

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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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**- APHA 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 exceeds 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.

A.	PHA Information.																										
A.1	<p>PHA Name: <u>Housing Authority of the City of St. Petersburg</u> PHA Code: <u>FL002</u> PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2017</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>371</u> Number of Housing Choice Vouchers (HCVs) <u>3,581</u> Total Combined <u>3,952</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information 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 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.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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B.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs. <input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources. <input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination. <input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs. <input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention. <input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy. <input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation. <input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>(c) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>See Attachment 1</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods. <input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development. <input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance. <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD. <input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. <input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(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.</p> <p>See Attachment 2</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>See Attachment 3</p>
B.4.	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
Other Document and/or Certification Requirements.	

C.1	<p>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</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>
C.2	<p>Civil Rights Certification.</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>
C.3	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input 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>
C.4	<p>Certification by State or Local Officials.</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>
D	<p>Statement of Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
D.1	<p>Capital Improvements. 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>See HUD form 50075.2 approved by HUD on June 13, 2016.</p>

Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section.

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory**, **Number of Public Housing Units and or Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. ([24 CFR §903.23\(4\)\(e\)](#))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

B. Annual Plan.

B.1 Revision of PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. [24 CFR §903.7\(a\)\(1\)](#) and [24 CFR §903.12\(b\)](#). Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. [24 CFR §903.7\(a\)\(2\)\(ii\)](#) and [24 CFR §903.12\(b\)](#).

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to [24 CFR §903.2\(b\)\(2\)](#) for developments not subject to deconcentration of poverty and income mixing requirements. [24 CFR §903.7\(b\)](#) Describe the PHA’s procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. [24 CFR §903.7\(b\)](#) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. ([24 CFR §903.7\(b\)](#)) Describe the unit assignment policies for public housing. [24 CFR §903.7\(b\)](#)

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. ([24 CFR §903.7\(c\)](#))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. ([24 CFR §903.7\(d\)](#))

Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. ([24 CFR §903.7\(k\)](#)) and [24 CFR §903.12\(b\)](#).

Safety and Crime Prevention (VAWA). A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. ([24 CFR §903.7\(m\)\(5\)](#))

Pet Policy. Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. ([24 CFR §903.7\(n\)](#))

Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. Should the PHA fail to define ‘significant amendment/modification’, HUD will consider the following to be ‘significant amendments or modifications’: a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan); or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD’s website at: [Notice PIH 1999-51](#). ([24 CFR §903.7\(r\)\(2\)\(ii\)](#))

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark “yes” for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark “no.”

Hope VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Demolition and/or Disposition. Describe any public housing projects owned by the PHA and subject to ACCs (including name, project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD’s website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Conversion of Public Housing. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.4 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements

C.1 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 SM-HP.

C.2 Civil Rights Certification. Form HUD-50077 SM-HP, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))

C.3 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.4 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15)

D. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))

D.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: “See HUD Form 50075.2 approved by HUD on XX/XX/XXXX.”

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. 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.

Public reporting burden for this information collection is estimated to average 16.64 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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



Attachment 1

B1. Revision of PHA Plan Elements, Part c

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

Deconcentration of Poverty

It is the policy of the Housing Authority to provide for deconcentration of poverty and income mixing by targeting higher income tenants into areas where lower income residents reside and lower income tenants into areas where higher income residents reside.

SPHA shall conduct an annual analysis of the incomes of the families residing in the Public Housing developments to determine the established income range (EIR). The income analysis shall be conducted as follows:

- **Step 1** - SPHA shall determine the average household income for both developments by taking the aggregate total of all household income and dividing by the total occupied households.
- **Step 2** - SPHA shall then determine the average income of each development by taking the total of all household income in that development and dividing by the total occupied units in that development.
- **Step 3** – The established income range (EIR) shall be calculated as 85% to 115% of the aggregate average household income for both developments.
- **Step 4** – The average household income for each development shall then be compared to the EIR to determine if the development is low income or high income.

The EIR will determine if additional income mixing strategies need to be developed and implemented.

Screening/Continued Eligibility: When applicants are pulled from the public housing wait list, part of the screening process will be for the families to enroll in the Pinellas County Urban League's Financial Empowerment class. In addition, the class will also be a part of the annual recertification classes for participants. This relationship with the Pinellas County Urban League will be memorialized in a Memorandum of Understanding.

