

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

**Applicability.** Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

<b>A.</b>	<b>PHA Information.</b>
A.1	<p> <b>PHA Name:</b> <u>Housing Authority of the City of Tulsa</u>    <b>PHA Code:</b> <u>OK073</u>  <b>PHA Type:</b>    <input type="checkbox"/> Small    <input checked="" type="checkbox"/> High Performer  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>01/2019</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> <u>2,501</u>    <b>Number of Housing Choice Vouchers (HCVs)</b> <u>4,878</u>  <b>Total Combined</b> <u>7,379</u>  <b>PHA Plan Submission Type:</b>    <input checked="" type="checkbox"/> Annual Submission                      <input type="checkbox"/> Revised Annual Submission         </p> <p> <b>Availability of Information.</b> 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 of 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 the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. <b>THA’s PHA plan is available on THA’s website at</b> </p>

[www.TulsaHousing.org](http://www.TulsaHousing.org) and located in the office of each AMP. THA's PHA plan, PHA Plan Elements, PHA policies, and all related information are available at THA's Central Office located at 415 E. Independence St. Tulsa, OK 74106.

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

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

**B. Annual Plan Elements**

**B.1 Revision of PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs.
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Homeownership Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Substantial Deviation.
- Significant Amendment/Modification

(b) The PHA must submit its Deconcentration Policy for Field Office Review.

**DECONCENTRATION POLICY**

It is the intent of THA to promote adequate and affordable housing, economic opportunity, and a suitable living environment free of discrimination. Tenant selection and assignment for federal public housing shall be made without regard to race, color, religion, ancestry/national origin, sex familial status, physical or mental disability, marital status age, or gender identity. To improve community quality of life and economic vitality, THA will implement measures to provide for deconcentration of poverty and income-mixing. THA will bring higher income tenants into lower income developments and lower income tenants into higher income developments. Additionally, THA will support measures to raise the income of households that currently reside in federal public housing. All measures and incentives that are undertaken

to accomplish deconcentration and income-mixing will be uniformly applied.

THA 's admission policy is designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. Gross annual income is used for income limits at admission and for income-mixing purposes. Skipping a family on the waiting list specifically to reach another family with a lower or higher income is not to be considered an adverse action to the family. Such skipping will be uniformly applied until the target threshold is met.

THA will gather and analyze tenant data once every two years. The tenant characteristics of its public housing stock, including information regarding tenant incomes, to assist THA in its deconcentration efforts.

THA will use the gathered tenant incomes information in its assessment of its public housing developments to determine the appropriate designation to be assigned to the project for the purpose of assisting in its deconcentration goals.

If THA's review of tenant incomes indicates that there has been a meaningful change in the tenant income characteristics of a particular project, THA will evaluate the changes to determine whether, based on the methodology of choice, the project may need to be redesignated as a higher or lower income project or whether THA has met the deconcentration goals and the project needs no designation.

#### **Deconcentration and Income-Mixing Goals**

Admission policies related to the deconcentration efforts of THA do not impose specific quotas. Therefore, THA will not set specific quotas, but will strive to achieve deconcentration and income-mixing in its developments over time.

THA 's income-mixing goal is a long-range goal and may not be achieved in the first year of implementation. THA will use its analysis of its public housing stock and tenant incomes to provide data benchmarks. Additionally, as THA recapitalizes and/or adds additional units to its covered developments, mixed income will be a primary tool to meet the objective of deconcentrating poverty. Units designated to attract residents with median income in the 80% - 120% AMI will assist our goals of developing mixed income communities in furtherance of HUD's goals to affirmatively further fair housing and deconcentrate poverty.

#### **Project Designation Methodology**

THA will determine and compare tenant incomes at the developments listed in this Chapter. Upon analyzing its findings THA will apply the policies, measures and incentives listed in this Chapter to bring higher income families into lower income developments and lower income families into higher income developments.

THA 's goal is to have eligible families having higher incomes occupy dwelling units in covered projects predominantly occupied by eligible families having lower incomes, and eligible families having lower incomes occupy dwelling units in covered projects predominantly occupied by eligible families having higher incomes. Families having lower incomes include very low and extremely low-income families. When selecting applicant families and assigning transfers for designated covered projects, THA will determine whether the selection of the family will contribute to the deconcentration goals.

THA may not select a family for a particular project if the selection will have a negative effect on the PHA's deconcentration goals. However, if there are insufficient families on the waiting list, transfer list, the development has multiple vacancies, or efforts to deconcentrate will result in a unit remaining vacant longer than THA's goal of 10 days from vacant to being reoccupied by an eligible family, THA may not strictly adhere to the deconcentration methodology.

**Transfer Policy, Deconcentration**

THA will consider its deconcentration goals when transfer units are offered. When families are no longer eligible for their current unit because of a change in family composition, THA will consider its deconcentration goals when seeking to relocate these families within the portfolio.

**Steps for Implementation (24 C.F.R. 903.2)**

**Step 1:**

Every two years, THA will determine the average income of all families residing in all covered developments for THA. As of June 2017, the average income for all THA covered developments is: \$5,992.66.

**Step 2:**

Every two years, THA will determine the average income of all families residing in each covered development.

Development	Average Income
Seminole Hills	\$ 4,884.25
Comanche Park	\$ 3,912.97
Pioneer Plaza	\$ 8,020.43
Apache Manor	\$ 3,847.69
Mohawk Manor	\$ 3,982.73
Hewgley Terrace	\$ 7,607.76
Riverview Park	\$ 5,886.38
Sandy Park	\$ 5,243.96
Parkview Terrace	\$ 4,539.73
Lafortune Towers	\$ 9,557.32
South Haven Manor	\$ 5,012.21
East Central Village	\$ 5,180.33
East Central Village	\$ 8,666.55
Scattered Sites Housing	

**Step 3:**

Every two years, THA will determine whether each covered development falls above or below the average income for families residing in all covered developments. The average income of all families residing in all covered developments for THA is currently \$5,992.66.

**Step 4:**

THA will determine which families on each covered development’s waitlist have incomes higher than the THA -wide average and designate these families as “higher income families,” and which have incomes lower than the THA -wide average and designate these families as “lower income families.”

**Step 5:**

When a unit becomes available in a higher income building, THA may skip families on the waiting list if necessary to reach a lower income family to whom it will offer the unit. When a unit becomes available in a lower income building, THA may skip families on the waiting list if necessary to reach a higher income family to whom it will offer the unit. Skipping shall be applied to the site-based waiting lists. If a waiting list does not contain a family in the income category to which the unit is to be offered, THA shall offer the unit to a family in the other income category.

