

# 5-Year PHA Plan (for All PHAs)

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

OMB No. 2577-0226  
Expires: 02/29/2016

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

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

## A. PHA Information.

A.1 PHA Name: Housing Authority of the City of York PHA Code: PA022

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/01/2021

PHA Plan Submission Type: ☒ 5-Year Plan Submission ☐ Revised 5-Year Plan Submission

**Availability of Information.** In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

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

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

## B. 5-Year Plan. Required for all PHAs completing this form.

B.1 **Mission.** State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years.

The Housing Authority of the City of York a.k.a. York Housing Authority (YHA) provides decent, safe and affordable homes to individuals and families with limited incomes, while constantly working to ensure ongoing meaningful collaborations with community partners; striving for sustainable residences for the future health and well-being of York County.

B.2 **Goals and Objectives for 2021-2026:** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. (*See Attachment A.*)

The annual Agency Plan submission requirement for 2020 was waived by HUD due to the impact of COVID-19.

### 1. Increase the availability of decent, safe, and affordable housing:

- Apply for Choice Neighborhood Planning Grant specifically for the benefit of the seniors and disabled individuals living in the 281 units at Broad Park Manor and the families living in the 72 units in the Wellington community. The Agency's goal, in collaboration with the City of York, is to transform these high-poverty, distressed neighborhoods in Central York City into mixed-income neighborhoods with affordable housing, safe streets, and good schools.
- Apply for additional rental assistance vouchers, subject to their availability and it being economically feasible: 200, primarily for special needs populations such as, but not limited to, individuals or families eligible under the Family Unification Program, the disabled, and the displaced.

**Goals and Objectives. Continued.****1. Increase the availability of decent, safe, and affordable housing: (cont.)**

- C. Retain the level of vouchers currently administered by the YHA, as long as they are funded by HUD.
- D. Retain public housing occupancy at a level of 97.96 % or better.
- E. Collaborate with developers of affordable housing where the housing developed will assist applicants on the YHA Public Housing and/or Housing Choice Voucher Wait Lists.
- F. Assist Creating Opportunities in Neighborhood Environments, Inc. (CONE) in the development of affordable housing by continuing to purchase market rate rental units and to apply for mixed income tax credit applications as other funding opportunities arise in the County and City. Examples: Thackston Phase II and the 9% tax credit application in March 2021 for 50 additional single units located at the historical Pleasant Acres Annex in East York.
- G. In 2020, submitted the demolition/disposition requirements to HUD as part of the process of researching funding and application requirements with Michaels Organization, a local developer, to reposition the 32 public housing units currently known as Parkway Homes to 50 tax credit units under Rental Assistance Demonstration (RAD).
- H. Continue to pursue opportunities to expand YHA housing programs to provide transitional housing, housing for the disabled, and affordable assisted living.
- I. Develop a preference in PH for veterans who have been honorably discharged, capped at 10% (15/year). Thackston Phase II Development is actively being considered.
- J. Thackston Phase II Development is successfully underway.
- K. Began a partnership with City of York to apply for the Choice Neighborhood Planning Grant which will benefit Broad Park Manor, Wellington and Turnkey units in the east end of York City.
- L. Continue to administer 23 HUD-VASH Vouchers with the Lebanon VA.
- M. Continue to administer 68 Mainstream Vouchers with the local community as a result of the successful application in 2019.
- N. Continue to administer 19 Family Unification Program Vouchers.
- O. Continue to administer 45 Single Room Vouchers with Dutch Kitchen and YMCA in York City.
- P. Continue to administer 45 MOD Rehab Vouchers in York City and York County.
- Q. Continue to administer 101 Project Based Vouchers, which includes 25 new PBVs at State Street Apartments in 2020.

**2. Improve the Quality of Assisted Housing:**

- A. Improve Public Housing Assessment System (PHAS) score to 90% or better.
- B. Improve Section 8 Management Assessment Program to a score of 90% or better.
- C. Improve Customer Satisfaction and Communication.
- D. Concentrate efforts to improve specific management functions.
  - 1. Improve efficiencies and maintain/improve administrative technical support by upgrading hardware and software as needed.
  - 2. Continue staff training on applicable regulations, management skills, technical skills, maintenance, capital needs as they become available and as needed.
  - 3. Improve average turnaround time to 20 days for Asset Management Projects (AMPs) with a site-based wait list and to 25 days for AMPs that do not have a site-based wait list. Increased to 52 days due to impact of COVID-19.
  - 4. Reduce Tenant Accounts Receivable, including amount owed after move-out, to a quarterly average of 5% at each AMP.
  - 5. Maintain AMP occupancy at 98% or better.
  - 6. As required under all programs the Authority administers, update policies and procedures to comply with regulations and laws in a timely and effective manner.
- E. Renovate and/or modernize public housing units in accordance with capital needs, subject to availability of funds and in compliance with safety requirements.
  - 1. 2018-2019 - New elevators installed in Broad Park Manor and upgraded mechanicals in all senior high rises.
  - 2. 2019 - New windows installed at Wellington.
  - 3. 2020 – Installed cameras at Broad Park Manor and other sites.
- F. Adopt policy and procedures that improve the overall efficiency of the programs while being mindful of the reduction in funding and increased expenses yet still striving to meet the needs of the clients we serve.
- G. In management agent capacity, work with owners to improve the quality and energy efficiency of units.

**B.2 Goals and Objectives. Continued.**

2. Improve the Quality of Assisted Housing: (cont.)

- H. Continue to pursue Green Initiatives such as battery and water recycling, utilizing energy efficient light bulbs, supporting resident gardens, and the urban farming initiative by Fresh Foods Farms of York. Installing new water efficient toilets in Broad Park Manor and eventually throughout all public housing units.
- I. Deputy Executive Director is YHA in-house counsel and handles all appeals. YHA also has two legal services.
- J. Submitted application for disposition/demolition of Codorus Homes. Applied to HUD in Fall 2020 for fully-funded tax credit units to be known as Thackston Phase II, anticipating approval in 1QA2021.
- K. In 2021, 13-15 scattered site units, identified as historical sites, will require significant improvements.
- L. 2021 – Will submit 9% tax credit application for 50 additional units at Pleasant Acres.

3. Increase Assisted Housing Choices:

- A. Provide Voucher mobility counseling as requested: Pre-counsel all voucher holders. Provide additional counseling for those expressing a need to move to areas of opportunity. Work with service providers to assist clients.
- B. Conduct outreach efforts to potential voucher property owners/landlords: Maintain or increase existing level of landlord participation. Targeting outreach to areas of York County where participation is limited.
- C. Increase voucher payment standards, as needed, in accordance with regulations. Monitor annually, at minimum.
- D. Seek out funding to create an enhanced housing training and counseling program for prospective renters and buyers; including financial literacy within the curriculum.
- E. Converting public housing to vouchers under RAD, if determined appropriate, by AMP. Ongoing analysis at least twice during 5-year plan period. (*See Attachment C.*)
- F. Collaborate with public and private partners in an effort to increase homeownership in the City and County of York by households with incomes between 60% and 120% of area median income.
- G. County rents are higher in areas of opportunity in York County while City payment standards are lower.
- H. HUD Mainstream Grant – actively working with local agencies to lease up Mainstream Vouchers to eligible applicants.

