the total tenant payment as calculated pursuant to 24 CFR Part 5.

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

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full Calculated PBV TTP [13]

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). PHAs and Project Owners must follow the FSS regulations at 24 CFR part 984.** Public Housing residents that are currently FSS participants will continue to participate in the PHA's FSS program for the duration of the grant's period of performance. 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 and any applicable 24 CFR part 200 requirements. If the PHA continues to run an FSS program that serves public housing, HCV (including PBV), and /or PBRA participants, the PHA will continue to be eligible (subject to FSS Funding Notice requirements) to apply for FSS funding. Due to the program merger between public housing FSS and HCV FSS that took

[13] 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.

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

5. **Resident Participation and Funding.** In accordance with Attachment 1B of the Notice, residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding. To facilitate the uniform treatment of residents and units at a Covered Project, any Legacy 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 Legacy Non-RAD PBV 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:

         i. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
         ii. In the event of any drug-related or violent criminal activity or any felony conviction;

      ii. Not less than 30 days in the case of nonpayment of rent and in conformance with the terms of the Tenancy Addendum (HUD Form 52530c or replacement form); 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), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
   i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
   ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.
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.

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

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

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

Covered Project, any Legacy 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 FY2014 and/or subsequent fiscal year 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 grant agreement and/or work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project (see provisions in the relevant Jobs Plus NOFO and/or Grant Agreement). If the Jobs Plus program is continued, the grantee must agree to continue to implement the program according to HUD's program requirements. During the term of the Jobs Plus grant period after conversion, residents previously enrolled in the Jobs Plus rent incentive may continue their enrollment and any project resident may enroll in services or the rent incentive after conversion. To facilitate the uniform treatment of residents and units, any Jobs Plus program at a target project(s) may also enroll residents in any Legacy Non-RAD PBV units in a Covered Project that replaced former public housing at the time of conversion in Jobs Plus services and in the Jobs Plus financial/rent incentive. To facilitate the ongoing availability of services for resident participants of Jobs Plus, HUD is waiving and establishing an alternative requirement to the "Self Sufficiency Programs" account in the Consolidated Appropriations Act, 2024 (and subsequent Appropriations Acts, as applicable) that restricts Jobs Plus grants to serving only public housing residents.

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 §§ 983.52(c) and 983.251(a)(2)). Also, a PHA must remove a unit from the HAP 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 Gross Rent. (24 CFR § 983.258 and § 983.211).

Pre-Conversion Residents. Since the rent limitation under this Section of the Notice may result in current residents having TTPs that exceed the Gross Rent, 24 CFR §§ 983.52(c)) and 983.251(a)(2) does not apply in order to provide RAD PBV assistance to residents who were living in the Converting Project prior to conversion. As necessary to further implement the alternative requirements described below, HUD is waiving 24 CFR § 983.258 and §983.211, as well as the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 and 24 CFR § 983.353(b)(1) as modified by Section 1.6.B.5 of this Notice.

HUD is establishing an alternative requirement that the unit for a family with a TTP that equals or exceeds Gross Rent must be placed on the PBV HAP Contract and the family shall be admitted to the PBV program. In such cases the resident is considered a participant under the PBV program and all the family obligations and protections under RAD and PBV apply to the resident.

During any period when the family's TTP is equal to or above the Gross Rent, the zero- HAP family will pay an alternate rent to owner that is the lower of:

a. the family's TTP less the Utility Allowance[14], subject to any required phase-in pursuant to Section 1.6.C.3 of the Notice; or
b. the Zero-HAP Rent Cap, which is the lower of either:
    i. 110% of the applicable FMR less the Utility Allowance; or
    ii. In the event the units are subject to more restrictive rent setting requirements under the LIHTC or HOME programs, or other programs approved by HUD on a project-specific basis, the rent to owner set to comply with such requirements.

During any period that the family's TTP falls below the Gross Rent, the normal PBV requirements apply and the family would pay 30% of adjusted income, less utility allowance.

After a family has paid the Zero-HAP Rent Cap as set by this Section for a period of 180 days, the PHA shall remove the unit from the HAP Contract and the family's participation in the PBV program ends.[15] If the Covered Project is fully assisted and the family subsequently leaves the property, the PHA must reinstate the unit back onto the HAP Contract and admit an eligible family. If the Covered Project is partially assisted and the family subsequently leaves the property, the unit must be reinstated back onto the HAP Contract unless the PHA previously substituted a different 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. Additionally, if the family continues to reside in the project after the family's unit was removed from the HAP Contract, the family may request to return to the PBV program if the family's income subsequently decreases to the extent that the family's TTP is less than the Zero-HAP Rent Cap set by this section and the family is otherwise eligible for PBV

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[14] *Utility Allowance*: As defined in 24 CFR Part 5, the amount that a Public Housing Authority or Project Owner determines is reasonable for tenant-paid utility costs. In the case where the Utility Allowance exceeds the Total Tenant Payment (as defined at 24 CFR § 5.613), the tenant is reimbursed in the amount of such excess.

[15] 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 (Gross Rent = $550). The FMR for the unit size in the area in which the project is located is $800. Following conversion, the family is responsible for paying $550 in tenant rent. If the resident's income rises or is subject to a rent increase phase-in and all other conditions remain the same, the family would pay TTP until the tenant rent reached the Zero-HAP Rent Cap of $830 ($880, which is 110% of the $800 FMR, minus the $50 utility allowance), at which point the family would continue paying $830, and unless the family's income and TTP subsequently decreases, the unit would be removed from the contract after 180 days. Families paying less than TTP because of the phased in Tenant Rent Increase alternative requirement are not paying the Zero-HAP Rent Cap and are not subject to this 180-day requirement. However, if the family's Calculated PBV TTP under section 1.6.C.3 is more than the Gross Rent, the family is a zero-HAP family and the applicability of the phased in Tenant Rent increase would end when the amount the family would pay under that alternative requirement meets or exceeds the Zero-HAP Rent Cap. At that point in time the family would pay the Zero-HAP Rent Cap and would be subject to all zero-HAP family requirements of this section, including the 180-day requirement.

assistance. The PHA shall, at the earliest opportunity[16], reinstate the family's unit back onto the HAP Contract to provide rental assistance to the family. All PBV requirements with respect to the unit, such as compliance with HQS, apply while the unit is under the HAP Contract or added back to the HAP Contract.

New Admission Families. Unless a PHA requests and receives the waiver described below, any new admission to the Covered Project must meet the eligibility requirements at 24 CFR § 982.201 and require a subsidy payment at admission to the PBV program, which means the family's TTP may not equal or exceed the Gross Rent for the unit at that time. Furthermore, a PHA must remove a new admission family's unit from the PBV HAP Contract when no assistance has been paid for 180 days because a new admission family's TTP subsequently increased to equal or exceed the Gross Rent. However, HUD is imposing an alternative requirement in such cases. If the project is fully assisted and the family subsequently leaves the property, the PHA must reinstate the unit on the HAP Contract and admit an eligible family. 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.

In circumstances where low RAD PBV rents may prohibit a significant number of otherwise eligible families on the waiting list from being admitted to the project because they do not require subsidy, and which could consequently create an undue concentration of poverty at the project compared to non-RAD PBV projects, a PHA may request a waiver of 24 CFR §§983.53(c), 983.258, 983.211, and 983.301 from HUD for the Covered Project. The waiver will apply the alternative requirements applicable to the pre-conversion residents in this Section to new admission families.

The PHA may request the waiver during the RAD conversion process or may subsequently request the waiver any time after the effective date of the HAP Contract. In order for the waiver to be approved, the PHA must demonstrate that based on the RAD rent calculated in accordance with Attachment 1C, the monthly two-bedroom RAD Gross Rent is less than: 30% of the monthly income of a family of four at the midpoint between the Very Low Income (VLI) HUD Income Limit and Extremely Low Income (ELI) HUD Income Limit for the area in which the Covered Project is located.

For waivers submitted during the conversion process, the Office of Recapitalization may grant the waiver after review of the Financing Plan and confirmation that the RAD rents

[16] If the project was partially assisted and the PHA previously substituted a different unit on the HAP Contract, the PHA shall substitute the family's unit for a vacant unit on the HAP Contract if there is a vacant unit at the time of the request, or by doing so as soon as a unit on the HAP Contract becomes vacant if there are no vacant units on the HAP Contract at the time of the family request.

meet the waiver rent threshold described above.[17] The Office of Recapitalization shall document the waiver by adding an additional provision to the RCC (RAD Conversion Commitment)[18] before closing. For waivers submitted after the effective date of the HAP Contract, the waiver is submitted through the normal waiver process outlined in Notice PIH 2018-16 (or any successor notice). In both cases, the approved waiver will be for the initial term of the PBV HAP Contract.

If the waiver is approved, the new admission families covered under the waiver are participants under the PBV program, all the family obligations and protections under RAD and PBV apply to the family, the RAD PBV families shall be subject to the same alternative requirements applicable to the pre-conversion residents under this Section, and the unit is subject to all PBV program requirements, as modified by this Notice.

Further, Covered Projects that receive the waiver shall be subject to an alternative income targeting requirement that at least 75% of new admissions to the PBV units (both RAD and non-RAD PBV units) in the Covered Project in any PHA fiscal year are ELI families.[19] If there are less than four new admissions to the Covered Project in a PHA fiscal year, the income targeting is determined by combining the new admissions for that fiscal year with the new admissions for the subsequent fiscal year (or years) until the combined total of new admissions equals or exceeds four for those consecutive fiscal years.[20]

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

[17] An example of the waiver rent threshold calculation is as follows. Assume the applicable VLI limit is $46,850 and the ELI limit is $28,100. The midpoint income is $37,475 ($46,850 + $28,100 = $74,950;$74,950/2 = $37,475). To calculate the affordable monthly rent, the midpoint income is divided by 12 and multiplied by 0.30 ($37,475/12 = $3,123; $3,123*0.30 = $937). If the RAD Rent is less than $937, the Covered Project is eligible for the waiver.

[18] RAD Conversion Commitment. For the First Component, the contract executed by HUD, the PHA and, as applicable, the pre-conversion owner (if not the PHA), and the post-conversion Project Owner. The RCC follows completion of HUD's review of the Financing Plan and describes the terms and conditions under which HUD will approve the proposed conversion and execute closing documents.

[19] This alternative requirement for the Covered Project is in addition to the PHA's HCV/PBV program income targeting requirements at 24 CFR 982.201(b)(2). Admissions to the Covered Project continue to be taken into account when determining income targeting in accordance with 24 CFR 982.201(b)(2).

[20] For example, assume in fiscal year in which the waiver was granted the Covered Project had one new admission and in following fiscal year had three new admissions. Compliance with the Covered Project income targeting requirement would be determined based on the combined total of the 4 new admissions over the two fiscal years (3 of the 4 new admissions to PBV units the Covered Project must have been ELI families).

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

1.6.D. PBV: Other Miscellaneous Provisions

1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration. PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV of the Notice for reporting units in Form HUD-50058.

2. Review of Financial Documents. The Project Owner must submit to the administering PHA's Board the operating budget for the Covered Project annually. When timely requested by the Contract Administrator, the Project Owner must also submit property-specific audited year-end financial statements within a reasonable time established by the Contract Administrator. The Contract Administrator must confirm that the Project Owner is making deposits into the Reserve for Replacement account in accordance with the RCC as well as assess the financial health of the Covered Project**.**[21]

3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). These sections have been moved to 1.4.A.14 and 1.4.A.15 of the Notice.

> 14. Davis-Bacon prevailing wages. The Davis-Bacon prevailing wage requirements (prevailing wages, the Contract Work Hours and Safety Standards Act, and implementing regulations, rules, and requirements) apply to all Work, including any new construction, that is identified in the Financing Plan and RCC to the extent that such Work qualifies as development. "Development," as applied to work subject to Davis-Bacon requirements on Section 8 projects, encompasses work that constitutes remodeling that alters the nature or type of housing units in a PBV or PBRA project, reconstruction, or a substantial improvement in the quality or kind of original equipment and materials, and is initiated within 18 months following the effective date of the HAP Contract. Development activity does not include replacement of equipment and materials rendered unsatisfactory because of normal wear and tear by items of substantially the same kind. Davis-Bacon requirements apply only to projects with nine or more assisted units.

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

15. Section 3 of the Housing and Urban Development Act of 1968 (Section 3). Section 3 is codified at 12 U.S.C. 1701u and implemented by regulation at 24 CFR part 135 or successor part.

a. Pursuant to such requirements, all pre-development conversion costs funded by public housing program funds pursuant to Section 1.5.A are subject to 12 U.S.C. 1701u(c)(1) and (d)(1), which sets forth Section 3 requirements applicable to public housing activities.

b. While most RAD conversions do not utilize funding covered by Section 3, HUD has established the alternative requirement that any Work required by the conversion after the RAD Closing that involves housing rehabilitation or housing construction is subject to the Section 3 requirements applicable to housing and community development activities as set forth in 12 U.S.C. 1701u(c)(2) and (d)(2) and the regulations derived from such provisions, except that, with the exception of transactions receiving HUD housing and community development assistance, such as CDBG (24 CFR part 570) or HOME (24 CFR part 92), first priority for employment and other economic opportunities shall be given to residents of public housing or Section 8 not, in itself, trigger the applicability of Section 3.

c. The Project Owner shall report Section 3 compliance through the post-closing completion certification to HUD described in Section 1.13.B.7 of this Notice upon completion of the Work. In addition, for any housing rehabilitation or housing construction assisted with HUD housing and community development assistance, such as CDBG (24 CFR part 570) or HOME (24 CFR part 92), Section 3 compliance shall be reported consistent with such program requirements.

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).[22]

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)(iii). 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 Legacy 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.

5. Mandatory Insurance Coverage. The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent

[22] 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

insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.

6. Future Refinancing. Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC but HUD review of liens must be performed prior to execution.

7. Administrative Fees for Public Housing Conversions During the Year of Conversion. For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the "year of conversion"), RAD PBV projects will be funded with public housing funds. For example, if the project's assistance converts effective July 1, 2015, the public housing ACC between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV HAP Contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive Section 8 administrative fee funding for converted units during this time.

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

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

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 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.

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

10. Initial Certifications and Tenant Rent Calculations. The Contract Administrator uses the family's public housing tenant rent (reflected on line 10f of the family's most recent HUD Form 50058) at the date of the conversion to calculate the PBV HAP and tenant rent until the effective date of the earlier of the family's first regular or interim recertification following the date of conversion. At the earlier of the family's first regular or interim recertification, the Contract Administrator will use the family's TTP based on the recertification and the HCV utility allowance (or the PBV site specific utility allowance, if applicable) to determine the PBV HAP and tenant rent.

This means that the family pays the same tenant rent as the family was paying under the public housing program until the earlier of first regular or interim reexamination following conversion, at which point the normally applicable PBV calculation for the tenant rent becomes effective. (Under the PBV program, the monthly HAP is the rent to owner minus the tenant rent, and the tenant rent is the family TTP minus the utility allowance.) To facilitate the uniform treatment of residents and units at a Covered Project, any Legacy Non-RAD PBV units located in the same property as the Covered Project shall be subject to the terms of this provision. To effectuate this provision, HUD is waiving 24 CFR 5.601 and 24 CFR § 983.2(c)(7)(iii) and 24 CFR § 983.301(f)(4).

I –Move Plans

If a resident must be temporarily moved due to personal medical reasons, health and safety reasons (for example, due to necessary environmental abatement), and/or reasonable accommodation, the temporary move will be performed at no expense to the resident and the resident will have the right to return after the rehabilitation to their original unit. The resident will be offered a temporary unit at a development within the same PACT project. In limited instances, an off-site relocation may be necessary. Specific temporary move plans will be finalized after a PACT partner is selected for each affected development.

If a resident must be moved due to the demolition of their current building, the move will be performed at no expense to the resident and the resident will have the right to return after the rebuilding of the building is complete. Specific move plans for any household impacted by the

demolition of the household's building and development will be developed by the PACT partner **in compliance with the RAD Fair Housing, Civil Rights, and Relocation Notice**.

NYCHA will submit the RAD Fair Housing, Civil Rights, and Relocation Checklist to HUD as required by the Notice and will comply with the fair housing, civil rights and relocation requirements under the RAD program as stated in the RAD Fair Housing, Civil Rights, and Relocation Notice. Please see Attachment O beginning on page 249 for the full text of this RAD Fair Housing, Civil Rights, and Relocation Notice.

II – Site Selection and Neighborhood Standards

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

III – Voluntary Compliance Agreement, Consent Order or Consent Decree

NYCHA certifies that it is under a Voluntary Compliance Agreement (VCA), Monitor Agreement by and between NYCHA, HUD and the City of New York dated January 31, 2019 (the "Agreement"), and assorted consent decrees. RAD conversion at the NYCHA developments listed on pages 122– 174 will not have a negative impact on NYCHA's compliance with such existing VCA, Agreement or consent decrees.

ATTACHMENT C
CAPITAL IMPROVEMENTS

NYCHA submitted the FY 2026 Plan and Five-Year Action Plan to HUD on April 7, 2026. The Plan was approved by HUD in EPIC on April 21, 2026.

Members of the public wishing to examine the Supporting Documents may do so, during regular business hours, by contacting NYCHA's central office, located at 90 Church Street, New York, New York, at (212) 306-3123 or by emailing annualplancomments@nycha.nyc.gov to schedule an appointment to review the documents.

FY 2026 CAPITAL FUND ANNUAL STATEMENT/PERFORMANCE AND EVALUATION REPORT AND 5-YEAR ACTION PLAN

On May 12 and May 13, 2026, NYCHA presented an overview of the Authority's Capital Planning Program and the FY 2026-2030 5-Year Action Plan to the Resident Advisory Board (RAB). NYCHA's FY 2026 Capital Fund Annual Statement/Performance and Evaluation Report and 5-Year Capital Plan (FY 2026 – 2030) are included in the Draft Plan on pages 176 through 188.

NYCHA plans to restore units converted through Transfer of Assistance and return them to the Public Housing program. NYCHA is evaluating the potential use of Public Housing funds to do this. Please see page 28 in the Executive Summary and pages 134-149 in Attachment B for more information about the Transfer of Assistance initiative.

Capital Fund Five - Year Action Plan*

Part I: Summary

PHA Name	X Original 5-Year Plan
New York City Housing Authority	Revision No:

Development Number and Name	**Work Statement for Year 1**	**Work Statement for Year 2**	**Work Statement for Year 3**	**Work Statement for Year 4**	**Work Statement for Year 5**
	FFY Grant: FY26	**FFY Grant: FY27**	**FFY Grant: FY28**	**FFY Grant: FY29**	**FFY Grant: FY30**
Physical Improvements	349,443,418	335,475,547	335,475,547	333,225,548	333,225,548
Management Improvements	28,484,156	19,963,895	21,280,406	20,280,406	21,280,406
PHA-Wide Non-dwelling Structures and Equipment	10,500,000	1,620,261	303,750	1,303,750	303,750
Administration	73,129,283	73,129,283	73,129,283	73,129,283	73,129,283
Other	43,030,562	44,505,053	44,512,298	46,758,480	46,767,937
Operations	182,823,207	182,823,207	182,823,206	182,823,206	182,823,206
Demolition	6,067,000	35,963,000	35,963,000	35,963,000	35,963,000
Development	0	0	0	0	0
Capital Fund Financing - Debt Service	37,815,201	37,812,581	37,805,336	37,809,153	37,799,696
Total CFP Funds	**731,292,826**	**731,292,826**	**731,292,826**	**731,292,826**	**731,292,826**
Total Non-CFP Funds	**0**	**0**	**0**	**0**	**0**
Grand Total	**731,292,826**	**731,292,826**	**731,292,826**	**731,292,826**	**731,292,826**

Part I: Summary		Part I: Summary			
PHA Name: New York City Housing Authority		Grant Type and Number Capital Fund Program Grant No: Date of CFFP:		AW_CF2026 Replacement Housing Factor Grant No:	FFY of Grant: FFY_2026 FFY of Grant Approval: FFY_2026
Type of Grant	Original Annual Statement Performance and Evaluation for Period Ending:	Reserve for Disasters/ Emergencies		Revised Annual Statement (revision no:) Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost Original	Total Estimated Cost Revised	Total Actual Cost Obligated	Total Actual Cost Expended
1	Total non-CFP Funds	0.00	0.00	0.00	0.00
2	1406 Operations (may not exceed 20% of line 15)	182,823,206.50	0.00	0.00	0.00
3	1408 Management Improvements	28,484,156.00	0.00	0.00	0.00
4	1410 Administration (may not exceed 10% of line 15)	73,129,282.60	0.00	0.00	0.00
5	1480 General Capital Activity	409,040,980.35	0.00	0.00	0.00
6	1492 Moving to Work Demonstration	0.00	0.00	0.00	0.00
7	1501 Collateralization or Debt	0.00	0.00	0.00	0.00
8	1503 RAD	0.00	0.00	0.00	0.00
9	1504 RAD Investment Activity	0.00	0.00	0.00	0.00
10	1505 RAD-CPT	0.00	0.00	0.00	0.00
11	9000 Debt Reserves	0.00	0.00	0.00	0.00
12	9001 Bond Debt Obligation	37,815,200.55	0.00	0.00	0.00
13	9002 Loan Debt Obligation	0.00	0.00	0.00	0.00
14	9900 Post Audit Adjustment	0.00	0.00	0.00	0.00
15	Amount of Annual Grant: (sum of line 2-14)	731,292,826.00	0.00	0.00	0.00
16	Amount of line 15 Related to LBP Activities	50,200,000.00	0.00	0.00	0.00
17	Amount of line 15 Related to Section 504 Compliance	0.00	0.00	0.00	0.00
18	Amount of line 15 Related to Security - Soft Costs	0.00	0.00	0.00	0.00
19	Amount of line 15 Related to Security - Hard Costs	0.00	0.00	0.00	0.00

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Part I: Summary		Part I: Summary			
PHA Name: New York City Housing Authority		Grant Type and Number Capital Fund Program Grant No: Date of CFFP:		AW_CF2026 Replacement Housing Factor Grant No:	FFY of Grant: FFY_2026 FFY of Grant Approval: FFY_2026
Type of Grant	Original Annual Statement Performance and Evaluation for Period Ending:	Reserve for Disasters/ Emergencies		Revised Annual Statement (revision no:) Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost Original	Total Estimated Cost Revised	Total Actual Cost Obligated	Total Actual Cost Expended
20	Amount of line 20 Related to Energy Conservation Measures	0.00	0.00	0.00	0.00

Signature of Executive Director	Date	Signature of Public Housing Director	Date

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Part II: Supporting Pages PHA Name: New York City Housing Authority			Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:	AW_CF2026		CFFP (Yes/No): No	Federal FFY of Grant: FFY_2026		
Development Number Name / PHA-Wide Activities	General Description of Major Work Categories		Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original Budget	Original	Revised	Funds Obligated	Funds Expended	
AMSTERDAM (NY005010220P)				1,461					
	WT_General Construction	PR_015064							Planned
			1480 GENERAL CAPITAL ACTIVITY		4,500,000	0	0	0	
ATLANTIC TERMINAL SITE 4B (NY005011630P)				1,029					
	WT_Brickwork_Roofs	PR_014194							Planned
			1480 GENERAL CAPITAL ACTIVITY		10,000,000	0	0	0	
BARUCH (NY005010600P)				2,391					
	WT_Fire Alarm	PR_009574							Planned
			1480 GENERAL CAPITAL ACTIVITY		102,077	0	0	0	
BAY VIEW (NY005020920P)				1,610					
	WT_RAD Funds Pre Closing	PR_013958							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
BRONX RIVER (NY005010320P)				1,554					
	WT_Boilers	PR_010399							Planned
			1480 GENERAL CAPITAL ACTIVITY		5,000,000	0	0	0	
BRYANT AVE - EAST 174TH ST (NY005015300P)				830					
	WT_RAD Funds Pre Closing	PR_015484							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
CAMPOS PLAZA II (NY005012570P)				493					
	WT_RAD Funds Pre Closing	PR_013949							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
CASTLE HILL (NY005020800P)				2,025					
	WT_Office Upgrades	PR_015786							Planned
			1480 GENERAL CAPITAL ACTIVITY		6,500,000	0	0	0	
DOUGLASS ADDITION (NY005010820P)				2,352					
	WT_Fire Alarm	PR_009577							Planned
			1480 GENERAL CAPITAL ACTIVITY		1,442,092	0	0	0	
DYCKMAN (NY005000410P)				1,167					
	WT_Fire Alarm	PR_009575							Planned
			1480 GENERAL CAPITAL ACTIVITY		217,736	0	0	0	
	WT_Boilers	PR_010464							Planned
			1480 GENERAL CAPITAL ACTIVITY		6,725,258	0	0	0	
EAST 152ND ST - COURTLAND AVE (NY005010280P)				1,244					
	WT_RAD Funds Pre Closing	PR_014059							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
EAST 165TH ST - BRYANT AVENUE (NY005015300P)				830					
	WT_RAD Funds Pre Closing	PR_015485							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
EAST 173RD ST - VYSE AVENUE (NY005015300P)				830					
	WT_RAD Funds Pre Closing	PR_015486							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	

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Part II: Supporting Pages PHA Name: New York City Housing Authority			Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:	AW_CF2026		CFFP (Yes/No): No	Federal FFY of Grant:	FFY_2026	
Development Number Name / PHA-Wide Activities	General Description of Major Work Categories		Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original Budget	Original	Revised	Funds Obligated	Funds Expended	
GRANT (NY005000870P)				1,940					
	WT_Boilers	PR_010407							Planned
			1480 GENERAL CAPITAL ACTIVITY		12,000,000	0	0	0	
HARBORVIEW TERRACE (NY005010220P)				1,461					
	WT_Roofs	PR_011301							Planned
			1480 GENERAL CAPITAL ACTIVITY		7,000,000	0	0	0	
HERNANDEZ (NY005011000P)				1,510					
	WT_RAD Funds Pre Closing	PR_015489							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
HOE AVE - EAST 173RD ST (NY005015300P)				830					
	WT_RAD Funds Pre Closing	PR_015490							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
HUNTS POINT AVE REHAB (NY005015300P)				830					
	WT_RAD Funds Pre Closing	PR_015487							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
INGERSOLL (NY005000140P)				1,840					
	WT_Roofs	PR_014195							Planned
			1480 GENERAL CAPITAL ACTIVITY		8,082,060	0	0	0	
LONGFELLOW AVENUE REHAB (NY005015300P)				830					
	WT_RAD Funds Pre Closing	PR_015488							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
MARBLE HILL (NY005020490P)				1,682					
	WT_Roofs	PR_014661							Planned
			1480 GENERAL CAPITAL ACTIVITY		1,943,086	0	0	0	
MELTZER TOWER (NY005011000P)				1,510					
	WT_RAD Funds Pre Closing	PR_015491							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
MITCHEL (NY005011450P)				1,829					
	WT_Boilers	PR_010409							Planned
			1480 GENERAL CAPITAL ACTIVITY		21,139,415	0	0	0	
MOORE (NY005010930P)				671					
	WT_RAD Funds Pre Closing	PR_013937							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
POLO GROUNDS TOWER (NY005001490P)				1,614					
	WT_Brickwork	PR_010085							Planned
			1480 GENERAL CAPITAL ACTIVITY		36,384,034	0	0	0	
	WT_A and E	PR_011495							Planned
			1480 GENERAL CAPITAL ACTIVITY		20,000,000	0	0	0	
RANGEL (NY005000370P)				984					
	WT_RAD Funds Pre Closing	PR_014071							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	

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Part II: Supporting Pages PHA Name: New York City Housing Authority			Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:	AW_CF2026		CFFP (Yes/No): No	Federal FFY of Grant: FFY_2026		
Development Number Name / PHA-Wide Activities	General Description of Major Work Categories		Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original Budget	Original	Revised	Funds Obligated	Funds Expended	
SAINT NICHOLAS (NY005000380P)				1,526					
	WT_Major Renovation	PR_012254							Planned
			1480 GENERAL CAPITAL ACTIVITY		127,497	0	0	0	
SEWARD PARK EXT (NY005011000P)				1,510					
	WT_RAD Funds Pre Closing	PR_015492							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
SOUTH BEACH (NY005010350P)				699					
	WT_Boilers	PR_009452							Planned
			1480 GENERAL CAPITAL ACTIVITY		8,770,000	0	0	0	
SURFSIDE GARDENS (NY005011700P)				1,510					
	WT_Plumbing	PR_010431							Planned
			1480 GENERAL CAPITAL ACTIVITY		2,400,000	0	0	0	
TODT HILL (NY005000520P)				1,008					
	WT_Major Renovation	PR_010115							Planned
			1480 GENERAL CAPITAL ACTIVITY		608,503	0	0	0	
WALD (NY005000230P)				1,861					
	WT_Roofs	PR_013143							Planned
			1480 GENERAL CAPITAL ACTIVITY		11,834,101	0	0	0	
WEST FARMS SQUARE - CONVENTIONAL (NY005015310P)				356					
	WT_RAD Funds Pre Closing	PR_015493							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
WEST TREMONT REHAB (GROUP 1) (NY005013410P)				877					
	WT_RAD Funds Pre Closing	PR_013955							Planned
			1480 GENERAL CAPITAL ACTIVITY		100,000	0	0	0	
WOODSIDE (NY005000330P)				1,357					
	WT_Heating	PR_012303							Planned
			1480 GENERAL CAPITAL ACTIVITY		13,310,591	0	0	0	
WYCKOFF GARDENS (NY005011630P)				1,029					
	WT_Major Renovation	PR_012953							Planned
			1480 GENERAL CAPITAL ACTIVITY		10,000,000	0	0	0	

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Part II: Supporting Pages PHA Name: New York City Housing Authority		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:		AW_CF2026 CFFP (Yes/No): No		Federal FFY of Grant: FFY_2026		
Development Number Name / PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
PHA WIDE ITEM (PR_003482)	WT_Management Fees							Planned
		1410 ADMINISTRATIVE SALARIES		73,129,283	0	0	0	
PHA WIDE ITEM (PR_003921)	WT_Contingency							Planned
		1480 GENERAL CAPITAL ACTIVITY		25,144,433	0	0	0	
PHA WIDE ITEM (PR_005060)	WT_Contingency							Planned
		1480 GENERAL CAPITAL ACTIVITY		17,886,129	0	0	0	
PHA WIDE ITEM (PR_005567)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		31,502	0	0	0	
								Planned
		1408 MGMT IMPROVEMENT PROGRAMS		31,502	0	0	0	
PHA WIDE ITEM (PR_006460)	WT_Debt Service							Planned
		9001 BOND DEBT OBLIGATION		37,815,201	0	0	0	
PHA WIDE ITEM (PR_006859)	WT_Reimb To Operate							Planned
		1406 OPERATIONS		182,823,207	0	0	0	
PHA WIDE ITEM (PR_008883)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		185,000	0	0	0	
PHA WIDE ITEM (PR_008886)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		119,444	0	0	0	
PHA WIDE ITEM (PR_010235)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		485,985	0	0	0	
PHA WIDE ITEM (PR_010236)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		1,529,033	0	0	0	
PHA WIDE ITEM (PR_010238)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		500,000	0	0	0	
PHA WIDE ITEM (PR_010239)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		749,075	0	0	0	
PHA WIDE ITEM (PR_010242)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		316,800	0	0	0	
PHA WIDE ITEM (PR_010243)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		135,000	0	0	0	
PHA WIDE ITEM (PR_010246)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		1,720,367	0	0	0	
PHA WIDE ITEM (PR_010247)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		1,269,515	0	0	0	
PHA WIDE ITEM (PR_010248)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		6,510,020	0	0	0	
PHA WIDE ITEM (PR_010250)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		677,847	0	0	0	
PHA WIDE ITEM (PR_010604)	WT_Ventilation							Planned
		1480 GENERAL CAPITAL ACTIVITY		2,000,000	0	0	0	
PHA WIDE ITEM (PR_010672)	WT_A and E							Planned

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Part II: Supporting Pages PHA Name: New York City Housing Authority		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:		AW_CF2026 CFFP (Yes/No): No		Federal FFY of Grant: FFY 2026		
Development Number Name / PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
		1480 GENERAL CAPITAL ACTIVITY		3,000,000	0	0	0	
PHA WIDE ITEM (PR_011309)	WT_A and E							Planned
		1480 GENERAL CAPITAL ACTIVITY		1,000,000	0	0	0	
PHA WIDE ITEM (PR_012398)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		2,160,000	0	0	0	
PHA WIDE ITEM (PR_012399)	WT_Relocation							Planned
		1480 GENERAL CAPITAL ACTIVITY		1,000,000	0	0	0	
PHA WIDE ITEM (PR_012400)	WT_Mold							Planned
		1480 GENERAL CAPITAL ACTIVITY		2,000,000	0	0	0	
PHA WIDE ITEM (PR_012410)	WT_Asbestos							Planned
		1480 GENERAL CAPITAL ACTIVITY		5,817,000	0	0	0	
PHA WIDE ITEM (PR_012544)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		225,000	0	0	0	
PHA WIDE ITEM (PR_012756)	WT_A and E							Planned
		1480 GENERAL CAPITAL ACTIVITY		14,836,818	0	0	0	
PHA WIDE ITEM (PR_013091)	WT_A and E							Planned
		1480 GENERAL CAPITAL ACTIVITY		10,000,000	0	0	0	
PHA WIDE ITEM (PR_013173)	WT_Lead Based Paint							Planned
		1480 GENERAL CAPITAL ACTIVITY		20,000,000	0	0	0	
PHA WIDE ITEM (PR_013175)	WT_Consulting Costs							Planned
		1480 GENERAL CAPITAL ACTIVITY		3,097,120	0	0	0	
PHA WIDE ITEM (PR_013231)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		4,425,512	0	0	0	
PHA WIDE ITEM (PR_013293)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		306,761	0	0	0	
PHA WIDE ITEM (PR_013417)	WT_General Construction							Planned
		1480 GENERAL CAPITAL ACTIVITY		1,500,000	0	0	0	
PHA WIDE ITEM (PR_013888)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		1,015,000	0	0	0	
PHA WIDE ITEM (PR_014096)	WT_General Construction							Planned
		1480 GENERAL CAPITAL ACTIVITY		35,760,000	0	0	0	
PHA WIDE ITEM (PR_014214)	WT_A and E							Planned
		1480 GENERAL CAPITAL ACTIVITY		5,000,000	0	0	0	
PHA WIDE ITEM (PR_014228)	WT_Boilers							Planned
		1480 GENERAL CAPITAL ACTIVITY		17,000,000	0	0	0	
PHA WIDE ITEM (PR_014230)	WT_Environmental							Planned
		1480 GENERAL CAPITAL ACTIVITY		1,000,000	0	0	0	
PHA WIDE ITEM (PR_014232)	WT_General Construction							Planned
		1480 GENERAL CAPITAL ACTIVITY		20,000,000	0	0	0	
PHA WIDE ITEM (PR_014574)	WT_A and E							Planned
		1480 GENERAL CAPITAL ACTIVITY		250,000	0	0	0	

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Part II: Supporting Pages PHA Name: New York City Housing Authority		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:		AW_CF2026 CFFP (Yes/No): No		Federal FFY of Grant: FFY: 2026		
Development Number Name / PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
PHA WIDE ITEM (PR_014987)	WT_Lead Based Paint							Planned
		1480 GENERAL CAPITAL ACTIVITY		700,000	0	0	0	
PHA WIDE ITEM (PR_015099)	WT_Asbestos							Planned
		1480 GENERAL CAPITAL ACTIVITY		250,000	0	0	0	
PHA WIDE ITEM (PR_015100)	WT_Lead Based Paint							Planned
		1480 GENERAL CAPITAL ACTIVITY		3,200,000	0	0	0	
PHA WIDE ITEM (PR_015101)	WT_Lead Based Paint							Planned
		1480 GENERAL CAPITAL ACTIVITY		1,200,000	0	0	0	
PHA WIDE ITEM (PR_015355)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		265,063	0	0	0	
PHA WIDE ITEM (PR_015377)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		5,533,232	0	0	0	
PHA WIDE ITEM (PR_015452)	WT_Elevators							Planned
		1480 GENERAL CAPITAL ACTIVITY		3,479,968	0	0	0	
PHA WIDE ITEM (PR_015709)	WT_General Construction							Planned
		1480 GENERAL CAPITAL ACTIVITY		1,000,000	0	0	0	
PHA WIDE ITEM (PR_015710)	WT_Elevators							Planned
		1480 GENERAL CAPITAL ACTIVITY		4,000,000	0	0	0	
PHA WIDE ITEM (PR_015726)	WT_Mold							Planned
		1480 GENERAL CAPITAL ACTIVITY		250,000	0	0	0	
PHA WIDE ITEM (PR_015784)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		74,000	0	0	0	
PHA WIDE ITEM (PR_015785)	WT_IT Hardware and Software							Planned
		1408 MGMT IMPROVEMENT PROGRAMS		250,000	0	0	0	
PHA WIDE ITEM (PR_015787)	WT_Ranges							Planned
		1480 GENERAL CAPITAL ACTIVITY		10,500,000	0	0	0	
PHA WIDE ITEM (PR_015788)	WT_Plumbing							Planned
		1480 GENERAL CAPITAL ACTIVITY		500,000	0	0	0	
PHA WIDE ITEM (PR_015789)	WT_FIRE RESTORATION							Planned
		1480 GENERAL CAPITAL ACTIVITY		6,500,000	0	0	0	
PHA WIDE ITEM (PR_015802)	WT_Heating							Planned
		1480 GENERAL CAPITAL ACTIVITY		1,483,062	0	0	0	
PHA WIDE ITEM (Project Codes)								Planned
		1406 OPERATIONS		182,823,207	0	0	0	
		1408 MGMT IMPROVEMENT PROGRAMS		28,484,156	0	0	0	
		1410 ADMINISTRATIVE SALARIES		73,129,283	0	0	0	
		9001 BOND DEBT OBLIGATION		37,815,201	0	0	0	
		1480 GENERAL CAPITAL ACTIVITY		219,354,530	0	0	0	
		Award Total:		731,292,826	0	0	0	

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Capital Fund Five - Year Action Plan*

Part I: Summary

PHA Name	X Original 5-Year Plan
New York City Housing Authority	Revision No:

Development Number / Name / HA-Wide	Work Statement for Year 1 (See Annual Statement)	Work Statement for Year 2 FFY Grant: FY27 PHA FY: FY27	Work Statement for Year 3 FFY Grant: FY28 PHA FY: FY28	Work Statement for Year 4 FFY Grant: FY29 PHA FY: FY29	Work Statement for Year 5 FFY Grant: FY30 PHA FY: FY30
GOWANUS (NY005000250P)		292,052	0	0	0
GRANT (NY005000870P)		2,000,000	5,000,000	0	0
INGERSOLL (NY005000140P)		16,164,120	20,164,120	0	0
LAFAYETTE (NY005001220P)		58,800	0	0	0
MARCY (NY005000210P)		0	286,815	0	0
PHA WIDE - CAPITAL PROJECTS		0	25,000,000	45,000,000	25,000,000
POLO GROUNDS TOWER (NY005001490P)		56,762,744	77,540,766	93,848,238	65,000,000
SAINT NICHOLAS (NY005000380P)		84,058,185	0	0	0
SOUTH BEACH (NY005010350P)		4,147,491	5,000,000	0	0
TODT HILL (NY005000520P)		30,941,815	0	0	0
TOMPKINS (NY005011310P)		0	117,600	0	0
WAGNER (NY005010740P)		7,378,737	24,757,474	4,757,474	0
WOODSIDE (NY005000330P)		8,482,347	15,002,343	9,659,657	0
PHA WIDE ITEM - WT_A and E		34,086,818	36,086,818	36,086,818	36,086,819
PHA WIDE ITEM - WT_Consulting Costs		3,097,120	3,097,120	3,097,120	3,097,120
PHA WIDE ITEM - WT_Boilers		17,000,000	17,000,000	17,000,000	17,000,000
PHA WIDE ITEM - WT_Heating		18,000,000	43,037,183	35,641,429	55,525,344
PHA WIDE ITEM - WT_IT Hardware and Software		21,584,156	21,584,156	21,584,156	21,584,156

*Year five of this Five Year Plan submission is based on the last year of NYCHA's current Board Approved FY2016 Five Year Capital Plan. Subsequent Board Approved Capital Plans will provide updated information on planned projects.

