NOTICE OF REGULAR MEETING OF THE HOUSING AUTHORITY OF THE CITY OF RENO BOARD OF COMMISSIONERS

The Housing Authority of the City of Reno (Agency) will conduct a public meeting:

MEETING DATE: Tuesday, March 28, 2023
TIME: 12:00 p.m. (Approximately)

PLACE: Reno Housing Authority Boardroom

1525 East Ninth Street, Reno, Nevada

Persons wishing to provide public comment may participate during the scheduled meeting by commenting in person during the course of the meeting, or address their comments, data, views, arguments in written form to Hilary Lopez, Ph.D., Executive Director, Housing Authority of the City of Reno, 1525 East 9th Street, Reno, NV 89512-3012, Fax: 775.786.1712; e-mail address: HLopez@renoha.org. Written submission should be received by the Board on or before, March 27, 2023, by 5:00 p.m., in order to make copies available to members of the Board and the public.

Below is an agenda of all items scheduled to be considered. At the discretion of the chairperson or the Board, items on the agenda may be taken out of order; the Board may combine two or more agenda items for consideration, and the Board may remove an item from the agenda or delay discussion relating to an item on the agenda at any time. The public is advised that one or more members of the Board may participate in the meeting via electronic means.

AGENDA

- Call to order and roll call.
- Introduction of guests.
- First Period of Public Comment. The opportunity for public comment is reserved for any matter within the jurisdiction of the Board. No action on such an item may be taken by the Board unless and until the matter has been noticed as an action item. Comment from the public is limited to three minutes per person, under these items.
- Approval of agenda. (For Possible Action)
- Approval of the minutes of the regular Board meeting held February 28, 2023, and the minutes of the closed session Board meeting held February 28, 2023. (For Possible Action)
- 2. Presentation of updated Portfolio Assessment from Eric Novak, President, Praxis Consulting Group LLC. (Discussion)
- Consent Agenda. (All consent items may be approved together with a single motion, be taken out of order, and/or be heard and discussed individually. Items will be removed and considered separately at the request of the public or Board member.) (For Possible Action)

- a) Possible adoption of Resolution 23-03-01 RH approving revisions to CFP2022, CFP2023, CFP2024, and CFP 2025 Five Year Rolling Capital Fund Project Plans, and to add CFP2026 to the Five-Year Rolling Capital Fund Project Plan. (For Possible Action)
- b) Possible adoption of Resolution 23-03-02 RH approving revisions to CFP2023, CFP2024, CFP2025, and CFP 2026 Five Year Rolling Capital Fund Project Plans, and to add CFP2027 to the Five-Year Rolling Capital Fund Project Plan. (For Possible Action)
- 4. Commissioner Reports. (Discussion)
- 5. Executive Director/Secretary's Report. (Discussion)
 - A. Update on Agency activities
 - B. Update on Rental Assistance Voucher Programs / Asset Management
 - C. Update on Workforce Development, Elderly Services, and youth activities
 - D. Update on Public Affairs activities
 - E. Update on Development activities
 - F. Update on Information Technology activities
 - G. Update on MTW activities
 - H. Financials
- Discussion and possible action to renew the contract between the RHA and JF Downey Realty Consulting & Advisory Services LLC for Eviction Prevention Services for an amount not to exceed \$217,700. (For Possible Action)
- 7. Possible adoption of Resolution 23-03-03 RH approving the content and submission of the Authority's FY 2024 Moving to Work Annual plan and Certifications of Compliance to the U.S. Department of Housing and Urban Development (HUD). (For Possible Action)
- 8. Discussion on the status, funding, and related matters for proposed RHA housing development projects including, but not limited to:
 - a. Dick Scott Manor
 - b. Hawk View Apartments
 - c. Silverada Manor
 - d. John McGraw/Silver Sage Court
 - e. Stead Manor
 - f. Essex Manor
 - g. 419 10th Street
 - h. Carville Court
 - i. Paradise Plaza

(Discussion)

9. Possible adoption of Resolution 23-03-04 committing \$800,000 in RHA HUD held reserves for MTW Activity #2022-01 and \$350,000 in Washoe County ARPA grant funds for the rehabilitation of Paradise Plaza to serve as a workforce development hub. (For Possible Action)

- 10. Possible adoption of Resolution 23-03-05 committing \$1,395,201 in RHA HUD held reserves for MTW Activity #2022-01 for a total commitment of \$3,039,201 for workforce development related activities and staffing through the expiration of the current MTW contract in 2028. (For Possible Action)
- 11. Possible adoption of Resolution 23-03-06 committing \$4,650,000 in RHA HUD held reserves for MTW Activity #2021-01 for the redevelopment of Carville Court Apartments. (For Possible Action)
- 12. Possible adoption of Resolution 23-03-07 committing an amount not to exceed \$7,500,000 in RHA HUD held reserves for MTW Activity #2021-01 for the redevelopment of Hawk View Apartments. (For Possible Action)
- 13. Discussion and possible action to authorize the Executive Director to negotiate and execute a Professional Services Agreement with the selected Relocation Firm for relocation services at Hawk View Apartments in an amount not to exceed \$225,000. (For Possible Action)
- 14. Discussion and possible action to authorize the Executive Director to negotiate and execute a Professional Services Agreement with the selected Relocation Firm for relocation services at Silverada Manor in an amount not to exceed \$350,000. (For Possible Action)
- 15. Discussion and possible action to approve the Purchase and Sale Agreement (PSA) for the property located at 419 10th Street for \$775,000. (For Possible Action)
- 16. Discussion and possible direction to staff regarding the status of RHA's scattered site portfolio and potential long-term strategy for these properties. (For Possible Action)
- 17. Discussion and possible action to implement the Board approved \$9,250.00 salary increase relating to Executive Director Lopez' performance evaluation effective March 6, 2023, and the Board approved Cost of Living Adjustment (COLA) based on the April 2023 Consumer Price Index Western Information Office, West Region effective the first full pay period of July 2023. (For Possible Action)

18. Additional Items:

- i) General matters of concern to Board Members regarding matters not appearing on the agenda. (Discussion)
- ii) Reports on conferences and trainings. (Discussion)
- iii) Old and New Business. (Discussion)
- iv) Request for Future Agenda Topics (Discussion)
- v) Schedule of next meeting. The following dates have been scheduled in advance but are subject to change at any time: Tuesday, April 25, 2023; Tuesday, May 23, 2023; and Tuesday, June 27, 2023. (For Possible Action)

19. Public Comment. The opportunity for public comment is reserved for any matter within the jurisdiction of the Board. No action on such an item may be taken by the Board unless and until the matter has been noticed as an action item. Comment from the public is limited to three minutes per person.

20. Adjournment.

This meeting is accessible to the hearing impaired through the RHA TTY/TDD/voice phone line (385) 770-7166. Anyone with a disability, as defined by the Americans with Disabilities Act, requiring special assistance to participate in the meeting, may contact the Board of Commissioners at the following address, at least five days in advance of the meeting in order to make arrangements, if possible, for reasonable accommodations that would enable participation in the meeting by contacting Lindsay Dobson, Executive Administrative Assistant, Housing Authority of the City of Reno, 1525 East Ninth Street, Reno, Nevada, 89512, or by calling (775) 329-3630.

This agenda has been posted at the Housing Authority of the City of Reno Administrative Office, 1525 East Ninth Street; and further in compliance with NRS 241.020, this agenda has been posted on the official website for the Housing Authority of the City of Reno www.renoha.org and the State of Nevada Public Notification website https://www.renoha.org and the State of Nevada Public Notification website https://www.renoha.org and the State of Nevada Public Notification website

According to the provisions of NRS 241.020(5), a copy of supporting (not privileged and confidential) material provided to Board members may be obtained upon request made to: Lindsay Dobson, Executive Administrative Assistant, Housing Authority of the City of Reno, 1525 East Ninth Street, Reno, Nevada, 89512, or by calling (775) 329-3630. Copies of supporting (not privileged and confidential) material provided to Board members by staff may be obtained at the aforementioned address.

Dated March 23, 2023

By: Lindsay Dobson

Executive Administrative Assistant

Lindsaux

RENO HOUSING AUTHORITY

AGENDA ITEM NUMBER: 1 March 28, 2023

SUBJECT: Approval of the minutes of the regular Board meeting held February 28, 2023,

and the minutes of the closed session Board meeting held February 28, 2023.

(For Possible Action)

FROM: Executive Director RECOMMENDATION: For Possible Action

MINUTES OF THE REGULAR MEETING HOUSING AUTHORITY OF THE CITY OF RENO BOARD OF COMMISSIONERS February 28, 2023

The regular meeting of the Board of Commissioners of the Housing Authority of the City of Reno (Agency) was called to order by Vice Chairman Aiazzi at 12:06 pm on Tuesday, February 28, 2023 in the Agency's Boardroom.

Commissioners Present

Dave Aiazzi, Chairperson Jazzmeen Johnson, Vice Chairperson-via phone Hillary Schieve, Commissioner-via phone **Commissioners Absent**

Mark Sullivan

Staff Present Staff Absent

Hilary Lopez, Ph.D., Executive Director
Heidi McKendree, Deputy Executive Director
Ryan Russell, Legal Counsel
Linda Long, Director of Administration
Darren Squillante, Director of HR
Samantha Arellano Director of IT
Cori Fisher, Director of Resident Services
Jamie Newfelt, Director of Rental Assistance
Kristin Scott, Director of Public Housing
Kim Anhalt, Moving to Work Coordinator
April Conway, Public Affairs Officer
Lindsay Dobson, Executive Administrative Assistant

Others Present

Justin Measley-Certified Public Accountant with CliftonLarsonAllen LLP.

There being a quorum present, the order of business was as follows:

- Call to order and roll call.
- Receive introduction of guests. Justin Measley-Certified Public Accountant with CliftonLarsonAllen LLP.
- First Period of Public Comment. The opportunity for public comment is reserved for any matter within the jurisdiction of the Board. No action on such an item may be taken by the Board unless and until the matter has been noticed as an action item. Comment from the public is limited to three minutes per person, under these items.

There was no public comment.

> Approval of agenda (For Possible Action)

Commissioner Schieve motioned to approve the agenda. Vice Chairwoman Johnson seconded the motion. Hearing no further discussion, Chairman Aiazzi called for the question. The vote was all ayes, no nays. Chairman Aiazzi declared the motion carried and the agenda approved.

1. Presentation of financial audit from Justin Measley, Certified Public Accountant with CliftonLarsonAllen LLP. (Discussion)

Justin Measley provided a presentation on RHA's 2022 financial draft audit. Presentation included in packet for reference.

2. Approval of the minutes of the regular Board meeting held January 17, 2023. (For Possible Action)

Commissioner Schieve motioned to approve the minutes. Vice Chairwoman Johnson seconded the motion. Hearing no further discussion, Chairman Aiazzi called for the question. The vote was all ayes, no nays. Chairman Aiazzi declared the motion carried and the minutes approved.

3. Consent Agenda. (All consent items may be approved together with a single motion, be taken out of order, and/or be heard and discussed individually. Items will be removed and considered separately at the request of the public or Board member.) (For Possible Action)

No items.

4. Commissioner Reports. (Discussion)

No items.

5. Executive Director/Secretary's Report. (Discussion)

Executive Director Lopez reported RHA is working with HUD, the Nevada Rural Housing Authority, and other partners to host a housing choice voucher workshop for landlords. The workshop will be held on March 16, 2023, at the Innevation Center in Reno. A flyer with more information is included in the packet for reference.

Executive Director Lopez reported, in support of the Board's goal to begin asset repositioning, staff has signed contracts with Praxis Consulting Group, LLC, to assist with the processes and applications needed to submit for a RAD conversion at Silverada Manor and Section 18 Demolition/Disposition at Hawk View Apartments. Staff has already met with the Resident Advisory Board regarding RHA's asset repositioning plans and is scheduling additional resident meetings in March ahead of the required Board hearing and submittal of applications to HUD.

Executive Director Lopez reported staff is finalizing plans for an RHA property tour for elected officials. Staff hopes it will be an opportunity to provide newly elected officials and other key stakeholders information on our public housing properties, our redevelopment plans and our other programs and services as well.

B. Update on Rental Assistance Voucher Programs / Asset Management

Rental Assistance Voucher Programs

Voucher Type	Total Voucher Allocation	Vouchers Leased as of 2/1/23	Percent Leased	Vouchers Issued Not Yet Leased
Housing Choice Voucher	2,477	2,245	91%	159
VASH	416	280	67%	43
EHV	137	80	58%	31
FYI	15	5	33%	0

Number HQS Inspections Conducted by Month	
January 2023	235

Housing Choice Vouchers (HCV)

<u>Description:</u> Vouchers used by clients to lease a unit in Washoe County of their choosing. Applicants are pulled from the RHA HCV Waitlist. These vouchers also include Project Based Vouchers. The RHA has chosen to Project Base 107 of our HCV's to assist special populations obtain housing. Of the total 107 PBV units, 95 are assigned to RHA owned properties.

<u>Lease-Up Expectations:</u> Although total voucher allocation is 2524, HUD has set the agency's leasing expectation at 2382 (AKA RHA's MTW Baseline), which is the maximum leasing expectation set by HUD when RHA signed its MTW Contract. Funds provided by HUD to support the HCV program are also used to support the agency's MTW activities and therefore full lease up of all 2524 vouchers is not expected or suggested by HUD.

Veteran's Affairs Supporting Housing Vouchers (VASH)

<u>Description:</u> Vouchers allocated by HUD with an ongoing partnership with the VA to serve homeless veterans. The VA provides case management services to participants. The VA makes direct referrals to RHA of eligible clients and the RHA provides a VASH voucher. Currently, RHA has project-based 9 of these vouchers.

Emergency Housing Vouchers (EHV)

<u>Description:</u> Vouchers allocated by HÚD for the specific purpose of assisting homeless individuals or families or those at risk of homelessness in obtaining housing. RHA is partnering with four local agencies (Catholic Charities, Health Plan of Nevada, Washoe County Human Services-Our Place and Volunteers of America) that have experience providing services to this population. Referrals for the program must come from the regional Continuum of Care (CoC) coordinated entry system. Direct referrals are received by the RHA from the partnering agency and the RHA provides the EHV youcher.

Foster Youth to Independence Vouchers (FYI)

<u>Description:</u> Voucher allocated by HUD for the specific purpose of assisting foster youth aging out of the foster care system. RHA is partnering with Washoe County Human Services and Eddy House to provide referrals and case management to clients. Direct referrals are received by the RHA from the partnering agency and the RHA provides the FYI voucher.

Asset Management

- Maintenance staff continue to be busy with snow/ice removal and cleanup of fallen tree limbs due to the weight of the snow fall received. They have continued to remain focused on vacancy turns and urgent and emergency work orders in between the inclement weather storms.
 Management staff are working on file audits for all sites to ensure they are up to date and contain all necessary information.
- The Director of Asset Management attended the NSPIRE Inspection training in Oakland, California in anticipation of the new requirements being effective April 01, 2023. Once final HUD regulations are announced, management and maintenance staff will be trained on the new requirements.
- The Area Maintenance Lead scheduled a tankless water heater training courtesy of Rinnai
 company for all maintenance staff to attend during February at no charge to the Authority. This
 training will provide the maintenance team with the knowledge necessary to make repairs and
 complete required preventative maintenance on the units, as we continue to replace storage
 tank water heaters with the new tankless product.
- Public Housing ended the month of December with 12 vacancies for an overall occupancy rate of 97.75% across all sites. In January, eight residents vacated their unit, and two units were leased.
- During the month of January, two public housing residents completed the Rental Assistance briefing and transitioned to a scattered site property under the mobility program. There is one more resident that needs to go through the briefing process to fill the final mobility vacancy.
- The Essex playground improvements were completed during the month of January. The McGraw water heater replacement project continues, and the Essex water heater replacement started in January.

C. Update on Workforce Development, Elderly Services, and youth activities

Department Updates

- Staff attended the first of three Washoe County Home Consortium TRC (Technical Review Committee)
 meetings to present an overview of the Carville Court Supportive Services HOME-ARP project
 submission.
- Staff met with Nevada Rural Housing Authority and Nevada Housing Division to gain a deeper
 understanding of homeownership programs available to Nevadans. Discussions will continue with
 quarterly update meetings.
- All resident services staff attended two trainings this month:
 - LGBTQIA+ Education Training with TMCC
 - Adult Protective Services Training with ADSD

Elderly Services:

 Holy Cross Catholic Church donated a truck full of food in January which staff delivered to senior residents.

- Altrusa Reno/Sparks, Reno Gastro Project, Project 150, Katie Grace Foundation, and Black Wallstreet gathered to provide an outreach event to RHA public housing seniors. 82 seniors were provided with household items, blankets, food, puzzles, and a warm meal.
- Saint Mary's and Mobile One Docs hosted a "heart healthy" event on Valentine's Day for RHA seniors
 and persons with disabilities to learn how to keep hearts young and healthy. Over 50 seniors attended
 the event.
- RHA hosted N4 (Neighbor Network of Northern Nevada) and representatives from the Community Transportation Association of America for a Transit Planning 4 All (TP4A) listening session. Chosen RHA seniors and staff participated in the session to share their experiences with barriers regarding transportation for seniors/persons with disabilities.

Workforce Development

- Over 20 residents attended RHA's first Homeownership workshop, with many asking for another
 opportunity. First Independent Bank is providing residents with a workshop in March titled, "Building
 Your Credit to Buy a Home."
- 18 residents signed up for the Workforce Development program in January alone. Staff is working to create additional innovative recruitment tools.
- Start Smart scholarship applications are due March 31st. All Start Smart graduates will be invited to the inaugural RHA Scholarship Awards Dinner in June, where the scholarships will be presented.

Youth/Family Activities

- RHA is partnering with the Ballroom of Reno to offer weekly dance classes to youth at Essex Manor starting in April.
- RHA is partnering with **Note-Able Music Therapy** to offer music classes at Hawk View and Mineral Manor, once a week for 8 weeks starting in March.
- **Sierra Nevada Journey's** Summer Camp registration opened to residents on Monday, February 27th. RHA is thrilled to have received 55 scholarships this year.

Resident Councils

- Hawk View's garden committee completed an area sketch and is getting ready to get to work in March.
 Urban Roots will be joining residents and staff on March 11th to build garden beds.
- Tom Sawyer resident council hosted a luncheon on February for residents of Tom Sawyer and Silverada to encourage senior socialization.

D. Update on Public Information Activities

Opportunity Knocks Magazine

• In final editing stage. With senior leadership for their edits.

Website Revamp

• Continued meetings with and content submission to Maslow Creative.

Educational Mini-Videos

^{*} The Authority's community partners are designated in bold within the Update on Elderly Services, Workforce Development, and youth activities headers.

- Revamping to ensure they are accessible to blind/deaf patrons
- Created training for all RHA employees to ensure consistent messaging on RHA activities and mission.

Social Media, Commercial Media, Other

- Wrote strategic communications plan for PH repositioning. Creating collateral items for residents, social, media talking points, and social posts
- Continuing other collateral items
- Responded to Washington Post reporter regarding security cameras at public housing sites
- Finalized February employee newsletter
- Provided initial list/coordination plans for Celebrity Homes Tour for April for elected officials, board of commissioners, and RHA executive staff
- While a high number followers/likes are not the goal of social media (engagement and messaging is the goal), in the past 20 months, our Facebook presence has grown from 142 likes/followers to 1,427. We created Twitter and Instagram from scratch and are continually adding followers, 84 and 462 respectively.

E. Update on Development Activities

- **(CF2021) McGraw Ct. HVAC Replacement:** Mt. Rose Heating and Airconditioning Inc. (\$304,000.00). Bids were opened December 16, 2022. The contract for this project was signed on January 26, 2023. Contractor is waiting on long lead items prior to signing a notice to proceed.
- **(OPS) Dick Scott Manor Project:** The design phase of the project was completed with plans submitted to the City of Reno for comment and plan review. RHA has received the final GMP from the general contractor (Plenium Builders) with 100% of bids received. The final construction contract and Notice to Proceed (NTP) is scheduled for March 2023.
- (CF2020) John McGraw Court Water Heater Replacement: Michael's Plumbing (\$141,909.00).
 A notice to proceed was issued December 5, 2022. Michael's Plumbing has completed installing 25 of the 33 water heaters under contract. The project is proceeding smoothly and should be substantially complete March 2023.
- (CF 2020) Essex Manor Water Heater Replacement: Simerson Construction (\$630,081.00). A notice to proceed was issued January 9, 2023. Simerson has completed 59 of the 100 water heaters under contract. The project is proceeding smoothly and is expected to be completed late April 2023.
- **(CF2021) Stead Manor Concrete and Pavement Replacement:** Spanish Springs Construction (\$598,000.00). The contract for this project was signed on December 16, 2022. The project will not start until asphalt plants re-open in the spring of 2023.
- (CF 2021) Myra Birch Manor Video Surveillance System: 295 Cabling (\$73,840.00). Contract signing was December 8, 2022. Contractor is waiting on long lead items prior to signing a notice to proceed.
- (CF2021) Stead Manor Video Surveillance System: 295 Cabling (\$79,250.00)
 Contract signing was December 8, 2022. Contractor is waiting on long lead items prior to signing a notice to proceed.

• (OPS) 419 10th St. Sparks, NV 15 Unit Apartment Complex: A Letter of Intent (LOT % 45 16 10 vered to the selling partners of the property October 31, 2022. The LOI was executed by the seller and returned to RHA November 8, 2022. Escrow was opened on the property November 11, 2022. RHA is in the process of providing a purchase and sales agreement for review by the owner. The City of Sparks has initiated an Environmental Assessment on the property.

F. Update on Information Technology activities

Electronic Document Management System

- 2/24/2023: All folder structures have been configured in the production environment.
- 2/24/2023: Staff continues to scan Rental Assistance files into the production environment
 - o 1314 out of approx. 2500 client files have been scanned
 - All files will be scanned within 11 months at current scan rate
- 2/24/2023: Physical file prepping and scanning into Laserfiche on hold for the Asset Management Department due to staff turnover in IT. Work on this project is expected to resume in March 2023.

Yardi

- 2/24/2023: Staff has begun Yardi online training.
- 2/24/2023: Staff will begin the 1st of 5 on-site Yardi-led trainings on 2/28/2023.

2/24/2023: Yardi Voyager (PHA Software) configuration for financials, Rental Assistance, Asset Management, and Admissions continues.

G. Update on MTW Activities

FY 2024 Annual MTW Plan

RHA's FY 2024 Annual MTW Plan has been drafted and posted for public comment. Staff attended several Resident Council meetings to provide an overview of the proposed activities and their effect on current Public Housing residents. A public hearing to answer questions or receive comments on the proposed MTW Annual Plan, which includes a Rental Assistance Demonstration Program and Section 18 Repositioning Amendment, will be held on March 2, 2023.

In FY 2024, RHA is proposing the following new MTW Plan activities:

- Time-Limited Workforce Development Vouchers
 RHA is proposing to establish a partnership referral program that would allow the agency to provide time-limited housing assistance to clients referred by one of RHA's non-profit partners.
- Local Project Based Voucher Program
 RHA is implementing several activities surrounding Project Based Vouchers. With this activity, RHA is proposing to consolidate each of these activities into one Local Project Based Voucher Program activity.

Furthermore, in FY 2024, RHA is proposing to amend the following MTW activities prayiously proved by HUD and implemented by the agency:

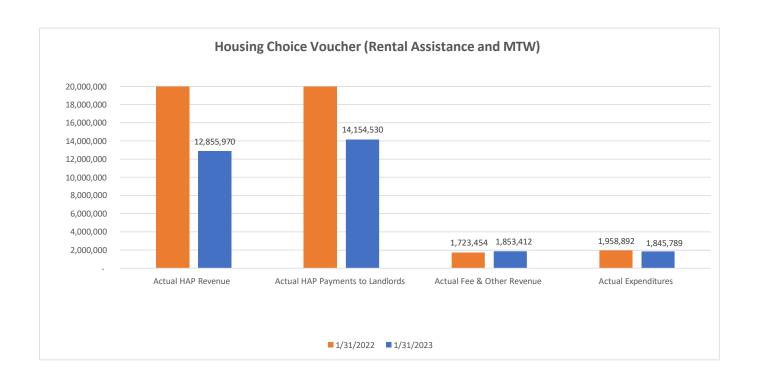
- Simplify rent calculations and increase the minimum rent
 In 2014, RHA raised the minimum rent from \$50 to \$75 to save HCV HAP expense and PH operating subsidy. Based on current rental market conditions, RHA proposes to increase the minimum rent in FY 2024 to \$100.
- Landlord Incentive Program
 RHA will amend this activity to allow for an automatic payment of the second month and to change the payment amount to the landlord to the actual contract rent amount rather than the HAP payment amount. In addition, to provide more of an incentive to landlords who lease to RHA's HCV participants, RHA is proposing to implement a re-lease bonus and a landlord referral bonus.
- Redetermination of rent reasonableness as a result of a change in contract rent RHA will continue to waive the requirement for rent reasonableness determinations provided that the new requested rent amount is a change of 10% or less but proposes to automatically approve requests that are at or below the current payment standard.

H. Financials

Public Housing	1/31/2023	1/31/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual Revenue	2,766,788	2,633,255	133,533	5.07%
Budgeted Revenue	2,723,489	2,681,917	41,573	1.55%
Actual Expenditures	3,101,424	2,862,449	238,975	8.35%
Budgeted Expenditures	3,316,658	2,806,598	510,060	18.17%
Actual Surplus (deficit)	(334,636)	(229,194)	(105,443)	46.01%



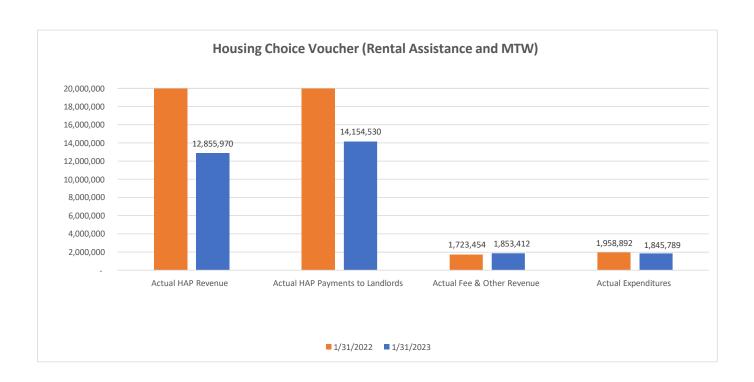
Housing Choice Voucher (Rental Assistance and MTW)	1/31/2023	1/31/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual HAP Revenue	12,855,970	22,134,296	(9,278,326)	-41.92%
Budgeted HAP Revenue	14,929,019	23,021,991	(8,092,972)	-35.15%
Actual HAP Payments to Landlords	14,154,530	21,707,675	(7,553,145)	-34.79%
Budgeted HAP Payments to Landlords	14,714,534	22,618,704	(7,904,169)	-34.95%
Actual Fee & Other Revenue	1,853,412	1,723,454	129,958	7.54%
Budgeted Fee & Other Revenue	1,559,013	1,984,592	(425,580)	-21.44%
Actual Expenditures	1,845,789	1,958,892	(113,103)	-5.77%
Budgeted Expenditures	1,979,876	2,098,081	(118,205)	-5.63%
Actual Surplus (deficit)	(1,290,938)	191,183	(1,482,121)	-775.24%



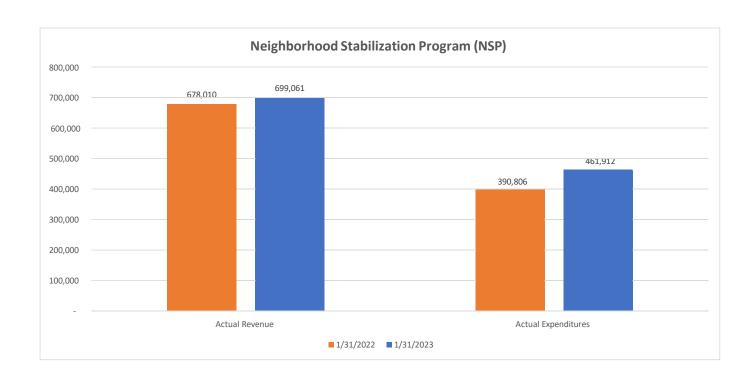
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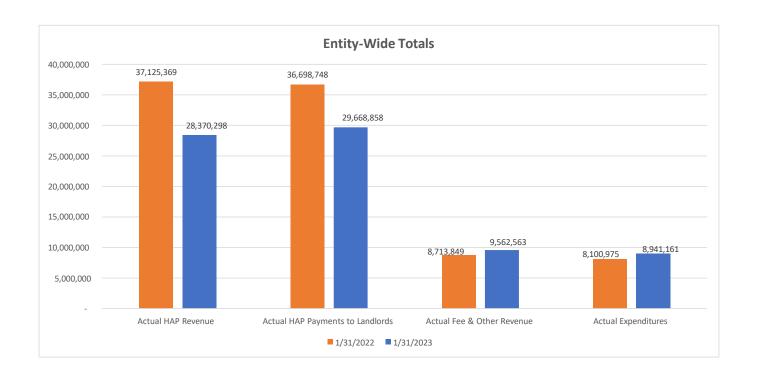
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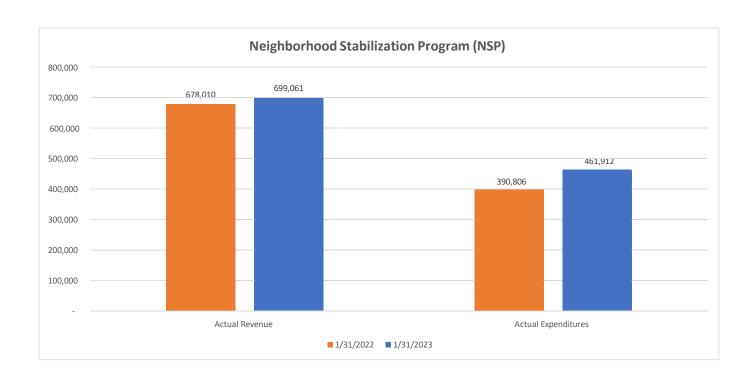
Neighborhood Stabilization Program (NSP)	1/31/2023	1/31/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual Revenue	699,061	678,010	21,051	3.10%
Budgeted Revenue	696,620	654,341	42,279	6.46%
Actual Expenditures	461,912	390,806	71,106	18.19%
Budgeted Expenditures	401,188	403,896	(2,709)	-0.67%
Actual Restricted Surplus (deficit)	237,149	287,204	(50,055)	-17.43%



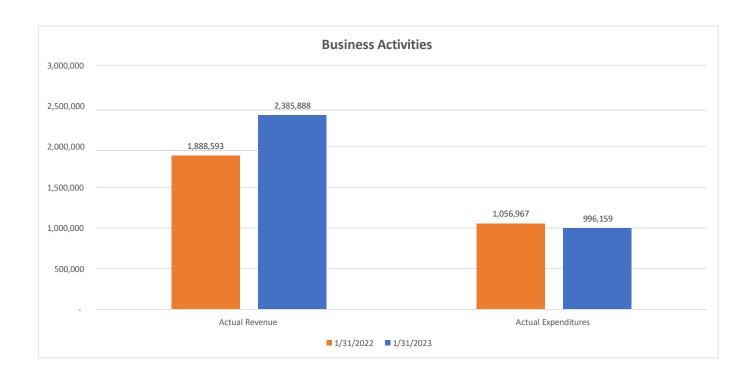
Entity-Wide Totals	1/31/2023	1/31/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual HAP Revenue	28,370,298	37,125,369	(8,755,071)	-23.58%
Budgeted HAP Revenue	29,942,438	38,559,282	(8,616,844)	-22.35%
Actual HAP Payments to Landlords	29,668,858	36,698,748	(7,029,890)	-19.16%
Budgeted HAP Payments to Landlords	29,727,954	38,155,995	(8,428,041)	-22.09%
HAP Surplus (Deficit)	(1,298,560)	426,621	(1,725,181)	-404.38%
Actual Fee & Other Revenue	9,562,563	8,713,849	848,713	9.74%
Budgeted Fee & Other Revenue	9,361,637	8,852,214	509,423	5.75%
Actual Expenditures	8,941,161	8,100,975	840,186	10.37%
Budgeted Expenditures	9,376,429	8,027,191	1,349,238	16.81%
Unrestricted Profit (Loss)	621,401	612,874	8,527	1.39%
Actual Surplus (deficit)	(677,158)	1,039,495	(1,716,654)	-165.14%



Neighborhood Stabilization Program (NSP)	1/31/2023	1/31/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual Revenue	699,061	678,010	21,051	3.10%
Budgeted Revenue	696,620	654,341	42,279	6.46%
Actual Expenditures	461,912	390,806	71,106	18.19%
Budgeted Expenditures	401,188	403,896	(2,709)	-0.67%
Actual Restricted Surplus (deficit)	237,149	287,204	(50,055)	-17.43%



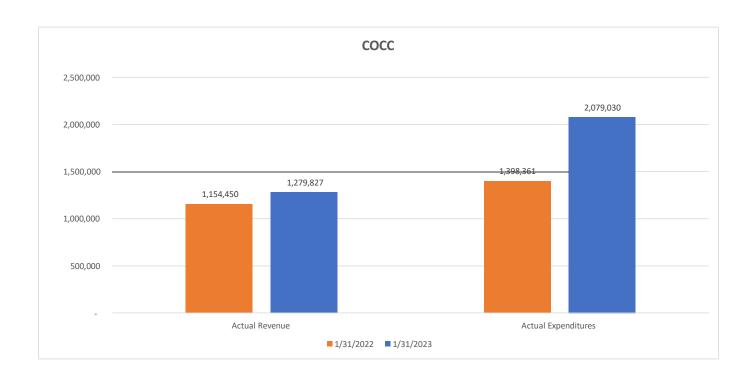
Business Activities	1/31/2023	1/31/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual Revenue	2,385,888	1,888,593	497,295	26.33%
Budgeted Revenue	2,390,196	1,880,452	509,744	27.11%
Actual Expenditures	996,159	1,056,967	(60,808)	-5.75%
Budgeted Expenditures	1,003,971	1,231,451	(227,480)	-18.47%
Actual Unrestricted Surplus (deficit)	1,389,729	831,625	558,104	67.11%



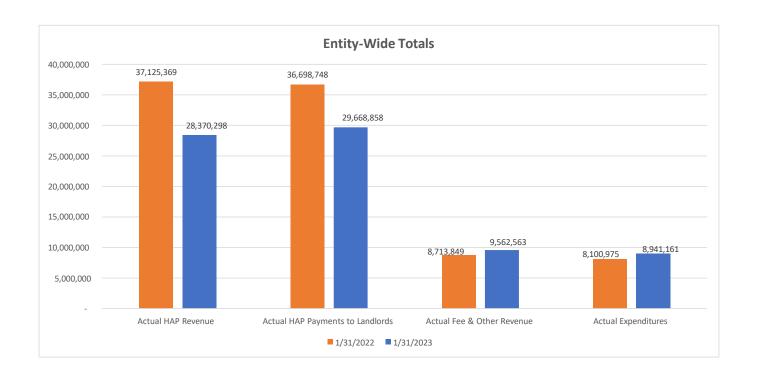
Washoe Affordable Housing (WAHC)	1/31/2023	1/31/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual HAP Revenue	15,514,328	14,991,073	523,255	3.49%
Budgeted HAP Revenue	15,013,419	15,537,291	(523,872)	-3.37%
Actual HAP Payments to Landlords	15,514,328	14,991,073	523,255	3.49%
Budgeted HAP Payments to Landlords	15,013,419	15,537,291	(523,872)	-3.37%
HAP Surplus (Deficit)	-	-	-	0.00%
Actual Admin and Fee Revenue	577,588	636,088	(58,500)	-9.20%
Budgeted Admin and Fee Revenue	602,592	517,636	84,956	16.41%
Actual Expenditures	456,846	433,500	23,346	5.39%
Budgeted Expenditures	412,742	393,232	19,510	4.96%
Unrestricted Profit (Loss)	120,742	202,588	(81,846)	-40.40%
Actual compared to budget	120,742	202,588	(81,846)	-40.40%



cocc	1/31/2023	1/31/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual Revenue	1,279,827	1,154,450	125,376	10.86%
Budgeted Revenue	1,389,728	1,133,277	256,451	22.63%
Actual Expenditures	2,079,030	1,398,361	680,669	48.68%
Budgeted Expenditures	2,261,994	1,093,933	1,168,061	106.78%
Actual Unrestricted Surplus (deficit)	(799,204)	(243,911)	(555,293)	227.66%



Entity-Wide Totals	1/31/2023	1/31/2023 1/31/2022		Variance Percentage
Actual HAP Revenue	28,370,298	37,125,369	(8,755,071)	-23.58%
Budgeted HAP Revenue	29,942,438	38,559,282	(8,616,844)	-22.35%
Actual HAP Payments to Landlords	29,668,858	36,698,748	(7,029,890)	-19.16%
Budgeted HAP Payments to Landlords	29,727,954	38,155,995	(8,428,041)	-22.09%
HAP Surplus (Deficit)	(1,298,560)	426,621	(1,725,181)	-404.38%
Actual Fee & Other Revenue	9,562,563	8,713,849	848,713	9.74%
Budgeted Fee & Other Revenue	9,361,637	8,852,214	509,423	5.75%
Actual Expenditures	8,941,161	8,100,975	840,186	10.37%
Budgeted Expenditures	9,376,429	8,027,191	1,349,238	16.81%
Unrestricted Profit (Loss)	621,401	612,874	8,527	1.39%
Actual Surplus (deficit)	(677,158)	1,039,495	(1,716,654)	-165.14%



6. Discussion and possible action to authorize the Executive Director to negotiate⁰and execute a no cost Interlocal Agreement between RHA and the Division of Welfare and Supportive Services. (For Possible Action)

Commissioner Schieve motioned to approve the Executive Director to negotiate and execute a no cost Interlocal Agreement between RHA and the Division of Welfare and Supportive Services. Vice Chairwoman Johnson seconded the motion. Hearing no further discussion, Chairman Aiazzi called for the question. The vote was all ayes, no nays. Chairman Aiazzi declared the motion carried.

7. Discussion and possible action for Approval of a construction contract between the City of Reno Housing Authority and Plenium Builders for construction of Dick Scott Manor for a Gross Maximum Price of \$4,009,428.00. (For Possible Action)

Vice Chairwoman Johnson motioned to approve a construction contract between the City of Reno Housing Authority and Plenium Builders for construction of Dick Scott Manor for gross maximum price not to exceed \$3,995,444 and authorize the Executive Director to finalize and execute a contract for that project in a form acceptable to Housing Authority and Counsel.

8. Discussion and possible action to approve new rent setting policies for unaided and NSP properties. (For Possible Action)

Commissioner Schieve motioned to approve the item as presented with direction to staff to bring back the information on what the rent increases would be by the end of a four year goal. Vice Chairwoman Johnson seconded the motion. Hearing no further discussion, Chairman Aiazzi called for the question. The vote was all ayes, no nays. Chairman Aiazzi declared the motion carried.

9. Discussion and possible action to approve a new flat rent for public housing. (For Possible Action)

Deputy Executive Director McKendree informed the Board the new flat rent policy would be implemented with the new MTW plan which is set to come back for Board approval in March.

There were no questions or discussion.

10. Discussion and possible action to solicit a lobbyist for the State of Nevada 2023
Legislative Session. Discussion may include without limitation an update on the Nevada
Housing Coalition legislative priorities and/or support for housing legislation. (For
Possible Action)

Thoughtful and intelligent conversations took place regarding the State of Nevada 2023 Legislative Session. The Board agreed Executive Director Lopez was permitted to testify on bills that have a positive impact or bring additional revenue to the Housing Authority. It was decided not to solicit a lobbyist at this time.

11. Discussion and possible action to modify the current meeting schedule to accommodate potential City and County elected officials and liaisons. (For Possible Action)

The Board agreed to discuss modifications to the current meeting schedule once a new commissioner is appointed by city council.

12. Discussion and possible action on the City of Reno's proposed Stormwater Utility Fee, RHA's submitted comments, and direction to staff on this matter. (For Possible Action)

Thoughtful and intelligent conversations took place regarding the City of Reno's proposed Stormwater Utility Fees.

13. Closed Session: Discussion on 1) the status of the Bonanza Inn and potential acquisition of the property, through possible use of eminent domain or otherwise, for subsequent development of low income and/or workforce housing using City of Reno American Rescue Plan Act (ARPA) and other sources and 2) City of Reno's response to RHA's request to use of ARPA funds allotted to the Bonanza for the proposed Carville Court Supportive Housing redevelopment project and the Essex Manor public housing rehabilitation project. See Op. Nev. Att'y Gen. No. 372 (December 29, 1966). (Discussion)

Staff entered closed session at 1:10 pm. Staff returned from closed session at 1:47 pm.

14. Open Session: Discussion and possible action to provide direction to Staff on 1) the status of the Bonanza Inn and potential acquisition of the property, through possible use of eminent domain or otherwise, for subsequent development of low income and/or workforce housing using City of Reno American Rescue Plan Act (ARPA) and other sources and 2) City of Reno's response to RHA's request to use of ARPA funds allotted to the Bonanza for the proposed Carville Court Supportive Housing redevelopment project and the Essex Manor public housing rehabilitation project and direction to staff on these items. (For Possible Action)

Legal Counsel Russell stated for the record that this item in open session immediately follows a closed session aimed at the discussion of the acquisition of the Bonanza Inn. As the Board will remember, it has provided previous direction to staff to acquire the Bonanza Inn in conjunction with Reno City Council's award of ARPA funds in the amount of \$6 million. That direction stands and unless the Board would like to alter that direction, staff has standing direction to pursue acquisition of the Bonanza Inn which is in probate. In doing so staff continues to have direction to do what it can to acquire and use the \$6 million of ARPA funds allocated to this project by the city of Reno. Staff have been advised by Legal Counsel Russell that acquisition can be accomplished through bids in the probate, private sale or exercise of eminent domain which is available to the Housing Authority.

Commissioner Schieve motioned to affirm prior direction to staff to proceed with acquisition of the Bonanza Inn through the use of allocated ARPA funds by the city of Reno. That proceeding will include staff following up with both staff at the city of Reno, Reno City Council as well as the probate estate. Vice Chairwoman Johnson seconded the motion. Hearing no further discussion, Chairman Aiazzi called for the question. The vote was all ayes, no nays. Chairman Aiazzi declared the motion carried.

15. Discussion and updates on expanding Resident Services Programs (Discussion)

Director of Resident Services Fisher provided a brief overview of the services and program offered through the Housing Authority.

16. Discussion and possible action on the Performance Evaluation of Hilary Lopez, RHA Executive Director, to consider her job performance, professional competence, character, and any alleged misconduct within the context of her performance. Discussion and possible action may include approval of an evaluation rating as well as any recommendation on the compensation and consideration provided to Dr. Lopez, which will be subject to her acceptance or rejection of the same. (For Possible Action)

Commissioner Schieve motioned to approve the exemplary evaluation of Executive Director Lopez with direction to Chairman Aiazzi to present the financial terms up to 5% on top of the Cost of Living Adjustment (COLA) and bring back for ratification, including effective dates, at the March Board meeting. Vice Chairwoman Johnson seconded the motion. Hearing no further discussion, Chairman Aiazzi called for the question. The vote was all ayes, no nays. Chairman Aiazzi declared the motion carried.

17. Additional items:

- i) General matters of concern to Board Members regarding matters not appearing on the agenda. (Discussion)
- ii) Reports on conferences and trainings. (Discussion)

There were no conferences or trainings discussed.

iii) Old and New Business. (Discussion)

Commissioner Schieve would like to include staff surveys as part of the Executive Director's evaluation going forward.

- iv) Request for Future Agenda Topics
- v) Schedule of next meeting. The following dates have been scheduled in advance but are subject to change at any time: Tuesday, March 28, 2023; Tuesday, April 25, 2023; and Tuesday, May 23, 2023. (For Possible Action)
- 18. Public Comment. The opportunity for public comment is reserved for any matter within the jurisdiction of the Board. No action on such an item may be taken by the Board unless and until the matter has been noticed as an action item. Comment from the public is limited to three minutes per person.

There was no public comment.

15. Adjournment. (For Possible Action)

The meeting adjourned at 2:24 pm.

RENO HOUSING AUTHORITY

AGENDA ITEM NUMBER: 2 March 28, 2023

SUBJECT: Presentation of updated Portfolio Assessment from Eric Novak, President,

Praxis Consulting Group LLC. (Discussion)

FROM: Executive Director RECOMMENDATION: Discussion

Attached is the *Reno Housing Authority Portfolio Assessment Update* prepared by Praxis Consulting Group, LLC.

RENO HOUSING AUTHORITY

AGENDA ITEM NUMBER: 3 March 28, 2023

SUBJECT: Consent Agenda. (All consent items may be approved together with a single motion, be taken out of order, and/or be heard and discussed individually.

Items will be removed and considered separately at the request of the public

or Board member.)

FROM: Executive Director RECOMMENDATION: For Possible Action

 a) Possible adoption of Resolution 23-03-01 RH approving revisions to CFP2022, CFP2023, CFP2024, and CFP 2025 Five Year Rolling Capital Fund Project Plans, and to add CFP2026 to the Five-Year Rolling Capital Fund Project Plan. (For Possible Action)

As is customary each year after we receive our annual CFP award, we update the remaining years of the 5-year action plan to be equal to the most recent award granted in this case, \$2,106,129.

Asset Management, Development, Finance, and the remainder of the executive team closely examined the existing 2022 – 2026 5-year plan and discussed the upcoming asset repositioning projects, and determined that it would be in the best interest of the RHA to allocate funds to support the relocation and construction activities at Hawk View, Silverada Manor, and Stead Manor early in the 5-year period and to address capital needs at remaining Public Housing properties focusing on safety concerns and unit and site maintenance. Additionally, we have extended the plan by one year into 2026.

b) Possible adoption of Resolution 23-03-02 RH approving revisions to CFP2023, CFP2024, CFP2025, and CFP 2026 Five Year Rolling Capital Fund Project Plans, and to add CFP2027 to the Five-Year Rolling Capital Fund Project Plan. (For Possible Action)

As is customary each year after we receive our annual CFP award, we update the remaining years of the 5-year plan to be equal to the most recent award granted in this case, \$2,106,129.

Asset Management, Development, Finance, and the remainder of the executive team closely examined the existing 2023 – 2027 5-year plan and discussed the upcoming asset repositioning projects, and determined that it would be in the best interest of the RHA to allocate funds to support the relocation and construction activities at Hawk View, Silverada Manor, and Stead Manor early in the 5-year period and to address capital needs at remaining Public Housing properties focusing on safety concerns and unit and site maintenance. Additionally, we have extended the plan by one year into 2027.

RENO HOUSING AUTHORITY PROPOSED 5 YEAR PLAN 2022-2026

YEAR 1, FY 2022		YEAR 2, FY 2023		YEAR 3, FY 2024		YEAR 4, FY 2025		YEAR 5, FY 2026	
2022-2026 NOT IN EPIC		2022-2026 NOT IN EPIC	F	2022-2026 NOT IN EPIC	F 1	2022-2026 NOT IN E		2021-2026 NOT IN EPIC	
Dev. Number/Name Major Work Category		Dev. Number/Name Major Work Category		Dev. Number/Name Major Work Category	Estimated Costs	Dev. Number/Name Major Work Category	Estimated Costs	Dev. Number/Name Major Work Category	Estimated Costs
			COSES						Costs
NV39-P001-001: MINERAL MANOR		NV39-P001-001: MINERAL MANOR		NV39-P001-001: MINERAL MANOR		NV39-P001-001: MINERAL MANOR		NV39-P001-001: MINERAL MANOR	
				Accessible Entry	40,000				
				Tree Trimming	45,317				
						Street Repavement	220,000		
NV39-P001-001: Mineral Manor Total	-	NV39-P001-001: Mineral Manor Total	-	NV39-P001-001: Mineral Manor Total	85,317	NV39-P001-001: Mineral Manor Total	- 220,000	NV39-P001-001: Mineral Manor Total	-
NV39-P001-002: TOM SAWYER VILLAGE		NV39-P001-002: TOM SAWYER VILLAGE		NV39-P001-002: TOM SAWYER VILLAGE		NV39-P001-002: TOM SAWYER VILLAGE	·	NV39-P001-002: TOM SAWYER VILLAGE	
				Landscape Improvements	35,000				
				Parking Lot Repairs	42,000				
				Appliance Replacement	30,000		202 202		
						Concrete Repair	200,000		
						Exterior Painting	60,000		
NV39-P001-002: Tom Sawyer Total	-	NV39-P001-002: Tom Sawyer Total	-	NV39-P001-002: Tom Sawyer Total	107,000	NV39-P001-002: Tom Sawyer Total	260,000	NV39-P001-002: Tom Sawyer Total	-
NV39-P001-003: SILVERADA MANOR		NV39-P001-003: SILVERADA MANOR		NV39-P001-003: SILVERADA MANOR		NV39-P001-003: SILVERADA MANOR		NV39-P001-003: SILVERADA MANOR	
Relocation	827,000								
		Replacement Reserves	348,430						
Predevelopment Activities	100,000								
NV39-P001-003: Silverada Total	927,000	NV39-P001-003: Silverada Total	348,430	NV39-P001-003: Silverada Total	-	NV39-P001-003: Silverada Total	-	NV39-P001-003: Silverada Total	-
NV39-P001-006: STEAD MANOR		NV39-P001-006: STEAD MANOR		NV39-P001-006: STEAD MANOR		NV39-P001-006: STEAD MANOR		NV39-P001-006: STEAD MANOR	
				Relocation	527,771				
				Predevelopment Activities	100,000				
				·	,				
NV39-P001-006: Stead Total	-	NV39-P001-006: Stead Total	-	NV39-P001-006: Stead Total	627,771	NV39-P001-006: Stead Total	-	NV39-P001-006: Stead Total	-
NV39-P001-007:HAWK VIEW APTS.		NV39-P001-007:HAWK VIEW APTS.		NV39-P001-007:HAWK VIEW APTS.		NV39-P001-007:HAWK VIEW APTS.		NV39-P001-007:HAWK VIEW APTS.	
Polocation	217 201	Poplacement Percentes	219,459						
Relocation Prodovolonment Activities		Replacement Reserves							
Predevelopment Activities	100,000	Relocation	866,401						
1		I		I		I		I	

RENO HOUSING AUTHORITY PROPOSED 5 YEAR PLAN 2022-2026

YEAR 1, FY 2022 2022-2026 NOT IN EPIC		YEAR 2, FY 2023 2022-2026 NOT IN EPIC		YEAR 3, FY 2024 2022-2026 NOT IN EPIC		YEAR 4, FY 2025 2022-2026 NOT IN EP	IC	YEAR 5, FY 2026 2021-2026 NOT IN EPIC	:
Dev. Number/Name Major Work Category		Dev. Number/Name Major Work Category		Dev. Number/Name Major Work Category	Estimated Costs	Dev. Number/Name Major Work Category	Estimated Costs	Dev. Number/Name Major Work Category	Estimated Costs
NV39-P001-007: Hawkview Total		NV39-P001-007: Hawkview Total		NV39-P001-007: Hawkview Total	-	NV39-P001-007: Hawkview Total	-	NV39-P001-007: Hawkview Total	-
NV39-P001-009: ESSEX MANOR		NV39-P001-009: ESSEX MANOR		NV39-P001-009: ESSEX MANOR		NV39-P001-009: ESSEX MANOR		NV39-P001-009: ESSEX MANOR	
						Lighting Upgrades Asphalt Repair and Sealing	45,000 58,343		
NV39-P001-009 Essex Total	-	NV39-P001-009 Essex Total		NV39-P001-009 Essex Total	-	NV39-P001-009 Essex Total	103,343	NV39-P001-009 Essex Total	
NV39-P001-010: MYRA BIRCH MANOR		NV39-P001-010: MYRA BIRCH MANOR		NV39-P001-010: MYRA BIRCH MANOR		NV39-P001-010: MYRA BIRCH MANOR		NV39-P001-010: MYRA BIRCH MANOR	
Appliance Repair Dumpster Enclosures	50,000 40,000					Siding Repair	250,000	Lighting Asphalt Sealing Exterior Painting Playground Equipment	75,000 75,000 330,000 150,000
NV39-P001-010 Myra Birch Total	90,000	NV39-P001-010 Myra Birch Total	-	NV39-P001-010 Myra Birch Total	-	NV39-P001-010 Myra Birch Total	250,000	NV39-P001-010 Myra Birch Total	630,000
NV39-P001-018: McGRAW COURT		NV39-P001-018: McGRAW COURT		NV39-P001-018: McGRAW COURT		NV39-P001-018: McGRAW COURT		NV39-P001-018: McGRAW COURT	
				Relocation	156,578			Replacement Reserves	203,343
NV39-P001-018: McGraw Total	-	NV39-P001-018: McGraw Total	-	NV39-P001-018: McGraw Total	156,578	NV39-P001-018: McGraw Total	-	NV39-P001-018: McGraw Total	203,343
TOTAL PHYSICAL IMPROVEMENTS	1,434,291	TOTAL PHYSICAL IMPROVEMENTS	1,434,290	TOTAL PHYSICAL IMPROVEMENTS	976,666	TOTAL PHYSICAL IMPROVEMENTS	833,343	TOTAL PHYSICAL IMPROVEMENTS	833,343
ADMINISTRATION #1410 UP TO 10%	210,613	ADMINISTRATION #1410 UP TO 10%	210,613	ADMINISTRATION #1410 UP TO 10%	142,381	ADMINISTRATION #1410 UP TO 10%	121,906	ADMINISTRATION #1410 UP TO 10%	121,906
MANAGEMENT IMP #1408 UP TO 10%	-	MANAGEMENT IMP #1408 UP TO 10%	-	MANAGEMENT IMP #1408 UP TO 10%		MANAGEMENT IMP #1408 UP TO 10%		MANAGEMENT IMP #1408 UP TO 10%	
OPERATION #1406 UP TO 20%	421,225	OPERATION #1406 UP TO 20%	421,226	OPERATION #1406 UP TO 20%	284,762	OPERATION #1406 UP TO 20%	243,812	OPERATION #1406 UP TO 20%	243,812
NON DWELLING EQUIPMENT	40,000	NON DWELLING EQUIPMENT	40,000	NON DWELLING EQUIPMENT	20,000	NON DWELLING EQUIPMENT	20,000	NON DWELLING EQUIPMENT	20,000
TOTAL SOFT (ADMIN) COSTS	671,838	TOTAL SOFT (ADMIN) COSTS	671,839	TOTAL SOFT (ADMIN) COSTS	447,143	TOTAL SOFT (ADMIN) COSTS	385,719	TOTAL SOFT (ADMIN) COSTS	385,719

RENO HOUSING AUTHORITY PROPOSED 5 YEAR PLAN 2022-2026

YEAR 1, FY 2022 2022-2026 NOT IN EPIC		YEAR 2,FY 2023 2022-2026 NOT IN EPIC		YEAR 3,FY 2024 2022-2026 NOT IN EPIC		YEAR 4, FY 2025 2022-2026 NOT IN EPIC		YEAR 5, FY 2026 2021-2026 NOT IN EPIC	
Dev. Number/Name	Estimated	Dev. Number/Name	Estimated	Dev. Number/Name	Estimated	Dev. Number/Name	Estimated	Dev. Number/Name	Estimated
Major Work Category	Costs	Major Work Category	Costs	Major Work Category	Costs	Major Work Category	Costs	Major Work Category	Costs
Award Amount:	2,106,129	Award Amount:	2,106,129	Award Amount:	1,423,809	Award Amount:	1,219,062	Award Amount:	1,219,062
Budgeted:	2,106,129	Budgeted:	2,106,129	Budgeted:	1,423,809	Budgeted:	1,219,062	Budgeted:	1,219,062

RENO HOUSING AUTHORITY PROPOSED 5 YEAR PLAN 2023-2027

YEAR 1, FY 2023 2023-2027 NOT IN EPIC		YEAR 2,FY 2024 2023-2027 NOT IN EPIC		YEAR 3, FY 2025		YEAR 4, FY 2026		YEAR 5, FY 2027	
				2023-2027 NOT IN EPIC		2023-2027 NOT IN EPIC	T	2023-2027 NOT IN EPIC	
Dev. Number/Name		Dev. Number/Name	Estimated	Dev. Number/Name	Estimated	Dev. Number/Name	Estimated	Dev. Number/Name	Estimated
Major Work Category	Costs	Major Work Category	Costs	Major Work Category	Costs	Major Work Category	Costs	Major Work Category	Costs
NV39-P001-001: MINERAL MANOR		NV39-P001-001: MINERAL MANOR		NV39-P001-001: MINERAL MANOR		NV39-P001-001: MINERAL MANOR		NV39-P001-001: MINERAL MANOR	
		Accessible Entry	40,000	Street Repavement	220,000			Air Conditioning Units	483,343
		Tree Trimming	45,317						
NV39-P001-001: Mineral Manor Total	-	NV39-P001-001: Mineral Manor Total	85,317	NV39-P001-001: Mineral Manor Total	220,000	NV39-P001-001: Mineral Manor Total	-	NV39-P001-001: Mineral Manor Total	483,343
NV39-P001-002: TOM SAWYER VILLAGE		NV39-P001-002: TOM SAWYER VILLAGE		NV39-P001-002: TOM SAWYER VILLAGE		NV39-P001-002: TOM SAWYER VILLAGE		NV39-P001-002: TOM SAWYER VILLAGE	
		Landscape Improvements		Concrete Repair	200,000				
		Parking Lot Repairs	42,000	Exterior Paint	60,000				
		Appliance Replacement	30,000						
NV39-P001-002: Tom Sawyer Total	-	NV39-P001-002: Tom Sawyer Total	107,000	NV39-P001-002: Tom Sawyer Total	260,000	NV39-P001-002: Tom Sawyer Total	-	NV39-P001-002: Tom Sawyer Total	-
NV39-P001-003: SILVERADA MANOR		NV39-P001-003: SILVERADA MANOR		NV39-P001-003: SILVERADA MANOR		NV39-P001-003: SILVERADA MANOR		NV39-P001-003: SILVERADA MANOR	
Replacement Reserves	348,430								
	, , , , ,								
NV39-P001-003: Silverada Total	348,430	NV39-P001-003: Silverada Total	-	NV39-P001-003: Silverada Total	-	NV39-P001-003: Silverada Total	-	NV39-P001-003: Silverada Total	-
NV39-P001-006: STEAD MANOR		NV39-P001-006: STEAD MANOR		NV39-P001-006: STEAD MANOR		NV39-P001-006: STEAD MANOR		NV39-P001-006: STEAD MANOR	
		Relocation	527,771						
		Predevelopment Activities	100,000						
W// 100 100 100 100 100 100 100 100 100 1		NIV20 DO04 DO4 St. 17 17	,			NIV. 20 20 4 20 4 5 4 5 4 5 4 5 4 5 4 5 4 5 4 5 4 5 4		Luxua 2004 204 54 17 17	
NV39-P001-006: Stead Total	-	NV39-P001-006: Stead Total	627,771	NV39-P001-006: Stead Total	-	NV39-P001-006: Stead Total	-	NV39-P001-006: Stead Total	-
NV39-P001-007:HAWK VIEW APTS.		NV39-P001-007:HAWK VIEW APTS.		NV39-P001-007:HAWK VIEW APTS.		NV39-P001-007:HAWK VIEW APTS.		NV39-P001-007:HAWK VIEW APTS.	
Replacement Reserves	219,459								
Replacement Reserves	866,401								
Relocation	000,401								
I		I		I				I	

RENO HOUSING AUTHORITY PROPOSED 5 YEAR PLAN 2023-2027

YEAR 1, FY 2023		YEAR 2, FY 2024		YEAR 3, FY 2025		YEAR 4, FY 2026		YEAR 5, FY 2027	
2023-2027 NOT IN EPIC		2023-2027 NOT IN EPIC	T	2023-2027 NOT IN E	PIC	2023-2027 NOT IN EPIC		2023-2027 NOT IN EPIC	1
Dev. Number/Name	Estimated	Dev. Number/Name	Estimated	Dev. Number/Name	Estimated	Dev. Number/Name	Estimated	Dev. Number/Name	Estimated
Major Work Category	Costs	Major Work Category	Costs	Major Work Category	Costs	Major Work Category	Costs	Major Work Category	Costs
NV39-P001-007: Hawkview Total	1,085,860	NV39-P001-007: Hawkview Total	-	NV39-P001-007: Hawkview Total	-	NV39-P001-007: Hawkview Total	-	NV39-P001-007: Hawkview Total	-
NV39-P001-009: ESSEX MANOR		NV39-P001-009: ESSEX MANOR		NV39-P001-009: ESSEX MANOR		NV39-P001-009: ESSEX MANOR		NV39-P001-009: ESSEX MANOR	
				Lighting Upgrades Asphalt Repair and Sealing	45,000 58,343				
NV39-P001-009 Essex Total		NV39-P001-009 Essex Total		NV39-P001-009 Essex Total	·	NV39-P001-009 Essex Total		NV39-P001-009 Essex Total	
NV39-P001-010: MYRA BIRCH MANOR		NV39-P001-010: MYRA BIRCH MANOR		NV39-P001-010: MYRA BIRCH MANOR		NV39-P001-010: MYRA BIRCH MANOR		NV39-P001-010: MYRA BIRCH MANOR	
				Siding Repair	250,000	Lighting Asphalt Sealing Exterior Paint Playground Equipment	75,000 75,000 330,000 150,000	Roof Replacement	350,000
NV39-P001-010 Myra Birch Total	-	NV39-P001-010 Myra Birch Total	-	NV39-P001-010 Myra Birch Total	250,000	NV39-P001-010 Myra Birch Total	630,000	NV39-P001-010 Myra Birch Total	350,000
NV39-P001-018: McGRAW COURT		NV39-P001-018: McGRAW COURT		NV39-P001-018: McGRAW COURT		NV39-P001-018: McGRAW COURT		NV39-P001-018: McGRAW COURT	
		Relocation	156,578			Replacement Reserves	203,343		
NV39-P001-018: McGraw Total	-	NV39-P001-018: McGraw Total	156,578	NV39-P001-018: McGraw Total	-	NV39-P001-018: McGraw Total	203,343	NV39-P001-018: McGraw Total	-
TOTAL PHYSICAL IMPROVEMENTS	1,434,290	TOTAL PHYSICAL IMPROVEMENTS	976,666	TOTAL PHYSICAL IMPROVEMENTS	833,343	TOTAL PHYSICAL IMPROVEMENTS	833,343	TOTAL PHYSICAL IMPROVEMENTS	833,343
ADMINISTRATION #1410 UP TO 10%	210,613	ADMINISTRATION #1410 UP TO 10%	142,381	ADMINISTRATION #1410 UP TO 10%	121,906	ADMINISTRATION #1410 UP TO 10%	121,906	ADMINISTRATION #1410 UP TO 10%	121,906
MANAGEMENT IMP #1408 UP TO 10%	-	MANAGEMENT IMP #1408 UP TO 10%	-	MANAGEMENT IMP #1408 UP TO 10%	-	MANAGEMENT IMP #1408 UP TO 10%	-	MANAGEMENT IMP #1408 UP TO 10%	-
OPERATION #1406 UP TO 20%	421,226	OPERATION #1406 UP TO 20%	284,762	OPERATION #1406 UP TO 20%	243,812	OPERATION #1406 UP TO 20%	243,812	OPERATION #1406 UP TO 20%	243,812
NON DWELLING EQUIPMENT	40,000	NON DWELLING EQUIPMENT	20,000	NON DWELLING EQUIPMENT	20,000	NON DWELLING EQUIPMENT	20,000	NON DWELLING EQUIPMENT	20,000
TOTAL SOFT (ADMIN) COSTS	671,839	TOTAL SOFT (ADMIN) COSTS	447,143	TOTAL SOFT (ADMIN) COSTS	385,718	TOTAL SOFT (ADMIN) COSTS	385,718	TOTAL SOFT (ADMIN) COSTS	385,718

RENO HOUSING AUTHORITY PROPOSED 5 YEAR PLAN 2023-2027

YEAR 1, FY 2023 2023-2027 NOT IN EPIC		YEAR 2, FY 2024 2023-2027 NOT IN EPIC		YEAR 3, FY 2025 2023-2027 NOT IN EPIC		YEAR 4, FY 2026 2023-2027 NOT IN EPIC		YEAR 5, FY 2027 2023-2027 NOT IN EPIC	
Dev. Number/Name	Estimated								
Major Work Category	Costs								
Award Amount:	2,106,129	Award Amount:	1,423,809	Award Amount:	1,219,061	Award Amount:	1,219,061	Award Amount:	1,219,061
Budgeted:	2,106,129	Budgeted:	1,423,809	Budgeted:	1,219,061	Budgeted:	1,219,061	Budgeted:	1,219,061

HOUSING AUTHORITY OF THE CITY OF RENO RESOLUTION 23-03-01 RH

A RESOLUTION APPROVING REVISIONS TO APPROVING REVISIONS TO CFP2022, CFP2023, CFP2024 AND CFP2025 FIVE YEAR ROLLING CAPITAL FUND PROJECT PLANS, AND TO ADD CFP2026 TO THE FIVE YEAR ROLLING CAPITAL FUND PROJECT PLAN

WHEREAS, the Housing Authority of the City of Reno (RHA) has received Capital Fund Program funding for modernization of its Public Housing complexes and management improvements, and

WHEREAS, the Department of Housing and Urban Development requires submission of performance and evaluation reports when changes have been made to the budget;

NOW, THEREFORE, BE IT HEREBY RESOLVED by the Board of Commissioners of the Housing Authority of the City of Reno as follows:

- 1. That the Board of Commissioners hereby authorizes and directs the Executive Director to submit the budget for the Five Year Rolling Capital Fund Project Plan in substantially the form attached hereto as Exhibit 230301-A.
- 2. That RHA will comply with all policies, procedures and requirements prescribed by HUD for modernization, including implementation of the modernization in a timely, efficient and economical manner;
- 3. That RHA has established controls to ensure that any activity funded by the CFP is not also funded by any other HUD program, thereby preventing duplicate funding of any activity.
- 4. That RHA will not provide to any development more assistance under the CFP than is necessary to provide affordable housing, after taking into account other government assistance provided.
- 5. That the proposed physical work will meet the modernization and energy conservation standards under 24 CFR 968 or 24 CFR 905;
- 6. That the proposed activities, obligations and expenditures in the Annual Statement are consistent with the proposed or approved RHA Comprehensive Plan.
- 7. That RHA will comply with applicable civil rights requirements under 24 CFR 968 or 24 CFR 905 and, where applicable, will carry out the Comprehensive Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, and Section 504 of the Rehabilitation Act of 1973.
- 8. That RHA has adopted a goal of awarding a specified percentage of the dollar value of the total of the modernization contracts, to be awarded during subsequent FFYs, to minority business enterprises and will take appropriate affirmative action to assist resident-controlled and women's business enterprises under 24 CFR 968; or RHA will, to the greatest extent feasible, give preference to the award of modernization contracts to Indian organizations and Indian-owned economic enterprises under 24 CFR 905.
- 9. That RHA has provided HUD with any documentation that the Department needs to carry out its review under the National Environmental Policy Act (NEPA) and other related authorities in accordance with 24 CFR 968.110(c), (d) and (m) or 24 CFR 905.120(a), (b), and (j), and will not obligate, in any manner, the expenditure of CFP funds, or otherwise undertake the activities identified in its Comprehensive Plan/Annual Statement, until RHA receives written notification from HUD indicating that the Department has complied with its responsibilities under NEPA and other related authorities.

- 10. That RHA will comply with the wage rate requirements under 24 CFR 968.110(e) and (f) or 24 CFR 905.120(c) and (d).
- 11. That RHA will comply with the relocation assistance and real property acquisition requirements under 24 CFR 968.110(g) or 24 CFR 905.120(e).
- 12. That RHA will comply with the requirements for physical accessibility under 24 CFR 968.110(h) or 24 CFR 905.120(g) and the Section 504 transition plan needs were met no later than July 1994.
- 13. That RHA will comply with the requirements for access to records and audits under 24 CFR 968.110(j) and 24 CFR 905.120(g).
- 14. That RHA will comply with the uniform administrative requirements under 24 CFR 968.110(j) or 24 CFR 905.120(h).
- 15. That RHA will comply with lead-based paint testing and abatement requirements under 24 CFR 968.110(k) and 24 CFR 905.120(g).
- 16. That RHA has complied with the requirements governing local/tribal government and resident participation in accordance with 24 CFR 968.320(b) and(c), 968.330(d) and 968.340 or 24 CFR 905.672(b) and (c), 905.678(d) and 905.684, and has given full consideration to the priorities and concerns of local/tribal government and residents, including any comments which were ultimately not adopted, in preparing the Comprehensive Plan/Annual Statement and any amendments hereto;
- 17. That RHA will comply with the special requirements of 24 CFR 968.310(d) or 24 CFR 905.666(d) with respect to a homeownership development;
- 18. That RHA will comply with the special requirements of 24 CFR 968-235 with respect to a Section 23 leased housing bond-financed development; and
- 19. The modernization work will promote housing that is modest in design and cost, but still blends in with the surrounding community.
- 20. In connection with the operation of any program or activity receiving federal financial assistance under the United States Housing Act of 1937, the RHA will comply with all requirements under the applicable regulations of the Department of Housing and Urban Development, 24 CFR 941, 24 CFR 8.50 and 24 CFR 8 which implements Section 504 of the Rehabilitation Act of 1973, or 24 CFR 24.630 which implements the Drug-Free Workplace Act of 1988 Certification, as appropriate, and all HUD regulations relating to the operation of public housing projects.

21. This resolution is to be encouve apoint	ie date of ite adoption.
ADOPTED THIS 28 th DAY OF March	, 2023.
	ATTEST
CHAIRMAN	SECRETARY

This Resolution is to be effective upon the date of its adoption.

21

HOUSING AUTHORITY OF THE CITY OF RENO RESOLUTION 23-03-02 RH

A RESOLUTION APPROVING REVISIONS TO CFP2023, CFP2024, CFP2025 AND CFP2026 FIVE YEAR ROLLING CAPITAL FUND PROJECT PLANS, AND TO ADD CFP2027 TO THE FIVE YEAR ROLLING CAPITAL FUND PROJECT PLAN

WHEREAS, the Housing Authority of the City of Reno (RHA) has received Capital Fund Program funding for modernization of its Public Housing complexes and management improvements, and

WHEREAS, the Department of Housing and Urban Development requires submission of performance and evaluation reports when changes have been made to the budget;

NOW, THEREFORE, BE IT HEREBY RESOLVED by the Board of Commissioners of the Housing Authority of the City of Reno as follows:

- 1. That the Board of Commissioners hereby authorizes and directs the Executive Director to submit the budget for the Five Year Rolling Capital Fund Project Plan in substantially the form attached hereto as Exhibit 230302-A.
- 2. That RHA will comply with all policies, procedures and requirements prescribed by HUD for modernization, including implementation of the modernization in a timely, efficient and economical manner;
- 3. That RHA has established controls to ensure that any activity funded by the CFP is not also funded by any other HUD program, thereby preventing duplicate funding of any activity.
- 4. That RHA will not provide to any development more assistance under the CFP than is necessary to provide affordable housing, after taking into account other government assistance provided.
- 5. That the proposed physical work will meet the modernization and energy conservation standards under 24 CFR 968 or 24 CFR 905;
- 6. That the proposed activities, obligations and expenditures in the Annual Statement are consistent with the proposed or approved RHA Comprehensive Plan.
- 7. That RHA will comply with applicable civil rights requirements under 24 CFR 968 or 24 CFR 905 and, where applicable, will carry out the Comprehensive Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, and Section 504 of the Rehabilitation Act of 1973.
- 8. That RHA has adopted a goal of awarding a specified percentage of the dollar value of the total of the modernization contracts, to be awarded during subsequent FFYs, to minority business enterprises and will take appropriate affirmative action to assist resident-controlled and women's business enterprises under 24 CFR 968; or RHA will, to the greatest extent feasible, give preference to the award of modernization contracts to Indian organizations and Indian-owned economic enterprises under 24 CFR 905.
- 9. That RHA has provided HUD with any documentation that the Department needs to carry out its review under the National Environmental Policy Act (NEPA) and other related authorities in accordance with 24 CFR 968.110(c), (d) and (m) or 24 CFR 905.120(a), (b), and (j), and will not obligate, in any manner, the expenditure of CFP funds, or otherwise undertake the activities identified in its Comprehensive Plan/Annual Statement, until RHA receives written notification from HUD indicating that the Department has complied with its responsibilities under NEPA and other related authorities.

- 10. That RHA will comply with the wage rate requirements under 24 CFR 968.110(e) and (f) or 24 CFR 905.120(c) and (d).
- 11. That RHA will comply with the relocation assistance and real property acquisition requirements under 24 CFR 968.110(g) or 24 CFR 905.120(e).
- 12. That RHA will comply with the requirements for physical accessibility under 24 CFR 968.110(h) or 24 CFR 905.120(g) and the Section 504 transition plan needs were met no later than July 1994.
- 13. That RHA will comply with the requirements for access to records and audits under 24 CFR 968.110(j) and 24 CFR 905.120(g).
- 14. That RHA will comply with the uniform administrative requirements under 24 CFR 968.110(j) or 24 CFR 905.120(h).
- 15. That RHA will comply with lead-based paint testing and abatement requirements under 24 CFR 968.110(k) and 24 CFR 905.120(g).
- 16. That RHA has complied with the requirements governing local/tribal government and resident participation in accordance with 24 CFR 968.320(b) and(c), 968.330(d) and 968.340 or 24 CFR 905.672(b) and (c), 905.678(d) and 905.684, and has given full consideration to the priorities and concerns of local/tribal government and residents, including any comments which were ultimately not adopted, in preparing the Comprehensive Plan/Annual Statement and any amendments hereto;
- 17. That RHA will comply with the special requirements of 24 CFR 968.310(d) or 24 CFR 905.666(d) with respect to a homeownership development;
- 18. That RHA will comply with the special requirements of 24 CFR 968-235 with respect to a Section 23 leased housing bond-financed development; and
- 19. The modernization work will promote housing that is modest in design and cost, but still blends in with the surrounding community.
- 20. In connection with the operation of any program or activity receiving federal financial assistance under the United States Housing Act of 1937, the RHA will comply with all requirements under the applicable regulations of the Department of Housing and Urban Development, 24 CFR 941, 24 CFR 8.50 and 24 CFR 8 which implements Section 504 of the Rehabilitation Act of 1973, or 24 CFR 24.630 which implements the Drug-Free Workplace Act of 1988 Certification, as appropriate, and all HUD regulations relating to the operation of public housing projects.