If there are insufficient families on the waiting list, transfer list, the development has multiple vacancies, or efforts to deconcentrate will result in a unit remaining vacant longer than THA’s goal of 10 days from vacant to being reoccupied by an eligible family, THA may not strictly adhere to the deconcentration methodology. THA’s deconcentration of poverty activities must be balanced with THA’s overall objective to provide decent, safe, and sanitary housing to as many eligible families as possible.

**THA Incentives for Higher Income Families**

THA may offer certain incentives to higher income families willing to move into lower income projects. THA will not take any adverse action against any higher income family declining an offer by the PHA to move into a lower income project.

In addition to maintaining its public housing stock in a manner that is safe, clean, well landscaped and attractive, the PHA may offer the following incentives for higher income families moving into lower income projects:

- (A) Offer rent incentives for up to 90 days;*
- (B) Skip a family on the waiting list to reach another family in an effort to further the goals of the deconcentration policy;*
- (C) Provide such other strategies as permitted by statute and determined by the PHA in consultation with the residents and the community, through the PHA Annual Plan process, to be responsive to the local context and the PHA’s strategic objectives.*

(c) If the PHA answered yes for any element, describe the revisions for each element below:

**FINANCIAL RESOURCES**

Sources		Projected	Planned Uses
<b>1.</b>	<b>Federal Grants</b>	<b>2019</b>	
a)	Public Housing Operating Fund Formula	\$ 11,494,817	Public Housing Operations
b)	Public Housing Capital Fund Program	\$ 5,401,551	Public Housing Capital Improvements

c)	Section 8 Tenant-Based Assistance	\$ 31,960,438	Section 8 Housing Choice Vouchers Housing Assistance
d)	Section 8 Tenant-Based Assistance	\$ 473,362	Section 8 Moderate Rehab Housing Assistance
e)	Section 8 Project-Based Assistance	\$ 3,616,956	Section 8 Project Based Operations
f)	Resident Opportunity and Self-Sufficiency Grants	\$ 90,319	Public Housing Supportive Services and Self Sufficiency
g)	FSS Grant	\$ 93,260	Section 8 Project Based Supportive Services
h)	Choice Neighborhoods Implementation Grant	\$ 30,000,000	Choice Neighborhoods Implementation Grant
<b>2.</b>	<b>Prior Year Federal Grants (unobligated funds only)</b>		
a)	2015 Public Housing Capital Fund Program	\$ 38,518	Public Housing Capital Improvements
b)	2016 Public Housing Capital Fund Program	\$ 472,865	Public Housing Capital Improvements
c)	2017 Public Housing Capital Fund Program	\$ 1,480,753	Public Housing Capital Improvements
<b>3.</b>	<b>Dwelling Rental Income</b>		
a)	Public Housing Dwelling Rental Income	\$ 2,955,087	Public Housing Operations
b)	Section 8 Project Based Dwelling Rental Income	\$ 1,215,049	Section 8 Projected Based Housing Operations
<b>4.</b>	<b>Other Income</b>		
a)	Public Housing Operations Interest	\$ 183,562	Public Housing Operations
b)	Public Housing Operations Other Income	\$ 611,342	Public Housing Operations
c)	Section 8 Project Based Interest	\$ 38,019	Section 8 Project Based Operations
d)	Section 8 Project Based Other Income	\$ 95,357	Section 8 Project Based Operations
e)	Section 8 Tenant Based Interest	\$ 8,976	Section 8 Housing Choice Vouchers Tenant Based Operations
f)	Section 8 Tenant Based Other Income	\$ 30,588	Section 8 Housing Choice Vouchers Tenant Based Operations
g)	Section 8 Tenant Based Other Income	\$ 863	Section 8 Moderate Rehab Tenant Based Operations
<b>5.</b>	<b>Non-Federal Sources</b>		
a)	Central Office Cost Center Interest	\$ 77,610	Central Office Cost Center Operations
b)	Central Office Cost Center Other Income	\$ 17,024	Central Office Cost Center Operations
c)	Auxiliary Fund Interest/Other Income	\$ 34,630	Support PHA Operations
d)	Nogales Realty LLC	\$ 7,182	Support PHA Operations
<b>Total Resources</b>		<b>\$ 90,398,128</b>	

**SAFETY & CRIME PREVENTION**

THA and the Tulsa County Sheriff Office (TCSO) have entered into an Interlocal Co-operation Agreement that began during 2018 to provide a Community Enhancement Unit that will serve THA’s apartment communities.

**SUBSTANTIAL DEVIATION/SIGNIFICANT AMENDMENT**

As part of the Rental Assistance Demonstration (RAD), the Housing Authority of the City of Tulsa 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.

**B.2 New Activities.**

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

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Conversion of Public Housing to Tenant Based Assistance.
- Conversion of Public Housing to Project-Based Assistance under RAD.
- Project Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

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

**CHOICE NEIGHBORHOODS**

THA and the City of Tulsa have been awarded a \$30 million FY 2017 Choice Neighborhoods Implementation Grant for the Eugene Field Neighborhood. While located in a potentially desirable area, isolating physical barriers, years of disinvestment, and over-concentration of distressed, subsidized housing have hindered the neighborhood’s possibilities. Despite these obstacles, THA, the City of Tulsa, and the community used a FY 2010 Choice Neighborhoods Planning Grant to create a collective vision that has begun to transform their neighborhood. The Choice Neighborhoods Implementation grant, and significant private and public leverage will

accelerate the progress. With these resources, Tulsa will replace the distressed Riverview Park apartments, which has 190 public housing apartments, and Brightwater Apartments, which has 200 Section 8 project-based apartments, with high quality mixed-income housing totaling 460 apartments; dramatically improve children’s educational outcomes, open new employment opportunities, and increase health care access; and implement catalytic neighborhood improvements that will build upon Eugene Field’s assets. Phase I of this project is scheduled to begin in 2019.

**MIXED FINANCE MODERNIZATION OR DEVELOPMENT & CONVERSION OF PUBLIC HOUSING TO PROJECT-BASED UNDER RAD**

See Attachment: Rental Assistance Demonstration (RAD).

**DEMOLITION AND/OR DISPOSITION & CONVERSION OF PUBLIC HOUSING TO TENANT BASED ASSISTANCE**

The Housing Authority of the City of Tulsa (THA) has determined that due to the distance between units and lack of uniformity of systems that operating Scattered Site units is not sustainable for the long term for our agency. THA is planning to submit a Disposition application to the Department of Housing and Urban Development’s Special Application Center for all two hundred and thirteen (213) of the existing Scattered Site homes. THA will apply for Tenant Protection Vouchers for assistance for each of the 213 homes and will follow all Relocation requirements for the 213 families living in the homes at the time that Disposition is approved. Any funds received from the sale of the properties will remain within THA’s Public Housing program.

