

DISTRICT OF COLUMBIA HOUSING AUTHORITY

FY2026 Amended Moving to Work Plan



Keith Pettigrew
Executive
Director

Adopted by DCHA Board of Commissioners: September 15, 2025

Submitted to HUD: December 3, 2025

HUD Approved: January 14, 2026

DISTRICT OF COLUMBIA HOUSING AUTHORITY

300 Seventh Street Southwest Washington DC 20024

Phone: 202-535-1000

Email: info@dchousing.org Website: www.dchousing.org



Board of Commissioners

Raymond Skinner, Board Chair

Denise Blackson

Leroy Clay III

Rosa Burbridge

James A. Dickerson

Ronnie Harris

Christopher Murphy

Jennifer Reed

Theresa Silla

This Moving to Work (MTW) Annual Plan is prepared in accordance with the “Amended and Restated Moving to Work Agreement” between the U.S. Department of Housing and Urban Development and District of Columbia Housing Authority. This agreement was signed by both parties in September 2010. The agreement was extended by Congress and is scheduled to expire at the end of the Housing Authority’s 2038 Fiscal Year. The required elements of the Annual MTW Plan and Annual MTW Report are detailed in HUD Form 50900 (OMB Control Number: 2577-0216 Expiration Date: 8/31/2027).

Table of Contents

Section I. Introduction	5
A. Overview	5
B. Long-Term MTW Goals and Objectives	5
C. Short-Term MTW Goals and Objectives	7
D. Significant Amendment Definition	7
Section II. General Housing Authority Operating Information	9
A. Housing Stock Information	9
B. Leasing Information	22
C. Wait List Information	24
Section III. Proposed MTW Activities	26
Initiative 35: Voucher Success Fund (proposed)	26
Initiative 36: Affordable Housing and Preservation Development Fund (proposed)	27
Initiative 37: Extension of RAD Resident Rights to Section 18 Program (proposed)	28
Initiative 1: Modifications to DCHA’s Project-Based Voucher Program (re-proposed)	31
Initiative 12: Rent Simplification and Collections (re-proposed)	33
Section IV. Approved MTW Activities/Initiatives	35
A. Summary of MTW Activities/Initiatives	35
B. Approved MTW Initiatives	36
Initiative 3: Modifications to HCV Homeownership Program	36
Initiative 4: Streamlined Recertification Process	38
Initiative 7: DCHA Subsidiary to Act as Energy Services Company	39
Initiative 8: Local Payment Standards Policy	40
Initiative 11: Site Based Waiting Lists	41
Initiative 17: Re-Inspection Fee and Abatement Process for HQS Violations	42
Initiative 18: Creation of Local Authorization and Release of Information Form with an Extended Expiration to Support the Biennial Recertification Process	43
Initiative 20: Enhance Neighborhood Services within Public Housing Communities	44
Initiative 23: Encourage the Integration of Public Housing Units into Overall HOPE VI Communities	45
Initiative 25: Local Blended Subsidy	45
Initiative 32: Modifications to DCHA Self-Sufficiency Program – Pathways to Self-Sufficiency	47

Initiative 33: Waiver for Third-Party Housing Quality Standards (HQS) Inspections	51
Initiative 35: Local Elderly Family Definition	51
B. Activities Not Yet Implemented.....	53
C. Activities on Hold	53
D. Closed Out Activities	53
Section V. Planned Application of MTW Funds	57
A. Planned Application of MTW Funds	57
B. Planned Application of Unspent Operating Fund and HCV Funding.....	59
C. Local Asset Management Plan.....	59
D. Rental Assistance Demonstration (RAD) Participation	60
Section VI. Administrative	62
A. Board Resolution and Certifications of Compliance.....	62
B. Documentation of Public Process.....	69
C. Planned and Ongoing Evaluations	81
D. Lobbying Disclosures	82
Appendix A. Local Asset Management Program	84
Appendix B. Units Occupied by Police Officers	88
Appendix C: Summary of Admissions and Continued Occupancy Policy (ACOP) and Administrative Plan Updates.....	89
Appendix D. RAD Significant Amendment for Barry Farm Rental Flats.....	90
Appendix E. RAD Significant Amendment for Park Morton Phase 2.....	97
Appendix F: RAD Significant Amendment for Highland Additions	104
Appendix G: RAD Significant Amendment for Hopkins Apartments	111
Appendix H: RAD Significant Amendment for James Creek	118
Appendix I: RAD Significant Amendment for Lincoln Heights	125
Appendix J: RAD Significant Amendment for Stoddart Terrace	132
Appendix K: RAD Significant Amendment for Syphax Gardens.....	139
Appendix L: RAD Significant Amendment for Woodland Terrace	146

Section I. Introduction

A. Overview

The District of Columbia Housing Authority (“DCHA” or “Agency”) is an independent public agency committed to addressing the housing needs of our community’s most vulnerable populations. The Agency is the largest landlord in the District, serving nearly 6,000 households in public housing, approximately 14,000 households in the federal Housing Choice Voucher Program, and more than 7,000 households in locally administered voucher and subsidy programs.

The DCHA’s Moving to Work (MTW) Annual Plan provides information on DCHA’s planned activities under the MTW Demonstration Program during Fiscal Year 2026, i.e., the period from October 1, 2025 to September 30, 2026.

MTW is a demonstration program authorized by Congress, through which DCHA and other participating agencies nationwide have the flexibility to waive certain statutes, including parts of the 1937 U.S. Housing Act, and HUD regulations in order to design and test approaches for providing housing assistance that address one or more of the following statutory objectives:

- Reduce cost and achieve greater cost effectiveness in federal expenditures.
- Provide incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and
- Increase housing choices for low-income families.

DCHA has been a participant in the MTW program since July 2003 pursuant to an MTW Agreement with the U.S. Department of Housing and Urban Development (HUD). The MTW Agreement, as amended, describes the authority and flexibility granted to DCHA under the MTW program, along with requirements for participation. DCHA’s MTW Agreement with HUD was recently extended through 2038.

The FY2026 MTW Annual Plan includes information on DCHA’s housing inventory, waiting list, finances, planned and ongoing MTW activities, and other information required in the HUD Form 50900, which details the reporting requirements applicable to MTW agencies.

B. Long-Term MTW Goals and Objectives

DCHA’s mission is to provide quality affordable housing to extremely low- through moderate-income households, foster sustainable communities, and cultivate opportunities for residents to improve their lives. We are dedicated to addressing the housing needs of the District of Columbia’s most vulnerable populations including seniors, people with disabilities and families with children. As an independent public agency, DCHA provides housing assistance to nearly 10% of the District’s residents. The agency’s

work encompasses roles as a landlord, property manager, voucher administrator, and real estate developer.

As part of the initial MTW Plan submission, DCHA established five (5) strategic objectives which continue to provide the framework for MTW planning and implementation efforts in FY2026 and beyond:

- Create opportunities to improve the quality of life for DCHA residents through collaboration and partnerships.
- Increase access to quality affordable housing.
- Provide livable housing to support healthy and sustainable communities.
- Foster a collaborative work environment that is outcome driven and meets the highest expectations of the affordable housing industry.
- Effectively communicate agency accomplishments and advocate for its mission.

DCHA is committed to fulfilling its mission and strategic goals by exploring opportunities that address local housing needs and meet MTW statutory objectives. Over the long-term, DCHA will continue to leverage the flexibility provided by its MTW designation to preserve and increase affordable housing, implement program efficiencies and improve the well-being of the residents and families the agency serves.

DCHA's temporary Stabilization and Reform Board of Commissioners, which was appointed in December 2022, hired Keith Pettigrew as Executive Director effective on November 1, 2023. Since then, he has focused efforts on recruiting a new executive team, addressing outstanding corrective action items from HUD's 2022 review of DCHA operations, and developing a three-year Recovery Plan that provides a framework for preserving and expanding affordable housing and moving the agency to excellence in all areas of operations. Major objectives of the Recovery Plan over the next three-year period that will be supported using MTW flexibility include:

- Preserve or redevelop the existing public housing portfolio through conversion to Section 8 project-based assistance utilizing the Rental Assistance Demonstration (RAD) program, Section 18, RAD/Section 18 blend and other available methods and leverage DCHA's MTW and other resources to expand affordable housing opportunities.
- Achieve high rates of occupancy, meet property management and inspection standards, and provide safe and supportive living environments for residents of public housing and other affordable units owned by DCHA.
- Improve voucher utilization and provide Housing Choice Voucher program participants with a diverse range of tenant-based and project-based housing and related service options.
- Connect DCHA residents and program participants to programs and services that provide education and employment opportunities, help families build financial assets and maximize the potential for independent living and self-sufficiency.
- Improve DCHA's organizational infrastructure including data, technology, website, call center and other systems so that they are fully integrated, reliable, functionally robust, and user-friendly.

- Ensure that agency policies and procedures comply with regulatory requirements, are clear and transparent, reflect industry best practices and incorporate innovation and flexibility as allowed through MTW.

C. Short-Term MTW Goals and Objectives

In addition to implementing the Recovery Plan, DCHA's short-term MTW goals and objectives for FY2026 include:

- Deploy a portfolio-wide asset repositioning plan in consultation with residents, community stakeholders and other stakeholders. The plan will provide a framework for preserving, redeveloping and expanding affordable housing utilizing MTW flexibility and other available tools and resources.
- Successfully build new housing developed using the Restore-Rebuild (formerly Faircloth-to- RAD) program. DCHA anticipates that Park Morton Phase 2 and Barry Farms Rental Flats will close by the end of 2025 or early 2026.
- Proceed with pre-development planning, financing, and/or construction for multiple legacy public housing developments including MELVO (Montana, Elvan's, Lincoln, Villager, Ontario), Greenleaf Senior, and other housing sites.
- Enhance vacancy turnaround and voucher leasing initiatives to increase the number of households served under the MTW program.
- Implement site-based waiting lists at public housing and project-based developments in accordance with agency policies and approved MTW waivers.
- Increase resident participation in programs designed to support employment and economic self-sufficiency, financial literacy, housing mobility, first time homebuying and other positive outcomes. Program services include Community Navigators, provision of space in DCHA developments for service providers, and programming through DCHA's Workforce Development Program, Family Self-Sufficiency Program, and Rent Reporting and Credit Building Program.
- Implement a broad array of ongoing approved MTW activities summarized in Section IV that support DCHA's strategic goals and advance MTW statutory objectives, including three new MTW initiatives proposed in the FY2026 MTW Plan.

D. Significant Amendment Definition

As part of the RAD conversion initiative, a further Significant Amendment to the MTW Plan will not be required for the following RAD-specific actions:

- 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;
- Decisions to apply MTW funding or programmatic flexibility to post-conversion RAD developments;
- Decisions or changes related to the ownership and/or financing structures for each approved RAD conversion including decisions to allocate DCHA financial resources as a source of funds to support the RAD conversion initiatives;

- Changes to the construction and rehabilitation plans and scheduled for each approved RAD conversion;
- Changes to the project names or sponsor entity names;
- With respect to Faircloth to RAD conversions, decisions to reduce or increase the number of subsidized units;
- Changes in the post-conversion bedroom size distribution and/or the number of de minimis unit reductions up to the 5% permitted under RAD program rules;
- Changes to the pre-conversion bedroom size distribution and/or the project or AMP from which transfer of assistance units will be converted; and,
- Decisions to convert to either Project Based Vouchers or Project Based Rental Assistance.

DCHA will amend or modify its MTW annual plan upon the occurrence of any of the following events:

- A federal statutory or regulatory change is made effective and, in the opinion of the Authority, has either substantial programmatic or financial effects on the programs administered by DCHA, or creates substantial obligations or administrative burdens beyond the programs under administration at the start of the Plan year; provided that an MTW annual plan amendment or modification will not be required for adoption of statutory or regulatory changes in DCHA's Admissions and Continued Occupancy Plan or Administrative Plan.
- Proposed demolition, disposition, Capital Fund Financing, development, or mixed finance proposals not already identified in this plan and that are considered by HUD to be significant amendments to the Agency Plan and Capital Fund Plan.
- Any Capital Fund project not already in the Five-Year Action Plan excluding projects arising out of federally declared major disasters, acts of God beyond the control of the Authority, such as earthquakes, fire and storm damages, civil unrest, or other unforeseen significant event or changes in use of replacement reserve funds under the Capital Fund in the amount of 20% or more of the annual grant.
- Any other event that DCHA determines to be a significant amendment or modification of the approved annual plan.

Section II. General Housing Authority Operating Information

A. Housing Stock Information

1. Planned New Public Housing Units

DCHA plans to add 50 net new units of public housing to its portfolio in FY2026 through Restore-Rebuild (formerly Faircloth-to-RAD) at Barry Farm Edmondson. It is anticipated that construction at Barry Farm Edmondson will be completed and ready for lease up in late 2026. These units will exist as public housing units prior to RAD conversion. The actual number of new public housing units and bedroom size mix may vary depending on several factors including changes to financing plans and construction schedules, receipt of Low-Income Housing Tax Credits, HUD and District of Columbia processing timetables and other factors. DCHA may issue a new Request for Proposals (RFP) during FY2026 and may select additional developments for receipt of public housing Annual Contributions Contract(s) as a result of that or prior RFP(s), subject to approval of the DCHA Board of Commissioners. Due to changes in development plans and schedules, planned developments shown below may also appear in prior or subsequent Annual Plans.

Asset Management Project (AMP) Name and Number	Bedroom Size						Total Units	Population Type	# Of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Mobility	Hearing/ Vision
DC001005540 Barry Farm Edmondson	0/12	38	0	0	0	0	50	General	4	2
TOTAL	0/12	38	0	0	0	0	50		4	2

2. Planned Public Housing Units to be Repositioned

Over the coming years, DCHA anticipates removing up to 7,937 units from the agency's public housing portfolio for conversion to project-based vouchers under one of three HUD repositioning platforms: the Rental Assistance Demonstration (RAD) program for properties with approved CHAPs or through Section 18 or through a RAD/ Section 18 Blend. The planned removal initiatives are all related to DCHA's revitalization program, ongoing portfolio assessment and repositioning efforts including conversion of public housing units to project-based assistance under the RAD program, Section 18, or RAD/Section 18 blend methods. While units would be removed from the public housing program, they will be replaced in the project-based voucher program.

DCHA included the full public housing portfolio to demonstrate the agency's commitment to repositioning the full portfolio and to comply with the HUD requirement that projects are listed in the agency's annual plan prior to submitting a repositioning application to HUD. The conversion of all properties will take many years. Prior to and consistent with the selected repositioning strategy, DCHA will meet with and engage residents and the community at the affected property as required by HUD and guided by the DCHA Board-approved "Principles for Public Housing Subsidy Repositioning" in Resolution 24-16 and "Principles to Govern Redevelopment and Substantial Rehabilitation of DCHA's Properties" in Resolution 24-15.

While the table below provides an estimate of the number of units to be removed from the public housing inventory, the actual number may vary depending on timetables for HUD and District of Columbia local government approvals, project financing, RAD closings and other factors. Due to variances in development schedules and changes in development priorities, units listed below may also include units listed in prior year Annual Plans for which demolition and/or disposition has not yet occurred.

Planned Public Housing Units to be Removed		
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
DC001003090 Barry Farm	39	DCHA received approval to demolish & dispose of 454 units in in 2017 however five buildings (39 units) were declared Historic Landmarks by the D.C. Historic Preservation Board in January 2020.
DC00100 2220 Benning Terrace	274	DCHA submitted an application for Section 18 Demo/Dispo in FY24.
DC001005480 Bixby (Formerly known as The Lofts)	39	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Bixby in FY2026 or subsequent years. See Initiative #25 for additional detail.
DC001005230 Capitol Gateway	62	Capitol Gateway is a 237-unit mixed income affordable multi-family property which includes 212 replacement units. There are 151 project-based units at Capital Gateway Senior & 62 of the 86 units at Capital Gateway Family are public housing units. DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition or a RAD/Section 18 Blend in consideration for conversion for Capitol Gateway in FY2026 or subsequent years.
DC001005270 Capitol Quarters	86	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Capitol Quarters in FY2026 or subsequent years.
DC001005520 Capper Senior II (400M)	139	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Capper Senior II in FY2026 or subsequent years.
DC00100 3363 Carroll Apartments	60	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Carroll in FY2026 or subsequent years.
DC001005510 City View	30	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of City View in FY2026 or subsequent years.
DC001001600 Claridge Towers	343	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Claridge Towers in FY2026 or subsequent years. Claridge Towers has been identified as one of the 9 initial properties that will undergo renovation as part of DCHA's bond-revitalization plan, described under MTW Initiative #36.
DC00100 1460 Edgewood Terrace	89	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Edgewood Terrace in FY2026 or subsequent years.
DC001003850 Elvans Road*	20	DCHA received a CHAP under its FY2016 RAD Portfolio Award. DCHA plans to convert the property to RAD for stabilization. DCHA plans to utilize RAD, the Section 18 platform in combination with the RAD program for RAD/Section 18 blended conversion, or a Section 18 conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.
DC00100 2230 Fort Dupont Dwellings- Fort Dupont Addition-	291	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Fort Dupont in FY2026 or subsequent years.

Stoddert Terrace		
DC001001640 Fort Lincoln	120	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Fort Lincoln in FY2026 or subsequent years. Fort Lincoln has been identified as one of the 9 initial properties that will undergo renovation as part of DCHA's bond-revitalization plan, described under MTW Initiative #36.
DC001001370 Garfield Family	50	DCHA submitted an application for a Section 18 Demo/Dispo in FY2024 for the 50 units in the Garfield Family Walk-Up Buildings.
DC001001371 Garfield Senior	228	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Garfield Senior in FY2026 or subsequent years.
DC00100 5350 Gibson Plaza	53	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Gibson Plaza in FY2026 or subsequent years.
DC00100 5290 Glenncrest	61	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Glenncrest in FY2026 or subsequent years.
DC001004210/ DC001003363 Greenleaf Gardens/Addition/ Extension/Senior	493	DCHA submitted a Section 18 Disposition application for operating subsidy repositioning for the units at Greenleaf Senior, Greenleaf Gardens, Extension and Addition in FY2024. Greenleaf will be redeveloped into mixed-income housing. DCHA received a RAD CHAP for Greenleaf Senior (211 units) in FY2024 but will include building in its Section 18 disposition request in FY2024 with the rest of the property.
DC00100 1680 Harvard Towers	193	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Harvard Towers in FY2026 or subsequent years.
DC00100 3530 Highland Additions	118	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Highland Additions in FY2026 or subsequent years.
DC001005460 & DC001005461 Highland Dwellings	212	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Highland Dwellings in FY2026 or subsequent years. See Initiative #25 for additional detail.
DC00100 3300 Hopkins Apartments	158	DCHA submitted a Section 18 disposition application for Hopkins in FY2024. Hopkins Apartments has been identified as one of the 9 initial properties that will undergo renovation as part of DCHA's bond-revitalization plan, described under MTW Initiative #36.
DC001001620 Horizon House	126	DCHA submitted a Section 18 disposition application for Horizon House in FY2024.
DC00100 1700 James Apartments	141	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of James Apartments in FY2026 or subsequent years. James Apartments has been identified as one of the 9 initial properties that will undergo renovation as part of DCHA's bond-revitalization plan, described under MTW Initiative #36.
DC001001030 James Creek	242	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of James Creek in FY2026 or subsequent years. James Creek has been identified as one of the 9 initial properties that will undergo renovation as part of DCHA's bond-revitalization plan, described under MTW Initiative #36.
DC001001650 Judiciary House	263	DCHA received a RAD CHAP for Judiciary House in FY2021, with anticipated closing in FY2025. In consideration for conversion in FY2025, DCHA plans to pursue either a RAD conversion, Section 18 disposition or a RAD/Section 18 blend conversion for the property. The property will continue to be managed by DCHA or its wholly owned affiliate.

DC001001080 Kelly Miller	160	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of the Kelly Miller (Townhomes) in FY2026 or subsequent years.
DC001005190 Kenilworth	201 89 Removed	DCHA received a phased demolition approval for this site in FY2018. Resident relocation occurred for Phase 1. A total of 89 units have been demolished and removed from PIC to date. In FY2025, DCHA submitted a demolition and disposition application for Phase 2. In FY2025, DCHA will submit a Section 18 disposition application and/or RAD application to reposition the operating subsidy for the remaining properties on Phase 3.
DC00100 4361 Kentucky Courts	118	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Kentucky Courts in FY2026 or subsequent years.
DC001005210 Kentucky Courts Condos	12	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Kentucky Courts in FY2026 or subsequent years.
DC00100 3361 Knox Hill	122	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Knox Hill in FY2026 or subsequent years. Knox Hill has been identified as one of the 9 initial properties that will undergo renovation as part of DCHA's bond-revitalization plan, described under MTW Initiative #36.
DC001002400 Langston Additions	35	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Langston Additions in FY2026 or subsequent years.
DC001002250 Langston Terrace	274	DCHA submitted a Section 18 disposition application for Langston Terrace in FY2024.
DC001001391 LeDroit	124	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of LeDroit in FY2026 or subsequent years.
DC001002130 Lincoln Heights/Richardson	598 33 removed	DCHA received demolition approval for 33 units at the Lincoln Heights site in FY2017. A total of 33 units have been demolished and removed from PIC to date from Lincoln Heights. DCHA received approval to demolish & dispose of the remaining units at Lincoln Heights and Richardson in FY2024. Residents are being relocated onsite at both Lincoln Heights & Richardson Dwellings to portions of properties that are in better condition. This will allow DCHA begin further demolition on both properties in FY2026. Lincoln Heights has been identified as one of the 9 initial properties that will undergo renovation as part of DCHA's bond-revitalization plan, described under MTW Initiative #36.
DC001001290 Lincoln Road*	20	DCHA received a CHAP under its FY2016 RAD Portfolio Award. DCHA plans to convert the property to RAD for stabilization and moderate rehabilitation. DCHA plans to utilize RAD, the Section 18 platform alone, or a combination of Section 18 and the RAD program for RAD/Section 18 blended conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.
DC00100 2220 Marley Ridge	9	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Marley Ridge in FY2026 or subsequent years.
DC00100 5420 Metrotowns (Parkside Pollin)	42	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Metrotowns in FY2026 or subsequent years.
DC001001440 Montana Terrace*	64	DCHA received a CHAP under its FY2016 RAD Portfolio Award. DCHA plans to convert the property to RAD for stabilization. DCHA plans to utilize RAD, the Section 18 platform in combination with the RAD program for RAD/Section 18 blended conversion, or a Section 18 conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.