4. Improve Community Quality of Life and Economic Vitality:

- A. Implement measures to de-concentrate poverty by leasing to higher income public housing households.
- B. Implement public housing security improvements:
  - 1. Monitor all sites on an ongoing basis for needed physical security improvements.
  - 2. Complete improvements, subject to funding availability.
  - 3. Apply for grants and subsidies to support safety and security of all YHA sites.
  - 4. Provide camera monitoring in “at-risk” sites.
  - 5. Communicate and work with Resident Advisory Board to improve security at all Authority-owned locations.
- C. Collaborate with agencies/service providers to improve the quality of life in all communities within and surrounding our public housing developments.
  - 1. Unite with Healthy York County Coalition and share best practices with staff and residents.
  - 2. Ongoing partnership with Fresh Foods Farm of York in accordance with our agreement signed in March 2016 and successfully increasing the availability of fresh, locally grown food to York City residents.
  - 3. Provide 2 full-time social services professionals who work directly with local agencies on behalf of the needs of our senior residents.
  - 4. Joined with WellSpan in 2019 to monitor and obtain resources to all low income, senior households in a pilot program to determine feasibility to extend referral services to seniors living in Parkway and Wellington communities.
  - 5. Coordinating with York Hospital to provide COVID-19 vaccine mobile clinics at the senior high rises.
  - 6. Supporting the efforts of White Rose Senior Center and local churches for daytime social needs, food distribution, etc.
  - 7. Counterpart with Central PA Food Bank for regularly scheduled, on-going food distribution programs at the White Rose Senior Center and all other senior high rises (Fairmont, Springfield and Stony Brook).
- D. Accommodate transfer needs of residents due to change in household composition. With a goal of transferring 15 public housing resident households over five years (3 per year). In 2020, due to COVID-19 restrictions completed 10 transfers.
- E. 2020 - Increased county payment standards.
- F. Effective 2020, converted from FYE September 30 to FYE December 31, as approved by HUD in 2019.

B.2	<p><b>Goals and Objectives. Continued.</b></p> <p><u>4. Improve Community Quality of Life and Economic Vitality: (cont.)</u></p> <p>G. Internet Distribution Agreement and installation of antennas on the roof of Broad Park Manor, which will provide wireless internet service for the residents of Broad Park Manor and the local community. The second phase will install antennas on the roof of the Jefferson Center to provide wireless internet service for the residents of Parkway family development and that surrounding area.</p> <p>H. YHA signed an agreement with Comcast in May 2020 for Internet Essentials and YHA paid up to 6 months of resident requested internet service starting in June 2020.</p> <p><u>5. Promote self-sufficiency and asset development of families and individuals:</u></p> <p>A. Increase the number of employed adult leaseholders: in 2019: 24 public housing leaseholders and 34 Section 8 participants; in 2020-2021: 28 public housing leaseholders and 42 Section 8 participants.</p> <p>B. Continue to administer the Family Self-Sufficiency Program for Section 8 and Public Housing, and if financially feasible, increase from 5 slots to 10, if funding permits.</p> <p>C. Provide and/or attract supportive services to improve program participants' employability, such as, but not limited to assistance with transportation and childcare.</p> <p>D. Provide and/or attract supportive services to increase independence for the elderly and/or families with disabilities: Collaborate with local agencies in the provision of services and pursue new funding to enhance current social service programming.</p> <p><u>6. Ensure Equal Opportunity in Program Delivery:</u></p> <p>A. Undertake affirmative measures, including providing education to landlords, residents and YHA staff, to ensure access to assisted housing and provide a suitable living environment for families living in assisted housing, regardless of race, sex, color, religion, disability, familial status, sexual orientation or national origin.</p> <p>B. Undertake affirmative measures to ensure accessible housing to persons with all disabilities regardless of unit size required.</p> <p>C. Adopt an Affirmatively Fair Housing Marketing Plan.</p> <p>D. Provide Language Assistance throughout program administration with staff and other local resources.</p> <p>E. Working with state agencies to enhance quality of life while aging in place.</p> <p>F. Working with local agencies and providers for equal access to VASH and Mainstream Vouchers.</p>
B.3	<p><b><u>Progress Report:</u></b></p> <p><b><u>PHA Plan Update – Annual Plan for 01-01-2021 through 12-31-2021</u></b></p> <p>Identify all PHA Plan elements that have been or are proposed to be revised by the PHA since its last Annual Plan submission: This update states what the Authority wishes to modify/accomplish in the year 01-01-2021 through 12-31-2021. See Public Housing Admission and Occupancy Policy and Section 8 Administrative Plan for full detail of existing policies.</p> <p><b>1. Eligibility, Selection and Admission Policies, Including De-concentration and Wait List Procedures:</b></p> <p><b>a. <u>Public Housing Program:</u></b></p> <p>i. Phase II Demolition, disposition and redevelopment of Codorus (AMP1) submitted to HUD.</p> <p>ii. Amend Public Housing Admission and Occupancy Policy to amend transfer policy that will require an occupancy transfer to be made within the AMP the resident lives in, or if no units exist that meet the resident's occupancy need, to the AMP that is geographically closest to the home they live in prior to the transfer.</p> <p>iii. Continue to assess the need to remove the current York County residency preference for Northern York County. Implement based on assessment.</p> <p>iv. Assess the Public Housing waiting lists on an ongoing basis to determine need to open or close waiting lists based on demand.</p> <p>v. Purge the Public Housing Wait list – completed.</p> <p>vi. Removed preference for non-subsidized housing applicants.</p>

**1. Eligibility, Selection and Admission Policies, Including De-concentration and Wait List Procedures (Cont.)****b. Housing Choice Voucher Program:**

- i. Continue to promote the Section 8 Homeownership Program
- ii. Continue to work on improving communications with clients and landlords, reply within 48 hours.
- iii. 2018 - Changed voucher bedroom size requirements to Head of Household, Spouse and Co-Head to receive one bedroom and remaining members will remain at a minimum of two (2) persons per bedroom.
- iv. Continue to work on agreement with HDC MidAtlantic Corp. to provide Project Based Vouchers at New Freedom Apartments to increase the quality of affordable housing in York County.
- v. Continue to work with Pennrose, LLC to provide 25 Project Based Vouchers at Family Residences tax credit portfolio and increase the quality of affordable housing in York City.

**2. Financial Resources:****Federal Grants – 2021**

i. Public Housing Operating	\$	3,687,418	(CY2020 req less est. 6% proration )
ii. Capital Fund Program – 2021	\$	2,470,026	(2020 actual – 2021 not yet)
iii. Section 8 Program	\$	9,888,461	(CY2020 vouchers, Mod Rehab & SRO)
iv. Section 8/PH FSS Coordinator	\$	69,380	
v. Section 8/Special Needs Assessment Program	\$	142,584	

**Prior Year Funding - unobligated**

i. Capital Funds	\$	3,532,230	Including CFP 2020
ii. ROSS – PH/SEC8 FSS Coordinator Grant	\$	25,878	
iii. Section 8/Special Needs Assessment Grant	\$	0	

<b><u>Public Housing Dwelling Rental Income</u></b>	\$	4,182,736
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<b><u>Public Housing Non-Dwelling Income</u></b>	\$	389,332
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**COCC Non-Federal Sources – Mgmt of non-Public Housing**

Tax Credit Mgmt Fees	\$	104,049
Non-Federal Mkt Rate Housing Revenues	\$	79,358

<b>TOTAL</b>		<b>24,571,452.</b>
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The annual audit for FYE 2020 was conducted for 15 months in March 2020. Major programs that were audited were the Public Housing Program, Section 8 Program, Capital Fund Program, and the Central Office Cost Center. The audit will be submitted to HUD in June, 2021.

