



**HOUSING
AUTHORITY
OF THE CITY
OF COLLEGE
PARK**

**FIVE-YEAR
AGENCY PLAN
2024-2028**

Michelle Johnson, Executive Director

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5 YEAR PLAN

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HOUSING AUTHORITY OF THE CITY OF COLLEGE PARK

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EXECUTIVE DIRECTOR

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April 3, 2024

EXECUTIVE SUMMARY

The Public Housing Agency (PHA) is required to submit a 5-Year Plan to the U.S. Department of Housing and Urban Development (HUD) which details the need for assisted housing in the PHA's jurisdiction and describes how those needs will be met. In addition, the PHA is required to submit a Five-Year Plan identifying how allocated funds will be expended. The proposed plan covers the period 2024-2028.

BACKGROUND/DISCUSSION

The plan reviews progress on goals established in the previous 5-Year Plan, sets goals to address identified housing needs, certifies compliance with federal regulations, and outlines anticipated property improvements and uses of capital funds made available by HUD. The 5-Year Plan may be modified from time to time as needed to meet the community needs or adjust resources available to the PHA. Changes must be processed according to the PHA's Significant Amendment and Substantial Deviation/Modification Policy as provided in the Plan.

Approval of the PHA's plan allows for the continued receipt of funds to support the operation and maintenance of the public housing property, Attick Towers. Approval of this resolution and submission allows the Housing Authority of the City of College Park to continue receiving funds to support the PHA programs. Failure to submit and receive HUD approval of the Plan would disqualify the PHA from continuing to receive annual allocations for the public.



HUD FORM
50075-5Y

5-Year PHA Plan (for All PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The **Form HUD-50075-5Y** is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.																																
A.1	<p>PHA Name: <u>Housing Authority of the City of College Park</u> PHA Code: <u>MD017</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2024</u> The Five-Year Period of the Plan (i.e. 2019-2023): <u>2024-2028</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.)</p> <table border="1"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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		PH	HCV																														
Lead PHA:																																	

B.	Plan Elements. Required for <u>all</u> PHAs completing this form.
B.1	<p>Mission. State the PHA’s mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA’s jurisdiction for the next five years.</p> <p>HACCP’s mission is to promote self-sufficiency, personal growth, and neighborhood revitalization by maximizing our resources and maintaining the fiscal goals of this Agency. HACCP believes that housing is a fundamental right and the substance for a successful life. We are committed to serving the City of College Park and surrounding communities in a manner that demonstrates professionalism, care, and consideration.</p>

B.2

Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.

FY 2024-2028 HOUSING AUTHORITY OF THE CITY OF COLLEGE PARK (HACCP) GOALS AND OBJECTIVES:

Goal 1: Expand the Supply of Assisted/Affordable Housing

Goals and Objectives of the Housing Agency of the City of College Park:

The HACCP established the following objectives to strive in meeting goal # 1.

- *Increase the availability of decent, safe, and affordable housing*
- *Expand the supply of assisted housing:*
- *Apply for rental vouchers should they become available*
- *Improve the quality of assisted housing*
- *Increase housing opportunities through the Housing Authority's*
- *Reduce vacancies as a result of Covid-19*
- *Acquire or build units or developments*
- *Leverage private or other public funds to create additional housing opportunities*

Goal 2: Improve Community Quality of Life and Economic Vitality:

The HACCP established the following objectives to strive in meeting goal # 2.

- *Improve public housing management PHAS score:*
- *Concentrate on efforts to improve specific management functions (e.g., public housing finance, unit inspections.*
- *Renovate and/or modernize public housing*
- *Reposition from Public Housing to Project Based subsidy or Section 18*

Goal 3: Provide an Improved Living Environment:

The HACCP will provide an improved living environment established by the following objectives to strive in meeting goal # 3.

- *Rehabilitation or demolition of Attick Towers*
- *Create more UFAS units*
- *Enhance Security at HACCP property*
- *Promote Access to Effective Economic Opportunity, Education, and Health Services*
- *Apply for Section 18 or RAD PBV*

GOAL 4 #: Ensure Equal Opportunity and Affirmatively Further Fair Housing Objectives:

The HACCP established the following objectives to strive in meeting goal # 4.

- *Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, sex, disability, familial status, national origin, marital status, sources of income sexual orientation*
- *Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, sex, disability, familial status, national origin, marital status, sources of income sexual orientation*
- *Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.*

- | | |
|--|--|
| | <ul style="list-style-type: none">○ <i>Respond to residents and applicants relating to possible discrimination-based incidents and the implementation of procedures for addressing allegations of incidents with a perceived or actual discriminatory dimension</i>○ <i>Investigate allegations of discrimination based on sexual orientation</i> |
|--|--|

B.3

Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

1. Develop a plan to Improve parking options for Authority residents:

a. The HACCP has inspected, surveyed and completed an evaluation of the parking lot. The HACCP has restriped the parking lot and plans to increase the parking spaces at Attick Towers Apartment in the future.

2. Build stronger building entrance and security practices:

a. The HACCP has undated our security camera system software.

b. The HACCP has hired on site security during office hours.

c. The HACCP has hired onsite security after hours to monitor activity at night onsite.

3. Upgrade electrical and mechanical systems:

a. The HACCP has updated all interior electrical outs throughout the building. The HACCP will continue to repair, update and evaluate the electrical and mechanical systems as needed.