DC001005430 Nannie Helen	23	This is a New Communities mixed income affordable multi-family building which includes 23 public housing replacement units for Lincoln Heights and Richardson Dwellings residents. DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Nannie Helen in FY2026 or subsequent years.
DC001001290 Ontario Road*	13	DCHA received a CHAP under its FY2016 RAD Portfolio Award. DCHA plans to convert the property to RAD for stabilization and moderate rehabilitation. DCHA will be utilizing the Section 18 platform in combination with the RAD program for RAD/Section 18 blended conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.
DC00100 5240 Oxford Manor	30	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Oxford Manor in FY2026 or subsequent years.
DC001001340 Park Morton	130 78 Removed	DCHA received a phased demo/diso approval for this site in FY2019. Resident relocation occurred for Phase 1. A total of 78 units have been demolished and removed from PIC to date. Additional units will be removed in FY2025 prior to redevelopment in Phase 2. The site is a part of the New Communities Initiative (NCI).
DC00100 5470 Phyllis Wheatly	76	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Phyllis Wheatly in FY2026 or subsequent years.
DDC001004430 Potomac Gardens (Family and Senior Mid-Rise)	352	DCHA received a RAD CHAP for Potomac Gardens family and senior midrise in FY2021. In FY2024, DCHA submitted a Section 18 disposition application to reposition the operating subsidy for the entire site. DCHA plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 blend conversion for the property in FY2026 or subsequent years
DC00100 1690 Regency House	160	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Regency House in FY2026 or subsequent years.
DC00100 5490 Residences at Hayes Street	50	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Hayes Street in FY2026 or subsequent years.
DC00100 5300 Sheridan Station Phase I	45	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Sheridan Station Phase I in FY2026 or subsequent years.
DC00100 5450 Sheridan Station Phase III	65	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Sheridan Station Phase III in FY2026 or subsequent years.
DC00100 1291 Sibley Plaza Senior	224	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Sibley Plaza Senior in FY2026 or subsequent years. Sibley Plaza has been identified as one of the 9 initial properties that will undergo renovation as part of DCHA's bond-revitalization plan, described under MTW Initiative #36.
DC001001291 Sibley Townhomes	22	DCHA received Section 18 demo/diso approval for this site in FY2021. Relocation is complete. Buildings are in the process of acquiring permits for demolition.
DC001005242 St. Martins	51	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of St. Martins Phase 1 in FY2026 or subsequent years.
DC001001290 Sursum Corda	28	DCHA received Section 18 demo/diso approval for this site FY2021. Relocation is complete. Buildings are in the process of acquiring permits for demolition.
DC00100 4240 Syphax Gardens	174	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Syphax

		Gardens in FY2026 or subsequent years. Syphax Gardens has been identified as one of the 9 initial properties that will undergo renovation as part of DCHA's bond-revitalization plan, described under MTW Initiative #36.
DC001005370 The Avenue	27	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Avenue in FY2026 or subsequent years.
DC00100 1340 The Marigold	14	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Marigold in FY2026 subsequent years.
DC001003361 The Villager*	20	DCHA received a CHAP under its FY2016 RAD Portfolio Award. DCHA plans to convert the property to RAD for stabilization and moderate rehabilitation. DCHA plans to utilize the Section 18 platform, RAD, or a RAD/Section 18 blended conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.
DC00100 2230 Triangle View	76	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Triangle View Phase 1 in FY2026 or subsequent years.
DC00100 5410 Victory Square	36	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Victory Square Phase 1 in FY2026 or subsequent years.
DC001003104/ DC001003105 Wheeler Creek	148	A DCHA Hope VI site, Wheeler Creek Apartments ("Wheeler Creek") is a mixed income affordable multi-family property which includes 148 public housing units in 21 separate buildings. DCHA received a RAD CHAP in FY2022. DCHA plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of the property in FY2026 or subsequent years.
DC00100 3361 Woodland Terrace	234	DCHA will consider plans to pursue either a RAD conversion, Section 18 disposition, or a RAD/Section 18 Blend for conversion of Woodland Terrace in FY2026 or subsequent years.
Total Number of Units to be Removed	7,468*	

*Capper Senior I and Henson Ridge I were previously included in this table in the FY25 MTW Plan but have since converted to RAD. The total number of units to be removed also does not include the units already removed from Park Morton, Kenilworth, or Lincoln Heights/Richardson.

3. Planned New Project-Based Vouchers

Over the coming years, DCHA anticipates converting up to 7,937 public housing units to project-based vouchers (PBV) under the Rental Assistance Demonstration (RAD) program, RAD/Section 18 Blend, or Section 18 Demolition/Disposition programs. The actual number of new project-based vouchers may vary depending on several factors including changes to financing plans and construction schedules, receipt of Low-Income Housing Tax Credits, HUD and District of Columbia processing timetables and other factors. The planned new project-based vouchers are related to DCHA's revitalization program, ongoing portfolio assessment and repositioning efforts including conversion of public housing units to project-based assistance under the RAD program, Section 18, or RAD/Section 18 blend methods.

While the table below provides an estimate of the number of new project-based vouchers, the actual number may vary depending on timetables for HUD and District of Columbia local government approvals, project financing, RAD closings and other factors. Due to variances in development schedules and changes in development priorities, units listed below may also include units listed in prior year Annual Plans for which demolition and/or disposition has not yet occurred. The conversion from public housing subsidy to project-based vouchers across the public housing portfolio will take many years. Prior to and consistent with the selected repositioning strategy, DCHA will meet with and engage residents

and the community at the affected property as required by HUD and guided by DCHA Board approved development “Principles for Public Housing Subsidy Repositioning” in Resolution 24-16 and “Principles to Govern Redevelopment and Substantial Rehabilitation of DCHA’s Properties” in Resolution 24-15.

Property Name	# Of Vouchers to Be Project-Based	RAD (Yes or No)	Description of Project
Ontario Road	13	Yes	DCHA received a CHAP under its FY2016 RAD Portfolio Award. DCHA plans to convert the property to RAD for stabilization and moderate rehabilitation. DCHA will be utilizing the Section 18 platform in combination with RAD program for RAD/Section 18 blended conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.
Elvans Road	20	Yes	DCHA received a CHAP under its FY2016 RAD Portfolio Award. DCHA plans to convert the property to RAD for stabilization and moderate rehabilitation. DCHA will be utilizing the Section 18 platform in combination with RAD program for RAD/Section 18 blended conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.
The Villager	20	Yes	DCHA received a CHAP under its FY2016 RAD Portfolio Award. DCHA plans to convert the property to RAD for stabilization and moderate rehabilitation. DCHA will be utilizing the Section 18 platform in combination with RAD program for RAD/Section 18 blended conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.
Montana Terrace	64	Yes	DCHA received a CHAP under its FY2016 RAD Portfolio Award. DCHA plans to convert the property to RAD for stabilization and moderate rehabilitation. DCHA will be utilizing the Section 18 platform in combination with RAD program for RAD/Section 18 blended conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.
Lincoln Road	19	Yes	DCHA received a CHAP under its FY2016 RAD Portfolio Award. DCHA plans to convert the property to RAD for stabilization and moderate rehabilitation. DCHA will be utilizing the Section 18 platform in combination with RAD program for RAD/Section 18 blended conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.
Greenleaf Senior	215	Yes	DCHA received a RAD CHAP for Greenleaf Senior in FY2024. Alternatively, DCHA will be submitting a Section 18 disposition application for an operating subsidy repositioning of Greenleaf Senior.
Judiciary House	263	Yes	DCHA received a RAD CHAP for Judiciary House in FY2021, with anticipated closing in FY2025. DCHA will be utilizing the Section 18 platform in combination with RAD program for RAD/Section 18 blended conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.
Potomac Gardens (Family & Senior Mid-Rise)	208	Yes	DCHA received a RAD CHAP for Potomac Gardens family and senior midrise in FY2021, with anticipated closing in FY2025. DCHA will be utilizing the Section 18 platform in combination with RAD program for RAD/Section 18 blended conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.

Wheeler Creek	148	Yes	A DCHA Hope VI site, Wheeler Creek Apartments ("Wheeler Creek") is a mixed income affordable multifamily property which includes 148 public housing units in 21 separate buildings. DCHA received a RAD CHAP in FY2022.
Total	970		

4. Existing Project-Based Vouchers

In addition to planned new project-based vouchers, DCHA will continue to provide PBV subsidies in FY2026 to the developments listed below. The table provides details on PBV developments that are currently committed and/or under contract, and that DCHA projects will be under contract throughout F 2026. Actual data may vary depending on several factors including contract terminations, unit additions and subtractions.

Property Name	Actual # of Project-Based Vouchers	Planned Status at the End of the Plan Year	RAD (Yes or No)	Description of Project
Meridian	34	Leased	No	Family
Edgewood Senior	38	Leased	No	Senior
2008 3rd Street	11	Leased	No	Family
Chapin House	15	Leased	No	Family
Euclid	17	Leased	No	Family
Weinberg House	6	Leased	No	Family
First Street	12	Leased	No	Family
Beacon House—Good Hope Road	15	Leased	No	Family
Kenyon	12	Leased	No	Family
Champlain	28	Leased	No	Family
Shalom House	89	Leased	No	SRO
Green Door	4	Leased	No	Family
Capital Gateway Senior	151	Leased	No	Senior
Robert Walls Senior	47	Leased	No	Senior
Henson Ridge II	92	Leased	No	Family
Oxford Manor	3	Leased	No	Family
Carver Terrace	103	Leased	No	Senior
Accessibuild 22 – DCHA	22	Leased	No	Family
Beacon House	13	Leased	No	Family
JW King	74	Leased	No	Senior
St. Paul – Wayne Place Senior	49	Leased	No	Senior
Birchmere Homes, LLC	2	Leased	No	Family
Fairlawn	10	Leased	No	Family
The Overlook	201	Leased	No	Senior/Family
Affordable Housing Corporation of the District of Columbia	1	Leased	No	Family
Crawford – Bethune House	20	Leased	No	Family

Edgewood – Wheeler Terrace	4	Leased	No	Senior
Williston	28	Leased	No	Family
Edgewood – Gregory	50	Leased	No	Family
Kenilworth	132	Leased	No	Family
Beacon House	10	Leased	No	Family
Community Connections – North Carolina	12	Leased	No	Family
SOME – Independence Place	21	Leased	No	Family
St. Martin	10	Leased	No	Family
Fendall Height – SOME	29	Leased	No	VASH
SOME – Griffin House	1	Leased	No	Family
VIDA Senior	9	Leased	No	Senior
Gibson Plaza	20	Leased	No	Family
WC Smith – 1320 Mississippi Ave	19	Leased	No	Family
St. Dennis – 1636 Kenyon St	8	Leased	No	Family
NCC – VASH	60	Leased	No	VASH
Mi Casa – Intergenerational	20	Leased	No	Intergenerational
Columbia Road/Colorado Road	44	Leased	Yes	Family
Matthews Memorial	35	Leased	Yes	Family
Fairlawn Marshall	30	Leased	Yes	Family
Conway Center	20	Leased	No	SRO
St. Stephens	18	Leased	No	Family
Parkway Overlook	105	Leased	No	Family
Friendship Terrace	125	Leased	No	Senior
Green Valley	25	Leased	No	Family
Capper Senior I	151	Leased	Yes	Senior
Henson Ridge I	68	Leased	Yes	Family
Barry Farms -Phase 1 (The Asberry)	44	Leased	Yes	Family/Senior
Kenilworth 166 -- Phase 1	101	Leased	Yes	Family/Senior
Park Morton	40	Leased	Yes	Family
TOTAL EXISTING PBVs	2,308			

5. FY26 Planned Other Changes to Housing Stock

As part of ongoing efforts to address the redevelopment and modernization needs of the agency's public housing portfolio, DCHA will continue to review and study various funding alternatives and redevelopment opportunities. Listed below are anticipated changes in FY2026 to the Agency's public housing stock and related properties.

Designated Housing Plan:

In FY2026 DCHA may submit a Designated Housing Plan (DHP) and/or enact an elderly preference for the below 20 properties. The agency may request a mixed population designation for certain properties to allow for elderly and non-elderly disabled families to reside in specific units and may

also request an elderly-only designation for certain properties. This DHP mirrors the current population in these developments.

Below is the list of properties that DCHA plans to submit a Designated Housing Plan or at which DCHA plans to institute an elderly-only preference:

Property Name	# Of Units	Designated by Bedroom Size		
		0BDR	1BDR	2BDR
Carroll Apartments	60	0	60	0
Claridge Towers	343	285	58	0
Edgewood Terrace Seniors Development	89	0	89	0
Fort Lincoln	120	96	24	0
Garfield Senior	227	0	226	1
Greenleaf Senior	215	0	58	157
Harvard Towers	191	175	16	0
Horizon House	107	80	27	0
Horizon House - UFAS	19	1	5	13
James Apartments	141	88	53	0
Judiciary House	260	137	121	2
Knox Hill	122	0	122	0
Kenilworth Courts (Phase 1)	42	0	39	3
Potomac Gardens	144	0	144	0
Sibley Plaza	176	0	113	63
Regency House	158	121	36	1
Triangle View	76	0	76	0
Wheeler Creek Senior	100	0	100	0
Victory Square Senior Apartments	97	78	19	0
Total	2,687	1,061	1,359	240

Section 18 Demolition/Dispo:

As part of DCHA's comprehensive portfolio investment plan, DCHA may apply for Section 18 demolition/disposition or RAD/Section 18 blend approval at the following sites:

Anticipated Demolition/Disposition Application Submission During the Plan Year		
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
DC001002220 Benning Terrace	274	DCHA has submitted a disposition application in FY2024 for the site as the units are considered distressed and obsolete housing. Potential future uses include RAD, project-based vouchers, LIHTC and traditional public housing.
DC001001370 Garfield Family	51	DCHA submitted a section 18 demolition application in FY2024 for the 51 units in the Garfield Family Walk-Up Buildings.
DC001001370 & DC001001371 Garfield Senior & Family	280	DCHA looks to submit a demolition and/or disposition application for the site as the units are considered distressed and obsolete housing. Potential future uses include RAD, project-based vouchers, LIHTC and traditional public housing.
DC001004210 & DC001003363 Greenleaf Senior, Gardens, Addition, and Extension	282	DCHA submitted a RAD/Section 18 Blend for Greenleaf Senior (211 units) in FY2024. A disposition application for the remainder of the site, as the units are considered distressed and obsolete housing, was submitted in later FY2024. Potential future demolition applications and other uses may include RAD, project-based vouchers, LIHTC and traditional public housing.
DC001001080 Kelly Miller	160	DCHA looks to submit a demolition and/or disposition application for the site as the units are considered distressed and obsolete housing. Potential future uses include RAD, project-based vouchers, LIHTC and traditional public housing.

DC001003300 Hopkins	158	DCHA submitted a disposition application for the site in FY2024 as the units are considered distressed and obsolete housing. Potential future uses include RAD, project-based vouchers, LIHTC and traditional public housing.
DC00100162 Horizon	107	DCHA submitted a disposition application for the site in FY2024 as the units are considered distressed and obsolete housing. Potential future uses include RAD, project-based vouchers, LIHTC and traditional public housing.
DC001001391 Ledroit	124	DCHA looks to submit a demolition and/or disposition application for the site as the units are considered distressed and obsolete housing. Potential future uses include RAD, project-based vouchers, LIHTC and traditional public housing.
DC00100225 Langston	247	DCHA submitted a disposition application for the site in FY24 as the units are considered distressed and obsolete housing. Potential future uses include RAD, project-based vouchers, LIHTC and traditional public housing.
DC001005190 Kenilworth Courts	89 (phase 1) 201 (phase 2)	Kenilworth Courts will be redeveloped into mixed-income housing with 290 units currently on the site. DCHA has received demolition approval from HUD for the 89 units that are in the first phase of the project, but has not yet received the disposition approval necessary to proceed. In FY2022, DCHA will be resubmitting a disposition application for the 89 units in phase 1 and anticipates submitting a demolition/disposition application for the remaining 201 units.
DC001002130 Lincoln Heights /Richardson Terrace	407	These are units that are a part of an ongoing partnership with the District of Columbia to redevelop the site under the city's New Communities Initiative. The 407 units are the balance of the 440 units at Lincoln Heights minus 33 units for which HUD approved a demo/dispo application and have since been demolished. HUD approved a demolition and disposition application for the remainder of this property in FY24.
	190	These are units at Richardson Dwellings that are a part of an ongoing partnership with the District of Columbia to redevelop the site under the city's New Communities Initiative. HUD approved a demolition and disposition application for the remainder of this property in FY24.
DC001002230 Stoddert Terrace/Fort Dupont Dwellings and Additions	281	DCHA looks to submit a demolition and/or disposition application for the site as the units are considered distressed and obsolete housing. Potential future uses include RAD, project-based vouchers, LIHTC and traditional public housing.
DC001003361 Woodland Terrace	234	DCHA looks to submit a demolition and/or disposition application for the site as the units are considered distressed and obsolete housing. Potential future uses include RAD, project-based vouchers, LIHTC and traditional public housing.
DC001001291 Sibley Plaza	0	Sibley Townhomes was approved by HUD in 2019 for Demolition and Disposition and is expected to be redeveloped. DCHA would like to utilize the upper lot of the Sibley Parking Lot in addition to the portion of the lower lot which is adjacent to Sibley Townhomes as part of the redevelopment plan. The parking lot serves the residents and staff of Sibley Plaza and has approximately 50 spaces. There is also a lower lot that has approximately 35 spaces that are used by the DCHA staff at 1133 N. Capital St. NE.
DC001100 Western Mews	0	DCHA plans to submit a disposition application for Western Mews to transfer the recreational site, which contains 0 units of public housing, to the city.
Total Number of Units to be Removed	2,573	

Choice Neighborhoods Initiative (CNI) Grants/Federal Revitalization Grants:

If CNI is funded by HUD in the FY2026 budget, DCHA may submit a CNI implementation grant application to help achieve the agency's redevelopment goals to revitalize public housing. DCHA received a CNI planning grant for Lincoln Heights/Richardson Dwellings in FY2022 and previously received CNI planning grants for Kenilworth Courts and Barry Farm/Wade Apartments.

New Communities Initiative (NCI):

NCI is a local government initiative designed to revitalize severely distressed subsidized housing and redevelop neighborhoods into vibrant mixed-income communities. The following DCHA sites are located within the NCI footprint: Barry Farm/Wade Apartments (444 units), Lincoln Heights (440 units); Park Morton (174 units); Sursum Corda (28 units); Sibley

Townhomes (22); and Richardson Dwellings (191 units). DCHA will evaluate the most cost-effective method to achieve the redevelopment goals for these sites, including operating subsidy repositioning tools under Section 18 or RAD.

Barry Farm—The redevelopment of Barry Farm is part of the city’s New Communities Initiative (NCI). The redevelopment plan includes demolition and disposition of the existing 444 units at Barry Farm/Wade Apartments to be replaced with 380 replacement units and up to 900 units of newly constructed mixed-income housing. DCHA received HUD demolition approval in FY2017. Relocation and demolition of the existing Barry Farm and Wade Apartments structures is complete, with the exception of five (5) structures that have been designated as historic by the District of Columbia’s Historic Preservation Review Board (HPRB). These structures are located in a newly created local Historic District at the southwest corner of the site near the corner of Stevens Road and Firth Sterling. The Planned Unit Development (PUD) approved by the DC Zoning Commission in December 2014 was vacated in June 2018 after the courts cited concerns with the plan during the zoning appeal. These units had been previously approved for demolition with the FY2017 approval. DCHA will amend the demolition approval and dispose these units as administratively feasible. Eventually, DCHA may redevelop these units into community space for non-residential purposes.

The development is required to provide 380 low-income replacement public housing units in addition to other affordable and market-rate units for a total of up to 1,100 units, including rental homeownership and approximately 40,000 square feet of neighborhood-serving retail space. The first building on the site, the Asberry, a 108 unit building with a preference for elderly families with a head of household, co-head or spouse aged 55 years and older was completed in FY2024. There will be 77 replacement units at the Asberry for former Barry residents. 44 of the replacement units at the Asberry are Restore Rebuild (formerly Faircloth-to-RAD) units and the remaining 33 are subsidized through the Local Rent-Program Supplement Program (LRSP). The next building will be a 139-unit multifamily building called "The Edmonson." The building has 50 replacement units targeted for former Barry Farm residents. DCHA had a financial closing for this building in May 2024 and began construction in Q3 FY2024 and will be delivered in FY2026. The next financial closing for Barry Farm is planned for FY2025 and will include 90 units total – comprising of stack flats and townhomes, with 42 replacement units to be created through the Restore-Rebuild program. There are also plans to use Restore-Rebuild and other repositioned subsidy to subsidize additional future phases.

Lincoln Heights and Richardson Dwellings— DCHA received approval in FY2017 for the demolition of three vacant structures at the southeast corner of 50th Place NE and Fitch Place NE consisting of a total of 33 long- term distressed and vacant units at Lincoln Heights. Thirty-three units were demolished in the summer of 2019. The agency received a CNI planning grant in FY2022 that will allow DCHA to reassess and revise redevelopment plans for both the Lincoln Heights and Richardson Dwellings sites. Currently, residents are being relocated to portions of each property that have light unit renovations as part of a stabilization plan to allow for selective demolition and future onsite build-first opportunities. DCHA is seeking alternative financing for this New Communities property since District funding for this site is no longer considered viable. Lincoln Heights has been identified as one of the 9 properties that will be renovated under the bond revitalization plan as described in MTW Initiative #36. DCHA is also considering redevelopment plans for the renovation of Richardson Dwellings and demolition of the units at Richardson Dwellings which will open the site for greater density.

Park Morton—The redevelopment of Park Morton is envisioned to include demolition and disposition of all 174 public housing units. The redevelopment will be implemented in phases with a total of 468 new

units in the project (both on and offsite). DCHA moved forward with the on-site portion of the project (known as Phase 2) prior to offsite build-first development due to opposition of the zoning approvals by a small group. A phased demolition/disposition application was approved in FY2019. Residents in the Phase 1 area have been relocated, and buildings have been demolished. New construction of a 142-unit multifamily building began in FY2023 and is expected for delivery by summer FY2025, including 40 replacement units will be targeted to former Park Morton residents. Phase 2 redevelopment is currently in the planning phase with targets for financial closing of the remaining 17 replacement units on the Park Morton site in FY2025. Planning for 90 off-site replacement units at Bruce Monroe property is ongoing as well. DCHA may seek Faircloth to RAD to subsidize the 90 replacement units at Bruce Monroe.

6. General Description of All Planned Capital Fund Expenditures During the Plan Year

For FY2026, DCHA's Capital Fund investments — projected at approximately **\$63 million** — will focus on improving safety, modernizing critical infrastructure, and enhancing the quality of life for our residents.

Our key areas of investment include:

1. Comprehensive Property Rehabilitation

Major unit and building upgrades are planned at several large sites, including LeDroit Senior, Lincoln Road, Montana Terrace, Greenleaf, and Kelly Miller. These efforts include full-unit renovations, common area improvements, and stormwater management.

2. Building Systems Modernization

Capital repairs will address critical systems such as:

- HVAC (heating, ventilation, and cooling)
- Electrical and emergency power systems
- Plumbing and domestic water infrastructure
- Elevators and vertical transportation

3. Building Envelope and Structural Repairs

Investments will support:

- Roofing and window replacements
- Exterior façade repairs
- Interior finishes, including flooring and accessibility upgrades

4. Safety and Security Enhancements

This includes:

- Fire alarm system installations
- Security infrastructure upgrades (CCTV, access control, entry doors, and guard stations)

5. Healthy Homes and Code Compliance

Through the **Child Healthy Homes Initiative**, we'll support unit turnover, mold abatement, and appliance replacement to ensure compliance with health and safety standards.

6. Vacant Unit Turnovers

DCHA will continue to utilize Capital Funds to support vacant unit turns at various properties in the public housing portfolio.

DCHA may modify its planned capital expenditures during the Plan year based on changing priorities, emergency conditions and other factors.

B. Leasing Information

1. Planned Number of Households Served at the End of the Fiscal Year

The following is a snapshot and the unit month information on the number of households DCHA plans to serve at the end of the Plan Year. The table provides information on households living in “MTW units” that DCHA plans to serve during FY2026. This includes all households residing in public housing units as well as federal HCV MTW households. The actual number of households served may vary from that listed on the tables. The conversion of public housing to project-based assistance under RAD began in FY2017 and will continue in FY2026 and beyond. RAD vouchers are included in the total “Federal MTW Voucher (HCV) Units to be Leased” shown below. The number of public housing and HCV families served may be affected by the RAD conversion schedule, new public housing unit development schedules, redevelopment activities and other factors.