**3. Rent Determination: (See Public Housing Admission and Occupancy Policy and Housing Choice Voucher/Section 8 Administrative Plan for full details on current procedures for determining rent.)****a. Public Housing:**

- i. Minimum rent will remain at \$50.00 as permitted by HUD.
- ii. Families may choose between Flat Rent and Income Based Rent, with the ability to adjust annually at the time of recertification.
- iii. Will consider revising rent calculations, in accordance with proposed federal regulations when finalized. Any discretionary policy changes will be available for public review prior to implementation. (See Attachment A).

**3. Rent Determination: (See Public Housing Admission and Occupancy Policy and Housing Choice Voucher/Section 8 Administrative Plan for full details on current procedures for determining rent.) (Cont.)**

b. Housing Choice Voucher (HCV)/Section 8 Program:

- i. Minimum rent will remain at \$50.00, as permitted by HUD.
- ii. Will consider revising rent calculations, in accordance with proposed federal regulations when finalized.
- iii. Will allow family declaration of assets equal to/less than \$5,000.00
- iv. Change voucher bedroom size requirements to a minimum of Head of Household, Spouse, Co-Head to receive 1 bedroom and all remaining members to two (2) persons per bedroom. Pending revision of the admin plan.
- v. Implemented electronic prepaid debit cards for utility allowance in 2019.

**4. Operation and Management:**

a. Public Housing:

- i. Expected Turnover - 112 vs. 137 last year. See Housing Needs Assessment (wait list information) for number by bedroom size.
- ii. Revisions to the Admissions and Continuing Occupancy Plan, and Maintenance Charge List will be made as deemed necessary; and includes late fees, bank fees as charged by the bank, legal and court fees as charged by the court.

b. HCV/Section 8 Program:

- i. Expected Turnover – 135 vouchers during prior 12 months
- ii. Contract Section 8 Housing Quality Standard Inspections and rent reasonableness for units managed by the Housing Authority, if required.
- iii. Annual review of Housing Choice Voucher, Project Based Voucher and Single Room Occupancy waiting lists and purge as deemed necessary

**5. Grievance Procedures:**

The PH grievance procedures will be followed within established timeframes in accordance with program regulations and Fair Housing policies. Deputy Executive Director manages the grievance process, as in- house general counsel, and engages two legal firms as needed.

**6. Community Service and Self-Sufficiency:**

Services and Programs:

Family Self Sufficiency (FSS) Programs and Participation:

Received Notification of Availability of Funds. Will apply for this grant.

Resident Opportunity and Self-Sufficiency (ROSS) Service Coordinators Program:

Received Notification of Availability of Funds. Will apply for this grant.

**7. Safety and Crime Prevention:**

YHA will not apply for the 2021 Safety and Security Grant due to the competitiveness of the grant and the lack of data available to support the application. In recent years, YHA has not experienced high levels of crime. YHA has partnered with York City Police at the Wellington Center for the benefit of YHA youth. The Authority continues to monitor crime and safety concerns in and around the City Public Housing sites since the last annual plan. Local police department has a Confidential TIPS line, which has been shared with residents so that they can report suspected crime and concerns without fear of retaliation. Security cameras have been purchased at both Broad Park Manor and Jefferson Building campuses.

The Agency continues to enforce a defiant no-trespass program in which non-residents must be guests of a resident in order to remain on any YHA property. The goal is to reduce crime and gang activities. YHA continues to improve the curb appeal in all of its neighborhoods.

The Choice Neighborhood Planning Grant application will benefit the seniors and disabled individuals living in the 281 units at Broad Park Manor, as well as the families living in the 72 units in the Wellington community. The Agency's goal, in collaboration with the City of York, is to transform these high-poverty, distressed neighborhoods in Central York City into mixed-income neighborhoods with affordable housing, safe streets, and good schools.

B.3	<p><b>Progress Report (Continued.)</b></p> <p><b>7. Safety and Crime Prevention (Cont.):</b></p> <p>It has been determined that due to crime prevention activities, YHA has not experienced high levels of crime. YHA has partnered with York City Police at the Wellington Center for the benefit of YHA youth. Crime prevention activities include activities targeted to at-risk youth, adults and/or seniors, regular meetings with local police departments and local leadership, police testimony in support of eviction cases, subject to funding availability. Social services provide counseling, support, problem-solving coaching and referrals to families in crisis. Services include a collaborative effort with local leaders, the police department and community programs to develop prevention activities that make our neighborhoods safe.</p> <p><b>8. Pets:</b> There have been no changes to the pet policy to reflect the HUD policy regarding service and support animals. (See HUD No. 13-060A)</p> <p><b>9. Civil Rights Certification:</b> Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations. YHA works with the local jurisdictions to identify any impediments to fair housing choice. YHA will addresses impediments through the resources available and work with the local jurisdictions to implement the jurisdiction's initiatives to further fair housing.</p> <p><b>10. Fiscal Year Audit:</b> The annual audit for FYE 2021 was conducted in March 2020. Major programs audited were the Public Housing Program, Section 8 Program, the Capital Fund Program and the Central Office Cost Center. The final audit will be submitted to HUD in June 2021.</p> <p><b>11. Asset Management:</b> Nine Asset Management Projects (AMPs) are in place, including AMP based budgets, with various levels of management at each AMP. YHA will be reevaluating the current AMP management structure.</p> <p><b>12. Training:</b> Fair Housing Training of all YHA staff by 4Q2019 or 1Q2020, with subsequent Section 8 landlord training thereafter.</p> <p><b>13. Smoke Free Housing:</b> The agency maintains the smoke free housing policy that was implemented in 2013. The policy prohibits smoking within any building or within 25 feet of any entrance, window, or exit of any building.</p> <p>The Housing Authority of the City of York's 5-Year and Annual Agency Plan are available for public inspection at the Authority's administration office: 31 S. Broad Street, York; each management office, the Authority's Social Service Department, and the Authority's website: <a href="http://www.yorkhousingauthority.com">www.yorkhousingauthority.com</a>. An electronic version is also available upon request.</p> <p>Please contact Regina S. Mitchell, Executive Director at (717) 845-2601 for access to these documents plus all policies, procedures and access to regulations that regulate the programs administered by the Authority. The website provides viewers the ability to read all items posted in English and other languages.</p>
B.3	<p><b>Progress Report.</b> Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. <i>See Attachment A.</i></p> <p>(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan. - <u><b>See Attachment A.</b></u></p> <p>(b) For Fiscal Year End 12-31-2021:</p> <p>i. <u><b>Section 8 Program:</b></u></p> <ol style="list-style-type: none"> <li>1. Improve and maintain Section Eight Management Assessment Program (SEMAP) score by addressing concerns in the Corrective Action Plan; training of all staff.</li> <li>2. Averaged at least 96% lease up in the Housing Choice Voucher program.</li> <li>3. Averaged Special Needs Assessments Program (SNAP)/Shelter + Plus Care lease up at twenty (20) for the year.</li> <li>4. Continue to review Housing Choice Voucher Payment Standards and will continue at 95-100% of Fair Market Rents (FMR) for all bedrooms in the City of York and up to 110% for County of York;</li> <li>5. Prepaid debit cards for utility payments are being implemented.</li> </ol>