4. Retrofit and upgrade heating and plumbing systems:

a. The HACCP was awarded an Energy & Safety Grant in order to replace the dual piping system throughout the first floor of Attick Towers Apartments. The HACCP has selected a company through the competitive bidding process. During further inspection it was determined all piping at Attick Towers must be replaced. The HACCP is reevaluating it's place to include the replacement of the interior plumbing piping throughout the building. **Complete.**

b. The HACCP completed an energy audit assessment of Attick Towers in 2019.

c. The HACCP will continue to examine and improve energy efficiency of building through addition of energy efficiency measures and improved insulation.

5. Survey building envelope and establish list of deficiencies

a. The HACCP completed an Energy Audit Assessment of Attick Towers in 2019, the HACCP will have an assessment in 2024.

b. The HACCP completed a Physical Needs Assessment of Attick Towers in 2019.

6. Expand programming to support the wellbeing of handicapped/disabled Attick Towers residents under 62 years of age:

a. The HACCP has partnered with the City of College Park in efforts to improve the lives of the tenants at Attick Towers. The Advocacy includes assistance with Social Security and Medicare, medical assistance, health insurance plans, prescription programs, financial and government entitlement programs, medical providers, social engagement opportunities, transportation and information and referral to other community services. Social events include health and wellness fairs, exercise classes, holiday parties, bingo and shows. Transportation includes rides to medical, dental or other required services or events within a seven-mile radius of the City of College Park.

	<p>7. Expand transportation options for residents: <i>a. The HACCP has partnered with the City of College Park in efforts to improve the lives of the tenants at Attick Towers. The Advocacy includes Transportation rides to medical, dental or other required services or events within a seven-mile radius of the City of College Park.</i></p> <p>8. Revitalize and enhance community: <i>a. The HACCP maintains the aesthetics of the interior and exterior of the property as needed.</i></p>
<p>B.4</p>	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA’s goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p><i>Notification to Program Applicants and Participants [24 CFR 5.2005(a)(1)] PHAs are required to inform program participants of their rights under VAWA, including their right to confidentiality and the limits thereof. Since VAWA provides protections for applicants as well as participants, PHAs may elect to provide the same information to applicants.</i></p> <p>HACCP Policy: <i>In accordance with the Violence Against Women Act (VAWA, the Housing Authority of the City of College Park. HACCP will not deny admission to any applicant on the basis that the applicant or a member of the applicant’s immediate household is or has been a victim of domestic violence, dating violence, sexual assault, or stalking if the applicant is otherwise qualified. PHA will request applicants who allege they are victims to certify via a HUD approved certification form that they are a victim of domestic violence and that an incident or incidents are bona fide incidents of such actual or threatened abuse. The certification form must be received by the PHA within 14 days of receipts and must include the name of the perpetrator. PHA shall ensure the information received regarding victims of domestic violence will be maintained in confidential file, will not be entered into a shared database, will not be provided to any other entity unless the victim requests and consents; or unless otherwise required for use in eviction proceedings or required by law. The PHA works very closely with the Department of Social Services.</i></p>

C.	Other Document and/or Certification Requirements.
C.1	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p><i>As part of the Rental Assistance Demonstration (RAD), The Housing Authority of the City of College is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:</i></p> <p>A. The following actions will be considered a Significant Amendment or Modification to the Five-Year Plan and Annual Plan:</p> <ul style="list-style-type: none"> <i>i. A change which would significantly affect rent or admissions policies or organization of HACCP's waiting lists.</i> <i>ii. A significant addition of non-emergency work items not included in the Capital Fund Program Annual Statement(s).</i> <i>iii. An exception to this definition will be made for any new activities that are adopted to reflect changes in HUD regulatory requirements or as a result of a declared emergency (such changes will not be considered significant amendments or modifications by HACCP).</i> <i>iv. Any proposed demolition, disposition, homeownership, Capital Fund financing, development, or mixed-finance projects not identified in the plan.</i> <p>B. <i>As part of the Rental Assistance Demonstration (RAD), HACCP is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items per Notice PIH 2012-32 (HA) H-2017-03, REV-3:</i></p> <ul style="list-style-type: none"> <i>i. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;</i> <i>ii. 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;</i> <i>iii. Changes to the construction and rehabilitation plan for each approved RAD conversion; and</i> <i>iv. Changes to the financing structure for each approved RAD conversion.</i>
C.2	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/> Due to the pandemic the RAB dismantled.</p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.3	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.4

Required Submission for HUD FO Review.

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

Y N

(b) If yes, include Challenged Elements.

D.

Affirmatively Furthering Fair Housing (AFFH).

D.1

Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

The Housing Authority of the City of College Park (HACCP) will implement policy and procedures considering the following goals and measures:

A. Taking proactive steps beyond simply combating discrimination to foster more inclusive communities, support and promote integrated communities, and overcome segregated living patterns.

i. The agency supports all local, state and federal legislation that enhances and sustains affordable housing development in the county, especially in opportunity areas. This includes efforts to reduce discrimination against low-income families, inclusionary zoning that enhances opportunities for development, and additional financial resources that positively impact protected classes and low-income families.

ii. The agency seeks to partner and assist in any way possible to provide new affordable housing in the county and will provide any resources available for successful outcome.

B. Promote fair housing choice for all persons by providing access to community assets for all persons protected by the Fair Housing Act and addressing significant disparities in access to community assets.

i. The HACCP has consistently strived to provide quality and comfortable housing resources for county citizens. The public housing portfolio has continuously been affected by reduced subsidies and reduced modernization funds; forcing the agency to consider other potential options to sustain the communities.

ii. The agency participates in the Maryland Association of Housing and Redevelopment (MAHR), National Association of Housing and Redevelopment (NAHRO) and the Public Housing Authorities Directors Association (PHADA) and other likeminded organizations that establish development-oriented relationships.

iii. HACCP staff will be trained and will continue to receive training in Fair Housing policy, regulations and criticality by NAHRO and/or other providers.

iv. HACCP has interpreters on call for assistance for clients who are hearing impaired and we will provide the required service for any visually impaired consumer.

v. The agency implemented a more user-friendly Reasonable Accommodation program for clients. The new forms explain what the process is, types of accommodations and include easy forms to issue staff so that we can resolve them more effectively.

vi. HACCP has translated many forms into Korean and added software to our website to translate into different languages.