Planned Number of Households Served Through	Planned Number of Unit Months Occupied/Leased*	Planned Number of Households to Be Served**
Public Housing Units Leased	68,400	5,700
Housing Choice Vouchers (HCV) Utilized	177,264	14,772
Local, Non-Traditional: Tenant-Based^	N/A	N/A
Local, Non-Traditional: Property-Based^	768	64
Local, Non-Traditional: Homeownership^	N/A	N/A
TOTAL	246,432	20,536

* “Planned Number of Unit Months Occupied/Leased” is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

** “Planned Number of Households to be Served” is calculated by dividing the “Planned Number of Unit Months Occupied/Leased” by the number of months in the Plan Year.

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

Local, Non- Traditional Category	MTW Activity Name/Number	Planned Number of Unit Months Occupied/Leased*	Planned Number of Households to Be Served*
Tenant-Based	N/A	N/A	N/A
Property-Based	Initiative #36: Affordable Housing and Preservation Development Fund	768	64
Homeownership	N/A	N/A	N/A

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

2. Description of any Anticipated Issues/Possible Solutions Related to Leasing

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
MTW Public Housing	Over the past 18 months, DCHA has made strides in increasing its public housing occupancy, but the agency continues to face challenges in leasing. To help address these barriers, DCHA is undertaking several strategies: • Implementation of Site-Based Waiting Lists: DCHA plans to launch site-based waiting lists for its public housing properties in late FY2025 or FY2026. Site-based waiting lists will allow applicants to consider and select properties where the location, property, and community amenities, and unit features meet their families' needs. DCHA anticipates this will help address the ongoing issues with applicant refusals of units. • Vacancy Turn Overs and Unit Modernization: DCHA's public housing operations team has increased its capacity to turn routine vacant units and the Office of Capital Programs continues to work diligently to bring units that are offline for modernization back online. • Ensuring Data Accuracy and Quality: DCHA identified several areas of inconsistency between its internal systems and HUD PIC. In response, DCHA has not only undertaken efforts to resolve these inconsistencies but has also transitioned from conducting annual reconciliations with HUD's PIC system to performing them on a quarterly basis. This change is intended to enhance the accuracy of forecasting, ensure that data remains current, and enable the agency to more promptly identify and address any future discrepancies. DCHA also continues to monitor its progress, in consultation with HUD, towards achieving the goals stated in the STS Corrective Action Plan. The CAP is regularly amended and updated in consultation with HUD. The November 2024 CAP, as approved by HUD, set goals of leasing up approximately new 20 public housing households each month (net of transfers and move-outs) in FY2025 and FY2026 to bring the agency into full STS compliance.
MTW Housing Choice Voucher	DCHA's biggest challenge in leasing new voucher units is the age of its waitlist. Since 2023, DCHA has pulled over 19,000 applicants from its existing HCV waiting list. Of these applicants, less than half responded to the notice that they have been pulled from the waiting list, and only 6% have leased up. Despite this, DCHA has made notable progress with leasing for the Housing Choice Voucher program in the past year, increasing utilization from 86% at the beginning of FY2025 to 93% at the time of plan submission. DCHA has adopted several strategies to improve voucher success rates, increase landlord participation, and provide high quality customer service to tenants and landlords including bimonthly Meet and Lease events, hiring Landlord Liaisons, and bringing on Housing Locators to assist voucher holders with the housing search process. DCHA has also implemented a new customer service intake process at its Resident Service Center designed to streamline assistance and improve response times. DCHA's HCVP Department continues to work on increasing its landlord base. In FY2025, DCHA introduced a new initiative, the "Voucher Success Fund" that will include security deposit assistance and, also in FY2025 and into FY2026, will expand the Fund to include application fee assistance for applicants and a damage mitigation to maintain and recruit landlords into the HCV program. This initiative is commencing with non-federal funds but is being included as an MTW initiative to enable DCHA to continue its operation using MTW funds and flexibilities.

	In order to maximize HCV participant choice and increase affordable housing availability, especially in high-cost opportunity neighborhoods, DCHA has utilized its MTW authority to increase its payment standard up to 187% of the HUD Fair Market Rent (FMR). This policy change will continue in FY2026. DCHA continues to monitor its progress, in consultation with HUD, towards achieving the goals stated in the STS Corrective Action Plan. The CAP is regularly amended and updated in consultation with HUD. The November 2024 CAP, as approved by HUD, set goals of leasing up approximately 75 new voucher households each month (net of transfers and move-outs) in FY2025 and FY2026 to bring the agency into full STS compliance.
Local, Non-Traditional	No anticipated issues.

C. Wait List Information

1. Wait List Information Projected for the Beginning of the Plan Year

Waiting List Name	Description	Number Of Households on Waiting List	Waiting List Open, Partially Open, or Closed	Plans To Open the Waiting List During The Plan Year
Public Housing	Site-based	2,296	Varies by Site – DCHA plans to open site-based waiting lists in FY25/FY26	Will vary by site
Housing Choice Voucher	Community-wide	18,083	Closed	No
Housing Choice Voucher (Mod-Rehab)	Community-wide	21,220	Closed	No

Please describe any duplication of applicants across waiting lists:

Applicants can select to be listed on multiple waiting lists, both DCHA managed and those managed by other entities. As such, there are applicant households who appear on more than one of the above lists.

2. Planned Changes to Waiting List in the Plan Year

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

Waiting List Name	Description of Planned Changes to the Waiting List
Public Housing	DCHA is moving toward site-based waitlists for all public housing properties to provide applicants a choice regarding which part of the city they wish to live. After exhausting the community-wide waitlist in FY2025, DCHA plans to open site-based waiting lists in late FY2025 or FY2026. DCHA will reopen the waiting list and the

	system by which applicants will be placed on the waiting list in accordance with the Public Housing Admissions and Continued Occupancy Plan (ACOP) and/applicable site-based tenant selection plans.
Housing Choice Voucher	DCHA continues to administer the HCV waiting list which has been closed since approximately 2013. Once the current HCV waiting list has been exhausted, DCHA will reopen the waiting list to accept applications for both tenant-based and site-based waiting list. DCHA will announce the reopening of the waiting list and the system by which applicants will be placed on the waiting list at least 10 business days prior to the date applications will first be accepted in accordance with its HCV Administrative Plan.
Housing Choice Voucher (Mod-Rehab)	This waitlist is managed in accordance with the policies outlined for the MTW Housing Choice Voucher waitlist.

Section III. Proposed MTW Activities

This section describes the three new MTW initiatives and two re-proposed activities that DCHA proposes to implement in FY2026.

Initiative 35: Voucher Success Fund (proposed)

ACTIVITY DESCRIPTION

DCHA established a Voucher Success Fund using approximately \$7 million in non-federal funds in March 2025. This fund supports activities designed to enhance voucher holder success and increase housing choice, including mobility counseling, application fee and security deposit assistance, and landlord engagement incentives.

The following incentives and supports are currently available through the Fund:

Security Deposit Assistance:

- DCHA will pay a one-time security deposit to the landlord on the tenant's behalf, up to a maximum of one month's rent. The Security Deposit Request form will be included in the materials given to applicants and participants who are moving to new units and is included in the landlord/owner portal.

Housing Navigation Support:

- DCHA has hired Housing Navigators and Landlord Liaisons who are available to help participants search for housing, communicate with landlords, provide information on the rent reasonableness of units, and assist participants with navigating the steps in the leasing process.

DCHA is also currently developing and plans on implementing the following incentives by the end of 2025:

- Application Fee Assistance
- Damage Mitigation Fund

As the initial non-federal funds are expected to be fully expended before the end of FY26, DCHA proposes using its MTW authority to continue selected activities under a new MTW initiative. This activity would support DCHA's goal in the 3-Year Recovery Plan of using MTW flexibility to improve voucher utilization and provide Housing Choice Voucher program participants with a diverse range of tenant-based and project-based housing and related service options.

While the current fund is still active, DCHA will perform ongoing analysis to determine the utilization and success of each incentive and assess the feasibility of continuing these incentives through its MTW flexibility and funding. DCHA may adjust or explore additional incentives in future years that require MTW authorization in response to market fluctuations, landlord and resident feedback, funding considerations, and local priorities.

COST IMPLICATIONS

As the current fund continues to be active, DCHA will evaluate utilization trends and assess the effectiveness and feasibility of continuing these incentives through the MTW Block Grant. DCHA will provide more information in the FY2025 MTW Report as is available.

TIMELINE FOR IMPLEMENTATION

Upon approval from HUD, DCHA plans to implement this activity in FY26. Although we anticipate that the initial funds will be depleted by the end of FY26, depending on the availability of remaining funding, DCHA may not need to begin using MTW funds until after FY26.

STATUTORY OBJECTIVES

The proposed activity will support the statutory objective of increasing housing choices for low-income families.

MTW AUTHORIZATIONS

The proposed activities are authorized in DHCA's MTW Agreement under:

- Attachment C, Section B(1)(b)(iii) and (viii) containing waivers of certain provisions of Sections 8 and 9 of the 1937 Act and 24 C.F.R. 982 and 990. The Agency is authorized to use housing assistance payments for purposes other than payments to owners under single fund flexibility, so long as these purposes are consistent with other eligible uses of section 8 and section 9 funds.
- Section D(1)(d) containing waivers of certain provisions of Section 8(o)(9) of the 1937 Act and 24 C.F.R. 982.311. The Agency is authorized to determine damage claim and/or vacancy loss and policy and payment policy for occupied units that differs from the policy requirements current mandated in the 1937 Act and its implementing regulations.

Initiative 36: Affordable Housing and Preservation Development Fund (proposed)

ACTIVITY DESCRIPTION

DCHA proposes the establishment of an Affordable Housing and Preservation Development Fund using MTW funding flexibility to support the preservation, development, and expansion of affordable housing across the District. This fund will serve as a strategic resource to advance DCHA's short- and long-term objectives for strengthening and sustaining its affordable housing portfolio.

This activity will directly support DCHA's plan to complete a portfolio-wide asset modernization and repositioning, including a set-aside of up to \$70 million in MTW block grant funds to support the revitalization of 19 of DCHA's public housing properties using Industrial Revenue Bonds (IRBs).

As part of this bond revitalization plan, DCHA has identified nine initial properties that will begin redevelopment under Phase 1 in FY26:

Claridge Towers, James Apartments	Ward 2
Fort Lincoln	Ward 5

Hopkins Apartments, James Creek, Sibley Plaza, Syphax Gardens	Ward 6
Lincoln Heights	Ward 7
Knox Hill	Ward 8

Subsequent phases of the bond revitalization plan will include ten other public housing communities:

Harvard Towers, LeDroit Senior	Ward 1
Horizon House, Judiciary House	Ward 2
Regency House	Ward 3
Carroll Apartments, Kentucky Courts	Ward 6
Stoddert Terrace	Ward 7
Highland Addition, Woodland Terrace	Ward 8

The activity may also be used to support future activities including, but not limited to:

- Preservation of existing affordable and public housing units;
- Development of new affordable housing;
- Acquisition of land, properties, or owner interests for affordable housing purposes;
- Local, non-traditional development activities.

TIMELINE FOR IMPLEMENTATION

DCHA plans to begin implementing this activity in FY26 upon HUD approval of the FY26 MTW Plan.

COST IMPLICATIONS

DCHA plans to use MTW funding flexibility and block grant reserves to support this initiative. DCHA will report costs attributable to this activity in the annual MTW Plan and Reports.

STATUTORY OBJECTIVES

The proposed activity will support the statutory objective of increasing housing choices for low-income families.

MTW AUTHORIZATIONS

The proposed activities are authorized in DHCA's MTW Agreement under:

- Attachment C(C)(13) waiving certain provisions of 24 C.F.R. 941.401. The agency is authorized to acquire sites without prior HUD approval, provided that the agency certifies that HUD site selection requirements have been met.
- The Broader Uses of Funds Authority amendment enables DCHA to develop methods of financing to assist in preserving existing affordable housing.
- Under Attachment D(I), DCHA may use MTW funding for local, non-traditional uses providing that the activities meet the requirement of the MTW statute and comply with requirements set forth in PIH Notice 2011-45 for Local Non-Traditional development programs.

Initiative 37: Extension of RAD Resident Rights to Section 18 Program (proposed)

ACTIVITY DESCRIPTION

In May 2024, the DCHA Board of Commissioners adopted Resolution 24-15, “Principles to Govern Redevelopment and Substantial Rehabilitation of DCHA’s Properties”. Under this resolution DCHA sought to create a fair and transparent process enabling the Board of Commissioners, DCHA residents and participants, and other stakeholders to better understand DCHA’s approach to redevelopment endeavors. These guiding principles are intended to ensure that DCHA and DCHA residents benefit from redevelopment activities, with residents involved in decision-making at every step, as well as to support the long-term viability of public housing developments.

As part of its portfolio-wide plan to rehabilitate, reposition, and/or redevelop its public housing properties, DCHA will utilize a variety of redevelopment tools, including RAD and Section 18. Each of these tools have distinct statutory and regulatory requirements, resulting in varying resident protections. Pursuant to Resolution 24-15, DCHA seeks to ensure that residents have the same tenant protection rights irrespective of whether RAD, RAD blends, or Section 18 is used to reposition a property. Accordingly, DCHA proposes to use its MTW authority to extend the resident protections and rights provided to DCHA households under the Rental Assistance Demonstration (RAD) program during the redevelopment process, to DCHA households impacted by public housing conversions or dispositions under the Section 18 program. Through this MTW activity, DCHA will provide consistent and aligned resident protections across all redevelopment projects that use RAD or Section 18.

The RAD rights to be extended in each redevelopment using RAD, a RAD blend, or Section 18 repositioning are those identified in Notice PIH 2019-23 (HA), Rental Assistance Demonstration REV-4:

- No rescreening of current residents (those residing at the public housing site) upon conversion from public housing to project-based vouchers
- Resident right to return
- Phase-in of Resident Rent Increases
- Current FSS participants may continue to participate in FSS
- Residents may continue to establish and operate a resident organization and be eligible for resident participation funding
- RAD Resident procedural rights will apply, including termination notifications and grievance rights
- RAD requirements will apply for current residents when total tenant payment exceeds gross rent

COST IMPLICATIONS

DCHA does not anticipate any costs associated with this activity.

STATUTORY OBJECTIVES

The proposed activity will support the statutory objectives of increasing housing choices for low-income families, and reducing costs and achieving greater cost effectiveness in federal expenditures.

MTW AUTHORIZATIONS

The proposed activities are authorized in DCHA’s MTW Agreement under:

1. No Rescreening of Tenant upon Conversion

- Attachment C (D)(3)(a) waiving certain provisions of Section 16(b) and 8(o)(4) of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.628, and 982.201. Agency is authorized to determine income qualifications for participating in the rental assistance program that different from the currently mandated program requirements in the 1937 Act and its implementing regulations.

2. Right to Return

- No MTW waiver needed to implement this.

3. Renewal of Lease

- Attachment C (D)(1)(a) waiving certain provisions of Sections 8(o)(7)(a), 8(o)(13)(F), and 8(o)(13)(G) of the 1937 Act and 24 C.F.R. 982.303, 982.309, and 983 Subpart F. The Agency is authorized to determine the term and content of the Housing Assistance Payment (HAP) contracts to owners during the term of the MTW demonstration.

4. Phase-in of Tenant Rent Increases

- Attachment C (D)(3)(a) – waiving certain provisions of Sections 16(b) and 8(o)(4) of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.628, and 982.201. The agency is authorized to determine income qualifications for participation in the rental assistance program that differ from current mandated program requirements in the 1937 Act and its implementing regulations.

5. PH FSS and ROSS Programs – PH residents that are currently FSS participants will continue to be eligible for FSS once their housing is converted

- No MTW waiver needed to implement this.

6. Resident Participation and Funding

- No MTW waiver needed to implement this.

7. Resident Procedural Rights, termination notification & grievance process

- No MTW waiver needed to implement this.

8. When Total Tenant Payment Exceeds Gross Rent

- Attachment C (D)(3)(a) waiving certain provisions of Sections 16(b) and 8(o)(4) of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.628, and 982.201. The Agency is authorized to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations.

9. Under-Occupied Unit

- Attachment C (D)(7) the Agency is authorized to develop and adopt a reasonable policy and process for project-basing Section 8 tenant-based leased housing assistance.

Initiative 1: Modifications to DCHA's Project-Based Voucher Program (re-proposed)

ACTIVITY DESCRIPTION

DCHA originally proposed and received approval from HUD for Initiative 1 (formerly 1.1.04) as part of the agency's FY2004 MTW Plan. Modifications were also made in FY2005 and FY2006. In order to increase housing choices for low-income families, DCHA modified existing project-based voucher (PBV) rules and regulations to:

- Allow a longer HAP contract term—from 10 to 15 years.
- Increase the threshold of units that can be project-based at a single building from 25% to 100%.
- Increase the percentage of DCHA's total voucher allocation that can be project-based to greater than 20%, thereby eliminating the cap on the percentage of DCHA's voucher allocation that can be project-based.
- Allow the owners of PBV units to establish site-based waiting lists.
- Allow applicants on the Public Housing waiting list who are determined to be eligible for accessible units meeting Uniform Federal Accessibility Standards (UFAS) to be eligible for UFAS PBV units.
- Create a UFAS Loan Program to assist landlords in converting existing units to UFAS units or create new UFAS units that are subsidized through the Partnership Program and thus creating more housing choices for the disabled and their families.
- Allow Public Housing residents with a right of return to a HOPE VI development to have preference in returning to PBV units.

In the FY2026 MTW Plan, DCHA is re-proposing this activity in order to make additional modifications to its Project-Based Voucher Program. DCHA is proposing the following additional modifications to its Project-Based Voucher Program and will implement these changes upon approval of the FY2026 MTW Plan:

- **Allocation of Project-Based Vouchers without a competitive process at properties owned directly or indirectly by DCHA.**
 - When allocating new project-based voucher to properties owned directly or indirectly by DCHA, DCHA will waive the requirement under PBV regulations to engage in a competitive process. This activity will help streamline DCHA's affordable housing development and preservation efforts by reducing administrative delays and costs associated with issuing an RFP through the competitive process. All PBV allocations and HAP contracts must still conform to HUD program rules and are reported in the MTW Annual Plan. Additionally, all PBV units, whether selected competitively or not, must meet rent reasonableness standards and pass Housing Quality Standards (HQS) inspections. All PBV allocations will also be subjected to Board approvals and other HUD assessments, such as subsidy layering reviews, if applicable.
- **Waiver of 3rd party rent reasonableness determinations for PBV projects.**
 - Under this activity, DCHA will waive the requirement to use a 3rd party to determine rent reasonableness for PBV projects at properties owned directly or indirectly by the agency. DCHA will conduct PBV rent reasonableness determinations in-house, as the agency currently does for tenant-based vouchers under HCV program.
- **Waive requirement under HOTMA to conduct impact analyses if project-basing more than 50% of units.**

- DCHA will waive the new requirement under HOTMA to conduct impact analyses if project-basing more than 50% of units to align with the agency's previously approved MTW policy that eliminates the cap on the percentage of DCHA's voucher allocation that can be project-based.
- **Updated HAP Contract Term from 15 to 20 years.**
 - Under new HOTMA regulations¹, all public housing agencies can enter into a HAP contract for an initial term up to 20 years. DCHA has modified its HAP contract term from 15 to 20 years in alignment with the changes under HOTMA. DCHA will keep this activity in its MTW Plan under Initiative 1 and may, in the future, explore using MTW authority to further extend the HAP contract term.
- **Authorization to conduct substantial improvements to units within two years of the effective date of a HAP contract.**
 - This authorization will enable DCHA to execute a HAP contract for units, including those disposed pursuant to Section 18 of the U.S. Housing Act of 1937 ("the Act"), as amended, during or prior to commencement of rehabilitation work at certain properties. All units must meet housing quality standards (HQS) or replacement HUD standards before they are added to a HAP contract. HAP payments will not be made for specific units while they are undergoing rehabilitation work even if the unit is included in the HAP contract.

COST IMPLICATIONS

DCHA anticipates that the proposed activities will streamline processes for the agency's Project-Based Voucher program, and therefore save staff time and effort, as well as administrative costs.

STATUTORY OBJECTIVES

These proposed activities will support the statutory objectives of increasing housing choices for low-income families and reducing costs and achieving greater cost effectiveness in federal expenditures.

MTW AUTHORIZATIONS

The proposed activities are authorized in DCHA's MTW Agreement under:

- Attachment C, Section D(7)(a) containing waivers of Section 8(o)(13)(B and D) of the 1937 Act and 24 C.F.R 982.1, 982.102 and 24 C.F.R. Part 983. Project-based assistance for such owned units does not need to be competitively bid.
- Attachment C, Section D(2)(c) containing waivers of Section 8(o)(10) of the 1937 Act and 24 C.F.R. 982.507. The Agency is authorized to develop a local process to determine rent reasonableness that differs from the currently mandated program requirements in the 1937 Act and its implementing regulations.
- Attachment C, Section D(1)(e) containing waivers of Section 8(o)(13) of the 1937 Act and 24 C.F.R 483. The Agency is authorized to determine the percentage of housing voucher assistance that it is permitted to project-base and criteria requirements currently mandates in the 1937 Act and its implementing regulations.

¹ In May 2024, HUD released the "Housing Opportunity Through Modernization Act of 2016 – Housing Choice Voucher (HCV) and Project-Based Voucher Implementation; Additional Streamlining Changes" rule.

- Attachment C, Section D(1)(f) containing waivers of Section 8(p) of the 1937 Act and 24 CFR 983.53-54. The Agency is authorized to determine property eligibility criteria, including types of units currently prohibited by Section 8 regulations, as well as shared living facilities.
- Attachment C, Section D(7)(a) containing waivers of Sections 8(o)(13)(B and D) of the 1937 Act and 24 C.F.R. Part 983. The agency is authorized to project-based Section 8 assistance at properties owned directly or indirectly by the Agency that are not public housing, subject to HUD's requirements regarding subsidy layering.

Initiative 12: Rent Simplification and Collections (re-proposed)

ACTIVITY DESCRIPTION

DCHA has explored various ways to simplify the rent calculation and collections models. As part of its exploration, DCHA looked at self-certification of assets and excluding local stipends for grandparents. The goal of this initiative was to build on existing rent simplification models to design a model that simplifies the calculation process and lessens the burden of rent calculations for the neediest families. As Phase 1 of this initiative, DCHA implemented the following as part of DCHA's Rent Simplification strategy: self-certification of assets less than \$15,000, including an increase in the threshold for reporting assets.

In the FY2026 MTW Plan, DCHA is re-proposing this activity in response to current or anticipated changes in income, rent, and asset policies under the Housing Opportunities Through Modernization Act (HOTMA). DCHA is proposing the following updates and will implement these changes upon approval of the FY2026 MTW Plan:

- **Self-certification of Assets up to \$50,000 and Exclusion of Assets under \$50,000 from the rent calculation.**
 - DCHA will increase its self-certification of assets policy from \$15,000 to \$50,000 for public housing and voucher families and exclude assets under \$50,000 from the rent calculation. DCHA makes these changes in anticipation of the pending asset requirements under HOTMA.
- **Waive HOTMA requirement to use 12 months of previous income to determine income at reexamination and maintain DCHA's existing reexamination policy.**
 - DCHA will waive the HOTMA requirement to use 12 months of previous income for reexamination purposes. Instead, DCHA will maintain its existing policy of using "current circumstances" as outlined in the ACOP and Admin Plans. In FY26, DCHA will conduct an analysis to evaluate the impact of implementing the 12-month requirement on both tenants and agency operations.
- **Waive HOTMA changes to student financial assistance definition and calculation of exclusions and maintain DCHA's existing policy for exclusion of all student financial assistance from income.**
 - In order to better streamline the rent calculation, DCHA will waive the new requirements under HOTMA and maintain its existing policy for exclusion of student financial assistance as outlined in the ACOP and Admin Plans.

