



**homeforward**

hope. access. potential.

YEAR 19

# Moving to Work

ANNUAL PLAN

Original Submission:

December 21, 2016

HUD Approval Received:

February 23, 2017

Fiscal Year End Change Amendment Submitted:

Note: Home Forward obtained HUD approval to shift our fiscal year to align with the calendar year. This FY2018 Plan covers an adjusted fiscal year from April 1, 2017 to December 31, 2018.



## **Home Forward Board of Commissioners**

James Smith, Chair  
Miki Herman, Vice Chair  
Damien Hall, Treasurer  
David Widmark, Chair Emeritus  
Jennifer Anderson, Commissioner  
Richard Anderson, Commissioner  
Matthew Gebhardt, Commissioner  
Jenny Kim, Commissioner  
Wendy Serrano, Commissioner

## **Home Forward Executive Staff**

Michael Buonocore, Executive Director  
Peter Beyer, Chief Financial Officer  
Ian Davie, Chief Operating Officer  
Kitty Miller, Chief Administrative Officer  
Carolina Abdalah, Director, Integrated Facilities Services and Safety  
Elise Anderson, Director, Property Management  
Tim Collier, Director, Communications  
Michael DePaepe, Director, Information Technology  
Betty Dominguez, Director, East County Relations  
Dena Ford-Avery, Director, Housing Choice Vouchers  
Melissa Richardson, Director, Business Services  
Molly Rogers, Director, Asset Management and Housing Policy  
Ian Slingerland, Director, Homeless Initiatives  
Jonathan Trutt, Director, Development and Community Revitalization



**home**forward

hope. access. potential.

YEAR 19

# FY2018 Moving to Work ANNUAL PLAN

April 1, 2017 – December 31, 2018

# Table of Contents

<b>Introduction</b>	<b>1</b>
Introduction.....	1
Long-term Goals and Objectives.....	2
FY2018 Goals and Objectives.....	3
MTW Activities Table.....	6
Non-MTW Activities.....	7
<b>General Housing Authority Operating Information</b>	<b>15</b>
Housing Stock Information.....	15
Leasing Information.....	28
Wait List Information.....	30
<b>Proposed MTW Activities</b>	<b>34</b>
Utilization of local competitive process for project-basing leased housing assistance.	
<b>Approved MTW Activities</b>	<b>35</b>
<b>Implemented Activities</b>	
01 Rent Reform.....	35
02 GOALS – Home Forward’s family economic opportunity program (modification to previously approved activity).....	41
03 Local Blended Subsidy.....	47
06 Alternate inspection requirements for partner-based programs.....	49
07 Landlord self-certification of minor repairs.....	51
08 Inspection and rent reasonableness at Home Forward-owned properties.....	53
09 Measures to improve the rate of voucher holders who successfully lease-up.....	55

10 Local Project-Based Voucher program .....	58
11 Align utility allowance adjustment process.....	64
13 Broaden range of approved payment standards .....	65
14 Program Based Assistance .....	69
15 Tenant-based voucher set aside policies.....	72

**Not Yet Implemented**

<b>Activities</b> .....	
.....	75

**Closed Out**

<b>Activities</b> .....	
.....	76

12 Alternative Initial Housing Assistance Payment Policy.....	76
---	----

Closed Out Activities

Chart.....	
.78	

**Sources and Uses of Funds** **79**

---

Sources and Uses of MTW Funds.....	79
Local Asset Management Plan.....	87

**Administrative** **88**

---

Board Resolution and Certification of Compliance.....	88
Public Review Process .....	94
Annual Statement/Performance and Evaluation Report .....	97

**Appendix** **123**

---

Local Asset Management Plan.....	123
----------------------------------	-----

---

Rental Assistance Demonstration..... 131

Appendix A and B: Resident Rights, Participation, Waiting List, and Grievance Procedures..... 157

### Introduction

Moving to Work (MTW) is a U.S. Department of Housing and Urban Development (HUD) demonstration program that offers public housing authorities (PHAs), like Home Forward, the opportunity to develop and pilot innovative, locally-designed housing and economic independence strategies for families by allowing exemptions from existing public housing and Housing Choice Voucher regulations. The program also permits PHAs to combine operating, capital, and tenant-based assistance funds into a single agency-wide funding source. The purposes of the MTW program are to give PHAs and HUD the flexibility to design and test various approaches for providing and administering housing assistance that accomplish three primary goals:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

Home Forward has been designated an MTW agency since 1998. The recently approved 2016 Consolidated Appropriations Act extended the MTW demonstration through fiscal year 2028 for Home Forward. This allows Home Forward to continue to utilize MTW flexibility to support our mission of assuring that the people of the community are sheltered.

The following Fiscal Year 2018 Moving to Work Plan details how Home Forward intends to use our flexibility. We will continue to use our MTW authority to best meet the needs of our community, with thoughtful intent, and the ability to quickly respond to changes in our region’s rental market and economy. Home Forward will continue to collaborate with local government and community service providers to expand and sustain housing resources for the community. These partnerships and Home Forward’s MTW flexibility are more important than ever as the Portland Metropolitan Area continues to experience a housing crisis, a crisis the Portland City Council recently extended through at least October 2017.

## Overview of the Agency's Long-Term MTW Goals and Objectives

Home Forward has developed and adopted a new strategic plan to guide our work through 2020. The development of the strategic plan included input from staff, the board of directors, our Resident Advisory Committee and partners. The plan focuses on five key areas and includes an emphasis on equity, connection, unity and racial justice.

One Portfolio: We'll continue to build and acquire housing with a goal of adding 500 affordable housing units to Home Forward's portfolio by 2020. We will convert our public housing properties to a Section 8-based subsidy while performing critical rehabs to best position them to be stable for generations to come and to meet the needs of the people and neighborhoods they serve. We will also develop and implement performance standards at the property level and across the portfolio.

One Resource: We will work to create deeper connections and continuity between the types of housing assistance we provide to respond to the evolving needs of the people we serve. We'll make changes to the way we manage our waiting lists to better meet the needs of the community in the current housing market. In an effort to make ourselves more available to the community and to better align staff resources and processes, we'll explore a new model of service delivery that puts more of our staff in the neighborhoods we serve.

One Agency: We will build our skills and work together in ways that help us constantly evolve and improve our ability to serve our community. As we move forward with our public housing conversion through the Rental Assistance Demonstration (RAD) program, we will prepare ourselves for the implications of converting our portfolio to a Section 8-based platform. We will create and implement a values-based communications plan, increase the use of surveys, focus groups and other forms of outreach to get resident input, assess current practices to identify opportunities to integrate a trauma-informed lens to our work, and increase hard skills training and leadership development for staff at all levels of the organization.

One Community: We will continue to define our equity platform with a particular emphasis on racial justice. Identify opportunities and set goals to increase participation of Minority, Women and Emerging Small Businesses (MWESB) in our contracting processes. Optimize our use of technology to increase the community's ability to interact and transact with us, and work to

increase resident access to technology. We'll deepen our focus on supporting the needs of East Multnomah County and ensure the region is included in all of our strategic initiatives.

One System: We will leverage our role as the largest provider of affordable housing in Oregon to improve collaboration and efficacy between systems impacting people in poverty. We'll strengthen our engagement with the education and health care systems, and we will work tirelessly to add more affordable housing in our community, regardless of our role or ownership stake.

## Overview of the Agency's Moving to Work Goals and Objectives for the Year

The Portland metro region continues to experience a challenging housing market in terms of unprecedented rent increases and historically low vacancy rates. As a reaction to the state's housing rental crisis, the Oregon state legislature passed several bills in 2016 related to housing and the City of Portland extended our declared housing emergency until at least October 2017.

Home Forward recognized the signs of the looming crisis years ago and proactively implemented Moving to Work activities to assist Housing Choice Voucher holders and residents in past MTW plans. We were able to optimize our MTW flexibility in critical ways early on in our region's housing emergency and we are closely monitoring those activities to ensure they are assisting our participants in the most effective ways possible. Because Home Forward utilized our MTW authority in response to concerning market indicators in past MTW plans, we are not proposing any new activities in the FY2018 MTW plan. Instead, we will continue to monitor and evaluate our current activities and our community's housing market. Based on findings and changes in the market, we may propose new MTW activities as amendments to this plan if and when new opportunities, strategies or partnerships present themselves.

Home Forward's recently adopted strategic plan was developed during our region's housing emergency and every initiative was designed through the lens of this crisis. We have taken a bold yet thoughtful approach to the next four years and our staff and leadership will stretch their capacity to help our community through these difficult times.

We are also intentionally dedicating organizational capacity towards the U.S. Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. Home Forward is in the process of converting our public housing portfolio to a Section 8-based platform through RAD, a tool that enables the preservation of this critical affordable housing infrastructure for generations to come. This effort will create a significant body of work for the entire organization for years to come. The subsidy conversion transitions the public housing portfolio to a more stable funding source and will give Home Forward the ability to rehabilitate buildings and address long-standing capital needs while continuing to serve the same vulnerable population. We recognize RAD impacts our current residents

who call our buildings home and additional organizational capacity will be required to effectively communicate and prepare them for the transition.

## Overview of Home Forward's Current MTW Activities

01 Rent Reform.....	35
Home Forward has implemented large scale reform of our rent calculation.	
02 GOALS – Home Forward’s family economic opportunity program .....	41
Home Forward has aligned its economic opportunity programs into one consolidated, locally tailored program.	
03 Local Blended Subsidy.....	47
Home Forward has created a local blended subsidy program, blending Section 8 and public housing funds to subsidize units.	
06 Alternate inspection requirements for partner-based programs .....	49
Home Forward uses alternate inspection standards for programs where we contract our resources to be administered by partners.	
07 Landlord self-certification of minor repairs .....	51
In cases where we deem it appropriate, Home Forward may accept an owner’s certification that repairs have been made.	
08 Inspection and rent reasonableness at Home Forward-owned properties .....	53
Home Forward sets rent reasonableness and inspects the unit when a voucher holder selects a unit we own.	
09 Measures to improve the rate of voucher holders who successfully lease up .....	55
Home Forward has implemented measures to improve landlord acceptance of Section 8 vouchers in the community.	
10 Local Project-Based Voucher program .....	58
Home Forward has created a local project-based voucher program that is tailored to meet the needs of our community.	
11 Align utility allowance adjustment process.....	64
Home Forward has aligned the utility allowance adjustment process for public housing and Section 8.	
12 Alternative initial Housing Assistance Payment policy (Closed) .....	76
Home Forward will allow the initial inspection to take place after the effective date of the rental contract.	
13 Broaden range of approved payment standards .....	65
Home Forward will have the flexibility to establish payment standards between 80% and 120% of Fair Market Rents.	

14 Program Based Assistance ..... 69  
 Home Forward has designed a program that offers time limited rent assistance to help families access and/or retain stable housing.

15 Tenant-based voucher set aside policies..... 72  
 Home Forward sets aside vouchers with limited preferences which are aligned with supportive services for increased success.

All MTW Activities Table	Year Approved	Year Implemented	Status
P1-Alternate Rent Calculation for Public Housing Units at Rockwood Station, Martha Washington, and Jeffrey	FY2011	FY2011	Closed in FY2012
P2 - Limiting Portability in Higher Cost Areas <sup>1</sup>	FY2013	Never implemented	Never implemented
P5- Limits for Zero-Subsidy Participants	FY2010	FY2010	Closed in FY2012
01 Rent Reform	FY2012	FY2012	Active
02 GOALS	FY2014	FY2014	Active
03 Local Blended Subsidy	FY2012	FY2012	Active
04 Bud Clark Commons	FY2010	FY2010	Closed in FY2014
05 Biennial Inspections	FY2008	FY2008	FY2015
06 Alternative Inspection Requirements for Partner Based Programs	FY2012	FY2012	Active
07 Landlord Self-Certification of Minor Repairs	FY2013	FY2013	Active
08 Inspections and Rent Reasonableness at Home Forward-owned Properties	FY2013	FY2013	Active
09 Measures to Improve the Rate of Voucher Holders Who Successfully Lease up	FY2010	FY2010	Active
10 Local Project-Based Voucher Program	FY2012	FY2012	Active
11 Align Utility Allowance Adjustment Procedures	FY2011	FY2011	Active
12 Alternative Initial Housing Assistance Payment	FY2015	Never Implemented	Closed in FY2017

<sup>1</sup> It was determined administrative costs could exceed savings of implementing activity.

13 Broaden Range of Approved Payment Standards	FY2015	FY2015	Active
14 Program Based Assistance	FY2015	FY2015	Active
15 Tenant-Based Voucher Set Aside Policies	FY2017	FY2017	Active

### Overview of Non MTW Activities

Home Forward's goals and objectives for FY2018 includes efforts that are key to continuing to be innovative in the ways we serve our community.

### Regional Efforts

Home Forward has been working closely with our three neighboring housing authorities. The goal is to identify and pursue strategies that are regional in nature and increase residents' abilities to view the Portland Metro area as a single region with respect to housing, jobs, and education. We have several activities under this umbrella:

- Sharing jurisdiction with Clackamas County – Since July 2012, Home Forward and the Housing Authority of Clackamas County (HACC) have been testing the impact of sharing jurisdictions. Sharing jurisdictions has allowed families with vouchers from either housing authority the flexibility to use their voucher within Multnomah or Clackamas County without going through the portability process. While this effort has not required MTW authority, Home Forward has pursued this activity with the hope of increasing administrative efficiency by reducing workload related to portability, as well as increasing housing choice for families. Effective July 31, 2015, 144 Home Forward families were living in Clackamas County with 56% of those living in low-poverty areas. There are also 126 Housing Authority of Clackamas County participants who have taken advantage of the shared jurisdiction and moved to Multnomah County. In October 2015 HUD determined the agreement was making HACC out of compliance with HUD regulations due to HACC not being an MTW agency; therefore, Home Forward's payments standards were outside HACC's allowable range and a higher threshold of gross income was used to determine affordability for the family share. Due to this difference, the Memorandum of Understanding changed. During this year 10 families a month from each housing authority living in the other jurisdiction will be ported out to that jurisdiction. It is anticipated porting will be complete in spring of 2017. Home Forward continues to partner with the Housing Authority of Clackamas County with both agencies providing quality control inspections for the other (see Activity 08 Inspections and Rent Reasonableness at Home Forward Owned Properties. In June 2017, Home Forward and Clackamas County Housing Authority exchanged the last of the files to dissolve the MOU which allowed the participants to lease up in the other Housing Authority's jurisdiction without accessing the portability process. The transfer processes are expected to be completed and the files absorbed by the respective Housing Authority effective September 1, 2017.
- Mobility Counseling and Transportation Toolkit -In 2013, Home Forward was awarded a grant from Metro, a regional governmental planning agency, to work collaboratively with the three metro-area housing authorities to develop tools to provide mobility counseling to Housing Choice Voucher participants. The goal is to reduce participants' combined housing and transportation costs and assist them in identifying housing locations with affordable transit options. This work also achieves goals to further Fair Housing goals. Since April 2014, each housing

authority introduced the transportation toolkit to participants when they move or attend the initial program orientation. The online and paper toolkit includes a video, brochures for considering transportation costs when moving, a worksheet to compare transportation costs of housing choices, and a tutorial for using WalkScore. In August 2015, the evaluation of the project was completed. Due to the challenging rental market during the evaluation period, transportation costs and access did not show up as a significant indicator of housing choice. Nonetheless, participants that were shown the toolkit did report better access to transit in their new home and that their housing costs decreased. In December 2015, the Mobility Counseling grant was closed out with Metro. At the project's end, each housing authority made a commitment to maintain access to the toolkit on their website and continue to introduce the toolkit to new participants at program orientations and current participants at the time of moving. The online and paper toolkit includes a video, brochures for considering transportation costs when moving, a worksheet to compare transportation costs of housing choices, and a tutorial for using WalkScore. Since January 1, 2016, Home Forward's "Learn About Transportation Costs" webpage, where the toolkit is available, has had 1,331 visits.

### **Saint Francis Park Apartments**

Home Forward is serving as developer in partnership with a local non-profit, Catholic Charities, and a local parish in order to build affordable housing on land formerly owned by the parish. Catholic Charities will be the owner and operator upon completion. 102 units, affordable to households below 60% MFI, will be made available in this highly desirable neighborhood located in inner southeast Portland, close to jobs, transportation and neighborhood amenities. Programming by Catholic Charities will also ensure services for approximately 25 of the households, including supports for women and children who have experienced homelessness and/or domestic violence. Construction completed in June 2017. The St. Francis Park Apartments received temporary certificates of occupancy on May 26, 2017 and permanent certificates of occupancy on August 21, 2017. Construction work will continue on the Francis and Clare Commons (outdoor improvements on the adjacent vacated Oak Street) through September, 2017 and then we will work to close-out the construction contracts. The property was 100% leased in July, 2017.

### **Framework Apartments**

Home Forward is collaborating in a partnership that will develop an innovative, 12-story urban building highlighting five floors of affordable rental housing (60 units) for households at 60% MFI and below. The building will also include ground-floor retail and six-floors of retail offices and is located in Portland's downtown "Pearl District" – one of Portland's most desirable (and expensive) mixed-use neighborhoods. The building is designed as a wood framed building constructed primarily of an innovative structural system plus a wood product termed Cross Laminated Timber. It is supported by a \$1.5 million award from the U.S. Department of Agriculture's (USDA) Tall Wood Building Prize Competition. It represents an urban-rural connection that promotes use of domestically sourced and engineered wood products, thereby increasing demand from domestic rural lumber mills and boosting their local economies. Three condo structures will operate in the building with Home Forward serving as the general partner for the condo serving the five floors of affordable housing. Home Forward is also serving as the co-developer of the building along with a private development firm. Framework Apartments continue to go through due diligence and pre-construction activities with an anticipated November 2017 financial closing and the anticipated beginning of construction. We've selected our construction and permanent lender, received private activity bond volume cap, submitted pre-applications for tax credits and received notice that permits are ready for issue. We are negotiating with the tax credit investor and applying for "fundraising" support to fill out development sources. The commercial portion has selected investors and lenders and is working through due diligence items toward a simultaneous closing in November 2017. The construction is expected to take 12-14 months to complete and lease-up is expected to take four months.

## VASH Households

Veterans Affairs Supportive Housing (VASH) vouchers are an important and valuable resource for homeless veterans in our community. Since our original award of 70 vouchers in FY2009, Home Forward has received additional awards representing an increase of 735%. Most recently, Home Forward was awarded 60 new VASH vouchers and 6 project-based VASH vouchers with an effective date of June 1, 2016. With this additional award our total will be 591 vouchers. We are proud to administer these vouchers for veterans in our community.

Our March 2016 VASH utilization level was up to 93%. With the June 2016 award, our utilization has dropped as we work with the VA and community partners to lease-up these new vouchers. As of September 2016, our utilization is at 88%.

Our ability to effectively increase the scale of our VASH program in the face of an incredibly tight rental market is testament to the success of our partnership with the local Veterans Administration Medical Center, Multnomah County, the City of Portland and a host of non-profit agencies including Transition Projects, our communities Supportive Services for Veteran Families recipient. Home Forward continues to provide security deposit assistance, and our jurisdictional partners, through the Joint Office for Homeless Services, funds additional flexible placement and retention assistance which can be used for any costs related to removing barriers related to lease-up, such as application fees, utility and housing debt, and transportation costs associated with housing search.

Our community, led by Multnomah County Chair Deborah Kafoury and City of Portland Mayor Charlie Hales, set and achieved the goal of housing 690 veterans experiencing homelessness in 2015. To achieve this goal, our community created a coordinated system designed to assure that veteran homelessness is rare, brief, and non-recurring, and no veteran is forced to live on the street and that every newly discovered veteran living on the streets is offered immediate access to shelter and crisis services, while permanent stable housing and appropriate supports are being secured. Key to our plan to end veteran homelessness is the full utilization of VASH, and to that end, Home Forward worked with our partners to implement the following strategies:

- Development and refinement of a dynamic “name registry” of veterans experiencing homelessness in order to facilitate outreach and connection to appropriate housing programs. The registry is continually updated. Home Forward recently received Extraordinary Administrative Fees from HUD for our VASH program to, in part, contract with Transition Projects to 1) engage veterans on the Veterans Registry (By Name List) that may be eligible for VASH to collect documentation necessary to do initial VASH eligibility screen (determine eligibility for VA health care); and 2) Provide engagement and support to Veterans on the VAMC’s VASH interest list designed to assist them in quickly gathering documentation necessary for voucher issuance and/or housing placement—verification of legal identity; documentation of social security numbers where necessary; documentation of age; income documentation; etc. This will speed the pace

at which the VA will be able to refer eligible veterans to Home Forward and limit instances where Home Forward must delay voucher issuance after referral from the VA.

- Targeted efforts to recruit landlords, led by City of Portland Mayor Hales and Multnomah County Chair Kafoury, coupled with increased support for housing providers renting to veterans exiting homelessness. These new supports include a landlord guarantee and a retention program that will provide after-hours support to landlords and veterans placed through our efforts.
- Home Forward provided priority access to more than 90 units within our affordable housing portfolio, as they become vacant, for veterans with VASH vouchers or other veteran assistance, such as Supportive Services for Veteran Families.
- Work with partners to utilize rapid rehousing programs, including Supportive Services for Veteran Families, as a bridge to VASH.

In fall of 2014 we requested authorization from the HUD Voucher Office to include VASH voucher holders in the application of approved MTW activities. In November and December 2014, we received approval to apply the requested MTW activities to VASH voucher holders. In August 2016, we requested authorization to apply to VASH aspects of our local MTW Project Based Voucher program together with new MTW activities included in our FY 2017 plan.

### **A Home for Everyone**

A Home for Everyone is a community-wide effort to better assist people experiencing homelessness in Multnomah County. Established through a charter adopted by Home Forward, Multnomah County, and the cities of Portland and Gresham, A Home for Everyone is led by an executive committee comprised of jurisdictional and funding partners and supported by a coordinating board comprised of a diverse set of community, nonprofit and government stakeholders. By charter, Home Forward has a seat on the Home for Everyone Executive Committee. Through our participation in A Home for Everyone, Home Forward works to strategically align our resources with the community's larger efforts to address homelessness.

In 2014, the Home for Everyone Coordinating Board developed staged action plans related to community efforts to address homelessness. This included an actionable plan to end veteran homelessness, an assessment of housing needs and gaps for people experiencing homelessness, and a plan to reduce the gap by 50% by July 2017. In response to action plans developed by a Home for Everyone, Home Forward committed to new targeting of Housing Choice Vouchers in two areas:

1. A limited preference for up to fifty vouchers for veteran families that are ineligible for Veterans Affairs Supportive Housing vouchers.
2. A limited preference for up to 200 vouchers for families assisted through Multnomah County's Homeless Family System of Care.

These preferences were fully utilized in FY 2017. Home Forward is evaluating the impact of these preferences and may continue or expand these efforts utilizing the Tenant-Based Voucher Set Aside activity approved with our FY 2017 Moving to Work Plan.

### **High Rise Preservation Efforts: 85 Stories**

As part of our Strategic Plan goal, One Portfolio, we will increase the number of housing units for our community through preservation, development and acquisition, Home Forward has started by focusing on renovating the agency's ten high-rise public housing buildings. The ten high-rises provide 1,232 housing units. They serve some of our most vulnerable community members: seniors and persons with disabilities. The buildings are well located and worthy of preservation. Home Forward formulated a financing strategy for the improvements, grouping the work into two phases with the most critical needs addressed first. Home Forward can consider two options in converting the public housing properties to Section 8 rent assistance: HUD's Section 18 demolition and disposition process or the Rental Assistance Demonstration (RAD), which could transition properties to either project-based vouchers or project-based rental assistance.

Phase I (The first four high rise towers): HUD approved our proposal to change the operating subsidy at four of the buildings from public housing to project-based Section 8 funding (via a Section 18 disposition process). This subsidy change occurred during September 2013 and transfer to the LIHTC partnership (and the accompanying affordable housing lease up) happened during FY2015. The Phase I budget is approximately \$124.7 million. Because of the great importance of this work, the agency contributed a significant amount of its own resources to Phase I: \$13.6 million (11% of the total funding). Construction was completed during FY2017 at each of the first four properties (Northwest Tower & Annex, Gallagher Plaza, Hollywood East, and Sellwood Center).

Phase II (the next six high rise towers): The campaign to preserve the remaining six high-rise buildings is intensifying now that work is complete on Phase I. Home Forward is advocating a Section 18 Disposition strategy for the remaining six properties. These properties were submitted as part of a Rental Assistance Demonstration (RAD) program strategy if Disposition approval is not granted. (See additional information under section "Public Housing Strategy").

To complete the RAD and Section 18 conversions to project-based Section 8, we have developed a financial strategy that allows the agency to complete the process by FY2021 by converting public housing in groups (or bundles) of properties. As of writing this Plan, Home Forward working with HUD staff to negotiate the timing of these conversion processes and the resulting bundles and awaiting decisions on our applications for Section 18 disposition on nine properties.

### **Public Housing Strategy**

Home Forward operates 1,816 apartment homes as public housing, a specific subset of affordable housing that receives federal operating subsidy and capital funding. The buildings, and the deep rent subsidies they provide, are an important resource for Home Forward and the people we serve. Unfortunately, given waning federal support, mounting capital needs, and growing demand for affordable housing, the public housing program itself severely limits our ability to reinvest in these homes and meet the preservation challenges each apartment community faces. The reality is the ongoing viability of this community resource is in jeopardy.

It is in the best interests of our residents, and the properties they call home, for Home Forward to pursue a transition from public housing subsidy to a type of Section 8 rent assistance for all of Home Forward's public housing communities. Section 8 provides more stable operating funding and allows Home Forward to use a conventional real estate model that leverages equity and debt to make vital and significant capital improvements.

The process to convert public housing properties to Section 8 began with our 85 Stories effort to preserve our high-rise public housing communities. We are continuing plans to make the change for the rest of our public housing portfolio. Home Forward can consider two options in converting the public housing properties to Section 8 rent assistance: HUD's Section 18 demolition and disposition process or the Rental Assistance Demonstration (RAD), which could transition properties to either project-based vouchers or project-based rental assistance.

Several important policies will guide us as we undertake this complex and challenging initiative. We developed these policies through our work over the last 15 years, starting with our first HOPE VI redevelopment, to preserve this vital community resource.

#### **Policy Guidelines for Subsidy Conversion**

- 1) Continue to serve very low-income populations in these communities
- 2) Maintain ownership or control of the properties
- 3) Improve the physical and financial condition of the properties
- 4) Partner to optimize public and private resources on behalf of the properties and our residents

**RAD 1** - In May 2015 Home Forward submitted six Rental Assistance Demonstration (RAD) applications for six properties<sup>1</sup>, with a total of 285 public housing units. We received six initial Commitments to enter into a Housing Assistance Payment (CHAPs) in September 2015, with amended CHAPS issued in March 2016. As a result, Home Forward is hoping to close the conversion process during winter FY 2018 for these public housing units to project-based vouchers. As most of these properties are either newer construction or have had significant rehab in the recent past, construction activities are not currently planned.

**RAD 2** - In August 2016 Home Forward received CHAPs for RAD conversions at the following 24 properties, totaling 503 units. Work is underway with HUD to develop a financial bundling strategy and timeframe for these conversions. Home Forward has submitted a proposal to HUD, at time of the writing of this Plan, that requests conversion of the 24 properties to take place over the next four years, allowing Home Forward to prepare staff, residents, and participants for the changes due to RAD. Indicated in the list below are the properties Home Forward anticipates converting from public

---

<sup>1</sup> RAD 1 properties: The Jeffrey, Rockwood Station, Martha Washington, Bud Clark Commons, Madrona Place, and Fairview Oaks and Woods.

housing to project-based subsidy during FY2018 (4/1/2017-12/31/2018). Any changes to the order of conversion will be updated in subsequent MTW Plans and MTW Reports.

AMP (PH units)	Property Name	Total Public Housing Units in CHAPS	Conversion FY18	Conversion Post FY18
OR002000237	Powellhurst*	34	34	
OR002000121	Fir Acres*	32	32	
OR002000337	Alderwood*	20	20	
OR002000251	Tillicum North *	18	18	
OR002000151	Tillicum South*	12	12	
OR002000252	Hunters Run *	10	10	
OR002000122	Townhouse Terrace	32	32	
OR002000123	Stark Manor	30	30	
OR002000124	Lexington Court	20		20
OR002000125	Eastwood Court	32	32	
OR002000126	Carlton Court	24	24	
OR002000131	Slavin Court	24		24
OR002000132	Demar Downs	18	18	
OR002000138	Eliot Square	30	30	
OR002000142	Celilo Court	28	28	
OR002000152	Harold Lee Village	10	10	
OR002000153	Floresta	20	20	
OR002000203	Maple Mallory	48	48	
OR002000232	Bel Park	10	10	
OR002000236	Winchell Court	10	10	
OR002000332	Camelia Court	14	14	
OR002000336	Cora Park	10		10
OR002000436	Chateau Apt.	10		10
OR002000705	Scattered East A	7		7

Total                      503                      432                      71

Home Forward’s three HOPE VI properties (containing seven mixed-finance partnerships) will also convert to project-based Section 8 subsidy in the future, totaling another 506 units.

**Section 18 Disposition** - Home Forward anticipates decisions from HUD about Section 18 disposition for an additional nine properties. In addition to the six remaining high-rise towers containing 577 units (Phase II of our 85 Stories initiative), three additional properties (Peaceful Villa, Dekum Court, and Tamarack) with 230 units are part of our second Section 18 application. Home Forward and HUD have set an outline at this time to begin Section 18 disposition for five of nine properties. The properties Home Forward would like to start Section 18 disposition for fiscal year 2018 are Medallion, Williams, Tamarack, Schrunk Riverside Tower, and Dahlke Manor, totaling 544 units.

AMP	Property Name	Total Public Housing Units
OR002000114	Dahlke Manor	115
OR002000139	Medallion Apartments	90
OR002000118	Williams	101
OR002000113	Tamarack	120
OR002000117	Schrunk Riverside Tower	118
	<b>Total</b>	<b>544</b>

AMP	Property Name	Total Public Housing ACC Units	Units in Section 18	85 Stories Applications	Additional Section 18 applications
OR002000108	Peaceful Villa	70	70		1
OR002000111	Dekum Court	40	40		1
#N/A	Dekum Addition		20		
OR002000114	Dahlke Manor	115	115	1	
OR002000113	Tamarack Apts.	120	120		1
OR002000115	Holgate House	80	80	1	

	Schrunk Riverside				
OR002000117	Tower	118	118	1	
OR002000118	Williams Plaza	101	101	1	
OR002000139	Medallion Apts.	90	90	1	
OR002000140	Ruth Haefner Plaza	73	73	1	
	<b>Total</b>	<b>807</b>	<b>827</b>	<b>6</b>	<b>3</b>

## General Housing Authority Operating Information

### Housing Stock Information

#### MTW Public Housing Units

Public housing units at beginning FY2018	1,816
Planned public housing units added	0
Planned public housing units removed via RAD	- 938
Planned public housing units removed via Section 18	<u>- 544</u>
<b>Public housing units projected at end of FY2018</b>	<b>334</b>

#### MTW Housing Choice Vouchers (HCV) Units

MTW HCV authorized at beginning FY2018	8,418
Planned vouchers added/removed	<u>0</u>
<b>MTW HCV projected at end of FY2018</b>	<b>8,418</b>

MTW RAD project-based vouchers at beginning of FY2018	0
Planned project-based vouchers added via RAD	<u>+ 938</u>
<b>MTW RAD vouchers projected at end of FY2018</b>	<b>938</b>

MTW HCV project-based at beginning of FY2018	2,326
Project-based units added (see page 18-22)	+174
Project-based units added via Section 18 (page 21)	+ 544
Project-based units removed	- 0
MTW RAD project based vouchers projected at end of FY2018	<u>+ 938</u>
<b>MTW HCV Project-based units projected at end of FY2018</b>	<b>3,982</b>

#### Non-MTW Housing Choice Vouchers units authorized

Voucher Type	Projected Units Authorized
--------------	----------------------------

SRO/MODS	512
Veterans Affairs Supportive Housing (VASH)	591 <sup>1</sup>
Family Unification Program	100
Opt-Out vouchers	--

Planned New Public Housing Units to be Added During the Fiscal Year											
AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A-0	0	0	0	0	0	0	0	0-	N/A	0	0
Total Public Housing Units to be Added									0		
* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other											
If Other, please describe: N/A											

<sup>1</sup> Includes 6 project-based VASH vouchers

Planned Public Housing Units to be Removed During the Fiscal Year

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
OR002000121 – Fir Acres	32	Rental Assistance Demonstration- received CHAPs (Commitment to Enter into a Housing Assistance Payments Contract) from HUD in August 2016.
OR002000151- Tillicum South	12	
OR002000252- Hunter's Run	10	
OR002000237- Powellhurst	34	
OR002000251-Tillicum North	18	
OR002000337- Alderwood	20	
OR002000118 Williams	101	
OR002000152 Harold Lee Village	10	
OR002000153 Floresta	20	
OR002000113 Tamarack	120	
OR002000332	14	

Camelia Court	
OR002000138 Eliot Square	30
OR002000117 Schrunk	118
OR002000203 Maple Mallory	48
OR002000232 Bel Park	10
OR002000236 Winchell Court	10
OR002000122 Townhouse Terrace	32
OR002000123 Stark Manor	30
OR002000125 Eastwood Court	32
OR002000126 Carlton Court	24
OR002000132 Demar Downs	18
OR002000142 Cello Court	28
OR002000114 Dahlke	115
OR002000058 Humboldt Gardens	100
OR002000066 Stephens Creek Crossing North	64
OR002000065 Stephens Creek Crossing South	45
OR002000305 Haven Limited Partnership	29

Rental Assistance Demonstration- received CHAPs (Commitment to Enter into a Housing Assistance Payments Contract) from HUD in 2016.