C. Ensuring compliance with civil rights and fair housing laws and work to end racially and ethnically concentrated areas of poverty and foster compliance with the non-discrimination provisions of the Fair Housing Act.

i. HACCP is committed to actively supporting fair housing and equal opportunity, to operating its housing and service programs in an open and non-discriminatory manner and to fully complying with all fair housing laws and regulations. In 2015, the US Department of Housing and Urban Development (HUD) issued new Affirmatively Further Fair Housing (AFFH) regulations which apply to federal agencies and grantees, including cities and public housing authorities.

D. Promote and provide housing that is structurally accessible to, and usable by, all persons, and provide opportunities for inclusive patterns of housing occupancy to protected classes.

i. The agency will continue to review application and eligibility processes and resources to eliminate barriers to any consumers and ensure that avenues to information and application do not impede specific population.

ii. The agency is sensitive to the socioeconomic issues affecting low-income families and now allows families to turn down one offer for a unit without cause and remain on the waiting list for the next available unit that meets their occupancy requirements. Denial of offers with reasonable cause is permitted.

iii. The agency also added a language translator to the website haccpmd.agency

iv. The agency provides on-site management to ensure that resident's needs are addressed as quickly as possible and that community maintenance and safety are highest priority.

v. Annual inspections are conducted by the City of College Park to ensure all units are in compliance with federal program condition, health, safety, and risk standards. 100% of the portfolio, common areas, systems and units are inspected.

vi. The agency has an approved grievance procedure that allows residents of public housing to appeal any adverse action taken by the agency against a resident. The formal grievance is presided over by an independent thirdparty officer to ensure federal compliance and all items of fair housing elements are met.

vii. The HACCP administers the Resident Opportunities & Self Sufficiency

Program which is designed to assist residents interested and willing to improve their education, employment, financial and provide mental health services. Also, to assist elderly or disabled residents, help improve living conditions and enable residents to age-in-place.

Instructions for Preparation of Form HUD-50075-5Y - 5-Year PHA Plan for All PHAs

- A. PHA Information.** All PHAs must complete this section. (24 CFR § 903.4)
- A.1** Include the full **PHA Name**, **PHA Code**, **PHA Fiscal Year Beginning** (MM/YYYY), **Five-Year Period** that the Plan covers, i.e. 2019-2023, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. Plan Elements.

- B.1 Mission.** State the PHA’s mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA’s jurisdiction for the next five years. (24 CFR § 903.6(a)(1))
- B.2 Goals and Objectives.** Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. (24 CFR § 903.6(b)(1))
- B.3 Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5- Year Plan. (24 CFR § 903.6(b)(2))
- B.4 Violence Against Women Act (VAWA) Goals.** Provide a statement of the PHA’s goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR § 903.6(a)(3)).

C. Other Document and/or Certification Requirements.

C.1 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the ‘Sample PHA Plan Amendment’ found in Notice PIH-2012-32, REV 2.

C.2 Resident Advisory Board (RAB) comments.

- (a) Did the public or RAB have comments?
- (b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. (24 CFR § 903.17(b), 24 CFR § 903.19)

C.3 Certification by State or Local Officials.

[Form HUD-50077-SL](#), *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.4 Required Submission for HUD FO Review.

Challenged Elements.

- (a) Did the public challenge any elements of the Plan?
- (b) If yes, include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.

D. Affirmatively Furthering Fair Housing.

(Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: “To implement goals and priorities in an AFH, strategies and actions shall be included in program participants’ ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing ...” Use the chart provided to specify each fair housing goal from the PHA’s AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D.; nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works 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. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 1.64 hours per year per response or 8.2 hours per response every five years, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

ATTACHMENT A

Housing Authority of the City of College Park

**Attachment A – Requirements for RAD-Specific PHA Plan and/or
Significant Amendment to the PHA Plan Submissions**

As a successful applicant in the Rental Assistance Demonstration (RAD), the Housing Authority of the City of College Park is submitting its 5-Year Public Housing Plan, as a result, the Housing Authority of the City of College Park (HACCP) will be converting to Project Based Rental Assistance under the guidelines of PIH Notice 2012-32, REV-1 and any successor notices, PIH-2019-09 PIH-2019-23 (HA). These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the Housing Authority of the City of College Park certifies that it is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement and the RAD conversion complies with all applicable site section and neighborhood reviews standards and that all appropriate procedures have been followed.

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

1. A description of the units to be converted. The description should include the following:
 - a. The number of units; **108**
 - b. The bedroom distribution of units: **65-Efficiencies 43-1 Bedrooms**
 - c. Families served- **Seniors and Disabled Persons**
2. Changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted.
 - a. If Converting to PBV: This includes any waiting list preferences that will be adopted for the Covered Project as well as the Resident Rights and Participation, Tenant Protections for residents stated in [Section 1.6](#), [Attachment 1B](#) of this Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice - Notice H 2016-17, PIH 2016-17 (HA) . (See Table 1 below for more specific guidance).
 - b. If Converting to PBRA: This includes any waiting list preferences that will be adopted for the Covered Project as well as the Resident Rights and Participation, Tenant Protections for residents stated in [Section 1.7](#) and [Attachment 1B](#) of this Notice and RAD Fair Housing, Civil Rights, and Relocation Notice - Notice H 2016-17, PIH 2016-17 (HA) . (see Table 1 below for more specific guidance).