- **Exclude all earned income for full-time, dependent students to better streamline rent calculation process.**
 - In addition to the above HOTMA waivers, DCHA will also streamline the rent calculation process by excluding all earned income received by full-time, dependent students, as defined in the ACOP and Admin Plans. The proposed change would have no impact on the final rent calculation for residents, but it would reduce administrative burden and improve efficiency for DCHA staff.

COST IMPLICATIONS

DCHA anticipates that the proposed activities will simplify processes related to rent calculation and therefore save time and effort for staff, as well as residents, and reduce administrative burden. Additionally, increasing the asset limit will result in a positive benefit for residents by encouraging additional savings and asset building.

STATUTORY OBJECTIVES

Provide incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

RENT REFORM INFORMATION

Not applicable. Although the above proposed activities concern rent calculation, they are specifically in response to changes that would otherwise be required under HOTMA. Additionally, the exclusion of earned income for full-time dependent students' activity is a process change that would have no impact on the amount a household contributes towards their housing costs.

MTW AUTHORIZATIONS

The proposed activities are authorized in DHCA's MTW Agreement under:

- Attachment C, Section(C)(11) containing waivers of Section 3(a)(2), 3(a)(3)(A), and Section 6(l) of the 1937 Act and 24 C.F.R. 5.603, 5.611, 5.628, 5.630, 5.632, 5.634, and 960.255 and 966 Subpart A. The agency is authorized to determine family payment, including the total tenant payment, the minimum rent, utility reimbursements and tenant rent.
- Attached C, Section D(2)(a) containing waivers of Section 8(o)(l), 8(o)(2), 8(o)(3), 8(o)(10), and 8(o)(13)(H)-(l) of the 1937 Act and 24 C.F.R. 982.508, 982.503, and 982.518.

Section IV. Approved MTW Activities/Initiatives

The following outlines DCHA's ongoing MTW Activities (also referred to as "Initiatives"). Note that for simplification, the numbering of the MTW Activities has changed since FY2012. For ease of reference when accessing previous plans and reports, the old numbers are included in the summary listing.

A. Summary of MTW Activities/Initiatives

New Number	Old Number	Activity Name	Statutory Objective	Fiscal Year	
				Approved	Implemented
3	1.4.04	Modifications to HCV Homeownership Program	- Reduce cost and achieve greater cost effectiveness - Increase housing choices for low-income families	FY2004	FY2004
4	2.1.04	Streamlined Recertification Process (Previously named: "Simplified Certification and Multi-Year Income Recertification")	- Reduce cost and achieve greater cost effectiveness - Encourage families to obtain employment and become economically self sufficient	FY2004	FY2004
7	4.1.04	DCHA Subsidiary to Act as Energy Services Company	Reduce cost and achieve greater cost effectiveness	FY2004	FY2004
8	1.6.05 3.8.10	Local Payment Standards Policy (Previously named: "Modifications to Methods for Setting Total Tenant Payments and Determining HCV Market Rents and Promoting Deconcentration")	- Reduce cost and achieve greater cost effectiveness - Increase housing choices for low-income families	FY2005 & FY2010	FY2005 & FY2010
11	1.10.06; 2.5.04; 3.9.12; 22	Site-Based Waiting Lists (Previously named: "Site-based Intake and Waiting List Management of Public Housing, Redeveloped Properties and Service Rich Properties")	- Reduce cost and achieve greater cost effectiveness - Encourage families to obtain employment and become economically self-sufficient - Increase housing choices for low-income families	FY2004 FY2012	FY2005 FY2014
17	2.8.11	Re-Inspection Fee and Abatement Process for HQS Violations (Previously named: "Change in Abatement Process, including Assessment of a Re-inspection Fee as an Incentive to Maintain Acceptable Housing Quality Standards (HQS) in Voucher Assisted Units")	Reduce cost and achieve greater cost effectiveness	FY2011	FY2012

18	3.9.11	Creation of Local Authorization and Release of Information Form with an Extended Expiration to Support the Biennial Recertification Process	Reduce cost and achieve greater cost effectiveness	FY2011	FY2012
20	2.9.12	Enhance Neighborhood Services within Public Housing Communities	Encourage families to obtain employment and become economically self-sufficient	FY2012	FY2012
23	3.10.12	Encourage the Integration of Public Housing Units into Overall HOPE VI Communities	Increase housing choices for low-income families	FY2012	FT2015
25	NA	Local Blended Subsidy	- Reduce cost and achieve greater cost effectiveness - Increase housing choices for low-income families	FY2014	FY2014
32	N/A	Modifications to the HCV Family Self-Sufficiency Program	Increase housing choices for low-income families	FY2019	FY2020
33	N/A	Waiver for Third-Party Housing Quality Standards (HQS) Inspections	Reduce cost and achieve greater cost effectiveness	FY2021	FY2021
34	N/A	Local Elderly Family Definition	Increase housing choices for low-income families.	FY2024	FY2024

B. Approved MTW Initiatives²

Initiative 3: Modifications to HCV Homeownership Program

Description/Update

As part of DCHA's efforts to develop new housing opportunities for low-income families that promote self-sufficiency, the Agency has explored and implemented various modifications to its HVCP Homeownership Program (HOAP), as regulated by HUD, that make it:

- More attractive to financial institutions and DCHA participants/residents,
- More user-friendly to DCHA participants interested in homeownership,
- More cost efficient to administer, and more realistic in promoting long-term homeownership success.

The result was the establishment of the following policies utilizing MTW flexibility:

1. The minimum down payment was set at 3% with no minimum required from the family's personal resources;
2. A recapture mechanism was established that allows for the recapture of a portion of the homeownership (mortgage payments) assistance if the family leaves the property in the first 10 years;

² DCHA notes that the following approved MTW activities also apply to Special Purpose Voucher (SPV) households: MTW Initiative #4 – Streamlined Recertification Process; MTW Initiative #8 – Local Payment Standards Policy; MTW Initiative #17 – Re-Inspection Fee and Abatement Process for HQS Violations; MTW Initiative #32 – Modifications to DCHA Self-Sufficiency Program, and MTW Initiative #33 – Waiver for 3rd Party HQS Inspections.

3. The employment requirement was increased from one year to at least two years;
4. Portability is no longer permitted under the Homeownership program; and
5. A termination clause was included providing for the termination of a household from the program if the household income falls below the minimum amount required for more than 12 months.

Provisions for Converting from Voucher Use for Homeownership to Rental Subsidy (FY2016 Plan Proposed Initiative Amendment)

DCHA is utilizing its MTW authority to clarify provisions of its Homeownership Assistance Program (HOAP) to limit the circumstances under which a family utilizing a voucher for homeownership can stop using it for that purpose and begin using it for rental assistance. Currently, there are no prohibitions. Under the proposed policy, DCHA would only allow elderly and/or disabled families and those families who have lost income that cannot be replaced to go from using a voucher for purposes of homeownership to rental assistance.

Homeownership Assistance Program Participation for \$0 HAP Voucher Households (FY2019 Plan Proposed Initiative Amendment)

Under DCHA's current policy, families are transitioned off the Housing Choice Voucher Program (HCVP) after 180 days of paying 100% of their contract rent. Specifically, these are households for which DCHA is no longer paying any subsidy to the landlord on behalf of the household because the family is paying all the rent for the unit. As part of the agency's focus on maximizing self-sufficiency opportunities for DCHA families, DCHA proposed an expansion of its Homeowner Assistance Program (HOAP) to create a voluntary homeownership option for HCVP households who are paying 100% of their contract rent for at least 180 days. Participating households would have an additional five years to retain their voucher while working towards homeownership instead of being terminated from the voucher program after 180 days.

As HOAP participants, these families enter a Contract of Participation, not to exceed five years, that outlines a plan for achieving homeownership. In addition, participants will be assigned a HOAP Coordinator to provide assistance in preparing for homeownership, along with a suite of resources provided through various partners that have expertise in the key elements of homeownership preparation.

The participating families will stay on the voucher program, although no subsidy will need to be paid by DCHA toward the contract rent. However, in the event a family experiences a decrease in their household income that impacts their ability to pay 100% of the rent, DCHA will make a rent adjustment and pay the needed subsidy to the landlord on behalf of the participant. DCHA anticipates minimal HAP expenses, allowing the agency to issue vouchers to families on the waiting list.

Entrance into the program for these families will be capped at 50 households. There are households who are currently paying full contract rent and are ready for transitioning off the program. Most of these households already meet the Department of Housing and Community Development (DHCD) first-time homebuyer assistance program (Home Purchase Assistance Program or HPAP) income requirements for their household size.

Eligible families must:

- Need the homeownership preparation assistance provided through HOAP in order to purchase a home. At the time a household demonstrates interest in the program, DCHA will work with a program partner(s) to determine a household's ability to obtain a mortgage without participation in HOAP or a voucher.
- Have household income that meets the minimum threshold of the DHCD HPAP program—the homebuyer's down payment assistance program that has made homeownership possible for the vast majority of DCHA households that have purchased homes.
- DCHA would make the HOAP resources available for those households who may have the income to pursue homeownership and are interested in it as a housing option but need assistance preparing for homeownership. As a result, the proposed policy change increases housing choice for those families.

Status

Implemented and Ongoing

The original HOAP portion of this initiative is implemented and ongoing, with two exceptions.

- Rather than establishing no minimum down payment from the family's resources, DCHA currently requires that at least one percent of the purchase price come from the family's personal resources.
- DCHA does not limit the circumstances under which a family utilizing a voucher for homeownership can stop using it for that purpose and begin using it for rental assistance to elderly and/or disabled families and those families who have lost income that cannot be replaced. For full details about current limitations, please see Chapter 15 of DCHA's Administrative Plan.

Not Yet Implemented

DCHA requested approval for the HOAP for households paying 100% of contract rent in February 2019. The agency is planning to implement the initiative after its next administrative plan update, scheduled for FY2025.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2026.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

Initiative 4: Streamlined Recertification Process

(Previously named: "Simplified Certification and Multi-Year Income Recertification")

Description/Update

This initiative has two parts—Simplified Certification and Multi-Year Recertification, both designed to make the income and eligibility determination process more efficient and cost effective. The initiative has a dual benefit. First, saving staffing costs so resources can be used where they bring more benefit to DCHA's customers. Second, providing greater convenience, as well as incentives for self-sufficiency, to residents of DCHA properties and applicants for housing or assistance provided through DCHA.

Simplified Certification

At final determination of eligibility, as applicants are pulled from the waiting lists and forwarded to HCV or Public Housing for lease-up, DCHA extended the length of time to 180 days that the verified application data is deemed valid. This has reduced the amount of duplicative work required of eligibility staff in DCHA's Client Placement Division as well as reduce the time necessary to build a qualified applicant pool.

Multi-year Recertification—Biennial Recertification

DCHA began conducting recertifications every two years, instead of annually, in FY2007 for HCV participants and FY2012 for public housing residents. To encourage greater self-sufficiency, DCHA also revised the FY2015 MTW Plan to eliminate the requirement that families report increases in earned income greater than \$10,000 between scheduled recertifications. Currently, families in the voucher and public housing programs do not have to report any increases in earned income between scheduled biennial recertifications. However, a family may request an interim recertification and reduction of rent as a result of a reduction in income.

Multi-year Recertification – Triennial Recertification

As part of the FY2016 MTW Plan, DCHA proposed and received HUD approval to implement triennial recertifications in the HCV and Public Housing programs for Elderly and/or Disabled households on fixed income.

Status

Implemented and Ongoing.

Planned Non-Significant Changes

DCHA is changing the name of this initiative from "*Simplified Certification and Multi-Year Income Recertification*" to "*Streamlined Recertification Process*" to improve clarity and accessibility.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

Initiative 7: DCHA Subsidiary to Act as Energy Services Company

Description/Update

In 2007, following HUD's approval of DCHA's Energy Capital Improvement Plan, DCHA closed an Equipment Lease/Purchase Agreement in the amount of \$26,024,925. DCHA used Construction Services Administration, LLC (CSA), a wholly owned subsidiary of DCHA, as its Energy Services Company (ESCO). DCHA used HUD provisions allowing, for the purposes of energy subsidy calculation, a frozen base of consumption costs plus actual consumption costs savings to amortize private financing of a comprehensive DCHA energy management program. The frozen base method of the operating subsidy calculation was used for some aspects of the program in conjunction with an add-on for energy conservation-related debt service for other aspects of DCHA's comprehensive energy conservation program.

Using its MTW Authority, DCHA may, without prior HUD approval, modify the current energy performance contract (EPC) or enter new performance contracts with Energy Service Companies (ESCOs), also called Energy Service Agreements (ESAs), and determine the terms and conditions of EPCs, provided that, with respect to each contract, (i) the term does not exceed 20 years and (ii) the Agency maintains adequate files demonstrating EPC performance. DCHA or its agents or subsidiaries may also function as its own ESCo, provided that any financing complies with requirements (i) through (ii) of this paragraph. HUD will honor the terms and conditions of such contracts during and beyond the term of DCHA's MTW Agreement.

DCHA has also received approval to pledge its reserves or other funds for use during the term of the MTW demonstration to guarantee the payment of debt service in the event the energy savings are not adequate to cover debt service costs.

DCHA secured \$26 million in funding to implement DCHA's energy efficiencies as articulated in the Agency's plan. As of the end of FY2013, the entire \$26 million of the loan proceeds were expended. In FY2012, DCHA took advantage of a favorable interest rate environment and refinanced its energy loan. The flexibility to execute the new loan documents without HUD approval greatly simplified and sped up the process, saving an unknown amount of DCHA and HUD staff time. The refinancing shortened the term on the loan while keeping payments relatively unchanged, greatly reducing interest expenses over the life of the loan.

HUD released PIH Notices 2011-36 and 2014-18 providing guidance to allow PHAs the ability to retain 100% of cost savings if they (1) reduce energy consumption and (2) produce energy. In addition, HUD has provided further guidance to allow PHAs to capture future savings from ECIP Phase I as an incentive to upgrade the ECIP Phase I equipment at the end of its useful life.

Status

Implemented and Ongoing.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2026.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

Initiative 8: Local Payment Standards Policy

(Previously named: "Modifications to Methods for Setting Total Tenant Payment and Determining HCV Market Rents and Promoting Deconcentration")

Description/Update

As part of DCHA's ongoing efforts to maximize the resources available for DCHA's customers and to reduce the administrative cost of making these resources available, DCHA has:

- Established a local method for setting voucher payment standards; and
- Limited moves so the new lease can only start on the first of a month, thereby avoiding overlapping leases and duplicative payments.

DCHA explored options to enhance the housing authority's ability to encourage voucher participants to exercise their choice in housing, especially related to moving into neighborhoods with low levels of poverty. DCHA created a method for establishing Payment Standards that provides maximum access to neighborhoods across the District based on an annual analysis of unassisted market units that have been rented (not advertised) within each neighborhood in the District of Columbia.

The agency continues setting payment standards annually that allow voucher holders broad housing choice. In FY2019, DCHA set the agency's payment standard at up to 187% of HUD Fair Market Rents (FMRs). In FY2023, this payment standard was re-affirmed at up to 187%. In FY2024, DCHA completed a market analysis and will continue setting payment standards of up to 187% of FMR for all bedroom sizes. This local payment standard will help DCHA maintain maximum access to neighborhoods across the District for voucher participants without adversely impacting our ability to serve as many households as possible.

DCHA closed the rent reasonableness portion of this initiative in FY2024 whereby the agency conducted market analysis to set reasonable rents by submarket. The agency has since procured an industry-standard third-party database of rental units to make rent reasonableness determinations based on comparable units (including factors such as location, quality, size, unit type, age of the contract unit, amenities, and utilities provided by the owner).

Status

Implemented and Ongoing.

Planned Non-Significant Changes

DCHA is changing the name of this initiative from *"Modifications to Methods for Setting Total Tenant Payment and Determining HCV Market Rents and Promoting Deconcentration"* to *"Local Payment Standards Policy"* to improve clarity and accessibility.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

Initiative 11: Site Based Waiting Lists

(Previously named: "Site-based In-take and Waiting List Management of Public Housing and Redeveloped Properties")

Description/Update

DCHA has undertaken a phased approach to the implementation of site-based waiting lists in its public housing and redeveloped properties. DCHA first implemented site-based waiting lists that are managed at the site-level for Mixed Finance properties.

The next phase of this initiative is to implement centrally managed site-based waiting lists at DCHA's conventional public housing sites. In FY2024 DCHA completed a multi-phase review and clean-up of its public housing waiting list. DCHA plans to open-site based waiting lists for public housing sites in late FY2025 or FY2026. DCHA is currently in the process of revising its applications and waiting list policies in the FY2025 Admissions and Continued Occupancy Plan

(ACOP) in order to further describe site-based waiting lists for public housing properties (as per prior HUD approval in DCHA's MTW Plan). DCHA anticipates using random selection as part of the reopening of its waiting lists. The specifics of site-based waiting lists will be publicized as part of the public notices for the reopening.

DCHA will provide further updates on the implementation of public housing site-based waiting lists in the FY2025 MTW Report.

Status

Implemented and Ongoing.

Planned Non-Significant Changes

DCHA is changing the name of this initiative from *"Site-based In-take and Waiting List Management of Public Housing and Redeveloped Properties"* to *"Site-based Waiting Lists"* to improve clarity and accessibility.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

Initiative 17: Re-Inspection Fee and Abatement Process for HQS Violations

(Previously named: "Change in Abatement Process, including Assessment of a Re-Inspection Fee as an Incentive to Maintain Acceptable Housing Quality Standards in Voucher Assisted Units")

Description/Update

DCHA is required to conduct a re-inspection for units that fail an annual HQS inspection to ensure that the owner has corrected the violations. If the landlord does not correct the violations by the time of the re-inspection, DCHA must abate the landlord's payment and terminate the HAP contract. In FY2010, DCHA conducted third inspections on over 7% of its HCV units.

Prior to termination of the HAP contract (which is typically 30 days from the abatement), if the owner wants DCHA to come out for a third inspection, DCHA is using its MTW authority to charge the landlord a fee for the third inspection. As of FY2025, the current fee for the third inspection is \$75.00. The fee for the inspection does not remove the abatement of the subsidy; rather, DCHA is seeking to impose this fee due to the administrative costs of conducting an inspection that is not required. If the unit passes after the third inspection, DCHA will lift the abatement effective the date the unit passed.

Status

Implemented and Ongoing.

Planned Non-Significant Changes

DCHA is changing the name of this initiative from *"Change in Abatement Process, including Assessment of a Re-Inspection Fee as an Incentive to Maintain Acceptable Housing Quality Standards in Voucher Assisted Units"* to *"Re-Inspection Fee and Abatement Process for HQS Violations"* to improve clarity and accessibility.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

Initiative 18: Creation of Local Authorization and Release of Information Form with an Extended Expiration to Support the Biennial Recertification Process

Description/Update

Since DCHA moved to biennial recertifications for HCV and Public Housing, a longer release of information authorization is needed. Currently, income data provided for Public Housing and Housing Choice Voucher program participants through the HUD Enterprise Income Verification (EIV) system is only accessible for 15 months with a signed HUD Form 9886 (HUD 9886). The HUD 9886 is a release of information authorization signed by every adult member of the household. The HUD 9886 gives DCHA the ability to conduct third party verifications of income for up to 15 months from the date the adult members complete the form. If resident/participant data is not accessed within the 15-month period, DCHA will lose the ability to run the third-party income data. The extension of the expiration date ensures compliance with annual file reviews.

Using its MTW authority, DCHA has developed a local form that gives the Agency the authority to conduct 3rd party verifications of income for each adult member for 36 months instead of 15 months as long as said member remains part of the household composition of the assisted household. This form is executed for each adult member of the participating household and conforms with 24 CFR 5.230 as required to access EIV. The packet sent to each participating household at the time of recertification contains a reminder that the authorization form was previously signed.

Status

Implemented.

DCHA will close this activity under the FY26 MTW Plan.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2026.

Planned Significant Changes

DCHA will close this activity under the FY26 MTW Plan. The prior version of the HUD-9886 form expired after 15 months. Beginning on January 1, 2024, following updated HOTMA guidance³, the new version of the HUD-9886 does not have an expiration date. As such, this MTW initiative is no longer needed.

³ In February 2024, HUD released the "Implementation Guidance: Sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2026 (HOTMA) notice (PIH 2023-27).

Initiative 20: Enhance Neighborhood Services within Public Housing Communities

Description/Update

As a means to better integrate Public Housing developments into surrounding communities while encouraging self-sufficiency, DCHA will explore converting public housing dwelling units into non-dwelling units to create space for providers of services that help our residents/participants achieve self-sufficiency. These units will be classified as MTW Neighborhood Services Units in PIC. Many of these providers will serve both Public Housing residents and members of the surrounding community, including HCV participants, reducing the isolation that characterizes many Public Housing developments. In addition, the on-site services will augment those available elsewhere in the community so available resources are used efficiently, and residents will be encouraged to leave the community to meet some of their needs.

Working with Resident Councils to identify needs, opportunities, and resources, DCHA will provide space to organizations providing the following range of services: occupational skills/job training, GED preparation, after school mentoring and tutoring, parenting training and support, case management and counseling, money management and business development, nutrition classes, health screening, gang intervention and violence prevention. This activity augments workforce development activities already provided to DCHA Public Housing residents and HCV participants. It is expected that these services will result in reductions in drug abuse, crime prevention, healthier communities and a reduction in maintenance and management costs.

DCHA will designate conventional Public Housing units as non-dwelling space based on need, unit configuration, existing services in the area, and availability and interest of service providers. Units will be determined based on the amount of space needed to support the on-site activities. DCHA will carefully consider development/unit designations, weighing the need to maintain available housing opportunities with the importance of families achieving self-sufficiency. Upon approval of this initiative, DCHA will submit requests with descriptions of services to be provided and justifications to the HUD field office to designate specific units as MTW Neighborhood Service Units.

Status

Implemented and Ongoing.

DCHA had previously been utilizing 48 units at Sibley Plaza for a DC Department of Behavioral Health funded residential substance abuse treatment program called Safe Haven. Due to operational and financial challenges during the COVID-19 pandemic, the Safe Haven program has since closed. DCHA is currently working with the HUD Field Office to return these units to general occupancy. As the time of this plan submission, these units remain offline. Further updates will be provided in the FY25 MTW Report.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2026.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

Initiative 23: Encourage the Integration of Public Housing Units into Overall HOPE VI Communities

Description/Update

DCHA's mixed-finance developments often include a combination of public housing rental units and market-rate homeownership units. This blend can lead to governance challenges and resident disconnect. To support community cohesion and equitable participation, DCHA implemented this activity to strengthen Homeowner and Tenant Associations (HOTAs) or Community Associations across these properties.

Many of these associations currently operate with limited budgets, which restricts their ability to effectively engage residents and build inclusive communities. To ensure public housing residents are full participants in their communities, this activity requires payment of HOTA dues either directly by residents or by their landlords on their behalf. DCHA uses its MTW flexibility to implement a local rent policy. Specifically, DCHA applies a HOTA dues allowance, similar to a utility allowance, and has authorized mixed-finance property managers to establish income-based rent and fee structures that cap total housing costs—including rent and HOTA dues—at no more than 30% of a tenant's adjusted income.