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Capital Fund Five - Year Action Plan*

Part I: Summary

PHA Name	X Original 5-Year Plan
New York City Housing Authority	Revision No:

Development Number / Name / HA-Wide	Work Statement for Year 1 (See Annual Statement)	Work Statement for Year 2 FFY Grant: FY27 PHA FY: FY27	Work Statement for Year 3 FFY Grant: FY28 PHA FY: FY28	Work Statement for Year 4 FFY Grant: FY29 PHA FY: FY29	Work Statement for Year 5 FFY Grant: FY30 PHA FY: FY30
PHA WIDE ITEM - WT_Elevators		3,479,968	28,035,308	52,784,812	34,005,313
PHA WIDE ITEM - WT_Relocation		1,000,000	1,000,000	1,000,000	1,000,000
PHA WIDE ITEM - WT_Contingency		44,505,053	44,512,298	46,758,480	46,767,937
PHA WIDE ITEM - WT_Debt Service		37,812,581	37,805,336	37,809,153	37,799,696
PHA WIDE ITEM - WT_Management Fees		73,129,283	73,129,283	73,129,283	73,129,283
PHA WIDE ITEM - WT_Reimb To Operate		182,823,207	182,823,206	182,823,206	182,823,206
PHA WIDE ITEM - WT_Asbestos		35,963,000	35,963,000	35,963,000	35,963,000
PHA WIDE ITEM - WT_Environmental		1,000,000	1,000,000	1,000,000	1,000,000
PHA WIDE ITEM - WT_Lead Based Paint		25,100,000	25,100,000	25,100,000	25,100,000
PHA WIDE ITEM - WT_Mold		2,250,000	2,250,000	2,250,000	2,250,000
PHA WIDE ITEM - WT_Ventilation		2,000,000	2,000,000	2,000,000	2,000,000
PHA WIDE ITEM - WT_Apartment Renovation		4,175,350	0	0	0
PHA WIDE ITEM - WT_General Construction		14,000,000	4,000,000	4,000,000	4,000,000
PHA WIDE ITEM - WT_Roofs		0	0	0	62,160,952
TOTALS		**731,292,826**	**731,292,826**	**731,292,826**	**731,292,826**

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Capital Fund Program Five-Year Action Plan*
Part II: Supporting Pages -- Work Activities

Development Number/Name/HA-Wide		Activities for Year 1 (See Annual Statement)	Activities for Year 2 FFY Grant: FY27 PHA FY: FY27	Activities for Year 3 FFY Grant: FY28 PHA FY: FY28	Activities for Year 4 FFY Grant: FY29 PHA FY: FY29	Activities for Year 5 FFY Grant: FY30 PHA FY: FY30
GOWANUS (NY005000250P)	WT_Fire Alarm		292,052	0	0	0
GRANT (NY005000870P)	WT_Boilers		2,000,000	5,000,000	0	0
INGERSOLL (NY005000140P)	WT_Roofs		16,164,120	20,164,120	0	0
LAFAYETTE (NY005001220P)	WT_Fire Alarm		58,800	0	0	0
MARCY (NY005000210P)	WT_Fire Alarm		0	286,815	0	0
PHA WIDE - CAPITAL PROJECTS	WT_Exterior Compactors		0	25,000,000	45,000,000	25,000,000
POLO GROUNDS TOWER (NY005001490P)	WT_A and E		20,000,000	20,000,000	20,000,000	20,000,000
	WT_Brickwork		36,762,744	45,214,412	45,000,000	45,000,000
	WT_Roofs		0	12,326,354	28,848,238	0
SAINT NICHOLAS (NY005000380P)	WT_Major Renovation		84,058,185	0	0	0
SOUTH BEACH (NY005010350P)	WT_Boilers		4,147,491	5,000,000	0	0
TODT HILL (NY005000520P)	WT_Major Renovation		30,941,815	0	0	0
TOMPKINS (NY005011310P)	WT_Fire Alarm		0	117,600	0	0
WAGNER (NY005010740P)	WT_Roofs		7,378,737	24,757,474	4,757,474	0
WOODSIDE (NY005000330P)	WT_Heating		8,482,347	15,002,343	9,659,657	0
PHA WIDE ITEM	WT_A and E		34,086,818	36,086,818	36,086,818	36,086,819
	WT_Consulting Costs		3,097,120	3,097,120	3,097,120	3,097,120
	WT_Boilers		17,000,000	17,000,000	17,000,000	17,000,000
	WT_Heating		18,000,000	43,037,183	35,641,429	55,525,344
	WT_IT Hardware and Software		21,584,156	21,584,156	21,584,156	21,584,156
	WT_Elevators		3,479,968	28,035,308	52,784,812	34,005,313
	WT_Relocation		1,000,000	1,000,000	1,000,000	1,000,000
	WT_Contingency		44,505,053	44,512,298	46,758,480	46,767,937
	WT_Debt Service		37,812,581	37,805,336	37,809,153	37,799,696
	WT_Management Fees		73,129,283	73,129,283	73,129,283	73,129,283

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Capital Fund Program Five-Year Action Plan*
Part II: Supporting Pages -- Work Activities

Development Number/Name/HA-Wide	Activities for Year 1 (See Annual Statement)	Activities for Year 2 FFY Grant: FY27 PHA FY: FY27	Activities for Year 3 FFY Grant: FY28 PHA FY: FY28	Activities for Year 4 FFY Grant: FY29 PHA FY: FY29	Activities for Year 5 FFY Grant: FY30 PHA FY: FY30
WT_Reimb To Operate		182,823,207	182,823,206	182,823,206	182,823,206
WT_Asbestos		35,963,000	35,963,000	35,963,000	35,963,000
WT_Environmental		1,000,000	1,000,000	1,000,000	1,000,000
WT_Lead Based Paint		25,100,000	25,100,000	25,100,000	25,100,000
WT_Mold		2,250,000	2,250,000	2,250,000	2,250,000
WT_Ventilation		2,000,000	2,000,000	2,000,000	2,000,000
WT_Apartment Renovation		4,175,350	0	0	0
WT_General Construction		14,000,000	4,000,000	4,000,000	4,000,000
WT_Roofs		0	0	0	62,160,952
TOTAL		**731,292,826**	**731,292,826**	**731,292,826**	**731,292,826**

*Year five of this Five Year Plan submission is based on the last year of NYCHA's current Board Approved FY2016 Five Year Capital Plan. Subsequent Board Approved Capital Plans will provide updated information on planned projects.

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ATTACHMENT D
HOUSING NEEDS

[24 CFR Part 903.7(a)]

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

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

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% of AMI	999,581	5	5	4	1	3	4
Income >30% but <=50% of AMI	509,163	5	5	4	1	3	4
Income >50% but <80% of AMI	604,082	5	5	3	1	3	3
Elderly (62+)	1,044,737	5	5	4	4	2	3
Families with Disabilities	561,596	5	5	3	4	3	3
Race/Ethnicity							
Hispanic	852,217	5	5	4	1	3	4
Black	667,094	5	5	4	1	3	4
White	1,207,029	5	5	4	1	3	4
Asian	444,429	5	5	4	1	3	4
Other	163,324	5	5	4	1	3	4

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

☐ Consolidated Plan of the Jurisdiction (Indicate year:_____)
☐ American Housing Survey data (Indicate year:_____)
☒ Other housing market study (Indicate year: 2020 – 2024)
☒ Other sources: (list and indicate year of information)

Data on the Housing Needs of Families in the Jurisdiction by Family Type was compiled by the Population Division of the New York City Department of City Planning utilizing data from: U.S. Census Bureau, 2020-2024 American Community Survey—Public Use Microdata Sample.

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

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

Housing Needs of Families on the PHA's Waiting Lists – Public Housing (As of 4/1/2026)			
Waiting list type: (select one) ☐ Section 8 tenant-based assistance ☒ Public Housing ☐ Combined Section 8 and Public Housing ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/sub jurisdiction:			
	# of Families	% of Total Families	Annual Turnover[23]
Waiting list total	159,357		2.4%
Extremely low income <=30% AMI	130,879	82%	
Very low income (>30% but <=50% AMI)	23,200	15%	
Low income (>50% but <=80% AMI)	5,277	3%	
Income Not Reported	1	0%	
Families with children	57,294	36%	
Elderly families	39,805	25%	
Families with Disabilities[24]	23,103	14%	
Race/Ethnicity			
White	9,879	6%	
Black	25,324	16%	
Hispanic	68,388	44%	
Asian	16,295	10%	
Native American	1,457	1%	
Native Hawaiian	331	0%	
Other	37,683	24%	
Characteristics by Bedroom Size			
0 BR	76,556	48%	
1BR	26,830	17%	
2 BR	43,752	27%	
3 BR	9,846	6%	
4 BR	2,301	1%	
5+ BR	70	0%	
Data Not Available	2	0%	

[23] Figure represents turnover (move-outs from Public Housing) during 2025.

[24] "Disabled" indicates a person, regardless of age, who falls within the definition of "disability" contained in §233 of the Social Security Act.

Housing Needs of Families on the PHA's Waiting Lists – Section 8 (As of 4/02/2026)			
Waiting list type: (select one) ☒ Section 8 tenant-based assistance ☐ Public Housing ☐ Combined Section 8 and Public Housing ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/sub-jurisdiction:			
	# of Families	**% of Total Families**	**Annual Turnover**
Waiting list total[25]	201,749		3.23%
Extremely low income <=30% AMI	N/A	N/A	
Very low income (>30% but <=50% AMI)	N/A	N/A	
Low income (>50% but <=80% AMI)	N/A	N/A	
Income Not Reported	N/A	N/A	
Families with Children	63,444	31.4%	
Elderly Families	33,368	16.5%	
Families with Disabilities[26]	24,561	12.2%	
Race/Ethnicity			
White	20,870	10.3%	
Black	60,211	29.8%	
Hispanic	85,797	42.5%	
Asian	11,762	5.8%	
Native American	1,634	0.8%	
Native Hawaiian	673	0.3%	
Other	20,802	10.3%	
Characteristics by Bedroom Size			
0 BR	N/A	N/A	
1 BR	N/A	N/A	
2 BR	N/A	N/A	
3 BR	N/A	N/A	
4+BR	N/A	N/A	
5+BR	N/A	N/A	
Data Not Available	N/A	N/A	

Note: Section 8 Waitlist Figures include Emergency Housing Vouchers that were added to the waitlist in 2025.

[25] Waiting list total includes both *extremely low-income* (below 30 percent of Area Median Income) and *very low-income* (30 percent to 50 percent of area median income) families.

[26] "Disabled" indicates a person, regardless of age, who falls within the definition of "disability" contained in §233 of the Social Security Act.

Housing Needs of Families on the PHA's Waiting Lists – Public Housing (As of 4/2/2026
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes, how long as it been closed (# of months)? Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes

Housing Needs of Families on the PHA's Waiting Lists – Section 8 (As of 4/1/2026)
Waiting list type: (select one) ☒ Section 8 tenant-based assistance ☐ Public Housing ☐ Combined Section 8 and Public Housing ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/sub-jurisdiction: *On August 1, 2024, NYCHA replenished its Section 8 waitlist with 200,000 applicants. NYCHA paused voucher issuance to waitlist applicants, effective August 1, 2025.*

Housing Needs of Families on the PHA's Waiting Lists – Section 8 (As of 4/1/2026)
Is the waiting list closed (select one)? ☐ No ☒ Yes *The New York City Housing Authority (NYCHA) reopened the waitlist to the general public for its Housing Choice Voucher (Section 8) Program from Monday, June 3, 2024, through Sunday, June 9, 2024. The waitlist is now closed to the general public.* 1. *NYCHA will continue accepting referrals from the following sources: (1) homeless referrals from New York City (NYC) agencies; (2) referrals from the New York City Administration for Children's Services (ACS) for youth in the Family Unification Program (FUP) whose assistance is expiring as a result of the term limit on their voucher without subsequent adequate housing; (3) referrals from ACS for FYI assistance for youth leaving foster care who are homeless or at risk of homelessness; (4) referrals by a prosecutorial or law enforcement agency for victims of domestic violence and intimidated witnesses; and (5) referrals from NYCHA's Public Housing Operations Department for public housing residents because their unit is not habitable, they are at risk of displacement, they are extremely under occupied or extremely over crowded, or they have been on the public housing transfer waitlist for two years or longer as a domestic violence (VDV), dating violence, sexual assault or stalking victim or seek transfer as a reasonable accommodation.* . If yes, how long has it been closed (# of months)? 660 days (as of 4/1/2026) Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☒ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☒ Yes

3. Strategy for Addressing Needs

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

(1) Strategies

Need: Shortage of affordable housing for all eligible populations.

Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by: (Select all that apply)

☒ Employ effective maintenance and management policies to minimize the number of public housing units off-line
☒ Reduce turnover time for vacated public housing units
☒ Reduce time to renovate public housing units
☒ Seek replacement of public housing units lost to the inventory through mixed finance development

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

Strategy 2. Increase the number of affordable housing units by: (Select all that apply)

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

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

Strategy 1. Target available assistance to families at or below 30% of AMI: (Select all that apply)

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

While NYCHA does not plan to exceed the federal targeting requirements, about 80% of the families admitted to public housing during calendar year 2025 were households with incomes at or below 30% of area median income.

☒ Exceed HUD federal targeting requirements for families at or below 30 percent of AMI in tenant-based section 8 assistance
☐ Employ admissions preferences aimed at families with economic hardships
☒ Adopt rent policies to support and encourage work
☐ Other: (list below)

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

Strategy 1. Target available assistance to families at or below 50% of AMI: (Select all that apply)

☒ Employ admissions preferences aimed at families who are working
☒ Adopt rent policies to support and encourage work
☐ Other: (list below)

Need: Specific Family Types: The Elderly

Strategy 1. Target available assistance to the elderly: (Select all that apply)

☒ Seek designation of public housing for the elderly

On June 13, 2025, NYCHA released a new Draft Designated Housing Plan for its current portfolio of elderly-only developments and buildings and requested HUD authorization to extend the designation for five years as per the requirements of 42 U.S.C. § 1437e, 24 CFR Part 5, and PIH 2005-2 (HA). NYCHA has operated designated housing for the elderly with HUD's approval since 1999, receiving permission to renew the designation at two-year intervals. By letter dated April 30, 2024, HUD informed NYCHA that it would be required to submit a new Designated Plan because the number of units in the Plan decreased by more than ten percent from the original 1999 approval of 9,849 units.

NYCHA prepared and released for public review and comment a draft Designated Plan as part of the Annual Plan process in June 2025, followed by a public hearing in July 2025. On April 28, 2026, NYCHA submitted a revised Designated Plan to reflect changes in eligibility criteria and to update data with respect to the developments and buildings covered in the designation as well as the increase in the elderly population in New York City and at NYCHA. The revised Plan is currently under HUD review.

The revised designation encompasses 5,770 public housing units in 22 elderly-only developments and 10 elderly-only buildings in 8 general population developments throughout the five boroughs of New York City. These units comprise 4% of NYCHA's total public housing inventory. There are 995 zero-bedroom units, 4,603 one-bedroom units, and 172 two-bedroom units covered in this Plan.

In the Plan, NYCHA revises its eligibility criteria for these elderly-only properties in accordance with the definition of "elderly family" in 24 CFR 5.403. Specifically, a household consisting of an elderly (62 and over) head of household or spouse/co-head and other non-elderly household members will be eligible to reside in these properties. In addition, the plan explains that fully-accessible units within the designated developments or buildings are available to eligible households, regardless of whether the household member requiring a fully-accessible unit is elderly or non-elderly.

Please see pages 66 to 81 for more information on NYCHA's Designated Plan.

☒ Apply for special-purpose vouchers targeted to the elderly, should they become available
☐ Other: (list below)

Need: Specific Family Types: Families with Disabilities.

Strategy 1. Target available assistance to Families with Disabilities: (Select all that apply)

☒ Seek designation of public housing for families with disabilities
☒ Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing

☒ Apply for special-purpose vouchers targeted to families with disabilities, should they become available
☐ Affirmatively market to local non-profit agencies that assist families with disabilities
☐ Other: (list below)

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

Strategy 1. Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs: (Select if applicable)

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

Strategy 2. Conduct activities to affirmatively further fair housing: (Select all that apply)

☒ Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
☒ Market the section 8 program to owners outside of areas of poverty /minority concentrations
☒ Other: Adoption of exception payment standards for high opportunity neighborhoods

(2) Reasons for Selecting Strategies

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

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

ATTACHMENT E
ADDITIONAL INFORMATION

2. STATEMENT OF PROGRESS IN MEETING MISSION AND GOALS – FY2025 to FY2029

NYCHA is providing updates on its goals for the FY2025-2029 five-year plan.

Lead-Based Paint
Goal: Management of Lead-Based Paint Risks

Objective: By 2020, NYCHA will use XRF technology to test over 134,000 apartments built before 1978. By the middle of 2019, as lead paint tests are completed, NYCHA will publish statistics on the progress of the testing initiative and its results. (https://my.nycha.info/PublicSite/Transparency/XrfReport)

- ***Progress:*** *In April 2019, NYCHA kicked off an unprecedented effort to test approximately 134,000 apartments for the presence of lead-based paint using high-tech XRF analyzers. Testing began at Harlem River Houses on April 15, 2019.*

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

  As of September 12, 2023, 108,236 apartments were tested using XRF technology at the 1.0 mg/cm^2 standard. Due to a change in the City's standard, NYCHA is now retesting all apartments at the new, lowered threshold of 0.5 mg/cm^2. NYCHA also suspended its testing of units at the old standard.

  As of March 2026, NYCHA successfully completed XRF testing in 137,803 units at the lower 0.5 mg/cm2 standard.

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

- ***Progress:*** *Both Williamsburg Houses and Harlem River Houses are part of NYCHA's PACT program, and the abatement requirements are being achieved through that program.*

  Williamsburg Houses converted in December 2021, and Harlem River Houses converted in February 2022. PACT partners for Harlem River Houses and Williamsburg Houses began abatement via removal at the City's new standard of 0.5 mg/cm^2 in 2022, which required additional testing after being converted to PACT and before abatement could start. As of November 30, 2024, Williamsburg Houses is reporting 100% of the units have been abated and as of April 2026, Harlem River Houses is reporting 99% of the units have been abated. These are the Early Abatement Developments specified in the Agreement, and abatement requires

building-by-building relocation. Reporting on NYCHA's field monitoring efforts and the PACT partners' progress is included in the Bi-Annual Compliance reports provided to the Monitor.

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

- ***Progress:*** *NYCHA continues to develop strategies to meet this objective. Part of the strategy is the NYCHA XRF initiative, which will test components in each apartment built prior to 1978, allowing NYCHA to define the scope of work and produce reliable cost estimates associated with abating each of its properties. The Action Plan for the $2.2 billion in City capital funds provided pursuant to the Agreement, which was approved by the Monitor in May 2021, allocates $771.8 million to a lead abatement pipeline that, combined with other funding sources, will be utilized to advance abatement across the portfolio. The Action Plan also allocated more than $450 million to comprehensively renovate two sites with pervasive mold conditions and units with several positive lead-based paint components. Finally, since December 2021 NYCHA also won two competitive grants from HUD – (i) a grant to abate lead-based paint at Red Hook Houses in the amount of $5 million, and (ii) a grant to abate lead-based paint in units with a child under 6 years old in the amount of $7.25 million.*

  Abatement is also performed in vacant units upon move-out. NYCHA has procured a program management firm that will run point on abating units using the two HUD grants and the $771.8 million in City Capital funds. The first phase of the program includes the expedited abatement of occupied child under 6 units that test positive at the City's new standard of 0.5 mg/cm² – the abatements will also be inclusive of positive components at the federal standard of 1.0 mg/cm². The second phase of the program will focus on re-testing those units that have not already been tested at the City's new standard of 0.5 mg/cm². Also included in the second phase are units that previously tested positive under the federal standard of 1.0 mg/cm²; while these units are included because they previously tested positive at the federal standard, all units will be re-tested prior to the abatement to the City's new standard of 0.5 mg/cm² to ensure all lead-based paint components that test positive above the City's standard are abated.

  As of March 2026, NYCHA completed lead abatement in 18,165 units. It is important to recognize that subsequent lead-based testing and abatement is also driven by vacant unit turnover and newly identified child under 6 units and there may be, consequently, units that overlap with the first or second phase. Units that require abatement that are identified during vacant unit turnover will not require relocation.

  Although developments converted to PACT are not included in the same required objective to abate all lead-based paint in the unit and interior and exterior common areas under the 2019 Agreement, NYCHA has extended the requirement to abate to PACT through policy memos implemented in 2019 and 2022. Under NYCHA policy, PACT partners are required to include abatement of units and common areas in the rehabilitation scope of work for all developments built prior to 1978.

From January 2019 to May 1, 2026, the PACT program has converted 26,981 units with 6,865 units expected to need abatement (6,321 of those units were tested at the City's new standard). As of May 1, 2026, PACT partners reported that 4,644 units have been abated of lead-based paint, approximately 68% of the units. Of the 4,644 abated units, 4,202 units were abated at the City's new standard. PACT partners are also performing abatement in the common areas of the converted developments.

Heat

Goal: Improving the Provision of Heat

Objective: NYCHA will comply with N.Y.C. Admin. Code § 27-2029(a), which requires NYCHA to maintain the following temperatures in apartments during the heating season (October 1 through May 31):

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

- ***Progress:*** *As required, NYCHA continues to work towards compliance with N.Y.C Admin. Code § 27-2029(a).*

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

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

- ***Progress:*** *The Monitor has worked with NYCHA to develop an interim methodology based on resident heat complaints and existing work order data. In their most recent quarterly report, the Monitor reported on heating service data at the apartment level for the first time since the HUD Agreement was signed.*

Goal: Improved Response to Heating Failure

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

a) Restore heat to units affected by a heating shortage within an average of 12 hours.
b) During the heating season, for 85% of heating shortfalls, NYCHA will restore heat to affected units within 24 hours, and in no event more than 48 hours. NYCHA may restore heat through the use of temporary replacement heating systems that comply with the N.Y.C. Admin. Code.
c) In any event in which heat is unable to be restored to a particular unit within 12 hours, appropriate NYCHA personnel distinct from the NYCHA personnel responsible for the heat restoration, as identified in an Action Plan, will undertake an investigation to determine the root cause(s) of such initial failure of the heating system and the failure to achieve the

restoration of service within the timeframe, identify corrections to prevent or lessen the recurrence of such failures, and track the implementation of such corrective actions. Such information will be retained in a central repository to which all applicable maintenance staff and management have access.

- ***Progress:*** *In the 2025-2026 heat season, NYCHA resolved its heat outages on average in 7.2 hours. 99% of outages (645 out of 653) were resolved within 24 hours. NYCHA continues to utilize the Heating Management Services Department (HMSD) 24/7 heat desk operation, where HMSD staff track work orders and use technology to identify triggers for potential service disruptions and quickly deploy staff. Moreover, during extreme cold days, NYCHA activates a "Situation Room" to coordinate the response for interruptions and mobilization of resources in real time, and the constant monitoring of outage data to identify issues proactively. NYCHA also reviews the causes of outages to identify system components that may require extensive repair and/or replacement. NYCHA uses this data to develop an operational investment strategy on where to use operating dollars to make the identified repairs and further identify opportunities for improving our response to heat outages*

Goal: Other Heating Obligations

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

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

    - ***Progress:*** *Since the HUD Agreement was signed in 2019, NYCHA has replaced 211 boilers at 55 developments. At certain of those and another 17 developments, NYCHA has ongoing, active projects to replace another 96 boilers, with a total of 308 forecasted to complete construction by the end of 2026. These projects are funded through a range of sources, including City capital dollars (including funds allocated pursuant to the City Capital Action Plan), State capital dollars, Sandy Recovery and Resilience funding, and federal capital funds, among others.*

      The goal to repair or replace 200 boilers through PACT by end of 2026 had previously been met. As of October 2025, NYCHA has repaired or replaced 261 boilers through the Permanent Affordability Commitment Together (PACT) Section 8 conversion program.

<u>Mold</u>

Goal: Decreasing Mold Incidence and Recurrence

Objective: By January 31, 2024:

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

- ***Progress:*** *As of February 2026, 86% of units and common area complaints did not have a second verified complaint.*

To address performance parameters related to reducing mold recurrence and limiting the square footage of new mold complaints, NYCHA continues to train staff in the Mold Busters process for mold inspections, remediation, and related repairs. In June 2024 NYCHA revised its Mold Standard Procedure, which was last updated in February 2020. Notable updates to the Mold Standard Procedure reflect new and already implemented IT enhancements. The updates include but are not limited to enhancing the drop-down of mold-related root causes available to NYCHA inspectors when creating remediation and repair work orders for mold, addition of the craft of Maintenance Workers to the list of titles able to perform mold repairs, revising the roles and responsibilities section to incorporate the Neighborhood Model, and updating the selection of approved materials for mold cleaning, encapsulation, and mold-resistant paint. NYCHA also completed its Alternative Paint Pilot project to prevent mold recurrences in March 2025, and as a result is currently using a second mold-resistant paint for mold remediation, in addition to being added to the Mold Standard Procedure.

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

Progress: *As of February 2026, 85% of verified mold complaints in units and 68.5% in common areas covered more than 10 square feet.*

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

- ***Progress:*** *As of February 2026, there were 267 units where mold appeared more than three times in the past year.*

Goal: Remediation of Mold and Moisture

Objective: By January 31, 2021:

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

Progress*: For work orders created in February 2026, NYCHA printed the written plan within five business days for 79% of verified mold complaints.*

To improve performance related to this metric, OMAR has launched two major initiatives. From September 2022 to July 2023, OMAR trained at least one Maintenance Worker per consolidation on the mold inspection process as per the Mold SP. This program provided additional support to Property Maintenance Supervisors and Assistance Property Maintenance Supervisors conducting initial mold inspections and mold quality assurance inspections.

Second, as part of the OMAR MII, OMAR deployed a team of inspectors to assist NYCHA Operations with addressing mold inspection work orders. As of March 23, 2026, MII has completed 3,728 inspections. Priority is given to the consolidations that are part of NYCHA's EOP, which seeks to improve mold and leak compliance at high-risk developments and other NYCHA consolidations with high mold inspection backlogs. As of March 23, 2026, OMAR staff completed 4,096 mold inspections, including initial inspections, mold quality assurance inspections, and re-inspections across all consolidations.

NYCHA's efforts to better prioritize mold inspections, aided by these initiatives, resulted in a 96% reduction in the number of open initial mold inspections (from 1,847 to 66 WOs) and an 92% reduction in the median days to inspect for mold (from 25 days to 2 days) from March 2022 to March 2026.

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

Progress: *As of February 2026, 62.5% of simple mold repairs were completed within 7 days, and 18% of complex repairs were completed within 15 days.*

NYCHA made notable progress to improve performance related to this metric. NYCHA introduced various targeted efforts listed below (2022 – 2025), including:

- *The Mold and Leak Performance Scorecard and Dashboard was launched in May 2022 in partnership with the Baez Independent Data Analyst. The Scorecard is a tracking tool that ranks each NYCHA consolidation on its mold and leak work order performance. The Scorecard tracks 11 key mold and leak metrics correlating to the compliance requirements outlined in the* Baez *and HUD agreements. The Scorecard builds visibility across multiple NYCHA owners and stakeholders, allows NYCHA to pinpoint where consolidations are trending negatively and deploys targeted initiatives to improve the compliance (e.g. the EOP, deploying specialized in-house crash teams to address mold inspections, mold cleaning, mold-resistant paint and vent cleaning work orders, vendor mobilization to address open Tub Enclosure work orders, and in-person outreach events to increase awareness of OMAR's Mold Response Unit (MRU) and OCC.*

- *EOP was launched in June 2022 in partnership with the Independent Data Analyst and Independent Mold Analyst and is ongoing. The EOP was designed to help identify and remove roadblocks to mold and leak compliance, and, where necessary, direct additional resources to ensure that mold and leak work orders are dealt with as quickly as possible. As part of the EOP, OMAR worked with 31 consolidations across five boroughs; 1 consolidation is currently in progress (Brownsville). All consolidations demonstrated a significant improvement during*

the program, and a majority of consolidations continued to make further progress towards improving mold and leak compliance upon EOP completion.

- *Operation Mold Clean Up (OMC) was launched by NYCHA in May 2022 and is ongoing. OMC is an effort by NYCHA Operations to prioritize and reduce the backlog of open Caretaker X and Painter mold removal work orders and outstanding mold-resistant paint work orders that remove the hazardous condition. NYCHA began Phase 6 of this initiative in January 2025. By March 16, 2026, NYCHA completed 93% (34,550 out of 37,093) of work orders as part of this initiative.*

- *ODO was launched by NYCHA in April 2023 and is ongoing. ODO is an effort by NYCHA Operations to address the backlog of open tub enclosure and plumbing work orders for mold and leak repairs. The Authority-wide effort tackles select plumbing and tub enclosure work orders that are 200-plus days old. NYCHA began Phase IV of this initiative in January 2026. By March 16, 2026, NYCHA completed 83% (10,027 out of 12,016) of the plumbing work orders and 71% (7,202 out of 10,099) of the tub enclosure work orders identified.*

- *MCI was launched in May 2022 by OMAR and is ongoing. To execute MCI, OMAR deployed a group of seasonal employees to assist NYCHA development staff in addressing their mold cleaning backlog. This program includes mold cleaning work orders assigned to Caretaker X staff and Painters. As of March 19, 2026 OMAR staff addressed 7,461 mold cleaning work orders.*

- *In January 2023, OMAR formed an in-house team to assist NYCHA Operations with addressing mold-resistant paint work orders. This initiative is currently ongoing. By March 19, 2026, OMAR painters resolved 2,079 mold-resistant paint work orders.*

- *The Building Line Initiative (BLI) was launched in June 2022 to address the underlying root causes of mold and leak conditions at high-need consolidations through comprehensive plumbing and renovation projects targeting the entire line. The scope of work generally includes plumbing renovation and upgrade (e.g., replacement of stack line, branch line of stack line, waste trap and lead bends, hot and cold water branch lines); demolition of chase wall and rebuild; installation of the new tub enclosure, bathtub, sink, toilet and other new fixtures; new floor tiles; new windows and balances; and painting with mold-resistant paint.*

    - *OMAR completed its first BLI project at Red Hook East (6 apartments) in January 2023.*
    - *OMAR completed its second BLI project at Tompkins (15 apartments and 1 storage space) in January 2026.*
    - *OMAR launched its third BLI project at Red Hook East (6 apartments in the B Line and 6 bathrooms in the A line) in Spring 2025. General construction is in progress and is estimated to be fully completed in December 2026.*
    - *OMAR launched its fourth BLI project at Carlton Mannor (10 apartments) in Summer 2025. Tenant relocation is complete and the estimated completion of the project is Spring of 2027.*

- *NYCHA launched MLRR in August 2025. As of March 2026, NYCHA has completed MLRR programs at 2 consolidated developments (Sotomayor and Whitman). Two more*

engagements at Ingersoll and Red Hook East are ongoing, As of April 2026, NYCHA has completed 1,882 work orders through MLRR.

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

- ***Progress:*** *As of February 2026 (cumulative), 68% of leaks and flooding conditions were abated within 24 hours.*

  To improve NYCHA's response to floods, leaks from above, excessive moisture, and other leak complaints, NYCHA published the Leak SP on May 19, 2025. The new standard procedure introduces a standardized comprehensive leak inspection and repair process to help NYCHA trace the source of the leaks, investigate, and document the root cause(s) of conditions, and ensure that the repair work is completed for all impacted units. Training in Queens and Staten Island began July 21, 2025, and combines classroom instruction, hands-on learning, and use of the iWM app. Training for Brooklyn began Winter 2025, Manhattan in Summer 2026, and the Bronx in 2026.

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

- ***Progress****: NYCHA launched and completed its Mold Busters resident informational campaign in 2021 and completed its roll-out of the Ombudsperson Call Center (OCC) in 2020. Both initiatives were aimed at improving communication and notification to tenants regarding mold issues.*

  The Mold Busters resident informational campaign included the development of targeted outreach and collateral materials, such as short videos and window clings that were shared with locations without mechanical ventilation. Since the OCC's roll-out, NYCHA's MRU has supported the OCC by using various engagement platforms to raise awareness of the OCC to NYCHA residents and by facilitating the resolution of resident mold and leak complaints made to the OCC. MRU manages everything from simple missed appointment complaints to complex complaints requiring substantial repair activity, multiple appointments, or relocation. MRU proactively works to ensure that OCC complaints are resolved to the residents' satisfaction. Since being launched in November 2019, the OCC has served nearly 33,500 NYCHA households (over 29,000 unique apartments) processing 21,781 resident-reported complaints associated with 17,309 unique apartments. As part of the MRU outreach efforts to raise awareness about the OCC, the MRU continues to attend NYCHA resident association Family Days (targeting at least 20 events per year) and engage directly with residents.

Elevators

Goal: Improving Elevator Service

Objective: By January 31, 2022:

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

- ***Progress:*** *NYCHA has substantially completed the Elevator HUD Agreement dashboard, which is undergoing additional enhancements. As of April 2026, 45% of elevator banks with more than one elevator had one or less instances where all elevators were out of service, and 26% of elevator banks with more than one elevator had more than three instances where all the elevators were out of service.*

b) 70% of elevators in all buildings will have an unplanned outage no more than eight times per year, and no elevator will have unplanned outages more than 15 times a year.

Progress: *As of April 2026, 69% of elevators in all buildings had an unplanned outage no more than eight times per year.*

NYCHA's Elevator Services and Repair Department (ESRD) continues to invest in equipment to enhance elevator service and to prevent outages from external causes. Below are some of the activities:

- *Installing air conditioners in motor rooms to reduce overheating equipment. As of September 2025, 2,229 air conditioners have been installed and are operational. No new air conditioners have been installed since September.*
- *Upgrading to Master Operator Variable Frequency (MOVFR) waterproof door operators to help prevent weather-related outages. As of September 2025, 364 water-resistant operators have been installed. No new MOVFRs have been installed.*
- *NYCHA's Elevator Services Repair Department (ESRD) has installed Electric Voltage Regulators (EVR) to increase voltage at select developments during summer months. This equipment helps prevent "no service conditions" in senior buildings when the local utility company lowers voltage.*
- *As of January 2026, 13 EVR units have been installed and signed off by the New York City Department of Buildings (DOB), 4 are currently in progress. In addition, the Elevator Department has asked NYCHA's Capital Projects team to include EVRs on all future modernizations.*

Goal: Improved Response to Disruptions in Service

Objective: For the first year after January 31, 2019, NYCHA will reduce the duration of service outages by 10%, and 75% of no-service conditions will be resolved within 18 hours of the time NYCHA learns of them. The response rate will improve each year thereafter as determined by

the Monitor and HUD based on the data NYCHA provides to the Monitor and HUD and the steps NYCHA has taken in executing its Action Plans.

- ***Progress:*** *For the period of April 2025 to April 2026, 94% of no service conditions were resolved within 18 hours.*

  - *NYCHA's Elevator Services Repair Department (ESRD) has installed Electric Voltage Regulators (EVR) to increase voltage at select developments during summer months. This equipment helps prevent "no service conditions" in senior buildings when the local utility company lowers voltage.*
  - *As of January 2026, 13 EVR units have been installed and signed off by the New York City Department of Buildings (DOB), 4 are currently in progress. In addition, the Elevator Department has asked NYCHA's Capital Projects team to include EVRs on all future modernizations.*

Goal: Other Obligations to Improve Elevator Service

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

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

- ***Progress:*** *Since the HUD Agreement was signed in 2019, construction has been completed at 288 elevators across 25 developments. An additional 11 elevators are being addressed through projects which are in the construction phase, with a total of 299 elevators forecasted to complete construction by the end of 2026.*
- *The PACT goal had been previously achieved. As of October 2025, 280 elevators have already been transferred to third-party management through the PACT Section 8 conversion program*

<u>Pests</u>

Goal: Pest Population Reduction

Objective: By year five, NYCHA shall achieve a 75% reduction of rat population inside apartments, and 70% reductions of bedbugs, mice, and roaches inside apartments.

- ***Progress****: In 2025, the Monitor and NYCHA agreed to a protocol that calculates estimates for each pest type. As of the end of Year 7 (February 2025 – January 2026), NYCHA had achieved a 31% reduction in rats, 58% reduction in mice, 69% reduction in roaches and 80% reduction in bedbugs.*

Goal: Improved Response to Resident Complaints

Objective: By January 31, 2021, NYCHA will:

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

- ***Progress:*** *As of April 2026, 98% of interior rat complaints were responded to within two business days and 98% within five calendar days.*

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

- ***Progress:*** *As of April 2026, 97% of mice, roach and bedbug pest complaints in apartments were responded to within seven days and 99% were responded to within 10 calendar days.*

c) Apply effective pest control methods (in compliance with applicable law, including the Federal Insecticide, Fungicide, and Rodenticide Act, 7 U.S.C. § 136 *et seq*.), to address any verified complaints within seven days.

- ***Progress****: As of April 2026, 95% of work orders were completed within seven days from the time an exterminator confirms the infestation to treatment.*

Goal: Implementation of IPM Practices

Objective: The HUD Agreement requires NYCHA to consistently and comprehensively implement IPM practices. This includes timely pest treatment and deploying training to the pest management team.

Progress*: In September 2025, the federal monitor, for the first time, reported that NYCHA had satisfied the HUD Agreement requirement that it send staff appropriately trained on Integrated Pest Management ("IPM") to respond to any pest complaint. NYCHA has created training programs and materials that are IPM-compliant and ensures the appropriate staff receive those trainings. These trainings ensure that NYCHA exterminators plug holes, use HEPA vacuums to remove roach residuals, seal cracks, and educate residents with fliers about how to keep their homes pest free. By adding these additional duties, exterminators will identify and address the root cause of an infestation, which will reduce repeat infestations in the future.*

Goal: Other Pest Obligations

a) NYCHA will install 50 rat slabs by December 31, 2020.
Progress: *All 50 rat slabs have been installed.*

Annual Inspections

Goal: Conduct Annual Inspections

Objective: NYCHA will conduct 100% of annual apartment inspections of developments.

- ***Progress:*** *In 2025, NYCHA completed approximately 95% of apartment inspections. In calendar year 2026 (as of May), NYCHA has completed 94,327 (69%) apartment inspections.*

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

Progress: *NYCHA's Maintenance Workers and vendors closed thousands of repair work orders during annual inspections, as shown by records in Maximo, NYCHA's asset management software. NYCHA also codified this practice, including a list of minor repairs required to be conducted during an annual inspection, in its Standard Procedure for Periodic Apartment Inspections.*

During calendar year 2025, NYCHA's Maintenance Workers and vendors continue to conduct apartment inspections and perform minor repairs in the unit while conducting the inspection. A total of 22, 238 inspections with minor repairs were performed. For the 2026 inspection cycle (as of May 2026), 15,314 apartment inspections had minor repairs performed.

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

- ***Progress:*** *The Monitor transmitted an Action Plan for annual inspections, which is available via the following link: https://www1.nyc.gov/assets/nycha/downloads/pdf/Annual_Inspection_Action_Plan_Final_12.9.2020.pdf.*

- *NYCHA submitted amended drafts of the Action Plans for NSPIRE and Annual Apartment Inspections to the Monitor in May 2024 to reflect NSPIRE requirements and other updates. The Phase II Annual Inspections Action Plan was finalized in Q2 2025. After several iterations, as of May 2026, NYCHA is awaiting additional information from HUD and the Monitor's review to finalize Phase II NSPIRE Action Plan.*

Organizational and Operational Initiatives

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

- ***Progress:*** *NYCHA's Learning & Development Department continues to monitor and advise departments on certification requirements, particularly for lead-based paint and, in coordination with NYCHA's Compliance Department, HUD inspections.*

  As of May 15, 2026, 4,716 employees completed the Initial Renovator Lead Renovation, Repair, and Painting (RRP) Training (8 hours). NYCHA has also rolled out a 3-hour RRP refresher training. As of May 15, 2026, 1,334 employees have completed the 3-hour RRP refresher training, and 1,313 employees have completed the virtual Lead Disclosure Rule Training.

  As mandated by the HUD Agreement, the Compliance Department managed the PHAS UPCS Deceptive Practices training which commenced in October 2019.

  Please note that in April 2023, HUD replaced the Uniform Physical Conditions Standards (UPCS) with the National Standards for the Physical Inspection of Real Estate (NSPIRE) for public housing. As a result, all PHAS UPCS Deceptive Practices Training was suspended in April 2023, replaced by the newly designed NSPIRE Readiness Training, which was launched in October 2023. NSPIRE Readiness Training focuses on Property Management staff involved in any aspect of performing physical inspections, maintenance, and/or repairs at a NYCHA development.

  NSPIRE Readiness Training has two components: a two-day classroom training conducted at NYCHA's Training Center and a half-day site-based training conducted in a NYCHA apartment. As of May 15, 2026, 2,335 staff completed classroom training and 1,663 staff completed site-based training.

Section B: Real Estate Development Activities

Goal: Permanent Affordability Commitment Together (PACT)

Objective: NYCHA's 2023 Physical Needs Assessment (PNA) estimates 20-year physical needs of $78.3 billion, which is a 73 percent increase from the 2017 PNA's total estimated needs of $45.3 billion. As part of its Permanent Affordability Commitment Together (PACT) initiative, NYCHA will address overdue repairs in 62,000 apartments – a third of its units and home to approximately 140,000 New Yorkers.

Progress: Through PACT, over $3 billion in renovations have been completed at more than 15,000 apartments. An additional 16,859 apartments are under construction, totaling over $6.9 billion in major upgrades. An additional 13,538 apartments are part of active development projects in the process of resident engagement or pre-development. In sum, NYCHA has over 45,000 apartments completed, in construction, or in a stage of resident engagement or pre-development.

Commitments to Build New 100% Affordable Housing

New York City is confronting an affordable housing crisis, and New Yorkers have called for more affordable housing. NYCHA has pledged to provide underused land (such as parking lots and storage spaces) for the creation of new, affordable apartments for both families and seniors.

NYCHA has closed on 19 transactions located in the Bronx, Brooklyn, Manhattan, and Queens. To date, 2,623 affordable apartments have been built or are under construction. An additional 72 co-op homeownership units began construction at the end of 2020 and welcomed home first-time home buyers in 2024. All units have been leased.

Sol on Park Senior, Bronx (Morris)

In 2022, NYCHA leased a parcel of approximately 13,000 square feet on Block 2902, Lot 36, for construction of a 229-unit senior affordable housing development. NYCHA issued an RFP in collaboration with HPD in 2019 and designated a partner team in 2023.