Section 18 Demolition/ Disposition

The HACCP will also submit an application for Section 18 Demolition or disposition, this will allow HACCP to demolish or dispose of Public Housing units under certain criteria and entitles the HACCP to request Section 8 Tenant Protection Vouchers (TPVs) for any vacant unit occupied by an assisted household within the past 24 months. The PHA can elect to project communities (but not all) the TPVs result in rents that are higher than the RAD rents. In the case of disposition, the units be disposed of, which can be accomplished by transferring the asset to a PHA affordable housing. Section 18 also qualifies the PHA for certain phase programs.

The Section 18 program refers to Section 18 of the United States Housing Act of 1937, which governs HUD approvals for demolition and disposition of public housing. Prior to 1998, a PHA had to replace every public housing unit that was demolished or disposed with another “hard” (physical) Public Housing unit. The one-for-one replacement requirement proved challenging for PHAs, particularly given the limited funding that has been available for new Public Housing.¹ As a result, many severely distressed properties were frozen in a state of limbo, with no funds to adequately restore or replace the project but without permission to remove the project from HUD’s inventory. The 1998 Quality Housing and Work Responsibility Act (QHWRA) amended Section 18 to eliminate the one-for-one requirement, provided that a project meets certain criteria.

Approval under Section 18 makes the PHA eligible to receive Section 8 TPVs to protect HUD-assisted families and for all vacant units in the project that were occupied by an assisted family within 24 months prior to approval.² These TPVs are intended to make the PHA “whole” in terms of the number of households who can be assisted (replacing the Public Housing units with TPVs/vouchers). A PHA has the option, under Section 18, of either issuing these TPVs to affected households so that they can find housing on the private market or project-basing those TPVs back on the project to preserve the project as long-term affordable housing. Hence, Section 18 is a way to change the form of HUD assistance to Section 8, which can result in either project-based Section 8 or tenant-based Section 8.

In some cases, PHAs may be able to preserve a property approved under Section 18 by project-basing the TPVs (and securing other outside funding, including tax credits). In some situations, PBV rents may be higher than what the PHA was receiving under the Public Housing Program because the rents are based on what the PHA would pay the owner under the voucher program. PIH Notice 2021-07, describes seven separate ways that a Public Housing project can qualify for disposition under Section 18³.

¹ In 1999, Congress also enacted the Faircloth Limit, which placed constraints on new and replacement public housing units with Federal funds. See Faircloth Limit FAQs, issued June 2020.

² In this Guide, the standards referenced are for replacement TPVs, which are awarded when the Public Housing units will not be replaced. Alternately, “Relocation TPVs” are provided in cases where the PHA is replacing the Public Housing units removed through the repositioning action with other Public Housing units. Relocation TPVs are subject to different requirements not covered here

³ PIH Notice 2021-07, Demolition and/or disposition of Public Housing property, eligibility for tenant-protection vouchers, and Rental Assistance Demonstration REV-4 – Final Implementation

Obsolescence. To meet the obsolescence test for either Demolition or Disposition, a property must have existing capital needs (including those projected over the next three years) equal to or greater than 57.14% of HUD’s Total Development Costs (TDCs) for non-elevator structures and 62.5% for elevator structures⁴. In other words, the PHA must be able to demonstrate that the property is either in pretty poor physical condition, or have building components and systems that are obsolete, or a combination of both. Note that there is a difference between “obsolescence” and “habitability”. Some properties that meet the test of obsolescence are still perfectly habitable, while other properties that are no longer habitable may not meet the test for obsolescence.

Health and Safety. A project can qualify for Section 18 if the location presents clear health and safety risks to tenants that cannot reasonably be abated, such as a property located adjacent to a large electrical transformer station that emits loud noise disturbances or is built on land with contaminated soils.

More Efficient/Effective Housing. The final criterion for Section 18 disposition is when a PHA can demonstrate that removal of the units results in the creation of more efficient and effective housing. Under this criterion, there is no test of obsolescence; however, partly because there is no demonstration of obsolescence, HUD caps a PHA’s TPV eligibility at 25% of TPV-eligible units in the project being disposed. The actual number of units that the PHA will create, i.e., the more “efficient and effective units”, is negotiated between the PHA and HUD on a case-by-case basis. For example, assume that a PHA has an undesirable 100-unit project but the project’s capital needs do not meet the obsolescence test. The PHA would like to tear it down and build 50 new units, all of which would be supported by Section 8 PBVs. The PHA could remove the units through More Efficient/Effective Housing but because the project does not meet obsolescence, HUD will only provide 25 vouchers (25% of the total project). The PHA will then need to contribute the remaining PBVs from its own voucher program. Not many PHAs, understandably, have pursued this option. It is usually saved for assets that, while undesirable, do not meet the obsolescence test and the PHA is willing to remove them from their inventory, understanding that HUD will only provide TPVs for 25% of the units.

A key feature of the Section 18 program is the eligibility for phase-out funding under the Operating Fund and Capital Fund programs, called, respectively, Asset Repositioning Fees (ARF) and Demolition Disposition Transitional Funds (DDTF). ARF funds provide for a declining phase-out of operating subsidies over two years (if disposition) or three years (if demolition). Under DDTF, the Capital Fund Grant is continued for 5 years without any phase down.