21. This Resolution is to be effective upo	on the date of its adoption.
ADOPTED THIS 28 th DAY OF Marc	<u>h</u> , 2023.
	ATTEST
CHAIRMAN	_ SECRETARY

RENO HOUSING AUTHORITY

AGENDA ITEM NUMBER: 4 March 28, 2023

SUBJECT: Commissioner Reports

FROM: Commissioners RECOMMENDATION: Discussion

RENO HOUSING AUTHORITY

AGENDA ITEM NUMBER: 5 March 28, 2023

SUBJECT: Executive Director/Secretary's Report. (Discussion)

FROM: Executive Director RECOMMENDATION: Discussion

A. Update on Agency Activities

- RHA partnered with HUD, the Nevada Rural Housing Authority, the Nevada Housing Coalition, and the Nevada State Apartment Association to hold a ½ day workshop targeted to landlords on the benefits of accepting Housing Choice Vouchers. The workshop was well received with over 40 attendees. There was a lot of positive feedback on RHA's new landlord liaison and the benefits of having a point of contact for landlords at the Authority.
- Deputy Director McKendree will be participating on a panel discussion on landlord incentives for the Housing Choice Voucher program at the MTW Collaborative Conference in Washington DC, April 11-12, 2023.
- RHA's Executive Director will participate in a panel discussion on senior housing options and needs as part of Older Americans Month. The panel is scheduled for May 11, 2023, at the Spanish Springs Library.
- RHA is partnering with RTC and the Washoe County Senior Center to "pack a bus" of seniors to attend the 2023 Senior Day at the NV Legislature. An RTC bus will pick up residents on Friday, April 7th, and bring them to Carson City to learn about senior issues, meet legislators, and hear guest speakers.
- RHA is participating in Affordable Housing Day at the Legislature on May 1, 2023.
 RHA will provide information on its housing and programs to legislators and other attendees.
- There is no update on the City of Reno's proposed Stormwater Utility Fee and RHA's submitted comments. Staff will continue to monitor this item.
- Staff has provided testimony in support of SB68 and signed onto a letter of support for AB310. Both bills provide additional funding for permanent supportive housing in Nevada. Staff continues to monitor other Bills which may impact RHA and its programs.

B. Update on Rental Assistance Voucher Programs / Asset Management

Rental Assistance Voucher Programs

Voucher Type	Total Voucher Baseline	Vouchers Leased as of 3/1/23	Percent Leased	Vouchers Issued Not Yet Leased
Housing Choice Voucher	2,477	2,258	91%	165
VASH	416	275	66%	50
EHV	137	82	60%	30
FYI	15	5	33%	0

Number HQS Ir Conducted by	-
February 2023	210

Housing Choice Vouchers (HCV)

<u>Description:</u> Vouchers used by clients to lease a unit in Washoe County of their choosing. Applicants are pulled from the RHA HCV Waitlist. These vouchers also include Project Based Vouchers. The RHA has chosen to Project Base 107 of our HCV's to assist special populations obtain housing. Of the total 107 PBV units, 95 are assigned to RHA owned properties.

<u>Lease-Up Expectations:</u> Although total voucher allocation is 2524, HUD has set the agency's leasing expectation at 2382 (AKA RHA's MTW Baseline), which is the maximum leasing expectation set by HUD when RHA signed its MTW Contract. Funds provided by HUD to support the HCV program are also used to support the agency's MTW activities and therefore full lease up of all 2524 vouchers is not expected or suggested by HUD.

Veteran's Affairs Supporting Housing Vouchers (VASH)

<u>Description:</u> Vouchers allocated by HUD with an ongoing partnership with the VA to serve homeless veterans. The VA provides case management services to participants. The VA makes direct referrals to RHA of eligible clients and the RHA provides a VASH voucher. Currently, RHA has project-based 9 of these vouchers.

Emergency Housing Vouchers (EHV)

<u>Description:</u> Vouchers allocated by HUD for the specific purpose of assisting homeless individuals or families or those at risk of homelessness in obtaining housing. RHA is partnering with four local agencies (Catholic Charities, Health Plan of Nevada, Washoe County Human Services-Our Place and Volunteers of America) that have experience providing services to this population. Referrals for the program must come from the regional Continuum of Care (CoC) coordinated entry system. Direct referrals are received by the RHA from the partnering agency and the RHA provides the EHV voucher.

Foster Youth to Independence Vouchers (FYI)

<u>Description:</u> Voucher allocated by HUD for the specific purpose of assisting foster youth aging out of the foster care system. RHA is partnering with Washoe County Human Services and Eddy House to provide referrals and case management to clients. Direct referrals are received by the RHA from the partnering agency and the RHA provides the FYI voucher.

Asset Management

- Maintenance staff continue to be busy with snow/ice removal. They have continued to remain focused on vacancy turns and urgent and emergency work orders in between the inclement weather storms. Management staff completed file audits during February. The audit results provided areas where training was needed to ensure minor errors do not continue to occur, but overall, the results were positive. Key Inventory will be the next task management staff will complete. Hawk View and Silverada will complete their key inventory process during the month of March.
- All Maintenance staff attended tankless water heater training courtesy of Rinnai company. The staff learned how to completely take the units apart and put them back together. They also learned how to troubleshoot and complete preventative

- maintenance. Staffs feedback was extremely positive and their level of comfort working on them has increased substantially.
- Public Housing ended the month of February with 14 vacancies for an overall occupancy rate of 97.82% across all sites. In February, ten residents vacated their unit, and nine units were leased.

The McGraw and Essex water heater replacement projects continue.

C. Update on Workforce Development, Elderly Services, and youth activities

Department Updates

- The Federal Communications Commission (FCC) announced funding allocations for the FY 2023 Your Home, Your Internet Pilot Program. RHA is being awarded its' full ask of \$57,459 for two part-time Connectivity Interns. Upon hire, these positions will focus on implementing innovative outreach strategies for the federal Affordable Connectivity Program (ACP) while providing application support to residents of the RHA to help bridge the broadband affordability gap.
- Staff attended a meeting with **Food Bank of Northern Nevada** and the **Children's Cabinet** to discuss multiple future partnership opportunities.

Elderly Services:

- RHA is partnering with RTC and the Washoe County Senior Center to "pack a bus" of seniors to attend the 2023 Senior Day at the NV Legislature. An RTC bus will pick up residents on Friday, April 7th, to bring to Carson City to learn about senior issues, meet legislators, and hear guest speakers.
- The senior services team is partnering with the Sanford Center for Aging to bring a new program, Healthy Steps for Older Adults, to Willie J. Wynn. This half-day program provides steps to make homes safer for seniors, reduce falls, and learn how to improve strength, balance, and overall fitness.

Workforce Development (WFD)

- WFD has partnered with JOIN, inc. to provide quarterly resume writing and communication workshops throughout 2023 to RHA residents looking to go back to work or move forward in their established careers.
- Upcoming workshops include Computer Skills with New Horizons, Consumer Banking with First Independent Bank and Greater Nevada Credit Union, and Job Interviewing.
- WFD currently has 81 active participants, with 16 applications pending.

Youth/Family Activities

- Eight RHA youth attended a Spring Break Bike Camp free of charge in partnership with **Reno Bike Project**.
- Three new opportunities open for RHA youth in April:

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- Music Classes with Note-Ables Music Therapy at Hawk View (for eight weeks)
- Music Classes with Note-Ables Music Therapy at Mineral Manor (for eight weeks)
- Youth Bachata Dance Class with Ballroom of Reno at Essex Manor (for the remainder of the year)

Resident Councils

- All active resident councils are collaborating to create an Easter event open to all RHA Public Housing residents. Residents are invited to dye and decorate eggs on March 31st at Silverada Manor, followed by an Easter egg hunt on April 1st at Hawk View Apartments. This is the first large-scale, collaborative event created by our councils.
- The Hawk View garden project is on track to be completed by the end of April. Over the next few weekends, residents and staff will volunteer their time to create the creative space in partnership with **Urban Roots**, **the Generator**, and local muralist, **Asa Kennedy**, in hopes of a grand opening in late April 2023 (weather pending).

D. Update on Public Affairs Activities

Opportunity Knocks Magazine

Submitted all exec leadership changes/updates to printer

Website Revamp

Continued meetings with and final content submission to Maslow Creative

Landlord Workshop

- Promoted in social and to traditional media HUD/RHA/NV Rural/NV Housing Coalition/NV Apartment Association landlord workshop
- Completed interview with KKOH on the event
- KRNV and Nevada Independent also covered the event the day of

Best Places to Work

- Final push ensured 78% of RHA employees answered the Northern Nevada Human Resources Association Best Places to Work survey
- Results expected the first week of April

Start Smart Scholarship Dinner

 Working on save the date, invitations and program design and layout for Start Smart Scholarship Dinner

^{*} The Authority's community partners are designated in bold within the Update on Elderly Services, Workforce Development, and youth activities headers.

New PAO Position

 New part-time social media coordinator position advertised. Current intern Mckenzie Papa was sole applicant and she accepted the position.

Social Media, Other Projects

- Replied to KRNV for Ask Joe query about VASH client. Attempted to coordinate response from VA. Their PAO never replied.
- Drafted release about PH waitlists opening week of March 27. Will push to media and on social.
- Submitted collateral material to No. Nev. Int'l. Center language bank. Awaiting finished product for use at PH repositioning meetings with residents.
- Firming up May date for home tour for elected officials, board of commissioners and RHA executive staff
- Finalizing news release for RHA +1 program
- Completed March Celebrity Homes Tour for staff. Will likely move to quarterly or semi-annually for future tours.
- Working on a new WFD video to advertise to residents

E. Update on Development Activities

- (CF2021) McGraw Ct. HVAC Replacement: Mt. Rose Heating and Airconditioning Inc. (\$304,000.00). Bids were opened December 16, 2022. The contract for this project was signed on January 26, 2023. Contractor is waiting on long lead items prior to signing a notice to proceed.
- (OPS) Dick Scott Manor Project: The design phase of the project was completed
 with plans submitted to the City of Reno for comment and plan review, the permit is
 expected to be issued in April 2023. RHA has received the final GMP from the
 general contractor (Plenium Builders) with 100% of bids received. The final
 construction contract and Notice to Proceed (NTP) is expected to be executed in
 March 2023.
- **(CF2020) John McGraw Court Water Heater Replacement:** Michael's Plumbing (\$141,909.00). A notice to proceed was issued December 5, 2022. Michael's Plumbing has completed installing the 33 water heaters under contract. The project is substantially complete and ready for final inspections.
- (CF 2020) Essex Manor Water Heater Replacement: Simerson Construction (\$630,081.00). A notice to proceed was issued January 9, 2023. Simerson has

completed the 100 water heaters under contract. The project is substantially complete and ready for final inspections.

- (CF2021) Stead Manor Concrete and Pavement Replacement: Spanish Springs Construction (\$598,000.00). The contract for this project was signed on December 16, 2022. Plans were submitted to the City of Reno for comments and plan review on March 13, 2023. The project will not start until asphalt plants re-open late spring of 2023.
- (CF 2021) Myra Birch Manor Video Surveillance System: 295 Cabling (\$73,840.00) Contract signing was December 8, 2022. Contractor is waiting on long lead items prior to signing a notice to proceed.
- (CF2021) Stead Manor Video Surveillance System: 295 Cabling (\$79,250.00)
 Contract signing was December 8, 2022. Contractor is waiting on long lead items prior to signing a notice to proceed.
- (OPS) 419 10th St. Sparks, NV 15 Unit Apartment Complex: A Letter of Intent (LOI) was delivered to the selling partners of the property October 31, 2022. The LOI was executed by the seller and returned to RHA November 8, 2022. Escrow was opened on the property November 11, 2022. RHA is in the process of providing a purchase and sales agreement for review by the owner. The City of Sparks has initiated an Environmental Assessment on the property.

F. Update on Information Technology activities

Electronic Document Management System

- 3/20/2023: All folder structures have been configured in the production environment.
- 3/20/2023: Staff continues to scan Rental Assistance files into the production environment.
 - 1367 out of approx. 2500 client files have been scanned.
 - All files will be scanned within 11 months at current scan rate.
- 3/21/2023: Staff begins planning the physical file prepping and scanning into Laserfiche for the Asset Management Department.

Yardi

- 3/20/2023: Staff continues Yardi online training.
- 3/20/2023: Yardi Voyager (PHA Software) configuration for financials, Rental Assistance, Asset Management, and Admissions continues.
- 3/27/2023: Staff begins the 2nd of 5 Yardi-led trainings.

G. Update on MTW Activities

FY 2024 Annual MTW Plan

• The FY 2024 Annual MTW Plan is included for Board approval. Staff attended several Resident Council meetings to provide an overview of the proposed activities and their effect on current Public Housing residents. A public hearing to answer questions and receive comments on the proposed MTW Annual Plan, which includes a Rental Assistance Demonstration Program and Section 18 Repositioning Amendment, was held on March 2, 2023. It was attended only by staff. The Plan is due to HUD on or before April 15.

MTW Collaborative Membership Call

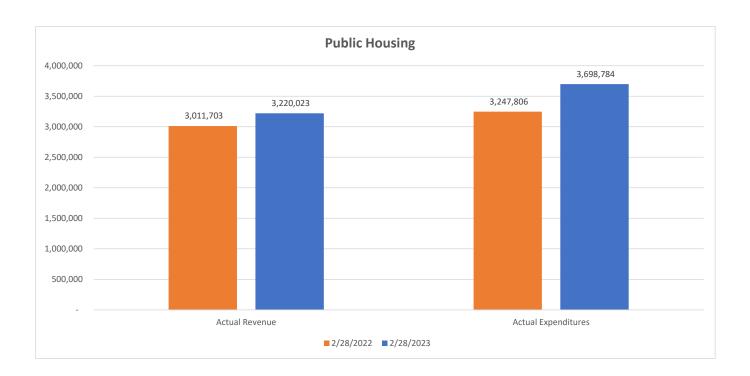
Staff attended the MTW Collaborative's quarterly general membership call. Topics
discussed included the 2023 MTW conference, voucher utilization & MTW reserves,
and the Biden Administration's FY24 budget proposal. A follow up call was held to
discuss details regarding HUD's proposed changes to the 50058 Forms for MTW
and MTW Expansion Agencies.

FY 2023 Annual MTW Report

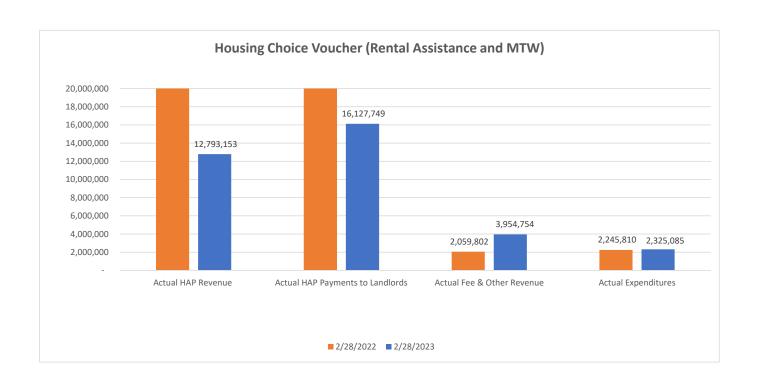
 Preparation for RHA's annual MTW Report to HUD has begun. Initial steps include several data pulls on current activities as well as disseminating surveys to Mobility Demonstration participants for analysis by the University of Washington.

H. Financials

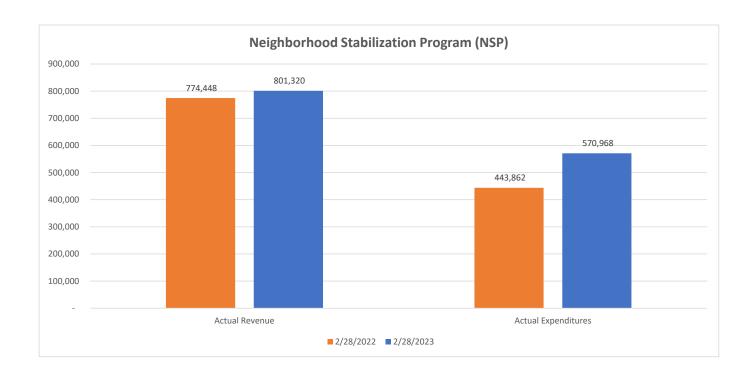
Public Housing	2/28/2023	2/28/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual Revenue	3,220,023	3,011,703	208,320	6.92%
Budgeted Revenue	3,112,559	3,065,047	47,512	1.55%
Actual Expenditures	3,698,784	3,247,806	450,978	13.89%
Budgeted Expenditures	3,790,466	3,207,541	582,925	18.17%
Actual Surplus (deficit)	(478,761)	(236,103)	(242,658)	102.78%



Housing Choice Voucher (Rental Assistance and MTW)	2/28/2023	2/28/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual HAP Revenue	12,793,153	25,727,988	(12,934,835)	-50.28%
Budgeted HAP Revenue	17,061,736	26,310,847	(9,249,111)	-35.15%
Actual HAP Payments to Landlords	16,127,749	25,315,064	(9,187,315)	-36.29%
Budgeted HAP Payments to Landlords	16,816,611	25,849,947	(9,033,336)	-34.95%
Actual Fee & Other Revenue	3,954,754	2,059,802	1,894,952	92.00%
Budgeted Fee & Other Revenue	1,781,729	2,268,105	(486,376)	-21.44%
Actual Expenditures	2,325,085	2,245,810	79,275	3.53%
Budgeted Expenditures	2,262,715	2,397,807	(135,092)	-5.63%
Actual Surplus (deficit)	(1,704,927)	226,916	(1,931,843)	-851.35%



Neighborhood Stabilization Program (NSP)	2/28/2023 2/28/2022 Variance Favorable (Unfavorable)		,	Variance Percentage
Actual Revenue	801,320	774,448	26,872	3.47%
Budgeted Revenue	796,137	747,818	48,319	6.46%
Actual Expenditures	570,968	443,862	127,106	28.64%
Budgeted Expenditures	458,500	461,596	(3,096)	-0.67%
Actual Restricted Surplus (deficit)	230,352	330,586	(100,234)	-30.32%



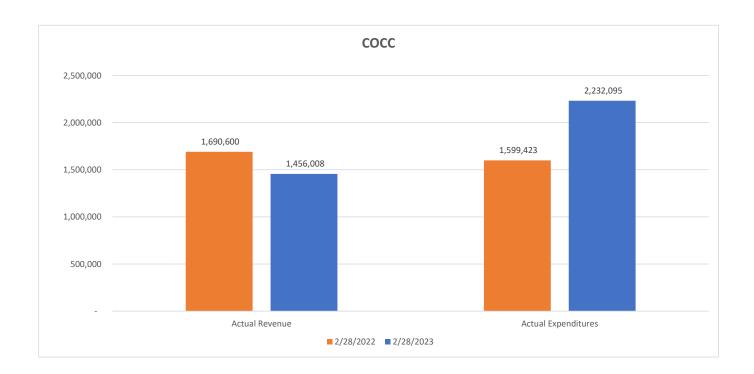
Business Activities	2/28/2023	2/28/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual Revenue	2,681,439	2,164,403	517,036	23.89%
Budgeted Revenue	2,731,652	2,149,088	582,564	27.11%
Actual Expenditures	1,153,166	1,180,691	(27,525)	-2.33%
Budgeted Expenditures	1,147,396	1,407,372	(259,976)	-18.47%
Actual Unrestricted Surplus (deficit)	1,528,273	983,712	544,561	55.36%



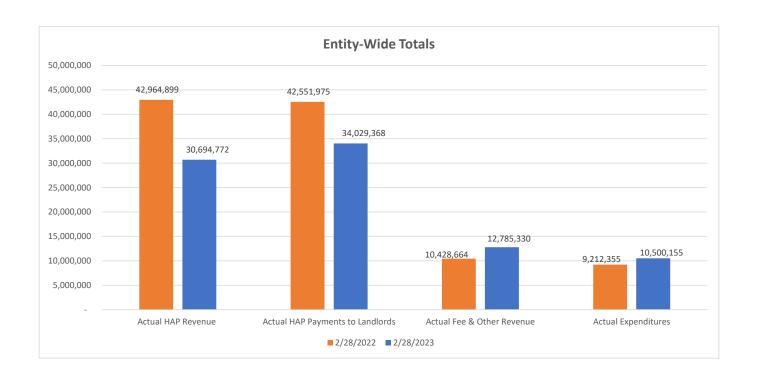
Washoe Affordable Housing (WAHC)	2/28/2023	2/28/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual HAP Revenue	17,901,619	17,236,911	664,708	3.86%
Budgeted HAP Revenue	17,158,193	17,756,904	(598,711)	-3.37%
Actual HAP Payments to Landlords	17,901,619	17,236,911	664,708	3.86%
Budgeted HAP Payments to Landlords	17,158,193	17,756,904	(598,711)	-3.37%
HAP Surplus (Deficit)	-	-	-	0.00%
Actual Admin and Fee Revenue	671,787	727,708	(55,921)	-7.68%
Budgeted Admin and Fee Revenue	688,677	591,584	97,093	16.41%
Actual Expenditures	520,057	494,763	25,294	5.11%
Budgeted Expenditures	471,705	449,408	22,297	4.96%
Unrestricted Profit (Loss)	151,730	232,945	(81,215)	-34.86%
Actual compared to budget	151,730	232,945	(81,215)	-34.86%



cocc	2/28/2023	2/28/2023 2/28/2022 Varial (Ur		Variance Percentage
Actual Revenue	1,456,008	1,690,600	(234,592)	-13.88%
Budgeted Revenue	1,588,260	1,295,173	293,087	22.63%
Actual Expenditures	2,232,095	1,599,423	632,672	39.56%
Budgeted Expenditures	2,585,136	1,250,209	1,334,927	106.78%
Actual Unrestricted Surplus (deficit)	(776,088)	91,177	(867,265)	-951.19%



Entity-Wide Totals	2/28/2023	2/28/2022	Variance Favorable (Unfavorable)	Variance Percentage
Actual HAP Revenue	30,694,772	42,964,899	(12,270,127)	-28.56%
Budgeted HAP Revenue	34,219,929	44,067,751	(9,847,822)	-22.35%
Actual HAP Payments to Landlords	34,029,368	42,551,975	(8,522,607)	-20.03%
Budgeted HAP Payments to Landlords	33,974,804	43,606,851	(9,632,047)	-22.09%
HAP Surplus (Deficit)	(3,334,596)	412,924	(3,747,520)	-907.56%
Actual Fee & Other Revenue	12,785,330	10,428,664	2,356,666	22.60%
Budgeted Fee & Other Revenue	10,699,013	10,116,815	582,198	5.75%
Actual Expenditures	10,500,155	9,212,355	1,287,800	13.98%
Budgeted Expenditures	10,715,918	9,173,933	1,541,985	16.81%
Unrestricted Profit (Loss)	2,285,175	1,216,309	1,068,866	87.88%
Actual Surplus (deficit)	(1,049,421)	1,629,233	(2,678,654)	-164.41%



RENO HOUSING AUTHORITY

AGENDA ITEM NUMBER: 6 March 28, 2023

SUBJECT: Discussion and possible action to renew the contract between the RHA and JF

Downey Realty Consulting & Advisory Services LLC for Eviction Prevention Services for an amount not to exceed \$217,700. (For Possible Action)

FROM: Executive Director RECOMMENDATION: For Possible Action

Background:

The RHA has contracted with the Emergency Eviction Prevention Program of Northern Nevada (EEPPNN) since February 1, 2021. Since that time EEPPNN has been assisting low-income community members by preventing pending evictions and assisting those who have already been evicted obtain and sustain stable housing. To help clients maintain stable housing going forward, EEPPNN also provides resource and referral services to community agencies that provide services such as childcare, employment, and financial literacy. EEPPNN has formed a model of service execution that not only prevents an imminent eviction but identifies referrals to assist with the barriers that caused the eviction. RHA has been contracting with EEPPNN since 2021. In that time, staff have made countless referrals to EEPPNN to assist RHA clients, community members not currently assisted by RHA but who seek help by coming to our offices and those who have applied for assistance but are not yet being assisted.

Prior to EEPPNN, RHA did not have an emergency assistance resource to call when an applicant from the waitlist asks how long they will have to wait for a voucher because they are being evicted for non-payment of rent and need the assistance now, or when a community member comes to the lobby asking for RHA's assistance because they are living out of their vehicle and have a prior eviction on their record preventing them from finding an apartment. Contracting with EEPPNN, staff have a place to call when these all too familiar situations arise. And when staff calls EEPPNN, they are available, often immediately. This access to emergency assistance has made RHA a more community friendly agency where assistance is sought, and provided, regardless of whether someone is receiving a subsidy from RHA or living in one of our units.

EEPPNN Executive Director, Farrah Downey, is easily accessible to RHA staff and has routinely helped with walk-in clients. Ms. Downey and her staff have also worked with RHA to formulate additional options for existing clients. Given EEPPNNs ability to act quickly and nimbly, their staff can take on challenging, time sensitive cases that RHA would be limited to address and can provide successful outcomes. Ms. Downey is also the

unbiased outsider that can help when our clients are distrustful of RHA or "government" employees.

EEPPN is currently working under a contract which will expire April 30, 2023. Ms. Downey has requested to renew EEPPNN's contract, which is allowable under the terms of the current contract based on RHA need and Board approval. It should be noted that this renewal request includes an increase in the overall contract amount to include funding for administrative expenses and one additional staff position.

Ms. Downey has taken steps, during the term of her current contract, to obtain other funding to support EEPPNN, but has not been awarded program funding to date. Please see her letter for specific examples. She understands that RHA's full support of all program expenses cannot continue in perpetuity, but she asks that funding be provided for the coming year to give her time to secure additional funding to support the program. Staff have been assisting Ms. Downey with her data collection mechanisms and method of reporting data to ensure it is impactful and demonstrates the value EEPPNN services provide. She will be continuing discussions with stakeholders regarding funding and prioritizing those stakeholders utilizing her services the most.

Staff Recommendation: To approve the renewal of the contract between RHA and EEPPNN (J. F. Downey Realty Consulting & Advisory Services LLC.) from May 1, 2023, through April 30, 2024, in the amount of \$217,700 with the understanding that further funding may not be provided or may be provided based solely on program usage.

March 23, 2023

Reno Housing Authority, Executive Director Dr. Hilary Lopez And Reno Housing Authority Board of Commissioners 1525 E. 9th Street Reno. NV 89512

Re: Renewal of EEPPNN Contract

Dear RHA Executive Director and Board of Commissioners,

As EEPPNN nears the expiration of its current contract with RHA, I would like to request a renewal of the contract from May 1, 2023, through April 30, 2024. My current contract allows for a renewal for one additional year should the Authority deem the services necessary and desired. In addition, I am requesting for an increase in funding to support administrative overhead, which has not been requested in the past as well as an additional Junior Advisor position to allow all staff more time to conduct administrative duties as well as provide additional support to the current Junior Advisor.

First, let me start by thanking the Board of Commissioners for seeing the value in the services that EEPPNN provides and for funding the program since its inception in February of 2021. As the program has experienced a rapid increase in applications for assistance, EEPPNN has also seen a proportionate increase in positive outcomes related to services being provided. In addition, EEPPNN has surpassed the goals set forth by RHA in the current contract and does not foresee any issues in exceeding those goals in the coming contract year.

In previous years, EEPPNN's contract amount has covered staff salaries for me, a Junior Advisor and Intake Specialist. The request for funding has not included administrative expenses which have also grown proportionate to the program. Given program growth, EEPPNN respectfully requests an increase in funding to support both the administrative costs of the program as well as the addition of one staff member to meet the need for services evidenced by the number of clients assisted throughout the past several years.

Over the past year, EEPPNN has made two grant applications to secure funding to support the program to alleviate RHA of the sole burden of funding the program. An application was submitted in January 2023 to the Washoe County HOME Consortium to fund EEPPNN services and program administrative expenses. In February 2023, EEPPNN applied to Washoe County for Emergency Rental Assistance II funds to provide rental assistance payments to clients of EEPPNN. Neither application resulted in an award of funding. Feedback gained from the WCHC process identified that the ability to trace referrals to specific agencies was necessary to demonstrate a need for funding that fills a niche that no other provider can demonstrate.

Additionally, during the past year I have met with Reno Justice Court, City of Reno, Washoe County, Health Plan of Nevada and landlords and will continue these meetings to request a regular contribution to EEPPNN to support the services we provide to these agencies clients as evidenced by the referrals they make to EEPPNN.

Based on feedback provided by the WCHC during the HOME-ARP grant review process I now see that many of EEPPNN's client referrals come from community agencies who advise their

clients to contact EEPPNN for assistance. There is no formal referral process in place for these agencies to refer directly to EEPPNN. The current method of referring clients by "word of mouth" makes it difficult for EEPPNN to document that community agencies are utilizing EEPNN's services to assist their clients and therefore justify a need for these agencies/municipalities to support funding of our services. Based on referral data and WCHC feedback, EEPPNN will be scaling its program to accept primarily direct referrals from community agencies and partners.

EEPPNN fills a niche in the community because of the services both I and my staff can provide. It's our ability to be flexible and meet clients where they are, both figuratively and literally that makes EEPPNN unique. We advocate for our clients with our community partners and, if necessary, walk them through the process of obtaining assistance to mitigate their circumstances. We act as their voice while navigating an often-confusing bureaucratic system.

I understand that requesting RHA to fund EEPPNN for our full program costs for another year means RHA is covering the expenses incurred by other community agencies. To ensure future funding is spread proportionally among the agencies that utilize EEPPNN's services, I plan on taking the next year to formalize agreements with these community agencies to support EEPPNN's ongoing expenses. Since the services provided by EEPPNN help more than just RHA referred clients, multiple agreements partially funding the program will result in full funding of the program.

If funded for the coming year by RHA, I will contract with an IT professional who can create a database to allow for streamlined tracking of referrals, clients and outcomes and that will generate reports to demonstrate the need for EEPPNN's services. Since my time will be split between working with our most difficult clients and working to further EEPPNN's funding resources, an additional Junior Advisor is needed which may help to explain the request to expand staffing.

Going forward, EEPPNN will prioritize direct referrals from the following agencies and community partners. EEPPNN will create a direct referral mechanism to ensure agency based tracking of referrals received.

Reno Housing Authority
Landlords/Property Managers
Washoe County School District
Reno & Sparks Justice Courts
City of Sparks
City of Reno
Washoe County including the Washoe County Sherriff's Office

Applications from other agencies and directly from community members will continue to be accepted, but priority will be given to the above agencies. All community agencies will be able to refer clients with the understanding that future funding of the program will depend on their financial support in the future.

I would like to thank RHA's Board of Commissioners for your support of EEPPNN throughout the years. With every new year, the program becomes more streamlined and effective at serving those most in need within our community. My goal is to be able to provide services

throughout the community with funding for the program being received from each agency proportionately going forward.

Thank you for your support, time and consideration.

Sincerely,

Farrar Downey
EEPPNN Executive Director

Emergency Eviction Prevention Program of Northen Nevada

Data reflects February 1, 2021 through March 10, 2023

Please note that multiple services may be provided to one household to ensure a successful outcome and sustainability

Source of Referral	Successful Outcomes	Eviction Prevention	Crisis Relocation	Sustainability Advising aka Housing Navigation	Cost Per Referral Source
RHA	130	55	5	103	\$55,805.10
Landlords	119	78	8	52	\$51,083.13
Internet*	56	26	3	37	\$24,039.12
Personal	45	25	2	27	\$19,317.15
City of Reno	35	8	9	25	\$15,024.45
Sparks Justice Court	14	6	3	11	\$6,009.78
Reno Justice Court	21	12	1	15	\$9,014.67
Washoe County School District	19	10	2	14	\$8,156.13
Washoe County Sheriff Dept	5	5	0	2	\$2,146.35
Washoe County	24	9	3	18	\$10,302.48
VOA	8	6	1	4	\$3,434.16
211	12	3	0	10	\$5,151.24
JFD Outreach	10	6	1	5	\$4,292.70
Access To healthcare	7	2	1	3	\$3,004.89
Undeclared	7	2	2	3	\$3,004.89
Grant Denton/Karma Box	6	2	2	2	\$2,575.62
Natalie Handler/Local Activist	5	2	1	4	\$2,146.35
State of Nevada	5	1	0	4	\$2,146.35
Catholic Charities	4	1	1	3	\$1,717.08
HealthPlan of Nevada	4	2	1	2	\$1,717.08
NV Legal Services	3	1	0	3	\$1,287.81
Domestic Violence Resource Ctr.	2	1	0	1	\$858.54
Joey Gilbert Law	2	0	0	2	\$858.54
Children's Cabinet	2	0	0	2	\$858.54
EBT Provider APP	2	0	0	2	\$858.54
NV Cntr Indy Living	2	0	0	2	\$858.54
Washoe Legal Services	2	1	0	2	\$858.54
WOM Shelter	2	1	0	2	\$858.54
Sierra Community House	2	0	1	1	\$858.54
Molina Healthcare	1	0	1	1	\$429.27
NNHopes Clinic	1	0	1	1	\$429.27
UNR Resource Center	1	1	0	0	\$429.27
KPS3	1	0	0	1	\$429.27
Employers	1	1	0	1	\$429.27
Safe House	1	1	0	1	\$429.27
Abbi Agency	1	1	1	1	\$429.27
TOTAL	562	269	50	367	\$241,250

*Program Funding provided by RHA to

\$429.27 Per Client

^{*} Data reflects entire Program life (minus 51 days) Feb 1, 2021-March 10,2023

^{*} Most Internet was sent by RHA but not tracked most of 2021

Emergency Eviction Prevention Program of Northern Nevada (EEPPNN)

Historic Program Data

February 1, 2021 - March 10, 2023			
Staff			
Sr. Advisor	\$	166,250	
Junior Advisor	\$	43,000	
Intake Specialist	\$	32,000	

TOTAL Contract \$ 241,250

Program Data from Inc through Current	•	*These figures represent data collected 2/1/21 through 3/10/23.
Total Clients Successfully Served		Client often require more than one service to be considered succesfully served.
Total Eviction Prevention Services	269	To be considered a successful outcome, the eviction must have been prevented.
Total Crisis Relocation Services	50	
Total Housing Navigation Services	367	
TOTAL SERVICES PROVIDED	686	
	\$352/ Service \$429/Client	

Current Request			
May 2023 - April 2024 (New Contract Term)			
Staff			
Sr. Advisor	\$	81,000	
Junior Advisor	\$	43,000	
Junior Advisor	\$	43,000	
Intake Specialist	\$	32,000	
Admin Expenses			
Office Supplies	\$	6,000	
Transportation	\$	3,000	
Office Space Rent/Utilities	\$	9,700	
Database Development Fee (one time)	\$	2,500	
TOTAL Request	\$	220,200	

Projected Program Data for New Contract			
Term			
Total Clients Successfully Served	345		
Tatal Frieting Research (Coal)	466		
Total Evictions Prevented (Goal)	166		
Total Crisis Relocations (Goal)	25		
Total Housing Navigation Services (Goal)	345		
	536		
\$410/Servic	e		
\$638/Client			

Based on data presented to the Washoe County Commission by Washoe County staff in October of 2022, the average cost of housing an individual at the local shelter costs the community \$74 per night. A recently evicted individual could spend anywhere from a week to several months in the shelter before being able to secure stable housing. An eviction is one of the most damaging events to renters as it typically prevents them from being able to rent another unit. EEPPNN is able to prevent an eviction for less than the cost of housing the same individual in the shelter for less than a week. This cost benefit to the community is only multiplied if the individual ends up incarcerated or in the hospital. EEPPNN is one of the solutions this community has in its toolkit to prevent homelessness and decrease the risk of homelessness by preventing the eviction from happening.

If the unfortunate outcome for a member of our community is eviction, EEPPNN is able to assist with crisis relocation. By reaching out to our housing resources, which include willing landlords, deposit assistance programs and the city's justice courts, EEPPNN can help individuals and families find stable housing after an eviction.

Finally, EEPPNN works with its clients to help them identify the causes of the eviction and navigates these clients to resources that will help them from ending up in the same situation again. Housing Navigation services can range from referring to childcare providers, employers and financial literacy education. Preventing evictions from happening again and helping our clients sustain their housing is a key part of our mission.

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Washoe County Data as of Oct	obe	er 2022
Avg. Cost of Shelter Bed/night	\$	74
Avg. Cost of Hospital Stay/night	\$	2,397
Avg. Cost of Detention/night	\$	161
Avg. Cost of REMSA Transport	\$	550
Avg. Cost to Move to a New Unit	\$	1,400

THIS AGREEMENT effective the 1st day of May, 2022, by and between the Housing Authority of the City of Reno ("Authority") and JF Downey Realty Consulting & Advisory Services LLC. (" Independent Contractor") of Reno, Nevada,

WHEREAS, it is deemed that the services of an independent contractor to provide Crisis Relocation, Housing Navigation and Eviction Prevention services herein specified necessary and desirable and in the best interests of the Authority; and that the Independent Contractor represents that he/she is duly qualified and able to render the services as herein described;

NOW, THEREFORE, in consideration of aforesaid premises, the Authority and the Independent Contractor do mutually agree as follows:

1. <u>Scope of Work:</u> The Independent Contractor will perform the following services. The Authority shall review Independent Contractor's work against goals and objectives, at least quarterly.

The Independent Contractor will provide the following services with the corresponding goals:

- A. Eviction Prevention Assist at least 70 households
- B. Crisis Relocation Assist at least 25 households
- C. Housing Navigation Assist at least 100 households

The Independent Contractor will make every effort to ensure that referrals received from RHA staff receive preference, but final determination of priority is to be determined by the Independent Contractor. Services will only be provided to individuals or families whose income is less than 80% of the area median income. Eligibility determinations will be made by the Contractor whose decision will be final and non-appealable.

- 2. <u>Duration of Work:</u> May 1, 2022, through April 30, 2023. Upon expiration of this contract, should continuation of services be desired and deemed necessary by the Authority. The Authority may choose to renew this contract for one additional year, with Board approval. Should RHA Board choose not to renew Independent Contractor's contract, at Independent Contractor's option, Independent Contractor may respond to a Request for Proposal released by the Authority.
- 3. <u>Terms of Compensation</u>: Independent Contractor shall be paid \$13,017.17 on the first of each month, inclusive of any expenses incurred by the Independent Contractor in the delivery of services or aid rendered to clients in furtherance of the scope of work. Independent Contractor is responsible for any other payment for services to any individual assisting in the performance of the Scope of Work. Sub-contract payments made by the Independent Contract to meet the requirements of the Scope of Work, will be the sole responsibility of the Independent Contractor. In no event will the Authority remit to the Independent Contractor fee for costs and services a monthly payment in excess of \$13,017.17.
- 4. <u>Hours of Services</u>: The services covered by this Agreement are of an urgent nature, given, for example, that the Scope of Work includes the removal of threats posed to becoming homeless. Accordingly, the Independent Contractor shall be available to receive clients on a schedule she/he sees fit to meet the requirements in the Scope of Work. Independent Contractor agrees to respond to referrals within 72 business hours of receipt.
- 5. Reporting and Audit: By the eighth day of each month, Independent Contractor shall submit a written report to Authority Executive Director, or designee. The content of the monthly report will be determined in cooperation with RHA staff and Independent Contractor and may change during the course of this agreement should either party determine it is necessary. The Authority will conduct quarterly financial and program audits to ensure this contract is

fulfilled in a satisfactory, financially responsible, and proper manner. Independent Contractor shall maintain the confidentiality of all information obtained during the performance of this Agreement and may release such information only as allowed or required by law or the Agreement. There will be no posting of or about RHA to any social media including, but not limited to Facebook, Instagram, Twitter, etc., this also includes websites and blogs.

- 6. Records: Independent Contractor shall maintain full and accurate records with respect to all matters under this Agreement for a period of three years. The Authority shall have free access at all reasonable times to such records, and the right to examine and regularly audit the same, to make transcripts therefrom, and to inspect all program data, documents proceedings and activities.
- 7. Independent Contractor/Authority Relationship: The relationship between the Authority and Independent Contractor shall not be of employer/employee but of Independent Contractor. The Independent Contractor shall be evaluated and compensated according to the Scope of Work and limitation upon the services which may be provided, the methodology for the delivery of services is strictly the province of the Independent Contractor. How services are to be delivered is exclusively the Independent Contractor's decision. The Authority will not withhold taxes from the \$13,017.17 monthly payment made to the Independent Contractor. The Independent Contractor shall provide an employer EIN number and will receive an IRS form 1099. The Independent Contractor will not participate in any of the Authority's employee benefits, there is no PTO under this agreement and no health insurance. Also, the Independent Contractor shall be expected to maintain workers' compensation coverage and automobile insurance acceptable to the Authority with the Authority listed as a named insured. The policy shall also provide that the Authority should be notified in advance of any cancellation of insurance.

The Authority will provide technical assistance to the Independent Contractor at his/her request to assist in data dissemination and program presentations to secure future funding. The Authority does not guarantee future funding by either the Authority or other funding sources.

8. General Terms and Conditions:

- A. The Authority or the Independent Contractor may from time to time suggest changes in the scope of the services of the Independent Contractor to be performed hereunder; however, this Agreement is intended to constitute the entire Agreement between the parties and may only be modified by a written instrument signed by the parties.
- B. This agreement shall be construed and interpreted according to the laws of the State of Nevada.
- C. Independent Contractor may sub-contract its duties under this Agreement to third parties, subject to the terms and conditions of this Agreement. Any sub-contract will be at the sole expense and cost of the Independent Contractor and the Independent Contractor shall not be relieved of its duties under the terms and conditions of this Agreement and shall remain responsible for the performance of the terms and conditions of this Agreement. Independent Contractor shall accordingly ensure compliance by such Sub-Contractors with the terms hereof and Independent Contractor shall be liable for and remain responsible for all costs associated with such Sub-Contractors including but not limited to wages, salaries, and benefits.
- D. Independent Contractor agrees to indemnify and save and hold the Authority, their agents, and employees harmless from all claims or causes of action of liability arising from the performance of this Agreement by Independent Contractor. Independent Contractor agrees to defend and indemnify the Authority from and against any and all claims made by any person during or as a result of the performance of the duties described in this Agreement by Independent Contractor, Independent Contractor's employees, sub-contractors, agents or volunteers for stolen, damaged, lost or misplaced property of any kind.

- E. <u>Interest of Members of the Housing Authority</u>. No member of the governing body of the Housing Authority, and no other officer, employee, or agent of the Housing Authority who exercises any functions or responsibilities in connection with the carrying out of this Contract, shall have any personal interest direct or indirect, in this Contract.
- F. <u>Interest of Other Local Public Officials</u>. No member of the governing body of the locality in which the Housing Authority projects are situated and no other public official of such locality, who exercises any functions or responsibilities in the review or approval of the carrying out of this Contract, shall have any personal interest, direct or indirect, in this Contract.
- G. <u>Interest of Certain Federal Officials</u>. No member or delegate to the Congress of the United States, and no resident Commissioners, shall be admitted to any share or part of this Contract or to any benefit to arise therefrom.
- H. Interest of Independent Contractor. Independent Contractor (including partners, associates, and professional employees) covenants that she/he does not now have any interest and shall not acquire any interest, direct or indirect, in any Project of the Housing Authority or any other interest which would conflict in any manner or degree with the performance of his services hereunder. Independent Contractor further covenants that in the performance of his duties hereunder no person having any such interest shall be employed.
- I. <u>Equal Employment Opportunity</u>. During the performance of this Contract, Independent Contractor agrees as follows:
 - A. Independent Contractor will not discriminate against any employee or applicant for employment because of race, color, religion, national origin, disability, or age. Independent Contractor will take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex, national origin, disability, or age. Such action shall include but not be limited to the following: Employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. Contractor agrees to post in conspicuous places, available to employees and applicants for employment, notices to be provided by the Housing Authority setting forth the provisions of this nondiscrimination clause.
 - B. Independent Contractor will, in all solicitations or advertisements for employees placed by or on behalf of the Independent Contractor, state that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, national origin, disability or age.
- J. Anti-Lobbying Clause. During the performance of this Contract, the Independent Contractor agrees as follows:
 - A. No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative, agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.
 - B. If any funds other than federal appropriated funds have been paid or will be paid any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of congress in connection with this federal

contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

9. <u>Insurance</u>:

General Coverage: Insurance policies are to be secured by the Independent Contractor and always remain in full force and effect to provide protection against liability for damages which may be imposed due to liability of the Independent Contractor including, but not limited to, general liability and automobile liability insurance. Said amounts shall not be construed to limit the Independent Contractor's liability. The insurance requirements provided herein may be modified or waived in writing by the Authority provided the Authority determines that such waiver or modification does not unreasonably increase the risk of exposure to the Authority, including the fact that the Independent Contractor may be self-insured up to a certain acceptable amount.

Vehicle Insurance: The Independent Contractor shall obtain and maintain in full force and effect throughout the entire term of this Agreement a vehicle liability policy listing Authority as an additional insured party with a minimum limit of Three Hundred Thousand Dollars (\$300,000) per occurrence for bodily injury and One Hundred Thousand Dollars (\$100,000) per occurrence for property damage. The Authority recommended vehicle liability policy is One Million Dollars (\$1,000,000) per occurrence for bodily injury and Two Hundred Thousand Dollars (\$200,000) per occurrence for property damage but is not mandatory. Said insurance shall protect the Independent Contractor and the Authority from any claim for damages for bodily injury, including accidental death, as well as from any claim for property damage which may arise from operation of owned and non-owned vehicles. Copies of the policies or endorsements evidencing the above-required insurance coverage shall be filed with the Authority.

<u>Workers Compensation Insurance</u>: Independent Contractor shall obtain and maintain Workers Compensation insurance in accordance with NRS 616.A specifically NRS 616A.210.

- A. <u>Proof of Insurance:</u> At the Authority's request, the Independent Contractor shall provide the Authority with:
 - i. Certificates or other acceptable evidence of insurance evidencing its coverage in compliance with this section.
 - ii. Notice of any material change to that coverage.
- 10. <u>Exclusion from Services</u>: Independent Contractor shall not directly provide services requiring a professional degree such as, but not limited to, the delivery of legal services, medical care, counseling, psychology, psychiatry, ministry and social services.
- 11. <u>Fees for Services</u>: Independent Contractor shall not charge the client any fee for services or seek reimbursement from the client for costs incurred in the delivery of services.
- 12. <u>Termination of Contract</u>: If, through any cause, the Independent Contractor shall fail to fulfill in timely and proper manner his obligations under this contract, the Authority will give a written notice of said failure allowing Independent Contractor a fourteen-day corrective period. If corrective action is not taken the Authority shall thereupon have the right to terminate this contract forthwith by written notice to the independent Contractor. This Agreement may be terminated without cause by either party by giving written notice to the other party at least seven days prior to the effective date of such termination. Upon the termination of this contract for any cause, all documentation and records of all types and nature (if any) involved in the Independent Contractor's performance of

the services rendered under this contract shall, always, be the property of the Authority and shall be delivered to the Authority within thirty days of the termination of said contract.

Housing Authority of the City of Reno

1525 E 9th Street

Reno NV 89512-3012

Phone: 775-329-3630 EIN: 88-6000260 JF Downey Realty Consulting & Advisory Services, LLC.

2780 Fargo Way

Sparks, NV 89434

Phone: 775-386-0039

EIN: 86-1300965

IN WITNESS WHEREOF, the parties have signed this Agreement to be effective the date entered on the first page hereon.

Housing Authority of the City of Reno

JF Downey Realty Consulting & Advisory Services, LLC.

Heidi McKendree

Interim Executive Director/Contracting Officer

Farrah E. Downey

CEO

THIS AGREEMENT effective the <u>1st day of May, 2023</u>, by and between the Housing Authority of the City of Reno ("Authority") and <u>JF Downey Realty Consulting & Advisory Services LLC.</u> (" Independent Contractor") <u>and its subsidiary Emergency Eviction Prevention Program of Norther Nevada</u> of Reno, Nevada,

WHEREAS, it is deemed that the services of an independent contractor to provide Crisis Relocation, Housing Navigation and Eviction Prevention services herein specified necessary and desirable and in the best interests of the Authority; and that the Independent Contractor represents that he/she is duly qualified and able to render the services as herein described;

NOW, THEREFORE, in consideration of aforesaid premises, the Authority and the Independent Contractor do mutually agree as follows:

1. <u>Scope of Work</u>: The Independent Contractor will perform the following services. The Authority shall review Independent Contractor's work against goals and objectives, at least quarterly.

The Independent Contractor will provide the following services with the corresponding goals:

A. Successfully assist at least 345 households with services listed below.

A.a. Eviction Prevention — Assist at least 70 households

B.b. Crisis Relocation - Assist at least 25 households

C.c. Stability Advising aka Housing Navigation - Assist at least 100 households

The Independent Contractor will make every effort to ensure that referrals received from RHA staff receive preference, but final determination of priority is to be determined by the Independent Contractor. Services will only be provided to individuals or families whose income is less than 80% of the area median income. Eligibility determinations will be made by the Contractor whose decision will be final and non-appealable.

- <u>Duration of Work</u>: May 1, 20223, through April 30, 20234. Upon expiration of this contract, should continuation of services be desired and deemed necessary by the Authority. The Authority may choose to renew this contract for one additional year, with Board approval. Should RHA Board choose not to renew Independent Contractor's contract, at Independent Contractor's option, IndependentRHA may choose to issue a Request for Proposal and Contractor may respond to a Request for Proposal released by the Authority.
- 3. <u>Terms of Compensation</u>: Independent Contractor shall be paid \$13,017.1718,350.00 on the first of each month, inclusive of any expenses incurred by the Independent Contractor in the delivery of services or aid rendered to clients in furtherance of the scope of work. Independent Contractor is responsible for any other payment for services to any individual assisting in the performance of the Scope of Work. Sub-contract payments made by the Independent Contract to meet the requirements of the Scope of Work, will be the sole responsibility of the Independent Contractor. In no event will the Authority remit to the Independent Contractor fee for costs and services a monthly payment in excess of \$13,017.1718,350.00.
- 4. <u>Hours of Services</u>: The services covered by this Agreement are of an urgent nature, given, for example, that the Scope of Work includes the removal of threats posed to becoming homeless. Accordingly, the Independent Contractor shall be available to receive clients on a schedule she/he sees fit to meet the requirements in the Scope of Work. Independent Contractor agrees to respond to referrals within 72 business hours of receipt.
- 5. <u>Reporting and Audit</u>: By the eighth day of each month, Independent Contractor shall submit a written report to Authority <u>Deputy</u> Executive Director, or designee. The content of the monthly report will be determined in

cooperation with RHA staff and Independent Contractor and may change during the course of this agreement should either party determine it is necessary. The Authority will conduct quarterly financial and program audits to ensure this contract is fulfilled in a satisfactory, financially responsible, and proper manner. Independent Contractor shall maintain the confidentiality of all information obtained during the performance of this Agreement and may release such information only as allowed or required by law or the Agreement. There will be no posting of or about RHA to any social media including, but not limited to Facebook, Instagram, Twitter, etc., this also includes websites and blogs.

- 6. <u>Records</u>: Independent Contractor shall maintain full and accurate records with respect to all matters under this Agreement for a period of three years. The Authority shall have free access at all reasonable times to such records, and the right to examine and regularly audit the same, to make transcripts therefrom, and to inspect all program data, documents proceedings and activities.
- 7. Independent Contractor/Authority Relationship: The relationship between the Authority and Independent Contractor shall not be of employer/employee but of Independent Contractor. The Independent Contractor shall be evaluated and compensated according to the Scope of Work and limitation upon the services which may be provided, the methodology for the delivery of services is strictly the province of the Independent Contractor. How services are to be delivered is exclusively the Independent Contractor's decision. The Authority will not withhold taxes from the \$13,017.1718,350.00 monthly payment made to the Independent Contractor. The Independent Contractor shall provide an employer EIN number and will receive an IRS form 1099. The Independent Contractor will not participate in any of the Authority's employee benefits, there is no PTO under this agreement and no health insurance. Also, the Independent Contractor shall be expected to maintain workers' compensation coverage and automobile insurance acceptable to the Authority with the Authority listed as a named insured. The policy shall also provide that the Authority should be notified in advance of any cancellation of insurance.

The Authority will provide technical assistance to the Independent Contractor at his/her request to assist in data dissemination and program presentations to secure future funding. The Authority does not guarantee future funding by either the Authority or other funding sources.

8. General Terms and Conditions:

- A. The Authority or the Independent Contractor may from time to time suggest changes in the scope of the services of the Independent Contractor to be performed hereunder; however, this Agreement is intended to constitute the entire Agreement between the parties and may only be modified by a written instrument signed by the parties.
- B. This agreement shall be construed and interpreted according to the laws of the State of Nevada.
- C. Independent Contractor may sub-contract its duties under this Agreement to third parties, subject to the terms and conditions of this Agreement. Any sub-contract will be at the sole expense and cost of the Independent Contractor and the Independent Contractor shall not be relieved of its duties under the terms and conditions of this Agreement and shall remain responsible for the performance of the terms and conditions of this Agreement. Independent Contractor shall accordingly ensure compliance by such Sub-Contractors with the terms hereof and Independent Contractor shall be liable for and remain responsible for all costs associated with such Sub- Contractors including but not limited to wages, salaries, and benefits.
- D. Independent Contractor agrees to indemnify and save and hold the Authority, their agents, and employees harmless from all claims or causes of action of liability arising from the performance of this Agreement by Independent Contractor. Independent Contractor agrees to defend and indemnify the Authority from and against

- any and all claims made by any person during or as a result of the performance of the duties described in this Agreement by Independent Contractor, Independent Contractor's employees, sub-contractors, agents or volunteers for stolen, damaged, lost or misplaced property of any kind.
- E. The Independent Contractor and all employees of the Independent Contractor shall be subject to a criminal background check.
- F. <u>Interest of Members of the Housing Authority</u>. No member of the governing body of the Housing Authority, and no other officer, employee, or agent of the Housing Authority who exercises any functions or responsibilities in connection with the carrying out of this Contract, shall have any personal interest direct or indirect, in this Contract.
- G. <u>Interest of Other Local Public Officials</u>. No member of the governing body of the locality in which the Housing Authority projects are situated and no other public official of such locality, who exercises any functions or responsibilities in the review or approval of the carrying out of this Contract, shall have any personal interest, direct or indirect, in this Contract.
- H. <u>Interest of Certain Federal Officials</u>. No member or delegate to the Congress of the United States, and no resident Commissioners, shall be admitted to any share or part of this Contract or to any benefit to arise therefrom.
- Interest of Independent Contractor. Independent Contractor (including partners, associates, and professional employees) covenants that she/he does not now have any interest and shall not acquire any interest, direct or indirect, in any Project of the Housing Authority or any other interest which would conflict in any manner or degree with the performance of his services hereunder. Independent Contractor further covenants that in the performance of his duties hereunder no person having any such interest shall be employed.
- J. <u>Equal Employment Opportunity</u>. During the performance of this Contract, Independent Contractor agrees as follows:
 - A. Independent Contractor will not discriminate against any employee or applicant for employment because of race, color, religion, national origin, disability, or age. Independent Contractor will take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex, national origin, disability, or age. Such action shall include but not be limited to the following: Employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. Contractor agrees to post in conspicuous places, available to employees and applicants for employment, notices to be provided by the Housing Authority setting forth the provisions of this nondiscrimination clause.
 - B. Independent Contractor will, in all solicitations or advertisements for employees placed by or on behalf of the Independent Contractor, state that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, national origin, disability or age.
- K. Anti-Lobbying Clause. During the performance of this Contract, the Independent Contractor agrees as follows:
 - A. No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with

the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative, agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.

B. If any funds other than federal appropriated funds have been paid or will be paid any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of congress in connection with this federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

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General Coverage: Insurance policies are to be secured by the Independent Contractor and always remain in full force and effect to provide protection against liability for damages which may be imposed due to liability of the Independent Contractor including, but not limited to, general liability and automobile liability insurance. Said amounts shall not be construed to limit the Independent Contractor's liability. The insurance requirements provided herein may be modified or waived in writing by the Authority provided the Authority determines that such waiver or modification does not unreasonably increase the risk of exposure to the Authority, including the fact that the Independent Contractor may be self-insured up to a certain acceptable amount.

<u>Vehicle Insurance</u>: The Independent Contractor shall obtain and maintain in full force and effect throughout the entire term of this Agreement a vehicle liability policy listing Authority as an additional insured party with a minimum limit of Three Hundred Thousand Dollars (\$300,000) per occurrence for bodily injury and One Hundred Thousand Dollars (\$100,000) per occurrence for property damage. The Authority recommended vehicle liability policy is One Million Dollars (\$1,000,000) per occurrence for bodily injury and Two Hundred Thousand Dollars (\$200,000) per occurrence for property damage but is not mandatory. Said insurance shall protect the Independent Contractor and the Authority from any claim for damages for bodily injury, including accidental death, as well as from any claim for property damage which may arise from operation of owned and non-owned vehicles. Copies of the policies or endorsements evidencing the above-required insurance coverage shall be filed with the Authority.

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Housing Authority of the City of Reno 1525 E 9th Street Reno NV 89512-3012 Phone: 775-329-3630

EIN: 88-6000260

JF Downey Realty Consulting & Advisory Services, LLC. 2780 Fargo Way

Sparks, NV 89434 Phone: 775-386-0039 EIN: 86-1300965

IN WITNESS WHEREOF, the parties have signed this Agreement to be effective the date entered on the first page hereon.

Housing Authority of the City of Reno

JF Downey Realty Consulting & Advisory Services, LLC.

Heidi McKendree Hilary Lopez Interim Executive Director/Contracting Officer Farrah E. Downey

CEO

RENO HOUSING AUTHORITY

AGENDA ITEM NUMBER: 7 March 28, 2023

SUBJECT: Possible adoption of Resolution 23-03-03 RH approving the content and

submission of the Authority's FY 2024 Moving to Work Annual plan and Certifications of Compliance to the U.S. Department of Housing and Urban

Development (HUD). (For Possible Action)

FROM: Executive Director RECOMMENDATION: For Possible Action

Background:

Staff is excited to have the FY 2024 Moving to Work (MTW) Annual Plan ready for your review and approval. An overview of the Authority's plan has been reviewed by members of the Resident Advisory Board, Resident Councils, and posted on the website for public review/comment beginning January 27, 2023. A public hearing to answer questions and receive comments was held on March 2, 2023. The public hearing was attended only by staff and no comments were received.

In FY 2024, the following two activities are being proposed:

1. Time-Limited Workforce Development Vouchers RHA believes that everyone, including youth and young adults, need stable housing, supportive services, and access to connections that will place them on the path to long-term success. In FY 2024, RHA proposes to assist Washoe County's younger population who have successfully completed a community-based education or life-skills program and are at risk of long-term housing instability. To do this, RHA will allow at least 15 tenant-based vouchers to be earmarked to house youth who want to achieve self-sufficiency. Currently, this population is largely unassisted by the agency's traditional housing programs and due to waitlist preferences in place, are very unlikely to receive a traditional voucher. Through this activity, RHA proposes to expand the services already provided to these youth with a structured, goal-oriented program that provides ongoing self-sufficiency support.

RHA's Workforce Development program is the cornerstone of the success of this activity. Consequently, direct referrals for Workforce Development Vouchers will be accepted from established non-profit partnering agencies specifically for these Workforce Development Vouchers. RHA's Workforce Development staff will accept the initial referral from the partnering agency and assist during the entire process from referral, admission, tenancy, and finally, self-sufficiency as they transition off housing assistance. As such, each applicant housed under this activity will receive a time-limited voucher of eight years and be required to participate in RHA's Workforce Development program.

2. Local Project Based Voucher Program

Throughout RHA's participation in MTW, the agency has proposed and implemented several activities directly related to PBVs. These activities allow for the assignment of PBVs to agency owned/controlled properties for ongoing partnerships, PBVs for privately owned properties, and the ability to assign PBVs to agency owned properties without going through a competitive process. This activity serves to combine all of RHA's current PBV activities into one Local Project Based Voucher Program. In doing so, identified program elements will remain in place or expanded upon.

In addition, the following amendments to current MTW activities are being requested:

Simplify rent calculations and increase the minimum rent In FY 2014, RHA raised the minimum rent from \$50 to \$75 not only to save significant HCV and PH operating subsidy but provide an incentive for participants to seek employment due to the higher participant contribution to rent. As of January 1, 2023, RHA has 212 households within its PH and HCV programs who are paying a minimum rent of \$75, 46% of these households pay a tenant rent of \$0.

In FY 2024, RHA proposes to raise the minimum rent to \$100. This increase will affect 240 households of which 12% will continue to pay a tenant rent of \$0. On average, affected households will experience a rent increase of \$17/month in the HCV program and \$15/month in the PH program.

As no group of residents will be exempt from the minimum rent, individuals who already have hardship exemptions will continue to be granted that exemption. Individuals who request an exemption may be granted one, based on RHA's standard hardship policy for an exception to minimum rent.

Landlord Incentive Program

Based on information received from landlords through a survey which noted barriers to their continued participation in the HCV program, RHA implemented a Landlord Incentive Program in FY 2018 that was expanded upon in FY 2020. The program allows landlords to receive their contracted HAP payment through the end of the month for units occupied by HCV participants vacating under the following conditions: (1) deceased tenant, (2) eviction, (3) skip, (4) a family responsibility violation, or (5) excessive damage to the unit that is beyond normal wear and tear.

In FY 2024, RHA will begin to provide the actual HAP amount through the end of the month as well as one additional month of full contract rent to landlords automatically regardless of the actual move-out date of the participant. Landlords can utilize the additional month of contracted rent toward damages incurred within the unit or as compensation for a vacancy loss.

To ensure landlords can maintain equal housing opportunities and follow their existing procedures, RHA does not require landlords to rent to another voucher holder to qualify for the Landlord Incentive Program. However, in FY 2024 RHA will utilize single fund flexibility to expand the Landlord Incentive Program and provide landlords with a \$500 re-lease bonus and a \$1,000 referral bonus. Based on this

expansion, current HCV landlords who sign a HAP contract to lease the same unit to another HCV program participant, will automatically receive a \$500 re-lease bonus. In addition, current landlords who refer a new landlord to the HCV program will be eligible for an automatic referral bonus. To qualify for the referral bonus, the new landlord must be one who has never leased to one of RHA's HCV program participants before.

To engage and retain current and future HCV landlords, RHA began reviewing various software companies who specialize in landlord relationships. In the coming year, RHA may use single fund flexibility to purchase software that will centralize landlord relationships, reduce housing search times, and expand housing opportunities.

Redetermination of rent reasonableness as a result of a change in contract rent
Based on the local rental market, RHA began waiving the requirement for a rent
reasonableness determination in FY 2019 if the new requested rent amount
represents a change of 10% or less. This policy change is anticipated to assist in
retaining landlords who continue to lease to HCV participants in this challenging
rental market and alleviate the amount of time required of staff to process requests.

During FY 2022, RHA processed 1,202 rent change requests of which 909 or 76% sought a change of 10% or less. Rent reasonableness determinations are still made by RHA staff on a regular basis. Staff continue to complete a rent reasonableness determination when a unit is placed under a HAP contract for the first time, when an owner requests a contract rent change of more than 10%, or at any other time RHA deems necessary.

In FY 2024, RHA proposes to allow for automatic approval of a CRI without a rent reasonableness redetermination if the requested rent change amount does not exceed RHA's payment standards.

The FY 2024 MTW Plan and Certifications of Compliance, approved by the Board, are due to HUD by April 15, 2023.

Your approval is requested.



MTW

Local • Innovative • Solutions

Posted for public review & comment on January 27, 2023.

Board of Commissioners

Dave Aiazzi *Chair*

Jazzmeen Johnson *Vice Chair*

Hillary Schieve

Mark Sullivan

Vacant

Management Team

Hilary Lopez, Ph.D. *Executive Director*

Heidi McKendree

Deputy Executive Director

Jamie Newfelt

Director of Rental Assistance

Kristin Scott

Director of Asset Management

Vacant
Director of Development

Linda Long
Director of Administration

Cori Fisher

Director of Resident Services

Darren Squillante
Director of Human Resources

Samantha Arellano
Director of Information Technology

About

Founded in October 1943, the Housing Authority of the City of Reno (RHA) owns and manages 751 units of Public Housing in eight different locations in the City of Reno and City of Sparks. Using Neighborhood Stabilization Programs (NSP) and other funding, RHA acquired and manages over 160 scattered site rental properties specifically targeted for low-income households. RHA also provides housing subsidies to more than 2,500 low-income families in Reno, Sparks, and Washoe County through various rental assistance programs.

Mission

Provide fair, sustainable, quality housing in diverse neighborhoods throughout Reno, Sparks and Washoe County that offers a stable foundation for low-income families to pursue economic opportunities, become self-sufficient and improve their quality of life.

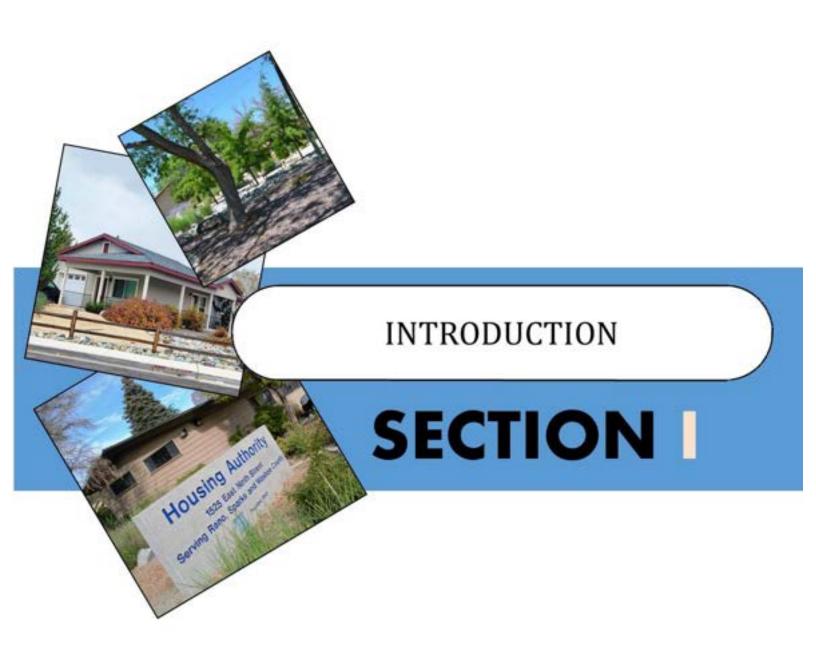
Housing Authority of the City of Reno 1525 East Ninth Street Reno, NV 89512-3012 www.renoha.org



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I. Introduction

A. What is MTW?

MTW is a demonstration program, established by Congress in 1996, that offers a limited number of "high performing" Public Housing Authorities (PHAs) the opportunity to propose and test innovative, locally designed approaches to administering housing programs and self-sufficiency strategies. The program permits PHAs to combine federal funds from the Public Housing (PH) operating fund, Capital Fund Program (CFP) and Housing Choice Voucher (HCV) program into a single, agency-wide funding source known as a "block grant." This block grant approach allows MTW PHAs to allocate resources based on a local determination of how to effectively address the needs of the local community. It is important to note that the MTW designation does not provide PHAs with additional funding from the U.S. Department of Housing and Urban Development (HUD), but rather allows each agency to use their funding in a more flexible manner.

With HUD's approval, PHAs participating in the MTW program can waive certain statutes and regulations in the United States Housing Act of 1937 to explore different and creative ways to improve their housing programs. These policy changes allow PHAs to address challenges for low-income families that are unique to their local needs. In doing so, each of the activities proposed and implemented must address at least one of three MTW statutory objectives.

MTW Statutory Objectives

- Increase housing choices for low-income families.
- 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.
- Reduce costs and achieve greater cost effectiveness in federal expenditures.

B. RHA's designation as an MTW agency

After a national competition was held in 2012, RHA was selected and designated as one of four new MTW agencies in 2013. The MTW agreement between RHA and HUD was executed on June 27, 2013. The executed agreement established RHA as an MTW agency through RHA's FY 2018. On April 14, 2016, RHA received notice that pursuant to Section 239 of Title II, Division L of the Consolidated Appropriations Act, 2016, RHA's current MTW agreement with HUD was extended through the end of FY 2028.

C. FY 2024 MTW Annual Plan overview

FY 2024 (i.e., the period from July 1, 2023 through June 30, 2024) will be RHA's eleventh year as an MTW agency. Each year RHA is required to adopt an MTW Annual Plan for HUD's approval in advance of the start of the fiscal year. This plan, which is organized according to HUD's requirements as outlined in Form 50900, explains the proposed/amended MTW activities for the coming year, and provides updates on current MTW activities that have already received approval



from HUD. For this plan, an "MTW activity" is defined as any activity that requires MTW flexibility to be utilized to waive statutory or regulatory requirements.

The MTW Annual Plan is intended to provide PH residents, HCV participants, local officials, the public, and HUD with pertinent information on each of RHA's proposed and implemented activities. It also serves to provide stakeholders with details on RHA's operating budget and capital improvement plans.

As part of RHA's planning process, staff began discussing the FY 2024 MTW Annual Plan, including each of the proposed/amended activities and potential PH repositioning strategies, during Resident Advisory Board and Resident Council meetings in January 2023. Public review and comments are then solicited prior to consideration and approval by RHA's Board of Commissioners. Following approval from the Board of Commissioners, RHA's FY 2024 MTW Annual Plan is submitted to HUD for review.¹

D. Overview of RHA's annual goals and objectives

During its ten years as an MTW agency, RHA implemented activities intended to simplify the administration of both the PH and HCV programs. These activities include, but are not limited to, simplifying medical deductions in both PH and the HCV program, implementing true triennial recertifications for elderly/disabled participants on fixed incomes and waiving rent reasonableness determinations under certain conditions in the HCV program. Furthermore, RHA created a Landlord Incentive Program within the HCV program, began providing an incentive to \$0 Housing Assistance Payment (HAP) households and received approval to use its funding flexibility for Affordable Housing Acquisition, Rehabilitation and Preservation.

Throughout RHA's participation in the MTW Demonstration, staff have continued to seek innovative activities that are designed to streamline resident requirements and increase the overall efficiency of the agency. To identify ways that approved MTW activities might be improved upon, staff continue to monitor activities following full implementation.

RHA's proposed/amended FY 2024 MTW activities

RHA is proposing the following new MTW activities in FY 2024:

- Time-Limited Workforce Development Vouchers
 RHA is proposing to establish a partnership referral program that would allow the agency to provide time-limited housing assistance to clients referred by one of RHA's non-profit partners.
- Local Project Based Voucher Program
 RHA is implementing several activities surrounding Project Based Vouchers (PBV). Through
 this activity, RHA is proposing to consolidate each of its implemented PBV activities into one
 Local Project Based Voucher Program activity.

Additional details on RHA's public process can be found in Section VI of this plan and the accompanying attachments.



In addition, RHA is amending the following activities in FY 2024 which were previously approved by HUD:

- Simplify rent calculations and increase the minimum rent In 2014, RHA raised the minimum rent from \$50 to \$75 to save HCV HAP expense and PH operating subsidy. Based on current rental market conditions, RHA proposes to increase the minimum rent in FY 2024 to \$100.
- Landlord Incentive Program
 - RHA will amend this activity to allow for an automatic payment of the second month to the landlord. Furthermore, the payment amount will be modified to ensure the landlord receives the actual contract rent amount for the unit rather than the monthly HAP amount. In addition, to provide more of an incentive to landlords who lease to RHA's HCV participants, RHA is proposing to implement a re-lease bonus and a landlord referral bonus.
- Redetermination of rent reasonableness as a result of a change in contract rent RHA will continue to waive the requirement for rent reasonableness determinations provided that the new requested rent amount is a change of 10% or less but proposes to automatically approve requests that are at or below the current HCV payment standard.

MTW goals and objectives

Utilizing the flexibilities available through MTW to expand housing choice, streamline agency operations and develop creative solutions that meet the needs of low-income families in our community remains an ongoing goal of RHA. New initiatives that further both the MTW statutory objectives and RHA's strategic plan will continue to be explored and proposed if feasible.

In November 2022, RHA's Board of Commissioners identified several short-term goals for the agency in the coming year. In FY 2024, leadership will work to address the following specific goals:

- Identify and order the development of future housing projects and provide a financial plan for each development identified
- Increase staffing, reclassify internal positions, and grow employee retention programs as needed
- Develop a portfolio plan for RHA's scattered housing sites
- Begin PH asset repositioning
- Expand RHA's resident services programs

Recently RHA began reviewing its portfolio analysis which was updated based on information provided through a capital needs assessment. The goal of this review is to identify ways RHA can sustain its housing portfolio over time. At this time, several repositioning options are being considered for RHA's PH sites including Section 18 Demolition/Disposition and conversion to HUD's Rental Assistance Demonstration (RAD). Under some conditions, HUD allows these tools to be used in tandem, offering even greater opportunities for long-term preservation.

The RAD program allows housing authorities, with HUD approval, to convert properties from one federal funding platform, Section 9 PH operating subsidy, to another, project-based rental subsidy



within the HCV program. By doing this, PHAs can leverage public and private debt and equity to reinvest in the PH stock. Moving to project-based rental subsidy ensures a more stable, long-term funding source for operating the property and provides opportunities for new investment to rehabilitate aging buildings. Except for any temporary relocation to accommodate major repairs, a RAD conversion is essentially seamless for residents as the following protections are written directly into the RAD requirements:

- Residents have the right to return to the property after work is complete should they need to move out for any renovations.
- Residents are not rescreened and do not lose eligibility.
- Rent calculations remain at 30% of adjusted income.
- Resident processes and rights remain the same, including the grievance process and funding for resident organizations.

Section 18 of the 1937 Housing Act allows for the demolition or disposition of public housing if the property meets certain conditions. Demolition means the removal, in whole or in part, of one or more permanent buildings of a public housing development. Disposition means the conveyance or other transfer by the PHA, by sale or other transaction, of any interest in the real estate of a public housing development.

Disposition under Section 18 describes a process where an existing public housing project is removed from the federal public housing platform to a more sustainable financing program. This repositioning also allows the PHA to apply for Tenant Protection Vouchers (TPVs), which can also allow the agency to leverage more debt for improvements. Like RAD, resident consultation is also a requirement under Section 18, including consultation with:

- Residents who may be affected by the demolition or disposition action.
- Resident organizations for the affected project, if any.
- PHA-wide resident organizations, if any.
- The Resident Advisory Board or equivalent body.

Under Section 18, the PHA must also ensure communications and materials are accessible to individuals with disabilities and take reasonable steps to provide meaningful access to persons with Limited English Proficiency (LEP).

In the coming months, RHA will begin to apply to reposition its PH properties through Section 18 Demolition/Disposition, RAD or a RAD/Section 18 Blend. Each application will follow the prescribed disclosure and public/resident engagement process required by HUD. As resident engagement is required before and during the process, RHA's residents will be the first to know when the applications for any repositioning strategy have been submitted.