Kingsborough Senior, Brooklyn (Kingsborough)

NYCHA intends to lease a parcel of approximately 18,000 square feet on Block 1344, Lots 1 and 175 for construction of a 244-unit senior affordable housing development. NYCHA issued an RFP in collaboration with HPD in 2019 and pre-development is ongoing.

53-05 Beach Channel Drive, Queens (Ocean Bay Apartments - Oceanside)

NYCHA intends to lease a parcel of approximately 37,000 square feet on Quens Block 15890, Lots 54, 55, 58, 62, 64, 66, and 69 for construction of a 105-unit affordable housing development. NYCHA issued an RFP in 2014 and pre-development is ongoing.

Sale of development Air Rights

NYCHA continues to tap into its extensive unused development rights, known as "air rights," in order to raise revenue for the Authority. By transferring a portion of the Authority's approximately 80 million square feet of air rights, NYCHA expects to generate funding for capital repairs for adjacent apartments. The sale of unused transferable development rights to owners of privately owned sites has already generated $55 million in revenue to pay for capital repairs at NYCHA developments.

Campos Plaza, Manhattan

In June 2024, NYCHA completed closed on an agreement to transfer 100,000 square feet of development rights to an adjacent private property owner. The transaction generated $19 million in funding, which will be used exclusively at Campos Plaza II for comprehensive building repairs and upgrades to be implemented through NYCHA's PACT program.

Howard, Brooklyn

In 2025, NYCHA leveraged a tool called Transfer of Assistance to offer new apartments to NYCHA residents in a residential building to be constructed at Howard Houses in Brooklyn. In exchange for the air rights and the small parcel of land, the development team will reserve eight units for Howard Houses residents who are interested in moving to the new building once constructed. Additionally, at least eleven apartments will be available to NYCHA residents citywide. Through Transfer of Assistance, eligible Howard households and NYCHA households will have the opportunity to apply for a subset of these units, and if selected, transfer directly into the new building through the Project-Based Section 8 program.

Section C: NYC Public Housing Preservation Trust

In June 2022, the State legislature passed a bill establishing the New York City Public Housing Preservation Trust (the Trust), and it was signed into law by Governor Kathy Hochul. Under current state law, NYCHA can transfer a maximum of 25,000 apartments to the Trust to dramatically improve residents' quality of life through comprehensive building renovations while preserving their rights and protections (including permanently affordable rent) and providing economic opportunities. NYCHA will continue to own and manage the properties, entering into a long-term ground lease with the Trust to secure Project-Based Section 8 vouchers, which have a subsidy worth more than NYCHA's current federal Section 9 subsidy. Similar to how other government entities raise funding for capital improvements, the Trust will pursue conventional financing or bonds that fund comprehensive building renovations.

Since 2023, resident votes have taken place at several developments following extensive engagement periods that include outreach, education, and opportunities for residents to ask questions and provide feedback. Transfers to the Trust only occur following a resident vote, where households choose between joining the Trust, converting through the Permanent Affordability Commitment Together (PACT) program, or remaining in the Section 9 program. Voting is conducted through a secure, third-party administrator and includes multiple methods of participation, including mail, online, and in-person voting.

Residents from Nostrand Houses, Bronx River Addition, Unity Towers (also known as Coney Island (Site 1B)), and Hylan Houses each voted to join the Trust following this process, representing the first cohort of developments to select the Trust model for comprehensive renovation. Residents at Coney Island Houses, Throggs Neck Addition, and Isaacs Houses voted to remain in the Section 9 program, while Randall-Balcom elected to convert through the PACT program. Additional resident votes are expected to continue at developments across the portfolio.

Following Trust selection, the developments have advanced into procurement for selection of design-build partners, after which projects move into design and construction, alongside implementation of the Section 8 lease conversion process.

Nostrand Houses
At Nostrand Houses, a design-build partner was selected in July 2025, and the project is advancing through the design phase in coordination with residents, the Trust, and NYCHA. The Section 8 lease signing process began in January 2026, following a Draft Trust Lease public comment period held in July–August 2025. Construction is anticipated to begin in Fall 2026 through a phased approach.

Bronx River Addition
At Bronx River Addition, a design-build partner was selected in September 2025, and the project is progressing through design. Construction is anticipated to start in late 2026. Additionally, a draft Trust Lease public comment period was held in July–August 2025, and the Trust and NYCHA are starting the Section 8 lease signing process in June 2026.

Unity Towers (also known as Coney Island I (Site 1B))
At Unity Towers, shortlisted firms were issued an RFP in October 2025, and proposals were due in

March 2026. The Trust selected a design-build partner in June 2026. The design-build team partner will start design and resident engagement in Summer 2026.

Additionally, a Draft Trust Lease public comment period was conducted in January–February 2026.

Hylan Houses
At Hylan Houses, shortlisted firms were issued an RFP in February 2026 and proposals were due in April. The Trust selected a design-build partner in May 2026. This project will be the first to use a progressive design-build (PDB) delivery approach, one of the delivery mechanisms available to the Trust to support efficient project delivery and early collaboration during design. The design-build team partner will start design and resident engagement in Summer 2026.

Additionally, a draft Trust Lease public comment period was conducted in January–February 2026.

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

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

Progress: *NYCHA has implemented a new, industry-standard software solution for vendors, known as eComply, to improve Section 3 compliance tracking. All contractors are now required to submit labor hours in eComply via certified payroll or hourly reports. All proposing vendors now submit Section 3 plans online at solicitation time. Beginning in the second quarter of 2026, NYCHA will conduct quarterly outreach to contractors with active contracts subject to Section 3 to enforce their responsibility to report labor hours and other Section 3 activity to NYCHA, and to monitor their progress in meeting Section 3 benchmarks. In 2024, NYCHA constituted a cross-departmental Section 3 Working Group which holds recurring meetings to discuss Section 3 compliance and initiatives to improve the process. The fully revised Section 3 Standard Procedure is expected to be finalized in 2026. In 2025, NYCHA introduced new data tools and other resources to all staff that manage contracts and vendors subject to Section 3 to improve compliance tracking across the entire organization.*

Section E: Additional Goals
Goal: Promote Equal Opportunity in Housing

- ***Progress****: NYCHA reaffirms its commitment to providing fair housing through its sustained relationships with residents, applicants, advocates, and organizations that assist people with employment and fair housing issues.*

  NYCHA's Management Services Department (MSD) and Services for People with Disabilities Unit (SPD) assist applicants and residents with disabilities obtain decent, affordable, and accessible housing in NYCHA developments. SPD serves as a liaison between the disabled community and NYCHA. In 2025, SPD responded to or assisted with 26 reasonable accommodation matters from residents, applicants, Section 8 voucher holders, and/or their

respective advocates. In 2025, SPD handled approximately 632 matters involving a range of services, including assistance with documentation, transfer requests, modifications, change of priority status, and reasonable accommodation requests for remediation of mold conditions in connection with asthma. SPD provided information to a variety of organizations, including New York Legal Services, ADAPT, Mayor's Office for People with Disabilities, and many others. Applicants, residents, and others in need of assistance with disability issues may call SPD's hotline at (212) 306-4652 or TTY at (212) 306-4845

- *NYCHA is committed to providing equal housing opportunities for all qualified residents and applicants. NYCHA strictly prohibits discrimination in the selection of residents or participation in any programs, services, or activities implemented by or on behalf of NYCHA. All residents and applicants are protected from discrimination based on the following categories, with two new categories added in November 2023 (height and weight):*

    - Race
    - Color
    - National Origin
    - Religion or Creed
    - Sex (including Gender Identity and Sexual Orientation)
    - Familial Status
    - Disability
    - Age
    - Immigration Status
    - Lawful Source of Income
    - Military Service
    - Pregnancy
    - Status as Victim of Domestic Violence, Sexual Harassment, Sexual Violence, or Stalking
    - Marital or Partnership Status
    - Presence of Children
    - Lawful Occupation
    - Height
    - Weight

- *Qualified residents, applicants, and Section 8 voucher holders may file housing discrimination or sexual harassment complaints against NYCHA employees or anyone working on behalf of NYCHA if they believe they have been discriminated or harassed related to any protected category listed above. NYCHA's Office of NYCHA's Office of EEO, Fair Housing, and Access Services' (EFAS) will investigate the allegations and determine appropriate recommendations or other remedial measures.*

- *EFAS conducts internal investigations of complaints of fair housing discrimination and sexual harassment filed by public housing residents and applicants for public housing.*

- *In 2025, EFAS received 16 fair housing complaints, nine of which were related to sexual harassment, two for disability-based discrimination, and one for multi-basis discrimination.*

Complaint Basis	2025
Sexual Harassment	9
Sexual Orientation	2
Disability	1
Race	1
Weight	1
Retaliation	1
Multi-basis	1
Total	**16**

The NYCHA Fair Housing Non-Discrimination Policy Statement is available on NYCHA's website at https://www1.nyc.gov/site/nycha/about/policies-procedures.page. EFAS regularly reviews and may provide updates to NYCHA's non-discrimination policies, including the NYCHA's Fair Housing Policy, Equal Employment Opportunity Policy, and Sexual Harassment Prevention Policy.

NYCHA's policy is to take reasonable steps to ensure Limited English Proficient (LEP) persons may effectively participate in, and benefit from, NYCHA programs and services.

NYCHA's Language Assistance Services Standard Procedure provides procedures and staff responsibilities to ensure NYCHA's language access policy is achieved. Specifically, the standard procedure addresses, among other things: procedures for identifying LEP individuals with the assistance of language identification cards; staff procedures and supervisor responsibilities for obtaining translation or interpretation services for LEP individuals; the posting of notices in public areas within development management offices, borough offices, and waiting rooms informing LEP individuals of no-cost language access services; training requirements to ensure awareness of and compliance with NYCHA's language access procedures; language access reporting and oversight responsibilities.

Access Resources

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

NYCHA relies on bilingual staff and vendors to provide language services, including telephonic, remote meeting, and in-person interpretation as well as paper, webpage, or other electronic document translations. In providing these services, NYCHA staff serve in different functions. First, bilingual staff may directly serve LEP individuals they or their departmental

colleagues encounter. Second, departments that frequently encounter LEP individuals (including the Customer Contact Center; EFAS; Office of Impartial Hearings; Operations/Public Housing Property Management; Leased Housing's Section 8 program; Resident Economic Empowerment & Sustainability; Resident Services, Partnerships, & Initiatives/Resident Partnership & Civic Engagement) assign a staff member to serve as the department language liaison. Liaisons serve as language access ambassadors for their department as well as identify vital documents requiring translation.
To supplement staff resources, NYCHA's language access vendors provide interpretation services as well as primary document translation. Through NYCHA staff and vendors, language services are available in well over 150 languages.

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

In 2025, LSU and a vendor handled 1,105 interpretation requests. LSU completed 3,133 translations requests comprising of 5,811 pages, with an additional 28 items handled through a vendor. LSU can provide interpretation services directly or transfer calls for interpretation requests to a Language Assistance Hotline, which is operated by an external language vendor that provides on-demand, over-the-phone interpretation services in more than 150 languages.

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

MyNYCHA
As of December 31, 2025, MyNYCHA has 141,744 registered users in English, 6,491 registered users in Spanish, 132 registered users in Russian, 540 registered users in Simplified Chinese, and 112 registered users in Traditional Chinese. NYCHA residents have used the MyNYCHA mobile app and website to file more than 3,271,146 tickets since its inception in 2015. In 2023, the MyNYCHA app was enhanced to include Russian and Chinese language options.

NYCHA Self-Service Portal
As of December 31, 2025, the Self-Service Portal has 209,989 public housing resident profiles and 223,447 Section 8 voucher holder profiles. In 2025, the Self-Service Portal was accessed in Spanish by 64,637 unique users, in Chinese Simplified by 9,154 unique users, Russian by 3,233 unique users and Chinese Traditional by 1,192 unique users.

Goal: Violence Against Women Act (VAWA)

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

- ***Progress:*** *From January 1, 2025, through December 31, 2025, the following cases were approved for transfer:*

VAWA Victim of Domestic Violence	468
VAWA Dating Violence	89
VAWA Sexual Assault (includes Child Sexual Victims)	18
VAWA Stalking	114
Intimidated Victim	238
Intimidated Witness	2
Victim of Traumatic Incident	0
Total	**929**

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

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

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

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

3. OTHER INFORMATION

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board Recommendations

1. Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
☐ Yes ☐ No:

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
☐ Attached
☐ Provided below:

3. In what manner did the PHA address those comments? (select all that apply)
☐ Considered comments but determined that no changes to the PHA Plan were necessary.
☐ The PHA changed portions of the PHA Plan in response to comments. List changes below:
☐ Other: (list below)

B. Description of Election process for Residents on the PHA Board

NYCHA's resident Board members are not elected. As per N.Y. Public Housing Law § 402(3), the City's Mayor appoints all seven Board members, including the three resident Board members.

C. Statement of Consistency with the Consolidated Plan

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction: (provide name here) *New York City*

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
☐ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
☐ Other: (list below)

3. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

The City of New York's Consolidated Plan serves as the City's official application for the four U.S. Department of Housing and Urban Development (HUD) Office of Community Planning and Development entitlement programs. The Consolidated Plan includes an Action Plan, which includes two elements: 1) the description of the use of federal, state, city, private and nonprofit funding for

housing, homeless assistance and prevention, supportive housing services, and community development activities; and 2) the Supportive Housing Continuum of Care for Homeless and Other Special Needs Populations, which describes the City's coordination of supportive housing services to the homeless and other special needs populations. The Public Housing Agency Plan embodies, in many respects, the concepts of HUD's Consolidated Plan. The Agency Plan provides a planning mechanism by which a housing authority can examine its long-term and short-term needs, specifically the needs of the families it serves, and design both long-term strategies and short-term strategies for addressing those needs. Like the Consolidated Plan, the Agency Plan involves consultation with affected groups in the Plan's development.

D. Additional Information

Second Replacement Housing Factor ("RHF") Funding Groups

1) ***Second RHF Funding Group – First Increment RHF Plan***

- NYCHA has obligated and expended all of grant NY36R005501-08 ($853,997), NY36R005501-09 ($790,086), NY36R005501-10 ($776,218) and NY36R005501-11 ($395,955) for construction of public housing units in the Randolph South Mixed-Finance transaction.

- NYCHA has obligated and expended all of grants NY36R005501-12 ($1,538,254), NY36R005501-13 ($1,280,356) and NY36R005501-14 ($1,475,995) for Phase I of the Prospect Plaza HOPE VI Revitalization Project.

- NYCHA has transferred the entire NY36R005501-16 ($692,021) grant for RAD rent boost.

- NYCHA has expended all of grant Y36R005501-15 ($987,856) grant toward modernization work by the September 22,2023 deadline.

2) ***Second RHF Funding Group – Second Increment RHF Plan***

- NYCHA has expended all grants NY36R005502-10 ($258,796), NY36R005502-11 ($333,158), NY36R005502-12 ($496,383), NY36R005502-13 ($646,103) and NY36R005502-14 ($743,900) for construction of public housing units in Phase II of the Prospect Plaza HOPE VI Revitalization Project.

- NYCHA has expended all the NY36R005502-15 ($759,649), NY36R005502-16 ($131,670) and NY36R005502-17 ($234,795) grants by the deadline.

ATTACHMENT F
Admissions Policy for Deconcentration

HUD regulations (24 CFR Part 903) require a discussion of HUD's Deconcentration Requirement in NYCHA's FY 2027 Annual Plan. It was determined from the following Deconcentration Analysis that NYCHA does not need to develop an additional Deconcentration Plan for its Fiscal Year 2027 Annual Plan to comply with HUD's requirement.

Although 7 of NYCHA's qualifying 109 consolidated developments fall outside of an Established Income Range (EIR), NYCHA is exempt from developing an additional Deconcentration Plan to bring the 7 developments within the EIR primarily because all of NYCHA's developments are part of an explicit strategy to promote income mixing in each of its developments. This strategy is detailed in the Income Mixing Plan of NYCHA's ACOP, and therefore, NYCHA already has a deconcentration plan built into its rental scheme.

Deconcentration Analysis

The HUD regulations at Part 903.2 (b) note that the deconcentration requirements apply to general occupancy, family public housing developments, but specifically excludes from its applications the following types of developments within a PHA:

- Public housing developments operated by a PHA with fewer than 100 public housing units;
- Public housing developments operated by a PHA which house only elderly persons or persons with disabilities, or both;
- Public housing developments operated by a PHA which consist of only one general occupancy, family public housing development;
- Public housing developments approved for demolition or for conversion to tenant-based assistance; and
- Public housing developments which include public housing units operated in accordance with a HUD-approved mixed-finance plan using HOPE VI or public housing funds awarded before the effective date of this rule, provided that the PHA certifies (and includes reasons for the certification) as part of its PHA Plan (which may be accomplished either in the annual Plan submission or as a significant amendment to its PHA Plan) that exemption from the regulation is necessary to honor an existing contractual agreement or be consistent with a mixed finance plan, including provisions regarding the incomes of public housing residents to be admitted to that development, which has been developed in consultation with residents with rights to live at the affected development and other interested persons.

In order to calculate the average income of all families in NYCHA's covered developments and the average income by covered development, the developments' characteristics and tenant income data were compiled from NYCHA's Tenant Data System database as of January 1, 2026. This database contains household-level data for every occupied unit within NYCHA developments.

Of the 135,570 occupied units[27], there are 119,807 units within 109 consolidated developments[28] that do not meet the exemption criteria and therefore were used in this analysis. Gross average incomes from the excluded types of developments and units were not used in the calculation of the overall NYCHA average income. In total, 15,763 occupied units were excluded from the analysis. See the Appendix for a list of the individual excluded developments.

As per the §903.2(c)(1)(iii), a PHA shall determine whether each of its covered developments falls above, within or below the Established Income Range (EIR). The EIR is from 85 to 115 percent (inclusive) of the average family income (the PHA-wide average income for covered developments), except that the upper limit shall never be less than the income at which a family would be defined as an extremely low-income family under 24 CFR 5.603(b).

A NYCHA development will be considered below the EIR if its average gross household income[29] is less than 85% of the NYCHA average; and a development will be considered above the EIR if its average gross household income is above 115% of the NYCHA average. The 2026 NYCHA average gross household income is $27,203, resulting in a lower EIR limit of $23,123 and an upper EIR limit of $31,283.

The extremely low-income family limit (30% of the 2025 HUD area median income for the New York City HUD FMR Area) is $30,900. Since this is not more than 115% of the NYCHA average gross household income ($31,194), NYCHA's 2026 upper EIR limit is $31,283.

Table I shows that out of the 109 consolidated NYCHA developments that are not exempt from the application of the Deconcentration Rule, there are 2 developments with 1,593 occupied units with gross average household incomes below the EIR and 5 developments with 3,640 units with gross average household incomes above the EIR.

TABLE I
Summary Table

	Lower Income Developments Average Incomes <$23,123		Higher Income Developments Average Incomes >$31,283		Total	
Development Category	**Developments**	**Occupied Dwelling Units**	**Developments**	**Occupied Dwelling Units**	**Developments**	**Occupied Dwelling Units**
Non-exempt NYCHA Developments	2	1,593	5	3,640	109	119,807

[27] There are 135,570 public housing households as of January 1, 2026.

[28] For the purposes of this analysis, there are 109 consolidated developments that have units that are not exempt from the application of the Deconcentration Rule. However, there may be units within these 109 consolidated developments that have been excluded.

[29] Average gross household income is defined as total household income before deductions.

TABLE II
LOWER INCOME DEVELOPMENTS

Table II lists the 2 consolidated developments with an average gross household income of less than 85 percent ($23,123) of the NYCHA average of $27,203.

Borough	Development Name	TDS #	Average Gross Income	Occupied Dwelling Units
Brooklyn	Howard*	072	$21,581	778
Queens	Hammel	075	$22,085	815
		Total	**$21,838**	**1,593**

Note: Howard will convert to the PACT program in the future.

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

TABLE III
HIGHER INCOME DEVELOPMENTS

Table III lists the 5 consolidated developments with an average gross household income greater than 115 percent ($31,283) of the NYCHA average of $27,203.

Borough	Development Name	TDS #	Average Gross Income	Occupied Dwelling Units
Brooklyn	Garvey	252	$32,315	316
Brooklyn	Gowanus	025	$32,350	1,043
Manhattan	Fulton*	136	$34,069	854
Manhattan	Wilson*	112	$34,298	372
Queens	Astoria	026	$32,595	1,055
		Total	**$33,022**	**3,640**

Note: Fulton and Wilson will convert to the PACT program in the future.

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

As per §903.2(c)(1)(iv), a PHA with covered developments having average incomes outside the EIR may explain or justify the income profile for these developments as being consistent with and furthering two sets of goals: the goals of deconcentration of poverty and income mixing as specified

by the statute (bringing higher income tenants into lower income developments and vice versa); and the local goals and strategies contained in the PHA Annual Plan. Elements of explanations or justifications that may satisfy these requirements may include, but shall not be limited to the following:

- The covered development or developments are subject to consent decrees or other resident selection and admission plans mandated by court action;
- The covered development or developments are part of PHA's programs, strategies or activities specifically authorized by statute, such as mixed-income or mixed-finance developments, homeownership programs, self-sufficiency strategies, or other strategies designed to deconcentrate poverty, promote income mixing in public housing, increase the incomes of public housing residents, or the income mix is otherwise subject to individual review and approval by HUD;
- The covered development's or developments' size, location, and/or configuration promote income deconcentration, such as scattered site or small developments;
- The income characteristics of the covered development or developments are sufficiently explained by other circumstances.

All 7 NYCHA developments that have average gross incomes outside of the EIR from the Deconcentration Requirement should be excluded, because all NYCHA developments are part of NYCHA's explicit strategy to promote income-mixing in each of its developments. That strategy is spelled out in NYCHA's Tenant Selection and Assignment Plan (TSAP). Under the TSAP, each development must adhere to income-mix requirements each year, renting no less than 40% of its vacancies to Very Low-Income Families (making 30% or less of area median income), but balancing that with the Working Family Preference, which gives priorities to higher-income and working families.[30] This plan has been in place since 1998. Over time, it should produce a generally uniform and healthy income mix in all NYCHA developments. Since NYCHA already has this deconcentration plan built into its rental scheme, it need not do anything more to comply with the Deconcentration Requirement. NYCHA has chosen, however, to be more aggressive in addressing the income mix at the Lower Income Developments. It has therefore targeted its Economic Integration Plan to those developments.

HUD regulations at §903.2(c)(2) note that HUD will consider a PHA to be in compliance with the this subpart if:

- The PHA's income analysis shows that the PHA has no general occupancy family developments to which the deconcentration requirements apply; that is, the average incomes of all covered developments are within the Established Income Range;
- The PHA has covered developments with average incomes above or below the Established Income Range and the PHA provides a sufficient explanation in its Annual Plan that supports that the income mix of such development or developments is consistent with and furthers the goal of deconcentration of poverty and income mixing and also the locally determined goals

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

of the PHA's Annual and Five Year Plans, and the PHA therefore need not take further action to deconcentrate poverty and mix incomes; or

- The PHA's deconcentration policy provides specific strategies the PHA will take that can be expected to promote deconcentration of poverty and income mixing in developments with average incomes outside of the Established Income Range

As explained in the previous page, NYCHA can justify all the developments outside the EIR, because they are all part of the TSAP income-mix rental scheme. NYCHA's TSAP rental scheme already constitutes a sufficient deconcentration plan explicitly designed to achieve a uniform and healthy income mix in each development. However, NYCHA has chosen to be more aggressive in addressing the income mix at Lower Income Developments and has targeted its Economic Integration Plan to those developments. The Economic Integration Plan includes the following element:

- Applications Outreach to Tier III and Tier II applicants with incomes exceeding the "non-elderly average," informing them that they may be selected sooner for an eligibility interview if they are willing to accept one of the Working Family Priority Consolidations.

APPENDIX - Individual NYCHA Developments Exempt from Deconcentration Rule

Homeownership Developments

- FHA Homes

Developments with Fewer than 100 Units

- Bronx
  - 1162-1176 Washington Avenue
  - 1471 Watson Avenue
  - Boynton Avenue Rehab
  - Bryant Avenue-East 174th Street
  - Hoe Avenue-East 173rd Street
  - Longfellow Avenue Rehab
  - PSS Grandparent Family Apartments
  - Teller Avenue-East 166th Street
  - West Farms Square Conventional

- Brooklyn
  - East New York City Line

- Manhattan
  - 154 West 84th Street
  - Lower East Side III
  - Lower East Side Rehab (Group 5)
  - Rehab Program (Wise Rehab)
  - Stanton Street
  - WSUR (Site A) 120 West 94th Street

Developments Designated for the Elderly Only

- Bronx
    - Bronx River Addition
    - College Avenue-East 165th Street
    - Glebe Avenue-Westchester Avenue
    - Randall Avenue-Balcom Avenue
    - West Tremont Avenue-Sedgwick Avenue Area

- Brooklyn
    - Brown
    - Haber
    - Kingsborough Extension
    - Van Dyke II
    - Vandalia Avenue
    - Woodson

- Manhattan
    - Baruch Houses Addition
    - Chelsea Addition
    - La Guardia Addition
    - Meltzer Tower
    - Robbins Plaza
    - Thomas Apartments

- Queens
    - Conlon LIHFE Tower
    - International Tower
    - Leavitt Street-34th Avenue
    - Rehab Program (College Point)
    - Shelton House

- Staten Island
    - Cassidy-Lafayette
    - New Lane Area

Mixed-Finance Developments

- Bronx
    - Castle Hill
    - Marble Hill
    - Saint Mary's Park

- Brooklyn
    - Bushwick
    - Marlboro

- Manhattan
    - Amsterdam Addition
    - Chelsea

    - Drew-Hamilton
    - Rutgers

- Staten Island
    - Stapleton

The following development converted to the PACT program and are excluded from the Deconcentration Analysis.

- Manhattan
    - Campos Plaza II (converted in February 2026)

- Bronx
    - East 152nd Street-Courtlandt Avenue (converted in May 2026)
    - Moore (converted in May 2026)

ATTACHMENT G
Community Service Description of Implementation

NEW YORK CITY HOUSING AUTHORITY
Community Service Policy Overview

According to requirements of Federal Law, all public housing residents who are not exempt must perform Community Service or Economic Self-Sufficiency activities for 8 hours each month as a condition of tenancy. This Community Service Policy Overview explains the exemptions and describes the Community Service requirement. During the Annual Review process the Authority will advise families of their Community Service status.

NYCHA has developed strategies to provide additional assistance to help residents comply with this mandate including:

1. Trying to increase the opportunities available through resident association-driven activities to fulfill this requirement.
2. Providing additional information to residents using letters, posters, and Journal articles as well as the NYCHA website (including NYCHA activities that can be used for Community Service and links to other websites where eligible activities can be found).
3. Making it easier to document service by working with resident associations to provide receipts for community service hours at suitable events/activities.
4. Updating the community service procedure: community service forms are now requested, reviewed, generated and digitally stored in NYCHA's database system. This allows increased transparency and improved reporting metrics for NYCHA due to the ability to monitor the specific community service hours completed and owed, as well as the different exemptions and credits for residents.
5. Reports have been created that allow NYCHA to monitor resident compliance with the community service requirement.
6. NYCHA residents now have the option of mailing completed community service forms and applicable supporting documents directly to the NYCHA central imaging unit or submitting them to their property management office. Staff will mail to the central imaging unit on their behalf.
7. Property management staff was trained on the updated community service procedure and community service forms. This will enable staff to inform and assist residents with the community service updates.
8. NYCHA will also complete systems enhancements that will allow NYCHA residents to request and submit community service forms via NYCHA's Self-Service Portal. This will allow residents to submit and request community service forms at any time.

For those required to perform Community Service, successful documentation of the needed hours is a condition of tenancy and failure to perform this service can result in termination of tenancy.

I. EXEMPTIONS FROM COMMUNITY SERVICE

An exemption will excuse the resident from the performance of Community Service during the tenant's one-year lease term, unless the exemption is permanent. Some exemptions can be

identified by NYCHA using information in the Annual Review or resident file. Others may be granted only after residents submit documentation. Forms and information are available from property management staff. When documentation is required for an exemption, all forms must be filled out and signed and returned to the development property management office.

A. Exemptions NYCHA identifies - no additional documents needed

1. **Age -** Below Age 18.
2. **Age -** Age 60 and older (permanent exemption).
3. **Employed -** An adult with no child below age 13 in the household and earning at least $21,060 per year or working a minimum of 30 hours per week.
4. **Employed -** A single-adult family with at least one child below age 13 in the household and earning at least $14,040 per year or working a minimum of 20 hours per week.
5. **Employed -** A two-adult family with at least one child below age 13 in the household: either or both adults must work and must earn at least $24,570 per year, or either or both together must work a minimum of 35 hours per week, on average.
6. **Disability Income -** Receiving Supplemental Security Income (SSI).
7. **Public Assistance -** All authorized family members living in the same apartment will be exempt from performing community service for one year if at least one family member receives welfare assistance or participates in a program that receives welfare monies and is in compliance with the rules of the program *(This exemption may require signed documentation).*

B. Other exemptions - granted only with supporting documentation

8. **Blind/Disabled** (certification by a doctor is required).
9. **Receiving Social Security Disability** (SSD) Income.
10. **Primary caretaker for the blind or disabled.**
11. **Vocational educational training** (available only **one** time per resident).
12. **Job skills training** directly related to employment, including attendance in a trade school. (The resident might not be currently employed, but employment may be dependent on successful completion of job training).
13. **Education directly related to employment**, in the case of an individual who has not received a high school diploma or a certificate of high school equivalency, if employment is dependent on successful completion of job training.
14. **Satisfactory attendance at secondary school** or higher.
15. **Satisfactory attendance in a course of study** leading to a certificate of general equivalence, if the resident has not completed secondary school or received such a certificate.
16. **Work experience** (including work associated with the refurbishment of publicly assisted housing) if sufficient private-sector employment is not available, e.g., Youthbuild.
17. **On-the-job** training.
18. **Childcare provider** to a NYCHA child resident age 5 or younger (including your own child), if the child's parent - also a NYCHA resident:
    - Is performing Community Service, OR
    - Is exempt by NYCHA from performing Community Service because the parent is employed;
    - Childcare provider to a child age 6 through 12 may qualify if the child does not attend school due to home schooling, home instruction, or is exempted by a school from attending for that year.

II. COMMUNITY SERVICE CREDITS

The following are CREDITS that reduce or eliminate the number of community service hours that a resident must perform in one year. These credits apply to the following special circumstances or activity. Note that the maximum number of hours that any resident must perform in one year is 96 hours (8 hours per month). One credit is equal to one hour of community service performed.

1. **Resident Association (RA) Officer**: A RA President, RA executive board members or Citywide Council of Presidents receive a credit of 8 hours of community service during any month in which they serve in office.
2. **Foster Parent**: A foster parent whose foster child(ren) lives in the same NYCHA apartment receives a credit of 8 hours of community service for every 30 days that the foster care relationship continues. Even if there is more than one foster child in the apartment, the credit remains at 8 hours per 30 days.
3. **Job Search and Job Readiness Assistance:** The resident is credited with **16** hours of community service (and not more than 16) for any job search activities during any lease year. This is **not** an Exemption although verified on the *Community Service Exemption Verification – Education Job Training* form.

Job readiness assistance includes any of the following criteria:

- Training in job-seeking skills;
- Training in the preparation of resumes or job applications;
- Training in interviewing skills;
- Participating in a job club;
- Other related activities that may assist an individual to secure employment;
- Receipt of Unemployment Insurance Benefits qualifies as job search.

4. **Military Service**: Any resident performing military service who is either on Active Duty (in the: Army, Air Force, Navy, Marine Corps or Coast Guard) or in a Reserve Component (in the: Army National Guard, Air National Guard, Army Reserve, Air Force Reserve, Navy Reserve, Marine Corps Reserve or Coast Guard Reserve) receives a credit of 96 hours of Community Service.
5. **Temporary illness:** A resident who is ill and unable to work shall receive a credit of 8 hours for every 30 days of illness.
6. **Victims of Domestic Violence, Intimidated Victims, and Intimidated Witnesses (VDV/IV/IW)**: A resident whose request to transfer to another development as a VDV/IV/IW has been approved, receives a credit of 8 hours of community service for every 30 days that the transfer request is pending, or until the resident moves out of the apartment.
7. **Incarceration**: A resident shall be credited for 8 hours of community service for every 30 days during his/her incarceration. Upon release from jail, the resident is required to perform community service, unless otherwise exempt.

III. COMMUNITY SERVICE REQUIREMENT

Residents who are not exempt must perform Community Service or Economic Self-Sufficiency activities at the rate of 8 hours per month. These hours may be performed flexibly. It is acceptable to perform less than 8 hours during any month if those hours are made up during another month. The resident **must**, however, be in compliance with the full number of hours at the annual review period, as reported on the Status Notice.

1. **Service Status Notice:** If the Service Status on the Status Notice for any household member is "Community Service Required," the resident has to submit the Community Service

Performance Log or Community Service Requirement Exemption Request form within 30 days of the date of the Status Notice. If NYCHA does not receive the Community Service Performance Log or Community Service Requirement Exemption Request within 60 days from the date the forms are sent, the resident will be mailed the Determination of Non-Compliance/Workout Agreement. If the Determination of Non-Compliance/Workout Agreement is not received within 30 days from the date it is sent, NYCHA will initiate termination proceedings against the tenant.

2. **Performance of Community Service:** Residents may perform Community Service either at a facility located within a NYCHA development or a non-NYCHA facility. There are a wide range of providers that residents may choose from who offer many different types of Community Service-eligible activities. A resident may, but does not have to, perform all Community Service activities with one provider. The resident may perform a variety of Community Service or Economic Self-Sufficiency activities.

NOTICE	NYCHA does not endorse any particular organization or assume any liability in connection with a resident's Community Service. Each resident is solely responsible for seeking an appropriate organization to fulfill this federal law requirement.

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

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

Community Service is defined by the law as: the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. Community Service is not employment and may not include political activities.

Examples of where to find Qualifying Community Service Activities

Residents may volunteer to perform Community Service with NYCHA or any federal, state or municipal agency, or for any community or faith-based organization. Residents can visit their Property Management Office or access volunteer opportunities through the following:

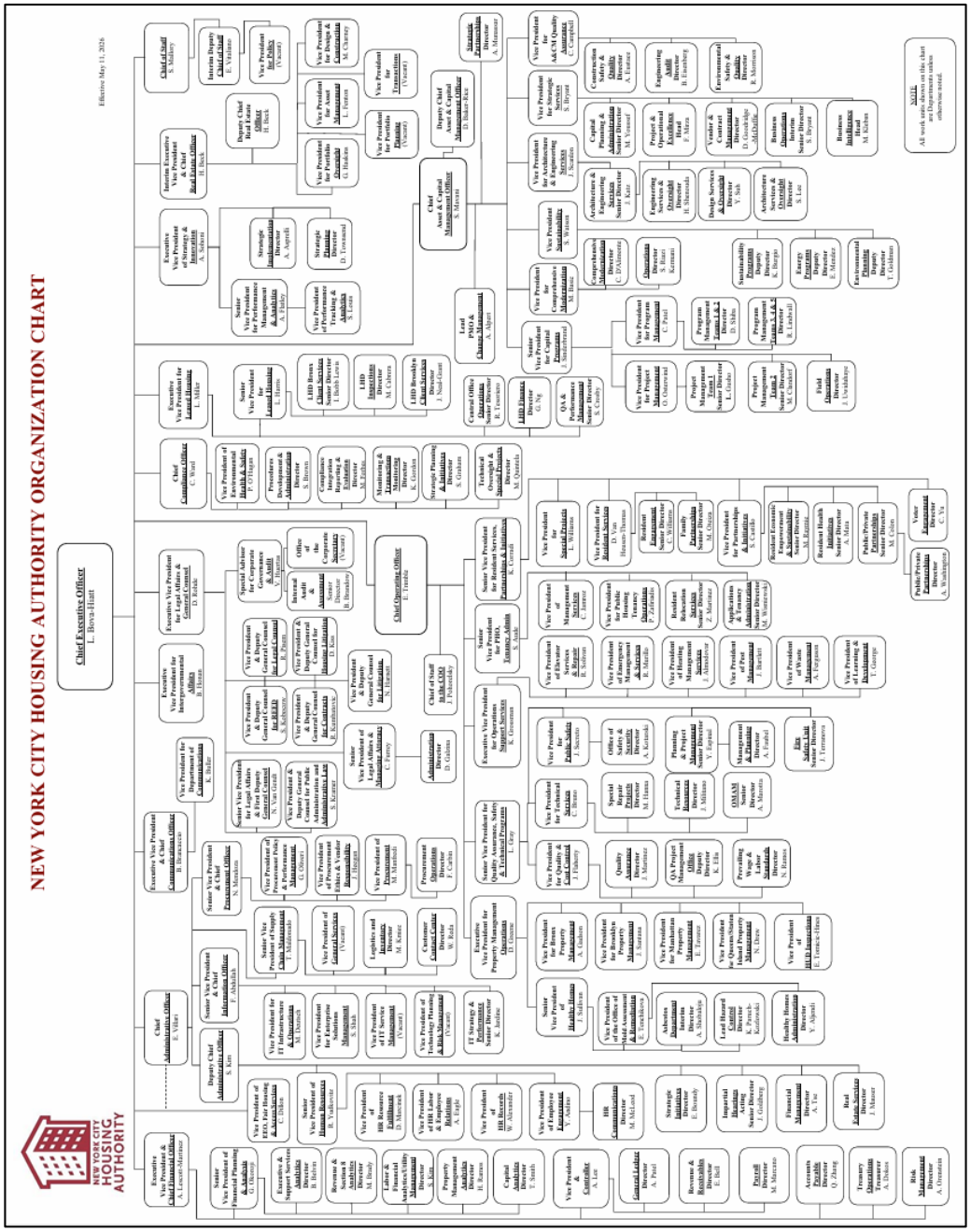
- NYC Service – Located on the internet at www.nycservice.org
- By calling **3-1-1** the NYC Citizen Service Center
- The **Volunteer Match** database located on the internet at www.volunteermatch.org

Residents can also perform service for groups not listed above. If there is any question about whether the service can be credited as Community Service, it is advised that residents ask their Property Management Office.

Examples of NYCHA Community Service Activities		
Resident Watch ▪ Resident Green Committees (RGC) ▪ Attendance at Resident Association meetings ▪ Delegate/Alternate at RAB meetings		▪ Community Center/Senior Center volunteer ▪ Help at resident sponsored community clean-up days ▪ Attending meetings called by NYCHA
Examples of Non-NYCHA Community Service Activities **Volunteer for local government, community, or faith-based organizations that serve a public benefit**		
▪ Food Bank ▪ Hospital ▪ Nursing Home/Hospice ▪ Ambulance service ▪ Programs providing support to families with hospitalized members ▪ Parks Department ▪ Library ▪ Reading Program ▪ Parent Teacher Association (PTA) meetings		▪ School ▪ After School Programs ▪ Day Care Facility ▪ Habitat for Humanity ▪ Boys or Girls Club ▪ AmeriCorps ▪ Police Department ▪ Auxiliary Police ▪ Youth Mentoring ▪ Vista ▪ Court ordered Community Service
Economic Self-Sufficiency is defined by the law as: any program that is designed to encourage, assist, train or facilitate the economic independence of its participants and their families. An *Economic Self-Sufficiency* program can also provide work for its participants.		
Examples of Qualifying Economic Self-Sufficiency Activities		
▪ Any REES or RES program [1] ▪ Work placement ▪ Apprenticeship ▪ Any program necessary to prepare a participant for work (including substance abuse or mental health treatment programs)		▪ Employment counseling ▪ Basic skills training ▪ English proficiency ▪ Workfare ▪ Financial management ▪ Household budgeting or management

[1] REES is NYCHA's Office of Resident Economic Empowerment and Sustainability

ATTACHMENT H
PHA Management Organizational Chart



ATTACHMENT I
Assessment of Site-Based Waiting List
Development Demographic Changes

Stanton Street (NY005013590)

Stanton Street is a 13-unit public housing development located at 189-191 Stanton Street, in lower Manhattan. The development is designated to serve a special needs population involving persons with acute immunological disorders of a degenerative nature or other disabilities or medical conditions requiring a high level of physical and supportive service accommodations, including homeless persons. NYCHA administers a site-based waiting list for this development. As approved by HUD, the first priority for these apartments is given to applicant referrals from designated public and private social service agencies for Stanton Street who are homeless. The second priority is given to NYCHA residents who were originally referred by designated public and private social service agencies for Stanton Street.

Based on the data available on January 1, 2026, Stanton Street housed 13 families having the following racial/ethnic characteristics. There were no changes found in the race/ethnic characteristics for these families. There were 3 heads of households reporting having a disability.

White	*Black*	*Hispanic*	*Other*
0	4	9	0

ATTACHMENT J

Smoke Free Housing Statement

The U.S. Department of Housing and Urban Development (HUD) required all public housing authorities to have a smoke-free policy in place by July 30, 2018. The HUD regulations are intended to improve indoor air quality, benefit the health of public housing residents and staff, reduce the risk of fires, and lower overall maintenance costs.

NYCHA's smoke-free initiative, Smoke-Free NYCHA, promotes healthier homes for residents and healthier working environments for employees by reducing exposure to secondhand smoke and providing support to residents and employees who smoke and want to quit or cut back.

Smoking is the leading cause of preventable death in the U.S. Secondhand smoke increases the risk of asthma attacks, respiratory illness, stroke, heart disease, and lung cancer in nonsmoking adults and children. Children and seniors, nearly half of all NYCHA residents, are often impacted the most. Eliminating smoking indoors and close to buildings is the best way to protect people from exposure to secondhand smoke.