The PHA also retains its “Faircloth Authority” for all units removed through Section 18 and Section 22. In 1999, Congress added a provision to the United States Housing Act of 1937 that prohibits a PHA from using Public Housing funds to maintain or operate Public Housing units in excess of then-

associated requirements, January 19, 2021

⁴ TDCs are regionally set and adjusted annually for changes in costs.
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current levels, named after the legislation’s sponsor, Senator Launch Faircloth of North Carolina. When a PHA removes units from Public Housing through Section 18, it retains that Faircloth Authority, meaning that it has the authority to return those units to the Public Housing Program if it finds a way to acquire or build replacement units. A PHA does not keep the Faircloth Authority corresponding to any unit converted under RAD based on the reasoning that these units have already been replaced within the Section 8 Program. If a PHA uses the “50 or Fewer” option under Section 18 to convert its last remaining units, although the PHA retains its Faircloth Authority, it is required to close out its Public Housing Program and therefore must transfer the Faircloth Authority to another PHA or relinquish that authority. This option is not applicable to small PHAs until the portfolio has been reduced to 50 or fewer units.

Another key aspect of the Section 18 program relates to PHAs that do not have their own Housing Choice Voucher (HCV) program. PHAs that do not have their own HCV program will need to partner with a PHA that does have an HCV program to administer the TPVs, since HUD does not authorize PHAs without an existing HCV program to establish one.

Section 18 is a “disposition” program, meaning that the property, in addition to being removed from the Public Housing Program, must actually be disposed of to a separate legal entity under State law, which can be (and most often is) a non-profit related to the PHA. Sometimes it is in the best interests of the PHA simply to sell the property at Fair Market Value (FMV), in which case the proceeds must be used to support the provision of low-income housing as defined by the United States Housing Act of 1937. However, a PHA can also dispose of the property for less than FMV if the disposition results in “commensurate public benefit”, such as affordable housing (housing for families at or below 80% of Area Median Income, or AMI). In these less-than-FMV transactions, it is common for a PHA to sell the property for \$1 to a non-profit arm of the PHA and then to redevelop the property as affordable housing.

Section 18 differs from the RAD program in a few important ways. Unlike RAD, a PHA cannot transfer any Public Housing Program funds – including Public Housing operating reserves – to a project that has been disposed of under Section 18. Public Housing funds can only be used for Public Housing purposes. Under certain circumstances, Public Housing funds can be used at a project that is planned for Section 18 or Streamline Voluntary Conversion, prior to the disposition.

Similarly, under Section 18 there is no provision to protect, as a legacy recipient of rental assistance, current tenants who might be over-income or otherwise ineligible as a new admission to the Section 8 Program. For Section 18, all existing Public Housing tenants must be rescreened for Section 8 eligibility in order to receive a TPV or benefit from a PBV. If a PHA has a household that is over-income, the PHA must find a way other than Section 8 to provide comparable assisted housing. Typically, PHAs will allow such households to remain in the unit, if the project is to be preserved as rental housing, at a rental rate comparable to that paid by the family under the Public Housing Program.⁵

⁵ See PIH Notice 202019 , Rent Reasonableness Based Voucher Programs, Defining Assisted Units for the Housing Rental Assistance Demonstration REV-4 – Final Implementation

There is also no required Capital Needs Assessment (CNA) or submission of a ‘financing plan’ to HUD for the future use of the property disposed under Section 18. Once a property is approved for Section 18, HUD’s primary interest is in making sure that:

1. Eligible tenants continue to be assisted and appropriately relocated , if applicable ;
2. The property is disposed of in accordance with program procedures (either for FMV or for less than FMV with a commensurate public benefit).

Provided the PHA satisfies the basic requirements, any redevelopment of the project, including any project-basing of vouchers, is determined by the PHA. The PHA sets the terms for what the project will be used for, the number of units to be assisted, income-mixing, and income-mixing.

Table 1: List of RAD Program Elements Affecting Resident Rights and Participation, Waiting List and Grievance Procedures for PBV and PBRA

Below, please find a table listing out each of the provisions affecting residents’ rights and participation, waiting list and grievance procedures that must be included in a PHA’s Significant Amendment. The table lists out the provisions applicable to the type of conversion (PBV or PBRA) that the PHA is proposing. This list is not a substitute for providing a copy of the relevant tenant protections listed below. PHAs should either provide reference to these tenant protections or place the tenant protections cited in this table directly into their Plan submission.

Project Based Voucher Requirements (Section 1.6 of Notice PIH 2019-09, PIH 2019-23; and Notice (HA) 2016-17, PIH 2016-17)	Project Based Rental Assistance Requirements (Section 1.7 of Notice H 2019-xx, PIH 2019-; and Notice H 2016-17, PIH 2016-17)
Tenant Protections Under Notice H 2016-17; PIH 2016-17	
1. Right to Return and Relocation Assistance	1. Right to return and Relocation Assistance
Tenant Protections Under Section 1.6.C (PBV) or Section 1.7.B (PBRA)	
1. No rescreening of tenants upon conversion	1. No rescreening of tenants upon conversion
2. Under-Occupied Unit	2. Under-Occupied Unit
3. Phase-in of tenant rent increase	3. Phase-in of tenant rent increase
4. FSS and ROSS-SC programs	4. FSS and ROSS-SC programs
5. Resident Participation and Funding	5. Resident Participation and Funding
6. Termination notification	6. Termination notification
7. Grievance process	7. Grievance process
8. Earned Income Disregard.	8. Earned Income Disregard
9. Jobs Plus (n/a)	9. Jobs Plus (n/a)

HACCP Requirements for RAD-Specific Significant Amendment Submissions

10. When Total Tenant Payment Exceeds Gross Rent.	10. When Total Tenant Payment Exceeds Gross Rent.
Tenant Protections Under Section 1.6.D (PBV) or Section 1.7.C (PBRA)	
1. Establishment of Waiting List	1. Establishment of Waiting List
2. Choice-Mobility	2. Choice-Mobility

ATTACHMENT B

Attachment B – Rental Assistance Demonstration (RAD)

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Housing Authority of the City of College Park with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority’s Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Housing Authority of the City of College Park may also borrow funds to address their capital needs. The Housing Authority of the City of College Park may also be contributing Operating Reserves, Capital Funds and/or Replacement Housing Factor (RHF) Funds towards the conversion if available.