Section 18

Rental Assistance Demonstration- received CHAPs (Commitment to Enter into a Housing Assistance Payments Contract) from HUD in 2016.

Section 18

Rental Assistance Demonstration- received CHAPs (Commitment to Enter into a Housing Assistance Payments Contract) from HUD in 2016.

OR002000310 Cecelia Limited Partnership	72	
OR002000315 Trouton Limited Partnership	125	
OR002000325 Woolsey Limited Partnership	71	
OR002000060 Rockwood Station	25	
OR002000061 The Jeffrey	20	
OR002000062 Martha Washington	25	
OR002000063 Bud Clark Commons	130	
OR002000064 Madrona Place	45	
OR002000320 Fairview	40	
OR002000139 Medallion	90	
<b>Total Number of Units to be Removed</b>	<b>1,767</b>	<b>Section 18</b>

New Housing Choice Vouchers to be Project-Based During the Fiscal Year	
Property Name	Description of Project

Anticipated Number of  
New Vouchers to be  
Project-Based \*

St. Francis Park Apts.	9
Hill Park Apts.	10
John Garlington Apts	10 PBV & 10 VASH
Woody Guthrie	15
North Williams site	40
NW Raleigh	40
Grant Warehouse	20
72 <sup>nd</sup> and Foster	20
Fir Acres	32
Tillicum South	12
Hunter's Run	10
Powellhurst	34
Tillicum North	18

<p>New construction. Waitlist will be for small family size units; 3 studios and 6 one-bedroom units.</p> <p>New construction. Waitlist will serve people with disabilities; 4 studios and 6 one-bedroom units.</p> <p>New construction. Waitlist will serve people with disabilities; 20 one-bedroom units.</p> <p>New construction. Waitlist will serve families with children and are experiencing low income; 7 two-bedroom and 5 three-bedroom units.</p> <p>New construction. Waitlist will serve families experiencing low income; 7 one-bedroom, 21 two-bedroom, and 12 three-bedroom units.</p> <p>New construction. NW Raleigh will serve families experiencing low income; with one, two, and three bedroom units.</p> <p>New construction that will offer family size units.</p> <p>New construction that will offer studio, one and three bedroom units.</p>
<p>Rental Assistance Demonstration- received CHAPs (Commitment to Enter into a Housing Assistance Payments Contract) from HUD in August 2016. Through that process, these units will be converted from public housing to project-based vouchers.**</p>

Alderwood	20
Harold Lee Villiage	10
Floresta	20
Camelia Court	14
Eliot Square	30
Maple Mallory	48
Bel Park	10
Winchell Court	10
Townhouse Terrace	32
Stark Manor	30
Eastwood Court	32
Carlton Court	24
Demar Downs	18
Celilo Court	28
Humboldt Gardens	100
Stephens Creek Crossing North	64

Rental Assistance Demonstration- received CHAPs (Commitment to Enter into a Housing Assistance Payments Contract) from HUD in August 2016. Through that process, these unites will be converted from public housing to project-based vouchers.\*\*

Stephens Creek Crossing South	45	
Haven Limited Partnership	29	
Cecelia Limited Partnership	72	
Trouton Limited Partnership	125	
Rockwood Station	25	
The Jeffrey	20	
Martha Washington	25	
Bud Clark Commons	130	
Madrona Place	45	
Fairview	40	
Woolsey Limited Partnership	71	
Schrunk Medallion Apartments	118	Section 18 Disposition. Through this process, these units will convert from public housing to project-based vouchers.
Williams	90	

Tamarack	101	
Dahlke	120	
	115	

**Anticipated Total New Vouchers to be Project-Based**

**1,941**

Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year

**3,979**

Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year

**3,880**

\*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.

\*\*At time of writing of this Plan, these are the properties Home Forward has requested to begin RAD Phase 2 conversion; awaiting approval from HUD.

## Other Changes to the Housing Stock Anticipated During the Fiscal Year

In the face of rapidly rising rents and decreasing housing affordability in Multnomah County, Home Forward has committed to help ensure that those we serve have access to all areas of our community. To aid these efforts, we will dedicate up to 500 Housing Choice Vouchers over the next several years to be used as project-based vouchers in developments that provide homes for families earning less than 30% of the area median income. Home Forward anticipates we will project base 174 vouchers in FY2018 as part of this commitment.

As described previously in the non-MTW activities section, Home Forward is pursuing a transition from public housing subsidy to a type of Section 8 rent assistance for all of Home Forward's public housing communities. In addition to the 6 properties approved for RAD in September 2015, we submitted an additional application for 31 properties in July 2015. We have received CHAPs (Commitment to Enter a Housing Assistance Payments Contract) for 24 of the 31 properties. Home Forward submitted a work plan to HUD in October 2016 to accept the CHAPs, and outlined a proposal for timeline of converting the 24 properties over 1-3 years. We also submitted a Section 18 Disposition proposal for 9 properties that is pending approval. When properties are approved to change subsidy, we will amend the MTW Plan as necessary.

With the requirement to convert our RAD properties within one year of receiving the Commitment to Enter a Housing Assistance Payments Contract (CHAP), we anticipate completing the project-based Section 8 conversion process in winter FY2018 for 1,223 public housing units at 19 public housing and affordable housing properties plus another 506 units at our HOPE VI properties.

Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

General Description of All Planned Capital Fund Expenditures During the Plan Year

**FY 2018 Planned Capital Expenditures**

Community	Activity	Scattered Site Sales Proceeds	Capital Fund	Asset Repositioning Fee (ARF)	Moving to Work Funds	Percentage of Capital Fund	Total Expended	Percentage of Total Expended
PHA Wide	20% Administrative Allowance	-	792,604	-	-	5.64%	792,604	3.68%
Dekum Court	Sewer Line Repairs	-	47,396	-	-	0.34%	47,396	0.22%
Tamarack	Mold Remediation	-	15,000	-	-	0.11%	15,000	0.07%
Tamarack	Emergency Sewer Repairs	-	40,000	-	-	0.28%	40,000	0.19%
Holgate House	Emergency Plumbing Repairs	-	280,000	-	-	1.99%	280,000	1.30%
Eliot Square	Exterior Brick Repairs & Flashing	-	153,000	-	-	1.09%	153,000	0.71%
Maple Mallory	Exterior Brick Repairs & Flashing	-	287,000	-	-	2.04%	287,000	1.33%
Maple Mallory	Door Entry System	-	24,000	-	-	0.17%	24,000	0.11%
Harold Lee	Comprehensive Rehab	-	1,800,000	-	-	12.80%	1,800,000	8.35%
Floresta	Roof Replacement	-	250,000	-	-	1.78%	250,000	1.16%
Medallion	Concrete Restoration	-	50,000	-	-	0.36%	50,000	0.23%
Celilo Court	Comprehensive Rehab	-	500,000	-	-	3.56%	500,000	2.32%
Powellhurst	Comprehensive Rehab	-	500,000	-	-	3.56%	500,000	2.32%
Fir Acres	Security Cameras	-	87,500	-	-	0.62%	87,500	0.41%
Stark Manor	Security Cameras	-	87,500	-	-	0.62%	87,500	0.41%
Tillicum North	New Playground	-	30,000	-	-	0.21%	30,000	0.14%
Fir Acres	Tree Removal	-	10,000	-	-	0.07%	10,000	0.05%
Various Properties	Flooring	-	15,000	-	-	0.11%	15,000	0.07%

Various Properties	Painting	-				1.96%		1.28%
Various Properties	PH Discretionary Funds	-	275,000	-	-	1.07%	275,000	0.70%
Various Properties	PH Portfolio Abatement	-	150,000	-	-	1.96%	150,000	1.28%
Various Properties	PH Portfolio Capital Needs Assessments	-	275,000	-	-	2.13%	275,000	1.39%
*Various Properties	Major Systems Upgrades - 85 Stories Projects	3,000,000	5,000,000	4,500,000	-		12,500,000	57.98%
						35.57%	0	
**Various Properties	RAD 1 Conversion	-	120,000	-	-	0.85%	120,000	0.56%
***Various Properties	RAD 2 Conversion (HOPE VI Properties)	-	140,000	-	-	1.00%	140,000	0.65%
***Various Properties	RAD 2 Conversion (PH Portfolio)	-	140,000	-	-	15.00%	140,000	9.78%
Debt Service	Trouton Bond Payments OR002D001B	-	2,108,479	-	-	5.13%	2,108,479	3.34%
			720,801	-	-		720,801	
						100%		100%
	<b>Total Capital Expenditures Budget</b>	3,000,000	14,058,280	4,500,000	-		21,558,280	
							0	

\*Note: The Major Systems Upgrades titled 85 Stories is planned for Home Forward's mid-rise towers.

\*\*Note: The RAD 1 Conversion is for the first CHAP received for conversion of six Home Forward properties from PH subsidy to PBV subsidy.

\*\*\*Note: The RAD 2 Conversion is for the second CHAP received for conversion of thirty-one Home Forward properties from PH subsidy to PBV subsidy. Groups 1 & 2 have been approved for disposition and are in post construction phase. The work were bundled into two tax credit entities. Group 1 is consisted of Gallagher Plaza and Northwest Tower. Group 2 is consisted of Sellwood Center and Hollywood East.

## Leasing Information

Planned Number of Households Served at the End of the Fiscal Year

MTW Households to be Served Through:

Planned Number of Households to be Served\*

Planned Number of Unit Months Occupied/Leased\*\*\*

Federal MTW Public Housing Units to be Leased	1,336	28,053
Federal MTW Voucher (HCV) Units to be Utilized	7,919	166,303
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	5	105
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	227	4,771
<b>Total Households Projected to be Served</b>	<b>9,487</b>	<b>199,232</b>

\* Calculated by dividing the planned number of unit months occupied/leased by 21.

\*\* In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.

\*\*\*Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

### Reporting Compliance with Statutory MTW Requirements

If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(D) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.

Not applicable. Home Forward is in compliance with statutory MTW requirements.

### Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Public Housing	There are no anticipated issues related to leasing public housing units.
MTW Housing Choice Voucher	We continue to experience a very tight rental market, making it difficult for voucher holders to find affordable housing. To support voucher holders in their search, we have been offering deposit assistance to participants that complete a tenant education class taught by a community organization.
Local, Non-Traditional Units	There are no anticipated issues related to local, non-traditional units.

Wait List Information

Wait List Information Projected for the Beginning of the Fiscal Year				
Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
MTW Public Housing	Site-Based	7,085	Partially Open	Yes
MTW Housing Choice Voucher	Community-Wide	3,000	Partially Open	No
MTW Housing Choice Voucher	Site-Based	10,966	Partially Open	Yes
Tenant-Based Local, Non-Traditional MTW Program	Other	0	Partially Open	Yes
Project-Based Local, Non-Traditional MTW Program	Site-Based	0	Closed	Yes

*Rows for additional waiting lists may be added, if needed.*

\* *Select Housing Program:* Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

\*\* *Select Wait List Types:* Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

\*\*\* For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

Our MTW Public Housing waiting list is currently closed except for households needing an ADA accessible unit or applicants who have a documented terminal illness with a life expectancy of less than 12 months. In FY2018 we anticipate opening the waiting list at four of our buildings designated for seniors and people with disabilities, as well as waiting lists at several family properties.

Our MTW Housing Choice Voucher tenant-based waiting list is community-wide, and is closed except for applicants to the Family Unification Program and those who have a documented terminal illness with a life expectancy of less than 12 months. Additionally, we have three program set-asides that are open to referrals to the waiting list. The programs serve Multnomah County's Homeless Family System of Care, veterans experiencing homelessness who are ineligible for VASH vouchers, and households at risk of displacement due to increasing rents.

Our MTW Housing Choice Voucher project-based voucher waiting lists are site-based and are partially open. There are 74 lists in the community, maintained by each building with its own preferences. Some of these lists are currently open, some are closed, and some are closed except to applicants who have a documented terminal illness with a life expectancy of less than 12 months.

If Local, Non-Traditional Housing Program, please describe:

Our Program Based Assistance program includes two areas: 1) Home Forward currently contracts funds to 18 partner agencies, which then manage the participant selection process, sometimes in partnership with Home Forward. Home Forward will be conducting a Request for Proposal process to select partners for Program-Based Assistance for the period starting July 2017; 2) Home Forward, together with Family Unification Program (FUP) partners, provides 6-month extensions (up to 54-months of assistance total including FUP assistance) for FUP youth participants who are engaged in services. [These activities are described in Activity 14.]

Project-Based Local, Non-Traditional MTW Program: Home Forward's New Doors program is program-based assistance for former foster youth who are working or are in school. Rent assistance is contracted to a local non-profit that specializes in working with homeless youth. Because this program houses only five people, the waiting list opens only when a vacancy is projected, and remains open for two weeks.

If Other Wait List Type, please describe:

Our Tenant-Based Local, Non-Traditional program is our Program Based Assistance program (described in detail in Activity 14). This program largely contracts funds to partner agencies, which then manage the participant selection process, sometimes in partnership with Home Forward. Each agency currently uses different methods for participant selection, but all programs target families who are homeless or at risk of homelessness. Some agencies use their rental assistance from Home Forward for more than one program and thus use more than one selection process within their agency in order to best target the resources to eligible households – these agencies are represented twice in the numbers below:

- 1 agency utilizes a waitlist - For families with children at Alder School.
  - 4 agencies offer rent assistance on a first-come-first-served basis to applicants who are already receiving services within their agencies. When funds become available, the next eligible client household to inquire receives the resources.
  - 7 agencies offer rent assistance on a first-come-first served basis to clients who are eligible for their other services, even if they aren't current clients with the agency (HIV+, homeless youth, parenting teens, domestic violence survivors, persons experiencing homelessness, and people eligible for addictions treatment). If no one meeting these criteria is awaiting the rent assistance, these agencies serve applicants from the "general public".
  - 7 agencies conduct accept new applicants from the "general public" several times a year, as funding becomes available.
- Home Forward will be conducting an RFP to select partners for much of the funding for our Program Based Assistance. Selected partners will establish tenant selection policies for assistance beginning July 2017.

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

There are no anticipated changes to the structure or policy of Home Forward's waiting lists.

# Proposed MTW Activities

## 16 - AFFORDABLE HOUSING GENERAL OBLIGATION BOND PROJECT BASED VOUCHER ALLOCATION

Home Forward is proposing an amendment to our Moving to Work plan to allocate up to 400 project based vouchers to support the goals of a \$258.4 million Portland Housing General Obligation Bond that was approved by voters in November of 2016. From time to time, local jurisdictions may issue general obligation bonds to acquire, develop and rehabilitate land and/or properties for affordable housing. Home Forward, as a Moving to Work agency, is granted the ability to support such local housing programs. This includes collaborating with local jurisdictions to provide affordable housing and services for low income and/or disabled households in our community.

Given that local jurisdictions may be the only owner of such housing when using general obligation bonds, *for this specific financing situation*, Home Forward is defining the ballot initiative as a competitive process. Ultimately, the local jurisdiction is competing for the use of vouchers and is seeking authorization from voters. If the voters elect to pass such a ballot measure, it is done so with the public’s knowledge that the sole owner of these properties must be the jurisdiction issuing the bonds. Home Forward will have permission to allocate project-based vouchers to such general obligation bond funded properties to ensure housing opportunities for very-low and extremely low-income families. Home Forward will measure the number of units made available to members of the community through utilization of this designation.

The Portland Housing Bond was designed to increase the affordable housing stock in a community with rapidly rising rents that limit choice for families living with low incomes. One of the location priorities of the Portland Housing Bond’s framework is to prioritize acquiring land for new housing in high opportunity areas with access to education and economic opportunities, among other amenities. The Portland Housing Bond’s framework includes recommendations for services related to “workforce skill development/employment resources and parenting resources, youth engagement and academic assistance” among other resident services’ priorities.

The Portland Housing Bond will create approximately 1,300 permanently affordable units throughout the City of Portland, with 600 designated for households earning 0-30% of the area median incomes. According to the City of Portland, the allocation of up to 400 vouchers to the affordable housing general obligation bond will leverage an additional 200 units of housing for families earning between 0-30% of the area median income, netting a total of 600 units of deeply affordable, permanent housing added to the City of Portland.

**MTW authorization:**  
Attachment C, Section D(7)(b) – Local Competitive Process

**Statutory objective:**  
Additional Units of Housing Made Available.

These permanent units will increase choice across the city for families living with low and extremely low incomes. The vouchers will be allocated over five to seven years as properties are acquired and built. On average, Home Forward anticipates that 57-70 vouchers will be deployed each year.

**Activity Metrics Information**

<b>CE #1: Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
N/A - No Expected Cost Savings	N/A - No Expected Cost Savings	N/A - No Expected Cost Savings	N/A - No Expected Cost Savings	N/A - No Expected Cost Savings

<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
N/A No Expected Staff Time Savings				

<b>HC #1: Additional Units of Housing Made Available</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
The Portland Housing Bond anticipates adding 1,300 units of affordable housing over a seven year period. The 400 vouchers will be used to leverage an additional 200 units being available for households earning	0	400	600	

between 0 and 30% median family income.				
--	--	--	--	--

Home Forward will measure the number of units made available to members of the community through the City of Portland’s Housing Bond reports to the community. Home Forward will measure the number of units made available to members of the community internally through utilization of this designation.

**MTW Flexibility**

Home Forward designates voter-approved affordable housing general obligation bond ballot measures as a competitive process. This is an additional waiver of 24 CFR 983.51. In Oregon, local jurisdictions may issue general obligation bonds. These bonds are secured by tax levies and provide communities with access to debt at favorable interest rates. Unlike other states, however, the Oregon constitution has language that prohibits jurisdictions from raising money to aid parties other than the issuing jurisdiction. In other words, in the State of Oregon, jurisdictions may only use general obligation bonds for capital costs incurred and owned by the issuing jurisdiction. This happens through a popular vote of the citizenry and can leverage 200 additional units of affordable housing made available to the community.

# Approved MTW Activities

## Implemented Activities

### 01 RENT REFORM

Approved FY2012, Implemented FY2012, Amended FY2014

This activity was originally approved and implemented in FY2012. In FY2014, an amendment to the activity was approved and implemented. Our FY2015 MTW Plan included three modifications, which have also been implemented. All amendments and modifications are included in the following full description of our rent reform activity:

In FY2012, Home Forward implemented a large-scale reform of rent calculation methods, applicable to all MTW public housing and Section 8 households, as well as VASH and FUP voucher holders. The simplified method distinguishes between the populations of seniors / people with disabilities and “work-focused” households. The fundamental premise is that deductions are eliminated from the subsidy calculation and the total tenant payment is determined using a percentage of gross income.

In early 2013, the federal government imposed sequestration: across-the-board reductions in federal funding. In response to these funding cuts, Home Forward amended the activity in FY2014 to increase the percentage of income used to calculate rent. The amended percentages are reflected below.

For **seniors and people with disabilities**, rent is calculated based on 28.5% of gross income. All deductions are eliminated and this group has triennial income re-certifications. We define those aged 55 and older as “seniors”, and households fall into this population category if the head, co-head or spouse listed on the lease is 55 or older, or is disabled under the current HUD definition used by Home Forward. This group has a \$0 minimum rent and utility reimbursements are allowed.

All households that do not fall into the population category above are considered **work-focused households**. All deductions are eliminated and this group has biennial income re-certifications. The percentages of income used to calculate the tenant portion of rent are as follows:

- **Years 1 and 2:** rent is based on 29.5% of gross income, with no minimum rent. Utility reimbursements are allowed.

#### **MTW authorization:**

Attachment C, Section B(3) – Definition of Elderly Family

Attachment C, Section D(3)(b) – Eligibility of Participants

Attachment D, Section B(2) – Rent Structure and Rent Reform

#### **Statutory objective:**

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient

- **Years 3 and 4:** rent is based on 29.5% of gross income or \$100 minimum rent, whichever is greater. Utility allowances are factored in the assistance, but utility reimbursements are not allowed.
- **Years 5 and 6, and biennially thereafter:** rent is based on 31% of gross income or \$200 minimum rent, whichever is greater. Utility allowances are factored in the assistance, but utility reimbursements are not allowed.

The following policies apply to all households:

- Zero-income households meet with their public housing site manager or Section 8 case manager every six months, so that staff can provide referrals to community service providers and check on progress towards obtaining an income source.
- The proration of subsidy for mixed-families is simplified so that a flat \$100 monthly reduction in assistance is applied to the household, regardless of the number of ineligible members.
- The ceiling rent for public housing is set to match Section 8 payment standards. There is no flat-rent option.
- Home Forward has created a separate “release of information” form to supplement the HUD Form 9886, in order to obtain a release of information that covers the appropriate biennial or triennial review cycle.
- For Section 8 households where the gross rent of the unit exceeds the applicable payment standard, Home Forward will approve the tenancy at initial occupancy so long as the household share does not exceed 50 percent of the household’s gross income.
- When a Section 8 household is approved to move and the identified unit has a gross rent that exceeds the payment standard, Home Forward will use the existing income verification on file to test for affordability. Home Forward will not require a re-examination to verify income for this purpose, unless the family requests it.
- When a Section 8 household reports a change in family size, if the household has resided in their unit for at least 12 months, Home Forward will require an interim review. Any changes to voucher size, payment standard and subsidy calculation will be effective 120 days after the interim review.
- The earned income disallowance is eliminated.
- All GOALS participants are included in the rent reform calculation.
- Home Forward uses actual past income to determine annual income for participant families.
- All income sources used to determine a household’s public housing rent or Section 8 assistance are the same as currently defined by HUD, with the following exceptions:

- The value of any asset or the value of any income derived from that asset is not used in the rent calculation, except when the asset makes regular payments (quarterly or more often) to the resident or participant. However, the value of assets or the value of any income derived from assets is used to determine initial eligibility. Home Forward allows households to self-certify assets with a net value of \$5,000 or less.
- All earned income of full-time students age 18 and over is excluded from the rent calculation, unless they are the head, co-head or spouse of the household.
- Student financial assistance is considered only for the purpose of determining eligibility. Student financial assistance is not used to determine annual income for rent and subsidy calculation.
- All adoption assistance payments are excluded from the rent calculation.
- Households have the option to not report income that is not used in the rent calculation, such as foster care payments. However, Home Forward will accept income reporting of such sources for use in determining affordability of a unit. Home Forward permits families to rent units where the family share is up to 50% of their gross income.
- Households may apply for a hardship review if their total monthly shelter costs exceed 50% of the total monthly income used to determine their rent subsidy. Section 8 participants who choose to rent housing where the total shelter costs exceed 50% of total monthly income at the time of initial lease-up in that unit will not generally qualify for hardship review; however, all households have the right to request a hardship and exceptions may be made. The committee has a menu of remedies to reduce a qualifying household's burden.

Rent reform has been fully implemented. At this time, all MTW public housing and Section 8 households, as well as VASH and FUP voucher holders, are on the rent reform calculation. The earliest group of work-focused households transitioned to the second level of rent payment beginning in FY2015, and is now subject to the \$100 minimum rent payment. Home Forward continues to monitor hardship requests, household and agency financial impacts and staff feedback to prepare for any changes that may need to be made to the activity. A rent reform analysis is being done to inform staff of the impact rent reform has to residents, participants, and how Home Forward does its work around rent calculation. The analysis will be shared at the next MTW report (FY17 MTW Report).

**Changes or Modifications:**

We are not anticipating any changes to this activity.

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	FY2011: \$140,228	FY2018: \$165,438	Less than \$227,500
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	FY2011: 5,340 hours	FY2018: 6,300	Less than 7,000
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity. Through our quality control process, every error that is identified is corrected.			
Average error rate in completing task	FY2015: 7.5%	FY2018: 7.5%	Maintain 7.5% or less
Increase in tenant share of rent (Standard Metric: CE#5)			
Total annual tenant share of rent	FY2012: \$25,342,942	FY2018: \$30,763,208	FY2018: \$30,763,208
Increase in household income (Standard Metric: SS#1)			
Average earned income of households	FY2011: \$3,324	FY2018: \$3,420	FY2018: \$3,420
Increase in positive outcomes in employment status (Standard Metric: SS#3) Note: Because Home Forward has implemented biennial and triennial review schedules, the number of households who report an increase in earned income each year is reduced.			
Number of heads of households who: 6) Other (defined as having an increase in earned income)	FY2011: 866 heads of households	FY2018: 500 heads of households	At least 500 heads of households annually
Percent of work-focused households who: 6) Other (defined as having an increase in earned income)	FY2011: 16% of work-focused households	FY2018: 16% of work-focused households	At least 16% of work-focused households
Households Removed from Temporary Assistance for Needy Families (TANF) (Standard Metric: SS#4)			
Number of households receiving TANF assistance	FY2012: 1,859 households receiving TANF (17.7%)	FY2018: 1,914 households receiving TANF (17.5%)	Less than 1,914 (17.5%) households receiving TANF

Metric	Baseline	Benchmark	Final Projected Outcome
Reducing the per unit subsidy costs for participating households (Standard Metric: SS#6)			
Average amount of subsidy per household	FY2012: \$524 per household	FY2018: \$575	Less than \$575 per household
Households transitioned to self-sufficiency (Standard Metric: SS#8)			
Number of households transitioned to self-sufficiency (Defined as households that have earned or permanent income that results in area median income (AMI) above 50% and/or that have voluntarily exited housing assistance)	FY2014: 521 households	FY2018: 500 households	At least 500 households annually
Displacement prevention (Standard Metric: HC#4) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not believe this metric is an accurate measure of this activity, but we have included it at HUD's request.			
Number of households at or below 80% AMI that would lose assistance or need to move	FY2011: 233 households	FY2018: 0 households	0 households are required to move due to choosing a unit where their share of rent is above 40%
Increase in resident mobility (Standard Metric: HC#5) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not use rent reform to impact mobility, but we have included it at HUD's request.			
Number of households able to move to a better unit and/or neighborhood of opportunity (defined as low poverty census tracts where poverty is below 18.5%)	FY2013: 3,092 (28.4%) households lived in better neighborhoods	FY2018: 3,281 households (approximately 30%)	At least 3,281 households (approximately 30%)

**Additional Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Maintain stability for seniors and people with disabilities			
Shelter burden (rent <sup>1</sup> + utility allowance divided by gross income) for seniors and people with disabilities	Before implementation, shelter burden was 27%	FY2018: Shelter burden will remain below 29%	Seniors and people with disabilities will maintain stability, with a shelter burden below 29%
Increased contribution to rent			
Total tenant payment (rent <sup>1</sup> + utility allowance) for work-focused households	Before implementation: Section 8 average - \$267 Public housing average - \$249	FY2018: Section 8 average - \$320 Public housing average - \$299	Maintain an average total tenant payment of at least \$320 for Section 8 and \$299 for Public Housing (15% above baseline)
Increased income in work-focused households			
Average income for work-focused households, as percentage of Median Family Income (MFI)	Before implementation, average income for work-focused households was 16.4% MFI	FY2018: 18.5% MFI	18.5% MFI

<sup>1</sup> For purposes of these metrics, Section 8 rents are calculated with gross rent capped at payment standard.

Home Forward’s YARDI database continues to serve as the source for household income and total tenant rent payment information. The baseline data for hours required to conduct rent calculation and income reviews was collected through staff interviews and workflow analysis. This process will be repeated in subsequent years to determine progress towards benchmarks and goals.

**MTW Flexibility:**

Home Forward has used our rent reform authorizations to eliminate deductions, simplify the rent calculation, change review schedules, and implement other policy adjustments that as a whole, make up our rent reform activity, as described above.

## 02 GOALS – HOME FORWARD’S FAMILY SELF-SUFFICIENCY PROGRAM

Approved FY2014, Implemented FY2014

In our FY2014 Plan, Home Forward proposed an activity to align existing self-sufficiency programs into one consolidated program, which we refer to as the GOALS (Greater Opportunities to Advance, Learn and Succeed) program. This program is tailored to meet the needs of our community and be efficient for staff to administer. GOALS program requirements are the same regardless of funding source, program or property, with a few minor exceptions for site-based programs.

The key elements of the GOALS program are as follows:

- The rent reform calculation (Activity 01) is used for all GOALS participants.
- Participants who are engaged in a designated program intended to increase the family’s economic independence (such as an employment or training program) will receive a preference on the GOALS waiting list. 100% of the GOALS slots may be filled with participants utilizing this preference.
- Home Forward will allow the GOALS contract to be in the name of any adult member of the household.
- The traditional escrow account used in HUD Family Self-Sufficiency (FSS) programs has been replaced with a managed savings account. Any rent paid by a participant household above \$350 (known as the “strike point”) will be placed into the managed savings account. The monthly amount placed into a family’s managed savings account is limited to the difference between the strike point and the family’s ceiling rent (for public housing families) or voucher payment standard (for Section 8 families).
- The length of time on the program will be five years, with the opportunity to extend for an additional two years. Eligibility for the two-year extension follows current policy and HUD guidelines.
- Participants graduate and have access to the funds in their managed savings account when they have completed their training plan and fulfilled the obligations identified in their contract.
- Families who leave the program prior to graduation will forfeit any money accrued in their managed savings account.
- Staff implementing the GOALS program will be funded by a combination of HUD-funded FSS Coordinator money, grant funding and agency budgeting. FSS Coordinator funds will be used only for FSS Coordinator salaries, as directed by the respective NOFAs.

**MTW authorization:**

Attachment C, Section E – Family Self Sufficiency Programs

Attachment C, Section B(1) – Single Fund Budget with Full Flexibility

**Statutory objective:**

Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient

- At properties where participation in GOALS was mandatory, the property will continue to utilize a site-based preference on the GOALS waitlist to encourage participation in the family self-sufficiency program at these sites.
- When a public housing resident reaches ceiling rent, or a housing assistance payment for a voucher participant drops to zero, deposits into the family's managed savings account will cease. Families can continue to participate in the program for an additional six months, but no savings will accrue during this time. If the family is still at ceiling rent or zero assistance after six months, they will graduate from the program. If the family's income decreases to a level that housing assistance is reinstated during that six-month period, they may begin to earn escrow again, and continue participation in the program as long as the contract determines they are still eligible.

**Changes or modifications:**

**Home Forward is adding the following modification to the GOALS activity.**

- GOALS participants who enroll in the Individual Development Account (IDA) program will be able to withdraw from their managed savings account up to \$700 per year, for a maximum of 3 consecutive years or \$2,100. In order to utilize managed savings account for IDA deposits, participants will need to be co-enrolled in GOALS and IDA programs. If a participant withdraws from the IDA program before successfully completing the IDA program, the IDA provider will refund the full managed savings account to Home Forward. By allowing participants the option to apply more restricted funds towards their IDA, the intent is to allow households to use their more readily accessible, or unrestricted, funds such as earned income tax credit (EITC) returns, to more immediate financial needs. This would permit financially vulnerable households to continue working towards long term financial investment while maximizing choice in how to best apply unrestricted funds towards any current financial obligations.

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not save costs through this activity, but we have included it at HUD's request.			
Total cost of task	FY2013: \$186,400	FY2018: \$539,244	Extended FY2018: \$525,000 <sup>1</sup>
Metric	Baseline	Benchmark	Final Projected Outcome
Staff time savings (Standard Metric: CE#2) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not save staff time through this activity, but we have included it at HUD's request.			

Total time to complete task	FY2013: 6,240	FY2018: 10,920	FY2018: 10,920 staff hours <sup>1</sup>
Decrease in error rate of task execution (Standard Metric: CE#3) Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity.			
Average error rate in completing task	FY2015: 2%	FY2018: 2%	Maintain 2% or less
Increase in resources leveraged (Standard Metric: CE#4)			
Amount of funds leveraged	FY2013: \$0	FY2018: \$539,244	FY2018: \$525,000 <sup>1</sup>
Increase in household income (Standard Metric: SS#1)			
Average earned income of households	FY2013: \$9,277	FY2018: 10,800	FY2018: \$10,800
Increase in household savings (Standard Metric: SS#2)			
Average amount of escrow of households	FY2013: \$1,292	FY2018: \$1,350	FY2018: \$1,300
Increase in positive outcomes in employment status (Standard Metric: SS#3) <sup>2</sup>			
Number of heads of households:	FY2013:	FY2018:	FY2018:
1) Employed full-time	1) 283	1) 195	1) 195
2) Employed part-time <sup>3</sup>	2) N/A	2) 125	2) 125
3) Enrolled in an educational program	3) 113	3) 130	3) 130
4) Enrolled in a job-training program	4) 69	4) 85	4) 85
5) Unemployed	5) 281	5) 260	5) 260
6) Other (defined as having completed an education or job training program)	6) 38	6) 55	6) 55

Metric	Baseline	Benchmark	Final Projected Outcome
Increase in positive outcomes in employment status (Standard Metric: SS#3) <sup>2</sup>			
Percentage of work-able households:	FY2013:	FY2018:	FY2018:
1) Employed full-time	1) 53%	1) 38%	1) 38%
2) Employed part-time <sup>3</sup>	2) N/A	2) 22%	2) 22%
3) Enrolled in an educational program	3) 20%	3) 25%	3) 25%
4) Enrolled in a job-training program	4) 12%	4) 25%	4) 25%
5) Unemployed	5) 47%	5) 40%	5) 40%
6) Other (defined as having completed an education or job training program)	6) 6%	6) 15%	6) 15%
Households removed from TANF (Standard Metric: SS#4)			
Note: This metric is measured as a point in time count, which does not account for individual households who give up TANF assistance, graduate from the GOALS program, and are then replaced by income GOALS participants who have not yet given up TANF assistance.			
Number of households receiving TANF assistance	FY2013: 126 households	FY2018: 118 households	FY2018: 118 households
Households assisted by services that increase self-sufficiency (Standard Metric: SS#5)			
Number of households enrolled in GOALS	FY2013: 564 households enrolled	FY2018: 600 households enrolled	Maintain enrollment of at least 600 households
Reducing per unit subsidy costs for participating households (Standard Metric: SS#6)			
Average amount of subsidy per household	FY2013: \$490.65 per household	FY2018: \$490 per household	Less than \$490 per household
Increase in tenant share of rent (Standard Metric: SS#7)			
Tenant share of rent	FY2013: \$986,971	FY2018: \$1,350,000	At least \$1,100,000 annually
Households transitioned to self-sufficiency (Standard Metric: SS#8)			
Number of households transitioned to self-sufficiency (Defined as households that have earned or permanent income that results in area median income (AMI) above 50% and/or that have voluntarily exited housing assistance)	FY2014: 30 households	FY2018: 40 households	At least 30 households annually

**Additional Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Increase in average income for exiting participants			
Increase in average participant earned income between enrollment and exit	Average earned income at time of GOALS enrollment for all current GOALS participants = \$8,745	Average earned income for all participants exiting (for any reason) in FY2018 -\$11,500 Average earned income for all participants successfully <u>graduating</u> in FY2018 – \$30,625	20% increase in average earned income between enrollment and exit  60% increase in average earned income between enrollment and exit for participants who graduate
Increase in average savings for exiting participants			
Increase in average participant managed savings account balance at exit from GOALS	Average managed savings account balance at entry to GOALS = \$0	Average managed savings balance disbursed to all participants exiting for any reason in FY2018 -\$2,400 Average managed savings balance disbursed to graduating participants in FY2018 – \$7,400	Average managed savings disbursed to program graduates each year will be at or above \$6,500
Increase in positive outcomes for exiting participants			
Percentage of households: 1) Employed full-time 2) Employed part-time 3) Enrolled in educational program 4) Enrolled in job training program 5) Unemployed 6) Other (defined as having completed an educational or job training program)	For 81 households exited in FY2013: 1) 40% 2) N/A 3) 9% 4) 2% 5) 50% 6) 14%	By FY2018: 1) 43% 2) 21% 3) 15% 4) 10% 5) 36% 6) 17%	By FY2018: 1) 43% 2) 21% 3) 15% 4) 10% 5) 36% 6) 17%

Exiting participants removed from TANF			
Percent of households giving up TANF at exit	FY2013: 24% of households who had TANF during participation had given up TANF at exit	FY2018: 38% of exiting households	At least 30% of families who had TANF during participation will have given up TANF at exit <sup>4</sup>

<sup>1</sup>Home Forward uses our MTW flexibility to include coordinators at our site-based programs in our overall GOALS FSS program. This is shown here as an increase in staffing costs and hours, since we're now able to include these costs under the combined program. In addition to site-based coordinators, there are 8 traditional coordinators supported via HUD-funded FSS coordinator funds.