The properties to be sold are located at the following addresses:

102 W 65TH PL N	18535 E 3RD PL	5014 S 92ND E AVE
1030 E 51ST PL N	1907 N CHEYENNE AVE	5021 S 85TH E AVE
1038 N 78TH E AVE	2002 N ROCKFORD AVE	5030 N DENVER PL
106 W 63RD ST N	2003 N SAINT LOUIS AVE	510 E 51ST PL N
11035 E 38TH ST	2005 N UTICA AVE	513 E 57TH ST N
1107 N CANTON AVE	2006 N ROCKFORD AVE	516 E 58TH ST N
11122 E 36TH ST S	2007 N QUAKER AVE	517 E 43RD ST N
11580 E 8TH ST S	2007 N QUINCY AVE	519 E 59TH ST N
116 W 63RD ST N	2008 N QUAKER AVE	520 E 51ST PL N
11635 E 28TH ST	2010 N QUAKER AVE	522 EAST 40TH ST N
119 W 49TH ST N	2011 N QUINCY AVE	524 E 49TH CT N
12 W 65TH PL N	2012 N SAINT LOUIS AVE	532 E 57TH PL N
120 W 63RD ST N	2013 N QUAKER AVE	537 E 55TH ST N
12307 E 26TH ST	2015 N UTICA AVE	544 E 54TH PL N
125 S 169TH E AVE	2016 N ROCKFORD AVE	5440 N IROQUOIS AVE
12946 E 32ND ST	2016 N SAINT LOUIS AVE	546 E 57TH PL N
135 S 168TH E AVE	2018 N ROCKFORD AVE	558 E 49TH ST N
138 W 50TH CT N	2024 N TRENTON AVE	5618 N FRANKFORT AVE
1403 E READING ST	2029 N QUINCY AVE	562 E 57TH PL N
1408 E SEMINOLE ST	2030 N SAINT LOUIS AVE	5658 N ELGIN AVE
1417 E READING ST	2032 N QUAKER AVE	573 E 59TH ST N
15 S 185TH E AVE	2034 N TRENTON AVE	574 E 59TH ST N
1510 E SEMINOLE ST	2036 N QUAKER AVE	5920 N ELGIN AVE
1514 E 49TH ST	209 W 61ST PL N	5948 N GARRISON AVE
1522 E SEMINOLE ST	2222 N OSWEGO AVE	6018 N GARRISON PL
1524 E 51ST PL N	23 E 62ND PL N	6102 N MAIN ST
1524 E 51ST ST N	2408 S NOGALES AVE	6103 N BOULDER AVE
154 W 50TH PL N	2437 N VANDALIA AVE	613 E 51ST PL N



1541 S 137TH E AVE	254 E 52ND PL N	618 E 54TH ST N
1550 E SEMINOLE ST	266 E 52ND ST N	6218 N MAIN ST
1555 S 139TH E AVE	27 E 62ND PL N	6228 N MAIN ST
1578 N NEW HAVEN AVE	2907 S 124TH E AVE	6229 N CHEYENNE AVE
1613 N TROOST AVE	2911 S 121ST E AVE	6236 E LATIMER PL
1620 E SEMINOLE ST	305 W 63RD CT N	624 E 54TH ST N
17 E 62ND PL N	310 W 63RD CT N	626 E 47TH PL N
1801 N TRENTON AVE	3124 E XYLER ST	628 E 52ND PL N
1801 N TROOST AVE	314 E 58TH ST N	6314 N CHEYENNE AVE
1802 N TRENTON AVE	314 W 49TH ST N	6317 N CHEYENNE AVE
1803 N TROOST AVE	3212 E XYLER ST	6328 N BOULDER ST
1805 N UTICA AVE	3336 N GARRISON AVE	6332 N MAIN ST
1807 N PEORIA AVE	3347 S 142ND E AVE	6337 N MAIN ST
1808 N TRENTON AVE	335 W 61ST PL N	6338 N MAIN ST
1810 N SAINT LOUIS AVE	338 E 57TH PL N	6341 N BOULDER AVE
1810 N UTICA AVE	34 E 63RD ST N	6342 N MAIN ST
1813 N UTICA AVE	3447 S 151 ST E AVE	6352 N MAIN ST
1815 N QUAKER AVE	3508 E VIRGIN ST	6359 N DENVER AVE
1815 N UTICA AVE	3514 E WOODROW PL	6378 N DENVER AVE
1818 N UTICA AVE	3539 E XYLER ST	6389 N BOULDER AVE
1819 N PEORIA AVE	3617 S INDIANAPOLIS AVE	6390 N BOULDER AVE
1819 N QUAKER AVE	3812 E YOUNG ST	6393 N BOULDER AVE
1821 N QUAKER AVE	4 E 50TH PL N	6396 N CHEYENNE AVE
1821 N TRENTON AVE	4108 N FRANKFORT PL	6397 N BOULDER AVE
1822 N TRENTON AVE	4122 E XYLER ST	6415 N MAIN ST
1823 N PEORIA AVE	421 W 65TH PL N	6418 N MAIN ST
1825 N ROCKFORD AVE	4230 E YOUNG ST	6425 N MAIN ST
1826 N QUAKER AVE	424 W 65TH PL N	644 E 52ND ST N
1827 N TRENTON AVE	4276 E YOUNG PL	6719 E 28TH ST
1829 N TROOST AVE	4313 N FRANKFORT	6728 E JASPER ST
1831 N ROCKFORD AVE	4317 N FRANKFORT PL	6732 E 30TH ST
1833 N TRENTON AVE	4317 N GARRISON AVE	6753 E JASPER ST
1834 N QUAKER AVE	4324 N KENOSHA AVE	720 E 51ST PL N
1834 N SAINT LOUIS AVE	4365 N FRANKFORT PL	7713 E 30TH PL
1838 N TRENTON AVE	4448 N DETROIT PL	7815 E NEWTON ST
1839 N TRENTON AVE	447 E 59TH PL N	7846 E MARSHALL ST
1841 N ROCKFORD AVE	4509 E XYLER ST	810 E 52ND PL N
1841 N UTICA AVE	4610 N BOSTON PL	8914 E OKLAHOMA PL
1843 N QUAKER AVE	4620 N TROOST AVE	8917 E 47TH PL
1844 N QUAKER AVE	4622 N MAIN ST	9114 E NEWTON ST
1845 N ROCKFORD AVE	4695 N CHEYENNE AVE	915 W 24TH PL
1845 N TROOST AVE	4698 N BOULDER AVE	9153 E LATIMER PL
1845 N UTICA AVE	4824 N IROQUOIS AVE	920 W 24TH PL

Once approved for Disposition, THA will work with a real estate broker to sell the 213 homes individually either directly by the broker or at auction.