Currently, DCHA pays HOTA fees directly rather than as an allowance.

Status

Implemented and Ongoing.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2026.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

Initiative 25: Local Blended Subsidy

Description/Update

Overview

In the FY2013 MTW Plan, DCHA received approval from HUD to create a local blended subsidy ("LBS") to improve its ability to leverage public and private investment in order to meet its capital improvement needs. Under the LBS DCHA combines its MTW section 8 and public housing funds to subsidize units reserved for families earning at or below 80 percent of Area Median Income (AMI). This is done to create an operating expense level which is adequate to provide essential operating services while also supporting debt to meet capital needs in a manner structured to maximize the amount of equity (primarily through Low Income Housing Tax Credits "LIHTCs") available to redevelop or replace public housing with minimal public housing capital funds.

DCHA used its LBS flexibility on targeted developments where the units require a subsidy level other than that available through the traditional public housing program and/or would experience operational and administrative inefficiencies due to the combination of different housing types.

DCHA received initial approval from HUD for LBS flexibility at six projects:

- Highland (approved as part of FY2014 MTW Plan)
- The Bixby (Lofts at Capitol Quarter) (approved as part of FY2014 MTW Plan)
- Park Morton/Bruce Monroe (approved as part of FY2019 Plan)
- Kenilworth Courts Phase 1 (approved as part of FY2020 Plan)
- Barry Farm (approved as part of FY2022 Plan)
- Sursum Corda Turnkey and Sibley Townhomes (approved as part of FY2023 Plan)

In the FY2024 MTW Plan, DCHA removed all the above properties from LBS except those already implemented, Highland and The Bixby, as the removed properties were redeveloped using other tools.

The following provides descriptions and statuses of the two LBS projects in place:

The Bixby (Lofts at Capitol Quarter)

No public housing capital funds were used to create the 39 units of new replacement public housing units to be operated in accordance with public housing requirements. The total development cost of this project was approximately \$12 million fully covered with a capital contribution from the market component of \$2.5 million, approximately a \$5.4 million permanent loan from Citi Community Capital and approximately \$4 million in tax credit equity from RBC. The leverage on the Lofts at Capitol Quarter is evidenced by a permanent loan and the capital contribution to the construction cost of the affordable units from the market component.

DCHA provided supplemental MTW Block Grant funding which will fund the difference between an amount not to exceed 110% of area wide FMR and the total expense level computed in accordance with the Operating Fund Rule. Specifically, the terms for this project provide that the DCHA provide MTW funds up to an expenses level equal to 110% of FMR or the amount needed to cover operating costs, debt service, incentive management fee and required reserves (i.e., replacement reserves), whichever is less. Moreover, any excess funds will be returned to DCHA based on an annual audit and true up. Any program income generated by the affordable units is used for MTW purposes. The estimated MTW block grant funds needed on an annual basis is just over \$400,000 which is covered by the cash flow to be earned by DCHA on the market component of this project as evidenced in the Rental Term Sheet provided to HUD.

With respect to the LBS used on the Bixby, the funding equates to approximately 32 fewer vouchers being utilized. Cash flow on the market units in this project is expected to be realized after the first year of utilizing LBS. At that point, the revenue will eliminate the need for LBS and those funds will be available to assist additional families.

Highland Dwellings

Work at Highland consisted of a combination of rehabilitation and new construction of 208 low-income units where between 70-75% of the capital funds were generated through private debt and equity. The total development cost for this project was approximately \$62 million and the debt and equity raised using LBS was over \$46 million (consisting of a permanent loan from Capital One of approximately \$21.6 million and tax credit equity of approximately \$25 million from Wells Fargo).

Similar to the Lofts, Highland did not use MTW funds for capital costs, but MTW Block Grant funds are used to supplement funds available for the 208 ACC units through the Operating Fund Rule. The estimated annual MTW Block Grant fund is approximately \$1.7 million (as indicated in the Rental Term Sheet submitted to HUD for this project). The amount of MTW Block Grant funds is essentially equal to the amount previously modeled when the project was proposed to be 125 ACC units and 83 PBV units. This enabled DCHA to obtain subsidy for all units under ACC while providing no more funds than would have been provided as HAP funds using its MTW Block Grant. This was done as the previous method for financing the project was tremendously inefficient as it layered an extreme overhang for the PBV units creating millions of dollars in investor reserve requirements over and above that required using LBS, while generating significantly less tax credit equity and debt financing. Thus, LBS enabled the project to be redeveloped in a much more comprehensive manner. For example, rather than up to \$3 million in affordability reserves being required, there was only \$1 million required by investors. As opposed to generating approximately \$24 million in debt and equity, the project generated over \$46 million. The rents levels can be up to 110% of FMR; however, rent levels are modeled at an amount approximating Low Income Tax Credit (LIHTC) rents, which are well below 110% of FMR. Therefore, DCHA has and intends to use its LBS authorization in a manner that maximizes funds for its redevelopment while minimizing the funds required to achieve needed investor and debt contributions.

The LBS used on Highland equated to 83 fewer utilized vouchers. This has given DCHA the ability to preserve existing public housing with this private capital infusion and frees-up future capital funds due to the properties self-sufficiency with meeting its capital needs. In addition, this has given DCHA the ability to utilize its capital funds from Highland to serve an additional 40 families. This development is operated in accordance with public housing requirements.

Status

Implemented and Ongoing.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2026.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

Initiative 32: Modifications to DCHA Self-Sufficiency Program – Pathways to Self-Sufficiency

Description/Update

DCHA is committed to providing all residents served by the agency's housing programs opportunities for achieving economic independence and self-sufficiency. Understanding that one size does not fit all when it comes to the resources and supports a family may need to improve their economic condition, DCHA's self-sufficiency platform consists of a suite of resources and incentives that, when accessed, provide pathways to employment, education and homeownership/unassisted rental.

Modified Family Self-Sufficiency Program

As part of DCHA's FY2019 plan submission, the agency proposed a redesign of the existing Family Self-Sufficiency (FSS) program for Housing Choice Voucher households. Given feedback from residents, staff and key stakeholders during and following the public comment period of the FY2019 MTW Plan process, DCHA decided to propose restructuring the agency's self-sufficiency programs through this modified initiative. Over the years, the agency has maintained multiple programs that address various aspects of self-sufficiency. In an effort to consolidate and streamline resources and staff capacity, DCHA will explore bringing all the self-sufficiency programs under one umbrella through this initiative. The program will serve both public housing and Housing Choice Voucher clients and build upon the core design of Initiative 32 as it was approved in the FY2019 MTW Plan.

In the FY2019 MTW Plan, DCHA received authority to transition from the traditional FSS model to one that supports DCHA's multi-pronged approach to moving families toward self-sufficiency. Specifically, DCHA was approved to create an incentive structure that requires MTW authority to eliminate the traditional escrow model. These program changes would provide incentive investments in the form of an income exclusion, rent cap, educational stipend, mortgage down payment/rental grant or employment grant based on the self-sufficiency pathway chosen. In the FY2020 MTW plan, DCHA used the "Pathways to Self-Sufficiency" model to serve both Housing Choice Voucher clients and public housing residents.

Through this initiative, DCHA waives certain provisions of the FSS Re-Authorization Legislation (Economic Growth, Regulatory Relief, and Consumer Protection Act) that became public law on May 24, 2018 in order to design a program that aligns with the funding reality of the agency and program capacity. In particular:

- The FSS reauthorization law allows the contract of participation to be signed by any adult member of the family. For purposes of DCHA's Pathways to Self-Sufficiency, only one Contract of Participation (COP) can be signed per household. DCHA will allow only the Head of Household listed on the lease to sign the COP for the Homeownership Pathway.
- The FSS reauthorization law allows the contract of participation to last five years from the first recertification after execution of the contract of participation. DCHA will start the clock on the five-year period after the contract is signed and will not wait until the first recertification. This is due to the unique incentive payment structure which relies on a 5-year program period.
- The FSS reauthorization law says that for households that port into the agency, the receiving PHA no longer has discretion to enroll the porting FSS participant into the receiving PHA's FSS program. The porting participant now must enroll or be party to an agreement that the porting participant will continue enrollment in originating PHA's FSS program. DCHA's FSS program is so different than other housing authority FSS programs that DCHA will not accept incoming port-in clients. They would need to sign a new contract under the DCHA FSS rules. For clients that port-out and have not completed the program, they will be terminated from the DCHA FSS program and not receive any incentive payments.

Modified Apprenticeship Program

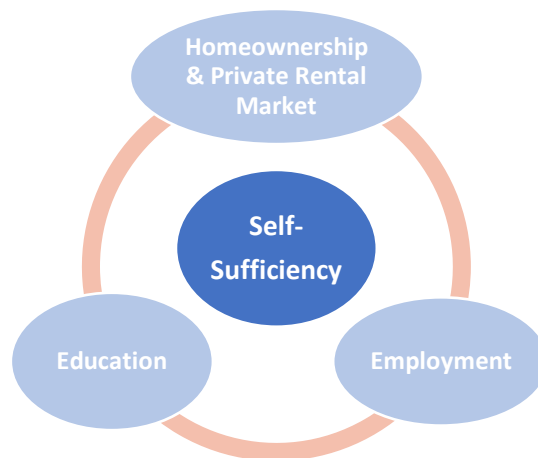
One of DCHA's existing employment pathways is the Modified Apprenticeship Program (ATP) for DCHA residents and Section 3 participants. ATP is a six-month work-based training opportunity in which participants learn job skills through on-the-job training, earn income while they learn, and increase the likelihood of permanent employment opportunities. At the end of each cohort period, the top

performers compete for permanent full-time positions within DCHA, contractors who do business with DCHA, and local business/government partners.

To ease the transition of the impact of increases in household income on the calculation of rent, DCHA is proposing the establishment of an income exclusion for ATP participants currently living in public housing or receiving HCV voucher subsidy.

DCHA does not anticipate more than 30 participants in each cohort. Based on the program stipend, DCHA estimates that this will represent approximately \$60,000 to \$65,000 in foregone rental income for each cohort.

Figure 1. DCHA Pathways to Achieving Self-Sufficiency



Implementation

With the re-proposal of this initiative in FY2020, program size increased to 400 participants for those participating in the homeownership/private rental market, education, and employment as originally designed when proposed in FY2019 to reflect 1:50 ratio of Self-Sufficiency Coordinators to participants. This would require 8 FSS coordinators. The goal is to serve 250 public housing residents and 150 HCVP clients.

In addition, 30 slots per ATP employment cohort were established. ATP does not operate under the same Contract of Participation model as the other components of the pathways model. Resources, including training and supportive services, are provided through the existing Office of Residents Services and Property Management Operations framework. As such, a Self-Sufficiency Coordinator is not required.

The following program slots are allocated to each self-sufficiency pathway:

- Homeownership/Renting in Private Rental Market =100
- Education= 150
- Employment = 180 (150 + 30 ATP)

Based on the interest and eligibility for a particular pathway, DCHA may shift slots between the three pathways to provide opportunities for maximum participation by DCHA residents.

HCV Households—Implementation of the new framework began as FSS households enrolled under the previous program transitioned off the program. Open slots are administered to both public housing and HCVP clients under the new model. The families currently on the FSS waiting list are offered new program slots first.

Public Housing Households—Households that need to be relocated from their public housing units will receive priority to enroll in the program.

Pathways to Self-Sufficiency —Incentive Model

Participation Elements	Pathway			
	Homeownership/ Private Rental Market	Education	Employment: Apprenticeship Training Program	Employment: General Program
Incentives	\$2,000/year set-aside for each year in the DCHA Self-Sufficiency Program Disbursed upon successful completion of the program. Maximum disbursement = \$10,000: Homeownership- in time for settlement. Private rental market – approval for lease.	A maximum of \$2,000 made available each year to be paid by DCHA toward tuition at a community college, four-year college, professional certification, or vocational training program. DCHA will make tuition payments directly to the education institutions Earned income exclusion from calculation of rent (using \$ from rent for education prep and tuition)	Tenant portion of rent will remain the same as long as the family is in the program – exclusion of stipend from the calculation of rent Stipend is based on hours worked during the program Includes Job Readiness and Life Skills training, and job placement upon completion of program	Tenant portion of rent will remain the same as long as the family is in the program \$600 for each 12 months of consecutive part-time/full-time employment
Basic Eligibility	Households with incomes between 50% and 80% of median income range, depending on household size = \$41,050-\$102,250	GED or High School Diplomas Pass an educational readiness assessment. Part-time employment.	Application and interview process	Head of Household has \$0 earned income
Program Length	Up to 5 Years	Up to 5 Years	6 Months	Up to 5 Years
Program Size (Initial) Based on Staff Capacity	100	150	30	150
Financial Literacy	Core component	Core component	Core component	Core component

For households not meeting the eligibility requirements for this component of the DCHA pathways to self-sufficiency program, they will have access to the suite of resources made available through DCHA's Workforce Development Initiative (WDI) headquartered at the agency's EnVision Center. Many of the same resources are available through WDI minus the case management and incentive investments.

Status

Implemented and ongoing.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2026.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

Initiative 33: Waiver for Third-Party Housing Quality Standards (HQS) Inspections

Description/Update

DCHA's Housing Choice Voucher Program (HCVP) Inspections division staff perform Housing Quality Standards inspections on DCHA- owned and DCHA-affiliate units that receive voucher assistance rather using than third-party inspectors. Using a third-party inspections contractor slowed the leasing process and caused delays on quality control and emergency inspections. The flexibility for DCHA to use its own inspectors creates greater efficiencies and expedites the lease-up process for families in need of housing.

Status

Implemented and ongoing.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2026.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

Initiative 35: Local Elderly Family Definition

Description

Using MTW flexibility, DCHA established a new, local definition of "elderly": any family whose head of household, co-head, or spouse is age 55 or above. By adopting the local definition of elderly, DCHA will expand housing choice for near-elderly individuals, which offers focused service delivery and improved options for aging-in-place.

For the purpose of referring families to units in certain public housing or project-based elderly or elderly/disabled building, DCHA will use the above local definition of "elderly." This definition will also be used for properties during the Restore-Rebuild (formerly Faircloth-to-RAD) conversion process.

Modifying the definition of elderly reflects the way DCHA's public housing buildings currently operate, wherein 15.6% of DCHA's senior/disabled building population is already in the 55-61 range.

Status

Implemented and ongoing. The local definition of elderly is being implemented for public housing as part of DCHA's FY2025 updates to its ACOP, and is also reflected in elderly preferences implemented in certain Restore-Rebuild sites.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2026.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2026.

B. Activities Not Yet Implemented

DCHA does not have any not yet implemented MTW activities (initiatives).

C. Activities on Hold

There are no current MTW activities (initiatives) currently on hold.

D. Closed Out Activities

MTW Activity		Fiscal Year			Close Out
Number	Name	Approved	Implemented	Closed	Reason/Outcomes
1.2.04	Locally Defined Site and Neighborhood Standards	2004	2004	2011	MTW flexibility was not necessary to establish local site & neighborhood standards for HOPE VI developments.
2.4.04	Special Occupancy for Service Providers	2004	N/A	2005	Activity closed following resident and community feedback.
3.1.04	Voluntary Resident Community Service	2004	N/A	2004	Closed following HUD legal determination that the community service requirement was not subject to the MTW Standard Agreement.
3.2.04	Resident Satisfaction Assessment	2004	2004	2004	Activity was found to be too cost prohibitive to continue in future years.
1.7.05	Security Deposit Guarantee Program	2005	N/A	2010	Closed due to MTW funding limitations and lack of local funds to supplement the activity.
1.8.05	Modification to HCV Inspections Scheduling	2005	N/A	2006	Upon exploration, DCHA could not find sufficient patterns of consistency among landlords or properties to justify reducing inspection frequency. Due to the high failure rate of HQS inspections and the age of the housing stock, the benefits of annual inspections outweighed any potential cost savings.
Current: 6 Previous: 2.3.04 & 2.5.05	Modifications to Pet Policy	2005	2005	2016	DCHA was informed by HUD that the approval it received in 2005 for this activity was being rescinded. This decision was based on an evaluation of the relevance of Section 227 of the Housing and Urban-Rural Recovery Act of 1983 (12 U.S.C. 1701r-1) and its implementing regulations under 24 CFR Part 5 Subpart C, as they applied to DCHA's use of its MTW authority to establish its pet policy.
3.3.05	Streamlining Resident Community Service	2005	2005	2012	DCHA closed the activity with the intention of re-thinking it's approach to the policy. DCHA may re-introduce a new activity in the future.

9	Streamlined Operating Subsidy Only (OPERA) Protocol— Operating Assistance for Rental Housing	2005	2005	2016	DCHA was unable to successfully utilize the authority provided by this initiative and decided to close it out.
Current: 10 Previous: 3.4.05	Supporting Grandfamilies	2005	2005	2016	Based on local designation of grandparent stipends, there is no need to provide an exclusion for these payments under MTW authority, as HUD guidelines already allow for it.
4.2.05	Revolving Loan Fund for HCV Landlords	2005	N/A	2009	Closed due to MTW funding limitations and lack of local funds to supplement the activity.
4.3.05	Flexible Funding	2005	2005	2010	A standalone activity was not required as funding flexibility is included in the MTW Standard Agreement.
4.4.06	Reformulation of HUD Forms	2006	2006	2010	DCHA found that while it may be necessary to modify HUD forms as part of an MTW initiative in the future, this initiative, in and of itself, does not address any of the three statutory objectives. If modifications to HUD forms are required, that action will be proposed as part of a specific MTW initiative.
Current: 13 Previous: 2.6.07	Enhanced Public Housing Lease Enforcement Operations	2007	2007	2012	Closed due to lack of progress in implementing this activity. DCHA still remains committed to providing the residents the flexibility in establishing property specific community rules. In the future, if there is renewed interest to move forward by resident councils the initiative will be resubmitted for HUD approval.
1.11.08	Maximizing Public Housing Subsidies	2008	N/A	2008	DCHA explored combining ACCs in order to generate more adequate public resources to support rising public housing operational costs, however the agency decided not to move forward with the activity as proposed.
Current: 14 Previous: 3.6.08	Streamlining the Transition from Project-Based to Tenant-Based Vouchers	2008	2009	2012	N/A
Current: 15 Previous: 3.7.08	Reform Housing Quality Housing Standards	2008	N/A	2018	Based on DCHA's final assessment, the agency determined this activity was no longer viable due to variability of inspection results across agencies.
Current: 21 Previous: 2.10.12	DCHA Local Mixed Subsidy Program	2012	N/A	2016	This activity was initially proposed to support the redevelopment of Highland Dwellings. DCHA identified a more effective financing strategy (see <i>Initiative #25: Local Blended Subsidy</i>) and therefore this activity was never implemented.
26	Local Investment Policy	2014	N/A	2017	DCHA decided to close this initiative, as ongoing review of investments and

					potential returns did not justify proceeding with this activity.
30	HQS Scheduling	2015	N/A	2017	DCHA closed this initiative as the flexibility it granted was no longer needed based on the projected number of eligible landlords/owners under the <i>HQS Biennial Inspections for Landlords in Good-standing</i> (Initiative #29) MTW activity.
28	Rent Reform Demonstration (HCVF)	2014	2014	2020	DCHA was selected to participate in the Rent Reform Demonstration commissioned by HUD to evaluate alternative HCV rent reform policies. Following the completion of the demonstration study, DCHA transitioned participating residents back into the traditional HCV program. DCHA closed the activity, as its objectives were completed. Outcomes and metrics from the demonstration can be found in DCHA's FY2023 MTW Annual Report and in the Rent Reform Demonstration reports on the HUD website.
29	HQS Biennial Inspections for Landlords in Good-Standing	2015	2018	2020	DCHA closed this activity because MTW flexibility to implement HQS biennial inspections is obsolete due to changes in regulation. DCHA will follow the guidelines as set forth in the FY2014 omnibus appropriations bill and accompanying federal register notices.
Current: 19 Previous: 4.5.11	Establishment of Resident Driven Community Based Programs to Improve Customer Service and Foster Greater Resident Empowerment	2011	N/A	2023	DCHA closed this initiative because it implemented alternative engagement strategies for senior residents across its portfolio.
27	Family Stabilization through Housing and Education Demonstration	2014	N/A	2023	DCHA closed this initiative because the agency refers youth to the District of Columbia Office of the State Superintendent of Education (OSSE) truancy program.
Current: 2 Previous: 1.3.04	Designation of Elderly-Only Properties	2004	2004	2023	DCHA closed this initiative in acknowledgement of HUD's decision, as transmitted via its review on September 30, 2022, that the MTW Standard Agreement does not provide authorization to waive the Designated Housing Plan regulations. The Agency is submitting a Designated Housing Plan for HUD review for the applicable sites.
Current: 5 Previous: 2.2.04	Modifications to Market-Based Rents	2004	2004	2023	DCHA closed this initiative in acknowledgment of HUD's decision, as transmitted via its review on September 30, 2022, that the MTW Standard Agreement does not provide authorization to set a different flat rent rate or remove resident choice, even when intended to benefit residents. The

					agency updated its ACOP in FY2023 to provide residents with an annual choice of flat or income-based rents. DCHA never implemented the Local Public Housing Flat Rent Schedule as approved under this initiative.
Current: 16 Previous: 2.7.11	Requirement to Correct Minor HQS Unit Condition Discrepancies—Tenant/Landlord Self-Certification	2011	2012	2023	DCHA closed this activity because it is obsolete. DCHA does not rely on self-certifications and instead re-inspections occur immediately following the corrective period. As was the goal, no voucher participants were allowed to move/transfer without corrected minor violations and no landlords were granted a rent increase while this initiative was fully implemented.
34	Virtual Housing Quality Standards (HQS) Inspections	2021	2021	2023	DCHA closed this activity because the MTW flexibility to implement virtual/remote video inspections is obsolete due to changes in regulation. DCHA will follow the guidelines as set forth in PIH Notice 2020-31.
24	Simplified Utility Allowance Schedule	2012	2014	2024	Effective July 2023, DCHA reverted to the standard HCV operations requirements of completing a utility allowance study annually and updating the utility allowance schedule accordingly. This initiative was closed in the FY2024 plan.
31	Unit Protection Incentive Program	2018	N/A	2024	DCHA closed this initiative in its FY2024 plan since the HALO program is no longer active.

Section V. Planned Application of MTW Funds

A. Planned Application of MTW Funds

Under MTW, DCHA consolidates the agency's three major funding sources into a Single Fund Budget:

- Public Housing operating subsidy;
- Capital fund program; and
- Section 8 Housing Choice Voucher program.

This section of the DCHA MTW Plan describes the agency's planned sources and uses of that budget.