<sup>2</sup>Households may be counted in more than one category in the employment statuses shown above. For example, a household may be considered unemployed while enrolled in an educational program.

<sup>3</sup>Home Forward did not track full-time vs part-time employment prior to implementation. For the purposes of this baseline metrics, all employed households were counted as employed full-time. We have updated these metrics with the part-time employment statistics.

<sup>4</sup>Households are required to give up TANF benefits in order to graduate. The percentage of households is pulled down due to families exiting the program without graduating.

**MTW Flexibility:**

Home Forward has used our authority to develop a family self-sufficiency program that meets the needs of our local community. This program is specifically designed to meet the statutory objective of giving incentive to our families to obtain employment and work towards becoming economically self-sufficient.

### 03 LOCAL BLENDED SUBSIDY

Approved FY2012, Implemented FY2012

Home Forward has created a local blended subsidy (LBS) program to improve the financial viability of adding “banked” public housing units back into the portfolio. Public housing operating subsidy alone is often insufficient to support bringing these units back to properties. The LBS program uses a blend of MTW Section 8 and public housing operating funds to subsidize units reserved for families earning 80 percent or below of area median income. These units may be new construction, rehabilitated, or existing housing.

The LBS program combines tenant paid rent, Section 8 funds, and public housing funds, resulting in a total per unit rent amount. Rents are set by an internal process to determine the amount of subsidy that will meet property needs, and are subject to completion of rent reasonableness tests. Home Forward uses the payment standard as the maximum rent for LBS units, or up to 125% of Fair Market Rents in the case of service-enriched units. This leveraging of resources allows for a more adequate revenue stream and increases the number of households that can be served.

Home Forward has utilized the LBS program for 284 units at three properties. This includes 130 units at Bud Clark Commons, 45 units at Madrona Place, and 109 units at Stephens Creek Crossing. No additional LBS units are planned at this time unless we dispose of additional public housing units in the future.

**Changes or modifications:** The only change is in terminology. Due to the transition of properties from public housing to RAD project-based Section 8 subsidy, two of our “RAD I” properties (Bud Clark Commons and Madrona Place) will be called out as “Obligations of MTW Initiative Funds (MIF)” in our list of planned activities. Stephens Creek Crossing has not yet received RAD authorization and will transition in future years.

**MTW authorization:**

Attachment C, Section B(1) – Single Fund Budget with Full Flexibility

Attachment C, Section C(2) – Local Preferences and Admission and Continued Occupancy Policies and Procedures

Attachment D, Section B(3) – Local Unit Based Subsidy Program

**Statutory objective:**

Increase housing choice for low-income families

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Additional units of housing made available (Standard Metric: HC#1)			
Number of new housing units made available for households at or below 80% AMI	Before implementation, 0 units made available	FY2018: 239 units made available	239 units made available
Units of housing preserved (Standard Metric: HC#2)			
Number of housing units preserved for households at or below 80% AMI	Before implementation, 0 units preserved	FY2018: 45 units preserved after full implementation	45 units preserved
Metric	Baseline	Benchmark	Final Projected Outcome
Increase in resident mobility (Standard Metric: HC#5)			
Number of households living in better neighborhoods (defined as low poverty census tracts where poverty is below 16%)	Before implementation, 0 households	FY2018: 109 households	109 LBS households located in better neighborhoods
Increase in resources leveraged (Standard Metric: CE#4)			
Amount of funds leveraged	Before implementation, \$0	FY2018: \$11,145,307	\$11,145,307 in leveraged debt, equity and increased services

**MTW Flexibility:**

This activity uses single fund budget flexibility and authorization to develop a local unit-based subsidy program in order to create the administrative and funding structure for LBS. This increases housing choice for low-income families by allowing Home Forward to add financially viable, subsidized units back into its portfolio. LBS has allowed Home Forward to leverage debt, equity and increased services at these three properties. Additionally, the ability to create local preferences, and admission and occupancy policies and procedures allows Home Forward to manage the units to provide similar protections as public housing and also adapt the rules for efficiency and local needs.

Home Forward understands and is committed to our obligation to continue to serve substantially the same number of families as if we had not participated in the MTW demonstration. We are aware of the pressure our LBS activity may place on the agency to continue to meet our baseline households served, and we carefully consider this information before moving forward with implementation strategies. We are continuing to explore and develop additional alternative options for local rent assistance programs that will serve a significant need in our community, and will also support our ability to meet our baseline households served once LBS is fully implemented.

**06 ALTERNATE INSPECTION REQUIREMENTS FOR PARTNER-BASED PROGRAMS**

Approved FY2012, Implemented FY2012

Home Forward aligns our housing resources with the services of jurisdictional and community partners in order to maximize impact and effectiveness. In an effort to reduce costs and increase efficiencies, Home Forward uses alternate inspection standards for programs where we contract out resources to be administered by partners. Rather than requiring full Housing Quality Standards (HQS) inspections, Home Forward requires that these units meet the habitability standards, unit inspection requirement, and lead-based paint visual assessment requirements of the US Department of Housing and Urban Development's Homelessness Prevention and Rapid Re-Housing Program. Staff from jurisdictional and community providers are able to arrange for and conduct required inspections themselves, in conjunction with other required visits to the assisted units, which is often more efficient and allows clients to move in faster than if they had to wait for a scheduled Home Forward inspection.

**Changes or modifications:** We are not anticipating any changes to this activity.

**MTW authorization:**  
Attachment C, Section D(5) – Ability to Certify Housing Quality Standards

**Statutory objective:**  
Reduce cost and achieve greater cost effectiveness in Federal expenditures

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	Before implementation, \$35,500	FY2018: \$0	\$0
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	Before implementation, 500 hours	FY2018: 0 hours	0 hours
Decrease in error rate of task execution (Standard Metric: CE#3)			
Note: Because this metric was established after implementation, Home Forward does not anticipate a change in the error rate.			
Average error rate in completing a task	FY2014: 4%	FY2018: Less than 5%	Less than 5%

**MTW Flexibility:**

Home Forward uses MTW authority to allow alternative inspection requirements for units assisted with rent assistance that we have contracted to community partners. These alternate inspection requirements ensure housing standards while increasing efficiency and cost effectiveness.

07 LANDLORD SELF-CERTIFICATION OF MINOR REPAIRS  
Approved FY2013, Implemented FY2013

In many cases, units may fail an initial or biennial inspection due to minor items, such as cracked socket plates or closet doors that are off track. Requiring a Home Forward inspector to make a trip back to a unit to verify such minor repairs is inefficient and costly. Home Forward has implemented a policy that in cases where there are no more than four minor deficiencies, we may accept an owner’s certification that required repairs were made. This allowance is made at Home Forward’s discretion, and in cases where all deficiencies are minor items as determined by an approved list maintained by Home Forward.

Allowing a landlord to self-certify a minor repair is left to each individual inspector’s discretion, and inspectors remain cautious and thoughtful about when the option is best utilized. Because of this, the activity has not yet produced the level of savings hoped for. However, the inspections supervisor continues to work with inspectors on identifying situations where the strategy can be employed to save additional staff time. Home Forward believes this activity is still an effective strategy for saving time and money.

**MTW authorization:**  
Attachment C, Section D(5) – Ability to Certify Housing Quality Standards

**Statutory objective:**  
Reduce cost and achieve greater cost effectiveness in Federal expenditures

**Changes or modifications:** We are not anticipating any changes to this activity.

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	Before implementation, \$140,092	FY2018: \$199,066	Less than \$210,000 to complete re-inspections
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	Before implementation, 1,326 hours	FY2018: 2,105 hours	Less than 3,500 hours

Decrease in error rate of task execution (Standard Metric: CE#3)

Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity.

Average error rate in completing a task	FY2015: 0%	FY2018: Less than 3%	Less than 3%
---	------------	----------------------	--------------

**MTW Flexibility:**

This activity uses alternate criteria, in the form of an owner’s written certification, to verify minor repairs in a unit that failed its initial or biennial HQS inspection as a result of four or fewer minor deficiencies. This policy increases efficiency, and saves the agency the cost of these re-inspections.

**08 INSPECTIONS AND RENT REASONABLENESS AT HOME FORWARD-OWNED PROPERTIES**

Approved FY2013, Implemented FY2013

Home Forward owns over 5,000 units of affordable housing in Multnomah County. Many of these units have project-based Section 8 vouchers attached, and additional units are rented to families that are utilizing tenant-based Section 8 vouchers. In cases where a voucher holder is renting a unit we own, Home Forward utilizes our own staff to perform inspections and determine rent reasonableness.

In cases where Home Forward both owns and manages the unit, we hire a third party to conduct quality control inspections and rent reasonableness testing at a sample of these units. This ensures standards are being met while mitigating any conflict of interest. Since the implementation of this activity, 100% of quality control inspections reported the same result as the Home Forward inspection, and no problems have been identified with rent reasonableness.

**Changes or modifications:** We are not anticipating any changes to this activity.

**MTW authorization:**  
Attachment C, Section D(5) – Ability to Certify Housing Quality Standards

Attachment C, Section D(2)(c) – Rent Policies and Term Limits

**Statutory objective:**  
Reduce cost and achieve greater cost effectiveness in Federal expenditures

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	Prior to implementation, \$17,750	FY2018: \$0	\$0
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	Prior to implementation, 370 hours	FY2018: 0 hours	0 hours
Decrease in error rate of task execution (Standard Metric: CE#3)			
Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity.			
Average error rate in completing a task	FY2015: 0%	FY2018: Less than 5%	Less than 3%

**MTW Flexibility:**

Home Forward uses MTW authority to set rent reasonableness and inspect units we own, in place of contracting with a third party to do so. This results in cost savings for the agency.

## 09 MEASURES TO IMPROVE THE RATE OF VOUCHER HOLDERS WHO SUCCESSFULLY LEASE-UP

Approved FY2010, Implemented FY2010

Since 2010, Home Forward has implemented a variety of measures to improve landlord acceptance of Housing Choice Vouchers in our community and improve the ability of voucher holders to successfully lease up. Based on much of Home Forward's work, the Oregon State Legislature passed HB2639 in July 2014. The legislation prohibits landlords from refusing rental applications of voucher holders only because they have a voucher and offers landlords access to a state-managed Landlord Guarantee Fund if a voucher holder vacates a unit and leaves financial damages, such as property damage, unpaid rent, or fees.

In addition, Home Forward has initiatives focused on improving landlord participation and the leasing success of voucher holders:

- Vacancy Loss Payment – We provide vacancy loss payment to owners through the end of the month after the move-out month when vacancies are unforeseen or unexpected (such as a death or an unannounced move-out) and the owners have not received proper notice of the intent to vacate.
- Landlord Incentive Payment – Since July 2014, the Landlord Incentive Payment focuses on new landlords. Home Forward makes a one-time payment of \$200 to new landlords, defined as those who have not worked in partnership with us for the past two years. At the time of receiving payment, landlords are also given the opportunity to complete a survey to provide feedback on their experience and Home Forward's lease-up process.
- Tenant Education Class – Since May 2016, Home Forward contracts with the Community Alliance of Tenants (CAT) to teach a tenant education class to voucher holders. Class graduates have access to up to \$200 to help with a security deposit in their housing search.

Despite these initiatives, leasing success rates have fallen as a result of an extremely tight rental market, rapidly rising rents and an overall lack of affordable units. This is a statewide problem and Home Forward's Director of the Housing Choice Voucher program now sits on the state's Housing Choice Advisory Committee to discuss participant and landlord challenges across the state since the new law became effective in July 2014. Even with the above measures in place and the new legislation requiring landlords to accept Housing Choice Vouchers, leasing success rates have fallen below our 2009 baseline. In an attempt to keep pace with the market and ensure neighborhood choice for voucher holders, Home Forward increased payment standards in February and April 2016.

### **MTW authorization:**

Attachment C, Section B(1) – Single Fund Budget with Full Flexibility

Attachment C, Section D(1)(d) – Operational Policies and Procedures

Attachment C, Section D(3)(b) – Eligibility of Participants

Attachment D, Section D(1) – Establishment of a Local Section 8 / Housing Choice Voucher Program

### **Statutory objective:**

Increase housing choice for low-income families

In addition to the initiatives listed above, Home Forward began two new programs in FY2017, using single-fund flexibility, to help voucher holders lease up:

**Security and Success Loan Program** – This is a partnership between Home Forward and Innovative Changes, a non-profit community-based lender, to offer low-interest loans for moving costs to voucher holders with a household income of at least 30% of the Area Median Income (AMI). With a qualifying income, a voucher holder can borrow up to \$1,200 to help with deposits, fees, and other moving costs. The program offers affordable monthly payments, extra incentives for financial education, and the opportunity for a household to build a positive credit history.

**Housing Search Advocates** – This program is a partnership between Home Forward and two community partners, Human Solutions, Inc. and Transition Projects, Inc., who work with people experiencing low-incomes and homelessness. Three Housing Search Advocate positions have been funded at the organizations to help voucher holders lease up. If a voucher holder has not leased up within 90 days of receiving their voucher or have been identified by HCV staff as experiencing high barriers, they are referred to the Housing Search Advocates for additional support in their housing search.

We have continued with a variety of policy changes (which do not require MTW flexibility) to make the voucher program more appealing to landlords since the passage of HB2639. These include:

Allowing flexible lease terms based on an individual landlord's standard practice (including month-to-month)

Accepting electronic Requests for Tenancy Approval from landlords to speed the process

Posting tools for landlords on our website so landlords can assess whether their unit is likely to pass rent reasonable and affordability tests

In addition to the initiatives and new changes above, we continue to support voucher holders with an improved program orientation, with an increased focus on housing search, and utilizing the higher payment standards in opportunity neighborhoods in hopes of helping voucher holders be better prepared for their housing search.

**Changes or modifications:** We are not anticipating any changes to this activity. We will continue to evaluate both the lease-up rate and rental market data to determine if the current payment standards remain adequate or adjustments need to be made.

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Households assisted by services that increase housing choice (Standard Metric: HC#7)			
Number of households receiving services aimed at increasing housing choice	Before implementation, 0 households	FY2018: 180 households	At least 180 households per year will benefit from the Landlord Incentive Fee

**Additional Metrics:**

Improve voucher success rate			
Issued voucher success rate	FY2009: 74%	FY2018: 85%	FY2018: 85%
Decrease in lease-up time			
Average number of days for a voucher holder to lease up	Before implementation, 51 days	FY2018: 50 days	FY2018: less than 50 days

**MTW Flexibility:**

Home Forward has made changes to operational policies and procedures and funds these activities through our single-fund budget flexibility. This activity works to increase landlord participation in the program, and therefore, increase housing choice for low-income households.

## 10 LOCAL PROJECT-BASED VOUCHER PROGRAM

Approved FY2012, Implemented FY2012

Home Forward has created a project-based voucher (PBV) program tailored to meet the needs of the local community. We currently administer over 2,000 PBVs in the community via more than 74 separate contracts. The program continues to represent our focus on coordinating with jurisdictional partners and enhancing the supply of permanent supportive housing for households with barriers to housing.

In FY2015, Home Forward changed the operating subsidy at four of our high-rise buildings from public housing to project-based Section 8 funding, as part of our preservation strategy to renovate ten buildings. These four buildings accounted for 654 units, and serve seniors and persons with disabilities. The flexibility to place project-based vouchers at these buildings, as well as in other buildings through service provider and jurisdictional partnerships, ensures that affordable housing remains available to some of the most vulnerable households in our community.

The objective of the project-based voucher program is to provide housing certainty for low-income, high-barrier households who would be unlikely to succeed with a tenant-based voucher. With that in mind, we are focusing project-based vouchers on buildings with on-site services, ideally in opportunity areas, offering tenants affordable rents and access to community resources. Many of the original project-based voucher contracts have expired over the past year, and Home Forward has made it our policy to offer renewals only to owners who have agreed to set waiting list preferences for one or more vulnerable populations, and to make services available to those households. This will result in all project-based voucher buildings offering affordable housing with services to those most in need as contracts are renewed.

In the 2017 fiscal year, Home Forward received approval from their Board of Commissioners to set aside 500 vouchers from the Housing Choice Voucher pool to be assigned as Project Based Vouchers over the course of three to five years. Home Forward used two methods by which to assign these vouchers. First we issued our own Request for Proposals (RFP) in the winter of 2015 and allocated over 200 vouchers in the initial Request for Proposals. Awards were made to 12 individual projects across Multnomah County. Secondly, we committed another 100 vouchers in the Fall 2015

### **MTW authorization:**

Attachment C, Section D(7) –  
Establishment of an Agency MTW  
Section 8 Project-Based Program

Attachment C, Section D(4) – Waiting List  
Policies

Attachment C, Section D(2) – Rent  
Policies and Term Limits

Attachment C, Section D(1)(e) –  
Operational Policies and Procedures

### **Statutory objective:**

Increase housing choice for low-income  
families

Reduce cost and achieve greater cost  
effectiveness in Federal expenditures

Portland Housing Bureau Notice of Funding Availability (NOFA). Through this process four individual projects were awarded the 100 vouchers. All in areas of high opportunity and low poverty census tracts.

In our 2018 fiscal year we have 130 vouchers yet to be assigned. Home Forward will continue on the current path as noted above and outlined in the Section 8 Administrative Plan to make the remaining awards until we exhaust the 500 voucher commitment made by the board of commissioners.

Home Forward has modified owner proposal selection procedures for PBV units in order to increase Permanent Supportive Housing in our community by awarding PBV units via a local competitive process in collaboration with the City of Portland and Multnomah County. This local process includes issuing a Notice of Funding Availability and accepting proposals from housing developers and owners across the County. This effort ensures that PBVs are aligned with capital and services funding made available from our jurisdictional partners. The local competitive process may be waived and PBVs may be awarded based on a formal approval and resolution process by Home Forward’s Board of Commissioners when the property is owned directly or indirectly by Home Forward, subject to HUD’s requirements regarding subsidy layering. The owned units would not be subject to any required assessments for voluntary conversion.

**Changes or modifications:** We are not anticipating any changes to this activity.

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Additional units of housing made available (Standard Metric: HC#1)			
Number of new housing units made available for households at or below 80% AMI	FY2011: 1,100 units	FY2018: 1,400 units made available	Maintain at least 1,100 units that have been made available through this activity
Units of housing preserved (Standard Metric: HC#2)			
Number of units preserved for households at or below 80% AMI that would otherwise not be available	Prior to implementation: 0 units	FY2018: 654 units preserved	654 units will be preserved through conversion from public housing to project-based vouchers
Decrease in wait list time (Standard Metric: HC#3)			
Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity			
Average applicant time on wait list in months	FY2014: 15 months	FY2018: 27 months	27 months

Displacement prevention (Standard Metric: HC#4)			
Note: Because Home Forward does not have a pre-implementation baseline for this metric, we are not able to show the historical impact of this activity			
Number of households at or below 80% AMI that would lose assistance or need to move	FY2015: 904	FY2018: 1,032	Over 800 additional project-based voucher units are available through our ability to exceed the 25% building cap
Increase in Resident Mobility (Standard Metric: HC#5)			
Number of households able to move to a better unit and/or neighborhood of opportunity (defined as low poverty census tracts where poverty is below 18.5%)	FY2011: 93 households	FY2018: 500 households	500 households
Agency Cost Savings (Standard Metric: CE#1)			
Total cost of task in dollars	Prior to implementation: \$30,720	FY2018: \$43,006	\$43,006
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	Prior to implementation, 917 hours	FY2018: 1,164 hours	Less than 1,225 hours
Decrease in error rate of task execution (Standard Metric: CE#3)			
Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity.			
Average error rate in completing task	FY2015: 2%	FY2018: Less than 5%	Less than 5%
Increase in tenant share of rent (Standard Metric: CE#5)			
Note: Because Home Forward does not have a pre-implementation baseline, we are not able to show the historical impact of this activity			
Total annual tenant share of rent	FY2014: \$3,570,859	FY2018: \$8,007,651	Annual tenant rent share of \$8,007,651

**MTW Flexibility:**

The PBV program increases housing choice and affirmatively furthers fair housing by preserving existing affordable housing and focusing on the needs of populations that tend to be less successful in the tenant-based program, including participants with disabilities, extremely low incomes, or backgrounds that may create high barriers to housing. Most of the PBV buildings offer services for specific populations, which help households not only to obtain suitable housing, but also to access additional services that give the household stability in the community. Below is a list of the ways Home Forward utilizes MTW authority for the local PBV program:

- Home Forward exceeds the traditional 25% limit of PBVs in a single building, and allows project-based vouchers to be awarded to more than 25% of units in a given complex.
- Home Forward has modified waitlist policies to allow each PBV building to maintain its own site-based waiting list with its own preferences. It would not be practical or cost effective for Home Forward to manage so many separate PBV waiting lists with separate preferences. Multiple waitlists also ensure that there are almost always open waitlists at any point in time.
- Home Forward does not provide a preference on the tenant-based waiting list for PBV residents, and requires PBV residents to apply for and remain on the tenant-based waitlist in order to transfer to a tenant-based voucher unit.
- Home Forward modifies screening and eligibility requirements to differ from the traditional criteria at certain PBV properties which offer supportive services, therefore increasing housing choice for participants who might otherwise be ineligible for Section 8 housing. Home Forward determines an applicant's eligibility for a specific PBV property based on the capacity of the service provider who owns or contracts to manage the property.
- Home Forward has modified owner proposal selection procedures for PBV units in order to increase Permanent Supportive Housing in our community by awarding PBV units via a local competitive process in collaboration with the City of Portland and Multnomah County. This local process includes issuing a Notice of Funding Availability and accepting proposals from housing developers and owners across the County. This effort ensures that PBVs are aligned with capital and services funding made available from our jurisdictional partners.
- The local competitive process may be waived and PBVs may be awarded based on a formal approval and resolution process by Home Forward's Board of Commissioners when the property is owned directly or indirectly by Home Forward, subject to HUD's requirements regarding subsidy layering. The owned units would not be subject to any required assessments for voluntary conversion.
- Home Forward has adopted the local city and county site selection standards for PBV units in order to ensure alignment with jurisdictional partners in regards to site selection for low-income housing aimed at ending homelessness. Site selection standards are designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations of 20% or less.

- Home Forward has modified subsidy standards regarding under- and over-housing in order to ensure full utilization of PBV units. Subsidy standards are the same for PBVs as those used for tenant-based vouchers, but exceptions are granted when there are no appropriately sized households on the waiting list to fill a vacant unit.
- Home Forward has modified lease terms, renewal options, and termination policies to limit owners' ability to terminate tenancy without cause, maximizing housing choice for the families in those units. After the initial term, PBV leases convert to a month-to-month agreement unless owners and tenants agree to a longer term, and owners may not refuse to renew leases without cause. Owners of PBV units may not terminate tenancy without cause, except as follows:
  - The owner of a PBV unit may terminate tenancy for a family if Home Forward terminates the family's assistance for any reason in order to ensure that another low-income applicant can be served. However, instead of terminating tenancy, the owner may request Home Forward's approval to amend the PBV contract to remove a unit occupied by a zero subsidy family or amend the PBV contract to substitute a different unit with the same number of bedrooms in the same building.
- Home Forward modified the way contract rents are determined for PBV units by limiting PBV contract rents to a maximum of the payment standard less any applicable tenant paid utility allowance, ensuring that PBV units are affordable even to zero-income households.
- Home Forward adapted the timing of applying payment standard adjustments for PBV participants. Any increase in payment standards to the PBV units is applied on the next anniversary date of the PBV Housing Assistance Payments Contract, following the effective date of the increase. Any decrease in payment standards to the unit is applied beginning on the second anniversary date of the PBV Housing Assistance Payments Contract following the effective date of the decrease. Home Forward also applies any changes to the utility allowances at the same time as the payment standard adjustments.
- Home Forward uses an alternate rent setting policy that allows the Rent Assistance Director, with Board approval, to set exception payment standards that are greater than 110% (up to a maximum of 150%) of Fair Market Rents for service-enriched buildings without requesting HUD approval. The payment standard granted applies to any unit under the project-based voucher contract serving a highly vulnerable population with intensive services. Data is required of the owner to verify the value of the services being provided, and this cost will not be included when conducting rent reasonableness tests.
- Home Forward allows Home Forward staff to conduct inspections, set rents and determine rent reasonableness for Home Forward-owned units that utilize PBVs. When Home Forward both owns and manages the unit, it hires a third party to conduct quality control testing of inspections and rent reasonableness determinations for a sample of these units. This activity is also described under Activity 08: Inspection and Rent Reasonableness at Home Forward-Owned Units.

- Home Forward has eliminated the cap limiting project-basing to up to 20% of the amount of budget authority allocated to the agency by HUD in the voucher program.

11 ALIGN UTILITY ALLOWANCE ADJUSTMENT PROCEDURES  
Approved FY2011, Implemented FY2011

In our FY2011 MTW Plan, Home Forward received approval to align the public housing process for calculating and implementing utility allowance adjustments with that of Section 8. Previously, the public housing utility allowance process required Home Forward to conduct engineering surveys to determine energy consumption, which was cumbersome and costly. Additionally, public housing protocol required that a re-certification be completed for each resident when there were adjustments to the utility allowance.

Aligning the utility allowance adjustment process with that of Section 8 allows public housing to adopt the methodology of using HUD’s standard calculation, which is based on the type of utility and type of building. As in the Section 8 program, public housing staff will review the utility allowance adjustments annually, with the adjustment going into effect at the resident’s next regular review.

**MTW authorization:**  
Attachment C, Section C(1 1) – Rent Policies and Term Limits

**Statutory objective:**  
Reduce cost and achieve greater cost effectiveness in Federal expenditures.

**Changes or modifications:** We are not anticipating any changes to this activity.

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	Before implementation, \$8,000 per year	FY2018: \$0	\$0 to complete survey
Staff time savings (Standard Metric: CE#2)			
Total time to complete task	Before implementation, approximately 393 hours	FY2018: 0 hours	0 hours

**MTW Flexibility:**

The standard public housing utility allowance process requires engineering surveys to determine energy consumption, and that a re-certification be completed for each resident when there is a utility allowance adjustment. Our MTW flexibility allows us to align the public housing process with that of Section 8, resulting in agency cost and staff time savings.

### 13 BROADEN RANGE OF APPROVED PAYMENT STANDARDS

Approved FY2015, Implemented FY2015, Amended FY2017

Regulations require that payment standards are set between 90% and 110% of Fair Market Rents (FMR), as defined by HUD for a Housing Authority's jurisdiction. Home Forward serves all of Multnomah County, a large geographic area with rents that differ throughout several submarkets, i.e. downtown Portland and East County, which is more rural. When the rental market conditions tighten, it is not uncommon for 110% of Fair Market Rent to fall short of what is needed to rent a quality unit in large, and often higher opportunity, areas of Multnomah County. In addition, payment standards that are too high in particular neighborhoods can create concentrations of poverty.

In order to ensure that payment standards are sufficient to allow Housing Choice Voucher participants reasonable choice in neighborhoods, Home Forward has used MTW authority to broaden its "base range" for payment standards to between 80% and 160% of the Fair Market Rents without prior HUD approval.

(In FY2015, Home Forward received authorization to set payment standards between 80% and 120% of Fair Market Rents. In FY2017, Home Forward received authorization to broaden that range between 80% and 160% of Fair Market Rents.)

Home Forward uses the following parameters to establish payment standards:

- Payment standards are broken down by nine separate neighborhoods as defined by ZIP codes. Each of these neighborhood payment standards is broken down by bedroom size.
- Payment standards are set at the market rate.
- Because data shows that market rents are significantly different for three-bedroom apartments and three-bedroom single-family homes and duplexes, Home Forward has established separate payment standards for the two housing types with three bedrooms.

In response to a FMR study commissioned by the local metro-area housing authorities, on February 3, 2016, HUD adopted revised FMRs for the Portland-Vancouver-Hillsboro, OR-WA, HUD Metropolitan Statistical Area (MSA). In March 2016, utilizing these new and substantially increased FMRs together with our existing authority, at the time, to set payment standards up to 120% of FMR. Home Forward's Board of Commissioners adopted new payment standards to be effective April 1, 2016. These payment standards are set at up to 118% of FMR in some neighborhoods to reflect actual market costs in order to give participants a greater chance to lease up in low poverty, high-opportunity neighborhoods.

With these new payment standards, from April 1, 2016 – August 31, 2016, approximately 5,244 families (82% of Housing Choice Voucher participants) have units that benefitted from the implementation of the payment standards set beyond the basic range of 90-110% FMR. Even with the increased FMRs, continued rent increases have proven payment standards up to 120% are insufficient in many neighborhoods we serve, effectively barring low-

**MTW authorization:**

Attachment C, Section D(2)(a) – Rent Policies and Term Limits

**Statutory objective:**

Increase housing choice for low-income families

income families from accessing housing in these areas without paying high market rents in excess of the payment standards. Despite setting payment standards at 118% of FMR, our April 1<sup>st</sup>, 2016 payment standards for studio apartments are below 90% of actual market rate in two of our nine payment standard areas, the payment standards for 1-bedroom apartments are below 90% of market in three of the nine payment standard areas, and the payment standards for 2-bedroom apartments are below 90% of market in four of the nine payment standard areas. The following table illustrates the shortfall in studios, one-bedrooms and two-bedrooms throughout the county:

Submarket	STUDIOS		1 BEDROOM		2 BEDROOM	
	Avg shelter cost	Shelter cost as FMR%	Avg shelter cost	Shelter cost as FMR%	Avg shelter cost	Shelter cost as FMR%
<b>Downtown</b>	\$ 1,090	115%	\$ 1,331	126%	\$ 1,465	118%
<b>Downtown/NW</b>	\$ 760	80%	\$ 986	94%	\$ 1,122	90%
<b>Gresham/Fairview/Troutdale</b>	\$ 1,152	122%	\$ 1,209	115%	\$ 1,416	114%
<b>Inner &amp; Central NE</b>	\$ 1,200	127%	\$ 1,247	118%	\$ 1,321	106%
<b>Inner &amp; Central SE</b>	\$ 1,133	120%	\$ 1,092	104%	\$ 1,239	100%
<b>N Portland/St. Johns</b>	\$ 1,308	138%	\$ 1,559	148%	\$ 1,381	111%
<b>Outer NE</b>	\$ 794	84%	\$ 981	93%	\$ 1,173	94%
<b>Outer SE</b>	\$ 880	93%	\$ 1,002	95%	\$ 1,127	91%
<b>SW Portland</b>	\$ 1,045	110%	\$ 1,262	120%	\$ 1,217	98%

We will always need to balance the opportunity created with higher payment standards with the increased per family costs associated with higher payment standards. Higher payment standards can put limits on our ability to respond to the overwhelming need in our community, but given the nature of the rental market in Multnomah County, the flexibility to set payment standards up to 160% of FMR may be necessary to create reasonable choice for participant families, particularly in low-poverty, high-opportunity areas. We anticipate revising payment standards in FY2017, and depending on updated market survey data, utilization levels, and lease-up success, we may implement payment standards above 120% in some areas. Home Forward has also been authorized to approve Exception Payment Standards up to 160% of Fair Market Rents in low-poverty areas or as a reasonable accommodation for a family that includes a person with disabilities.

- Home Forward participants are on biennial and triennial recertification schedules, per Activity 01 Rent Reform. Because of this, there is sometimes a delay of several months or even years before the increased payment standard is applied to a participant's rent calculation. In the meantime, those participants may be experiencing a larger shelter burden as their landlords increase rent without the accompanying increase in payment standards. To address this delay, Home Forward has been authorized to apply updated payment standards at a participant's interim review.