**PROJECT BASED VOUCHERS**

THA approved 200 Project Based vouchers out of its 4,878 vouchers (4.10%) during 2018. 70 of these vouchers have been awarded via the Request for Proposal process. THA intends to award the remaining 130 Project Based Vouchers. Please refer to the Section 8 Administrative Plan, Attachment B.

### **UNITS WITH APPROVED VACANCIES FOR MODERNIZATION**

THA has ongoing units that apply for approved vacancies for modernization.

### **OTHER CAPITAL GRANT PROGRAMS**

If eligible, THA intends to apply for a CFP Security grant.

### **THA's Strategic Plan**

THA's strategic goals are:

- Increase and provide sustainable, affordable housing / become a premier provider
- Improve self-sufficiency for residents
- Strengthen THA's organizational capacity / advance workforce development and performance
- Strengthen relations with key community constituencies
- Assist in the improvement and development of Tulsa's urban core and neighborhoods
- Strengthen THA's finances

### **Progress Report.**

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

**Rental Assistance:** Maintain "High Performer" status under HUD's Section 8 Management Assessment Program (SEMAP). Maintain high utilization of vouchers and budget without exceeding authorized limits. Continue the HUD-Veterans Affairs Supportive Housing Program (VASH) with approved special vouchers, and coordinate with partner agencies to receive required referrals.

- Maintain 98% occupancy in the Housing Choice Voucher Program
  - *THA monitors utilization of budget authority and leasing, turnover of Vouchers and success rates monthly to maintain 98% occupancy for the program for the fiscal year. THA's Budget Authority usage for CY 2017 was right at 100%. THA's Section 8 Department was a SEMAP High Performer in 2017.*
- Maintain 100% occupancy in VASH program
  - *THA staff participate in bi-monthly conference calls with VA case managers to identify obstacles that VASH participants are encountering while either in search of housing or while utilizing the VASH Voucher. THA staff work very closely with the VA and BRRX staff in the case management of VASH participants to lease the program to its maximum capacity.*
- Apply for 100% of VASH Vouchers available
  - *THA applied for additional VASH Vouchers and received an allocation of 10 additional VASH Vouchers in 2018. THA now maintains 70 VASH vouchers.*
- Ensure 98% of the FSS slots available are utilized
  - *The FSS program continues to strengthen their partnerships with TRIO, CAP, Housing Partners of Tulsa, and Workforce Tulsa. The FSS coordinators will be assisting with the Green Country Money Matters Initiative started by the Alliance for Economic Inclusion during their first Financial Fun Fair at Reed Park on April 21, 2018. There will be various banking institutions, credit counseling, and community resources. The FSS Coordinators have also been invited to participate on the TRIO Advisory Board where they will have the opportunity to assist in effectively changing education in the Tulsa community. In 2019, we hope to grow our program by gaining new partnerships, encourage suitable employment,*

*promote homeownership, and learn more strategies to effectively guide our participants to self-sufficiency.*

- Provide training to Assisted Housing staff on regulatory changes quarterly to ensure compliance
  - *Supervisory staff participated in training sessions consisting of Coaching Skills for Managers and Supervisors, Managing Multiple Priorities, Projects and Deadlines, Put Your Best Voice Forward, and Creative Leadership. In addition, management staff attended High Performance Management and Low-Income Housing Tax Credit Training. Housing Coordinators participated in Fair Housing Training, HQS Inspection Training, Legal Seminar Training/Landlord Tenant Act, and Background Checks and Screenings for Applicants and Participants. In addition, all Inspectors received their HQS Certification and several Housing Coordinators received their Housing Specialist Certification.*

### **Housing Operation Goals**

- Maintain “High Performer” status under HUD’s Public Housing Assessment System (PHAS) by achieving an overall performance score of 90% or greater. Continue training so that 100% of the Property Management is trained on regulatory changes as well as best practices to ensure that Tulsa Housing Authority’s Public Housing continues to be managed to the highest possible standards.
  - *THA received High Performer for Public Housing for the 2017 Fiscal Year. Sr. Managers of Affordable Housing attended a Management Conference through Fred Pryor and the High Performance Management training through NAHRO. Sr. Managers and Property Managers attended the PHM Certification and COS Certification. Public Housing administration staff attended a week-long Rent Calculation training. Property staff have received Procurement Training. Members of maintenance attended the annual NAHRO Maintenance Conference which included Reasonable Accommodations and Modifications. Property Managers attended the Fair Housing training with the TAA*
- Improve housing operations through increased training and development/revision of internal operating procedures
  - Hired Operations Director to oversee and monitor process improvement
  - Conducted staff training on HUD PIC (Public Information Center) with methods to identify, correct and avoid 50058 reporting errors.
  - All property management staff completed certification training on Low Income Housing Tax Credits in preparation for future development/financing opportunities.
  - Management staff at PBRA properties completed Certified Occupancy Specialist training in 2018.
- Implement new housing software management system by March 2019
  - Staff selected a software vendor during 2018 and are currently working on implementation of the new software.

### **Social Services Department**

The Social Services department will strive to secure alternative funding sources enabling us to maintain self-sufficiency programs and services for residents:

- Evaluate partnership with Housing Partners of Tulsa (HPT) to determine if HPT’s mission and scope is aligned with the needs of THA residents for funding opportunities at the 100<sup>th</sup> percentile to apply for specific funds available and can provide additional programs relating to Self-Sufficiency.
  - *During 2018, HPT took over oversight of THA’s Social Services Department.*
- Utilize fundraising efforts to supplement resident programs by holding a minimum of 5 fundraising events (i.e. school supply drive, school uniform drive, canned food drive).