Estimated Sources of MTW Funding for the Fiscal Year		
Estimated sources and amounts of MTW funding by FDS line item.		
Sources		
FDS Line Item	FDS Line-Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$16,025,255
70600	HUD PHA Operating Grants	\$445,210,120
70610	Capital Grants	\$26,302,226
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	-
71100+72000	Interest Income	-
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	\$307,479
	Revenue	\$487,864,980
* Refer to Appendix for additional information to Section V: Planned Application of MTW Funds		

Estimated Application of MTW Funding for the Fiscal Year		
Estimated application of MTW funding in the plan year by FDS line item.		
Application		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$53,103,322
91300+91310+92000	Management Fee Expense	\$34,221,930
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	\$2,913,084
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	-
93500+93700	Labor	-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$591,956
95000 (95100+95200+95300+95500)	Total Protective Services	-
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$428,336
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	-
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	-
97100+97200	Total Extraordinary Maintenance	-
97300+97350	Housing Assistance Payments + HAP Portability-In	\$387,304
97400	Depreciation Expense	-
97500+97600+97700+97800	All Other Expenses	-
	Expenses	\$478,562,754

160	Capital Assets, Net of Depr.	\$9,302,226
97400	Depreciation Expense	-
	Total Application of Fund	\$487,864,980
* Refer to Appendix for additional information to Section V: Planned Application of MTW Funds		

Please describe any variance between Estimated Total Revenue and Estimated Total Application:

N/A

Planned Application of MTW Funding Flexibility

Describe the Activities that Will Use Only MTW Single Fund Flexibility

Single-Fund Budget Flexibility is used to meet many of the Agency's goals under the MTW Program. In FY2026, DCHA will use grant funds to achieve the following:

- Fund Public Housing Operations
- Modernize and renovate conventional public housing buildings and units to address deferred maintenance and life safety issues at DCHA's conventional Public Housing sites
- Supplement operating fund payments to create new and replacement low-income housing units.
- Supplement Public Housing ACC for Veterans' transitional housing located at a DCHA's Ontario Road
- Implement fund to improve voucher success rates and provide landlord incentives.
- Create and operate a workforce training site for Public Housing residents and Housing Choice Voucher participants
- Improve customer service, including efforts to maintain the agency's Customer Call Center and improvements to work-order tracking system
- Purchase and maintain Public Safety equipment and tools to improve the safety and security in and around our communities
- Evaluating the long-term debts - Public Housing Energy Performance Contract (EPC) and Public Housing Capital Fund Financing Program (CFFP) Bond against current market economic conditions and determining feasibilities of potential refinancing and optional prepayment using MTW Block Grant Fund.
- Absorb the cost of increases to contract rents during the transition from the rent reasonableness methodology previously utilized under Initiative 8 to an industry-standard rent reasonableness tool.
- Through negotiations with HUD, DCHA may use a combination of single-fund flexibility and non-Federal funds to address findings from its 2022 HUD Review.

Bond Revitalization Plan

In FY2026 DCHA will utilize its MTW flexibility and block grant funds, including MTW reserves, toward development and rehabilitation work at various DCHA owned properties. This includes the bond-revitalization plan as described under MTW Initiative #36. The bond revitalization plan will be funded by \$700 million in Industrial Revenue Bonds (IRBs) and \$70 million in DCHA's own funds and will provide investment to renovate and modernize 19 public housing properties, representing approximately 3,500 affordable units. The first phase of renovation and modernization work is anticipated to begin in the first quarter of 2026 and will include nine properties:

Phase 1 of Redevelopment:

Claridge Towers, James Apartments	Ward 2
Fort Lincoln	Ward 5
Hopkins Apartments, James Creek, Sibley Plaza, Syphax Gardens	Ward 6
Lincoln Heights	Ward 7
Knox Hill	Ward 8

Subsequent phases of the revitalization plan will include ten other public housing communities:

Harvard Towers, LeDroit Senior	Ward 1
Horizon House, Judiciary House	Ward 2
Regency House	Ward 3
Carroll Apartments, Kentucky Courts	Ward 6
Stoddert Terrace	Ward 7
Highland Addition, Woodland Terrace	Ward 8

Other Redevelopment

In FY2026 DCHA may also utilize its MTW flexibility and block grant funds, including MTW reserves, toward additional development and rehabilitation work under the Rental Assistance Demonstration (RAD) program, RAD blends, Section 18 conversions, and/or other redevelopment projects, upon HUD approval. DCHA will be considering RAD application submission for additional sites in FY2026, as listed in Section 11.A.2. During Restore-Rebuild conversions, DCHA also leverages its single-fund flexibility to increase the base value of vouchers during and after the transition from brand new public housing units to RAD PBV units.

B. Planned Application of Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning of FY – Unspent Balances*	Planned Application of PHA Unspent Funds during FY
HCV HAP	\$30,578,208	\$30,578,208
HCV Admin Fee	\$ 0	\$ 0
PH Operating Subsidy	\$ 0	\$ 0
Total	\$ 0	\$ 0

Description of planned activities and/or use(s) for unexpended Operating Fund and HCV Funding.

DCHA Plans to supplement the LIPH program with HAP reserves during FY2026 to use in program-related activities which will increase the available unit inventory and accelerate lease ups. DCHA will also use a portion of the funds toward its bond-revitalization project, as described in MTW Initiative #36 and may also use MTW reserves toward additional development and rehabilitation work under the Rental Assistance Demonstration (RAD) program, RAD blends, Section 18 conversions, and/or other redevelopment projects upon HUD approval.

C. Local Asset Management Plan

See Appendix A for the DCHA Local Asset Management Plan (LAMP).

	Yes	No
Is the DCHA allocating costs within statute?		✓
Is the DCHA implementing a local asset management plan (LAMP)?	✓	
Has the DCHA provide a LAMP in the appendix?	✓	
If the DCHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.		
<i>DCHA does not plan to make any changes to the LAMP in FY2026.</i>		

D. Rental Assistance Demonstration (RAD) Participation

Description of RAD Participation

DCHA plans to continue leveraging the Rental Assistance Demonstration (RAD) program as a strategic tool to address capital needs and ensure long-term stability across its senior and family property portfolios. By utilizing RAD, DCHA aims to support critical redevelopment efforts, complete much-needed capital improvements, and secure a reliable and stabilized subsidy structure for its properties. In FY26 DCHA may pursue conversions under RAD, a RAD Blend, and/or Restore-Rebuild for the properties listed in the table under Section II.A.2, with HUD approval.

The following DCHA public housing properties/units have been converted under RAD:

Property	Units Converted	Type of Conversion	RAD Closing Date
Colorado-Columbia	44	PBV	2018
Fairlawn Marshall	30	PBV	2018
Matthews Memorial	35	PBV	2018
Barry Farms – The Asberry*	44	PBV	2024
Henson Ridge – Phase 1	28	PBV	2024
Kenilworth 166*	101	PBV	2024
Capper Senior 1	162	PBV	2024
Total Units	444		

*Converted using Restore-Rebuild (formerly Faircloth-to-RAD)

The following DCHA public housing properties/units have a current HUD approved CHAP (Commitment to Enter into a Housing Assistance Payment Contract) in place:

Property	Units	Type of Conversion	CHAP Issued Date
MELVO (Montana Terrace, Elvans Road, Lincoln Road, The Villager, Ontario Road)	55	PBV	2018
Potomac Gardens	208	PBV	2021
Judiciary House	264	PBV	2021
Wheeler Creek	148	PBV	2022
Greenleaf Gardens	211	PBV	2024
Park Morton Phase 1	40	PBV	2025
Total Units	926		

DCHA has the following Restore-Rebuild (formerly Faircloth-to-RAD) conversions underway:

Property	Units	Type of Conversion	Anticipated Closing Date
Barry Farm 139 – Building 1A	50	PBV	2027
Barry Farm Rental Flats	42	PBV	2025
Total Units	92		

DCHA has submitted a RAD Significant Amendment in its Annual MTW Plans for the following properties/units:

Property	Units	Type of Conversion	Significant Amendment
Carroll Apartments	60	PBV	2019
Horizon House	124	PBV	2019

Regency House	160	PBV	2019
Sibley Plaza	224	PBV	2019
James Apartments	141	PBV	2019
Garfield Senior	226	PBV	2019
Harvard Towers	193	PBV	2019
Kentucky Courts	118	PBV	2019
Claridge Towers	343	PBV	2019
Judiciary House	271	PBV	2019
Ledroit Apartments	124	PBV	2019
Fort Lincoln	120	PBV	2019
Potomac Gardens	144	PBV	2019
Knox Hill	122	PBV	2019
Elvans	21	PBV	2019
Lincoln Road	20	PBV	2019
The Villager	21	PBV	2019
Montana	65	PBV	2019
Ontario Road	13	PBV	2019
Fairlawn Marshall*	30	PBV	2019
Matthews Memorial*	35	PBV	2019
Colorado/Columbia Road*	44	PBV	2019
Judiciary House (resubmitted)	263	PBV	2023
Potomac Gardens Senior & Family Midrise	208	PBV	2023
Kenilworth 166*	101	PBV	2023
Barry Farm – The Asberry*	44	PBV	2024
Park Morton Phase 1	40	PBV	2024
Wheeler Creek	148	PBV	2024
Greenleaf Senior	215	PBV	2025
Capper Senior 1*	162	PBV	2025
Henson Ridge - Phase 1*	68	PBV	2025

*Have converted under RAD or Restore-Rebuild (formerly Faircloth-to-RAD).

	Yes	No
Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.	✓	
If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?		
This is the first RAD Significant Amendment submitted for these sites for the current CHAPs.		

Section VI. Administrative

A. Board Resolution and Certifications of Compliance

RESOLUTION 25-18
TO APPROVE THE DISTRICT OF COLUMBIA HOUSING AUTHORITY
FISCAL YEAR 2026 MOVING TO WORK PLAN

RESOLUTION 25-18

TO APPROVE THE DISTRICT OF COLUMBIA HOUSING AUTHORITY FISCAL YEAR 2026 MOVING TO WORK PLAN

WHEREAS, District of Columbia Housing Authority ("DCHA") and the U.S. Department of Housing and Urban Development ("HUD") executed the Amended and Restated Moving to Work Agreement ("MTW Agreement"), effective September 29, 2010 and extended to 2038 by Congress through the Consolidated Appropriations Act of 2024, as amended, that outlines the terms and conditions of DCHA's continued participation in the MTW Demonstration Program as authorized by federal law;

WHEREAS, the proposed DCHA FY 2026 MTW Annual Plan has been prepared in accordance with the requirements in Attachment B of the MTW Agreement;

WHEREAS, the proposed capital fund budget for FY 2026 is \$65,000,000 and the proposed Capital Fund activities are set forth in the MTW Annual Plan;

WHEREAS, RAD Significant Amendments are included in the FY 2026 MTW Annual Plan for Barry Farm Rental Flats and Park Morton Phase 2;

WHEREAS, the information included in the MTW Annual Plan related to the list of anticipated properties for which DCHA may submit demolition/disposition applications does not constitute Board approval of such action or any transaction related thereto. As required by HUD regulations, the DCHA Board of Commissioners must expressly approve any application to be submitted for HUD approval. In addition, the Board must expressly approve any transactions referenced or listed in the MTW Annual Plan;

WHEREAS, during the public comment period, DCHA met with its stakeholders, including the Citywide Advisory Board to discuss the MTW Plan; and

WHEREAS, the proposed DCHA FY 2026 MTW Annual Plan has been made available to the public for a 30-day comment period, discussed at a public hearing on June 12, 2025, and comments received were considered;

NOW, THEREFORE, BE IT RESOLVED, that the Board of Commissioners hereby approves the MTW Annual Plan for FY 2026, in substantially the form distributed to the Board, and authorizes DCHA's Executive Director or his authorized designee(s) to: 1) submit to HUD the FY 2026 MTW Annual Plan; 2) take all steps necessary to finalize and secure HUD approval and implement initiatives described in the MTW Annual Plan, subject to receipt of adequate funding from HUD; 3) certify that the Public Hearing requirement has been met; and 4) execute the HUD Certifications of Compliance with MTW Plan Requirements and Related Regulations, in substantially the form attached hereto as Attachment "A".



**RESOLUTION 25-18
TO APPROVE THE DISTRICT OF COLUMBIA HOUSING AUTHORITY
FISCAL YEAR 2026 MOVING TO WORK PLAN**

BE IT FURTHER RESOLVED, the information included in the MTW Annual Plan relative to the list of anticipated properties for which DCHA may submit demolition/disposition applications does not constitute Board approval of such action or any transaction related thereto. As required by HUD regulations, the DCHA Board of Commissioners must expressly approve any applications to be submitted for HUD approval, and must expressly approval any transactions referenced or listed in the MTW Plan.

ADOPTED, by the Board of Commissioners and signed in authentication of its passage, the 9th day of July 2025.

ATTEST:



Keith L. Pettigrew
Executive Director/Secretary

APPROVED:



Raymond Skinner
Chairperson

APPROVED FOR FORM AND LEGAL SUFFICIENCY:



Amy M. Glassman
Senior Vice President & General Counsel

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (10/1/2025), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d-1), the Fair Housing Act (42 USC 3601 et seq.), section 504 of the Rehabilitation Act of 1973 (29 USC 794), and title II of the Americans with Disabilities Act of 1990 (42 USC 12131 et seq.), the Violence Against Women Act (32 USC 12291 et seq.), all regulations implementing these authorities; and other applicable Federal, State, and local fair housing and civil rights laws.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a signed certification by the appropriate state or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies, for the PHA's jurisdiction and a description of the way the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR 91.2, 91.225, 91.325, and 91.425).
- (7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. Seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR 5.151). The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity), will make no inquiries concerning the gender identification of sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.



OMB Approval No. 2577-0216 (exp. 08/31/2027)

- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.334 0 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35. ****Please see attached**
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), as applicable.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA and should be made available electronically, upon request.

District of Columbia Housing Authority

DC001

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. § 3729, 3802).

Keith L. Pettigrew

Executive Director

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

Must be signed by either the Chair or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chair or Secretary, documentation such as the by-laws or authorizing board resolutions must accompany this certification.

OMB Approval No. 2577-0216 (exp. 08/31/2027)

****(19) continued**

DCHA complies with the requirements of the *Lead Based Paint Poisoning Prevention Act* and 24 CFR part 35 wherever possible. DCHA is working to bring its entire portfolio into regulatory compliance and is in regular contact with HUD regarding DCHA's progress.

Notwithstanding the foregoing, HUD acknowledges that, while DCHA is not yet in full compliance with the *Lead Based Paint Poisoning Prevention Act* and 24 CFR part 35, HUD is regularly advised of DCHA's progress. HUD acknowledges further that, pursuant to the Lead Action Plan approved by HUD as of December 26, 2019, DCHA has completed Lead-Based Paint Testing and Risk Assessments of its entire public housing portfolio, providing appropriate notice to residents as these Risk Assessments are completed, and implemented appropriate interim controls as recommended by the Risk Assessments, within the time periods required by 24 CFR part 35 wherever possible. Due to the Covid-19 public health emergency, DCHA temporarily suspended interim control and abatement work required in residential units and interior common areas. DCHA continued to perform interim controls or abatement work on exterior building components throughout the public health emergency. DCHA then resumed interim control work in residential units and interior common areas as specified in the HUD approved Plan. Since 2024, the Plan has evolved and HUD has been informed that DCHA is updating its Plan.



Certification of Consistency with the Consolidated Plan

U.S. Department of Housing and Urban Development

OMB Number: 2501-0044
Expiration Date: 2/28/2027

Public Reporting Burden Statement: This collection of information is estimated to average 3 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 the requested information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R., 451 7th St SW, Room 8210, Washington, DC 20410-5000. Do not send completed forms to this address. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. This agency is authorized to collect this information under Section 102 of the Department of Housing and Urban Development Reform Act of 1989. The information you provide will enable HUD to carry out its responsibilities under this Act and ensure greater accountability and integrity in the provision of certain types of assistance administered by HUD. This information is required to obtain the benefit sought in the grant program. Failure to provide any required information may delay the processing of your application and may result in sanctions and penalties including of the administrative and civil money penalties specified under 24 CFR §4.38. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552). The information contained on the form is not retrieved by a personal identifier, therefore it does not meet the threshold for a Privacy Act Statement.

I/We, the undersigned, also certify under penalty of perjury that the information provided below is true, correct, and accurate. Warning: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties (18 U.S.C §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. § 3729, 3802; 24 CFR § 28.10(b)(1)(iii)).

I/We, the undersigned, certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan. (Complete the fields below.)

Applicant Name: District of Columbia Housing Authority

Project Name: PHA - Moving to Work Annual Plan FY2026

Location of the Project: 300 7th Street SW, 10th Floor Washington, DC 20024

Name of the Federal Program to which the applicant is applying:

N/A

Name of Certifying Jurisdiction: DC Department of Housing and Community Development (DHCD)

Certifying Official of the Jurisdiction

Name: Kelly Ann Morrow

Title: Housing Compliance Officer

Signature: *Kelly Ann Morrow*

Date: 07.10.2025

form HUD-2991

B. Documentation of Public Process

Under the terms of its MTW Agreement, DCHA must hold at least one public hearing per annual MTW Plan submission, and make the annual MTW Plan available for comment for at least 30-days. If any amendments are made to the MTW Plan, DCHA must hold a new public hearing and 30-day comment period. Additionally, DCHA must take into account public comments on its MTW program design, including comments from current tenants/participants.

Public Process for the Initial FY26 MTW Annual Plan – Submitted to HUD on July 15, 2025

DCHA has taken the following steps to ensure a thorough public process in accordance with the requirements as laid forth in the MTW Agreement.

- 30-Day Public Comment Period held from May 30, 2025 to June 28, 2025.
- Public Hearing conducted via Zoom on June 12, 2025.
 - 6 attendees from the public, 13 attendees from DCHA staff.
- Virtual briefing with City Wide Advisory Board via Microsoft Teams on June 18, 2025
 - 2 attendees from City Wide Advisory Board, 1 attendee from DCHA staff.
- Accessibility and Language Access
 - DCHA included information on its website and public notice flyers on requesting a reasonable accommodation or language access assistance.
- Public Notice Outreach:
 - DCHA:
 - May 30, 2025: Public Notice of availability of proposed FY26 MTW Annual Plan for 30-day public comment and notice of Public Hearing published on DCHA website.
 - May 30, 2025: Weekly social media posts on DCHA's LinkedIn, Facebook, X (formerly Twitter), and Instagram pages.
 - May 30, 2025: Weekly email and text alerts to residents regarding the 30-day public comment period and public hearing.
 - Week of June 2, 2025: Notice flyer posted at all DCHA-managed sites and Customer Service Centers.
 - Newspaper:
 - May 29, 2025: Public Notice published in *The Hill Rag* newspaper. Notice was available in print and online.
 - May 30, 2025: Public Notice published in *El Tiempo Latino* newspaper. Notice was available in print and online.
 - May 30, 2025: Public Notice published in *The Washington Post* newspaper. Notice was available in print and online.
 - June 3, 2025: Public Notice published in *The Washington Times* newspaper. Notice was available in print and online.
 - June 5, 2025: Public Notice published in *The Washington Informer* newspaper. Notice was available in print and online.
- Stakeholder Meetings:
 - April 2, 2025: Board of Commissioners briefing with Committee on Capital Projects
 - April 15, 2025: Briefing with Advocates Working Group
 - April 24, 2025: Board of Commissioners briefing with Committee on Resident Services
 - May 12, 2025: Virtual briefing with Resident Council Leadership via WebEx

- May 22, 2025: In-person briefing with Resident Council Leadership at Block-by-Block Initiative
- June 27, 2025: Board of Commissioners briefing with Committee on Operations and Administrative Services

Summary of Public Comments

DCHA received feedback and comments during the Public Hearing on June 12th and meeting with the City-Wide Advisory Board on June 18th. DCHA also received written comments during the public comment period from 4 members of the public. A summary of the comments and DCHA's responses to the comments are below.

PUBLIC COMMENT	DCHA RESPONSE
GENERAL COMMENTS	
Commenter states that the name "Moving to Work" can be confusing and perhaps DCHA could do more in its communications work to make it clear that the program is not related to mandatory work requirements.	<i>DCHA appreciates this feedback and is committed to continuing to find ways to improve its communications around the MTW program and its impact on DCHA residents.</i>
Commenter is supportive of giving Greenleaf Senior a senior preference and/or Designated Housing Plan. The commenter requests that a disability preference also be enacted and asks about the process for designating a senior preference and how tenants would be notified.	<i>DCHA acknowledges the suggestion provided by this comment. Should DCHA move forward with enactment of a Designated Housing Plan and/or senior preference, DCHA will engage in all required public consultation processes for that activity.</i>
Commenter asks how was the information about the hearing and the MTW Plan was communicated to residents and voucher holders. The commenter expresses concern that residents aren't getting the information.	<i>As documented in Section VI.B., DCHA took a number of steps to communicate information about the MTW Plan, public comment period, and public hearing to residents. This includes publishing on DCHA's website, weekly posts on DCHA's social media pages, weekly email and text alerts to residents, posting flyers in public housing communities and DCHA's Customer Service Centers, publishing a public notice in various local newspapers, as well as attending multiple resident council leadership meetings during the planning process. DCHA acknowledges the concern about residents receiving information and commits to being open to feedback and working collaboratively with residents and stakeholders to continually improve how information is shared. The agency will also continue to internally explore strategies to strengthen engagement.</i>
Commenter states that DCHA needs to communicate more about its MTW program and what it is doing for residents.	<i>DCHA appreciates the feedback provided and is committed to continuing to find ways to improve its communications around the MTW program and its impact on DCHA residents.</i>
Commenter encourages DCHA to explore the potential for initiatives that help households overcome the fear of losing assistance as a result	<i>DCHA currently offers several resident programs and services that encourage economic mobility, including the homeownership programs, the Apprenticeship Training</i>

of economic progress. The commenter recommends DCHA look at economic mobility activities at both MTW and non-MTW housing authorities to identify which activities may work with DC's existing partner organizational capacities and current market conditions.	<i>Program, the Credit Building Pilot program, and the employment and education pathways under the Family Self-Sufficiency Program (FSS). DCHA appreciates the feedback provided and is open to opportunities that would enhance our existing efforts and explore new economic and self-sufficiency activities that benefit residents.</i>
COMMENTS ON REDEVELOPMENT AND REPOSITIONING ACTIVITIES	
Commenter notes that Greenleaf Senior is included in the list of properties for repositioning and asks what the status of redevelopment for Greenleaf Senior is.	<i>DCHA is currently assessing the full portfolio to determine what level of investment is needed, including potentially substantial renovation or full redevelopment for each site. In the FY25 and now FY26 MTW Plan DCHA has included a list of all of its public housing properties as an administrative function because HUD requires properties with planned repositioning to be included in an annual plan before HUD will approve that repositioning. As noted in the Plan, the implementation of redevelopment plans for each site will involve significant resident engagement, DCHA Board of Commissioners involvement, and HUD approval. DCHA will be reaching out to residents of Greenleaf Senior with more details as they are available to share.</i>
Commenter notes that Triangle View is included in the list of properties for repositioning and asks what the status redevelopment for Triangle View is. The commenter also asks about the impact on residents and how will residents be notified.	<i>DCHA is currently assessing the full portfolio to determine what level of investment is needed, including potentially substantial renovation or full redevelopment for each site. In the FY25 and now FY26 MTW Plan DCHA has included a list of all of its public housing properties as an administrative function because HUD requires properties with planned repositioning to be included in an annual plan before HUD will approve that repositioning. As noted in the Plan, the implementation of subsidy repositioning for each site will involve significant resident engagement, DCHA Board of Commissioners involvement, and HUD approval. Triangle View is owned and managed by a third-party, not DCHA, and the property receives public housing operating subsidy. For a RAD subsidy conversion, DCHA and the owner would jointly work together to facilitate the process. DCHA and the owner would engage with residents to communicate the RAD conversion strategy in accordance with HUD requirements.</i>
Commenter asks about the status of New Communities Initiative (NCI) Funding and Lincoln Heights/Richardson Dwelling. Commenter notes that information has not been communicated to residents about the lack of funding under NCI. The commenter asks that DCHA host a meeting to update both Lincoln Heights and Richardson Dwelling residents about the status of redevelopment.	<i>As described in the FY26 MTW Plan, redevelopment funding for Lincoln Heights/Richardson Dwellings under the District's New Communities Initiative is no longer considered viable. NCI funds have not been allocated in the District's budget toward these properties in recent years. Given the ongoing needs, DCHA will be pursuing alternative financing opportunities to advance the redevelopment of Lincoln Heights/Richardson Dwellings. On July 2, 2025 DCHA publicly announced the launch of a revitalization plan to renovate and modernize 19 public housing communities. Phase One of the plan will include nine</i>