B.3	<p><b>Progress Report (Continued.)</b></p> <p>For Fiscal Year End 12-31-2021 (Cont.)</p> <p>ii. <u>Public Housing Program:</u></p> <ol style="list-style-type: none"> <li>1. Maintain 98+ % occupancy throughout the year. 97.86 in 2020 due to COVID-19 restrictions.</li> <li>2. Unit turnaround time was at 26 days and we are working to reduce the number of days to 20.</li> <li>3. Retain bilingual employees and continue to utilize other resources to address translation needs of applicants and residents.</li> <li>4. Approved 10 resident household transfers to address reasonable accommodation needs.</li> <li>5. Provided reasonable accommodations to 73households.</li> <li>6. Able to continue rehabilitation and extraordinary maintenance of our properties.</li> <li>7. Continue to certify new staff with concentration on training maintenance on procedures and hands-on training with modern HVAC and electric systems.</li> </ol> <p>iii. <u>Supportive Services:</u></p> <ol style="list-style-type: none"> <li>1. Provide Family Self Sufficiency Programs to guide residents with developing an individualized plan and setting attainable goals to learn about and improve credit scores, education and employment opportunities while the overall economy limits staff's ability to assist residents with attaining homeownership.</li> <li>2. Work cohesively with agencies, partners and resident councils to offer quality of life services such as after-school programming, youth activities, food distribution and locally farmed fresh food, services for the elderly and disabled, mental health services, cultural opportunities, credit/budget counseling, Family Self-Sufficiency Programs. YHA has a social service agreement with SeniorLife.</li> <li>3. Established relationship with FedEx for job placement and employment opportunities.</li> <li>4. Partnered with York City Police at the Wellington Center for the benefit of YHA youth.</li> <li>5. Scouting and 4-H programs are active in the Codorus and Parkway developments.</li> </ol> <p>iv. <u>Creating Opportunities in Neighborhood Environments, Inc. (CONE):</u> Working with CONE toward the development of the Codorus area. Continue collaboration with CONE and YWCA on development in Olde Towne East neighborhood. Continue consideration of future purchases/acquisitions and development opportunities throughout York County.</p>
B.4.	<p><b>Violence Against Women Act (VAWA) Goals.</b> Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>Public Housing and Housing Choice Voucher Programs reflect the National Policy as it relates to the Violence Against Women Act.</p> <p>At this time, the YHA does not directly offer activities, services, or programs to child or adult victims. Various resident related activities may from time to time relate to prevention, intervention or treatment. Access York is the local provider that our staff would refer victims to if they see a need for such referral.</p> <p>In cases where a member of the tenant family is victimized by another member of the household, the victim may remain in the home. If a protection from abuse order is issued against the abuser, the abuser will be required to leave the household.</p>
B.5	<p><b>Significant Amendment or Modification.</b> Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <ol style="list-style-type: none"> <li>i. "Significant Amendments" occur when there are changes to PHA strategies or services (ie: changing rent or admission policies; opening and closing the wait list; changing the designation of demolition or disposition; modifying homeownership programs or reconstruction activities. An example in Public Housing is the administrative change not to require an interim for every increase in income, but rather when there is a change to the income source over and above the current income.</li> <li>ii. "Substantial Deviation Modifications" impact the Capital Fund. Any one item or combination of items that exceeds 20% of the annual amount allocated under the Capital Fund is considered a Substantial Deviation requiring a Significant Amendment.</li> </ol> <p>The York Housing Authority (YHA), PA022, did not have any significant amendment or modification, or substantial deviation modifications, that would require a statement of significant amendment to the CFP Five Year Action Plan based on the Capital Fund Rule. On August 15, 2018, HUD approved the YHA 2018 Agency Plan, which acknowledged future plans for demolition and disposition, Capital Fund Financing and development.</p> <p><u>Project Based Vouchers (PBV):</u> The Authority administers a PBV Program to improve the viability of low-income housing developments to provide affordable housing. The Authority has signed HAP contracts for a total of 15 project based units increased from 75 to 130.</p>



<b>B.6</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y   N</p> <p><input checked="" type="checkbox"/> <u><b>See Attachment B.</b></u></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<b>B.7</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. <u><b>See Attachment C.</b></u></p>

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

### A. PHA Information [24 CFR §903.23\(4\)\(e\)](#)

**A.1** Include the full **PHA Name**, **PHA Code**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

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

### B. 5-Year Plan.

**B.1 Mission.** State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. ([24 CFR §903.6\(a\)\(1\)](#))

**B.2 Goals and Objectives.** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. ([24 CFR §903.6\(b\)\(1\)](#)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA's 5-Year Plan. **See Attachment A.**

**B.3 Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5- Year Plan. ([24 CFR §903.6\(b\)\(2\)](#)). **See Attachment A.**

**B.4 Violence Against Women Act (VAWA) Goals.** Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. ([24 CFR §903.6\(a\)\(3\)](#))

**B.5 Significant Amendment or Modification.** Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. **See Attachment D.**

**B.6 Resident Advisory Board (RAB) comments.** **See Attachment B.**

(a) Did the public or RAB provide comments? No. Due to COVID-19 precautions against gatherings.

(b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. ([24 CFR §903.17\(a\)](#), [24 CFR §903.19](#)).

**B.7 Certification by State or Local Officials.**

Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.. **See Attachment C.**

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

Public reporting burden for this information collection is estimated to average .76 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

# **ATTACHMENT A**

**Goals and Progress Report for**

**01/01/2021 – 12/31/2026**

## ATTACHMENT A

**Progress the HACY has made in meeting the goals and objectives described in the 5-Year Plan (01/01/2021 through 12/31/2026)**

<b>Goal/Strategy: Increase the availability of decent, safe, and affordable housing</b>		<b>Progress:</b>
A	Apply for Choice Neighborhood Planning Grant specifically for the benefit of the seniors and disabled individuals living in the 281 units at Broad Park Manor and the families living in the 72 units in the Wellington community.	The Agency's goal, in collaboration with the City of York, is to transform these high-poverty, distressed neighborhoods in Central York City into mixed-income neighborhoods with affordable housing, safe streets, and good schools.
B	Apply for additional rental assistance vouchers, subject to their availability and it being economically feasible: 200, primarily for special needs populations such as but not limited to individuals or families eligible under the Family Unification Program, the disabled, and displaced.	We will continue to seek additional funding and vouchers that may be available. Currently administering 23 HUD-VASH vouchers with Lebanon VA since April 2018.
C	Retain the level of vouchers currently administered by the YHA, as long as they are funded by HUD.	Retained level of vouchers administered by the YHA.
D	Retain public housing occupancy at a level of 98% or better.	Average occupancy rate for YHA PH Developments is 97.96% - 10/01/2019-12/31/2020.
E	Collaborate with developers of affordable housing where the housing developed will assist applicants on the YHA Public Housing and/or Housing Choice Voucher Wait Lists.	We will continue to collaborate with county and city officials to increase affordable housing in areas of opportunity. We are looking for additional partners to continue this effort. We continue to talk to private developers and York County Economic Alliance to acquire and develop new housing opportunities.
F	Partnership with Creating Opportunities in Neighborhood Environments, Inc. (CONE, Inc.)	Still working with Creating Opportunities in Neighborhood Environments, Inc. (CONE, Inc.) in the development of affordable housing in the City and County utilizing existing housing providers or creating new dwelling units.
G	Research all aspects of converting public housing units to vouchers under Rental Assistance Demonstration (RAD).	In 2020, submitted the demolition/disposition requirements to HUD as part of the process of researching funding and application requirements with Michaels Organization, a local developer, to reposition the 32 public housing units currently known as Parkway
H	Continue to pursue opportunities to expand YHA housing programs to provide transitional housing, housing for the disabled, and affordable assisted living.	A partnership with County-based agencies such as Habitat for Humanity are occurring through NSP3. We continue to work with Center for Independent Living (CIL) and Bell Socialization Services for the potential creation of additional, transitional housing and housing for people with disabilities.