**Changes or Modifications:** We are not anticipating any changes to this activity.

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Increase in resident mobility (Standard Metric: HC#5)			
Number of households living in better neighborhoods (defined as low poverty census tracts where poverty is below 18.5%)	FY2013: 1,896 (30%) households lived in better neighborhoods	FY2018: 2,000 households	FY2018: at least 2,150households
Agency cost savings (Standard Metric: CE#1) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Home Forward does not save costs through this activity, but we have included it at HUD's request.			
Total cost of task	FY2014: \$48,597,556	FY2018: \$60,000,000	FY2018: \$78,000,000

**Additional Metrics**

Average Housing Assistance Payment expense			
Average annual HAP expense by household	FY2014: \$6,690	FY2018: \$7,340	FY2018: \$7,824

Data will be collected from YARDI, Home Forward's database, which tracks the census tract and Payment Standard used for each household.

**MTW Flexibility:**

Home Forward uses our MTW authority to expand the range for which Home Forward may set payment standards across the various submarkets of Multnomah County to between 80% and 160% of HUD-established Fair Market Rents, and to allow for exception payment standards up to 160% of Fair Market Rents, without HUD approval. This ensures that payment standards are sufficient to allow all families, including those that need a reasonable accommodation, to choose to rent units in all nine of the defined areas in Multnomah County (so long as Housing Choice Voucher funding

is sufficient to permit this). Home Forward may also choose to reduce payment standards in areas with lower market rents. Home Forward may apply updated payment standards at a participant's interim review.

#### 14 PROGRAM BASED ASSISTANCE

Approved FY2015, Implemented FY2015

The need for rental assistance in Multnomah County far outstrips the supply. When Home Forward opened the Section 8 waiting list in 2016 for the first time in 4 years, over 16,000 households applied for 3,000 waiting list slots.

In an attempt to increase the number of households served over a given period of time, Home Forward has designed Program Based Assistance. This local, non-traditional rent assistance program offers time-limited rent assistance, paired with services, to help families access and/or retain stable housing. While the Housing Choice Voucher and public housing programs provide permanent subsidies in order to ensure long-term affordability for low-income families, the focus of Program Based Assistance is helping families achieve stability. These households will likely remain rent-burdened, but with services available to help families address other challenges in their lives, many will be able to avoid homelessness and remain permanently housed.

To administer Program Based Assistance, Home Forward sets aside a pool of flexible rent assistance funds to serve targeted populations, in partnership with one or more local service providers who ensure that the families have access to the supportive services or resources they need to be stable and successful. Target populations for Program Based Assistance are families for whom: 1) success on the Section 8 Housing Choice Voucher program would be unlikely; 2) the delay in accessing rent assistance due to the Section 8 waitlist would most likely have devastating results (recidivism, relapse, death, homelessness, etc.); or 3) the need for rental subsidy is short term while the client is receiving the support needed to stabilize in permanent housing. Examples of target populations include families who are homeless or at risk of homelessness, families with children attending Alder Elementary School (which has one of the highest mobility rates in the County and was adopted by the I Have a Dream Foundation in order to improve outcomes), former foster youth, survivors of domestic violence, and families with an adult who has recently been released from prison.

Program Based Assistance partners work with Home Forward to set program policies that are specific to the target population they are serving. Home Forward ensures that policies are clear, equitably managed, and in compliance with Fair Housing laws. All programs have common elements which include:

*Uses of Funds:* Rental Assistance funds may be used for rent assistance, rent arrears with a current landlord, move-in fees and deposits, utility assistance and arrears, motel vouchers if housing is identified but not immediately available, and documented debt to a past landlord (other than a public housing authority).

*Eligibility:* Eligibility for Program Based Assistance is as low barrier as possible in order to provide housing access for hard-to-serve households. The only limitations on eligibility are: 1) the household must include at least one person who is a U.S. citizen, U.S. national, or noncitizen with eligible immigration status; 2) the household may not include any member who is subject to lifetime registration as a sex offender or has been convicted of production/manufacture of methamphetamine on premises of federally assisted housing; 3) no one in the household may owe Home Forward money; and 4) annual gross income cannot exceed 50% of area median income.

*Subsidy Determination Method:* Each partner is required to write clear policies and procedures for how subsidy amount and duration will be determined. These policies must be applied to all participants in that partner's program.

*Service Requirements:* Home Forward makes these funds available to target populations in partnership with one or more partners who are experts in providing the supports families may need to remain stably housed and move towards a stable, permanent housing situation. Therefore, partner agencies are required to make services available to all families accessing Program Based Assistance. Partner agencies will also have the discretion to discontinue rental assistance to households who violate their program policies or fail to engage in services after repeated attempts at engagement.

**Changes or Modifications:**

We are not anticipating any changes to this activity.

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Additional Units of Housing Made Available (Standard Metric: HC#1)			
Number of new housing units made available for households at or below 80% AMI	Before implementation, 0 units	FY2018: 5 units	5 additional units made available through the New Doors project for former foster youth
Increase in Resident Mobility (Standard Metric: HC #5)			
Number of households able to move to a better unit and/or neighborhood of opportunity	Before implementation, 0 households	FY2018: 149 unduplicated households	110 formerly homeless households receive placement services annually
Households Assisted by Services that Increase Housing Choice (Standard Metric: HC #7)			
Number of households receiving services aimed to increase housing choice	Before implementation, 0 households	FY2018: 809 unduplicated households	300 households receive services annually through Program Based Assistance

Home Forward tracks this information through a combination of our YARDI database system, reporting by partner agencies, and the community's Homeless Management Information System (HMIS) software.

**MTW Flexibility:**

Home Forward uses MTW flexibility to blend program funds into a single budget used to fund Program Based Assistance. This allows Home Forward to administer a form of non-traditional rent assistance that can target households in crisis and help them reach or maintain housing stability.

## 15 TENANT-BASED VOUCHER SET ASIDE POLICIES

Home Forward operates or participates in a number of programs that have been designed to align housing with supportive services in order to ensure success for participating families. These include local non-traditional rent assistance programs, our local project based voucher programs, and the Veterans Affairs Supportive Housing (VASH) program. In all cases, jurisdictional or community partners provide supports for families who access the housing, with target populations including families exiting homelessness, former foster youth, seniors, and people with disabilities.

**MTW authorization:**

Attachment C, Section D(4) –  
Waiting List Policies

**Statutory objective:**

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Home Forward has found that leveraging our housing resources with services from partners often results in better housing stability and success for families with barriers to succeeding with a voucher alone. In addition to the above programs, we have also established a series of limited preferences for tenant-based vouchers. Through these limited preferences, specific community partners refer target populations to Home Forward for housing as they provide services. Among the set aside programs we've instituted are:

- Home Forward sets aside up to 200 vouchers for families currently served by Multnomah County's Homeless Family System of Care.
- We also set aside up to 50 vouchers for families that include a veteran experiencing homelessness, who are ineligible for HUD-VASH vouchers. These families are referred by and received services from Transition Projects, Inc.

HUD regulations for tenant-based vouchers require a housing authority to select all participants from a waiting list. In order to adhere to regulations, current families served by the two set aside programs are chosen and referred to Home Forward by the community partner, added to the tenant based voucher waiting list, then immediately pulled from the waiting list to be served with the vouchers that are dedicated to the program. This process is inefficient, time-consuming and cumbersome.

Home Forward is proposing to instead model the referral and selection procedures after the existing VASH program. As with VASH, Home Forward will accept referrals from the specified partners and award those households the dedicated vouchers. Written documentation of the referral will be maintained in the tenant file by Home Forward, but Home Forward will not add these households to the waiting list to be immediately selected. This flexibility will increase efficiency and may reduce the number of days a family has to wait between referral and issuance of the voucher.

For each limited preference program, Home Forward will execute a Memorandum of Understanding with the partner specifying:

- Number of vouchers set aside for the preference;
- Eligibility criteria for the preference;
- Criteria for determining how families will be selected and referred to Home Forward by the partner(s);
- Type and duration of services the partner(s) will make available to the household; and
- Understanding that all referrals must be in writing and include a certification from the partner(s) that the family was selected and referred to Home Forward in accordance with the criteria outlined in the Memorandum of Understanding.

Home Forward will audit partner agencies to ensure that they adhere to selection criteria specified in the Memorandum of Understanding.

During FY2018, we plan to enter into Memorandums of Understanding with up to eight community partners and set aside up to 250 tenant-based vouchers to serve selected target populations. Target populations will include those vulnerable to housing instability and/or those with an ongoing need for supportive services once housed. The two current set aside programs Home Forward is operating will be completed by the start of FY2018. However, should they be renewed, Home Forward would shift to the referral system (with no waiting list) for these set aside programs as well.

**Impact on Statutory Objective(s)**

Since households are referred for set aside vouchers by community partners, it is inefficient and duplicative for Home Forward to maintain a waiting list of the families that partners have selected, only to immediately pull those families off the list. Accepting referrals from the partners of the set aside program, who have selected families based on the criteria outlined in the Memorandum of Understanding, will create efficiencies.

**Activity Metrics:**

Metric	Baseline	Benchmark	Final Projected Outcome
Agency cost savings (Standard Metric: CE#1)			
Total cost of task	FY2016: \$875	FY2018: \$0	\$0
Staff time savings (Standard Metric: CE#2)			
Total time to complete the task	FY2016: 29.5 hours	FY2018: 0 hours	0 hours
Decrease in wait list time (Standard Metric: HC#3) Note: This is a standard reporting metric used by HUD to measure impacts across agencies on a national level. Because households are immediately pulled from the waiting list, this will have no impact on this metric; but we have included it at HUD's request.			
Average applicant time on wait list in months	FY2016: 0 months	FY2018: 0 months	0 months

Home Forward will track this information through our YARDI database system.

**MTW Flexibility**

Home Forward is using our MTW flexibility to waive requirements that families served through set aside tenant-based vouchers be selected from a waitlist, only to be immediately pulled from the list. Instead families will be referred to Home Forward by the specified community partners, who will have selected households based on limited preferences and criteria of the Memorandum of Understanding.

## Not Yet Implemented Activities

None

## Closed Out Activities

### 12 ALTERNATIVE INITIAL HOUSING ASSISTANCE PAYMENT POLICY

Approved FY2015, Closed Out FY2017

Reason for Close Out:

Home Forward made a decision to close the not yet implemented Alternative Initial Housing Assistance Payment policy activity. Home Forward formed a workgroup to create procedures and documents to discuss a pilot of the Alternative Initial Housing Assistance Payment policy. The workgroup consisted of staff knowledgeable in Housing Quality Standards inspections and compliance, and those responsible for supervising the staff who would be administering the program.

The workgroup met with an attorney to discuss potential issues and impediments to implementing the process. One potential issue discussed was how to legally require landlords to relinquish their right to collect a lease break fee in the event they enter into a lease agreement with a tenant who wants to dissolve the lease because the unit did not pass HQS inspection or if the Request for Tenancy Approval is denied. The work group also discussed the complexities of having staff learn and administer two different Housing Assistance Payment policies. Lastly, staff struggled to come up with ways to effectively educate tenants and landlords eligible to participate in the pilot process. These reasons resulted in the decision to close the Alternative Initial Housing Assistance Payment Policy activity.

Final Outcome and Lessons Learned:

The intent of the Alternative Initial Housing Assistance Payment policy was to improve landlord relationships and increase the lease up process time. However, the workgroup was concerned that this policy may be an administrative burden and may cause unintentional delays. Landlords have not reported concerns about Home Forward's inspection time; Home Forward is generally able to schedule and conduct initial inspections shortly after receiving the Request for Tenancy Approval.

Home Forward has started to implement other processes to increase housing choice for low income families. We have partner with Innovative Changes to establish a security success fund to offer low interest loans to help families above 30% AMI pay for moving costs. We partnered with agencies to create a Housing Search Advocate program to assist families with housing search and help pay for the

costs associated with moving. The Housing Search Advocates also work directly with landlords to educate and assist landlord to navigate Home Forward’s processes such as reviewing the Request for Tenancy Approval and Inspection to expedite the process for participants and landlords.

**MTW Flexibility:**

This activity allows Home Forward to conduct initial inspections up to 15 days after the effective date of a HAP contract, and make payments effective as of that contract date.

Metric	Baseline	Benchmark	Final Projected Outcome	Benchmark Achieved
Increase in resident mobility (Standard Metric: HC#5)				
Number of households living in better neighborhoods (defined as low poverty census tracts where poverty is below 18.5%)	FY2013: 1,896 (30%) households lived in better neighborhoods	FY2017: 2,000 households	At least 2,000 households (32%)	Never Implemented

**Additional Metrics:**

Improve voucher success rate				
Issued voucher success rate	FY2013: 81.5%	FY2017: 85%	85%	Never Implemented
Decrease in lease-up time				
Average number of days for an MTW voucher holder to lease up	FY2013: 51.6 days	FY2017: less than 50 days	Less than 50 days	Never Implemented

Name of Activity	Year Approved	Year Implemented	Year Closed Out	Reason for Close Out
Alternate Rent Calculation for Public Housing Units at Rockwood Station, Martha Washington, and Jeffrey	FY2011	FY2011	FY2012	This activity was discontinued on April 1, 2012 when our current Rent Reform activity was implemented and the units at those buildings shifted to the Rent Reform calculation.
Limits for Zero-Subsidy Participants	FY2010	FY2010	FY2012	This activity was discontinued on April 1, 2012 with the implementation of Rent Reform.
Limiting Portability in Higher Cost Areas	FY2013	Never implemented	--	Home Forward determined that the administrative costs to manage this activity would offset the proposed savings.
04 Bud Clark Commons	FY2010	FY2010	FY2014	Home Forward has determined that operations at Bud Clark Commons do not utilize MTW flexibility.
05 Biennial Inspections	FY2008	FY2008	FY2015	The FY2014 Appropriations Act allows all housing authorities to conduct inspections on a biennial basis. This activity no longer requires MTW flexibility.

# Sources and Uses of Funding

## Sources and Uses of MTW Funds

### Estimated Sources of MTW Funding for the Fiscal Year 4/1/17-12/31/18

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$ 3,605,000
70600	HUD PHA Operating Grants	82,210,000
70610	Capital Grants	1,763,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	52,000
71600	Gain or Loss on Sale of Capital Assets	(372,000)
71200+71300+71310+71400+71500	Other Income	3,091,000
<b>70000</b>	<b>Total Revenue</b>	<b>\$ 90,349,000</b>

### Estimated Uses of MTW Funding for the Fiscal Year 4/1/17-12/31/18

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$ 8,439,000
91300+91310+92000	Management Fee Expense	0
91810	Allocated Overhead	2,232,000
92500 (92100+92200+92300+92400)	Total Tenant Services	372,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	2,100,000
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	5,620,000
95000 (95100+95200+95300+95500)	Total Protective Services	50,000
96100 (96110+96120+96130+96140)	Total insurance Premiums	305,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	4,041,000
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	79,000
97100+97200	Total Extraordinary Maintenance	6,000
97300+97350	Housing Assistance Payments + HAP Portability-In	65,342,000
97400	Depreciation Expense	3,147,000
97500+97600+97700+97800	All Other Expenses	0
<b>90000</b>	<b>Total Expenses*</b>	<b>\$ 91,733,000</b>

\* Excluding Depreciation Expense (a non-cash category) and Capital Grants (non-operating revenue), MTW Sources equal MTW Uses.

Describe the Activities that Will Use Only MTW Single Fund Flexibility

### **Replacement Housing Factor Funds/Demolition or Disposition Transition Funding**

Home Forward's efforts to reposition its public housing portfolio can result in a formal disposition approval from HUD and then the sale of the asset. In these instances, Replacement Housing Factor (RHF) or Demolition or Disposition Transitional Funding (DDTF) funds are received by Home Forward as part of the Capital Fund Formula and used to create a new public housing unit. Home Forward utilizes MTW authority to use these RHF or DDTF funds within its single fund flexibility to create new public housing units in a mixed-finance project. In doing so, these funds provide a portion of the total development capital needed for a particular project. Given the development cash flow needs of any particular mixed-finance project, Home Forward may also use these funds to repay construction financing. This would be done without formally pledging the future RHF or DDTF funds to the lender as collateral.

### **MTW Initiative Funds**

Home Forward has created MTW Initiative Funds, comprised of MTW reserve funds in their entirety. This is a funding source to support initiatives that will advance the goals and objectives of MTW and Home Forward's Strategic Operations Plan. Some of these initiatives are aspects of our MTW Activities, described earlier in this Plan.

Listed below are initiatives that only use single-fund flexibility:

- Action for Prosperity: Action for Prosperity is a partnership between Home Forward, Worksystems, Inc., the Multnomah County Anti-Poverty system, and the State Department of Human Services. Each system leverages its resources by delivering core services and utilizing the other systems to provide wrap-around supports. With access to stable housing, the appropriate level of case management, and priority access to workforce services, we believe that a significant number of households will be able to develop the skills they need to gain employment within two years. Home Forward contributes rent assistance, in the form of Program Based Assistance, which is contracted to agencies in the Anti-Poverty system who use it to help stabilize families who are engaged in training or employment programming.
- Families Forward: Families Forward is the umbrella name for our strategic initiatives designed to help youth attain education success in order to alleviate or exit poverty, and to help adults make economic progress, with the ultimate goal of exiting poverty for those who are able.
  - For adults, the current priority is to create a single framework for all of the agency's Economic Opportunity efforts, integrating the following four strategies: collecting information about families through an Employment

and Training Interest Inventory; aligning existing self-sufficiency programs into a single program called GOALS, with site-based and non-site based components; facilitating the hiring of low-income (Section 3) residents and participants by Home Forward and contractors; and integrating Action for Prosperity (mentioned above) into Economic Opportunity work. Ultimately, the goals for this initiative include increases in resident/participant earned income, increases in residents'/participants' contribution to rent, and residents/participants reaching a living wage if they exit housing subsidy.

Youth Initiatives: Home Forward's youth and education work for the next fiscal year will largely focus on early childhood (children prenatally through age 8) in several key areas: improving school attendance, especially in the early grades; increasing our support of parents with children ages 0-5 to improve school readiness; and aligning our services with key educational and parent support partners to improve parent and child well-being and school readiness. These efforts will be coordinated with local sector partners and collective impact efforts focused on creating a more seamless early childhood system of support and addressing chronic school absence across Multnomah County.

- Aging at Home Strategies: Home Forward is developing and implementing initiatives to increase independence and a sense of community at our properties that serve seniors and people with disabilities. We have hired a Health & Support Services Coordinator to assist in the enhancement and development of partnerships and systems alignment with a variety of partners including Aging & Disability Services, Cedar Sinai Park, Care Oregon, Health Share and Family Care, clinics and educational bodies. In addition, we plan to continue administering the Congregate Housing Services Program at five properties and are evaluating expansion of this program and/or implementing certain aspects of this program at other properties.
- Staff Training: Home Forward's current strategic plan (2016-2020) recognizes that how our work is done matters to our community and staff. To strengthen our relationship with the people we serve and with each other, Home Forward continues to re-evaluate best practices and approaches to offer relevant information and training for staff. Training includes Trauma-Informed practice, a recognized model that recognizes the impact trauma can have on people and commits to not repeating traumatic experiences. The goal is to provide staff with knowledge and tools suitable for their position to recognizing symptoms of trauma and applying trauma informed awareness in engaging in the work and to support this by creating Trauma Informed policies and procedures that encourage healing and a sense of safety.
- Neighbor-to-Neighbor Grant Program: Home Forward has created a grant program for resident groups from our public or affordable housing communities. Resident groups submit applications for grant funds to improve their

community livability and reinforce community values. Past resident-led projects have included exercise classes, afterschool tutoring, an accessible community garden and the creation of a soccer field and youth sports team.

- Security Deposit Assistance: Home Forward uses single-fund flexibility to offer security deposit assistance to two populations: participants leasing up with Veterans Affairs Supportive Housing (VASH) vouchers, and former foster youth leasing up with Family Unification Program (FUP) vouchers. For homeless veterans, a lack of funds for security deposits is a serious barrier to successful use of VASH vouchers. Similarly, youth aging out of the foster care system often do not have the resources to pay for security deposits when trying to utilize FUP vouchers. Security deposit assistance is a key support to finding housing for veterans and youth. Home Forward's funds are to be used only when the service agencies working with these populations are not able to otherwise arrange for deposit assistance.
- Tenant Education Class and Deposit Assistance: During FY2016, Home Forward entered into a contract with a community-based tenant advocate organization, the Community Alliance of Tenants (CAT), to teach new and transferring Housing Choice Voucher holders about their rights and responsibilities as tenants. Upon completing the class, voucher holders are given one-time access to \$200 in deposit assistance for their housing search. This partnership grew out of concern that in the current competitive rental market, and with the recent changes in Oregon landlord/tenant law, voucher holders needed more education about how to be successful applicants and tenants.
- Inspection Related Moving Fund: As described in Activity 12, Home Forward has created a moving assistance fund to assist households in making deposit payments in the unlikely event that a landlord fails to make necessary repairs to their unit after the initial inspection. (Not yet implemented; see Activity 12)
- Inter-jurisdictional Transfer Program for Survivors of Domestic Violence: In collaboration with other MTW-authorized housing authorities and the local domestic violence service system, Home Forward has implemented an inter-jurisdictional transfer program to assist participants who are survivors of domestic violence. The program ensures continued access to stable and safe housing when it is deemed necessary that the household move to another jurisdiction to avoid violence that is likely to become lethal or near-lethal. A local domestic violence service provider has assigned two full-time advocates to work on-site with Home Forward participants and residents. The advocates can recommend voucher participants to this transfer program and provide advocacy and assistance with relocation to the new jurisdiction. Clients are connected with a local domestic violence agency in the new jurisdiction for support after their transfer. Home Forward allocates up to \$2,000 per household for relocation costs, for up to five households

each year. In addition, Home Forward intends to absorb the vouchers of up to five families referred by partnering MTW agencies. To date, this option has not been utilized.

- Section 8 Success Fund: Home Forward is testing two pilot programs in an effort to increase utilization rates and decrease the number of days to lease up for Housing Choice Voucher (HCV) households. The Success Fund is jointly funded by the City of Portland and Home Forward MTW Initiative Funds.
  - Security and Success Loan: HCV households of 30% AMI or more are offered low-interest loans with affordable re-payment terms in order to assist with moving related costs, such as security deposits. Home Forward has partnered with Local Community Development Financial Institution; Innovative Changes is serve as the lender. The loan is also an opportunity for credit building and financial education.
  - Housing Search Advocates: Home Forward contracts with three Housing Search Advocates to provide housing search and placement assistance to HCV households. The Advocates are employed by two non-profits who specialize in housing, Transition Projects Inc. and Human Solutions. Along with case management supports, the Advocates can also provide a limited amount of financial assistance to help reduce barriers to housing such as security deposits, application fees, and transportation for the housing search.
  
- Expungement Partnership: Home Forward is collaborating with Metropolitan Public Defender (MPD), a non-profit legal firm, to provide legal services to assist Home Forward residents, participants, and waitlist households with criminal record expungements along with consultation on any outstanding obligations to the court system. By reducing a barrier to housing and employment that is associated with a criminal background, Home Forward will help residents gain greater housing choice options in our community and ability for increased opportunity for work focused households to obtain employment. Home Forward also plans to see a decrease in administrative costs related to screening denials as an outcome of this project. Home Forward is using MTW Initiative Funds to support this program.
  
- Affordable Housing Opportunities: With incredibly low vacancy rates and a lack of affordable housing, Home Forward is dedicated to preserving and increasing the number of housing units in our community. Home Forward will use MTW Initiative Funds to leverage additional funding for the preservation of existing affordable housing and development of new affordable housing. By using methods such as site acquisition, predevelopment loans, and gap financing, Home Forward is able to invest in projects to expand the availability of housing that is affordable to families at different income levels in our community.

- Grant shortfalls: A large share of tenant/resident services are funded from grants and foundations. These funds augment local funds to provide supportive services and self-sufficiency services to residents. In order to optimize available services, any costs not eligible for state and local grants will be funded by single-fund flexibility.
- Emergency fund: In the event of an emergency that affects a public housing family's ability to live safely in their unit, Home Forward has created a fund to help the family temporarily find safe housing in a hotel.
- Landlord portal: Home Forward is developing an e-Center which will allow landlords to electronically process a Request for Tenancy Approval, view and schedule inspections, view payment information, and communicate with Home Forward. It is our objective to streamline the entire process and reduce the time required to lease an apartment or home to a voucher holder. Our staff is working with stakeholders to identify critical requirements and to develop a roadmap to deploying a beneficial tool to both our landlords and Home Forward.
- MTW Operating Reserve: Home Forward will set aside funds each year, as determined by the Board of Commissioners, towards building an Operating Reserve sufficient to fund four months of Operating Expenses plus one month of Housing Assistance Payments.



## Local Asset Management Plan

Is the PHA allocating costs within statute?

<input type="checkbox"/>	or	<input type="checkbox" value="No"/>
<input type="checkbox" value="Yes"/>	or	<input type="checkbox"/>

Is the PHA implementing a local asset management plan (LAMP)?

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix?

<input type="checkbox" value="Yes"/>	or	<input type="checkbox"/>
--------------------------------------	----	--------------------------

Local Asset Management Plan has been updated to reflect Agency name change, reclassification of certain positions, and minor updates to direct/indirect cost allocations to reflect current practices.

# Administrative

## Board Resolution

MEMORANDUM

To: Board of

From: Bianca Chinn, MTW Program



Commissioners Date: December 20, 2016

Analyst Subject: FY2018  
Moving to Work Plan

---

The Board of Commissioners is requested to authorize staff to submit the 19<sup>th</sup> Year Moving to Work (MTW) Annual Plan to the Department of Housing and Urban Development. This plan corresponds to Home Forward's fiscal year 2018.

ISSUE

Home Forward's designation as an MTW agency affords us regulatory relief in the administration of the Housing Choice Voucher program (Section 8) and Public Housing operating subsidies and capital allocations, as well as the ability to waive certain HUD regulations in favor of locally developed policies and initiatives for the benefit of our residents, participants and the community. All activities that use MTW authority must support at least one of three MTW objectives: (1) reduce costs and increase efficiencies, (2) increase housing choice for low-income families and, (3) provide incentives to families to become economically self-sufficient. Home Forward's current ten-year agreement with HUD preserves our MTW designation until 2028.

This year's MTW Plan has been presented to community stakeholders, the Resident Advisory Committee and the Board of Commissioners at a public hearing. All feedback and Home Forward responses are included in the MTW Plan and will be provided to HUD as part of our submission. Home Forward staff will continue to work closely with residents, participants and stakeholders as we refine and examine our existing activities, and as we consider any new activities to propose in future years.

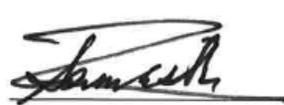


ADOPTED: DECEMBER 20, 2016

Attest:

  
\_\_\_\_\_  
Michael Buongiorno, Secretary

Home Forward:

  
\_\_\_\_\_  
James M. Smith, Chair

Certifications of Compliance

Annual Moving to Work Plan  
Certifications of Compliance

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

Certifications of Compliance with Regulations:  
Board Resolution to Accompany the Annual Moving to Work Plan\*

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning 4/1/2017, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105( a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

<u>Home Forward (Housing Authority of Portland)</u>	<u>QR002</u>
PHA Name	PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

James Smith  
Name of Authorized Official

  
Signature

Board Chair  
Title

December 20<sup>th</sup>, 2016  
Date

\*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

## Public Review Process

Home Forward has taken the steps below to ensure a thorough public process in the development and adoption of the MTW plan.

October 24, 2016:	Draft MTW Plan posted on Home Forward's website for public comment and input; no comment or input submitted as a result of this posting.
October 30 and November 6, 2016:	Public notice published in the Oregonian announcing the public hearing on November 15, 2016; text and Affidavit of Publication included in the following pages.
November 7, 2016:	Community stakeholder meeting held at Home Forward (135 SW Ash Street, Portland, OR 97204); people in attendance; comments included below.
November 7, 2016:	Presentation to Home Forward's Resident Advisory Committee; comments included below.
November 15, 2016:	Public hearing / Board meeting held at Multnomah County Building (501 SE Hawthorne Blvd, Portland, OR); no public comment received.
December 20, 2016:	Approval by Board of Commissioners

## Public Comments

Community Stakeholders Meeting (included representation from Human Solutions, Cascadia Behavioral Health, Central City Concern, Northwest Pilot Project, Multnomah County and City of Portland Joint Office of Homeless Services, Black Parent Initiative, and Northwest Housing Alternatives).

Question: Is Home Forward setting too high of GOALS for the program? (Regarding the list of benchmarks for GOALS in the Moving to Work Plan).

Answer: The Department of Housing and Urban Development (HUD) set standardized benchmarks for all Moving to Work (MTW) organizations that do not necessarily sync up with Home Forward's target outcomes for particular initiatives. When we do not meet a HUD or Home Forward benchmark, we will always provide a narrative to explain our outcomes in the MTW Report.

Question: Are there racial equity benchmarks?

Answer: Currently no. We could think about adding them. Equity benchmarks are not required in the MTW Plan, so Home Forward will consider these types of measurements more broadly than this plan.

Question: What is Home Forward's plans to help people who are leaving incarceration and/or people with convictions?

Answer: Home Forward is currently partnered with Metropolitan Public Defenders, a non-profit agency, to help participants and residents expunge criminal records. It is on page 74 of the Plan. Housing and Urban Development (HUD) has recently issued guidance related to Fair Housing Act standards towards the use of criminal records by housing providers. We are looking into more ways we can possibly help.

Resident Advisory Committee Meeting (13 resident members and 6 Home Forward staff present).

Question: Is there a part of the Moving to Work plan that addresses youth homelessness?

Answer: Home Forward currently partners with New Avenues for Youth (a community non-profit) under an existing MTW activity. The project is called New Doors and serves youth exiting the foster care system. We also manage vouchers under the Family Unification Program (FUP) for the same population.

Oregonian Public Notice  
PUBLIC HEARING

Home Forward (formerly the Housing Authority of Portland) will hold a public hearing on Tuesday, November 15, 2016 @ 6:15 pm at the Multnomah County Building, 501 SE Hawthorne Blvd, Portland, OR. The purpose of this meeting is to inform the public, including current and potential residents / participants, concerning activities that Home Forward operates under the Federal Department of Housing and Urban Development's national demonstration program called "Moving to Work" (MTW). There are no new initiatives being proposed at this time. Home Forward's activities are outlined in the "Draft FY2018 MTW Annual Plan." The draft plan is available for viewing on Home Forward's website: <http://www.homeforward.org/homeforward/moving-to-work>. Federal regulations under MTW authority emphasize cost-efficiency, resident self-sufficiency and increased housing choices. Home Forward will be accepting written comments regarding the Annual Plan until December 1, 2016. Please submit written comments to the following address: Home Forward, Attn: Blanca Chinn, 135 SW Ash Street, Portland, OR 97204. Comments can also be emailed to [Blanca.Chinn@homeforward.org](mailto:Blanca.Chinn@homeforward.org).

[www.homeforward.org/moving-to-work](http://www.homeforward.org/moving-to-work)

Federal regulations under MTW authority emphasize cost-efficiency, resident self-sufficiency and increased housing choices.

25th of County, as  
County of Multnomah,

Lois Miller being duly sworn, deposes that he/she is principal clerk of Oregonian Media Group; that The Oregonian is a public newspaper published in the city of Portland, with general circulation in Oregon, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

in Oregonian - 2016, 11/06/2016

*Lois Miller*

Principal Clerk of the Publisher

Sworn to and subscribed before me this 22th day of November 2016

*Kimberlee W O'Neil*

Notary Public

**PUBLIC HEARING**

Home Forward (formerly the Housing Authority of Portland) will hold a public hearing on Tuesday, November 15, 2016 @ 6:15 pm at the Multnomah County Building, 501 SE Hawthorne Blvd, Portland, OR. The purpose of this meeting is to inform the public, including current and potential residents / participants, concerning activities that Home Forward operates under the Federal Department of Housing and Urban Development's national demonstration program called "Moving to Work" (MTW). There are no new initiatives being proposed at this time. Home Forward's activities are outlined in the "Draft FY2018 MTW Annual Plan." The draft plan is available for viewing on Home Forward's website: <http://www.homeforward.org/homeforward/moving-to-work>. Federal regulations under MTW authority emphasize cost-efficiency, resident self-sufficiency and increased housing choices. Home Forward will be accepting written comments regarding the Annual Plan until December 1, 2016. Please submit written comments to the following address: Home Forward, Attn: Blanca Chinn, 135 SW Ash Street, Portland, OR 97204. Comments can also be emailed to [Blanca.Chinn@homeforward.org](mailto:Blanca.Chinn@homeforward.org).

<http://www.homeforward.org/homeforward/moving-to-work>

Federal regulations under MTW authority emphasize cost-efficiency, resident self-sufficiency and increased housing choices.

Home Forward will be accepting written comments regarding the Annual Plan until December 1, 2016. Please submit written comments to the following address: Home Forward, Attn: Blanca Chinn, 135 SW Ash Street, Portland, OR 97204. Comments can also be emailed to [Blanca.Chinn@homeforward.org](mailto:Blanca.Chinn@homeforward.org).