NYCHA prohibits smoking of tobacco and marijuana (or cannabis) inside public housing apartments, in all indoor common areas, and within twenty-five (25) feet from a NYCHA building. Smoking in these areas is a violation of the public housing lease.

The new policy took effect July 30, 2018, and was amended in 2022. Below is the section from the NYCHA resident lease:

> 12.dd. The Landlord has adopted a Smoke-Free Policy prohibiting tobacco and marijuana smoking in restricted areas. Smoking means inhaling, exhaling, burning or carrying any lighted or heated cigar, cigarette, little cigar, pipe, water pipe (hookah), or any similar form of lighted object or device containing tobacco or marijuana. Restricted areas include, but are not limited to, the Leased Premises, all interior areas of the Development or other developments of the Landlord, and areas within 25 feet of development buildings, or to the property boundary where that boundary is less than 25 feet from the property line of a development building. The Tenant, any member of the household, a guest, or another person under the Tenant's control must comply with the Smoke-Free Policy.
>
> The Landlord's adoption of the requirements in this paragraph 12(dd) does not make the Landlord a guarantor of the Tenant's or any other resident's health or of the smoke-free condition of restricted areas. The Landlord specifically disclaims any implied or express warranties that the Landlord's public housing properties will have higher or improved air quality or will be free from secondhand smoke.
>
> The Landlord will take reasonable steps to enforce the requirements of this paragraph 12(dd) utilizing a graduated enforcement policy, as provided in the Landlord's Smoke-Free Policy.

Local law also prohibits smoking in playgrounds and vaping any substance in common indoor areas of buildings.

NYCHA enforces its smoke-free policy with escalated warnings to residents and a progressive enforcement process, which includes educating residents about the hazards of smoking and providing smoking cessation resources.

Residents can visit the Smoke-Free NYCHA webpage to learn more about the initiative, access videos and articles featuring the work of the Smoke-Free NYCHA team, view a map that shows the 25-foot perimeter around NYCHA buildings, and connect to New York City and New York State resources to support people who smoke and want to quit or cut back.

To report a violation, contact the CCC at (718) 707-7771. As of spring 2026, residents can also report a violation through the Self-Service Portal.

To connect with the Smoke-Free NYCHA team, email smoke-free@nycha.nyc.gov or call (212) 306-8282. The team includes Smoke-Free Liaisons who provide policy education, coach current smokers who want to quit or cut back, and help residents navigate additional health resources.

ATTACHMENT K

STATEMENT ABOUT PUBLIC HOUSING INCOME LIMITS REQUIREMENTS

By Federal Register notice dated July 26, 2018, the U.S. Department of Housing and Urban Development (HUD) issued instructions for implementing the mandatory public housing income limit requirements in the Housing Opportunity Through Modernization Act (HOTMA). These requirements apply only to the public housing program. Housing authorities were required to implement these HOTMA changes by March 24, 2019, although HUD delayed full implementation as a result of the COVID-19 pandemic.

HUD approved a Significant Amendment to NYCHA's FY 2019 Annual Plan on June 19, 2019, which included a summary of NYCHA's over-income policy.

Under HOTMA, when a household's income exceeds the over-income limit which is determined by multiplying the applicable income limit for a very low income (VLI) family by a factor of 2.4 (which currently equates to 120 percent of area median income (AMI) for New York City), for twenty-four (24) consecutive months, housing authorities have the option to either evict them or offer them a new lease with the rent being the greater of the Fair Market Rent (FMR) or an amount of monthly subsidy for their unit including amounts from the operating and capital fund (the "subsidy amount").

As stated on page 16 of NYCHA's Significant Amendment to the FY 2019 Annual Plan, NYCHA has chosen to allow these households to remain in public housing, paying higher rent according to a HUD formula described above.

Starting in the second quarter of 2019, as HOTMA and HUD required, NYCHA began tracking public housing households whose incomes exceed 120 percent of AMI. NYCHA has tracked and will continue to track households over this limit when residents submit their annual recertifications, and during any interim reexaminations.

NYCHA has been notifying households of their over-income status since 2019, as required by HUD. However, because of the COVID-19 pandemic, HUD waived or delayed the full implementation of HOTMA rules.

HUD published new regulations on implementing HOTMA in February 2023. Under the regulations, NYCHA is required to provide households that exceed 120 percent of AMI for 24 consecutive months with three (3) notices. The first notice is sent after the first income examination that results in the household being above 120 percent of AMI. The second notice is sent if the household continues to exceed 120 percent of AMI following an income examination 12 months after the first exam. The third notice is sent if the household has exceeded 120 percent of AMI following an income examination 24 consecutive months after the first exam. NYCHA then offers these households a new non-public housing over-income lease and increases the household's rent to the greater of FMR or the "subsidy amount."

In accordance with HUD's 2023 regulations, to remain in public housing, paying the higher rent, these tenants will first need to sign a new non-public housing over-income lease. As required by law, tenants that sign a non-public housing over-income lease cannot participate in a public housing resident council or in programs that are only for public housing or low-income families because such tenants are not part of the public housing program. If a household that is over income for 24 consecutive months does not sign the non-public housing over-income lease, NYCHA is required by law to evict the family.

Since the HUD-calculated subsidy amount by development is lower than the FY 2027 FMR by bedroom size, NYCHA charges these households the applicable FMR rent for their apartment.

Apartment Size	FY 2026 Fair Market Rent*
Studio	$2,529
1 Bedroom	$2,655
2 Bedroom	$2,910
3 Bedroom	$3,644
4 Bedroom	$3,959
5 Bedroom	$4,553
6 Bedroom	$5,147

The chart below shows the income levels at which public housing families would be considered over-income under HOTMA based on family size and 2026 AMI levels (third column) as of May 1, 2026.

Family Size	FY 2026 50% AMI	Current Over-Income Limit FY 2026 120% AMI (50% AMI x 2.4)
1	$59,400	**$142,560**
2	$67,850	**$162,840**
3	$76,350	**$183,240**
4	$84,800	**$203,520**
5	$91,600	**$219,840**
6	$98,400	**$236,160**
7	$105,200	**$252,480**
8	$111,950	**$268,680**

NYCHA modified its Admissions and Continued Occupancy Policy (ACOP) to reflect HOTMA changes in accordance with HUD's 2023 regulation regarding over-income households. Over-income requirements, including the topics below, are discussed in Chapter 8 of the Admissions and Continued Occupancy Policy.

- How and when NYCHA will send notices to these households regarding when their rent will increase.
- Signing of the non-public housing over-income lease after 24 consecutive months of income exceeding 120 percent of AMI.
- Inability of these households to participate in public housing resident council or in programs that are only for public housing or low-income families.

ATTACHMENT L

The Housing Opportunity Through Modernization Act (HOTMA) SECTIONS 102 and 104

The U.S. Department of Housing and Urban Development (HUD) published new regulations in February 2023 implementing changes under the Housing Opportunity Through Modernization Act (HOTMA). Sections 102 and 104 of HOTMA make changes to the United States Housing Act of 1937, particularly those affecting income calculations and reviews. Section 102 changes requirements related to income reviews for Public Housing and Section 8 programs. Section 104 sets maximum asset limits for Public Housing and Section 8 applicants and participants.

On December 17, 2024, HUD published PIH Notice 2024-38 entitled "Housing Opportunity Through Modernization Act (HOTMA) Sections 102 and 104: Updated Guidance to Public Housing Agencies (PHAs) on Compliance." Pursuant to this notice, HUD requires PHAs to comply with the following HOTMA provisions by July 1, 2025: (1) Income exclusions (24 CFR 5.609(b)); (2) certain definitions (24 CFR 5.100, 5.403, 5.603); and (3) De Minimis Errors (24 CFR 5.609(c)(4); 960.257(f)). HUD previously required compliance with the HOTMA Earned Income Disregard (EID) phaseout and the new HUD-9886-A consent form. For all other HOTMA Sections 102 and 104 provisions, HUD has issued guidance via PIH Notice 2026-09 requiring implementation by January 1, 2027.

When implemented, the following changes will apply to the NYCHA's Housing Choice Voucher (HCV) and Public Housing programs.

ASSET LIMITATION

Restriction on Assistance to Families Based on Assets - Compliance at Admission

At admission, ownership of net household assets that exceed $100,000 (as adjusted for inflation) or ownership of disqualifying real property require denial of assistance. NYCHA does not have discretion to not enforce the asset limitation at admission. This real property restriction does not apply to:

a. Any property for which the household is receiving assistance under 24 CFR Part housing982, the Homeownership Option;
b. Any property that is jointly owned by a member of the household and at least one non-household member who does not live with the household but the non-household member resides at the jointly owned property;
c. Any property owned by a household that includes a person who is a victim of domestic violence, dating violence, sexual assault, or stalking, as defined in 24 CFR § 5.203; or
d. Any property that the household is offering for sale.

NYCHA has adopted a policy of non-enforcement of the asset limitation at annual and interim recertifications. NYCHA will not initiate termination or eviction proceedings for a household for non-compliance with the asset limitation.

CALCULATING INCOME

- **New Admissions and Interim Recertifications**
    - When calculating a household's income, including asset income, at the time of admission to the program or during interim reexaminations, NYCHA must use anticipated income (the household's estimated income for the upcoming 12-month period).

- **Annual Recertifications**
    - NYCHA has the option of using a "safe harbor" income verification from another federal means-tested program to verify gross annual income. Public housing did not opt to implement "safe harbor".
    - During annual recertifications, NYCHA will determine the household's income for the previous 12-month period and use this amount as the household income for annual recertifications; however, modifications to reflect current income will be made. NYCHA will consider any change of income since the household's last annual recertification.
    - NYCHA is required to factor in the Cost-of-Living Adjustments (COLA) when determining Social Security (SS) and Social Security disability (SSI) income for all annual and interim recertifications of household income that have not yet been completed and will be effective January 1 or later of the upcoming year.
    - If NYCHA becomes aware of an income calculation error, NYCHA will correct the error retroactively to the effective date of the error. NYCHA will not retroactively charge or require households to repay for amounts that were undercharged because of a NYCHA error in income calculation (effective July 1, 2025).

DEDUCTIONS AND EXPENSES

- **Unreimbursed Health and Medical Care Expenses and Reasonable Attendant Care and Auxiliary Apparatus Expenses**
    - HUD established a new higher threshold for deducting health and medical care expenses and unreimbursed reasonable attendant care and auxiliary apparatus expenses. The sum of unreimbursed health and medical care and reasonable attendant care and auxiliary expenses that exceed 10 percent of the household's annual income can be deducted from annual income. The 10 percent threshold will be phased-in over two years, as explained below. Prior to the implementation date of HOTMA sections 102 and 104, the threshold is 3 percent of the household's annual income.
    - Health and medical care expenses include costs incurred for the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. It also includes medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed. To claim unreimbursed health and medical care expenses, the family must have a head of household, co-head, or spouse that is elderly or a person with a disability.

- **Unreimbursed Reasonable Attendant Care and Auxiliary Apparatus Expenses**
    - To claim the deduction for the cost of unreimbursed reasonable attendant care and auxiliary apparatus expenses, the household must include a person with a disability, and the expenses must enable any member of the household (including the member who is a person with a disability) to be employed. If the unreimbursed reasonable attendant care and auxiliary apparatus expense exceeds the amount earned by the person who was enabled to work, the deduction will be capped at the amount earned by that individual.
    - Auxiliary apparatus expenses include, for example, expenses for wheelchairs, ramps, adaptations to vehicles, guide dogs, assistance animals, or special equipment to enable a person who is blind or has low vision to read, or type, or special equipment to assist a person who is deaf or hard of hearing. Some examples of attendant care expenses include teaching a person with disabilities how to perform day-to-day tasks independently like cleaning, bathing, doing laundry, and cooking.
    - Attendant care can be 24-hour care, or care during sporadic periods throughout the day.

Hardship Exemptions for Health and Medical Care Expenses and Reasonable Attendant Care and Auxiliary Apparatus Expenses

- **Phased In Relief**

- All households who received a deduction for unreimbursed health and medical care or reasonable attendant care and auxiliary apparatus expenses based on their most recent income review prior to the implementation date of HOTMA sections 102 and 104, will begin receiving the 24-month phased-in relief at their next annual recertification or interim recertification, whichever occurs first.
- Families who receive phased-in relief will have eligible expenses deducted that exceed 5 percent of annual income for 12 months. Twelve months after the 5 percent phase-in began, families will have eligible expenses deducted that exceed 7.5 percent of annual income for the immediately following 12 months. After the family has completed the 24 months phase-in at these lower thresholds the threshold will be expenses exceeding 10 percent of annual income, unless the family qualifies for relief under the general hardship relief provision.
- A household receiving phased-in relief may request to receive general hardship relief instead. However, once a family chooses to obtain general relief, a family may no longer receive the phased-in relief.

- **General Relief**

- To receive general relief, a family must demonstrate that the family's unreimbursed health and medical care expenses or unreimbursed reasonable attendant care and auxiliary apparatus expenses increased, or the family's financial hardship is a result of a change in circumstances that would not otherwise trigger an interim reexamination.
- Relief is available regardless of whether the family previously received an unreimbursed health and medical care expense deduction, unreimbursed reasonable attendant care

and auxiliary apparatus expense deduction, are currently receiving phased-in hardship relief, or were previously eligible for either this general relief or the phased-in relief.

- If NYCHA determines that a family is eligible for general relief, the family will receive a deduction for the sum of the eligible expenses that exceed 5 percent of annual income. The family's hardship relief ends when the circumstances that made the family eligible for the relief are no longer applicable or after 90 days, whichever comes earlier. NYCHA will extend the relief for one additional 90-day period while the family's hardship condition continues.

Child-Care Expenses Deduction and Hardship Exemption to Continue Child-Care Expenses Deduction

- Any reasonable child-care expenses necessary to enable a member of the family to be employed or to further their education are deducted from income. Reasonable child-care expenses are expenses for the care of children (including foster children if the unreimbursed child-care expenses are paid from the family's annual income and not from another source, such as a stipend from the child welfare agency), under 13 years of age, when all the following statements are true:
  - The care is necessary to enable a family member to be employed or to further their education (e.g., work, look for work, or further their education (academic or vocational)); and
  - The expense is not reimbursed by an agency or individual outside the household.

- A family whose eligibility for the child-care expense deduction is ending may receive a hardship exemption to continue receiving a child-care expense deduction in certain circumstances when the family no longer has a member that is working, looking for work, or seeking to further their education, and the deduction is necessary because the family is unable to pay their rent.
- The amount deducted must not exceed the amount of employment income that is included in annual income.
- The hardship exemption and the new adjusted income calculation will remain in place for a period of up to 90 days, after which the annual income will change to the original amount before the hardship exemption was granted. NYCHA will extend the relief for one additional 90-day period while the family's hardship condition continues.

HOUSEHOLD COMPOSITION (effective July 1, 2025)

The definition of family now includes a single person who:

- Is an otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age;
- Has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act (42 U.S.C. 675(5)(H)); and
- Is homeless or is at risk of becoming homeless at age 16 or older.

- **Definitions of Foster Adult and Foster Child (effective July 1, 2025)**
  - A foster adult is defined as a member of the household who is 18 years or older and meets the definition of a foster adult under New York state law. A foster child is defined as a member of the household who meets the definition of a foster child

under New York state law. In general, a foster child is placed with the family by an authorized placement agency (e.g., public child welfare agency) or by judgment, decree, or other order of any court of competent jurisdiction.

- Foster adults/children are not considered family members and must not be included in calculations of income for eligibility and rent determination purposes. However, foster adults/children are considered household members and must be included when determining unit size or subsidy standards based on established policies.
- Foster children and foster adults are not considered dependents.

INCOME

- **Annual Income**
  - Annual income includes all amounts received from all sources by each member of the family who is 18 years of age or older, the head of household, or spouse of the head of household, in addition to unearned income received by or on behalf of each dependent who is under 18 years of age. Annual income also includes the income of a day laborer, independent contractor, and seasonal worker regardless of age, unless otherwise excluded by HUD.
  - Annual income also includes all actual anticipated income from assets. Imputed income on the net family assets is included in annual income only when net family assets exceed $50,000 (as adjusted for inflation) and actual income from the assets cannot be calculated.
  - Note: Annual income includes "all amounts received," not the amount that a family may be legally entitled to receive but did not actually receive.

- **Determining Net Family Assets**
  - Net family assets are defined as the net cash value of all assets owned by the family, after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of investment, except as excluded by HUD.
  - Necessary personal property is excluded from net family assets. Necessary personal property are items essential to the family for the maintenance, use, and occupancy of the premises as a home; or they are necessary for employment, education, or health and wellness. Non-necessary personal property with a combined value greater than $50,000, is considered part of net family assets. When the combined value of all non-necessary personal property does not exceed $50,000, then all non-necessary personal property is excluded from net family assets.
  - **NYCHA's HCV program requires a household with total net assets that are equal to or less than $50,000 to submit third-party verification documents.**
  - **NYCHA's public housing program allows a household to self-certify total net assets equal to or less than $50,000.**

- **Trusts**
  - Whether the value of a trust counts as a net family asset and whether distributions from the trust count as annual income to the family depends on the following three factors:
    - Whether the trust is under the control of the family;
    - Whether distributions are made from the trust's principal; and

        - The purpose of the distribution, if the distribution is made from income earned on the trust's principal.
    - The value of irrevocable trusts and revocable trusts that are not under the control of the family are both excluded from net family assets.
    - If NYCHA determines that the revocable trust is included in the calculation of net family assets, then the actual income earned by the revocable trust is also included in the family's income from assets.

- **Imputed Income**
    - Imputed income from assets is no longer determined based on the greater of actual or imputed income from the assets. Instead, imputed asset income must be calculated for specific assets when three conditions are met:
        - The value of net family assets exceeds $50,000 (as adjusted for inflation);
        - The specific asset is included in net family assets; and
        - Actual asset income cannot be calculated for the specific asset.

- **Federal Tax Refunds or Refundable Tax Credits**
    - All amounts received by a family in the form of federal tax refunds or refundable tax credits are excluded from a family's net family assets for a period of 12 months after receipt by the family.

INCOME EXCLUSIONS (effective July 1, 2025)

- Income that will not be repeated beyond the coming year (i.e., the 12 months following the effective date of the certification), based on information provided by the family, is considered nonrecurring income, and is excluded from annual income. The nonrecurring income exclusion replaces the former exclusion for temporary, nonrecurring, and sporadic income (including gifts). Examples of nonrecurring income include temporary U.S. Census Bureau Employment, economic stimulus or recovery payments, state tax refunds, federal tax refunds, in-kind donations, lump-sum additions to net family assets, settlements, earned income of dependent full-time students, etc.
- Income that has a distinct end date and will not be repeated beyond the coming year during the family's upcoming annual reexamination period will be excluded from a family's annual income as nonrecurring income.

Student Financial Assistance (effective July 1, 2025)

Financial assistance for educational costs is generally excluded from income if the financial assistance is less than actual educational costs. Excess financial assistance received under 479B of the Higher Education Act (HEA) is excluded from income depending on the context, as explained below. Other excess financial assistance (non-HEA assistance) is never excluded from income.

- **For NYCHA's Public Housing residents**, all HEA assistance is excluded from income, including any excess portion. Other student financial assistance (non-HEA assistance) received by the student that, either by itself or in combination with HEA assistance, are in excess of the actual educational costs will be included in income.
- **For NYCHA Section 8 residents**, if HUD's congressional appropriation includes a Section 8 student financial assistance limitation (as it usually does), then the treatment of excess student financial assistance depends on who the student is.

- If the student is the head of household, co-head, or spouse and is 23 or younger or does not have dependent children, then excess HEA assistance and excess non-HEA assistance will be included in income. If the student is over 23 with dependent children, then all HEA assistance is excluded from income, including any portion that is in excess and only the non-HEA excess assistance will be included in income.
- If HUD's congressional appropriation does not include a Section 8 student financial assistance limitation, then financial assistance for educational costs will be treated the same as assistance is treated for public housing residents.
- The distinction between treatment of excess HEA assistance for Section 8 and public housing residents is required by HUD's statutory interpretation.

Other Types of Income Exclusions (Not All Inclusive) (effective July 1, 2025)

- Achieving a Better Life Experience (ABLE) Accounts, distributions from Coverdell Education Savings Accounts, 529 accounts and "Baby Bond" accounts, gross income from self-employment or operation of a business, civil rights judgements, settlements, etc.

Elimination of the Earned Income Disregard (EID)

- The EID allowed eligible families to have a portion of their earned income excluded from annual income for a maximum period of 24 consecutive months.
- As of December 31, 2023, no new signups for EID were permitted. Because the EID lasts up to 24 consecutive months, no family receives the EID benefit after December 31, 2025.

INTERIM RECERTIFICATIONS

- **Enterprise Income Verification (EIV)**
  NYCHA will eliminate the use of EIV requirement for interim reexaminations.
- **Decreases in Adjusted Income**
  NYCHA will conduct an interim reexamination of family income when the family reports that there is a change in the family's annual adjusted income.
- **Increases in Adjusted Income**
  - NYCHA will conduct an interim reexamination of family income when NYCHA becomes aware that the family's adjusted income has changed and will result in an increase of 10 percent or more in annual adjusted income.
  - NYCHA will conduct an interim if the household has zero income and is now reporting earned income.
  - NYCHA will not conduct an interim reexamination during the last three months of a certification period if the family reports an increase in income within three months of the next annual recertification effective date.

Authorization for the Release of Information (already in effect)

All applicants must sign the consent form at admission, and participants must sign the consent form no later than their next interim or regularly scheduled income recertification. After an applicant or participant has signed and submitted a consent form, they do not need to sign and submit subsequent consent forms at the next interim or regularly scheduled income recertification except under the following circumstances:

- When any person 18 years or older becomes a member of the family;
- When a member of the family turns 18 years of age; and
- As required by HUD or NYCHA in administrative instructions

The executed consent forms will remain effective until the family is denied assistance, the assistance is terminated, or the family provides written notification to NYCHA to revoke consent. Revocation of consent or refusal to sign the consent forms prohibits NYCHA from providing assistance. A family has the right to revoke consent by providing written notice to NYCHA. However, revoking the consent will result in termination of assistance or denial of admission to program.

Determination of Income Using Other Means Tested Public Assistance (i.e., "Safe Harbor")
NYCHA may determine a family's annual income, including income from assets, prior to the application of any deductions based on income determinations made within the previous 12-month period, using income determinations from the following types of means-tested federal public assistance programs:

- The Temporary Assistance for Needy Families block grant (42 U.S.C. 601, et seq.).
- Medicaid (42 U.S.C. 1396 et seq.).
- The Supplemental Nutrition Assistance Program (42 U.S.C. 2011 et seq.).
- The Earned Income Tax Credit (26 U.S.C. 32).
- The Low-Income Housing Tax Credit (26 U.S.C. 42).
- The Special Supplemental Nutrition Program for Woman, Infants, and Children (42 U.S.C. 1786).
- Supplemental Security Income (42 U.S.C. 1381 et seq.).
- Other programs administered by the Secretary.
- Other means-tested forms of federal public assistance for which HUD has established a memorandum of understanding.
- Other federal benefit determinations made by other means-tested federal programs that the Secretary determines to have comparable reliability and announces through a Federal Register notice.

NYCHA must obtain the verification via third-party verification. The third-party verification must state the family size, must be for the entire family (i.e., the family members listed in the documentation must match the family's composition in the assisted unit, except for household members), and must state the amount of the family's annual income.

If NYCHA uses a Safe Harbor determination to determine the family's income for an income examination (New Admission/Move Ins, Interim Recertification, or Annual Recertification), then the family is obligated to report changes in income that meet the reporting requirement and occur after the effective date of the action. NYCHA's public housing program has opted not to implement Safe Harbor.

ATTACHMENT M

Public Housing Resident Advisory Board (RAB) Members

District	Name	Development	Delegate /Alternate
Bronx North	Keith Ramsey	Eastchester Gardens	Delegate (Section 8)
Bronx North	Lilithe Lozano	Parkside	Delegate
Bronx North	Maurice Tony Edwards	Marble Hill	Delegate
Bronx North	Walter McNeil	Edenwald	Delegate (Section 8)
Bronx South	Dana Elden	St. Mary's Park	Delegate
Bronx South	Daniel Barber	Jackson	Delegate
Bronx South	Gwendolyn Primus	Webster/Morrisania	Delegate
Bronx South	Maria Forbes	Clay Avenue	Delegate
Bronx South	Princella Jamerson	Millbrook/Millbrook Extension	Delegate
Bronx South	Raymond Serrano	Stebbins Hewitt	Delegate (Section 8)
Brooklyn East	Lisa Kenner	Van Dyke	Delegate
Brooklyn East	Reginald Bowman	Seth Low	Delegate
Brooklyn South	Frances Brown	Red Hook East	Delegate
Brooklyn South	Sheryl Boyce	Bayview	Delegate (Section 8)
Brooklyn West	Adorn DuBose	Sumner	Delegate
Brooklyn West	Darold Burgess	Ingersoll	Delegate
Brooklyn West	Lohoma Shipman	Bushwick	Delegate
Brooklyn West	Debra Benders	Cooper Park	Delegate
Brooklyn West	Dorene Flowers	Farragut	Delegate
Manhattan North	Bernadette McNear	Rangel	Delegate
Manhattan North	Luis Torres	Clinton	Delegate
Manhattan North	Nathaniel Green	Dyckman	Delegate
Manhattan South	Aixa Torres	Smith	Delegate
Manhattan South	Cynthia Tibbs	WSUR Brownstones	Delegate
Manhattan South	Kazi Islam	Lower Eastside II	Delegate
Manhattan South	Ramona Minor	DeHostos	Delegate
Queens North	Bridget Marachlian	Bland	Delegate
Queens North	Corinne Woods-Haynes	Queensbridge I & II	Delegate
Queens North	Tamika Williams	Pomonok	Delegate
Queens South	Eugenia Gibson	Beach 41st Street	Delegate
Queens South	Kimberly Comes	Redfern	Delegate
Queens South	Lawanda Gainey-Johnson	Carleton Manor	Delegate
Queens South	Margareth Massac	Oceanside	Delegate
Staten Island	Brenda "Kiko" Charles	Mariner's Harbor	Delegate
Staten Island	Clifton Creque	Berry	Delegate
Staten Island	Shekina Butler	West Brighton I & II	Delegate (Section 8)

ATTACHMENT N

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

APRIL 14 & 15, 2026

- Introductions
- Roll Call
- RAB Meeting Schedule
- FY 2027 Annual Plan Schedule as of April 14, 2026
- Real Estate Development Updates
- Comments and Questions

MAY 12 & 13, 2026

- Introductions
- Roll Call
- FY 2027 Annual Plan Schedule
- Capital Projects Portfolio Overview
- Detailed 2027-2031 Federal Capital Plan
- Section 3 Efforts for Capital Projects
- Comments and Questions

JUNE 9 & 10, 2026

- Introductions
- Roll Call
- NYC Public Housing Trust – Trust Modernization Project
- NYCHA's Designated Plan for Elderly-Only Developments & Buildings – Update
- New Construction: Transfer of Assistance – Update
- Comments and Questions

ATTACHMENT O

PIH NOTICE 2016-17-RENTAL ASSISTANCE DEMONSTRATION (RAD) NOTICE REGARDING FAIR HOUSING AND CIVIL RIGHTS REQUIREMENTS AND RELOCATION REQUIREMENTS APPLICABLE TO RAD FIRST COMPONENT – PUBLIC HOUSING CONVERSION

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Office of Public and Indian Housing
Office of Housing

Special Attention of:	**Notice** H 2016-17 PIH 2016-17 (HA)
Public Housing Agencies Public Housing Hub Office Directors Public Housing Program Center Directors Multifamily HUB Directors Multifamily Program Center Directors Regional and Field Office Directors Regional Administrators Performance Based Contract Administrators RAD Transaction Managers Regional Relocation Specialists	Issued: November 10, 2016 Effective: November 10, 2016 Expires: This Notice remains in effect until amended, superseded, or rescinded Supplements: PIH Notice 2012-32 (HA) REV-2 Supersedes: H 2014-09/PIH 2014-17

SUBJECT: Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions.[1]

SECTION 1. Purpose, Applicability and Major Provisions of this Notice

1.1. Purpose

This notice (Notice) provides PHAs,[2] Project Owners, and their RAD development partners with guidance regarding key fair housing and civil rights statutory and regulatory requirements, explains the situations in which HUD is requiring front-end fair housing and civil rights reviews, and provides information regarding the types of information that must be submitted to facilitate HUD's review of certain fair housing and civil rights requirements in connection with public housing conversions under the First Component of RAD. This Notice also includes guidance

[1] While this Notice addresses fair housing and civil rights requirements and relocation requirements, the fair housing and civil rights requirements are not limited to relocation issues.
[2] Consistent with PIH Notice 2012-32 (HA) REV-2 (PIH 2012-32 (HA) REV-2) (the "RAD Notice"), this Notice uses the term "PHA" to refer to the owner of the project prior to the RAD conversion and "Project Owner" to refer to the owner of the project after the RAD conversion.

regarding key relocation statutory and regulatory requirements, and details relocation requirements under RAD. This Notice only applies to projects converting under the First Component of RAD; it does not apply to the Second Component of RAD.[3]

The RAD program was established as a tool for preserving and improving low-income housing stock. RAD is intended to facilitate reinvestment in or redevelopment of the long-term-affordable stock of HUD-assisted housing properties. RAD also provides mobility benefits for assisted residents of converted properties through the choice mobility option, allowing these households to access tenant-based Housing Choice Vouchers. In some cases, RAD can be a tool for transfer of rental assistance from distressed or poorly selected sites to new sites in high opportunity areas. In all cases, the objective is to better serve low-income residents and the broader community in complying with fair housing, other civil rights, and relocation laws.

This Notice provides PHAs and Project Owners with guidance relating to planning and implementing public housing (First Component) RAD conversions in a manner consistent with existing fair housing and other civil rights requirements, including, but not limited to, those associated with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, Titles II and III of the Americans with Disabilities Act, the Architectural Barriers Act of 1968, and their implementing regulations. Section 4 of this Notice summarizes key provisions of existing law applicable to RAD transactions.

To further compliance with these existing requirements, PIH 2012-32 (HA) REV-2, issued June 15, 2015 (the "RAD Notice") established that specific PHA decisions and activities planned to be part of a First Component RAD conversion must be reviewed by HUD prior to implementation (the "front-end" fair housing and civil rights reviews). Through a front-end review of the enumerated PHA decisions, HUD seeks to assist PHAs and Project Owners in meeting their fair housing, other civil rights, and relocation obligations. Section 5 of this Notice explains the situations in which HUD is requiring front-end fair housing, other civil rights, and relocation reviews, details the procedures for HUD's front-end review and the type of information that must be submitted for these reviews, and the timeframes for these reviews.

Finally, in Sections 6 and 7 this Notice provides PHAs and Project Owners with guidance regarding RAD program and other statutory and regulatory relocation assistance requirements when planning for or implementing resident moves as a result of a conversion of a public housing project under RAD. This guidance includes reiterated and new requirements, the corresponding required reviews, and explanation of the interaction between RAD relocation procedures and certain existing public housing requirements. PHAs and Project Owners implementing RAD transactions may be subject to (a) the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA),

[3] Important fair housing, other civil rights, and relocation considerations apply also to the Second Component of RAD as provided in the RAD Notice. Participants in the Second Component of RAD must continue to comply with applicable fair housing, civil rights, and relocation statutes and regulations, and HUD may, at any time, initiate compliance or enforcement actions in connection with such requirements. The RAD Notice will continue as the primary source of information on fair housing and other civil rights requirements covering the Second Component of RAD without any change until further notice.

(b) the requirements of Section 104(d) of the Housing and Community Development Act of 1974 (Section 104(d)) if CDBG or HOME funds are included as part of the project, (c) fair housing and other civil rights considerations implicated by relocation activities, and (d) requirements for relocating residents under the RAD Notice.

1.2. PHA and Project Owner Responsibilities

This Notice explains RAD's front-end fair housing and other civil rights review requirements in greater detail than was provided in the RAD Notice and this Notice restates and revises RAD's relocation requirements. However, the fair housing, other civil rights, and relocation requirements that apply to RAD conversions are neither limited to those discussed in this Notice, nor to those specifically reviewed by HUD in the front-end review.

MEETING HUD'S PROCESS AND REVIEW REQUIREMENTS NEVER CONSTITUTES COMPLIANCE WITH SUCH LAWS. THE OBLIGATION TO COMPLY WITH APPLICABLE FAIR HOUSING, OTHER CIVIL RIGHTS, AND RELOCATION LAWS REMAINS WITH THE PHA AND PROJECT OWNER.

The fair housing and civil rights requirements that apply to RAD conversions are not limited to those discussed in this Notice. PHAs and Project Owners are responsible at all times for ensuring that their RAD activities (including those activities implemented by their agents, consultants, contractors, or other RAD team members) comply with all applicable fair housing and civil rights requirements. PHAs and Project Owners shall be accountable for all fair housing and civil rights compliance issues with respect to their RAD activities, whether those activities are undertaken directly or through agents, consultants, contractors, or other RAD team members. While HUD provides this non-exhaustive guidance to assist PHAs and Project Owners during transactions, complying with the requirements set forth in this Notice does not necessarily mean that they, or their agents or consultants, are in compliance with fair housing and civil rights requirements.[4]

This Notice is not intended to, and shall not be construed to, reduce or in any way limit the application of fair housing, other civil rights, and relocation laws and regulations to RAD transactions. For example, HUD's reliance on a PHA's certification that a site meets the site and neighborhood standards required by the RAD Notice is not a determination of compliance with the duty to affirmatively further fair housing or other fair housing and civil rights requirements. As another example, HUD's approval of a site for new construction does not, by itself, constitute a determination of the PHA's compliance with all provisions of Title VI and its duty to affirmatively further fair housing found in the Fair Housing Act and other fair housing and civil rights requirements, nor indicate HUD's approval of the PHA's or locality's overall housing strategy. HUD's approval of a RAD conversion after front-end review reflects only that the project may proceed through the RAD conversion process; it does not constitute a determination

[4] The PHA's or Project Owner's agents, consultants, contractors, and other RAD team members may also have fair housing and other civil rights obligations (whether under this Notice or otherwise) and the forgoing does not, in any way, limit the independent obligation of any such parties to ensure their own compliance with applicable fair housing and other civil rights laws.

that the project is in compliance with applicable fair housing, civil rights, and relocation requirements.

HUD's approval of a front-end review submission is based on limited information and is intended to assist the PHA or Project Owner in meeting their fair housing, civil rights, and relocation obligations.[5] The PHA is responsible for ensuring that its RAD conversion is consistent with its certification to affirmatively further fair housing and complies with applicable civil rights laws.[6] The front-end reviews described in this Notice shall not be construed to limit other fair housing and civil rights investigations that HUD may conduct. HUD retains all compliance and enforcement authority.

HUD's determination that the PHA or Project Owner has failed to meet submission, certification, or approval requirements with respect to fair housing, other civil rights, or relocation requirements is grounds for terminating a Commitment to enter into a Housing Assistance Payments Contract (CHAP), denying the issuance of a RAD Conversion Commitment (RCC), or denying authority to convert under RAD.

1.3. Applicability

The content of this Notice should not be relied upon in carrying out any other activities funded under any other HUD program, except where specifically directed by HUD.

This Notice supplements the RAD Notice with respect to fair housing and civil rights requirements applicable to public housing properties converting under RAD and with respect to all matters related to the relocation of residents as a result of RAD public housing conversions. To the extent that there is a conflict between this Notice and the RAD Notice, this Notice shall govern. This Notice replaces and supersedes Notice H 2014-09/PIH 2014-17 (issued July 14, 2014).

Upon issuance, the terms of this Notice will apply to all projects that have applied for conversion of assistance under the First Component of RAD but have not yet converted. As this Notice provides guidance, clarification, and explanation regarding fair housing and civil rights requirements that are already applicable to RAD conversions, this Notice shall not affect any front-end civil rights approvals provided by HUD prior to the effective date of this Notice and otherwise shall be effective with respect to front-end civil rights approvals without exception. However, with respect to relocation activities for Converting Projects under the First Component where a PHA has already submitted a Financing Plan pursuant to the RAD Notice at the time of issuance of this Notice, and provided that the Financing Plan has been accepted for full review after initial screening for completeness, the PHA may, within sixty (60) days after issuance of this Notice, request (in writing uploaded to the RAD Resource Desk) to be governed by H 2014-

[5] For example, the front-end review is specific to an individual site. A PHA that does not promote fair housing choice outside areas of minority concentration and continues to site affordable housing in minority concentrated areas may be in noncompliance with the duty to affirmatively further fair housing and other fair housing and civil rights obligations, even if the specific site is approved based on the information provided and pursuant to the front-end review of the PHA's site and neighborhood standards submission.

[6] See 24 C.F.R. § 5.105 and, as applicable, 24 C.F.R. § 983.57(b)(2) or Appendix III of the RAD Notice.

09/PIH 2014-17. For such projects and where otherwise appropriate in cases of hardship as determined by HUD, HUD may apply the terms of H 2014-09/PIH 2014-17 with respect to relocation activities, but not with respect to fair housing and civil rights requirements.

RAD projects which have been awarded Choice Neighborhoods Implementation (CNI) grants are subject to the provisions of the applicable Choice Neighborhoods Notice of Funding Availability (NOFA) and grant agreement regarding site and neighborhood standards and are not subject to the RAD front-end civil rights transaction reviews described in this Notice. For properties being redeveloped with funding under a CNI grant, the relocation requirements set forth in this Notice are superseded by guidance regarding relocation included in the CNI NOFA. Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a Choice Neighborhood project's conversion of assistance.

1.4. Explanation of Major Provisions

This Notice adds to and revises pre-existing guidance related to fair housing, civil rights, and relocation (as contained in the RAD Notice and H 2014-09/PIH 2014-17) with respect to RAD transactions. Among the key provisions and changes are the following:

<u>Fair Housing & Civil Rights</u>

- Reaffirms the applicability of fair housing and civil rights requirements to all RAD-related activities (see, e.g., Section 3.3 and Section 4);
- Reiterates when HUD front-end civil rights review (originally outlined in the RAD Notice) is required in addition to the PHA's analysis and certification of compliance, to assist the PHA and Project Owner to comply with fair housing and civil rights requirements (see Section 5.3);
- Outlines certain conditions under which HUD will conduct a front-end review to determine whether the site is in an area of minority concentration relative to the site's housing market area (see Section 5.4(A));
- Provides guidance, for purposes of the RAD front-end civil rights review, on the concepts of "area of minority concentration" and "housing market area" that are reviewed when determining whether a site is in an area of minority concentration (see Section 5.4(B));
- Elaborates on specific information that HUD will consider, and that PHAs should provide evidence of, in order for a proposed site to meet the existing exceptions to permit new construction in an area of minority concentration, identifies presumptions for meeting the sufficient comparable opportunities exception and describes factors that HUD may consider in evaluating the overriding housing needs exception (see Section 5.4(C) and Section 5.4(D));
- Articulates issues that HUD will consider in completing the front-end civil rights review for transfers of assistance, including, for example, accessibility and minority concentration (see Section 5.5);
- Outlines the information to be submitted for HUD's front-end civil rights review of transactions where unit reductions, unit reconfigurations, or changes in occupancy are proposed (see Section 5.6);
- Identifies the situations where front-end civil rights reviews are required when changes in the accessibility features of a site are made (see Section 5.7(B)); and

- Prohibits the Project Owner of a Converted Project with a PBRA HAP contract from initiating any new leasing or marketing activities (other than leasing and outreach to households holding a right to return to the Covered Project), including the solicitation, distribution or acceptance of applications or development of a waiting list, until HUD has approved the Affirmative Fair Housing Marketing Plan ("AFHMP") (see Section 5.8).

Relocation

- Requires PHAs or Project Owners to prepare a written relocation plan for all transactions that involve permanent relocation or temporary relocation anticipated to exceed 12 months (see Section 6.1);
- Requires PHAs to provide residents with a RAD Information Notice (RIN) in order to ensure that residents are informed of potential project plans and of their rights in connection with RAD prior to submission of the RAD application (see Section 6.6(A));
- Clarifies that the General Information Notice (GIN), when applicable, should be provided as soon as feasible and no later than 30 days following the issuance of the CHAP (see Section 6.6(B));
- Requires Project Owners to provide a notification of Return to the Covered Project, when applicable (see Section 6.6(F));
- Moves the date before which PHAs are prohibited from beginning any physical relocation earlier in the conversion process (specifically, from the date of Closing to the later of the effective date of the RCC and the expiration of the 30- or 90-day RAD Notice of Relocation period, as applicable) (see Section 6.8);
- Clarifies the specific requirements applicable to different types of relocation (e.g., moves within a property, temporary relocation of less than 12 months, etc.) (see, e.g., Section 6.4);
- Provides enhanced guidance on the right to return requirements, any offers of alternative housing options and the documentation that must be retained when tenants choose an alternative housing option and decline their right to return (see, e.g., Section 6.2 and Section 6.10);
- Describes how HUD has administratively implemented URA requirements and URA relocation assistance and payments for displaced persons, when applicable, to residents who choose to decline the right of return and, instead, choose voluntary permanent relocation (see, e.g., Section 6.4(C) through (F) and Section 6.10);
- Requires PHAs to maintain detailed data regarding each household that will be relocated, with key dates of notices and moves (see Section 6.9); and
- Identifies key fair housing and civil rights requirements applicable during relocation (see, e.g., Section 4).