## ATTACHMENT A

**Progress the HACY has made in meeting the goals and objectives described in the 5-Year Plan (01/01/2021 through 12/31/2026)**

<b>(Cont.) Goal/Strategy: Increase the availability of decent, safe, and affordable housing</b>		<b>Progress:</b>
I	Develop a preference in Public Housing for veterans who have been honorably discharged, capped at 10% (15/year)	We continue to research and develop ideas anticipating that HUD will incorporate the preference. Thackston Phase II Development is being considered.
J	New Developments Underway	Thackston Phase II Development and 50 additional single units located at Pleasant Acres Annex are successfully progressing.
K	Choice Neighborhood Planning Grant	Began a partnership with the City of York to apply for the Choice Neighborhood Planning Grant which will benefit Broad Park Manor, Wellington and Turnkey units in the east end of York City.
L	HUD - VASH Vouchers	Continue to administer 23 HUD-VASH vouchers with the Lebanon VA.
M	Mainstream Vouchers	Continue to administer 68 Mainstream Vouchers with the local community as a result of a successful application in 2019.
N	Family Unification Program Vouchers	Continue to administer 19 Family Unification Vouchers.
O	Single Room Occupancy	Continue to administer 50 Single Room Occupancy Vouchers with Dutch Kitchen and YMCA in York City.
P	MOD Rehab Vouchers	Continue to administer 45 MOD Rehab Vouchers in York City and York County.
Q	Project Based Vouchers	Continue to administer 101 Project Based Vouchers, which included 25 new PBVs at State Street Apartments starting in 2020. Future plans include 4 additional PBVs at Sparrows' Way and 8 at Thackston Park Phase II.
<b>Goal/Strategy: Improve the Quality of Assisted Housing</b>		<b>Progress:</b>
A	Maintain quality of public housing management and maintenance: PHAS/REAC scores of 90% or better.	Ongoing.
B	Maintain a Section 8 Management Assessment Program (SEMAP) score of 90% or better, which includes indicators related to housing quality standard requirements and assistance with helping voucher holders find HQS compliant housing.	Ongoing process. Successfully completed a corrective action plan for 2017 SEMAP score of 77%.

## ATTACHMENT A

**Progress the HACY has made in meeting the goals and objectives described in the 5-Year Plan (01/01/2021 through 12/31/2026)**

<b>(Cont.) Goal/Strategy: Improve the Quality of Assisted Housing</b>		<b>Progress:</b>
C	Improve Customer Satisfaction	48 hour responsive customer service, via email and telephone, continues to be emphasized. Ensuring current information on promotional literature and flyers on home sales initiatives. Additional written materials about our programs were developed and made available to the public. Residents are being encouraged to use the updated Resident Applicant Portal and to utilize the document library on the YHA website. Agency website was updated in 2020. Increased use of electronic forms and newly accepted use of DocuSign and ZOOM expedites the signing process in response to the social restrictions caused by COVID-19.
D	Concentrate efforts to improve specific management functions	The Board of Directors engaged Quadel Consulting Corporation to review and update long-standing policies and procedures to make them current with HUD and national standards as well as temporarily managing the team as Acting Section 8 Program Coordinator.
D.1	Improve efficiencies and maintain/improve technical support. Continue to upgrade software and computer systems and provide training.	Contracts on IT security and agency security are ongoing. YHA continues to upgrade software and computer systems in accordance with its IT Plan using an IT consultant. Maintain and improve TenMast WinTen2+ competency after implementation in Fall 2015. TenMast University training courses are available as needed. YHA continues to verify data and confirm information for accuracy and completeness.
D.2	Continue staff training on applicable regulations, management skills, technical skills, maintenance, capital needs.	Various staff attended trainings on fair housing and financial management. All staff attended a poverty simulation and suicide prevention workshop in April 2018. National certification in 2017 for PH and in 2018 for S8 HCV staff, as well as individualized training as staffing changes.
D.3	Improve average turnaround time to 20 days for each Asset Management Project (AMP) with a site-based wait list and 25 days for those that do not.	Focused staff meetings and performance goals on the importance of unit turn time. As a result of COVID-19, average turn time 52 days (10/01/2019-12/31/2020).
D.4	Reduce Tenant Accounts Receivable, which includes amount owed after move-out, to a quarterly average of 5% at each AMP.	YHA consistently meets this goal.

## ATTACHMENT A

**Progress the HACY has made in meeting the goals and objectives described in the 5-Year Plan (01/01/2021 through 12/31/2026)**

<b>(Cont.) Goal/Strategy: Improve the Quality of Assisted Housing</b>		<b>Progress:</b>
D.5	Maintain AMP occupancy at 98% or better.	YHA continues to strive for a minimum of 98% occupancy at all AMPs. As a result of COVID-19, 10/01/2019-12/31/2019: Broad Park Manor 97.86%; City Scattered 100%; Codorus Homes 90%; Codorus Extended 100%; Cottages 100%; County Scattered 95.83%; Fairmont 96.67%; Fairmont Village 96%; Glen Rock 100%; North Beaver 100%; Red Lion 100%; Springfield 100%; Springfield 100%; Stony Brook 97%; Wellington 100%; Wrightsville 95%;
D.6	As required under all programs the Authority administers, update policies and procedures to comply with regulations and laws.	We continue to update all policies and procedures to comply with regulations and laws. In 2020, contracted Quadel to review and update YHA policies and procedures Changed subsidy standards in the HCV Plan.
E	Renovate or modernize public housing units in accordance with capital needs, subject to availability of funds.	As of December 31, 2020 , CFP 2018, CFP 2019, and CFP 2020 are still open. CFP 2016 and CFP 2017 have been fully expended. CFP 2018 is near completion (97% obligated as 12/31/2020).
E.1	Elevators	2018-2019 - New elevators were installed in all three Broad Park Manor highrises, and mechanicals were updated in all other senior highrises
E.2	Windows	2019 - New windows were installed in Wellington.
E.3	Security cameras	2020 - Installed cameras at Broad Park Manor highrises and other sites.
F	Adopt policy and procedures which take into consideration, due to reduction in funding and increased expenses, the overall efficiency of the programs while meeting the needs of the clients we serve.	In 2017, workforce adjustments were made and YHA was restructured in order to reduce operating costs and enhance performance.
G	In management agent capacity, work with owners to improve the quality and energy efficiency of units the Authority manages.	We are monitoring EPC1 and EPC2.