	<i>properties, including Lincoln Heights. As part of the revitalization plan, resident engagement sessions at each of the nine Phase 1 properties will be scheduled to begin in July 2025.</i>
Commenter expresses concern about the 50 planned new public housing units for Barry Farm Edmondson listed in the table under Section II.A.1. of the Plan. The commenter notes that these units would comprise of 0-1 and 2-bedroom units and that the small number of units in smaller bedroom sizes would make it difficult for residents to return to the property.	<i>DCHA acknowledges the concerns raised regarding the bedroom mix of Barry Farm Edmonson. Redevelopment at Barry Farm is slated to take place over multiple phases, with the entire redevelopment to be completed by 2030. The first building, The Asberry, was completed in October 2024. The second building, The Edmonson, is currently under construction and is scheduled to be completed in 2026. Barry Farm Rental Flats, the third building, will have a greater bedroom mix and is anticipated to close by the end of 2025. The property will consist of 90 units, over half of which will be 3-, 4-, and 5-bedroom units.</i>
Commenter asks for clarification of the language in the draft Plan under Section V.D. Rental Assistance Demonstration (RAD) Participation, which states that “DCHA plans to explore using RAD and RAD Blends to:3) stabilize mixed-income properties such as...”. The commenter states that this language is not clear and asks for further explanation, including the general role of DCHA in each of these properties.	<i>DCHA directly or indirectly owns number of mixed-income/mixed-finance properties that include public housing units. DCHA anticipates using RAD and RAD blends in the future as part of its stabilization, revitalization, and repositioning efforts, including the conversion of public housing units to project-based assistance. DCHA has reformatted this section to remove this confusing language and provide more clarity on the status of current DCHA RAD projects, including summary tables of all converted properties, properties with current CHAPs, properties undergoing conversion under Restore-Rebuilding (formerly Faircloth-to-RAD), and properties where DCHA has submitted a RAD Significant Amendment.</i>
Comment received regarding the redevelopment plans listed in the “Planned Public Housing Units to be Removed During the Fiscal Year” chart in Section II of the Plan. The commenter states their concern about the open-ended nature of DCHA’s repositioning effort and that for a large number of properties the MTW Plan does not include more specific timelines and details for repositioning. The commenter notes that DCHA has publicly previewed intentions to substantially renovate 19 properties in the agency’s portfolio beginning with an initial group of 9, but has not provided details on which properties in the MTW Plan.	<i>DCHA is currently assessing the full portfolio to determine what level of investment is needed, including potentially substantial renovation or full redevelopment for each site. In the FY25 and now FY26 MTW Plan DCHA has included a list of all of its public housing properties as an administrative function because HUD requires properties with planned repositioning to be included in an annual plan before HUD will approve that repositioning. As noted in the Plan, the implementation of redevelopment plans for each site will involve significant resident engagement, DCHA Board of Commissioners involvement, and HUD approval. DCHA will continue to provide updates in MTW Plans and Reports on its redevelopment and repositioning efforts in compliance with HUD requirements and as specific details are available. Additionally, on July 2, 2025, DCHA publicly announced the launch of a revitalization plan to renovate and modernize 19 public housing communities. DCHA will be using its MTW funding flexibility under the newly proposed MTW Initiative #36: Affordable Housing and Preservation Development Fund to support this revitalization plan. Phase One of the plan will include nine</i>

	<i>properties and resident engagement sessions at each of the nine Phase 1 properties will be scheduled to begin in July 2025. DCHA has updated its FY26 MTW Plan to include additional details regarding this revitalization plan under MTW Initiative #36: Affordable Housing and Preservation Development Fund and under the Planned Application of MTW Funds section.</i>
COMMENTS ON PROPOSED CHANGES TO DCHA'S PBV PROGRAM (MTW INITIATIVE #1)	
Commenter expresses support for proposed modifications to the PBV program under the FY26 MTW Plan, noting that the new policies would advance DCHA's MTW goals and reflect the realities of current affordable housing development.	<i>DCHA appreciates the feedback provided regarding these proposed changes.</i>
Commenter expresses concern about the proposed activity to waive the competitive process for allocations of new Project-Based Vouchers (PBVs) at properties owned directly or indirectly by DCHA. Commenter states that DCHA has had its fair share of scandal related to contracts being awarded with little oversight and that the activity seems problematic without strong oversight to ensure everything is done above board.	<i>DCHA acknowledges the concern raised about oversight and the allocation of PBVs. Although DCHA is proposing to waive the competitive process for allocation of PBVs at properties owned directly or indirectly by DCHA, this waiver does not reduce oversight or accountability. All PBV allocations and HAP contracts must still conform to HUD program rules and are reported in the MTW Annual Plan. Additionally, all PBV units, whether selected competitively or not, must meet rent reasonableness standards and pass Housing Quality Standards (HQS) inspections. All PBV allocations will also be subjected to Board approvals and other HUD assessments, such as subsidy layering reviews, if applicable.</i>
Two commenters express concern around the policy to waive the requirement under HOTMA to conduct impact analyses if the agency is project-basing more than 50% of its voucher allocated units, noting that, given DCHA's significant voucher waitlist and also ongoing changes in the city, there is a strong rationale for performing an impact analysis. One commenter noted that because DCHA is currently only allocating around 14% of its voucher authorization to PBVs, adopting this policy seems unnecessary and/or premature at this time.	<i>DCHA acknowledges the concern raised. This waiver is consistent with our existing, HUD-approved MTW waiver of the PBV cap under Initiative #1: Modifications to the Project-Based Voucher Program.</i>
Commenter expresses concern regarding the proposed PBV modification to waive third-party rent reasonableness, noting that there is a lack of clarity in the MTW Plan around what process DCHA will use instead.	<i>DCHA acknowledges the concern raised and has updated the language in the FY26 MTW Plan to provide more clarity. Specifically, that in lieu of contracting with a 3rd-party, DCHA will be conducting the rent-reasonableness determinations for PBV properties owned directly or indirectly by the agency. DCHA will use Affordablehousing.com to conduct PBV rent reasonableness determinations in-house, as the agency currently does for the HCV program.</i>

COMMENTS ON PROPOSED MTW INITIATIVE #35: VOUCHER SUCCESS FUND	
Commenter expresses support for the Voucher Success Fund and strongly encourages DCHA to implement the activity.	<i>DCHA appreciates the feedback provided by this comment.</i>
Commenter expresses support for this effort, especially the security deposits and application fee assistance. The commenter asks how voucher holders can connect with Housing Navigators? The commenter also raises concern regarding potential “landlord incentive fees” and questions their necessity given DC landlords are mandated to accept voucher holders under the local non-discrimination laws.	<i>DCHA appreciates the feedback provided by this comment and acknowledges the concern raised regarding DC’s local non-discrimination policy. DCHA will take that into consideration as it explores potential landlord incentive fees. Voucher participants can request Housing Navigator assistance through their assigned Housing Program Specialist. Housing Program Specialists serve as the main point of contact for voucher participants. To find more information about how to connect to a Housing Program Specialist, voucher participants can visit the DCHA website: https://www.dchousing.org/wordpress/vouchers/find-my-housing-specialist/</i>
COMMENTS ON PROPOSED MTW INITIATIVE #36: AFFORDABLE HOUSING AND PRESERVATION FUND	
Commenter encourages DCHA to continue listening to lenders, developers, and governmental partners about funding needs and gaps and incorporate lessons learned from its own redevelopment activities and partner’s experiences when establishing the activity.	<i>DCHA appreciates the feedback provided by this comment and is committed to working with valued partners in the agency’s redevelopment efforts.</i>
Commenter agrees with the need for more affordable housing in the District, but questions why the agency would use limited resources to create new affordable housing rather than rehab/preserve its existing public housing stock.	<i>DCHA appreciates the feedback regarding this activity. DCHA is fully committed to rehabilitating and preserving its existing public housing portfolio. DCHA will be using \$70 million in MTW funds under the Affordable Housing and Preservation Fund to help stabilize and modernize 19 of DCHA’s public housing properties. DCHA will also continue to work on the redevelopment of the remaining public housing properties, some of which is already underway, such as at Park Morton and Barry Farm.</i>
Commenter expresses their support the preservation and creation of affordable housing as a general principle, but also notes their concerns about the lack of specificity surrounding the establishment of the Affordable Housing and Preservation Development Fund under MTW Initiative #36. The commenter notes that nothing in the Plan explicitly limits or restricts the use of the Funds to preserve and develop public housing or housing targeted to the population DCHA is primarily intended to serve: extremely low-income residents, with income at 0-30% of the Area Median Income. The commenter expresses concern that DCHA may use the Fund to develop housing meant for residents at higher income brackets (including up to 80% AMI) and that this	<i>DCHA acknowledges the concern expressed regarding this activity. It is the purview of DCHA’s mission to provide quality affordable housing to extremely low-through moderate-income households in the District of Columbia. Currently, approximately 84% of families served through DCHA’s federal housing programs are extremely-low income, while approximately 96% are very-low income. A variety of public processes, including Board approvals, are required for all of our transactions, and we will continue to be transparent about uses of the Fund as well as other projects intended to preserve and create affordable housing for low-income families.</i>

will take away resources that should be reserved for low- and extremely low-income residents in the District. The commenter asks DCHA to clarify its intended use of the Fund and more explicitly restrict the Fund's use to serving low- and extremely low-income DC residents.	
COMMENTS ON PROPOSED MTW INITIATIVE #37: EXTENSION OF RAD RIGHTS TO SECTION 18 PROJECTS	
Commenter expresses support for this activity, but believes more can be done to enhance public trust and buy-in into this process. The commenter would like to see DCHA commit to greater consultation with local elected officials (including the D.C. Council and Advisory Neighborhood Commissions in the affected neighborhoods) before submission of a repositioning application to redevelop public housing. The commenter would also like DCHA to commit to making the rights included in MTW Initiative #37 effective as of the date that the property is included in an annual plan as a property that will be repositioned. The comment notes their concern about the large number of vacancies at current public housing properties and that because of vacancies and poor conditions, residents are being given vouchers to leave the property before the property's repositioning application has been approved and thus potentially losing out on the benefit of an absolute right of return. The commenter would like DCHA to clarify and commit to giving current residents a right of return, even if a resident chooses to leave the property temporarily to escape current bad conditions, in addition to the other protections proposed under MTW Initiative #37.	<i>DCHA acknowledges the suggestions provided and will provide more information on the implementation of this policy upon approval of the FY26 MTW Annual Plan from HUD.</i>
Commenter expresses their general support of this activity and notes that it is a step in the right direction following years of asking for a codified right of return for tenants in redevelopment properties. The commenter asks if the activity is approved by HUD, what would need to happen next? Additionally, the commenter expresses concern about the initiative being repealed in the future. The commenter asks for a clearer understanding of how the initiative would become a policy of DCHA, noting it would be helpful information for tenants.	<i>DCHA acknowledges the questions and concerns raised. Upon approval of the FY26 MTW Plan by HUD, the policies included are considered formally adopted DCHA policy. Once HUD approves the plan, DCHA is committed to engaging residents and ensuring that they are fully informed of the rights extended to them under this policy.</i>
Commenters asks question about the phased in rent increases and asks for more clarity. Does this	<i>Under the RAD program, one of the guaranteed resident rights is a phased-in-rent increase. If a tenant's monthly rent increases by more than the greater of 10% or \$25</i>

mean that the tenant's portion of the rent will be increasing above 30% of their income?	<i>purely as a result of conversion, the rent increase will be phased in over 5 years. Under this new MTW policy, DCHA will extend the same right to a phased-in rent increase to households who are impacted by the Section 18 program.</i>
Commenter commends DCHA for this activity and notes that DC's updated Comprehensive Plan aligns with DCHA's proposal to extend RAD resident rights to the Section 18 program. The commenter also expresses specific support for allowing the continuation of Family Self Sufficiency program participation after the conversion.	<i>DCHA appreciates the feedback provided by this comment.</i>
Two commenters expressed general support of the activity and its benefits to residents. Both commenters asked how DCHA will communicate information about this activity to residents.	<i>DCHA appreciates the feedback provided by this comment. Once HUD approves the plan, DCHA is committed to engaging residents and ensuring that they are fully informed of the rights extended to them under this policy.</i>

Public Process for the Amendment to the FY26 MTW Annual Plan – Submitted to HUD on 12/12/2025

DCHA has taken the following steps to ensure a thorough public process in accordance with the requirements as laid forth in the MTW Agreement.

- 30-Day Public Comment Period held from July 30, 2025 to August 28, 2025.
- Public Hearing conducted via Zoom on August 20, 2025.
 - 30 attendees from the public, 9 attendees from DCHA staff.
- Virtual briefing was scheduled with City-Wide Advisory Board via Microsoft Teams on June 18, 2025
 - 2 members of the City-Wide Advisory Board and 3 staff members from DCHA attended.
- Accessibility and Language Access
 - DCHA included information on its website and public notice flyers on requesting a reasonable accommodation or language access assistance.
- Public Notice Outreach:
 - DCHA:
 - July 30, 2025: Public Notice of availability of Amended FY26 MTW Annual Plan for 30-day public comment and notice of Public Hearing published on DCHA website.
 - July 30, 2025: Weekly social media posts on DCHA's LinkedIn, Facebook, X (formerly Twitter), and Instagram pages.
 - July 30, 2025: Weekly email and text alerts to residents regarding the 30-day public comment period and public hearing.
 - Week of July 30, 2025: Notice flyer posted at all DCHA-managed sites and Customer Service Centers.
 - Newspaper:
 - July 30, 2025: Public Notice published in *The Washington Post* newspaper. Notice was available in print and online.

- July 31, 2025: Public Notice published in *The Washington Times* newspaper. Notice was available in print and online.
- July 31, 2025: Public Notice published in *The Washington Informer* newspaper. Notice was available in print and online.
- July 31, 2025: Public Notice published in *The Hill Rag* newspaper. Notice was available in print and online.
- August 1, 2025: Public Notice published in *El Tiempo Latino* newspaper. Notice was available in print and online
- August 2, 2025: Public Notice published in *Afro American* newspaper. Notice was available in print.
- Stakeholder Meetings:
 - August 29, 2025: Board of Commissioners briefing with Committee on Operations and Administrative Services

Summary of Public Comments

DCHA received feedback and comments during the Public Hearing on August 20, 2025. DCHA received written comments regarding the Amended MTW Plan during the public comment period from 4 members of the public.

DCHA also received a number of questions during the public hearing and via written inquiry during the public comment period from individuals and DCHA residents who were looking for updates on their specific housing situations. Those questions and inquiries were compiled and forwarded to the appropriate departments for follow-up.

A summary of the comments and DCHA's responses to the comments are below.

PUBLIC COMMENT	DCHA RESPONSE
GENERAL COMMENTS	
Commenter states that DCHA must ensure that site-based waiting lists for public housing are properly managed and have clear policies and procedures that are transparent to applicants and potential applicants. Additionally, DCHA should implement oversight measures to ensure that privately managed properties are adhering to their stated policies and procedures, as well as federal and local laws, rules, and regulations.	<i>DCHA acknowledges the suggestions provided on this activity and is committed to providing transparency and proper oversight in the management of site-based waiting lists in adherence with applicable federal and local laws, rules, and regulations. As the implementation of public housing site-based waiting lists moves forward, DCHA will share information as it becomes available.</i>
Commenter encourages DCHA to consider implementing a homeless preference as D.C. continues to have a rise in homelessness and the need for shelter is increasing.	<i>DCHA appreciates the feedback provided by this comment and is currently exploring options for a homeless preference in the public housing and housing choice voucher programs.</i>
Commenters wants to ensure that there is transparency for residents of Lincoln Heights and other properties converting under the RAD process, including that residents will receive	<i>DCHA is committed to robust resident engagement throughout the redevelopment process and will ensure that residents are provided with timely information and notices in accordance with all applicable RAD requirements,</i>

subsidy under the project-based voucher program and that policy changes will be reflected in the Admin Plan, not the ACOP.	<i>including regarding any programmatic changes that impact tenants and will occur as a result of conversion from public housing to the project-based voucher program.</i> <i>In July and August of 2025, DCHA held a series of initial resident meetings at the nine Phase 1 properties during which information regarding the change in subsidy/program was shared with residents. DCHA will continue to hold additional meetings at each site as the redevelopment process moves forward and will provide information regarding those meetings with residents as it is available to share.</i>
Commenter asks what the pet policy for RAD properties is.	<i>Under current RAD regulations (PIH 2025-03 (HA)) residents are permitted to keep any pets in-place at the time of conversion.</i>
Commenter notes that the RAD Significant Amendments in the MTW Plan say they will follow PIH 2019-32 to convert units from public housing to project-based vouchers, but their searches have not yielded any results for a PIH 2019-32.	<i>DCHA has updated the RAD Significant Amendments to reflect the correct citation of notice PIH 2019-23.</i>
Commenter notes that the RAD Amendments states that tenants who do not pay rent will receive a 14-day notice of termination of their subsidy, but that under current law, there should be a 30-day notice of termination.	<i>DCHA has updated the RAD Significant Amendments to reflect the new RAD supplemental guidance (PIH 2025-03 HA) that was released by HUD earlier this year, which extends the 14-day notice of termination time period to 30-days.</i>
Commenter asks for more clarity around the guiding policies and timeline for relocation for properties converting under RAD.	<i>DCHA appreciates this feedback. As noted in the Plan, the implementation of redevelopment plans for each site will involve significant resident engagement.</i> <i>While DCHA cannot currently provide exact timelines for each property, we understand that residents whose properties will be impacted by the bond revitalization plan are eager for updates. DCHA has a team of staff dedicated specifically to relocation planning and should any relocation be required as part of the redevelopment effort, DCHA will ensure that residents are provided with timely information and notices in accordance with all applicable RAD requirements, including those outlined in the RAD Relocation Notice (PIH Notice 2016-17, REV 1 or any successor), the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (URA) and related HUD guidance. Additionally, all residents occupying a unit at the time of the RAD conversion will have a right to return in accordance with the RAD requirements and have all eligible relocation expenses covered.</i> <i>For additional helpful information on resident rights, general conversion timelines, and relocation requirements, HUD has provided a series of RAD Resident Fact Sheets as a resource. Those fact sheets can be found here:</i>

	https://www.hud.gov/hud-partners/rad-resident-fact-sheets
Commenter asks for clarity around the language in the RAD Amendments that state DCHA may offer tenant relocation to “another assisted unit and thereby waive their right to return to the development after rehabilitation or construction is finished”. Commenter asks what other assisted units or properties DCHA plans to offer.	<i>Under RAD regulations, a resident may elect to voluntarily waive their right to return to a property and instead consent to permanent relocation to an alternative housing option.</i> <i>Alternative housing options that DCHA could offer include transfers to other public housing properties, housing choice vouchers (subject to HCV program requirements), homeownership programs, or other affordable housing options as identified by DCHA. A specific list of available units cannot be provided in advance because unit availability is dependent on the timing of the relocation and the particular needs and preferences of the resident/household. Any alternative housing option must include, at a minimum, all eligible relocation assistance and payments and DCHA must ensure that the resident’s decisions are fully informed, voluntary, and carefully documented.</i> <i>If any resident elects to permanently relocate to an alternative housing option, DCHA will work directly with the resident to identify appropriate housing options in accordance with all applicable RAD requirements, including those outlined in the RAD Fair Housing, Civil Rights, and Relocation notice (PIH 2016-17 (HA) or any successor).</i>
Commenter asks for more clarity around phased-in-rent increases for tenants whose properties have converted under RAD and the circumstances under which rent may increase. Under RAD, the policy is that if a tenant’s monthly rent increases by more than the greater of 10% or \$25 purely as a result of conversion, the rent increase will be phased in over 5 years. Commenter also asks for clarification on DCHA’s proposed MTW activity that would extend RAD Resident Rights to Section 18 conversions, specifically the phased-in-rent increases. Commenter asks if the new policy contradicts the definition of affordable housing if tenant rents would be subject to increases above 30%.	<i>DCHA appreciates this question and the opportunity to respond. Under the public housing program, households can opt into paying a “flat rent”, which is a fixed amount based on the market value of the unit, rather than an income-based rent, which is no more than 30% of adjusted income. When a household transitions to the Project-Based Voucher (PBV) program under RAD, they will no longer pay a flat rent (which is not an option in the voucher program), but instead their rent portion will be calculated based on 30% of their adjusted income. For households with higher incomes, this can result in a rent amount that is higher than the flat rent they were previously paying, but the household’s rent portion will still be capped at 30% of adjusted income. If a household transitions from flat-rent to income-based rent as part of the conversion under RAD and there is an increase in rent, the RAD regulations guarantee that the rent increase is phased-in over 5 years to help residents adjust to the new rent structure.</i>
COMMENTS ON THE PBV PROGRAM	
Commenter expresses concern about the proposed changes to MTW Initiative #1: Modifications to the Project-Based Voucher	<i>DCHA appreciates the feedback provided. As noted in the MTW Plan, all units must meet housing quality standards before they are added to a HAP contract, ensuring that</i>

program. Commenter states that HAP contracts should not be signed for units that are still under construction. Commenter also expressed concern about project-based vouchers more generally, stating that converting public housing to project-based vouchers causes families to lose mobility.	<i>households are only placed into safe, habitable units. Additionally, HAP payments will not be made for specific units while they are undergoing rehabilitation work.</i> <i>DCHA also appreciates the concerns expressed about mobility and housing choice. DCHA is committed to ensuring families have meaningful options for safe, stable, and affordable housing in all areas of the city.</i>
Comment expresses concern about delays in the relocation process, stating that prolonged rent reasonableness reviews and administrative bottlenecks frustrate both tenant and landlords, thereby reducing housing opportunities for voucher holders.	<i>DCHA appreciates the feedback provided by this comment. Once DCHA receives a completed request for tenancy approval (RFTA) packet, it is processed promptly. However, delays may occur for several reasons, including when a landlord does not provide correct or updated information, or if the unit inspection does not meet housing quality standards. DCHA agrees that administrative delays and bottlenecks that cause extended relocation timelines are not in the best interest of residents, landlords, or the agency, and can result in hardships and frustrations that discourage participation in the voucher program. DCHA is committed to continuous improvement and is actively reviewing procedures with staff to identify opportunities to streamline processes and minimize unnecessary delays. These comments have been shared with the appropriate department to inform ongoing process improvements for the voucher program.</i>

C. Planned and Ongoing Evaluations

DCHA has no current planned or ongoing evaluations.



D. Lobbying Disclosures

Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Report Management Officer, Office of Policy Development and Research, RFE, Department of Housing and Urban Development, 451 7th St SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0157.