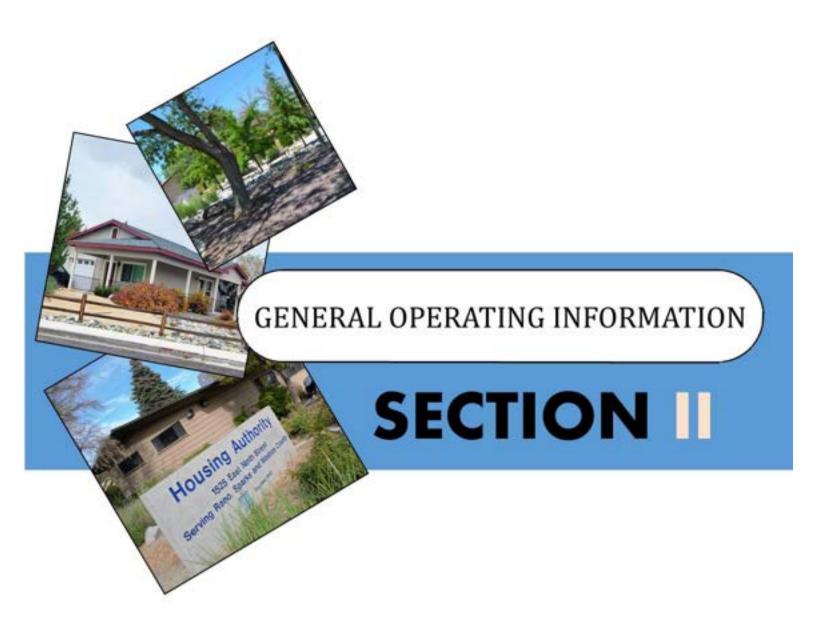
As of January 1, 2023, the following repositioning strategies are being considered for each of RHA's PH properties:

Property Name	AMP	# of Units	Repositioning Strategy
Havely View Aportments	NV39-P001-007	99	Section 18
Hawk View Apartments		99	Demolition/ Disposition
Stead Manor	NV39-P001-006	67	RAD
Silverada Manor	NV39-P001-003	149	RAD / Section 18 Blend
Essex Manor	NV39-P001-009	105	RAD
John McGraw Court	NV39-P001-018	34	RAD
Mineral Manor	NV39-P001-001	144	Section 18
Milleral Wallor		144	Demolition/ Disposition
Tom Courses Willows	NV39-P001-002	100	Section 18
Tom Sawyer Village		100	Demolition/ Disposition
Myra Birch Manor	NV39-P001-010	56	RAD

Non-MTW goals and objectives

Non-MTW goals and objectives are those activities that do not require MTW authority or flexibility to implement. In addition to its planned MTW goals and objectives, RHA will:

- Review and update the HCV payment standards to ensure viability with the area's rental market and maintain adequate lease up levels within the HCV program.
- Continue to evaluate RHA's scattered site portfolio including appraised value, capital needs, operating efficiency, energy efficiency, etc. Once complete, a strategy will be developed to determine appropriate uses which may include homeownership, non-profit partnerships, and continued operation as affordable housing for those without rental assistance.
- Continue to work toward increasing staff efficiencies by fully implementing an Electronic Document Management System (EDMS) that will manage the use and storage of documents created throughout the organization.
- Fully implement a new software system to automate workflows and streamline agency operations.

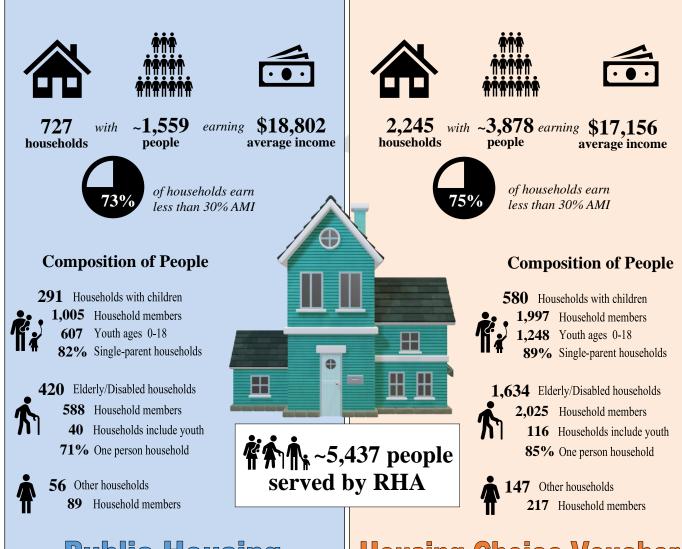




II. General Operating Information

RHA's Housing Assistance Programs

On January 1, 2023, RHA was providing housing assistance to 2,972 active households through its PH and HCV programs.



Public Housing

RHA currently owns and manages 751 units of PH in eight different locations in the City of Reno and the City of Sparks for eligible low-income families, the elderly, and persons with disabilities.

Housing Choice Voucher

RHA administers several rental assistance programs created under Section 8 of the 1974 Federal Housing and Community Development Act. Through this program, RHA provides housing subsidies to low-income families and individuals living in privately owned housing in Reno, Sparks and Washoe County.



In addition to households assisted through its PH and HCV programs, RHA works closely with the local Department of Veterans Affairs (VA) office to provide assistance to over 400 veterans through the HUD-VA Supportive Housing (VASH) Program. Recently, RHA was also awarded 137 Emergency Housing Vouchers to assist unsheltered community members with housing and 15 vouchers through the Foster Youth to Independence Program.

Utilizing NSP along with other funding sources, RHA acquired over 200 scattered site properties throughout the local area; 166 of these properties are still a part of the agency's housing portfolio. Most of these scattered site rental properties are allocated specifically for very low-income households. In addition to these scattered site units, RHA owns nine unaided multi-family housing properties. Working with a private property management company, these nine properties provide an additional 376 housing units. Although not required to do so, RHA leases each of these properties at levels that are lower than HUD's Fair Market Rents (FMRs) for Washoe County.

This section includes RHA's general housing stock, lease-up, and wait list information.

A. Housing Stock Information

i. Planned New Public Housing Units

RHA will not be adding any new PH units in FY 2024.

ASSET MANAGEMENT PROJECT (AMP) FILL IN NAME AND NUMBER	0/1 Bdm	2 Bdm	3 Bdm	4 Bdm	5 Bdm	6+ Bdm	TOTAL UNITS	POPULATION TYPE**	Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing/ Vision)
Name/Number	0	0	0	0	0	0	0	N/A	0	0
Name/Number	0	0	0	0	0	0	0	N/A	0	0
Name/Number	0	0	0	0	0	0	0	N/A	0	0

Total Public Housing Units to be Added in the Plan Year: 0

If "Panillatian Tyne" is "Other" nlease descrip	on Type" is "Other" please descri	ease desci	()ther" nleas	ic '	T'vne"	lation	f "Ponul	Ιŧ
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^{*} The federal accessibility standard under HUD's Section 504 regulation is the Unifor Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance (24 CFR 8.32). HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice") for purposes of Section 504 compliance, https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf

^{**} Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other



ii. Planned Public Housing Units to be removed

Over the past year, RHA has been exploring all options to reposition its PH portfolio including RAD and Section 18 Demolition/Disposition. Currently, RHA has no pending or approved applications under RAD or Section 18, however, in FY 2024, RHA will begin to apply to HUD to participate in one, both or a blend of repositioning strategies for its PH properties. As of January 1, 2023, Section 18 Demolition/Disposition is being considered for Hawk View Apartments, Mineral Manor, and Tom Sawyer Village.

A "substantial amendment" to the MTW Annual Plan is attached, which captures the proposed changes to the PH portfolio. This includes identifying the planned PH units to be removed and the number of new PBVs to be assigned.

In FY 2024, RHA plans to remove the following PH units:

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Hawk View Apartments NV39P001007	99	In FY 2024, RHA plans to submit an application for Section 18 Demolition/Disposition on this property.
Silverada Manor NV39P001003	149	In FY 2024, RHA plans to submit an application to convert all units at this senior/disabled property to PBV utilizing RAD and a Section 18 Blend.
Essex Manor NV39P001009	105	In FY 2024, RHA plans to submit an application to convert all units at this family property to PBV utilizing RAD.
TOTAL: Public Housing Units to be removed in the Plan Year	353	



iii. Planned New Project-Based Vouchers

In FY 2024, RHA anticipates project-basing the following properties pursuant to the agency's repositioning strategies. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year. It also indicates whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED		DESCRIPTION OF PROJECT
Hawk View Apartments	99	N	PH family site that will likely be repositioned through Section 18 Demolition/Disposition, although a RAD PBV Section 18 Blend may also be considered.
Silverada Manor	Silverada Manor 149		PH senior/disabled site that will be repositioned using RAD PBV/Section 18 Blend.
Essex Manor	105	Y	PH family site that will be converted to PBV assistance following RAD conversion.

TOTAL: Planned new Project Based Units in Plan Year



iv. Existing Project Based Vouchers

RHA is currently project-basing the following tenant-based vouchers in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. It also indicates whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Mobility Demonstration	22	Leased/Issued	No	PH tenants in good standing are being allowed to move to RHA's scattered site properties on a PBV.
Single-Family Home Project-Based Vouchers	10	Leased/Issued	No	RHA has several single-family homes which are shifted to a PBV if/when the unit becomes vacant.
Yorkshire Terrace	12	Leased/Issued	No	RHA has assigned PBVs to units at Yorkshire Terrace, a 30-unit Low Income Housing Tax Credit (LIHTC) property.
Partnerships	10	Leased/Issued	No	RHA has formalized agreements with nonprofit community partners and property owners to provide affordable housing.
Willie J. Wynn Apartments	12	Leased/Issued	No	Affordable housing development designed specifically to support seniors aging in place.
Privately Owned Partnerships	33	Leased/Issued	No	Privately owned properties being assigned PBVs through a competitive process.
Pilgrims Rest	7	Leased/Issued	No	Privately owned senior complex managed by RHA.
VASH PBV	75	Leased/Issued	No	Privately owned properties have been assigned VASH PBVs.
TOTAL:				

TOTAL:	
Planned existing	181
Project-Based Vouchers	

^{*} Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued



v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

RHA plans to continue to purchase or repurpose single family homes, duplexes, and condominiums for use with PBVs. Scattered site properties in low poverty neighborhoods, either currently owned or yet to be acquired, may be identified for use in RHA's Mobility Demonstration. All other properties acquired or repurposed may be used to provide additional housing choice to low-income families through RHA's PBV program.

RHA is also considering the redevelopment of a six-unit existing RHA owned unaided property utilizing 12 of RHA's 13 available Faircloth Public Housing units. RHA's decision is dependent on funding applications currently submitted, but not yet awarded. If Faircloth units are utilized, RHA would conder a Faircloth to RAD conversion.

vi. General Description of All Planned Capital Expenditures during the Plan Year

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING PLAN YEAR

RHA is planning work on the following capital fund project in FY 2024.

- HVAC equipment replacement expected FY 2021 expenditure: \$304,000 HVAC equipment will be replaced at McGraw Court.
- RHA will be utilizing remaining FY 2022 and possibly FY 2023 Capital Funds to support relocation and/or other conversion expenses.



B. Leasing Information

i. Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	8,676	723 ²
MTW Housing Choice Vouchers (HCV) Utilized	27,936	$2,328^3$
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	516	434
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served:	37,128	3,094

^{* &}quot;Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

[^] 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 MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	N/A	0	0
Property-Based	2021-03: Partnership to Assist Homeless Youth	516	43
Homeownership	N/A	0	0

^{*} The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

^{** &}quot;Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year.

RHA has 751 ACC units. Lease up is not anticipated to drop below 723 units, or 97% of the MTW baseline of 745. If/when RHA is approved for a RAD conversion, the actual number of households served may fall below the number planned as units are held to accommodate the conversion process.

RHA has 2,547 ACC Housing Choice Vouchers. Although our goal is 100% of the established baseline of 2,477, RHA anticipates leasing this program at 94% in the coming year.

⁴ Eddy House has 43 shelter beds; a portion of which are allocated specifically to house youth on a semi-permanent basis up to six months.



ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	RHA continues to select applicants off the waiting list based on preferences set forth in the Admissions and Continued Occupancy (ACOP) for Public Housing for referral to vacant PH units. Throughout FY 2022, RHA leased this program at 98.13% of the MTW baseline and is currently on track to maintain this lease up figure. Although there are currently no anticipated leasing issues in this program, this may change if/when RHA begins to reposition its PH portfolio which results in units being held offline.
MTW Housing Choice Voucher	RHA continues to monitor its payment standards in relation to rental market conditions and promote the Landlord Incentive Program. In FY 2019, based on feedback provided from the local HUD Field Office, RHA implemented a "lease in place" preference for applicants on the waiting list. This preference will continue in the coming year. In FY 2022, RHA leased this program at 93.13% of the MTW baseline, up from 92.26% in FY 2020. Although RHA in currently on track to maintain current lease up figures within this program in FY 2023, staff continues to explore additional solutions that could lead to increased HCV lease up numbers.
Local, Non-Traditional	Although RHA does not anticipate any leasing issues related to Activity 2021-03, it is designed to assist homeless youth in both a community living space and 24-hour drop-in center. The very transient nature of the at-risk population being served make it difficult to anticipate any leasing issues that may be encountered.

C. Wait List Information

The following table reflects RHA's wait list information as of January 5, 2023.

i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
CV Public Housing	1-, 2-, 3- & -4-bedroom units servicing all populations	2,644	Closed	If needed
Stead	2- & 3-bedroom units located at Stead Manor serving all populations	1,120	Closed	If needed



Elderly & Disabled Public Housing	Studio, 1- & 2-bedroom units serving disabled and/or applicants age 55+	2,097	Closed	If needed
HCV	Housing Choice Voucher Program serving all populations	3,602	Closed	If needed
Project-Based Voucher	Unit Based Voucher serving all populations	2,359	Closed	If needed

Please describe any duplication of applicants across waiting lists:

At the time of application, clients may apply for all open waiting lists. Therefore, the number of households reported will reflect some households who have applied for more than one program and/or bedroom size.

ii. Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
All Waiting Lists	All RHA waiting lists will be opened and closed as needed.
Public Housing Waiting Lists	With the conversion to a new database processing software system estimated to be completed in FY 2024, RHA will convert its Public Housing waitlist to site-based waitlists. RHA will follow all HUD regulations regarding notification of applicants currently on impacted waitlists.





III. Proposed MTW Activities

This section describes RHA's proposed MTW activities for the coming year. Information is included on which MTW statutory objective(s) will be achieved, the anticipated impact of the proposed activity on the stated objective(s) and the anticipated schedules for achieving the stated objective(s). It also details specific waivers to be used along with data collection and evaluation criteria, if applicable.

RHA is proposing the following MTW activities in FY 2024:

2024-01: Time-Limited Workforce Development Vouchers

A. Activity Description

Reno, Sparks and Washoe County, like many communities across the U.S., continue to see members of its population experience homelessness. Increased demand for housing tightened the community's rental market, which, in many ways, made it harder for low-income residents to find affordable units. On a single night in Washoe County at the beginning of 2022, 1,605 people overall were counted as homeless including 417 who were unsheltered - sleeping outside, in a car, or someplace not meant for human habitation. Furthermore, 1,188 people were counted in emergency or transitional housing. Unfortunately, this also included youth⁵.

On this same night, 207 youth were counted as homeless in Washoe County. Of those, 29% were between the ages of 18 to 24 and 6% of this same age group were unsheltered. Sadly, the number of overnight shelters specifically for young people in Washoe County is limited. For those looking to stay out of homelessness, there are a few transitional housing providers who provide temporary housing with supportive services to individuals experiencing homelessness. The goal of these programs are interim stability and support to successfully move to and maintain permanent housing. However, according to *An In-Depth Guide of Homelessness in Washoe County*, "the robust continuum of care (community plan to organize and deliver housing and services to meet the specific needs of homeless people as they move into stable housing and maximize their self-sufficiency) needed to provide everyone who needs it with housing simply does not exist."

RHA believes that everyone, including youth and young adults, need stable housing, supportive services, and access to connections that will place them on the path to long-term success. In FY 2024, RHA proposes to assist Washoe County's younger population who have successfully completed a community-based education or life-skills program and are at risk of long-term housing instability. To do this, RHA will allow at least 15 tenant-based vouchers to be earmarked to house youth who want to achieve self-sufficiency. Currently, this population is largely unassisted by the agency's traditional housing programs and due to waitlist preferences in place, are very unlikely to receive a traditional voucher. Through this activity, RHA proposes to expand the services already

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⁵ https://www.hudexchange.info/resource/6291/2020-ahar-part-1-pit-estimates-of-homelessness-in-the-us/

⁶ https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/transitional-housing/

An In-Depth Guide of Homelessness in Washoe County was prepared by Baran, L., Colling, K., & DuPea, M.



provided to these youth with a structured, goal-oriented program that provides ongoing self-sufficiency support.

RHA's Workforce Development program is the cornerstone of the success of this activity. Consequently, direct referrals for Workforce Development Vouchers will be accepted from established non-profit partnering agencies specifically for these Workforce Development Vouchers. RHA's Workforce Development staff will accept the initial referral from the partnering agency and assist during the entire process from referral, admission, tenancy, and finally, self-sufficiency as they transition off housing assistance. As such, each applicant housed under this activity will receive a time-limited voucher of eight years and be required to participate in RHA's Workforce Development program.

How does this achieve one or more of the statutory objectives(s)? Implementation of this activity will provide 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.

Anticipated impact of the proposed MTW activity on the stated objective RHA anticipates that implementation of this activity will provide at least 15 at-risk youth with permanent housing and access to supportive services through their participation in RHA's Workforce Development Program. Through ongoing participation, the activity is expected to increase employment opportunities, savings, and build wealth among these participants. It is also anticipated that it will improve the number of households transitioning to the final phase of self-sufficiency.

Anticipated schedule for implementing the proposed activity

Following HUD's approval of this activity, RHA will use a competitive process to solicit partnering agencies within the community. As Workforce Development staff will be the single point of contact for referral, each partnering agency will work directly with this department to begin the Admissions process. Due to the time-limited nature of these vouchers, Workforce Development staff will meet with potential participants prior to referral to explain the voucher and corresponding expectations for participation in the Workforce Development program. Once a voucher has been issued, RHA anticipates its partnering agencies will assist their client with their housing search. Finally, RHA's partners must provide the support necessary to ensure their client can overcome any barriers encountered when securing the unit (i.e.., security deposits, rental history, etc.).



B. Activity Metrics

The following Standard HUD Metrics were identified and will be tracked for this activity:

2024-01 SS #1: Increase in Household Income			
Unit of Measurement	Baseline	Benchmark	
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy after implementation of the activity (in dollars).	
Average earned income of households referred for a Workforce Development voucher.	\$0	\$30,000 by year 5	

2024-01 SS #2: Increase in Household Savings			
Unit of Measurement	Baseline	Benchmark	
Average amount of savings/escrow of households affected by this policy in dollars (increase).	Average savings/escrow of households affected by this policy prior to implementation of the activity (in dollars).	Expected average savings/escrow of households affected by this policy after implementation of the activity (in dollars).	
Average amount of savings/ escrow of households referred for a Workforce Development voucher.	\$0	\$6,000 by year 5	

2024-04 SS #3: Increase in Positive Outcomes in Employment Status

Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity. **Unit of Measurement Baseline Benchmark** Head(s) of households prior to Expected head(s) of households in implementation of the activity after implementation of the activity (number). (number). 0 **Employed Full-Time** 15 by year 5 **Employed Part-Time** 0 0 Enrolled in an Educational 0 0 Program Enrolled in Job Training 0 0 Program

Unemployed

Other

15

N/A

0 by year 5

N/A



2024-01 SS #5: Households Assisted by Services that Increase Self-Sufficiency			
Unit of Measurement	Baseline	Benchmark	
Households assisted by services that increase self-sufficiency (increase).	Households receiving self- sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number)	
Number of Workforce Development voucher households assisted by services that increased self-sufficiency.	0	15	

2022-01 SS #8: Households Transitioned to Self-Sufficiency

RHA looks at self-sufficiency in two phases. The first phase occurs as household members maintain consistent employment for 12 months or when a reduction in subsidy results in the household being responsible for more than 50% of the rent. The final phase of self-sufficiency occurs automatically once the household is no longer receiving assistance or when the household voluntarily ends participation.

For this plan and subsequent reporting, only those households are no longer receiving assistance or who voluntarily end participation are counted toward the established benchmark.

Unit of Measurement	Baseline	Benchmark
Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency prior to implementation of the activity (number).	Expected households transitioned to self-sufficiency after implementation of the activity (number).
Number of Workforce Development voucher households who successfully transitioned to self-sufficiency.	0	15 ⁸

Data source from which the metric data will be compiled

RHA will utilize its software system to track participating households internally throughout the year to note any changes in family circumstances that prevent Workforce Development Voucher participants from securing employment, increasing earned income, and potentially becoming self-sufficient.

C. Cost Implications

As each of these young adults will be issued a tenant-based voucher following referral, RHA does not anticipate any additional cost implications related to this activity.

RHA does not anticipate households to transition to self-sufficiency until their graduation from the Workforce Development program or by the eighth year of participation, whichever is sooner.



D. Need/Justification for MTW Flexibility

Note: All references to authorizations are to the section and paragraph citation of Attachment C of the Standard MTW Agreement.

This activity requires the following authorizations to allow RHA to issue term-limited vouchers, accept direct referrals from RHA's non-profit partnership, and establish and operate its self-sufficiency and training programs exempt from certain HUD requirements. It also allows for the required participation in RHA's Workforce Development Program.

Authorizations Related to Section 8 Housing Choice Vouchers Only

- D.1. Operational Policies and Procedures

 The Agency is authorized to determine basic operational policies and procedures for all Section 8 assistance the Agency is provided under section 8(o) of the 1937 Act.
 - D.1.b. The Agency is authorized to determine the length of the lease period when vouchers expire and when vouchers will be reissued. This authorization waives certain provisions of Section 8(o)(7)(a), 8(o)(13)(F) and 8(o)(13)(G) of the 1937 Act and 24C.F.R. §§982.303, 982.309, and 983 Subpart F.
 - D.1.c. The Agency is authorized to define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations. *This authorization waives certain provisions of Section* 8(0)(5) of the 1937 Act and 24 C.F.R. §982.516.

D.2. Rent Policies and Term Limits

D.2.d. The Agency is authorized to implement term limits for HCV units designated as part of the MTW demonstration. *This authorization waives certain provisions of Sections* 8(o)(7) *and* 8(o)(13)(F)-(G) *of the 1937 Act and 24 C.F.R.* § 982 Subpart L and 983 Subpart E.

D.4. Waiting List Policies

The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(6), 8(o)(13)(J), and 8(o)(16) of the 1937 Act and 24 C.F.R. §§982 Subpart E, 982.305 and 983 Subpart F.

Authorizations Related to Family Self-Sufficiency

E. The Agency is authorized to operate any of its existing self-sufficiency and training programs, including its Family Self-Sufficiency (FSS) Program and any successor programs exempt from certain HUD program requirements. These may include those requirements governing program size or participation, including whether to establish escrow accounts and other rent incentives and whether to establish mandatory self-sufficiency participation requirements. If the Agency receives dedicated funding for an FSS coordinator, such funds must be used to employ a self-sufficiency coordinator. In



developing and operating such programs, the Agency is authorized to establish strategic relationships and partnerships with local private and public agencies and service providers to leverage expertise and funding. However, notwithstanding the above, any funds granted pursuant to a competition must be used in accordance with the NOFA and the approved application and work plan. *This authorization waives certain provisions of Section 23 of the 1937 Act and 24 CFR §984*.

Rent Reform Information

Impact Analysis

As these youth will be referred directly by RHA's non-profit partners, there is no impact anticipated on current HCV participants. RHA does anticipate that once housed and actively participating in the Workforce Development Program, these young adults will experience an increase in financial wealth and personal welfare as they work toward becoming self-sufficient.

To assess an individual's progress toward becoming self-sufficient over the eight-year period, they will be required to join the Workforce Development Program within six months of lease up. Participation in the program is essential to assessing whether progress is being made toward becoming self-sufficient prior to the expiration of their housing assistance. Consequently, should a referral for one of the Workforce Development Vouchers fail to join the Workforce Development Program or become inactive in the program for six consecutive months, RHA staff will initiate termination of assistance. At the end of the eight-year time limit, the individual will be terminated from assistance; however, they can then re-apply to the HCV Program, for placement according to existing waiting list preferences.

Hardship Case Criteria

The hardship policy for the end of assistance will be very limited. If the head or co-head of the family becomes disabled or experiences another life changing event that would require continued housing assistance, a three-person committee will review each request and decide whether an unrestricted voucher will be issued. Other than that, there will be no hardship exemptions from the eight-year limitation.

Description of Annual Reevaluation

RHA will track and evaluate the changing statuses of these young adults to determine whether progress is being made to become self-sufficient prior to voucher expiration.

Transition Period

This activity does not require a transition period. RHA anticipates these vouchers will be issued to at-risk youth following a successful competitive process to establish referring partners.



2024-02: Local Project Based Voucher Program

A. Activity Description

Throughout RHA's participation in MTW, the agency has proposed and implemented several activities directly related to PBVs. These activities allow for the assignment of PBVs to agency owned/controlled properties for ongoing partnerships, PBVs for privately owned properties, and the ability to assign PBVs to agency owned properties without going through a competitive process. This activity serves to combine all of RHA's current PBV activities into one Local Project Based Voucher Program. In doing so, the following program elements will remain in place or be expanded upon:

- To assist in providing additional housing choice for low-income families and allow RHA to make additional dwelling units available, RHA will continue to assign PBVs to non-Public Housing RHA owned/controlled dwelling units without going through the competitive process. Initial contract rents which are at or below the applicable low HOME rents will be set by RHA rather than going through a state-certified appraiser and a HUD-approved independent agency.
- RHA staff conduct inspections on all HCV and PBV units (*Activity 2015-02*) rather than using third party contractors, regardless of ownership or property management status. This policy will remain in effect and apply to all PBV units.
- Per 24 CFR §983.56, PBV assistance for units in a project cannot exceed more than 25% of the number of dwelling units (assisted or unassisted) in the project. In addition, 24 CFR §983.6 specifies that PHAs are limited to project-basing up to 20% of the amount of budget authority allocated to the PHA by HUD in the PHA voucher program. RHA will continue to remove the 25% cap on the number of PBVs that could be allocated to a non-Public Housing RHA-owned property and expand this flexibility to any property awarded PBVs through RHA's competitive process. Furthermore, RHA will also continue to eliminate the 20% limit on the amount of voucher funding that may be utilized under its PBV program.
- RHA will continue to expand its PBV program and allocate PBVs to privately owned properties in exchange for the owner's commitment to provide affordable housing to agency identified at risk populations. Local non-profits and developers can compete for the opportunity to receive an allocation of PBVs which will provide a minimum of a 15-year HAP contract providing rental subsidy to expand affordable housing units. If applicable, each applicant property owner must commit to accepting referrals from RHA's partnering service providers with whom a Memorandum of Understanding (MOU) outlining the provider's responsibilities has been executed. The service provider has agreed to provide the necessary case management to assist each of the individuals and/or families with their long-term stability. The applicant property owners must also agree to work collaboratively with the partnering service provider.

Households referred and assisted with PBVs under this activity will be subject to the regular operational/rent policies that RHA has in place. If necessary, a waiting list may be established and maintained by applicant property owners in compliance with RHA's standards.



In addition, RHA proposes to expand its PBV waivers to allow for floating units within complexes. RHA will certify all floating units meet HQS protocols required by HUD by inspecting a representative sample of 20% of the units in each building, at a minimum. Additionally, as RHA has already waived the limitations put in place by the project caps and budget authority, RHA proposes to simplify the PBV approval process and allow RHA's Board of Commissioners to assign PBVs to both RHA owned/controlled non-PH units and competitively bid PBV units rather than requiring HUD's approval of each property. To ensure compliance, RHA will continue to conduct each of the required elements to apply for a PBV including neighborhood site standards, HQS inspections, rent reasonableness, subsidy layering reviews, and environmental reviews, as required, prior to Board approval.

How does this achieve one or more of the statutory objectives(s)? This activity is expected to reduce costs and achieve greater cost effectiveness in federal expenditures <u>and</u> increase housing choice for low-income families.

Anticipated schedule for implementing the proposed activity
As many of the elements of this activity are already in place, it will be implemented following HUD's approval of this plan.

B. Activity Metrics

The following Standard HUD Metrics were identified when the activities were initially proposed/approved and will continue to be tracked for this activity:

2024-02 CE #1: Agency Cost Savings		
Unit of Measurement	Baseline	Benchmark
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).
Total cost of assigning PBVs to agency owned units without a competitive process.	\$720/property	\$0

2024-02 HC #4: Displacement Prevention			
Unit of Measurement	Baseline	Benchmark	
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	Number of households prior to implementation of the activity.	Expected number of households after implementation of the activity.	
Number of households at or below 80% AMI that would lose assistance or need to move.	0	0	



2024-02 HC #5: Increase in Resident Mobility		
Unit of Measurement	Baseline	Benchmark
Number of households able to move to a better unit and/or neighborhood of opportunity (increase).	Number of households prior to implementation of the activity.	Expected number of households after implementation of the activity.
Number of households able to move to a better unit and/or neighborhood of opportunity.	0	50

2024-02 HC #7: Households Assisted by Services that Increase Housing Choice		
Unit of Measurement	Baseline	Benchmark
Number of households receiving services aimed to increase housing choice (increase).	Number of households prior to implementation of the activity.	Expected number of households after implementation of the activity.
Number of households receiving services aimed to increase housing choice.	0	50

Data source from which the metric data will be compiled

RHA will use its internal software to track units where a PBV has been assigned.

C. Cost Implications

RHA does not anticipate any additional cost implications related to this activity.

D. Need/Justification for MTW Flexibility

Note: All references to authorizations are to the section and paragraph citation of Attachment C of the Standard MTW Agreement.

The following authorizations are required to create a Local Project-Based Voucher Program:

Authorizations Related to Both Public Housing and Section 8 Housing Choice Vouchers

B.4. Transitional/Conditional Housing Program

The Agency may develop and adopt new short-term transitional housing programs, consistent with an eligible use of section 8 and 9 funds, with supportive services in one or more buildings in collaboration with local community-based organizations and government agencies. Successful participants in these programs will be eligible for transfer to the Agency's public housing or housing choice voucher programs.

Authorizations Related to Section 8 Housing Choice Vouchers Only

D.1. Operational Policies and Procedures

The Agency is authorized to determine basic operational policies and procedures for all Section 8 assistance the Agency is provided under section 8(o) of the 1937 Act.



- D.1.b. The Agency is authorized to determine the length of the lease period when vouchers expire and when vouchers will be reissued. This authorization waives certain provisions of Section 8(o)(7)(a), 8(o)(13)(F) and 8(o)(13)(G) of the 1937 Act and 24 C.F.R. §§982.303, 982.309, and 983 Subpart F.
- D.1.e. The Agency is authorized to determine the percentage of housing voucher assistance that it is permitted to project-base, and criteria for expending funds for physical improvements on those units that differs from the percentage and criteria requirements currently mandated in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Section 8 (o)(I3) of the 1937 Act and 24 C.F.R. §983.
- D.2.b. The Agency is authorized to determine contract rents and increases and to determine the content of contract rental agreements that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. *This authorization waives certain provisions of Sections* 8(o)(7) and 8(o)(13) of the 1937 Act and 24 C.F.R. §§982.308, 982.451 and 983 Subpart E.

D.4. Waiting List Policies

The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(6), 8(o)(13)(J), and 8(o)(16) of the 1937 Act and 24 C.F.R. §§982 Subpart E, 982.305 and 983 Subpart F.

- D.5. Ability to Certify Housing Quality Standards

 The Agency is authorized to certify that housing assisted under MTW will meet housing quality standards established or approved by HUD. The certification form will be approved or provided by HUD. This authorization waives certain provisions of Section 8(o)(8) of the 1937 Act and 24 C.F.R. §982, Subpart I.
- D.7. Establishment of an Agency MTW Section 8 Project-Based Program

 The Agency is authorized to develop and adopt a reasonable policy and process for project-basing Section 8 tenant-based leased housing assistance, which includes the components set forth:
 - D.7.a. The Agency is authorized to project-base Section 8 assistance at properties owned directly or indirectly by the Agency that are not public housing, subject to HUD's requirements regarding subsidy layering. If the Agency chooses to project-base Section 8 assistance at such properties, the Agency recognizes and accepts that such units would no longer be eligible for operating subsidy provided under Section 9(e) of the 1937 Housing Act or for future capital funds provided under Section 9(d) for those units if it chooses to use this authorization. Project-based assistance for such owned units does not need to be competitively bid, nor are the owned units subject to any required assessments for voluntary conversion. *This authorization waives certain provisions of Sections* 8(o)(13)(B and D) of the 1937 Act and 24 C.F.R. 982.1, 982.102 and 24 C.F.R. Part 983.



- D.7.b. The Agency is authorized to establish a reasonable competitive process or utilize an existing local competitive process for project-basing leased housing assistance at units that meet existing Housing Quality Standards, or any standards developed by the Agency pursuant to this MTW Agreement and approved by the Secretary, and that are owned by non-profit, or for-profit housing entities. *This authorization waives certain provisions of 24 C.F.R.* §983.51.
- D.7.c. The Agency is authorized to duly adopt, according to the requirements of local law, alternate standards for determining the location of existing, newly constructed or substantially rehabilitated housing to receive subsidy; provided, however, that in lieu of the Site Selection Standards currently set forth in 24 C.F.R. Section 983.57, the Agency will comply with the following requirements:
 - i. The Agency will comply with the Fair Housing Act and Title VI of the Civil Rights Act of 1964, and implementing regulations thereto, in determining the location of newly constructed or acquired public housing units.
 - ii. Units may be located in the agency's jurisdiction, including within, but not limited to, the following types of urban areas: (1) an area of revitalization that has been designated as such by the governing jurisdiction, including Redevelopment Areas and Enhanced Enterprise Communities, (2) an area where public housing units were previously constructed and were demolished, (3) a racially or economically impacted area where the agency plans to preserve existing affordable housing, (4) in connection with HOPE VI or other HUD funded master planned development, (5) in areas where a needs analysis indicates that subsidized housing represents a low percentage of the total number of housing units in the area, or (6) relocating units to an area with a lower concentration of public housing units.
 - iii. Conduct a housing needs analysis indicating that there is a real need for the housing in the area; and
 - iv. When developing or substantially rehabilitating six or more Section 8 project-based units, the agency will: (1) advise current residents of the subject properties and representative community groups in the vicinity of the subject property by letter to resident organizations and by public meeting, of the agency's revitalization plan; and (2) certify to HUD in its Annual MTW Report that the comments from Residents and representative community groups have been considered in the revitalization plan. Documentation evidencing that the agency has met the stated requirements will be maintained at the housing authority and submitted to HUD in its Annual MTW Report.
- D.7.d. All units that receive project-based Section 8 assistance must meet either (i.) existing HQS standards established by the Secretary or (ii) a local standard for communities receiving project-based Section 8 assistance developed by the Agency and approved by the Secretary. This authorization waives certain provisions of Section 8(o)(8) of the 1937 Act and 24 C.F.R. §982 Subpart I.





IV. Approved MTW Activities

A. Implemented Activities

The activities discussed in this section have previously been approved by HUD and implemented by RHA. The following tables provide an overview of each of the approved MTW activities including the year it was implemented, the primary statutory objective(s) the activity is intended to impact, and the Authorization(s) cited.

	Approved MTW activities				
Activity #	Activity Name	Fiscal Year Implemented / Amended	Statutory Objective(s)	Authorization(s) Cited	
2014-01	Assign PBVs to RHA owned/controlled units without competitive process	2014	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections D.2.b. and D.7.a.	
2014-02	Mobility Demonstration	2014	Increase housing choice for low-income families <u>and</u> create incentives for families to work, seek work or prepare for work.	Attachment C Sections D.1.b., D.4., D.7.a., and E.	
2014-05	Simplify rent calculations and increase the minimum rent	2014	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.4., C.11, D.2.a., and D.3.b.	
2014-06	Triennial recertifications for elderly/disabled participants on fixed incomes	amended 2015 amended 2017 amended 2018 amended 2023	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.4. and D.1.c.	
2014-08	Partner with local nonprofit to provide special needs housing	2014	Increase housing choice for low-income families and reduce costs <i>and</i> create incentives for families to work, seek work or prepare for work.	Attachment C Sections B.4., D.1.b., and D.7.a.	
2015-01	Elimination of all negative rents and simplification of HCV utility allowances	2015	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.11. and D.2.a.	
2015-02	Allow RHA to inspect its own HCV units	2015	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.9.a. and D.5.	



Activity #	Activity Name	Fiscal Year Implemented / Amended	Statutory Objective(s)	Authorization(s) Cited
2015-03	Eliminate Caps on PBV allocations and allow for assignment of PBVs to 100% of RHA-owned, non-Public Housing properties	2015 amended 2017	Reduce costs and achieve greater cost effectiveness <u>and</u> increase housing choices for low-income families.	Attachment C Sections D.1.e. and D.7.a.
2016-01	Simplification of medical deductions	2016 amended 2018	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.11. and D.2.a.
2016-02	Redefine near-elderly person	2016 amended 2020	Increase housing choices for low-income families.	Attachment C Section C.2.
2016-04	Allow HCV participants to lease units that exceed the 40% rent burden	2016	Increase housing choices for low-income families.	Attachment C Section D.2.a.
2016-05	Eliminate Earned Income Disallowance (EID)	2016	Reduce costs and achieve greater cost effectiveness.	Attachment C Sections C.11. and D.2.a.
2016-06	Disregard earned income of PH household members, age 18-20, who are not the head of household or co-head	2016	Create incentives for families to work, seek work or prepare for work.	Attachment C Section C.11.
2016-07	Implement a \$75 fee for each additional HQS inspection when more than two inspections are required	2016	Reduce costs and achieve greater cost effectiveness.	Attachment C Section D.1.a.
2016-08	Expand Project Based Voucher Program	2016 amended 2019	Increase housing choices for low-income families.	Attachment C Sections D.1.e. and D.4.
2017-01	Increase verified application data for HCV applicants	2017	Reduce costs and achieve greater cost effectiveness <u>and</u> increase housing choices for low-income families.	Attachment C Section D.3.a.
2017-02	Asset threshold to determine eligibility for admission	2017 amended 2019	Increase housing choices for low-income families.	Attachment C Sections C.2., D.3.a., D.3.b., and D.4.
2018-01	Landlord Incentive Program	2018 amended 2020	Increase housing choices for low-income families.	Attachment C Sections D.1.a. and D.1.d.



Activity #	Activity Name	Fiscal Year Implemented / Amended	Statutory Objective(s)	Authorization(s) Cited
2019-01	Redetermination of rent reasonableness as a result of a change in contract rent	2019	Reduce costs and achieve greater cost effectiveness <u>and</u> increase housing choices for low-income families.	Attachment C Section D.2.c.
2019-02	Provide incentives to \$0 HAP households	2019	Create incentives for families to work, seek work or prepare for work.	Attachment C Sections D.1.a, D.1.b, D.1.c and Section E.
2021-01	Affordable Housing Acquisition, Rehabilitation and Preservation	2021	Increase housing choices for low-income families.	Attachment D - Use of MTW Funds and MTW block grant outlined in PIH 2011-45 (HA)
2021-03	Partnership to Assist Homeless Youth	2021	Increase housing choices for low-income families.	Attachment D - Use of MTW Funds and MTW block grant outlined in PIH 2011-45 (HA)
2022-01	Workforce Development Program	2022 amended 2023	Create incentives for families to work, seek work or prepare for work.	Attachment C Section E



2014-01: Assign PBVs to RHA owned/controlled units without a competitive process

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2014.

Description

RHA owns several single-family homes, duplexes and condominiums throughout Reno, Sparks, and Washoe County that were purchased using various funding sources. To expand the housing choice of low-income households, PBVs have been assigned to several of these scattered site units without going through the competitive process. To assist in expediting the PBV approval process, initial contract rents at or below the applicable Low HOME Rents, are set by RHA. RHA sets these rents in lieu of utilizing a state-certified appraiser and a HUD-approved independent agency.

Status/Update

Although the housing market has strengthened and the amount of available inventory has become extremely limited, RHA remains committed to purchasing or developing additional housing if the units will further the agency's mission. New and existing properties will be reviewed to determine whether the use of a PBV is appropriate. RHA will continue to utilize this flexibility should the opportunity present itself.

This activity will remain ongoing in FY 2024 but will be replaced with Activity 2024-02 following HUD approval. It will be closed out with the next annual report.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2014-02: Mobility Demonstration

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2014.

Description

RHA's Mobility Demonstration allows qualified low-income PH families with children to move to neighborhoods where opportunities are more abundant within the surrounding area. To enable these families to move, RHA is assigning PBVs to agency-owned single-family homes, duplexes and condominiums located within low-poverty neighborhoods throughout the City of Reno and the City of Sparks. Based on a pool of eligible households and the family's approved voucher size, PH families with children, who are currently in good standing and who meet the established requirements to participate in the program, are provided with the opportunity to move into one of the identified properties.

Status/Update

To date, 49 PH families with children have moved to properties located in low-poverty census tracts, 19 of whom are still participating in the demonstration. Overall, this activity has been successful with nearly 37% or 18 families having successfully transitioned off housing assistance.



In addition, five families, who are currently paying full contract rent, are expected to become self-sufficient and move off the program in the coming year.

This activity will remain ongoing in FY 2024.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2014-05: Simplify rent calculations and increase the minimum rent

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2014.

Description

RHA is excluding all educational financial aid from income calculations and allowing self-certification of assets under \$10,000. The full amount of student financial assistance paid directly to the student or to the educational institution is excluded from income calculations for HCV participants. RHA's HCV participants can now benefit from being able to attend an institution of higher education without being penalized with an increase in rent due to any financial assistance that they may secure. Furthermore, households with assets less than \$10,000 can submit a self-certification as to the value of the asset. At the time of application, applicants are asked to provide a well-documented baseline asset value. RHA staff will only calculate income on assets if the value of the assets total more than \$10,000.

Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes

In FY 2014, RHA raised the minimum rent from \$50 to \$75 not only to save significant HCV and PH operating subsidy but provide an incentive for participants to seek employment due to the higher participant contribution to rent. As of January 1, 2023, RHA has 212 households within its PH and HCV programs who are paying a minimum rent of \$75, 46% of these households pay a tenant rent of \$0.

In FY 2024, RHA proposes to raise the minimum rent to \$100. This increase will affect 240 households of which 12% will continue to pay a tenant rent of \$0. On average, affected households will experience a rent increase of \$17/month in the HCV program and \$15/month in the PH program.

As no group of residents will be exempt from the minimum rent, individuals who already have hardship exemptions will continue to be granted that exemption. Individuals who request an exemption may be granted one, based on RHA's standard hardship policy for an exception to minimum rent. RHA's current minimum rent hardship policy states:

An exception to the minimum rent can be requested if the family experiences one or more of the following qualifying events:



- a. The household has lost eligibility or is awaiting an eligibility determination for Federal, State or local assistance, including a household with a member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act, and who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.
- b. The household would be evicted as a result of the imposition of the minimum rent requirement.
- c. The income of the household has decreased because of changed circumstances, including loss of employment or death of a household member. "Loss of employment" is defined as being laid off or terminated through no fault of the employee. Loss of employment does not, for the purposes of exemption to minimum rent, include voluntarily quitting employment. "Death in the family", for the purposes of exemption to minimum rent, includes head of household or spouse, or any household member.
- d. Other circumstances as determined by RHA or HUD.

RHA will review all household requests for exception from the minimum rent due to financial hardships.

If RHA determines that the hardship is temporary (defined as a duration of less than 90 consecutive days), a minimum rent will not be imposed for a period of up to ninety days from the date of the household's request. At the end of the temporary suspension period, a minimum rent will be imposed retroactively to the time of suspension. If RHA determines that there is a qualifying long-term financial hardship, RHA must exempt the household from the minimum rent requirements for as long as the hardship continues. The exemption from minimum rent shall apply from the first day of the month following the household's request for exemption.

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2014-08: Partner with local nonprofit to provide special needs housing

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2014.

Description

RHA is providing PBV units to clients of its nonprofit partners including the Domestic Violence Resource Center (formerly CAAW), Casa de Vida, Human Services Agency of Washoe County, Safe Embrace, Northern Nevada HOPES and Northern Nevada Adult Mental Health Services (NNAMHS). These PBVs are for two years and each of the nonprofit partners provides the supportive services.

Status/Update

This activity will remain ongoing in FY 2024 but will be replaced with Activity 2024-02 following HUD approval. It will be closed out with the next annual report.



Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2015-01: Elimination of all negative rents and simplification of HCV utility allowances

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2015.

Description

RHA's PH residents and HCV participants no longer receive negative rents due to utility allowances. Furthermore, RHA simplified the HCV utility allowances for all units by creating a flat utility allowance schedule based on structure type and authorized voucher bedroom size. The new utility allowances are designed to cover the full cost of apartment utilities, but a lesser percentage proportionally for participants who choose single family homes, duplexes, and mobile homes.

Status/Update

Recently, RHA revised its simplified utility allowances to ensure their feasibility with the changing rental market. As the region's rental market remains tight, landlords are now requiring tenants to pay more utilities. To reduce the financial burden that this changing rental market could have on HCV participants, RHA revised its simplified utility allowance schedule to cover the cost of additional utilities. Following are RHA's current utility allowance schedules:

Owner Paid Water/Sewer/Trash Effective for annuals and vouchers issued on or after 10/1/22					
Structure Type 0-BR 1-BR 2-BR 3-BR 4-BR+					
EES*	\$51	\$59	\$72	\$86	\$101
Apartment	\$59	\$67	\$85	\$103	\$121
Townhouse/Semi-Detached/Duplex	\$70	\$80	\$103	\$125	\$147
Detached – Single Family House	\$88	\$102	\$127	\$155	\$182
Mobile	\$88	\$100	\$123	\$146	\$169

^{*}EES – Energy Efficient Systems includes cooking, heating, and all electric.



Tenant Paid Water/Sewer/Trash – (must pay at least 2 to qualify) Effective for annuals and vouchers issued on or after 10/1/22					
Structure Type 0-BR 1-BR 2-BR 3-BR 4-BR+					4-BR+
EES*	\$142	\$152	\$168	\$185	\$205
Apartment	\$152	\$160	\$181	\$203	\$226
Townhouse/Semi-Detached/Duplex	\$163	\$173	\$199	\$225	\$252
Detached – Single Family House	\$190	\$204	\$232	\$264	\$296
Mobile	\$190	\$202	\$228	\$255	\$283

^{*}EES – Energy Efficient Systems includes cooking, heating, and all electric.

This activity will remain ongoing in FY 2024.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2015-02: Allow RHA to inspect its own HCV units

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2015.

Description

RHA owns a significant number of units which, under HUD's established rules, had to previously be inspected by third party contractors. In FY 2015, RHA staff began conducting inspections on all HCV and PBV units, regardless of ownership or property management status, rather than using third party contractors.

Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2015-03: Eliminate caps on PBV allocations and allow for assignment of PBVs to 100% of RHA-owned, non-Public Housing properties

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2015. It was amended in FY 2017 to eliminate the voucher allocation cap.

Description

RHA owns several non-PH complexes and dwelling units that have been utilized in various



housing programs through the assignment of PBVs. To provide additional low-income families housing assistance and increase the agency's rental revenue, the cap on the number of units where a PBV can be assigned within each project was lifted. This has allowed for the assignment of PBVs to up to 100% of these RHA-owned, non-PH units. In FY 2017, the 20% limit on the amount of voucher funding that may be utilized under the PBV program was also eliminated.

Status/Update

This activity will remain ongoing in FY 2024 but will be replaced with Activity 2024-02 following HUD approval. It will be closed out with the next annual report.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2016-01: Simplification of medical deductions

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2016. It was amended in FY 2018 to modify the income tiers further and establish a requirement that all eligible households self-certify actual medical expenses rather than allowing all participants to simply receive the simplified medical deduction regardless of whether the household incurs the expense.

Description

Rather than use third party verifications and require residents to provide receipts showing out of pocket medical expenses, RHA established and implemented a simplified medical deduction schedule based entirely on the household's gross income. Implementation resulted in the process becoming streamlined for RHA staff and the policy becoming easier for PH residents and HCV participants to understand.

Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes

RHA anticipates reviewing and adjusting the standardized medical deduction table frequently to determine its overall viability for program participants. Following a review of the income guidelines provided by the Medicare Assistance Program in relation to the 2022 Medicare premiums and coverage, it was determined that modifications to the medical deduction table would not be necessary this year.



2016-02: Redefine near-elderly person

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2016. It was expanded upon in FY 2020 to include the use of the near-elderly definition within the PBV program and allow PBV sites, which define elderly as 55 years of age and older, to be considered an elderly property.

Description

In FY 2016, RHA implemented a change to the near-elderly definition for the PH program to limit it to persons who are at least 55 years of age but below the age of 62. These newly defined households are treated as "elderly" to allow for their admission from the waiting list to one of RHA's senior PH complexes. This has allowed the number of eligible families referred to these PH units to increase without raising concerns from current residents regarding potential lifestyle conflicts. By redefining near-elderly and allowing these households to be treated as "elderly" for admission to RHA's senior PH complexes, the affordable housing opportunities for these individuals has successfully increased.

Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2016-04: Allow HCV participants to lease units that exceed the 40% rent burden

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2016.

Description

To allow HCV participants to choose housing in accordance with their individual financial circumstances, RHA began allowing HCV participants, at their option, to lease units that exceed the 40% maximum rent burden. However, at the time tenancy is approved and the HAP contract is executed, the maximum initial rent burden cannot exceed 50% of monthly adjusted income. Implementation of this activity allows participants to look for housing that may be more costly than otherwise permitted under HUD regulations, but it also gives participants the option to live in lower poverty neighborhoods with access to better schools and employment opportunities.

Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes



2016-05: Eliminate Earned Income Disallowance (EID)

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2016.

Description

Earned Income Disallowance (EID) allows eligible tenants in the PH and HCV programs to increase their incomes through employment without triggering rent increases. The resulting income increase is fully excluded for 12 months and 50% excluded for an additional 12 months. Under the "Streamlining Administrative Regulations for Public Housing, Housing Choice Voucher, Multifamily Housing, and Community Planning and Development Programs" published on March 8, 2016, the duration for this exclusion of wages was revised from 48 months to 24 months. However, each eligible family member may be in a different exclusion phase or month count, which remains burdensome for PHA staff to track. In FY 2016, RHA eliminated the HUD-mandated EID from the calculation of rent.

Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2016-06: Disregard earned income of PH household members, ages 18-20, who are not the head of household or co-head

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2016.

Description

HUD regulations for PH residents require that earned income of adult children, between the ages of 18 and 20, be factored into the household's rent calculation. In many cases where an adult child works, the head of household has no control over the child's willingness to contribute to the rent. In some cases, this increased rent burden may place the family at risk of being terminated from the program if the head of household is unable to pay their portion of the increased rent.

In FY 2016, RHA began providing these adult children, ages 18-20 who live in PH and are not the head of household or co-head, an incentive to pursue employment and become economically self-sufficient by revising the definition of countable income. This revision excludes all earned income for these young adults when determining rent for the entire household.

Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes



2016-07: Implement a \$75 fee for each additional HQS inspection when more than two inspections are required

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2016.

Description

Currently RHA is required to conduct a re-inspection on units that fail an annual HQS inspection to ensure that the owner/manager has corrected the noted violations. If the unit fails HQS, the owner/manager is notified in writing of the deficiencies and repairs that need to be made within 30 days. If the owner/manager does not take the required corrective action within the specified time, RHA can abate the HAP beginning 30 days from the date of the first inspection until the required work is totally complete. Frequently, a third inspection is required to verify the completion of the noted deficiencies.

To encourage owners/managers to correct the noted violations quickly and provide RHA's HCV participants with safer living conditions, RHA began to assess a \$75 fee for each additional HQS inspection. This fee commences when more than two HQS inspections are required due to the owner/manager's failure to complete the necessary repairs. The fee for the inspection does not remove the abatement of the subsidy, but rather seeks to cover the administrative costs of conducting a third inspection that would not have been required had the owner/manager corrected the noted violations in a timely manner and incentive landlords to make timely repairs. The owner/manager cannot pass this fee on to the tenant.

Owners/managers frequently request extensions to complete the necessary repairs prior to the third inspection, and RHA anticipates that this will continue. However, upon implementation of this activity, extensions are no longer granted for more than 30 days following the date of the second inspection except under certain circumstances which are approved by RHA.

Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2016-08: Expand Project Based Voucher Program

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2016. It was expanded upon in FY 2019 to include families who are participating in Washoe County's workforce development programs.

Description

RHA allocates PBVs to RHA-owned units which are utilized in several of RHA's housing programs and to assist RHA's local nonprofit partners in housing high risk families who have immediate housing needs. On May 11, 2016, RHA received approval to amend its FY 2016 MTW Annual Plan to allow for the expansion of its PBV program.



This expansion allows for the allocation of up to 50 PBVs to privately owned properties in exchange for the owner's commitment to provide affordable housing to individuals and/or families who are experiencing homelessness. This activity was amended in FY 2019 to expand RHA's PBV program to address the lack of affordable housing options for families who are actively participating in workforce development programs within Washoe County.

To implement the activity effectively, RHA also received approval to remove the 25% per building cap established in 24 CFR §983.56 for all PBVs assigned under this activity.

Status/Update

This activity will remain ongoing in FY 2024 but will be replaced with Activity 2024-02 following HUD approval. It will be closed out with the next annual report.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2017-01: Increase verified application data for HCV applicants

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2017.

Description

RHA's Admin Plan and federal regulations require that information submitted by each applicant be verified by staff to ensure that the data provided by the applicant that was used to determine eligibility, priority status, HAP to be paid and voucher size is true and complete. Per CFR §982.201(e), RHA must receive information verifying that an applicant is eligible for the HCV program within the period of 60 days prior to the issuance of a voucher to the applicant. Information not subject to change (i.e., date and place of birth) does not need to be re-verified. Information that is subject to change, which was verified more than 60 days prior, must be reverified close to certification of the applicant's file. If there is a delay after the file has been certified and referred to the HCV program that will cause an applicant to not lease up, the voucher is suspended while the information is re-verified. If changes are reported late, the file will be returned to Admissions staff to obtain written verification and to determine their effect on eligibility, rent and unit size.

The amount of time RHA staff spent following-up and tracking third-party verification requests was significant and often resulted in information that was no more reliable than the documents provided by the applicants directly. To streamline the admissions process, reduce the amount of time required by staff, and decrease the time necessary to build a qualified applicant pool, RHA received approval to extend the length of time that all verified application data related to income is deemed valid for the HCV program to 120 days. Furthermore, this activity also allows stable income verifications, such as pensions and Social Security award letters, to be valid for the current year.

Status/Update

This activity will remain ongoing in FY 2024.



Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2017-02: Asset threshold to determine eligibility for admission

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2017. It was amended in FY 2019 to exclude cash assets of elderly/disabled applicants.

Description

Under 24 CFR §5.609, annual income is defined to include amounts derived (during the 12-month period) from assets to which any member of the family has access. Income resulting from any assets held by the family must be calculated and included when determining program eligibility and rent portions. However, under HUD's current guidelines, there is no limit on the amount of assets a family may have access to prior to determination of eligibility.

To serve applicants who are most in financial need, RHA received approval to establish an asset threshold when determining eligibility for admission to its housing programs. Should an applicant have combined assets with a cash value of more than \$50,000, or ownership in a suitable dwelling unit which they have a legal right to reside in, they are determined to be ineligible for admission.

In FY 2019, RHA amended this activity to exclude cash assets only when determining eligibility for elderly/disabled HCV and PH households. Ownership in a property that the applicant has a legal right to reside in remains in place for all applicants when determining eligibility for RHA's housing programs.

Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2018-01: Landlord Incentive Program

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2018. It was amended in FY 2020 to expand upon the conditions for qualification.

Description

Based on information received from landlords through a survey which noted barriers to their continued participation in the HCV program, RHA implemented a Landlord Incentive Program in FY 2018 that was expanded upon in FY 2020. The program allows landlords to receive their contracted HAP payment through the end of the month for units occupied by HCV participants vacating under the following conditions: (1) deceased tenant, (2) eviction, (3) skip, (4) a family responsibility violation, or (5) excessive damage to the unit that is beyond normal wear and tear.



Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes

In FY 2024, RHA will begin to provide the actual HAP amount through the end of the month as well as one additional month of full contract rent to landlords automatically regardless of the actual move-out date of the participant. Landlords can utilize the additional month of contracted rent toward damages incurred within the unit or as compensation for a vacancy loss.

To ensure landlords can maintain equal housing opportunities and follow their existing procedures, RHA does not require landlords to rent to another voucher holder to qualify for the Landlord Incentive Program. However, in FY 2024 RHA will utilize single fund flexibility to expand the Landlord Incentive Program and provide landlords with a \$500 re-lease bonus and a \$1,000 referral bonus. Based on this expansion, current HCV landlords who sign a HAP contract to lease the same unit to another HCV program participant, will automatically receive a \$500 re-lease bonus. In addition, current landlords who refer a new landlord to the HCV program will be eligible for an automatic referral bonus. To qualify for the referral bonus, the new landlord must be one who has never leased to one of RHA's HCV program participants before.

To engage and retain current and future HCV landlords, RHA began reviewing various software companies who specialize in landlord relationships. In the coming year, RHA may use single fund flexibility to purchase software that will centralize landlord relationships, reduce housing search times, and expand housing opportunities.

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2019-01: Redetermination of rent reasonableness as a result of a change in contract rent

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2019.

Description

The strengthening housing market and the lack of affordable housing in the City of Reno, the City of Sparks and Washoe County has resulted in private landlords becoming wary or simply refusing to rent to HCV participants. This is oftentimes made worse by the myriad of regulations that must be adhered to when leasing to a family participating in the HCV program. These burdensome regulations include mandatory inspections and the requirement to determine whether a CRI request is reasonable. Several of RHA's landlords expressed dissatisfaction in having to complete a rent reasonableness determination when requesting a rent increase and many disagree with the comps used if the amount requested is determined to be unreasonable. In fact, some landlords have openly expressed that they can easily rent the unit to a family who is not receiving assistance at whatever price they deem appropriate.

Based on the local rental market, RHA began waiving the requirement for a rent reasonableness determination in FY 2019 if the new requested rent amount represents a change of 10% or less.



This policy change is anticipated to assist in retaining landlords who continue to lease to HCV participants in this challenging rental market and alleviate the amount of time required of staff to process requests.

Status/Update

During FY 2022, RHA processed 1,202 rent change requests of which 909 or 76% sought a change of 10% or less. Rent reasonableness determinations are still made by RHA staff on a regular basis. Staff continue to complete a rent reasonableness determination when a unit is placed under a HAP contract for the first time, when an owner requests a contract rent change of more than 10%, or at any other time RHA deems necessary.

RHA conducted a general analysis of the local rental market to ensure this policy change continues to be a viable option for waiving the required rent reasonableness determination following a CRI request of 10% or less. According to Zillow, the median rent price in Reno for December 2022 is \$2,000. This is \$100 more than December 2021. With current rental market conditions in mind, RHA plans to continue to alleviate some of the administrative burden required of RHA staff while at the same time continuing to provide an incentive to RHA's HCV landlords by leaving this threshold at 10% for the coming year.

This activity will remain ongoing in FY 2024.

Planned Changes

In FY 2024, RHA proposes to allow for automatic approval of a CRI without a rent reasonableness redetermination if the requested rent change amount does not exceed RHA's payment standards.

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2019-02: Provide incentives to \$0 HAP households

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2019.

Description

Many of RHA's families who increase their household earnings and begin to pay full contract rent also experience the "benefits cliff." For many of these families, an increase in earned income results in a loss of eligibility for certain public benefits such as Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), childcare subsidy and housing. As a result, it is not uncommon for households approaching the end of the six-month period of zero assistance to elect to reduce their income or lose employment in order to keep their housing assistance as many remain fearful of no longer having the safety net offered through assistance eligibility.

To ease this fear and increase the success rate of RHA's HCV households in becoming economically self-sufficient, RHA adopted a new policy in FY 2019 that extends the length of time a household can remain on the HCV program while receiving zero assistance. By lengthening the period from six months to 12 months, RHA expects to provide an additional level of security



and confidence. Participants can continue to increase their earned income while at the same time eliminating the incentive to terminate employment or reduce working hours.

As an additional incentive to HCV participants on their way to self-sufficiency, RHA began allowing households at \$0 HAP to accrue an escrow account for up to 12 months. Using single-fund flexibility, RHA began setting aside 15% of each household's contracted rent monthly in an escrow account for no more than 12 months while the household remains on the program receiving zero assistance. This escrow accrual begins the first month that the family reaches \$0 HAP, accumulate monthly for up to 12 months and will be provided to the family once the HAP contract is terminated by RHA and the family has successfully transitioned off the HCV program. If, at any time during the 12-month accrual period, the family becomes eligible to receive housing assistance again, the amount of money accrued is forfeited and the escrow accrual starts over from zero if/when the household reaches \$0 HAP again. Should the family choose to move off the HCV program within the 12-month period that they are receiving zero assistance, they move off the program with the amount accrued in the account up to the date of their voluntary departure.

This policy change is intended to encourage increased earnings and upward mobility by providing a small amount of additional assistance for RHA's families as they approach the benefits cliff. As a result, it is not RHA's intent to put restrictions on what the escrow amount can be spent on. However, each escrow accrual during this \$0 HAP period is subject to funding availability and payouts will be limited to one per lifetime for all adults within the household at the time the escrow accrual is paid to the family. Households who accept the escrow accrual payment and transition off housing assistance will only be allowed to reapply following a three-year period without housing assistance. Furthermore, families who are participating in RHA's traditional FSS program and escrowing as part of their participation, will only be allowed to receive one escrow.

Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2021-01: Affordable Housing Acquisition, Rehabilitation and Preservation

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2021.

Description

Rents in the Truckee Meadows remain unstable leaving many families struggling to pay rent as housing affordability continues to be an issue. In FY 2021, RHA began exploring ways that single fund flexibility through the MTW Demonstration could be used to assist in the acquisition/development of new affordable units, the rehabilitation of newly acquired properties, and the preservation and revitalization of existing affordable housing properties.



Status/Update

RHA has plans to utilize this activity for the development of affordable housing units in Washoe County. Use of MTW funding flexibility related to development will be committed through a Resolution adopted by RHA's Board of Commissioners.

This activity will remain ongoing in FY 2024.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2021-03: Partnership to Assist Homeless Youth

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2021.

Description

In FY 2021, RHA partnered with Eddy House, a local 501(c)3 non-profit, that serves as the central intake and assessment facility in northern Nevada for homeless youth, ages 12-24. Recently the local non-profit purchased a building that now serves as a resource center during the day and an overnight facility. RHA assists Eddy House with their 24-hour facility by funding up to 43 beds.

Status/Update

This activity will remain ongoing in FY 2024.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

2022-01: Workforce Development Program

Plan Year Approved, Implemented, and Amended (if applicable)

This activity was approved and implemented in FY 2022. It was amended in FY 2023 to allow for any adult member of the household to sign a contract to participate.

Description

Past successes and failures led staff to revise the agency's definition of self-sufficiency in FY 2017 and restructure the FSS program into a Workforce Development Program in FY 2019. Through this restructuring, RHA began to provide a more client focused approach to self-sufficiency.

Increasing the number of PH residents and HCV participants moving toward the final phase of self-sufficiency by directly providing or connecting them to available educational opportunities and job trainings that promote economic independence continues to be a main pillar of RHA's Workforce Development Program. Addressing the need for sustainable employment that encourages economic mobility across multiple generations should be an integral part of the program's design. To achieve this, RHA's Workforce Development Program began addressing the needs of the entire family - from one individual member, to parents, and youth.



Status/Update

By January 1, 2023, 62 participants have signed Contracts of Participation and are actively involved in RHA's WFD program. In addition, there are 16 on a waitlist until HUD approves RHA's new FSS Action Plan as required under the new FSS rule. The WFD program is designed for motivated participants who are ready to create a concise plan to reach self-sufficiency. As such, each active participant must be interested and have the motivation to work with their Workforce Development Coordinator to:

- Set and attain goals
- Increase employment skills and/or enroll in higher education classes
- Attend Workforce Development in-house workshops that focus on soft and hard employment skills
- Conduct job searches and/or attend career fairs
- Maintain employment

To assist motivated WFD participants working toward the goals identified in their Individual Training and Services Plans (ITSPs), RHA utilized single fund flexibility to implement several financial incentives. This includes providing rent credits based on goal completion and financial assistance with some of the most common barriers to self-sufficiency through the establishment of a Self-Sufficiency Fund.

Implementation of this activity also serves as an investment in RHA's youth. RHA's Youth Workforce Development Program, or Start Smart, has been designed to assist PH and HCV youth in establishing short and long-term educational and career goals. Benefits of program participation are highlighted with each eligible family and include one-on-one mentoring with RHA staff, financial credits for workshop participation, job search support, and assistance with financial aid and scholarship searches.

As of January 1, 2023, RHA has 24 youth who are actively participating in Start Smart and building their financial incentive credits. Earned credits will be paid directly to the participating youth upon graduation from the Start Smart program. Furthermore, each graduate will also be given the opportunity to apply for one of three one-time scholarships, \$10,000 each, to be used toward post-secondary plans identified through participation in the program.

In the coming months, RHA anticipates using single fund flexibility to assist this department on an as needed basis. This may include providing necessary funding to rehab a new office space which was recently donated to RHA's Workforce Development Program by CIRE Equity. Recruiting/employing additional Workforce Development staff, providing workshops/training for staff, clients and youth who are actively participating in RHA's Workforce Development Program, and covering some expense incurred by partnering agencies who are committed to providing additional support to program participants are also activities that may require the use of single fund flexibilities.

This activity will remain ongoing in FY 2024.

Planned Changes



B. Not yet implemented activities

The activities discussed in this section have previously been approved by HUD, but not yet implemented by RHA. The following table provides an overview of each of the approved MTW activities that have not yet been implemented including the year it was identified, the primary statutory objective(s) the activity is intended to impact, and the Authorization(s) cited.

	MTW activities approved but not yet implemented						
Activity #	Plan Year Approved	Activity Name	Statutory Objective(s)	Authorization(s)			
2021-02	2021	STAR Apprenticeship Program	Create incentives for families to work, seek work or prepare for work.	Attachment C Section C.11 and Section D.2.a.			

2021-02: STAR Apprenticeship Program

Description

As Washoe County's workforce and employers evolve, training and preparation programs are becoming necessary to secure several of the higher paying jobs that are available within the region. In FY 2021, RHA proposed using single fund flexibility to establish the STAR Apprenticeship Program. This 24-week program will be designed to provide career-connected learning opportunities for residents of all ages. Through the program, PH residents and HCV participants will be provided with on-the-job training and related classroom instruction that will serve to increase current skill levels. More importantly, each STAR participant will gain valuable work experience within one of RHA's departments (maintenance, development, finance, etc.) and be provided with continuous feedback regarding expectations and overall performance throughout.

Update/timeline for implementation

Although this activity was scheduled to begin in January 2021, it is now unclear when this activity will be implemented.

Planned Changes

RHA does not anticipate any non-significant or significant changes to this activity. There are also no changes or modifications to the metrics/data collection anticipated during the plan year.

C. Activities on hold

Not applicable. RHA does not have any activities on hold.



D. Closed Activities

The activities discussed in this section have previously been approved by HUD but closed by RHA. The following table provides an overview of each of the approved MTW activities that have been closed by RHA including the year it was identified and implemented, the primary statutory objective(s) the activity was intended to impact, and the Authorization(s) cited.

	Closed MTW activities				
Activity #	FY Implemented	FY Closed	Activity Name	Statutory Objective(s)	Authorization(s)
2014-03	2014	2019	Rent Reform Controlled Study	Create incentives for families to work, seek work or prepare for work <u>and</u> reduce costs and achieve greater cost effectiveness.	Attachment C Sections D.1.b., D.1.c., D.2.a., and D.4.
2014-04	2014	2021	Expand self-sufficiency activities	Create incentives for families to work, seek work or prepare for work.	Attachment C Section E.
2014-07	2014	2017	Alternate HQS verification policy	Reduce costs and achieve greater cost effectiveness.	Attachment C Section D.5.
2015-04	2015	2018	Required Savings Plan for Earned Income Disallowance (EID) PH clients	Create incentives for families to work, seek work or prepare for work.	Attachment C Section E.
2016-03	N/A	2020	Time limited vouchers and redesign of traditional FSS Program	Create incentives for families to work, seek work or prepare for work <u>and</u> reduce costs and achieve greater cost effectiveness <u>and</u> increase housing choices for lowincome families.	Attachment C Section D.1.b., Section D.1.c., Section D.2.d., and Section E. Attachment D Use of MTW Funds

2014-03: Rent Reform Controlled Study

Plan Year Approved, Implemented, and Closed Out

This activity was approved and implemented in FY 2014. It was closed out in FY 2019.

Reason for close out

RHA staff considered several factors before reaching a decision to close this activity. Based on current rental market conditions resulting in a decline in RHA's current HCV lease up figures along with the undue stress that a time-limited voucher may cause for the participating family, this activity was closed. Notification was given to all remaining Rent Reform Controlled Study participants of RHA's intent to close the activity at which time all active households were transitioned to a regular HCV voucher. This activity was closed in FY 2019 and is no longer being reported on.



2014-04: Expand self-sufficiency activities

Plan Year Approved, Implemented, and Closed Out

This activity was approved and implemented in FY 2014. It was closed out in FY 2021.

Reason for close out

RHA recently restructured its entire FSS Program into a Workforce Development Program focused on Job placement and job retention for all able-bodied participants in RHA's housing programs, including youth. As the goal of this activity is to propel households toward the final phase of self-sufficiency, RHA will no longer refer households with delinquent community service hours to the Workforce Development Program. This fundamental change resulted in this activity, including the FSS Lite Program, being closed and replaced with 2022-01: Workforce Development Program.

2014-07: Alternate HQS verification policy

Plan Year Approved, Implemented, and Closed Out

This activity was approved and implemented in FY 2014. It was closed out in FY 2017.

Reason for close out

As HUD is now allowing for Biennial HQS Inspections through Section 220 of the 2014 Appropriations Act, this activity was closed out in FY 2017 and is no longer being reported on.

2015-04: Required Savings Plan for Earned Income Disallowance (EID) PH clients

Plan Year Approved, Implemented, and Closed Out

This activity was approved and implemented in FY 2015. It was closed out in FY 2018.

Reason for close out

RHA received approval through Activity 2016-05 to eliminate the HUD-mandated EID from the calculation of rent. To alleviate the impact that this would have on rent calculations for some PH residents and HCV participants, EID participants could keep their benefits for one year following plan approval. After this initial year, all participants will have their EID benefits eliminated upon their first annual recertification or immediately following the termination of employment income. All participants have been phased off EID. This activity was closed in FY 2018 and is no longer being reported on.

2016-03: Time limited vouchers and redesign of traditional FSS Program

Plan Year Approved, Implemented, and Closed Out

This activity was approved in FY 2016 but never implemented. It was closed out in FY 2020.

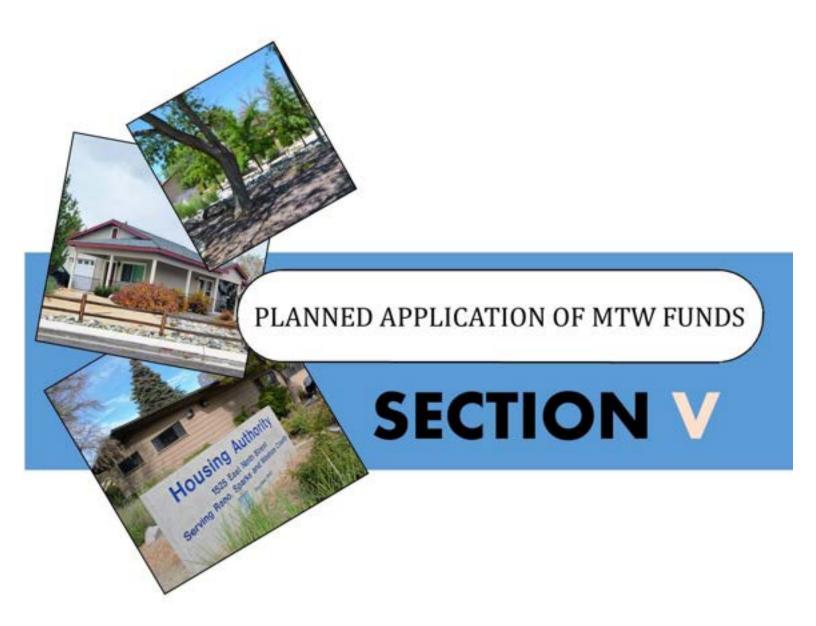
Reason for close out

In FY 2014, RHA began issuing vouchers limited to five years as part of a Rent Reform Controlled Study (Activity 2014-03) within the HCV program. RHA partnered with an outside institution to evaluate the continuing effects and changing statuses of families participating in the Rent Reform Controlled Study. The purpose of the evaluation was to properly gauge whether increases in



income that do not affect a household's rent and whether limiting vouchers to five years was incentive enough for families to become self-sufficient. As RHA worked through the lessons learned from the Rent Reform Controlled Study and current rental market conditions, staff determined that implementation of this activity on all non-elderly/non-disabled HCV participants would result in undue stress on participating families. This activity was closed in FY 2020.







V. Planned Application of MTW Funds

This section includes summary budget information for FY 2024 including planned sources and uses for MTW funds.

A. Planned Application of MTW Funds

i. Estimated Sources of MTW Funds

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item. Following is RHA's estimated sources and amount of MTW funding by FDS line item:

ESTIMATED SOURCES OF MTW FUNDS				
FDS Line-Item Number		FDS Line-Item Name	Dollar Amount	
70500 (70300+70400)		Total Tenant Revenue	\$3,113,896	
70600		HUD PHA Operating Grants	\$23,437,858	
70610		Capital Grants	\$1,495,961	
70700 (70710+70720+70730+70740+70750)		Total Fee Revenue	\$0	
71100+72000		Interest Income	\$363	
71600		Gain or Loss on Sale of Capital Assets	\$0	
71200+71300+71310+71400+71500		Other Income	\$288,390	
	70000	Total Revenue	\$28,336,468	

ii. Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the plan year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year are identified here; unspent funds that the MTW PHA is not planning during the plan year are not included in this section. Following is RHA's estimated application of MTW funds by FDS line item:

ESTIMATED APPLICAT	ESTIMATED APPLICATION OF MTW FUNDS				
FDS Line-Item Number	FDS Line-Item Name	Dollar Amount			
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$3,050,751			
91300+91310+92000	Management Fee Expense	\$1,606,597			
91810	Allocated Overhead	\$0			
92500 (92100+92200+92300+92400)	Total Tenant Services	\$339,479			
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$644,883			



93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$2,211,691
95000 (95100+95200+95300+95500)	Total Protective Services	\$0
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$248,136
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$577,747
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$18,787,722
97400	Depreciation Expense	\$1,527,467
97500+97600+97700+97800	All Other Expense	\$0
90000	Total Expenses	\$28,994,473

Description of Variance between Estimated Total Revenue and Estimated Total Expenses:

RHA populates the amounts in the preceding table directly from our most recent FDS submission whether unaudited or audited. RHA has not experienced a change in the number of PH units. RHA has continued to experience a change in HAP expense due to an increase in payment standards. The increased payment standards mean higher HAP payments for clients which is driven by an extremely tight rental market in Washoe County. In FY 2024, RHA intends to increase current HCV lease-up to meet each of the MTW Statutory Requirements.

iii. Description of Planned Application of MTW Funding Flexibility

The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).