Verification of Social Security Numbers: Per Notice PIH 2016-05, for the Housing Choice Voucher Program, SPHA will give a ninety (90) day period during which an applicant family may become a participant, even if the family lacks the documentation necessary to verify the Social Security Number of a family member under the age of six (6). An extension of one additional ninety (90) day period must be granted if SPHA determines that, in its discretion, the applicant's failure to comply was due to circumstances that could not reasonably have been foreseen and were outside the control of the applicant.

Definition of Extremely Low-Income Families: Per Notice PIH 2016-05, SPHA defines extremely low-income families as very low-income families whose income does not exceed the higher of 30 percent of the area median income or the federal poverty level. SPHA will submit an Elderly Designation Plan for Sunset Oaks Apartments, 4888 21st Ave. N., due to the need for affordable housing for seniors.

Preferences: Because SPHA is proposing to dispose of Jordan Park, a 237 unit public housing development, and the receipt of vouchers from the HUD office is not guaranteed, SPHA is amending its wait list preferences for the Housing Choice Voucher program. Residents of a public housing complex that has been approved for demolition/disposition by the HUD office will be added to the top of the Housing Choice Voucher wait list, even if the list is not open.

Family Self Sufficiency: SPHA plans to apply for any Family Self Sufficiency programs that may come available during the 2017 fiscal year. SPHA's mission is to promote resident self sufficiency.

Elderly Designation for Sunset Oaks: SPHA is submitting an Elderly Designation Plan for Sunset Oaks Apartments to be set aside for elderly families, only. However, in accordance with HUD regulations and SPHA's Admissions and Continued Occupancy Policy, in the event that there is not a sufficient number of applicants age 62 or older, SPHA may select near-elderly families to reside at the property. According to HUD regulations, near-elderly is defined as individuals age 50 or older, with or without a disability.

Financial Resources

SPHA has recently created a 501c3 nonprofit entity called RISE Development Corporation. It is the intention of SPHA to use this entity as an affiliate of the housing authority and create separate Limited Liability Companies (LLCs) underneath its umbrella for each property that we own. SPHA may also apply for grants, 4% tax credits, 9% tax credits, Housing Trust Funds, and other funding, as it becomes available.

SPHA also has plans to create a for profit entity for property management, HQS inspections, and other aspects of operating market rate, affordable, and/or low-income housing.

Rent Determination

Exclusion of Mandatory Education Fees from Income: Per Notice PIH 2016-05, SPHA amends the definition of 'income' to exclude from calculations of individual income any financial assistance received for mandatory fees and charges (in addition to tuition). This change only affects Section 8 programs.

Earned Income Disregard: Per Notice PIH 2016-05, SPHA amends the time period during which a family member is eligible to receive the benefit of the earned income disregard (EID) to twenty-four (24) straight months.

Public Housing Rents for Mixed Families: Per Notice PIH 2016-05, SPHA will use the established flat rent applicable to the units to calculate public housing rents for mixed families.

Biennial Inspections and the use of Alternate Inspection Methods and Inspection Timeframes: Per Notice PIH 2016-05, SPHA may choose to conduct HQS inspections biennially rather than annually for both the HCV and PBV programs. SPHA may also use alternative inspection methods for periodic inspections, such as inspections performed by HUD or conducted pursuant

to the HOME Investment Partnerships (HOME) program or housing financed using Low-Income Housing Tax Credits (LIHTCs).

Housing Quality Standards Reinspection Fee: Per Notice PIH 2016-05, SPHA will continue to charge owners a reinspection fee for a third HQS inspection.

Family Income and Composition: Regular and Interim Examinations: Per Notice PIH 2016-05, SPHA will no longer conduct a reexamination of income whenever a new family member is added.

Utility Payment Schedules: Per Notice PIH 2016-05, SPHA will use the appropriate utility allowance for the lesser of the size of the dwelling unit actually leased by the family or the voucher size issued, as determined under SPHA subsidy standards.

Homeownership Programs

SPHA plans to create a Homeownership Voucher Assistance program for a small number of applicants or current voucher participants. SPHA may choose to partner with other entities, such as the City of St. Petersburg, Neighborhood Home Solutions, Pinellas County, or others, for credit counseling, down payment assistance, second mortgages, etc., in order to help the client be successful in the program.