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

Development #1

<p><u>Name of Public Housing Project:</u></p> <p><u>Attick Towers</u></p>	<p><u>PIC Development ID:</u></p> <p><u>MD017000001</u></p>	<p><u>Conversion type (i.e., PBV or Section 18 Deposition):</u></p> <p><u>PBV or Section 18 Disposition</u></p>	<p><u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u></p> <p><u>NO</u></p>
<p><u>Total Units:</u></p> <p><u>108</u></p>	<p><u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u></p> <p><u>Senior/Disabled</u></p>	<p><u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</u></p> <p><u>Senior/Disabled</u></p>	<p><u>Capital Fund allocation of Development: (Annual Capital Fund Grant attributable to the Project, if known) OR, (Total Annual Capital Fund allocation divided by total number of public housing units in PHA, multiplied by total number of units in project)</u></p> <p><u>\$240,303.00</u></p>

Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	65	0	Reconfiguration
One Bedroom	43	108	Reconfiguration
<u>(If performing a Transfer of Assistance):</u>	(Explain any changes in in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted) N/A		

Table 1: List of RAD Program Elements Affecting Resident Rights and Participation, Waiting List and Grievance Procedures for PBV and PBRA

Below, please find a table listing out each of the provisions affecting residents’ rights and participation, waiting list and grievance procedures that must be included in a PHA’s Significant Amendment. The table lists out the provisions applicable to the type of conversion (PBV or PBRA) that the PHA is proposing. This list is not a substitute for providing a copy of the relevant tenant protections listed below. PHAs should either provide reference to these tenant protections or place the tenant protections cited in this table directly into their Plan submission.

Project Based Voucher Requirements (Section 1.6 of Notice PIH 2019-09, PIH 2019-23; and Notice (HA) 2016-17, PIH 2016-17)	Project Based Rental Assistance Requirements (Section 1.7 of Notice H 2019-xx, PIH 2019-; and Notice H 2016-17, PIH 2016-17)
Tenant Protections Under Notice H 2016-17; PIH 2016-17	
1. Right to Return and Relocation Assistance	1. Right to return and Relocation Assistance
Tenant Protections Under Section 1.6.C (PBV) or Section 1.7.B (PBRA)	
1. No rescreening of tenants upon conversion	1. No rescreening of tenants upon conversion
2. Under-Occupied Unit	2. Under-Occupied Unit
3. Phase-in of tenant rent increase	3. Phase-in of tenant rent increase

HACCP Requirements for RAD-Specific Significant Amendment Submissions

4. FSS and ROSS-SC programs	4. FSS and ROSS-SC programs
5. Resident Participation and Funding	5. Resident Participation and Funding
6. Termination notification	6. Termination notification
7. Grievance process	7. Grievance process
8. Earned Income Disregard.	8. Earned Income Disregard
9. Jobs Plus (n/a)	9. Jobs Plus (n/a)

10. When Total Tenant Payment ExceedsGross Rent.	10. When Total Tenant Payment Exceeds Gross Rent.
Tenant Protections Under Section 1.6.D (PBV) or Section 1.7.C (PBRA)	
1. Establishment of Waiting List	1. Establishment of Waiting List
2. Choice-Mobility	2. Choice-Mobility

Resident Rights, Participation, Waiting List and Grievance Procedures

If converting to PBV: (Insert H 2019-09/PIH 2019-23 (HA), REV-4 Section 1.6.C & Section 1.6.D, and H-2016-17/PIH-2016-17, as a whole, into this Attachment to your PHA Plan)

A. PBV Resident Rights and Participation.

- 1. No Screening of Residents upon conversion.** Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.⁶ Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy. 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 income eligibility and income targeting of tenants at initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. Income eligibility requirements associated with new sources of financing, such as Low-Income Housing Tax Credits, do not supersede this prohibition on rescreening, and the Project Owner may be required to exclude Section 8 units occupied by ineligible households from being covered by the new financing's restrictions. Additionally, any owner-adopted preference shall not apply to any current resident.
- 2. Right to Return.** See Section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.
- 3. Phase-in of Tenant Rent Increases.** If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10 percent or \$25, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five

⁶ 1 These protections (as well as all protections in this Notice for current households) also apply when a household is relocated to facilitate new construction or repairs following conversion and subsequently returns to the Covered Project
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year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

4. **Renewal of Lease.** Since publication of the PIH Notice 2012-32 Rev 1, the regulations 24 CFR part 983 have been amended requiring Project Owners to renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.
5. **Phase-in of Tenant Rent Increases.** If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant’s TTP) would increase the tenant’s TTP by more than the greater of 10 percent or \$25, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of “total tenant payment” (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion. The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section “Calculated PBV TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1 (the first recertification following conversion), as illustrated below.