PLANNED APPLICATION OF MTW FUNDING FLEXIBILITY

In FY 2024, RHA plans to submit an application to begin to reposition its PH properties through Section 18 Demolition/Disposition, RAD PBV or a RAD PBV/Section 18 Blend. Through this repositioning, RHA plans to utilize MTW single fund flexibility to augment RAD rents, provide relocation services to affected residents, and increase replacement reserves at each property converted. In addition, funding flexibility will be used to establish ongoing tenant participation funds for continued Resident Council involvement at sites repositioned through Section 18 Demolition/Disposition.

RHA's Board of Commissioners have identified the expansion of resident services programs as a priority goal for the agency in the coming year. Beyond the Workforce Development Program, RHA will use MTW single fund flexibility to provide additional services to the people we serve and expand upon the services offered to all residents through this department. These expanded services will include offerings to RHA's senior/disabled residents, and the activities/programs made available to RHA's youth.

RHA will continue to use single fund flexibility to pay administrative and operating costs that are not covered by the administrative fee in the HCV program or operating subsidy within the PH program. RHA will report these expenses in VMS utilizing the MTW Other field at the end of each calendar year.

RHA does not anticipate any additional uses of MTW single fund flexibility other than those found in Section (III) or Section (IV) of the Annual MTW Plan.

iv. Planned Application of PHA Unspent Operating Fund and HCV Funding

The MTW PHA shall provide a description of planned activities and/or use(s) for unexpended Operating Fund and HCV Funding. The original funding source is defined as the legacy MTW PHA's appropriated Section 8 and Section 9 funding source(s) (HCV HAP, HCV Admin Fee, and PH Operating Subsidy). Where possible, please identify the planned use, the estimated amount, to which funding source the planned use(s) is attributable, as well as the projected timeline or timeline update.

Original Funding Source	Beginning of FY – Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$19,274,810	\$11,073,563
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$0	\$0
TOTAL	\$19,274,810	\$11,073,563

- * Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.
- ** HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.



v.

Description

In FY 2024, RHA plans to develop two properties utilizing the flexibility allowed under Activity 2021-01. The first project is the redevelopment of agency owned property and the second is a new development of land acquired using State of Nevada American Rescue Plan funds. Both projects are anticipated to start mid to late 2023.

The redevelopment project, Carville Court Redevelopment, will consist of the demolition of an existing six-unit complex (three duplexes) that was purchased by RHA using unrestricted funds in the late 1990's. RHA plans to redevelop the site to include up to 12 new supportive housing units for individuals experiencing homelessness or who are at risk of homelessness. RHA plans to partner with a local community service agency who is currently providing a six-month transitional housing program. Their program is aimed at stabilizing homeless individuals by building life skills and providing medical and mental health stabilization. RHA's preliminary budget for this redevelopment project is \$4.8 million.

The second project is a new development of 15-units on land acquired utilizing funds awarded to RHA by the State of Nevada. RHA anticipates serving households at this complex whose income is at or below 60% of the Area Median Income (AMI). The preliminary budget for this development project is \$6.27 million.

I	Local Asset Management Plan
a.	Is the MTW PHA allocating costs within statute? YES/No
b.	Is the MTW PHA implementing a local asset management plan (LAMP)? Yes/NO
c.	Has the MTW PHA provided a LAMP in the appendix? Yes/NO
d.	If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.
	N/A

vi. Rental Assistance Demonstration (RAD) Participation

a. Description of RAD Participation
The MTW PHA shall provide a brief description of its participation in RAD. This
description must include the proposed and/or planned number of units to be converted
under RAD, under which component the conversion(s) will occur, and approximate
timing of major milestones. The MTW PHA should also give the planned/actual
submission dates of all RAD Significant Amendments. Dates of any approved RAD
Significant Amendments should also be provided.



Rental Assistance Demonstration (RAD) Participation

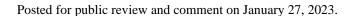
RHA is not currently participating in the RAD program but has included a RAD Amendment to this plan as the agency prepares to apply to reposition its PH sites in the coming year.

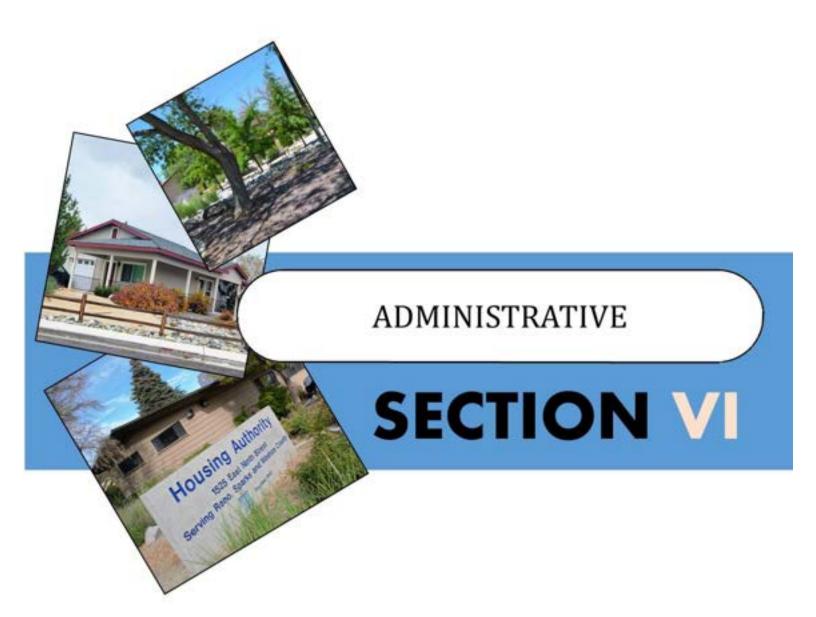
b. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.



c. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

This is the first RAD Significant Amendment submitted by RHA.







VI. Administrative

A. Board Resolution and Certifications of Compliance

Board Resolution 2023-03-XX RH approving the content and submission of the FY 2024 MTW Annual Plan and the Certifications of Compliance (see Attachment I).

B. Documentation of Public Process

- The FY 2024 MTW Annual Plan was discussed at multiple Resident Advisory Board and Resident Council meetings beginning in January 2023. The plan continued to be discussed at meetings of the Resident Councils through March 2023. Resident sign in sheets from each of the above-mentioned meetings are available upon request.
- The FY 2024 MTW Annual Plan is being made available for public review and comment on RHA's website and at RHA's Administrative Office beginning January 27, 2023 through March 28, 2023.
- Proof of Publication Notice (see Attachment II). The FY 2024 MTW Annual Plan was advertised in the Legal Notices section of the Reno Gazette-Journal as follows:

NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD

The Housing Authority of the City of Reno (RHA) is requesting public comments and conducting a public hearing on the proposed MTW Annual Plan for Fiscal Year (FY) 2024 that includes a Rental Assistance Demonstration Program and Section 18 Repositioning Amendment.

RHA's FY 2024 MTW Annual Plan for the period July 1, 2023 - June 30, 2024, is available for public review and comment beginning January 27, 2023 through March 28, 2023, at RHA's Administrative Office, 1525 E. Ninth St, Reno, NV 89512 or on RHA's website at www.renoha.org. Copies of the FY 2024 MTW Annual Plan may also be obtained by contacting Kim Anhalt, MTW Coordinator at (775) 329-3630; TDD (385) 770-7166 or by email at kanhalt@renoha.org.

The public may provide oral comments by attending the public hearing described below and/or submitting written comments during the comment period. Written comments on RHA's draft FY 2024 MTW Annual Plan can be mailed to the address noted above and must be received by close of business on Monday, March 27, 2023.

A public hearing to answer questions and receive comments will be held at 6:00 PM on Thursday, March 2, 2023, in Silverada Manor's Community Room, 1400 Silverada Blvd., Reno, NV 89512.

• A public hearing for the FY 2024 MTW Annual Plan was held at 6:00pm on Thursday, March 2, 2023. It was attended only by staff.



C. Planned and Ongoing Evaluations

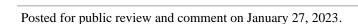
(see Attachment III)

D. Rental Assistance Demonstration Program and Section 18 Repositioning

Plan Amendment covering all required elements for participation in the Rental Assistance Demonstration Program and Section 18 Repositioning (see Attachment IV).

E. Lobbying Disclosures

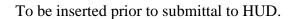
Certification of Payments to Influence Federal Transactions and Disclosure of Lobbying Activities (see Attachment V).

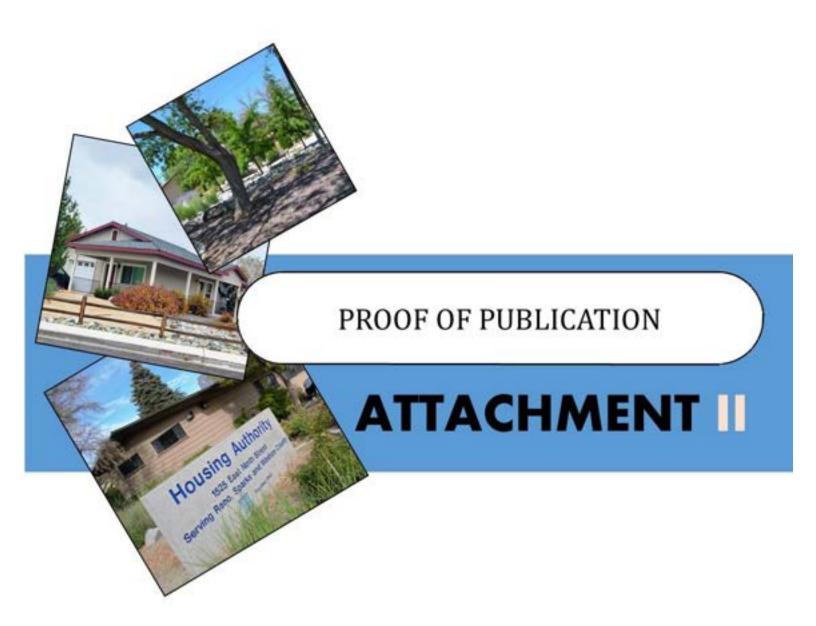






Attachment I: Board Resolution and Certifications of Compliance

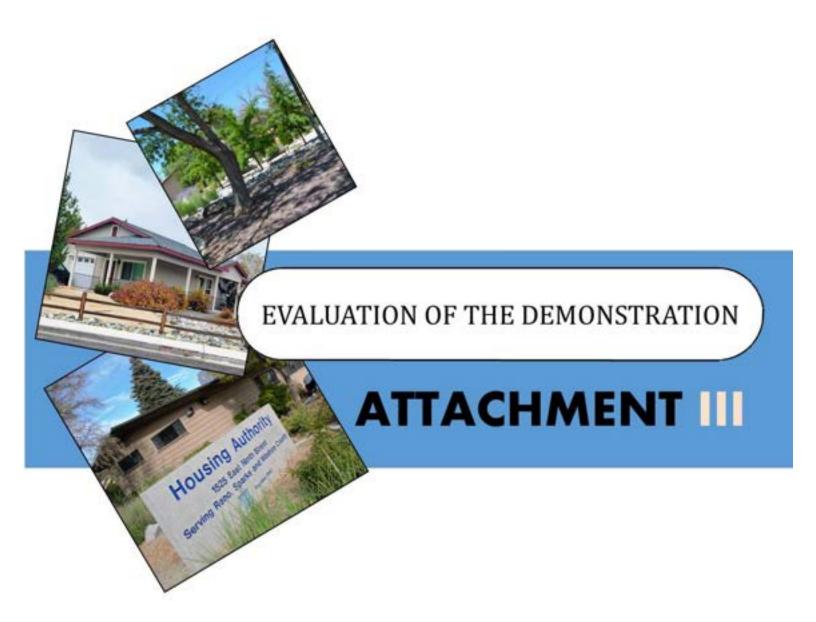






Attachment II: Proof of Publication

To be inserted prior to submittal to HUD.





Attachment III: Evaluation of the Demonstration

Mobility Demonstration Study Analyses and Results as of August 30, 2022

The Mobility Demonstration began in 2014 and allows households in public housing to move to PBV single-family, duplex, or multifamily units in low-poverty neighborhoods. The purpose of this study is to determine if a move out of public housing to a low-poverty neighborhood improves outcomes for households with children. RHA has partnered with Dr. Rebecca J. Walter at the University of Washington to analyze the data and outcomes for the Mobility Demonstration Study.

A within-subject design is used to compare household outcomes over time using administrative and American Community Survey (ACS) data (Table 1). Many of the households moved in public housing before the Mobility Demonstration Study was initiated and were enrolled in the study when they moved from public housing to a PBV unit. The household characteristics, household outcomes, and neighborhood characteristics assessed in this study are included in Table 1. The Wilcoxon Rank Sum Test was used instead of the Paired Samples T-Test since the data violates the assumption of normality, there are outliers in the data, and the sample size is small. The 2016 ACS 5-year Estimates were used for the neighborhood characteristics since most participants moved from public housing to a PBV unit in 2014. In 2022, a new survey was administered to capture additional household outcomes. The survey gathers information about physical and mental health, safety, finances and wealth accumulation, employment and education, child well-being, and neighborhood and housing preferences. Twenty households have participated in the survey to-date. Descriptive statistics are provided for the responses since this is the first year that the new survey was conducted.

Table 1. Variables

	Data Source	Data Type	Statistical Test
Household Characteristics		>	
Gender	Administrative	Categorical	Descriptive Statistics
Race	Administrative	Categorical	Descriptive Statistics
Ethnicity	Administrative	Categorical	Descriptive Statistics
Years in Public Housing	Administrative	Discrete	Descriptive Statistics
Head of Household Age	Administrative	Discrete	Descriptive Statistics
Household Size	Administrative	Discrete	Descriptive Statistics
Number of Adults in Household	Administrative	Discrete	Descriptive Statistics
Number of Children in Household	Administrative	Discrete	Descriptive Statistics
Household Outcome Variables			
Employment Status	Administrative	Categorical	McNemar
Annual Household Income	Administrative	Continuous	Wilcoxon
Physical and Mental Health	Survey	Discrete	Descriptive Statistics
Safety	Survey	Likert Scale	Descriptive Statistics
Financial Security/Wealth Accumulation	Survey	Likert Scale	Descriptive Statistics
Employment and Education	Survey	Likert Scale	Descriptive Statistics
Child Well-being	Survey	Likert Scale	Descriptive Statistics
Housing and Neighborhood Preferences	Survey	Rank Order	Descriptive Statistics



Neighborhood Characteristics			
Percent high school graduate or higher	ACS	Continuous	Wilcoxon
Percent bachelor's degree or higher	ACS	Continuous	Wilcoxon
Unemployment rate	ACS	Continuous	Wilcoxon
Median household income	ACS	Continuous	Wilcoxon
Percent of people in poverty	ACS	Continuous	Wilcoxon
Proportion of vacant housing units	ACS	Continuous	Wilcoxon
Proportion of single-family homes	ACS	Continuous	Wilcoxon
Owner occupancy rate	ACS	Continuous	Wilcoxon
Median home value	ACS	Continuous	Wilcoxon
Median gross rent	ACS	Continuous	Wilcoxon
Percent White	ACS	Continuous	Wilcoxon
Percent Hispanic or Latino	ACS	Continuous	Wilcoxon

Only households that participated in the study for at least one year are included in the study so within-subject analyses over time can be conducted. This resulted in 48 households being included in the analyses. Households entered and exited the study at different times. There are 21 households that are currently enrolled in the study and 27 households that have exited the study (Table 2).

Table 2. Sample Size and Number of Years of Participation in the Study

Participant Year	Count	Currently Enrolled	Exits
Year 1	48	2	8
Year 2	38	2	7
Year 3	29	2	4
Year 4	23	3	4
Year 5	16	2	2
Year 6	12	0	0
Year 7	12	4	1
Year 8	7	6	1
Total		21	27

Of the 27 exits, over half of the exits from the mobility program have been voluntary self-sufficiency exits (Table 3). Within the second year after the move from public housing, some households voluntarily exited the program and were able to pay their rent in full on their own, while on the other hand, it took other households over six years to reach this point. The sample size is too small to generalize an approximate period for how long the average non-elderly and/or non-disabled household needs housing assistance before they can afford housing without a subsidy.

Table 3. Reasons for Exiting the Program

Reason	Count	Percent
Deceased	1	4%
Program/Lease Violation	3	11%
Transferred to VOO	6	22%
Voluntarily Left Program	3	11%
Paying Full Rent/Purchased Home	14	52%
Total	27	100%



Many households in the study are White, non-Hispanic, and female-headed households that are single, divorced, or widowed (Table 4). The median number of years that households were in public housing before transferring to a PBV unit was four, with the range being from one to seventeen years. The median household age is thirty-six with the youngest head of household at the beginning of the study age 23 and oldest 63. The median household size is four and ranges from two to nine members (this study is specifically for families with children). The median number of adults per household is one while the median number of children is two (Table 4).

Table 4. Household Characteristics at Baseline (n=48)

		Count	Percent
Gender	Male	5	10.4%
	Female	43	89.6%
Race	White	38	79.2%
	Non-White	10	20.8%
Ethnicity	Hispanic or Latino	17	35.4%
	Non-Hispanic or Latino	31	64.6%
Marital Status	Married/Cohabitating	12	25.0%
	Single/Divorced/Widowed	36	75.0%
		Median	Range
Years in Public Hous	sing	4	1 - 17
Head of Household	Age	36	23 - 63
Household Size		4	2 - 9
Number of Adults in	n Household	1	1 - 4
Number of Children	in Household	2	0 - 7

Although more heads of household are typically employed in PBV units compared to their tenure in public housing, the only year that there is a statistical difference in employment compared to baseline is Year 2 (Table 5).

Table 5. Employment Status

		Baseline	Baseline	<i>p</i> -value ¹
		Unemployed	Employed	
Year 1 (<i>n</i> =48)				
	Unemployed	16	4	0.388
	Employed	8	20	
Year 2 (<i>n</i> =38)				
	Unemployed	12	1	0.039*
	Employed	8	17	
Year 3 (<i>n</i> =29)				
	Unemployed	9	1	0.070
	Employed	7	12	
Year 4 (n=23)				
	Unemployed	5	2	0.109
	Employed	8	8	



Year 5 (<i>n</i> =16)			
Unemployed	4	3	1.000
Employed	4	5	
Year 6 (<i>n</i> =12)			
Unemployed	6	0	2
Employed	1	5	
Year 7 (n=12)			
Unemployed	4	0	2
Employed	3	5	
Year 8 (n=7)			•
Unemployed	2	0	2
Employed	2	3	

^{*} p < 0.05; 1 The exact p-value is calculated based on a binomial distribution because there are 25 or fewer records in at least one cell. 2 No value is reported because each group must have a minimum of one to conduct a statistical comparison.

Annual household income is statistically significantly higher from baseline compared to every year recorded after baseline (Years 1 through 8) for households that moved from public housing to PBV units (Table 6). The median difference at year one was only \$3,222 but at year eight is \$29,188.

Table 6. Annual Household Income

	Baseline Median	Comparison	Median	Z
		Year Median	Difference	
Annual Household Income				
Year 1 (<i>n</i> =48)	\$16,125	\$19,346	\$3,222	-2.757**
Year 2 (<i>n</i> =38)	\$14,496	\$19,297	\$4,801	-3.407**
Year 3 (<i>n</i> =29)	\$15,622	\$23,081	\$7,459	-3.120**
Year 4 (n=23)	\$15,853	\$23,081	\$7,228	-2.616**
Year 5 (<i>n</i> =16)	\$16,125	\$24,281	\$8,157	-1.965*
Year 6 (<i>n</i> =12)	\$11,854	\$21,463	\$9,609	-3.059**
Year 7 (n=12)	\$11,854	\$32,603	\$20,749	-3.059**
Year 8 (<i>n</i> =6)	\$15,853	\$45,041	\$29,188	-2.366*

^{*} p < 0.05; ** p < .01; *** p < .001

After moving into a PBV unit, most households had either no visits or only one visit to a hospital or emergency room for physical health issues over the last year. Visits to a hospital or emergency room for mental health, behavioral health or emotional issues was rare with most households having no visits (Table 7).



Table 7. Physical and Mental Health Outcomes (n=20)

	Median	Range
Number times in the past year any member in the		
household visited a hospital or emergency clinic for		
physical health problems	1	0-15
Number times in the past year any member in the		
household visited a hospital or emergency clinic for		
mental health, behavioral health, or emotional problem	0	0-2

The survey asked households to rank the neighborhood amenities that were most and least important to them (Table 8). The most important neighborhood attribute is low crime rates. This is followed by close proximity to grocery stores and parks and recreation. Respondents also value sidewalks and neighborhoods with low population and housing density.

Table 8. Neighborhood Preferences (n=20)

A neighborhood that has a low crime rate.

A neighborhood close to grocery stores.

A walkable neighborhood with sidewalks.

A neighborhood close to parks and recreation.

A neighborhood with low population and dispersed housing density.

A neighborhood that has a lot of diversity in terms of race, age, family type.

A neighborhood accessible by public transportation.

A neighborhood with low poverty rates.

A neighborhood close to restaurants and shopping.

A neighborhood with job opportunities nearby.

A neighborhood with a community center and/or community events.

A neighborhood close to downtown.

Most Important

> Least Important

The survey asked households to rank the housing and neighborhood amenities most important for their children (Table 9). The most important attribute was each child having their own bedroom. Low crime rates and being close to the children's daycare or school is also valued by respondents.

Table 9. Housing and Neighborhood Preferences for Children (n=20)

Each child has their own bedroom.

The neighborhood has low crime rates.

The home is close to my child/children's school/daycare.

The home is on a quiet street away from heavy traffic.

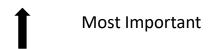
The home is near a park or other recreational activities.

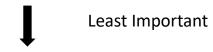
The neighborhood has friendly neighbors that I can count on.

The neighborhood has good schools/daycares.

There are other children in the neighborhood living close by.

The home has a yard that is safe for children to play in.





In the survey, households were asked why they might stay in their current home if they are paying full contract rent (Table 10). Respondents were given the option to select one or multiple reasons. The most



common reason for households to remain in place is because the rent is affordable, and it is too expensive to move somewhere else. Other common reasons include liking the home and neighborhood. Several households wanted to remain in place because their current home is either close to their child's school/daycare, work, or family/friends. A few households don't have time to search for a new place or move. Two of the households plan to move as soon as they can pay full contract rent.

Table 10. Reasons for Staying in Current Home (n=20)

	Freque	ncy
The rent is affordable.		18
I like the neighborhood.		17
I like the home.		16
It is too expensive to move somewhere else.		16
I don't want my child/children to go to a different daycare/school.		10
I am close to work.		9
I am close to family/friends.		7
I don't have time to search for a new place or move.		4
I plan to move as soon as I can pay the full contract rent.		2
I am trying to buy a home.		1
It is quiet here.		1

The survey asked each household to envision their tenure situation in five years (Table 11). The majority believe they will own their own home. Less than half of the respondents believe they will still be receiving subsidized rent – two of the respondents believe they will still be in the same home receiving subsidized rent while one household envisions that they will be in a different home but still receiving a subsidy due to a permanent disability.

Table 11. Future Plans (n=10)

	Frequency	Percent
In the same home with subsidized rent.	2	20%
In a different home with subsidized rent.	1	10%
In the same home paying full contract rent.	2	20%
In a home that you own.	5	50%

For neighborhood characteristics of public housing compared to PBV unit location, there are statistically significant differences in all neighborhood characteristics except for the owner occupancy rate. Educational attainment, median household income, and median home value are all statistically significantly higher in PBV neighborhoods compared to public housing neighborhoods. In the neighborhoods where PBV units are located, the poverty rate, unemployment rate, and proportion of vacant housing units are statistically significantly lower than the neighborhoods where public housing is located. Additionally, in PBV neighborhoods, there are statistically significantly higher proportions of single-family homes and rent rates. In the PBV neighborhoods, there is a higher percentage of White households and less Hispanic or Latino households than in the public housing neighborhoods (Table 10).



Table 10. Neighborhood Characteristics (n=48)

	Public Housing		Median	
	Median	PBV Median	Difference	Z
Percent high school graduate or higher	65.2%	91.2%	26.0%	-5.335***
Percent bachelor's degree or higher	15.0%	26.2%	11.3%	-5.191***
Unemployment rate	9.3%	5.3%	-4.0%	4.114***
Median household income	\$25,545	\$52,008	\$26,463	-4.627***
Percent of people in poverty	40.1%	12.9%	-27.2%	6.032***
Proportion of vacant housing units	9.2%	8.4%	-0.8%	4.547***
Proportion of single-family homes	45.0%	60.9%	15.9%	-3.519***
Owner occupancy rate	44.8%	53.4%	8.6%	-1.600
Median home value	\$100,800	\$164,450	\$63,650	-5.663***
Median gross rent	\$823	\$916	\$93	-1.985*
Percent White	68.5%	83.5%	15.0%	-4.370***
Percent Hispanic or Latino	51.6%	27.1%	-24.6%	4.709***

^{*} p < 0.05; ** p < .01; *** p < .001

For neighborhoods where PBV units are located compared to the Reno Metropolitan Area, neighborhood characteristics throughout Reno are comparable to the neighborhoods where households moved into PBV units (Table 11). The only major differences are the unemployment rate and median home value, which are both lower in neighborhoods where PBV units are located compared to Reno Metropolitan Area.

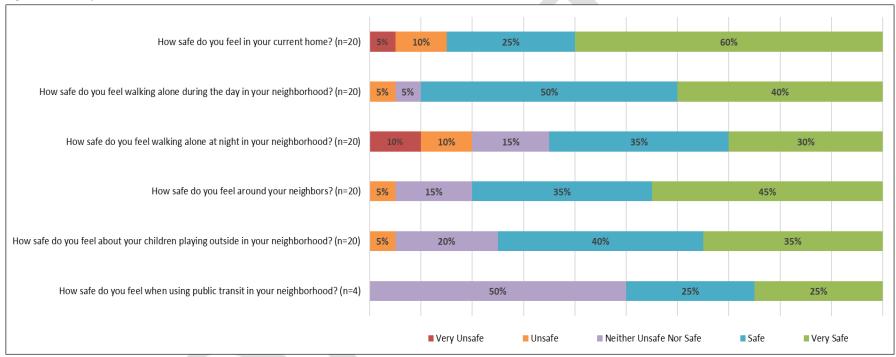
Table 11. Neighborhood Characteristics in PBV Neighborhoods Compared to Reno Metro Area (n=48)

	Reno	PBV Units
Percent high school graduate or higher	87.1%	91.2%
Percent bachelor's degree or higher	28.9%	26.2%
Unemployment rate	8.0%	5.3%
Median Household Income	\$55,103	\$52,008
Percent of people in poverty	14.9%	12.9%
Proportion of vacant housing units	10.0%	8.4%
Proportion of single-family homes	59.9%	60.9%
Owner occupancy rate	57.1%	53.4%
Median home value	\$236,300	\$164,450
Median gross rent	\$917	\$916
Percent White	84%	83.5%
Percent Hispanic or Latino	23.4%	27.1%



Most households feel safe in their home, neighborhood, and around their neighbors. The majority also feel safe when their children are playing outside in their neighborhood. Most survey respondents even feel safe walking alone in their neighborhood at night. The few households that use public transit also consider it to be generally safe.

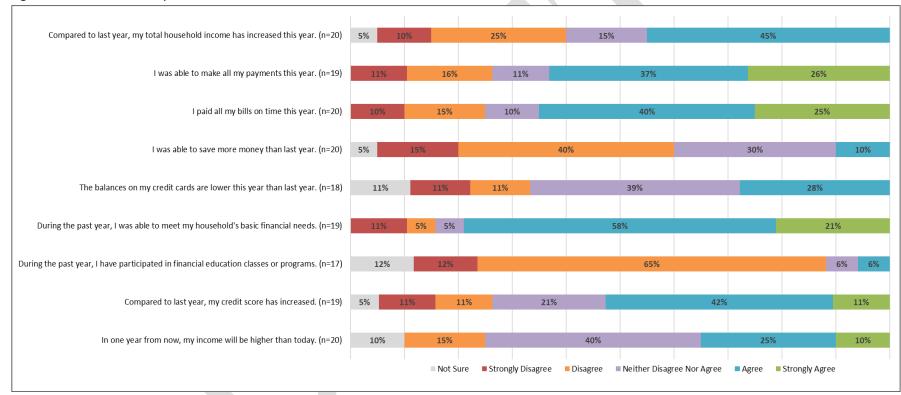
Figure 1. Safety





Compared to last year, 45% of households report that their household income has increased and 79% of households stated that their basic financial needs were met. Most households were able to make all their payments on time over the year, had lower balances on their credit cards compared to the previous year, and report having a higher credit score than last year. However, 55% of households report that they were unable to save more money than the previous year. Very few households participated in financial education classes or programs. The response regarding future income is mixed and only 35% of the households believe that their income will be higher in a year from now.

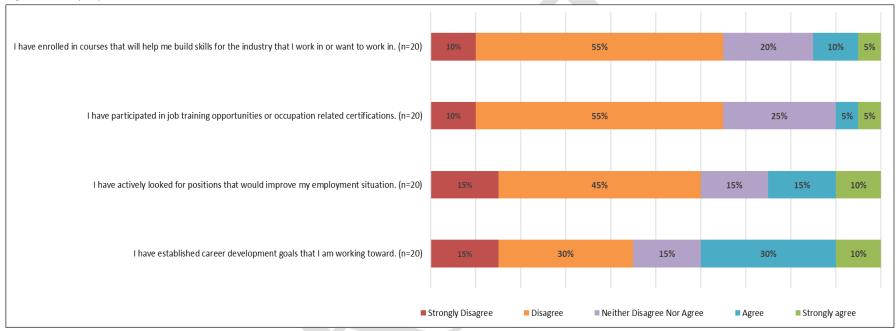
Figure 2. Financial Security and Wealth Accumulation





Within the last year, although some households have established career development goals that they are working toward, few have enrolled in courses or taken advantage of job training opportunities or occupation related certificates. A quarter of the households are actively looking for a position that would improve their employment situation.

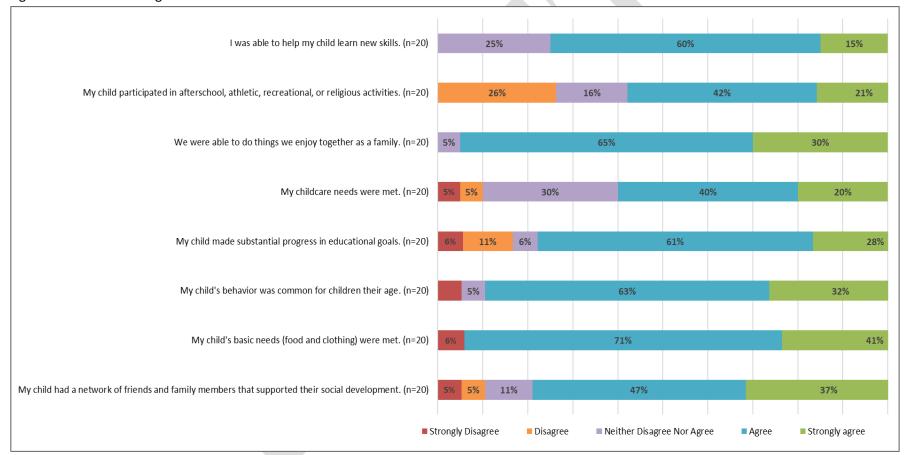
Figure 3. Employment and Education





Most households responded positively regarding their child's well-being. Respondents reported being able to help their child learn new skills, thought their child's basic needs were met, saw substantial progress in educational goals, and were able to do things together as a family. Most households also reported having a network of friends and family members that supported the social development of their child and that they were able to provide the opportunity for their child to participate in after school, athletic, recreational, or religious activities. Childcare needs were met for more than half of the households although there are some households that reported this was a challenge.

Figure 4. Child Well-Being







Attachment IV: Rental Assistance Demonstration (RAD) & Section 18 Repositioning

The Housing Authority of the City of Reno will soon be submitting applications to participate in RAD, Section 18 Demolition/Disposition or both. As a result, RHA will soon submit an application to convert its Public Housing complexes to Project Based Vouchers and Tenant Protection Vouchers (TPV) under the guidelines of PIH Notice 2019-23, REV-4 and any successor notices and PIH Notice 2021-07. Upon conversion to Project Based Vouchers, RHA will adopt the resident rights, participation, waiting list and grievance procedures listed Section 1.6 of H 2019-09/PIH 2019-23, REV-4; and H-2016-17/PIH-2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, RHA 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 RHA 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 RHA may also borrow funds to address their capital needs. RHA received funding from the State's Home Means Nevada Initiative (HMNI) American Rescue Plan Act for each of the Development projects that will be included in the application. RHA will also apply for low-income tax credits, tax-exempt bonds, and other local funds, which combined with RHA funds, will address the capital needs. Regardless of any funding changes that may occur as a result of conversion under RAD or some other repositioning tool allowed by HUD, RHA certifies that it will maintain its continued service level at the initial baseline number of households for public housing as when it entered the MTW Demonstration Program, which is 745 units of Public Housing. Following a portfolio wide repositioning strategy, the agency expects to transition all 745 Public Housing units to either RAD PBV or regular PBV units.

Below please find the specific information related to the Public Housing properties RHA plans to convert to the RAD program:

Development #1: Hawk View Apartments

Name of PH	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Development:		Section 18 Demolition/	
Hawk View	NV39P001007	Disposition or RAD	No
Apartments		PBV/Section 18 Blend	
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation of
			Development:
99	Family	Family	TBD – Relocation, replacement
		-	reserve or other development
			costs will be paid with CF
Bedroom Type	Number of Units	Number of Units Post-	Change in Number of Units
	Pre-Conversion	Conversion	per Bedroom Type and why
Studio/Efficiency	0	TBD	N/A
One Bedroom	0	TBD	N/A
Two Bedroom	99	At least 99	N/A
Three Bedroom	0	TBD	N/A
Four Bedroom	0	0	N/A



Development #2: Stead Manor

Name of PH	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Development:	-		
Stead Manor	NV39P001006	RAD PBV	No
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation of Development:
67	Family	Family	TBD – Relocation, replacement reserve or other development costs will be paid with CF
Bedroom Type	Number of Units	Number of Units Post-	Change in Number of Units
	Pre-Conversion	Conversion	per Bedroom Type and why
Studio/Efficiency	0	0	N/A
One Bedroom	0	0	N/A
Two Bedroom	44	44	N/A
Three Bedroom	23	23	N/A
Four Bedroom	0	0	N/A

Development #3: Silverada Manor

Name of PH	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Development:		RAD PBV/Section 18	
Silverada Manor	NV39P001003	Blend	No
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation of Development:
149	Senior	Senior	TBD – Relocation, replacement reserve or other development costs will be paid with CF
Bedroom Type	Number of Units	Number of Units Post-	Change in Number of Units
	Pre-Conversion	Conversion	per Bedroom Type and why
Studio/Efficiency	22	22	N/A
One Bedroom	64	64	N/A
Two Bedroom	63	63	N/A
Three Bedroom	0	0	N/A
Four Bedroom	0	0	N/A



Development #4: Essex Manor

Name of PH	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Development:	_		
Essex Manor	NV39P001009	RAD PBV	No
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation of Development:
105	Family	Family	TBD – Relocation, replacement reserve or other development costs will be paid with CF
Bedroom Type	Number of Units	Number of Units Post-	Change in Number of Units
	Pre-Conversion	Conversion	per Bedroom Type and why
Studio/Efficiency	0	0	N/A
One Bedroom	0	0	N/A
Two Bedroom	70	70	N/A
Three Bedroom	35	35	N/A
Four Bedroom	0	0	N/A

Development #5: John McGraw Court

Name of PH	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Development:		31	
John McGraw	NV39P001018	RAD PBV	No
Court			
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation of
			Development:
34	Senior	Senior	TBD – Relocation,
			replacement reserve or other
			development costs will be paid
			with CF
Bedroom Type	Number of Units	Number of Units Post-	Change in Number of Units
	Pre-Conversion	Conversion	per Bedroom Type and why
Studio/Efficiency	0	0	N/A
One Bedroom	34	34	N/A
Two Bedroom	0	0	N/A
Three Bedroom	0	0	N/A
Four Bedroom	0	0	N/A



Development #6: Mineral Manor

Name of PH	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Development:		Section 18 Demolition/	
Mineral Manor	NV39P001001	Disposition or RAD	No
		PBV/Section 18 Blend	
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation of
			Development:
144	Family	Family	TBD – Relocation,
	·		replacement reserve or other
			development costs will be paid
			with CF
Bedroom Type	Number of Units	Number of Units Post-	Change in Number of Units
	Pre-Conversion	Conversion	per Bedroom Type and why
Studio/Efficiency	0	TBD	N/A
One Bedroom	35	At least 35	N/A
Two Bedroom	52	At least 52	N/A
Three Bedroom	43	At least 43	N/A
Four Bedroom	14	At least 14	N/A

Development #7: Tom Sawyer Village

Name of PH	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Development:		Section 18 Demolition/	
Tom Sawyer Village	NV39P001002	Disposition or RAD PBV/Section 18 Blend	No
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation of Development:
100	Senior/Disabled	Senior/Disabled	TBD – Relocation, replacement reserve or other
			development costs will be paid with CF
Bedroom Type	Number of Units	Number of Units Post-	Change in Number of Units
	Pre-Conversion	Conversion	per Bedroom Type and why
Studio/Efficiency	24	At least 24	N/A
One Bedroom	50	At least 50	N/A
Two Bedroom	26	At least 26	N/A
Three Bedroom	0	0	N/A
Four Bedroom	0	0	N/A



Development #8: Myra Birch Manor

Name of PH	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Development: Myra Birch Manor	NV39P001010	RAD PBV	No
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund allocation of Development:
56	Family	Family	TBD – Relocation, replacement reserve or other development costs will be paid with CF
Bedroom Type	Number of Units	Number of Units Post-	Change in Number of Units
	Pre-Conversion	Conversion	per Bedroom Type and why
Studio/Efficiency	0	0	N/A
One Bedroom	0	0	N/A
Two Bedroom	56	56	N/A
Three Bedroom	0	0	N/A
Four Bedroom	0	0	N/A

Over time, RHA intends to reposition all eight of its Public Housing sites. Staff is still determining the Scope of Work for each of the projects noted. As a result, RHA's Relocation Plan is not available with this RAD Amendment. RHA is currently working to procure a relocation firm who will help draft the Relocation Plan and assist with relocation activities of tenants being temporarily displaced due to conversion. The Relocation Plan will be written based on HUD recommendations and adhere to the requirements set forth in H-2016-17/PIH-2016-17. The Plan will describe the procedures that RHA intends to follow to assist each family at the sites undergoing a conversion where relocation is applicable.

Resident Rights, Participation, Waiting List and Grievance Procedures

Section 1.6 Special Provisions Affecting Conversions to Project Based Vouchers from PIH Notice 2019-23, REV-4.

1. No Rescreening of Tenants upon Conversion. Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility requirements for actions that occur after conversion. Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice. Thus, Section 8(o)(4) of the 1937 Act and 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement.

These protections also apply when a household is relocated to facilitate new construction or repairs following conversion and subsequently returns to the Covered Project.



- 2. Right to Return. Any resident that may need to be temporarily relocated to facilitate rehabilitation or construction has a right to return to an assisted unit at the Covered Project once rehabilitation or construction is completed. Permanent involuntary displacement of residents may not occur as a result of a project's conversion of assistance, including, but not limited to, as a result of a change in bedroom distribution, a de minimis reduction of units, the reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to facilitate social service delivery. Where the transfer of assistance to a new site is warranted and approved, residents of the Converting Project will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete.
- 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 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 the owner must follow according to the phase-in period established. For purposes of this section "Calculated PBV TTP" refers to the TTP calculated in accordance with regulations at 24 CFR § 5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

Three Year Phase-In:

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



- Year 3: Year 3 AR and any IR prior to Year 4 AR − 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications Full Calculated PBV TTP

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

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

However, PHAs should note that until provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act are implemented, there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984, 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. Further, upon conversion to PBV, if the PHA no longer has a public housing program, funds already escrowed for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

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



- a. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Owner termination of tenancy and eviction (which MTW agencies may not alter), the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:
 - i. A reasonable period of time, but not to exceed 30 days:
 - 1. If the health or safety of other tenants, owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - 2. In the event of any drug-related or violent criminal activity or any felony conviction;
 - ii. Not less than 14 days in the case of nonpayment of rent; and
 - iii. Not less than 30 days in any other cases, except that if a state or local law provides for a shorter period of time, such shorter period shall apply.
- **b. Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act. For the termination of assistance and several other PHA determinations, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:
 - i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555 (a)(1)(i)-(v), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to an Owner's 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 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 Owner or Contract Administrator.
 - iii. The 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 Owner provides opportunity for an informal hearing before an eviction.

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



7. Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon the 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 no receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver.

8. Jobs Plus. N/A

9. When Total Tenant Payment Exceeds Gross Rent. Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. During any period when the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC.

Unless a waiver is requested and approved as described below, any new admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract



because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has left the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR § 983.207 or, where "floating units have been permitted, Section 1.6.B.10 of the Notice.

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

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

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

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

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

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

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



PBV: Other Miscellaneous Provisions

- 1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration. PHAs and the Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
- 2. Ongoing PHA Board Review of Operating Budget. The Owner must submit to the administering PHA's Board the operating budget for the Covered Project annually. The PHA's Board must confirm that the Owner is making deposits into the Reserve for Replacement account in accordance with the RCC as well as assess the financial health of the Covered Project.
- 3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). These sections have been moved to 1.4.A.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 shall apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
 - a. Transferring an existing site-based waiting list to a new site-based waiting list.
 - b. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
 - c. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
 - d. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

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

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

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify



applicants on the waiting list of the transfer of assistance, and on how they can apply for residency at other sites.

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

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

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

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

- **5. Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
- **6. Future Refinancing.** Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC but HUD review of liens must be performed prior to execution.
- 7. Administrative Fees for Public Housing Conversions During the Year of Conversion. For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the "year of conversion"), RAD PBV projects will be funded with public housing funds. For example, if the project's assistance converts effective July 1, 2015, the public housing ACC between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV HAP Contract will be funded with



public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.

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

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

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

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

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

9. Reserve for Replacement. The 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 Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines.

10. Initial Certifications and Tenant Rent Calculations. The Contract Administrator uses the family's public housing tenant rent (reflected on line 10f of the family's most recent HUD Form 50058) at the date of the conversion to calculate the PBV HAP and tenant rent until the effective date of the earlier of the family's first regular or interim recertification following the date of conversion. At the earlier of the family's first regular or interim recertification, the Contract Administrator will use the family's TTP based on the recertification and the HCV utility allowance (or the PBV site-specific utility allowance, if applicable) to determine the PBV HAP and tenant rent. This means that the family pays the same tenant rent as the family was paying under the public housing program until the earlier of first regular or interim reexamination following conversion, at which point the normally applicable PBV calculation for the tenant rent becomes effective. (Under the PBV program, the monthly HAP is the rent to owner minus the tenant rent, and the tenant rent is the family TTP minus the utility allowance.)

Significant Amendment Definition

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

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





U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT Office of Public and Indian Housing Office of Housing

Special Attention of: Notice H 2016-17

Public Housing Agencies PIH 2016-17 (HA)

Public Housing Hub Office Directors

Public Housing Program Center Directors Issued: November 10, 2016

Multifamily HUB Directors

Multifamily Program Center Directors

Effective: November 10, 2016

Regional and Field Office Directors

Effective: November 10, 2010

Regional Administrators Expires: This Notice remains in effect until

Performance Based Contract Administrators amended, superseded, or rescinded RAD Transaction Managers

Regional Relocation Specialists Supplements:

PIH Notice 2012-32 (HA) REV-2

Supersedes:

H 2014-09/PIH 2014-17

SUBJECT: Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions.¹

SECTION 1. Purpose, Applicability and Major Provisions of this Notice

1.1. Purpose

This notice (Notice) provides PHAs,² Project Owners, and their RAD development partners with guidance regarding key fair housing and civil rights statutory and regulatory requirements, explains the situations in which HUD is requiring front-end fair housing and civil rights reviews, and provides information regarding the types of information that must be submitted to facilitate HUD's review of certain fair housing and civil rights requirements in connection with public housing conversions under the First Component of RAD. This Notice also includes guidance

¹ While this Notice addresses fair housing and civil rights requirements and relocation requirements, the fair housing and civil rights requirements are not limited to relocation issues.

² Consistent with PIH Notice 2012-32 (HA) REV-2 (PIH 2012-32 (HA) REV-2) (the "RAD Notice"), this Notice uses the term "PHA" to refer to the owner of the project prior to the RAD conversion and "Project Owner" to refer to the owner of the project after the RAD conversion.

regarding key relocation statutory and regulatory requirements, and details relocation requirements under RAD. This Notice only applies to projects converting under the First Component of RAD; it does not apply to the Second Component of RAD.³

The RAD program was established as a tool for preserving and improving low-income housing stock. RAD is intended to facilitate reinvestment in or redevelopment of the long-term-affordable stock of HUD-assisted housing properties. RAD also provides mobility benefits for assisted residents of converted properties through the choice mobility option, allowing these households to access tenant-based Housing Choice Vouchers. In some cases, RAD can be a tool for transfer of rental assistance from distressed or poorly selected sites to new sites in high opportunity areas. In all cases, the objective is to better serve low-income residents and the broader community in complying with fair housing, other civil rights, and relocation laws.

This Notice provides PHAs and Project Owners with guidance relating to planning and implementing public housing (First Component) RAD conversions in a manner consistent with existing fair housing and other civil rights requirements, including, but not limited to, those associated with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, Titles II and III of the Americans with Disabilities Act, the Architectural Barriers Act of 1968, and their implementing regulations. Section 4 of this Notice summarizes key provisions of existing law applicable to RAD transactions.

To further compliance with these existing requirements, PIH 2012-32 (HA) REV-2, issued June 15, 2015 (the "RAD Notice") established that specific PHA decisions and activities planned to be part of a First Component RAD conversion must be reviewed by HUD prior to implementation (the "front-end" fair housing and civil rights reviews). Through a front-end review of the enumerated PHA decisions, HUD seeks to assist PHAs and Project Owners in meeting their fair housing, other civil rights, and relocation obligations. Section 5 of this Notice explains the situations in which HUD is requiring front-end fair housing, other civil rights, and relocation reviews, details the procedures for HUD's front-end review and the type of information that must be submitted for these reviews, and the timeframes for these reviews.

Finally, in Sections 6 and 7 this Notice provides PHAs and Project Owners with guidance regarding RAD program and other statutory and regulatory relocation assistance requirements when planning for or implementing resident moves as a result of a conversion of a public housing project under RAD. This guidance includes reiterated and new requirements, the corresponding required reviews, and explanation of the interaction between RAD relocation procedures and certain existing public housing requirements. PHAs and Project Owners implementing RAD transactions may be subject to (a) the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA),

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³ Important fair housing, other civil rights, and relocation considerations apply also to the Second Component of RAD as provided in the RAD Notice. Participants in the Second Component of RAD must continue to comply with applicable fair housing, civil rights, and relocation statutes and regulations, and HUD may, at any time, initiate compliance or enforcement actions in connection with such requirements. The RAD Notice will continue as the primary source of information on fair housing and other civil rights requirements covering the Second Component of RAD without any change until further notice.

(b) the requirements of Section 104(d) of the Housing and Community Development Act of 1974 (Section 104(d)) if CDBG or HOME funds are included as part of the project, (c) fair housing and other civil rights considerations implicated by relocation activities, and (d) requirements for relocating residents under the RAD Notice.

1.2. PHA and Project Owner Responsibilities

This Notice explains RAD's front-end fair housing and other civil rights review requirements in greater detail than was provided in the RAD Notice and this Notice restates and revises RAD's relocation requirements. However, the fair housing, other civil rights, and relocation requirements that apply to RAD conversions are neither limited to those discussed in this Notice, nor to those specifically reviewed by HUD in the front-end review.

MEETING HUD'S PROCESS AND REVIEW REQUIREMENTS NEVER CONSTITUTES COMPLIANCE WITH SUCH LAWS. THE OBLIGATION TO COMPLY WITH APPLICABLE FAIR HOUSING, OTHER CIVIL RIGHTS, AND RELOCATION LAWS REMAINS WITH THE PHA AND PROJECT OWNER.

The fair housing and civil rights requirements that apply to RAD conversions are not limited to those discussed in this Notice. PHAs and Project Owners are responsible at all times for ensuring that their RAD activities (including those activities implemented by their agents, consultants, contractors, or other RAD team members) comply with all applicable fair housing and civil rights requirements. PHAs and Project Owners shall be accountable for all fair housing and civil rights compliance issues with respect to their RAD activities, whether those activities are undertaken directly or through agents, consultants, contractors, or other RAD team members. While HUD provides this non-exhaustive guidance to assist PHAs and Project Owners during transactions, complying with the requirements set forth in this Notice does not necessarily mean that they, or their agents or consultants, are in compliance with fair housing and civil rights requirements.⁴

This Notice is not intended to, and shall not be construed to, reduce or in any way limit the application of fair housing, other civil rights, and relocation laws and regulations to RAD transactions. For example, HUD's reliance on a PHA's certification that a site meets the site and neighborhood standards required by the RAD Notice is not a determination of compliance with the duty to affirmatively further fair housing or other fair housing and civil rights requirements. As another example, HUD's approval of a site for new construction does not, by itself, constitute a determination of the PHA's compliance with all provisions of Title VI and its duty to affirmatively further fair housing found in the Fair Housing Act and other fair housing and civil rights requirements, nor indicate HUD's approval of the PHA's or locality's overall housing strategy. HUD's approval of a RAD conversion after front-end review reflects only that the project may proceed through the RAD conversion process; it does not constitute a determination

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⁴ The PHA's or Project Owner's agents, consultants, contractors, and other RAD team members may also have fair housing and other civil rights obligations (whether under this Notice or otherwise) and the forgoing does not, in any way, limit the independent obligation of any such parties to ensure their own compliance with applicable fair housing and other civil rights laws.



that the project is in compliance with applicable fair housing, civil rights, and relocation requirements.

HUD's approval of a front-end review submission is based on limited information and is intended to assist the PHA or Project Owner in meeting their fair housing, civil rights, and relocation obligations.⁵ The PHA is responsible for ensuring that its RAD conversion is consistent with its certification to affirmatively further fair housing and complies with applicable civil rights laws.⁶ The front-end reviews described in this Notice shall not be construed to limit other fair housing and civil rights investigations that HUD may conduct. HUD retains all compliance and enforcement authority.

HUD's determination that the PHA or Project Owner has failed to meet submission, certification, or approval requirements with respect to fair housing, other civil rights, or relocation requirements is grounds for terminating a Commitment to enter into a Housing Assistance Payments Contract (CHAP), denying the issuance of a RAD Conversion Commitment (RCC), or denying authority to convert under RAD.

1.3. Applicability

The content of this Notice should not be relied upon in carrying out any other activities funded under any other HUD program, except where specifically directed by HUD.

This Notice supplements the RAD Notice with respect to fair housing and civil rights requirements applicable to public housing properties converting under RAD and with respect to all matters related to the relocation of residents as a result of RAD public housing conversions. To the extent that there is a conflict between this Notice and the RAD Notice, this Notice shall govern. This Notice replaces and supersedes Notice H 2014-09/PIH 2014-17 (issued July 14, 2014).

Upon issuance, the terms of this Notice will apply to all projects that have applied for conversion of assistance under the First Component of RAD but have not yet converted. As this Notice provides guidance, clarification, and explanation regarding fair housing and civil rights requirements that are <u>already</u> applicable to RAD conversions, this Notice shall not affect any front-end civil rights approvals provided by HUD prior to the effective date of this Notice and otherwise shall be effective with respect to front-end civil rights approvals without exception. However, with respect to relocation activities for Converting Projects under the First Component where a PHA has already submitted a Financing Plan pursuant to the RAD Notice at the time of issuance of this Notice, and provided that the Financing Plan has been accepted for full review after initial screening for completeness, the PHA may, within sixty (60) days after issuance of this Notice, request (in writing uploaded to the RAD Resource Desk) to be governed by H 2014-

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⁵ For example, the front-end review is specific to an individual site. A PHA that does not promote fair housing choice outside areas of minority concentration and continues to site affordable housing in minority concentrated areas may be in noncompliance with the duty to affirmatively further fair housing and other fair housing and civil rights obligations, even if the specific site is approved based on the information provided and pursuant to the front- end review of the PHA's site and neighborhood standards submission.

⁶ See 24 C.F.R. § 5.105 and, as applicable, 24 C.F.R. § 983.57(b)(2) or Appendix III of the RAD Notice.



09/PIH 2014-17. For such projects and where otherwise appropriate in cases of hardship as determined by HUD, HUD may apply the terms of H 2014-09/PIH 2014-17 with respect to relocation activities, but not with respect to fair housing and civil rights requirements.

RAD projects which have been awarded Choice Neighborhoods Implementation (CNI) grants are subject to the provisions of the applicable Choice Neighborhoods Notice of Funding Availability (NOFA) and grant agreement regarding site and neighborhood standards and are not subject to the RAD front-end civil rights transaction reviews described in this Notice. For properties being redeveloped with funding under a CNI grant, the relocation requirements set forth in this Notice are superseded by guidance regarding relocation included in the CNI NOFA. Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a Choice Neighborhood project's conversion of assistance.

1.4. Explanation of Major Provisions

This Notice adds to and revises pre-existing guidance related to fair housing, civil rights, and relocation (as contained in the RAD Notice and H 2014-09/PIH 2014-17) with respect to RAD transactions. Among the key provisions and changes are the following:

Fair Housing & Civil Rights

- Reaffirms the applicability of fair housing and civil rights requirements to all RAD-related activities (see, e.g., Section 3.3 and Section 4);
- Reiterates when HUD front-end civil rights review (originally outlined in the RAD Notice) is required in addition to the PHA's analysis and certification of compliance, to assist the PHA and Project Owner to comply with fair housing and civil rights requirements (see Section 5.3);
- Outlines certain conditions under which HUD will conduct a front-end review to determine whether the site is in an area of minority concentration relative to the site's housing market area (see Section 5.4(A));
- Provides guidance, for purposes of the RAD front-end civil rights review, on the concepts of "area of minority concentration" and "housing market area" that are reviewed when determining whether a site is in an area of minority concentration (see Section 5.4(B));
- Elaborates on specific information that HUD will consider, and that PHAs should provide evidence of, in order for a proposed site to meet the existing exceptions to permit new construction in an area of minority concentration, identifies presumptions for meeting the sufficient comparable opportunities exception and describes factors that HUD may consider in evaluating the overriding housing needs exception (see Section 5.4(C) and Section 5.4(D));
- Articulates issues that HUD will consider in completing the front-end civil rights review for transfers of assistance, including, for example, accessibility and minority concentration (see Section 5.5);
- Outlines the information to be submitted for HUD's front-end civil rights review of transactions where unit reductions, unit reconfigurations, or changes in occupancy are proposed (see Section 5.6);
- Identifies the situations where front-end civil rights reviews are required when changes in the accessibility features of a site are made (see Section 5.7(B)); and



Prohibits the Project Owner of a Converted Project with a PBRA HAP contract from
initiating any new leasing or marketing activities (other than leasing and outreach to
households holding a right to return to the Covered Project), including the solicitation,
distribution or acceptance of applications or development of a waiting list, until HUD has
approved the Affirmative Fair Housing Marketing Plan ("AFHMP") (see Section 5.8).

Relocation

- Requires PHAs or Project Owners to prepare a written relocation plan for all transactions that involve permanent relocation or temporary relocation anticipated to exceed 12 months (see Section 6.1);
- Requires PHAs to provide residents with a RAD Information Notice (RIN) in order to ensure that residents are informed of potential project plans and of their rights in connection with RAD prior to submission of the RAD application (see Section 6.6(A));
- Clarifies that the General Information Notice (GIN), when applicable, should be provided as soon as feasible and no later than 30 days following the issuance of the CHAP (see Section 6.6(B));
- Requires Project Owners to provide a notification of Return to the Covered Project, when applicable (see Section 6.6(F));
- Moves the date before which PHAs are prohibited from beginning any physical relocation earlier in the conversion process (specifically, from the date of Closing to the later of the effective date of the RCC and the expiration of the 30- or 90-day RAD Notice of Relocation period, as applicable) (see Section 6.8);
- Clarifies the specific requirements applicable to different types of relocation (e.g., moves within a property, temporary relocation of less than 12 months, etc.) (see, e.g., Section 6.4):
- Provides enhanced guidance on the right to return requirements, any offers of alternative housing options and the documentation that must be retained when tenants choose an alternative housing option and decline their right to return (see, e.g., Section 6.2 and Section 6.10);
- Describes how HUD has administratively implemented URA requirements and URA relocation assistance and payments for displaced persons, when applicable, to residents who choose to decline the right of return and, instead, choose voluntary permanent relocation (see, e.g., Section 6.4(C) through (F) and Section 6.10);
- Requires PHAs to maintain detailed data regarding each household that will be relocated, with key dates of notices and moves (see Section 6.9); and
- Identifies key fair housing and civil rights requirements applicable during relocation (see, e.g., Section 4).

1.5. Request for Public Comment

HUD acknowledges the complexity of the issues addressed in this Notice. This Notice is effective immediately upon issuance, but HUD also seeks comment from the public regarding the clarity and organization of the Notice and regarding areas where the policies and procedures described are unclear or ambiguous. HUD will consider whether changes in response to comments are justified and will implement any appropriate changes in a revision of this Notice. Please submit all comments to RAD@hud.gov within 30 days of the issuance of this Notice.



1.6. Paperwork Reduction Act

In accordance with the Paperwork Reduction Act (PRA), HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number. OMB approved information collection forms will be posted on the RAD website and the <u>Federal Register</u>.





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SECTION 3. Background

3.1. RAD Authority

RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Pub. L. No. 112-55, enacted November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Public Law 113-76, enacted January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Public Law 113-235, enacted December 6, 2014), and the Division L, Title II, Section 237 of the Consolidated Appropriations Act (Public Law 114-113, enacted December 18, 2016), collectively and as it may be further amended from time to time, the "RAD Statute." RAD allows certain eligible properties to convert assistance to longterm project-based Section 8 contracts and has two separate components. The First Component allows projects funded under the public housing program to convert their assistance to long-term, project-based Section 8 rental assistance contracts. Under this component of RAD, public housing agencies (PHAs) may choose between two different Section 8 housing assistance programs: project based vouchers (PBVs) or project-based rental assistance (PBRA). The "Second Component" of RAD allows owners of projects funded under the Rent Supplement (Rent Supp), Rental Assistance Payment (RAP), and Moderate Rehabilitation programs to convert certain units to PBV or PBRA Section 8 units following certain contract expirations or terminations. The RAD Statute is implemented by the RAD Notice.

3.2. Definitions

All capitalized terms defined in the RAD Notice, as amended, shall have the definitions ascribed to them therein unless otherwise specifically noted in this Notice. Pre-conversion projects whose assistance is converting from public housing to Section 8 under RAD are referred to in the RAD Notice and in this Notice as "Converting Projects." Post-conversion projects are referred to in the RAD Notice and this Notice as "Covered Projects."

3.3. Applicable Legal Authorities

Appendix I to this Notice identifies key legal authorities with respect to fair housing, civil rights, and resident relocation. Part 2 of Appendix I provides greater detail regarding federal accessibility requirements set forth in three of the legal authorities described in Appendix I,

⁷ Many of the fair housing and civil rights concepts used throughout this Notice are terms of art that are defined in applicable statutes and regulations identified in Appendix I of this Notice, while others have been developed through judicial interpretation. PHAs and Project Owners should familiarize themselves with these terms of art and should consult 42 U.S.C. § 3602 (Fair Housing Act); 24 C.F.R. §§ 5.152-100.20 (Fair Housing Act); 42 U.S.C. §§ 2000d-2000d-4a (Title VI of the Civil Rights Act of 1964); 24 C.F.R. § 1.2 (Title VI); 29 U.S.C. § 705 (Rehabilitation Act); 24 C.F.R. § 8.3 (Section 504); 42 U.S.C. §§ 12102, 12132, 12181 (Americans with Disabilities Act (ADA)); 28 C.F.R. § 35.104 (Title II of the ADA); and 28 C.F.R. § 36.104 (Title III of the ADA). In addition, many of the relocation concepts are terms of art that are defined in 42 U.S.C. § 4601 *et seq*. (Uniform Relocation Act (URA)), Section 104(d) of the Housing and Community Development Act of 1974 codified at 42 U.S.C. § 5304(d), and their implementing regulations at 49 C.F.R Part 24 and 24 C.F.R. Part 42 subpart C.

Part 1. PHAs and Project Owners must be familiar with these legal authorities and must evaluate, based on the facts of their situation, which legal authorities are applicable in which situations. Failure to comply with any legal authority as applicable to the PHA's or Project Owner's actions or inactions may result in liability under such authority. Appendix I does not attempt to provide a complete and exhaustive explanation of the legal authorities, nor to fully inventory the situations in which each legal authority is applicable. Instead, Appendix I is an overview intended to serve as a general introduction or reminder for PHAs and Project Owners of these fair housing, other civil rights, and relocation authorities and to facilitate their identification of appropriate topics for further research or expert counsel. The recitation of these legal authorities neither expands nor diminishes their applicability to the PHA's and Project Owner's activities in connection with their RAD conversion.

The RAD Statute authorizes the Secretary of HUD to waive or specify alternative requirements for certain provisions of law, except for requirements related to, among others, fair housing and nondiscrimination. In addition to the general application of various federal statutes and their implementing regulations as discussed in Appendix I, below, HUD regulations at 24 C.F.R. § 5.105 apply such authorities to all HUD programs, including RAD.

3.4. Further Information

Because each RAD proposal varies in its scope, this Notice may not address each PHA's or Project Owner's specific circumstances. PHAs and Project Owners should carefully review the laws, regulations, notices, and guidance material referenced in this Notice. Any questions related to the administration of the RAD program should be referred to the appropriate RAD Transaction Manager (TM) or may be emailed to rad@hud.gov.

SECTION 4. Generally Applicable Fair Housing and Civil Rights Requirements Relevant Throughout the RAD Conversion Process

This Section provides a summary overview of key principles regarding program implementation and an overview of generally applicable fair housing and civil rights requirements. Appendix I identifies the key legal authorities from which these principles are derived. These key principals, together and with the legal authorities identified in Appendix I, frame the PHA's efforts to implement a RAD conversion. In some cases, these requirements are particularly relevant to the process of planning the RAD conversion, while in others they have particular relevance for the structure of the RAD transaction itself, and in yet other cases, both. Elements of RAD transactions that have civil rights implications include, but are not limited to, transfers of assistance, temporary and permanent relocation, demolition, site selection, new construction, occupancy policies, changes in unit configuration, increases or reductions in units, waiting list administration policies, policies regarding return of temporarily relocated tenants, substantial rehabilitation or alteration, program accessibility, tenant selection policies and priority transfers, providing information to and communicating with persons with Limited English Proficiency (LEP) and persons with disabilities, reasonable accommodation policies, and Affirmative Fair

⁸ See Pub. L. No. 112-55, as amended.

Housing Marketing Plans (AFHMPs). All PHAs must consider civil rights when structuring these and other elements of their RAD transaction.

RAD transactions are governed by the same civil rights authorities that govern HUD-assisted activities generally. Converting Projects are subject to civil rights and equal opportunity requirements under the public housing regulations, and Covered Projects are subject to civil rights and equal opportunity requirements under the PBV regulations or the PBRA regulations, as applicable. 10 As described further below, the Fair Housing Act prohibits discrimination in housing¹¹ and requires all federal executive departments and agencies to "administer their programs and activities relating to housing and urban development ... in a manner affirmatively to further" fair housing. 12 In addition, all programs or activities receiving Federal financial assistance are subject to Title VI of the Civil Rights Act of 1964 forbidding discrimination on the basis of race, color, and national origin¹³ and Section 504 of the Rehabilitation Act of 1973, which forbids discrimination on the basis of disability and requires that programs or activities receiving Federal financial assistance make such programs or activities "when viewed in its entirety" readily accessible to persons with disabilities and make reasonable accommodation to the needs of persons with disabilities. ¹⁴ RAD transactions are also subject, as applicable, to the requirements of Titles II and III of the Americans with Disabilities Act, Executive Order 11063, and HUD regulations at 24 C.F.R. part 107. Thus, as with the administration of all HUD programs and all HUD-assisted activities, fair housing and civil rights issues must be considered in the administration of the RAD program. PHAs must not implement actions and policies that may have a discriminatory effect on the basis of race, color, sex, national origin, religion, disability, or familial status or that may impede, obstruct, prevent, or undermine efforts to affirmatively further fair housing.¹⁵ Note, in particular, the following requirements:

• Affirmatively Furthering Fair Housing (AFFH): The Fair Housing Act requires that HUD administer its programs and activities in a manner that affirmatively furthers the purposes of the Fair Housing Act. The Fair Housing Act not only prohibits discrimination but, in conjunction with other statutes, directs HUD's recipients, including PHAs, to take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination. Through various statutes, regulations, and executive orders, PHAs must take various actions in accordance and in conjunction with their Fair Housing Act obligation to affirmatively further fair housing. For example, under regulations implementing the United States Housing Act of 1937 (the Act), HUD recipients must, among other requirements, certify that they will affirmatively further fair housing. In addition, under HUD's Affirmatively Furthering Fair Housing (AFFH) rule promulgated July 16, 2015, PHAs must periodically conduct an Assessment

⁹ See 24 C.F.R. § 5.105.

¹⁰ See, e.g., 24 C.F.R. §§ 880.601, 881.601 and 983.8 for civil rights related regulations applicable to PBV and PBRA transactions.

¹¹ See 42 U.S.C. §§ 3601 et seq., and HUD regulations in 24 C.F.R. part 100

¹² 42 U.S.C. § 3608(d) and (e).

¹³ See 42 U.S.C. §§ 2000d et. seq., and HUD regulations in 24 C.F.R. part 1.

¹⁴ See 29 U.S.C. §§ 701 et seq., and HUD regulations in 24 C.F.R. part 8.

¹⁵ See 24 C.F.R. part 1 and part 100 subpart G.

of Fair Housing (AFH) as set out by the rule, either individually or in collaboration with other program participants. ¹⁶ Under the AFFH rule, in order to develop a successful affirmatively furthering fair housing strategy, the PHA must assess the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs. PHAs must ensure that their activities in connection with a RAD conversion are consistent with their AFH, including any applicable joint or regional AFH in which they are a joint participant, and with any applicable Analysis of Impediments to Fair Housing Choice (AI), Fair Housing Equity Assessment, PHA 5-Year Plan, PHA Annual Plan, Moving to Work (MTW) Plan, or related planning documents and other regulatory and programmatic requirements implementing the obligation to affirmatively further fair housing to which they are a party. ¹⁷

- Nondiscriminatory Site Selection: HUD's site and neighborhood standards require that the proposed site is suitable from the standpoint of facilitating and furthering full compliance with the applicable provision of Title VI of the Civil Rights Act, the Fair Housing Act, Executive Order 11063, and Department regulations implementing these authorities. The site must meet the Section 504 site selection requirements in 24 C.F.R. § 8.4(b)(5). Additional provisions appear in 24 C.F.R. § 983.57(b) of the PBV rules and, for PBRA, in Appendix III of the RAD Notice. HUD's Title VI regulation specifically prohibits site selection that has the "purpose or effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination" on the basis of race, color, or national origin. 18 The Title VI regulations also impose an obligation on the part of an applicant or recipient of HUD financial assistance to take actions to overcome the effect of prior discrimination or conditions that limit participation by persons of a particular race, color, or national origin.¹⁹ In addition, HUD's Section 504 regulation prohibits recipients from selecting sites the purpose or effect of which would (1) exclude qualified individuals with disabilities from or deny them the benefit of a program or activity, or otherwise subject them to discrimination; or (2) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities.²⁰ ADA regulations likewise prohibit site selections that have the purpose or effect of excluding individuals with disabilities (including members of the public with disabilities), denying them benefits, or subjecting them to discrimination.²¹ Finally, the Fair Housing Act prohibits discriminatory site selection, including perpetuation of segregation in transfers of assistance and new construction.
- Meaningful Access for Persons with Limited English Proficiency (LEP): The PHA or Project Owner is required to take reasonable steps to ensure (a) they provide meaningful access to programs and activities for persons who have a limited ability to read, speak, or understand English; (b) any person with LEP who will be temporarily relocated or

¹⁶ 24 C.F.R. § 5.150 et seq.

¹⁷ See 24 C.F.R. § 5.150 et seq. and 24 C.F.R. §§ 91.225, 91.325, or 91.425.

¹⁸ See 24 C.F.R. § 1.4(b)(3).

¹⁹ See 24 C.F.R. § 1.4(b)(6).

²⁰ See 24 C.F.R. § 8.4(b)(5).

²¹ See 28 C.F.R. § 35.130(b)(4); 28 C.F.R. § 36.301.

permanently displaced has meaningful access to any public meetings regarding the project; and (c) they provide meaningful access to LEP persons to any information provided to residents including, but not limited to, any relocation notices. Generally, the PHA or Project Owner will be responsible for providing oral interpreters at meetings, including ensuring their competence, and covering any associated translation and interpretation costs.²²

- Effective Communication for Persons with Disabilities: Communications and materials must be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 C.F.R. § 8.6) and with 49 C.F.R. § 24.5, and as applicable, the Americans with Disabilities Act. This includes ensuring that, unless such actions would result in undue financial and administrative burdens or fundamental alterations, notices and resident meetings are provided in appropriate alternative formats as needed, e.g., Braille, audio, large type, accessible electronic communications, assistive listening devices, and sign language interpreters. Even in cases where the proposed actions may result in undue financial and administrative burdens or fundamental alterations, certain actions must still be taken. Specifically, appropriate auxiliary aids and services that would not result in such undue burdens or fundamental alterations must still be provided to ensure effective communication.
- Accessible Meeting Facilities for Persons with Disabilities: Pursuant to regulations implementing Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, as applicable, all programs and activities must be held in accessible locations unless doing so would result in an undue financial and administrative burden on the PHA and/or Project Owner, in which case the PHA or Project Owner must take any action that would not result in such undue burden but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity, e.g., briefings at an alternate accessible site or in-home briefing. Individuals with disabilities must receive services in the most integrated setting appropriate to their needs. The most integrated setting appropriate to the needs of qualified individuals with disabilities is a setting that enables individuals with disabilities to interact with persons without disabilities to the fullest extent possible.²⁴

²² For more information about LEP obligations, see HUD's Limited English Proficiency (LEP) Frequently Asked Questions guidance at

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq#q26.

²³ In selecting locations for consultation with residents, the PHA and/or Project Owner shall be guided by the goal of maximizing participation in an integrated setting so that residents with disabilities and residents without disabilities may hear and consider each other's views. Priority shall be given to using on-site accessible locations (including, e.g., TV rooms or informal gathering places), even if doing so may require multiple sessions with smaller groups of residents. In addition, Title III of the Americans with Disabilities Act requires private entities that operate places of public accommodation, including social service establishments, leasing offices of private housing developments, and certain private housing providers, to comply with certain physical accessibility requirements which are similar to the requirements under Section 504 and Title II.

²⁴ See 28 C.F.R. part 35, Appendix B.

Accessibility for Persons with Disabilities Throughout the Planning and **Implementation Process:** A number of accessibility requirements, including but not limited to site selection, apply to all RAD conversions, as they do to the PHA's activities regardless of the PHA's participation in RAD.²⁵ PHAs and Project Owners should also be aware that state or local laws, regulations, and codes may contain greater accessibility requirements. This Notice provides, in Appendix I, Part 2, an overview of accessibility requirements under existing law. The information in Appendix I, Part 2 is intended to assist with the PHA's or Project Owner's compliance with accessibility requirements. PHAs and Project Owners must review Appendix I, Part 2 early-on in planning for the RAD transaction. PHAs and Project Owners may determine that it is most efficient to address accessibility matters early in the project planning. In addition, PHAs and Project Owners must evaluate, throughout the transaction and based on the facts of their situation, which requirements are applicable in which situations to ensure they appropriately address accessibility requirements. PHAs and Project Owners are responsible for ensuring that the architectural drawings and construction comply with the PHA's and Project Owner's obligations and all Federal civil rights requirements, including accessibility requirements under the Fair Housing Act, Section 504, and the ADA.

Accessibility requirements also apply during all stages of a RAD transaction, including during relocation. Existing information (e.g., resident characteristics forms, including identification of the need for accessible unit features; records of approved reasonable accommodations; and records of the presence of accessible unit features) and the residents themselves should be consulted throughout the process of developing and implementing a RAD conversion. Related activities include, but are not limited to:

- Identifying and maintaining existing and pending reasonable accommodations, including the need for larger units to accommodate live-in aides or special equipment;
- Determining what direct services may be needed as a reasonable accommodation (e.g., packing, moving, identification of temporary housing);
- Identifying accessible unit features and assuring that temporary or permanent replacement housing contains comparable features;
- o Budgeting appropriately to ensure that reasonable accommodations are addressed.

For more information about compliance with accessibility requirements, the PHA or Project Owner should refer to appropriate notices concerning civil rights requirements and may contact HUD's Office of Fair Housing and Equal Opportunity in either the Washington, D.C. or applicable field offices for more specific guidance. For additional, non-exhaustive guidance on providing relocation assistance to persons with disabilities, see Exhibit 3-1 in HUD Handbook 1378.

²⁵ For more detailed information on these laws and their requirements, see PIH Notice 2010-26, issued July 26, 2010 (available at http://www.hud.gov/offices/pih/publications/notices/10/pih2010-26.pdf). While this notice has an expiration date in 2011, because the notice summarizes and discusses regulatory requirements, the information in the notice provides helpful guidance.

- Reasonable Accommodations in Rules, Policies, Practices and Services: Under the Fair Housing Act, the PHA or Project Owner must make reasonable accommodations in rules, policies, practices, and services when such accommodations may be necessary to afford a person with a disability an equal opportunity to use and enjoy a dwelling.²⁶ Under Section 504, the PHA or Project Owner must also make reasonable accommodations to residents with disabilities, which may include providing and paying for structural modifications to dwelling units and public or common use areas. Titles II and III of the ADA provide similar requirements. Common examples of reasonable accommodations that may occur during relocation are permitting an individual with a disability to relocate near public transportation, providing a unit larger than otherwise permitted for a live-in aide, and making exceptions to no-animal rules for assistance and service animals. Accommodations generally need not be made where providing such an accommodation would be an undue financial and administrative burden or a fundamental alteration of the nature of the service. However, reasonable accommodations must be made to the extent the accommodation does not impose an undue financial and administrative burden or a fundamental alteration of the nature of the service. Reasonable accommodations must follow the individual with the disability throughout the RAD process, including during relocation. Furthermore, PHAs and Project Owners may be required to provide particular reasonable accommodations during relocation, such as assistance moving household items.²⁷
- Physical Changes to Dwelling Units, Public and Common Use Areas and Other Facilities for Accessibility: Under the Fair Housing Act, the PHA or Project Owner may be required to permit reasonable modifications. A reasonable modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. Reasonable modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. A request for a reasonable modification may be made at any time during the tenancy. When relocating an individual with a disability who has such modifications in their dwelling unit or public and common use areas because of the individual's disability, regardless of who made them, the PHA or Project Owner has an obligation to provide and pay for such modification in the new dwelling. When considering requests by individuals with disabilities for structural changes to units or public and common use areas, PHAs and Project Owners should take particular note that they may be required to make and pay for such structural modifications as reasonable

²⁶ For additional information regarding reasonable accommodations under the Fair Housing Act, *see* the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Reasonable Accommodations Under the Fair Housing Act (May 17, 2004), at http://www.hud.gov/offices/fheo/library/huddojstatement.pdf.