1.5. Request for Public Comment

HUD acknowledges the complexity of the issues addressed in this Notice. This Notice is effective immediately upon issuance, but HUD also seeks comment from the public regarding the clarity and organization of the Notice and regarding areas where the policies and procedures described are unclear or ambiguous. HUD will consider whether changes in response to comments are justified and will implement any appropriate changes in a revision of this Notice. Please submit all comments to RAD@hud.gov within 30 days of the issuance of this Notice.

1.6. Paperwork Reduction Act

In accordance with the Paperwork Reduction Act (PRA), HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number. OMB approved information collection forms will be posted on the RAD website and the Federal Register.

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SECTION 3. Background

3.1. RAD Authority

RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Pub. L. No. 112-55, enacted November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Public Law 113-76, enacted January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Public Law 113-235, enacted December 6, 2014), and the Division L, Title II, Section 237 of the Consolidated Appropriations Act (Public Law 114-113, enacted December 18, 2016), collectively and as it may be further amended from time to time, the "RAD Statute." RAD allows certain eligible properties to convert assistance to long-term project-based Section 8 contracts and has two separate components. The First Component allows projects funded under the public housing program to convert their assistance to long-term, project-based Section 8 rental assistance contracts. Under this component of RAD, public housing agencies (PHAs) may choose between two different Section 8 housing assistance programs: project based vouchers (PBVs) or project-based rental assistance (PBRA). The "Second Component" of RAD allows owners of projects funded under the Rent Supplement (Rent Supp), Rental Assistance Payment (RAP), and Moderate Rehabilitation programs to convert certain units to PBV or PBRA Section 8 units following certain contract expirations or terminations. The RAD Statute is implemented by the RAD Notice.

3.2. Definitions

All capitalized terms defined in the RAD Notice, as amended, shall have the definitions ascribed to them therein unless otherwise specifically noted in this Notice.[7] Pre-conversion projects whose assistance is converting from public housing to Section 8 under RAD are referred to in the RAD Notice and in this Notice as "Converting Projects." Post-conversion projects are referred to in the RAD Notice and this Notice as "Covered Projects."

3.3. Applicable Legal Authorities

Appendix I to this Notice identifies key legal authorities with respect to fair housing, civil rights, and resident relocation. Part 2 of Appendix I provides greater detail regarding federal accessibility requirements set forth in three of the legal authorities described in Appendix I,

[7] Many of the fair housing and civil rights concepts used throughout this Notice are terms of art that are defined in applicable statutes and regulations identified in Appendix I of this Notice, while others have been developed through judicial interpretation. PHAs and Project Owners should familiarize themselves with these terms of art and should consult 42 U.S.C. § 3602 (Fair Housing Act); 24 C.F.R. §§ 5.152-100.20 (Fair Housing Act); 42 U.S.C. §§ 2000d-2000d-4a (Title VI of the Civil Rights Act of 1964); 24 C.F.R. § 1.2 (Title VI); 29 U.S.C. § 705 (Rehabilitation Act); 24 C.F.R. § 8.3 (Section 504); 42 U.S.C. §§ 12102, 12132, 12181 (Americans with Disabilities Act (ADA)); 28 C.F.R. § 35.104 (Title II of the ADA); and 28 C.F.R. § 36.104 (Title III of the ADA). In addition, many of the relocation concepts are terms of art that are defined in 42 U.S.C. § 4601 *et seq*. (Uniform Relocation Act (URA)), Section 104(d) of the Housing and Community Development Act of 1974 codified at 42 U.S.C. § 5304(d), and their implementing regulations at 49 C.F.R Part 24 and 24 C.F.R. Part 42 subpart C.

Part 1. PHAs and Project Owners must be familiar with these legal authorities and must evaluate, based on the facts of their situation, which legal authorities are applicable in which situations. **Failure to comply with any legal authority as applicable to the PHA's or Project Owner's actions or inactions may result in liability under such authority.** Appendix I does not attempt to provide a complete and exhaustive explanation of the legal authorities, nor to fully inventory the situations in which each legal authority is applicable. Instead, Appendix I is an overview intended to serve as a general introduction or reminder for PHAs and Project Owners of these fair housing, other civil rights, and relocation authorities and to facilitate their identification of appropriate topics for further research or expert counsel. The recitation of these legal authorities neither expands nor diminishes their applicability to the PHA's and Project Owner's activities in connection with their RAD conversion.

The RAD Statute authorizes the Secretary of HUD to waive or specify alternative requirements for certain provisions of law, except for requirements related to, among others, fair housing and nondiscrimination.[8] In addition to the general application of various federal statutes and their implementing regulations as discussed in Appendix I, below, HUD regulations at 24 C.F.R. § 5.105 apply such authorities to all HUD programs, including RAD.

3.4. Further Information

Because each RAD proposal varies in its scope, this Notice may not address each PHA's or Project Owner's specific circumstances. PHAs and Project Owners should carefully review the laws, regulations, notices, and guidance material referenced in this Notice. Any questions related to the administration of the RAD program should be referred to the appropriate RAD Transaction Manager (TM) or may be emailed to rad@hud.gov.

SECTION 4. Generally Applicable Fair Housing and Civil Rights Requirements Relevant Throughout the RAD Conversion Process

This Section provides a summary overview of key principles regarding program implementation and an overview of generally applicable fair housing and civil rights requirements. Appendix I identifies the key legal authorities from which these principles are derived. These key principals, together and with the legal authorities identified in Appendix I, frame the PHA's efforts to implement a RAD conversion. In some cases, these requirements are particularly relevant to the process of planning the RAD conversion, while in others they have particular relevance for the structure of the RAD transaction itself, and in yet other cases, both. Elements of RAD transactions that have civil rights implications include, but are not limited to, transfers of assistance, temporary and permanent relocation, demolition, site selection, new construction, occupancy policies, changes in unit configuration, increases or reductions in units, waiting list administration policies, policies regarding return of temporarily relocated tenants, substantial rehabilitation or alteration, program accessibility, tenant selection policies and priority transfers, providing information to and communicating with persons with Limited English Proficiency (LEP) and persons with disabilities, reasonable accommodation policies, and Affirmative Fair

[8] *See* Pub. L. No. 112-55, as amended.

Housing Marketing Plans (AFHMPs). All PHAs must consider civil rights when structuring these and other elements of their RAD transaction.

RAD transactions are governed by the same civil rights authorities that govern HUD-assisted activities generally.[9] Converting Projects are subject to civil rights and equal opportunity requirements under the public housing regulations, and Covered Projects are subject to civil rights and equal opportunity requirements under the PBV regulations or the PBRA regulations, as applicable.[10] As described further below, the Fair Housing Act prohibits discrimination in housing[11] and requires all federal executive departments and agencies to "administer their programs and activities relating to housing and urban development … in a manner affirmatively to further" fair housing.[12] In addition, all programs or activities receiving Federal financial assistance are subject to Title VI of the Civil Rights Act of 1964 forbidding discrimination on the basis of race, color, and national origin[13] and Section 504 of the Rehabilitation Act of 1973, which forbids discrimination on the basis of disability and requires that programs or activities receiving Federal financial assistance make such programs or activities "when viewed in its entirety" readily accessible to persons with disabilities and make reasonable accommodation to the needs of persons with disabilities.[14] RAD transactions are also subject, as applicable, to the requirements of Titles II and III of the Americans with Disabilities Act, Executive Order 11063, and HUD regulations at 24 C.F.R. part 107. Thus, as with the administration of all HUD programs and all HUD-assisted activities, fair housing and civil rights issues must be considered in the administration of the RAD program. PHAs must not implement actions and policies that may have a discriminatory effect on the basis of race, color, sex, national origin, religion, disability, or familial status or that may impede, obstruct, prevent, or undermine efforts to affirmatively further fair housing.[15] Note, in particular, the following requirements:

- **Affirmatively Furthering Fair Housing (AFFH):** The Fair Housing Act requires that HUD administer its programs and activities in a manner that affirmatively furthers the purposes of the Fair Housing Act. The Fair Housing Act not only prohibits discrimination but, in conjunction with other statutes, directs HUD's recipients, including PHAs, to take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination. Through various statutes, regulations, and executive orders, PHAs must take various actions in accordance and in conjunction with their Fair Housing Act obligation to affirmatively further fair housing. For example, under regulations implementing the United States Housing Act of 1937 (the Act), HUD recipients must, among other requirements, certify that they will affirmatively further fair housing. In addition, under HUD's Affirmatively Furthering Fair Housing (AFFH) rule promulgated July 16, 2015, PHAs must periodically conduct an Assessment

[9] *See* 24 C.F.R. § 5.105.
[10] *See, e.g.*, 24 C.F.R. §§ 880.601, 881.601 and 983.8 for civil rights related regulations applicable to PBV and PBRA transactions.
[11] *See* 42 U.S.C. §§ 3601 *et seq*., and HUD regulations in 24 C.F.R. part 100
[12] 42 U.S.C. § 3608(d) and (e).
[13] *See* 42 U.S.C. §§ 2000d *et. seq*., and HUD regulations in 24 C.F.R. part 1.
[14] *See* 29 U.S.C. §§ 701 *et seq*., and HUD regulations in 24 C.F.R. part 8.
[15] *See* 24 C.F.R. part 1 and part 100 subpart G.

of Fair Housing (AFH) as set out by the rule, either individually or in collaboration with other program participants.[16] Under the AFFH rule, in order to develop a successful affirmatively furthering fair housing strategy, the PHA must assess the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs. PHAs must ensure that their activities in connection with a RAD conversion are consistent with their AFH, including any applicable joint or regional AFH in which they are a joint participant, and with any applicable Analysis of Impediments to Fair Housing Choice (AI), Fair Housing Equity Assessment, PHA 5-Year Plan, PHA Annual Plan, Moving to Work (MTW) Plan, or related planning documents and other regulatory and programmatic requirements implementing the obligation to affirmatively further fair housing to which they are a party.[17]

- **Nondiscriminatory Site Selection:** HUD's site and neighborhood standards require that the proposed site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provision of Title VI of the Civil Rights Act, the Fair Housing Act, Executive Order 11063, and Department regulations implementing these authorities. The site must meet the Section 504 site selection requirements in 24 C.F.R. § 8.4(b)(5). Additional provisions appear in 24 C.F.R. § 983.57(b) of the PBV rules and, for PBRA, in Appendix III of the RAD Notice. HUD's Title VI regulation specifically prohibits site selection that has the "purpose or effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination" on the basis of race, color, or national origin.[18] The Title VI regulations also impose an obligation on the part of an applicant or recipient of HUD financial assistance to take actions to overcome the effect of prior discrimination or conditions that limit participation by persons of a particular race, color, or national origin.[19] In addition, HUD's Section 504 regulation prohibits recipients from selecting sites the purpose or effect of which would (1) exclude qualified individuals with disabilities from or deny them the benefit of a program or activity, or otherwise subject them to discrimination; or (2) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities.[20] ADA regulations likewise prohibit site selections that have the purpose or effect of excluding individuals with disabilities (including members of the public with disabilities), denying them benefits, or subjecting them to discrimination.[21] Finally, the Fair Housing Act prohibits discriminatory site selection, including perpetuation of segregation in transfers of assistance and new construction.

- **Meaningful Access for Persons with Limited English Proficiency (LEP):** The PHA or Project Owner is required to take reasonable steps to ensure (a) they provide meaningful access to programs and activities for persons who have a limited ability to read, speak, or understand English; (b) any person with LEP who will be temporarily relocated or

[16] 24 C.F.R. § 5.150 *et seq.*
[17] *See* 24 C.F.R. § 5.150 *et seq*. and 24 C.F.R. §§ 91.225, 91.325, or 91.425.
[18] *See* 24 C.F.R. § 1.4(b)(3).
[19] *See* 24 C.F.R. § 1.4(b)(6).
[20] *See* 24 C.F.R. § 8.4(b)(5).
[21] *See* 28 C.F.R. § 35.130(b)(4); 28 C.F.R. § 36.301.

permanently displaced has meaningful access to any public meetings regarding the project; and (c) they provide meaningful access to LEP persons to any information provided to residents including, but not limited to, any relocation notices. Generally, the PHA or Project Owner will be responsible for providing oral interpreters at meetings, including ensuring their competence, and covering any associated translation and interpretation costs.[22]

- **Effective Communication for Persons with Disabilities:** Communications and materials must be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 C.F.R. § 8.6) and with 49 C.F.R. § 24.5, and as applicable, the Americans with Disabilities Act. This includes ensuring that, unless such actions would result in undue financial and administrative burdens or fundamental alterations, notices and resident meetings are provided in appropriate alternative formats as needed, e.g., Braille, audio, large type, accessible electronic communications, assistive listening devices, and sign language interpreters. Even in cases where the proposed actions may result in undue financial and administrative burdens or fundamental alterations, certain actions must still be taken. Specifically, appropriate auxiliary aids and services that would not result in such undue burdens or fundamental alterations must still be provided to ensure effective communication.

- **Accessible Meeting Facilities for Persons with Disabilities:** Pursuant to regulations implementing Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, as applicable, all programs and activities must be held in accessible locations unless doing so would result in an undue financial and administrative burden on the PHA and/or Project Owner, in which case the PHA or Project Owner must take any action that would not result in such undue burden but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity, e.g., briefings at an alternate accessible site or in-home briefing.[23] Individuals with disabilities must receive services in the most integrated setting appropriate to their needs. The most integrated setting appropriate to the needs of qualified individuals with disabilities is a setting that enables individuals with disabilities to interact with persons without disabilities to the fullest extent possible.[24]

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[22] For more information about LEP obligations, see HUD's Limited English Proficiency (LEP) Frequently Asked Questions guidance at http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq#q26.

[23] In selecting locations for consultation with residents, the PHA and/or Project Owner shall be guided by the goal of maximizing participation in an integrated setting so that residents with disabilities and residents without disabilities may hear and consider each other's views. Priority shall be given to using on-site accessible locations (including, e.g., TV rooms or informal gathering places), even if doing so may require multiple sessions with smaller groups of residents. In addition, Title III of the Americans with Disabilities Act requires private entities that operate places of public accommodation, including social service establishments, leasing offices of private housing developments, and certain private housing providers, to comply with certain physical accessibility requirements which are similar to the requirements under Section 504 and Title II.

[24] *See* 28 C.F.R. part 35, Appendix B.

- **Accessibility for Persons with Disabilities Throughout the Planning and Implementation Process:** A number of accessibility requirements, including but not limited to site selection, apply to all RAD conversions, as they do to the PHA's activities regardless of the PHA's participation in RAD.[25] PHAs and Project Owners should also be aware that state or local laws, regulations, and codes may contain greater accessibility requirements. This Notice provides, in Appendix I, Part 2, an overview of accessibility requirements under existing law. The information in Appendix I, Part 2 is intended to assist with the PHA's or Project Owner's compliance with accessibility requirements. PHAs and Project Owners must review Appendix I, Part 2 early-on in planning for the RAD transaction. PHAs and Project Owners may determine that it is most efficient to address accessibility matters early in the project planning. In addition, PHAs and Project Owners must evaluate, throughout the transaction and based on the facts of their situation, which requirements are applicable in which situations to ensure they appropriately address accessibility requirements. PHAs and Project Owners are responsible for ensuring that the architectural drawings and construction comply with the PHA's and Project Owner's obligations and all Federal civil rights requirements, including accessibility requirements under the Fair Housing Act, Section 504, and the ADA.

  Accessibility requirements also apply during all stages of a RAD transaction, including during relocation. Existing information (e.g., resident characteristics forms, including identification of the need for accessible unit features; records of approved reasonable accommodations; and records of the presence of accessible unit features) and the residents themselves should be consulted throughout the process of developing and implementing a RAD conversion. Related activities include, but are not limited to:

  - Identifying and maintaining existing and pending reasonable accommodations, including the need for larger units to accommodate live-in aides or special equipment;
  - Determining what direct services may be needed as a reasonable accommodation (e.g., packing, moving, identification of temporary housing);
  - Identifying accessible unit features and assuring that temporary or permanent replacement housing contains comparable features;
  - Budgeting appropriately to ensure that reasonable accommodations are addressed.

  For more information about compliance with accessibility requirements, the PHA or Project Owner should refer to appropriate notices concerning civil rights requirements and may contact HUD's Office of Fair Housing and Equal Opportunity in either the Washington, D.C. or applicable field offices for more specific guidance. For additional, non-exhaustive guidance on providing relocation assistance to persons with disabilities, see Exhibit 3-1 in HUD Handbook 1378.

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[25] For more detailed information on these laws and their requirements, see PIH Notice 2010-26, issued July 26, 2010 (available at http://www.hud.gov/offices/pih/publications/notices/10/pih2010-26.pdf). While this notice has an expiration date in 2011, because the notice summarizes and discusses regulatory requirements, the information in the notice provides helpful guidance.

- **Reasonable Accommodations in Rules, Policies, Practices and Services**: Under the Fair Housing Act, the PHA or Project Owner must make reasonable accommodations in rules, policies, practices, and services when such accommodations may be necessary to afford a person with a disability an equal opportunity to use and enjoy a dwelling.[26] Under Section 504, the PHA or Project Owner must also make reasonable accommodations to residents with disabilities, which may include providing and paying for structural modifications to dwelling units and public or common use areas. Titles II and III of the ADA provide similar requirements. Common examples of reasonable accommodations that may occur during relocation are permitting an individual with a disability to relocate near public transportation, providing a unit larger than otherwise permitted for a live-in aide, and making exceptions to no-animal rules for assistance and service animals. Accommodations generally need not be made where providing such an accommodation would be an undue financial and administrative burden or a fundamental alteration of the nature of the service. However, reasonable accommodations must be made to the extent the accommodation does not impose an undue financial and administrative burden or a fundamental alteration of the nature of the service. Reasonable accommodations must follow the individual with the disability throughout the RAD process, including during relocation. Furthermore, PHAs and Project Owners may be required to provide particular reasonable accommodations during relocation, such as assistance moving household items.[27]

- **Physical Changes to Dwelling Units, Public and Common Use Areas and Other Facilities for Accessibility**: Under the Fair Housing Act, the PHA or Project Owner may be required to permit reasonable modifications. A reasonable modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. Reasonable modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. A request for a reasonable modification may be made at any time during the tenancy. When relocating an individual with a disability who has such modifications in their dwelling unit or public and common use areas because of the individual's disability, regardless of who made them, the PHA or Project Owner has an obligation to provide and pay for such modification in the new dwelling. When considering requests by individuals with disabilities for structural changes to units or public and common use areas, PHAs and Project Owners should take particular note that they may be required to make and pay for such structural modifications as reasonable

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[26] For additional information regarding reasonable accommodations under the Fair Housing Act, *see* the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Reasonable Accommodations Under the Fair Housing Act (May 17, 2004), at http://www.hud.gov/offices/fheo/library/huddojstatement.pdf.

[27] *See* 49 C.F.R. part 24, Appendix A, § 24.2(a)(8)(vii), which states that under the URA, "Reasonable accommodation of a displaced person with a disability at the replacement dwelling means the Agency is required to address persons with a physical impairment that substantially limits one or more of the major life activities. In these situations, reasonable accommodation should include the following at a minimum: Doors of adequate width; ramps or other assistance devices to traverse stairs and access bathtubs, shower stalls, toilets and sinks; storage cabinets, vanities, sink and mirrors at appropriate heights. Kitchen accommodations will include sinks and storage cabinets built at appropriate heights for access. The Agency shall also consider other items that may be necessary, such as physical modification to a unit, based on the displaced person's needs."

accommodations under Section 504 and because of similar requirements under the ADA even though the Fair Housing Act may only require the owner to allow such changes to be made and paid for by the individual with a disability. Before determining that they are not required to make or pay for structural changes, PHAs and Project Owners are encouraged to consider carefully their obligations under each applicable statute.

SECTION 5. Application of Key Fair Housing and Civil Rights Requirements to RAD Transactions

The generally applicable fair housing and other civil rights requirements described above, and in Appendix I, apply throughout the planning and implementation of a RAD transaction and the PHA is responsible for ensuring compliance with these requirements. As key requirements may be misunderstood, the RAD program has established specific additional procedures to assist RAD participants to ensure they comply with the applicable requirements. Specifically, the RAD Notice established a civil rights eligibility review and criteria for front-end civil rights reviews.

This Section elaborates on these requirements from the RAD Notice. The front-end review procedures described below establish procedures and criteria for the supplemental front-end review and technical assistance, criteria which are specific to the RAD program. Criteria for this supplemental front-end review are informed by, but not the same as, fair housing or civil rights rules and policies generally.

This Section is organized to loosely follow the stages of a RAD conversion transaction, beginning with RAD eligibility and continuing through site selection, transfer of assistance, unit design requirements and marketing. In addition, this Section describes the timing and procedures for submitting data and documents to HUD so that HUD may complete its front-end review. The submission procedures are also designed to serve as a tool for PHAs to identify issues of potential concern at appropriate stages of the RAD conversion and as a tool for HUD to identify potential needs for technical assistance.

5.1. RAD Eligibility Review

To be eligible for RAD, the PHA must meet all eligibility requirements set forth in Section 1.3 of the RAD Notice, including the civil rights threshold requirements found at Section 1.3.G of the RAD Notice. A PHA must not have a charge, cause determination, lawsuit, or letter of findings, referenced in Section 1.3.G of the RAD Notice, against the PHA itself, its transferees, proposed development partners, or sub-recipients that has not been resolved, or is not in the process of being resolved, to HUD's satisfaction. This determination shall be made prior to issuance of the CHAP.

The CHAP may be revoked by HUD if HUD determines that the terms of the conversion would be inconsistent with fair housing and civil rights laws or a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement. HUD may terminate a CHAP or RCC if it determines that the terms of the conversion would be inconsistent with fair housing or civil rights laws or is inconsistent with, would hinder, or would delay satisfaction of a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement.

HUD may terminate an approval to proceed with a RAD conversion if it determines that the terms of the conversion would be inconsistent with fair housing or civil rights laws or a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement.

5.2. PHA's Proposed Site Selection and Certification

For all RAD conversions, the PHA must comply with all applicable site selection requirements as set forth in this Notice and the RAD Notice and in accordance with any additional applicable published guidance provided by HUD. As set forth in the RAD Notice, conversions of assistance to PBV involving new construction, whether on a new site or on a current site, are subject to the site selection standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (e), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2). All other conversions to PBV, including transfers of assistance to an existing property other than the Converting Project, are subject to the standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (d), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2).[28] Site selection requirements set forth at Appendix III of the RAD Notice apply to RAD conversions to PBRA assistance, as does the requirement not to place housing in neighborhoods with highly concentrated poverty based on the criteria formulated for transfers under Section 8(bb) of the United States Housing Act of 1937.[29] PBV and PBRA site selection must also be consistent with the requirements of the Fair Housing Act, Title VI, Section 504, the ADA and their implementing regulations.

It is the PHA's responsibility to ensure that the site selection complies with all applicable site selection requirements, including the requirements of this Notice and the RAD Notice. Pursuant to the RAD Notice, the PHA must certify with the submission of its Annual Plan, Significant Amendment to its Annual Plan, or MTW Plan that it complies with the applicable site selection requirements and must maintain records of its analysis and the data relied upon in making its determination of compliance. The PHA must also determine and subsequently state in the certification that the site is "suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto."[30] Although this Notice provides detail regarding certain civil rights-related site and neighborhood standards, PHAs must certify compliance with <u>all</u> applicable site and neighborhood standards.[31]

The PHA must also certify that, in conducting its review of site selection for the proposed project, the PHA completed a review with respect to accessibility for persons with disabilities and that the proposed site is consistent with applicable accessibility standards under the Fair Housing Act, Section 504, and the ADA. The site and neighborhood standards for PBV and PBRA require the site to be "suitable from the standpoint of facilitating and furthering full compliance with" the Fair Housing Act and require the site to meet the Section 504 site selection

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[28] *See* the provisions of Section 1.6.A.4 of the RAD Notice.
[29] 42 U.S.C. § 1437f(bb).
[30] For RAD conversions to PBRA, the RAD Notice uses the term "the site and neighborhood is suitable," rather than "the site is suitable." *See* Appendix III of the RAD Notice, paragraph (a).
[31] *See* 24 C.F.R. § 983.57 and the RAD Notice at Section 1.4(A)(7)

requirements described in 24 C.F.R. § 8.4(b)(5).[32] The Fair Housing Act, as implemented at 24 C.F.R. § 100.205, requires "covered multifamily dwellings" built for first occupancy after March 13, 1991, to contain accessible design features. HUD's Section 504 regulations at 24 C.F.R. § 8.4(b)(5) require that, in determining the site or location of a federally assisted facility, an applicant for assistance or recipient may not make selections the purpose or effect of which would: (i) exclude qualified individuals with disabilities from, deny them the benefits of, or otherwise subject them to discrimination under, any program or activity that receives Federal financial assistance from HUD, or (ii) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities. Title II of the ADA contains a similar requirement that a public entity, such as the PHA, may not, in determining the site or location of a facility, make selections (i) that have the effect of excluding individuals with disabilities from, denying them the benefits of, or otherwise subjecting them to discrimination; or (ii) that have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the service, program, or activity with respect to individuals with disabilities.[33] Factors relevant to a site review under these standards may include, among others:

- Site features, such as inaccessible slopes in routes, lack of accessible sidewalks, curb ramps, accessible parking spaces, and placement of dumpsters or other physical features that would impede access to and movement within the site;
- Building features, such as inaccessible building entrances, other methods of ingress and egress, public and common use areas (e.g., the rental office, parking areas, mail areas, trash areas, community rooms, shared use toilet rooms, laundry facilities and walkways inside and outside that connect these public and common use areas to units), and barriers to access by members of the public; and
- Lack of accessible transit or para-transit and accessible public sidewalks and accessible transportation stops.

When such conditions are present at the site and would exclude individuals with disabilities from, deny them the benefits of, or otherwise subject them to discrimination, or would defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to individuals with disabilities, the site must not be selected unless the proposal includes remediation of the barriers to achieve compliance with accessibility requirements (including identification and remediation of any nonconforming design and construction conditions in "covered multifamily dwellings" under the Fair Housing Act). Remediation of the barriers may include, for example, physical accessibility improvements to the site, arrangements for access to accessible supportive services, or reasonable accommodations for current or prospective residents with disabilities, including members of the public. The Financing Plan submitted to HUD must describe and document resources sufficient to pay for the remediation of accessibility barriers.[34]

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[32] *See* 24 C.F.R. § 983.57(b)(2) (PBV conversions); *see also,* Appendix III (a) of the RAD Notice (PBRA conversions).

[33] *See* 28 C.F.R. § 35.130(b)(4).

[34] In conducting its review prior to certification, and in preparing for the certification, PHAs and Project Owners may find it useful to consult with their local or regional FHEO office, the United States Access Board, local or state

While all PHAs must certify their compliance with applicable site selection requirements as described in this Section, some RAD transactions will also be subject to a front-end review of the site selection. For transactions involving activities that present site selection issues of greater complexity, as described in Sections 5.3 through 5.5 below, front-end review will allow HUD's Office of Fair Housing and Equal Opportunity (FHEO) to assist the PHA to consider relevant laws and regulations while completing its site selection review and certification.

5.3. RAD Front-End Civil Rights Transaction Review

Fair Housing Act and other civil rights issues may arise throughout a RAD transaction. Under the Fair Housing Act, an assessment of site suitability includes an analysis of the impact that the siting of the project would have on patterns of segregation for protected classes. The Fair Housing Act is of particular importance when a RAD proposal concerns site selection for new construction or reconfiguration of housing on the original public housing site – for example, the unit size distribution (e.g., conversion of larger bedroom size units to one-bedroom units, which may have an adverse impact on housing opportunities for families with children) or a reduction in the number or distribution of accessible units (which may have an adverse impact on housing opportunities for persons with disabilities). RAD conversions involving new construction must also comply with the Fair Housing Act's accessibility requirements.

Compliance with all applicable fair housing and civil rights requirements is the responsibility of both the PHA and the Project Owner. However, to assist with compliance, HUD's Office of Fair Housing and Equal Opportunity (FHEO) will conduct a front-end civil rights review of project proposals containing activities identified as particularly at risk of violating applicable fair housing and civil rights laws. The activities that must be submitted for front-end civil rights review are listed in Section 5.3(A), below.

A) Activities Subject to Front-End Civil Rights Review

All RAD conversions that include one or more of the activities listed below (Sections 5.3(A)(1) through 5.3(A)(9)) are subject to a front-end review for compliance with certain civil rights and fair housing requirements. The specific items that HUD will review in the front-end review will depend on which activities are involved in the specific transaction. A RAD conversion may not include one of the activities below without prior written approval from HUD. All Financing Plans must include evidence that the PHA has secured written approval from HUD for any of the following activities that are included in its RAD conversion:

(1) Conversions of assistance involving new construction, whether on a new site or on a current site, in an area of minority concentration. Front-end review of this activity shall be pursuant to Section 5.4(B), below and, in addition, the PHA shall

architectural access board or other accessibility authority for information on accessibility standards. Other sources of information on accessibility requirements may include protection and advocacy organizations or independent living centers. In addition, the non-HUD resources may provide advice on how to assess accessibility needs and formulate physical accessibility strategies.

certify in its Annual Plan compliance with site and neighborhood standards applicable to new construction as described in Section 5.2.

(2) Transfers of assistance where all or a portion of the Converting Project's assistance is transferred to a new site(s) (either new construction or to an existing project) as part of the subject transaction. Front-end review of this activity shall be pursuant to Section 5.5(B), below and, in addition, the PHA shall certify in its Annual Plan compliance with site and neighborhood standards applicable to existing housing as described in Section 5.2.

(3) Conversions of assistance where the total number of units in the Covered Project is less than the original number of units in the Converting Project (this includes de minimis reductions). Front-end review of this activity shall be pursuant to Section 5.6.

(4) Conversions of assistance where the Covered Project's unit configuration is different from the unit configuration of the Converting Project. Front-end review of this activity shall be pursuant to Section 5.6.

(5) Conversions involving a change in occupancy, where the Covered Project serves a different population from the one served by the Converting Project (e.g., when a Converting Project serves families but the Covered Project is subject to an elderly preference or introduction of restrictions or preferences based on age or disability that will change the occupancy of the property). Front-end review of this activity shall be pursuant to Section 5.6.

(6) Conversions of assistance in which the construction schedule indicates that relocation is likely to exceed 12 months. Front-end review of this activity shall be pursuant to Section 5.7(A).

(7) Conversions of assistance involving new construction or substantial alteration,[35] as those terms are defined in Section 504 of the Rehabilitation Act of 1973. Front-end review of this activity shall be pursuant to Section 5.7(B).

(8) Conversions of assistance involving a Converting Project subject to a Voluntary Compliance Agreement or Conciliation Agreement with HUD or a Consent Decree or Settlement Agreement with the U.S. Department of Justice or HUD, or where the PHA is subject to such an agreement affecting its entire housing portfolio or otherwise related to the Converting Project. Front-end review of this activity shall be pursuant to Section 5.7(C).

[35] Section 504 defines substantial alteration of a housing project as alterations where a housing project has 15 or more units, and the rehabilitation costs will be 75% or more of the replacement cost of the completed facility. *See* 24 C.F.R. § 8.23 (a).

(9) Conversions of assistance where HUD has identified potential fair housing and civil rights concerns or a history of such concerns. Front-end review of this activity shall be pursuant to Section 5.7(C).

PHAs should note that a proposed RAD conversion may trigger front-end review regarding more than one of the activities listed in subsections (1) through (9) of this Section. For example, depending on the details of the proposal, a new construction on-site project could require review under subsections (1), (3), (4), (5), (6), and (7), or could require review under only subsections (1) and (7).

As part of HUD's review of these elements of the RAD conversion plans, HUD may require that PHAs that are carrying out portfolio or multi-phased conversions provide information on their conversion plans for other projects or subsequent phases to ensure that the overall plans for RAD conversion are consistent with civil rights and fair housing.

B) Fair Housing, Civil Rights, and Relocation Checklist

In connection with HUD's front-end fair housing and civil rights and relocation reviews described in this Section 5 and in Section 6, HUD is requiring submission of a Fair Housing, Civil Rights, and Relocation Checklist (the "Checklist"). The Checklist will facilitate the PHAs' and Project Owners' submission of necessary information to complete these reviews.[36] HUD anticipates that a revised Checklist, when available following Paperwork Reduction Act approval, will be separated into parts which can be submitted incrementally as the PHA and Project Owner develop the RAD transaction plans, with different elements of the Checklist applicable at different stages of the transaction planning process. For example, submissions regarding site selection for a RAD transaction involving new construction may occur well before submissions regarding a proposal to change the unit configuration.

The Checklist will outline the minimum information or documentation which HUD will need in order to review each part of the Checklist. After HUD's initial review of any portion of the Checklist, HUD may determine that the data provided in the Checklist is insufficient for HUD to complete its review, in which case HUD may require the PHA or Project Owner to provide supplemental information. The PHA should submit each part as early as possible once the information covered in the applicable part is known. All information specified in the applicable

[36] The Checklist is available at www.hud.gov/rad. As of the publication of this Notice, references to the Checklist refer to the existing FHEO Accessibility and Relocation Plan Checklist under OMB Approval 2577-0276. The PHA shall use the existing Checklist to provide information related to demonstrating compliance with fair housing, other civil rights, and relocation requirements (including accessibility requirements) and, as necessary, may require additional materials for HUD to complete its review, which the PHA may provide in such form as the PHA determines appropriate. Also at www.hud.gov/rad, HUD has provided a listing of information that, depending on the circumstances, HUD may require to complete different components of its front-end review. The Checklist is being revised to fully capture the submission requirements described in this Notice. The revised Checklist will be subject to Paperwork Reduction Act approval and will be posted at the website listed above when available for use.

part of the Checklist must be submitted to HUD for HUD to begin its civil rights review – partial submissions of any applicable part of the Checklist will not be accepted.[37]

C) Timing of Front-End Review Submissions

PHAs and Project Owners are encouraged to submit applicable portions of the Checklist and information associated with a particular activity subject to front-end review as early as possible in the development of their plans. The PHA must ensure that HUD has approved all applicable parts of the Checklist prior to submission of the Financing Plan. Upon request from the PHA, HUD may, at HUD's sole discretion, permit submission of the Financing Plan prior to receipt of approval of the applicable parts of the Checklist and conditioned upon subsequent receipt of such approvals, in which event the PHA and Project Owner may proceed at their own risk.

Early approval of the site of the Covered Project is critical for RAD transaction proposals subject to front-end civil rights review involving site selection standards, specifically new construction in areas of minority concentration (see Section 5.3(A)(1)) and transfers of assistance (see Section 5.3(A)(2)). The PHA must conduct its own assessment of the site during the early stages of planning its RAD transaction. The guidance in this Notice and the Checklist are tools intended to assist the PHA in conducting its own assessment of the site.

The PHA must provide HUD with the Checklist and backup information sufficient for HUD to review the site with respect to the applicable standards. The site selection information should be provided to HUD no later than ninety (90) days following the issuance of the CHAP or, if the CHAP has already been issued as of the publication of this Notice, within ninety (90) days following publication of this Notice. In the event of a change in plans for the Converting Project that would require a front-end review of the site selection standards, the PHA must provide the Checklist and backup documentation within sixty (60) days of the change in plans. PHAs are strongly encouraged to provide front-end review submissions and secure HUD approval prior to applying for LIHTCs or taking action the reversal of which (in the event of non-approval of the site) would be detrimental to the PHA or the Project Owner. PHAs are also encouraged to contact FHEO for technical assistance prior to submission of these materials.

All PHAs shall submit a certification consistent with the requirements of Section 5.2, above. This certification may be prepared specifically in connection with the Checklist or as part of the PHA Annual Plan or Significant Amendment. However, HUD will not consider a submission complete for front-end civil rights review without this certification. All RAD conversions must submit the PHA certification described in Section 5.2 no later than at the time of submission of the Financing Plan.

D) Completion of HUD's Front-End Review

HUD will not approve a RAD conversion if HUD determines that the conversion would operate to discriminate in violation of applicable fair housing and civil rights laws. HUD will not approve proposals that have the purpose, intent, or effect of discriminating on the basis of

[37] The Checklist refers to the existing FHEO Accessibility and Relocation Checklist until a revised Checklist is approved for use pursuant to the Paperwork Reduction Act.

protected class (*i.e.*, race, color, national origin, religion, sex, disability, and familial status). If HUD does not approve a proposed activity based on a front-end review, then it will provide a written description of concerns or deficiencies. The PHA may resubmit the front-end review materials with a changed proposal and/or with additional information addressing HUD's concerns and any deficiencies in the proposal or the submission.

In some circumstances, a special condition to the transaction's RCC will be necessary to ensure that a RAD transaction conforms to fair housing and civil rights requirements. Special conditions to the RCC reflect the conditions necessary in order to complete the RAD conversion. For example, if there is an outstanding remedial agreement or order requiring particular development activities or operating policies to correct a violation of a fair housing or other civil rights requirement, the RCC generally will condition participation in RAD upon agreement by the PHA or the Project Owner, as applicable, to comply with the provisions of such agreements or orders after conversion.

5.4. Front-End Civil Rights Review for RAD Transactions Involving New Construction

A) Conditions Triggering Review

If the proposed project is located in an area of minority concentration, the new site may be approved only if it falls under a permitted exception and meets the other site selection requirements described in Section 5.2. Under the PBV and PBRA site and neighborhood standards, HUD may approve new construction in an area of minority concentration, consistent with the regulatory requirements cited above, only if:

a. Sufficient, comparable housing opportunities for minority families in the income range to be served by the proposed project exist outside areas of minority concentration; or
b. The project is necessary to meet overriding housing needs that cannot be met in that housing market area.[38]

As described in the RAD Notice and in Section 5.3(A) of this Notice, above, HUD will conduct a front-end civil rights review of the PHA's proposed site in certain circumstances. This Notice specifies that for conversions of assistance involving new construction where there are indications that the site may be located in an area of minority concentration per the criteria in subsections (i), (ii), or (iii), below (whether the construction is located on the existing public housing site or on a new site), HUD will conduct a front-end civil rights review of the site to determine whether the site is in an area of minority concentration and, if so, whether it meets one of the exceptions that would allow for new construction in an area of minority concentration.

The PHA shall submit for HUD front-end review the PHA's findings, together with backup documentation, regarding site selection when the site meets any of the following criteria:

i. The PHA self-identifies the area of the site as an area of minority concentration,

[38] 24 C.F.R. § 983.57(e)(3) and Appendix III of the RAD Notice, paragraph (e).

ii. The census tract of the site meets the extent of minority concentration described in Section 5.4(B)(1), below, or
iii. An area comprised of the census tract of the site together with all adjacent census tracts, analyzed as a whole, meets the extent of minority concentration described in Section 5.4(B)(1), below.

If any of these three criteria is applicable, HUD will conduct a review to determine whether the site is in an area of minority concentration and, if applicable, whether the proposed site fits one of the exceptions permitting new construction in an area of minority concentration described in this Section 5.4. A proposed RAD transaction which does not meet one of these triggers must still be evaluated by the PHA and the PHA must certify compliance with the site selection requirements as described in Section 5.2, above.

A PHA seeking to undertake new construction must receive written approval from HUD of any site selection subject to front-end review prior to entering into any construction contract for that new construction.

B) Analysis of Areas of Minority Concentration

This Section sets forth the methodology that HUD will use in the analysis of the extent of minority concentration, the area of the site, and the housing market area for purposes of the RAD front-end civil rights review. As noted below, this analysis is fact specific and PHAs may submit documentation to inform HUD's analysis in cases where there is strong evidence that an alternative methodology would be more appropriate.

(1) For purposes of RAD, a site is considered to be in an area of minority concentration when either (i) the percentage of persons of a particular racial or ethnic minority within the area of the site is at least 20 percentage points higher than the percentage of that minority group in the housing market area as a whole or (ii) the total percentage of minority persons within the area of the site is at least 20 points higher than the total percentage of minorities in the housing market area as a whole.[39]

(2) For purposes of RAD, the analysis of an area of minority concentration will use census tracts to approximate the "area" of the site but the analysis may consider alternate proposed geographies instead of the census tract in instances where there is strong evidence that such geography is more appropriate. Strong evidence that an alternative geography is more appropriate includes: (i) that the site is close to the edge of the census tract, (ii) that the population of the census tract is heavily influenced by the size of the Converting Project, or (iii) that the local community

[39] The percentage of minorities shall be calculated by subtracting the percentage of White Non-Hispanic persons in the relevant area from 100%. The analysis shall be based on the most recently available decennial census data found at http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_DP_DPDP1&src=pt. However, if such data is more than five years old, and if either the PHA or HUD requests the use of more recent data based on such party's awareness of significant and material shifts in the demographics of the relevant area in the intervening years, the analysis shall be based on the most recent American Communities Survey data.

understanding of the immediate neighborhood dictates a different boundary. Local community understanding of the immediate neighborhood is often informed by factors such as patterns of housing stock (such as different residential densities in different areas or differential housing prices for similar properties), community facilities and amenities (such as schools and commercial areas) or major geographic barriers (such as rivers or interstate highways), among other factors.[40] HUD will determine the site's "area" using the best available evidence and following the legal standards set forth in applicable case law.