State of Oregon,) as  
County of Multnomah)

Lois Miller being duly sworn, deposes that he/she is principal clerk of Oregonian Media Group; that The Oregonian is a public newspaper published in the city of Portland, with general circulation in Oregon, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

The Oregonian 10/30, 11/06/2016

*Lois Miller*

Principal Clerk of the Publisher

Sworn to and subscribed before me this 22th day of November 2016

*Kimberlee W O'Neil*

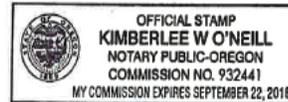
Notary Public

**PUBLIC HEARING**

Home Forward (formerly the Housing Authority of Portland) will hold a public hearing on Tuesday, November 15, 2016 @ 6:15 pm at the Multnomah County Building, 501 SE Hawthorne Blvd, Portland, OR. The purpose of this meeting is to inform the public, including current and potential residents / participants, concerning activities that Home Forward operates under the Federal Department of Housing and Urban Development's national demonstration program called "Moving to Work" (MTW). There are no new initiatives being proposed at this time. Home Forward's activities are outlined in the "Draft FY2018 MTW Annual Plan." The draft plan is available for viewing on Home Forward's website: <http://www.homeforward.org/homeforward/moving-to-work>. Federal regulations under MTW authority emphasize cost-efficiency, resident self-sufficiency and increased housing choices. Home Forward will be accepting written comments regarding the Annual Plan until December 1, 2016. Please submit written comments to the following address: Home Forward, Attn: Blanca Chinn, 135 SW Ash Street, Portland, OR 97204. Comments can also be emailed to [Blanca.Chinn@homeforward.org](mailto:Blanca.Chinn@homeforward.org).

Federal regulations under MTW authority emphasize cost-efficiency, resident self-sufficiency and increased housing choices.

Home Forward will be accepting written comments regarding the Annual Plan until December 1, 2016. Please submit written comments to the following address: Home Forward, Attn: Blanca Chinn, 135 SW Ash Street, Portland, OR 97204. Comments can also be emailed to [Blanca.Chinn@homeforward.org](mailto:Blanca.Chinn@homeforward.org).



The Oregonian  
LEGAL AFFIDAVIT  
AD#: 007887903



Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 06/30/2017

<b>Part I: Summary</b>					
PHA Name: Home Forward formerly known as Housing Authority of Portland		Grant Type and Number Capital Fund Program Grant No: OR16P00250112 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2012 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/2017 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	3,437,796.00			
16	1495.1 Relocation Costs				
17	1499 Development Activities <sup>4</sup>				

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 06/30/2017

<b>Part I: Summary</b>					
<b>PHA Name:</b> Home Forward formerly known as Housing Authority of Portland		<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P00250112 Replacement Housing Factor Grant No: Date of CFFP:		<b>FFY of Grant:2012</b> <b>FFY of Grant Approval:</b>	
<b>Type of Grant</b>					
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no: )	
<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/2017					
<input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	3,437,796.00			
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
<b>Signature of Executive Director</b>		<b>Date</b>		<b>Signature of Public Housing Director</b>	
		20/19/16			

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

<b>Part II: Supporting Pages</b>								
PHA Name: Home Forward formerly known as Housing Authority of Portland			Grant Type and Number Capital Fund Program Grant No: OR16P00250112 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2012		
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 <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
OR 2 – PHA Wide	15% Allowance to support operations	1492		687,559.20			687,559.20	FY15 Actuals
OR 2 – 064	Madrona Place	1492	45	100,000.00			100,000.00	FY17 Actuals
	Plumbing Repairs							
OR 2 – 064	Madrona Place	1492	45	250,000.00			250,000.00	FY17 Actuals
	Crawlspace and Waste Piping							
OR 2 – 111	Dekum Court	1492	40	2,621.62			2,621.62	FY16 Actuals
	Comprehensive Rehab							
OR 2 – 111	Dekum Court	1492	40	47,396.00	4,895.00		4,895.00	FY17 Actuals
	Sewer Repair							FY18 MTW Plan
OR 2 – 113	Tamarack	1492	120	1,541.42			1,541.42	FY16 Actuals
	Carport Emergency Repair							
OR 2 – 113	Tamarack	1492	120	30,176.13	35,086.02		35,086.02	FY17 Actuals
	Staircase Repair							
OR 2 – 113	Tamarack	1492	120	25,707.57	25,743.23		25,743.23	FY17 Actuals
	Roof & Ventilation							
OR 2 – 113	Tamarack	1492	120	15,000.00	1,879.43		1,879.43	FY17 Actuals
	Mold Remediation							FY18 MTW Plan
OR 2 – 114	Dahlke Manor	1492	115	12,365.00			12,365.00	FY16 Actuals
	Entry System Replacement							
OR 2 - 115	Holgate House	1492	80	22,727.00			22,727.00	FY16 Actuals
	Door Entry System							

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

<b>Part II: Supporting Pages</b>								
PHA Name: Home Forward formerly known as Housing Authority of Portland			Grant Type and Number Capital Fund Program Grant No: OR16P00250112 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2012		
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 <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
OR 2 - 115	Holgate House Exterior Sealing Project	1492	80	85,424.08	89,854.50		89,854.50	FY17 Actuals
OR 2 - 117	Schrunk Tower Fencing Replacement	1492	118	437.13	460.91		460.91	FY17 Actuals
OR 2 - 118	Williams Plaza Exterior Sealing Repairs	1492	101	147,143.59	147,243.59		147,243.59	FY16 Actuals
OR 2 - 118	Williams Plaza Water Leak	1492	101	26,007.59	26,007.59		26,007.59	FY16 Actuals
OR 2 - 121	Fir Acres Security Cameras	1492	31		35,454.00		35,454.00	FY17 Actuals FY18 MTW Plan
OR 2 - 124	Lexington Court Security Cameras	1492	20	50,000.00	23,536.52		23,536.52	FY17 Actuals
OR 2 - 124	Lexington Court New Playground Tiles	1492	20		9,500.00		9,500.00	FY17 Actuals
OR 2 - 125	Eastwood Court Security Cameras	1492	32	58,491.00	23,036.94		23,036.94	FY17 Actuals
OR 2 - 126	Carlton Court Siding Repairs	1492	24	54.60			54.60	FY16 Actuals
OR 2 - 138	Eliot Square Exterior Brick Repair & Flashing	1492	30		6,531.55		6,531.55	FY17 Actuals FY18 MTW Plan
OR 2 - 139	Medallion Apartments Water Intrusion	1492	90	150,000.00	50,294.75		50,294.75	FY17 Actuals

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

<b>Part II: Supporting Pages</b>								
<b>PHA Name: Home Forward formerly known as Housing Authority of Portland</b>			<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P00250112 CFFP (Yes/ No): Replacement Housing Factor Grant No:			<b>Federal FFY of Grant: 2012</b>		
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 <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
OR 2 – 152	Harold Lee Village	1492	10		727.44		727.44	FY17 Actuals
	Comprehensive Rehab							FY18 MTW Plan
OR 2 – 203	Maple Mallory	1492	48	44.54			44.54	FY16 Actuals
	Sewer Repairs							
OR 2 – 203	Maple Mallory	1492	48		4,697.64		4,697.64	FY17 Actuals
	Exterior Brick Repair & Flashing							FY18 MTW Plan
OR 2 -- PHA Wide	PH Portfolio	1492		275,000.00	35,394.00		35,394.00	FY17 Actuals
	Asbestos Abatement							FY18 MTW Plan
OR 2 – PHA Wide	PH Portfolio	1492		15,300.00			15,300.00	FY17 Actuals
	Waste Containers							
OR 2 – PHA Wide	PH Portfolio	1492		99,013.95	34,716.40		34,716.40	FY17 Actuals
	Capital Needs Assessments							FY18 MTW Plan
Blended Component Unit	Gallagher Plaza - 85 Stories Group 1 Preservation Initiative / Rehab			339,816.40	453,500.78		453,500.78	FY17 Actuals
Blended Component Unit	Northwest Tower - 85 Stories Group 1 Preservation Initiative / Rehab			275,738.70	389,423.09		389,423.09	FY17 Actuals
Blended Component Unit	Hollywood East - 85 Stories Group 2 Preservation Initiative / Rehab			313,110.58	426,794.96		426,794.96	FY17 Actuals
Blended Component Unit	Sellwood Center - 85 Stories Group 2 Preservation Initiative / Rehab			407,119.90	520,804.28		520,804.28	FY17 Actuals

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.



Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 06/30/2017

<b>Part I: Summary</b>					
PHA Name: Home Forward formerly known as Housing Authority of Portland		Grant Type and Number Capital Fund Program Grant No: OR16P00250113 Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2013 FFY of Grant Approval:
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/2017 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	3,305,451.25			
16	1495.1 Relocation Costs				
17	1499 Development Activities <sup>4</sup>				

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 06/30/2017

<b>Part I: Summary</b>					
<b>PHA Name:</b> Home Forward formerly known as Housing Authority of Portland		<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P00250113 Replacement Housing Factor Grant No: Date of CFFP:		<b>FFY of Grant: 2013</b> <b>FFY of Grant Approval:</b>	
<b>Type of Grant</b> <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:        ) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/2017 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	186,469.75			
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	3,491,921.00			
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
<b>Signature of Executive Director</b> 		<b>Date</b> 7/19/16		<b>Signature of Public Housing Director</b>  	
				<b>Date</b>	

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

<b>Part II: Supporting Pages</b>								
PHA Name: Home Forward formerly known as Housing Authority of Portland			Grant Type and Number Capital Fund Program Grant No: OR16P00250113 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2013		
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 <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
OR 2 – PHA Wide	15% Allowance to support operations	1492		523,788.00			523,788.00	FY16 Actuals
OR 2 – 064	Madrona Place RAD Conversion	1492	45		20,000.00		5,500.00	FY17 Actuals
OR 2 – 111	Dekum Court Sewer Repair	1492	40		42,501.00		0.00	FY18 MTW Plan
OR 2 – 113	Tamarack Mold Remediation	1492	120		13,120.57		11,387.90	FY17 Actuals
OR 2 - 113	Tamarack Emergency Sewer Repairs	1492	120		20,000.00		0.00	FY18 MTW Plan
OR 2 - 115	Holgate House Door Entry System	1492	80		8,290.00		8,290.00	FY17 Actuals
OR 2 - 115	Holgate House Emergency Plumbing Repairs	1492	80		280,000.00		138,102.33	FY18 MTW Plan
OR 2 - 117	Schrunk Tower Fencing Replacement	1492	118		6,709.00		6,709.00	FY17 Actuals
OR 2 – 121	Fir Acres Security Cameras	1492	31		52,046.00		0.00	FY18 MTW Plan
OR 2 – 124	Lexington Court Security Cameras	1492	20		26,463.48		22,918.54	FY17 MTW Plan
OR 2 – 124	Lexington Court New Playground Tiles	1492	20		1,254.00		1,254.00	FY17 Actuals

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

<b>Part II: Supporting Pages</b>								
PHA Name: Home Forward formerly known as Housing Authority of Portland			Grant Type and Number Capital Fund Program Grant No: OR16P00250113 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2013		
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 <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
OR 2 – 125	Eastwood Court Security Cameras	1492	32		35,454.06		19,946.57	FY17 MTW Plan
OR 2 – 138	Eliot Square Exterior Brick Repair & Flashing	1492	30	174,912.00	146,468.45		117,464.95	FY17 Actuals FY18 MTW Plan
OR 2 – 139	Medallion Apartments Concrete Restoration	1492	90		50,000.00		0.00	FY18 MTW Plan
OR 2 – 142	Celilo Court Comprehensive Rehab	1492	28	500,000.00	0.00		0.00	FY18 MTW Plan
OR 2 – 152	Harold Lee Village Comprehensive Rehab	1492	10	461,533.11	427,001.91		99,749.63	FY17 Actuals FY18 MTW Plan
OR 2 – 153	Floresta Ridge cap and Mold Remediation	1492	20		34,949.00		34,949.00	FY17 Actuals
OR 2 – 153	Floresta Roof Replacement	1492	20		250,000.00		181,296.12	FY17 Actuals FY18 MTW Plan
OR 2 – 203	Maple Mallory Exterior Brick Repair & Flashing	1492	48	125,000.00	282,302.36		250,767.91	FY17 Actuals FY18 MTW Plan
OR 2 – 203	Maple Mallory Door Entry System	1492	48		24,000.00		417.50	FY17 Actuals FY18 MTW Plan
OR 2 – PHA Wide	PH Portfolio Asbestos Abatement	1492			75,000.00		31,469.00	FY17 Actuals FY18 MTW Plan
OR 2 – PHA Wide	PH Portfolio Capital Needs Assessment	1492		200,986.05	100,000.00		4,054.60	FY17 Actuals FY18 MTW Plan

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

<b>Part II: Supporting Pages</b>								
<b>PHA Name: Home Forward formerly known as Housing Authority of Portland</b>			<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P00250113 CFFP (Yes/ No): Replacement Housing Factor Grant No:			<b>Federal FFY of Grant: 2013</b>		
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 <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
OR 2 – PHA Wide	PH Portfolio Fleet Vehicles	1492			26,907.70		26,907.70	FY17 Actuals
OR 2 – PHA Wide	PH Portfolio RAD I Conversion	1492		160,000.00	100,000.00		8,100.00	FY17 Actuals FY18 MTW Plan
OR 2 – PHA Wide	PH Portfolio RAD II Conversion	1492			280,000.00		0.00	FY18 MTW Plan
Blended Component Unit	Gallagher Plaza - 85 Stories Group 1 Preservation Initiative / Rehab	1492		289,808.02	125,000.00		0.00	FY18 MTW Plan
Blended Component Unit	Northwest Tower - 85 Stories Group 1 Preservation Initiative / Rehab	1492		289,808.02	125,000.00		0.00	FY18 MTW Plan
Blended Component Unit	Hollywood East - 85 Stories Group 2 Preservation Initiative / Rehab	1492		289,808.02	125,000.00		0.00	FY18 MTW Plan
Blended Component Unit	Sellwood Center - 85 Stories Group 2 Preservation Initiative / Rehab	1492		289,808.03	104,195.72		0.00	FY18 MTW Plan
OR 2 -	Debt Service – OR002D001B	9000		186,469.75	186,469.75		186,469.75	FY16 Actuals

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.



Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

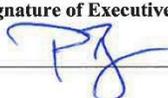
U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 06/30/2017

<b>Part I: Summary</b>					
PHA Name: Home Forward formerly known as Housing Authority of Portland		Grant Type and Number Capital Fund Program Grant No: OR16P00250114 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2014 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/2017 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment--Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	3,128,365.75			
16	1495.1 Relocation Costs				
17	1499 Development Activities <sup>4</sup>				

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
**Expires 06/30/2017**

<b>Part I: Summary</b>					
PHA Name: <b>Home Forward</b> formerly known as Housing Authority of Portland		Grant Type and Number Capital Fund Program Grant No: OR16P00250114 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant:2014 FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:                      ) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/2017 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	360,894.25			
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	3,489,260.00			
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director 		Date 10/19/16		Signature of Public Housing Director  	

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

Part II: Supporting Pages								
PHA Name: Home Forward formerly known as Housing Authority of Portland			Grant Type and Number Capital Fund Program Grant No: OR16P00250114 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2014		
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 <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
OR 2 – PHA Wide	15% Allowance to support operations	1492		697,852.00	523,389.00		523,389.00	FY17 Actuals
OR 2 - 113	Tamarack Emergency Sewer Repairs	1492	120	40,000.00	20,000.00		0.00	FY18 MTW Plan
OR 2 – 121	Fir Acres Security Cameras	1492	31	50,000.00	0.00		0.00	FY18 MTW Plan
OR 2 – 121	Fir Acres Tree Removal	1492	31		10,000.00		0.00	FY18 MTW Plan
OR 2 – 123	Stark Manor Security Cameras	1492	30	37,241.73	87,500.00		0.00	FY18 MTW Plan
OR 2 – 152	Harold Lee Village Comprehensive Rehab	1492	10	38,466.89	758,210.23		0.00	FY18 MTW Plan
OR 2 - 237	Powellhurst Comprehensive Rehab	1492	34	500,000.00	0.00		0.00	FY18 MTW Plan
OR 2 - 251	Tillicum North New Playground	1492	18		30,000.00		0.00	FY18 MTW Plan
OR 2 – PHA Wide	PH Portfolio Asbestos Abatement	1492			75,000.00		0.00	FY18 MTW Plan
OR 2 – PHA Wide	PH Portfolio Capital Needs Assessment	1492			100,000.00		0.00	FY18 MTW Plan

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

<b>Part II: Supporting Pages</b>								
<b>PHA Name: Home Forward formerly known as Housing Authority of Portland</b>			<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P00250114 CFFP (Yes/ No): Replacement Housing Factor Grant No:			<b>Federal FFY of Grant: 2014</b>		
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 <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
OR 2 – PHA Wide	PH Portfolio	1492		200,000.00	175,000.00		0.00	FY18 MTW Plan
	Exterior Building Painting							
OR 2 – PHA Wide	PH Portfolio	1492			200,000.00		0.00	FY18 MTW Plan
	RAD II Conversion							
Blended Component Unit	Gallagher Plaza - 85 Stories Group 1 Preservation Initiative / Rehab	1492		224,103.57	171,499.22		0.00	FY18 MTW Plan
Blended Component Unit	Northwest Tower - 85 Stories Group 1 Preservation Initiative / Rehab	1492		512,633.79	472,141.32		0.00	FY18 MTW Plan
Blended Component Unit	Hollywood East - 85 Stories Group 2 Preservation Initiative / Rehab	1492		412,332.04	505,625.98		0.00	FY18 MTW Plan
Blended Component Unit	Sellwood Center - 85 Stories Group 2 Preservation Initiative / Rehab	1492		415,735.73	0.00		0.00	FY18 MTW Plan
OR 2 -	Debt Service – OR002D001B	9000		360,894.25	360,894.25		360,894.25	FY17 Actuals



Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 06/30/2017

<b>Part I: Summary</b>	
PHA Name: Home Forward formerly known as Housing Authority of Portland	Grant Type and Number Capital Fund Program Grant No: OR16P00250115 Replacement Housing Factor Grant No: Date of CFFP:
	FFY of Grant: 2015 FFY of Grant Approval:

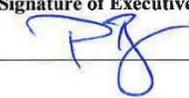
Type of Grant  
 Original Annual Statement       Reserve for Disasters/Emergencies       Revised Annual Statement (revision no: )  
 Performance and Evaluation Report for Period Ending: 03/2017       Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>4</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	3,310,117.00	3,484,525.00		
16	1495.1 Relocation Costs				
17	1499 Development Activities <sup>4</sup>				

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 06/30/2017

<b>Part I: Summary</b>				<b>FFY of Grant:2015</b>	
<b>PHA Name:</b> Home Forward formerly known as Housing Authority of Portland		<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P00250115 Replacement Housing Factor Grant No: Date of CFFP:		<b>FFY of Grant Approval:</b>	
<b>Type of Grant</b> <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:    ) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/2017 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	361,203.00	186,795.00		
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	3,671,320.00	3,671,320.00		
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
<b>Signature of Executive Director</b>		<b>Date</b>		<b>Signature of Public Housing Director</b>	
		10/19/16			

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

<b>Part II: Supporting Pages</b>								
PHA Name: Home Forward formerly known as Housing Authority of Portland			Grant Type and Number Capital Fund Program Grant No: OR16P00250115 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2015		
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 <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
OR 2 – PHA Wide	15% Allowance to support operations	1492		734,264.00	550,698.00		321,240.50	FY17 MTW Plan
OR 2 – 123	Stark Manor Security Cameras	1492	30	12,758.27	0.00		0.00	FY18 MTW Plan
OR 2 – 142	Celilo Court Comprehensive Rehab	1492	28		500,000.00		0.00	FY18 MTW Plan
OR 2 – 152	Harold Lee Village Comprehensive Rehab	1492	10		614,060.42		0.00	FY18 MTW Plan
OR 2 - 237	Powellhurst Comprehensive Rehab	1492	34		500,000.00		0.00	FY18 MTW Plan
OR 2 – PHA Wide	PH Portfolio Asbestos Abatement	1492			89,606.00		0.00	FY18 MTW Plan
OR 2 – PHA Wide	PH Portfolio Capital Needs Assessment	1492			65,283.60		0.00	FY18 MTW Plan
OR 2 – PHA Wide	PH Portfolio Exterior Building Painting	1492			100,000.00		0.00	FY18 MTW Plan
OR 2 – PHA Wide	PH Portfolio Flooring Replacement	1492			15,000.00		0.00	FY18 MTW Plan
OR 2 - PHA Wide	PH Portfolio Unidentified Future Projects	1492		1,472,917.53	0.00		0.00	FY18 MTW Plan
OR 2 – PHA Wide	PH Portfolio Discretionary Funds	1492		150,000.00	0.00		0.00	FY18 MTW Plan

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.





Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 06/30/2017

<b>Part I: Summary</b>					
PHA Name: Home Forward formerly known as Housing Authority of Portland		Grant Type and Number Capital Fund Program Grant No: OR16P00250116 Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2016 FFY of Grant Approval:
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/2017 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	3,602,203.50			
16	1495.1 Relocation Costs				
17	1499 Development Activities <sup>4</sup>				

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 06/30/2017

<b>Part I: Summary</b>						
<b>PHA Name:</b> Home Forward formerly known as Housing Authority of Portland		<b>Grant Type and Number</b> Capital Fund Program Grant No: OR16P00250116 Replacement Housing Factor Grant No: Date of CFFP:			<b>FFY of Grant:2016</b> <b>FFY of Grant Approval:</b>	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:    ) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 03/2017 <input type="checkbox"/> Final Performance and Evaluation Report						
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>		
		Original	Revised <sup>2</sup>	Obligated	Expended	
18a	1501 Collateralization or Debt Service paid by the PHA					
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	360,818.50				
19	1502 Contingency (may not exceed 8% of line 20)					
20	Amount of Annual Grant: (sum of lines 2 - 19)	3,963,022.00				
21	Amount of line 20 Related to LBP Activities					
22	Amount of line 20 Related to Section 504 Activities					
23	Amount of line 20 Related to Security - Soft Costs					
24	Amount of line 20 Related to Security - Hard Costs					
25	Amount of line 20 Related to Energy Conservation Measures					
<b>Signature of Executive Director</b>			<b>Signature of Public Housing Director</b>			
						
<b>Date</b>			<b>Date</b>			
10/19/16						

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.





# Appendix

## Local Asset Management Plan

### Home Forward Asset Management Program

The First Amendment to the Amended and Restated Moving to Work (MTW) Agreement allows Home Forward to develop a local asset management program for its Public Housing Program. The following describes Home Forward's asset management program and identifies where differences exist from HUD's asset management guidance.

#### Home Forward's Local Asset Management Program

Home Forward operates a property/project-based management, budgeting, accounting, and reporting system. Our project-based management systems include:

- Annual budgets are developed by on-site property managers. These budgets are reviewed and further consolidated into portfolio level budgets managed by housing program managers
- Budgets at the property level are provided an allocation of public housing operating subsidy based on factors which differentiate subsidy based on building age, type, size, and relative poverty of the population of the various public housing properties.
- Weekly monitoring of occupancy by property, including notices, vacancies, and applicants, is published to the Public Housing management and Executive management.
- Monthly property-based financial reports comparing month-to date and year-to-date actual to budget performance for the current year are provided to site managers, portfolio managers, and the Director of Property Management. These reports are available to other management staff as needed to monitor specific properties.
  - Monthly reviews are held at the property level with Site Managers and their portfolio management.
  - Quarterly reviews of the Public Housing portfolio in its entirety are held at the division level with Property Management Director and Regional Property Managers, as well as the Chief Operating Officer and Chief Financial Officer. This review covers each property Net Operating Income and Cash Flow.
- Home Forward applies the same project/program based budgeting system and financial performance review to its Housing Choice Voucher program, local MTW programs, and non-federal programs and properties.

### Home Forward's Cost Objectives

OMB Circular A-87 defines cost objective as follows: Cost objective means a function, organizational subdivision, contract, grant, or other activity for which cost data are needed and for which costs are incurred. The Cost Objectives for Home Forward's asset management program are the organizational subdivisions:

- Public Housing properties - includes resident services and management staff directly supporting this program
- Rent Assistance programs - includes management staff directly supporting this program and Family Self Sufficiency staff (including those supporting Public Housing residents)
- Moving to Work - includes activities related to our MTW agreement and local programs
- Affordable Housing
- Development

### Home Forward's Treatment of Certain Costs

Under OMB Circular A-87, there is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, it is essential that each item of cost be treated consistently in like circumstances, either as a direct or an indirect cost. Consistent with OMB Circular A-87 cost principles, Home Forward has identified all of its direct costs and segregated all its costs into pools, as either a direct, direct allocated, or indirect allocated. We have further divided the indirect allocated pool to assign costs based on a relevant metric, as described in Attachment 1.

- CORE Maintenance: Home Forward is committed to a cost effective approach to managing our public housing assets. As such, Home Forward has developed a balance of on-site capacity to perform property manager functions and basic maintenance/handyperson services, with more skilled services performed by a centralized group of trades and specialty staff (CORE maintenance). CORE maintenance performs services covering plumbing and electrical repairs, painting and pest control, as well as garbage and recycling. Although these maintenance functions are performed centrally, the decisions and control remains at the property level as it is the property manager and/or housing program manager who determines the level of service required from the CORE maintenance group. All services are provided on a fee for service basis.
- Procurement: Home Forward has adopted procurement policies that balance the need for expedient and on-site response through delegated authorization to site staff for purchases under \$5,000. Purchases greater than this limit requires engaging central procurement. The Procurement staff are well trained in the special requirements of procuring goods and services for a federal program and provides necessary contract reporting requirements as well. Central procurement services are part of Home Forward's indirect overhead allocation.
- Human Resources: Along with the public housing program and its Section 8 voucher program, Home Forward has non-federal affordable properties, a development group, and locally funded rent assistance programs. Home Forward's Human Resources department serves the entire

agency and certain human resource activities that HUD would consider a direct cost, such as recruitment and pre-employment drug testing and screening, are centralized and are part of Home Forward's indirect overhead allocation. Home Forward has determined that the cost of keeping extremely detailed records of HR activity for direct cost assignment exceeds the value received from such effort.

- Information Technology: Hardware and software costs will be directly charged to the appropriate cost objective when such costs are available and specific to that cost objective. When a reasonable measurement of such IT costs can be obtained, an allocation based on the number of users (computers, software applications, etc.) will be utilized to directly charge the cost objective.
- Resident Services: A large share of tenant/resident services are funded from grants and foundations and these funds augment local funds to provide supportive services and self-sufficiency services to residents. In order to optimize available services, any costs not eligible for state and local grants will be funded by Home Forward's public housing properties and housing choice voucher program.
- Rent: Home Forward charges rent to each cost objective based on the space they occupy in our central office building. Rent is based on estimated costs and adjusted for actual costs at year-end.

#### **Home Forward's Treatment of Public Housing Operating Subsidy**

Home Forward's flexibility to use MTW funding resources to support its low-income housing programs is central to our Asset Management Program. Home Forward will exercise our contractual authority to move our MTW funds and project cash flow among projects and programs as the Authority deems necessary to further our mission and preserve our low income housing assets and local programs.

#### **Home Forward's Indirect Cost Allocations**

Costs that can specifically and efficiently be identified to a cost objective are counted as direct costs to that objective. Costs that cannot be readily or efficiently identified as specifically benefiting a cost objective will be considered indirect and allocated. The *Home Forward Allocation Process – Process Flow Diagram* shown at the end of this policy is a graphic representation of Home Forward's allocation methodology. Home Forward has determined that some costs, defined as "direct costs" by HUD for asset management, require effort disproportionate to the results achieved and have included those costs as part of the indirect cost pool allocated to cost objectives as overhead.

#### ***Home Forward Indirect Costs***

OMB Circular A-87 defines indirect costs as those (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Home Forward's indirect costs include, but are not limited to:

- Executive
- Policy & Planning
- Accounting & Finance

- Purchasing
- Human Resources, including job applicant screening, payroll, labor negotiations & organization wide training
- Information Technology: costs not specifically identified and charged as a direct expense to a cost objective

**Differences – HUD Asset Management vs. Home Forward Local Asset Management Program**

Home Forward is required to describe in the MTW Annual Plan differences between our asset management program and HUD’s asset management program as described in HUD’s Financial Management Guidebook. Below are several key differences:

- HUD’s asset management system and fee for service is limited in focusing only on a fee for service at the Public Housing (PH) property level and voucher program. Home Forward has implemented an indirect allocation methodology that is much more comprehensive than HUD’s asset management system which includes all of Home Forward’s cost objectives listed above.
- Home Forward has defined the treatment of direct and indirect costs differently than HUD’s asset management program. From the agency perspective, we view the program operations management as direct costs of the program.
- These differences include, but are not limited to:
  - HUD Indirect/Home Forward Direct:
    - Portfolio and program (“regional”) management, including hiring, supervision and termination of frontline staff is considered a direct cost. These costs are pooled and then allocated to each property based on units, vouchers, or other relevant metrics. Work with auditors and audit preparation by HCV and PH staff is considered a direct expense. Executive management is considered an indirect cost.
    - Storage of HCV and PH records and adherence to federal and/or state records retention requirements will be considered a direct cost of the program.
    - Development and oversight of office furniture, equipment and vehicle replacement plans will be considered a direct cost of the program.
    - Advertising (notification) costs specific to HCV, including applicants and landlords, will be considered a direct expense.
  - HUD Direct/Home Forward Indirect:
    - Advertising for new hires will be considered indirect and allocated to the program and properties.
    - Staff recruiting and background checks, etc. will be considered indirect and allocated to the program and properties.
  - Other:

- Using MTW authority to improve efficiencies across programs, all staff associated with the Family Self Sufficiency program, regardless of serving public housing or housing choice voucher residents, will be considered a direct cost of the housing choice voucher program and managed by the HCV management.
- Preparation and submission of HCV and public housing program budgets, financial reports, etc. to HUD and others will be either direct or indirect, depending on the department from which the reports are prepared. If prepared by program staff, costs will be considered direct. If prepared by administrative department staff, costs will be considered indirect and allocated to the program and properties.
- Investment and reporting on HCV proceeds will be either direct or indirect, depending on the department from which the reports are prepared. If prepared by program staff, costs will be considered direct. If prepared by administrative department staff, costs will be considered indirect and allocated to the program and properties.
- HUD's rules limit the transfer of cash flow between projects, programs, and business activities. Home Forward intends to fully use its MTW resources and flexibility to move project cash flow among projects as locally determined and use MTW funding flexibility to provide additional funding to public housing properties when appropriate and necessary to provide for and preserve our public housing assets.
- HUD's rules provide that maintenance staff be maintained at the property level. Home Forward's asset management program reflects a cost-effective balance of on-site and central maintenance services for repairs, unit turnover, landscaping, and asset preservation work.
- HUD's rules provide that purchasing is performed at the property level. Home Forward's asset management program reflects a cost-effective balance of on-site and central purchasing, depending on the total cost of procurement and complexity of applicable procurement laws and reporting requirements.
- HUD intends certain property management activities to be at the property level. Home Forward has centralized selected property management functions, including but not limited to denial hearings, occupancy management, transfers, reasonable accommodations, auditing, training, compliance, and some waitlist management, and will allocate these costs as a direct expense to the properties based on a relevant metric such as units.
- Home Forward employs its own development staff. Any work on Public Housing Capital projects will be subject to a cost recovery fee paid from the capital fund to cover costs of development staff engaged in such capital projects.

### ***Balance sheet accounts***

Most balance sheet accounts will be reported in compliance with HUD's Asset Management Requirements and some will deviate from HUD's requirements, as discussed below:

- Cash
- Restricted Cash
- Petty Cash

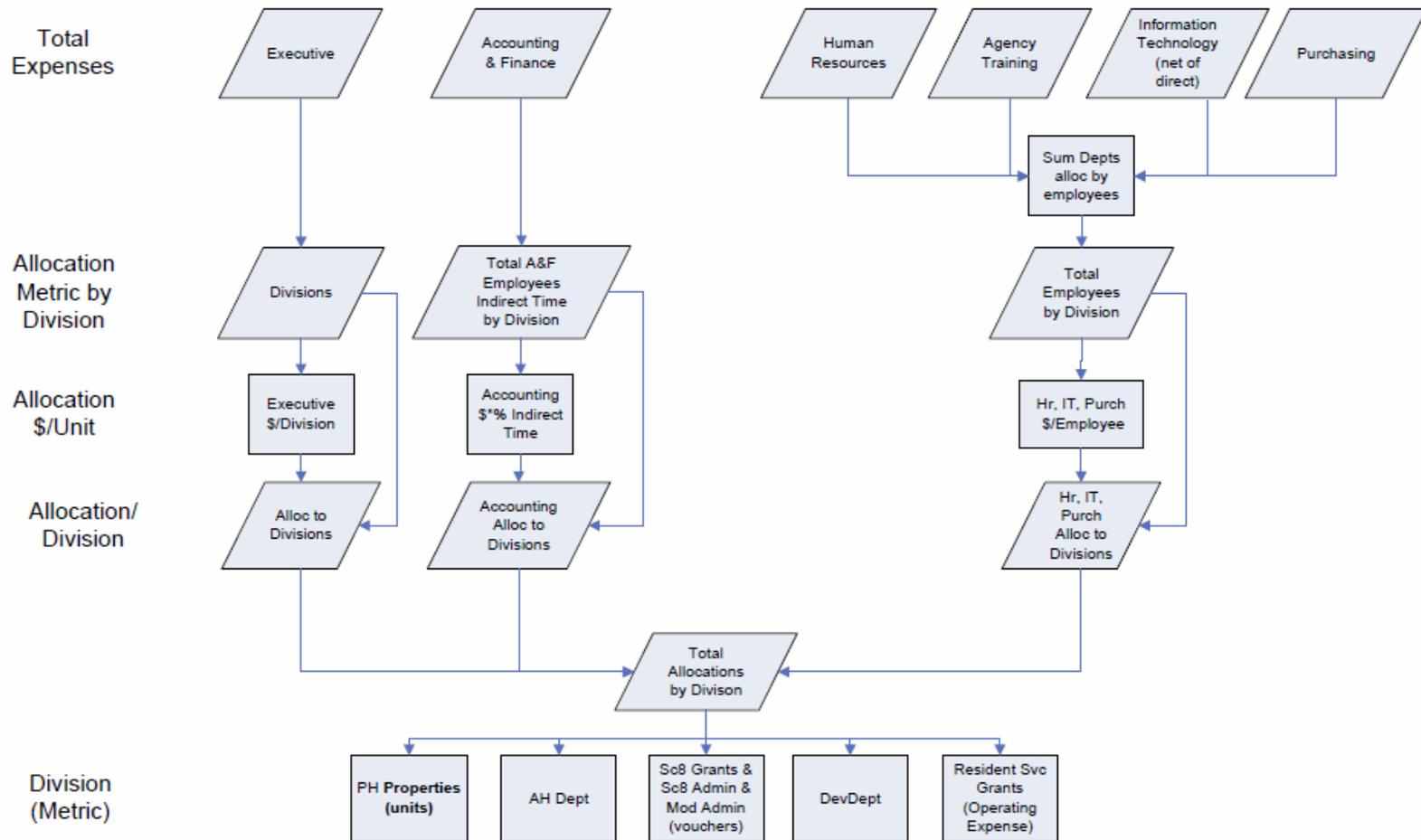
- Investments
- Selected Prepaid Expenses and Deferred Charges
- Selected Accrued Liabilities
- Payroll Liabilities
- Compensated Absences
- Other Post-Employment Benefits (OPEB) Liability
- Unfunded Pension Liabilities (GASB 68)
- Unrestricted and Restricted Net Assets

Home Forward's asset management program will maintain the above balance sheet accounts centrally. Maintaining these accounts centrally has proven to be the most cost effective and least labor intensive method ensuring efficient accounting operations and ultimately reducing costs charged to the programs. This deviates from HUD's asset management requirements as these accounts will not be reported at the AMP or program. Additionally, the centralization of cash and investments is in keeping with the single fund precept of our MTW authority. For those balance sheet accounts that are originated from expense entries, the related expenses will continue to be reported as an expense to the appropriate program, department and AMP-based income and expense statement through direct charges or allocations.