²⁷ See 49 C.F.R. part 24, Appendix A, § 24.2(a)(8)(vii), which states that under the URA, "Reasonable accommodation of a displaced person with a disability at the replacement dwelling means the Agency is required to address persons with a physical impairment that substantially limits one or more of the major life activities. In these situations, reasonable accommodation should include the following at a minimum: Doors of adequate width; ramps or other assistance devices to traverse stairs and access bathtubs, shower stalls, toilets and sinks; storage cabinets, vanities, sink and mirrors at appropriate heights. Kitchen accommodations will include sinks and storage cabinets built at appropriate heights for access. The Agency shall also consider other items that may be necessary, such as physical modification to a unit, based on the displaced person's needs."

accommodations under Section 504 and because of similar requirements under the ADA even though the Fair Housing Act may only require the owner to allow such changes to be made and paid for by the individual with a disability. Before determining that they are not required to make or pay for structural changes, PHAs and Project Owners are encouraged to consider carefully their obligations under each applicable statute.

SECTION 5. Application of Key Fair Housing and Civil Rights Requirements to RAD Transactions

The generally applicable fair housing and other civil rights requirements described above, and in Appendix I, apply throughout the planning and implementation of a RAD transaction and the PHA is responsible for ensuring compliance with these requirements. As key requirements may be misunderstood, the RAD program has established specific additional procedures to assist RAD participants to ensure they comply with the applicable requirements. Specifically, the RAD Notice established a civil rights eligibility review and criteria for front-end civil rights reviews.

This Section elaborates on these requirements from the RAD Notice. The front-end review procedures described below establish procedures and criteria for the supplemental front-end review and technical assistance, criteria which are specific to the RAD program. Criteria for this supplemental front-end review are informed by, but not the same as, fair housing or civil rights rules and policies generally.

This Section is organized to loosely follow the stages of a RAD conversion transaction, beginning with RAD eligibility and continuing through site selection, transfer of assistance, unit design requirements and marketing. In addition, this Section describes the timing and procedures for submitting data and documents to HUD so that HUD may complete its front-end review. The submission procedures are also designed to serve as a tool for PHAs to identify issues of potential concern at appropriate stages of the RAD conversion and as a tool for HUD to identify potential needs for technical assistance.

5.1. RAD Eligibility Review

To be eligible for RAD, the PHA must meet all eligibility requirements set forth in Section 1.3 of the RAD Notice, including the civil rights threshold requirements found at Section 1.3.G of the RAD Notice. A PHA must not have a charge, cause determination, lawsuit, or letter of findings, referenced in Section 1.3.G of the RAD Notice, against the PHA itself, its transferees, proposed development partners, or sub-recipients that has not been resolved, or is not in the process of being resolved, to HUD's satisfaction. This determination shall be made prior to issuance of the CHAP.

The CHAP may be revoked by HUD if HUD determines that the terms of the conversion would be inconsistent with fair housing and civil rights laws or a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement. HUD may terminate a CHAP or RCC if it determines that the terms of the conversion would be inconsistent with fair housing or civil rights laws or is inconsistent with, would hinder, or would delay satisfaction of a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement.

HUD may terminate an approval to proceed with a RAD conversion if it determines that the terms of the conversion would be inconsistent with fair housing or civil rights laws or a fair housing or civil rights court order, settlement agreement, or voluntary compliance agreement.

5.2. PHA's Proposed Site Selection and Certification

For all RAD conversions, the PHA must comply with all applicable site selection requirements as set forth in this Notice and the RAD Notice and in accordance with any additional applicable published guidance provided by HUD. As set forth in the RAD Notice, conversions of assistance to PBV involving new construction, whether on a new site or on a current site, are subject to the site selection standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (e), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2). All other conversions to PBV, including transfers of assistance to an existing property other than the Converting Project, are subject to the standards set forth in 24 C.F.R. § 983.57(a), (b), (c) and (d), but excluding 24 C.F.R. § 983.57(b)(1) and (c)(2). Site selection requirements set forth at Appendix III of the RAD Notice apply to RAD conversions to PBRA assistance, as does the requirement not to place housing in neighborhoods with highly concentrated poverty based on the criteria formulated for transfers under Section 8(bb) of the United States Housing Act of 1937. PBV and PBRA site selection must also be consistent with the requirements of the Fair Housing Act, Title VI, Section 504, the ADA and their implementing regulations.

It is the PHA's responsibility to ensure that the site selection complies with all applicable site selection requirements, including the requirements of this Notice and the RAD Notice. Pursuant to the RAD Notice, the PHA must certify with the submission of its Annual Plan, Significant Amendment to its Annual Plan, or MTW Plan that it complies with the applicable site selection requirements and must maintain records of its analysis and the data relied upon in making its determination of compliance. The PHA must also determine and subsequently state in the certification that the site is "suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto." Although this Notice provides detail regarding certain civil rights-related site and neighborhood standards, PHAs must certify compliance with <u>all</u> applicable site and neighborhood standards. ³¹

The PHA must also certify that, in conducting its review of site selection for the proposed project, the PHA completed a review with respect to accessibility for persons with disabilities and that the proposed site is consistent with applicable accessibility standards under the Fair Housing Act, Section 504, and the ADA. The site and neighborhood standards for PBV and PBRA require the site to be "suitable from the standpoint of facilitating and furthering full compliance with" the Fair Housing Act and require the site to meet the Section 504 site selection

²⁸ See the provisions of Section 1.6.A.4 of the RAD Notice.

²⁹ 42 U.S.C. § 1437f(bb).

³⁰ For RAD conversions to PBRA, the RAD Notice uses the term "the site and neighborhood is suitable," rather than "the site is suitable." *See* Appendix III of the RAD Notice, paragraph (a).

³¹ See 24 C.F.R. § 983.57 and the RAD Notice at Section 1.4(A)(7)

requirements described in 24 C.F.R. § 8.4(b)(5).³² The Fair Housing Act, as implemented at 24 C.F.R. § 100.205, requires "covered multifamily dwellings" built for first occupancy after March 13, 1991, to contain accessible design features. HUD's Section 504 regulations at 24 C.F.R. § 8.4(b)(5) require that, in determining the site or location of a federally assisted facility, an applicant for assistance or recipient may not make selections the purpose or effect of which would: (i) exclude qualified individuals with disabilities from, deny them the benefits of, or otherwise subject them to discrimination under, any program or activity that receives Federal financial assistance from HUD, or (ii) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities. Title II of the ADA contains a similar requirement that a public entity, such as the PHA, may not, in determining the site or location of a facility, make selections (i) that have the effect of excluding individuals with disabilities from, denying them the benefits of, or otherwise subjecting them to discrimination; or (ii) that have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the service, program, or activity with respect to individuals with disabilities.³³ Factors relevant to a site review under these standards may include, among others:

- Site features, such as inaccessible slopes in routes, lack of accessible sidewalks, curb ramps, accessible parking spaces, and placement of dumpsters or other physical features that would impede access to and movement within the site;
- Building features, such as inaccessible building entrances, other methods of ingress and egress, public and common use areas (e.g., the rental office, parking areas, mail areas, trash areas, community rooms, shared use toilet rooms, laundry facilities and walkways inside and outside that connect these public and common use areas to units), and barriers to access by members of the public; and
- Lack of accessible transit or para-transit and accessible public sidewalks and accessible transportation stops.

When such conditions are present at the site and would exclude individuals with disabilities from, deny them the benefits of, or otherwise subject them to discrimination, or would defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to individuals with disabilities, the site must not be selected unless the proposal includes remediation of the barriers to achieve compliance with accessibility requirements (including identification and remediation of any nonconforming design and construction conditions in "covered multifamily dwellings" under the Fair Housing Act). Remediation of the barriers may include, for example, physical accessibility improvements to the site, arrangements for access to accessible supportive services, or reasonable accommodations for current or prospective residents with disabilities, including members of the public. The Financing Plan submitted to HUD must describe and document resources sufficient to pay for the remediation of accessibility barriers.³⁴

³² See 24 C.F.R. § 983.57(b)(2) (PBV conversions); see also, Appendix III (a) of the RAD Notice (PBRA conversions).

³³ See 28 C.F.R. § 35.130(b)(4).

³⁴ In conducting its review prior to certification, and in preparing for the certification, PHAs and Project Owners may find it useful to consult with their local or regional FHEO office, the United States Access Board, local or state

While all PHAs must certify their compliance with applicable site selection requirements as described in this Section, some RAD transactions will also be subject to a front-end review of the site selection. For transactions involving activities that present site selection issues of greater complexity, as described in Sections 5.3 through 5.5 below, front-end review will allow HUD's Office of Fair Housing and Equal Opportunity (FHEO) to assist the PHA to consider relevant laws and regulations while completing its site selection review and certification.

5.3. RAD Front-End Civil Rights Transaction Review

Fair Housing Act and other civil rights issues may arise throughout a RAD transaction. Under the Fair Housing Act, an assessment of site suitability includes an analysis of the impact that the siting of the project would have on patterns of segregation for protected classes. The Fair Housing Act is of particular importance when a RAD proposal concerns site selection for new construction or reconfiguration of housing on the original public housing site – for example, the unit size distribution (e.g., conversion of larger bedroom size units to one-bedroom units, which may have an adverse impact on housing opportunities for families with children) or a reduction in the number or distribution of accessible units (which may have an adverse impact on housing opportunities for persons with disabilities). RAD conversions involving new construction must also comply with the Fair Housing Act's accessibility requirements.

Compliance with all applicable fair housing and civil rights requirements is the responsibility of both the PHA and the Project Owner. However, to assist with compliance, HUD's Office of Fair Housing and Equal Opportunity (FHEO) will conduct a front-end civil rights review of project proposals containing activities identified as particularly at risk of violating applicable fair housing and civil rights laws. The activities that must be submitted for front-end civil rights review are listed in Section 5.3(A), below.

A) Activities Subject to Front-End Civil Rights Review

All RAD conversions that include one or more of the activities listed below (Sections 5.3(A)(1) through 5.3(A)(9)) are subject to a front-end review for compliance with certain civil rights and fair housing requirements. The specific items that HUD will review in the front-end review will depend on which activities are involved in the specific transaction. A RAD conversion may not include one of the activities below without prior written approval from HUD. All Financing Plans must include evidence that the PHA has secured written approval from HUD for any of the following activities that are included in its RAD conversion:

(1) Conversions of assistance involving new construction, whether on a new site or on a current site, in an area of minority concentration. Front-end review of this activity shall be pursuant to Section 5.4(B), below and, in addition, the PHA shall

architectural access board or other accessibility authority for information on accessibility standards. Other sources of information on accessibility requirements may include protection and advocacy organizations or independent living centers. In addition, the non-HUD resources may provide advice on how to assess accessibility needs and formulate physical accessibility strategies.

- certify in its Annual Plan compliance with site and neighborhood standards applicable to new construction as described in Section 5.2.
- (2) Transfers of assistance where all or a portion of the Converting Project's assistance is transferred to a new site(s) (either new construction or to an existing project) as part of the subject transaction. Front-end review of this activity shall be pursuant to Section 5.5(B), below and, in addition, the PHA shall certify in its Annual Plan compliance with site and neighborhood standards applicable to existing housing as described in Section 5.2.
- (3) Conversions of assistance where the total number of units in the Covered Project is less than the original number of units in the Converting Project (this includes de minimis reductions). Front-end review of this activity shall be pursuant to Section 5.6.
- (4) Conversions of assistance where the Covered Project's unit configuration is different from the unit configuration of the Converting Project. Front-end review of this activity shall be pursuant to Section 5.6.
- (5) Conversions involving a change in occupancy, where the Covered Project serves a different population from the one served by the Converting Project (e.g., when a Converting Project serves families but the Covered Project is subject to an elderly preference or introduction of restrictions or preferences based on age or disability that will change the occupancy of the property). Front-end review of this activity shall be pursuant to Section 5.6.
- (6) Conversions of assistance in which the construction schedule indicates that relocation is likely to exceed 12 months. Front-end review of this activity shall be pursuant to Section 5.7(A).
- (7) Conversions of assistance involving new construction or substantial alteration,³⁵ as those terms are defined in Section 504 of the Rehabilitation Act of 1973. Front-end review of this activity shall be pursuant to Section 5.7(B).
- (8) Conversions of assistance involving a Converting Project subject to a Voluntary Compliance Agreement or Conciliation Agreement with HUD or a Consent Decree or Settlement Agreement with the U.S. Department of Justice or HUD, or where the PHA is subject to such an agreement affecting its entire housing portfolio or otherwise related to the Converting Project. Front-end review of this activity shall be pursuant to Section 5.7(C).

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³⁵ Section 504 defines substantial alteration of a housing project as alterations where a housing project has 15 or more units, and the rehabilitation costs will be 75% or more of the replacement cost of the completed facility. *See* 24 C.F.R. § 8.23 (a).

(9) Conversions of assistance where HUD has identified potential fair housing and civil rights concerns or a history of such concerns. Front-end review of this activity shall be pursuant to Section 5.7(C).

PHAs should note that a proposed RAD conversion may trigger front-end review regarding more than one of the activities listed in subsections (1) through (9) of this Section. For example, depending on the details of the proposal, a new construction on-site project could require review under subsections (1), (3), (4), (5), (6), and (7), or could require review under only subsections (1) and (7).

As part of HUD's review of these elements of the RAD conversion plans, HUD may require that PHAs that are carrying out portfolio or multi-phased conversions provide information on their conversion plans for other projects or subsequent phases to ensure that the overall plans for RAD conversion are consistent with civil rights and fair housing.

B) Fair Housing, Civil Rights, and Relocation Checklist

In connection with HUD's front-end fair housing and civil rights and relocation reviews described in this Section 5 and in Section 6, HUD is requiring submission of a Fair Housing, Civil Rights, and Relocation Checklist (the "Checklist"). The Checklist will facilitate the PHAs' and Project Owners' submission of necessary information to complete these reviews. HUD anticipates that a revised Checklist, when available following Paperwork Reduction Act approval, will be separated into parts which can be submitted incrementally as the PHA and Project Owner develop the RAD transaction plans, with different elements of the Checklist applicable at different stages of the transaction planning process. For example, submissions regarding site selection for a RAD transaction involving new construction may occur well before submissions regarding a proposal to change the unit configuration.

The Checklist will outline the minimum information or documentation which HUD will need in order to review each part of the Checklist. After HUD's initial review of any portion of the Checklist, HUD may determine that the data provided in the Checklist is insufficient for HUD to complete its review, in which case HUD may require the PHA or Project Owner to provide supplemental information. The PHA should submit each part as early as possible once the information covered in the applicable part is known. All information specified in the applicable

³⁶ The Checklist is available at www.hud.gov/rad. As of the publication of this Notice, references to the Checklist refer to the existing FHEO Accessibility and Relocation Plan Checklist under OMB Approval 2577-0276. The PHA shall use the existing Checklist to provide information related to demonstrating compliance with fair housing, other civil rights, and relocation requirements (including accessibility requirements) and, as necessary, may require additional materials for HUD to complete its review, which the PHA may provide in such form as the PHA determines appropriate. Also at www.hud.gov/rad, HUD has provided a listing of information that, depending on the circumstances, HUD may require to complete different components of its front-end review. The Checklist is being revised to fully capture the submission requirements described in this Notice. The revised Checklist will be subject to Paperwork Reduction Act approval and will be posted at the website listed above when available for use.

part of the Checklist must be submitted to HUD for HUD to begin its civil rights review – partial submissions of any applicable part of the Checklist will not be accepted.³⁷

C) Timing of Front-End Review Submissions

PHAs and Project Owners are encouraged to submit applicable portions of the Checklist and information associated with a particular activity subject to front-end review as early as possible in the development of their plans. The PHA must ensure that HUD has approved all applicable parts of the Checklist prior to submission of the Financing Plan. Upon request from the PHA, HUD may, at HUD's sole discretion, permit submission of the Financing Plan prior to receipt of approval of the applicable parts of the Checklist and conditioned upon subsequent receipt of such approvals, in which event the PHA and Project Owner may proceed at their own risk.

Early approval of the site of the Covered Project is critical for RAD transaction proposals subject to front-end civil rights review involving site selection standards, specifically new construction in areas of minority concentration (see Section 5.3(A)(1)) and transfers of assistance (see Section 5.3(A)(2)). The PHA must conduct its own assessment of the site during the early stages of planning its RAD transaction. The guidance in this Notice and the Checklist are tools intended to assist the PHA in conducting its own assessment of the site.

The PHA must provide HUD with the Checklist and backup information sufficient for HUD to review the site with respect to the applicable standards. The site selection information should be provided to HUD no later than ninety (90) days following the issuance of the CHAP or, if the CHAP has already been issued as of the publication of this Notice, within ninety (90) days following publication of this Notice. In the event of a change in plans for the Converting Project that would require a front-end review of the site selection standards, the PHA must provide the Checklist and backup documentation within sixty (60) days of the change in plans. PHAs are strongly encouraged to provide front-end review submissions and secure HUD approval prior to applying for LIHTCs or taking action the reversal of which (in the event of non-approval of the site) would be detrimental to the PHA or the Project Owner. PHAs are also encouraged to contact FHEO for technical assistance prior to submission of these materials.

All PHAs shall submit a certification consistent with the requirements of Section 5.2, above. This certification may be prepared specifically in connection with the Checklist or as part of the PHA Annual Plan or Significant Amendment. However, HUD will not consider a submission complete for front-end civil rights review without this certification. All RAD conversions must submit the PHA certification described in Section 5.2 no later than at the time of submission of the Financing Plan.

D) Completion of HUD's Front-End Review

HUD will not approve a RAD conversion if HUD determines that the conversion would operate to discriminate in violation of applicable fair housing and civil rights laws. HUD will not approve proposals that have the purpose, intent, or effect of discriminating on the basis of

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³⁷ The Checklist refers to the existing FHEO Accessibility and Relocation Checklist until a revised Checklist is approved for use pursuant to the Paperwork Reduction Act.

protected class (*i.e.*, race, color, national origin, religion, sex, disability, and familial status). If HUD does not approve a proposed activity based on a front-end review, then it will provide a written description of concerns or deficiencies. The PHA may resubmit the front-end review materials with a changed proposal and/or with additional information addressing HUD's concerns and any deficiencies in the proposal or the submission.

In some circumstances, a special condition to the transaction's RCC will be necessary to ensure that a RAD transaction conforms to fair housing and civil rights requirements. Special conditions to the RCC reflect the conditions necessary in order to complete the RAD conversion. For example, if there is an outstanding remedial agreement or order requiring particular development activities or operating policies to correct a violation of a fair housing or other civil rights requirement, the RCC generally will condition participation in RAD upon agreement by the PHA or the Project Owner, as applicable, to comply with the provisions of such agreements or orders after conversion.

5.4. Front-End Civil Rights Review for RAD Transactions Involving New Construction

A) Conditions Triggering Review

If the proposed project is located in an area of minority concentration, the new site may be approved only if it falls under a permitted exception and meets the other site selection requirements described in Section 5.2. Under the PBV and PBRA site and neighborhood standards, HUD may approve new construction in an area of minority concentration, consistent with the regulatory requirements cited above, only if:

- a. Sufficient, comparable housing opportunities for minority families in the income range to be served by the proposed project exist outside areas of minority concentration; or
- b. The project is necessary to meet overriding housing needs that cannot be met in that housing market area.³⁸

As described in the RAD Notice and in Section 5.3(A) of this Notice, above, HUD will conduct a front-end civil rights review of the PHA's proposed site in certain circumstances. This Notice specifies that for conversions of assistance involving new construction where there are indications that the site may be located in an area of minority concentration per the criteria in subsections (i), (ii), or (iii), below (whether the construction is located on the existing public housing site or on a new site), HUD will conduct a front-end civil rights review of the site to determine whether the site is in an area of minority concentration and, if so, whether it meets one of the exceptions that would allow for new construction in an area of minority concentration.

The PHA shall submit for HUD front-end review the PHA's findings, together with backup documentation, regarding site selection when the site meets any of the following criteria:

i. The PHA self-identifies the area of the site as an area of minority concentration,

³⁸ 24 C.F.R. § 983.57(e)(3) and Appendix III of the RAD Notice, paragraph (e).

- ii. The census tract of the site meets the extent of minority concentration described in Section 5.4(B)(1), below, or
- iii. An area comprised of the census tract of the site together with all adjacent census tracts, analyzed as a whole, meets the extent of minority concentration described in Section 5.4(B)(1), below.

If any of these three criteria is applicable, HUD will conduct a review to determine whether the site is in an area of minority concentration and, if applicable, whether the proposed site fits one of the exceptions permitting new construction in an area of minority concentration described in this Section 5.4. A proposed RAD transaction which does not meet one of these triggers must still be evaluated by the PHA and the PHA must certify compliance with the site selection requirements as described in Section 5.2, above.

A PHA seeking to undertake new construction must receive written approval from HUD of any site selection subject to front-end review prior to entering into any construction contract for that new construction.

B) Analysis of Areas of Minority Concentration

This Section sets forth the methodology that HUD will use in the analysis of the extent of minority concentration, the area of the site, and the housing market area for purposes of the RAD front-end civil rights review. As noted below, this analysis is fact specific and PHAs may submit documentation to inform HUD's analysis in cases where there is strong evidence that an alternative methodology would be more appropriate.

- (1) For purposes of RAD, a site is considered to be in an area of minority concentration when either (i) the percentage of persons of a particular racial or ethnic minority within the area of the site is at least 20 percentage points higher than the percentage of that minority group in the housing market area as a whole or (ii) the total percentage of minority persons within the area of the site is at least 20 points higher than the total percentage of minorities in the housing market area as a whole.³⁹
- (2) For purposes of RAD, the analysis of an area of minority concentration will use census tracts to approximate the "area" of the site but the analysis may consider alternate proposed geographies instead of the census tract in instances where there is strong evidence that such geography is more appropriate. Strong evidence that an alternative geography is more appropriate includes: (i) that the site is close to the edge of the census tract, (ii) that the population of the census tract is heavily influenced by the size of the Converting Project, or (iii) that the local community

³⁹ The percentage of minorities shall be calculated by subtracting the percentage of White Non-Hispanic persons in the relevant area from 100%. The analysis shall be based on the most recently available decennial census data found at http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_DP_DPDP1&src=pt. However, if such data is more than five years old, and if either the PHA or HUD requests the use of more recent data based on such party's awareness of significant and material shifts in the demographics of the relevant area in the intervening years, the analysis shall be based on the most recent American Communities Survey data.

understanding of the immediate neighborhood dictates a different boundary. Local community understanding of the immediate neighborhood is often informed by factors such as patterns of housing stock (such as different residential densities in different areas or differential housing prices for similar properties), community facilities and amenities (such as schools and commercial areas) or major geographic barriers (such as rivers or interstate highways), among other factors. HUD will determine the site's "area" using the best available evidence and following the legal standards set forth in applicable case law.

(3) For purposes of the RAD analysis under this Section 5.4, a "housing market area" is the geographic region from which it is likely that residents of housing at the proposed site would be drawn for a given multifamily housing project. A housing market area generally corresponds to, as applicable: (i) the Metropolitan Statistical Area (MetroSA); (ii) the Micropolitan Statistical Area (MicroSA); or (iii) if the site is in neither a MetroSA nor a MicroSA, either (x) the county or statistically equivalent area, or (y) the PHA's service area, whichever is larger. The analysis may consider a larger or smaller housing market area in instances where there is strong evidence that such housing market area is more appropriate. Strong evidence that an alternative housing market area is more appropriate may include factors such as regional employment centers and commuting patterns serving such employment centers. A PHA seeking to use an alternative housing market area must consult with HUD and establish to HUD's satisfaction that the methodology for identifying and documenting the alternative housing market area is warranted and sound.

C) The Sufficient Comparable Opportunities Exception

As required by the RAD Notice and noted in Section 5.4(A), one of the exceptions under which the site and neighborhood standards permit new construction in areas of minority concentration is if sufficient, comparable housing opportunities for low-income minority families exist outside areas of minority concentration. This section clarifies HUD's procedures for assessing comparable housing opportunities and evaluating how the proposed new construction will impact the balance of housing choices within and outside areas of minority concentration. It also includes a list of the information PHAs should submit to inform HUD's assessment of relevant factors, and key considerations guiding HUD's analysis of each factor.

Under the governing PBV and PBRA requirements, units are considered comparable opportunities if they are the same household type (e.g., elderly, disabled, family, large family), tenure type (owner, renter), require approximately the same total tenant payment toward rent,

⁴⁰ For further explanation, see, e.g., King v. Harris, 464 F.Supp.827, 839-41 (E.D.N.Y. 1979).

⁴¹ Items (i) and (ii) are consistent with a Core Based Statistical Area as defined by the Office of Management and Budget. For reference, a Core Based Statistical Area consists of the county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core.

serve the same income group, are located in the same housing market area, and are in standard condition. 42

It is important to note that the sufficient comparable housing opportunities exception "does not require that in every locality there be an equal number of assisted units within and outside of areas of minority concentration. Rather, application of this standard should produce a reasonable distribution of assisted units each year, that, over a period of several years, will approach an appropriate balance of housing choices within and outside areas of minority concentration. An appropriate balance in any jurisdiction must be determined in light of local conditions affecting the range of housing choices available for low-income minority families and in relation to the racial mix of the locality's population."⁴³

HUD will assess "the overall impact of HUD-assisted housing on the availability of housing choices for low-income minority families in and outside areas of minority concentration, and must take into account the extent to which the following factors are present, along with other factors relevant to housing choice." Under this exception, it is not sufficient for one factor to be present, nor is it required that all factors be present, as the analysis must consider all relevant facts and evaluate the totality of the circumstances.

- "A significant number of assisted housing units are available outside areas of minority concentration." While HUD must consider all factors relevant to housing choice, 30% or more of deeply subsidized housing units for very low-income persons would be a significant number. To facilitate HUD's consideration of this factor, a PHA should provide the number, occupancy type, and location of all comparable assisted units. 46
- "There is significant integration of assisted housing projects constructed or rehabilitated in the past 10 years, relative to the racial mix of the eligible population."⁴⁷ To facilitate HUD's consideration of this factor, a PHA should provide the name and location of assisted housing projects constructed or rehabilitated in the PHA's jurisdiction in the past 10 years and the demographic characteristics of the residents of each of these projects;
- "There are racially integrated neighborhoods in the locality." To facilitate HUD's consideration of this factor, a PHA should provide the name and census tracts where these racially integrated neighborhoods are located. In general, HUD will consider a neighborhood racially integrated if the neighborhood does not have a high concentration of persons of a particular race or ethnicity when compared to the housing market area in which the neighborhood is located.

⁴² See 24 C.F.R. § 983.57(e)(3)(iv) and Appendix III of the RAD Notice, paragraph (e)(1)(A).

⁴³ 24 C.F.R. § 983.57(e)(3)(iii); see also Appendix III of the RAD Notice, paragraph (e)(1).

⁴⁴ 24 C.F.R. § 983.57(e)(3)(v); see also Appendix III of the RAD Notice, paragraph (e)(1)(B).

⁴⁵ 24 C.F.R. § 983.57(e)(3)(v)(A) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(i).

⁴⁶ Note that this factor is in reference to comparable assisted units that may or may not be in the PHA's portfolio. The presumption stated at the end of this Section (i.e., that sufficient comparable opportunities exist if at least 50% of the comparable hard units in the PHA's portfolio, including PBV developments using the PHA's subsidy, are outside areas of minority concentration) is focused on units within the PHA's portfolio.

⁴⁷ 24 C.F.R. § 983.57(e)(3)(v)(B) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(ii).

⁴⁸ 24 C.F.R. § 983.57(e)(3)(v)(C) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(iii).

- "Programs are operated by the locality to assist minority families that wish to find housing outside areas of minority concentration." Such programs may include measures such as increasing payment standards in excess of 110% of FMR or the use of Small Area FMRs, including in setting exception rents, or reservation of a percentage of HCVs dedicated to support choice mobility selections or implementation of proven mobility counseling and supports for residents, provided the PHA provides sufficient evidence that it will continue such measures. To facilitate HUD's consideration of this factor, a PHA should provide the names of the applicable program(s); the entity responsible for implementing the program(s) (e.g., city, county, state government); and any information demonstrating that the program(s) has been successful or predictably will achieve success in assisting persons who wish to move to non-concentrated areas.
- "Minority families have benefited from local activities (e.g., acquisition and writedown of sites, tax relief programs for homeowners, acquisitions of units for use as assisted housing units) undertaken to expand choice for minority families outside of areas of minority concentration." To facilitate HUD's consideration of this factor, a PHA should provide the names of the applicable activity(s); the entity responsible for implementing the activity(s) (e.g., city, county, state government); and any information demonstrating that the activity(s) has been successful in expanding choice for minority families outside of areas of minority concentration;
- "A significant proportion of minority households has been successful in finding units in non-minority areas under the tenant-based assistance programs" (e.g., the Housing Choice Voucher programs). To facilitate HUD's consideration of this factor, a PHA should provide the number of minority households receiving Housing Choice Vouchers; the number of minority households using HCVs in non-minority areas; and the non-minority census tracts where the HCVs are being used. While each local situation is distinct and HUD must consider all factors relevant to housing choice, 30% or more of new leases signed by minority heads of household using HCVs located in non-minority areas over a period greater than three years prior to the date of HUD's analysis would be a significant proportion.
- "Comparable housing opportunities have been made available outside areas of minority concentration through other programs." To facilitate HUD's consideration of this factor, a PHA should describe the opportunities that have been made available, the location of those opportunities, and the number of minority families that have benefitted from the program in recent years. Such programs could include choice mobility strategies, acquisition strategies to acquire and add to the PHA's portfolio existing apartments in high opportunity areas and transfers of assistance to high opportunity areas.

HUD may consider evidence based on a reliable housing market analysis in evaluating the foregoing factors, along with other factors relevant to housing choice. In the event HUD

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⁴⁹ 24 C.F.R. § 983.57(e)(3)(v)(D); see also Appendix III of the RAD Notice, paragraph (e)(1)(B)(iv).

⁵⁰ 24 C.F.R. § 983.57(e)(3)(v)(E); see also Appendix III of the RAD Notice, paragraph (e)(1)(B)(v).

⁵¹ 24 C.F.R. § 983.57(e)(3)(v)(F); see also Appendix III of the RAD Notice, paragraph (e)(1)(B)(vi).

⁵² 24 C.F.R. § 983.57(e)(3)(v)(G) and Appendix III of the RAD Notice, paragraph (e)(1)(B)(vii).

determines such an analysis would assist in this evaluation, HUD will consult with appropriate parties to establish or accept an appropriate methodology for such an analysis to address HUD's civil rights concerns and to ensure appropriate independence between the analyst and the PHA or Project Owner commissioning and paying for the study.

Absent information to the contrary, for purposes of HUD's front-end review of the PHA's analysis, HUD will apply a presumption that sufficient comparable opportunities exist if at least 50% of the comparable hard units in the PHA's portfolio, including PBV developments using the PHA's subsidy, are outside areas of minority concentration. The PHA's portfolio includes all public housing, PBV and PBRA hard units (including those developed under HOPE VI or Choice Neighborhoods) controlled by the PHA and its instrumentalities or funded using PHA-controlled subsidy. Upon adequate documentation of this presumption, the PHA need not provide additional documentation for HUD's front-end review of the sufficient comparable opportunities exception. This presumption may be rebutted by information to the contrary, including information regarding the preceding factors. In assessing whether sufficient comparable opportunities exist when the presumption does not apply, HUD will consider the factors listed above.

Absent information to the contrary, for purposes of HUD's front-end review of the PHA's analysis, HUD will apply a presumption that sufficient comparable opportunities exist if a set of RAD conversions from a single public housing property, individually or in a combination of transactions, will result in the creation of as many similarly-affordable housing units outside areas of minority concentration as are constructed on the original public housing site. To evaluate the creation of similarly-affordable units, HUD will compare (i) the number of affordable units that will be redeveloped on site, to (ii) the number of similarly-affordable housing units that will be created through new construction, imposition of new long-term affordability restrictions or transfer of RAD assistance to one or more sites outside areas of minority concentration.⁵⁴ Similarly-affordable shall mean RAD units compared to RAD units and LIHTC/non-RAD units compared to LIHTC/non-RAD units. The newly created similarlyaffordable units must be owned, controlled, sponsored, under common ownership, control or sponsorship, or financially supported by the PHA or by an entity with a managing ownership interest in the Project Owner. When a PHA seeks to claim this exception, HUD prefers that the transaction creating the similarly-affordable units on the site outside areas of minority concentration close (with an immediate or delayed HAP effective date, if applicable) prior to the closing of the RAD conversion in the area of minority concentration. However, if the PHA determines that such a sequence is not reasonably possible, unless otherwise approved by HUD the PHA must provide evidence to HUD that the transfer of assistance to a site outside areas of

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⁵³ When determining the percentage of units outside of areas of minority concentration, the PHA must include the number of units planned at the proposed site in its calculations. While not required, PHAs or Project Owners may assist HUD in consideration of this presumption by submitting to HUD a map produced by the Affirmatively Furthering Fair Housing Data and Mapping Tool ("AFFH-T"), as may be available on the HUD website from time to time, showing the location of publicly assisted housing.

⁵⁴ For example, if the PHA proposes to build 25 RAD units, 20 non-RAD LIHTC units and 15 unrestricted units onsite, such a plan could be acceptable if paired with creation of 15 RAD units at one site and 10 RAD units plus 20 non-RAD LIHTC units at a second site. The 15 unrestricted units in the minority concentrated area are not part of the analysis as they are not affordable units.

minority concentration is highly likely to occur and the PHA must contractually agree with HUD to create such units. Evidence that the transfer is highly likely to occur must include:

- The project name and property address of the site of the similarly-affordable units to be created,
- The census tract and data to confirm that it is not in an area of minority concentration,
- Evidence of site control,
- Evidence of zoning to permit construction of the similarly-affordable units if the affordable units are to be created through new construction,
- A reasonable and feasible sources and uses statement for the transaction, and
- Evidence of financing commitments exceeding 90% of the necessary sources to complete the transaction. Evidence of financing commitments must include an LIHTC allocation if the use of LIHTCs is projected.
- D) The Overriding Housing Needs Exception

As noted in Section 5.4(A), the second exception under which the site and neighborhood standards permit new construction in areas of minority concentration is if the project is necessary to meet overriding housing needs that cannot be met in that housing market area. The new construction site selection standards under RAD⁵⁵ outline two examples of circumstances, consistent with fair housing and other civil rights objectives, that would permit the application of the overriding housing needs exception: (1) when the site is "an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood;" or (2) when the site is "located in a neighborhood experiencing significant private investment that is demonstrably improving the economic character of the area (a "revitalizing area")."⁵⁶

(1) Establishing that a Site is an Integral Part of an Overall Local Strategy for the Preservation or Restoration of the Immediate Neighborhood

To establish that a site is an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood, a PHA must document that the locality has a demonstrated commitment to revitalization that includes or is in addition to the RAD conversion, as demonstrated by the following:

- i. The site is located in a defined geographic area that is the subject of an official, currently operational and realistically achievable plan for the improvement or revitalization of the immediate neighborhood (which plan may include areas beyond the immediate neighborhood); and
- ii. The Covered Project conforms to, and the site is integral to, the goals, strategies, and objectives of the improvement or revitalization plan.

⁵⁵ See 24 C.F.R. § 983.57(e)(2) for PBV transactions and paragraph (e) of Appendix III of the RAD Notice for PBRA transactions.

⁵⁶ 24 C.F.R. § 983.57(e)(3)(vi); *see also* Appendix III of the RAD Notice, paragraph (e)(1)(B)(viii)(2). In demonstrating an overriding housing need, the "neighborhood" is determined in each situation based on the overall facts and circumstances and cannot be mechanically determined. The "immediate neighborhood" is generally a smaller geographic area than the "neighborhood."

In determining whether such an official, currently operational and realistically achievable plan for the improvement or revitalization of the area exists, HUD will consider relevant factors including, for example, whether:

- The strategy itself, or a plan supporting the strategy, has been enacted, adopted, or ratified by a municipal, county, or state legislative body;
- There has been progress to implement the plan, or the strategy as a whole.⁵⁷
- The plan or strategy as a whole, or the elements applicable to the Covered Project, are consistent with the jurisdiction's land use or zoning code, development regulations, or other official body of laws or rules;
- Strategies or activities under the plan are incorporated in current public, quasipublic agency or major institutional work plans;
- The plan, or the strategy as a whole, includes objectives and initiatives related to the preservation or restoration of a geography larger than the Converting Project and any associated public housing site;
- A jurisdiction has published solicitations or incentives for development projects in the improvement or revitalization area;
- The plan is incorporated in the applicable jurisdiction's Consolidated Plan or other comprehensive community development plan;
- A jurisdiction has explicitly designated the geographic area for improvement or revitalization (e.g., Business Improvement District; Enterprise Zone designation; Promise Zone designation; Choice Neighborhoods designation);
- An implementing agency has retained a construction firm to break ground on the improvement or revitalization; and/or
- An implementing agency has secured financing, such as the issuance of bonds or final approval for tax increment financing.
- (2) Establishing that the Site is Located in a "Revitalizing Area"

Evidence that the site is located in a revitalizing area experiencing significant private investment that is demonstrably improving the economic character of the area is also an example of a site which meets an overriding housing need. HUD will consider all relevant factors in making a determination that the site is located in a "revitalizing area" but in particular will consider whether:

i. The neighborhood has demonstrated signs of revitalization, through indicators such as low or declining census tract poverty rates, low or declining violent crime rates or evidence of high or increased educational opportunity, high or increasing median

⁵⁷ Indicators of progress should be appropriate to the amount of time since the plan or strategy was developed and there must be a reasonable, supportable expectation that the plan will continue to be implemented. For example, if a plan was launched 3-4 years prior and the initial steps of the plan required implementation of an initiative (such as real estate development) which has a long pre-development planning period, HUD may consider whether there has been activity to seek land development approvals or to develop construction drawings or to secure funding commitments or other activities providing evidence that one or more material elements of the plan or strategy are actually being implemented.

- household income, high or increasing homeownership rates and/or high or increased employment; and
- ii. There is high private and public investment in retail, commercial, or housing development that has occurred or will imminently occur in the area which may include, among other considerations:
 - Evidence of new or improved retail centers, grocery stores, pharmacies, healthcare facilities, community centers, educational and recreational facilities, municipal services, and transportation serving the neighborhood;
 - Evidence of private and public investment or housing development that has occurred or will imminently occur in the area;
 - Evidence of economic conditions that are impacting the preservation of affordable housing in the neighborhood, including indicators of gentrification such as housing costs rising more sharply in the neighborhood than in the jurisdiction overall, accelerated rates of homeownership in the neighborhood, and disproportionate depletion of larger dwellings for families with children.
 - (3) Circumstances in Which an Overriding Housing Needs Exception Does Not Apply

A PHA cannot establish that a site meets the overriding housing needs exception if the only reason the need cannot otherwise be feasibly met is that discrimination on the basis of race, color, religion, sex, national origin, age, familial status, or disability renders sites outside areas of minority concentration unavailable or if the use of this standard in recent years has had the effect of circumventing the obligation to provide housing choice.⁵⁸ For example, the overriding housing needs exception may not be applied if the reason that the project cannot be sited outside of an area of minority concentration is due to community opposition to the project based on the actual or perceived protected characteristics of the residents or prospective residents of the project. In addition, a recipient may not exclusively rely on this exception as a means of siting projects without creating housing opportunities outside of areas of minority concentration or without preserving existing housing outside of areas of minority concentration.

5.5. Front-End Civil Rights Review for RAD Transactions Involving Transfer of Assistance

A) Applicable Standards

Transfers of assistance are subject to the site selection standards for existing or rehabilitated housing set forth in 24 C.F.R. § 983.57(a)-(d), with the exception of 24 C.F.R. § 983.57(b)(1) and (c)(2), for PBV conversions and Appendix III of the RAD Notice for PBRA conversions. All transfers of assistance to a new site(s) are subject to front-end review by HUD, as required by the RAD Notice and noted in Section 5.3(A)(2) of this Notice. Conversions involving a transfer of assistance may also involve one or more of the other activities which trigger front-end review as described in Section 5.3(A). In transfers of assistance involving any of these activities, HUD

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⁵⁸ 24 C.F.R. § 983.57(e)(3)(vi) and Appendix III of the RAD Notice, paragraph (e)(2). The PBRA site and neighborhood standards use the phrase "on the basis of race, color, creed, sex or national origin." See Appendix III of the RAD Notice.

will conduct a front-end review based on the requirements applicable to each activity. A PHA must submit documentation for the front-end civil rights review of each specific activity as required by the relevant sections of this Notice.

B) Analysis of Transfers of Assistance

Through the front-end review of transfers of assistance by FHEO, HUD seeks to assist the PHA in avoiding discrimination on the basis of race, color, national origin, religion, sex, disability or familial status. The front-end review of transfers of assistance will apply the site selection standards for existing/rehabilitated housing.⁵⁹ This review shall consider:

- (1) The accessibility of the proposed site for persons with disabilities;
- (2) The ability of the RAD conversion to remediate accessibility concerns;
- (3) Whether the transfer of assistance would result in assisted units being located in an area where the total percentage of minority persons is significantly higher than the total percentage of minority persons in the area of the original public housing site or in an area where the percentage of persons of a particular racial or ethnic minority is significantly higher than the percentage of that minority group in the area of the original public housing site.⁶⁰ For purposes of this analysis, HUD will examine the minority concentration of:
 - (a) the census tract of the original public housing site compared to the census tract of the proposed site; and
 - (b) an area comprised of the census tract of the original public housing site together with all adjacent census tracts compared to an area comprised of the census tract of the proposed site together with all adjacent census tracts.
- (4) Whether the site selection has the purpose or effect of:
 - (a) Excluding individuals from, denying them the benefits of, or subjecting them to discrimination under the RAD program or the applicable rental assistance program;
 - (b) Excluding qualified individuals with disabilities from or denying them the benefit of the RAD program or the applicable rental assistance program, or otherwise subjecting them to discrimination;
 - (c) Defeating or substantially impairing the accomplishment of the objectives of the RAD program or the applicable rental assistance program with respect to qualified individuals with disabilities; and

⁵⁹ 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, paragraphs (a) through (d). The site selection standards for existing/rehabilitated housing do not apply the minority concentration test used for new construction found at 24 C.F.R. § 983.57(e)(3) and Appendix III of the RAD Notice, paragraph (e).

⁶⁰ While this review is not explicitly called out in 24 C.F.R. § 983.57(d) and Appendix III of the RAD Notice, it is derived from HUD's and the PHA's obligations to comply with civil rights laws and regulations, including those referenced in 24 C.F.R. § 983.57(b)(2) and Appendix III of the RAD Notice.

(d) Excluding individuals with disabilities (including members of the public with disabilities), denying them benefits or subjecting them to discrimination.

Under the RAD Notice, there are other standards for review of a transfer of assistance which are not examined as part of the front-end civil rights review but are examined as part of the RAD Financing Plan review (e.g., criteria formulated for transfers under Section 8(bb) of the United States Housing Act of 1937 regarding neighborhoods with highly concentrated poverty). Identification of considerations for the front-end review do not preclude review by HUD of all standards referenced in the RAD Notice.

5.6. Front-End Civil Rights Review for RAD Transactions Involving Reduction in Number of Units, Changes in Bedroom Distribution of Units and Changes in Occupancy Requirements

The RAD Notice allows PHAs to reduce the number of units, change the bedroom distribution of units, or change the occupancy of projects as part of their RAD conversion. However, the RAD Notice also provides that such changes (including de minimis changes) must undergo a front-end civil rights review and receive approval from HUD prior to submission of the Financing Plan. The Checklist will require data for review along with an explanation, backed by sufficient evidence, of how the PHA determined that that the proposed change will not result in discrimination on the basis of race, color, national origin, religion, sex, disability, familial status, actual or perceived sexual orientation, gender identity or marital status.

A) Review of Reductions in the Number of Units, Reductions or Increases in the Number of UFAS Accessible Units or Changes in Bedroom Distribution

This Section describes the considerations relevant to a front-end review of reductions in units, changes in the number of UFAS accessible units or changes in bedroom distribution. Such changes must not be the result of an intentional effort to discriminate against members of a protected class. For example, reductions or changes, including reductions in UFAS accessible units or which would impede residents with disabilities from having live-in aides, that intended to exclude persons with disabilities would be unlawful discrimination because of a disability.

⁶¹ See Sections 1.4.A.4 and 1.4.A.10 of the RAD Notice.

⁶² Reductions in the number of units, changes in the bedroom distribution of units, or changes in occupancy violate the Fair Housing Act (the Act) if they have a discriminatory effect on the basis of race, color, national origin, religion, sex, disability, or familial status. Unlawful housing discrimination may be established by a policy's or practice's discriminatory intent or by its discriminatory effect, even if not motivated by discriminatory intent, consistent with the standards outlined in 24 C.F.R. § 100.500. A policy or practice can have an unjustified discriminatory effect, even when the provider had no intent to discriminate. Under this standard, a facially-neutral policy or practice that has a discriminatory effect violates the Act if it is not supported by a legally sufficient justification. In addition, the policy or practice violates the Act if the housing developer or provider intentionally discriminates, including for example, by reducing the number of bedrooms with the intent of limiting families with children. Furthermore, the policy or practice may also violate the Act where it creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin. In addition, any changes must conform with the Equal Access rule requirement that determinations of eligibility for housing that is assisted by HUD or subject to a mortgage insured by the FHA shall be made in accordance with program eligibility requirements, and the housing must be made available, without regard to actual or perceived sexual orientation, gender identity or marital status. 24 C.F.R. § 5.105(a)(2).

Similarly, replacing larger units with smaller units so as to exclude families with children would be unlawful discrimination because of familial status.

Additionally, reductions in units or changes in bedroom distribution must not have an unjustified discriminatory effect on members of a protected class. For example, a reduction in units could have a discriminatory impact if it excludes members of a particular race or religion. Reductions or changes that have a disparate impact on a protected class are unlawful under the Fair Housing Act if they are not necessary to achieve a substantial, legitimate, nondiscriminatory interest of the developer or housing provider, or if such interest could be served by another practice that has a less discriminatory effect.

The RAD Notice allows for a de minimis reduction in units at Converting Projects, which includes both a small number of units as well as the reduction of certain units that have been vacant for 24 months prior to application, that are being or will be used for social service delivery, or efficiencies that will be reconfigured to one-bedroom units. In addition, a PHA converting multiple properties can consolidate the de minimis reductions derived from multiple properties at a small number of sites. The RAD Notice also allows for changes in bedroom distribution. Such de minimis reductions are still subject to front end civil rights review and applicable fair housing and civil rights laws.

HUD shall conduct a front-end civil rights review if the plan for a Converting Project results in:

- A reduction in the number of dwelling units in any of the following categories: (i) units with two bedrooms, (ii) units with three bedrooms or (iii) units with four or more bedrooms.
- A reduction in the number of UFAS accessible units;
- An increase in the number of UFAS accessible units for persons with mobility impairments beyond 10% of the units in the Covered Project or 1 unit, whichever is greater.
- An increase in the number of UFAS accessible units for persons with vision and hearing impairments beyond 4% of the units in the Covered Project or 1 unit, whichever is greater.

When a Converting Project is subject to a front-end civil rights review under this subsection, the PHA shall submit to HUD the relevant part of the Checklist together with a justification which must demonstrate that the changes are not the result of discriminatory intent and will not have a discriminatory effect on members of protected classes, particularly families with children and individuals with disabilities. Relevant data for this analysis of the proposed change at the project may include the PHA's overall affordable housing stock, the demand for affordable housing in the market as evidenced by information such as the overall jurisdiction and regional demographic data available from the AFFH Data and Mapping Tool (e.g., both basic demographic and disproportionate housing needs data), the PHA's waiting list or a reliable market study of households seeking assisted housing, compared to the relative proportions of

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⁶³ See Section 1.4.A.4 of the RAD Notice.

units serving any particular household type in the proposed project, the PHA's total housing stock or all assisted housing in the area.

For any increase in UFAS units subject to front-end review, HUD will assess indicators of local need (see Section 5.7(B), below) and whether the change would operate to concentrate individuals with disabilities in a particular property or to exclude individuals with certain types of disabilities from a particular property.

B) Review of Changes in Occupancy Type

RAD conversions that result in the implementation of an admissions preference (e.g., residency preferences or restrictions) at the Covered Project that would alter the occupancy of the property (e.g., family units converting to elderly units, elderly/disabled units converting to elderly only units) are subject to a front-end civil rights review by HUD pursuant to the RAD Notice and Section 5.3(A). A PHA must demonstrate that the proposed change in occupancy type is consistent with the demand for affordable housing in its jurisdiction as demonstrated by factors such as the demographics of its current occupancy, the demographics of its waiting list or a market study. Such preferences, restrictions, or geographic residency preferences must be reflected in a PBRA project's Affirmative Fair Housing Marketing Plan (AFHMP) or, for a PBV project, the PHA's Administrative Plan.

5.7. Other Front-End Civil Rights Review for RAD Transactions

A) Conversions of Assistance in Which the Construction Schedule Indicates that Relocation is Likely to Exceed 12 Months.

The front end civil rights review shall focus on whether the relocation will result in discrimination on the basis of race, color, national origin, religion, sex, disability, and familial status, based primarily, but not exclusively, on the data required in the Checklist.

B) Conversions of Assistance Involving New Construction or Substantial Alteration, as those terms are defined by Section 504.

While the PHA is responsible for compliance with all requirements described in Section 4, above and in this subsection, the front-end review will be conducted based on a review of the Checklist and shall include confirming the provision of any required accessible units and confirming the PHA is applying the appropriate accessibility standards. HUD will require the PHA to provide information regarding the provision of at least the minimum number of units accessible for persons with mobility impairments and units accessible for persons with hearing and vision impairments as required by applicable law (generally 5% of units accessible for persons with mobility impairments and an additional 2% of units accessible for persons with hearing and vision impairments). For purposes of establishing an upper threshold of accessible units below which RAD front-end review will not be required, HUD will accept that up to 10% of units accessible for persons with mobility impairments and up to 4% of units accessible for persons with hearing and vision impairments is consistent with local need, without further review, absent information to the contrary. HUD will consider a PHA's request for higher percentages based, to HUD's satisfaction, on reliable indicators of local need, such as census data or other available current data. HUD is available to assist PHAs in determining appropriate indicators of local

need for units with accessible features. The RAD conversion scope of work submitted with the Financing Plan must reflect the construction or retrofitting of residential units and public and common use areas to comply with all applicable accessibility requirements.

C) Remedial Agreements and Orders.

Front-end review in situations where the Converting Project or PHA is subject to enforcement actions or binding voluntary compliance agreements, settlement agreements, conciliation agreements, or consent decrees or orders of the nature described in Sections 5.3(A)(8) and 5.3(A)(9) shall be conducted on a case-by-case basis as appropriate to the specific situation.

5.8. Affirmative Fair Housing Marketing Plan (AFHMP) Requirements for Projects Converting to PBRA Assistance

For all projects converting to PBRA assistance, a PHA or Project Owner must complete form HUD-935.2A, the Affirmative Fair Housing Marketing Plan (AFHMP) - Multifamily Housing, and submit it to HUD for approval with the RAD Financing Plan.⁶⁴ Affirmative Fair Housing Marketing requirements are designed to achieve a condition in which individuals of similar income levels in the same housing market area have similar housing choices available to them regardless of their race, color, national origin, religion, sex, disability, or familial status.⁶⁵ They are also a means to carry out the mandate of Section 808(e)(5) of the Fair Housing Act that HUD administer its programs and activities in a manner to affirmatively further fair housing. These requirements mandate that PHAs or Project Owners identify groups that are least likely to apply for upcoming housing opportunities and to implement special marketing and outreach activities to ensure that these groups are aware of these opportunities.

The AFHMP must be submitted to HUD with the Financing Plan. A separate AFHMP is required for each distinct PBRA HAP contract. The PHA must submit an AFHMP even if the project has an existing waiting list and is not accepting new applicants. The PHA or Project Owner should consult the instructions in the form HUD 935.2A and HUD's Implementing Affirmative Fair Housing Marketing Requirements Handbook (HUD Handbook 8025.1) for guidance on completing the AFHMP and carrying out an affirmative marketing program. The Handbook provides a detailed resource on the content of the AFHMP, which includes marketing activities, residency preferences, and staff training.

When submitting an AFHMP for HUD approval, the PHA or Project Owner must ensure that the occupancy designation and any residency preferences are consistent with the PHA Plan or Significant Amendment to the PHA Plan, that such designation and preferences are consistent with the Checklist submitted to HUD and that the AFHMP includes affirmative marketing

⁶⁴ The most recent version of the AFHMP is HUD Form 935.2A, OMB Approval Number 2529-0013. *See* 24 C.F.R. § 880.601(a)(2) and 24 C.F.R. § 200.615; *see also* Section 10.8 of the Multifamily Accelerated Processing (MAP) Guide. The PHA or its management agent should consult the instructions in the form HUD 935.2A and HUD's Implementing Affirmative Fair Housing Marketing Requirements Handbook (HUD Handbook 8025.1) for guidance on completing the AFHMP and carrying out an affirmative marketing program. The Handbook provides a detailed resource on the content of the AFHMP, which includes marketing activities, residency preferences, and staff training.

⁶⁵ See 24 C.F.R. § 200.610.

activities that are consistent with its occupancy designation and the populations identified as least likely to apply. Any subsequent changes to occupancy designation or residency preferences shall be proposed, submitted and reviewed in accordance with standard PBRA requirements. If a PHA or Project Owner plans to adopt any local or residency preferences, the Project Owner must submit its Tenant Selection Plan along with the AFHMP (see HUD Handbook 4350.3, page 4-4).

The Multifamily Housing Office of Asset Management and Portfolio Oversight and the Office of Fair Housing and Equal Opportunity ("FHEO") review the AFHMP. FHEO issues HUD's official letter of approval or disapproval. Disapproval letters will specify the reason a plan was rejected and the revisions required. The PHA or Project Owner must make the required changes and resubmit a corrected plan to HUD for approval.

The PBRA contract becomes effective on the first day of a month, following closing. Approval of the AFHMP is not a condition to closing of the RAD conversion. When the project is preparing to accept applications, it must follow its approved AFHMP to ensure that groups least likely to apply are aware of the housing opportunities. The Project Owner is responsible for ensuring that the AFHMP is in place throughout the life of any FHA mortgage or PBRA contract. The Project Owner may not market or lease any unit not occupied by a household exercising its right to remain in or return to the Covered Project prior to approval of the AFHMP. Marketing or leasing includes the solicitation, distribution or acceptance of applications or development of a waiting list.

SECTION 6. RELOCATION REQUIREMENTS

In some cases, as explained in this Section, the activities associated with the RAD transaction may require the relocation of residents. In the event of acquisition, demolition, construction or rehabilitation activities performed in connection with a RAD conversion, the PHA and/or Project Owner⁶⁶ should plan such activities to reasonably minimize any disruption to residents' lives, to ensure that residents are not exposed to unsafe living conditions and to comply with applicable relocation, fair housing and civil rights requirements. As discussed in Section 6.1, below, a written relocation plan is required in some circumstances and strongly encouraged for any conversion resulting in resident moves or relocation. Further, the obligations due to relocating residents under RAD are broader than URA relocation assistance and payments and RAD specifies requirements which are more protective of residents than standard URA requirements, including additional notices (see Section 6.6) and a right to return (see Section 6.2). This Notice requires that certain information be provided to all households, beginning prior to submission of the RAD application.

Any resident who moves as a direct result of acquisition, rehabilitation or demolition for an activity or series of activities associated with a RAD conversion may, depending on the circumstances and length of time of the relocation, be eligible for relocation assistance and payments under the URA. Additionally, Section 104(d) relocation and one-for-one replacement

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⁶⁶ Under the URA, the term "displacing agency" refers to the agency or person that carries out a program or project which will cause a resident to become a displaced person. Projects vary and, for any specific task described in this Notice, the displacing agency may be either the PHA or the Project Owner, as determined by the allocation of roles and responsibilities between the PHA and Project Owner.

housing requirements may also apply when CDBG- or HOME-funds are used in connection with a RAD conversion. The applicability of the URA or Section 104(d) to RAD conversions is fact-specific, which must be determined in accordance with the applicable URA and Section 104(d) regulations.⁶⁷

Eligibility for specific protections under this Notice applies to any person residing in a Converting Project who is legally on the public housing lease, has submitted an application to be added to an existing lease, or is otherwise in lawful occupancy at the time of the issuance of the CHAP and at any time thereafter until conversion of assistance under RAD. All such residents of a Converting Project have a right to return and are eligible for relocation protections and assistance as provided by this Notice. The eligibility criteria set forth in this paragraph apply to the protections under this Notice regardless of whether residents or household members meet the statutory and regulatory requirements for eligibility under URA.⁶⁸

6.1. Planning

If there is a possibility that residents will be relocated as a result of acquisition, demolition, or rehabilitation for a Converting Project, PHAs must undertake a planning process in conformance with the URA statutory and regulatory requirements in order to minimize the adverse impact of relocation (*see* 49 § C.F.R. 24.205). PHAs must also ensure that their relocation planning is conducted in compliance with applicable fair housing and civil rights requirements.

The PHA shall prepare a written relocation plan if the RAD conversion involves permanent relocation (including, without limitation, a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than one year. While a written relocation plan is not required for temporary relocation lasting one year or less, HUD strongly encourages PHAs, in consultation with any applicable Project Owners, to prepare a written relocation plan for all RAD conversions to establish their relocation process clearly and in sufficient detail to permit consistent implementation of the relocation process and accurate communication to the residents. Appendix II contains recommended elements of a relocation plan.

During the planning stages of a RAD transaction and based on the results of this planning process, a PHA must submit applicable portions of the Checklist described in Section 5.3(B) to HUD, together with any required backup documentation, as early as possible once the information covered in the applicable part is known.⁶⁹ All parts of the Checklist must be submitted to HUD prior to submission of the Financing Plan. The Checklist will allow HUD to assist the PHA to comply, and to evaluate the PHA's compliance, with relocation requirements, including civil rights requirements related to relocation.

⁶⁷ 42 U.S.C. § 4601 *et seq.*, 42 U.S.C. § 5304(d), and their implementing regulations at 49 C.F.R Part 24 and 24 C.F.R. Part 42 subpart C.

⁶⁸ A nonexclusive listing of persons who do not qualify as displaced persons under URA is at 49 C.F.R. 24.2(a)(9)(ii). See also, Paragraph 1-4(J) of HUD Handbook 1378. See Section 6.5 of this Notice for discussion of the date of "initiation of negotiations."

⁶⁹ The Checklist refers to the existing FHEO Accessibility and Relocation Checklist until a revised Checklist is approved for use pursuant to the Paperwork Reduction Act.

The following presents a general sequencing of relocation planning activities within the RAD conversion process for informational and planning purposes only. Specific requirements are set forth in the provisions of this Notice.

Stage		Activities
1.	Prior to submission of RAD application	 Determine potential need for relocation in connection with proposed conversion plans. Meet with residents to discuss proposed conversion plans, communicate right to return, and solicit feedback. Provide the <i>RAD Information Notice</i> (RIN) to residents as described in Section 6.6(A) of this Notice.
2.	After submission of RAD application	 Assess the need for relocation planning in connection with proposed conversion plans. Determine if technical assistance would be beneficial to ensuring compliance with relocation requirements. Survey residents to inform relocation planning and relocation process. Develop a relocation plan (see Appendix II for recommended content). Prepare Significant Amendment to PHA Plan and engage with the Resident Advisory Board, residents and the public regarding Plan amendment.⁷⁰
3.	Following issuance of the CHAP, or earlier if warranted	Provide the <i>General Information Notice</i> (GIN) to residents when the project involves acquisition, rehabilitation, or demolition as described in Section 6.6(B) of this Notice and relocation may be required.
4.	While preparing Financing Plan	 Discuss the outlines of the conversion plans and their impact on relocation with the HUD transaction manager. Refine the plan for relocation and integrate the construction schedule into the relocation strategy; seek to minimize offsite or disruptive relocation activities. Identify relocation housing options. Budget for relocation expenses and for compliance with accessibility requirements. Submit the Checklist and, where applicable, the relocation plan. If the conversion involves acquisition, at the discretion of the Project Owner issue Notice of Intent to Acquire (NOIA). If a NOIA is issued, at the discretion of the Project Owner provide residents with appropriate relocation notices as

⁷⁰ Alternatively, the PHA may submit a new PHA Five-Year or Annual Plan, especially if it is on schedule to do so. Under any scenario, the PHA must consult with the Resident Advisory Board and undertake the community participation process.

Stage	Activities
	described in Section 6.6(C) through 6.6(E) of this Notice at
	this time.
5. From RAD Conversion	Meet with residents to describe approved conversion plans
Commitment (RCC) to	and discuss required relocation.
Closing	The effective date of the RCC marks the date of "Initiation"
	of Negotiations" (ION), as defined in the URA (49 § C.F.R.
	24.2(a)(15)).
	If no NOIA was provided while preparing the Financing
	Plan, provide residents with appropriate relocation notices
	as described in Section 6.6(C) through 6.6(E) of this
	Notice.
	Resident relocation may begin following the effective date
	of the RCC, subject to applicable notice requirements.
6. Post-Closing	Ongoing implementation of relocation
	Notify the residents regarding return to the Covered Project
	as described in Section 6.6(F) of this Notice
	Implementation of the residents' right to return

6.2. Resident Right to Return

Any public housing or Section 8 assisted resident that may need to be relocated temporarily to facilitate rehabilitation or construction has a right to return to an assisted unit at the Covered Project once rehabilitation or construction is complete. Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a project's conversion of assistance. The Project Owner satisfies the RAD right to return to a Covered Project if the Project Owner offers the resident household either: a) a unit in the Covered Project in which the household is not under-housed; or b) a unit in the Covered Project which provides the same major features as the resident's unit in the Converting Project prior to the implementation of the RAD conversion. In the case of a transfer of assistance to a new site, residents of the Converting Project have the right to reside in an assisted unit meeting the requirements set forth in this paragraph at the Covered Project (the new site) once the Covered Project is ready for occupancy in accordance with applicable PBV or PBRA requirements.

If proposed plans for a Converting Project would preclude a resident from returning to the Covered Project, the resident must be given an opportunity to comment and/or object to such plans. Examples of project plans that may preclude a resident from returning to the Covered Project include, but are not limited to:

• Changes in bedroom distribution which decrease the size of units such that the resident would be under-housed;⁷²

⁷¹ The right to return is not a right to any specific unit in the Covered Project. Tenancies other than public housing or Section 8 assisted residents (such as commercial tenants) do not hold a right to return and are subject to standard relocation requirements applicable to such tenants under the URA.

⁷² See the RAD Notice for a description of the procedures that must be undertaken if a resident is over-housed.

- Where a) the PHA is reducing the number of assisted units at a property (if authorized to
 do so under Section 1.5.B of the RAD Notice) and b) the resident cannot be
 accommodated in the remaining assisted units;
- The imposition of income eligibility requirements, such as those associated with LIHTC or other program financing, under which the current resident may not be eligible;⁷³ and
- Failure to provide reasonable accommodation to an individual with disabilities, in violation of applicable law, which reasonable accommodation may include installation of accessibility features that are needed by the individual with disabilities.⁷⁴

If the resident who would be precluded from returning to the Covered Project objects to such plans, the PHA must alter the project plans to accommodate the resident's right to return to the Covered Project.

If the resident who would be precluded from returning to the Covered Project prefers to voluntarily and permanently relocate rather than object to the project plans, the PHA must secure informed, written consent to a voluntary permanent relocation in lieu of returning to the Covered Project and must otherwise comply with all the provisions of Section 6.10, below, regarding alternative housing options. The PHA cannot employ any tactics to pressure residents into relinquishing their right to return or accepting alternative housing options. A PHA may not terminate a resident's lease if the PHA fails to obtain the resident's consent and the resident seeks to exercise the right to return.

In the case of a multi-phase transaction, the resident has a right to return to the Covered Project or to other converted phases of the property which have converted and are available for occupancy at the time the resident is eligible to exercise the right to return. A relocated resident should get the benefit of improvements facilitated by the resident's relocation and conversion and completion of future phases cannot be assured. In most cases, this means that the resident's right to return must be accommodated within the Covered Project associated with resident's original unit. However, in those cases where improvements to multiple phases of a site are occurring simultaneously, the PHA or Project Owner may treat multiple Covered Projects on the same site as one for purposes of the right to return. If the PHA or Project Owner seeks to have the resident exercise the right of return at a future phase, the PHA or Project Owner would need to secure the resident's consent to such plan as an alternative housing option pursuant to Section 6.10, below.

In implementing the right of return, the Project Owner shall comply with all applicable fair housing laws and implementing regulations, including, but not limited to, the Fair Housing Act,

⁷³ In these cases, a PHA may elect to exclude some units from the applicable financing program, for example, claiming LIHTC for a subset of the units and not claiming tax credits in connection with the units occupied by households over the LIHTC maximum eligibility of 60% of AMI.

⁷⁴ Refer to the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Reasonable Modifications Under the Fair Housing Act (March 5, 2008), at http://www.hud.gov/offices/fheo/disabilities/reasonable_modifications_mar08.pdf for additional detail regarding applicable standards for reasonable accommodations and accessibility features which must be provided. If the resident has paid for installation of accessibility features in the resident's prior unit, the PHA or Project Owner shall pay for the installation of comparable features in the new unit. Violations of law may also result in other sanctions.

Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and Titles II and III of the Americans with Disabilities Act.

6.3. Admissions and Continued Occupancy Requirements

Resident households may not be denied relocation housing or the right to return based on rescreening, income eligibility, or income targeting. PHAs may only offer housing options with screening, income eligibility or income targeting requirements if the impacted residents meet the admission and occupancy policies applicable to such housing. However, whether or not in a temporary relocation situation, the household remains subject to the applicable program policies regarding continued occupancy of an assisted unit by an incumbent resident of the unit.

6.4. Types of Moves and Relocation

Any time project plans require a resident to move from their current unit, the resident is eligible for assistance as described in this Notice. Assistance may vary depending on the options provided to residents, whether the relocation is temporary or permanent and, if applicable, the length of time the resident is in temporary accommodations.⁷⁵ In all circumstances, the move or relocation must be in compliance with applicable requirements of this Notice and consistent with applicable fair housing and civil rights requirements. Each type of move is discussed below.

A) Moves within the same building or complex of buildings⁷⁶

Temporary or permanent moves within the same building or complex of buildings may be appropriate given the extent of work to be completed to permit phasing of rehabilitation or construction. Moves within the same building or complex of buildings are not considered relocation under RAD and a tenant generally does not become displaced under the URA. Whether permanent (i.e., the tenant will move to and remain in an alternative unit) or temporary (i.e., the tenant will move to another unit and return to their original unit), the PHA or Project Owner must reimburse residents for all reasonable out-of-pocket expenses incurred in connection with any move and all other terms and conditions of the move(s) must be reasonable.⁷⁷ The final move must be to a unit which satisfies the right to return requirements specified in Section 6.2 of this Notice.

⁷⁵ PHAs should note that the definitions of "permanent" vary between the URA and RAD. For example, "permanent displacement" under the URA includes moves from the original building or complex of buildings lasting more than one year. The RAD Notice, meanwhile, considers "permanent relocation" to be separation from the RAD-assisted unit upon completion of the conversion and any associated rehabilitation and construction. The duration of a temporary move may exceed one year. In the case of a transfer of assistance, it is not permanent relocation under RAD when the resident must move from the original complex of buildings to the destination site in order to retain occupancy of the RAD-assisted unit.

⁷⁶ An example of relocation within the same building or complex of buildings would be if one floor of a multi-story building is vacant, and the PHA is moving residents from another floor to the vacant units.

⁷⁷ Failure to reimburse residents for moving or other out-of-pocket expenses and any other terms and conditions of the move which may be unreasonable may result in the resident becoming a displaced person under the URA if the resident subsequently moves from the property.

B) Temporary relocation lasting one year or less

If a resident is required to relocate temporarily, to a unit not in the same building or complex of buildings, for a period not expected to exceed one year in connection with the RAD conversion, the resident's temporarily occupied housing must be decent, safe, and sanitary and the resident must be reimbursed for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation. These expenses include, but are not limited to, moving expenses, increased housing costs (e.g., rent and utilities), meals if the temporary housing lacks cooking facilities (e.g., during a short hotel stay, whether or not on an emergency basis) and other applicable expenses.⁷⁸

C) Temporary relocation initially expected to last one year or less, but which extends beyond one year

In the event that a resident has been temporarily relocated, to a unit not in the same building or complex of buildings, for a period which was anticipated to last one year or less but the temporary relocation in fact exceeds one year, the resident qualifies as a "displaced person" under the URA and as a result immediately becomes eligible for all permanent relocation assistance and payments as a "displaced person" under the URA, including notice pursuant to Section 6.6(E). This assistance would be in addition to any assistance the person has already received for temporary relocation, and may not be reduced by the amount of any temporary relocation assistance.

In such event, the PHA or Project Owner shall offer the resident the opportunity to choose to voluntarily permanently relocate with the offered URA assistance or to choose to remain temporarily relocated based on updated information from the PHA or Project Owner about when they can return to the completed RAD unit. The PHA or Project Owner must present this opportunity to the resident when the temporary relocation extends beyond one year and each time thereafter that the temporary relocation extends beyond the previously anticipated duration. In presenting such opportunity, the PHA or Project Owner must inform the resident in writing that his or her acceptance of voluntary permanent relocation, with the associated assistance, would terminate the resident's right to return to the Covered Project. The PHA or Project Owner must provide the resident with at least 30 days to decide whether to remain in temporary relocation status or to voluntarily relocate permanently.

D) Temporary relocation anticipated to last more than one year

When the PHA anticipates that the temporary relocation, to a unit not in the same building or complex of buildings, will last more than one year, but the resident is retaining the resident's right to return to the Covered Project, the resident is considered temporarily relocated under RAD and is eligible to receive applicable temporary relocation assistance and payments. Under the URA, the resident becomes eligible to receive applicable relocation assistance and payments as a "displaced person" when the temporary relocation period exceeds one year and each time thereafter that the temporary relocation extends beyond the previously anticipated duration, at

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⁷⁸ HUD Handbook 1378, Chapter 2, Section 2-7 governs activities subject to URA requirements and informs, but is not binding upon, any RAD activities not governed by the URA. PHAs may also refer to HUD Form 40030.

which time the PHA or Project Owner shall offer the resident the opportunity to choose to voluntarily permanently relocate or to remain temporarily relocated, as described in Section 6.4(C), above.

In order to allow residents to make the election earlier than required under the URA (thereby avoiding a year in temporary relocation housing prior to electing voluntary permanent relocation), if the PHA or Project Owner anticipates that temporary relocation will last more than one year, the PHA or Project Owner shall provide the resident with an initial option to (a) be temporarily relocated, retain the right to return to the Covered Project when a unit becomes available and receive assistance, including temporary housing and reimbursement for all reasonable out-of-pocket expenses associated with the temporary relocation, or (b) accept RAD voluntary permanent relocation assistance and payments equivalent to what a "displaced person" would receive under the URA. The PHA or Project Owner must inform the resident in writing that his or her acceptance of voluntary permanent relocation, with the associated assistance, would terminate the resident's right to return to the Covered Project. The PHA or Project Owner must provide the resident with at least 30 days to decide whether to remain in temporary relocation status or to voluntarily relocate permanently.

E) Permanent moves in connection with a transfer of assistance

In cases solely involving a transfer of assistance to a new site, resident relocation from the Converting Project to the Covered Project is not, by itself, generally considered involuntary permanent relocation under RAD. However, the URA and/or Section 104(d) is likely to apply in most cases. In cases of a transfer of assistance to a new site where it has also been determined that the URA and/or Section 104(d) apply to the transfer of assistance, residents may be eligible for all permanent relocation assistance and payments for eligible displaced persons under the URA and/or Section 104(d). If the URA applies to a move of this type, the PHA or Project Owner must make available at least one, and when possible, three or more comparable replacement dwellings pursuant to 49 C.F.R. § 24.204(a). However, provided the transfer of assistance unit meets the URA definition of a comparable replacement dwelling pursuant to 49 C.F.R. § 24.2(a)(6), that unit could in fact represent the most comparable replacement dwelling as determined by the agency for purposes of calculating a replacement housing payment, if any, under 49 C.F.R. § 24.402.

Whether or not the URA and/or Section 104(d) apply, under RAD the residents are entitled to relocation assistance and payments, including counseling in preparation for the relocation, written notices of the relocation (including a 90-day RAD Notice of Relocation), and reimbursement for all reasonable out-of-pocket expenses, including moving expenses, incurred in connection with the move. It should be noted that the RAD relocation assistance and payments provided to transferring residents in this paragraph differ from those required under the URA and/or Section 104(d) as described above. Where both frameworks apply, the residents must receive the more extensive protections offered under either framework.

If HUD determines that the distance from the Converting Project to the site of the Covered Project is significant and the resident could not reasonably be required to move to the new site, then HUD will require the PHA to adjust project plans to accommodate the resident in an assisted unit (e.g., a public housing unit, some other project-based Section 8 unit or a market unit

with a housing choice voucher) within a reasonable distance of the site of the Converting Project. HUD will evaluate whether this requirement applies on a case by case basis, considering whether the distance would impose a significant burden on residents' access to existing employment, transportation options, schooling or other critical services. Accommodating the resident may also be satisfied by the resident's consent to an alternative housing option pursuant to Section 6.10. The requirement set forth in this paragraph is in addition to all protections, including, for example, the offer of comparable replacement dwellings, which are required in all instances where a transfer of assistance is subject to the URA and/or Section 104(d).

F) Voluntary permanent relocation

A resident may elect to relinquish their right of return and consent to voluntary permanent relocation pursuant to an alternative housing option offered and accepted according to the procedures described in Section 6.10, which Section specifies protections to ensure the resident's decision is fully informed. By selecting voluntary permanent relocation, the resident is electing to receive RAD permanent relocation assistance and payments which are equivalent to the relocation payments and assistance required to be provided to a "displaced person" pursuant to the regulations implementing the URA.

6.5. Initiation of Negotiations (ION) Date

Eligibility for URA relocation assistance is effective on the date of initiation of negotiations (ION) (49 C.F.R. § 24.2(a)(15)). For Converting Projects, the ION date is the effective date of the RCC. The ION date is also typically the date when PHAs can begin to issue RAD Notices of Relocation (except in the case of acquisitions when the PHA can issue a Notice of Intent to Acquire and RAD Notices of Relocation prior to the ION date). Any person who is in lawful occupancy on the ION date is presumed to be entitled to relocation payments and other assistance.