Attachment 2

B2. New Activities, Part b

Mixed Finance Modernization or Development

SPHA plans to create Wounded Warrior Housing for wounded veterans via acquisition or construction of Project Based Section 8 units, using public housing sale proceeds, in accordance with 24 CFR 970.19 (e)(2)(i). SPHA also plans to create additional affordable housing using 4% tax credits, bonds, 9% tax credits, Housing Trust Funds, and/or other funding, as it becomes available.

SPHA plans to create additional housing either via mixed finance, Project-Based Section 8 vouchers, Low-Income Housing Tax Credits, bonds, or other financing options to create family housing and/or senior housing. There is a great need for additional affordable housing in the City of St. Petersburg. In addition, due to the large elderly population, additional senior housing is also needed.

SPHA plans to develop additional housing through its non-profit, RISE Development Corporation. RISE will become a 501c3, allowing SPHA to lessen its dependence on HUD's funding.

Demolition and/or Disposition

SPHA plans to dispose of its single scattered site house, located at 4326 14th Avenue South in St. Petersburg. SPHA plans to sell the property to the existing tenant. In the event that the existing tenant does not or will not qualify, SPHA may relocate the resident and offer the house for sale to another existing public housing resident first, and then a Section 8 participant, or other resident at 80% or below of the Area Median Income. SPHA will include the Scattered Site house as a part of the RAD portfolio and dispose of it via the de minimus option.

SPHA intends to dispose of Jordan Park Apartments (1245 Jordan Park Street South, FL002000003) in order to recapitalize the property and finance rehabilitation of the units. Disposition will either be through voluntary conversion to Housing Choice Vouchers, a Section 18 disposition action, or a mixed finance transformation action. Jordan Park is in need of major rehab, estimated at \$27 Million over the next twenty (20) years, with \$9 Million needed for immediate repairs. The property cannot be maintained as public housing.

Conversion of Public Housing to Tenant Based Assistance

SPHA is taking ownership of Jordan Park Apartments (1245 Jordan Park Street South, FL002000003), a Hope VI development. SPHA will be pursuing Voluntary Conversion for the property and Project Based Vouchers. Jordan Park is in need of major rehab, estimated at \$21 Million over the next twenty (20) years, with \$9 Million needed for immediate repairs. SPHA plans to finance the repairs via 4% tax credits, bonds, and Housing Trust Funds through Pinellas County. The property cannot be maintained as public housing.

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Conversion of Public Housing to Project-Based Assistance under RAD

SPHA will convert its remaining 134 public housing units under RAD. Detailed information is found in Attachment 2.

Project Based Vouchers

SPHA intends to project based up to 20% of its total voucher allocation for the recapitalization of Jordan Park if tenant protection vouchers are not available and for other new development projects. This is consistent with the PHA Plan as it will assist in maximizing HCV lease up and improving quality of housing.

SPHA plans to create Wounded Warrior Housing for wounded veterans via acquisition or construction of Project Based Section 8 units, using public housing sale proceeds, in accordance with 24 CFR 970.19 (e)(2)(i). SPHA will need to solicit a Request for Proposals (RFP) for the Project Based Vouchers. SPHA may choose to do a solicitation for regular Project Based Vouchers or VASH Project Based Vouchers.

Units with Approved Vacancies for Modernization

SPHA has several projects planned with its Capital Fund grants that may require units to be taken offline as approved vacancies for modernization. All work has been approved in the various capital fund budgets and includes, but is not limited to, kitchen and bathroom remodels, flooring replacements, etc.

Other Capital Grant Programs

SPHA plans to apply for Emergency Safety and Security Grants, as they become available.