## ATTACHMENT A

**Progress the HACY has made in meeting the goals and objectives described in the 5-Year Plan (01/01/2021 through 12/31/2026)**

<b>(Cont.) Goal/Strategy: Improve the Quality of Assisted Housing</b>		<b>Progress:</b>
H	Continue to pursue Green Initiatives such as battery and water recycling, utilizing energy efficiency of units the Authority manages.	Ongoing.
I	Review and update appeal and hearing officer procedures. Provide training for staff.	Deputy Executive Director is YHA in-house general counsel and manages all appeals by himself or by delegating them to other staff or to two local legal firms.
J.	Submit application for disposition / demolition of Codorus Homes and redevelopment of Thackston Phase II in 2019.	Demolition in process. Successfully submitted application for the development of Homes at Thackston Park II.
K.	Access scattered sites for redevelopment under Rental Assist Demonstration (RAD) or disposition in 2019.	In process.
<b>Goal/Strategy: Increase Assisted Housing Choices</b>		<b>Progress:</b>
A	Provide Voucher mobility counseling: Pre-counsel all voucher holders. Provide additional counseling for those expressing a need. Work with service providers to assist clients.	Develop plan to encourage voucher clients to move to areas of opportunity.
B	Conduct outreach efforts to potential voucher landlords: Maintain or increase existing level of landlord participation. Outreach will be targeted to areas of the County where participation is limited.	Develop plan to reach out to landlords.
C	Increase voucher payment standards, as needed, in accordance with regulations. Monitor annually, at minimum.	Updated the voucher payment standards effective November 1, 2020 based on fair market rent increases effective April 1, 2020.
D	Seek out funding to create an enhanced housing training and counseling program for prospective renters and buyers; including financial literacy	Ongoing process.
E	Convert public housing to vouchers under RAD, if determined appropriate.	In 2020, submitted the demolition/disposition requirements to HUD as part of the process of researching funding and application requirements with Michaels Organization, a local developer, to reposition the 32 public housing units currently known as Parkway Homes to 50 tax credit units under Rental Assistance Demonstration (RAD).

## ATTACHMENT A

**Progress the HACY has made in meeting the goals and objectives described in the 5-Year Plan (01/01/2021 through 12/31/2026)**

<b>(Cont.) Goal/Strategy: Increase Assisted Housing Choices</b>		<b>Progress:</b>
F	Collaborate with public and private partners in an effort to increase homeownership in the City and County of York by households with incomes between 60% and 120% of area median income.	Ongoing process. Continuing acquisition/rehabilitation/resale initiative with CONE. In 2014 and 2015 YHA COCC received 4 donated abandoned properties from Wells Fargo and has undertaken the rehabilitation for eventual lease with option to purchase. As a part of the corrective action plan (CAP) sold one property.
G	HUD Mainstream Grant	Successfully applied to offer Mainstream Voucher Program in 2019. Actively working with local agencies to lease up Mainstream Vouchers to eligible applicants.
<b>Goal/Strategy: Improve Community Quality of Life and Economic Vitality</b>		<b>Progress:</b>
A	Implement measures to de-concentrate poverty by leasing to higher income public housing households in developments occupied with primarily lower income households: increase the number of households with incomes above 60% of area median income by 15% over the existing level of developments with 75 or more units. Where possible, increase should be due to increased earnings of existing residents in their efforts to achieve self-sufficiency.	The Authority continues to work on Family Self-Sufficiency (FSS) by developing an individualized plan with existing residents with personalized goals (ie: employment, education, better job, overcoming language barriers, etc.), and, if needed, establishing YHA escrow accounts to encourage savings.
B	Implement public housing security improvements:	Partnering with York City Police at Wellington Center. Contracts with security services are in place. YHA is utilizing a defiant trespass program with police department in order to reduce crime in and around Authority owned property.
B.1	Monitor all sites on an ongoing basis for needed physical security improvements and apply for applicable grants and subsidies as needed.	YHA submitted grant application to HUD for Emergency Safety and Security for enhanced surveillance in 2015, 2016 and 2017.
B.2	Complete improvements, subject to funding availability.	As of December 31, 2020 , CFP 2018, CFP 2019, and CFP 2020 are still open. CFP 2016 and CFP 2017 have been fully expended. CFP 2018 is near completion (97% obligated as 12/31/2020).
B.3	Apply for grants and subsidies to support safety and security of all YHA sites.	Ongoing.



## ATTACHMENT A

**Progress the HACY has made in meeting the goals and objectives described in the 5-Year Plan (01/01/2021 through 12/31/2026)**

<b>(Cont.) Goal/Strategy: Improve Community Quality of Life and Economic Vitality</b>		<b>Progress:</b>
B.4	Provide camera monitoring at "at-risk" sites.	Ongoing.
B.5	Communicate and work with Resident Advisory Board to improve security at all Authority-owned locations.	Contracts with security services are in place. Staff responds on an on-going basis to tenants regarding safety issues. Communicate and work with Resident Advisory Board to improve security at all Authority-owned locations.
C	Collaborate with agencies/service providers to improve the quality of life in all communities within and surrounding our public housing developments.	A Smoke Free policy is in place creating a healthier community for all. Collaboration with WellSpan have afforded smoking cessation programs for residents. The YHA Social Service department maintains partnerships with many neighboring service providers to improve the quality of life for residents. Some of those partnerships include: WellSpan, Bell Socialization, Salvation Army, York Rescue Mission, SeniorLife, Community Progress Council, PA CareerLink and many more collaborations.
C.1	Healthy York County Coalition	Continue to collaborate with Healthy York County Coalition to share best practices with staff and residents.
C.2	York Fresh Foods Farm	In accordance with the March 2016 agreement, continue to support this ongoing program which provides access to and education about fresh foods grown to York City residents. Successfully increasing the availability of fresh, locally grown food to York City residents.
C.3	Provide 2 full-time social services professionals who work directly with local agencies on behalf of the needs of our senior residents.	Ongoing.
C.4	Collaborate with WellSpan as a local healthcare provider.	Joined with WellSpan in 2019 to monitor and obtain resources to all low income, senior households in a pilot program to determine feasibility to extend referral services to seniors living in Parkway and Wellington communities.