The agency is continually reviewing our asset management practices and will likely revise our approach over the coming years.

# Home Forward Allocation Process

Process Flow Diagram



## ATTACHMENT R - RENTAL ASSISTANCE DEMONSTRATION

Home Forward is a successful applicant in the Rental Assistance Demonstration (RAD).

In May 2015 Home Forward submitted six Rental Assistance Demonstration (RAD) applications for six properties, with a total of 285 public housing units. We received six initial Commitments to enter into a Housing Assistance Payment (CHAPs) in September 2015, with amended CHAPS issued in March 2016 (RAD Phase 1). In addition, Home Forward received 24 additional CHAPs in August 2016, totaling 498 units (part of RAD Phase 2). Home Forward is currently working with HUD to determine the timeline of conversion for these properties (see section titled [Public Housing Strategy](#)).

Home Forward is converting to project-based vouchers under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to project-based vouchers, Home Forward will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2012-32, REV-2; and Joint Housing PIH Notice H-2014-09/PHI-2014-17. These resident rights, participation, waiting list and grievance procedures are appended to this attachment. Additionally, Home Forward certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Housing Authorities access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, Home Forward's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Home Forward may also borrow funds to address their capital needs. Project-based voucher subsidy is sized to replace the reduction in Capital Funds and operating subsidy lost from the RAD conversions. Home Forward currently has debt under the Capital Fund Financing Program and will be working with Wells Fargo to address outstanding debt issues, which may result in additional reductions of capital funds. Regardless of any funding changes that may occur as a result of conversion under RAD, Home Forward certifies that it will maintain its continued service level.

Under HUD Notice PIH-2012-32, REV-2, Home Forward's RAD conversion is detailed below as part of its Annual Moving to Work Plan.

The following are the remaining public housing properties that Home Forward anticipates RAD closing or Section 18 approval, with properties converting through FY2021. At time of this writing, Home Forward is working with HUD to identify the order properties will close.

**Development #1**

<b>Development Name</b>	<b>Tillicum South</b>		
<b>PIC Development ID #</b>	<b>OR0020151</b>		
Conversion Type	Project-based vouchers		
Total Current Units	12	Total Post-RAD Units	12
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$15,045.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	12 3-bedroom units	Post-Conversion Bedroom Type	12 3-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward’s public housing site-based waiting list for Tillicum South will be moved onto a Home Forward project based voucher site-based waiting list for Tillicum South. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Tillicum South.		
Other Information	CHAP awarded August 2016		

**Development #2**

<b>Development Name</b>	<b>Powellhurst Woods</b>		
<b>PIC Development ID #</b>	<b>OR002000237</b>		
Conversion Type	Project-based vouchers		
Total Current Units	34	Total Post-RAD Units	34
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$60,065.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	23 2-bedroom units 11 3-bedroom units	Post-Conversion Bedroom Type	23 2-bedroom units 11 3-bedroom units

De Minimis Reduction	None
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Powellhurst Woods will be moved onto a Home Forward project based voucher site-based waiting list for Powellhurst Woods. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Powellhurst Woods.
Other Information	CHAP awarded August 2016

### Development #3

<b>Development Name</b>	<b>Tillicum North</b>		
<b>PIC Development ID #</b>	<b>OR002000251</b>		
Conversion Type	Project-based vouchers		
Total Current Units	18	Total Post-RAD Units	18
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$22,567.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	16 3-bedroom units	Post-Conversion Bedroom Type	16 3-bedroom units
	2 3-bedroom accessible units		2 3-bedroom accessible units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Tillicum North will be moved onto a Home Forward project based voucher site-based waiting list for Tillicum North. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Tillicum North.		
Other Information	CHAP awarded August 2016		

### Development #4

<b>Development Name</b>	<b>Hunters Run</b>		
<b>PIC Development ID #</b>	<b>OR002000252</b>		
Conversion Type	Project-based vouchers		
Total Current Units	10	Total Post-RAD Units	10
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family

Capital Fund Allocation	\$12,545.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	8 3-bedroom units 2 3-bedroom accessible units	Post-Conversion Bedroom Type	10 3-bedroom units 2 3-bedroom accessible units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Hunters Run will be moved onto a Home Forward project based voucher site-based waiting list for Hunters Run. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Hunters Run.		
Other Information	CHAP awarded August 2016		

#### Development #5

<b>Development Name</b>	<b>Fir Acres</b>		
<b>PIC Development ID #</b>	<b>OR002000121</b>		
Conversion Type	Project-based vouchers		
Total Current Units	32	Total Post-RAD Units	32
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$57,583.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	19 2-bedroom units 1 2-bedroom accessible unit 12 3-bedroom units	Post-Conversion Bedroom Type	19 2-bedroom units 1 2-bedroom accessible unit 12 3-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Fir Acres will be moved onto a Home Forward project based voucher site-based waiting list for Fir Acres. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Fir Acres.		
Other Information	CHAP awarded August 2016		

Development #6

<b>Development Name</b>	Alderwood		
<b>PIC Development ID #</b>	OR002000337		
Conversion Type	Project-based vouchers		
Total Current Units	20	Total Post-RAD Units	20
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$36,332.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	13 2-bedroom units 7 3-bedroom units	Post-Conversion Bedroom Type	13 2-bedroom units 7 3-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward’s public housing site-based waiting list for Alderwood will be moved onto a Home Forward project based voucher site-based waiting list for Alderwood. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Alderwood.		
Other Information	CHAP awarded August 2016		

Development # 7

<b>Development Name</b>	Medallion Apartments		
<b>PIC Development ID #</b>	OR002000139		
Conversion Type	Section 18 project based vouchers or RAD project based vouchers		
Total Current Units	90	Total Post-RAD Units	90
Pre-RAD Unit Type	Senior/People with disabilities	Post-RAD Unit Type	Senior/People with disabilities
Capital Fund Allocation	\$137,121.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	85 1-bedroom units 3 1-bedroom accessible units 2 2-bedroom accessible units	Post-Conversion Bedroom Type	85 1-bedroom units 3 1-bedroom accessible units 2 2-bedroom accessible units
De Minimis Reduction	None		

Transfer of Waiting List	If converted under RAD, applicants on Home Forward's public housing site-based waiting list for Medallion Apartments will be moved onto a Home Forward project based voucher site-based waiting list for Medallion Apartments. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Medallion Apartments. If approved for Section 18 Home Forward will not pursue RAD conversion for Medallion Apartments.
Other Information	Home Forward applied for Section 18 for Medallion Apartments prior to RAD and is anticipating a decision to be made by HUD. If approved for Section 18 Home Forward will not pursue RAD conversion for Medallion Apartments. CHAP awarded in October 2016.

**Development # 8**

<b>Development Name</b>	<b>Ruth Haefner Apartments</b>		
<b>PIC Development ID #</b>	<b>OR002000140</b>		
Conversion Type	Section 18 project based vouchers or RAD project based vouchers		
Total Current Units	73	Total Post-RAD Units	73
Pre-RAD Unit Type	Senior/People with disabilities	Post-RAD Unit Type	Senior/People with disabilities
Capital Fund Allocation	\$110,562.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	65 1-bedroom 8 1- bedroom accessible units	Post-Conversion Bedroom Type	65 1-bedroom 8 1- bedroom accessible units

De Minimis Reduction	None
Transfer of Waiting List	If converted to RAD, applicants on Home Forward's public housing site-based waiting list for Ruth Haefner Apartments will be moved onto a Home Forward project based voucher site-based waiting list for Ruth Haefner Apartments. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Ruth Haefner Apartments. If approved for Section 18 Home Forward will not pursue RAD conversion for Ruth Haefner Apartments.
Other Information	CHAP awarded August 2016. Home Forward applied for Section 18 for Ruth Haefner Apartments prior to RAD and is anticipating a decision to be made by HUD. If approved for Section 18 Home Forward will not pursue RAD conversion for Ruth Haefner Apartments.

Development # 9

<b>Development Name</b>	<b>Townhouse Terrace</b>		
<b>PIC Development ID #</b>	<b>OR002000122</b>		
Conversion Type	Project-Based Vouchers		
Total Current Units	32	Total Post-RAD Units	32
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$57,595.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	19 2-bedroom units	Post-Conversion Bedroom Type	19 2-bedroom units
	1 2-bedroom accessible unit		1 2-bedroom accessible unit
	12 3-bedroom units		12 3-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward’s public housing site-based waiting list for Townhouse Terrace will be moved onto a Home Forward project based voucher site-based waiting list for Townhouse Terrace. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Townhouse Terrace.		
Other Information	CHAP received August 2016		

Development # 10

<b>Development Name</b>	<b>Stark Manor</b>		
<b>PIC Development ID #</b>	<b>OR002000123</b>		
Conversion Type	Project-Based Vouchers		
Total Current Units	30	Total Post-RAD Units	30
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$52,425.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	18 2-bedroom units	Post-Conversion Bedroom Type	18 2-bedroom units
	12 3-bedroom units		12 3-bedroom units
De Minimis Reduction	None		

Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Stark Manor will be moved onto a Home Forward project based voucher site-based waiting list for Stark Manor. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Stark Manor.
Other Information	CHAP received August 2016

**Development # 11**

<b>Development Name</b>	<b>Lexington Court</b>		
<b>PIC Development ID #</b>	<b>OR002000124</b>		
Conversion Type	Project-Based Vouchers		
Total Current Units	20	Total Post-RAD Units	20
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$35,885.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	12 2-bedroom units 8 3-bedroom units	Post-Conversion Bedroom Type	12 2-bedroom units 8 3-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Lexington Court will be moved onto a Home Forward project based voucher site-based waiting list for Lexington Court. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Lexington Court.		
Other Information	CHAP received August 2016		

**Development # 12**

<b>Development Name</b>	<b>Eastwood Court</b>		
<b>PIC Development ID #</b>	<b>OR002000125</b>		
Conversion Type	Project-Based Vouchers		
Total Current Units	32	Total Post-RAD Units	32
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$57,728.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	19 2-bedroom units 12 3-bedroom units 1 3-bedroom accessible unit	Post-Conversion Bedroom Type	19 2-bedroom units 12 3-bedroom units 1 3-bedroom accessible unit

De Minimis Reduction None

Transfer of Waiting List Upon conversion to RAD, applicants on Home Forward’s public housing site-based waiting list for Eastwood Court will be moved onto a Home Forward project based voucher site-based waiting list for Eastwood Court. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Eastwood Court.

Other Information CHAP received August 2016

**Development # 13**

**Development Name** Carlton Court

**PIC Development ID #** OR002000126

Conversion Type Project-Based Vouchers

Total Current Units 24

Pre-RAD Unit Type Family

Capital Fund Allocation \$43,363.00

Transfer of Assistance None

Pre-Conversion Bedroom Type 14 2-bedroom units  
10 3-bedroom units

Total Post-RAD Units 24

Post-RAD Unit Type Family

Post-Conversion Bedroom Type 14 2-bedroom units  
10 3-bedroom units

De Minimis Reduction None

Transfer of Waiting List Upon conversion to RAD, applicants on Home Forward’s public housing site-based waiting list for Carlton Court will be moved onto a Home Forward project based voucher site-based waiting list for Carlton Court. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Carlton Court.

Other Information CHAP received August 2016

**Development # 14**

**Development Name** Slavin Court

**PIC Development ID #** OR002000131

Conversion Type Project-Based Vouchers

Total Current Units 24

Pre-RAD Unit Type Family

Total Post-RAD Units 24

Post-RAD Unit Type Family

Capital Fund Allocation	\$47,903.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	18 3-bedroom units 6 4-bedroom units	Post-Conversion Bedroom Type	18 3-bedroom units 6 4-bedroom units

De Minimis Reduction	None
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Slavin Court will be moved onto a Home Forward project based voucher site-based waiting list for Carlton Court. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Slavin Court.

Other Information CHAP received August 2016

**Development # 15**

<b>Development Name</b>	<b>Demar Downs</b>		
<b>PIC Development ID #</b>	<b>OR002000132</b>		
Conversion Type	Project-Based Vouchers		
Total Current Units	18	Total Post-RAD Units	18
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$31,569.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	15 2-bedroom units 3 2-bedroom accessible units	Post-Conversion Bedroom Type	15 2-bedroom units 3 2-bedroom accessible units

De Minimis Reduction	None
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Demar Downs will be moved onto a Home Forward project based voucher site-based waiting list for Demar Downs. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Demar Downs.

Other Information CHAP received August 2016

**Development # 16**

<b>Development Name</b>	<b>Eliot Square</b>		
<b>PIC Development ID #</b>	<b>OR002000138</b>		
Conversion Type	Project-Based Vouchers		
Total Current Units	30	Total Post-RAD Units	30

Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$57,318.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	11 2-bedroom units 1 2-bedroom accessible unit 14 3-bedroom units 4 4-bedroom units	Post-Conversion Bedroom Type	11 2-bedroom units 1 2-bedroom accessible unit 14 3-bedroom units 4 4-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Eliot Square will be moved onto a Home Forward project based voucher site-based waiting list for Eliot Square. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Eliot Square.		
Other Information	CHAP received August 2016		

**Development # 17**

<b>Development Name</b>	<b>Celilo Court</b>		
<b>PIC Development ID #</b>	<b>OR002000142</b>		
Conversion Type	Project-Based Vouchers		
Total Current Units	28	Total Post-RAD Units	28
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$51,390.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	15 2-bedroom units 2 2-bedroom accessible units 11 3-bedroom units	Post-Conversion Bedroom Type	15 2-bedroom units 2 2-bedroom accessible units 11 3-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Celilo Court will be moved onto a Home Forward project based voucher site-based waiting list for Celilo Court. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Celilo Court.		
Other Information	CHAP received August 2016		

Development # 18

<b>Development Name</b>	Harold Lee Village		
<b>PIC Development ID #</b>	OR002000152		
Conversion Type	Project-Based Vouchers		
Total Current Units	10	Total Post-RAD Units	10
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$12,545.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	10 3-bedroom units	Post-Conversion Bedroom Type	10 3-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Harold Lee Village will be moved onto a Home Forward project based voucher site-based waiting list for Harold Lee Village. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Harold Lee Village.		
Other Information	CHAP received August 2016		

Development # 19

<b>Development Name</b>	Floresta		
<b>PIC Development ID #</b>	OR002000152		
Conversion Type	Project-Based Vouchers		
Total Current Units	20	Total Post-RAD Units	20
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$23,473.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	7 2-bedroom units 2 2-bedroom accessible units 11 3-bedroom units	Post-Conversion Bedroom Type	7 2-bedroom units 2 2-bedroom accessible units 11 3-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Floresta will be moved onto a Home Forward project based voucher site-based waiting list for Floresta. The applicants will		

retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Floresta.

Other Information CHAP received August 2016

**Development # 20**

<b>Development Name</b>	<b>Maple Mallory</b>		
<b>PIC Development ID #</b>	<b>OR002000203</b>		
Conversion Type	Project-Based Vouchers		
Total Current Units	48	Total Post-RAD Units	48
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$74,808.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	24 1-bedroom units	Post-Conversion Bedroom Type	24 1-bedroom units
	24 2-bedroom units		24 2-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward’s public housing site-based waiting list for Maple Mallory will be moved onto a Home Forward project based voucher site-based waiting list for Maple Mallory. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Maple Mallory.		
Other Information	CHAP received August 2016		

**Development # 21**

<b>Development Name</b>	<b>Bel Park</b>		
<b>PIC Development ID #</b>	<b>OR002000232</b>		
Conversion Type	Project-Based Vouchers		
Total Current Units	10	Total Post-RAD Units	10
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$14,643.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	2 studio units	Post-Conversion Bedroom Type	2 studio units
	8 1-bedroom units		8 1-bedroom units

De Minimis Reduction None

Transfer of Waiting List Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Bel Park will be moved onto a Home Forward project based voucher site-based waiting list for Bel Park. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Bel Park.

Other Information CHAP received August 2016

**Development # 22**

**Development Name** Winchell Court

**PIC Development ID #** OR002000236

Conversion Type Project-Based Vouchers

Total Current Units 10

Pre-RAD Unit Type Family

Capital Fund Allocation \$15,830.00

Transfer of Assistance None

Pre-Conversion Bedroom Type 8 1-bedroom units  
2 2-bedroom units

Total Post-RAD Units 10

Post-RAD Unit Type Family

Post-Conversion Bedroom Type 8 1-bedroom units  
2 2-bedroom units

De Minimis Reduction None

Transfer of Waiting List Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Winchell Court will be moved onto a Home Forward project based voucher site-based waiting list for Winchell Court. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Winchell Court.

Other Information CHAP received August 2016

**Development # 23**

**Development Name** Camelia Court

**PIC Development ID #** OR002000332

Conversion Type Project-Based Vouchers

Total Current Units 14

Pre-RAD Unit Type Family

Capital Fund Allocation \$21,045.00

Transfer of Assistance None

Total Post-RAD Units 14

Post-RAD Unit Type Family

Pre-Conversion Bedroom Type 14 1-bedroom units                      Post-Conversion Bedroom Type 14 1-bedroom units

De Minimis Reduction None  
Transfer of Waiting List Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Camelia Court will be moved onto a Home Forward project based voucher site-based waiting list for Camelia Court. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Camelia Court.

Other Information CHAP received August 2016

#### Development # 24

**Development Name** Cora Park

**PIC Development ID #** OR002000336

Conversion Type Project-Based Vouchers

Total Current Units 10

Total Post-RAD Units 10

Pre-RAD Unit Type Family

Post-RAD Unit Type Family

Capital Fund Allocation \$18,166.00

Transfer of Assistance None

Pre-Conversion Bedroom Type 6 2-bedroom units  
4 3-bedroom units

Post-Conversion Bedroom Type 6 2-bedroom units  
4 3-bedroom units

De Minimis Reduction None

Transfer of Waiting List Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Cora Park will be moved onto a Home Forward project based voucher site-based waiting list for Cora Park. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Cora Park.

Other Information CHAP received August 2016

#### Development # 25

**Development Name** Chateau Apartments

**PIC Development ID #** OR002000436

Conversion Type Project-Based Vouchers

Total Current Units 10

Total Post-RAD Units 10

Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$17,107.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	10 2-bedroom units	Post-Conversion Bedroom Type	10 2-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Winchell Court will be moved onto a Home Forward project based voucher site-based waiting list for Winchell Court. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Winchell Court.		
Other Information	CHAP received August 2016		

**Development # 26**

<b>Development Name</b>	<b>Humboldt Gardens</b>		
<b>PIC Development ID #</b>	<b>OR002000058</b>		
Conversion Type	Project-Based Vouchers		
Total Current ACC Units	100	Total Post-RAD ACC Units	100
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$102,750.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	51 1-bedroom accessible units 1 2-bedroom unit 36 2-bedroom accessible units 9 3-bedroom units 3 4-bedroom units	Post-Conversion Bedroom Type	51 1-bedroom accessible units 1 2-bedroom unit 36 2-bedroom accessible units 9 3-bedroom units 3 4-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for Humboldt Gardens will be moved onto a Home Forward project based voucher site-based waiting list for Humboldt Gardens. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Humboldt Gardens.		
Other Information	CHAP received October 2016		

Development # 27

<b>Development Name</b>	New Columbia Haven Limited Partnership		
<b>PIC Development ID #</b>	OR002000305		
Conversion Type	Project-Based Vouchers		
Total Current ACC Units	29	Total Post-RAD ACC Units	29
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$32,493.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	11 1-bedroom units	Post-Conversion Bedroom Type	11 1-bedroom units
	1 1-bedroom accessible unit		1 1-bedroom accessible unit
	6 2-bedroom units		6 2-bedroom units
	8 3-bedroom units		8 3-bedroom units
	1 3-bedroom accessible unit		1 3-bedroom accessible unit
	2 5-bedroom units		2 5-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward’s public housing site-based waiting list for New Columbia Haven Limited Partnership will be moved onto a Home Forward project based voucher site-based waiting list for New Columbia Haven Limited Partnership. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for New Columbia Haven Limited Partnership.		
Other Information	CHAP received October 2016		

Development # 28

<b>Development Name</b>	New Columbia Cecelia Limited Partnership		
<b>PIC Development ID #</b>	OR002000310		
Conversion Type	Project-Based Vouchers		
Total Current ACC Units	72	Total Post-RAD ACC Units	72
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$82,022.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	13 1-bedroom units	Post-Conversion Bedroom Type	13 1-bedroom units

41 2-bedroom units	41 2-bedroom units
5 2-bedroom accessible units	5 2-bedroom accessible units
1 3-bedroom accessible unit	1 3-bedroom accessible unit
5 4-bedroom units	5 4-bedroom units
3 4-bedroom accessible units	3 4-bedroom accessible units
3 5-bedroom units	3 5-bedroom units

De Minimis Reduction	None
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for New Columbia Cecelia Limited Partnership will be moved onto a Home Forward project based voucher site-based waiting list for New Columbia Cecelia Limited Partnership. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for New Columbia Cecelia Limited Partnership.
Other Information	CHAP received October 2016

**Development # 29**

<b>Development Name</b>	<b>New Columbia Trouton Limited Partnership</b>		
<b>PIC Development ID #</b>	<b>OR002000315</b>		
Conversion Type	Project-Based Vouchers		
Total Current ACC Units	125	Total Post-RAD ACC Units	125
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$144,295.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	31 1-bedroom units	Post-Conversion Bedroom Type	31 1-bedroom units
	16 1-bedroom accessible units		16 1-bedroom accessible units
	11 2-bedroom units		11 2-bedroom units
	9 2-bedroom accessible units		9 2-bedroom accessible units
	29 3-bedroom units		29 3-bedroom units
	5 3-bedroom accessible units		5 3-bedroom accessible units
	21 4-bedroom units		21 4-bedroom units
	3 4-bedroom accessible units		3 4-bedroom accessible units
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for New Columbia Trouton Limited Partnership will be moved onto a Home Forward project based voucher site-based		

waiting list for New Columbia Trouton Limited Partnership. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for New Columbia Trouton Limited Partnership.

Other Information CHAP received October 2016

**Development # 30**

<b>Development Name</b>	<b>New Columbia Woolsey Limited Partnership</b>			
<b>PIC Development ID #</b>	<b>OR002000325</b>			
Conversion Type	Project-Based Vouchers			
Total Current ACC Units	71	Total Post-RAD ACC Units	71	
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family	
Capital Fund Allocation	\$83,745.00			
Transfer of Assistance	None			
Pre-Conversion Bedroom Type	6 1-bedroom units	Post-Conversion Bedroom Type	6 1-bedroom units	
	16 1-bedroom accessible units		16 1-bedroom accessible units	
	8 2-bedroom units		8 2-bedroom units	
	8 2-bedroom accessible units		8 2-bedroom accessible units	
	9 3-bedroom units		9 3-bedroom units	
	9 3-bedroom accessible units		9 3-bedroom accessible units	
	8 4-bedroom units		8 4-bedroom units	
	5 4-bedroom accessible units		5 4-bedroom accessible units	
	1 5-bedroom unit		1 5-bedroom unit	
	1 5-bedroom accessible unit		1 5-bedroom accessible unit	
De Minimis Reduction	None			
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for New Columbia Woolsey Limited Partnership will be moved onto a Home Forward project based voucher site-based waiting list for New Columbia Woolsey Limited Partnership. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for New Columbia Woolsey Limited Partnership.			
Other Information	CHAP received October 2016			

Development # 31

<b>Development Name</b>	<b>Stephens Creek Crossing South</b>		
<b>PIC Development ID #</b>	<b>OR002000065</b>		
Conversion Type	Project-Based Vouchers		
Total Current ACC Units	45	Total Post-RAD ACC Units	45
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$55,723.0		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	9 1-bedroom units	Post-Conversion Bedroom Type	9 1-bedroom units
	1 1-bedroom accessible unit		1 1-bedroom accessible unit
	4 2-bedroom units		4 2-bedroom units
	2 2-bedroom accessible units		2 2-bedroom accessible units
	25 3-bedroom units		25 3-bedroom units
	2 3-bedroom accessible units		2 3-bedroom accessible units
	1 4-bedroom unit		1 4-bedroom unit
	1 4-bedroom accessible unit		1 4-bedroom accessible unit
De Minimis Reduction	None		
Transfer of Waiting List	Upon conversion to RAD, applicants on Home Forward's public housing site-based waiting list for New Columbia Woolsey Limited Partnership will be moved onto a Home Forward project based voucher site-based waiting list for New Columbia Woolsey Limited Partnership. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for New Columbia Woolsey Limited Partnership.		
Other Information			

Development # 32

<b>Development Name</b>	<b>Stephens Creek Crossing North</b>		
<b>PIC Development ID #</b>	<b>OR002000066</b>		
Conversion Type	Project-Based Vouchers		
Total Current ACC Units	64	Total Post-RAD ACC Units	64
Pre-RAD Unit Type	Family	Post-RAD Unit Type	Family
Capital Fund Allocation	\$80,566.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	6 1-bedroom units	Post-Conversion Bedroom Type	6 1-bedroom units

	2	1-bedroom accessible units	2	1-bedroom accessible units
	9	2-bedroom units	9	2-bedroom units
	2	2-bedroom accessible units	2	2-bedroom accessible units
	36	3-bedroom units	36	3-bedroom units
	8	3-bedroom accessible units	8	3-bedroom accessible units
	1	4-bedroom unit	1	4-bedroom unit
De Minimis Reduction	None			
Transfer of Waiting List				
Other Information	CHAP received October 2016			

Development # 33

<b>Development Name</b>	<b>Dahlke Manor</b>		
<b>PIC Development ID #</b>	<b>OR002000114</b>		
Conversion Type	Section 18 project based vouchers or RAD project based vouchers		
Total Current Units	115	Total Post-RAD Units	115
Pre-RAD Unit Type	Senior/People with disabilities	Post-RAD Unit Type	Senior/People with disabilities
Capital Fund Allocation	\$168,059.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	115 1-bedroom units	Post-Conversion Bedroom Type	115 1-bedroom units
De Minimis Reduction	None		
Transfer of Waiting List	If converted to RAD, applicants on Home Forward's public housing site-based waiting list for Dahlke Manor will be moved onto a Home Forward project based voucher site-based waiting list for Dahlke Manor. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Dahlke Manor. If approved for Section 18 Home Forward will not pursue RAD conversion for Dahlke Manor.		

Other Information Home Forward applied for Section 18 for Dahlke Manor prior to RAD and is anticipating a decision to be made by HUD. If approved for Section 18 Home Forward will not pursue RAD conversion for Dahlke Manor. CHAP awarded in October 2016.

**Development # 34**

**Development Name** Holgate House  
**PIC Development ID #** OR002000115  
 Conversion Type Section 18 project based vouchers or RAD project based vouchers  
 Total Current Units 80 Total Post-RAD Units 80  
 Pre-RAD Unit Type Senior/People with disabilities Post-RAD Unit Type Senior/People with disabilities  
 Capital Fund Allocation \$117,008.00  
 Transfer of Assistance None  
 Pre-Conversion Bedroom Type 80 1-bedroom units Post-Conversion Bedroom Type 80 1-bedroom units

De Minimis Reduction None  
 Transfer of Waiting List If converted to RAD, applicants on Home Forward's public housing site-based waiting list for Holgate House will be moved onto a Home Forward project based voucher site-based waiting list for Holgate House. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Holgate House. If approved for Section 18 Home Forward will not pursue RAD conversion for Holgate House.

Other Information Home Forward applied for Section 18 for Holgate House prior to RAD and is anticipating a decision to be made by HUD. If approved for Section 18 Home Forward will not pursue RAD conversion for Holgate House. CHAP awarded in October 2016.

**Development # 35**

**Development Name** Schrunk Riverside Tower  
**PIC Development ID #** OR002000117  
 Conversion Type Section 18 project based vouchers or RAD project based vouchers  
 Total Current Units 118 Total Post-RAD Units 118  
 Pre-RAD Unit Type Senior/People with disabilities Post-RAD Unit Type Senior/People with disabilities  
 Capital Fund Allocation \$172,587.00

Transfer of Assistance	None		
Pre-Conversion Bedroom Type	118 1-bedroom units	Post-Conversion Bedroom Type	118 1-bedroom units

De Minimis Reduction	None
Transfer of Waiting List	If converted to RAD, applicants on Home Forward's public housing site-based waiting list for Schrunck Rivertower will be moved onto a Home Forward project based voucher site-based waiting list for Schrunck Rivertower. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV site-based waiting list for Schrunck Rivertower. If approved for Section 18 Home Forward will not pursue RAD conversion for Schrunck Rivertower.
Other Information	Home Forward applied for Section 18 for Schrunck Rivertower prior to RAD and is anticipating a decision to be made by HUD. If approved for Section 18 Home Forward will not pursue RAD conversion for Schrunck Rivertower. CHAP awarded in October 2016.

**Development # 36**

<b>Development Name</b>	<b>Williams Plaza</b>		
<b>PIC Development ID #</b>	<b>OR002000118</b>		
Conversion Type	Section 18 project based vouchers or RAD project based vouchers		
Total Current Units	101	Total Post-RAD Units	101
Pre-RAD Unit Type	Senior/People with disabilities	Post-RAD Unit Type	Senior/People with disabilities
Capital Fund Allocation	\$134,561.00		
Transfer of Assistance	None		
Pre-Conversion Bedroom Type	67 studio units	Post-Conversion Bedroom Type	67 studio units
	29 1-bedroom units		29 1-bedroom units
	5 1-bedroom accessible units		5 1-bedroom accessible units
De Minimis Reduction	None		
Transfer of Waiting List	If converted to RAD, applicants on Home Forward's public housing site-based waiting list for Williams Plaza will be moved onto a Home Forward project based voucher site-based waiting list for Williams Plaza. The applicants will retain their original date and time of application, and will be subject to the preferences available		

under the PBV site-based waiting list for Williams Plaza. If approved for Section 18 Home Forward will not pursue RAD conversion for Williams Plaza.

Other Information Home Forward applied for Section 18 for Williams Plaza prior to RAD and is anticipating a decision to be made by HUD. If approved for Section 18 Home Forward will not pursue RAD conversion for Williams Plaza. CHAP awarded in October 2016.

**Changes in policies that govern eligibility, admission, selection, and occupancy of units at the project after conversion, including any waiting list preferences that will be adopted for the converted project:**

Home Forward presented to the Board of Commissioners requested changes to the Section 8 Administrative Plan to accommodate the RAD transition. This request was approved by the Board of Commissioners on April 19, 2016. The changes include adopting guidelines for choice mobility. At the time of this writing, Home Forward is continuing to review RAD requirements and may submit additional changes to the Section 8 Administrative Plan and the Admissions and Continued Occupancy Policy (ACOP) for public housing. All policy changes adhere to RAD requirements listed below under Appendix A, that informs resident rights, participation, waiting list and grievance procedures.

**Compliance agreements:** Home Forward is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

**Site selection:** This conversion complies with all applicable site selection and neighborhood reviews standards. All appropriate procedures have been followed.

**Substantial Deviation Definition:** As part of the Rental Assistance Demonstration (RAD), Home Forward is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD specific items:

1. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
2. Changes to the Capital Fund Budget produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
3. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
4. Changes to the financing structure for each approved RAD conversion.

**Information regarding use of MTW Fungibility as defined in PIH Notice 2012-32, REV-2:**

**Impact on Capital Fund:**

1. **Estimate the amount of the current Capital Fund grant that is associated with the proposed projects and the impact on the PHA's current Five-Year PHA Plan and Five-Year Capital Action Plan:** The current impact associated with the six CHAPS in this application is \$160,000. \$20,000 has been set aside for each CHAP and another \$40,000 set aside for Sequoia Square and Schiller Way, the two properties that will receive units for transfer of assistance (upon approval from HUD) from Rockwood Station and Fairview Oaks & Woods.
2. **If the RAD conversion will impact an existing CFFP or EPC, or if it proposes to utilize RHF funds to facilitate conversion, the PHA should also indicate the estimated impact of those activities:** Home Forward has submitted 31 additional RAD applications that total 1,008 public housing units. These additional applications are on the RAD waitlist and if approved, will impact our formula Capital Fund Grant allocation by approximately 56% of our current public housing unit count. We will not utilize RHF funds to facilitate conversion.