Attachment 3

B3. Progress Report

1. Improve marketing, public relations, and community relations

- SPHA continues to make progress toward this goal. Our bi-annual newsletter, The Housing Homefront, is distributed in an electronic format to a host of stakeholders and ties to the agency's website (www.stpeteha.org). Both of these platforms are utilized to share agency news and accomplishments with the general public. In addition, SPHA distributes a regular landlord newsletter, specifically targeted for HCV landlords, which includes training and program information. SPHA also distributes a monthly newsletter to public housing tenants to keep them informed of agency activities, requirements, and plans.
- SPHA has an ongoing press release program where staff pitches positive stories to local reporters and regularly sends press releases dealing with positive achievements.
- SPHA has a 15 minute radio talk show once a month on a local radio station. Staff uses this time to educate and update listeners about SPHA programs and services. Also, staff has identified civic organizations, neighborhood associations, and other potential stakeholders and works to foster relationships with them as part of our ongoing community outreach plan. Executive staff and Commissioners are available to make presentations to these groups through SPHA's Speakers Bureau.
- SPHA staff is working to identify residents who are interested in continuing their education and to provide them with information about scholarships offered by national housing industry organizations. To date, six residents have received college scholarships. This year, we also partnered with St. Petersburg College to offer more local scholarship opportunities, specifically for SPHA public housing residents.
- SPHA staff regularly submits our programs for housing industry "Best Practices" awards. We received First Runner-Up and Honorable Mention designations for two of our programs in the Housing Authority Insurance Group's 2015 Best Practices and Housing Authority Risk Retention Innovation Awards.

2. Develop and execute property strategy

- SPHA disposed of its commercial properties in 2015 and has plans to dispose of its sole scattered site single family home located at 4326 14th Avenue South. SPHA plans to offer the home for sale to the existing public housing resident.
- SPHA plans to acquire and/or develop additional affordable housing using some or all of the following: public housing sales proceeds (which may be used for Project Based Section 8 units), 4% tax credits, 9% tax credits, bonds, financing through the Pinellas County Housing Finance Authority, grants, mortgages, and/or other sources.

3. Develop and implement Veterans' Housing Initiative

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- SPHA plans to acquire, acquire with rehab, or construct Wounded Warrior Housing for wounded veterans. The units may include some or all of the following: public housing units, Project Based Section 8 units, affordable units and/or possibly market rate units. A portion of the units will be handicap-accessible, with Wounded Warriors in mind. SPHA may consider partnering with another Housing Authority or organization on this project. SPHA may also consider issuing a Request for Proposals from developers or other partners. If doing Project-Based Vouchers, SPHA plans for the project to serve ‘qualified families,’ which may include elderly and/or disabled families or those receiving supportive services.
 - SPHA may choose to issue a Request for Proposals for Project Based Vouchers. SPHA may project base up to 20% of its units.
4. Develop succession plan
 - SPHA has completed a preliminary succession plan that details the current agency needs and implements a plan on how to meet those needs.
 - A few members of SPHA staff may plan to retire within the next 1-5 years, and training has commenced with current staff for potential replacements.
 5. Develop funding gap strategy
 - SPHA plans to utilize other funding sources outside of HUD, which may include tax credits, bonds, grants, creating a nonprofit (RISE Development Corporation), and creating a for profit entity to generate revenue through expertise (training other housing authorities and outside entities for a fee, providing property management to private organizations, conducting HQS inspections for neighboring housing authorities, etc.).
 - SPHA plans to submit an application for the Moving To Work (MTW) Program when the opportunity arises. Becoming a MTW agency will allow SPHA to move funds to the areas in need in order to better operate our programs and serve the community.
 6. Continue Commissioner certification training and development guidelines and processes
 - All new Commissioners are encouraged by the Board to receive professional third-party training on the basics of serving on a Public Housing Authority Board of Commissioners. A New Commissioner training took place in 2016, as well as three Commissioners attended national conferences. SPHA staff members also provide presentations on SPHA’s current operations to all new Commissioners.
 7. Continue to work on three (3) Legislative actions as joint projects with area housing authorities
 - a) Stop ‘Pay to Stay’ – national resolution
 - b) ‘5 and up’ (time limits) – national resolution
 - c) Agency name change – state resolution

The Chief Executive Officer has started discussions with other local housing authorities to create a local association for the Tampa Bay area in order to address the needs of our locale with our Congressional representatives.

2016 ANNUAL PLAN

RENTAL ASSISTANCE DEMONSTRATION

The SPHA Housing Authority (SPHA) has submitted an application for the Rental Assistance Demonstration (RAD) program. As a result, SPHA will be converting all Public Housing to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-2 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 1.6C and 1.6D of PIH Notice 2012-32. These residents' rights, participation, waiting list and grievance procedures are appended to this attachment. Additionally, the St. Petersburg Housing Authority is currently compliant with all Fair Housing and Civil Rights requirements and is not under a Voluntary Compliance Agreement.