Three Year Phase-in:

- **Year 1:** Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP.
- **Year 2:** Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- **Year 3:** Year 3 AR and all subsequent recertifications – Full Calculated PBV TTP⁷

⁷ For example, where a resident’s most recently paid TTP is \$100, but the Calculated PBV TTP is \$200 and remains \$200 for the period of the resident’s occupancy, (i.e., no changes in income) the resident would continue to pay the same rent and utilities for which it was responsible prior to conversion. At the first recertification following conversion, the resident’s contribution would increase by 33% of \$100 to \$133. At the second AR, the resident’s contribution would increase by 50% of the \$66 differential to the standard TPP, increasing to \$166. At the third AR, the resident’s contribution would increase to \$200, and the resident would continue to pay the Calculated PBV TTP for the duration of Rental Assistance Demonstration REV-4 – Final Implementation

Five Year Phase in:

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

Please Note: In either the three-year phase-in or the five-year phase-in, once the Calculated PBV TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full TTP from that point forward. MTW agencies must also implement a three or five-year phase-in for impacted residents but may alter the terms above as long as it establishes a written policy setting forth the alternative terms. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

- 6. Continued eligibility for PH-Family Self-Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are currently FSS participants will continue to be eligible for FSS once their housing is converted under RAD. The PHA may continue to use any FSS funds already awarded to serve FSS participants in Covered Projects. Pursuant to the FY 2015 Appropriations Act, any FSS funds awarded in FY 2015 (and thereafter if the provision is extended), may be used to also serve any other PBRA resident (regardless of whether the resident is in a Covered Project).

Project Owners will be allowed to use any funds already granted for FSS coordinator salaries until such funds are expended. All Project Owners will be required to provide both service coordinators and payments to escrow until the end of the Contract of Participation for each resident. If the Project Owner is a PHA that continues to run an FSS program that serves public housing and/or HCV FSS participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding and may use that funding to serve public housing, HCV and/or PBRA FSS participants. However, if the PHA no longer has a public housing or HCV program, the Project Owner is not eligible to apply for FSS funding. The owner is not required to enroll new participants but may choose to do so in accordance with Housing Notice 2016-08.

Upon conversion, funds escrowed under the public housing program for FSS participants shall be transferred into the PBRA escrow account and be considered PBRA funds, thus reverting to PBRA if forfeited by the FSS participant. We have no current ROSS program or grant.

The HACCP is not eligible for the FSS program, PH Only.

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

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

8. 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.

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

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

provides for a shorter period of time, such shorter period shall apply.

10. Grievance Process Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act. For the termination of assistance and several other PHA determinations, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v),⁴⁰ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
1. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR §982.555(e)(4)(i).
 2. For any additional hearings required under RAD, the Project Owner will perform the hearing.
 - ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.
 - iii. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
 - iv. The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan. ⁴⁰ § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed

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

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

12. Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 24 CFR § 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants that move into the property following conversion or tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

13. When Total Tenant Payment Exceeds Gross Rent. Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit’s occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family’s TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family’s TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family’s TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family’s TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family’s TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. In such cases⁸, 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

⁸ 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.

requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC. To facilitate the uniform treatment of residents and units at a Covered Project, any non RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

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

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

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

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

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

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

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

14. Under-Occupied Unit. If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the underoccupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available.

PBV: Other Miscellaneous Provisions

- 3. Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
- 4. Davis-Bacon prevailing wages and Section 3 of the Housing and Urban Development Act of 1968 (Section 3)** The Davis-Bacon Act (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) and Section 3 (24 CFR Part 135) apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation. (The Davis-Bacon Act only applies for projects with nine or more units.)
- 5. Establishment of Waiting List.** The Project Owner can utilize a project specific or community waiting list. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including
 - i. Transferring an existing site-based waiting list to a new site-based waiting list.
 - ii. Transferring an existing site-based waiting list to a PBRA program-wide or HCV program-wide waiting list.
 - iii. Transferring an existing community-wide public housing waiting list to a PBRA program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
 - iv. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or

more newly created site-based waiting lists.

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

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

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

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing communitywide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).⁹

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

⁹ 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.
Rental Assistance Demonstration REV-4 – Final Implementation

assisted properties. To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision. A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

- 6. Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project.
- 7. 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 after 4 months, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing the following alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD: The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

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

- 8. Reserve for Replacement.** The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account or similar instrument, as approved by HUD, where funds will be held by the Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines.
- 9. Initial Certifications and Tenant Rent Calculations.** The Contract Administrator uses the family's public housing tenant rent (reflected on line 10f of the family's most recent HUD Form 50058) at the date of the conversion to calculate the PBV HAP and tenant rent until the effective date of the earlier of the family's first regular or interim recertification following the date of conversion. At the earlier of the family's first regular or interim recertification, the Contract Administrator will use the family's TTP based on the recertification and the HCV utility allowance (or the PBV site specific utility allowance, if applicable) to determine the PBV HAP and tenant rent. This means that the family pays the same tenant rent as the family was paying under the public housing program until the earlier of first regular or interim reexamination following conversion, at which point the normally applicable PBV calculation for the tenant rent becomes effective. (Under the PBV program, the monthly HAP is the rent to owner minus the tenant rent, and the tenant rent is the family TTP minus the utility allowance.) To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same property as the Covered Project shall be subject to the terms of this provision. To effectuate this provision, HUD is waiving 24 CFR 5.601 and 983.3(c)(6)(iii).
- 10. Submission of Year-End Financial Statements.** Projects converting assistance to PBRA must comply with 24 CFR part 5, subpart H, as amended, revised, or modified by HUD.¹⁰
- 11. Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing.

12. Jobs Plus. No grants awarded.

Significant Amendment Definition and Substantial Deviation.