PHAs and Project Owners should note that prior to the ION date, a resident may be eligible as a displaced person for permanent relocation assistance and payments under the URA if HUD determines, after analyzing the facts, that the resident's move was a direct result of the project. However, resident moves taken contrary to specific instructions from the PHA or Project Owner (for example, contrary to instructions not to move if contained in a General Information Notice) are generally not eligible as a displaced person under the URA.

6.6. Resident Relocation Notification (Notices)

PHAs and Project Owners are encouraged to communicate regularly with the residents regarding project plans and, if applicable, the resulting plans for relocation. When residents may be relocated for any time period (including, without limitation, a move in connection with a transfer of assistance), written notice must be provided to the resident heads of households, including the notices listed below as applicable.⁷⁹ PHAs and Project Owners are also encouraged to provide

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⁷⁹ The notices required under Sections 6.6(B) through 6.6(E) must be delivered in accordance with URA resident notification requirements, including the requirement that the notice be personally served or delivered by certified or registered first class mail return receipt requested. All notices must be delivered to each household (i.e., posting in

additional relocation notices and updates for the residents' benefit as appropriate for the specific situation.

To ensure that all residents understand their rights and responsibilities and the assistance available to them, consistent with URA requirements at 49 C.F.R. § 24.5 and civil rights requirements, PHAs and Project Owners must ensure effective communication with individuals with disabilities, including through the provision of appropriate auxiliary aids and services, such as interpreters and alternative format materials. Similarly, PHAs and Project Owners are required to take reasonable steps to ensure meaningful access for LEP persons in written and oral materials. Each notice shall indicate the name and telephone number of a person to contact with questions or for other needed help and shall include the number for the telecommunication device for the deaf (TDD) or other appropriate communication device, if applicable, pursuant to 24 C.F.R. §8.6(a)(2).

The purpose of these notifications is to ensure that residents are informed of their potential rights and, if they are to be relocated, of the relocation assistance available to them. Two initial notices launch this effort and provide critical information regarding residents' rights. The first, the RAD Information Notice, is to be provided at the very beginning of the RAD conversion planning process in order to ensure residents understand their rights, to provide basic program information and to facilitate residents' engagement with the PHA regarding project plans. The GIN, meanwhile, provides information specifically related to protections the URA provides to impacted residents. Subsequent notices provide more detailed information regarding relocation activities specific to the household, including tailored information regarding eligibility and timelines for relocation.

PHAs should note that a resident move undertaken as a direct result of the project may be eligible to receive relocation assistance and payments under the URA even though the PHA has not yet issued notices to them. Sample notices which may be used as-is or modified to fit the peculiarities of each situation are provided on the RAD website at www.hud.gov/rad.

A) RAD Information Notice

The RAD Information Notice is to be provided to residents at the very beginning of the RAD conversion planning process in order to convey general written information on potential project plans and residents' basic rights under RAD, and to facilitate residents' engagement with the PHA regarding the proposed RAD conversion. The PHA shall provide a RAD Information Notice to all residents of a Converting Project prior to the first of the two meetings with residents required by the RAD Notice, Section 1.8.2, and before submitting a RAD Application. This RAD Information Notice shall be provided without regard to whether the PHA anticipates any relocation of residents in connection with the RAD conversion. The RAD Information Notice must do the following:

common areas is insufficient) and methods of delivery (e.g., certified mail, U.S. mail, or hand delivery) must be documented in the PHA's or Project Owner's files.

- Provide a general description of the conversion transaction (e.g., the Converting Project, whether the PHA anticipates any new construction or transfer of assistance, whether the PHA anticipates partnering with a developer or other entity to implement the transaction);
- Inform the resident that the early conceptual plans are likely to change as the PHA gathers more information, including, among other items, resident opinions, analysis of the capital needs of the property and financing options;
- Inform the resident that the household has a right to remain in the unit or, if any relocation is required, a right to return to an assisted unit in the Covered Project (which may be at the new site in the case of a transfer of assistance);
- Inform the resident that they will not be subject to any rescreening as a result of the conversion:
- Inform the resident that the household cannot be required to move permanently without the resident's consent, except in the case of a transfer of assistance when the resident may be required to move a reasonable distance, as determined by HUD, in order to follow the assisted unit;
- Inform the resident that if any relocation is involved in the transaction, the resident is entitled to relocation protections under the requirements of the RAD program and, in some circumstances, the requirements of the URA, which protections may include advance written notice of any move, advisory services, payment(s) and other assistance as applicable to the situation;
- Inform the resident that any resident-initiated move from the Converting Project could put any future relocation payment(s) and assistance at risk and instruct the resident not to move from the Converting Project; and
- Inform the resident that the RAD transaction will be completed consistent with fair housing and civil rights requirements, and provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.
 - B) General Information Notice (49 C.F.R. § 24.203(a))

The purpose of the General Information Notice (GIN) is to provide information about URA protections to individuals who may be displaced as a result of federally-assisted projects involving acquisition, rehabilitation or demolition. A GIN provides a general description of the project, the activities planned, and the relocation assistance that may become available.

A GIN shall be provided to any person scheduled to be displaced *as soon as feasible* based on the facts of the situation. In certain instances, such as when the PHA knows that a project will involve acquisition, rehabilitation or demolition, "as soon as feasible" may be simultaneous with issuance of the RAD Information Notice. For any RAD conversion involving acquisition, rehabilitation or demolition, "as soon as feasible" shall be no later than 30 days following the issuance of the CHAP. In instances where acquisition, rehabilitation or demolition is not anticipated at the time of the CHAP but project plans change to include such activities, pursuant to this Notice the PHA shall provide the GIN as soon as feasible following the change in project plans.

For RAD, the GIN must do at least the following:

- Inform the resident that he or she may be displaced for the project and generally describe the relocation payment(s) for which the resident may be eligible, the basic conditions of eligibility, and the procedures for obtaining the payment(s);
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she will be given reasonable relocation advisory services, including referrals to replacement properties, help in filing payment claims, and other necessary assistance to help the displaced resident successfully relocate;
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she will not be required to move without 90 days advance written notice;
- Inform the resident that, if he or she qualifies for relocation assistance as a displaced person under the URA, he or she cannot be required to move permanently unless at least one comparable replacement dwelling has been made available;
- Inform the resident that any person who is an alien not lawfully present in the United States is ineligible for relocation advisory services and relocation payments, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child (see 49 C.F.R. § 24.208(h) for additional information);
- Describe the resident's right to appeal the PHA's determination as to a resident's eligibility for URA assistance; and
- Inform the resident that the RAD transaction will be completed consistent with fair housing and civil rights requirements, and provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

Because of the potential confusion caused by evolving policy directions in the RAD program regarding delivery of the GIN, for actions taken prior to the issuance of this Notice, HUD will consider the facts and circumstances of each conversion, with emphasis on the underlying URA requirements, in monitoring and enforcing a PHA's compliance with this requirement.

C) Notice of Intent to Acquire (49 C.F.R. § 24.203(d))

For conversions involving acquisition, the Project Owner (the "acquiring agency") may provide to residents of the Converting Project a Notice of Intent to Acquire (NOIA). The NOIA may be provided no earlier than 90 days prior to the PHA's reasonable estimate of the date of submission of a complete Financing Plan. While eligibility for URA relocation assistance is generally effective on the effective date of the RCC (the ION date), a prior issuance of a NOIA establishes a resident's eligibility for relocation assistance and payments on the date of issuance of the NOIA and prior to the ION date.

D) RAD Notice of Relocation

If a resident will be relocated to facilitate the RAD conversion, the PHA shall provide written notice of such relocation by means of a RAD Notice of Relocation. The RAD Notice of

⁸⁰ Acquisition includes a new ownership entity's purchase of the Covered Project from the PHA, such as a purchase by a single purpose entity, an affiliate or a low-income housing tax credit ownership entity.

Relocation may not be issued until: 1) the effective date of the RCC (the ION date) if the conversion does not involve acquisition; or 2) the earlier of the issuance of the Notice of Intent to Acquire (see Section 6.6(C)) or the effective date of the RCC (the ION date) if the conversion involves acquisition. Prior to issuance of the RAD Notice of Relocation, PHAs and Project Owners should meet with each resident household to provide preliminary relocation advisory services and to determine their needs and preferences.⁸¹

A RAD Notice of Relocation is not required for residents who will not be relocated. As a best practice, PHAs or Project Owners should notify residents that they are not being relocated once that determination has been made if they were previously informed by the GIN and/or by other methods that relocation was a possibility.⁸²

A RAD Notice of Relocation shall provide either: 1) 30-days' notice to residents who will be relocated for twelve months or less; or 2) 90-days' notice to residents who will be relocated for more than twelve months.⁸³ The RAD Notice of Relocation must conform to the following requirements:

- (1) The notice must state the anticipated duration of the resident's relocation.
- (2) The notice must specify which entity (the PHA or the Project Owner) is primarily responsible for management of the resident's relocation and for compliance with the relocation obligations during different periods of time (i.e., before vs. after Closing).
- (3) For residents who will be relocated for twelve months or less:
 - The PHA or Project Owner must provide this notice a minimum of 30 days prior to relocation.⁸⁴ PHAs or Project Owners may deem it appropriate to provide longer notice periods for persons who will be temporarily relocated

⁸¹ PHAs and Project Owners should note the URA relocation advisory services requirement for personal interviews. *See* Section 6.7 of this Notice. In sequencing the RAD Notice of Relocation, PHAs and Project Owners wishing to offer alternative housing options pursuant to Section 6.10 should also note the additional complexity in the timeline of notices. Pursuant to Section 6.10(D), the resident can consent to an alternative housing option only after issuance of the NOIA or the effective date of the RCC and 30 days after presentation of the alternative housing options. In some cases, for example, when the resident would not otherwise be relocated for over twelve months, the RAD Notice of Relocation must include both the information described in Section 6.6(D)(3) and the information in Section 6.6(D)(4). The PHA or Project Owner should consider discussing the alternative housing options prior to issuing the RAD Notice of Relocation so that the RAD Notice of Relocation can be tailored to the resident's situation.

⁸² The RAD program does not require a "notice of non-displacement," which HUD relocation policy generally uses for this purpose.

⁸³ The 90-day notice is required for residents relocated for more than twelve months, whether or not they intend to return to the Covered Project and whether or not they are eligible for assistance and payments as a displaced person under URA. Recipients of the 90-day notice would include those residents who have voluntarily accepted a permanent relocation option as well as those residents who are relocated within the same building or complex of buildings.

⁸⁴ Note that residents may elect to move to the relocation housing before the 30 days have elapsed. However, a PHA may not require a resident to move prior to this time.

- for an extended period of time (over 6 months), or if necessary due to personal needs or circumstances.
- The notice must explain that the PHA or Project Owner will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with any temporary move (including, but not limited to, increased housing costs and moving costs).
- The notice must explain the reasonable terms and conditions under which the resident may exercise the right to return to lease and occupy a unit in the Covered Project.
- (4) For residents who will be relocated for more than twelve months, including for residents who may wish to voluntarily accept a permanent relocation option:
 - The PHA or Project Owner must provide this notice a minimum of 90 days prior to relocation of residents.⁸⁵
 - The notice must offer the choice to be temporarily relocated, thereby preserving the resident's right to return, or the choice to be voluntarily permanently relocated pursuant to the procedures set forth in Section 6.10, together with guidance that the resident has at least thirty (30) days to consider the choice.
 - For residents who voluntarily elect to be permanently relocated, the 90-day notice period may only begin once the PHA or Project Owner has made available at least one comparable replacement dwelling consistent with 49 C.F.R. § 24.204(a).⁸⁶
 - The notice must describe the available relocation assistance, the estimated amount of assistance based on the individual circumstances and needs, and the procedures for obtaining the assistance. The notice must be specific to the resident and his or her situation so that the resident will have a clear understanding of the type and amount of payments and/or other assistance the resident household may be entitled to claim.
 - The notice must comply with all requirements for a URA Notice of Relocation Eligibility as described in 49 C.F.R. § 24.203(b).
- (5) The notice must inform the resident that the relocation will be completed consistent with fair housing and civil rights requirements, and it must provide contact information to process reasonable accommodation requests for residents with disabilities during the relocation.

For short-term relocations, the RAD Notice of Relocation may also contain the information required in the Notice of Return to the Covered Project (see Section 6.6(F)).

⁸⁵ Note that residents may elect to move to the relocation housing before the 90 days have elapsed. However, a PHA may not compel a resident to move prior to this time.

⁸⁶ PHAs should note that URA regulations also require, where possible, that three or more comparable replacement dwellings be made available before a resident is required to move from his or her unit.

E) URA Notice of Relocation Eligibility – for residents whose temporary relocation exceeds one year (49 C.F.R. § 24.203(b))

After a resident has been temporarily relocated for one year, notwithstanding a prior issuance of a RAD Notice of Relocation, the PHA or Project Owner must provide an additional notice: the notice of relocation eligibility in accordance with URA requirements ("URA Notice of Relocation Eligibility"). The URA Notice of Relocation Eligibility is not required if the resident has already accepted permanent relocation assistance.⁸⁷

The URA Notice of Relocation Eligibility must conform to URA requirements as set forth in 49 C.F.R. part 24 and shall:

- Provide current information as to when it is anticipated that the resident will be able to return to the Covered Project.
- Give the resident the choice to remain temporarily relocated based upon the updated information or to accept permanent URA relocation assistance at that time instead of exercising the right to return at a later time.

If the resident chooses to accept permanent URA relocation assistance and this choice requires the resident to move out of their temporary relocation housing, the URA requires that the PHA or Project Owner make available at least one, and when possible, three or more comparable replacement dwellings pursuant to 49 C.F.R. § 24.204(a), which comparability analysis is in reference to the resident's original unit. The URA further requires that the resident receive 90 days' advance written notice of the earliest date they will be required to move pursuant to 49 C.F.R. § 24.203(c).

• Example 1: The household is expected to be relocated for 11 months. The resident would receive a RAD Notice of Relocation offering only temporary relocation. Construction delays result in the extension of the relocation such that, in fact, it exceeds 12 months. When the temporary relocation exceeds 12 months, the resident must receive a URA Notice of Relocation Eligibility offering a choice between continuation in temporary relocation status and permanent relocation.

⁸⁷ To illustrate, consider the following examples.

[•] Example 2: The household is expected to be relocated for 14 months. The resident would receive a RAD Notice of Relocation offering a choice between temporary relocation status and permanent relocation. If the household elects <u>temporary</u> relocation, the URA Notice of Relocation Eligibility is required as an additional notice following twelve months in temporary relocation status.

[•] Example 3: The household is expected to be relocated for 14 months. The resident would receive a RAD Notice of Relocation offering a choice between temporary relocation status and permanent relocation. If the household elects permanent relocation, the URA Notice of Relocation Eligibility is not required.

[•] Example 4: The household can be accommodated with temporary relocation of 3 months, but has been offered and seeks to accept permanent relocation pursuant to an alternative housing option. This resident would receive a RAD Notice of Relocation under Section 6.6(D)(4) offering a choice between temporary relocation status (the default option) and permanent relocation (the alternative housing option), instead of the RAD Notice of Relocation under Section 6.6(D)(3) which would be expected absent a permanent relocation option. The URA Notice of Relocation Eligibility is not required in either case because a temporary relocation exceeding 12 months was never anticipated nor experienced.

F) Notification of Return to the Covered Project

With respect to all temporary relocations, the PHA or Project Owner must notify the resident in writing reasonably in advance of the resident's expected return to the Covered Project, informing the resident of:

- The entity (the PHA or the Project Owner) with primary responsibility for managing the resident's relocation;
- The address of the resident's assigned unit in the Covered Project and, if different from the resident's original unit, information regarding the size and amenities of the unit;
- The date of the resident's return to the Covered Project or, if the precise date is not available, a reasonable estimate of the date which shall be supplemented with reasonable additional notice providing the precise date;
- That the PHA or Project Owner will reimburse the resident for all reasonable out-ofpocket expenses incurred in connection with the return relocation; and
- The resident's options and the implications of those options if the resident determines that he or she does not want to return to the Covered Project and wants to decline the right of return.⁸⁸

Reasonable advance notice shall be 15% of the duration of the resident's temporary relocation or 90 days, whichever is less. For short-term relocations, the PHA or Project Owner may include this information within the RAD Notice of Relocation.

6.7. Relocation Advisory Services

Throughout the relocation planning process, the PHA and Project Owner should be in communication with the residents regarding the evolving plans for relocation. Notwithstanding this best practice, certain relocation advisory services, described below, are required by the URA.

The URA regulations require the PHA or Project Owner to carry out a relocation assistance advisory program that includes specific services determined to be appropriate to residential or nonresidential displacements. The specific advisory services to be provided, as determined to be appropriate, are outlined at 49 C.F.R. § 24.205(c). For residential displacement under the URA, a personal interview is required for each displaced resident household to determine the relocation needs and preferences of each resident to be displaced. The resident household shall be provided an explanation of the relocation payments and other assistance for which the resident may be eligible, the related eligibility requirements, and the procedures for obtaining such assistance. Advisory counseling must also inform residents of their fair housing rights and be carried out in

⁸⁸ If the resident declines to return to the Covered Project upon completion of the period of temporary relocation, the resident shall be considered to have voluntarily moved out of the property, without the benefit of further relocation assistance. For example, a PHA or Project Owner may have rented a market-rate apartment as a temporary relocation resource for a six-month period. In such a situation, the resident may decline to return to the Covered Project and choose to remain in the market-rate apartment at the expiration of the six-month period, but shall not be eligible for any further relocation assistance and payments (including rent differential payments) under this Notice, the URA or Section 104(d), if applicable, in connection with the resident's decision to remain in the temporary housing and not return to the Covered Project.

a manner that satisfies the requirements of Title VI of the Civil Rights Act of 1964, the Fair Housing Act, and Executive Order 11063 (49 C.F.R. § 24.205(c)(1)). So Such advisory services under the URA may include counseling to ensure that residents affected by the project understand their rights and responsibilities and the assistance available to them (49 C.F.R. § 24.205(c)). In addition, the PHA or Project Owner should inform residents that if they believe they have experienced unlawful discrimination, they may contact HUD at 1-800-669-9777 (Voice) or 1-800-927-9275 (TDD) or at http://www.hud.gov.

6.8. Initiation of Relocation

PHAs and Project Owners may not initiate any involuntary physical relocation until both the RCC is in effect and the applicable RAD Notice of Relocation period has expired (i.e., after either 30 or 90 days' notice as applicable depending on nature of the relocation, as described above). This prohibition applies to all types of RAD transactions, regardless of whether the RAD Notice of Relocation is provided after issuance of a NOIA (for conversions involving acquisition) or following the effective date of the RCC (for all other conversions). PHAs are advised to account for the required 30-day or 90-day written notice periods in their planning process, to ensure that notices which satisfy all applicable requirements are issued prior to taking any action to initiate relocation.

Neither involuntary nor voluntary relocation for the project shall take place prior to the effective date of the RCC, unless moves are authorized under Section 7, below ("Applicability of HCV and Public Housing Requirements") or unless HUD provides explicit approval which will only be provided in extraordinary circumstances. The PHA must wait until the RAD Notice of Relocation period has expired before it may initiate any involuntary relocation. However, a resident may request to move voluntarily, and the PHA may honor a resident's request to move, before the applicable 30-day or 90-day period has elapsed, provided that the PHA may not take any action to encourage or coerce a resident to make such a request. If a resident has elected an alternative housing option, PHAs are advised to ensure that any consent to voluntary permanent relocation does not expire prior to the date of the relocation, as described in Section 6.10.

HUD may use administrative data to identify and investigate projects where relocation may be occurring prior to RCC.

6.9. Records and Documentation; Resident Log

HUD may request from the PHA or Project Owner written records and documentation in order to evidence the PHA's and/or Project Owner's compliance, as applicable, with this Notice and the URA. 90 HUD may request to review some or all of such records in the event of compliance

⁸⁹ For example, under fair housing and civil rights laws, the PHA and Project Owner may be required to inform residents about and provide reasonable accommodations for individuals with disabilities, such as search assistance; take appropriate steps to ensure effective communication with individuals with disabilities, such as through the provision of auxiliary aids and services, such as interpreters and alternate format documents; provide advisory counseling services in accessible locations and in an accessible manner for individuals with disabilities; and take reasonable steps to ensure meaningful access for LEP persons. See Section 4 of this Notice for more information on these requirements.

⁹⁰ Chapter 6 of HUD Handbook 1378 includes guidance on URA recordkeeping requirements.

concerns, in the event a project is identified for additional review based on administrative data, in the event of audits for purposes of monitoring the RAD program as a whole, upon selection of a random sample of projects and/or at other times at HUD's sole discretion. The records shall include resident files for all households relocated in connection with RAD and a resident log as described in this Section.

As part of such written record, the PHA or Project Owner must maintain data sufficient to deliver to HUD a resident log of every household that resides at the Converting Project at the time of the first required resident meeting on the proposed conversion pursuant to Section 1.8 of the RAD Notice (the "First Resident Meeting") and of every household that moves into the Converting Project after the First Resident Meeting and before the conversion of assistance under RAD. If any relocation is required, the log shall track resident status through completion of rehabilitation and construction, including re-occupancy after relocation. The resident log must include, but need not be limited to, the following information:

- Name of head of household
- PHA's resident identification number and/or the last four digits of the head-of-household's Social Security Number
- The head of household's race and ethnicity as reported on the HUD Form 50058 or the HUD Form 50058 MTW (the "Form 50058"). For purposes of the resident log, all references to the Form 50058 shall be to the form most recently prepared at the time of the First Resident Meeting or, for residents who moved in after the First Resident Meeting, the form most prepared at the time of the resident's initial occupancy.
- A Yes/No indication if there is any household member reported as having a disability on the Form 50058.
- A Yes/No indication if there is any household member reported as under the age of 18 on the effective date of action of the Form 50058;
- The household's relevant unit address, unit size and household size at the following times:
 - The time of the First Resident Meeting or the time of a resident's initial occupancy if after the First Resident Meeting
 - The time of the issuance of the CHAP or the time of a resident's initial occupancy if after the issuance of the CHAP
 - Proximate and prior to the PHA or Project Owner having authority to initiate involuntary relocation activities (i.e., at the time of issuance of the RCC unless otherwise approved by HUD upon extraordinary circumstances)
 - o Completion of the relocation process following construction or rehabilitation and with return of all households exercising the right of return
- The household's residence status at the time of issuance of the RCC (e.g., in residence at the Converting Project, transferred to other public housing, moved out, evicted or other with explanation)
- The household's residence status upon completion of re-occupancy (e.g., in residence at the Covered Project/never relocated, in residence at the Covered Project/temporarily relocated and returned, transferred to other public housing, moved out, evicted, permanently relocated or other with explanation)
- The following dates for each resident household, as applicable:
 - Date of the RAD Information Notice

- Date of the GIN
- o Date of the CHAP
- Date of NOIA
- Date of RAD Notice of Relocation
- Date of URA Notice of Relocation Eligibility
- Date of most recent consent to voluntary permanent relocation⁹¹
- o Date of relocation away from the Converting Project or Covered Project
- o Dates of any intermediate relocation moves
- O Date of return to the Covered Project or to the household's post-closing permanent address. 92
- The following information for each resident household, as applicable:
 - The type of move (e.g., the types identified in Section 6.4, above)
 - The form of any temporary relocation housing (e.g., hotel, assisted housing, market-rate housing)
 - o The address and unit size of any temporary relocation housing
 - Whether alternative housing options were offered consistent with Section 6.10, below
 - o Any material terms of any selected alternative housing options
 - o The type and amount of any payments for
 - Moving expenses to residents and to third parties
 - Residents' out-of-pocket expenses
 - Rent differential payments or other payments for temporary or permanent rental assistance, together with the rent and utilities (if applicable) that were the basis for the calculations
 - Any other relocation-related compensation or assistance

6.10. Alternative Housing Options

Under the RAD Notice, "involuntary permanent relocation" is prohibited and each resident must be able to exercise his or her right of return to the Covered Project. A PHA or Project Owner is permitted to offer a resident alternative housing options when a resident is considering his or her future housing plans, provided that at all times prior to the resident's decision, the PHA and Project Owner preserve the resident's ability to exercise his or her right of return to the Covered Project.

A) Requirements for Any Offer of Alternative Housing Options

All residents who are similarly situated must be given the same offer of alternative housing options. If the PHA or Project Owner seeks to limit the number of households that accept the

⁹¹ The most recent consent must be within 180 days of the actual relocation date, as discussed in Section 6.10(D).

⁹² In the case of voluntary permanent relocation, the date of "return" may be the same as the date of relocation away from the Converting Project.

offer of alternative housing options, the PHA or Project Owner shall determine a fair and reasonable method for selection among similarly situated residents.⁹³

In connection with any offer and acceptance of alternative housing options, the PHA or Project Owner must ensure that the residents' decisions are: 1) fully informed; 2) voluntary; and 3) carefully documented. Any alternative housing option must include, at a minimum, all relocation assistance and payments required under this Notice, the URA and Section 104(d), as applicable, and may include other elements. Funds administered by HUD may not be used to pay any monetary elements not required under this Notice, the URA or Section 104(d).

Acceptance of an alternative housing option is considered voluntary permanent relocation and the accompanying RAD relocation assistance and payments for which the resident may be eligible must be administered in accordance with all requirements for an eligible displaced person under the URA and its implementing regulations and, where applicable, Section 104(d) and its implementing regulations.

PHAs may not propose or request that a displaced person waive rights or entitlements to relocation assistance under the URA or Section 104(d). The PHA must provide a written notice of URA or Section 104(d) relocation assistance and payments for which the resident may be eligible so that the resident may make an informed housing choice. The resident must be provided at least thirty (30) days to consider the offer of voluntary permanent relocation and the resident's acceptance of the PHA's offer of voluntary permanent relocation must be in writing signed by the head of the household for that unit.

B) Assisted Housing Options as Alternatives

Alternative housing option packages may include a variety of housing options and PHAs and Project Owners shall take particular care to ensure program compliance with the regulations applicable to the alternative housing options. Examples of alternative housing options may include:

- Transfers to public housing
- Admission to other affordable housing properties subject to the program rules applicable to such properties
- Housing Choice Vouchers (HCVs) subject to standard HCV program administration requirements. PHAs must operate their HCV programs, including any HCVs offered as an alternative housing option, in accordance with their approved policies as documented in their Section 8 Administrative Plan and HUD regulations at 24 C.F.R. part 982. Any offer of an HCV as an alternative housing option must be made consistent with the

⁹³ For example, if the RAD conversion is financed by LIHTC and a few residents would not meet LIHTC program requirements, the PHA and Project Owner may want to offer these household alternative voluntary permanent relocation options. However, they must offer the same alternative housing options to all such households. As a second example, if the PHA and Project Owner seek to create two on-site vacancies of a particular unit size in order to facilitate temporary relocation on-site, the PHA may offer an alternative housing option of a housing choice voucher to <u>all</u> residents of applicably sized units (assuming that to do so is consistent with the PHA's voucher administration policies), and conduct a lottery to select the two households which will receive the vouchers.

PHA's admission preferences and other applicable policies and procedures set forth in the Section 8 Administrative Plan.

- Homeownership programs subject to the applicable program rules
- Other options as may be identified by the PHA and/or Project Owner
 - C) Monetary Elements Associated With Alternative Housing Options

A PHA or a Project Owner may include a monetary element in an alternative housing option package, provided that:

- Any monetary element associated with the alternative housing option shall be completely distinct from and in addition to any required RAD, URA or Section 104(d) relocation payments and benefits for which the resident is eligible ("Required Relocation Payments").
- No funds administered by HUD may be used to pay for any monetary element associated with the alternative housing option other than Required Relocation Payments.
- Any monetary element associated with the alternative housing option other than Required Relocation Payments must be the same amount offered to all similarly situated households.⁹⁴
- Any alternative housing option package must comply fully with the disclosure and agreement provisions of this Notice.
 - D) Disclosure and Agreement to Alternative Housing Options

In providing an offer of alternative housing options to a resident, the PHA or Project Owner must inform the resident in writing of: a) his or her right to return; ⁹⁵ b) his or her right to comment on and/or object to plans which would preclude the resident from returning to the Covered Project; c) the requirement that if the resident objects to such plans, the PHA or Project Owner must alter the project plans to accommodate the resident in the Covered Project; and d) a description of both the housing option(s) and benefits associated with the right of return and the alternative housing options and benefits being offered. In the description of the available housing options and benefits, the PHA or Project Owner shall include a description of any temporary housing options associated exercising the right of return and a description of any permanent alternative housing options as well as a reasonable estimate of the financial implications of all temporary and permanent options on the resident long-term.

⁹⁴ Monetary payments other than Required Relocation Payments are considered "temporary, nonrecurring or sporadic income" pursuant to 24 C.F.R. § 5.609(c)(9) and consequently are excluded from income for purposes of eligibility and assistance calculations under certain HUD programs. Residents should be reminded that monetary payments other than URA relocation payments may be taxable under the Internal Revenue Code, that monetary payments, including required relocation payments, may affect residents' eligibility for other assistance programs and that the resident should seek knowledgeable guidance on these matters, including guidance on the taxation of monetary payments under state law.

⁹⁵ In the case of a transfer of assistance to a new site a significant distance from the Converting Project as described in Section 6.4(E), the resident shall be informed of the resident's right to return to the Covered Project at the new site and of the resident's right to an assisted unit within a reasonable distance of the site of the Converting Project, as described in Section 6.4(E).

The written notification may request written consent from the resident to exercise the alternative housing option and receive permanent relocation assistance and payments pursuant to RAD, the URA and/or Section 104(d), as applicable, in addition to any benefits associated with the alternative housing option. As part of any voluntary consent, the resident head of household must acknowledge in writing that acceptance of such assistance terminates the resident's right to return to the Covered Project. In order to ensure that the resident has sufficient time to seek advice and consider the alternative housing options, any consent to an alternative housing option executed within 30 days of the written presentation of the options shall be invalid.

Any offer of alternative housing options must be made in writing and the acceptance of the alternative must be voluntary and in writing. The offer of an alternative housing option must contain the following elements:

- The resident is informed of his or her right to return to the Covered Project and that neither the PHA nor the Project Owner can compel the resident to relinquish his or her right to return. The offer of alternative housing options must clearly state that acceptance of any alternative would relinquish the resident's right to return to the Covered Project.
- The offer of an alternative housing option must be accompanied by identification of comparable housing units which the resident may use to understand the nature of housing options available to them and the rent and estimated utility costs associated with such housing options. This information must also be accompanied by a reasonable estimate of any replacement housing payment or "gap payment" for which the resident may be eligible.
- The offer of an alternative housing option must be accompanied by information regarding moving payments and assistance that would be available if the resident exercises the right of return and if the resident accepts the alternative housing option.
- Residents must be offered advisory assistance to consider their options.
- To be fully informed, the offer must outline the implications and benefits of each alternative housing option being made available (i.e., of accepting each alternative housing option as compared to exercising his or her right to return) as well as a reasonable estimate of when the resident's relocation might occur. Implications and benefits include payment amounts, differences in rent calculations, differences in program rules, housing location, and potential long-term implications such as household housing expenses multiple years in the future.
- To be fully voluntary, the resident must have at least thirty (30) days following delivery of the written offer to consider their options. LEP persons must be provided a written translation of the offer and oral interpretation of any meetings or counseling in the appropriate language. In addition, PHAs must comply with their obligation to ensure effective communication with persons with disabilities.
- The resident cannot be asked to make a decision which will be implemented at a distant future time. Consequently, the resident may not provide written consent to an alternative housing option (and consequently, consent to voluntary permanent relocation) until after

the earlier of issuance of the NOIA or the effective date of the RCC. ⁹⁶ If a resident signs a written consent to accept an alternative housing option, that written consent is valid for 180 days. If relocation (after the applicable notice periods) has not occurred within this 180 day period, then the PHA or Project Owner must secure a new consent to accept an alternative housing option. New relocation notices are generally not required.

- The acceptance must be in writing signed by the resident head of household, including a certification of facts to document that the household is relinquishing its right to return and that the decision and the acceptance of the alternative housing option was fully informed and voluntary.
- Residents accepting alternative housing options to relinquish their right to return will be considered to have voluntarily and permanently relocated. Such residents are to be provided applicable RAD, URA and/or Section 104(d) relocation assistance and payments.

The information included with the offer of alternative housing options is to aid the resident in making decisions regarding the desirability of the alternative housing options and neither satisfies nor replaces the relocation notices and information required to be provided to residents pursuant to this Notice, the URA or Section 104(d).

While HUD does not require PHAs to submit documentation of alternative housing options offered to residents or the residents' elections, PHAs must keep auditable written records of such consultation and decisions. HUD may request this documentation at any time, including as part of a review of the Checklist or if relocation concerns arise.

6.11. Lump Sum Payments

PHAs and Project Owners should note that certain relocation payments to displaced residential tenants may be subject to 42 USC § 3537c ("Prohibition of Lump-Sum Payments") and must be disbursed in installments. The PHA or Project Owner may determine the frequency of the disbursements which must be made in installments. Handbook 1378, Chapter 3-7(D) provides guidance on the manner and frequency of disbursing payments subject to this requirement.

Any monetary element beyond Required Relocation Payments which may be associated with an alternative housing option described in Section 6.10, above, is not relocation assistance and is therefore not subject to the requirements regarding lump sum payments.

SECTION 7. APPLICABILITY OF HCV AND PUBLIC HOUSING REQUIREMENTS

7.1. HCV Waiting List Administration Unrelated to the RAD Transaction

From time to time, a resident of a Converting Project may place themselves on the PHA's waiting list for HCVs independent of any planned RAD transaction. With respect to residents of a Converting Project prior to the effective date of the HAP contract, PHAs should continue to

⁹⁶ The PHA and Project Owner should note that securing resident consent to an alternative housing option may delay the issuance of the RAD Notice of Relocation. The RAD Notice of Relocation must be specific to whether the resident will be temporarily or permanently relocated.

administer their HCV waiting list in accordance with their Section 8 Administrative Plans. Residents who rise to the top of the HCV waiting list independent of any preference for relocating RAD residents or other RAD provisions and accept an HCV are not considered to be relocated as a result of the RAD conversion. Standard administration of the PHA's HCV waiting list is not considered relocation.

7.2. **HCV Waiting List Administration Related to the RAD Transaction**

From time to time, a PHA may wish to use HCV resources as a relocation option in connection with a RAD transaction. In order to do so, a PHA must modify its Section 8 Administrative Plan to provide a preference for relocating RAD residents and the PHA is subject to Section 6.8 of this Notice relating to initiation of relocation. Further, if a PHA provides a preference for relocating RAD residents, the PHA must be explicit regarding the nature of the HCV as a relocation resource. If the PHA anticipates using the HCV as a temporary relocation resource, the PHA must recognize that it cannot rescind an HCV once issued to the resident (i.e., the family would have to voluntarily relinquish their voucher and may choose to remain in the HCV program indefinitely). The PHA must also provide a preference for admission to the Covered Project in order to satisfy the right to return. Alternatively, if the PHA anticipates using the HCV as a voluntary permanent relocation resources, the PHA must comply with the alternative housing options provisions of Section 6.10.97

7.3. **Public Housing Transfers Unrelated to the RAD Transaction**

From time to time, a resident of a Converting Project may request a transfer to another public housing property independent of any planned RAD transaction. With respect to residents of a Converting Project prior to the effective date of the HAP contract, PHAs must continue to administer their admissions and occupancy procedures as adopted. Any prohibitions in this Notice on implementing relocation do not apply to residents requesting public housing transfers, moves pursuant to the Violence Against Women Act (VAWA)⁹⁸ or reasonable accommodation moves. Standard administration of the PHA's admissions and occupancy policy is not considered relocation.⁹⁹ Transfers not undertaken for the RAD project are not subject to URA. However, it is recommended that the PHA document the transfer carefully, including an acknowledgement by the resident that the transfer is not undertaken for the RAD project, is not

⁹⁷ PHAs and Project Owners should note that while in most cases, there is no rent differential between the tenant paid rent in a public housing unit and in an HCV, there are some situations (such as flat rent households) where a difference does exist. Rental assistance payments under the URA are required if there is a difference between these two amounts.

⁹⁸ Title IV, section 40001-40703.

⁹⁹ Standard administration of the PHA's admissions and occupancy policy is permitted. However, HUD is sensitive to concerns that discussion of the planned RAD conversion and construction activities may cause residents to perceive a pressure to transfer without the counseling and moving assistance which would be available were the household to wait until relocation. If relocation at the Converting Project is planned, PHAs are strongly advised to document any such transfers carefully and to provide any households moving under standard admissions and occupancy policies with additional notices referencing the assistance and payments which would be available if the household were to remain in place until the relocation plan is implemented.

subject to URA requirements and that the resident is moving notwithstanding the guidance in the GIN or other relocation guidance from the PHA.

7.4. Resident Initiated Public Housing Transfers Related to the RAD Transaction

Pursuant to Section 1.8 of the RAD Notice, households in the Converting Project who do not want to transition to the Section 8 program may be offered, if available, the opportunity to move to other public housing owned by the PHA. Such move shall be implemented as a transfer and shall be prioritized equivalent to a "demolition, disposition, revitalization or rehabilitation transfer" as described in Section 11.2 of the applicable Public Housing Occupancy Guidebook. Transfers for this purpose do not require any modification to the PHA's admissions and occupancy policy and may occur at any time pursuant to the PHA's admissions and occupancy policy. Transfers for this purpose, while initiated by the resident, are the result of the PHAinitiated RAD transaction and the PHA must bear the reasonable costs of transfer. The reasonable cost of the transfer includes not just the cost of packing, moving, and unloading, but also the cost of disconnecting and reconnecting any existing resident-paid services such as telephone and cable television. The PHA must also document that the resident's transfer request is fully informed and fully voluntary, which documentation must include an acknowledgement by the resident that the transfer is not undertaken at the request of the PHA or under pressure from the PHA, that the resident is moving notwithstanding the guidance in the GIN or other relocation guidance from the PHA and that the resident is withdrawing from participation in the RAD program and consequently losing rights, including the right to return, which accrue to residents participating in the RAD program. A public housing resident who voluntarily seeks a public housing transfer is generally not considered to be displaced under the URA or Section 104(d), where applicable.

7.5. Public Housing as a Temporary Relocation Resource

PHAs and Project Owners may wish to mitigate the relocation budget associated with the RAD conversion by using units within the PHA's portfolio as relocation resources. In light of its mission to serve as many low-income households as possible, including its need to accommodate emergency transfers (such as moves pursuant to VAWA), the PHA should minimize the use of the public housing units not converting under RAD for temporary relocation of RAD impacted residents. HUD has a strong preference that the PHA use the units within the PHA's Converting Projects as a temporary relocation resource prior to using units in the remainder of the PHA's public housing portfolio. PHAs may elect not to lease units within the Converting Projects or, if necessary, the remainder of its portfolio, for this purpose only to the extent reasonably necessary to facilitate construction or rehabilitation.

Upon the effective date of the HAP contract (usually also the effective date of the RAD conversion), each resident of a Covered Project becomes a participant in the Section 8 program and is no longer part of the public housing program. A PHA may use public housing as a temporary relocation resource if approved by HUD, which approval shall depend on the proposed structure. PHAs wishing to use public housing units as a temporary relocation resource must consult with HUD's Office of Public and Indian Housing (PIH) prior to the formal request for HUD approval. It is unlikely that HUD would approve a request to use public housing units

as a relocation resource for a period exceeding one year after the effective date of the HAP contract.

If HUD grants approval, HUD shall provide alternative requirements regarding PIH Information Center (PIC) documentation of the occupancy of these temporary relocation resources. PHAs must follow any guidance or instructions regarding treatment of the public housing units in HUD's data systems as may be provided from time to time.

PHAs and Project Owners should note that, absent written approval, if a resident seeks to occupy a public housing unit after the effective date of the HAP contract, the resident would need to be readmitted to public housing in a manner consistent with the waitlist and admissions policies and must exit the Section 8 program.

7.6. Terminations (Including Evictions) and End of Participation Unrelated to the RAD Transaction

Public housing program requirements related to continued occupancy and termination, including rules on grievances and related hearings, remain in effect until the effective date of a new PBV or PBRA HAP contract. If a resident is evicted in accordance with applicable state and local law and the eviction is not undertaken for the purpose of evading the obligation to make available RAD relocation and URA payments and other assistance, the resident is generally not entitled to relocation assistance and payments under this Notice or the URA (49 C.F.R. § 24.206). If a resident voluntarily ends his or her participation in the public housing program, in the absence of evidence that the end of participation was induced by the PHA for the purpose of evading the obligation to make available RAD relocation and URA payments and other assistance, the resident is generally not entitled to relocation assistance and payments under this Notice or the URA.

7.7. Right-Sizing

Public housing, PBV and PBRA requirements mandate that, upon the availability of a unit which is appropriate for the household size, the PHA or Project Owner must transfer a household that is under- or over-housed into the unit appropriate to the household's size. However, accommodating all residents pursuant to the right of return has primacy over right-sizing requirements and may, in some cases, require temporarily over-housing households. In such circumstances, the PHA or Project Owner shall subsequently transfer the household to an appropriate size unit when available, as is required by the applicable program regulation. Such actions shall be governed by the applicable program regulation and shall not be considered relocation under this Notice.

Lourdes Castro-Ramirez Principal Deputy Assistant Secretary for Public and Indian Housing

Edward L. Golding Principal Deputy Assistant Secretary for Housing

APPENDIX I: Applicable Legal Authorities

APPENDIX II: Recommended Relocation Plan Contents

APPENDIX I: Applicable Legal Authorities

Part 1

This Appendix to the Notice identifies key legal authorities with respect to fair housing, civil rights, and resident relocation. This Appendix is not exhaustive of applicable legal authorities, which authorities may also include other Federal statutes, regulations and Executive Orders, and civil rights provisions related to other programs (including funding programs) associated with the RAD transaction.

Fair Housing Act (Title VIII of the Civil Rights Act of 1968, as amended)

The Fair Housing Act, 42 U.S.C. § 3601 et seq., and its implementing regulations, 24 C.F.R. part 100, prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, disability, or familial status. The Fair Housing Act applies to for-sale and rental housing, whether the housing is privately or publicly funded, including housing supported by tax credits. Single family homes, condominiums, apartment buildings, time-shares, dormitories, transitional housing, homeless shelters that are used as a residence, student housing, assisted living housing, and other types of housing are all covered by the Fair Housing Act.

Among its substantive provisions, the Fair Housing Act requires "covered multifamily dwellings," designed and constructed for first occupancy after March 13, 1991, to be readily accessible to and usable by persons with disabilities. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas are subject to the Act's design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas are subject to the Act's design and construction requirements. ¹⁰⁰ In addition, the Fair Housing Act requires that housing providers make reasonable accommodations in rules, policies, and services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit, including public and common use areas, and that housing providers permit reasonable modifications of existing premises for persons with disabilities.

The Fair Housing Act also requires HUD to administer HUD programs and activities in a manner that affirmatively furthers fair housing (42 U.S.C. § 3608(e)(5). HUD's affirmatively furthering fair housing ("AFFH") rule in 24 C.F.R. §§ 5.150-5.180 will apply to PHAs (except for qualified PHAs) for the PHA's fiscal year that begins on or after January 1, 2018 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5. The affirmatively furthering fair housing regulations will apply to qualified PHAs, for the PHA's fiscal year that begins on or after January 1, 2019 for which a new 5-year plan is due, as provided in 24 C.F.R. § 903.5. ¹⁰¹

¹⁰⁰ See 42 U.S.C. § 3604(f)(3)(c) and 24 C.F.R. § 100.205.

¹⁰¹ For purposes of the AFFH rule, "[a]ffirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing under the AFFH rule means taking meaningful actions that, taken together, address

Additional detail and discussion of the interplay between the Fair Housing Act, Section 504, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

United States Housing Act of 1937 (1937 Act)

The United States Housing Act of 1937 (1937 Act) (42 U.S.C. § 1437c-1(d)(15)) requires PHAs to submit a 5-year plan and an Annual Plan. Pursuant to HUD regulations, the Annual Plan includes a certification by the PHA that the PHA will affirmatively further fair housing.

Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*) and HUD's implementing regulation (24 C.F.R. part 1) prohibit recipients of Federal financial assistance from discriminating, excluding from participation, or denying benefits to, any person on the basis of race, color, or national origin. In addition, Title VI regulations prohibit HUD recipients of Federal financial assistance from utilizing criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin (24 C.F.R. § 1.4(b)(2)(i)). When determining the site or location of housing, recipients may not make selections with the purpose or effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination on the ground of race, color, or national origin (24 C.F.R. § 1.4(b)(3)). An applicant or recipient of HUD financial assistance also has an obligation to take reasonable action to remove or overcome the consequences of prior discriminatory practices regardless of whether the recipient engaged in discriminatory conduct (24 C.F.R. § 1.4(b)(6)).

Recipients of Federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities for persons who have limited ability to read, speak, or understand English – i.e., individuals who have limited English proficiency (LEP). This includes oral and written communications during relocation and throughout a RAD transaction. Such language assistance may include, but is not limited to, providing written translation of notices regarding the plans for the project and relocation and oral interpretation at meetings. Otherwise, LEP persons may be denied participation in, and the benefit of, the recipients' program or activity. On January 22, 2007, HUD issued "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (LEP Guidance), available at: http://www.lep.gov/guidance/HUD_guidance_Jan07.pdf. 102

significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws." 24 C.F.R. § 5.150. Meaningful actions means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity. See 24 C.F.R. § 5.152.

¹⁰² See also Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, which requires recipients of Federal financial assistance to take reasonable steps to provide meaningful access to

Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973 provides: "No otherwise qualified individual with a disability in the United States ... shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, service or activity receiving Federal financial assistance." ¹⁰³

Among other things, HUD's regulations implementing Section 504 (in 24 C.F.R. part 8) prohibit recipients of Federal financial assistance, in determining the site or location of a facility receiving such assistance, from making site selections the purpose or effect of which would (1) exclude qualified individuals with disabilities from or deny them the benefits of a program or activity, or otherwise subject them to discrimination; or (2) defeat or substantially impair the accomplishment of the objectives of the program or activity with respect to qualified individuals with disabilities.¹⁰⁴ These prohibitions apply to both determining the site of permanent facilities and a site for relocation of residents.

Furthermore, HUD's implementing regulations prohibit discrimination, the denial of benefits, or the exclusion of participation of individuals with disabilities from the programs or activities of recipients of federal financial assistance because a recipient's facilities are inaccessible. Such recipients must provide qualified individuals with disabilities with program access, which may require modification of architectural features of facilities in RAD transactions for individuals with disabilities to have access to the program. Certain architectural specifications apply to facilities that are altered or newly constructed with HUD financial assistance, such as facilities where assistance is transferred and facilities used as temporary or permanent relocation sites for residents of a project undergoing a RAD conversion. If alterations are made to a housing facility, the alterations to dwelling units in the facility are required, to the maximum extent feasible (i.e., if doing so would not impose undue financial and administrative burdens on the operation of the project), to be made readily accessible to and usable by individuals with disabilities. If alterations taken to a development that has 15 or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility (except when it requires removal of structural load-bearing members), or if the facility is newly constructed, then a minimum of 5% of the total dwelling units, or at least one unit in a development, whichever is greater, must be made accessible for persons with mobility impairments. An additional 2% of the units, but not less than one unit, in a development must be accessible for persons with hearing and vision impairments.

In addition, regulations implementing Section 504 require recipients to make reasonable accommodations for persons with disabilities. A reasonable accommodation is a change, adaptation, or modification to a policy, program, service, or workplace which will allow a qualified person with a disability to participate fully in a program, take advantage of a service, or perform a job. Section 504 also includes effective communication requirements, such as

F.R. § 8.4(b)(5).

their programs and activities for LEP persons. E.O. 13166 directs all Federal agencies, including HUD, to issue guidance to help recipients of Federal financial assistance in providing such meaningful access to their programs. ¹⁰³ 29 U.S.C. § 794. HUD's Section 504 regulation that applies to recipients of Federal financial assistance, including PHAs and Project Owners, is located at 24 C.F.R. part 8. ¹⁰⁴ 24 C.F.R. § 8.4(b)(5).

providing interpreters and alternate format documents (e.g., Braille, large print, accessible electronic communications) for persons with disabilities.

Additional detail and discussion of the interplay between Section 504, the Fair Housing Act, and Titles II or III of the Americans with Disabilities Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

Titles II and III of the Americans with Disabilities Act

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in all services, programs, and activities provided or made available by public entities. Title II of the ADA applies to housing developed or operated by state and local governments, which includes a PHA. Title III of the ADA prohibits discrimination on the basis of disability by public accommodations and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. For example, Title III applies to rental offices, sales offices, homeless shelters, hotels and motels, and commercial spaces associated with housing, such as daycare centers, social service offices, and sales and retail establishments. Titles II or III also will generally apply to community spaces and facilities, such as neighborhood networks, to computer centers (including the computers in the centers), and to transportation services and conveyances provided by PHAs and Project Owners.

Additional detail and discussion of the interplay between Titles II and III of the Americans with Disabilities Act, the Fair Housing Act, and Section 504 of the Rehabilitation Act as these authorities relate to accessibility requirements is described in Part 2 of this Appendix.

Section 109

Section 109 of the Housing and Community Development Act of 1974 (HCDA of 1974), Title I, prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex in Community Development Block Grant (CDBG) programs and activities. Section 109 applies to RAD projects that receive CDBG or other assistance under Title I of the HCDA of 1974.

In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 to ensure that individuals are not subjected to discrimination on the basis of race, color, national origin, disability, age, religion, or sex by recipients of CDBG funds. Section 109 charges HUD with enforcing the right of individuals to live in CDBG-funded housing and participate covered programs and activities free from such discrimination. However, this additional statutory authority only applies to programs authorized under Title I of the HCDA of 1974, such as CDBG and programs, such as Section 108 loan guarantees and the Historically Black Colleges and Universities program.

Equal Access to HUD-assisted or HUD-insured Housing

HUD requires its housing programs to be open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status. HUD recipients and subrecipients must comply with 24 C.F.R. § 5.105(a)(2) when determining eligibility for housing assisted with HUD

funds or subject to an FHA-insured mortgage, and when making such housing available. This includes making eligibility determinations and making housing available regardless of actual or perceived sexual orientation, gender identity, or marital status, and prohibiting inquiries about sexual orientation or gender identity for the purpose of making eligibility determinations or making housing available. Applicants are encouraged to become familiar with these requirements, HUD's definitions of sexual orientation and gender identity at 24 C.F.R. § 5.100, clarifications to HUD's definition of family at 24 C.F.R. § 5.403, and other regulatory changes made through HUD's Equal Access Rule, published in the Federal Register at 77 FR 5662 (Feb. 3, 2012).

Section 3: Economic Opportunities for Low- and Very Low-income Persons.

Certain HUD programs require recipients of assistance to comply with Section 3 of the Housing and Urban Development Act of 1968 (Section 3), 12 U.S.C. § 1701u (Economic Opportunities for Low- and Very Low-Income Persons in Connection with Assisted Projects), and the HUD regulations at 24 C.F.R. part 135. The regulations at 24 C.F.R. part 135 implementing Section 3 ensure, to the greatest extent feasible, that training, employment, contracting and other economic opportunities be directed to low- and very low-income persons, especially recipients of government assistance for housing, and to businesses that provide economic opportunities to low-and very low-income persons where proposed project is located. Recipients of funds covered by Section 3 must comply with 24 C.F.R. part 135, particularly subpart B-Economic Opportunities for Section 3 residents and Section 3 Business Concerns, and Subpart E-Reporting and Recordkeeping. HUD encourages recipients to search the national Section 3 Business Registry to find local businesses that prioritize hiring Section 3 residents.

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 USC § 4601 *et seq.* (URA) is a Federal law that establishes minimum standards for programs or projects receiving Federal financial assistance that include the acquisition of real property (real estate) and/or displace persons from their homes, businesses, or farms as a result of acquisition, rehabilitation, or demolition. The URA implementing Federal regulations can be found at 49 C.F.R. part 24. Project-Based Voucher (PBV) and Project-Based Rental Assistance (PBRA) are considered Federal financial assistance for purposes of the URA. As a result, the URA will apply to acquisitions of real property and relocation of persons from real property that occur as a direct result of acquisition, rehabilitation or demolition for a project that involves conversion of assistance to PBV or PBRA programs under RAD.

 $\underline{\text{http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/library/relocation/policyandguidance/handbook 1378.}$

¹⁰⁵ For additional guidance, see HUD Handbook 1378 Tenant Assistance, Relocation, and Real Property Acquisition), available at:

Section 104(d) of the Housing and Community Development Act of 1974

Section 104(d) of the Housing and Community Development Act of 1974, as amended, 42 USC § 5304(d), (Section 104(d)), is a Federal law that applies when a lower-income dwelling is demolished or converted (as conversion is defined in accordance with 24 C.F.R. § 42.305) to a use other than lower-income housing in connection with a Community Development Block Grant Program (CDBG) or HOME Investment Partnerships Program (HOME) funded activity. Under Section 104(d), a lower-income person is considered displaced and, therefore eligible for Section 104(d) relocation assistance if the person permanently moves from real property or permanently moves personal property from real property as a direct result of the demolition or conversion of a lower-income dwelling to a use other than lower-income dwelling unit in connection with a CDBG or HOME funded activity. The Section 104(d) one-for-one replacement housing requirements may apply with respect to occupied and vacant occupiable lower-income dwelling units that are demolished or converted to a use other than lower-income dwelling units in connection with CDBG or HOME funded activity. Section 104(d) implementing regulations can be found at 24 C.F.R. part 42, Subpart C. Additional HUD policy and guidance for Section 104(d) is available in HUD Handbook 1378, Chapter 7.

Part 2 – Accessibility Requirements

Federal accessibility requirements apply to all RAD projects – whether they include new construction, alterations, or existing facilities. Applicable laws include, but are not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, and Titles II or III of the Americans with Disabilities Act (ADA). A PHA or Project Owner must comply with each law that applies to its project and with the requirement that provides the most accessibility when two or more laws apply. All three laws include new construction requirements. Substantial alterations, additions, rehabilitation and existing facilities must be in compliance with applicable requirements of Section 504 and the ADA. All three laws may also require reasonable accommodations or modifications.

Accessibility Requirements for New Construction

The Fair Housing Act requires all "covered multifamily dwellings" designed and constructed for first occupancy after March 13, 1991, to be readily accessible to and usable by persons with disabilities. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas must meet the Fair Housing Act's design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas must meet the Fair Housing Act's design and construction requirements. The Fair Housing Act requires that all covered multifamily dwellings be designed and constructed so that public and common use areas are readily accessible to and usable by persons with disabilities; all doors are sufficiently wide to allow passage by persons using wheelchairs; all units contain accessible routes into and through the dwelling unit; light switches, electrical outlets, thermostats, and other environmental controls are in accessible locations; reinforcements are installed in bathroom walls to allow later installation

¹⁰⁶See 24 C.F.R. § 100.205 (Fair Housing Act) and 24 C.F.R. §§ 8.22 and 8.23 (Section 504). See also 28 C.F.R. § 35.151(b) and 28 C.F.R. part 36 (ADA Titles II and III regulations, respectively).

of grab bars; and kitchens and bathrooms are usable such that a person in a wheelchair can maneuver about the space. ¹⁰⁷ These design and construction requirements apply whether the housing is privately or publicly funded, including housing supported by tax credits. ¹⁰⁸

New construction of a multifamily housing project containing five or more dwelling units is also subject to physical accessibility requirements under Section 504. Under Section 504, a "project" includes all residential and appurtenant structures, equipment, roads, walks, and parking lots which are covered by a single contract or application for Federal financial assistance, or are treated as a whole for processing purposes, whether or not they are located on a single site. The accessibility standards for new construction under Section 504 are the Uniform Federal Accessibility Standards (UFAS). HUD recipients may also use the 2010 ADA Standards for Accessible Design under title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice"). This option exists until HUD formally revises its Section 504 regulation to adopt an updated accessibility standard. Refer to HUD's Deeming Notice for more information.

Section 504 also requires that a minimum of 5% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with mobility impairments. An additional 2% of the total dwelling units or at least one unit, whichever is greater, is required to be accessible for persons with vision and hearing impairments. HUD may prescribe a higher percentage or number of units upon request by any affected recipient or by any State or local government or agency based upon demonstration to the reasonable satisfaction of HUD of a need for a higher percentage or number, based on census data or other available current data, or in response to evidence of a need for a higher percentage or number received in any other manner. In reviewing such request or otherwise assessing the existence of such needs, HUD shall take into account the expected needs of eligible persons with and without disabilities. 112

Title II of the ADA prohibits discrimination on the basis of disability in all services, programs, and activities provided or made available by public entities. Title II of the ADA applies to housing programs, including housing developed or operated by state and local governments, which includes PHAs. Title III of the ADA prohibits discrimination on the basis of disability by public accommodations, including rental offices, and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. All newly constructed or altered facilities, including facilities altered to

¹⁰⁷ See 24 C.F.R. § 100.205.

¹⁰⁸ For more information about the design and construction provisions of the Fair Housing Act, see www.fairhousingfirst.org. See also the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Accessibility (Design and Construction) Requirements for Covered Multifamily Dwellings Under the Fair Housing Act (April 30, 2013), available at: www.hud.gov/offices/fheo/library/hudiointstatement.pdf.

¹⁰⁹ See 24 C.F.R. § 8.3.

¹¹⁰ The UFAS are available at https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/ufas). See also 24 C.F.R. § 8.32.

¹¹¹ See 24 C.F.R. § 8.22.

¹¹² See HUD regulation at 24 C.F.R. § 8.22(c).

comply with program access and readily achievable barrier removal obligations that exist under Titles II or III of the ADA, must comply with the U.S. Department of Justice's ADA architectural accessibility standards as described in the following U.S. Department of Justice Technical Assistance document ADA Requirements, Effective Date/Compliance Date (Feb. 2011), http://www.ada.gov/revised_effective_dates-2010.htm.

Accessibility Requirements for Alterations

If a building was constructed for first occupancy after March 13, 1991, the building must be in compliance with, and all alterations must maintain the building's accessible features so that the building continues to meet, the Fair Housing Act's accessibility requirements. In addition, without regard to the date of construction for first occupancy, certain alterations may be required under the Fair Housing Act if requested by a resident as a reasonable accommodation or modification or otherwise required to remediate accessibility deficiencies in the design and construction of the building.

Under HUD's Section 504 regulation, alterations include any structural change in a facility or a change to its permanent fixtures or equipment. If alterations are undertaken to a project that has fifteen or more units and the cost of the alterations is 75% or more of the replacement cost of the completed facility, this qualifies as "substantial alterations," in which the new construction provisions of 24 C.F.R. § 8.22 apply. 113

When alterations are made that do not qualify as substantial alterations, alterations to dwelling units in a multifamily housing project shall, to the maximum extent feasible, be made to be readily accessible to and usable by individuals with disabilities. ¹¹⁴ If alterations of single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, the entire dwelling unit shall be made accessible. Once 5% of the dwelling units in a housing project are readily accessible to and usable by individuals with mobility impairments, no additional elements of dwelling units or entire dwelling units are required to be accessible under this provision. However, alterations to meet ongoing accessibility needs are always required, for example, in response to a reasonable accommodation request. Alterations to common areas or parts of facilities that affect accessibility of existing housing facilities shall, to the maximum extent feasible, be made to be accessible to and usable by individuals with disabilities. For purposes of this paragraph, the phrase "to the maximum extent feasible" shall not be interpreted as requiring that a recipient (including a PHA) make a dwelling unit, common area, facility or element thereof accessible if doing so would impose undue financial and administrative burdens on the operation of the multifamily housing project. ¹¹⁵

All altered facilities covered by Titles II or III of the ADA must be altered in accordance with the U.S. Department of Justice's 2010 ADA Standards for Accessible Design and applicable ADA

¹¹³ See 24 C.F.R. § 8.23(a). The sole exception is that load bearing structural members are not required to be removed or altered.

¹¹⁴ HUD may require a higher number or percentage of accessible units pursuant to 24 C.F.R. § 8.22(c) and 24 C.F.R. § 8.23(b)(2).

¹¹⁵ 24 C.F.R. § 8.23(b).

regulations, unless subject to certain safe harbors identified in the 2010 ADA revised regulations for Titles II and III, as applicable. 116

HUD will consider on a case-by-case basis a PHA's request to undertake limited new construction on the site of a Covered Project undergoing rehabilitation to comply with accessibility requirements on the site.

Additional Accessibility Requirements for Both New Construction and Alterations

Accessible units must be distributed throughout projects and sites and be available in a sufficient range of sizes and amenities so that a qualified individual with disabilities' choice of living arrangements is, as a whole, comparable to that of other persons eligible under the same program. This provision shall not be construed to require provision of an elevator in any multifamily housing project solely for the purpose of permitting location of accessible units above or below the accessible grade.

PHAs are encouraged to use universal design principles, visitability principles and active design guidelines in planning new construction or retrofit work, wherever feasible. However, adherence to universal design principles does not replace compliance with the accessibility requirements of Section 504, the ADA and the Fair Housing Act.

Program Accessibility Requirements

Under Section 504, recipients must operate each existing housing program or activity receiving Federal financial assistance so that the program or activity, when viewed in its entirety, is accessible to and usable by individuals with disabilities. Title II of the ADA also includes a program access requirement, while Title III of the ADA requires readily achievable barrier removal. Further, Section 504, the Fair Housing Act, and the ADA require that reasonable accommodations/modifications be granted to address disability-related needs of individuals with disabilities. 119

¹¹⁸ See 28 C.F.R. § 35.150; 28 C.F.R. § 36.304.

http://portal.hud.gov/hudportal/documents/huddoc?id=JOINTSTATEMENT.PDF. While this joint statement focuses on the Fair Housing Act, the principles discussed in the statement generally apply to requests for reasonable accommodation under Section 504, except, for purposes of Section 504, HUD recipients are required to provide and pay for structural modifications as a reasonable accommodation.

¹¹⁶ See http://www.ada.gov/regs2010/2010ADAStandards/2010ADAstandards.htm.

¹¹⁷ See 24 C.F.R. §§ 8.26 and 8.27.

¹¹⁹ For more information on reasonable accommodations, see the HUD/DOJ Joint Statement on Reasonable Accommodations Under the Fair Housing Act at

APPENDIX II: Recommended Relocation Plan Contents

While RAD mandates written relocation plans only for projects which involve permanent relocation (including, without limitation, a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than one year, HUD strongly encourages PHAs to document their relocation planning process and procedures in a written relocation plan. The following provides suggested content for required and recommended relocation plans. In the case of any discrepancy between this description of the recommended relocation plan contents and the provisions of the Notice to which this Appendix is attached or any applicable laws or regulations with respect to the URA or Section 104(d), the provisions of the Notice or applicable laws and regulations shall govern.

The basic elements of the relocation plan include:

- A general description of the project and project elements that may create relocation needs:
- Information on residents of the project and eligibility for relocation assistance and payments;
- Information regarding how the project will address the RAD right to return requirements and the project's re-occupancy policies;
- A detailed discussion of plans for temporary relocation assistance;
- A detailed discussion of any transfer of assistance;
- A detailed discussion of any offers of alternative housing options and plans for voluntary permanent relocation assistance;
- A detailed discussion of compliance with fair housing and civil rights requirements, including accessibility requirements;
- The relocation budget; and
- The appeals process.

The plan as a whole should discuss the specific steps to be taken to minimize the adverse impacts of relocation on the residents.

I. Project Summary

The Relocation Plan should provide a general description of the property (e.g., year built, location, number of units, configuration, resident population served). The project summary should also identify the nature of the activities to be undertaken, including acquisition, demolition, rehabilitation, and construction activities and additional detail regarding the project scope (e.g., gut rehab, systems replacement, modest in-unit renovations, transfer of assistance). The project summary should also discuss how any construction activities are to be implemented (i.e., vacate the property entirely, vacate specific floors or buildings, rehabilitation with residents in place). The summary should also discuss the overall theory of relocation, for example, whether a few households will be relocated off-site and the vacant units will be used as temporary housing before other households move back to their original units (a "hoteling" approach), or whether the vacant units will be permanently occupied, with the residents vacating other units to be renovated (a "domino" approach).

The relocation plan should also identify the funding sources which may trigger relocation requirements, with particular attention to the potential presence of HOME or CDBG funds which may trigger Section 104(d) requirements.

II. Project Occupancy

The Relocation Plan should provide information on occupancy of the property including the number of residents, their household type (family, elderly), any non-residential (commercial) occupants, and should identify how any routine needs (such as continuation of utilities such as telephone service) and civil rights compliance issues (for example, limited English proficiency, disabilities, reasonable accommodations and unit modifications that have been or may be necessary) shall be identified and addressed. The Relocation Plan may specify the community meetings, interviews and/or other processes that will be undertaken to assess the residents' needs.

The Relocation Plan should also address eligibility for relocation assistance and payments, applying the rules of the Notice to the particularities of the project.

III. Resident Return and Re-occupancy Policies

The Plan should address how the project will honor the RAD right to return requirements and the "no re-screening upon conversion" policy. With respect to residents who will be temporarily relocated, the Plan should include the methodology that will be used to determine the sequence in which residents will re-occupy units at the project after rehabilitation, demolition, and/or construction is completed, and to determine how residents are matched with units if the residents are not able to return to their original unit. For example, if units will come online in stages, the plan should outline how the PHA or Project Owner will determine when each resident will return to the property.

IV. Temporary Relocation Assistance

The plan should detail the temporary housing resources to be used, the anticipated duration of temporary relocations, notices to be provided and the temporary relocation assistance the PHA or Project Owner will provide for residents (Paragraph 2-7 of HUD Handbook 1378). Topics to be addressed in the Plan include:

- <u>Temporary Housing Resources</u>. The Plan should identify the nature and availability of the temporary housing resources the PHA or Project Owner anticipates using. On-site resources are generally preferred. However, in some cases, PHAs or Project Owners may need to use hotel rooms for short-term relocations, or market-rate apartments. If the PHA or Project Owner anticipates using other assisted housing resources (such as HCVs, public housing or other properties with regulatory restrictions), the PHA or Project Owner should take particular care to address regulatory issues.
- <u>Allocation of Temporary Relocation Resources</u>. The Plan should describe a fair and reasonable methodology for allocating temporary relocation housing to residents on a nondiscriminatory basis.
- <u>Duration of Temporary Relocation</u>. In the event that the Plan includes relocation which is anticipated to exceed one year, it should detail the requirements which apply to those

residents (such as the issuance of a *Notice of Relocation* to the resident covering eligibility for URA relocation assistance, the offer of permanent relocation assistance and payments at URA levels and, if conditions warrant, the subsequent issuance of a *Notice of Eligibility*) as distinct from requirements that apply to residents who are not relocated for more than one year.

- <u>Packing and Moving Assistance</u>. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
 - o Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
 - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
 - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
 - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses. The PHA or Project Owner can choose to do one or more of the following:
 - Undertake the moves itself, using employees of the PHA or Project Owner or "force account labor" 120
 - Use a contractor or moving company
 - Reimburse residents for all actual, reasonable and necessary moving expenses.
- <u>Storage</u>. The Plan should address whether storage of the resident's personal property is necessary and the arrangements for such storage.
- <u>Damage or Loss</u>. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or the replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
- <u>Out-of-Pocket Expenses</u>. The nature of out of pocket expenses vary based on the nature of the temporary relocation moves. For example, hotel stays or in-place renovation may trigger the need for reimbursement of meals while a kitchen is unavailable. The Plan should outline the anticipated out-of-pocket expenses and the PHA's or Project Owner's plans and budget with respect to these expenses.
- <u>Leasing Arrangements</u>. The Plan should address whether the resident will have a direct lease or other contractual relationship with the owner of the temporary relocation resource or whether the PHA or Project Owner will hold the lease and the resident will maintain a contractual relationship with the PHA or Project Owner.
- <u>Utility Costs</u>. The Plan should address whether residents will need to disconnect and reconnect necessary utilities and, if so, how the PHA or Project Owner anticipates managing this process and any associated expenses. Necessary utilities may include telephone, cable service, Internet access or other items. The Plan should address payment of utility deposits, if required at the temporary relocation housing (HUD Handbook 1378, paragraph 2-7(A)(3)).

¹²⁰ Defined at 24 C.F.R. 905.108.

• Reasonable Accommodations. The plan should address whether residents with disabilities will require reasonable accommodations during temporary relocation and, if so, how the PHA or Project Owner anticipates ensuring the provision of reasonable accommodations and any associated expenses. Reasonable accommodations may include, among other items, the provision of transportation assistance, relocation to locations which are physically accessible and located near public transportation, and modifications to policies to allow individuals with disabilities to reside with a live-in aide.

V. Transfer of Assistance

Relocation planning in the context of transfer of assistance is particularly complex. The PHA should address how RAD, URA and Section 104(d) requirements each apply, as the same activity may be treated differently under each regulatory framework. The Plan should specifically outline the PHA's procedures to ensure that the applicable requirements are applied to each situation appropriately. The Plan should also address whether relocation is required for any businesses or residents at the destination site. Finally, the Plan should address whether two moves – from the public housing site to an intermediate site and then to the transfer of assistance site – are necessary while the Covered Project is being constructed or rehabilitated.

VI. Alternative Housing Options and Voluntary Permanent Relocation Assistance

If the PHA or Project Owner seeks to offer alternative housing options, the Plan should identify those options and the manner in which they are presented to residents for decision. The plan should also outline the counseling the PHA or Project Owner will provide to assist the residents in determining what options may be available and the financial implications of those options, for example,

- 1. Discussion of whether units available in the market (either in the affordable market or the unrestricted market) will meet the financial and dwelling requirements of relocated residents;
- 2. The general area or location of unit(s);
- 3. Where applicable, the accessibility of such units for individuals with disabilities;
- 4. Criteria for receiving relocation assistance; and
 - 5. Any other information that might benefit residents in their consideration of housing choices.

The Plan should identify how the PHA or Project Owner will work with any residents who have elected voluntary permanent relocation. The Plan should further include a description of the permanent relocation assistance the PHA or Project Owner will provide to such residents. Topics to be addressed in the Plan include:

• Replacement Housing. The Plan should address the availability of comparable replacement housing, the notices to be provided and the provisions to ensure that appropriate accessibility features are available in compliance with applicable laws and regulations.

- <u>Fair housing considerations</u>. The Plan should address referrals to housing not located in areas of minority concentration and compliance with requirements regarding accessible housing for persons with disabilities. The Plan should address how the PHA or Project Owner will determine if residents have paid for the acquisition and/or installation of accessible features in the housing from which they are being relocated and how the PHA or Project Owner will ensure that the replacement housing contains required and comparable accessible features or that the resident is appropriately compensated for the cost of acquiring and/or installing required and comparable accessible features.
- Packing and Moving Assistance. The Plan should address how the PHA or Project Owner intends to provide or reimburse for packing and moving services and expenses. Considerations the Plan may want to address include:
 - o Instructions and supplies (e.g., boxes, markers, tape) to be provided if residents prefer to pack their own personal possessions and items of value;
 - Assistance in packing to be provided if residents need assistance or prefer not to pack their personal possessions;
 - Guidance on how residents request to pack their own possessions or to receive packing assistance; and
 - How the PHA or Project Owner intends to provide or reimburse for moving services and expenses consistent with 49 C.F.R. § 24.301 or, at the resident's option, 49 C.F.R. § 24.302.
- Storage. The Plan should address whether storage of the resident's personal property is necessary and the arrangements for such storage. See 49 C.F.R. § 24.301(g)(4).
- <u>Damage or Loss</u>. The Plan should address Insurance for the replacement value of the property in connection with the move and necessary storage and/or the replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
- <u>Dislocation Allowance</u>. The Plan should address when the resident is entitled to a dislocation allowance and the amount of such dislocation allowance, consistent with the URA Fixed Residential Moving Cost Schedule available at:

 www.fhwa.dot.gov/real_estate/uniform_act/relocation/moving_cost_schedule.cfm.
- <u>Appliances</u>. The Plan should address disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property.
- <u>Security Deposits and Utility Costs</u>. The Plan should address how the PHA or Project Owner anticipates managing transfer of utility arrangements, security deposits and any associated expenses. Utilities may include telephone, cable service, Internet access or other items that may have been in place in the resident's original home. See 49 C.F.R. § 24.301(h)(12).
- Replacement Housing Payment. The Plan should address the circumstances in which displaced residents may be entitled to a replacement housing payment (RHP) to cover the

increase, if any, in monthly housing costs for a 42-month period pursuant to URA requirements or a 60-month period pursuant to Section 104(d). 121

VII. Relocation Budget

Based on the results of the planning process, the PHA or Project Owner should create a relocation budget that includes the following six components:

- 1) The cost of administering the plan and providing assistance and counseling.
- 2) Reasonable moving expenses for a person with disabilities, which may include the cost of moving assistive equipment that is the personal property of the residents, the furnishings and personal belonging of a live-in aide, and/or other reasonable accommodations (HUD Handbook 1378, Paragraph 3-2).
- 3) The cost of the physical move of the residents' belongings. (It is suggested that the move costs be broken down by average cost per move type multiplied by the number of moves.) This physical move cost total should be based on the move scenarios anticipated or projected by the resident survey. The move costs should consider:

For temporary relocation moves:

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

For permanent moves:

- Number and cost of one-time moves into another unit in the same building/complex.
- Number and cost of one permanent move to a unit not within the same building/complex
- Any required dislocation allowance
- 4) The estimated cost of projected increases in monthly housing costs and other expenses for temporary relocation (if applicable).
- 5) The estimated cost of projected replacement housing payments (RHP) (42-month period for URA or 60-month period if Section 104(d) applies).
- 6) Contingency costs estimated for carrying out the relocation process necessary to complete the proposed project.

¹²¹ See also, CPD Notice 2014-09 "Effective Date of Moving Ahead for Progress in the 21st Century Act (MAP-21) Changes to Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA) Payment Limits and Replacement Housing Payment Eligibility Criteria."

VIII. Written and Oral Communications with Individuals with Disabilities and LEP Persons and Use of Accessible Meeting Locations

The Plan should identify how the PHA or Project Owner will take appropriate steps to ensure effective communication with residents and other individuals with disabilities involved in the relocation, such as through the provision of sign language and other interpreters and large print, Braille, accessible electronic, and other alternate format written communications. The Plan should identify the measures to be taken to ensure the most integrated meeting settings appropriate to individuals with disabilities. The Plan should identify how the PHA or Project Owner will ensure meaningful access for LEP persons, such as through written materials and oral communications provided in languages other than English.

IX. Appeal Process

The Plan should specify the procedures to be followed if a resident disagrees with the PHA's or Project Owner's decision as to the resident's eligibility to receive relocation assistance, the amount of a relocation payment, or the adequacy of a comparable replacement dwelling offered to a resident. These procedures should include the process for filing a written appeal to the displacing agency and the specific appeal procedures to be followed consistent with 49 C.F.R. 24.10 (and 24 C.F.R. § 42.390 if Section 104(d) is involved).

X. Certification

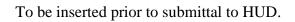
The Plan should contain a certification of compliance with this Notice (or H 2014-09/PIH 2014-17, if applicable), the URA, fair housing and civil rights requirements and, if applicable, Section 104(d).