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

Below please find the specific information related to the Public Housing Development selected for RAD:

RAD INFORMATION

Following is specific information related to the Public Housing Developments selected for RAD:

Development #1			
Name of PH Development:	Conversion Type:	EPC: No	Transfer of Assistance (if yes, put the location if known:
Clearview Park, Disston Place, Gateway Place, Romaine, Sunset Oaks	PBV	N/A	NO
Total Units:	Pre-RAD Unit Type (Family, Senior, etc.):	Post-RAD Unit Type if different (Family, Senior, etc.)	Capital Fund Allocation of Development (annual Cap Fund grant divided by total number of public housing units in PHA, multiplied by total number of units in project):
134	FAMILY AND SENIOR	FAMILY AND SENIOR	
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations,)

Studio/Efficiency	0	0	0
1 Bedroom	48	48	0
2 Bedroom	83	83	0
3 Bedroom	3	3	0
4 Bedroom	0	0	0
5 Bedroom	0	0	0
6 Bedroom	0	0	0
If performing a Transfer of Assistance, explain how transferring waiting list.	N/A		

Identification and obligation status of public housing funds	Public Housing Operating Subsidy and Capital Funds will be utilized to fund the first calendar year of RAD HAP subsidy pursuant to the Initial Year Funding tool applicable at the time of the RAD closing. Any additional public housing funds will remain with the central office building.
Evidence of consultation with residents	Attached is documentation of consultation with Residents regarding the RAD program.
Description of PHA's proposed future use of the development	N/A
Relocation Plan	N/A
Choice Mobility	After one year residing in the RAD unit, a family may apply for a Choice Mobility voucher. SPHA will create a waiting list for RAD Choice Mobility applicants based on date of application. A tenant based voucher will be made available to the Choice Mobility applicants when one becomes available through normal program turnover. SPHA will limit the Choice Mobility vouchers to 75% of annual turnover vouchers.

Significant Amendment Definition:

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

- Changes to the Capital Fund Budgets produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and/or rehabilitation plan for each approved RAD conversion; and
- Changes to the financing structure for each approved RAD conversion.

PROJECT BASED VOUCHERS RESIDENT RIGHTS AND PARTICIPATION

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

2. Right to Return. Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete.

Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.

3. Renewal of Lease. Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR §983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.

4. Phase-in of Tenant Rent Increases. If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 years. To implement this provision, HUD is waiving section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only 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 below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section “standard TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058

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 and the standard TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.

5. Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Current PH FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any PH FSS funds granted previously or pursuant to the FY 2013 PH FSS NOFA, to serve those FSS participants who live in units converted by RAD and who will as a result be moving to the HCV FSS program, subject to the following:

- a. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.
- b. If a PHA does not have an HCV FSS program, the PHA must establish an HCV FSS program and convert the PH FSS program participants at the covered project into their HCV FSS program. PHAs are not required to offer enrollment in FSS to residents in converting projects and other HCV participants, other than to residents in converting projects that were enrolled in the PH FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984 and in accordance with the participants’ contracts of participation. However, residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant’s failure to comply with the contract of participation. Consequently, 24 CFR984.303(b)(5)(iii) does not apply to FSS participants in converted properties.

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 public housing. ROSS-SC grants, nor will its residents be eligible to be served by future public housing ROSS-SC grants.

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

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

a. Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:

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

b. Grievance Process. HUD is incorporating additional procedural rights to comply with the requirements of section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:

- i.** 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 PHA (as 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.
 - 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.

- For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.
- ii. An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator.

This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.

- iii. The PHA (as owner) give residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- iv. The PHA (as owner) provide opportunity for an informal hearing before an eviction.

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

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

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

9. Capital Fund Education and Training Community Facilities (CFCF) Program. CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as "PHA residents" for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents

PBV: Other Miscellaneous Provisions

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

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

3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). Under existing PBV program rules, projects that qualify as "existing housing" under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as "existing housing." Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.

4. Establishment of Waiting List. In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the converted project's initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants,

PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA's policies for waiting list management, including the obligation to affirmatively further fair housing.

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups

(e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the ~~agency's centralized public housing~~ waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).

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

5. Mandatory Insurance Coverage. The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.

6. Agreement Waiver. For public housing conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.

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

8. Administrative Fees for Public Housing Conversions. For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b).

During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

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