- *Social Services held five fundraisers to include: school uniform drive, school supply collection, food drive, literacy/book drive and holiday donations for youth.*

- Review 100% of existing programs, staffing levels and funding sources to evaluate the feasibility of program effectiveness.
  - *The Needs Assessment has been revised to help evaluate program effectiveness. The Needs Assessment revision has enabled THA to capture data that can be used to pursue funding opportunities. In reviewing program effectiveness, the decision was made to strengthen THA's partnerships with existing agencies and reach out to new agencies in the community to expand resources for our residents as well as recreational activities for the youth.*

**Security Goal**

- Enhance the effectiveness of the Security Department:
  - *During 2018, THA entered into an agreement with the Tulsa County Sherriff's Office to provide a Community Enhancement Unit that operates on THA's properties.*
  - *All prospective public housing residents are required to attend a domestic violence class prior to leasing. THA has partnered with Domestic Violence Intervention Services (DVIS) to conduct classes scheduled each Monday afternoon at the THA central office.*
  - *THA worked with the Tulsa Fire Department to hold Fire Safety classes at each site.*
  - *Resident Associations are encouraged to incorporate neighborhood watch and community policing activities to improve safety and security.*

**Homeownership Goals**

- Increase utilization of THA's Section 8 Homeownership vouchers
  - Continue to make voucher participants aware of the Section 8 Homeownership vouchers
- All other homeownership activities are under the control of Housing Partners of Tulsa, which is a separate non-profit operating in Tulsa.

**Most Recent Fiscal Year Audit.**

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

Y N

(b) If yes, please describe:

The 2017 Financial Audit contained a finding that THA did not follow the internal controls in place to ensure compliance with its ACOP due to 1 of 25 public housing files tested did not have a letter to the tenant notifying their name had reached the top of the list. 1 of 25 public housing files tested had a "pull" dated that was before the application dated. There was a second finding that THA did not follow the internal controls in place to ensure compliance Eligibility requirements due to 4 of 40 public housing files tested having exceptions. 1 of 40 public housing files reported income incorrectly which also lead to the incorrect calculation of the tenant rent. 2 of the 40 public housing files did not have the public housing worksheet signed and dated. 1 of the 40 files could not be tested, as THA staff could not locate the file. There was one Prior Year finding due to 2 of 25 tested Public Housing tenant files having incorrectly documented income on the HUD-50058.

THA now has a Management Analyst that conducts file reviews each month to identify and correct any deficiencies noted. In addition, two District Managers will perform quality control reviews and file audits of properties within their respective portfolios. Also, THA is in the process of revising its ACOP and will provide training to property management staff during the 4<sup>th</sup> quarter of 2018. The training will ensure that all property management staff understand how to properly follow wait list procedures and accurately process admissions to agency housing programs, as well as complete correct tenant rent calculations. Internal, periodic training sessions

	and testing on rent calculations have been established as well as formalized training from industry leaders NAHRO and Nan McKay & Associates have been provided to current staff.												
<b>Other Document and/or Certification Requirements.</b>													
<b>C.1</b>	<p><b>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</b></p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>												
<b>C.2</b>	<p><b>Civil Rights Certification.</b></p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>												
<b>C.3</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?  Y    N  <input type="checkbox"/>   <input checked="" type="checkbox"/></p> <p>If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p><b>RAB members:</b></p> <table border="0"> <tr> <td><b>Donald Rose – Hewgley Terrace</b></td> <td><b>Monica Guinn – Riverview Park</b></td> </tr> <tr> <td><b>Deborah Rumfelt – LaFortune Tower</b></td> <td><b>Robert Jones – Pioneer Plaza</b></td> </tr> <tr> <td><b>Mary Duckworth – Murdock Villa</b></td> <td><b>Debra Hunter – Inhofe Plaza</b></td> </tr> <tr> <td><b>Sidney McCalib – Comanche Park</b></td> <td><b>Marc Manuson – Section 8</b></td> </tr> <tr> <td><b>Charlotte Ricks – Section 8</b></td> <td><b>Emeka Nnaka – Section 8</b></td> </tr> <tr> <td><b>Michael Smith – Section 8</b></td> <td></td> </tr> </table>	<b>Donald Rose – Hewgley Terrace</b>	<b>Monica Guinn – Riverview Park</b>	<b>Deborah Rumfelt – LaFortune Tower</b>	<b>Robert Jones – Pioneer Plaza</b>	<b>Mary Duckworth – Murdock Villa</b>	<b>Debra Hunter – Inhofe Plaza</b>	<b>Sidney McCalib – Comanche Park</b>	<b>Marc Manuson – Section 8</b>	<b>Charlotte Ricks – Section 8</b>	<b>Emeka Nnaka – Section 8</b>	<b>Michael Smith – Section 8</b>	
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<b>Michael Smith – Section 8</b>													
<b>C.4</b>	<p><b>Certification by State or Local Officials.</b></p> <p><u>Form HUD 50077-SL</u>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>												
<b>D</b>	<p><b>Statement of Capital Improvements.</b> Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>												
<b>D.1</b>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p><b>HUD Form 50075.2 Approved by HUD on 07/16/18.</b></p>												

# ATTACHMENT A

## RENTAL ASSISTANCE DEMONSTRATION (RAD)

The Housing Authority of the City of Tulsa (THA) was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the Housing Authority of the City of Tulsa 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 Housing Authority of the City of Tulsa certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Housing Authority of the City of Tulsa 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. The Housing Authority of the City of Tulsa will be using existing PHA resources (including Capital and Operating Funds and existing reserves) as well as additional sources, including private or FHA-insured debt, Low Income Housing Tax Credits (LIHTC), and other soft debt or grants.

Below, please find specific information related to the Public Housing Development(s) that were approved for RAD conversion by HUD in August 2018:

<b>Name of Public Housing Development:</b> COMANCHE PARK	<b>PIC Development ID:</b> OK073000003	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 271	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$5,340,112 / 2,501 units x 271 units = \$578,636.70
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			
One Bedroom	13	13	0
Two Bedroom	96	96	0
Three Bedroom	128	128	0
Four Bedroom	20	20	0

Five Bedroom	14	14	0
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> PARKVIEW TERRACE	<b>PIC Development ID:</b> OK073000012	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 225	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$5,340,112 / 2,501 units x 225 units = \$480,417.91
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			
One Bedroom	8	8	0
Two Bedroom	68	68	0
Three Bedroom	133	133	0
Four Bedroom	16	16	0
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development:</b> HEWGLEY TERRACE	<b>PIC Development ID:</b> OK073000007	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No

<b>Total Units: 150</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$5,340,112 / 2,501 units x 150 units = \$320,278.61
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency	90	90	0
One Bedroom	59	59	0
Two Bedroom	1	1	0
Three Bedroom			
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: EAST CENTRAL VILLAGE</b>	<b>PIC Development ID:</b> OK073000018	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units: 150</b>	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$5,340,112 / 2,501 units x 150 units = \$320,278.61
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>