Technical Assistance

For detailed technical assistance regarding the contents or provisions of a written relocation plan, the PHA or Project Owner should direct questions to their RAD Transaction Manager or email rad@hud.gov.



Attachment V: Lobbying Disclosures



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 Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2023), 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 MTW 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 MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW 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 MTW 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 (or successor form as required by HUD).
- (4) The MTW 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.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C–1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (10) The MTW 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.
- (11) The MTW 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 75.

- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW 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.
- (14) The MTW 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.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW 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 MTW 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.
- (17) With respect to public housing and applicable local, non-traditional development the MTW 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.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW 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.
- (23) 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 MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of the City of Reno	NV001
MTW PHA NAME	MTW PHA NUMBER/HA CODE
	erjury that the information provided above is true and correct. se claim or makes a false statement is subject to criminal and/or civil
1010, 1012; 31 U.S.C. §3729, 3802).	s, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001,
1010, 1012; 31 U.S.C. §3729, 3802).	s, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001,

HOUSING AUTHORITY OF THE CITY OF RENO RESOLUTION 23-03-03 RH

A RESOLUTION APPROVING THE CONTENT AND SUBMISSION OF THE AUTHORITY'S FY 2024 MOVING TO WORK ANNUAL PLAN AND CERTIFICATIONS OF COMPLIANCE TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, Moving to Work (MTW) is a demonstration program, established by Congress in 1996, that offers a limited number of "high performing" Public Housing Authorities the opportunity to propose and test innovative, locally-designed approaches to administering housing programs and self-sufficiency strategies; and

WHEREAS, after a national competition was held in 2012, the Housing Authority of the City of Reno was selected and designated as one of four new MTW agencies in 2013; and

WHEREAS, the Authority's MTW agreement was signed by Sandra B. Henriquez, Assistant Secretary of the U.S. Department of Housing and Urban Development (HUD) on June 27, 2013; and

WHEREAS, on June 28, 2016, the Board of Commissioners approved an extension to the Authority's agreement with HUD to participate in the MTW Demonstration Program through the end of the Authority's Fiscal Year (FY) 2028; and

WHEREAS, in compliance with the Authority's MTW agreement, HUD requires an annual submission of a MTW Plan and Certifications of Compliance following a public process; and

WHEREAS, the Authority developed the FY 2024 MTW Annual Plan and invited public comment beginning on January 27, 2023 allowing for a 30-day comment period; and

WHEREAS, comments were solicited through notices posted on the Authority's website, and through legal notice publications in the *Reno Gazette-Journal* on January 27, 2023 and February 3, 2023; and

WHEREAS, a public hearing was held on March 2, 2023 to receive comments on the Authority's plan which was attended only by staff;

NOW, THEREFORE, BE IT HEREBY RESOLVED by the Board of Commissioners of the Housing Authority of the City of Reno as follows:

- That the Board of Commissioners hereby authorizes and directs the Executive Director to submit the Authority's FY 2024 Moving to Work Annual Plan and Certifications of Compliance to HUD.
- 2. This Resolution is to be effective upon the date of its adoption.

ADOPTED THIS _	DAY OF	March , 20)23.	
			ATTEST	
CHAIRPERSON			SECRETARY	

AGENDA ITEM NUMBER: 8 March 28, 2023

SUBJECT: Discussion on the status, funding, and related matters for proposed RHA housing development projects including, but not limited to:

- a. Dick Scott Manor
- b. Hawk View Apartments
- c. Silverada Manor
- d. John McGraw/Silver Sage Court
- e. Stead Manor
- f. Essex Manor
- g. 419 10th Street
- h. Carville Court
- i. Paradise Plaza

FROM: Executive Director RECOMMENDATION: Discussion

Staff has prepared a presentation for the meeting on this item.

AGENDA ITEM NUMBER: 9 March 28, 2023

SUBJECT: Possible adoption of Resolution 23-03-04 committing \$800,000 in RHA HUD held reserves for MTW Activity #2022-01 and \$350,000 in Washoe County

ARPA grant funds for the rehabilitation of Paradise Plaza to serve as a

workforce development hub. (For Possible Action)

FROM: Executive Director RECOMMENDATION: For Possible Action

Background:

On August 1, 2022, the Reno Housing Authority (RHA) submitted a proposal to CIRE Equity in response to a request for proposal regarding donation of a 13,000 SF property and existing building located within Paradise Plaza in Sparks, Nevada. In December of 2022 staff received notification that CIRE Equity has awarded the vacant Paradise Plaza property to the RHA to create a resident services hub.

Staff is currently working with CIRE Equity and legal to discuss basic terms in preparation of official transfer of ownership of the property. The donation agreement is estimated to be complete by May 15, 2023. Staff plans to bring the contract to the Board for approval in May.

In preparation of ownership transfer, staff is requesting approval to proceed with committing \$800,000 in RHA HUD held reserves for MTW Activity #2022-01 to assist with construction costs and to proceed with a grant application to Washoe County to utilize \$350,000 in American Rescue Plan Act (ARPA) funds guaranteed from the previous sale of property located on 4th street to Washoe County. All funds will be used toward construction costs associated to the renovation of the Paradise Plaza resident services hub.

HOUSING AUTHORITY OF THE CITY OF RENO RESOLUTION 23-03-04 RH

A RESOLUTION APPROVING THE COMMITMENT OF THE HOUSING AUTHORITY
OF THE CITY OF RENO'S ('THE AUTHORITY') HUD FUNDS FOR THE
AUTHORITY'S MOVING TO WORK ("MTW") ACTIVITY #2022-01 REGARDING THE
WORKFORCE DEVELOPMENT PROGRAM RELATED TO THE REHABILITATION OF
PARADISE PLAZA TO SERVE AS A WORKFORCE DEVELOPMENT HUB

WHEREAS, the Authority previously approved a commitment of its HUD funds for its MTW Activity #2022-01 regarding the Workforce Development Program. This approval consists of committing \$800,000 in RHA HUD funds for MTW Activity #2022-01 and \$350,000 in Washoe County America Rescue Plan Act (ARPA) funds for the rehabilitation of Paradise Plaza to serve as a workforce development hub.

WHEREAS, HUD has approved the Authority's MTW Annual Plan which includes MTW Activity #2022-01 regarding the Workforce Development Program. This approval consists of committing \$800,000 in RHA HUD funds for MTW Activity #2022-01 and \$350,000 in Washoe County America Rescue Plan Act (ARPA) funds for the rehabilitation of Paradise Plaza to serve as a workforce development hub.

WHEREAS, in order to evidence a formal commitment of HUD funds by the Authority for approved MTW activities, the Authority resolves as set forth below.

NOW, THEREFORE, BE IT HEREBY RESOLVED by the Board of Commissioners of the Housing Authority of the City of Reno as follows:

- 1. That the Board of Commissioners hereby approves the Authority's commitment of its HUD funds for its MTW Activity #2022-01 regarding the Workforce Development Program. The approval consists of committing \$800,000 in RHA HUD held reserves for MTW Activity #2022-01 and \$350,000 in Washoe County America Rescue Plan Act (ARPA) funds for the rehabilitation of Paradise Plaza to serve as a workforce development hub.
- 2. This Resolution is to be effective upon the date of its adoption.

 ADOPTED THIS <u>28th</u> DAY OF <u>March</u>, 2023.

 ATTEST

 CHAIRMAN

 SECRETARY

AGENDA ITEM NUMBER: 10 March 28, 2023

SUBJECT: Possible adoption of Resolution 23-03-05 committing \$1,395,201 in RHA HUD

held reserves for MTW Activity #2022-01 for a total commitment of \$3,039,201 for workforce development related activities and staffing through the expiration

of the current MTW contract in 2028. (For Possible Action)

FROM: Executive Director RECOMMENDATION: For Possible Action

Background

Under current HUD provided guidance to MTW agencies, PHA's utilizing MTW funding flexibility (MTW Block Grant) must provide proof of the commitment of funds when MTW approved activities have a fiscal impact on the PHA. RHA secured these funding commitments from the Board in June 2022 for all current MTW activities, including MTW Activity #2022-01.

MTW Activity #2022-01, which was approved by the Board and HUD with RHA's FY 2022 MTW Annual Plan, allowed RHA to restructure the Family Self Sufficiency (FSS) program into our current Workforce Development (WFD) Program. This restructuring has allowed RHA to expand services geared toward promoting self-sufficiency to more adults within the household as well as to RHA youth. To date, this activity has been proved to be a success with increased participation in the program and our first graduating class of Start Smart youth coming in the next few months.

In June of 2022, the Board committed \$1,644,000 in MTW Block Grant funds to support Workforce Development activities through the end of RHA's current MTW Agreement, which expires in June of 2028.

As the WFD program has expanded and with one of the Board's goals being to continue expansion of Resident Services, staff is requesting an additional commitment of funds to support this expansion. The current funding commitment does not include RHA scholarships, Start Smart programing expenses and other funding needs to ensure quality programming under the Workforce Development Program.

Staff is requesting an additional commitment of MTW Block Grant funds to be committed to MTW Activity #2022-01 in the amount of \$1,395,201 for a total commitment of \$3,039,201 to the activity through the expiration of RHA's current MTW Agreement in June 2028.

Staff Recommendation: To commit an additional \$1,395,201 of MTW Block Grant funds to support MTW Activity #2022-01 for a total commitment of \$3,039,201 through the expiration of RHA's current MTW Agreement which will occur in June of 2028.

HOUSING AUTHORITY OF THE CITY OF RENO RESOLUTION 23-03-05 RH

A RESOLUTION APPROVING THE COMMITMENT OF THE HOUSING AUTHORITY
OF THE CITY OF RENO'S ('THE AUTHORITY') HUD FUNDS FOR THE
AUTHORITY'S MOVING TO WORK ("MTW") ACTIVITY #2022-01 REGARDING THE
WORKFORCE DEVELOPMENT PROGRAM

WHEREAS, the Authority previously approved a commitment of its HUD funds for its MTW Activity #2022-01 regarding the Workforce Development Program in the amount of \$1,644,000. This approval consists of an additional commitment of RHA HUD funds in the amount of \$1,395,201 for a total commitment of \$3,039,201 for MTW Activity #2022-01 for workforce development program related expenses through the expiration of the current MTW contract June 30, 2028.

WHEREAS, HUD has also approved the Authority's Annual MTW Plan which contains MTW Activity #2022-01 regarding the Workforce Development Program. This approval consists of an additional commitment of RHA HUD funds in the amount of \$1,395,201 for a total commitment of \$3,039,201 for MTW Activity #2022-01 regarding the Workforce Development Program for workforce development program related expenses through the expiration of the current MTW contract June 30, 2028.

WHEREAS, in order to evidence a formal commitment of HUD funds by the Authority for approved MTW activities, the Authority resolves as set forth below.

NOW, THEREFORE, BE IT HEREBY RESOLVED by the Board of Commissioners of the Housing Authority of the City of Reno as follows:

- That the Board of Commissioners hereby approves the Authority's commitment of its HUD funds for its MTW Activity #2022-01 regarding the Workforce Development Program. This approval consists of an additional commitment of RHA HUD funds in the amount of \$1,395,201 for a total commitment of \$3,039,201 regarding MTW Activity #2022-01 for workforce development related expenses through the expiration of the current MTW contract June 30, 2028.
- 2. This Resolution is to be effective upon the date of its adoption.

ADOPTED THIS <u>28th</u> D	Y OF <u>March</u> , 2023.	
	ATTEST	
CHAIRMAN	SECRETARY	

AGENDA ITEM NUMBER: 11 March 28, 2023

SUBJECT: Possible adoption of Resolution 23-03-06 committing \$4,650,000 in RHA HUD

held reserves for MTW Activity #2021-01 for the redevelopment of Carville

Court Apartments. (For Possible Action)

FROM: Executive Director RECOMMENDATION: For Possible Action

Background:

Under current HUD provided guidance to MTW agencies, PHA's utilizing MTW funding flexibility (MTW Block Grant) must provide proof of the commitment of funds when MTW approved activities have a fiscal impact on the PHA. Additionally, as previously discussed, RHA applied for up to \$336,000 in funding through the Washoe County HOME Consortium (WCHC) to support the multiyear salary and benefits for a Service Navigator at Carville Court. The WCHC Technical Review Committee (TRC) is supportive of RHA's application and will vote at its upcoming April 14, 2023, meeting on funding recommendations. However, to secure the requested funding recommendation, the WCHC requires RHA to submit evidence of the Board's commitment to fund the redevelopment of the property.

The redevelopment of Carville Court entails the demolition of six existing units in three duplexes and new construction of 11 units and common space for a transitional housing development. Two of the current units are not inhabitable due to structural issues. The other units are occupied, and existing tenants would be relocated as part of the project. Based on discussions with community partners and staff research, there is a need for next-step, transitional housing within our community. Carville Court fills a void in the current housing market for service enhanced, transitional housing and provides an opportunity to add five (5) additional long-term affordable housing units, with services, targeted to the most economically vulnerable population into our community.

A preliminary pro forma is attached for reference. Based on these estimates, the total project cost is estimated at \$4,650,000.00.

Staff Recommendation: To commit \$4,650,000 in RHA HUD held reserves for MTW Activity #2021-01 for the redevelopment of Carville Court Apartments.

Carville Court Redevelopment

Reno, NV

FOR DISCUSSION PURPOSES ONLY TABLE OF CONTENTS

12-Unit Rental Development

Development Budget	1
Development Budget Notes	2
Operating Income Assumptions	3
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leno, NV ources lermanent Mortgage LHA Funds ity Funds HTF Funds	Amount - 4,649,491 -	<u>Rate</u> 4.50% 0.00%	<u>Amort</u>		Uses		Page
ermanent Mortgage tHA Funds city Funds	4,649,491	4.50%	<u>Amort</u>		Hann		
HA Funds ity Funds	4,649,491	4.50%	<u>Amort</u>		Uses		
HA Funds ity Funds	4,649,491						
ity Funds	, , -	0.00%	30	Acquisition	Land	-	-
•	-	0.0070	-				
UITE Eurodo		0.00%	-	Hard Costs	Site Work	605,000	3,933,889
ITTF Funds	-	3.00%	40		Residential Construction	2,676,763	
dditional Gap \$/GP Bridge Loan	-	3.00%	30		General Requirements	196,906	
imited Partner Equity	-	\$0.93			Contractor Overhead	-	
	-	\$0.93			Contractor Profit	180,497	
HLB AHP	-	3.00%	30		ALTA survey & Insurance	65,635	
ef. Dev. Fee	0	3.00%	15		Common Area FF&E (owner)	45,000	
					Hard Cost Contingency	164,088	
otal Sources	4,649,491						
					Architectural & Engineering	200,000	422,457
otal Uses	4,649,491			Soft Costs	Environmental/Soil/Survey/Stud	9,000	
					Testing and Inspection	-	
					Permit and Impact Fees	115,340	
theck	-				RE Taxes during construct.	-	
					CoC Insurance	50,000	
					Appraisal/Third Party Reports	5,000	
					Title & Recording	5,000	
					Developer Legal	10,000	
					Marketing/Lease-Up	3,000	
					P&P Bond	· -	
					Accounting & Audit	5,000	
					Bank Addtnl Interest Reserve	-	
					Construction Loan Fees	-	
					Construction Period Interest	-	
ncome/Expense Ratio (yr. 0)	1.089				Development Consultant	-	
ncome/Expense Ratio (yr. 15)	1.088				NHD Fee	_	
ev. Fee Def.	0.0%				Construction Management	_	
aid Fee	217,817				Soft Cost Contingency	20,117	
					DSC Reserve	-	293,145
					Operating Reserve	75,328	
				Fees/Reserves	Developer Fee	217,817	
					Total	4,649,491	
							4,649,491

Reno. NV							Page 2
,	units		Notes				raye z
	Uses		110100	8.09	%		
Acquisition	Land	0		acres	#DIV/0! p	er acre	\$0
							per unit
Hard Costs	Site Work	605,000		estimate			
	Residential Construction	2,676,763	•	estimate		6,776 NSF res	
	General Requirements	196,906	6.0%	of hard cost	includes permits	39,000 total GS	F
	Contractor Overhead	0	0.0%	of hard cost	includes permits	82.6% grossing	factor
	Contractor Profit	180,497	5.5%	of hard cost	includes permits		
	ALTA survey & Insurance	65,635		estimate for	builders risk		
	Common Area FF&E (owner)	45,000	\$0	included abo	ove		
	Hard Cost Contingency	164,088	5.00%	of hard cost	3,724,801	310,400 per unit continge	•
Soft Costs	Architectural & Engineering	200,000	5.37%	of hard cost			
	Environmental/Soil/Survey/Stu	9,000	estimate	includes Pha	ase Ones		
	Testing and Inspection	0	estimate				
	Permit and Impact Fees	115,340	\$9,612	per unit (peri	mit, water, sewer, road,	parks)	
	RE Taxes during construct.	0					
	CoC Insurance	50,000	estimate	General Liab	pility		
	Appraisal/Third Party Reports	5,000	estimate		•		
	Title & Recording	5,000	estimate				
	Developer Legal	10,000	estimate				
	Marketing/Lease-Up	3.000	\$8.301	in operating	deficits during lease-up	+ marketing	
	P&P Bond	0			ral Requirements	3	
	Accounting & Audit	5,000	estimate		•		
	Bank Addtnl Interest Reserve	0	1.00%	of permanen	it loan amount + \$15K e	xpenses	
	Construction Loan Fees	0	0.75%	of loan amou	unt + \$50000 est. expe	50,360	
	Construction Period Interest	0	3.250%		See cash flow page	1,866	
	Development Consultant	0	contract pl	us reimbursal	, ,	,	
	NHD Fee	0					
	Construction Management	0				940,000	
	Soft Cost Contingency	20,117	5.0%	of soft costs			
		_					
Fees/Reserves		0	_		-		
	Operating Reserve	75,328			enses, reserves & debt s		75,243
	Developer Fee	217,817	5.00%	total develop	ment cost less fee, rese	erves, & cons	435,635
	Total	4,649,491					

Carville Court Redevelopment

FOR DISCUSSION PURPOSES

Operating Income Assumptions
Page 3

Reno, NV					Allowable	Loop	Adj. Allowable	Actual				
	Rent Level				Monthly	Less Utility	Monthly	/Ionthly Tenar	Monthly	Total Monthly	Monthly	Yearly
Limit Mis		Limita	0/ 11=:4=	D CF	,	•	,	•	,	,	,	•
Unit Mix	<u>%AMI</u>	<u>Units</u>	% Units	Res. SF	Rent	Allowance *	Rent	Rent	Subsidy***	Rent	Revenues	Revenues
0 Bedrooi	m											
<	30% AMI (PBV)	2	16.67%	498	\$490	\$0	\$490	\$490	\$571	\$1,060	\$2,120	\$25,440
<	40% AMI (PBV)	2	16.67%	498	\$654	\$0	\$654	\$654	\$406	\$1,060	\$2,120	\$25,440
<	50% AMI	0	0.00%	498	\$817	\$0	\$817	\$817	\$0	\$817	\$0	\$0
<	60% AMI	0	0.0%	498	\$981	\$0	\$981	\$981	\$0	\$981	\$0	\$0
1 Bedrooi	m											
<	30% AMI (PBV)	4	33.3%	598	\$525	\$0	\$525	\$525	\$731	\$1,256	\$5,024	\$60,288
<	40% AMI (PBV)	4	33.3%	598	\$700	\$0	\$700	\$700	\$556	\$1,256	\$5,024	\$60,288
<	50% AMI (PBV)	0	0.0%	598	\$876	\$0	\$876	\$876	\$380	\$1,256	\$0	\$0
	50% AMI	0	0.0%	598	\$1,051	\$0	\$1,051	\$1,051	\$0	\$1,051	\$0	\$0
2 Bedrooi	m											
<	30% AMI	0	0.0%	800	\$631	\$0	\$631	\$631	\$0	\$631	\$0	\$0
<	40% AMI	0	0.0%	800	\$841	\$0	\$841	\$841	\$0	\$841	\$0	\$0
<	50% AMI	0	0.0%	800	\$1,051	\$0	\$1,051	\$1,051	\$0	\$1,051	\$0	\$0
<	60% AMI	0	0.0%	800	\$1,262	\$0	\$1,262	\$1,262	\$0	\$1,262	\$0	\$0
Manager's	s Unit (2-bd)	0	0.0%	800	\$1,075	\$0	\$1,075	\$0	\$0	\$0	\$0	\$0
Total		12		6,776	_					-	14,288	171,456
		Avg. Per Unit		565						l	0.000/	Φ0
										Laundry @	0.00%	\$0

^{*} RHA EES UA as of 2020 (\$57 - 1 bd, \$67 - 2 bd & 3 bd, \$82 - 4 bd)

All units at 50% AMI for income targeting; some units have deeper rent targeting.

	<u>#</u>	<u>%</u>
LIHTC Units	12	100.00%
Unrestricted Units	0	0.00%

HUD 2022 Income Li	imits (Reno, NV MS	A) - MTSP					
	1 person .	5 persons	2 persons	3 persons	4 persons	4.5 persons	5 persons
30% AMI	19,620	21,030	22,440	25,230	28,020	19,200	30,270
40% AMI	26,160	28,040	29,920	33,640	37,360	25,600	40,360
50% AMI	32,700	35,050	37,400	42,050	46,700	32,000	50,450
60% AMI	39,240	42,060	44,880	50,460	56,040	38,400	60,540

HUD 2023 Fair Market Rents (FMR) and Payment Standard (RHA 1/1/23)								
<u>0 bedroom 1 bedroom 2 bedroom 3 bedroom 4 bedroom</u>								
FMR Rent	1,060	1,256	1,585	2,253	2,700			
Payment Standard	1,060	1,256	1,585	2,253	2,700			

Laundry @	0.00%	\$0
Other Income @	0.50%	\$857
Total Income		\$172,313

Unit Mix		
	#	%
Studio	4	33%
1-bedroom	8	67%
2-bedroom	-	0%
Total	12	33%

Rent Targeting					
#	: %)	Weighted Avo		
<30% AMI	6	50%	15.00%		
<40% AMI	6	50%	20.00%		
<50% AMI	0	0%	0.00%		
<60% AMI	0	0%	0.00%		
Total	12	100%	35.00%		

Carville Court Redevelopment

Operating Expenses

Reno, NV

Expenses

	Administration Marketing Office Supplies Legal Audit Telephone Training and Dues NHD Fees Other TOTAL ADMIN. EXPEN	191 284 1,200 2,500 500 700 0 500 5,875	\$45 per HMN unit FFE and equip contract	Payroll Manager (.25 FTE) Resident Services (PT) PT Site Caretaker PT Housekeeper Regional Maint. Salaries Employers Payroll Tax Workman's Comp. Employee Benefits Employee Apt. Rent Commission and Bonuses	15,683 0 14,027 0 0 0	included in salary included in salary included in salary
pupm	<u>Utilities</u>			TOTAL PAYROLL EXPEN	29,710	
	Electric Natural Gas Water Sewer Cable TV TOTAL UTILITIES Operating and Maintenance Elevator Maintenance Extermination Rubbish Removal Security Grounds/Parking Maint. Repairs Materials	15,000 2,100 4,500 20,000 2,750 44,350 0 12,000 11,880 1,200 1,200 3,450	0.38 per GSF 0.05 per GSF 0.12 per GSF 0.51 per GSF 0.07 per unit/month	Taxes and Insurance Real Estate Taxes Misc. Taxes, Fees & Perm Property & Liab. Ins. Misc. Insurance Other TOTAL TAXES & INS. Prop. Mgmt. and LIHTC Mgmt. Property Mngmt Fee Bookkeeping Fee Investor Mgmt. Fee Compliance Review Fee	0 500 20,000 0 20,500 Fees 9,822 0 0 0 0 9,822	- per non-LIHTC unit 6% of EGI
	Repairs Contract Snow Removal HVAC Maintenance Turnover Costs Misc. Oper. & Maint. Other Supplies TOTAL OPER. & MAINT	2,500 500 1,900 1,500 500 0 36,630		TOTAL OPER. EXPENSE Operating Expenses + Replace	146,886 ement	12,241 per unit 1,020 monthly 12,541 per unit 1,045 monthly

Carville Court Redevelopme	nt FOR DISCUS	SSION PURPOSES		Operating Statement
Reno, NV				Page 5
Base Year Rental Revenue	171,456	Construction Start	7/1/2023	
Ancillary Base Year Rental Rever	857	50% Completion	5/1/2024	
Base Year Expenses	146,886	100% Completion	7/1/2024	
First Mortgage Debt Service	0	Placed-in-Service Date	7/1/2024	
		Full Lease Up	10/1/2024	
Income Trending (yrs. 1-3)	2.00%	Conversion	10/1/2024	
Income Trending (yrs. 4-15)	2.00%			
Expense Trending	2.00%			
Vacancy Rate	5.0%			
Replacement Reserve	\$300.00 /unit			
Days of Oper. In Yr. 1	183			

					F	Replacement	Operating				Income/	
		Rental	Ancillary		Operating	Reserve	Reserve	Net Oper	Debt Service	Cash	Expense	Cum
	<u>Year</u>	Revenue	Revenue	Vacancy	Expenses	<u>Funding</u>	<u>Funding</u>	<u>Income</u>	(1st Mtge)	<u>Flow</u>	Ration	Cash Flow
	2224			(4.000)	(44.504)	(0.50)		(= 100)		(= 400)		(= 400)
Year 1*	2024	39,960	202	(1,998)	(44,504)	(850)		(7,190)	-	(7,190)	N/A	(7,190)
Year 2	2025	174,885	874	(8,744)	(149,824)	(3,600)	-	13,591	-	13,591	1.09	6,401
Year 3	2026	178,383	892	(8,964)	(152,821)	(3,745)	-	13,745	-	13,745	1.09	20,146
Year 4	2027	181,950	910	(9,143)	(155,877)	(3,820)	-	14,020	-	14,020	1.09	34,166
Year 5	2028	185,589	928	(9,326)	(158,995)	(3,897)	-	14,300	-	14,300	1.09	48,466
Year 6	2029	189,301	947	(9,512)	(162,174)	(3,975)	-	14,586	-	14,586	1.09	63,053
Year 7	2030	193,087	965	(9,703)	(165,418)	(4,054)	-	14,878	-	14,878	1.09	77,931
Year 8	2031	196,949	985	(9,897)	(168,726)	(4,135)	-	15,176	-	15,176	1.09	93,106
Year 9	2032	200,888	1,004	(10,095)	(172,101)	(4,218)	-	15,479	-	15,479	1.09	108,585
Year 10	2033	204,906	1,025	(10,297)	(175,543)	(4,302)	-	15,789	-	15,789	1.09	124,374
Year 11	2034	209,004	1,045	(10,502)	(179,054)	(4,388)	-	16,104	-	16,104	1.09	140,478
Year 12	2035	213,184	1,066	(10,712)	(182,635)	(4,476)	-	16,427	-	16,427	1.09	156,905
Year 13	2036	217,448	1,087	(10,927)	(186,287)	(4,566)	-	16,755	-	16,755	1.09	173,660
Year 14	2037	221,797	1,109	(11,145)	(190,013)	(4,657)	-	17,090	-	17,090	1.09	190,750
Year 15	2038	226,233	1,131	(11,368)	(193,813)	(4,750)	-	17,432	-	17,432	1.09	208,182
Year 16	2039	230,757	1,154	(11,596)	(197,690)	(4,845)	-	17,781	-	17,781	1.09	225,963

* See Lease-Up Worksheet
Year 1 D\$ #DIV/0! (for calculating 1st yr. mortgage amount)

HOUSING AUTHORITY OF THE CITY OF RENO RESOLUTION 23-03-06 RH

A RESOLUTION APPROVING THE COMMITMENT OF THE HOUSING AUTHORITY
OF THE CITY OF RENO'S ('THE AUTHORITY') HUD FUNDS FOR THE
AUTHORITY'S MOVING TO WORK ("MTW") ACTIVITY #2021-01 REGARDING
AFFORDABLE HOUSING ACQUISITION, DEVELOPMENT, REHABILITATION AND
PRESERVATION

WHEREAS, the Authority approved the use of its HUD funds for its MTW Activity #2021-01 regarding the acquisition, development, rehabilitation and preservation of affordable housing. This approval consists of a commitment of \$4,650,000 for the redevelopment of Carville Court, an existing RHA owned property.

WHEREAS, HUD has also approved the Authority's use of its HUD funds for its MTW Activity #2021-01 regarding the acquisition, development, rehabilitation, and preservation of affordable housing. This approval consists of a commitment of the Authoritiy's HUD funds in the amount of \$4,650,000 for the redevelopment of Carville Court, an existing RHA owned property.

WHEREAS, in order to evidence a formal commitment of HUD reserves held by the Authority for approved MTW activities, the Authority resolves as set forth below.

NOW, THEREFORE, BE IT HEREBY RESOLVED by the Board of Commissioners of the Housing Authority of the City of Reno as follows:

- 1. That the Board of Commissioners hereby approves the Authority's commitment of its HUD funds for its MTW Activity #2021-01 regarding the acquisition, development, rehabilitation, and preservation of affordable housing. The approval consists of a commitment of \$4,650,000 for the redevelopment of Carville Court, an existing RHA owned property.
- 2. This Resolution is to be effective upon the date of its adoption.

ADOPTED THIS _	28 th	DAY OF M	larch , 2023.	
			ATTEST	
CHAIRMAN			SECRETAE	

AGENDA ITEM NUMBER: 12 March 28, 2023

SUBJECT: Possible adoption of Resolution 23-03-07 committing an amount not to exceed

\$7,500,000 in RHA HUD held reserves for MTW Activity #2021-01 for the

redevelopment of Hawk View Apartments. (For Possible Action)

FROM: Executive Director RECOMMENDATION: For Possible Action

Background:

Under current HUD provided guidance to MTW agencies, PHA's utilizing MTW funding flexibility (MTW Block Grant) must provide proof of the commitment of funds when MTW approved activities have a fiscal impact on the PHA.

The proposed development plan for Hawk View Apartments currently consists of demolishing units on a portion of the site and rebuilding 96 new affordable housing units. However, staff asked Praxis Consulting Group, LLC, to estimate the cost of redeveloping the entire site at once and building 200 new units of housing. Based on preliminary financial modeling, an additional \$7.55 million in soft financing would be needed to undertake this larger project.

Staff believes it would be beneficial to redevelop the entire site at once, if possible. It allows for the most flexibility in site design and enables efficiencies in site work and other construction items. It also minimizes the impacts on tenants by reducing the number of families that will remain on site during the construction and enables RHA to provide additional new units for our community. RHA is preparing to solicit a Development Partner for this project and needs to confirm the scope of work for the development. For these reasons, staff recommends committing the additional funding for soft financing from RHA's HUD held reserves. Funds would be provided as a subordinate, below market interest rate loan to the project and repaid over time, in priority order, and to the extent cash flow is available.

Although the Board would commit these funds to the project, staff will continue to actively pursue, in collaboration with the selected Development Partner, alternative funding. This may include State Transferable Tax Credits, Federal Home Loan Bank Affordable Housing Program funds, and National Housing Trust Funds. Any funds received, based on the final project budget, would reduce RHA's soft financing loan to Hawk View Apartments.

A preliminary pro forma is attached for reference. Based on these estimates, the total additional soft financing needed is estimated at \$7,550,000.00.

Staff Recommendation: To commit an amount not to exceed \$7,500,000 in RHA HUD held reserves for MTW Activity #2021-01 for the redevelopment of Hawk View Apartments.

Hawk View Redevelopment

Reno, NV

FOR DISCUSSION PURPOSES ONLY TABLE OF CONTENTS

200-Unit Affordable Family Development Tax-Exempt Bond with 40-year Amort. / 4% LIHTC Financing

Portfolio Analysis

Development Budget		1 -
Development Budget Notes		2
Operating Income Assumptions		3
Operating Expenses		4
Operating Statement		. · · 5··
Lease Up / Reserve Assumptions		6
Tax Credits		7
Debt Analysis - First Mortgage Debt		8
Construction Cash Flow	기상 열차 가장 사람들이 되었다.	9 - 11

Praxis Consulting Group, LLC 3/17/23

Hawk View Redevelopment			FOR	DISCUSSION PL	JRPOSES		Development Budget
Reno, NV			· · · · · ·				Page 1
Sources			•				
oddices	Amount	Rate	Amore		Uses	the second of	
Tax Exempt Debt	19,500,000	6.50%	Amort 40	Acquisition	Land	700.000	790,000
Other Soft Debt	7,550,000	1.00%	40	Acquisition	Land	780,000	780,000
State ARPA	10,000,000	3.14%	40	Hard Costs	Site Work	8,250,000	52,456,640
Limited Partner Equity	31,226,916		0.880		Off-Site Development		02,100,010
GIC Income					Residential Construction	34,700,000	
MM Loan					Appliance, Flooring & Blinds	•	
Def. Dev. Fee	4,813,284	0.00%	15		Bond/Insurance/Testing	-	
Total Sources	73,090,201	٠.	* -		Common Space FF&E	1,000,000	•
Total Soulces	75,090,201			5	General Requirements	2,572,705	
Total Uses	73,090,201				Contractor Overhead Contractor Profit	859,000	
	10,000,201				Hard Cost Contingency	2,577,000 2,497,935	
DSC (yr. 0)	1.1525		• •		nara cost contingency	6,437,333	
DSC (yr. 16)	1.3875			Soft Costs	Architectural & Engineering	3,996,696	9,688,678
Dev. Fee Def.	50.5%			***************************************	Environmental/Soil/Survey	2,550,050	2,000,010
Paid Fee	4,719,716				Impact Fees	1 27	
				•	RE Taxes during construct.	20,000	
					CoC Ins	100,000	
. 7 - SPERMANNE ANGLES EXPOSO SERVICES AND TOURS ON A SECOND	HONE DECRETATION OF THE CONTRACT AND ADDRESS OF THE				Appraisal/Third Party Reports	8,500	
Taxable Bridge Loan Total Bond Issuance Amount	20 000 000		•		Market Study	8,500	
GIC Income	38,000,000				Title & Recording	50,000	•
Cash Flow Prior to Conversion (See Leas	se-Up page) 1,190,792				Developer Legal Marketing/Lease-Up	150,000	
	50 55 pagey (1/30/75E				Capitalized Trustee and Issuer F	50,000 228,000	
Costs of issuance (Estimates)			•		Accounting & Audit	50,000	
NHD Origination Fee (25 bps)	57,750				Construction Loan fee	222,500	
NHD On Going Fee (25 bps/2 prorated)			· · · · · ·		Perm Loan Fees	237,500	
NHD Closing Fee	15,000				Bond Underwriter	-	
NHD Counsel Bond Counsel	7,500			•	Costs of Issuance	203,750	
Trustee Origination Fee	75,000				Const. Period Interest	3,623,311	
Trustee On-Going Fee (5 bps/2 pro rate	3,500 d)	. :	•	:	Blended Interest		
Financial Advisor	45.000			***	Development Consultant NHD Fee	75,000	
Total.	203,750	•			Long Term Rate Cap	353,642	:
· · · · · · · · · · · · · · · · · · ·		•.		100	Soft Cost Contingency	311,278	
			y *		· ·		
		100		Fees/Reserves	Section 8 Reserve	: - *	10,164,883
			1000	F4 8	Operating Reserve	631,883	
					Replacement Reserve		
	•				Developer Fee	9,533,000	
	. •				Total	73,090,201	
•	•	•		and the second second	1 4601	73,030,401	

awk View Redevelopment			100 miles (100 miles)	FUR DI	SCUSSION PUI	RPUSES	1	<u> </u>	Operating Incom	e Assumption
eno, NV nutMix %6AM≀*	Ųnits	% Units	Res. SE	Allowable Monthly Rent *	Less Utility Allowance **	Adj. Aliowable Monthly Rent	Tenant Share Monthly Rent *	Project- Based Section 8	Monthly Revenues	Page Yearly Revenues
Bedroom		er er er er	$(-1)^{n} = (\lambda_{n})^{n}$		a na sii sii					
<50% AMI	7.5	37.5%	650.0	\$876	\$66	\$810	\$8 10	\$0	\$60,750	\$729,00
<60% AMI High HOME	.0	0.0%	650:0	\$1,051	\$0	\$1,051	\$1,051	\$0	\$0	\$(
<60% AMI	. 0	0.0%	650.0	\$1,051	\$0	\$1,051	\$1,051	\$0	\$0	\$
Bedroom										
<50% AMI	100	50.0%	850.0	\$1,051	\$72	\$979	\$979	\$765	\$174,350	\$2,092,20
<60% AMI High HOME	0	0.0%	850.0	\$1,261	\$0	\$1,261	- \$1,261	\$0	\$0	\$
<60% AMI Bedroom	0	0.0%	850.0	\$1,261	\$ 0	\$1,261	\$1,261	\$0	\$0	\$
<50% AMI	25	12.5%	1,150.0	\$1,214	\$84	\$1,130	\$1,046	\$0	700150	6010.00
<60% AMI High HOME	0	0.0%	1,150.0	\$1,457	\$0 \$0	\$1,130	\$1,046	\$0 \$0	\$26,150 \$0	\$313,80 \$
<60% AMI	Ö	0.0%	1,150.0	\$1,457	\$0 \$0	\$O	\$0 \$0	\$0 \$0	\$0 \$0	\$
		, 0.070	1,100.0	9111151	40	Ψ0,	40		40	
nnager's Unit (2-bd)	0	0.0%	1,150.0	\$0	\$0	\$0	\$0	•	\$0	\$
tal	200	100%	133,750						201 200	2 1 2 5 0 0 0
	Avg. Per Unit	10070	669	*			,		261,250	3,135,000
		. TY 1	400		<u> </u>			aundry PUPM @	\$2.50	\$6,00
		: 14 - 1		100	A Committee of the Comm		. Other	Income PUPM @	\$2.50	\$6,00
RHA Energy Efficient UA								1 P P	· .	74 . 1
and the second of the second of the second	in the second			V 1 K (4.5)		er en en	er in the second	Total Income		\$3,147,00
<u></u>	est și	<u> </u>		· .			\$ 1			
HUD 2022 Income Limits (Re	eno, NV MSA) - MT	SP					:		•	

	HUD 2022 Income Limits (Rend	o, NV MSA) - M	TSP	<u> </u>		- K. S.	1	
		1 person	1.5 persons	2 persons	3 persons	4 persons	4.5 persons	5 persons
	30% AMI	19,620	21,030	22,440	25,230	28,020	29,145	30,270
	40% AMI	26,160	28,040	29.920	33,640	37,360	38,860	40,360
٠.	50% AMI	32,700	35,050	37,400	42,050	46,700	48,575	50.450
	60% AMI	39,240	42,060	44,880	50,460	56,040	58,290	60.540
			1000000					

				1					<u></u>
	HUD 2022 Fair M	arket Rents (FM	R) and Payme	nt Sta	ndard (RHA	-1/1/22)			
•			0 bedroom		bedroom	2 bedroom		3 bedroom	4 bedroom
	FMR Rent	5. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	1,060		1,256	1,585	:	2,253	2,700
	110% FMR	<u> </u>	1,166	11.1	1,382	1,744		2,478	2,970

Hawk View Red	development		FOR DISCUSSION PURPOSES	Development Budget - Uses Note
Reno, NV		•		Page
200) units			
4	Uses			
				17
cquisition	Land	780,000	3.79 acres \$205,588 pe	er acre \$3,900
			appraised value	per un
lard Costs	Site Work	8,250,000	estimate grading and slope issues at site	
	Off-Site Development	0		
100	Residential Construction	34,700,000	\$259.44 per NSF includes permits	133,750 NSF residential
1	Appliance, Flooring & Blinds	0	N/A	177,888 total GSF
	Bond/Insurance/Testing	" ō		
	Common Space FF&E	1,000,000	estimate	
	General Requirements	2,572,705	5,99% of hard cost	33.00% grossing factor
	Contractor Overhead	859,000	2.00% of hard cost	Duran a Brooking Indeed
	Contractor Profit	2,577,000	6.00% of hard cost	
	Hard Cost Contingency	2,497,935	5.00% of hard cost 49,958,705	262,283 per unit total
	Time Socie Contingency	5,751,555	Glock of hald code 43,330,103	Located beliant total
	ALita-tural P. Fuscing agric of	2 006 606	9 0006 of hard cost (optimate)	
Soft Costs	Architectural & Engineering	3,996,696	8.00% of hard cost (estimate)	•
	Environmental/Soil/Survey	0	estimate	
	Impact Fees	0	\$0 per unit (water, sewer, tortoise, road	i, parks, etc.) plus permit
100	RE Taxes during construct.	20,000	estimate	
	CoC Ins	100,000	estimate	
	Appraisal/Third Party Reports	8,500		
	Market Study	8,500		•
	Title & Recording	50,000	estimate	
	Developer Legal	150,000	estimate (also includes lender legal)	
	Marketing/Lease-Up	50,000	\$79,241 lease-up deficit, plus marketing (see	Lease-Up sheet)
1900	Capitalized Trustee and Issuer Fe	228,000		•
	Accounting & Audit	50,000	estimate	•
	Construction Loan fee	222,500		41,500,000 Loan size
	Perm Loan Fees	237,500	1.00% of amount plus \$42,500	19,500,000 Loan size
	Bond Underwriter	0		
	Costs of Issuance	203,750	see insert on page	
	Const. Period Interest	3,623,311	7.00% rate See cash flow page	3,623,311
	Blended Interest	0	0.00% rate See cash flow page	0
1000	Development Consultant	75,000		
	NHD Fee	353,642	\$3,000 application fee + 9.5% of credit reservation	on fee + energy audit fee
	Long Term Rate Cap	0		3,548,868
	Soft Cost Contingency	311,278	5.00% of soft costs	
٠.		and the second		
Fees/Reserves	Section 8 Reserve	<i>2</i> 1 ↔ 0		
	Operating Reserve	631,883	3 months expenses, reserves & debt s	ervice 631,88
	Replacement Reserve	0		
10000	Developer Fee	9,533,000	15.0% of TDC incl. land, less fees (QAP Sec.	25.12) 9,533,58
		.,,		-58
	Total	73,090,201		The second secon
•		365,451	per unit	

Hawk View Redevelopment			FOR DI	SCUSSION PU	RPOSES					Орета	ting Statement
Reno, NV	4.7							· · ·	4 81		Page 5
		1.0							100000		
Base Year Rental Revenue		3,135,000			Closing	•		9/1/23			
Ancillary Base Year Rental Revenue		12,000			Construction Sta	rrt .		10/1/23			
Base Year Expenses (less fees)	ta y	1,097,562	-		50% Completion			6/1/24		100	
Management Fee		131,702		1.00	100% Completi	xi		3/1/25			
Issuer and Trustee Fees	` .	58,500		* • • • •	Placed-in-Service			3/1/25			A 100 M
First Mortgage Debt Service		1,369,969		in the second	Full Lease Up	-11 11 11 11 11 11 11 11 11 11 11 11 11		10/1/25			· .
Income Trending (Yrs 0-2)		2.00%			Conversion			3/1/26			
Income Trending (Yrs 3-5)		2.00%					**.			. :	
Income Trending (Yrs. 6-)		2.00%									
Expense Trending	- · · ·	3.00%			100					•	
LIHTC Vacancy Rate	4.5	7.0%									and the second
Replacement Reserve		\$300.00 /	funite:				·	:		Contract Contract	
Days of Oper, in Yr. 1		305				•			•		
		303	•	Operating		Issuer and		er en en en en en en			
GIC	Rental		Ancillary	Expenses	Mgmt.	Trustee	Reserve	Net Oper	Debt Service	Cash	1st Mtg.
Year Income	Revenue	Vacancy	Revenue	less fees	Ese	Fees	Funding	Income	(1st Mton)	Flow	DCR
				12107 137107	E.M.	1000	шинд	IIIGANINE	r 1ar wrânt		LAAN.
Year 0 2024 -					医电影子 化光点		٠		_	. : .	46.7.4
Year 1 * 2025 -	1,821,405	(127,498)	7,005	(951,486)	(76,541)	(58,500)	. i	614,385		614,385	
Year 2 * 2026	3,135,000	(219,450)	12,240	(1,194,646)		(58,500)	(60,000)	1,482,893	(1,369,969)	112,924	1.08
fear 3 2027	3,261,654	(228,316)	12,485	(1,164,404)		(58,500)	(63,654)		(1,369,969)	252,235	1.18
Year 4 2028	3,326,887	(232,882)	12,734	(1,199,336)		(58,500)	(65,564)	1,643,537	(1,369,969)	273,568	1.20
fear 5 2029	3,393,425	(237,540)	12,989	(1,235,316)		(58,500)	(67,531)	1,664,929	(1,369,969)	294,960	1.22
Year 6 2030 ·	3,461,293	(242,291)	13,249	(1,272,375)		(58,500)	(69,556)	1,686,369	(1,369,969)	316,400	1.23
Year 7 2031	3,530,519	(247,136)	13,514	(1,310,546)	(148,360)	(58,500)	(71,643)	1,707,847	(1,369,969)	337,878	1.25
Year 8 2032	3,601,130	(252,079)	13,784	(1,349,863)	(151,328)	(58,500)	(73,792)	1,729,352	(1,369,969)	359,383	1.26
Year 9 2033	3,6 7 3,1 5 2	(257,121)	14,060	(1,390,359)	(154,354)	(58,500)	(76,006)	1,750,872	(1,369,969)	380,903	1.28
fear 10 2034	3,746,615	(262,263)	14,341	(1,432,069)		(58,500)	(78,286)	1,772,396	(1,369,969)	402,427	1.29
Year 11 2035	3,821,548	(267,508)	14,628	(1,475,032)	(160,590)	(58,500)	(80,635)	1,793,911	(1,369,969)	423,942	1.31
Year 12 2036	3,897,978	(272,858)	14,920	(1,519,282)		(58,500)	(83,054)	1,815,402	(1,369,969)	445,433	1.33
Year 13 2037	3,975,938	(278,316)	15,219	(1,564,861)		(58,500)	. (85,546)	1,836,857	(1,369,969)	466,888	1.34
Year 14 2038	1,055,457	(283,882)	15,523	(1,611,807)		(58,500)	(88,112)	1,858,260	(1,369,969)	488,291	1.36
fear 15 2039	4,136,566	(289,560)	15,834	(1,660,161)		(58,500)	(90,755)	1,879,596	(1,369,969)	509,627	-1.37
fear 16 2040	4,219,297	(295,351)	16,150	(1,709,966)		(58,500)	(93,478)	1,900,849	(1,369,969)	530,880	1.39
fear 17 2041	4,303,683	(301,258)	16,473	(1,761,265)		(58,500)	(96,282)	1,922,001	(1,369,969)	552,032	1.40
Year 18 2042 Year 19 2043	4,389,757	(307,283)	16.803	(1,814,103)		(58,500)	(99,171)	1,943,036	(1,369,969)	573,067	1.42
	4,477,552	(313,429)	17,139	(1,868,526)		(58,500)	(102,146)	1,963,934	(1,369,969)	593,965	1.43
Year 20 2044	4,567,103	(319,697)	17,482	. (1,924,582)	(191,920)	(58,500)	(105,210)	1,984,676	(1,369,969)	614,707	1.45
* See Lease-Up Worksheet		· .									
Year 1 DSC 1.15	(for calculation 1	nt.ur mantan									
Year 1 NOI 1,578,946	(for calculating 1:	st yr. mortgage a	imount)			1.7				A	
1001 11001 1110101040									5.0		

Praxis Consulting Group, LLC 3/17/23

	Hawk	View	Redeve	lopment
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Administration			Payroll		
Marketing	0		Manager	80,605	P. 19
Office Supplies	54,228		Assistant Manager	0	
Legal	5,000		Leasing Agent	Ö	
Audit & Tax	6,784		Collections & temp help	0	
Telephone	10,000		Maint. Salaries	74,428	en i i i
Miscellaneous Admin.	0		Employers Payroll Tax	0 0.0%	March 19
NHD Fees	9,000	\$45 per LIHTC unit	Workman's Comp.	0 0.0%	. ".
Other	5,000		Employee Benefits	168,443 108.6%	
TOTAL ADMIN. EXPENSE	90,012		Employee Apt. Rent	0	
			Commissions and Bonuses	0 0.0%	
Utilities			TOTAL PAYROLL EXPENSE	323,476	at in the
Fuel Oil	0		tali dee ka afat ta dida ee ka		
Electric	10,000	0.07 per NSF	Taxes and Insurance		
Natural Gas	4,200	0.03 per NSF	Real Estate Taxes	68,000	
Water	43,000	0.32 per NSF	Misc. Taxes & Permits	0	
Sewer	100,000	0.75 per NSF	Property & Liab. Ins.	40,000	1.00
Cable/Wifi	3,540	0.00 per unit/month	Issuer and Trustee Fees	58,500	
TOTAL UTILITIES	160,740	800	Adjustments	0	100
			TOTAL TAXES & INS.	166,500	
Operating and Maintenance					
Elevator Maintenance	0		Prop. Mgmt. and LIHTC Mgmt. Fee	n <u>s</u> :	100
Extermination	20,000		Property Management Fee	131,702 4.5% of	f EGI
Rubbish Removal	24,000		Bookkeeping Fee	16,334	
Security	12,000		Investor Mgmt. Fee	0	
Grounds/Parking Maint.	0		Prtship Mgmt. Fee	<u> </u>	
Repairs Materials	110,000			148,036	•
Repairs Contract	110,000				
Pool Maint	. 0				
HVAC Maintenance	10,000		TOTAL OPER. EXPENSES	1,287,764 6,439 pe	er unit
— 1			and the first of the control of the	F27	onthly
Turnover Costs	20,000				
Misc. Oper. & Maint. Expens	43,000		Operating Expenses + Replaceme	nt 6,739 pe	er unit
	4.10		Operating Expenses + Replaceme	nt 6,739 pe	

	Hawk View Red	levelopment	and the second			FO FO	R DISCUSSION PUR	POSES				4	Tax Credits
	Reno, NV								-		-, · ·, · · · ·		Page 7
	the state of the state of		*					4 (5					
	•	A	•	(a)		• .						4%	
		and the second		Residential	Comme		Equipment &	Amort Site	Amortize		Non-	:Credit	
	Uses		Tota	Depreciation	Deprecia	tion <u>Acquisition</u>	Personal Prop	I mprym <u>nt</u>	1st Mortgage	Expensed	Depreciation	Basis	
			700.000			_					•	J. 13	11.0
	Land Site Work		780,000	Ü		0	0 0	0	: 0	· . · · · •	780,000	0	
	Off-Site Developme	ent	8,250,000	u		0	0 0	8,250,000	. 0	0	0	8,250,000	
	Residential Constru		34,700,000	34,700,000	1.0	.0	0 0	0	0		0	0	
	Appliance, Flooring		0	0	45.3	0	. 0 0	0			n	34,700,000	
	Bond/insurance/Te		0	· 0,	1.0	0	0 0	o	0	. 0	ő	. 0	
	Common Space FF8		1,000,000	. 0	100	0.	0 1,000,000	. 0	ō	0	·	1,000,000	
	General Requireme		2,572,705	2,572,705		0	0 0	0	. 0	. 0	0.	2,572,705	•
	Contractor Overhea Contractor Profit	ad	859,000	859,000		0 .	0 0	7 - 2 - 1 0	. 0	.0	0	859,000	
	Hard Cost Continge	BOS.	2,577,000 2,497,935	2,577,000 2,497,935		· U	0 0	. 0	0	0	0	2,577,000	
	Architectural & Eng		3,996,696	3,996,696		. 0 .	0 0	0	. 0	0	0	2,497,935	· ·
	Environmental/Soil		0.000,000	0.550,050		n :	0 0	. 0.		: 0	0	3,996,696	
	Impact Fees		ō	ŏ		ŏ ·	0 0	· · · · · · · · · · · · · · · · · · ·		. 0	. 0	. 0	
	RE Taxes during cor	nstruct.	20,000	20,000		. 0	0 0		·· ŏ	ō	:0′	20.000	
	CoC Ins	7	100,000	100,000		0	0 .0	0	0	0	0	100,000	
	Appraisal/Third Par	ty Reports	8,500	8,500		0	0 0	. 0	ó	0	. 0	8,500	-
	Market Study		8,500	8,500		0	0 0	0	. 0	. 0	. 0	8,500	· . · · -
	Title & Recording Developer Legal	•	50,000 150,000	50,000 95,000		0	0 0	. 0		0	0	50,000	: -
,	Marketing/Lease-U	n	50,000	33,000		0	0 0	0	.25,000		30,000	95,000	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
٠.	Capitalized Trustee		228,000	191,034		0 .	0 . 0	. 0		50,000 36,966	0	191,034	
7.	Accounting & Audit		50,000	50,000	e c	Ŏ.	o o	: 0	0	30,300.	Ċ,	50,000	
	Construction Loan	fee	222,500-	222,500	•	0	0 0	ō	· . ŏ	· ŏ	. 0	222,500	· · · · · · · · · · · · · · · · · · ·
	Perm Loan Fees		237,500	. 0		0	0 . 0	. '0	237,500	0	0.	0:	
. •	Bond Underwriter		0.	. 0		0 .	0 0	0	0	' 0	0	. 0	
	Costs of Issuance Const. Period Interes		203,750			0.	0 0	0	203,750		0	0	· · · ·
	Blended Interest	rs.	3,623,311 0	1,167,779		0	0. 0	: 0	. 0	2,455,532	. 0	1,167,779	- '
	Development Cons	ultant.	75,000	75,000		0 .	n . n	0	. 0	0	. 0	. ZE 000	-
	NHD Fee		353,642	0	•	n .	0 0	ń	. 0		353,642	75,000	
	Long Term Rate Ca	IP.	. 0	0		Ō	0 0	ŏ	Ŏ	. 0	. 555,542	. 0	
	Soft Cost Continger	ncy	311,278	311,278	•	0	0 0	0	ō	o o	Ö	311,278	
	Section 8 Reserve		0	:0		0	0 0	. 0	. 0	0	0	. 0	
	Operating Reserve Replacement Reserve		631,883	0.		0.	0 0.	0	0	. 0	631,883	0	
	Developer Fee	ve	. O E22 000	0 532 620		0 .	0 0	0	0	. 0	0	. 0	-
	Developer ree		9,533,000	9,533,000		0	0 0	·. · 0	0	. 0	0	9,533,000	
	TOTAL USES		73,090,201	59,035,927		0	0 1,000,000	8,250,000	466,250	2,542,498	1,795,525		
			1 5,550,201	33,033,327		u		8,230,000	466,230	2,342,498	1,795,525	68,285,927	
			Acquisition	Rehab			Bond 50% Test	· .	1.4				
	•	Eligible Basis		68,285,927	1		Eligible Basis + Lar	nd .	69,065,927	1			
		Wells Adjustment		0		1: 1:	Tax-Exempt Bonds		38,000,000	•			
		QCT/DDA	100%	130%		4.71	50% Test		55.02%				
		Adj. Basis	·	88,771,705	B company	1.5%		. 14,		•	•		
		Appl. Fraction	100.00%	100.00%	·		•			100	A		
		Apr. 21 Rate	4.00%	4.00%							4.		
			.0	3,550,868				:: -				A 1986	
	1	Total Credits (less \$2	K cushion)	3,548,868				1 10		and the second	1. St. 1. St. 1.		
		Estimated Raise	•	0.880	12 1	_			1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1				
		LP share		99.99%	•	Construction In	nterest During Operatio	ons:	2,455,532	bonds	1000		
٠.		Projected Equity		31,226,917		•	•		2,455,532				
		Actual Equity Contrib	unon	31,226,916	1.5				0	Citi Construction I	_oan	-	

Prexis Consulting Group, LLC 3/17/23

Hawk View Redevelopment			
Hawk yiew Regevelopment			

FOR DISCUSSION PURPOSES

Lease Up / Reserve Assumptions

Reno, NV

age 6

							in the state of th		Vacancy	Fixed	Vanable	50.00	Section of			Cash Flow	
			75	100	25	. 96	LIHTC	Total	Ancillary	●	Operating	Operating	Debt	Replacement	Lease-Up	Cum. Lease	
		Date	1 BR	2 BR	3 BR	Leased	Days	Rent	Income	1.026	Expenses	Expenses	Service	Reserves	Reserva	Reserves	
20	25	Jan-25	0	0	0	0%	0	O	0	0	0	0	0	. 0	0	0	
'n.,	٠.	Feb-25	0	· 0'	0	0%	0	0	0	0	0	0		0	. 0	. 0	٠.
έų.	· ·	Mar-25	11	14	4	15%	882 Placed in Ser	37,503	145	376	92,252	2,184	0	0	57,164	\$7,164	
٠		Apr-25	22	28	8	29%	1,764	75,006	290	: 753	92,252	4,368	0	0	22,077	79,241	
4		May-25	33	42	12	44%	2,646	112,509	435	1,129	92,252	6,552	0	0	0 -	79,241	
	: **	Jun-25	:44	56	16	58%	3,528	150,012	580	1,506	92,252	8,736	. 0	0	0	79,241	
. "		Jul-25	55 .	70	- 18	72%	4,350	185,423	715	1,861	92,252	10,769	0.	0	0	79,241.	
		Aug-25	66	84	. 22	86%	5,232	222,926	860	2,238	92,252	12,953	0	0	0	79,241	
•		Sep-25	. 75	96	∴ 25	98%	5,962	254,276	980	2,553	92,252	14,760	0	0	.0	79,241	÷
٠.		Oct-25	75	100	25	100%	6,083 Full Occupani	261,250	1,000	2,623	92,252	15,062	0	0	0	79,241	
, °		Nov-25	75	100	25	100%	6,083	261,250	1,000	. 2,623	92,252	15,062	. 0	0	·. 0	79,241	
v i	1.5	Dec-25	75	100	25	100%	6,083	261,250	1,000	2,623	92,252	15,062	0	0	. 0	79,241	:
20	26	Jan-26	75	100	25	. 100%	6,083 Conversion	261,250	1,020	2,623	95,020	15,514	114,164	5,000	.0	79,241	
*		Feb-26	75	100	25	100%	6,083	261,250	1,020	. 2,623	95,020	15,514	114,164	5,000	0	79,241	. '
٠		Mar-26	. 75	100	25	100%	6,083	261,250	1,020	2,623	95,020	15,514	114,164	5,000	. 0	79,241	
4	1.5	Apr-26	75	100	25	100%	6,083	261,250	1,020	2,623	95,020	15,514	114,164	5,000	0	79,241	
:		May-26	75	100	25	100%	6,083	261,250	1,020	2,623	95,020	15,514	114,164	5,000	; 0	79,241	
		Jun-26	. 75	100	25	100%	6,083	261,250	1,020	2,623	95,020	15,514	114,164	5,000	, 0	79,241	
		Jul-26	75	100	25	100%	6.083	261,250	1,020	2,623	95,020	15,514	114,164	5,000	0	79,241	
		Aug-26	75	100	25	100%	6,083	261,250	1,020	2,623	95,020	15,514	114,164	5,000	0	79,241	
		Sep-26	75	100	. 2.5	100%	6,083	261,250	1,020	2,523	95,020	15,514	114,164	5,000	0	79,241	
		Oct-26	75	100	25	100%	6,083	261,250	1,020	2,623	95,020	15,514	114,164	5,000	0	79,241	
		Nov-26	75	100	25	100%	6,083	261,250	1,020	2,623	95,020	15,514	114,164	5,000	0	79,241	
		Dec-26	75	100	25	100%	6,083	261,250	1,020	2,623	95,020	15,514	114,164	5,000	0	79,241	

Ran	ŧΛ	h	it

٠.	IMMILES OF	1414				·					e .			the second second		
[· · · .	1 BR	2 BR	3 BR	Anc.	I grand t	LITHC	Total	Ancillary		Fixed	Variable	: Debt	Replacement	Lease Up
-1	Year		Rent	Rent	Rent	Income		96	Rent	<u>income</u>	Vacancy	Expenses	Expenses	Service	Reserves	Reserves
- 1	2025		810.	1,744	1,046	5	42,61	4 58.38%	1,821,405	7,005	18,284	922,520	105,507	0.	0	79,241
	2026		826	1,778	1,067	5 "	73,00	0 100.00%	3,135,000	12,240	31,472	1,140,235	186,162	1,369,969	60,000	0

Income trend	- 2.00%
Expense trenu	3100%

Hawk View Redevelopment											•					• • •
Construction Cash Flow Revised: March 17, 2023	l		•			2	3	. 4.	5	. 6.	. 7	. 8	ý	10	1.1	12
Sources		Total Budget	Total Pre-Devipmet	Closing Sep-23	Det-23	Nov-23	Dec 23	Jan-24	Fob-24	Mar-24	Apr 24	May-24	Jun-24	Ju-24	Aug-24	Sep-24
Seginning Cash Fax Exempt Dobt	7.00%	19,500,000			5,315,142	4,740,617	4,685,723	4,570,186	4,333,359	3,975,241	3,568,607	220,115			-	
Kher Soft Debt tate ARPA	1.00% 3.14%	7,550,000 10,000,000		7.550.000	1.5	519,632	983,554	1,911,397	2.839,239.	3,210,377	535,801					:
IHD GAMP Bridge imited Partner Equity	0.00%	31,225,916		3,122,692			· .									1,561,346
4M Predevelopment Loan GC Income 4M Loan	N/A N/A N/A	3,104,522	3,104,522			-										
om Loan Construction Loan Tax Exempt Construction Loan	7.00% 0.00%	35,079,034	٠.									4,026,375	4,269,977	3,927,689,	3,761,898	2,222,496
Faxable Bridge Loain Pof. Dev. Foe	0.50%	4.813,284		- 1 th - 1		*			•			- 4 1				
		111,273,757	3,104,522	10,672,592	5,315,142	5,260,249	5,659,277	6,481,583	7.173.500			·				
onstruction draw schedulg		,2.0,.57	3,10-1,322		1.0%	1.0%	2.0%	: 4.0%	7,172,598 6.0%	7,185,618 6.8%	4,104,408	4,246,490	4,269,977	3,927,689	3,761,898	3,783,842
onstruction draw to date					99%	98%	96%	92%	85%	. 79%	7.3% 72%	8.0% 64%	8.0% 56%	7.3% 49%	6.996 42 M	6.9% 35%
		Total Budget	Total Pre-Devionat	Clasing Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	. Mar-24	Apr-24	May-24	Jun-24	Ju - ≥4	Avg-24	Sep-24
Land		780,000		000,081	,	. 0	·			:						
iio Work Off-Site Development Residential Construction		8,250,000 0			62,500 0	. 82,500 0	165,000	000,000 0	495,000 0	551,000 0	602,250 0	650,000 0	660,000	602,250 0	572,572 0	572,572
ophance, Hooring & Winds Sond/Insurance/Testing		34,700,000 0		•	347,000 0 0	347,000 0 0	. 694,000 0	1,388,000 D	2,082,000	2,359,600	2,533,100	2,776,000 0	000,311,5	. 2,533,100 0	2,408,274 0	2,408,274 D
ammon Space FF&E ieneral Requirements		1,000,000 2,572,705			10,000 25,727	10,000 25,727	20,000 51,454	40,000 102,908	60,000	68.000	73,000	. 0 80,000	80,000	73,000	69.4 03	69.403
Contractor Overhead Contractor Profit		859,000 2,577,000			8,590 25,770	8,590 25,770	17.180 51.540	34,360 103,080	154,362 51,540 154,620	174,944 58,412 175,236	187,807 62,707 188,121	205,816 68,720	205,816	187,807 62,707	178,553 59,617	. 178,553 59,617
lard Cost Contingency Architectural & Engineering		2,497,935 3,996,696	2,997,522		24,9/9 49,959	24,979 49,959	49,959 49,959	99,917 49,959	149,876	169,860 49,959	162,349 49,959	206,160° 199,835 49,959	206,160 199,835 49,959	188,121 182,349 49,959	178,851 173,363 49,959	178,851 173,363 49,959
nvironmental/Sol/Survey npact Fees		0	0	2				,				49,535	5,555	. 47,239	49,519	49,929
E Taxos during construct. oC los		20,000 100,000	. o	100,000							5,000					
Appraisal/Third Party Reports Market Study IIII & Recording		8,500 8,500	8,500 8,500							•		•				
hive a Recording Aveloper Legal Annating/Lease-Up		50,000 (150,000 50,000	50,000	50,000 100,000												
Capitalized Trustee and Issuer Fees Accounting & Aucht		228,000 50,000	Ó	228,000				· · ·								
anstruction Loan fee ferm Loan Fees		222,500 237,500	•	222,500 237,500												•
Sond Underwriter Costs of Issuance		0 2 03 ,750	٥	203,750		•										•
Const. Period Interest Bended Interest		3.623,311 0	100		0		0	0 0	. 0	0 .	. 0	0	23,487	48,395 0	71,307	93,251
Development Consultant NHD Fee		75,000 353,642	20,000	30,000	. :					-		•	•	•	. •	
ong Tarm Rate Cap oft Cost Contingency lection 8 Reserve		0 311,278	20,000	Z 91,278						•						
leplacement Reserve Merating Roserve Mecoon & Reserve		631,683 0							٠.	1						٠.
eplacement reserve Betarred Dev. Fee Sid Dev. Fee		4,813,284 4,719,716		1		. :			1.0			•				
Apayment of MM Predevelopment L Repayment of Loan	Loan .	3,104,522 35,079,034	1	3,104,522												
lepayment of Tax-Exempt Loan tepayment of Taxable Bridge Loan tepayment of NHD GAH? Bridge		0										***;				• •
otal Uses	:	111,273,757	3,104,522	5,357,550	574,525	574,525	1,039,092	2,148,224	3,197,357	3,61,7,010	3,884,293	4,246,490	4,269,977	3,927,589	3,761,898	3,783,842
Ending Cash		0	0	5,315,142	4,740,617	4,685,723	4,570,186	4,333,359	3,975,241	3,568,607	220,115	0		0	. 0	0,100,040

Reno, NV	· ·		· · · · · · · ·	The second second	500,000			Page
Nello, ITT	100				.	Bank Const.	N/A	Bank Pen
•				1 month SOFR		4.32%	0.00%	4.32
Principal .		19,500,000		Fixed Rate		0.00%	0.00%	0.00
nterest Rate	1.5	6.50%		rate lock		0.00%	0.00%	0.00
Amortization Period		40		SWAP Fee		0.00%	0.00%	0.00
Term	6 a	18		Interest Rate Cushion		0.00%	0.00%	0.00
Beginning Date		1/1/26		spread		2.38%	0.00%	1.88
Monthly Payment		114,164	1;369,969		100	0.30%	0.00%	0.30
Monuny Fayment		דטוּידִוו	1,305,505	Total		7.000%	0.000%	6.500
	Ending			10001	Ending	1,000,0	0.000.	
Year	Date	Payment	Principal	Interest	Balance			
				21001000	- Landerson .		5 4	
- N					19,500,000		100	
0	12/31/26	1,369,969	105,577	1,264,391	19,394,423			1.1
1 .	12/31/27	1,369,969	112,648	1,257,321	19,281,774			
2	12/31/28	1,369,969	120,192	1,249,777	19,161,582			
3	.12/31/29	1,369,969	128,242	1,241,727	19,033,340		1 .	
, 3 4 .	12/31/30	1,369,969	136,831	1,233,138	18,896,509			- ''
5	12/31/30				18,750,515			
6		1,369,969	145,994	1,223,975			·	
	12/31/32	1,369,969	155,772	1,214,197	18,594,743		the second second	
7	12/31/33	1,369,969	166,204	1,203,765	18,428,539		.:	
8	12/31/34	1,369,969	177,335	1,192,634	18,251,204			
9	12/31/35	1,369,969	189,212	1,180,757	18,061,992			
10	12/31/36	1,369,969	201,883	1,168,085	17,860,109			
11 .	12/31/37	.1,369,969	215,404	1,154,565	17,644,705			
12	12/31/38	1,369,969	229,830	1,140,139	17,414,875			
13	12/31/39	1,369,969	245,222	1,124,747	17,169,653			
14	12/31/40	1,369,969	261,645	1,108,324	16,908,008		•	
15	12/31/41	1,369,969	279,168	1,090,801	16,628,840			4.0
16	12/31/42	1,369,969	297,864	1,072,105	16,330,975			
17	12/31/43	1,369,969	317,813	1,052,156	16,013,162	s et e	and the second	14.77
18	12/31/44	1,369,969	339,097	1,030,872	15,674,065			
-19	12/31/45	1,369,969	361,807	1,008,162	15,312,257	1.0		
. 20	12/31/46	1,369,969	386,038	983,931	14,926,219			4.
21	12/3.1/47	1,369,969	411,892	958,077	14,514,327		and the second	100
22	12/31/48	1,369,969	439,477	930,492	14,074,850		the second second	
23	12/31/49	1,369,969	468,910		13,605,940			
24	12/31/50	1,369,969	500,314	869,655	13,105,627	in		
	12/31/51	1,369,969	533,820		12,571,806	A		
26	12/31/52	1,369,969	569,571		12,002,235			
27					11,394,518		· : : : : : : : : : : : : : : : : : : :	
	12/31/53	1,369,969	607,717	762,252				
28	12/31/54	1,369,969	648,417	721,552	10,746,101			
29	12/31/55	1,369,969	691,842	678,127	10,054,259			
30	12/31/56	1,369,969	738,176	631,793	9,316,083		and the second	100
	12/31/57	1,369,969	787,613	582,356	8,528,470			
32	12/31/58	1,369,969	840,361	529,608	7,688,108		.'	· .
33	12/31/59	1,369,969	896,642	473,327	6,791,467			
34	12/31/60	1,369,969	956,691	413,277	5,834,775			
35	12/31/61	1,369,969	1,020,763	349,206	4,814,012			
36	12/31/62	1,369,969	1,089,125	280,844	3,724,887			
37	12/31/63	1,369,969	1,162,066	207,903	2,562,821		*. *.	
38	12/31/64	1,369,969	1,239,892	130,077	1,322,930		A 10 A 10 A	
39	12/31/65	1,369,969	1,322,930	47,039	0	er e		· .
40	12/31/66							

Praxis Consulting Group, LLC 3/17/23

Ending Cash	Total Uses	Repayment of	Repayment of	Repayment of Loan	Repayment of	Defeared Dev. Fee	Replacement Reserve	Operating Reserve	Soft Cost Contingency	Long Term Rate Cap	NHD For	Slended Interest	Const. Period Interest	Costs of Isluance	Parm Loan Fees	Construction Loan fee	Acceptanced Invited	Marketing/Lease Up	Developer Legal	Title & Recordson	Appraisal/Thir	CoC Ins	RE laxes during construct.	Environmental/Soli/Survey	Architectural &	Hard Cost Continuency	Contractor Overhead	General Requirements	Common Space Fr &F	Appliance, Flooring & Blinds	Residential Construction	Site Work	Land	Lises		Construction draw to date	Construction of		Dal Dev. Fee	Taxable Bridge Loan	Construction Loan Tay Exempt Constr	MM Loan	MM Pradevelopment Loan	. Unrided Partner Equity	State ARPA	Output Soft Debt	Beginning Cash	Sources	Revised	Hawk View Construction
		epayment of N=10 GAHP Bridge	epayment of Taxable Bridge Loan	035	apayment of NM Prodevelopment Loan	Fee	eserve .	2 4	Abushin	e Cap	Consultant	2	alorgst .	, iii		oan fee	iptaided inusting and issuer Fees Yearsting & Audit	Se Cla	= 2	.	opradal/Third Party Reports		a consinuct	VSali/Survey	Engineering	MIC	erhead	ements	a/lesting	about & print	regundent Opment					have to date	Construction draw schedule			Loan	as Exempt Construction Loan		prepared Loan	ir Equally		У <u>Б</u>	F		March 17, 2023	Hawk View Redevelopment Construction Cash Flow
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View Redevelopment action Cash Flow March 17, 2023	1	13	5. 14	15	16	r 17	18 Place in Service	19 . Relgase	20	.21	22	23	. 24	25 100%	26	
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HOUSING AUTHORITY OF THE CITY OF RENO RESOLUTION 23-03-07 RH

A RESOLUTION APPROVING THE COMMITMENT OF THE HOUSING AUTHORITY
OF THE CITY OF RENO'S ('THE AUTHORITY') HUD FUNDS FOR THE
AUTHORITY'S MOVING TO WORK ("MTW") ACTIVITY #2021-01 REGARDING
AFFORDABLE HOUSING ACQUISITION, DEVELOPMENT, REHABILITATION AND
PRESERVATION

WHEREAS, the Authority approved the use of its HUD funds for its MTW Activity #2021-01 regarding the acquisition, development, rehabilitation and preservation of affordable housing. This approval consists of a commitment of \$7,500,000 for the redevelopment of Hawk View Apartments, an existing RHA owned property.

WHEREAS, HUD has also approved the Authority's use of its HUD funds for its MTW Activity #2021-01 regarding the acquisition, development, rehabilitation and preservation of affordable housing. This approval consists of a commitment of \$7,500,000 for the redevelopment of Hawk View Apartments, an existing RHA owned property.

WHEREAS, in order to evidence a formal commitment of the Authority's HUD funds for approved MTW activities, the Authority resolves as set forth below.

NOW, THEREFORE, BE IT HEREBY RESOLVED by the Board of Commissioners of the Housing Authority of the City of Reno as follows:

- That the Board of Commissioners hereby approves the Authority's commitment of its HUD funds for its MTW Activity #2021-01 regarding the acquisition, development, rehabilitation, and preservation of affordable housing. This approval consists of a commitment of \$7,500,000 for the redevelopment of Hawk View Apartments, an existing RHA owned property.
- 2. This Resolution is to be effective upon the date of its adoption.

ADOPTED THIS _	28 th	DAY OF_	March	<u>,</u> 2023.		
			ļ	ATTEST		
CHAIRMAN				SECRETA	\RY	

AGENDA ITEM NUMBER: 13 March 28, 2023

SUBJECT: Discussion and possible action to authorize the Executive Director to negotiate

and execute a Professional Services Agreement with the selected Relocation Firm for relocation services at Hawk View Apartments in an amount not to

exceed \$225,000. (For Possible Action)

FROM: Executive Director RECOMMENDATION: For Possible Action

Background:

Staff let a Request for Qualifications to select a firm to assist RHA with relocation services. Staff received responses from three firms and conducted follow up interviews with each firm. Staff has identified its top firm, Housing to Home, and has reached out to notify them of selection, subject to Board's approval of this item.

As previously discussed with the Board, residential relocation will be a component of the redevelopment of Hawk View Apartments. Staff has currently scheduled two resident meetings on April 5, 2023, to discuss the proposed redevelopment plans, anticipated relocation, and receive resident input. Staff would prefer the selected relocation firm to attend these meetings and begin familiarizing themselves with development plans and resident questions. Based on preliminary budgets, staff anticipates that the total cost for relocation services from the selected firm will be up to \$225,000. This includes the selected firm's cost to provide assistance and advisory services to RHA and tenants throughout the 24-36 month project period. Such services include meeting with tenants and developing individualized relocation plans, arranging transportation to view comparable units, arranging packing and moving services, calculating and overseeing relocation payments, working with tenants to minimize impacts from the relocation, providing proper noticing, and additional services. Funding for these services has been budgeted in the 5-Year Capital Needs Plan.

The actual cost for tenant relocation is separate and will depend upon various factors such as, but not limited to, household needs, availability of comparable public housing or other housing options, and availability of housing choice vouchers.