**Special Provisions Affecting MTW Agencies:** MTW agencies will be able to apply activities impacting the PBV program that are approved in its MTW Plan to those properties as long as they do not conflict with RAD requirements. RAD requirements include statutory requirements or specifically identified special provisions affecting conversions to PBVs, or other conditions and requirements, as detailed in PIH Notice 2012-32 REV-1, including, but not limited to, RAD contract forms or Riders. With respect to any existing PBV regulations that are waived or modified below in Appendix A, except where explicitly noted below in Appendix A, MTW agencies may modify these or other requirements to the PBV program if the activity is approved in its MTW Plan. All other RAD Requirements listed below in Appendix A or elsewhere in PIH Notice 2012-32 REV-1 shall apply to MTW agencies.

## APPENDIX A: RESIDENT RIGHTS, PARTICIPATION, WAITING LIST AND GRIEVANCE PROCEDURES

### Section 1.6 – Special Provisions Affecting Conversions to Project-Based Vouchers from PIH Notice 2012-32, REV-1

#### C. PBV Resident Rights and Participation.

**1. No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households.<sup>1</sup> Once that remaining household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement.

**2. Right to Return.** See section 1.4.A.4(b) regarding a resident's right to return.

**3. Renewal of Lease.** Since publication of the PIH Notice 2012-32 Rev 1, the regulations under 24 CFR § 983.257(b)(3) have been amended requiring Project Owners to renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.

**4. Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent.

This policy must be in place at conversion and may not be modified after conversion. The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "standard TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

---

<sup>1</sup> These protections (as well as all protections in this Notice for current households) apply when in order to facilitate repairs a household is relocated following the conversion and subsequently returns to the property, even if they are considered a "new admission" upon return.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the standard TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

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 standard TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP
- Year 5 AR and all subsequent recertifications – Full standard TTP

*Please Note:* In either the three-year phase-in or the five-year phase-in, once the standard 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 may not alter this requirement.

**5. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are current FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any remaining PH FSS funds, to serve those FSS participants who live in units converted by RAD. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the FY15 Appropriations Act), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g. escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.<sup>1</sup> Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

---

<sup>1</sup> The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents.

**6. Resident Participation and Funding.** In accordance with Attachment 1B, residents of Covered Projects with converted PBV assistance will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

**7. Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

**i. Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:

- a. A reasonable period of time, but not to exceed 30 days:
  - i. If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
  - ii. In the event of any drug-related or violent criminal activity or any felony conviction;
- b. 14 days in the case of nonpayment of rent; and
- c. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

**ii. Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional procedural rights to comply with section 6 of the Act.

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

---

**Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.**

- a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi),<sup>1</sup> an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
  - i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
  - ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.
- b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
- c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- d. The Project Owner provides opportunity for an informal hearing before an eviction.

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

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

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 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 who at one time received the EID but are not receiving the EID exclusion at the time of conversion e.g., due to loss of employment; tenants that move into the property following conversion, etc.) is covered by this waiver.

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

---

<sup>1</sup> § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate has been repealed.

**10. When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may only select an occupied unit to be included under the PBV HAP contract if the unit's occupants are eligible for housing assistance payments (24 CFR §983.53(d)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR §983.258). Since the rent limitation under this Section of the Notice may often result in a family's TTP equaling or exceeding the gross rent for the unit, for current residents (i.e. residents living in the public housing property prior to conversion), HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP contract when TTP equals or exceeds than the Gross Rent. Further, HUD is establishing the alternative requirement that the rent to owner for the unit equal the family's TTP until such time that the family is eligible for a housing assistance payment. HUD is waiving as necessary to implement this alternative provision, the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR 983.301 as modified by Section 1.6.B.5 of this Notice.<sup>1</sup> In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP contract. Assistance may subsequently be reinstated if the tenant becomes eligible for assistance. The PHA is required to process these individuals through the Form- 50058 submodule in PIC.

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

**11. Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR 983.259 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 983.259 is waived. MTW agencies may not modify this requirement.

#### **D. PBV: Other Miscellaneous Provisions**

---

<sup>1</sup> For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

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

**2. Additional Monitoring Requirement.** The PHA's Board must approve the operating budget for the covered project annually in accordance with HUD requirements.<sup>1</sup>

**3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** This section has been moved to 1.4.A.13 and 1.4.A.14.

**4. Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:

- i. Transferring an existing site-based waiting list to a new site-based waiting list. If the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list.
- ii. Informing applicants on the site-based waiting list on how to apply for a PBV program-wide or HCV program-wide waiting list.
- iii. Informing applicants on a public housing community-wide waiting list on how to apply for a voucher-wide, PBV program-wide, or site-based waiting list. 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 converted project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's public housing community-wide waiting list who wish to be placed onto the newly-established site-based waiting list must be done so in accordance with the date and time of their original application to the centralized public

---

<sup>1</sup> 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 the evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).<sup>1</sup>

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies.

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

**5. Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.

**6. Agreement Waiver.** This section has been moved to 1.6.(B)(7).

**7. Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of permanent debt during the HAP contract term, to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

**8. Administrative Fees for Public Housing Conversions during Transition Period.** For the remainder of the Calendar Year in which the HAP Contract is effective (i.e. "transition period"), 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 Annual Contributions Contract (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 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.

For fiscal years 2014 and 2015, PHAs operating HCV program received 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

---

<sup>1</sup> For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

before the Quality Housing and Responsibility Act of 1998" and 24 CFR § 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the section 8 ACC will be amended to include section 8 funding that corresponds to the units covered by the section 8 ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

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

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

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

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

**10. Reserve for Replacement.** The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account covered under a General Depository Agreement (HUD-51999) or similar instrument, as approved by HUD, where funds will be held by the

## Attachment 1B: Resident Provisions in Conversions of Assistance from Public Housing to PBRA and PBV

This Attachment contains two sections, describing:

1B.1 Summary of Resident Provisions

1B.2 Resident Participation and Funding

### 1B.1 Summary of Resident Provisions

The following is a summary of special provisions and alternative requirements related to tenants of public housing projects converting under RAD:

- Conversion will be considered a significant amendment to a PHA Plan (see Section 1.5(E) of this Notice);
- Notification of proposed conversion, meetings during the conversion process, written response to residents comments on conversion, and notification of conversion approval and impact (see Section 1.8 of this Notice);
- No rescreening at conversion (see Section 1.6(C)(1) of this Notice for conversions to PBV and Section 1.7(B)(1) for conversions to PBRA);
- Right to return after temporary relocation to facilitate rehabilitation or construction (see Section 1.6(C)(2) of this Notice for conversions to PBV and Section 1.7(B)(2) for conversions to PBRA);
- Phase-in of tenant rent increases (see Section 1.6(C)(4) of this Notice for conversions to PBV and Section 1.7(B)(3) for conversions to PBRA);
- Continued participation in the ROSS-SC and FSS programs (see Section 1.6(C)(5) of this Notice, for conversions to PBV and Section 1.7(B)(4) for conversions to PBRA);
- Continued Earned Income Disregard (see Section 1.6(C)(8) of this Notice, for conversions to PBV and Section 1.7.(B)(7) for conversions to PBRA);
- Continued recognition of and funding for legitimate residents organizations (see Section 1.6(C)(6) of this Notice for conversions to PBV, Section 1.7(B)(5) of this Notice for conversions to PBRA, and below in Attachment 1B.2 for additional requirements for both programs);
- Procedural rights consistent with section 6 of the Act (see Section 1.6(C)(7) of this Notice for conversions to PBV and Section 1.7(B)(6) of this Notice for conversions to PBRA); and
- Choice-mobility option allowing a resident to move with a tenant-based voucher after tenancy in the Covered Project (see 24 CFR § 983.260 for conversions to PBV and Section 1.7(C)(5) of this Notice for conversions to PBRA).
- For additional information, refer to Notice H2014-09; PIH 2014-17 for additional information on relocation requirements under RAD.

### 1B.2 Resident Participation and Funding<sup>1</sup>

The following provisions contain the resident participation and funding requirements for public housing conversions to PBRA and PBV, respectively.

---

<sup>1</sup> For the purposes of this Attachment, HUD uses the term “Project Owner” to refer to the owner of a converting or Covered Project. In some instances the owner of a project could be a public, non-profit, or for-profit, e.g., mixed finance projects).

### **A. PBRA: Resident Participation and Funding**

Residents of Covered Projects converting assistance to PBRA will have the right to establish and operate a resident organization in accordance with 24 CFR Part 245 (Tenant Participation in Multifamily Housing Projects). In addition, a Project Owner must provide \$25 per occupied unit annually for resident participation, of which at least \$15 per occupied unit shall be provided to the legitimate tenant organization at the covered property. These funds must be used for resident education, organizing around tenancy issues, and training activities.

In the absence of a legitimate resident organization at a Covered Project:

1. HUD encourages the Project Owner and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate residents organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owners are also encouraged to actively engage residents in the absence of a resident organization; and
2. Project Owners must make resident participation funds available to residents for organizing activities in accordance with this Notice. Residents must make requests for these funds in writing to the Project Owner. These requests will be subject to approval by the Project Owner.

### **B. PBV: Resident Participation and Funding**

To support resident participation following conversion of assistance, residents of Covered Projects converting assistance to the PBV program will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment, which includes the terms and conditions of their tenancy as well as activities related to housing and community development.

1. **Legitimate Resident Organization.** A Project Owner must recognize legitimate resident organizations and give reasonable consideration to concerns raised by legitimate resident organizations. A resident organization is legitimate if it has been established by the residents of a Covered Project, meets regularly, operates democratically, is representative of all residents in the project, and is completely independent of the Project Owner, management, and their representatives.

In the absence of a legitimate resident organization at a Covered Project, HUD encourages the Project Owner and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate residents organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owners are also encouraged to actively engage residents in the absence of a resident organization; and

2. **Protected Activities.** Project Owners must allow residents and resident organizers to conduct the following activities related to the establishment or operation of a resident organization:
  - a. Distributing leaflets in lobby areas;
  - b. Placing leaflets at or under residents' doors;

- c. Distributing leaflets in common areas;
- d. Initiating contact with residents;
- e. Conducting door-to-door surveys of residents to ascertain interest in establishing a resident organization and to offer information about resident organizations;
- f. Posting information on bulletin boards;
- g. Assisting resident to participate in resident organization activities;
- h. Convening regularly scheduled resident organization meetings in a space on site and accessible to residents, in a manner that is fully independent of management representatives. In order to preserve the independence of resident organizations, management representatives may not attend such meetings unless invited by the resident organization to specific meetings to discuss a specific issue or issues; and
- i. Formulating responses to Project Owner's requests for:
  - i. Rent increases;
  - ii. Partial payment of claims;
  - iii. The conversion from project-based paid utilities to resident-paid utilities;
  - iv. A reduction in resident utility allowances;
  - v. Converting residential units to non-residential use, cooperative housing, or condominiums;
  - vi. Major capital additions; and
  - vii. Prepayment of loans.

In addition to these activities, Project Owners must allow residents and resident organizers to conduct other reasonable activities related to the establishment or operation of a resident organization.

Project Owners shall not require residents and resident organizers to obtain prior permission before engaging in the activities permitted in this section.

**3. Meeting Space.** Project Owners must reasonably make available the use of any community room or other available space appropriate for meetings that is part of the multifamily housing project when requested by:

- a. Residents or a resident organization and used for activities related to the operation of the resident organization; or
- b. Residents seeking to establish a resident organization or collectively address issues related to their living environment.

Resident and resident organization meetings must be accessible to persons with disabilities, unless this is impractical for reasons beyond the organization's control. If the project has an accessible common area or areas, it will not be impractical to make organizational meetings accessible to persons with disabilities.

Project Owners may charge a reasonable, customary and usual fee, approved by the Secretary as may normally be imposed for the use of such facilities in accordance with procedures prescribed by the Secretary, for the use of meeting space. A PHA may waive this fee.

- 4. Resident Organizers.** A resident organizer is a resident or non-resident who assists residents in establishing and operating a resident organization, and who is not an employee or representative of current or prospective Project Owners, managers, or their agents.

Project Owners must allow resident organizers to assist residents in establishing and operating resident organizations.

- 5. Canvassing.** If a Covered Project has a consistently enforced, written policy against canvassing, then a non-resident resident organizer must be accompanied by a resident while on the property of the project.

If a project has a written policy favoring canvassing, any non-resident resident organizer must be afforded the same privileges and rights of access as other uninvited outside parties in the normal course of operations. If the project does not have a consistently enforced, written policy against canvassing, the project shall be treated as if it has a policy favoring canvassing.

A resident has the right not to be re-canvassed against his or her wishes regarding participation in a resident organization.

- 6. Funding.** Project Owners must provide \$25 per occupied unit annually for resident participation, of which at least \$15 per occupied unit shall be provided to the legitimate resident organization at the covered property. These funds must be used for resident education, organizing around tenancy issues, and training activities.

In the absence of a legitimate resident organization at a Covered Project:

- a. HUD encourages the Project Owners and residents to work together to determine the most appropriate ways to foster a constructive working relationship, including supporting the formation of a legitimate residents organization. Residents are encouraged to contact the Project Owner directly with questions or concerns regarding issues related to their tenancy. Project Owners are also encouraged to actively engage residents in the absence of a resident organization; and
- b. Project Owners must make resident participation funds available to residents for organizing activities in accordance with this Notice. Residents must make requests for these funds in writing to the Project Owner. These requests will be subject to approval by the Project Owner.

This page is intentionally blank.

RELOCATION REQUIREMENT UNDER THE RENTAL ASSISTANCE DEMONSTRATION (RAD) PROGRAM, PUBLIC HOUSING IN THE FIRST COMPONENT NOTICE H 2014-09/PIH 2014-17



**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, DC 20410-8000

ASSISTANT SECRETARY FOR HOUSING- FEDERAL HOUSING COMMISSIONER

---

**Special Attention of:**

Public Housing Agencies  
Public Housing Hub Office Directors  
Public Housing Program Center Directors  
Regional Directors  
Field Office Directors

**Notice H 2014-09**  
PIH 2014-17

Issued: July 14, 2014

This notice remains in effect until amended, RAD Transaction Managers superseded, or rescinded.

Cross Reference: PIH Notice 2012-32 (HA) REV 1

---

**Subject: Relocation Requirements under the Rental Assistance Demonstration (RAD) Program, Public Housing in the First Component**

**1. Purpose**

This Notice provides public housing agencies (PHAs)<sup>1</sup> and their partners with information and resources on applicable program and relocation assistance requirements when planning for or implementing resident moves as a result of a **Rental Assistance Demonstration (RAD)** conversion<sup>2</sup> under the first component of the demonstration.<sup>3</sup> This Notice provides guidance on RAD relocation requirements and requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA), as they relate to the public housing conversion process under the first component.<sup>4</sup>

---

<sup>1</sup> This Notice always uses the term “PHA” to refer to the owner of the project prior to and after the RAD conversion, even though, in some cases, the owner of the converted RAD project may be another public entity, a non-profit organization, or other owner (e.g., low-income housing tax credit owner). In addition, this Notice uses “PHA” to refer to the “displacing agency,” a URA term that means 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, may require substituting in a reference to a party that is more appropriate for a specific project.

<sup>2</sup> 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.

<sup>3</sup> The “first component” of RAD allows public housing and Moderate Rehabilitation properties to convert assistance; the “second component” refers to conversion of Rent Supplement, Rental Assistance Payment, and Moderate Rehabilitation properties upon contract expiration or termination.

<sup>4</sup> Relocation concerns and URA requirements apply to both components of RAD. This notice provides guidance only as to the first component.

[www.hud.gov](http://www.hud.gov) [espanol.hud.gov](http://espanol.hud.gov)

Relocation assistance provided pursuant to public housing and RAD requirements is broader than URA relocation assistance requirements. Not all specific situations requiring relocation under RAD may trigger URA assistance requirements. In addition, whereas all qualifying residents<sup>5</sup> of a converting public housing project are eligible for relocation assistance under RAD, some residents or household members may not meet the statutory and regulatory requirements for eligibility under URA. This Notice supersedes PIH Notice 2012-32 (HA), REV-1, with respect to relocation matters. This Notice also specifically addresses when relocation may begin (see Section 9 below). As necessary, the Department will issue additional guidance on relocation issues and requirements as they relate to RAD.

## **2. Background**

RAD allows public housing properties to convert assistance to long-term project-based Section 8 contracts. In many cases, a RAD project may require relocation of residents when properties undergo repairs, are demolished and rebuilt, or when the assistance is transferred to another site. PIH Notice 2012-32 REV-1 (see also FR Notice 5630-N-05, 78 FR 39759-39763 (July 2, 2013)) details RAD program requirements.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA) is a federal law that establishes minimum standards for federally-funded programs and projects 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 of real property.<sup>6</sup> The URA will apply to acquisitions of real property and relocation of persons from real property that occurs as a direct result of acquisition, rehabilitation, or demolition for a project that involves conversion of assistance to Project-Based Voucher (PBV) or Project-Based Rental Assistance (PBRA) programs under RAD.

Additionally, all relocation conducted as part of a RAD conversion and all relocation assistance provided under URA must be consistent with applicable fair housing and civil rights laws, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973.

Because each RAD proposal varies in its scope, this Notice may not address each PHA's specific circumstances. RAD PHAs and participants should carefully review the regulations, notices, and guidance material referenced in this Notice. Any questions related to the applicability of these requirements should be referred to the RAD Transaction Managers (TM) or may be emailed to [rad@hud.gov](mailto:rad@hud.gov).

## **3. Applicable Legal Authorities**

---

<sup>5</sup> The term "resident" as used in this Notice refers to eligible resident families of public housing residing in a property applying for participation in RAD or a property that undergoes a conversion of assistance through RAD.

<sup>6</sup> HUD Handbook 1378 (Tenant Assistance, Relocation, and Real Property Acquisition), available at: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/comm\\_planning/library/relocation/policyandguidance/handbook1378](http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/library/relocation/policyandguidance/handbook1378).

- RAD: Consolidated and Further Continuing Appropriations Act of 2012 (Public Law 112-55, approved November 18, 2011), with the implementing PIH Notice 2012-32, REV-1
- URA statute and implementing regulations: 49 CFR part 24
- FHEO: Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Fair Housing Act
- Section 104(d) of the Housing and Community Development Act of 1974, statute and implementing regulations (if CDBG and/or HOME funds are used): 24 CFR part 42, subpart C

#### 4. Relocation Planning

If there is a possibility that residents will be relocated as a result of acquisition, demolition, or rehabilitation for a project converting under RAD, PHAs must undertake a planning process in conformance with URA in order to minimize the adverse impact of relocation (49 CFR 24.205(a)).

While a written Relocation Plan is not a requirement under RAD or URA, the Department strongly encourages PHAs to prepare a written Relocation Plan, both to establish their relocation process and to communicate this process consistently and effectively to all relevant stakeholders. Appendix 1 contains recommended elements of a Relocation Plan.

The following presents a general sequencing of relocation planning activities within the RAD milestones:

Stage	Activities
1. Prior to submission of RAD application	<ul style="list-style-type: none"> <li>• Determine potential need for relocation</li> <li>• Meet with residents to discuss plans, communicate right to return, and solicit feedback</li> <li>• Provide <i>General Information Notice</i> (GIN) to residents</li> <li>• Survey residents to prepare Relocation Plan and relocation process cost estimate</li> </ul>
2. After receipt of the Commitment to Enter into a HAP Contract (CHAP) Award	<ul style="list-style-type: none"> <li>• Prepare Significant Amendment to PHA Plan</li> <li>• Assess and refine need for relocation</li> <li>• Develop a Relocation Plan (See Appendix 1 for recommended content)</li> <li>• Identify relocation housing options</li> </ul>
3. Preparing Financing Plan (due to RAD Transaction Manager no later than 180 days following	<ul style="list-style-type: none"> <li>• Budget for relocation expenses</li> <li>• Submit FHEO Accessibility &amp; Relocation checklist (PHAs may submit Relocation Plan along with checklist)</li> </ul>

Stage	Activities
CHAP award)	
4. Receipt of RAD Conversion Commitment (RCC)	<ul style="list-style-type: none"> <li>• The date of issuance of the HUD RCC marks the date of “Initiation of Negotiations” (ION), as defined in the URA (49 CFR 24.2(a)(15))</li> <li>• Provide residents with appropriate notice informing them if they will be relocated and any associated relocation assistance</li> <li>• Meet with residents to describe approved conversion plans and discuss required relocation</li> </ul>
5. Closing/RAD conversion	<ul style="list-style-type: none"> <li>• Generally, resident relocation should not begin until after the date of closing/conversion of assistance under RAD</li> <li>• PHAs must adhere to notification requirements (described in Paragraph 8 of this Notice): generally, a minimum of 30 days for residents to be temporarily relocated for up to a year, and 90 days for permanent relocation</li> <li>• PHAs seeking to move residents prior to closing must receive prior approval from HUD as described in Paragraph 9 of this Notice</li> </ul>

## 5. Resident Right to Return

RAD program rules prohibit the permanent involuntary relocation of residents as a result of conversion. Residents that are temporarily relocated retain the right to return to the project once it has been completed and is in decent, safe, and sanitary conditions.<sup>7</sup> The period during which residents may need to be temporarily relocated is determined by the period of rehabilitation or construction, which will be specific to each project.

If proposed plans for a project would preclude a resident from returning to the RAD project, the resident must be given an opportunity to comment and/or object to such plans. If the resident objects to such plans, the PHA must alter the project plans to accommodate the resident in the converted project. If a resident agrees to such plans, the PHA must secure informed, written consent from the resident to receive permanent relocation assistance and payments consistent with URA and acknowledge that acceptance of such assistance terminates the resident’s right to return to the project. In obtaining this consent, PHAs must inform residents of their right to return, potential relocation, and temporary and permanent housing options at least 30 days before residents must make a decision. The PHA cannot employ any tactics to pressure residents into

---

<sup>7</sup> Where the transfer of assistance to a new site is approved, residents of the converting project will have the right to reside in an assisted unit at the new site once rehabilitation or new construction is complete.

relinquishing their right to return or accepting permanent relocation assistance and payments.<sup>8</sup> A PHA may not terminate a resident's lease if it fails to obtain this consent.

PHAs must keep documentation of such information provided to residents and such consent by residents. While HUD does not require PHAs to submit documentation of obtaining this consent, PHAs and participants must properly brief residents on their housing and relocation options and must keep auditable written records of such consultation and decisions. HUD may request this documentation during a review of the FHEO Relocation and Accessibility Checklist or if relocation concerns arise.

Examples of project plans that may preclude a resident from returning to the converted RAD project include, but are not limited to:

- Changes in bedroom distribution (i.e. when larger units will be replaced with smaller units such that current residents would become under-housed or when smaller units will be replaced with larger units such that current residents would become over-housed);
- Where a PHA is reducing the number of assisted units at a property by a de minimis amount<sup>9</sup>, but those units are occupied by assisted residents; or
- The reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to facilitate social service delivery.

In all scenarios where residents voluntarily accept permanent relocation to accommodate project plans, these residents are eligible for permanent relocation assistance and payments under URA. If a resident accepts permanent relocation assistance, the resident surrenders his or her right to return to the completed project.

## **6. Relocation Assistance**

Under RAD, relocation assistance may vary depending on the length of time relocation is required.<sup>10</sup>

a. In instances when the PHA anticipates that a resident will be relocated for more than a year, the PHA must offer the resident the choice of:

- Permanent relocation assistance and payments at URA levels; or
- Temporary relocation assistance, including temporary housing, while the resident retains his or her right to return and reimbursement for all reasonable out-of-pocket expenses associated with the temporary relocation.

---

<sup>8</sup> Persons with disabilities returning to the RAD project may not be turned away or placed on a waiting list due to a lack of accessible units. Their accessibility needs must be accommodated.

<sup>9</sup> A reduction in total number of assisted units at RAD project of 5% or less. (Section 1.5.B of PIH 2012-32 REV-1)

<sup>10</sup> Some residents may not qualify for relocation assistance under URA. A nonexclusive listing of persons who do not qualify as displaced persons under URA is at 49 CFR 24.2(a)(9)(ii). See also, Paragraph 1-4(J) of HUD Handbook 1378.

temporary relocation assistance. If the resident elects to permanently relocate with assistance at URA levels, the PHA must inform the resident that his or her acceptance of permanent relocation assistance terminates the resident's right to return to the completed RAD project.

- b. In instances when a resident elects temporary relocation assistance and reoccupies a unit in the completed project within one year, the resident need not be offered permanent relocation assistance pursuant to URA.

Great care must be exercised to ensure that residents are treated fairly and equitably. If a resident is required to relocate temporarily in connection with the project, his or her 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 and increased housing costs during the temporary relocation.

- c. In the event that a resident elects to receive temporary relocation assistance and the temporary relocation exceeds one year, the resident becomes eligible for all permanent relocation assistance and payments under URA. (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 shall give the resident the opportunity to choose to remain temporarily relocated for an agreed-to period (based on new information about when they can return to the completed RAD unit), or choose to permanently relocate with URA assistance.

PHAs may not propose or request that a displaced person waive rights or entitlements to relocation assistance under the URA. If the resident elects to permanently relocate with URA assistance, the PHA must inform the person that the person's acceptance of URA relocation assistance to permanently relocate will terminate the person's right to return to the completed RAD project. Conversely, unless and until the resident elects to be permanently relocated, the resident may remain temporarily relocated with a right to return to the completed project.

## **7. Initiation of Negotiations (ION) Date**

Eligibility for URA relocation assistance is generally effective on the date of initiation of negotiations (ION) (49 CFR 24.2(a)(15)). For RAD projects, the ION date is the date of the issuance of the RAD Conversion Commitment (RCC).

## **8. Resident Notification**

When a project converting under RAD will include relocation of residents, notice must be provided to those resident households. For each notice listed below, one notice shall be given to each resident household. The purpose of these notifications is to ensure that residents are

**informed of their potential rights and the relocation assistance available to them. During initial** meetings with residents about RAD and in subsequent communications with residents related to relocation, the PHA should inform residents that if they choose to move after receiving a written GIN, but prior to receiving a RAD Notice of Relocation, they may jeopardize their eligibility for relocation assistance. However, PHAs should note that a resident move undertaken as a direct result of the project may still require relocation assistance and the resident may be eligible to receive permanent relocation assistance under the URA even though the PHA has not yet issued notices.

a. *General Information Notice* (49 CFR 24.203(a) & Handbook 1378, Paragraph 2-3(B))

As soon as feasible in the planning process, the PHA must provide each resident with a written GIN (see sample in Appendix 2) to provide a general description of the project, the activities planned, and the relocation assistance that may become available. URA regulations state that the GIN should be provided *as soon as feasible*. Under RAD, PHAs must provide GINs during the initial RAD resident meetings, before submitting a RAD application. GINs 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 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 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 at least 90 days advance written notice, and inform any person to be displaced from a dwelling that 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 CFR 24.208(h) for additional information); and
- Describe the resident's right to appeal the PHA's determination as to a person's eligibility for URA assistance.

b. *RAD Notice of Relocation*

If a resident will be relocated to facilitate the RAD conversion, the PHA shall provide notice of such relocation (RAD Notice of Relocation). The PHA shall issue this notice upon the PHA's receipt of the RCC from HUD, which is the ION date.

If residents will not be relocated, notice of relocation is not required, but the PHA should

notify them that they are not being relocated.<sup>11</sup>

The RAD Notice of Relocation must conform to the following requirements:

- The notice must state the anticipated duration of the resident's relocation.
- PHAs must provide this notice a minimum of 30 days prior to relocation to residents who will be temporarily relocated.<sup>12</sup> Longer notice may be appropriate for persons who will be relocated for an extended period of time (over 6 months), or if necessary due to personal needs or circumstances.
- Residents whose temporary relocation is anticipated to exceed one year must be informed that they will have no less than 30 days to elect temporary or permanent relocation as described in Section 6 of this Notice. When timing is critical for project completion, the 30-day decision period can run concurrently with the 30-day notice period for temporary relocation and with the 90-day period for permanent relocation if the PHA makes available comparable replacement dwellings consistent with 24.204(a).
- Residents who will be permanently relocated must receive written notice a minimum of 90 days prior to relocation. This 90-day time period may only begin once the PHA has made available at least one comparable replacement dwelling consistent with 49 CFR 24.204(a).<sup>13</sup>
- The notice must describe the available relocation assistance, the estimated amount of assistance based on the individual circumstances and needs, and the procedures for obtaining the assistance. The notice must be specific to the resident and his or her situation so that the resident will have a clear understanding of the type and amount of payments and/or other assistance the resident household may be entitled to claim.
- The notice must explain the reasonable terms and conditions under which the resident may continue to lease and occupy a unit in the completed project.
- The notice must state that the PHA will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with any temporary move. These expenses include, but are not limited to, moving expenses and increased housing costs (rent, utilities, etc.).

*c. Notice of Intent to Acquire (49 CFR 24.203(d))*

---

<sup>11</sup> HUD policy generally requires a "notice of non-displacement" in certain instances; the RAD program does not require this notice. Although the scope of this notice is limited to guidance for projects requiring relocation, PHAs should note, however, that there may be notification requirements for projects that do not involve relocation. The RAD conversion will terminate the resident's public housing lease and commence a PBV or PBRA lease, even when there is no relocation required. In such instances, state law may impose certain notification requirements. In addition, public housing regulations generally require 30 days' notice prior to lease termination. PHAs are encouraged to review public housing requirements set forth in 24 CFR parts 5 and 966.

<sup>12</sup> HUD may approve shorter notice periods based on an urgent need due to danger, health, or safety issues or if the person will be temporarily relocated for only a short period.

<sup>13</sup> PHAs should note that URA regulations also require, where possible, that three or more comparable replacement dwellings be made available before a resident is required to move from his or her unit.

For RAD projects involving acquisition, residents may be provided with a notice of intent to acquire (“*Notice of Intent to Acquire*”) prior to the ION date with HUD’s prior approval. Once the Notice of Intent to Acquire is provided, a resident’s eligibility for relocation assistance and payments is established. Therefore, the RAD Notice of Relocation must be provided in conjunction with or after the Notice of Intent to Acquire. A RAD Notice of Relocation would not otherwise be sent prior to the ION date.

Since residents who accept permanent relocation must receive 90 days advanced written notice prior to being required to move, providing residents the Notice of Intent to Acquire and RAD Notice of Relocation prior to the ION date may be necessary to provide sufficient notice of relocation to a resident in instances where there may not be 90 days between the issuance of the RCC (ION date) and the anticipated closing date. This allows the PHA to issue the notice earlier so that relocation may begin upon closing. This allows program participants to conduct orderly relocation upon closing, minimize adverse impacts on displaced persons, and to expedite project advancement and completion.<sup>14</sup>

- d. *URA Notice of Relocation Eligibility* – for residents whose temporary relocation exceeds one year (49 CFR 24.203(b) & Handbook 1378, Paragraph 2-3(C))

After a resident has been temporarily relocated for one year, the PHA must provide a notice of relocation eligibility in accordance with URA requirements (“*Notice of Relocation Eligibility*”). This notice is not required if the resident has already accepted permanent relocation assistance.

The Notice of Relocation Eligibility must conform to URA requirements as set forth in 49 CFR Part 24, to HUD Handbook 1378 and to the following requirements:

- The PHA must provide updated information as to when it is anticipated that the resident will be able to return to the completed project.
- The resident may choose to remain temporarily relocated based upon such updated information or may choose to accept permanent URA relocation assistance in lieu of exercising the right to return.
- If the resident chooses to accept permanent URA relocation assistance and such assistance requires that the resident move, the URA requires such resident to receive 90 days advance written notice of the earliest date they will be required to move (i.e., 90-Day Notice, 49 CFR 24.203(c)). The PHA should be mindful that the 90-day time period may only begin once the PHA has made available at least one “comparable replacement dwellings” as set forth in 49 CFR 24.204(a).

## 9. Initiation of Relocation

---

<sup>14</sup> PHAs and program participants should note that, in most instances, it will be most appropriate for the acquiring entity to send this notice.

Unless otherwise approved by HUD, relocation may not begin until the date of closing of the RAD transaction and recordation of the RAD Use Agreement. PHAs must provide residents being temporarily relocated at least 30 days advance written notice of the required move. PHAs must give residents being permanently relocated at least 90 days advance written notice of the required move. This means PHAs are advised to plan carefully to account for this 30-day or 90-day notice period to ensure the closing is not delayed.

However, HUD is aware that, in rare cases, some project plans necessitate relocation prior to closing. With prior HUD approval, for projects involving acquisition, PHAs may relocate residents prior to the closing date subject to public housing requirements (see 24 CFR part 5 and 24 CFR 966). PHAs must contact their assigned RAD transaction manager (TM) to discuss plans as early as possible in the process to ensure compliance with all RAD and URA requirements.

If relocation prior to closing is desired, PHAs should submit to the TM the following information, as early as possible in the process:

- A written request for relocation prior to closing. The request must include justification of why the early relocation is necessary for the viability of the RAD transaction. Justification may include the presence of outside financing, such as Low Income Housing Tax Credit (LIHTC) awards, if the PHA can show that early relocation is necessary to meet critical LIHTC deadlines.
- FHEO Accessibility and Relocation Checklist.
- Evidence of intent to comply with public housing requirements, as applicable. Generally, public housing regulations require public housing residents to receive 30 days' notice prior to relocation and that such notice either be published in the PHA's admissions and continued occupancy policies (ACOP) or published elsewhere at least 30 days prior to receipt of such notice (24 CFR parts 5 and 966).

When seeking to relocate residents prior to closing, submission of this request as early as possible is preferred, prior to the 180-day Financing Plan milestone if possible (with Financing Plan submission following the request).