Studio/Efficiency			
One Bedroom	20	20	0
Two Bedroom	106	106	0
Three Bedroom	24	24	0
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: APACHE MANOR</b>	<b>PIC Development ID:</b> OK073000005	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No
<b>Total Units:</b> 160	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$5,340,112 / 2,501 units x 160 units = \$341,630.52
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			
One Bedroom			
Two Bedroom	56	56	0
Three Bedroom	87	87	0
Four Bedroom	11	11	0
Five Bedroom	6	6	0
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>Name of Public Housing Development: SANDY PARK</b>	<b>PIC Development ID:</b> OK073000010	<b>Conversion type (i.e., PBV or PBRA):</b> PBV	<b>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</b> No

<b>Total Units:</b> 160 (See note below)	<b>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</b> Family	<b>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</b> Family	<b>Capital Fund allocation of Development:</b> <b>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</b> \$5,340,112 / 2,501 units x 160 units = \$341,630.52
<b>Bedroom Type</b>	<b>Number of Units Pre-Conversion</b>	<b>Number of Units Post-Conversion</b>	<b>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</b>
Studio/Efficiency			
One Bedroom	12	12	0
Two Bedroom	46	46	0
Three Bedroom	88	88	0
Four Bedroom	12	12	0
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) N/A		
<b>NOTE:</b> Prior to their removal from PIC, two (2) of the 2-bedroom units at Sandy Park Apartments were designated PHA Use Non-Dwelling to provide space for a non-profit health clinic. THA intends to continue clinic operations in the units post-conversion and will work with HUD to determine feasibility.			

## **RAD RESIDENT RIGHTS, PARTICIPATION, WAITING LIST AND GRIEVANCE PROCEDURES**

*(Please note the residents rights listed below are from HUD Notice PIH-2012-32 (HA) H-2017-03, REV-3, Section 1.6 C and Section 1.6 D (the “Notice”))*

- 1. No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute<sup>1</sup>, at conversion, current households cannot be excluded from occupancy at the Covered Project<sup>2</sup> based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project<sup>3</sup> 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>4</sup>. Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to Project Based Voucher (“PBV”) requirements regarding continued occupancy unless explicitly modified in HUD Notice PIH-2012-32 (HA) H-2017-03, REV-3 (the “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. Moving to Work (“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 Project Based Rental Assistance (“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>5</sup>
  
- 2. Right to Return.** See section 1.4.A.5(ii) of the Notice reference below and the RAD Fair Housing, Civil Rights, and Relocation Notice (as defined below) regarding a resident’s right to return.
  - i. RAD Fair Housing, Civil Rights, and Relocation Notice.** Relocation requirements related to public housing conversions under RAD are described in Notice H 2016-17; PIH 2016-17, as may be amended from time to time (“RAD Fair Housing, Civil Rights, and Relocation

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<sup>1</sup> RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Pub. L. No. 112-55, approved November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Pub. L. No. 113-76, approved January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Pub. L. No. 113-235, approved December 6, 2014), and Division L, Title II, Section 237 of the Consolidated Appropriations Act (Pub. L. No. 114-113, enacted December 18, 2015), collectively, the “RAD Statute.”

<sup>2</sup> *Covered Project* - The post-conversion property with assistance converted from one form of rental assistance to another under the Demonstration.

<sup>3</sup> *Converting Project* - The pre-conversion property whose assistance is converting from one form of rental assistance to another under the Demonstration.

<sup>4</sup> These protections (as well as all protections in HUD Notice PIH-2012-32 (HA) H-2017-03, REV-3 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>5</sup> For non-RAD PBV households, applicable program requirements include 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.

Notice”).<sup>6</sup> The RAD Fair Housing, Civil Rights, and Relocation Notice provides PHAs and their development partners with information and resources on RAD program requirements and Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) requirements when planning for or implementing resident moves in connection with a RAD conversion under the First Component of RAD. Specifically, the RAD Fair Housing, Civil Rights, and Relocation Notice provides guidance on relocation planning, resident right to return, relocation assistance, resident notification, initiation of relocation, and the fair housing and civil rights requirements applicable to these activities. In the event of a conflict between this Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice, with regard to relocation requirements, the RAD Fair Housing, Civil Rights, and Relocation Notice controls.

- ii. **Right to Return.** Any resident that may need to be temporarily relocated to facilitate rehabilitation or construction has a right to return to an assisted unit at the Covered Project once rehabilitation or construction is completed. Permanent involuntary displacement of residents may not occur as a result of a project’s conversion of assistance, including, but not limited to, as a result of a change in bedroom distribution, a de minimis reduction of units, the reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to facilitate social service delivery. Where the transfer of assistance to a new site is warranted and approved (see Section 1.4.A.12 of the Notice), residents of the Converting Project will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. For more information on how to implement these provisions see the RAD Fair Housing, Civil Rights, and Relocation Notice.
- iii. **Ineligibility of Tenant Protection Vouchers.** Conversion of assistance is not an event that triggers the issuance of Tenant Protection Vouchers to residents of public housing projects going through a RAD conversion.<sup>7</sup>

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

**Phase-in of Tenant Rent Increases.** If a tenant’s monthly rent increases by more than the greater of 10 percent or \$25 purely because 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

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<sup>6</sup> “Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions”  
[http://portal.hud.gov/hudportal/documents/huddoc?id=RAD\\_Notice2.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=RAD_Notice2.pdf).

<sup>7</sup> This provision does not preclude a PHA from receiving tenant protection vouchers for a property that has also received a Choice Neighborhoods Implementation grant.

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>8</sup>

Five Year Phase in:

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

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

- 4. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are currently FSS participants will continue to 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.

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<sup>8</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 TPP, increasing to \$166. At the third AR, the resident’s contribution would increase to \$200 and the resident would continue to pay the Calculated PBV TTP for the duration of their tenancy.

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>9</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 .

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.

- 5. Resident Participation and Funding.** In accordance with Attachment 1B of the Notice, residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for addressing issues related to their living environment and be eligible for resident participation funding.
- 6. Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.
  - i. Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:
    - a. A reasonable period, 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, 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.

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<sup>9</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.

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

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

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

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). 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.

8. **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.
9. **When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent,

plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR§ 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. 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>10</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 contract in accordance with 24 CFR §983.207 or, where "floating" units have been permitted, Section 1.6.B.10 of this Notice.

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

**11. 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.
- 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.

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<sup>10</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.



- 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>12</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).