## ATTACHMENT A

**Progress the HACY has made in meeting the goals and objectives described in the 5-Year Plan (01/01/2021 through 12/31/2026)**

<b>(Cont.) Goal/Strategy: Improve Community Quality of Life and Economic Vitality</b>		<b>Progress:</b>
C.5	York Hospital	Coordinating with York Hospital to provide COVID-19 vaccine mobile clinics at the senior high rises.
C.6	White Rose Senior Center	Supporting the efforts of White Rose Senior Center and local churches for daytime social needs, food distribution, etc.
C.7	Central PA Food Bank	Counterpart with Central PA Food Bank for regularly scheduled, on-going food distribution programs at the White Rose Senior Center and all other senior high rises (Fairmont, Springfield and Stony Brook).
D	Accommodate transfer needs of residents due to a change in household composition.	Goal of transferring 15 public housing resident households over five years (3 per year). 10 in 2020 (4 reasonable accommodations and 6 resident moves).
E	Increase county payment standards.	Completed 2020.
F	Change FYE from 09/30 to 12/31.	Approved by HUD Field Office and HUD HQ REAC in 2019.
G	Internet Distribution	Internet distribution agreement and Installation of antennas on roof of Broad Park Manor which provides wireless internet service for residents of Broad Park Manor and the local community was completed. The second phase will install antennas on the roof of the Jefferson Center to provide wireless internet service for the residents of Parkway family development and that surrounding area.
<b>Goal/Strategy: Promote Self-Sufficiency and Asset Development of Families and Individuals</b>		<b>Progress:</b>
A	Increase the number of employed adult leaseholders: increase by 50 public housing leaseholders and 20 Section 8 participants by 9/30/12019.	Increase the number of employed adult leaseholders: increase by 50 public housing leaseholders and 20 Section 8 participants by 9/30/12019.

## ATTACHMENT A

**Progress the HACY has made in meeting the goals and objectives described in the 5-Year Plan (01/01/2021 through 12/31/2026)**

<b>(Cont.) Goal/Strategy: Promote Self-Sufficiency and Asset Development of Families and Individuals</b>		<b>Progress:</b>
B	Continue to administer the Family Self-Sufficiency Program for Section 8 and Public Housing Participants, retaining current level of “slots” for each program and increasing by 5 to 10, if funding permits.	Administered the Family Self Sufficiency programs throughout the 5-year period. At the end of 2019, Public Housing had 24 participants (96%) and Section 8 had 34 participants (85%). From 2014-2019, there were a total of 67 Public Housing residents and 106 Section 8 clients enrolled. From 2014-2019, there were 4 Public Housing graduates and 22 Section 8 graduates, and \$137,476.16 total awards given. One Public Housing resident and one Section 8 client purchased their homes using the awarded funds. 2020-2021 year, with FSS case worker on maternity leave and due to COVID-19, there have been 4 Public Housing and 4 Section 8 enrollees. In 2020, there were three Public Housing graduations totaling \$4,863.27, and so far in 2021, one Section 8 client graduated with \$4,950.21 and is currently in the home buying process. The Authority has various policies in place to enhance the economic and social self-sufficiency of families, such as rent determination policies, admission policies, preference for families working or engaging in training or education programs, Turnkey and HCV Homeownership Program. YHA has a list of resources and agencies where we refer residents for assistance (ie: CareerLINK, HACC, Community Progress Council, FedEx, SpiriTrust). Goal is to reach full capacity in both Public Housing and Section 8, and to add an additional 5 slots for a total of 10 openings, if funding permits and possibly hire another part time or full time FSS case worker if able to apply for a bigger Family Self-Sufficiency Grant.
C	Provide and/or attract supportive services to improve program participants’ employability, such as, but not limited to assistance with transportation and child care.	Continue to provide ongoing programs at the family sites: including, but not limited to budget counseling, Head Start, Lots of Love Early Learning Center, Central PA Food Bank, PA Careerlink, FedEx, Community Progress Council, Lancaster Housing Opportunity Partnership (LHOP), Harrisburg Area Community College (HACC) and Penn State York. Memorandum of Understanding with PA CareerLink.

## ATTACHMENT A

**Progress the HACY has made in meeting the goals and objectives described in the 5-Year Plan (01/01/2021 through 12/31/2026)**

<b>(Cont.) Goal/Strategy: Promote Self-Sufficiency and Asset Development of Families and Individuals</b>		<b>Progress:</b>
D	Provide and/or attract supportive services to increase independence for the elderly and/or families with disabilities; Collaborate with local agencies in the provision of services; Collaborate toward the development of an Assisted Living Facility affordable for individuals with low income.	Ongoing partnerships with York County Coalition on Homelessness, York County Area Agency on Aging, SeniorLife, Center for Independent Living (CIL), Mental Health Services, Salvation Army, White Rose Senior Center, York Rescue Mission, Central PA Food Bank, etc. Continue to operate the ROSS grant agreement to provide funding for one full-time service coordinator.
<b>Goal/Strategy: Ensure Equal Opportunity in Program Delivery</b>		<b>Progress:</b>
A	Undertake affirmative measures to ensure access to assisted housing and provide a suitable living environment for families living in assisted housing, regardless of race, sex, color, age, religion, disability, familial status, sexual	YHA cooperates with both the York City and Pennsylvania State Human Relations Commission. In partnership with the Center for Independent Living (York)..
B	Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.	YHA is committed to fair housing through providing reasonable accommodations.
C	Adopt an Affirmatively Fair Housing Marketing Plan based on deconcentration statistics.	The Authority complies with the Affirmative Fair Housing Marketing Plan and this will be further developed within the ACOP plan.
D	Provide Language Assistance throughout program administration	YHA provides Language Assistance throughout program administration with staff and other local resources.
E	Enhancing quality of life while aging in place.	YHA works with local and state agencies to enhance the quality of life for residents and participants while aging in place.

# **ATTACHMENT B**

**Resident Advisory Board (R.A.B.) Comments**

**Resident Advisory Board (RAB) Comments  
regarding the 2021 YHA Five-Year Agency Plan**

Meetings of the Resident Advisory Board (RAB) members were suspended in March 2020 and have not reconvened due to the Coronavirus (COVID-19) pandemic.

In addition, the annual Agency Plan submission requirement for 2020 was waived by the U.S. Department of Housing and Urban Development (HUD) due to the impact of COVID-19.

The five sections of the draft 2021 Agency Plan follow the standard outline designed by HUD:

- Form HUD-50075-5Y
- Attachment A – Goals and Progress
- Attachment B – Resident Advisory Board (R.A.B.) Comments
- Attachment C – Certifications of Consistency
- Attachment D – Rental Assistance Demonstration (R.A.D.)

The draft 2021 Agency Plan was made public for review and comment via the Agency website [www.yorkhousing.org](http://www.yorkhousing.org). Public notice was published in the York Daily News and York Dispatch which invited the community to participate in a written survey and/or to attend public meetings via ZOOM and telephone at 3:00pm on either June 16, 2021 or June 22, 2021. Pre-registration for the public meetings was required. Printed copies of the survey were available in the YHA Main Office foyer during regular business hours. Surveys were also emailed to partner agencies and available on the Agency website [www.yorkhousing.org](http://www.yorkhousing.org).

Completed surveys were requested by 4:00pm on June 22, 2021, via [rmitchell@yorkhousing.org](mailto:rmitchell@yorkhousing.org), USPS mail or dropped into the secure drop box located at the YHA Main Office 31 S. Broad St., York, PA 17403.

Certificates of Consistency were obtained from the City of York and York County.

The draft 2021 Agency Plan was presented to the YHA Board of Commissioners for approval on June 22, 2021 and was subsequently submitted to HUD. Approval by HUD is anticipated by September 30<sup>th</sup>.