HUD reserves the right to request additional follow-up information, including a Relocation Plan and related budget, prior to approving such requests. PHAs must receive written HUD approval before beginning relocation of residents prior to closing.

Early planning and submission of the Financing Plan and FHEO checklist to HUD will ensure the PHA has built in the 30- or 90-day notice period prior to initiating relocation.

## **10. Fair Housing and Civil Rights Requirements**

PHAs must comply with all applicable fair housing and civil rights laws, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973, when conducting relocation planning and providing relocation assistance. Further, communication must be provided in a manner that is effective for persons

with disabilities (24 CFR 8.6) and for person who are Limited English Proficient (see 72 FR 2732). This section discusses some of the PHA's obligations under these laws and regulations. However, the applicability of civil rights laws is not limited to the activities discussed in this section. PHAs conducting relocation activities should familiarize themselves with applicable civil rights statutes, regulations, and guidance, including but not limited to, those listed at the end of this section.

- **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 CFR 8.6), and as applicable, the Americans with Disabilities Act; and for persons who are limited English proficient (*see* 72 Fed Reg 2732). This includes ensuring that training materials are in appropriate alternative formats as needed, e.g., Braille, audio, large type, assistive listening devices, and sign language interpreters.
- **Accessible Meeting Facilities for Persons with Disabilities:** When holding public meetings, PHAs must give priority to methods that provide physical access to individuals with disabilities, i.e., holding the meetings, workshops, and briefings or any other type of meeting in an accessible location, in accordance with the regulations implementing Section 504 of the Rehabilitation Act of 1973 and Titles II and III of 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, in which case the PHA must take any action that would not result in such an alteration or such 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, in-home briefing. 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 nondisabled person to the fullest extent possible (28 CFR part 35, appendix B).
- **Meaningful Access for Persons with Limited English Proficiency (LEP):** PHAs must provide meaningful access to programs and activities for persons who have a limited ability to read, speak, or understand English. Any person with LEP who will be temporarily relocated or permanently displaced must have meaningful access to any public meetings regarding the project. In addition, any information provided to residents including, but not limited to, any notices required under the URA, should be provided in the appropriate language to persons with LEP. Generally, PHAs will be responsible for providing oral interpreters at meetings, including ensuring their competence, and covering any associated translation and interpretation costs.
- URA requires that PHAs provide persons who are unable to read or understand the notices, such as persons with disabilities or persons with LEP, with appropriate translation and counseling to ensure that they understand their rights and responsibilities and the assistance available to them (49 CFR 24.5). URA also requires that each notice indicate the name and telephone number of a person to contact with questions or for other needed help (49 CFR 24.5). This notice should include the number for the telecommunication device for the deaf (TDD) or other appropriate communication device, if applicable (24 CFR 8.6(a)(2)).

- **Comparable Housing for Persons with Disabilities:** PHAs should identify the accessibility need of residents to be relocated by consulting existing information (e.g., tenant 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). For guidance on providing relocation assistance to persons with disabilities, see Exhibit 3-1 in HUD Handbook 1378.
- **Advisory Services:** PHAs should determine the advisory services that will be necessary to ensure a successful relocation program consistent with 49 CFR 24.205(c). Such advisory services may include housing counseling that should be facilitated to ensure that residents affected by the project understand their rights and responsibilities and the assistance available to them (49 CFR 24.205(c)). Advisory counseling must also inform residents of their fair housing rights and be carried out in 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 CFR 24.205(c)(1)). In addition, PHAs should inform residents that if they believe they have experienced unlawful discrimination, they may contact HUD at 1-800669-9777 (Voice) or 1-800-927-9275 (TDD) or at <http://www.hud.gov>.

Fair Housing References:

- Section 504 of the Rehabilitation Act of 1973
- Regulations: 24 CFR part 8
- Fair Housing Act Regulations: 24 CFR part 100
- Title VI of the Civil Rights Act of 1964
- Regulations: 24 CFR part 1
- Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (LEP Guidance) (72 FR 2732)
- Exhibit 3-1 Compliance with Section 504 of the Rehabilitation Act in HUD Handbook 1378 (Tenant Assistance Relocation and Real Property Acquisition)

## 11. Other Requirements

### a. Public Housing Program Compliance

PHAs should note that public housing resident provisions related to occupancy and termination, including grievances and related hearings, will remain in effect until the execution of the new PBV or PBRA Housing Assistance Payment (HAP) contract.

### b. Evictions for Cause

If the PHA determines that a resident was evicted in accordance with applicable state and local law for serious or repeated violation of material terms of the lease, and the eviction was not undertaken for the purpose of evading the obligation to make available URA payments and other assistance, the resident is not entitled to relocation payments and assistance under the URA (49 CFR 24.206).

---

Jemine A. Bryon  
General Deputy Assistant Secretary  
for Public and Indian Housing

---

Carol J. Galante, Assistant Secretary for  
Housing-Federal Housing Commissioner

## APPENDICES

Appendix 1  
Recommended Relocation Plan Contents

Appendix 2  
Sample RAD General Information Notice (GIN)

Appendix 3  
Sample RAD Notice of Relocation (for relocation anticipated for a year or less)

Appendix 4  
Sample RAD Notice of Relocation (for relocation anticipated for more than a year)

Appendix 5  
Sample Notice of Eligibility for URA Relocation Assistance (for residents who have been temporarily relocated for more than a year)

## Appendix 1: RECOMMENDED RELOCATION PLAN CONTENTS

---

While written Relocation Plans are not required under RAD or URA, the Department strongly encourages PHAs to document their relocation planning process and procedures in a written Relocation Plan. The following provides suggested content for Relocation Plans.

### I. Project Summary

The Relocation Plan should provide a general description of and purpose for the project (e.g., year built, location, number of units, configuration, occupancy information, and funding sources).

The basic components of a plan include:

- A general description of the project and the site, including acquisition, demolition, rehabilitation, and construction activities and funding sources;
- A detailed discussion of the specific steps to be taken to minimize the adverse impacts of relocation, including when transferring the assistance to a new site;
- Information on occupancy (including the number of residents, residential owner-occupants and non-residential occupants, if any, to be permanently or temporarily relocated);
- Information on relocation needs and costs (including the number of residents who plan to relocate with Section 8 assistance);
- General moving assistance information;
- Temporary move assistance (including information on the duration of temporary moves);
- Permanent move assistance; and
- Appeals process.

### II. Resident Return and Re-occupancy Policies

For residents that will be temporarily relocated, the plan should include the criteria that will be used to determine the priority for residents to re-occupy units at the project after rehabilitation, demolition, and/or construction is completed. For example, if units will come online in stages, the plan should outline how the PHA will determine when each resident will return to the project. PHAs should ensure that any written return or re-occupancy policy is compliant with related RAD requirements, such as the right-to-return policy and the “no re-screening upon conversion” policy, as described in the RAD Notice.

### III. Summary of Moving Costs

The plan should include a summary of moving costs, identified by move types, including the following:

### Temporary Moves

- Number of and cost amount for two-way moves (i.e., a move to another unit and then a return move) within the same building/complex.
- Number of and cost amount for two-way moves to a unit not in the same building/complex, carried out by the PHA.
- Number of and cost amount for two-way moves to a unit not in the same building/complex not carried out by the PHA.

### Permanent Moves

- Number of and cost amount for one-time moves into another unit in the same building/complex.<sup>15</sup>
- Number of and cost amount for one permanent move to a unit not within the same building/complex, carried out by the PHA.  
PHAs should note that if a residential move is carried out by the PHA at no cost to the resident, this per-household estimate must include the required dislocation allowance (currently \$100). The URA Fixed Residential Moving Cost Schedule lists the most current dislocation allowance: [http://www.fhwa.dot.gov/real\\_estate/practitioners/uniform\\_act/relocation/moving\\_cost\\_schedule.cfm](http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm)
- Number of and cost amount for one permanent move to a unit not within the same building/complex that is not carried out by the PHA.

## IV. Temporary Relocation Assistance

The PHA will assist residents who are required to move temporarily. At the Initiation of Negotiations (ION), the PHA will send a RAD Notice of Relocation to residents who will be relocated. Appendices 3 and 4 of this Notice contain sample RAD Notices of Relocation to be provided to residents that will be temporarily relocated.

The plan should detail the temporary relocation assistance the PHA will provide for residents (Paragraph 2-7 of HUD Handbook 1378). This assistance includes:

- Temporary Housing - The PHA will provide temporary housing that is decent, safe, and sanitary on a nondiscriminatory basis for residents who are relocated temporarily. The PHA will also pay for reasonable increased housing costs that the resident incurs in connection with the temporary relocation.

NOTE: If a resident's relocation exceeds one year, the PHA must then issue a *Notice of Relocation Eligibility* (49 CFR 24.203(b)) to the resident and offer the resident permanent

---

<sup>15</sup> A resident who moved to another unit in the same building/complex may be considered a displaced person under URA if the resident moves from the building/complex permanently and was not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move within the same building/complex and/or if other conditions of the move within the building/complex were not reasonable.

relocation assistance and payments at URA levels. The PHA must provide this notice to affected residents as soon as the temporary relocation exceeds one year.

- Packing and Moving Assistance - Since most residents prefer to pack their own personal possessions and items of value, they should be provided packing instructions, boxes, markers, and tape for the move. If assistance in packing is needed, the PHA should provide the resident with information on how to request this assistance. The PHA is responsible for covering all reasonable moving expenses incurred in connection with temporarily relocating a resident. The PHA may reimburse the resident's out-of-pocket moving expenses and/or directly carry out the move.
- Payment for Temporary Relocation Moving Expenses - The plan should also indicate how the PHA intends to provide or reimburse for moving services and expenses. The PHA can choose to do one or more of the following:
  - Undertake the moves itself, using force account labor or a moving company;
  - Use PHA's contractor or moving company;
  - Carry out moves with employees of the PHA;
  - Reimburse residents for all actual and reasonable moving costs.

NOTE: The PHA will not make fixed payments since such payments may not be representative of actual reasonable costs incurred. However, in order for a resident to be sure of full reimbursement, the resident should submit a moving cost estimate to the PHA for approval prior to the move unless the PHA is directly carrying out the move and the resident will not incur any reasonable out-of-pocket moving expenses. Failure to do so may result in the resident not being fully reimbursed.

- Utility Costs - The PHA is responsible for covering the expenses relating to disconnection and reconnection of necessary utilities. If the resident has telephone, cable service or Internet access, the PHA is responsible for covering the expenses involved in transferring existing service. The PHA may also pay utility deposits, if required at the temporary relocation housing (HUD Handbook 1378, paragraph 2-7(A)(3)). If a resident is temporarily relocating from a public housing unit to a non-public housing unit, the resident must be reimbursed for reasonable increases in utility costs even if the PHA utility allowance is lower than the actual costs to the resident.

## V. Permanent Relocation Assistance

Based on the local housing resources available, the PHA should identify the replacement housing options that will be available to meet the housing needs of residents to be permanently relocated. Replacement housing options for residents that meet the definition of a "displaced person" (49 CFR 24.2(a)(9)) under the URA include, but are not limited to:

- Other Public Housing;
- Section 8 Project-Based Voucher unit;
- Section 8 Housing Choice Voucher unit;
- Homeownership housing;

- Private-market rental housing (affordable, non-subsidized).<sup>16</sup>

The plan should describe each type of replacement housing projected to be available, including:

1. Number of units, by bedroom size, expected to be available, and discussion of whether available units will meet dwelling requirements of relocated residents;
2. General area or location of unit(s);
3. Criteria for receiving relocation assistance; and
4. Any other information that might benefit residents in their consideration of housing choices.

The plan should include a description of the permanent relocation assistance the PHA will provide to residents. This assistance includes:

- Availability of Comparable Replacement Housing – Under URA, no displaced resident will be required to move unless at least one comparable replacement dwelling (49 CFR 24.2(a)(6)) is made available at least 90 days before the required move (49 CFR 24.203(c)). Comparable replacement dwellings must contain the accessibility features needed by displaced persons with disabilities (49 CFR 24.2(a)(8)(vii); 49 CFR part 24, Appendix A, §24.2(a)(8)(vii)). If the comparable replacement dwelling is not subsidized housing, the PHA should contact the RAD staff for advice on replacement housing payment requirements.
- Referral to Housing Not Located in an Area of Minority Concentration - Whenever possible, minority persons shall be given reasonable opportunities to relocate to decent, safe, and sanitary replacement dwellings that are within their financial means and not located in areas of minority concentration (49 CFR 24.205(c)(2)(ii)(D)). However, this policy does not require a PHA to provide a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling unit.
- Permanent Relocation Moving Expenses from Public Housing to Public Housing - The PHA may choose one of the following options for covering the expenses involved in moving public housing residents that are relocated into other public housing:
  - Undertake the move itself, using force account labor or a moving company. Residents should incur no moving costs under this option, but if such expenses are incurred, the PHA is responsible for reimbursing the resident for any such actual and reasonable expenses. In such case, the resident is also entitled to a dislocation allowance (currently \$100). The URA Fixed Residential Moving Cost Schedule lists the current dislocation allowance and is available at:  
[http://www.fhwa.dot.gov/real\\_estate/practitioners/uniform\\_act/relocation/moving\\_cost\\_schedule.cfm](http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm)

---

<sup>16</sup> Every effort should be made to find another subsidized unit as replacement housing for a resident relocating from subsidized housing so that the resident will continue receiving the housing subsidy as long as it is needed.

NOTE: Residents who prefer to pack their own personal possessions and items of value may be provided packing instructions, boxes, markers, and tape for their move. If a resident needs assistance in packing, they should contact the PHA. It is the responsibility of the PHA to pack and move all of their belongings and household goods, if so desired.

- Allow the resident to elect one of the following choices:
  - 1) The PHA will reimburse the resident for the cost of all actual reasonable and necessary moving and related expenses (49 CFR 24.301), such as:
    - Transportation of the resident and personal property. This may include reimbursement at the current mileage rate for personally owned vehicles that need to be moved. Transportation costs for a distance beyond 50 miles are not eligible, unless the PHA determines that relocation beyond 50 miles is justified.
    - Packing, crating, uncrating, and unpacking of personal property.
    - Storage of personal property for a period not to exceed 12 months, unless the PHA determines that a longer period is necessary.
    - Disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property.
    - Insurance for the replacement value of the property in connection with the move and necessary storage.
    - 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.
  - 2) The PHA will pay directly to the resident the applicable and current fixed moving cost payment according to the URA Fixed Residential Moving Cost Schedule (49 CFR 24.302), available at:  
[http://www.fhwa.dot.gov/real\\_estate/practitioners/uniform\\_act/relocation/moving\\_cost\\_schedule.cfm](http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm)
- Permanent Relocation Moving Expenses for All Other Moves – Under URA, residents who are permanently displaced, except for those residents displaced from public housing and moving to other public housing, are entitled to the assistance described in the brochure *Relocation Assistance To Residents Displaced From Their Homes*, available in English at [http://portal.hud.gov/hudportal/documents/huddoc?id=DOC\\_16280.doc](http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_16280.doc) and in Spanish at [http://portal.hud.gov/hudportal/documents/huddoc?id=DOC\\_16281.doc](http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_16281.doc). Residents may choose moving assistance from one of the following two options.
  - 1) The PHA will reimburse the resident for the cost of all actual reasonable moving and related expenses (49 CFR 24.301).
  - 2) The PHA will pay directly to the resident the applicable and current fixed moving cost payment according to the URA Fixed Residential Moving Cost Schedule (49

CFR 24.302), available at:

[http://www.fhwa.dot.gov/real estate/practitioners/uniform act/relocation/moving cost schedule.cfm](http://www.fhwa.dot.gov/real%20estate/practitioners/uniform%20act/relocation/moving%20cost%20schedule.cfm).

- Replacement Housing Payment - In addition to covering moving expenses, displaced residents may be entitled to a replacement housing payment (RHP). This payment is intended to cover the increase, if any, in monthly housing costs for a 42-month period.

When calculating the RHP, the PHA must consider the comparable replacement housing unit offered to the resident. Since the PHA is not required to pay an RHP amount that exceeds the amount of RHP calculated for the offered comparable replacement dwelling, residents are cautioned to work closely with the PHA prior to their move.

- Accessible Housing for Persons with Disabilities - Under the URA, persons with disabilities who will be permanently displaced must be relocated to a replacement dwelling that contains the accessibility features they need (49 CFR 24.2(a)(8)(vii); 49 CFR Appendix A, 24.2(a)(8)(vii)). A person with disabilities who has been relocated must be offered a comparable replacement dwelling unit that contains accessible features comparable to the housing from which the tenant has been displaced or relocated. This is so even if the tenant has paid for the acquisition and/or installation of accessible features in the housing from which he or she has been relocated; in such instances, the recipient must ensure that the replacement housing contains comparable accessible features or provide relocation assistance to the tenant in an amount that covers the cost of acquiring and/or installing comparable accessible features. Under the URA, an agency may use project funds to remove architectural barriers for displaced owners and tenants with disabilities or take other last resort housing measures if comparable replacement dwelling units are not available within the monetary limits prescribed under the URA regulations (49 CFR 24.404(c)(vii); HUD Handbook 1378, Paragraph 3-8).

## VI. Relocation Budget

Based on the results of the planning process, the PHA 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.)  
NOTE: This physical move cost total should be based on the move scenarios anticipated

or projected by the resident survey.

- 4) The cost estimated to pay for projected increases in monthly housing costs for temporary relocation.
- 5) The cost estimated to pay for the replacement housing payment (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. (The PHA should state where these costs are indicated in the application, or attach any other information required by HUD, to support these costs.)

## **VII. Appeal Process**

If a resident disagrees with the PHA'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, the resident may file a written appeal to the PHA. The Relocation Plan should describe the specific appeal procedures to be followed consistent with 49 CFR 24.10 (and 24 CFR 42.390 if section 104(d) is involved). At a minimum, the resident will have 60 days to file an appeal with the PHA after receiving written notification of a claim or ineligibility determination.

## **VIII. Certification**

The plan should contain a certification of compliance with the URA and, if applicable, section 104(d).

### **Technical Assistance**

The PHA should direct questions on this Notice's relocation assistance requirements to their RAD Transaction Manager or [email rad@hud.gov](mailto:email_rad@hud.gov).

## Appendix 2: SAMPLE RAD GENERAL INFORMATION NOTICE (GIN)

---

### PHA LETTERHEAD

#### RENTAL ASSISTANCE DEMONSTRATION (RAD) GENERAL INFORMATION NOTICE (GIN)

[Date]

Dear [Resident Name],

The property you currently occupy is being proposed for participation in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. At this time, we expect that [the proposed acquisition, rehabilitation or demolition, may require you to be relocated (temporarily or permanently) from your unit]. We will provide further details to you as plans develop. **This notice does not mean that you need to leave the property at this time. This is not a notice of eligibility for relocation assistance.** The remainder of this letter only applies to situations where you will need to be relocated from your unit.

This notice serves to inform you of your potential rights under the RAD program and a federal law known as the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). If the proposed RAD project receives HUD approval and if you are displaced permanently as a result, you may become eligible for relocation assistance and payments under the URA, including:

- 1) Relocation advisory services that include referrals to replacement properties, help in filing payment claims and other necessary assistance to help you successfully relocate;
- 2) At least 90 days' advance written notice of the date you will be required to move;
- 3) Payment for moving expenses; and
- 4) Payments to enable you to rent a similar replacement home.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an immigrant lawfully present in the United States.

As a resident of a property participating in RAD, you have the right to return to the project after the project is complete. You will be able to lease and occupy a unit in the converted project when rehabilitation is complete.

If you are permanently displaced from your home, you will not be required to move until you are given at least 90-day advance written notice of any required move and at least one comparable replacement dwelling has been made available to you. If you are temporarily relocated and your temporary relocation lasts more than one year, you will be contacted and offered permanent relocation assistance as a displaced person under the URA. This assistance would be in addition

to any assistance you may receive in connection with temporary relocation and will not be reduced by the amount of any temporary relocation assistance you have already received.

If you are required to relocate from the property in the future, you will be informed in writing. [PHA] will inform you of what assistance and payments you are eligible for if you will be relocated because of RAD and how you will receive these payments. If you become a displaced person, you will be provided reasonable assistance necessary to complete and file any required claim to receive a relocation payment. If you feel that your eligibility for assistance is not properly considered, you will also have the right to appeal a determination on your eligibility for relocation assistance.

You should continue to pay your rent and meet any other requirements specified in your lease. If you fail to do so, [PHA] may have cause for your eviction. If you choose to move, or if you are evicted, prior to receiving a formal notice of relocation eligibility, you may become ineligible to receive relocation assistance. It is very important for you to contact us before making any moving plans.

You will be contacted soon so that we can provide you with more information about the proposed project. If the project is approved, we will make every effort to accommodate your needs. In the meantime, if you have any questions about our plans, please contact: [Name, Title, Address, Phone, Email Address]. This letter is important to you and should be retained.

Sincerely,

[Name]

[Title]

NOTES:

1. Files must indicate how this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378)
2. This is a sample GIN. PHAs should revise it to reflect project-specific circumstances.
3. PHAs may provide residents with HUD brochure "Relocation Assistance To Residents Displaced From Their Homes" available at: <http://www.hud.gov/offices/cpd/library/relocation/publications/1042.pdf>.

Appendix 3: SAMPLE RAD NOTICE OF RELOCATION (For relocation anticipated for a year or less)

---

*THIS IS A GUIDE FORM.  
REVISE TO REFLECT THE PROJECT-SPECIFIC CIRCUMSTANCES.*

PHA Letterhead

(date)

Dear [*Resident Name*],

The property you currently occupy is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. On [*date*], the [*Public Housing Authority*] (PHA) notified you of proposed plans to [acquire/ rehabilitate/demolish] the property you currently occupy at [*address*]. On [*date*], HUD issued the RAD Conversion Commitment (RCC) and committed federal financial assistance to the project. [*In instances where a Notice of Intent to Acquire is applicable and this notice is being sent before the RCC is issued, in lieu of the previous sentence noting the RCC issuance date, insert: [Name of entity acquiring the property] (Displacing Agency) intends to acquire the property you currently occupy. This is a Notice of Intent to Acquire.*]

In order for PHA to complete the project, you will need to be relocated for [*anticipated duration of relocation*]. Upon completion of the project, you will be able to lease and occupy your present unit or another decent, safe and sanitary unit in the completed project under reasonable terms and conditions. You are eligible for relocation payments and assistance.

However, **you do not need to move now.** This notice informs you that a decent, safe, and sanitary dwelling unit, listed below, has been made available to you and you will be required to move by [*insert date at least 30 days after the date of this notice*].

If your temporary relocation exceeds one year and you qualify as a "displaced person" under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), you may be eligible for further relocation assistance and payments under URA.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

The relocation assistance to which you are entitled includes:

Payment for Moving Expenses. You are entitled to be reimbursed for all reasonable out-of-pocket expenses incurred in connection with any temporary

move. [PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 4 of this Notice.]

The location of your temporary replacement unit is [address]. This temporary housing has been determined to be decent, safe and sanitary.

List appropriate relocation advisory services and any other services and assistance provided.]

If you disagree with this determination, you may file a written appeal to the PHA in accordance with 49 CFR 24.10.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [Name, Title, Address, Phone, Email Address] before you make any moving plans. He/she will assist you with your move to a temporary unit and help ensure that you preserve your eligibility for any relocation payments to which you may be entitled.

**Remember, do not move or commit to the purchase or lease of a replacement home** before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

\_\_\_\_\_  
Print name:

Title:

*NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)*

Appendix 4: SAMPLE RAD NOTICE OF RELOCATION (For relocation anticipated for more than a year)

---

***THIS IS A GUIDE FORM.  
REVISE TO REFLECT THE PROJECT-SPECIFIC CIRCUMSTANCES.***

PHA Letterhead

(date)

Dear [*Resident Name*],

The property you currently occupy is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. On [*date*], the [*Public Housing Authority*] (PHA), notified you of proposed plans to [*acquire/ rehabilitate/demolish*] the property you currently occupy at [*address*]. On [*date*], HUD issued the RAD Conversion Commitment (RCC) and committed federal financial assistance to the project. [*In instances where a Notice of Intent to Acquire is applicable and this notice is being sent before the RCC is issued, in lieu of the previous sentence noting the RCC issuance date, insert: [Name of entity acquiring the property] (Displacing Agency) intends to acquire the property you currently occupy. This is a Notice of Intent to Acquire.*]

In order for PHA to complete the project, you will need to be relocated for [*anticipated duration of relocation*]. Upon completion of the project, you will be able to lease and occupy your present unit or another decent, safe and sanitary unit in the completed project under reasonable terms and conditions. You are eligible for relocation assistance and payments. Because we expect your relocation to exceed one year, you have the choice to either:

- Receive temporary relocation assistance and return to a unit in the RAD project once it is complete; or
- Receive permanent relocation assistance and payments consistent with the URA instead of returning to the completed RAD project.

You must inform us of your choice within 30 days.

However, **you do not need to move now.** If you choose temporary relocation assistance, you will not be required to move sooner than 30 days after you receive notice that a temporary unit is available for you. If you choose permanent relocation assistance, you will not be required to move sooner than 90 days after you receive written notice that at least one comparable replacement unit is available to you in accordance with 49 CFR 24.204(a). [*Note to PHA: These time periods may start running as of the date of this Notice if the notice of relocation includes such information on the temporary and/or comparable replacement dwelling options, as applicable. In such circumstance, add applicable sentences to adequately notify the resident. For example: This notice informs you that a temporary unit, listed below, has been made available to you and, if you choose this option, you will be required to move by [date no sooner than 30 days after notice]. This notice informs you*

that a comparable unit, listed below, has been made available to you and, if you choose this option, you will be required to move by [*date no sooner than 90 days after notice*].]

If you choose temporary relocation, your relocation exceeds one year and you qualify as a “displaced person” under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), you may become eligible for further relocation assistance and payments under URA.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

If you choose to receive temporary relocation assistance, this assistance will include:

- Payment for Moving Expenses. You are entitled to be reimbursed for all reasonable out-of-pocket expenses incurred in connection with any temporary move. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 4 of this Notice.*]
- The location of your temporary replacement unit is [*address*]. This temporary housing has been determined to be decent, safe and sanitary.
- [*List appropriate relocation advisory services and any other services and assistance provided.*]

If you elect to receive permanent relocation assistance, this assistance will include:

- Relocation Advisory Services. You are entitled to receive current and continuing information on available comparable replacement units and other assistance to help you find another home and prepare to move.
- Payment for Moving Expenses. [*PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 5 of this Notice.*]
- Replacement Housing Payment. You may be eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including: (1) the monthly rent and cost of utility services for a comparable replacement unit, (2) the monthly rent and cost of utility services for your present unit, and (3) 30% of your average monthly gross household income. This payment is calculated on the difference between the old and new housing costs for a one-month period and multiplied by 42.
- [*PHA: list here any permanent relocation assistance offered, such as a Housing Choice Voucher.*]

- Listed below are three comparable replacement units that you may wish to consider for your replacement home. If you would like, we can arrange transportation for you to inspect these and other replacement units.

	Address	Rent & Utility Costs	Contact Info
1.			
2.			
3.			

We believe that the unit located at [address] is most representative of your original unit in the converting RAD project. The monthly rent and the estimated average monthly cost of utilities for this unit is [\$ amount] and it will be used to calculate your maximum replacement housing payment. Please contact us immediately if you believe this unit is not comparable to your original unit. We can explain our basis for selecting this unit as most representative of your original unit and discuss your concerns.

Based on the information you have provided about your income and the rent and utilities you now pay, you may be eligible for a maximum replacement housing payment of approximately [\$ (42 x monthly amount)], if you rent the unit identified above as the most comparable to your current home or rent another unit of equal cost.

Replacement housing payments are not adjusted to reflect future rent increases or changes in income. This is the maximum amount that you would be eligible to receive. If you rent a decent, safe and sanitary home where the monthly rent and average estimated utility costs are less than the comparable unit, your replacement housing payment will be based on the actual cost of that unit. All replacement housing payments must be paid in installments. Your payment will be paid in [#] installments.

You may choose to purchase (rather than rent) a decent, safe and sanitary replacement home. If you do, you would be eligible for a down-payment assistance payment which is equal to your maximum replacement housing payment, [\$amount.] *[PHAs should note that, at the agency's discretion, a down-payment assistance payment that is less than \$5,250 may be increased to any amount not to exceed \$5,250. (See 49 CFR 24.402(c)(1)).]* Let us know if you are interested in purchasing a replacement home and we will help you locate such housing.

Please note that all replacement housing must be inspected in order to ensure it is decent, safe and sanitary before any replacement housing payments are made.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [Name, Title, Address, Phone, Email Address] before you make any moving plans. He/she will assist you with your move to a new home and help ensure that you preserve your eligibility for all relocation payments to which you may be entitled.

**Remember, do not move or commit to the purchase or lease of a replacement home** before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

\_\_\_\_\_  
Print name:

Title:

Enclosure/s

*NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)*

Appendix 5: SAMPLE NOTICE OF ELIGIBILITY FOR URA RELOCATION ASSISTANCE (For residents who have been temporarily relocated for more than a year)

---

***THIS IS A GUIDE FORM.  
IT SHOULD BE REVISED TO REFLECT THE CIRCUMSTANCES.***

PHA Letterhead

(date)

Dear [*Resident*]:

The property you formerly occupied at [*address*] is participating in the Department of Housing and Urban Development’s (HUD) Rental Assistance Demonstration (RAD) program. You have been temporarily relocated from that property since [*date*]. Your temporary relocation has exceeded one year.

It has been determined that you qualify as a “displaced person” according to the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). You are eligible for relocation assistance and payments under the URA.

**You may choose to remain temporarily relocated and return to a unit in the RAD project once it is completed.** It is currently estimated that you may return to the RAD project by [*date*]. If you choose to remain temporarily relocated, you will stay at your current location until the RAD project is completed.

Alternatively, you may choose permanent relocation assistance and payments for which you are eligible, as listed below. If you choose permanent relocation assistance, you give up your right to return to the completed RAD project. However, **you do not need to move now.** If you choose permanent relocation assistance instead of exercising your right to return to the completed RAD project, you will not be required to move sooner than 90 days from the date that at least one comparable replacement unit has been made available to you. [*Alternatively: You will not be required to move sooner than 90 days from the date of this notice, which informs you of a comparable replacement unit that has been made available for you.*]

**This is your Notice of Eligibility for relocation assistance.**

**The effective date of your eligibility is [*insert date that relocation exceeds one year.*]**

**NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h).** All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

Enclosed is a brochure entitled, "Relocation Assistance to Tenants Displaced From Their Homes." Please read the brochure carefully. It explains your rights and provides additional information on eligibility for relocation payments and what you must do in order to receive these payments.

The relocation assistance to which you are entitled includes:

- Relocation Advisory Services. You are entitled to receive current and continuing information on available comparable replacement units and other assistance to help you find another home and prepare to move.
- Payment for Moving Expenses. *[PHA should list the form of payment for moving expenses selected in accordance with Appendix 1, Section 5 of this Notice.]* This is in addition to any amounts received to reimburse for any reasonable out-of-pocket expenses incurred in connection with the temporary move.
- Replacement Housing Payment. You may be eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including: (1) the monthly rent and cost of utility services for a comparable replacement unit, (2) the monthly rent and cost of utility services for your present home, and (3) for low-income persons, 30 percent of your average monthly gross household income. This payment is calculated on the difference between the old and new housing costs for a one-month period and multiplied by 42.
- *[PHA list here any other relocation assistance offered the resident, such as Housing Choice Voucher.]*

Listed below are three comparable replacement units that you may wish to consider for your replacement home. If you would like, we can arrange transportation for you to inspect these and other replacement units.

	Address	Rent & Utility Costs	Contact Info
1.			
2.			
3.			

We believe that the unit located at *[address]* is most representative of the original unit you occupied in the converting RAD project. The monthly rent and the estimated average monthly cost of utilities for this unit is *[\$amount]* and it will be used to calculate your maximum replacement housing payment. Please contact us immediately if you believe this unit is not comparable to your original unit. We can explain our basis for selecting this unit as most representative of your original unit and discuss your concerns.

Based on the information you have provided about your income and the rent and utilities you now pay, you may be eligible for a maximum replacement housing payment of approximately  $\$ [42 \times \$Amount]$ , if you rent the unit identified above as the most comparable to your current home or rent another unit of equal cost.

Replacement housing payments are not adjusted to reflect future rent increases or changes in income. This is the maximum amount that you would be eligible to receive. If you rent a decent, safe and sanitary home where the monthly rent and average estimated utility costs are less than the comparable unit, your replacement housing payment will be based on the actual cost of that unit. All

replacement housing payments must be paid in installments. Your payment will be paid in [#] installments.

Should you choose to purchase (rather than rent) a decent, safe and sanitary replacement home, you would be eligible for a downpayment assistance payment which is equal to your maximum replacement housing payment, [\$ amount] *[PHAs should note that, at the agency's discretion, a downpayment assistance payment that is less than \$5,250 may be increased to any amount not to exceed \$5,250. (See 49 CFR 24.402(c)(1)).]* Let us know if you are interested in purchasing a replacement home and we will help you locate such housing.

Please note that all replacement housing must be inspected in order to ensure it is decent, safe, and sanitary before any replacement housing payments are made.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [Name, Title, Address, Phone, Email Address] before you make any moving plans. He/she will assist you with your move to a new home and help ensure that you preserve your eligibility for any applicable relocation payments.

**Remember, do not move or commit to the purchase or lease of a replacement home** before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

---

Print Name:

Title:

Enclosure/s

*NOTE: The case file must indicate the manner in which this notice was delivered (e.g., personally served or certified mail, return receipt requested) and the date of delivery. (See 49 CFR 24.5 and Paragraph 2-3(J) of Handbook 1378.)*