**12. 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.

## **RELOCATION PLANS**

Whenever possible, THA intends to reduce the need for offsite tenant relocation through either minor in-place rehabilitation or onsite relocation to vacant units accrued through routine unit turnover. If a resident must be temporarily relocated to facilitate site improvements, the temporary relocation will be performed at no expense to the resident. THA intends to use vacant THA-owned units at other public housing or affordable housing properties for any offsite temporary relocation that may become necessary. No resident will be involuntarily permanently displaced through any RAD relocation process. All relocation activities will comply with RAD program rules found in PIH Notice 2012-32 REV 3 and PIH Notice 2016-17 and relocation requirements found under the Uniform Relocation Act (URA) and HUD's implementing and associated regulations, guidance, and notices.

## **SITE SELECTION AND NEIGHBORHOOD STANDARDS**

For any new construction or transfer of assistance project the PHA will rely on the review and approval from FHEO to assure that the site adheres to any area housing standards. For projects that will not include any new construction or transfer of assistance, the PHA will rely on any previous reviews and/or approvals that were obtained at the origination of the project.

## **VOLUNTARY COMPLIANCE AGREEMENT, CONSENT ORDER OR DECREE**

THA certifies that it is currently compliant with all fair housing and civil rights requirements. THA is currently not under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision. RAD conversion at the THA developments previously listed will not have a negative impact on THA's compliance with fair housing and civil rights requirements.

# **ATTACHMENT B**

## **Housing Choice Voucher Program Administrative Plan Updates**

**Chapter 20 – Project Based Vouchers** – Added language regarding Term of HAP Contract for PBV Converted under RAD. The PBV site that resulted from a RAD conversion shall have an initial HAP contract term of at 20 years. At its discretion, THA may extend this contract for up to an additional 20 years.

**Addition of Chapter 21 – Choice Mobility Policy** – The Rental Assistance Demonstration (RAD) program requires housing authorities to give residents the choice to request a Housing Choice Voucher (HCV) after living in a Project Based Voucher (PBV) property for 12 months. HUD calls this term Choice Mobility. Residents will have the opportunity to request a Housing Choice Voucher after the later of 12 months from the date of the execution of the HAP contract or 12 months from the date of move in.

THA will implement the voucher inventory cap. Each calendar year, the HCV program will make 75% of new HCV units available to families exercising Choice Mobility from its 13 covered projects transitioning into PBV through RAD. THA will establish an agency wide Choice Mobility waiting list for times when there are more requests for vouchers than vouchers available due to the cap.

Residents will be notified at move in and as part of the annual recertification process on the Choice Mobility options.

The Rental Assistance Department will maintain the Choice Mobility waiting list and screen families for the HCV program using the same criteria for all families.

### **CHAPTER 21 CHOICE MOBILITY POLICY**

As part of the Rental Assistance Demonstration (RAD), HUD requires Housing Authorities to give residents the choice to request a Housing Choice Voucher after living in a Project Based Voucher (PBV) property for 12 months. HUD calls this “Choice Mobility”. When THA transitions Public Housing properties to PBV, the Choice Mobility policy would be followed as outlined in this Chapter.

#### **I. DEFINITIONS:**

1. Covered Project: Any Public Housing property that has converted to the Project Based Voucher (PBV) program through RAD.
2. Choice Mobility: The opportunity for families to request a Housing Choice Voucher (HCV) and move into the private rental market with voucher assistance.
3. Turnover Caps: The maximum number of families that can receive a voucher in a calendar year. PHAs can establish caps for the maximum number of families that can receive a voucher from each property in the calendar year. PHAs can also establish caps for the number of vouchers from all properties combined that can receive a voucher in a calendar year.

#### **II. ELIGIBILITY AND VOUCHER CAPS**

HUD seeks to provide all residents of Covered Projects with viable Choice options. The Housing Choice Voucher (HCV) program provides the most options for families to choose where they want to live within that housing authority’s jurisdiction.

PHAs that are applying to convert the assistance of a project to PBV are required to provide a Choice-Mobility option to residents of Covered Projects in accordance with the following:

- A. Resident Eligibility.** Residents have a right to move with tenant-based rental assistance (e.g., Housing Choice Voucher (HCV)) the later of: (a) 12 months from the date of execution of the HAP or (b) 12 months after the move-in date.
- B. Voucher Inventory Turnover Cap.** Recognizing the limitation on the availability of turnover vouchers from year to year, a voucher agency would not be required, in any year, to provide more than one-third of its turnover vouchers 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.

### **THA Policy**

THA will provide all residents the opportunity to request a Housing Choice Voucher after the later of a) 12 month from the date of the execution of the HAP contract, or b) 12 months from the date of move in.

- If a family moves from one covered project to another covered project, their 12-month clock resets. These families will have to wait for 12 months from the date of move in to the new property, before they can exercise Choice Mobility.
- If a family transfers within the same covered project, their 12-month clock does not reset. They will be eligible to request a Choice Mobility voucher at the later of: (a) 12 months from the date of execution of the HAP or (b) 12 months after the move-in date.
- A family may request the choice mobility voucher at any time after completing the 12-month requirement and remain eligible if they continue living at the same covered project.
- A family that receives a Choice Mobility voucher, but allows it to expire without using it, can request another Choice Mobility voucher. However, they must wait 1 year from the date of the issuance of the expired voucher before requesting another Choice Mobility voucher. When they do request again, they will start the process from the beginning and are subject to any waiting lists in place at the time.

THA will implement the voucher inventory cap. Each calendar year, the HCV program will make 75% of new HCV units available to families exercising Choice Mobility from any of its 13 covered projects transitioning into PBV through the Rental Assistance Demonstration (RAD). THA will establish an agency-wide Choice Mobility waiting list for times when there are more requests for vouchers than vouchers available due to the cap.

THA will not implement the project turnover cap.

The HCV program also provides the opportunity to move to other parts of the country by exercising the portability options. Families will be required to follow the housing authority's guidelines regarding when they can exercise the portability options.

### **THA Policy**

To be eligible for the Choice Mobility option, families must live in Tulsa, in a THA owned PBV property for at least 1 year. These families meet THA's HCV program requirements and are eligible to exercise portability when they first receive a voucher.

## **III. NOTIFICATION OF ELIGIBILITY**

In keeping with HUD's goal to provide viable Choice Mobility options to residents of all covered projects, PHA's should provide clear notification and explanation of the Choice Mobility options available to them.

### **THA Policy**

At the time of the initial lease signing, THA will provide a copy of the Choice Mobility policy to the family and explain the Choice Mobility options. THA will provide clear direction and guidance regarding how to request a Choice Mobility voucher. Residents will be asked to sign a certification indicating that they received the Choice Mobility policy.