(3) For purposes of the RAD analysis under this Section 5.4, a "housing market area" is the geographic region from which it is likely that residents of housing at the proposed site would be drawn for a given multifamily housing project. A housing market area generally corresponds to, as applicable: (i) the Metropolitan Statistical Area (MetroSA); (ii) the Micropolitan Statistical Area (MicroSA); or (iii) if the site is in neither a MetroSA nor a MicroSA, either (x) the county or statistically equivalent area, or (y) the PHA's service area, whichever is larger.[41] The analysis may consider a larger or smaller housing market area in instances where there is strong evidence that such housing market area is more appropriate. Strong evidence that an alternative housing market area is more appropriate may include factors such as regional employment centers and commuting patterns serving such employment centers. A PHA seeking to use an alternative housing market area must consult with HUD and establish to HUD's satisfaction that the methodology for identifying and documenting the alternative housing market area is warranted and sound.

C) The Sufficient Comparable Opportunities Exception

As required by the RAD Notice and noted in Section 5.4(A), one of the exceptions under which the site and neighborhood standards permit new construction in areas of minority concentration is if sufficient, comparable housing opportunities for low-income minority families exist outside areas of minority concentration. This section clarifies HUD's procedures for assessing comparable housing opportunities and evaluating how the proposed new construction will impact the balance of housing choices within and outside areas of minority concentration. It also includes a list of the information PHAs should submit to inform HUD's assessment of relevant factors, and key considerations guiding HUD's analysis of each factor.

Under the governing PBV and PBRA requirements, units are considered comparable opportunities if they are the same household type (e.g., elderly, disabled, family, large family), tenure type (owner, renter), require approximately the same total tenant payment toward rent,

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[40] For further explanation, *see, e.g., King v. Harris*, 464 F.Supp.827, 839-41 (E.D.N.Y. 1979).

[41] Items (i) and (ii) are consistent with a Core Based Statistical Area as defined by the Office of Management and Budget. For reference, a Core Based Statistical Area consists of the county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core.

serve the same income group, are located in the same housing market area, and are in standard condition.[42]

It is important to note that the sufficient comparable housing opportunities exception "does not require that in every locality there be an equal number of assisted units within and outside of areas of minority concentration. Rather, application of this standard should produce a reasonable distribution of assisted units each year, that, over a period of several years, will approach an appropriate balance of housing choices within and outside areas of minority concentration. An appropriate balance in any jurisdiction must be determined in light of local conditions affecting the range of housing choices available for low-income minority families and in relation to the racial mix of the locality's population."[43]

HUD will assess "the overall impact of HUD-assisted housing on the availability of housing choices for low-income minority families in and outside areas of minority concentration, and must take into account the extent to which the following factors are present, along with other factors relevant to housing choice."[44] Under this exception, it is not sufficient for one factor to be present, nor is it required that all factors be present, as the analysis must consider all relevant facts and evaluate the totality of the circumstances.

- "A significant number of assisted housing units are available outside areas of minority concentration."[45] While HUD must consider all factors relevant to housing choice, 30% or more of deeply subsidized housing units for very low-income persons would be a significant number. To facilitate HUD's consideration of this factor, a PHA should provide the number, occupancy type, and location of all comparable assisted units.[46]
- "There is significant integration of assisted housing projects constructed or rehabilitated in the past 10 years, relative to the racial mix of the eligible population."[47] To facilitate HUD's consideration of this factor, a PHA should provide the name and location of assisted housing projects constructed or rehabilitated in the PHA's jurisdiction in the past 10 years and the demographic characteristics of the residents of each of these projects;
- "There are racially integrated neighborhoods in the locality."[48] To facilitate HUD's consideration of this factor, a PHA should provide the name and census tracts where these racially integrated neighborhoods are located. In general, HUD will consider a neighborhood racially integrated if the neighborhood does not have a high concentration of persons of a particular race or ethnicity when compared to the housing market area in which the neighborhood is located.

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[42] *See* 24 C.F.R. § 983.57(e)(3)(iv) and Appendix III of the RAD Notice, paragraph (e)(1)(A).
[43] 24 C.F.R. § 983.57(e)(3)(iii); *see also* Appendix III of the RAD Notice, paragraph (e)(1).
[44] 24 C.F.R. § 983.57(e)(3)(v); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B).
[45] 24 C.F.R. § 983.57(e)(3)(v)(A) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(i).
[46] Note that this factor is in reference to comparable assisted units that may or may not be in the PHA's portfolio. The presumption stated at the end of this Section (i.e., that sufficient comparable opportunities exist if at least 50% of the comparable hard units in the PHA's portfolio, including PBV developments using the PHA's subsidy, are outside areas of minority concentration) is focused on units within the PHA's portfolio.
[47] 24 C.F.R. § 983.57(e)(3)(v)(B) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(ii).
[48] 24 C.F.R. § 983.57(e)(3)(v)(C) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(iii).

- "Programs are operated by the locality to assist minority families that wish to find housing outside areas of minority concentration."[49] Such programs may include measures such as increasing payment standards in excess of 110% of FMR or the use of Small Area FMRs, including in setting exception rents, or reservation of a percentage of HCVs dedicated to support choice mobility selections or implementation of proven mobility counseling and supports for residents, provided the PHA provides sufficient evidence that it will continue such measures. To facilitate HUD's consideration of this factor, a PHA should provide the names of the applicable program(s); the entity responsible for implementing the program(s) (e.g., city, county, state government); and any information demonstrating that the program(s) has been successful or predictably will achieve success in assisting persons who wish to move to non-concentrated areas.
- "Minority families have benefited from local activities (e.g., acquisition and write-down of sites, tax relief programs for homeowners, acquisitions of units for use as assisted housing units) undertaken to expand choice for minority families outside of areas of minority concentration."[50] To facilitate HUD's consideration of this factor, a PHA should provide the names of the applicable activity(s); the entity responsible for implementing the activity(s) (e.g., city, county, state government); and any information demonstrating that the activity(s) has been successful in expanding choice for minority families outside of areas of minority concentration;
- "A significant proportion of minority households has been successful in finding units in non-minority areas under the tenant-based assistance programs" (e.g., the Housing Choice Voucher programs).[51] To facilitate HUD's consideration of this factor, a PHA should provide the number of minority households receiving Housing Choice Vouchers; the number of minority households using HCVs in non-minority areas; and the non-minority census tracts where the HCVs are being used. While each local situation is distinct and HUD must consider all factors relevant to housing choice, 30% or more of new leases signed by minority heads of household using HCVs located in non-minority areas over a period greater than three years prior to the date of HUD's analysis would be a significant proportion.
- "Comparable housing opportunities have been made available outside areas of minority concentration through other programs."[52] To facilitate HUD's consideration of this factor, a PHA should describe the opportunities that have been made available, the location of those opportunities, and the number of minority families that have benefitted from the program in recent years. Such programs could include choice mobility strategies, acquisition strategies to acquire and add to the PHA's portfolio existing apartments in high opportunity areas and transfers of assistance to high opportunity areas.

HUD may consider evidence based on a reliable housing market analysis in evaluating the foregoing factors, along with other factors relevant to housing choice. In the event HUD

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[49] 24 C.F.R. § 983.57(e)(3)(v)(D); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(iv).
[50] 24 C.F.R. § 983.57(e)(3)(v)(E); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(v).
[51] 24 C.F.R. § 983.57(e)(3)(v)(F); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(vi).
[52] 24 C.F.R. § 983.57(e)(3)(v)(G) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(vii).

determines such an analysis would assist in this evaluation, HUD will consult with appropriate parties to establish or accept an appropriate methodology for such an analysis to address HUD's civil rights concerns and to ensure appropriate independence between the analyst and the PHA or Project Owner commissioning and paying for the study.

Absent information to the contrary, for purposes of HUD's front-end review of the PHA's analysis, HUD will apply a presumption that sufficient comparable opportunities exist if at least 50% of the comparable hard units in the PHA's portfolio, including PBV developments using the PHA's subsidy, are outside areas of minority concentration.[53] The PHA's portfolio includes all public housing, PBV and PBRA hard units (including those developed under HOPE VI or Choice Neighborhoods) controlled by the PHA and its instrumentalities or funded using PHA-controlled subsidy. Upon adequate documentation of this presumption, the PHA need not provide additional documentation for HUD's front-end review of the sufficient comparable opportunities exception. This presumption may be rebutted by information to the contrary, including information regarding the preceding factors. In assessing whether sufficient comparable opportunities exist when the presumption does not apply, HUD will consider the factors listed above.

Absent information to the contrary, for purposes of HUD's front-end review of the PHA's analysis, HUD will apply a presumption that sufficient comparable opportunities exist if a set of RAD conversions from a single public housing property, individually or in a combination of transactions, will result in the creation of as many similarly-affordable housing units outside areas of minority concentration as are constructed on the original public housing site. To evaluate the creation of similarly-affordable units, HUD will compare (i) the number of affordable units that will be redeveloped on site, to (ii) the number of similarly-affordable housing units that will be created through new construction, imposition of new long-term affordability restrictions or transfer of RAD assistance to one or more sites outside areas of minority concentration.[54] Similarly-affordable shall mean RAD units compared to RAD units and LIHTC/non-RAD units compared to LIHTC/non-RAD units. The newly created similarly-affordable units must be owned, controlled, sponsored, under common ownership, control or sponsorship, or financially supported by the PHA or by an entity with a managing ownership interest in the Project Owner. When a PHA seeks to claim this exception, HUD prefers that the transaction creating the similarly-affordable units on the site outside areas of minority concentration close (with an immediate or delayed HAP effective date, if applicable) prior to the closing of the RAD conversion in the area of minority concentration. However, if the PHA determines that such a sequence is not reasonably possible, unless otherwise approved by HUD the PHA must provide evidence to HUD that the transfer of assistance to a site outside areas of

[53] When determining the percentage of units outside of areas of minority concentration, the PHA must include the number of units planned at the proposed site in its calculations. While not required, PHAs or Project Owners may assist HUD in consideration of this presumption by submitting to HUD a map produced by the Affirmatively Furthering Fair Housing Data and Mapping Tool ("AFFH-T"), as may be available on the HUD website from time to time, showing the location of publicly assisted housing.

[54] For example, if the PHA proposes to build 25 RAD units, 20 non-RAD LIHTC units and 15 unrestricted units on-site, such a plan could be acceptable if paired with creation of 15 RAD units at one site and 10 RAD units plus 20 non-RAD LIHTC units at a second site. The 15 unrestricted units in the minority concentrated area are not part of the analysis as they are not affordable units.

minority concentration is highly likely to occur and the PHA must contractually agree with HUD to create such units. Evidence that the transfer is highly likely to occur must include:

- The project name and property address of the site of the similarly-affordable units to be created,
- The census tract and data to confirm that it is not in an area of minority concentration,
- Evidence of site control,
- Evidence of zoning to permit construction of the similarly-affordable units if the affordable units are to be created through new construction,
- A reasonable and feasible sources and uses statement for the transaction, and
- Evidence of financing commitments exceeding 90% of the necessary sources to complete the transaction. Evidence of financing commitments must include an LIHTC allocation if the use of LIHTCs is projected.

D) The Overriding Housing Needs Exception

As noted in Section 5.4(A), the second exception under which the site and neighborhood standards permit new construction in areas of minority concentration is if the project is necessary to meet overriding housing needs that cannot be met in that housing market area. The new construction site selection standards under RAD[55] outline two examples of circumstances, consistent with fair housing and other civil rights objectives, that would permit the application of the overriding housing needs exception: (1) when the site is "an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood;" or (2) when the site is "located in a neighborhood experiencing significant private investment that is demonstrably improving the economic character of the area (a "revitalizing area")."[56]

(1) Establishing that a Site is an Integral Part of an Overall Local Strategy for the Preservation or Restoration of the Immediate Neighborhood

To establish that a site is an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood, a PHA must document that the locality has a demonstrated commitment to revitalization that includes or is in addition to the RAD conversion, as demonstrated by the following:

i. The site is located in a defined geographic area that is the subject of an official, currently operational and realistically achievable plan for the improvement or revitalization of the immediate neighborhood (which plan may include areas beyond the immediate neighborhood); and
ii. The Covered Project conforms to, and the site is integral to, the goals, strategies, and objectives of the improvement or revitalization plan.

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[55] *See* 24 C.F.R. § 983.57(e)(2) for PBV transactions and paragraph (e) of Appendix III of the RAD Notice for PBRA transactions.

[56] 24 C.F.R. § 983.57(e)(3)(vi); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(viii)(2). In demonstrating an overriding housing need, the "neighborhood" is determined in each situation based on the overall facts and circumstances and cannot be mechanically determined. The "immediate neighborhood" is generally a smaller geographic area than the "neighborhood."

In determining whether such an official, currently operational and realistically achievable plan for the improvement or revitalization of the area exists, HUD will consider relevant factors including, for example, whether:

- The strategy itself, or a plan supporting the strategy, has been enacted, adopted, or ratified by a municipal, county, or state legislative body;
- There has been progress to implement the plan, or the strategy as a whole.[57]
- The plan or strategy as a whole, or the elements applicable to the Covered Project, are consistent with the jurisdiction's land use or zoning code, development regulations, or other official body of laws or rules;
- Strategies or activities under the plan are incorporated in current public, quasi-public agency or major institutional work plans;
- The plan, or the strategy as a whole, includes objectives and initiatives related to the preservation or restoration of a geography larger than the Converting Project and any associated public housing site;
- A jurisdiction has published solicitations or incentives for development projects in the improvement or revitalization area;
- The plan is incorporated in the applicable jurisdiction's Consolidated Plan or other comprehensive community development plan;
- A jurisdiction has explicitly designated the geographic area for improvement or revitalization (e.g., Business Improvement District; Enterprise Zone designation; Promise Zone designation; Choice Neighborhoods designation);
- An implementing agency has retained a construction firm to break ground on the improvement or revitalization; and/or
- An implementing agency has secured financing, such as the issuance of bonds or final approval for tax increment financing.

(2) Establishing that the Site is Located in a "Revitalizing Area"

Evidence that the site is located in a revitalizing area experiencing significant private investment that is demonstrably improving the economic character of the area is also an example of a site which meets an overriding housing need. HUD will consider all relevant factors in making a determination that the site is located in a "revitalizing area" but in particular will consider whether:

i. The neighborhood has demonstrated signs of revitalization, through indicators such as low or declining census tract poverty rates, low or declining violent crime rates or evidence of high or increased educational opportunity, high or increasing median

[57] Indicators of progress should be appropriate to the amount of time since the plan or strategy was developed and there must be a reasonable, supportable expectation that the plan will continue to be implemented. For example, if a plan was launched 3-4 years prior and the initial steps of the plan required implementation of an initiative (such as real estate development) which has a long pre-development planning period, HUD may consider whether there has been activity to seek land development approvals or to develop construction drawings or to secure funding commitments or other activities providing evidence that one or more material elements of the plan or strategy are actually being implemented.

household income, high or increasing homeownership rates and/or high or increased employment; and

ii. There is high private and public investment in retail, commercial, or housing development that has occurred or will imminently occur in the area which may include, among other considerations:
   - Evidence of new or improved retail centers, grocery stores, pharmacies, healthcare facilities, community centers, educational and recreational facilities, municipal services, and transportation serving the neighborhood;
   - Evidence of private and public investment or housing development that has occurred or will imminently occur in the area;
   - Evidence of economic conditions that are impacting the preservation of affordable housing in the neighborhood, including indicators of gentrification such as housing costs rising more sharply in the neighborhood than in the jurisdiction overall, accelerated rates of homeownership in the neighborhood, and disproportionate depletion of larger dwellings for families with children.

(3) Circumstances in Which an Overriding Housing Needs Exception Does Not Apply

A PHA cannot establish that a site meets the overriding housing needs exception if the only reason the need cannot otherwise be feasibly met is that discrimination on the basis of race, color, religion, sex, national origin, age, familial status, or disability renders sites outside areas of minority concentration unavailable or if the use of this standard in recent years has had the effect of circumventing the obligation to provide housing choice.[58] For example, the overriding housing needs exception may not be applied if the reason that the project cannot be sited outside of an area of minority concentration is due to community opposition to the project based on the actual or perceived protected characteristics of the residents or prospective residents of the project. In addition, a recipient may not exclusively rely on this exception as a means of siting projects without creating housing opportunities outside of areas of minority concentration or without preserving existing housing outside of areas of minority concentration.

5.5. Front-End Civil Rights Review for RAD Transactions Involving Transfer of Assistance

A) Applicable Standards

Transfers of assistance are subject to the site selection standards for existing or rehabilitated housing set forth in 24 C.F.R. § 983.57(a)-(d), with the exception of 24 C.F.R. § 983.57(b)(1) and (c)(2), for PBV conversions and Appendix III of the RAD Notice for PBRA conversions. All transfers of assistance to a new site(s) are subject to front-end review by HUD, as required by the RAD Notice and noted in Section 5.3(A)(2) of this Notice. Conversions involving a transfer of assistance may also involve one or more of the other activities which trigger front-end review as described in Section 5.3(A). In transfers of assistance involving any of these activities, HUD

[58] 24 C.F.R. § 983.57(e)(3)(vi) and Appendix III of the RAD Notice, paragraph (e)(2). The PBRA site and neighborhood standards use the phrase "on the basis of race, color, creed, sex or national origin." See Appendix III of the RAD Notice.

will conduct a front-end review based on the requirements applicable to each activity. A PHA must submit documentation for the front-end civil rights review of each specific activity as required by the relevant sections of this Notice.

B) Analysis of Transfers of Assistance

Through the front-end review of transfers of assistance by FHEO, HUD seeks to assist the PHA in avoiding discrimination on the basis of race, color, national origin, religion, sex, disability or familial status. The front-end review of transfers of assistance will apply the site selection standards for existing/rehabilitated housing.[59] This review shall consider:

(1) The accessibility of the proposed site for persons with disabilities;

(2) The ability of the RAD conversion to remediate accessibility concerns;

(3) Whether the transfer of assistance would result in assisted units being located in an area where the total percentage of minority persons is significantly higher than the total percentage of minority persons in the area of the original public housing site or in an area where the percentage of persons of a particular racial or ethnic minority is significantly higher than the percentage of that minority group in the area of the original public housing site.[60] For purposes of this analysis, HUD will examine the minority concentration of:

(a) the census tract of the original public housing site compared to the census tract of the proposed site; and
(b) an area comprised of the census tract of the original public housing site together with all adjacent census tracts compared to an area comprised of the census tract of the proposed site together with all adjacent census tracts.

(4) Whether the site selection has the purpose or effect of:

(a) Excluding individuals from, denying them the benefits of, or subjecting them to discrimination under the RAD program or the applicable rental assistance program;
(b) Excluding qualified individuals with disabilities from or denying them the benefit of the RAD program or the applicable rental assistance program, or otherwise subjecting them to discrimination;
(c) Defeating or substantially impairing the accomplishment of the objectives of the RAD program or the applicable rental assistance program with respect to qualified individuals with disabilities; and

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[59] 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, paragraphs (a) through (d). The site selection standards for existing/rehabilitated housing do not apply the minority concentration test used for new construction found at 24 C.F.R. § 983.57(e)(3) and Appendix III of the RAD Notice, paragraph (e).

[60] While this review is not explicitly called out in 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, it is derived from HUD's and the PHA's obligations to comply with civil rights laws and regulations, including those referenced in 24 C.F.R. § 983.57(b)(2) and Appendix III of the RAD Notice.

(d) Excluding individuals with disabilities (including members of the public with disabilities), denying them benefits or subjecting them to discrimination.

Under the RAD Notice, there are other standards for review of a transfer of assistance which are not examined as part of the front-end civil rights review but are examined as part of the RAD Financing Plan review (e.g., criteria formulated for transfers under Section 8(bb) of the United States Housing Act of 1937 regarding neighborhoods with highly concentrated poverty). Identification of considerations for the front-end review do not preclude review by HUD of all standards referenced in the RAD Notice.

5.6. Front-End Civil Rights Review for RAD Transactions Involving Reduction in Number of Units, Changes in Bedroom Distribution of Units and Changes in Occupancy Requirements

The RAD Notice allows PHAs to reduce the number of units, change the bedroom distribution of units, or change the occupancy of projects as part of their RAD conversion.[61] However, the RAD Notice also provides that such changes (including de minimis changes) must undergo a front-end civil rights review and receive approval from HUD prior to submission of the Financing Plan. The Checklist will require data for review along with an explanation, backed by sufficient evidence, of how the PHA determined that that the proposed change will not result in discrimination on the basis of race, color, national origin, religion, sex, disability, familial status, actual or perceived sexual orientation, gender identity or marital status.[62]

A) Review of Reductions in the Number of Units, Reductions or Increases in the Number of UFAS Accessible Units or Changes in Bedroom Distribution

This Section describes the considerations relevant to a front-end review of reductions in units, changes in the number of UFAS accessible units or changes in bedroom distribution. Such changes must not be the result of an intentional effort to discriminate against members of a protected class. For example, reductions or changes, including reductions in UFAS accessible units or which would impede residents with disabilities from having live-in aides, that intended to exclude persons with disabilities would be unlawful discrimination because of a disability.

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[61] *See* Sections 1.4.A.4 and 1.4.A.10 of the RAD Notice.

[62] Reductions in the number of units, changes in the bedroom distribution of units, or changes in occupancy violate the Fair Housing Act (the Act) if they have a discriminatory effect on the basis of race, color, national origin, religion, sex, disability, or familial status. Unlawful housing discrimination may be established by a policy's or practice's discriminatory intent or by its discriminatory effect, even if not motivated by discriminatory intent, consistent with the standards outlined in 24 C.F.R. § 100.500. A policy or practice can have an unjustified discriminatory effect, even when the provider had no intent to discriminate. Under this standard, a facially-neutral policy or practice that has a discriminatory effect violates the Act if it is not supported by a legally sufficient justification. In addition, the policy or practice violates the Act if the housing developer or provider intentionally discriminates, including for example, by reducing the number of bedrooms with the intent of limiting families with children. Furthermore, the policy or practice may also violate the Act where it creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin. In addition, any changes must conform with the Equal Access rule requirement that determinations of eligibility for housing that is assisted by HUD or subject to a mortgage insured by the FHA shall be made in accordance with program eligibility requirements, and the housing must be made available, without regard to actual or perceived sexual orientation, gender identity or marital status. 24 C.F.R. § 5.105(a)(2).

Similarly, replacing larger units with smaller units so as to exclude families with children would be unlawful discrimination because of familial status.

Additionally, reductions in units or changes in bedroom distribution must not have an unjustified discriminatory effect on members of a protected class. For example, a reduction in units could have a discriminatory impact if it excludes members of a particular race or religion. Reductions or changes that have a disparate impact on a protected class are unlawful under the Fair Housing Act if they are not necessary to achieve a substantial, legitimate, nondiscriminatory interest of the developer or housing provider, or if such interest could be served by another practice that has a less discriminatory effect.

The RAD Notice allows for a de minimis reduction in units at Converting Projects, which includes both a small number of units as well as the reduction of certain units that have been vacant for 24 months prior to application, that are being or will be used for social service delivery, or efficiencies that will be reconfigured to one-bedroom units.[63] In addition, a PHA converting multiple properties can consolidate the de minimis reductions derived from multiple properties at a small number of sites. The RAD Notice also allows for changes in bedroom distribution. Such de minimis reductions are still subject to front end civil rights review and applicable fair housing and civil rights laws.

HUD shall conduct a front-end civil rights review if the plan for a Converting Project results in:

- A reduction in the number of dwelling units in any of the following categories: (i) units with two bedrooms, (ii) units with three bedrooms or (iii) units with four or more bedrooms.
- A reduction in the number of UFAS accessible units;
- An increase in the number of UFAS accessible units for persons with mobility impairments beyond 10% of the units in the Covered Project or 1 unit, whichever is greater.
- An increase in the number of UFAS accessible units for persons with vision and hearing impairments beyond 4% of the units in the Covered Project or 1 unit, whichever is greater.

When a Converting Project is subject to a front-end civil rights review under this subsection, the PHA shall submit to HUD the relevant part of the Checklist together with a justification which must demonstrate that the changes are not the result of discriminatory intent and will not have a discriminatory effect on members of protected classes, particularly families with children and individuals with disabilities. Relevant data for this analysis of the proposed change at the project may include the PHA's overall affordable housing stock, the demand for affordable housing in the market as evidenced by information such as the overall jurisdiction and regional demographic data available from the AFFH Data and Mapping Tool (e.g., both basic demographic and disproportionate housing needs data), the PHA's waiting list or a reliable market study of households seeking assisted housing, compared to the relative proportions of

[63] *See* Section 1.4.A.4 of the RAD Notice.

units serving any particular household type in the proposed project, the PHA's total housing stock or all assisted housing in the area.

For any increase in UFAS units subject to front-end review, HUD will assess indicators of local need (see Section 5.7(B), below) and whether the change would operate to concentrate individuals with disabilities in a particular property or to exclude individuals with certain types of disabilities from a particular property.

B) Review of Changes in Occupancy Type

RAD conversions that result in the implementation of an admissions preference (e.g., residency preferences or restrictions) at the Covered Project that would alter the occupancy of the property (e.g., family units converting to elderly units, elderly/disabled units converting to elderly only units) are subject to a front-end civil rights review by HUD pursuant to the RAD Notice and Section 5.3(A). A PHA must demonstrate that the proposed change in occupancy type is consistent with the demand for affordable housing in its jurisdiction as demonstrated by factors such as the demographics of its current occupancy, the demographics of its waiting list or a market study. Such preferences, restrictions, or geographic residency preferences must be reflected in a PBRA project's Affirmative Fair Housing Marketing Plan (AFHMP) or, for a PBV project, the PHA's Administrative Plan.

5.7. Other Front-End Civil Rights Review for RAD Transactions

A) Conversions of Assistance in Which the Construction Schedule Indicates that Relocation is Likely to Exceed 12 Months.

The front end civil rights review shall focus on whether the relocation will result in discrimination on the basis of race, color, national origin, religion, sex, disability, and familial status, based primarily, but not exclusively, on the data required in the Checklist.

B) Conversions of Assistance Involving New Construction or Substantial Alteration, as those terms are defined by Section 504.

While the PHA is responsible for compliance with all requirements described in Section 4, above and in this subsection, the front-end review will be conducted based on a review of the Checklist and shall include confirming the provision of any required accessible units and confirming the PHA is applying the appropriate accessibility standards. HUD will require the PHA to provide information regarding the provision of at least the minimum number of units accessible for persons with mobility impairments and units accessible for persons with hearing and vision impairments as required by applicable law (generally 5% of units accessible for persons with mobility impairments and an additional 2% of units accessible for persons with hearing and vision impairments). For purposes of establishing an upper threshold of accessible units below which RAD front-end review will not be required, HUD will accept that up to 10% of units accessible for persons with mobility impairments and up to 4% of units accessible for persons with hearing and vision impairments is consistent with local need, without further review, absent information to the contrary. HUD will consider a PHA's request for higher percentages based, to HUD's satisfaction, on reliable indicators of local need, such as census data or other available current data. HUD is available to assist PHAs in determining appropriate indicators of local

need for units with accessible features. The RAD conversion scope of work submitted with the Financing Plan must reflect the construction or retrofitting of residential units and public and common use areas to comply with all applicable accessibility requirements.

C) Remedial Agreements and Orders.

Front-end review in situations where the Converting Project or PHA is subject to enforcement actions or binding voluntary compliance agreements, settlement agreements, conciliation agreements, or consent decrees or orders of the nature described in Sections 5.3(A)(8) and 5.3(A)(9) shall be conducted on a case-by-case basis as appropriate to the specific situation.

5.8. Affirmative Fair Housing Marketing Plan (AFHMP) Requirements for Projects Converting to PBRA Assistance

For all projects converting to PBRA assistance, a PHA or Project Owner must complete form HUD-935.2A, the Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing, and submit it to HUD for approval with the RAD Financing Plan.[64] Affirmative Fair Housing Marketing requirements are designed to achieve a condition in which individuals of similar income levels in the same housing market area have similar housing choices available to them regardless of their race, color, national origin, religion, sex, disability, or familial status.[65] They are also a means to carry out the mandate of Section 808(e)(5) of the Fair Housing Act that HUD administer its programs and activities in a manner to affirmatively further fair housing. These requirements mandate that PHAs or Project Owners identify groups that are least likely to apply for upcoming housing opportunities and to implement special marketing and outreach activities to ensure that these groups are aware of these opportunities.

The AFHMP must be submitted to HUD with the Financing Plan. A separate AFHMP is required for each distinct PBRA HAP contract. The PHA must submit an AFHMP even if the project has an existing waiting list and is not accepting new applicants. The PHA or Project Owner should consult the instructions in the form HUD 935.2A and HUD's Implementing Affirmative Fair Housing Marketing Requirements Handbook (HUD Handbook 8025.1) for guidance on completing the AFHMP and carrying out an affirmative marketing program. The Handbook provides a detailed resource on the content of the AFHMP, which includes marketing activities, residency preferences, and staff training.

When submitting an AFHMP for HUD approval, the PHA or Project Owner must ensure that the occupancy designation and any residency preferences are consistent with the PHA Plan or Significant Amendment to the PHA Plan, that such designation and preferences are consistent with the Checklist submitted to HUD and that the AFHMP includes affirmative marketing

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[64] The most recent version of the AFHMP is HUD Form 935.2A, OMB Approval Number 2529-0013. *See* 24 C.F.R. § 880.601(a)(2) and 24 C.F.R. § 200.615; *see also* Section 10.8 of the Multifamily Accelerated Processing (MAP) Guide. The PHA or its management agent should consult the instructions in the form HUD 935.2A and HUD's Implementing Affirmative Fair Housing Marketing Requirements Handbook (HUD Handbook 8025.1) for guidance on completing the AFHMP and carrying out an affirmative marketing program. The Handbook provides a detailed resource on the content of the AFHMP, which includes marketing activities, residency preferences, and staff training.

[65] *See* 24 C.F.R. § 200.610.

activities that are consistent with its occupancy designation and the populations identified as least likely to apply. Any subsequent changes to occupancy designation or residency preferences shall be proposed, submitted and reviewed in accordance with standard PBRA requirements. If a PHA or Project Owner plans to adopt any local or residency preferences, the Project Owner must submit its Tenant Selection Plan along with the AFHMP (see HUD Handbook 4350.3, page 4-4).

The Multifamily Housing Office of Asset Management and Portfolio Oversight and the Office of Fair Housing and Equal Opportunity ("FHEO") review the AFHMP. FHEO issues HUD's official letter of approval or disapproval. Disapproval letters will specify the reason a plan was rejected and the revisions required. The PHA or Project Owner must make the required changes and resubmit a corrected plan to HUD for approval.

The PBRA contract becomes effective on the first day of a month, following closing. Approval of the AFHMP is not a condition to closing of the RAD conversion. When the project is preparing to accept applications, it must follow its approved AFHMP to ensure that groups least likely to apply are aware of the housing opportunities. The Project Owner is responsible for ensuring that the AFHMP is in place throughout the life of any FHA mortgage or PBRA contract. The Project Owner may not market or lease any unit not occupied by a household exercising its right to remain in or return to the Covered Project prior to approval of the AFHMP. Marketing or leasing includes the solicitation, distribution or acceptance of applications or development of a waiting list.

SECTION 6. RELOCATION REQUIREMENTS

In some cases, as explained in this Section, the activities associated with the RAD transaction may require the relocation of residents. In the event of acquisition, demolition, construction or rehabilitation activities performed in connection with a RAD conversion, the PHA and/or Project Owner[66] should plan such activities to reasonably minimize any disruption to residents' lives, to ensure that residents are not exposed to unsafe living conditions and to comply with applicable relocation, fair housing and civil rights requirements. As discussed in Section 6.1, below, a written relocation plan is required in some circumstances and strongly encouraged for any conversion resulting in resident moves or relocation. Further, the obligations due to relocating residents under RAD are broader than URA relocation assistance and payments and RAD specifies requirements which are more protective of residents than standard URA requirements, including additional notices (see Section 6.6) and a right to return (see Section 6.2). This Notice requires that certain information be provided to all households, beginning prior to submission of the RAD application.

Any resident who moves as a direct result of acquisition, rehabilitation or demolition for an activity or series of activities associated with a RAD conversion may, depending on the circumstances and length of time of the relocation, be eligible for relocation assistance and payments under the URA. Additionally, Section 104(d) relocation and one-for-one replacement

[66] Under the URA, the term "displacing agency" refers to the agency or person that carries out a program or project which will cause a resident to become a displaced person. Projects vary and, for any specific task described in this Notice, the displacing agency may be either the PHA or the Project Owner, as determined by the allocation of roles and responsibilities between the PHA and Project Owner.

housing requirements may also apply when CDBG- or HOME-funds are used in connection with a RAD conversion. The applicability of the URA or Section 104(d) to RAD conversions is fact-specific, which must be determined in accordance with the applicable URA and Section 104(d) regulations.[67]

Eligibility for specific protections under this Notice applies to any person residing in a Converting Project who is legally on the public housing lease, has submitted an application to be added to an existing lease, or is otherwise in lawful occupancy at the time of the issuance of the CHAP and at any time thereafter until conversion of assistance under RAD. All such residents of a Converting Project have a right to return and are eligible for relocation protections and assistance as provided by this Notice. The eligibility criteria set forth in this paragraph apply to the protections under this Notice regardless of whether residents or household members meet the statutory and regulatory requirements for eligibility under URA.[68]

6.1. Planning

If there is a possibility that residents will be relocated as a result of acquisition, demolition, or rehabilitation for a Converting Project, PHAs must undertake a planning process in conformance with the URA statutory and regulatory requirements in order to minimize the adverse impact of relocation (*see* 49 § C.F.R. 24.205). PHAs must also ensure that their relocation planning is conducted in compliance with applicable fair housing and civil rights requirements.

The PHA shall prepare a written relocation plan if the RAD conversion involves permanent relocation (including, without limitation, a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than one year. While a written relocation plan is not required for temporary relocation lasting one year or less, HUD strongly encourages PHAs, in consultation with any applicable Project Owners, to prepare a written relocation plan for all RAD conversions to establish their relocation process clearly and in sufficient detail to permit consistent implementation of the relocation process and accurate communication to the residents. Appendix II contains recommended elements of a relocation plan.

During the planning stages of a RAD transaction and based on the results of this planning process, a PHA must submit applicable portions of the Checklist described in Section 5.3(B) to HUD, together with any required backup documentation, as early as possible once the information covered in the applicable part is known.[69] All parts of the Checklist must be submitted to HUD prior to submission of the Financing Plan. The Checklist will allow HUD to assist the PHA to comply, and to evaluate the PHA's compliance, with relocation requirements, including civil rights requirements related to relocation.

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[67] 42 U.S.C. § 4601 *et seq*., 42 U.S.C. § 5304(d), and their implementing regulations at 49 C.F.R Part 24 and 24 C.F.R. Part 42 subpart C.

[68] A nonexclusive listing of persons who do not qualify as displaced persons under URA is at 49 C.F.R. 24.2(a)(9)(ii). See also, Paragraph 1-4(J) of HUD Handbook 1378. See Section 6.5 of this Notice for discussion of the date of "initiation of negotiations."

[69] The Checklist refers to the existing FHEO Accessibility and Relocation Checklist until a revised Checklist is approved for use pursuant to the Paperwork Reduction Act.

The following presents a general sequencing of relocation planning activities within the RAD conversion process for informational and planning purposes only. Specific requirements are set forth in the provisions of this Notice.

Stage	Activities
1. Prior to submission of RAD application	• Determine potential need for relocation in connection with proposed conversion plans. • Meet with residents to discuss proposed conversion plans, communicate right to return, and solicit feedback. • Provide the *RAD Information Notice* (RIN) to residents as described in Section 6.6(A) of this Notice.
2. After submission of RAD application	• Assess the need for relocation planning in connection with proposed conversion plans. Determine if technical assistance would be beneficial to ensuring compliance with relocation requirements. • Survey residents to inform relocation planning and relocation process. • Develop a relocation plan (see Appendix II for recommended content). • Prepare Significant Amendment to PHA Plan and engage with the Resident Advisory Board, residents and the public regarding Plan amendment.[70]
3. Following issuance of the CHAP, or earlier if warranted	• Provide the *General Information Notice* (GIN) to residents when the project involves acquisition, rehabilitation, or demolition as described in Section 6.6(B) of this Notice and relocation may be required.
4. While preparing Financing Plan	• Discuss the outlines of the conversion plans and their impact on relocation with the HUD transaction manager. • Refine the plan for relocation and integrate the construction schedule into the relocation strategy; seek to minimize off-site or disruptive relocation activities. • Identify relocation housing options . • Budget for relocation expenses and for compliance with accessibility requirements. • Submit the Checklist and, where applicable, the relocation plan. • If the conversion involves acquisition, at the discretion of the Project Owner issue Notice of Intent to Acquire (NOIA). • If a NOIA is issued, at the discretion of the Project Owner provide residents with appropriate relocation notices as

[70] Alternatively, the PHA may submit a new PHA Five-Year or Annual Plan, especially if it is on schedule to do so. Under any scenario, the PHA must consult with the Resident Advisory Board and undertake the community participation process.

Stage	Activities
	described in Section 6.6(C) through 6.6(E) of this Notice at this time.
5. From RAD Conversion Commitment (RCC) to Closing	• Meet with residents to describe approved conversion plans and discuss required relocation. • The effective date of the RCC marks the date of "Initiation of Negotiations" (ION), as defined in the URA (49 § C.F.R. 24.2(a)(15)). • If no NOIA was provided while preparing the Financing Plan, provide residents with appropriate relocation notices as described in Section 6.6(C) through 6.6(E) of this Notice. • Resident relocation may begin following the effective date of the RCC, subject to applicable notice requirements.
6. Post-Closing	• Ongoing implementation of relocation • Notify the residents regarding return to the Covered Project as described in Section 6.6(F) of this Notice • Implementation of the residents' right to return

6.2. Resident Right to Return

Any public housing or Section 8 assisted resident that may need to be relocated temporarily to facilitate rehabilitation or construction has a right to return to an assisted unit at the Covered Project once rehabilitation or construction is complete.[71] Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a project's conversion of assistance. The Project Owner satisfies the RAD right to return to a Covered Project if the Project Owner offers the resident household either: a) a unit in the Covered Project in which the household is not under-housed; or b) a unit in the Covered Project which provides the same major features as the resident's unit in the Converting Project prior to the implementation of the RAD conversion. In the case of a transfer of assistance to a new site, residents of the Converting Project have the right to reside in an assisted unit meeting the requirements set forth in this paragraph at the Covered Project (the new site) once the Covered Project is ready for occupancy in accordance with applicable PBV or PBRA requirements.

If proposed plans for a Converting Project would preclude a resident from returning to the Covered Project, the resident must be given an opportunity to comment and/or object to such plans. Examples of project plans that may preclude a resident from returning to the Covered Project include, but are not limited to:

- Changes in bedroom distribution which decrease the size of units such that the resident would be under-housed;[72]

[71] The right to return is not a right to any specific unit in the Covered Project. Tenancies other than public housing or Section 8 assisted residents (such as commercial tenants) do not hold a right to return and are subject to standard relocation requirements applicable to such tenants under the URA.

[72] See the RAD Notice for a description of the procedures that must be undertaken if a resident is over-housed.

- Where a) the PHA is reducing the number of assisted units at a property (if authorized to do so under Section 1.5.B of the RAD Notice) and b) the resident cannot be accommodated in the remaining assisted units;
- The imposition of income eligibility requirements, such as those associated with LIHTC or other program financing, under which the current resident may not be eligible;[73] and
- Failure to provide reasonable accommodation to an individual with disabilities, in violation of applicable law, which reasonable accommodation may include installation of accessibility features that are needed by the individual with disabilities.[74]

If the resident who would be precluded from returning to the Covered Project objects to such plans, the PHA must alter the project plans to accommodate the resident's right to return to the Covered Project.

If the resident who would be precluded from returning to the Covered Project prefers to voluntarily and permanently relocate rather than object to the project plans, the PHA must secure informed, written consent to a voluntary permanent relocation in lieu of returning to the Covered Project and must otherwise comply with all the provisions of Section 6.10, below, regarding alternative housing options. The PHA cannot employ any tactics to pressure residents into relinquishing their right to return or accepting alternative housing options. A PHA may not terminate a resident's lease if the PHA fails to obtain the resident's consent and the resident seeks to exercise the right to return.

In the case of a multi-phase transaction, the resident has a right to return to the Covered Project or to other converted phases of the property which have converted and are available for occupancy at the time the resident is eligible to exercise the right to return. A relocated resident should get the benefit of improvements facilitated by the resident's relocation and conversion and completion of future phases cannot be assured. In most cases, this means that the resident's right to return must be accommodated within the Covered Project associated with resident's original unit. However, in those cases where improvements to multiple phases of a site are occurring simultaneously, the PHA or Project Owner may treat multiple Covered Projects on the same site as one for purposes of the right to return. If the PHA or Project Owner seeks to have the resident exercise the right of return at a future phase, the PHA or Project Owner would need to secure the resident's consent to such plan as an alternative housing option pursuant to Section 6.10, below.

In implementing the right of return, the Project Owner shall comply with all applicable fair housing laws and implementing regulations, including, but not limited to, the Fair Housing Act,

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[73] In these cases, a PHA may elect to exclude some units from the applicable financing program, for example, claiming LIHTC for a subset of the units and not claiming tax credits in connection with the units occupied by households over the LIHTC maximum eligibility of 60% of AMI.

[74] Refer to the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Reasonable Modifications Under the Fair Housing Act (March 5, 2008), at http://www.hud.gov/offices/fheo/disabilities/reasonable_modifications_mar08.pdf for additional detail regarding applicable standards for reasonable accommodations and accessibility features which must be provided. If the resident has paid for installation of accessibility features in the resident's prior unit, the PHA or Project Owner shall pay for the installation of comparable features in the new unit. Violations of law may also result in other sanctions.

Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and Titles II and III of the Americans with Disabilities Act.

6.3. Admissions and Continued Occupancy Requirements

Resident households may not be denied relocation housing or the right to return based on rescreening, income eligibility, or income targeting. PHAs may only offer housing options with screening, income eligibility or income targeting requirements if the impacted residents meet the admission and occupancy policies applicable to such housing. However, whether or not in a temporary relocation situation, the household remains subject to the applicable program policies regarding continued occupancy of an assisted unit by an incumbent resident of the unit.

6.4. Types of Moves and Relocation

Any time project plans require a resident to move from their current unit, the resident is eligible for assistance as described in this Notice. Assistance may vary depending on the options provided to residents, whether the relocation is temporary or permanent and, if applicable, the length of time the resident is in temporary accommodations.[75] In all circumstances, the move or relocation must be in compliance with applicable requirements of this Notice and consistent with applicable fair housing and civil rights requirements. Each type of move is discussed below.

A) Moves within the same building or complex of buildings[76]

Temporary or permanent moves within the same building or complex of buildings may be appropriate given the extent of work to be completed to permit phasing of rehabilitation or construction. Moves within the same building or complex of buildings are not considered relocation under RAD and a tenant generally does not become displaced under the URA. Whether permanent (i.e., the tenant will move to and remain in an alternative unit) or temporary (i.e., the tenant will move to another unit and return to their original unit), the PHA or Project Owner must reimburse residents for all reasonable out-of-pocket expenses incurred in connection with any move and all other terms and conditions of the move(s) must be reasonable.[77] The final move must be to a unit which satisfies the right to return requirements specified in Section 6.2 of this Notice.

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[75] PHAs should note that the definitions of "permanent" vary between the URA and RAD. For example, "permanent displacement" under the URA includes moves from the original building or complex of buildings lasting more than one year. The RAD Notice, meanwhile, considers "permanent relocation" to be separation from the RAD-assisted unit upon completion of the conversion and any associated rehabilitation and construction. The duration of a temporary move may exceed one year. In the case of a transfer of assistance, it is not permanent relocation under RAD when the resident must move from the original complex of buildings to the destination site in order to retain occupancy of the RAD-assisted unit.

[76] An example of relocation within the same building or complex of buildings would be if one floor of a multi-story building is vacant, and the PHA is moving residents from another floor to the vacant units.

[77] Failure to reimburse residents for moving or other out-of-pocket expenses and any other terms and conditions of the move which may be unreasonable may result in the resident becoming a displaced person under the URA if the resident subsequently moves from the property.

B) Temporary relocation lasting one year or less

If a resident is required to relocate temporarily, to a unit not in the same building or complex of buildings, for a period not expected to exceed one year in connection with the RAD conversion, the resident's temporarily occupied housing must be decent, safe, and sanitary and the resident must be reimbursed for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation. These expenses include, but are not limited to, moving expenses, increased housing costs (e.g., rent and utilities), meals if the temporary housing lacks cooking facilities (e.g., during a short hotel stay, whether or not on an emergency basis) and other applicable expenses.[78]

C) Temporary relocation initially expected to last one year or less, but which extends beyond one year

In the event that a resident has been temporarily relocated, to a unit not in the same building or complex of buildings, for a period which was anticipated to last one year or less but the temporary relocation in fact exceeds one year, the resident qualifies as a "displaced person" under the URA and as a result immediately becomes eligible for all permanent relocation assistance and payments as a "displaced person" under the URA, including notice pursuant to Section 6.6(E). This assistance would be in addition to any assistance the person has already received for temporary relocation, and may not be reduced by the amount of any temporary relocation assistance.

In such event, the PHA or Project Owner shall offer the resident the opportunity to choose to voluntarily permanently relocate with the offered URA assistance or to choose to remain temporarily relocated based on updated information from the PHA or Project Owner about when they can return to the completed RAD unit. The PHA or Project Owner must present this opportunity to the resident when the temporary relocation extends beyond one year and each time thereafter that the temporary relocation extends beyond the previously anticipated duration. In presenting such opportunity, the PHA or Project Owner must inform the resident in writing that his or her acceptance of voluntary permanent relocation, with the associated assistance, would terminate the resident's right to return to the Covered Project. The PHA or Project Owner must provide the resident with at least 30 days to decide whether to remain in temporary relocation status or to voluntarily relocate permanently.

D) Temporary relocation anticipated to last more than one year

When the PHA anticipates that the temporary relocation, to a unit not in the same building or complex of buildings, will last more than one year, but the resident is retaining the resident's right to return to the Covered Project, the resident is considered temporarily relocated under RAD and is eligible to receive applicable temporary relocation assistance and payments. Under the URA, the resident becomes eligible to receive applicable relocation assistance and payments as a "displaced person" when the temporary relocation period exceeds one year and each time thereafter that the temporary relocation extends beyond the previously anticipated duration, at

[78] HUD Handbook 1378, Chapter 2, Section 2-7 governs activities subject to URA requirements and informs, but is not binding upon, any RAD activities not governed by the URA. PHAs may also refer to HUD Form 40030.

which time the PHA or Project Owner shall offer the resident the opportunity to choose to voluntarily permanently relocate or to remain temporarily relocated, as described in Section 6.4(C), above.

In order to allow residents to make the election earlier than required under the URA (thereby avoiding a year in temporary relocation housing prior to electing voluntary permanent relocation), if the PHA or Project Owner anticipates that temporary relocation will last more than one year, the PHA or Project Owner shall provide the resident with an initial option to (a) be temporarily relocated, retain the right to return to the Covered Project when a unit becomes available and receive assistance, including temporary housing and reimbursement for all reasonable out-of-pocket expenses associated with the temporary relocation, or (b) accept RAD voluntary permanent relocation assistance and payments equivalent to what a "displaced person" would receive under the URA. The PHA or Project Owner must inform the resident in writing that his or her acceptance of voluntary permanent relocation, with the associated assistance, would terminate the resident's right to return to the Covered Project. The PHA or Project Owner must provide the resident with at least 30 days to decide whether to remain in temporary relocation status or to voluntarily relocate permanently.

E) Permanent moves in connection with a transfer of assistance

In cases solely involving a transfer of assistance to a new site, resident relocation from the Converting Project to the Covered Project is not, by itself, generally considered involuntary permanent relocation under RAD. However, the URA and/or Section 104(d) is likely to apply in most cases. In cases of a transfer of assistance to a new site where it has also been determined that the URA and/or Section 104(d) apply to the transfer of assistance, residents may be eligible for all permanent relocation assistance and payments for eligible displaced persons under the URA and/or Section 104(d). If the URA applies to a move of this type, the PHA or Project Owner must make available at least one, and when possible, three or more comparable replacement dwellings pursuant to 49 C.F.R. § 24.204(a). However, provided the transfer of assistance unit meets the URA definition of a comparable replacement dwelling pursuant to 49 C.F.R. § 24.2(a)(6), that unit could in fact represent the most comparable replacement dwelling as determined by the agency for purposes of calculating a replacement housing payment, if any, under 49 C.F.R. § 24.402.

Whether or not the URA and/or Section 104(d) apply, under RAD the residents are entitled to relocation assistance and payments, including counseling in preparation for the relocation, written notices of the relocation (including a 90-day RAD Notice of Relocation), and reimbursement for all reasonable out-of-pocket expenses, including moving expenses, incurred in connection with the move. It should be noted that the RAD relocation assistance and payments provided to transferring residents in this paragraph differ from those required under the URA and/or Section 104(d) as described above. Where both frameworks apply, the residents must receive the more extensive protections offered under either framework.

If HUD determines that the distance from the Converting Project to the site of the Covered Project is significant and the resident could not reasonably be required to move to the new site, then HUD will require the PHA to adjust project plans to accommodate the resident in an assisted unit (e.g., a public housing unit, some other project-based Section 8 unit or a market unit

with a housing choice voucher) within a reasonable distance of the site of the Converting Project. HUD will evaluate whether this requirement applies on a case by case basis, considering whether the distance would impose a significant burden on residents' access to existing employment, transportation options, schooling or other critical services. Accommodating the resident may also be satisfied by the resident's consent to an alternative housing option pursuant to Section 6.10. The requirement set forth in this paragraph is in addition to all protections, including, for example, the offer of comparable replacement dwellings, which are required in all instances where a transfer of assistance is subject to the URA and/or Section 104(d).

F) Voluntary permanent relocation

A resident may elect to relinquish their right of return and consent to voluntary permanent relocation pursuant to an alternative housing option offered and accepted according to the procedures described in Section 6.10, which Section specifies protections to ensure the resident's decision is fully informed. By selecting voluntary permanent relocation, the resident is electing to receive RAD permanent relocation assistance and payments which are equivalent to the relocation payments and assistance required to be provided to a "displaced person" pursuant to the regulations implementing the URA.

6.5. Initiation of Negotiations (ION) Date

Eligibility for URA relocation assistance is effective on the date of initiation of negotiations (ION) (49 C.F.R. § 24.2(a)(15)). For Converting Projects, the ION date is the effective date of the RCC. The ION date is also typically the date when PHAs can begin to issue RAD Notices of Relocation (except in the case of acquisitions when the PHA can issue a Notice of Intent to Acquire and RAD Notices of Relocation prior to the ION date). Any person who is in lawful occupancy on the ION date is presumed to be entitled to relocation payments and other assistance.

PHAs and Project Owners should note that prior to the ION date, a resident may be eligible as a displaced person for permanent relocation assistance and payments under the URA if HUD determines, after analyzing the facts, that the resident's move was a direct result of the project. However, resident moves taken contrary to specific instructions from the PHA or Project Owner (for example, contrary to instructions not to move if contained in a General Information Notice) are generally not eligible as a displaced person under the URA.

6.6. Resident Relocation Notification (Notices)

PHAs and Project Owners are encouraged to communicate regularly with the residents regarding project plans and, if applicable, the resulting plans for relocation. When residents may be relocated for any time period (including, without limitation, a move in connection with a transfer of assistance), written notice must be provided to the resident heads of households, including the notices listed below as applicable.[79] PHAs and Project Owners are also encouraged to provide

[79] The notices required under Sections 6.6(B) through 6.6(E) must be delivered in accordance with URA resident notification requirements, including the requirement that the notice be personally served or delivered by certified or registered first class mail return receipt requested. All notices must be delivered to each household (i.e., posting in

additional relocation notices and updates for the residents' benefit as appropriate for the specific situation.

To ensure that all residents understand their rights and responsibilities and the assistance available to them, consistent with URA requirements at 49 C.F.R. § 24.5 and civil rights requirements, PHAs and Project Owners must ensure effective communication with individuals with disabilities, including through the provision of appropriate auxiliary aids and services, such as interpreters and alternative format materials. Similarly, PHAs and Project Owners are required to take reasonable steps to ensure meaningful access for LEP persons in written and oral materials. Each notice shall indicate the name and telephone number of a person to contact with questions or for other needed help and shall include the number for the telecommunication device for the deaf (TDD) or other appropriate communication device, if applicable, pursuant to 24 C.F.R. §8.6(a)(2).

The purpose of these notifications is to ensure that residents are informed of their potential rights and, if they are to be relocated, of the relocation assistance available to them. Two initial notices launch this effort and provide critical information regarding residents' rights. The first, the RAD Information Notice, is to be provided at the very beginning of the RAD conversion planning process in order to ensure residents understand their rights, to provide basic program information and to facilitate residents' engagement with the PHA regarding project plans. The GIN, meanwhile, provides information specifically related to protections the URA provides to impacted residents. Subsequent notices provide more detailed information regarding relocation activities specific to the household, including tailored information regarding eligibility and timelines for relocation.

PHAs should note that a resident move undertaken as a direct result of the project may be eligible to receive relocation assistance and payments under the URA even though the PHA has not yet issued notices to them. Sample notices which may be used as-is or modified to fit the peculiarities of each situation are provided on the RAD website at www.hud.gov/rad.

A) RAD Information Notice

The RAD Information Notice is to be provided to residents at the very beginning of the RAD conversion planning process in order to convey general written information on potential project plans and residents' basic rights under RAD, and to facilitate residents' engagement with the PHA regarding the proposed RAD conversion. The PHA shall provide a RAD Information Notice to all residents of a Converting Project prior to the first of the two meetings with residents required by the RAD Notice, Section 1.8.2, and before submitting a RAD Application. This RAD Information Notice shall be provided without regard to whether the PHA anticipates any relocation of residents in connection with the RAD conversion. The RAD Information Notice must do the following:

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common areas is insufficient) and methods of delivery (e.g., certified mail, U.S. mail, or hand delivery) must be documented in the PHA's or Project Owner's files.

- Provide a general description of the conversion transaction (e.g., the Converting Project, whether the PHA anticipates any new construction or transfer of assistance, whether the PHA anticipates partnering with a developer or other entity to implement the transaction);
- Inform the resident that the early conceptual plans are likely to change as the PHA gathers more information, including, among other items, resident opinions, analysis of the capital needs of the property and financing options;
- Inform the resident that the household has a right to remain in the unit or, if any relocation is required, a right to return to an assisted unit in the Covered Project (which may be at the new site in the case of a transfer of assistance);
- Inform the resident that they will not be subject to any rescreening as a result of the conversion;
- Inform the resident that the household cannot be required to move permanently without the resident's consent, except in the case of a transfer of assistance when the resident may be required to move a reasonable distance, as determined by HUD, in order to follow the assisted unit;
- Inform the resident that if any relocation is involved in the transaction, the resident is entitled to relocation protections under the requirements of the RAD program and, in some circumstances, the requirements of the URA, which protections may include advance written notice of any move, advisory services, payment(s) and other assistance as applicable to the situation;
- Inform the resident that any resident-initiated move from the Converting Project could put any future relocation payment(s) and assistance at risk and instruct the resident not to move from the Converting Project; and
- Inform the resident that the RAD transaction will be completed consistent with fair housing and civil rights requirements, and provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

B) General Information Notice (49 C.F.R. § 24.203(a))

The purpose of the General Information Notice (GIN) is to provide information about URA protections to individuals who may be displaced as a result of federally-assisted projects involving acquisition, rehabilitation or demolition. A GIN provides a general description of the project, the activities planned, and the relocation assistance that may become available.

A GIN shall be provided to any person scheduled to be displaced *as soon as feasible* based on the facts of the situation. In certain instances, such as when the PHA knows that a project will involve acquisition, rehabilitation or demolition, "as soon as feasible" may be simultaneous with issuance of the RAD Information Notice. For any RAD conversion involving acquisition, rehabilitation or demolition, "as soon as feasible" shall be no later than 30 days following the issuance of the CHAP. In instances where acquisition, rehabilitation or demolition is not anticipated at the time of the CHAP but project plans change to include such activities, pursuant to this Notice the PHA shall provide the GIN as soon as feasible following the change in project plans.

For RAD, the GIN must do at least the following:

- Inform the resident that he or she may be displaced for the project and generally describe the relocation payment(s) for which the resident may be eligible, the basic conditions of eligibility, and the procedures for obtaining the payment(s);
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she will be given reasonable relocation advisory services, including referrals to replacement properties, help in filing payment claims, and other necessary assistance to help the displaced resident successfully relocate;
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she will not be required to move without 90 days advance written notice;
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she cannot be required to move permanently unless at least one comparable replacement dwelling has been made available;
- Inform the resident that any person who is an alien not lawfully present in the United States is ineligible for relocation advisory services and relocation payments, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child (see 49 C.F.R. § 24.208(h) for additional information);
- Describe the resident's right to appeal the PHA's determination as to a resident's eligibility for URA assistance; and
- Inform the resident that the RAD transaction will be completed consistent with fair housing and civil rights requirements, and provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

Because of the potential confusion caused by evolving policy directions in the RAD program regarding delivery of the GIN, for actions taken prior to the issuance of this Notice, HUD will consider the facts and circumstances of each conversion, with emphasis on the underlying URA requirements, in monitoring and enforcing a PHA's compliance with this requirement.

C) Notice of Intent to Acquire (49 C.F.R. § 24.203(d))

For conversions involving acquisition, the Project Owner (the "acquiring agency") may provide to residents of the Converting Project a Notice of Intent to Acquire (NOIA).[80] The NOIA may be provided no earlier than 90 days prior to the PHA's reasonable estimate of the date of submission of a complete Financing Plan. While eligibility for URA relocation assistance is generally effective on the effective date of the RCC (the ION date), a prior issuance of a NOIA establishes a resident's eligibility for relocation assistance and payments on the date of issuance of the NOIA and prior to the ION date.

D) RAD Notice of Relocation

If a resident will be relocated to facilitate the RAD conversion, the PHA shall provide written notice of such relocation by means of a RAD Notice of Relocation. The RAD Notice of

[80] Acquisition includes a new ownership entity's purchase of the Covered Project from the PHA, such as a purchase by a single purpose entity, an affiliate or a low-income housing tax credit ownership entity.

Relocation may not be issued until: 1) the effective date of the RCC (the ION date) if the conversion does not involve acquisition; or 2) the earlier of the issuance of the Notice of Intent to Acquire (see Section 6.6(C)) or the effective date of the RCC (the ION date) if the conversion involves acquisition. Prior to issuance of the RAD Notice of Relocation, PHAs and Project Owners should meet with each resident household to provide preliminary relocation advisory services and to determine their needs and preferences.[81]

A RAD Notice of Relocation is not required for residents who will not be relocated. As a best practice, PHAs or Project Owners should notify residents that they are not being relocated once that determination has been made if they were previously informed by the GIN and/or by other methods that relocation was a possibility.[82]

A RAD Notice of Relocation shall provide either: 1) 30-days' notice to residents who will be relocated for twelve months or less; or 2) 90-days' notice to residents who will be relocated for more than twelve months.[83] The RAD Notice of Relocation must conform to the following requirements:

(1) The notice must state the anticipated duration of the resident's relocation.

(2) The notice must specify which entity (the PHA or the Project Owner) is primarily responsible for management of the resident's relocation and for compliance with the relocation obligations during different periods of time (i.e., before vs. after Closing).

(3) For residents who will be relocated for twelve months or less:

- The PHA or Project Owner must provide this notice a minimum of 30 days prior to relocation.[84] PHAs or Project Owners may deem it appropriate to provide longer notice periods for persons who will be temporarily relocated

[81] PHAs and Project Owners should note the URA relocation advisory services requirement for personal interviews. *See* Section 6.7 of this Notice. In sequencing the RAD Notice of Relocation, PHAs and Project Owners wishing to offer alternative housing options pursuant to Section 6.10 should also note the additional complexity in the timeline of notices. Pursuant to Section 6.10(D), the resident can consent to an alternative housing option only after issuance of the NOIA or the effective date of the RCC and 30 days after presentation of the alternative housing options. In some cases, for example, when the resident would not otherwise be relocated for over twelve months, the RAD Notice of Relocation must include both the information described in Section 6.6(D)(3) and the information in Section 6.6(D)(4). The PHA or Project Owner should consider discussing the alternative housing options prior to issuing the RAD Notice of Relocation so that the RAD Notice of Relocation can be tailored to the resident's situation.

[82] The RAD program does not require a "notice of non-displacement," which HUD relocation policy generally uses for this purpose.

[83] The 90-day notice is required for residents relocated for more than twelve months, whether or not they intend to return to the Covered Project and whether or not they are eligible for assistance and payments as a displaced person under URA. Recipients of the 90-day notice would include those residents who have voluntarily accepted a permanent relocation option as well as those residents who are relocated within the same building or complex of buildings.

[84] Note that residents may elect to move to the relocation housing before the 30 days have elapsed. However, a PHA may not require a resident to move prior to this time.

for an extended period of time (over 6 months), or if necessary due to personal needs or circumstances.

- The notice must explain that the PHA or Project Owner will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with any temporary move (including, but not limited to, increased housing costs and moving costs).
- The notice must explain the reasonable terms and conditions under which the resident may exercise the right to return to lease and occupy a unit in the Covered Project.

(4) For residents who will be relocated for more than twelve months, including for residents who may wish to voluntarily accept a permanent relocation option:

- The PHA or Project Owner must provide this notice a minimum of 90 days prior to relocation of residents.[85]
- The notice must offer the choice to be temporarily relocated, thereby preserving the resident's right to return, or the choice to be voluntarily permanently relocated pursuant to the procedures set forth in Section 6.10, together with guidance that the resident has at least thirty (30) days to consider the choice.
- For residents who voluntarily elect to be permanently relocated, the 90-day notice period may only begin once the PHA or Project Owner has made available at least one comparable replacement dwelling consistent with 49 C.F.R. § 24.204(a).[86]
- The notice must describe the available relocation assistance, the estimated amount of assistance based on the individual circumstances and needs, and the procedures for obtaining the assistance. The notice must be specific to the resident and his or her situation so that the resident will have a clear understanding of the type and amount of payments and/or other assistance the resident household may be entitled to claim.
- The notice must comply with all requirements for a URA Notice of Relocation Eligibility as described in 49 C.F.R. § 24.203(b).

(5) The notice must inform the resident that the relocation will be completed consistent with fair housing and civil rights requirements, and it must provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

For short-term relocations, the RAD Notice of Relocation may also contain the information required in the Notice of Return to the Covered Project (see Section 6.6(F)).

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[85] Note that residents may elect to move to the relocation housing before the 90 days have elapsed. However, a PHA may not compel a resident to move prior to this time.

[86] PHAs should note that URA regulations also require, where possible, that three or more comparable replacement dwellings be made available before a resident is required to move from his or her unit.

E) URA Notice of Relocation Eligibility – for residents whose temporary relocation exceeds one year (49 C.F.R. § 24.203(b))

After a resident has been temporarily relocated for one year, notwithstanding a prior issuance of a RAD Notice of Relocation, the PHA or Project Owner must provide an additional notice: the notice of relocation eligibility in accordance with URA requirements ("URA Notice of Relocation Eligibility"). The URA Notice of Relocation Eligibility is not required if the resident has already accepted permanent relocation assistance.[87]

The URA Notice of Relocation Eligibility must conform to URA requirements as set forth in 49 C.F.R. part 24 and shall:

- Provide current information as to when it is anticipated that the resident will be able to return to the Covered Project.
- Give the resident the choice to remain temporarily relocated based upon the updated information or to accept permanent URA relocation assistance at that time instead of exercising the right to return at a later time.

If the resident chooses to accept permanent URA relocation assistance and this choice requires the resident to move out of their temporary relocation housing, the URA requires that the PHA or Project Owner make available at least one, and when possible, three or more comparable replacement dwellings pursuant to 49 C.F.R. § 24.204(a), which comparability analysis is in reference to the resident's original unit. The URA further requires that the resident receive 90 days' advance written notice of the earliest date they will be required to move pursuant to 49 C.F.R. § 24.203(c).

[87] To illustrate, consider the following examples.

- Example 1: The household is expected to be relocated for 11 months. The resident would receive a RAD Notice of Relocation offering only temporary relocation. Construction delays result in the extension of the relocation such that, in fact, it exceeds 12 months. When the temporary relocation exceeds 12 months, the resident must receive a URA Notice of Relocation Eligibility offering a choice between continuation in temporary relocation status and permanent relocation.
- Example 2: The household is expected to be relocated for 14 months. The resident would receive a RAD Notice of Relocation offering a choice between temporary relocation status and permanent relocation. If the household elects temporary relocation, the URA Notice of Relocation Eligibility is required as an additional notice following twelve months in temporary relocation status.
- Example 3: The household is expected to be relocated for 14 months. The resident would receive a RAD Notice of Relocation offering a choice between temporary relocation status and permanent relocation. If the household elects permanent relocation, the URA Notice of Relocation Eligibility is not required.
- Example 4: The household can be accommodated with temporary relocation of 3 months, but has been offered and seeks to accept permanent relocation pursuant to an alternative housing option. This resident would receive a RAD Notice of Relocation under Section 6.6(D)(4) offering a choice between temporary relocation status (the default option) and permanent relocation (the alternative housing option), instead of the RAD Notice of Relocation under Section 6.6(D)(3) which would be expected absent a permanent relocation option. The URA Notice of Relocation Eligibility is not required in either case because a temporary relocation exceeding 12 months was never anticipated nor experienced.

F) Notification of Return to the Covered Project

With respect to all temporary relocations, the PHA or Project Owner must notify the resident in writing reasonably in advance of the resident's expected return to the Covered Project, informing the resident of:

- The entity (the PHA or the Project Owner) with primary responsibility for managing the resident's relocation;
- The address of the resident's assigned unit in the Covered Project and, if different from the resident's original unit, information regarding the size and amenities of the unit;
- The date of the resident's return to the Covered Project or, if the precise date is not available, a reasonable estimate of the date which shall be supplemented with reasonable additional notice providing the precise date;
- That the PHA or Project Owner will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with the return relocation; and
- The resident's options and the implications of those options if the resident determines that he or she does not want to return to the Covered Project and wants to decline the right of return.[88]

Reasonable advance notice shall be 15% of the duration of the resident's temporary relocation or 90 days, whichever is less. For short-term relocations, the PHA or Project Owner may include this information within the RAD Notice of Relocation.

6.7. Relocation Advisory Services

Throughout the relocation planning process, the PHA and Project Owner should be in communication with the residents regarding the evolving plans for relocation. Notwithstanding this best practice, certain relocation advisory services, described below, are required by the URA.

The URA regulations require the PHA or Project Owner to carry out a relocation assistance advisory program that includes specific services determined to be appropriate to residential or nonresidential displacements. The specific advisory services to be provided, as determined to be appropriate, are outlined at 49 C.F.R. § 24.205(c). For residential displacement under the URA, a personal interview is required for each displaced resident household to determine the relocation needs and preferences of each resident to be displaced. The resident household shall be provided an explanation of the relocation payments and other assistance for which the resident may be eligible, the related eligibility requirements, and the procedures for obtaining such assistance. Advisory counseling must also inform residents of their fair housing rights and be carried out in

[88] If the resident declines to return to the Covered Project upon completion of the period of temporary relocation, the resident shall be considered to have voluntarily moved out of the property, without the benefit of further relocation assistance. For example, a PHA or Project Owner may have rented a market-rate apartment as a temporary relocation resource for a six-month period. In such a situation, the resident may decline to return to the Covered Project and choose to remain in the market-rate apartment at the expiration of the six-month period, but shall not be eligible for any further relocation assistance and payments (including rent differential payments) under this Notice, the URA or Section 104(d), if applicable, in connection with the resident's decision to remain in the temporary housing and not return to the Covered Project.

a manner that satisfies the requirements of Title VI of the Civil Rights Act of 1964, the Fair Housing Act, and Executive Order 11063 (49 C.F.R. § 24.205(c)(1)).[89] Such advisory services under the URA may include counseling to ensure that residents affected by the project understand their rights and responsibilities and the assistance available to them (49 C.F.R. § 24.205(c)). In addition, the PHA or Project Owner should inform residents that if they believe they have experienced unlawful discrimination, they may contact HUD at 1-800-669-9777 (Voice) or 1-800-927-9275 (TDD) or at http://www.hud.gov.

6.8. Initiation of Relocation

PHAs and Project Owners **may not initiate any involuntary physical relocation until both the RCC is in effect and the applicable RAD Notice of Relocation period has expired** (i.e., after either 30 or 90 days' notice as applicable depending on nature of the relocation, as described above). This prohibition applies to all types of RAD transactions, regardless of whether the RAD Notice of Relocation is provided after issuance of a NOIA (for conversions involving acquisition) or following the effective date of the RCC (for all other conversions). PHAs are advised to account for the required 30-day or 90-day written notice periods in their planning process, to ensure that notices which satisfy all applicable requirements are issued prior to taking any action to initiate relocation.

Neither involuntary nor voluntary relocation for the project shall take place prior to the effective date of the RCC, unless moves are authorized under Section 7, below ("Applicability of HCV and Public Housing Requirements") or unless HUD provides explicit approval which will only be provided in extraordinary circumstances. The PHA must wait until the RAD Notice of Relocation period has expired before it may initiate any involuntary relocation. However, a resident may request to move voluntarily, and the PHA may honor a resident's request to move, before the applicable 30-day or 90-day period has elapsed, provided that the PHA may not take any action to encourage or coerce a resident to make such a request. If a resident has elected an alternative housing option, PHAs are advised to ensure that any consent to voluntary permanent relocation does not expire prior to the date of the relocation, as described in Section 6.10.

HUD may use administrative data to identify and investigate projects where relocation may be occurring prior to RCC.

6.9. Records and Documentation; Resident Log

HUD may request from the PHA or Project Owner written records and documentation in order to evidence the PHA's and/or Project Owner's compliance, as applicable, with this Notice and the URA.[90] HUD may request to review some or all of such records in the event of compliance

[89] For example, under fair housing and civil rights laws, the PHA and Project Owner may be required to inform residents about and provide reasonable accommodations for individuals with disabilities, such as search assistance; take appropriate steps to ensure effective communication with individuals with disabilities, such as through the provision of auxiliary aids and services, such as interpreters and alternate format documents; provide advisory counseling services in accessible locations and in an accessible manner for individuals with disabilities; and take reasonable steps to ensure meaningful access for LEP persons. See Section 4 of this Notice for more information on these requirements.

[90] Chapter 6 of HUD Handbook 1378 includes guidance on URA recordkeeping requirements.

concerns, in the event a project is identified for additional review based on administrative data, in the event of audits for purposes of monitoring the RAD program as a whole, upon selection of a random sample of projects and/or at other times at HUD's sole discretion. The records shall include resident files for all households relocated in connection with RAD and a resident log as described in this Section.

As part of such written record, the PHA or Project Owner must maintain data sufficient to deliver to HUD a resident log of every household that resides at the Converting Project at the time of the first required resident meeting on the proposed conversion pursuant to Section 1.8 of the RAD Notice (the "First Resident Meeting") and of every household that moves into the Converting Project after the First Resident Meeting and before the conversion of assistance under RAD. If any relocation is required, the log shall track resident status through completion of rehabilitation and construction, including re-occupancy after relocation. The resident log must include, but need not be limited to, the following information:

- Name of head of household
- PHA's resident identification number and/or the last four digits of the head-of-household's Social Security Number
- The head of household's race and ethnicity as reported on the HUD Form 50058 or the HUD Form 50058 MTW (the "Form 50058"). For purposes of the resident log, all references to the Form 50058 shall be to the form most recently prepared at the time of the First Resident Meeting or, for residents who moved in after the First Resident Meeting, the form most prepared at the time of the resident's initial occupancy.
- A Yes/No indication if there is any household member reported as having a disability on the Form 50058.
- A Yes/No indication if there is any household member reported as under the age of 18 on the effective date of action of the Form 50058;
- The household's relevant unit address, unit size and household size at the following times:
    - The time of the First Resident Meeting or the time of a resident's initial occupancy if after the First Resident Meeting
    - The time of the issuance of the CHAP or the time of a resident's initial occupancy if after the issuance of the CHAP
    - Proximate and prior to the PHA or Project Owner having authority to initiate involuntary relocation activities (i.e., at the time of issuance of the RCC unless otherwise approved by HUD upon extraordinary circumstances)
    - Completion of the relocation process following construction or rehabilitation and with return of all households exercising the right of return
- The household's residence status at the time of issuance of the RCC (e.g., in residence at the Converting Project, transferred to other public housing, moved out, evicted or other with explanation)
- The household's residence status upon completion of re-occupancy (e.g., in residence at the Covered Project/never relocated, in residence at the Covered Project/temporarily relocated and returned, transferred to other public housing, moved out, evicted, permanently relocated or other with explanation)
- The following dates for each resident household, as applicable:
    - Date of the RAD Information Notice

    - Date of the GIN
    - Date of the CHAP
    - Date of NOIA
    - Date of RAD Notice of Relocation
    - Date of URA Notice of Relocation Eligibility
    - Date of most recent consent to voluntary permanent relocation[91]
    - Date of relocation away from the Converting Project or Covered Project
    - Dates of any intermediate relocation moves
    - Date of return to the Covered Project or to the household's post-closing permanent address.[92]
- The following information for each resident household, as applicable:
    - The type of move (e.g., the types identified in Section 6.4, above)
    - The form of any temporary relocation housing (e.g., hotel, assisted housing, market-rate housing)
    - The address and unit size of any temporary relocation housing
    - Whether alternative housing options were offered consistent with Section 6.10, below
    - Any material terms of any selected alternative housing options
    - The type and amount of any payments for
        - Moving expenses to residents and to third parties
        - Residents' out-of-pocket expenses
        - Rent differential payments or other payments for temporary or permanent rental assistance, together with the rent and utilities (if applicable) that were the basis for the calculations
        - Any other relocation-related compensation or assistance

6.10. Alternative Housing Options

Under the RAD Notice, "involuntary permanent relocation" is prohibited and each resident must be able to exercise his or her right of return to the Covered Project. A PHA or Project Owner is permitted to offer a resident alternative housing options when a resident is considering his or her future housing plans, provided that at all times prior to the resident's decision, the PHA and Project Owner preserve the resident's ability to exercise his or her right of return to the Covered Project.

A) Requirements for Any Offer of Alternative Housing Options

All residents who are similarly situated must be given the same offer of alternative housing options. If the PHA or Project Owner seeks to limit the number of households that accept the

[91] The most recent consent must be within 180 days of the actual relocation date, as discussed in Section 6.10(D).
[92] In the case of voluntary permanent relocation, the date of "return" may be the same as the date of relocation away from the Converting Project.

offer of alternative housing options, the PHA or Project Owner shall determine a fair and reasonable method for selection among similarly situated residents.[93]

In connection with any offer and acceptance of alternative housing options, the PHA or Project Owner must ensure that the residents' decisions are: 1) fully informed; 2) voluntary; and 3) carefully documented. Any alternative housing option must include, at a minimum, all relocation assistance and payments required under this Notice, the URA and Section 104(d), as applicable, and may include other elements. Funds administered by HUD may not be used to pay any monetary elements not required under this Notice, the URA or Section 104(d).

Acceptance of an alternative housing option is considered voluntary permanent relocation and the accompanying RAD relocation assistance and payments for which the resident may be eligible must be administered in accordance with all requirements for an eligible displaced person under the URA and its implementing regulations and, where applicable, Section 104(d) and its implementing regulations.

PHAs may not propose or request that a displaced person waive rights or entitlements to relocation assistance under the URA or Section 104(d). The PHA must provide a written notice of URA or Section 104(d) relocation assistance and payments for which the resident may be eligible so that the resident may make an informed housing choice. The resident must be provided at least thirty (30) days to consider the offer of voluntary permanent relocation and the resident's acceptance of the PHA's offer of voluntary permanent relocation must be in writing signed by the head of the household for that unit.

B) Assisted Housing Options as Alternatives

Alternative housing option packages may include a variety of housing options and PHAs and Project Owners shall take particular care to ensure program compliance with the regulations applicable to the alternative housing options. Examples of alternative housing options may include:

- Transfers to public housing
- Admission to other affordable housing properties subject to the program rules applicable to such properties
- Housing Choice Vouchers (HCVs) subject to standard HCV program administration requirements. PHAs must operate their HCV programs, including any HCVs offered as an alternative housing option, in accordance with their approved policies as documented in their Section 8 Administrative Plan and HUD regulations at 24 C.F.R. part 982. Any offer of an HCV as an alternative housing option must be made consistent with the

[93] For example, if the RAD conversion is financed by LIHTC and a few residents would not meet LIHTC program requirements, the PHA and Project Owner may want to offer these household alternative voluntary permanent relocation options. However, they must offer the same alternative housing options to all such households. As a second example, if the PHA and Project Owner seek to create two on-site vacancies of a particular unit size in order to facilitate temporary relocation on-site, the PHA may offer an alternative housing option of a housing choice voucher to all residents of applicably sized units (assuming that to do so is consistent with the PHA's voucher administration policies), and conduct a lottery to select the two households which will receive the vouchers.

PHA's admission preferences and other applicable policies and procedures set forth in the Section 8 Administrative Plan.
- Homeownership programs subject to the applicable program rules
- Other options as may be identified by the PHA and/or Project Owner

C) Monetary Elements Associated With Alternative Housing Options

A PHA or a Project Owner may include a monetary element in an alternative housing option package, provided that:

- Any monetary element associated with the alternative housing option shall be completely distinct from and in addition to any required RAD, URA or Section 104(d) relocation payments and benefits for which the resident is eligible ("Required Relocation Payments").
- No funds administered by HUD may be used to pay for any monetary element associated with the alternative housing option other than Required Relocation Payments.
- Any monetary element associated with the alternative housing option other than Required Relocation Payments must be the same amount offered to all similarly situated households.[94]
- Any alternative housing option package must comply fully with the disclosure and agreement provisions of this Notice.

D) Disclosure and Agreement to Alternative Housing Options

In providing an offer of alternative housing options to a resident, the PHA or Project Owner must inform the resident in writing of: a) his or her right to return;[95] b) his or her right to comment on and/or object to plans which would preclude the resident from returning to the Covered Project; c) the requirement that if the resident objects to such plans, the PHA or Project Owner must alter the project plans to accommodate the resident in the Covered Project; and d) a description of both the housing option(s) and benefits associated with the right of return and the alternative housing options and benefits being offered. In the description of the available housing options and benefits, the PHA or Project Owner shall include a description of any temporary housing options associated exercising the right of return and a description of any permanent alternative housing options as well as a reasonable estimate of the financial implications of all temporary and permanent options on the resident long-term.

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[94] Monetary payments other than Required Relocation Payments are considered "temporary, nonrecurring or sporadic income" pursuant to 24 C.F.R. § 5.609(c)(9) and consequently are excluded from income for purposes of eligibility and assistance calculations under certain HUD programs. Residents should be reminded that monetary payments other than URA relocation payments may be taxable under the Internal Revenue Code, that monetary payments, including required relocation payments, may affect residents' eligibility for other assistance programs and that the resident should seek knowledgeable guidance on these matters, including guidance on the taxation of monetary payments under state law.

[95] In the case of a transfer of assistance to a new site a significant distance from the Converting Project as described in Section 6.4(E), the resident shall be informed of the resident's right to return to the Covered Project at the new site and of the resident's right to an assisted unit within a reasonable distance of the site of the Converting Project, as described in Section 6.4(E).

The written notification may request written consent from the resident to exercise the alternative housing option and receive permanent relocation assistance and payments pursuant to RAD, the URA and/or Section 104(d), as applicable, in addition to any benefits associated with the alternative housing option. As part of any voluntary consent, the resident head of household must acknowledge in writing that acceptance of such assistance terminates the resident's right to return to the Covered Project. In order to ensure that the resident has sufficient time to seek advice and consider the alternative housing options, any consent to an alternative housing option executed within 30 days of the written presentation of the options shall be invalid.

Any offer of alternative housing options must be made in writing and the acceptance of the alternative must be voluntary and in writing. The offer of an alternative housing option must contain the following elements:

- The resident is informed of his or her right to return to the Covered Project and that neither the PHA nor the Project Owner can compel the resident to relinquish his or her right to return. The offer of alternative housing options must clearly state that acceptance of any alternative would relinquish the resident's right to return to the Covered Project.
- The offer of an alternative housing option must be accompanied by identification of comparable housing units which the resident may use to understand the nature of housing options available to them and the rent and estimated utility costs associated with such housing options. This information must also be accompanied by a reasonable estimate of any replacement housing payment or "gap payment" for which the resident may be eligible.
- The offer of an alternative housing option must be accompanied by information regarding moving payments and assistance that would be available if the resident exercises the right of return and if the resident accepts the alternative housing option.
- Residents must be offered advisory assistance to consider their options.
- To be fully informed, the offer must outline the implications and benefits of each alternative housing option being made available (i.e., of accepting each alternative housing option as compared to exercising his or her right to return) as well as a reasonable estimate of when the resident's relocation might occur. Implications and benefits include payment amounts, differences in rent calculations, differences in program rules, housing location, and potential long-term implications such as household housing expenses multiple years in the future.
- To be fully voluntary, the resident must have at least thirty (30) days following delivery of the written offer to consider their options. LEP persons must be provided a written translation of the offer and oral interpretation of any meetings or counseling in the appropriate language. In addition, PHAs must comply with their obligation to ensure effective communication with persons with disabilities.
- The resident cannot be asked to make a decision which will be implemented at a distant future time. Consequently, the resident may not provide written consent to an alternative housing option (and consequently, consent to voluntary permanent relocation) until after

the earlier of issuance of the NOIA or the effective date of the RCC.[96] If a resident signs a written consent to accept an alternative housing option, that written consent is valid for 180 days. If relocation (after the applicable notice periods) has not occurred within this 180 day period, then the PHA or Project Owner must secure a new consent to accept an alternative housing option. New relocation notices are generally not required.

- The acceptance must be in writing signed by the resident head of household, including a certification of facts to document that the household is relinquishing its right to return and that the decision and the acceptance of the alternative housing option was fully informed and voluntary.
- Residents accepting alternative housing options to relinquish their right to return will be considered to have voluntarily and permanently relocated. Such residents are to be provided applicable RAD, URA and/or Section 104(d) relocation assistance and payments.

The information included with the offer of alternative housing options is to aid the resident in making decisions regarding the desirability of the alternative housing options and neither satisfies nor replaces the relocation notices and information required to be provided to residents pursuant to this Notice, the URA or Section 104(d).

While HUD does not require PHAs to submit documentation of alternative housing options offered to residents or the residents' elections, PHAs must keep auditable written records of such consultation and decisions. HUD may request this documentation at any time, including as part of a review of the Checklist or if relocation concerns arise.