Given the short turnaround time between selecting the firm and the scheduled resident meetings, staff is requesting authorization for the Executive Director to negotiate and execute a Professional Services Agreement with the selected relocation firm for this project in an amount not to exceed \$225,000. Individual task orders for specific items will then be issued for tasks by the Executive Director or her designee up to the amount of the contract.

Staff Recommendation: Authorize the Executive Director to negotiate and execute a Professional Services Agreement with the selected Relocation Firm for relocation services at Hawk View Apartments in an amount not to exceed \$225,000.

AGENDA ITEM NUMBER: 14 March 28, 2023

SUBJECT: Discussion and possible action to authorize the Executive Director to negotiate

and execute a Professional Services Agreement with the selected Relocation Firm for relocation services at Silverada Manor in an amount not to exceed

\$350,000. (For Possible Action)

FROM: Executive Director RECOMMENDATION: For Possible Action

Background:

Staff let a Request for Qualifications to select a firm to assist RHA with relocation services. Staff received responses from three firms and conducted follow up interviews with each firm. Staff has identified its top firm, Housing to Home, and has reached out to notify them of selection, subject to Board's approval of this item.

As previously discussed with the Board, residential relocation will be a component of the redevelopment of Silverada Manor. Staff has currently scheduled two resident meetings on April 4, 2023, to discuss the proposed redevelopment plans, anticipated relocation, and receive resident input. Staff would prefer the selected relocation firm to attend these meetings and begin familiarizing themselves with development plans and resident questions. Based on preliminary budgets, staff anticipates that the total cost for relocation services from the selected firm will be up to \$350,000. This includes the selected firm's cost to provide assistance and advisory services to RHA and tenants throughout the 24–36-month project period. Such services include meeting with tenants and developing individualized relocation plans, arranging transportation to view comparable units, arranging packing and moving services, calculating and overseeing relocation payments, working with tenants to minimize impacts from the relocation, providing proper noticing, and additional services. Funding for these services has been budgeted in the 5-Year Capital Needs Plan.

The actual cost for tenant relocation is separate and will depend upon various factors such as, but not limited to, household needs, availability of comparable public housing or other housing options, and availability of housing choice vouchers.

Given the short turnaround time between selecting the firm and the scheduled resident meetings, staff is requesting authorization for the Executive Director to negotiate and execute a Professional Services Agreement with the selected relocation firm for this project in an amount not to exceed \$350,000. Individual task orders for specific items will then be issued for tasks by the Executive Director or her designee up to the amount of the contract.

Staff Recommendation: Authorize the Executive Director to negotiate and execute a Professional Services Agreement with the selected Relocation Firm for relocation services at Silverada Manor in an amount not to exceed \$350,000.

AGENDA ITEM NUMBER: 15 March 28, 2023

Discussion and possible action to approve the Purchase and Sale Agreement (PSA) for the property located at 419 10th Street for \$775,000. (For Possible SUBJECT:

Action)

Executive Director RECOMMENDATION: For Possible Action FROM:

AGENDA ITEM NUMBER: 16 March 28, 2023

SUBJECT: Discussion and possible direction to staff regarding the status of RHA's

scattered site portfolio and potential long-term strategy for these properties.

(For Possible Action)

FROM: Executive Director RECOMMENDATION: For Possible Action

Background

The Reno Housing Authority owns, manages, maintains, and rents 166 scattered site properties that comprise RHA's Scattered Site Portfolio. All properties in this portfolio are owned by RHA with none carrying debt. All are either single family homes, condo/townhomes or manufactured homes. The market value of the portfolio is over \$56 million dollars based on current Zillow property values. Based on current items identified by RHA maintenance staff, the capital needs are estimated at \$212,000 across the entire portfolio for the next 5-years.

The RHA acquired the majority of these properties, 161 to be exact, during or shortly after the foreclosure crisis that occurred between 2007-2010. RHA utilized different programs funded by federal fiscal recovery monies to purchase and rehab the homes. Each program has its own regulations regarding income restrictions, rent limits, and affordability periods. RHA has continued to comply with program guidelines, but with the last property being purchased over nine years ago and the country experiencing a very different housing market than during the foreclosure crisis, it is time to review the portfolio and create a long-term plan for use of the properties.

Based on staff's discussions within the agency, with RHA clients and community stakeholders, and local non-profit agencies, options for properties in the portfolio could include homeownership opportunities for low-income families, first generation homebuyers, or specific groups (public service employees, teachers, law enforcement, etc.), continued rental revenue for the authority, donation to local non-profit organizations for supportive housing, or leveraging funds for the Authority to develop additional affordable housing.

To aid in a discussion regarding these properties, the below listed data is being provided:

- A map indicating the location of all scattered site properties identified by the funding source used to purchase the property, as well as five additional maps that further break down Washoe County into sub-areas and the properties in those sub-areas.
- A spreadsheet containing a data summary of each property to include property demographics, funding source used for purchase, purchase data, current income and rent limitations as well as an estimate of capital needs for the coming 5-years.
 The spreadsheet can be sorted by any field to better group properties.

 A breakdown and description of the funding sources including RHA fund identifier numbers, number of units in each funding source and the name of the outside agency that RHA will need to consult if properties are to be sold.

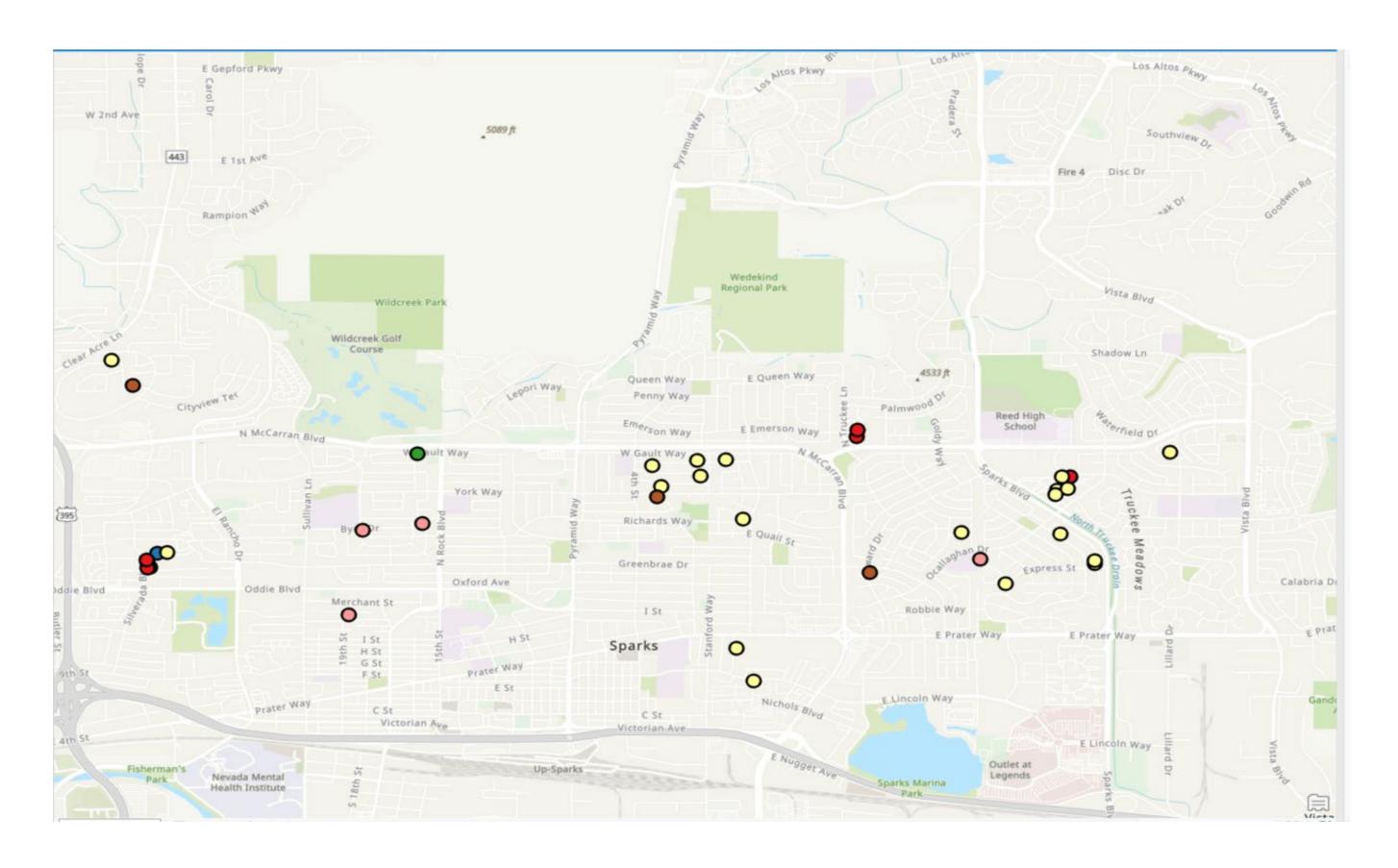
Staff is still in the process of compiling the following data:

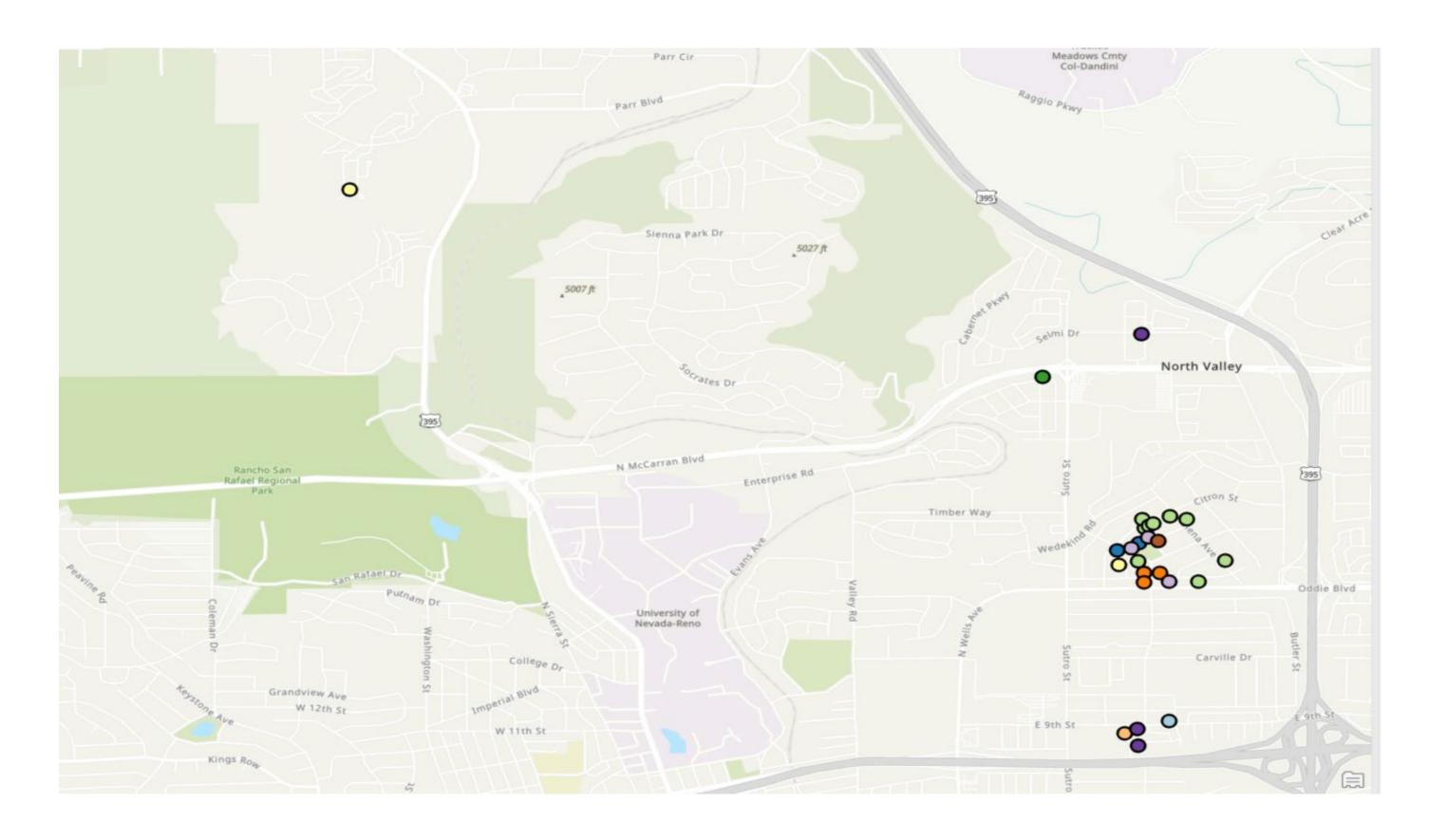
- Individual property income and expense analysis over the past five years.
- Average cost to turn a property after move-out.
- Mortgage and down-payment assistance estimates for properties sold to households with incomes at 50% and incomes at 120% AMI, respectively. These scenarios would be without use of a Community Land Trust (CLT).
- Lending and down payment assistance options if a property is sold after being placed in a CLT without the land as part of the purchase.

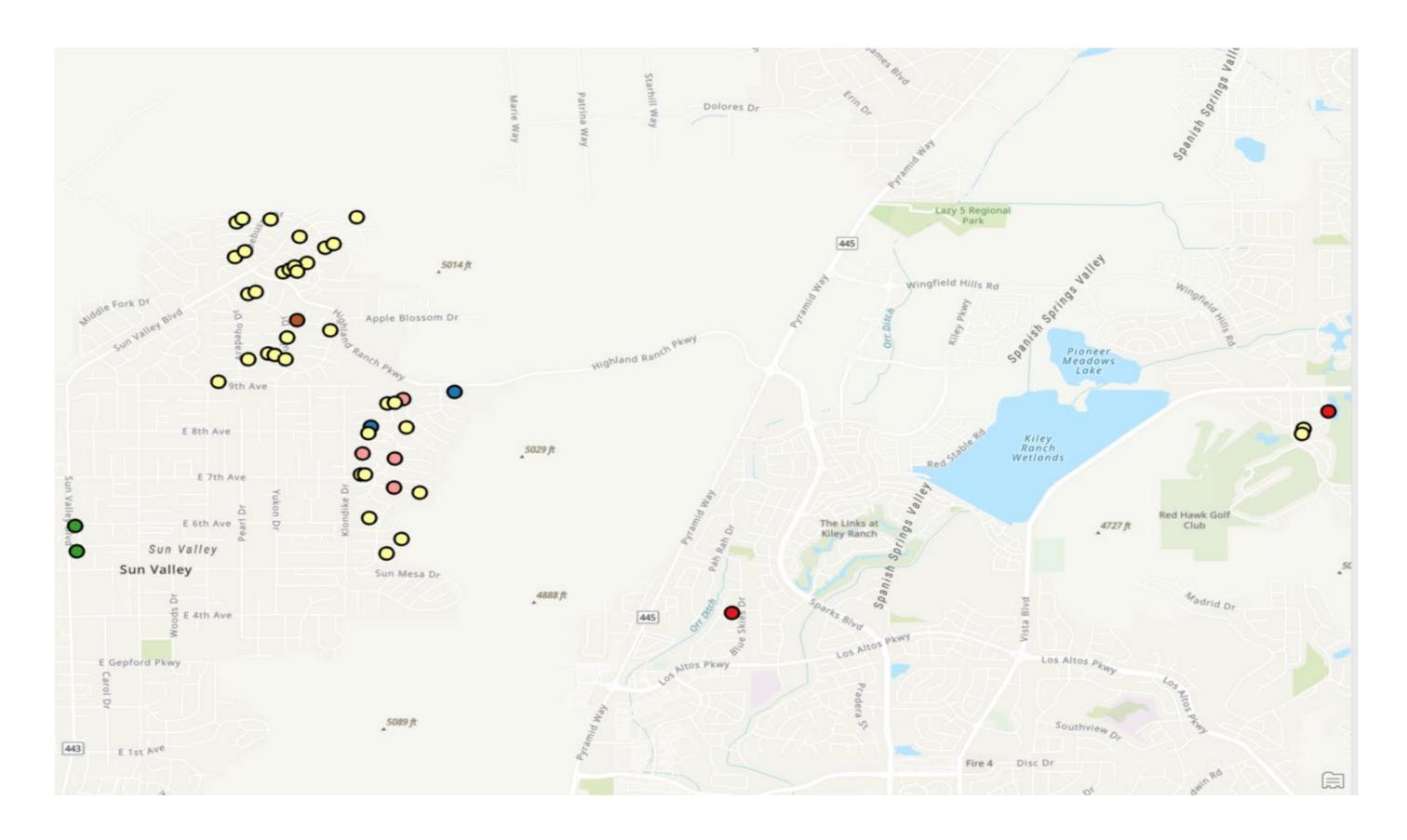
It should also be noted that:

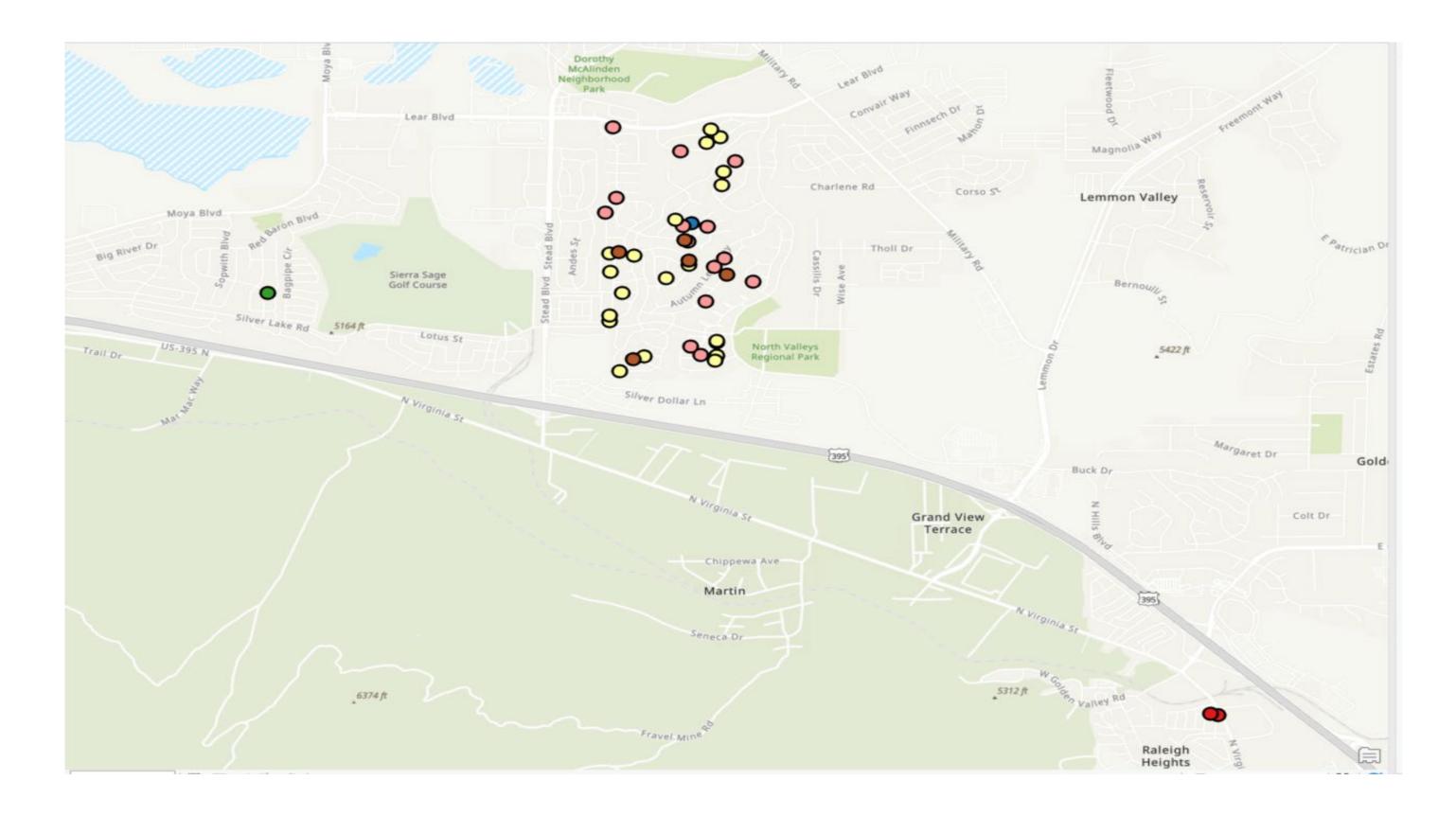
- Any property being utilized as a rental that was purchased using federal fiscal recovery funds must maintain its income restrictions as well as rent limits through the designated affordability period noted on the spreadsheet.
- Any property being utilized for homeownership that was purchased using federal
 fiscal recovery funds must maintain its income restrictions through the designated
 affordability period noted on the spreadsheet meaning properties must be sold to
 families with income that meet the income restrictions specific to the property.
- RHA may donate a property to a local non-profit, with outside agency approval, if income and rent restrictions are maintained by the non-profit organization through the affordability period. RHA will need to monitor compliance.
- RHA will need to obtain HUD or other outside agency, such as State of Nevada or City of Reno, approval for sale or donation of specific properties.
- Properties purchased through HUD's Good Neighbor Program (\$1 homes) do not have income or rent limitations and can be sold without approval from HUD.
 Current income and rent limits were set by RHA to serve low-income families.
 Therefore, there is more flexibility with these units.
- Properties donated to RHA do not have income or rent limitations and can be sold with only Board approval. Current income and rent limits were set by RHA to serve low-income families. As with the above, there is more flexibility with these properties.

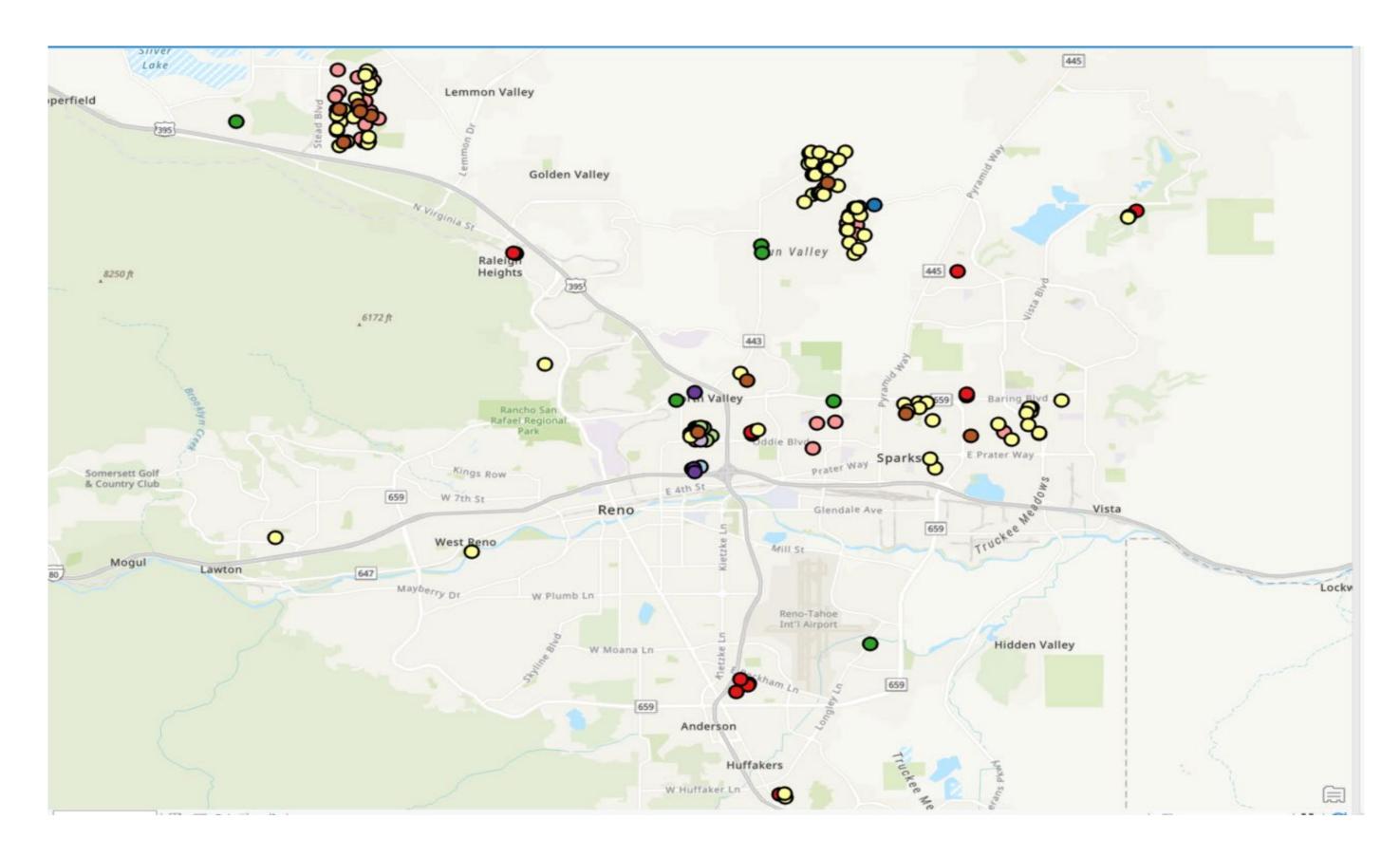
As part of today's discussion, staff is seeking Board direction regarding desired uses of scattered site properties based on suggested uses listed above or other alternatives. Staff is also seeking direction regarding additional data desired by the Board to further this discussion.











-																Scattered Site Data				
Address	City	Zip Neighborhood	Bedroom Size	Square Footage	SFH or Condo	Purchase Price	Rehab Cost	Total Initial (Current Zillow Value	Date Purchased	RHA Fund Number Source	Funding Source	Income Restrictions as % of AMI	Affordability Period Expiration	Rent Limit (HOME, etc.)	Max Rent Based on HOME, PBV or LIHTC Regs	PB⊕ge Assigned	Being C	1 Estimated Capital Needs In next ~5 years	
1412 9th St #6	Reno	89512 Central Reno W 395	2	832	Condo	\$ -	\$ 33,795	\$ 33,795	224,600	N/A	415	Donated	80%	N/A	Low	\$ 1,051				
1400 9th St #3	Reno	89512 Central Reno W 395	2/1	832	Condo	\$ 135,000		\$ 135,000	279,300	6/13/2017	520	Donated	80%	N/A	Low	\$ 1,051				
1424 9th St #4	Reno	89512 Central Reno W 395	2/1	992	Condo	\$ 163,000		\$ 163,000	249,900	6/13/2017	520	Donated	80%	N/A	Low	\$ 1,051				
1486 Selmi Dr	Reno	89523 Central Reno W 395	1/1	550	Condo	\$ 120,000		\$ 120,000	181,600	6/15/2017	520	Donated	80%	N/A	Low	\$ 876				
200 Smithridge Pk	Reno	89502 West and South Reno	3/1.5	1220	Condo	\$ 1.00	\$ 6,061	\$ 6,062	258,100	7/2/2009	411	GNP	80%	N/A	Low	\$ 1,214				
2193 Barberry Wy	Reno	89512 Central Reno W 395	3/2	1248	Mobile	\$ 1.00	\$ 17,135	\$ 17,136	295,400	1/29/2010	411	GNP	80%	N/A	Low	\$ 1,214		ć	\$ 13,000	
2751 Pajaro Pl	Reno	89502 West and South Reno	3/2.5	1568	SFH	\$ 1.00	· · · · · ·	\$ 26,139	420,400	7/16/2009	411	GNP	80%	N/A	Low	\$ 1,214				
2790 16th St	Sparks	89431 Central Reno E 395/Sparks	3/1.5	1568	Condo	\$ 1.00		-	307,800	7/21/2009	411	GNP	80%	N/A	Low	\$ 1,214				
5546 Sun Valley Blvd	Sun Valley	89433 North Sun Valley/Spanish Springs	3/2	1440	Mobile	\$ 1.00		\$ 25,881	273,700	2/19/2010	411	GNP	80%	N/A	Low	\$ 1,214		igoplus		
8480 Red Baron Blvd	Reno	89506 North Valleys	2/2	1162	SFH	\$ 1.00			350,400	5/28/2009	411	GNP	80%	N/A	Low	\$ 1,585	PBM	Х		
7820 Claridge Pointe Pkwy	Reno	89506 North Valleys	3/2	1164	SFH	\$ 1.00			353,600	8/19/2011	414	GNP	80%	N/A	Low	\$ 1,214		+-+		
5591 Dayspring Ln	Sun Valley	89433 North Sun Valley/Spanish Springs	3/2	1361	SFH	\$ 126,000			305,100	2/16/2010	411	GNPR	80%	N/A	Low	\$ 1,214	DDD	, , , , , , , , , , , , , , , , , , ,	\$ 5,100	
2000 Silverada Blvd #124	Reno	89512 Central Reno E 395/Sparks	1/1	654 654	Condo	\$ 46,000 \$ 37,000	\$ 11,218 \$ 782		185,800	10/19/2012	414	GNPR	80% 80%	N/A	Low	\$ 876 \$ 876	PBP	Х		
2000 Silverada Blvd #311	Reno Reno	89512 Central Reno E 395/Sparks 89502 West and South Reno	1/1 3/1.5	1220	Condo	\$ 37,000	\$ 23,596		187,300	7/16/2012	414	GNPR GNPR	80%	N/A N/A	Low	\$ 1,214		+		
207 Smithridge Pk 2627 Sunny Slope Dr #3	Sparks	89434 Central Reno E 395/Sparks	2/2	824	Condo Townhouse	\$ 94,909	\$ 23,596	\$ 74,596	269,600	3/30/2012 1/24/2014	414	GNPR	80%	N/A N/A	Low	\$ 1,214		 	\$ 6,600	
3124 Bristle Branch Dr	Sparks	89434 Central Reno E 395/Sparks	2/2	945	Condo	\$ 74,250			245,100	1/22/2014	414	GNPR	80%	N/A	Low	\$ 1,585	PBM	X	0,000	
3127 Bristle Branch Dr	Sparks	89434 Central Reno E 395/Sparks	2/2	945	Condo	\$ 74,250	\$ 30,211	\$ 104,461	245,400	3/21/2014	414	GNPR	80%	N/A	Low	\$ 1,585	PBM	X		
351 Smithridge Pk	Reno	89502 West and South Reno	2/1.5	1229	Condo	\$ 40,000	\$ 29,063	\$ 69,063	252,500	4/19/2012	414	GNPR	80%	N/A	Low	\$ 1,051				
353 Smithridge Pk	Reno	89502 West and South Reno	2/1.5	1220	Condo	\$ 55,000			254,500	7/16/2012	414	GNPR	80%	N/A	Low	\$ 1,051				
548 Smithridge Pk	Reno	89502 West and South Reno	2/1.5	1229	Condo	\$ 40,000			255,300	4/19/2012	414	GNPR	80%	N/A	Low	\$ 1,051				
555 Patriot Blvd #158	Reno	89511 West and South Reno	2/1	835	Condo	\$ 104,000	\$ 21,222		219,400	6/10/2015	414	GNPR	80%	N/A	Low	\$ 1,585	PBM	Х		
555 Patriot Blvd #176	Reno	89511 West and South Reno	2/1	835	Condo	\$ 90,000	\$ -	\$ 90,000	285,250	12/22/2014	414	GNPR	80%	N/A	Low	\$ 1,585	PBM	Х		
6180 Ingleston Dr #321	Sparks	89436 North Sun Valley/Spanish Springs	2/2	1156	Condo	\$ 158,050	\$ 9,868	\$ 167,918	329,600	4/30/2015	414	GNPR	80%	N/A	Low	\$ 1,585	PBM	Х		
6780 Pah Rah Dr	Sparks	89436 North Sun Valley/Spanish Springs	3/2	1493	SFH	\$ 105,500	\$ 10,909	\$ 116,409	418,600	3/27/2013	414	GNPR	80%	N/A	Low	\$ 1,214				
7845 Claridge Pointe Pkwy	Reno	89506 North Valleys	3/2	1176	SFH	\$ 57,360	\$ 29,568	\$ 86,928	292,300	7/28/2012	414	GNPR	80%	N/A	Low	\$ 1,214		ţ	\$ 5,100	
921 Sage St	Reno	89512 Central Reno W 395	4/2	1469	SFH	\$ 104,003	\$ 3,486	\$ 107,489	329,000	7/22/2002	336	N/A	N/A	N/A	N/A	\$ 1,355				
11575 Lone Desert Dr	Reno	89506 North Valleys	4/3	2383	SFH	\$ 161,870	\$ 28,775	\$ 190,645	476,100	10/16/2009	412	NSP1	120%	10/16/2029	High	\$ 1,704				
11765 Lone Desert Dr	Reno	89506 North Valleys	5/3	2170	SFH	\$ 148,765	\$ 25,486	\$ 174,251	462,700	8/27/2009	412	NSP1	120%	8/27/2029	Low	\$ 1,495				
11860 Desert Bloom Dr	Reno	89506 North Valleys	3/2	1292	SFH	\$ 107,242	· · · · · ·		377,200	2/23/2011	412	NSP1	50%	2/23/2031	Low	\$ 1,214				
12003 Kernite Dr	Reno	89056 North Valleys	3/2	1600	SFH	\$ 131,000	\$ 22,872	\$ 153,872	397,200	9/16/2010	412	NSP1	120%	9/16/2030	High	\$ 1,704				
12060 Camel Rock Dr	Reno	89506 North Valleys	3/2.5	1736	SFH	\$ 145,000	\$ 22,606	\$ 167,606	425,100	12/11/2009	412	NSP1	120%	12/11/2029	High	\$ 1,545		ţ	\$ 6,600	
14020 Obsidian Ct	Reno	89506 North Valleys	3/2	1008	SFH	\$ 73,024	\$ 38,930		320,600	9/10/2009	412	NSP1	50%	9/10/2029	Low	\$ 1,214			\$ 9,600	
1699 Woodhaven Ln	Sparks	89434 Central Reno E 395/Sparks	3/2	1266	SFH	\$ 112,200	\$ 19,723		389,900	7/27/2009	412	NSP1	50%	7/27/2029	Low	\$ 1,214		+-+		
1845 Brunetti Wy	Sparks	89431 North Sun Valley/Spanish Springs	3/2	1382	SHF	\$ 100,259	\$ 60,165		366,800	8/27/2009	412	NSP1	50%	8/27/2029	Low	\$ 1,214		+++;	\$ 5,600	
1980 18th St	Sparks	89431 Central Reno E 395/Sparks	3/2	1715	SFH	\$ 105,797	\$ 26,858	\$ 132,655	345,400	9/18/2009	412	NSP1	50%	9/18/2029	Low	\$ 1,214		+++	\$ 13,500	
2055 Oppio St	Sparks	89431 Central Reno E 395/Sparks	4/3	1715	SFH	\$ 107,460	\$ 29,565	\$ 137,025	391,700	7/29/2009	412	NSP1	50%	7/29/2029	Low	\$ 1,355		+ +	\$ 6,400	
5651 Cranberry Ct	Sun Valley	89433 North Sun Valley/Spanish Springs	3/2	1064	SFH	\$ 90,100	\$ 20,567	\$ 110,667	365,400	7/27/2009	412	NSP1	50%	7/27/2029	Low	\$ 1,214	DDC	- V		
5768 Sculptor Ct 5784 Apricot Ct	Sun Valley Sun Valley	89433 North Sun Valley/Spanish Springs 89433 North Sun Valley/Spanish Springs	3/2	1144 1505	SFH SFH	\$ 106,250 \$ 97,750				5/14/2009 7/27/2009	412 412	NSP1 NSP1	50% 50%	5/14/2029 7/27/2029	Low	\$ 2,253 \$ 1,214	PBS	Х		
846 Cloudy Ct	Sun Valley	89433 North Sun Valley/Spanish Springs	3/2	1040	SFH	\$ 98,069			355,500	5/14/2009	412	NSP1	50%	5/14/2029	Low	\$ 1,214		+-+		
9200 Running Dog Cir	Reno	89506 North Valleys	2/1.5	1120	SFH	\$ 86,000				7/30/2009	412	NSP1	120%	7/30/2029	Low	\$ 1,051				
9530 Angel Falls Dr	Reno	89506 North Valleys	4/2.5	2122	SFH	\$ 118,000			460,900	2/5/2010	412	NSP1	120%	2/5/2030	High	\$ 1,704		1	\$ 6,100	
9557 Black Canyon Dr	Reno	89506 North Valleys	3/2	1215	SFH	\$ 133,000			378,100	11/6/2009	412	NSP1	50%	11/6/2029	Low	\$ 1,214		1	\$ 10,000	
9562 Canyon Meadows Dr	Reno	89506 North Valleys	4/2.5	2100	SFH	\$ 132,650				2/1/2010	412	NSP1	120%	2/1/2030	High	\$ 1,704			\$ 2,600	
9600 Autumn Leaf Way	Reno	89506 North Valleys	4/2.5	2080	SFH	\$ 132,000			435,100	11/20/2009	412	NSP1	120%	11/20/2029	High	\$ 1,704				
9624 Autumn Leaf Way	Reno	89506 North Valleys	4/2	1642	SFH	\$ 115,443			409,300	9/17/2009	412	NSP1	120%	9/17/2029	High	\$ 1,704				
9735 Meadow Star Dr	Reno	89506 North Valleys	3/2	1276	SFH	\$ 92,000			364,000	2/12/2010	412	NSP1	120%	2/12/2030	High	\$ 1,545				
9930 Crystalline Dr	Reno	89506 North Valleys	3/2	1361	SFH	\$ 116,700			384,500	3/8/2011	412	NSP1	120%	3/8/2031	High	\$ 1,545				
1460 Oliver Ave	Reno	89512 Central Reno W 395	3/2	1220	SFH	\$ 45,000			295,600	3/20/2009	508	NSP2	80%	3/20/2029	Low	\$ 1,214				
1900 Montello St	Reno	89512 Central Reno W 395	3/2	1220	SFH	\$ 45,000	\$ 164,383		352,500	2/23/2009	508	NSP2	80%	2/23/2029	Low	\$ 1,214				
1939 Bishop St	Reno	89512 Central Reno W 395	3/1	1011	SFH	\$ 100,000			290,200	11/25/2008	508	NSP2	80%	11/25/2028	Low	\$ 1,214		ę	\$ 14,000	
2000 Silverada Blvd #1012	Reno	89512 Central Reno E 395/Sparks	2/1	828	Condo	\$ 45,460			226,500	4/28/2011	508	NSP2	80%	4/28/2031	Low	\$ 1,051		4		
100 E. Richards Wy	Sparks	89431 Central Reno E 395/Sparks	3/2	1350	SFH	\$ 130,000				8/19/2010	750	NSP2	50%	10/21/2031	Low	\$ 2,253	PBM	X \$	\$ 9,100	
10020 Grosse Point Ct	Reno	89506 North Valleys	3/2	1419	SFH	\$ 129,900				8/19/2010	750	NSP2	50%	1/1/2031	Low	\$ 2,253	PBM	Х		
10021 Purple Sage Dr	Reno	89506 North Valleys	3/2	1173	SFH	\$ 76,500			375,800	9/27/2012	750	NSP2	50%	4/26/2033	Low	\$ 1,214		\vdash		
1091 Shadelands Ct	Reno	89523 West and South Reno	3/2	1270	SFH	\$ 158,194			451,600	12/20/2013	750	NSP2	50%	5/30/2034	Low	\$ 1,214	DD1.4	V		
11010 Skylight Ct	Reno	89506 North Valleys	4/2	1530	SFH	\$ 129,900			408,000	10/26/2010	750	NSP2	50%	6/1/2032	Low	\$ 2,700	PBM	Х		
1162 Calvados Dr	Sparks	89434 Central Reno E 395/Sparks 89506 North Valleys	4/2 3/2	1403 1440	SFH SHF	\$ 133,500 \$ 160,682			394,300	6/30/2010 12/11/2013	750 750	NSP2 NSP2	50% 50%	7/1/2031 4/16/1934	Low	\$ 1,355 \$ 1,214		++		
11665 Camel Rock Dr 11705 Claim Stake Dr	Reno Reno	89506 North Valleys 89506 North Valleys	4/3	1292	SFH	\$ 160,682 \$ 103,000			385,400	5/30/2013	750 750	NSP2 NSP2	50%	12/13/2033	Low	\$ 1,214	PBM	X		
11895 Desert Blo0m Dr	Reno	89506 North Valleys	3/2	1292	SFH	\$ 103,000			380,800	2/23/2011	750	NSP2 NSP2	50%	8/17/2031	Low	\$ 2,700	PDIVI			
1277 Express St	Sparks	89434 Central Reno E 395/Sparks	3/2	1292	SFH	\$ 107,242			380,800	7/28/2010	750	NSP2 NSP2	50%	4/1/2031	Low	\$ 1,214	PBS	X		
1631 Burnside Dr	Sparks	89434 Central Reno E 395/Sparks	3/2	1376	SFH	\$ 117,300				2/13/2012	750	NSP2	50%	8/28/2032	Low	\$ 2,233	1 03			
1681 Burnside Dr	Sparks	89434 Central Reno E 395/Sparks	3/2	1250	SFH	\$ 124,900				1/7/2011	750	NSP2 NSP2	50%	7/27/2031	Low	\$ 1,214				
1710 Ashley Park Ct	Sparks	89431 Central Reno E 395/Sparks	3/2.5	1270	SFH	\$ 126,720			391,300	11/7/2013	750	NSP2	50%	3/28/1934	Low	\$ 1,214				
1865 Bishop St	Reno	89512 Central Reno W 395	3/2	1306	SFH	\$ 80,000			313,100	4/6/2010	750	NSP2	50%	9/1/1931	Low	\$ 1,214				
1982 Union St	Sparks	89434 Central Reno E 395/Sparks	3/2	1250	SFH	\$ 133,650	\$ 31,467			9/10/2010	750	NSP2	50%	4/16/2031	Low	\$ 1,214	PMS	Х		
2000 Silverada Blvd #1022	Reno	89512 Central Reno E 395/Sparks	2/1	828	Condo	\$ 49,900			255,600	4/28/2010	750	NSP2	50%	8/26/2030	Low	\$ 1,051				
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Address	City	Zip	Neighborhood	Bedroom Size	Square Footage	SFH or Condo	Purchase Price	Rehab Cost	Total Initial Investment	Current Zillow Value	Date Purchased	RHA Fund Number Source	Funding Source	Income Restrictions as % of AMI	Affordability Period Expiration	Rent Limit (HOME, etc.)	Max Rent Based on HOME, PBV or LIHTC Regs	PBAGE :		11 Estimated Capital Needs n next ~5 years
215 E. Lincoln Wy	Sparks	89431	Central Reno E 395/Sparks	3/2	1347	SFH	\$ 104,343	\$ 45,753	\$ 150,096	\$ 364,300	5/11/2010	750	NSP2	50%	4/1/2031	Low	\$ 1,214			
2395 Melody Ln	Reno	89512	Central Reno E 395/Sparks	3/2	1449	SFH	\$ 112,000	\$ 17,984	\$ 129,984	\$ 401,600	10/12/2010	750	NSP2	50%	5/27/2031	Low	\$ 1,214			
24 E. Devere Wy	Sparks		Central Reno E 395/Sparks	3/2	1344	SFH	\$ 106,900	\$ 33,347	\$ 140,247	\$ 362,600	9/8/2010	750	NSP2	50%	5/13/2031	Low	\$ 1,214	DDM4	V (¢ 12.000
2411 Sunny Slope Dr #4 2435 Sycamore Glen Dr #7	Sparks Sparks	89434 89434	Central Reno E 395/Sparks Central Reno E 395/Sparks	2/2	918 917	Townhouse Townhouse	\$ 94,541 \$ 67,000	\$ 3,517 \$ 24,647	\$ 98,058 \$ 91,647	\$ 290,700 \$ 253,772	1/23/2014 7/31/2013	750 750	NSP2 NSP2	50% 50%	4/2/2034 1/31/2034	Low	\$ 1,051 \$ 1,051	PBM	X 5	\$ 13,000 \$ 6,600
2506 Sunny Slope Dr #1	Sparks	89434	Central Reno E 395/Sparks	2/1.5	1090	Townhouse	\$ 72,500	\$ 24,337	\$ 96,837	\$ 275,800	12/26/2013	750	NSP2	50%	6/19/2034	Low	\$ 1,051	PBM	X S	\$ 6,600
2631 Sunny Slope Dr #5	Sparks	89434	Central Reno E 395/Sparks	2/2	824	Townhouse	\$ 88,500		\$ 119,411	\$ 244,400	4/11/2014	750	NSP2	50%	7/4/2034	Low	\$ 1,051			\$ 6,600
281 McGoldrick Wy	Sparks	89431	Central Reno E 395/Sparks	3/2 2/2.5	1203 1259	SFH	\$ 107,900 \$ 133,000	\$ 48,361 \$ 28,870	\$ 156,261 \$ 161,870	\$ 345,700	11/29/2010	750 750	NSP2	50%	10/1/2031	Low	\$ 1,214 \$ 1,585	PBM	V	
2875 Idlewild Dr #59 321 Andrew Cahill Dr	Reno Reno	89511 89503	West and South Reno Central Reno W 395	3/2	1302	Townhouse Townhouse	\$ 133,000	\$ 28,870	\$ 161,870	\$ 377,000 \$ 345,000	9/26/2013 11/30/2015	750	NSP2 NSP2	50% 50%	3/10/2034 11/30/2035	Low	\$ 1,585	PRIVI	X	
321 Devere Wy	Sparks	89431	Central Reno E 395/Sparks	3/2	1328	SFH	\$ 77,623	\$ 113,530	\$ 191,153	\$ 364,800	9/17/2010	750	NSP2	50%	10/22/2031	Low	\$ 1,214			
530 E. Patriot Blvd #369	Reno	89511	West and South Reno	2/2	887	Condo	\$ 69,294	\$ 39,200	\$ 108,494	\$ 278,136	8/1/2013	750	NSP2	50%	8/1/2033	Low	\$ 1,585	PBM	Х	
55 Galleron Wy 5510 Hurricane Ct	Sparks	89431	Central Reno E 395/Sparks	3/2 3/2	1120 1064	SFH SFH	\$ 99,500 \$ 141,000	\$ 36,579 \$ 35,702	\$ 136,079 \$ 176,702	\$ 346,400 \$ 347,300	9/15/2010 2/28/2014	750 750	NSP2 NSP2	50% 50%	7/15/1931 8/11/2034	Low	\$ 1,214 \$ 2,253	PBS	X	
5547 Thorn Berry Ct	Sun Valley Sun Valley	89512 89433	North Sun Valley/Spanish Springs North Sun Valley/Spanish Springs	3/2	1105	SFH	\$ 113,850	\$ 33,702	\$ 176,702	\$ 346,500	9/2/2010	750	NSP2	50%	11/4/2030	Low	\$ 2,233	PD3	^	
555 Patriot Blvd #232	Reno	89511	West and South Reno	2/2	835	Condo	\$ 66,500	\$ 22,494	\$ 88,994	\$ 285,250	9/20/2013	750	NSP2	50%	5/21/2034	Low	\$ 1,585	PBM	Х	
5581 Diablo Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1696	SFH	\$ 135,600	\$ 14,315	\$ 149,915	\$ 401,800	9/23/2010	750	NSP2	50%	4/14/2031	Low	\$ 1,214		;	\$ 4,600
5665 Cranberry Ct 5702 Avalanche Ct	Sun Valley Sun Valley	89433 89433	North Sun Valley/Spanish Springs North Sun Valley/Spanish Springs	3/2 3/2	1144 1304	SFH SFH	\$ 125,000 \$ 118,800	\$ 52,448 \$ 32,856	\$ 177,448 \$ 151,656	\$ 353,800 \$ 357,900	12/30/2013 8/6/2010	750 750	NSP2 NSP2	50% 50%	8/21/2034 5/5/2031	Low	\$ 2,253 \$ 1,214	PBS	Х	
5704 Avalanche Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1064	SFH	\$ 113,000	\$ 29,502	\$ 142,502	\$ 337,800	8/27/2010	750	NSP2	50%	8/26/2031	Low	\$ 1,214			\$ 9,500
5848 Magenta Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1696	SFH	\$ 142,000	\$ 30,807	\$ 172,807	\$ 405,400	6/3/2010	750	NSP2	50%	11/1/2030	Low	\$ 1,214			
6070 Ingleston Dr #1122	Sparks	89436	North Sun Valley/Spanish Springs	2/2	1330	Condo	\$ 145,900	\$ 12,482	\$ 158,382	\$ 333,700	9/5/2014	750	NSP2	50%	10/30/2034	Low	\$ 1,585	PBM	Х	
6070 Ingleston Dr #1126 6240 W. Crow Ct	Sparks Sun Valley	89436 89433	North Sun Valley/Spanish Springs	2/2 3/2	1156 1505	Condo SFH	\$ 141,900 \$ 109,900	\$ 15,230 \$ 31,999	\$ 157,130 \$ 141,899	\$ 318,400 \$ 379,800	9/5/2014 9/28/2010	750 750	NSP2 NSP2	50% 50%	11/20/2034 7/29/2031	Low	\$ 1,585 \$ 1,214	PBM	X :	\$ 4,600
6320 E. Cree Ct	Sun Valley		North Sun Valley/Spanish Springs North Sun Valley/Spanish Springs	3/2	1185	SFH	\$ 109,900	\$ 26,964	\$ 138,834	\$ 374,500	7/30/2010	750	NSP2	50%	5/1/2031	Low	\$ 1,214			
6365 Zuni Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1161	SFH	\$ 113,850	\$ 24,236	\$ 138,086	\$ 376,200	6/17/2010	750	NSP2	50%	9/15/2030	Low	\$ 1,214			
6385 Zuni Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1345	SFH	\$ 110,000	\$ 24,982	\$ 134,982	\$ 367,500	11/19/2010	750	NSP2	50%	7/29/2031	Low	\$ 1,214			
6410 Mic Mac Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1696	SFH	\$ 130,000	\$ 24,972	\$ 154,972	\$ 394,400	12/14/2010	750	NSP2	50%	8/6/2031	Low	\$ 1,214	DDC		\$ 5,100
6410 Zuni Ct 6464 Eskimo Dr	Sun Valley Sun Valley	89433 89433	North Sun Valley/Spanish Springs North Sun Valley/Spanish Springs	3/2 3/2	1345 1185	SFH SFH	\$ 125,000 \$ 109,000	\$ 29,974 \$ 34,082	\$ 154,974 \$ 143,082	\$ 377,000 \$ 358,800	11/1/2010 6/30/2010	750 750	NSP2 NSP2	50% 50%	5/5/2031 7/15/2031	Low	\$ 1,214 \$ 1,214	PBS	Х	
6525 Oglala Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1185	SFH	\$ 102,000	\$ 24,223	\$ 126,223	\$ 355,300	12/9/2010	750	NSP2	50%	8/6/2031	Low	\$ 1,214			
6540 Oglala Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1304	SFH	\$ 145,000	\$ 33,007	\$ 178,007	\$ 371,300	5/9/2014	750	NSP2	50%	9/26/2034	Low	\$ 1,214			
670 Lyyski St	Sparks	89431	Central Reno E 395/Sparks	3/2 3/2	1347	SFH SFH	\$ 122,000	\$ 35,354 \$ 20,391	\$ 157,354 \$ 141,391	\$ 367,400	6/25/2010	750	NSP2	50%	11/1/2030	Low	\$ 1,214 \$ 1,214			
6942 Chorale Ct 6949 Chorale Ct	Sun Valley Sun Valley	89433 89433	North Sun Valley/Spanish Springs North Sun Valley/Spanish Springs	3/2	1265 1185	SFH SFH	\$ 121,000 \$ 110,000	\$ 25,555	\$ 135,555	\$ 365,800 \$ 357,200	4/21/2010 8/23/2010	750 750	NSP2 NSP2	50% 50%	9/3/2030 1/1/2031	Low	\$ 1,214			
70 Devere Wy	Sparks	89431	Central Reno E 395/Sparks	3/2	1190	SFH	\$ 74,900	\$ -	\$ 74,900	\$ 340,900	5/18/2012	750	NSP2	50%	3/29/2028	Low	\$ 1,214			\$ 7,000
705 Strauss Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	960	SFH	\$ 99,000	\$ 24,629	\$ 123,629	\$ 346,300	12/16/2010	750	NSP2	50%	8/21/2031	Low	\$ 1,214			
7069 Beethoven Ct 7118 Fantasia Ct	Sun Valley Sun Valley		North Sun Valley/Spanish Springs North Sun Valley/Spanish Springs	3/2 3/2	1040 960	SFH SFH	\$ 113,000 \$ 91,500	\$ 16,124 \$ 20,098	\$ 129,124 \$ 111,598	\$ 354,000 \$ 333,800	6/25/2010 12/30/2010	750 750	NSP2 NSP2	50% 50%	9/24/2030 9/27/2031	Low	\$ 1,214 \$ 1,214			
7211 Leonardo Ct	Sun Valley		North Sun Valley/Spanish Springs	3/2	1105	SFH	\$ 105,800		\$ 125,000	\$ 367,600	12/8/2010	750	NSP2	50%	9/14/2031	Low	\$ 1,214			
7352 Rubens Ct	Sun Valley		North Sun Valley/Spanish Springs	3/2	904	SFH	\$ 105,600	\$ 22,072	\$ 127,672	\$ 335,800	10/13/2010	750	NSP2	50%	10/27/2031	Low	\$ 1,214			
7353 Rubens Ct	Sun Valley		North Sun Valley/Spanish Springs	3/2	1040	SFH	\$ 113,000	\$ 32,984	\$ 145,984	\$ 342,300	9/24/2010	750	NSP2	50%	9/30/2031	Low	\$ 1,214			
7356 Rubens Ct 7390 Matisse Ct	Sun Valley Sun Valley		North Sun Valley/Spanish Springs North Sun Valley/Spanish Springs	3/2	1696 1040	SFH SFH	\$ 139,000 \$ 126,927	\$ 27,239 \$ 24,181	\$ 166,239 \$ 151,108	\$ 399,300 \$ 348,100	9/10/2010 1/17/2014	750 750	NSP2 NSP2	50% 50%	7/22/2031 7/7/2034	Low	\$ 1,214 \$ 1,214	PBS	Х	
7425 Baroque Ct	Sun Valley		North Sun Valley/Spanish Springs	3/2	1304	SFH	\$ 113,850		\$ 134,377	\$ 368,100	2/11/2011	750	NSP2	50%	8/12/2011	Low	\$ 1,214	FB3	^	
7446 Chagall Dr	Sun Valley		North Sun Valley/Spanish Springs	3/2	1265	SFH	\$ 162,472		\$ 176,497	\$ 372,200	1/10/2014	750	NSP2	50%	6/10/2034	Low	\$ 1,214			
7464 Rodin Ct	Sun Valley		North Sun Valley/Spanish Springs	3/2	1040	SFH	\$ 110,000		\$ 134,183	\$ 361,100	8/10/2010	750	NSP2	50%	2/1/2031	Low	\$ 1,214			
7533 Cezanne Ct 767 Snowdrop Ct	Sun Valley Sun Valley		North Sun Valley/Spanish Springs North Sun Valley/Spanish Springs	3/2 3/2	1265 1304	SFH SFH	\$ 121,770 \$ 121,000		\$ 143,981 \$ 152,018	\$ 366,900 \$ 360,600	9/24/2010 4/12/2010	750 750	NSP2 NSP2	50% 50%	7/8/2031 8/2/2030	Low	\$ 1,214 \$ 1,214			\$ 6,500
780 Summer Dr	Sun Valley		North Sun Valley/Spanish Springs	4/2	1464	SFH	\$ 129,900				9/24/2010	750	NSP2	50%	3/20/2031	Low	\$ 1,355		,	0,300
787 Summer Dr	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1696	SFH	\$ 132,000		\$ 152,213	\$ 311,200	9/30/2010	750	NSP2	50%	3/1/2031	Low	\$ 1,214			
9125 Brown Eagle Wy	Reno	89506	North Valleys	3/2.5	1226	Townhouse	\$ 121,000	\$ 22,740	\$ 143,740	\$ 343,100	10/28/2013	750	NSP2	50%	3/6/2034	Low	\$ 2,253	PBM	Х	
9135 Brown Eagle Wy 9355 Stoney Creek Wy	Reno Reno	89506 89506	North Valleys North Valleys	3/2.5 3/2	1120 1173	Townhouse SFH	\$ 94,545 \$ 102,500	\$ 10,432 \$ 15,943	\$ 104,977 \$ 118,443	\$ 334,800 \$ 364,800	7/20/2009 7/22/2010	750 750	NSP2 NSP2	50% 50%	7/20/2029 1/10/2031	High Low	\$ 1,545 \$ 1,214			\$ 6,600
9385 Stoney Creek Wy	Reno	89506	North Valleys	3/2	1359	SFH	\$ 111,700		\$ 128,734	\$ 376,400	5/14/2010	750	NSP2	50%	9/17/2030	Low	\$ 1,214			0,000
9425 Navajo Ridge Dr	Reno	89506	North Valleys	3/2	1804	SFH	\$ 120,059	\$ 24,166	\$ 144,225	\$ 413,300	11/18/2011	750	NSP2	50%	7/11/2032	Low	\$ 1,214			
9485 Long River Dr	Reno	89506	North Valleys	3/2	1468	SFH	\$ 117,500		\$ 136,791	\$ 378,700	1/24/2011	750	NSP2	50%	8/4/2031	Low	\$ 1,214			
9517 Black Canyon Dr 9520 Black Canyon Dr	Reno Reno	89506 89506	North Valleys North Valleys	3/1 3/1	1011 1011	SFH SFH	\$ 100,000 \$ 100,000		\$ 112,612 \$ 112,612	\$ 375,600 \$ 407,200	11/25/2008 11/25/2008	750 750	NSP2 NSP2	50% 50%	10/1/2031 11/21/2034	Low	\$ 1,214 \$ 1,355			
9560 Brightridge Dr	Reno	89506	North Valleys	3/2	1359	SFH	\$ 115,000		\$ 149,082	\$ 373,900	12/23/2010	750	NSP2	50%	8/20/2031	Low	\$ 1,333			
9590 Stoney Creek Wy	Reno	89506	North Valleys	3/2	1173	SFH	\$ 95,000	\$ 22,557	\$ 117,557	\$ 363,000	12/3/2010	750	NSP2	50%	9/22/2031	Low	\$ 1,214			
9790 Crystalline Dr	Reno	89506	North Valleys	3/2	1569	SFH	\$ 128,443	\$ 36,290	\$ 164,733	\$ 407,000	12/16/2010	750	NSP2	50%	4/19/2032	Low	\$ 1,214			
9841 Crystalline Dr 9940 Moonwalk Ct	Reno Reno	89506 89506	North Valleys North Valleys	3/2 3/2	1361 1530	SFH SFH	\$ 126,000 \$ 122,000	\$ 26,157 \$ 12,181	\$ 152,157 \$ 134,181	\$ 384,400 \$ 391,800	2/16/2010 10/28/2010	750 750	NSP2 NSP2	50% 50%	9/9/2031 10/1/2031	Low	\$ 1,214 \$ 1,214			
9970 Sandhaven Ct	Reno	89506	North Valleys	3/2	1476	SFH	\$ 122,000		\$ 143,692	\$ 403,100	5/17/2010	750	NSP2	50%	1/1/2032	Low	\$ 1,214	PBM	Х	
11775 Lone Desert Dr	Reno	89506	North Valleys	3/2	1416	SFH	\$ 99,490	,	\$ 99,490	\$ 358,800	9/15/2011	753	NSP2	120%	2/22/2027	High	\$ 1,545			
1940 Bishop Street	Reno		Central Reno W 395	3/1	973	SFH	\$ 30,000		\$ 30,000	\$ 289,700	2/2/2012	753	NSP2	120%	4/1/2028	High	\$ 1,545			
295 York Wy	Sparks	89434	Central Reno E 395/Sparks	3/2	1188	SFH	\$ 82,000	\$ 103,761	\$ 185,761	\$ 358,900	9/30/2011	753	NSP2	120%	9/30/2031	Low	\$ 1,214	PBM	Х	

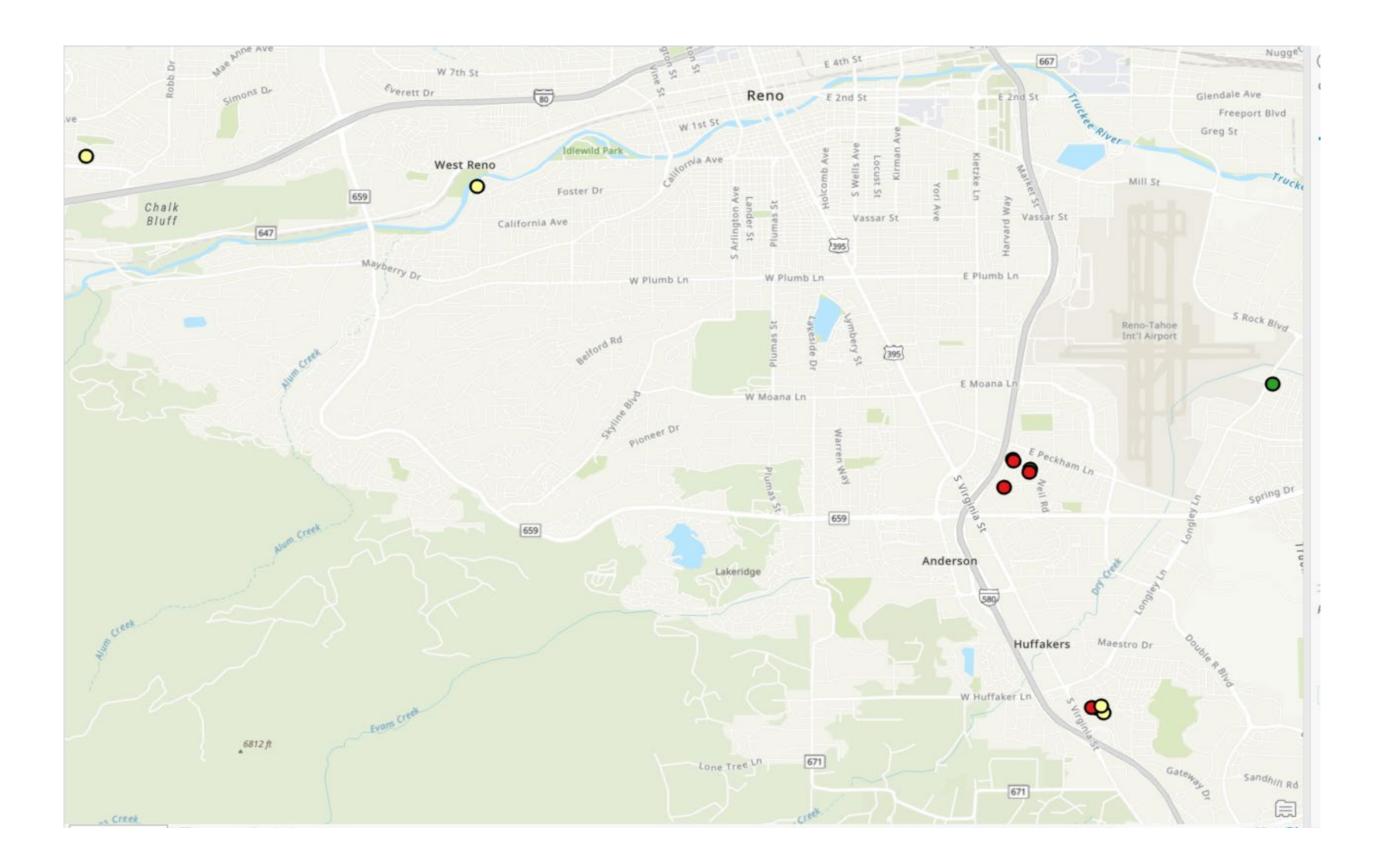
Address	City	Zip	Neighborhood	Bedroom Size	Square Footage	SFH or Condo	Purchase Price	Rel	hab Cost	_	tal Initial vestment	Cur	rent Zillow Value	Date Purchased
3215 Kingsview Ct	Reno	89512	West and South Reno	3/2	1258	SFH	\$ 95,000	\$	-	\$	95,000	\$	378,700	2/21/2012
6440 Coquille Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1105	SFH	\$ 165,000			\$	165,000	\$	358,200	8/4/2014
712 Desert View Dr	Sparks	89434	Central Reno E 395/Sparks	4/2	1830	SFH	\$ 115,000	\$	51,292	\$	166,292	\$	413,600	4/23/2012
9501 Long River Dr	Reno	89506	North Valleys	3/2	1347	SFH	\$ 122,000	\$	35,354	\$	157,354	\$	392,600	6/25/2010
9642 Canyon Meadows Dr	Reno	89506	North Valleys	3/2	1642	SFH	\$ 113,850	\$	20,796	\$	134,646	\$	393,400	2/25/2011
9691 Stoney Creek Wy	Reno	89506	North Valleys	3/2	1476	SFH	\$ 97,888			\$	97,888	\$	387,300	12/15/2011
9979 Moondust Ct	Reno	89506	North Valleys	3/2	1648	SFH	\$ 112,800			\$	112,800	\$	401,200	3/20/2012
11805 Desert Bloom Dr	Reno	89506	North Valleys	4/2	1485	SFH	\$ 130,000	\$	23,710	\$	153,710	\$	420,000	6/25/2010
1925 Bishop St	Reno	89512	Central Reno W 395	3/1	1120	SFH	\$ 8,500	\$	15,766	\$	24,266			7/23/2010
1991 Montello St	Reno	89512	Central Reno W 395	3/2	1064	SFH	\$ 71,500	\$	80,323	\$	151,823	\$	308,700	4/12/2010
2000 Silverada Blvd #111	Reno	89512	Central Reno E 395/Sparks	1/1	654	Condo	\$ 43,000	\$	4,184	\$	47,184	\$	202,900	6/21/2010
2000 Silverada Blvd #122	Reno	89512	Central Reno E 395/Sparks	2/1	828	Condo	\$ 52,500	\$	4,551	\$	57,051	\$	232,300	5/26/2010
2000 Silverada Blvd #214	Reno	89512	Central Reno E 395/Sparks	1/1	654	Condo	\$ 42,000	\$	3,204	\$	45,204	\$	200,800	8/20/2010
2000 Silverada Blvd #324	Reno	89512	Central Reno E 395/Sparks	1/1	654	Condo	\$ 36,000	\$	4,930	\$	40,930	\$	189,400	5/28/2010
2000 Silverada Blvd #823	Reno	89512	Central Reno E 395/Sparks	2/1	828	Condo	\$ 51,900	\$	4,555	\$	56,455	\$	230,800	11/12/2010
5843 Magenta Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1345	SFH	\$ 124,500	\$	17,192	\$	141,692	\$	372,300	3/9/2010
5965 Gardenia Ct	Sun Valley	89433	North Sun Valley/Spanish Springs	3/2	1040	SFH	\$ 106,500	\$	13,110	\$	119,610	\$	352,200	3/9/2010
1390 Oliver Ave	Reno	89512	Central Reno W 395	3/2	1381	SFH	\$ -	\$	4,497	\$	4,497	\$	417,000	5/1/2014
1405 Oliver Ave	Reno	89512	Central Reno W 395	3/2	1381	SFH	\$ -	\$	4,394	\$	4,394	\$	281,000	5/1/2014
1801 Montello St	Reno	89512	Central Reno W 395	3/2	1381	SFH	\$ -	\$	5,217	\$	5,217	\$	450,000	5/1/2014
1540 Oliver Ave	Reno	89512	Central Reno W 395	3/2	1234	SFH	\$ 45,000	\$	170,093	\$	215,093	\$	329,500	12/9/2009
1830 Helena Ave	Reno	89512	Central Reno W 395	3/2	1296	SFH	\$ 90,000	\$	63,372	\$	153,372	\$	288,600	7/19/2010
1865 Montello St	Reno	89512	Central Reno W 395	3/2	1220	SFH	\$ 53,000	\$	175,668	\$	228,668	\$	399,300	6/10/2010
1948 Citron St	Reno	89512	Central Reno W 395	2/1	1016	SFH	\$ 107,500	\$	18,043	\$	125,543	\$	282,000	3/29/2009
1955 Citron St	Reno	89512	Central Reno W 395	2/1	680	SFH	\$ 98,500	\$	29,751	\$	128,251	\$	232,900	2/16/2010
1956 Citron St	Reno	89512	Central Reno W 395	2/1	1080	SFH	\$ 59,000	\$	54,809	\$	113,809	\$	268,300	5/14/2009
1960 Helena Ave	Reno	89512	Central Reno W 395	3/2	1296	SFH	\$ 90,000	\$	63,372	\$	153,372	\$	293,800	7/19/2010
1964 Citron St	Reno	889512	Central Reno W 395	5/2	1316	SFH	\$ 109,000	\$	27,655	\$	136,655	\$	411,000	10/29/2009
1995 Helena Ave	Reno	89512	Central Reno W 395	3/2	1184	SFH	\$ 107,500	Ś	50,381	\$	157,881	Ś	428,500	5/29/2009

RHA Fund Number	Funding Source	Income Restrictions as %	Affordability Period	Rent Limit (HOME, etc.)	Max Rent Based on HOME, PBV or LIHTC Regs		PBQGe 2	29 6BV f 3 Being	01 Es Capi	timated ital Needs
Source	Source	of AMI	Expiration	(HOIVIE, etc.)			Assigned	Used	In ne	xt ~5 years
753	NSP2	120%	8/13/2027	High	\$	1,344			\$	12,500
753	NSP2	120%	5/2/2027	High	\$	1,545				
753	NSP2	120%	12/7/2027	Low	\$	1,355				
753	NSP2	120%	11/5/2027	High	\$	1,545				
753	NSP2	120%	10/7/2026	High	\$	1,545				
753	NSP2	120%	4/1/2027	High	\$	1,545				
753	NSP2	120%	9/11/2027	High	\$	1,545				
350	NSP2/RHA	80%	6/25/2030	Low	\$	1,355				
350	NSP2/RHA	80%	7/23/2030	Low	\$	1,214				
350	NSP2/RHA	80%	4/12/2030	Low	\$	1,214				
350	NSP2/RHA	80%	6/21/2030	Low	\$	876				
350	NSP2/RHA	80%	5/26/2030	Low	\$	1,051				
350	NSP2/RHA	80%	8/20/2030	Low	\$	876				
350	NSP2/RHA	80%	5/28/2030	Low	\$	876				
350	NSP2/RHA	80%	11/12/2030	Low	\$	1,051				
350	NSP2/RHA	80%	3/9/2030	Low	\$	1,214				
350	NSP2/RHA	80%	3/9/2030	Low	\$	1,214				
416	NSP3	40%	5/1/2034	Low	\$	1,214				
416	NSP3	40%	5/1/2034	Low	\$	1,214	PBS	Χ		
416	NSP3	40%	5/1/2034	Low	\$	1,214	PBS	Χ		
410	OM HOME	50%		Low	\$	1,214				
410	OM HOME	50%		Low	\$	1,214				
410	OM HOME	50%		Low	\$	1,214				
410	OM HOME	50%		Low	\$	1,051				
410	OM HOME	50%		Low	\$	1,051				
410	OM HOME	50%		Low	\$	1,051				
410	ОМ НОМЕ	50%		Low	\$	1,214			\$	9,600
410	OM HOME	50%		Low	\$	1,495				
410	ОМ НОМЕ	50%		Low	\$	1,214				
									\$	212,100

\$ 20,811,318 \$ 56,786,308 \$ 212,100

RHA Fund Number	Funding Source	Funding Description	Number of Units	Income Limit	Outside Approval to Sell Needed	Approving Agency
336	921 Sage St	This home was purchased in 2002 and has been used as the Live-in unit for Mineral Manor since then.	1	N/A	No	RHA
350	NSP2 - Million Dollar Homes	RHA agreed to match \$1 million of its own money in the Neighborhood Stabilization Program 2 grant.	10	80%	No	RHA
410	Oliver Montello	The City of Reno received Economic Development Initiative grants to revitalize the Oliver Montello neighborhood. The City contracted with RHA to administer the funds. HOME funds were used for rehabilitation.	9	50%	Yes	City of Reno
411	\$1 Good Neighbor Homes	HUD GNP allows local government agencies to purchase Good Neighbor Program homes (HUD foreclosed homes) for \$1 to reinvest in the local neighborhood and community.	7	80%	No	RHA
412	NSP 1	State of Nevada's federal fiscal recovery funds awarded to WCHC. RHA was the lead agency of the Constortium for these fiscal recovery funds.	22	50-120%	Yes	NV Housing Div./WCHC
414	GNPR - Reinvestment	Funds generated from lease-to-own transasctions were reinvested to purchase foreclosed homes.	15	80%	No	RHA
415	Donated Property	Three properties were purchased using donated funds from Jacobs Entertainment. An additional property was donated to the Authority.	1	80%	No	RHA
416	NSP3	The City of Reno used their NSP3 funds to purchase property in the Oliver Montello neighborhood. Three homes were constructed by the City using these funds and then donated to RHA to rent to families with income at or below 40% AMI.	3	40%	Yes	City of Reno
520	Jacobs Donation	Funds from the donation made to RHA by Jacobs Entertainment were used to purchase three properties. The remainder was used to partially fund WJW.	3	80%	No	RHA

RHA Fund Number	Funding Source	Funding Description	Number of Units	Income Limit	Outside Approval to Sell Needed	Approving Agency
750		As the lease agency of the WCHC, RHA was awarded NSP2 grant funds in the amount of \$20.995 million to purchase and rehab foreclosed homes in census tracts highly impacted by foreclosures.	81	50%	Yes	HUD/WCHC
508	NSP2	The original grant application proposed selling the homes to investors with RHA providing a PBV to support the rents for the investor. No investors were interested in these homes so RHA	4	80%	Yes	HUD/WCHC
753	NSP2	chose to rent them to community members. RHA has placed PBV's on some of these units for special purposes and partneship programs through MTW.	10	120%	Yes	HUD/WCHC



RENO HOUSING AUTHORITY

AGENDA ITEM NUMBER: 17 March 28, 2023

SUBJECT: Discussion and possible action to implement the Board approved \$9,250.00

salary increase relating to Executive Director Lopez' performance evaluation effective March 6, 2023, and the Board approved Cost of Living Adjustment (COLA) based on the April 2023 Consumer Price Index Western Information Office, West Region effective the first full pay period of July 2023. (For

Possible Action

Executive Director RECOMMENDATION: For Possible Action FROM:

RENO HOUSING AUTHORITY

AGENDA ITEM NUMBER: 18 March 28, 2023

SUBJECT: Additional items:

- i) General matters of concern to Board Members regarding matters not appearing on the agenda. (Discussion)
- ii) Reports on conferences and trainings. (Discussion)
- iii) Old and New Business. (Discussion)
- iv) Request for Future Agenda Topics
- i) Schedule of next meeting. The following dates have been scheduled in advance but are subject to change at any time: Tuesday, April 25, 2023; Tuesday, May 23, 2023; and Tuesday, June 27, 2023. (For Possible Action)

FROM: Executive Director RECOMMENDATION: For Possible Action

The next Board meeting will be held Tuesday, April 25, 2023.