In addition, THA will provide a written notification to the residents as part of the 120 Day recertification letter that each family receives before their annual recertification appointment.

If anything changes in the method for requesting the Choice Mobility voucher, THA will provide written notification to the residents at least 30 days in advance of the change becoming effective.

#### **IV. WAITING LIST**

PHA's that establish a voucher turnover cap are required to create a waiting list for families that request the Choice Mobility voucher.

##### **THA Policy**

THA will establish a Choice Mobility waiting list for all eligible families that request a voucher. The wait list will be managed by THA's Rental Assistance Department. Since THA is not implementing a project turnover cap, there will be no project specific waiting lists. Eligible families that request the voucher will be placed directly onto the Choice Mobility waiting list.

THA will remove families from the Choice Mobility waiting list who move out of the covered project before receiving a voucher.

- If a family moves out of the covered project into the private rental market after being placed on the Choice Mobility waiting list, they are no longer eligible for the voucher and their name will be removed from the Choice Mobility wait list.
- If a family moves from one covered project to another covered project after being placed on the Choice Mobility waiting list, their 1 year clock resets. They will be removed from the Choice Mobility waiting list. They can re-apply once they have lived at the new covered project for 1 year.

Families that are already on the regular HCV waiting list will be allowed to request a Choice Mobility voucher if they are eligible. Families will be allowed to keep their place on both lists until one of the following happens:

- The family moves out of the covered project and is no longer eligible to be on the Choice Mobility list. The family will be removed from the Choice Mobility waiting list, but maintain their position on the regular HCV waiting list.
- The family voluntarily withdraws their name from one or both lists.
- The family receives a voucher and exercises the voucher by leasing up in the voucher program. The family will then be removed from the other list.
  - If a family receives a voucher through the regular HCV waiting list, but does not exercise the voucher (i.e. lease up in the voucher program), they will remain on the Choice Mobility waiting list.

#### **V. EXERCISING THE CHOICE MOBILITY**

To ensure that all residents at all covered projects have an equal and fair opportunity to request and receive a Choice Mobility voucher, PHAs should provide clear guidance and instructions regarding how to apply for the voucher.

##### **THA Policy**

To maintain a safe, orderly and fair process for families to request a Choice Mobility voucher, THA will implement the following:

- **Voucher Request:**
  - When a family is eligible to request a voucher, they must do so in writing using the voucher request form provided at the property
  - The written request must be submitted to the management office at the covered property.
  - Once received, the property management staff will forward the request to the Rental Assistance Department to be placed on the Choice Mobility waiting list.
  
- **Acknowledgement of Request:**
  - Once the request is received and processed onto the Choice Mobility waiting list, the Rental Assistance Department will send the family a notice acknowledging receipt of the voucher request.
  - This is the family's confirmation that they are on the Choice Mobility wait list.
  - The acknowledgement of request will be sent to the family within 10 business days of receipt of the request.
  
- **Random Sorting:**
  - Once there are families on the Choice Mobility waiting list, THA will select 1/3 of its monthly draw from the Choice Mobility waiting list.
  - Before each draw, THA will conduct a random sort of the Choice Mobility waiting list.
  - The random sort protects each individual property from high volume resident turnover, while providing each family an equal opportunity to receive a voucher.

When a family is drawn from the Choice Mobility waiting list, they will be invited to attend the Housing Choice Voucher (HCV) program eligibility interview.

## **VI. SCREENING PROCESS FOR THE CHOICE MOBILITY HCV VOUCHER**

To receive a Housing Choice Voucher, families will be required to meet all the eligibility requirements for the HCV program in effect at the time of their eligibility processing. These requirements can be found in the HCV Administrative Plan.

### **THA Policy**

THA will screen all Choice Mobility families using the same criteria as for all other families. However, THA will streamline the eligibility determination process in the following ways:

- THA will use the certifications of identification, age, social security number and citizenship that it already has on file for the family.
- THA will review the most recent certification and 50058 for basic information about the family composition and annual household income.
- THA will only require new verification of income if the verification for the most recent certification are too old to meet the criteria for the HCV program.

If eligible to receive a voucher, families will follow the HCV program rules and guidelines for using the voucher. Families are reminded of the following:

- **The voucher has an expiration date.** If extensions are available, families must follow the HCV program guidelines in effect at that time to request an extension. Failure to use the voucher before it expires will result in loss of the voucher.

- **Receipt of a voucher is not a guarantee that the family will be able to find a place to use the voucher.** Landlords have their own screening criteria which families will have to meet to be able to live at that property.
- **The family's lease at their current property requires at least 30 day's notice to vacate.** The family must provide this notice to their current property management staff.

## **VII. TRANSITIONING FROM PROJECT BASED VOUCHER PROGRAM TO THE HOUSING VOUCHER PROGRAM**

When transitioning from PBV to the HCV program with a Choice Mobility voucher, program participants are required to fulfill their obligations to the terms of the PBV lease as well as all HCV requirements. Families are not allowed to receive assistance from both programs at the same time. To assist with the transition process and prevent duplicate assistance, PHA's should develop policies and guidelines to ensure that both programs requirements are met.

### **THA Policy**

Residents at a THA PBV property will be required to complete the following when transitioning to THA's HCV program with a choice mobility voucher:

- Remain current on all rent, fees or other balances owed to the PBV property.
  - Families with outstanding debts who are in a repayment agreement and who are current on their payments within the agreement are considered eligible.
  - Families with active repayment agreements must continue to make all payments until the balance is paid in full or risk losing their voucher assistance.
- Provide at least 30 days' notice of their intent to vacate the unit to the property management.
- Participate in the move out inspection.
- Turn in their keys to the property management.
- Pay all move out expenses that may be charged after moving to their new home with voucher assistance.
  - If necessary, repayment agreements can be established to pay any outstanding move out balances.
  - Failure to pay the move out balance or to remain current in any repayment agreements that are established is grounds for termination of the family's voucher assistance.
- Pay all moving expenses related to the move from the PBV property to their voucher assisted unit.

THA and PBV property staff will work to facilitate this process by doing the following:

- Communicate between departments information related to the issuance of the voucher, move out notices, voucher extensions and specific dates of move out/move in.
  - Note: Coordination of communication between departments does not remove any of the family's obligations.
- Communicate the move out date from the PBV program to the HCV Intake Team to prevent the overlapping of assistance.
  - The move out from PBV will not be effective until the property manager receives the keys from the resident family.
  - The family will be required to pay the full rental cost for any days that they have moved in to their new unit before returning the keys to the PBV property management.
  - The voucher assistance will not start until the day after the family provides the keys to the PBV property management.