As part of the Rental Assistance Demonstration (RAD), The Housing Authority of the City of College is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- A. The following actions will be considered a Significant Amendment or Modification to the Five-Year Plan and Annual Plan:
 - i. A change which would significantly affect rent or admissions policies or organization of HACCP's waiting lists.
 - ii. A significant addition of non-emergency work items not included in the Capital Fund Program Annual Statement(s).
 - iii. An exception to this definition will be made for any new activities that are adopted to reflect changes in HUD regulatory requirements or as a result of a declared emergency (such changes will not be considered significant amendments or modifications by HACCP).
 - iv. Any proposed demolition, disposition, homeownership, Capital Fund financing, development, or mixed-finance projects not identified in the plan.

- B. As part of the Rental Assistance Demonstration (RAD), HACCP is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items per Notice PIH 2012-32 (HA) H-2017-03, REV-3:
 - i. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
 - ii. 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;
 - iii. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
 - iv. Changes to the financing structure for each approved RAD conversion.

The PHA (as owner).

1. The PHA shall notify the public that the current and future Capital Fund Program Grants will be reduced as a result of any projects converting to RAD.
2. The HACCP received approximately \$238,358.00 for 2023 funding from HUD from the Capital Fund Program. Capital Fund Program Grants will no longer be available for the converted sites. The Burlington HACCP will fund replacement reserve accounts out of proceeds from contract rents.
3. Additionally, the HACCP has operating reserves to fund replacement reserve account.



**QUESTIONS
&
ANSWERS**

**HUD FORM
50075.1**

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. 2577-0157
 Expires 1/31/2027

“Public reporting burden for this collection of information is estimated to average 2.2 hours including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.. The information requested is required to obtain a benefit. This form is used to verify allowable and reasonableness of grant expenses. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Officer, Office of Policy Development and Research, REE, Department of Housing and Urban Development, 451 7th St SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0157.

PHA Name	Grant Type and Number) Capital Fund Program Grant No: Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval:
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- Type of Grant
- Original Annual Statement
 Reserve for Disasters/Emergencies
 Revised Annual Statement (revision no:
 Performance and Evaluation Report for Period Ending:
 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 15) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 15)				
5	1480 General Capital Activity				
6	1492 Moving to Work Demonstration				
7	1501 Collateralization Expense / Debt Service Paid by PHA				
8	1503 RAD-CFP				
9	1504 RAD Investment Activity				
10	1505 RAD-CPT				
11	9000 Debt Reserves				
12	9001 Bond Debt Obligation paid Via System of Direct Payment				
13	9002 Loan Debt Obligation paid Via System of Direct Payment				
14	9900 Post Audit Adjustment				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

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Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
15	Amount of Annual Grant:: (sum of lines 2 - 14)				
16	Amount of line 15 Related to LBP Activities				
17	Amount of line 15 Related Sect. 504, ADA, and Fair Housing Act Activities.				
18	Amount of line 15 Related to Security - Soft Costs				
19	Amount of line 15 Related to Security - Hard Costs				
20	Amount of line 15 Related to Energy Conservation Measures				
Signature of Executive Director *		Date		Signature of Public Housing Director	
				Date	

* I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties (18 U.S.C. § 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 5802)

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Part II: Supporting Pages								
PHA Name:			Grant Type and Number Capital Fund Program Grant No: CFFP (Yes/ No): Replacement Housing Factor Grant No: —			Federal FFY of Grant:		
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 ¹	Funds Obligated ²	Funds Expended ²	

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² To be completed for the Performance and Evaluation Report.

**SCOPE OF WORK
&
HUDFORM
50075.2**



Housing Authority of the City of College Park

Capital Fund 2024-2028

Scope of Work

This project will benefit 108 low to moderate income families by maintaining repairs and ordinary maintenance and operation of the units at Attick Towers Apartments.

The scope of work for the Capital Fund Program project will comprise of three components:

1. Administration (Staff salaries, office supplies and administrative items, etc.)
2. Management Improvement (Training and Information Technology, etc.)
3. Operations-Routine Maintenance (Plumbing leaks, GFI replacement, Painting, Walkway Repairs, Appliance Replacement, Site Improvement, etc.)

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Signature of Executive Director *		Date		Signature of Public Housing Director	
				Date	

* I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties (18 U.S.C. § 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 5802)

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Michelle Johnson, Executive Director



April 3, 2024

**Resolution LHA 24-1
HACCP
CAPITAL FUND PROGRAM
HUD FIVE-YEAR PLAN
2024-2028**

WHEREAS, the Quality Housing and Work Responsibility Act of 1998 directed housing authorities to prepare a Five Year Plan; and

WHEREAS, the Housing Authority of the City of College Park (HACCP) has prepared its Five-Year Action Plan for Federal Fiscal Years (FFs) 2024- 2028. The Agency's Five-Year Plan addresses the Authority's mission, goals, and objectives related to priority needs, operations, and programs for the fiscal year. Also, describing capital improvements needed to ensure the long-term viability of the agency's public housing development; and

WHEREAS, as permitted by regulations, HACCP has allocated portions of its projected CFP grant for administration, operations, and management improvements with the remaining funds dedicated to capital work items; and

WHEREAS, the Five Year Plan was discussed with the HACCP Board of Commissioners on May, 8 2024; and all comments were considered before finalizing the Five Year Plan and CFP Plan document;

I hereby, certify that the above Resolution is a true and exact copy of the Resolution adopted by the Board of Commissioners of the Housing Authority of the City of College Park at their regularly scheduled board meeting.

Resolved the 23rd day of May 2024

ATTEST:

**Housing Authority of the City of College
Park, Maryland**

Michelle Johnson
Executive Director

Arelis Pérez
Board Chairman