# **ATTACHMENT C**

**Certificates of Consistency**

**Form HUD-50077-SL – County of York**

**Form HUD-50077-SL – City of York**

AWAITING SIGNED  
CERTIFICATIONS OF CONSISTENCY  
CITY OF YORK  
YORK COUNTY



# **ATTACHMENT D**

**Rental Assistance Demonstration**

**(R.A.D.)**

**Attachment D – Rental Assistance Demonstration (RAD)**

The York Housing Authority (YHA) is amending its (annual and/or 5-year) PHA Plan because it is a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the YHA will be converting to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Vouchers the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2012-32, REV-2; and Joint Housing PIH Notice H-2014-09/PIH-2014-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the YHA 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 YHA 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 YHA may also borrow funds to address its capital needs. The YHA may also be contributing Operating Reserves and Capital Funds towards the conversion, in amounts that will be identified in the following years' Annual Plan update.

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

*No unit reconfiguration is planned.*

PIC Number	PROJECT NAME	Public Housing Units	0-BR	1-BR	2-BR	3-BR	4-BR	5+-BR	2021 PUM Capital Fund	Type of Development	Changes to Units
PA022000003	PARKWAY HOMES										
	General Occupancy	253	0	24	118	77	30	4	\$558,690	Family	None

**Additional Notes:**

1. YHA is not currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision.
2. YHA certifies that the RAD conversion complies with all applicable site selection and neighborhood reviews standards and that all appropriate procedures have been followed.

## **Resident Rights, Participation, Waiting List and Grievance Procedures**

### **PBV Resident Rights and Participation.**

- 1. No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.<sup>1</sup> Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, this provision shall apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR § 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.<sup>2</sup>
- 2. Right to Return.** See section 1.4.A.5(ii) and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return.
- 3. Renewal of Lease.** Since publication of the PIH Notice 2012-32 Rev 1, the regulations under 24 CFR part 983 have been amended requiring Project Owners to

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<sup>1</sup> These protections (as well as all protections in this Notice for current households) also apply when a household is relocated to facilitate new construction or repairs following conversion and subsequently returns to the Covered Project.

<sup>2</sup> For non-RAD PBV households, applicable program requirements includes the requirement that any admission to the project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time.

renew all leases upon lease expiration, unless cause exists. MTW agencies may not alter this requirement.

- 4. Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "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 Calculated PBV TTP<sup>3</sup>

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<sup>3</sup> For example, where a resident's most recently paid TTP is \$100, but the Calculated PBV TTP is \$200 and remains \$200 for the period of the resident's occupancy, (i.e. no changes in income) the resident would continue to pay the same rent and utilities for which it was responsible prior to conversion. At the first recertification following conversion, the resident's contribution would increase by 33% of \$100 to \$133. At the second AR, the resident's contribution would increase by 50% of the \$66 differential to the standard TTP, increasing to \$166. At the third AR, the resident's contribution would increase to \$200 and the resident would continue to pay the Calculated PBV TTP for the duration of their tenancy.

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.

- 5. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are currently FSS participants will continue to be eligible for FSS once their housing is converted under RAD. The PHA may continue to use any FSS funds already awarded to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding and may use that funding to serve PH, HCV and/or PBRA participants in its FSS program. 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 there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident,

and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.<sup>4</sup> Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

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

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

- 6. 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.
- 7. Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

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<sup>4</sup> The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

- i. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be :
  - a. A reasonable period of time, but not to exceed 30 days:
    - i. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
    - ii. In the event of any drug-related or violent criminal activity or any felony conviction;
  - b. Not less than 14 days in the case of nonpayment of rent; and
  - c. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
- ii. **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 issues related to tenancy and termination of assistance, PBV program rules require the Project Owner to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi),<sup>5</sup> an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease **or** the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
  - i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).

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<sup>5</sup> § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed.

- ii.** For any additional hearings required under RAD, the Project Owner will perform the hearing.
- b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
- c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- d. The Project Owner provides opportunity for an informal hearing before an eviction.

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

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

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

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



- 3. When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice.<sup>6</sup> In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC.

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

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<sup>6</sup> For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

contract in accordance with 24 CFR §983.207 or, where “floating” units have been permitted, Section 1.6.B.10 of this Notice.

- 4. 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. 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 Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
- 2. Additional Monitoring Requirement.** The Owner must submit to the administering PHA and the PHA’s Board must approve the operating budget for the Covered Project annually in accordance with HUD requirements.<sup>7</sup>
- 3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** This section has been moved to 1.4.A.13 and 1.4.A.14.
- 4. Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
  - i.** Transferring an existing site-based waiting list to a new site-based waiting list.

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<sup>7</sup> For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of monitoring and evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

- ii.** Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
- iii.** 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.
- iv.** Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

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

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

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the wait-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).<sup>8</sup>

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

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).

- 5. Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
- 6. Agreement Waiver.** This section has been moved to 1.6.B.8.
- 7. Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC.
- 8. 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.

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<sup>8</sup> For more information on serving persons with LEP, please see HUD’s Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

PHAs operating 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.

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

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

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

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) 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.

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

#### **Significant Amendment Definition**

As part of the Rental Assistance Demonstration (RAD), YHA 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 either 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.

## **Attachment 1E - House Rules: Addendum A – Resident Procedural Rights**

The information provided below is being included as part of the House Rules for the associated projects and 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 converting assistance under RAD, that supplement notification requirements in regulations at 24 CFR § 880.607 and the Multifamily HUD Model Lease.

- i. *Termination of Tenancy and Assistance.*** The termination procedure for RAD conversions to PBRA will additionally require that Project Owners provide adequate written notice of termination of the lease which shall not be less than:
  - 1.** A reasonable period of time, but not to exceed 30 days:
    - a.** If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
    - b.** In the event of any drug-related or violent criminal activity or any felony conviction; or
  - 2.** Not less than 14 days in the case of nonpayment of rent; and
  - 3.** Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
- ii. *Termination of Assistance.*** In all other cases, the requirements at 24 CFR § 880.603, the Multifamily HUD Model Lease, and any other HUD multifamily administrative guidance shall apply.

- b. Grievance Process.** In addition to program rules that require that tenants are given notice of covered actions under 24 CFR Part 245 (including increases in rent, conversions of a project from project-paid utilities to tenant-paid utilities, or a reduction in tenant paid utility allowances), HUD is incorporating resident procedural rights to comply with the requirements of section 6 of the Act. RAD will require that:

- i.** Residents be provided with notice of the specific grounds of the Project Owner's proposed adverse action, as well as their right to an informal hearing with the Project Owner;
- ii.** Residents will have an opportunity for an informal hearing with an impartial member of the Project Owner's staff within a reasonable period of time;
- iii.** Residents will have the opportunity to be represented by another person of their choice, to ask questions of witnesses, have others make statements at the hearing, and to examine any regulations and any evidence relied upon by the Project Owner as the basis for the adverse action. With reasonable notice to the Project

Owner, prior to hearing and at the residents' own cost, resident may copy any documents or records related to the proposed adverse action; and

- iv.** Project Owners provide the resident with a written decision within a reasonable period of time stating the grounds for the adverse action, and the evidence the Project Owner relied on as the basis for the adverse action.

The Project Owner will be bound by decisions from these hearings, except if the:

- i.** Hearing concerns a matter that exceeds the authority of the impartial party conducting the hearing.
- ii.** Decision is contrary to HUD regulations or requirements, or otherwise contrary to federal, State, or local law.

If the Project Owner determines that it is not bound by a hearing decision, the PHA must promptly notify the resident of this determination, and of the reasons for the determination.