6.11. Lump Sum Payments

PHAs and Project Owners should note that certain relocation payments to displaced residential tenants may be subject to 42 USC § 3537c ("Prohibition of Lump-Sum Payments") and must be disbursed in installments. The PHA or Project Owner may determine the frequency of the disbursements which must be made in installments. Handbook 1378, Chapter 3-7(D) provides guidance on the manner and frequency of disbursing payments subject to this requirement.

Any monetary element beyond Required Relocation Payments which may be associated with an alternative housing option described in Section 6.10, above, is not relocation assistance and is therefore not subject to the requirements regarding lump sum payments.

SECTION 7. APPLICABILITY OF HCV AND PUBLIC HOUSING REQUIREMENTS

7.1. HCV Waiting List Administration Unrelated to the RAD Transaction

From time to time, a resident of a Converting Project may place themselves on the PHA's waiting list for HCVs independent of any planned RAD transaction. With respect to residents of a Converting Project prior to the effective date of the HAP contract, PHAs should continue to

[96] The PHA and Project Owner should note that securing resident consent to an alternative housing option may delay the issuance of the RAD Notice of Relocation. The RAD Notice of Relocation must be specific to whether the resident will be temporarily or permanently relocated.

administer their HCV waiting list in accordance with their Section 8 Administrative Plans. Residents who rise to the top of the HCV waiting list independent of any preference for relocating RAD residents or other RAD provisions and accept an HCV are not considered to be relocated as a result of the RAD conversion. Standard administration of the PHA's HCV waiting list is not considered relocation.

7.2. HCV Waiting List Administration Related to the RAD Transaction

From time to time, a PHA may wish to use HCV resources as a relocation option in connection with a RAD transaction. In order to do so, a PHA must modify its Section 8 Administrative Plan to provide a preference for relocating RAD residents and the PHA is subject to Section 6.8 of this Notice relating to initiation of relocation. Further, if a PHA provides a preference for relocating RAD residents, the PHA must be explicit regarding the nature of the HCV as a relocation resource. If the PHA anticipates using the HCV as a temporary relocation resource, the PHA must recognize that it cannot rescind an HCV once issued to the resident (i.e., the family would have to voluntarily relinquish their voucher and may choose to remain in the HCV program indefinitely). The PHA must also provide a preference for admission to the Covered Project in order to satisfy the right to return. Alternatively, if the PHA anticipates using the HCV as a voluntary permanent relocation resources, the PHA must comply with the alternative housing options provisions of Section 6.10.[97]

7.3. Public Housing Transfers Unrelated to the RAD Transaction

From time to time, a resident of a Converting Project may request a transfer to another public housing property independent of any planned RAD transaction. With respect to residents of a Converting Project prior to the effective date of the HAP contract, PHAs must continue to administer their admissions and occupancy procedures as adopted. Any prohibitions in this Notice on implementing relocation do not apply to residents requesting public housing transfers, moves pursuant to the Violence Against Women Act (VAWA)[98] or reasonable accommodation moves. Standard administration of the PHA's admissions and occupancy policy is not considered relocation.[99] Transfers not undertaken for the RAD project are not subject to URA. However, it is recommended that the PHA document the transfer carefully, including an acknowledgement by the resident that the transfer is not undertaken for the RAD project, is not

[97] PHAs and Project Owners should note that while in most cases, there is no rent differential between the tenant paid rent in a public housing unit and in an HCV, there are some situations (such as flat rent households) where a difference does exist. Rental assistance payments under the URA are required if there is a difference between these two amounts.

[98] Title IV, section 40001-40703.

[99] Standard administration of the PHA's admissions and occupancy policy is permitted. However, HUD is sensitive to concerns that discussion of the planned RAD conversion and construction activities may cause residents to perceive a pressure to transfer without the counseling and moving assistance which would be available were the household to wait until relocation. If relocation at the Converting Project is planned, PHAs are strongly advised to document any such transfers carefully and to provide any households moving under standard admissions and occupancy policies with additional notices referencing the assistance and payments which would be available if the household were to remain in place until the relocation plan is implemented.

subject to URA requirements and that the resident is moving notwithstanding the guidance in the GIN or other relocation guidance from the PHA.

7.4. Resident Initiated Public Housing Transfers Related to the RAD Transaction

Pursuant to Section 1.8 of the RAD Notice, households in the Converting Project who do not want to transition to the Section 8 program may be offered, if available, the opportunity to move to other public housing owned by the PHA. Such move shall be implemented as a transfer and shall be prioritized equivalent to a "demolition, disposition, revitalization or rehabilitation transfer" as described in Section 11.2 of the applicable Public Housing Occupancy Guidebook. Transfers for this purpose do not require any modification to the PHA's admissions and occupancy policy and may occur at any time pursuant to the PHA's admissions and occupancy policy. Transfers for this purpose, while initiated by the resident, are the result of the PHA-initiated RAD transaction and the PHA must bear the reasonable costs of transfer. The reasonable cost of the transfer includes not just the cost of packing, moving, and unloading, but also the cost of disconnecting and reconnecting any existing resident-paid services such as telephone and cable television. The PHA must also document that the resident's transfer request is fully informed and fully voluntary, which documentation must include an acknowledgement by the resident that the transfer is not undertaken at the request of the PHA or under pressure from the PHA, that the resident is moving notwithstanding the guidance in the GIN or other relocation guidance from the PHA and that the resident is withdrawing from participation in the RAD program and consequently losing rights, including the right to return, which accrue to residents participating in the RAD program. A public housing resident who voluntarily seeks a public housing transfer is generally not considered to be displaced under the URA or Section 104(d), where applicable.

7.5. Public Housing as a Temporary Relocation Resource

PHAs and Project Owners may wish to mitigate the relocation budget associated with the RAD conversion by using units within the PHA's portfolio as relocation resources. In light of its mission to serve as many low-income households as possible, including its need to accommodate emergency transfers (such as moves pursuant to VAWA), the PHA should minimize the use of the public housing units not converting under RAD for temporary relocation of RAD impacted residents. HUD has a strong preference that the PHA use the units within the PHA's Converting Projects as a temporary relocation resource prior to using units in the remainder of the PHA's public housing portfolio. PHAs may elect not to lease units within the Converting Projects or, if necessary, the remainder of its portfolio, for this purpose only to the extent reasonably necessary to facilitate construction or rehabilitation.

Upon the effective date of the HAP contract (usually also the effective date of the RAD conversion), each resident of a Covered Project becomes a participant in the Section 8 program and is no longer part of the public housing program. A PHA may use public housing as a temporary relocation resource if approved by HUD, which approval shall depend on the proposed structure. PHAs wishing to use public housing units as a temporary relocation resource must consult with HUD's Office of Public and Indian Housing (PIH) prior to the formal request for HUD approval. It is unlikely that HUD would approve a request to use public housing units

as a relocation resource for a period exceeding one year after the effective date of the HAP contract.

If HUD grants approval, HUD shall provide alternative requirements regarding PIH Information Center (PIC) documentation of the occupancy of these temporary relocation resources. PHAs must follow any guidance or instructions regarding treatment of the public housing units in HUD's data systems as may be provided from time to time.

PHAs and Project Owners should note that, absent written approval, if a resident seeks to occupy a public housing unit after the effective date of the HAP contract, the resident would need to be readmitted to public housing in a manner consistent with the waitlist and admissions policies and must exit the Section 8 program.

7.6. Terminations (Including Evictions) and End of Participation Unrelated to the RAD Transaction

Public housing program requirements related to continued occupancy and termination, including rules on grievances and related hearings, remain in effect until the effective date of a new PBV or PBRA HAP contract. If a resident is evicted in accordance with applicable state and local law and the eviction is not undertaken for the purpose of evading the obligation to make available RAD relocation and URA payments and other assistance, the resident is generally not entitled to relocation assistance and payments under this Notice or the URA (49 C.F.R. § 24.206). If a resident voluntarily ends his or her participation in the public housing program, in the absence of evidence that the end of participation was induced by the PHA for the purpose of evading the obligation to make available RAD relocation and URA payments and other assistance, the resident is generally not entitled to relocation assistance and payments under this Notice or the URA.

7.7. Right-Sizing

Public housing, PBV and PBRA requirements mandate that, upon the availability of a unit which is appropriate for the household size, the PHA or Project Owner must transfer a household that is under- or over-housed into the unit appropriate to the household's size. However, accommodating all residents pursuant to the right of return has primacy over right-sizing requirements and may, in some cases, require temporarily over-housing households. In such circumstances, the PHA or Project Owner shall subsequently transfer the household to an appropriate size unit when available, as is required by the applicable program regulation. Such actions shall be governed by the applicable program regulation and shall not be considered relocation under this Notice.

Lourdes Castro-Ramirez
Principal Deputy Assistant Secretary for
Public and Indian Housing

Edward L. Golding
Principal Deputy Assistant Secretary for
Housing

APPENDIX I: Applicable Legal Authorities

APPENDIX II: Recommended Relocation Plan Contents

APPENDIX I: Applicable Legal Authorities

Part 1

This Appendix to the Notice identifies key legal authorities with respect to fair housing, civil rights, and resident relocation. This Appendix is not exhaustive of applicable legal authorities, which authorities may also include other Federal statutes, regulations and Executive Orders, and civil rights provisions related to other programs (including funding programs) associated with the RAD transaction.

Fair Housing Act (Title VIII of the Civil Rights Act of 1968, as amended)

The Fair Housing Act, 42 U.S.C. § 3601 et seq., and its implementing regulations, 24 C.F.R. part 100, prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, disability, or familial status. The Fair Housing Act applies to for-sale and rental housing, whether the housing is privately or publicly funded, including housing supported by tax credits. Single family homes, condominiums, apartment buildings, time-shares, dormitories, transitional housing, homeless shelters that are used as a residence, student housing, assisted living housing, and other types of housing are all covered by the Fair Housing Act.

Among its substantive provisions, the Fair Housing Act requires "covered multifamily dwellings," designed and constructed for first occupancy after March 13, 1991, to be readily accessible to and usable by persons with disabilities. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas are subject to the Act's design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas are subject to the Act's design and construction requirements.[100] In addition, the Fair Housing Act requires that housing providers make reasonable accommodations in rules, policies, and services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit, including public and common use areas, and that housing providers permit reasonable modifications of existing premises for persons with disabilities.

The Fair Housing Act also requires HUD to administer HUD programs and activities in a manner that affirmatively furthers fair housing (42 U.S.C. § 3608(e)(5). HUD's affirmatively furthering fair housing ("AFFH") rule in 24 C.F.R. §§ 5.150-5.180 will apply to PHAs (except for qualified PHAs) for the PHA's fiscal year that begins on or after January 1, 2018 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5. The affirmatively furthering fair housing regulations will apply to qualified PHAs, for the PHA's fiscal year that begins on or after January 1, 2019 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5.[101]

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[100] *See* 42 U.S.C. § 3604(f)(3)(c) and 24 C.F.R. § 100.205.

[101] For purposes of the AFFH rule, "[a]ffirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing under the AFFH rule means taking meaningful actions that, taken together, address

Additional detail and discussion of the interplay between the Fair Housing Act, Section 504, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

United States Housing Act of 1937 (1937 Act)

The United States Housing Act of 1937 (1937 Act) (42 U.S.C. § 1437c-1(d)(15)) requires PHAs to submit a 5-year plan and an Annual Plan. Pursuant to HUD regulations, the Annual Plan includes a certification by the PHA that the PHA will affirmatively further fair housing.

Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*) and HUD's implementing regulation (24 C.F.R. part 1) prohibit recipients of Federal financial assistance from discriminating, excluding from participation, or denying benefits to, any person on the basis of race, color, or national origin. In addition, Title VI regulations prohibit HUD recipients of Federal financial assistance from utilizing criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin (24 C.F.R. § 1.4(b)(2)(i)). When determining the site or location of housing, recipients may not make selections with the purpose or effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination on the ground of race, color, or national origin (24 C.F.R. § 1.4(b)(3)). An applicant or recipient of HUD financial assistance also has an obligation to take reasonable action to remove or overcome the consequences of prior discriminatory practices regardless of whether the recipient engaged in discriminatory conduct (24 C.F.R. § 1.4(b)(6)).

Recipients of Federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities for persons who have limited ability to read, speak, or understand English – i.e., individuals who have limited English proficiency (LEP). This includes oral and written communications during relocation and throughout a RAD transaction. Such language assistance may include, but is not limited to, providing written translation of notices regarding the plans for the project and relocation and oral interpretation at meetings. Otherwise, LEP persons may be denied participation in, and the benefit of, the recipients' program or activity. On January 22, 2007, HUD issued "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons**"** (LEP Guidance), available at: http://www.lep.gov/guidance/HUD_guidance_Jan07.pdf.[102]

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significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws." 24 C.F.R. § 5.150. Meaningful actions means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity. See 24 C.F.R. § 5.152.

[102] *See also* Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, which requires recipients of Federal financial assistance to take reasonable steps to provide meaningful access to

Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 provides: "No otherwise qualified individual with a disability in the United States … shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, service or activity receiving Federal financial assistance."[103]

Among other things, HUD's regulations implementing Section 504 (in 24 C.F.R. part 8) prohibit recipients of Federal financial assistance, in determining the site or location of a facility receiving such assistance, from making site selections the purpose or effect of which would (1) exclude qualified individuals with disabilities from or deny them the benefits of a program or activity, or otherwise subject them to discrimination; or (2) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities.[104] These prohibitions apply to both determining the site of permanent facilities and a site for relocation of residents.

Furthermore, HUD's implementing regulations prohibit discrimination, the denial of benefits, or the exclusion of participation of individuals with disabilities from the programs or activities of recipients of federal financial assistance because a recipient's facilities are inaccessible. Such recipients must provide qualified individuals with disabilities with program access, which may require modification of architectural features of facilities in RAD transactions for individuals with disabilities to have access to the program. Certain architectural specifications apply to facilities that are altered or newly constructed with HUD financial assistance, such as facilities where assistance is transferred and facilities used as temporary or permanent relocation sites for residents of a project undergoing a RAD conversion. If alterations are made to a housing facility, the alterations to dwelling units in the facility are required, to the maximum extent feasible (i.e., if doing so would not impose undue financial and administrative burdens on the operation of the project), to be made readily accessible to and usable by individuals with disabilities. If alterations taken to a development that has 15 or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility (except when it requires removal of structural load-bearing members), or if the facility is newly constructed, then a minimum of 5% of the total dwelling units, or at least one unit in a development, whichever is greater, must be made accessible for persons with mobility impairments. An additional 2% of the units, but not less than one unit, in a development must be accessible for persons with hearing and vision impairments.

In addition, regulations implementing Section 504 require recipients to make reasonable accommodations for persons with disabilities. A reasonable accommodation is a change, adaptation, or modification to a policy, program, service, or workplace which will allow a qualified person with a disability to participate fully in a program, take advantage of a service, or perform a job. Section 504 also includes effective communication requirements, such as

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their programs and activities for LEP persons. E.O. 13166 directs all Federal agencies, including HUD, to issue guidance to help recipients of Federal financial assistance in providing such meaningful access to their programs.

[103] 29 U.S.C. § 794. HUD's Section 504 regulation that applies to recipients of Federal financial assistance, including PHAs and Project Owners, is located at 24 C.F.R. part 8.

[104] 24 C.F.R. § 8.4(b)(5).

providing interpreters and alternate format documents (e.g., Braille, large print, accessible electronic communications) for persons with disabilities.

Additional detail and discussion of the interplay between Section 504, the Fair Housing Act, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

Titles II and III of the Americans with Disabilities Act

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in all services, programs, and activities provided or made available by public entities. Title II of the ADA applies to housing developed or operated by state and local governments, which includes a PHA. Title III of the ADA prohibits discrimination on the basis of disability by public accommodations and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. For example, Title III applies to rental offices, sales offices, homeless shelters, hotels and motels, and commercial spaces associated with housing, such as daycare centers, social service offices, and sales and retail establishments. Titles II or III also will generally apply to community spaces and facilities, such as neighborhood networks, to computer centers (including the computers in the centers), and to transportation services and conveyances provided by PHAs and Project Owners.

Additional detail and discussion of the interplay between Titles II and III of the Americans with Disabilities Act, the Fair Housing Act, and Section 504 of the Rehabilitation Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

Section 109

Section 109 of the Housing and Community Development Act of 1974 (HCDA of 1974), Title I, prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex in Community Development Block Grant (CDBG) programs and activities. Section 109 applies to RAD projects that receive CDBG or other assistance under Title I of the HCDA of 1974.

In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 to ensure that individuals are not subjected to discrimination on the basis of race, color, national origin, disability, age, religion, or sex by recipients of CDBG funds. Section 109 charges HUD with enforcing the right of individuals to live in CDBG-funded housing and participate covered programs and activities free from such discrimination. However, this additional statutory authority only applies to programs authorized under Title I of the HCDA of 1974, such as CDBG and programs, such as Section 108 loan guarantees and the Historically Black Colleges and Universities program.

Equal Access to HUD-assisted or HUD-insured Housing

HUD requires its housing programs to be open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status. HUD recipients and subrecipients must comply with 24 C.F.R. § 5.105(a)(2) when determining eligibility for housing assisted with HUD

funds or subject to an FHA-insured mortgage, and when making such housing available. This includes making eligibility determinations and making housing available regardless of actual or perceived sexual orientation, gender identity, or marital status, and prohibiting inquiries about sexual orientation or gender identity for the purpose of making eligibility determinations or making housing available. Applicants are encouraged to become familiar with these requirements, HUD's definitions of sexual orientation and gender identity at 24 C.F.R. § 5.100, clarifications to HUD's definition of family at 24 C.F.R. § 5.403, and other regulatory changes made through HUD's Equal Access Rule, published in the Federal Register at 77 FR 5662 (Feb. 3, 2012).

Section 3: Economic Opportunities for Low- and Very Low-income Persons.

Certain HUD programs require recipients of assistance to comply with Section 3 of the Housing and Urban Development Act of 1968 (Section 3), 12 U.S.C. § 1701u (Economic Opportunities for Low- and Very Low-Income Persons in Connection with Assisted Projects), and the HUD regulations at 24 C.F.R. part 135. The regulations at 24 C.F.R. part 135 implementing Section 3 ensure, to the greatest extent feasible, that training, employment, contracting and other economic opportunities be directed to low- and very low-income persons, especially recipients of government assistance for housing, and to businesses that provide economic opportunities to low-and very low-income persons where proposed project is located. Recipients of funds covered by Section 3 must comply with 24 C.F.R. part 135, particularly subpart B-Economic Opportunities for Section 3 residents and Section 3 Business Concerns, and Subpart E-Reporting and Recordkeeping. HUD encourages recipients to search the national Section 3 Business Registry to find local businesses that prioritize hiring Section 3 residents.

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 USC § 4601 *et seq.* (URA) is a Federal law that establishes minimum standards for programs or projects receiving Federal financial assistance that include the acquisition of real property (real estate) and/or displace persons from their homes, businesses, or farms as a result of acquisition, rehabilitation, or demolition.[105] The URA implementing Federal regulations can be found at 49 C.F.R. part 24. Project-Based Voucher (PBV) and Project-Based Rental Assistance (PBRA) are considered Federal financial assistance for purposes of the URA. As a result, the URA will apply to acquisitions of real property and relocation of persons from real property that occur as a direct result of acquisition, rehabilitation or demolition for a project that involves conversion of assistance to PBV or PBRA programs under RAD.

[105] For additional guidance, see HUD Handbook 1378 Tenant Assistance, Relocation, and Real Property Acquisition), available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/library/relocation/policyandguidance/handbook1378.

Section 104(d) of the Housing and Community Development Act of 1974

Section 104(d) of the Housing and Community Development Act of 1974, as amended, 42 USC § 5304(d), (Section 104(d)), is a Federal law that applies when a lower-income dwelling is demolished or converted (as conversion is defined in accordance with 24 C.F.R. § 42.305) to a use other than lower-income housing in connection with a Community Development Block Grant Program (CDBG) or HOME Investment Partnerships Program (HOME) funded activity. Under Section 104(d), a lower-income person is considered displaced and, therefore eligible for Section 104(d) relocation assistance if the person permanently moves from real property or permanently moves personal property from real property as a direct result of the demolition or conversion of a lower-income dwelling to a use other than lower-income dwelling unit in connection with a CDBG or HOME funded activity. The Section 104(d) one-for-one replacement housing requirements may apply with respect to occupied and vacant occupiable lower-income dwelling units that are demolished or converted to a use other than lower-income dwelling units in connection with CDBG or HOME funded activity. Section 104(d) implementing regulations can be found at 24 C.F.R. part 42, Subpart C. Additional HUD policy and guidance for Section 104(d) is available in HUD Handbook 1378, Chapter 7.

Part 2 – Accessibility Requirements

Federal accessibility requirements apply to all RAD projects – whether they include new construction, alterations, or existing facilities. Applicable laws include, but are not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, and Titles II or III of the Americans with Disabilities Act (ADA). A PHA or Project Owner must comply with each law that applies to its project and with the requirement that provides the most accessibility when two or more laws apply. All three laws include new construction requirements. Substantial alterations, additions, rehabilitation and existing facilities must be in compliance with applicable requirements of Section 504 and the ADA.[106] All three laws may also require reasonable accommodations or modifications.

Accessibility Requirements for New Construction

The Fair Housing Act requires all "covered multifamily dwellings" designed and constructed for first occupancy after March 13, 1991, to be readily accessible to and usable by persons with disabilities. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas must meet the Fair Housing Act's design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas must meet the Fair Housing Act's design and construction requirements. The Fair Housing Act requires that all covered multifamily dwellings be designed and constructed so that public and common use areas are readily accessible to and usable by persons with disabilities; all doors are sufficiently wide to allow passage by persons using wheelchairs; all units contain accessible routes into and through the dwelling unit; light switches, electrical outlets, thermostats, and other environmental controls are in accessible locations; reinforcements are installed in bathroom walls to allow later installation

[106] *See* 24 C.F.R. § 100.205 (Fair Housing Act) and 24 C.F.R. §§ 8.22 and 8.23 (Section 504). *See also* 28 C.F.R. § 35.151(b) and 28 C.F.R. part 36 (ADA Titles II and III regulations, respectively).

of grab bars; and kitchens and bathrooms are usable such that a person in a wheelchair can maneuver about the space.[107] These design and construction requirements apply whether the housing is privately or publicly funded, including housing supported by tax credits.[108]

New construction of a multifamily housing project containing five or more dwelling units is also subject to physical accessibility requirements under Section 504. Under Section 504, a "project" includes all residential and appurtenant structures, equipment, roads, walks, and parking lots which are covered by a single contract or application for Federal financial assistance, or are treated as a whole for processing purposes, whether or not they are located on a single site.[109] The accessibility standards for new construction under Section 504 are the Uniform Federal Accessibility Standards (UFAS).[110] HUD recipients may also use the 2010 ADA Standards for Accessible Design under title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice"). This option exists until HUD formally revises its Section 504 regulation to adopt an updated accessibility standard. Refer to HUD's Deeming Notice for more information.

Section 504 also requires that a minimum of 5% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with mobility impairments. An additional 2% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with vision and hearing impairments.[111] HUD may prescribe a higher percentage or number of units upon request by any affected recipient or by any State or local government or agency based upon demonstration to the reasonable satisfaction of HUD of a need for a higher percentage or number, based on census data or other available current data, or in response to evidence of a need for a higher percentage or number received in any other manner. In reviewing such request or otherwise assessing the existence of such needs, HUD shall take into account the expected needs of eligible persons with and without disabilities.[112]

Title II of the ADA prohibits discrimination on the basis of disability in all services, programs, and activities provided or made available by public entities. Title II of the ADA applies to housing programs, including housing developed or operated by state and local governments, which includes PHAs. Title III of the ADA prohibits discrimination on the basis of disability by public accommodations, including rental offices, and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. All newly constructed or altered facilities, including facilities altered to

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[107] *See* 24 C.F.R. § 100.205.
[108] For more information about the design and construction provisions of the Fair Housing Act, see www.fairhousingfirst.org. See also the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Accessibility (Design and Construction) Requirements for Covered Multifamily Dwellings Under the Fair Housing Act (April 30, 2013), available at: www.hud.gov/offices/fheo/library/hudjointstatement.pdf.
[109] *See* 24 C.F.R. § 8.3.
[110] The UFAS are available at https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/ufas). *See also* 24 C.F.R. § 8.32.
[111] *See* 24 C.F.R. § 8.22.
[112] *See* HUD regulation at 24 C.F.R. § 8.22(c).

comply with program access and readily achievable barrier removal obligations that exist under Titles II or III of the ADA, must comply with the U.S. Department of Justice's ADA architectural accessibility standards as described in the following U.S. Department of Justice Technical Assistance document ADA Requirements, Effective Date/Compliance Date (Feb. 2011), http://www.ada.gov/revised_effective_dates-2010.htm.

Accessibility Requirements for Alterations

If a building was constructed for first occupancy after March 13, 1991, the building must be in compliance with, and all alterations must maintain the building's accessible features so that the building continues to meet, the Fair Housing Act's accessibility requirements. In addition, without regard to the date of construction for first occupancy, certain alterations may be required under the Fair Housing Act if requested by a resident as a reasonable accommodation or modification or otherwise required to remediate accessibility deficiencies in the design and construction of the building.

Under HUD's Section 504 regulation, alterations include any structural change in a facility or a change to its permanent fixtures or equipment. If alterations are undertaken to a project that has fifteen or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility, this qualifies as "substantial alterations," in which the new construction provisions of 24 C.F.R. § 8.22 apply.[113]

When alterations are made that do not qualify as substantial alterations, alterations to dwelling units in a multifamily housing project shall, to the maximum extent feasible, be made to be readily accessible to and usable by individuals with disabilities.[114] If alterations of single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, the entire dwelling unit shall be made accessible. Once 5% of the dwelling units in a housing project are readily accessible to and usable by individuals with mobility impairments, no additional elements of dwelling units or entire dwelling units are required to be accessible under this provision. However, alterations to meet ongoing accessibility needs are always required, for example, in response to a reasonable accommodation request. Alterations to common areas or parts of facilities that affect accessibility of existing housing facilities shall, to the maximum extent feasible, be made to be accessible to and usable by individuals with disabilities. For purposes of this paragraph, the phrase "to the maximum extent feasible" shall not be interpreted as requiring that a recipient (including a PHA) make a dwelling unit, common area, facility or element thereof accessible if doing so would impose undue financial and administrative burdens on the operation of the multifamily housing project.[115]

All altered facilities covered by Titles II or III of the ADA must be altered in accordance with the U.S. Department of Justice's 2010 ADA Standards for Accessible Design and applicable ADA

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[113] *See* 24 C.F.R. § 8.23(a). The sole exception is that load bearing structural members are not required to be removed or altered.
[114] HUD may require a higher number or percentage of accessible units pursuant to 24 C.F.R. § 8.22(c) and 24 C.F.R. § 8.23(b)(2).
[115] 24 C.F.R. § 8.23(b).

regulations, unless subject to certain safe harbors identified in the 2010 ADA revised regulations for Titles II and III, as applicable.[116]

HUD will consider on a case-by-case basis a PHA's request to undertake limited new construction on the site of a Covered Project undergoing rehabilitation to comply with accessibility requirements on the site.

Additional Accessibility Requirements for Both New Construction and Alterations

Accessible units must be distributed throughout projects and sites and be available in a sufficient range of sizes and amenities so that a qualified individual with disabilities' choice of living arrangements is, as a whole, comparable to that of other persons eligible under the same program.[117] This provision shall not be construed to require provision of an elevator in any multifamily housing project solely for the purpose of permitting location of accessible units above or below the accessible grade.

PHAs are encouraged to use universal design principles, visitability principles and active design guidelines in planning new construction or retrofit work, wherever feasible. However, adherence to universal design principles does not replace compliance with the accessibility requirements of Section 504, the ADA and the Fair Housing Act.

Program Accessibility Requirements

Under Section 504, recipients must operate each existing housing program or activity receiving Federal financial assistance so that the program or activity, when viewed in its entirety, is accessible to and usable by individuals with disabilities. Title II of the ADA also includes a program access requirement, while Title III of the ADA requires readily achievable barrier removal.[118] Further, Section 504, the Fair Housing Act, and the ADA require that reasonable accommodations/modifications be granted to address disability-related needs of individuals with disabilities.[119]

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[116] *See* http://www.ada.gov/regs2010/2010ADAStandards/2010ADAstandards.htm.
[117] *See* 24 C.F.R. §§ 8.26 and 8.27.
[118] *See* 28 C.F.R. § 35.150; 28 C.F.R. § 36.304.
[119] For more information on reasonable accommodations, see the HUD/DOJ Joint Statement on Reasonable Accommodations Under the Fair Housing Act at http://portal.hud.gov/hudportal/documents/huddoc?id=JOINTSTATEMENT.PDF. While this joint statement focuses on the Fair Housing Act, the principles discussed in the statement generally apply to requests for reasonable accommodation under Section 504, except, for purposes of Section 504, HUD recipients are required to provide and pay for structural modifications as a reasonable accommodation.

APPENDIX II: Recommended Relocation Plan Contents

While RAD mandates written relocation plans only for projects which involve permanent relocation (including, without limitation, a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than one year, HUD strongly encourages PHAs to document their relocation planning process and procedures in a written relocation plan. The following provides suggested content for required and recommended relocation plans. In the case of any discrepancy between this description of the recommended relocation plan contents and the provisions of the Notice to which this Appendix is attached or any applicable laws or regulations with respect to the URA or Section 104(d), the provisions of the Notice or applicable laws and regulations shall govern.

The basic elements of the relocation plan include:

- A general description of the project and project elements that may create relocation needs;
- Information on residents of the project and eligibility for relocation assistance and payments;
- Information regarding how the project will address the RAD right to return requirements and the project's re-occupancy policies;
- A detailed discussion of plans for temporary relocation assistance;
- A detailed discussion of any transfer of assistance;
- A detailed discussion of any offers of alternative housing options and plans for voluntary permanent relocation assistance;
- A detailed discussion of compliance with fair housing and civil rights requirements, including accessibility requirements;
- The relocation budget; and
- The appeals process.

The plan as a whole should discuss the specific steps to be taken to minimize the adverse impacts of relocation on the residents.

I. Project Summary

The Relocation Plan should provide a general description of the property (e.g., year built, location, number of units, configuration, resident population served). The project summary should also identify the nature of the activities to be undertaken, including acquisition, demolition, rehabilitation, and construction activities and additional detail regarding the project scope (e.g., gut rehab, systems replacement, modest in-unit renovations, transfer of assistance). The project summary should also discuss how any construction activities are to be implemented (i.e., vacate the property entirely, vacate specific floors or buildings, rehabilitation with residents in place). The summary should also discuss the overall theory of relocation, for example, whether a few households will be relocated off-site and the vacant units will be used as temporary housing before other households move back to their original units (a "hoteling" approach), or whether the vacant units will be permanently occupied, with the residents vacating other units to be renovated (a "domino" approach).

The relocation plan should also identify the funding sources which may trigger relocation requirements, with particular attention to the potential presence of HOME or CDBG funds which may trigger Section 104(d) requirements.

II. Project Occupancy

The Relocation Plan should provide information on occupancy of the property including the number of residents, their household type (family, elderly), any non-residential (commercial) occupants, and should identify how any routine needs (such as continuation of utilities such as telephone service) and civil rights compliance issues (for example, limited English proficiency, disabilities, reasonable accommodations and unit modifications that have been or may be necessary) shall be identified and addressed. The Relocation Plan may specify the community meetings, interviews and/or other processes that will be undertaken to assess the residents' needs.

The Relocation Plan should also address eligibility for relocation assistance and payments, applying the rules of the Notice to the particularities of the project.

III. Resident Return and Re-occupancy Policies

The Plan should address how the project will honor the RAD right to return requirements and the "no re-screening upon conversion" policy. With respect to residents who will be temporarily relocated, the Plan should include the methodology that will be used to determine the sequence in which residents will re-occupy units at the project after rehabilitation, demolition, and/or construction is completed, and to determine how residents are matched with units if the residents are not able to return to their original unit. For example, if units will come online in stages, the plan should outline how the PHA or Project Owner will determine when each resident will return to the property.

IV. Temporary Relocation Assistance

The plan should detail the temporary housing resources to be used, the anticipated duration of temporary relocations, notices to be provided and the temporary relocation assistance the PHA or Project Owner will provide for residents (Paragraph 2-7 of HUD Handbook 1378). Topics to be addressed in the Plan include:

- Temporary Housing Resources. The Plan should identify the nature and availability of the temporary housing resources the PHA or Project Owner anticipates using. On-site resources are generally preferred. However, in some cases, PHAs or Project Owners may need to use hotel rooms for short-term relocations, or market-rate apartments. If the PHA or Project Owner anticipates using other assisted housing resources (such as HCVs, public housing or other properties with regulatory restrictions), the PHA or Project Owner should take particular care to address regulatory issues.
- Allocation of Temporary Relocation Resources. The Plan should describe a fair and reasonable methodology for allocating temporary relocation housing to residents on a nondiscriminatory basis.
- Duration of Temporary Relocation. In the event that the Plan includes relocation which is anticipated to exceed one year, it should detail the requirements which apply to those

residents (such as the issuance of a *Notice of Relocation* to the resident covering eligibility for URA relocation assistance, the offer of permanent relocation assistance and payments at URA levels and, if conditions warrant, the subsequent issuance of a *Notice of Eligibility*) as distinct from requirements that apply to residents who are not relocated for more than one year.

- Packing and Moving Assistance. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
    - Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
    - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
    - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
    - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses. The PHA or Project Owner can choose to do one or more of the following:
        - Undertake the moves itself, using employees of the PHA or Project Owner or "force account labor"[120]
        - Use a contractor or moving company
        - Reimburse residents for all actual, reasonable and necessary moving expenses.
- Storage. The Plan should address whether storage of the resident's personal property is necessary and the arrangements for such storage.
- Damage or Loss. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or the replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
- Out-of-Pocket Expenses. The nature of out of pocket expenses vary based on the nature of the temporary relocation moves. For example, hotel stays or in-place renovation may trigger the need for reimbursement of meals while a kitchen is unavailable. The Plan should outline the anticipated out-of-pocket expenses and the PHA's or Project Owner's plans and budget with respect to these expenses.
- Leasing Arrangements. The Plan should address whether the resident will have a direct lease or other contractual relationship with the owner of the temporary relocation resource or whether the PHA or Project Owner will hold the lease and the resident will maintain a contractual relationship with the PHA or Project Owner.
- Utility Costs. The Plan should address whether residents will need to disconnect and reconnect necessary utilities and, if so, how the PHA or Project Owner anticipates managing this process and any associated expenses. Necessary utilities may include telephone, cable service, Internet access or other items. The Plan should address payment of utility deposits, if required at the temporary relocation housing (HUD Handbook 1378, paragraph 2-7(A)(3)).

[120] Defined at 24 C.F.R. 905.108.

- Reasonable Accommodations. The plan should address whether residents with disabilities will require reasonable accommodations during temporary relocation and, if so, how the PHA or Project Owner anticipates ensuring the provision of reasonable accommodations and any associated expenses. Reasonable accommodations may include, among other items, the provision of transportation assistance, relocation to locations which are physically accessible and located near public transportation, and modifications to policies to allow individuals with disabilities to reside with a live-in aide.

V. Transfer of Assistance

Relocation planning in the context of transfer of assistance is particularly complex. The PHA should address how RAD, URA and Section 104(d) requirements each apply, as the same activity may be treated differently under each regulatory framework. The Plan should specifically outline the PHA's procedures to ensure that the applicable requirements are applied to each situation appropriately. The Plan should also address whether relocation is required for any businesses or residents at the destination site. Finally, the Plan should address whether two moves – from the public housing site to an intermediate site and then to the transfer of assistance site – are necessary while the Covered Project is being constructed or rehabilitated.

VI. Alternative Housing Options and Voluntary Permanent Relocation Assistance

If the PHA or Project Owner seeks to offer alternative housing options, the Plan should identify those options and the manner in which they are presented to residents for decision. The plan should also outline the counseling the PHA or Project Owner will provide to assist the residents in determining what options may be available and the financial implications of those options, for example,

1. Discussion of whether units available in the market (either in the affordable market or the unrestricted market) will meet the financial and dwelling requirements of relocated residents;
2. The general area or location of unit(s);
3. Where applicable, the accessibility of such units for individuals with disabilities;
4. Criteria for receiving relocation assistance; and
5. Any other information that might benefit residents in their consideration of housing choices.

The Plan should identify how the PHA or Project Owner will work with any residents who have elected voluntary permanent relocation. The Plan should further include a description of the permanent relocation assistance the PHA or Project Owner will provide to such residents. Topics to be addressed in the Plan include:

- Replacement Housing. The Plan should address the availability of comparable replacement housing, the notices to be provided and the provisions to ensure that appropriate accessibility features are available in compliance with applicable laws and regulations.

- Fair housing considerations. The Plan should address referrals to housing not located in areas of minority concentration and compliance with requirements regarding accessible housing for persons with disabilities. The Plan should address how the PHA or Project Owner will determine if residents have paid for the acquisition and/or installation of accessible features in the housing from which they are being relocated and how the PHA or Project Owner will ensure that the replacement housing contains required and comparable accessible features or that the resident is appropriately compensated for the cost of acquiring and/or installing required and comparable accessible features.
- Packing and Moving Assistance. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
    - Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
    - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
    - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
    - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses consistent with 49 C.F.R. § 24.301 or, at the resident's option, 49 C.F.R. § 24.302.
- Storage. The Plan should address whether storage of the resident's personal property is necessary and the arrangements for such storage. See 49 C.F.R. § 24.301(g)(4).
- Damage or Loss. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or the replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
- Dislocation Allowance. The Plan should address when the resident is entitled to a dislocation allowance and the amount of such dislocation allowance, consistent with the URA Fixed Residential Moving Cost Schedule available at: www.fhwa.dot.gov/real_estate/uniform_act/relocation/moving_cost_schedule.cfm.
- Appliances. The Plan should address disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property.
- Security Deposits and Utility Costs. The Plan should address how the PHA or Project Owner anticipates managing transfer of utility arrangements, security deposits and any associated expenses. Utilities may include telephone, cable service, Internet access or other items that may have been in place in the resident's original home. See 49 C.F.R. § 24.301(h)(12).
- Replacement Housing Payment. The Plan should address the circumstances in which displaced residents may be entitled to a replacement housing payment (RHP) to cover the

increase, if any, in monthly housing costs for a 42-month period pursuant to URA requirements or a 60-month period pursuant to Section 104(d).[121]

VII. Relocation Budget

Based on the results of the planning process, the PHA or Project Owner should create a relocation budget that includes the following six components:

1) The cost of administering the plan and providing assistance and counseling.

2) Reasonable moving expenses for a person with disabilities, which may include the cost of moving assistive equipment that is the personal property of the residents, the furnishings and personal belonging of a live-in aide, and/or other reasonable accommodations (HUD Handbook 1378, Paragraph 3-2).

3) The cost of the physical move of the residents' belongings. (It is suggested that the move costs be broken down by average cost per move type multiplied by the number of moves.) This physical move cost total should be based on the move scenarios anticipated or projected by the resident survey. The move costs should consider:

   For temporary relocation moves:
   - Number and cost of two-way moves (i.e., a move to another unit and then a return move) within the same building/complex.
   - Number and cost of two-way moves to a unit not in the same building/complex

   For permanent moves:
   - Number and cost of one-time moves into another unit in the same building/complex.
   - Number and cost of one permanent move to a unit not within the same building/complex
   - Any required dislocation allowance

4) The estimated cost of projected increases in monthly housing costs and other expenses for temporary relocation (if applicable).

5) The estimated cost of projected replacement housing payments (RHP) (42-month period for URA or 60-month period if Section 104(d) applies).

6) Contingency costs estimated for carrying out the relocation process necessary to complete the proposed project.

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[121] *See also,* CPD Notice 2014-09 "Effective Date of Moving Ahead for Progress in the 21st Century Act (MAP-21) Changes to Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) Payment Limits and Replacement Housing Payment Eligibility Criteria."

VIII. Written and Oral Communications with Individuals with Disabilities and LEP Persons and Use of Accessible Meeting Locations

The Plan should identify how the PHA or Project Owner will take appropriate steps to ensure effective communication with residents and other individuals with disabilities involved in the relocation, such as through the provision of sign language and other interpreters and large print, Braille, accessible electronic, and other alternate format written communications. The Plan should identify the measures to be taken to ensure the most integrated meeting settings appropriate to individuals with disabilities. The Plan should identify how the PHA or Project Owner will ensure meaningful access for LEP persons, such as through written materials and oral communications provided in languages other than English.

IX. Appeal Process

The Plan should specify the procedures to be followed if a resident disagrees with the PHA's or Project Owner's decision as to the resident's eligibility to receive relocation assistance, the amount of a relocation payment, or the adequacy of a comparable replacement dwelling offered to a resident. These procedures should include the process for filing a written appeal to the displacing agency and the specific appeal procedures to be followed consistent with 49 C.F.R. 24.10 (and 24 C.F.R. § 42.390 if Section 104(d) is involved).

X. Certification

The Plan should contain a certification of compliance with this Notice (or H 2014-09/PIH 2014-17, if applicable), the URA, fair housing and civil rights requirements and, if applicable, Section 104(d).

Technical Assistance

For detailed technical assistance regarding the contents or provisions of a written relocation plan, the PHA or Project Owner should direct questions to their RAD Transaction Manager or email rad@hud.gov.