Applicant Name

District of Columbia Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Program Block Grant - FY2026 MTW Annual Plan

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

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

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Keith L. Pettigrew

Title

Executive Director

Signature

Date (mm/dd/yyyy)

7/9/25

Previous edition is obsolete

form HUD 50071 (01/14)



DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: ☐ a. contract ☐ b. grant ☐ c. cooperative agreement ☐ d. loan ☐ e. loan guarantee ☐ f. loan insurance		2. Status of Federal Action: ☐ a. bid/offer/application ☐ b. initial award ☐ c. post-award		3. Report Type: ☐ a. initial filing ☐ b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: ☒ Prime ☐ Subawardee Tier _____, if known: District of Columbia Housing Authority 300 7th Street SW, 10th Floor Washington, DC 20024 Congressional District, if known: N/A			5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: N/A Congressional District, if known:		
6. Federal Department/Agency: U.S. Department of Housing and Urban Development			7. Federal Program Name/Description: Moving to Work Annual Plan FY2025 CFDA Number, if applicable: _____		
8. Federal Action Number, if known: N/A			9. Award Amount, if known: \$ N/A		
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): N/A			b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): N/A		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: Print Name: Keith L. Pettigrew Title: Executive Director Telephone No.: 202-535-1000 Date: 7/9/25		
Federal Use Only:			Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)		

Appendix A. Local Asset Management Program

Background and Introduction

The Amended and Restated Moving to Work Agreement, effective September 29, 2010, required DCHA to design and implement a local asset management program for its Public Housing Program and describe such program in its Annual MTW Plan. The term “Public Housing Program” means the operation of properties owned or subsidized by the Agency that are required by the U.S. Housing Act of 1937 to be subject to a Public Housing declaration of trust in favor of HUD. The Agency’s local asset management program shall include a description of how it has implementing project-based property management, budgeting, accounting, and financial management and any deviations from HUD’s asset management requirements. Under the First Amendment to the MTW Agreement, DCHA agreed to describe its cost accounting plan (cost allocation plan) as part of its local asset management program including how it deviates from the HUD fee for service system.

Project-based approach for Public Housing Program

DCHA maintains a project-based management approach which includes both DCHA-managed properties, as well as privately managed properties, under the Public Housing Program. Project-level budgeting and accounting is maintained for each of these Public Housing properties. In addition, each mixed-income, mixed-finance rental community that contains Agency-assisted units under the Public Housing Program are owned, managed and operated by third party partnerships as established at the time each of the transactions were structured. DCHA maintains a separate budget and accounting for the operating subsidy paid to the owners of these properties as well as any other cost incurred by the Agency on behalf of these properties.

COST ALLOCATION PLAN

Identification of Cost Allocation Approach

DCHA approached its cost allocation plan with consideration to the entire operation of the Agency, rather than a strict focus on only the MTW Program. This cost allocation plan addresses the larger DCHA operation as well as the specific information required related to the MTW Program.

Under the MTW Agreement, the cost accounting options available to the Agency include either a “fee-for-service” methodology or an “indirect cost rate” methodology. DCHA can establish multiple cost objectives or a single cost objective for its MTW Program. DCHA opted to use a fee-for-service methodology and to establish the MTW Program as a single cost objective, as further described below.

Classification of Costs

There is no universal rule for classifying certain costs as either direct or indirect. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, the definitions and guidelines provided in this Cost Allocation Plan are used for determining direct and indirect costs charged to the cost objectives.

Definitions

Cost Objective – Cost objective is a function, organizational subdivision, contract, grant, or other activity for which cost data are needed and for which costs are incurred.

Direct Costs – Direct costs are those that can be identified specifically with a particular final cost objective.

Indirect Costs – Indirect costs are those: (a) incurred for a common or joint purpose benefitting more than one cost objective, and (b) not readily assignable to the cost objective(s) specifically benefitted, without effort disproportionate to the results achieved. After direct costs have been determined and assigned directly to Federal awards and other activities as appropriate, indirect costs are those remaining to be allocated to the cost objectives.

Cost Base – A cost base is the accumulated direct costs (normally either total direct salaries and wages or total direct costs exclusive of any extraordinary or distorting expenditures) used to distribute indirect costs to cost objectives (Federal awards). Generally, the direct cost base selected should result in each award bearing a fair share of the indirect costs in reasonable relation to the benefits received from the costs.

DCHA Cost Objectives

DCHA has identified the following cost objectives:

- **MTW Program** – All associated activities funded under the MTW Single Fund authority are deemed as a **single cost objective**. The MTW Program cost objective includes: 1) DCHA-owned Public Housing Properties and Public Housing units contained in third party-owned properties, 2) MTW Housing Choice Vouchers, both Project-Based Vouchers (PBV) and Tenant-Based Vouchers, 3) Development Activity funded from MTW, 4) resident services and case management services offered to families served under the MTW program, 5) Capital Funds, and 6) any other activity that is permitted in DCHA's Amended and Restated MTW Agreement.
- **Revitalization Program** – The Revitalization Program includes the development-related activity funded from HOPE VI, Choice Neighborhood Initiatives and other local funds. Generally, DCHA will capture costs by development and will include the ability to track charges to specific funding sources.
- **Special Purpose (Non-MTW) Tenant-Based and Project-Based Housing Choice Vouchers** – Special Purpose Vouchers include, but are not limited to, the Section 8 Moderate Rehab Program, the Veterans Affairs Supportive Housing (VASH) vouchers, Tenant Protection and Opt-Out Vouchers in the first year, and the Multicultural vouchers.
- **Other Federal and State Awards** – DCHA may be the recipient of other Federal and Local awards from time to time. Each of these awards will be a separate cost objective as necessary. For example, DCHA has six locally funded voucher programs that are treated as separate programs and therefore, as separate cost objectives.

DCHA Direct Costs

DCHA direct costs are defined in conjunction with the cost objectives defined in this Cost Allocation Plan. As previously mentioned, under 2 CFR 200, there is no universal rule for classifying costs as either direct or indirect. A cost may be direct with respect to some specific service or function, but indirect with respect to the final cost objective.

MTW Program direct costs include, but are not limited to:

1. All contract costs readily identifiable with delivering housing assistance to low-income families under the MTW Program;
2. Housing Assistance Payments (including utility allowances) for tenant-based vouchers and PBV;
3. Portability Administrative Fees;
4. Homeownership voucher funding;
5. Foreclosure and emergency assistance for low-income families served under HCV;

6. HCV costs for administering tenant-based vouchers, including inspection activities;
7. Operating costs directly attributable to operating DCHA-owned Public Housing properties, including utility costs and maintenance costs administered centrally;
8. Capital improvement costs at DCHA owned properties;
9. Operating subsidies paid to MIMF properties
10. Operating costs paid related to or on behalf of third party owned properties with Public Housing units including utility charges;
11. The Asset Management Department costs attributable to PBV, DCHA-owned Public Housing properties and third party-owned Public Housing units;
12. Resident Services directly attributable to MTW Program activities;
13. Gap financing in MTW real estate transactions;
14. Acquisition costs funded from MTW funds
15. Demolition, relocation and leasing incentive fees in repositioning DCHA-owned real estate;
16. Homeownership activities for low-income families;
17. Office of Capital Programs and Development costs associated with MTW-funded development activity, homeownership initiatives, and PBRA as a development tool, and
18. Any other activities associated with delivering housing assistance to low-income families under the MTW Program.

Revitalization Program direct costs include, but are not limited to:

1. Construction costs;
2. Loan and financing for affordable units;
3. Acquisition costs;
4. Land Improvements;
5. Legal expenses;
6. Professional services;
7. Contract cost (case management);
8. Relocation;
9. Extraordinary site work;
10. Demolition; and
11. Other revitalization expenditures (such as homeownership mortgage assistance and down payment assistance).

Special Purpose Housing Choice Tenant-based Vouchers direct costs include, but are not limited to:

1. Housing Assistance Payments (HAP) and
2. Program Administration Costs.

Other Federal and State Awards direct cost include, but are not limited to:

1. Legal expenses;
2. Professional services;
3. Utilities (gas, water, electric, other utilities expense);
4. Real estate taxes;
5. Insurance;
6. Bank charges;
7. Staff training;
8. Interest expense;
9. Contract cost for CDBG; and

10. Any cost identified for which the award is made. Such costs will be determined as DCHA receives awards.

Explanation of Differences

DCHA has the ability to define direct costs differently than the standard definitions published in HUD's Financial Management Guidebook pertaining to the implementation of 24 CFR Part 990.

DCHA is required to describe any differences between the Agency's Local Asset Management Program and HUD's asset management requirements in its Annual MTW Plan in order to facilitate the recording of actual property costs and submission of such cost information to HUD:

1. DCHA determined to implement a cost allocation system that was more comprehensive than HUD's Asset Management System which advocated a fee-for-service approach specific to the properties in the Public Housing Program. HUD's system was limited in focusing only a fee-for-service system at the property level and failed to address DCHA's comprehensive operation which includes other programs and business activities. DCHA's MTW Program is much broader than Public Housing properties and includes activities not found in traditional HUD Programs. This Cost Allocation Plan addressed the entire DCHA operation.
2. DCHA defined its cost objectives at a different level than HUD's System. Specifically, DCHA defined the MTW Program as a cost objective which is consistent with the issuance of the CFDA number for MTW as a Federal program. HUD defined its cost objective at the property level which fails to recognize the overall effort required to deliver the housing resources to Low Income families under the MTW Program. Because the cost objectives are defined differently, direct and indirect costs are defined based on the cost objectives identified in this Cost Allocation Plan.
3. DCHA will use a simple fee system of charging up to 10% of MTW Program funds to cover the costs of the Central Office Cost Center (COCC). DCHA views the up to 10% fee as reasonable when compared to the fees earned for administering the Local Voucher Programs. DCHA will account for an allocable share of the "MTW Fee" charges at the property level based upon the size of the property.
4. DCHA will charge a fee to other Federal and Local awards in a manner that is consistent with that allowed for those awards. The fee charged to the Revitalization program will continue to follow the HUD guidelines of 3% of the total cost of the development.

Appendix B. Units Occupied by Police Officers

DCHA provides apartments to police officers to enhance security, foster a greater understanding between DCHA residents and the police, and provide role models for the youth residing in that development. Additionally, offering temporary housing in vacant units to newly recruited Public Safety Officers who are moving to the area provides an important recruitment tool in a competitive housing market.

As conditions of their leases, resident police officers must be active police officers with full police authority, the public housing unit must be their principal residence, and they must abide by all rules and regulations applicable to residents of the property. In addition, resident police officers contribute to the property's security by attending and participating in Resident Council meetings, assisting with citizen neighborhood watch patrol programs, taking appropriate action if and when they become aware of criminal or unlawful activity occurring on the property, meeting biweekly with the DCHA Office of Public Safety, parking the police cruiser on the property, wearing their departmental uniform as often as possible, and ticketing any vehicle unlawfully parked on the property.

Please see the table below for the unit-level details of the units occupied by police officers.

Property	Units Occupied by Police Officers
Columbia Rd.	1
Garfield Terrace	2
Harvard Towers	1
Judiciary House	1
Kentucky Court	1
Lincoln Heights	1
Montana Terrace	2
Ontario Road	1
Regency House	1
Richardson Dwellings	1
Elvans Court	1
Kelly Miller/LeDroit	0
Lincoln Heights	0
Lincoln Road	0
Sibley Plaza	0
Total	13

Appendix C: Summary of Admissions and Continued Occupancy Policy (ACOP) and Administrative Plan Updates

DCHA is currently in the process of updating its Admissions and Continued Occupancy Plan (“ACOP”) and Administrative Plan (“Admin Plan”) and plans to adopt significantly updated versions of both documents in FY2025. In April 2025, DCHA held a public comment period and hearing for proposed changes to the ACOP, and subsequently extended the public comment period through July 1, 2025. DCHA also plans to hold a public comment period and hearing in early summer 2025 for the Admin Plan.

As outlined in DCHA’s 3-Year Recovery Plan, policy alignment across the MTW Plan, ACOP, and Admin Plan is a top priority for the agency.

DCHA has submitted the public comment version of the ACOP to the HUD field office, and will provide further information on the ACOP and Admin Plan updates in the FY2025 MTW Annual Report.

Appendix D. RAD Significant Amendment for Barry Farm Rental Flats

The District of Columbia Housing Authority (DCHA) seeks to provide new units at Barry Farm Rental Flats through the Rental Assistance Demonstration (RAD) using Restore-Rebuild. As a result, the DCHA will be converting 42 public housing units at Barry Farm Rental Flats to Project Based Vouchers under the guidelines of PIH Notice 2019-23 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 2019-23; and PIH Notice 2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. DCHA is not presently under a Voluntary Compliance Agreement or other agreement that will be adversely impacted by the RAD conversion and confirms it will comply with all applicable fair housing and civil rights requirements. The agency's compliance with applicable fair housing and civil rights requirements will not be negatively impacted by conversion activities. Further, the conversion will comply with all applicable site selection and neighborhood reviews.

HUD crafted the RAD program as a response to fill the growing gap between decreasing federal funding and increasing capital needs of public housing units and is an important tool for achieving DCHA's Transformation Plan. The program allows DCHA to utilize non-federal funding opportunities to advance major renovations and stabilize properties for long-term viability so that DCHA can achieve its goal of providing healthy and sustainability communities for our resident populations.

RAD requirements include important resident protections and rights such as: guaranteed right to return to the property without rescreening, no change to residents' rent formula (remains at 30% of adjusted income), full relocation assistance during the construction phase, and continued funding of the Resident Councils after conversion.

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

Name of Public Housing Development	PIC Development ID	Conversion Type (i.e., PBV or PBRA)	Transfer of Assistance
Barry Farm Rental Flats	DC001005542	PBV	N/A
Total Units	Pre-RAD Unit Type (i.e., Family, Senior, etc.)	Post-RAD Unit Type if Different (i.e., Family, Senior, etc.)	Capital Fund Allocation of Development
42	N/A	Family	N/A
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
One Bedroom	0	0	N/A
Two Bedroom	0	15	N/A

Three Bedroom	0	10	N/A
Four Bedroom	0	13	N/A
Five Bedroom	0	4	N/A

Residents Rights, Participation, Waiting List and Grievance Procedures

Section 1.6 Special Provisions Affecting Conversions to Project Based Vouchers from PIH Notice 2012- 32, REV-3

The HUD RAD Notice (PIH-2012-32 (HA) H-2017-03, REV-3 and successor notices) and existing project based voucher policies outlined in the DCHA Administrative Plan and Admissions and Continued Occupancy Policy apply at the time of the conversion of Barry Farm Rental Flats. DCHA has published RAD regulations amending the Administrative Plan and they are in effect.

PBV 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 DCHA 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 RAD, DCHA or the owner must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision will 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 5 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. 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. All units converted under RAD will follow the five-year phase-in outlined below. 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.

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 and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: 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.

As an MTW agency, DCHA has converted all of its households to biennial or triennial recertification cycles. For purposes of implementing the 5-year phase-in, impacted households will convert to an annual recertification until the calculated income-based TTP is reached. Once these households are on income-based TTP, the households will convert back to biennial or triennial recertification.

5. Public Housing Family Self Sufficiency (PH 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.

DCHA is allowed 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, DCHA will follow the normal closeout procedures outlined in the grant agreement. If DCHA continues to run an FSS program that serves PH and/or HCV participants, DCHA 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.

DCHA will administer the agency’s 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 78100.1 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.

If DCHA becomes a ROSS-SC grantees prior to RAD conversion of a site, DCHA will be able to finish out 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.

6. Resident Participation and Funding. In accordance with HUD RAD provision, residents of RAD properties 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 in accordance with current DCHA policies and HUD regulations.

7. Resident Procedural Rights. The following items will be incorporated into both the DCHA Administrative Plan and the owner's lease, which including the required tenancy addendum, as appropriate.

a. Termination Notification. As required under RAD, DCHA's termination process will provide adequate written notice of termination of the lease as outlined below:

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. 30 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

For issues related to tenancy and termination of assistance, DCHA will provide an opportunity for an informal hearing, as outlined in 24 CFR § 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 will be given to residents for any dispute that a resident may have with respect to the owner's action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.

- 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 owner will perform the hearing.

ii. An informal hearing will not be required for class grievances or for disputes between residents not involving the 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 owner or contract administrator.

- iii. The owner will 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 owner will provide opportunity for an informal hearing before an eviction. The DCHA Administrative Plan will include RAD hearing procedures.

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 HCV 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 apply 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 due to loss of employment) is covered by this waiver.

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 365 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 RAD property after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. In such 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. DCHA will 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 will 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, DCHA will remove a unit from the contract when no assistance has been paid for 365 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, DCHA will reinstate the unit after the family has vacated the property. If the project is partially assisted,

the DCHA 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 RAD property. When an appropriate sized unit becomes available in the RAD property, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the RAD property, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** DCHA and the Project Owner will cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.
2. **Additional Monitoring Requirement.** DCHA’s Board must approve the operating budget for the RAD property annually in accordance with HUD requirements.
3. **Establishment of Waiting List.** DCHA shall utilize the site-based waiting list(s) that exist at the time of conversion. For any applicants on the public housing waiting list that are likely to be ineligible for admission at a RAD property converting to PBV because the household’s TTP is likely to exceed the RAD gross rent, the DCHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the DCHA’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.

For RAD properties where transfer of assistance will be utilized, DCHA will notify existing waiting list applicants on how to apply they can apply for any new properties with site-based waiting lists.

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

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

6. **Administrative Fees for Public Housing Conversions.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds.

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

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

Site Selection and Neighborhood Standards Review

DCHA certifies that the conversion of Barry Farm Rental Flats to the RAD program complies with the site selection requirements for existing or rehabilitated housing set forth at 24 CFR § 983.57 (PBV), the Fair Housing Act, Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

Relocation Plan

Not applicable, this is a new property.

Significant Amendment Definition

As part of RAD, DCHA is redefining the definition of a substantial deviation from the MTW plan to exclude the following RAD-specific items:

- a. 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;
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD Conversion.

Appendix E. RAD Significant Amendment for Park Morton Phase 2

The District of Columbia Housing Authority (DCHA) seeks to provide new units at Park Morton Phase 2 through the Rental Assistance Demonstration (RAD) using Restore-Rebuild (formerly Faircloth-to-RAD). As a result, the DCHA will be converting 17 public housing units at Park Morton Phase 2 to Project Based Vouchers under the guidelines of PIH Notice 2019-23 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 2019-23; and PIH Notice 2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. DCHA is not presently under a Voluntary Compliance Agreement or other agreement that will be adversely impacted by the RAD conversion and confirms it will comply with all applicable fair housing and civil rights requirements. The agency's compliance with applicable fair housing and civil rights requirements will not be negatively impacted by conversion activities. Further, the conversion will comply with all applicable site selection and neighborhood reviews.

HUD crafted the RAD program as a response to fill the growing gap between decreasing federal funding and increasing capital needs of public housing units and is an important tool for achieving DCHA's Transformation Plan. The program allows DCHA to utilize non-federal funding opportunities to advance major renovations and stabilize properties for long-term viability so that DCHA can achieve its goal of providing healthy and sustainability communities for our resident populations.

RAD requirements include important resident protections and rights such as: guaranteed right to return to the property without rescreening, no change to residents' rent formula (remains at 30% of adjusted income), full relocation assistance during the construction phase, and continued funding of the Resident Councils after conversion.

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

Name of Public Housing Development	PIC Development ID	Conversion Type (i.e., PBV or PBRA)	Transfer of Assistance
Park Morton Phase 2	DC001005501	PBV	N/A
Total Units	Pre-RAD Unit Type (i.e., Family, Senior, etc.)	Post-RAD Unit Type if Different (i.e., Family, Senior, etc.)	Capital Fund Allocation of Development
17	N/A	Family	N/A
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
One Bedroom	0	0	N/A
Two Bedroom	0	6	N/A

Three Bedroom	0	9	N/A
Four Bedroom	0	2	N/A
Five Bedroom	0	0	N/A

Residents Rights, Participation, Waiting List and Grievance Procedures

Section 1.6 Special Provisions Affecting Conversions to Project Based Vouchers from PIH Notice 2012- 32, REV-3

The HUD RAD Notice (PIH-2012-32 (HA) H-2017-03, REV-3 and successor notices) and existing project based voucher policies outlined in the DCHA Administrative Plan and Admissions and Continued Occupancy Policy apply at the time of the conversion of Park Morton Phase 2. DCHA has published RAD regulations amending the Administrative Plan and they are in effect.

PBV 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 DCHA 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 RAD, DCHA or the owner must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision will 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 5 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. 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. All units converted under RAD will follow the five-year phase-in outlined below. 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.

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 and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: 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.

As an MTW agency, DCHA has converted all of its households into biennial or triennial recertification cycles. For purposes of implementing the 5-year phase-in, impacted households will convert to an annual recertification until the calculated income-based TTP is reached. Once these households are on income-based TTP, the households will convert back to biennial or triennial recertification.

5. Public Housing Family Self Sufficiency (PH 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.

DCHA is allowed 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, DCHA will follow the normal closeout procedures outlined in the grant agreement. If DCHA continues to run an FSS program that serves PH and/or HCV participants, DCHA 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.

DCHA will administer the agency's 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 78100.1 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.

If DCHA becomes a ROSS-SC grantees prior to RAD conversion of a site, DCHA will be able to finish out 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.

6. Resident Participation and Funding. In accordance with HUD RAD provision, residents of RAD properties 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 in accordance with current DCHA policies and HUD regulations.

7. Resident Procedural Rights. The following items will be incorporated into both the DCHA Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate.

a. Termination Notification. As required under RAD, DCHA's termination process will provide adequate written notice of termination of the lease as outlined below:

- 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. 30 days in the case of nonpayment of rent; and
- iii. 30 days in any other case, except if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. Grievance Process

For issues related to tenancy and termination of assistance, DCHA will provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:

- ii. 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 will be given to residents for any dispute that a resident may have with respect to the owner's action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - 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 owner will perform the hearing.
- iii. An informal hearing will not be required for class grievances or for disputes between residents not involving the 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 owner or contract administrator.

- iv. The owner will 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).
- v. The owner will provide an opportunity for an informal hearing before an eviction. The DCHA Administrative Plan will include RAD hearing procedures.

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 HCV 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 apply 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 due to loss of employment) is covered by this waiver.

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 365 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 RAD property after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. In such 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 residents. 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. DCHA will 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 will 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, DCHA will remove a unit from the contract when no assistance has been paid for 365 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, DCHA will reinstate the unit after the family has vacated the property. If the project is partially assisted,

the DCHA 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 RAD property. When an appropriate sized unit becomes available in the RAD property, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the RAD property, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** DCHA and the Project Owner will cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.
2. **Additional Monitoring Requirement.** DCHA’s Board must approve the operating budget for the RAD property annually in accordance with HUD requirements.
3. **Establishment of Waiting List.** DCHA shall utilize the site-based waiting list(s) that exist at the time of conversion. For any applicants on the public housing waiting list that are likely to be ineligible for admission at a RAD property converting to PBV because the household’s TTP is likely to exceed the RAD gross rent, the DCHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the DCHA’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.

For RAD properties where transfer of assistance will be utilized, DCHA will notify existing waiting list applicants on how to apply they can apply for any new properties with site-based waiting lists.

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

4. **Mandatory Insurance Coverage.** The RAD property shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
5. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC.
6. **Administrative Fees for Public Housing Conversions.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds.

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

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

Site Selection and Neighborhood Standards Review

DCHA certifies that the conversion of Park Morton Phase 2 to the RAD program complies with the site selection requirements for existing or rehabilitated housing set forth at 24 CFR § 983.57 (PBV), the Fair Housing Act, Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

Relocation Plan

Not applicable.

Significant Amendment Definition

As part of RAD, DCHA is redefining the definition of a substantial deviation from the MTW plan to exclude the following RAD-specific items:

- a. 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;
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD Conversion.

Appendix F: RAD Significant Amendment for Highland Additions

The District of Columbia Housing Authority (DCHA) seeks to rehabilitate Highland Additions through the Rental Assistance Demonstration (RAD). As a result, the DCHA will be converting 118 public housing units at Highland Additions to Project Based Vouchers under the guidelines of PIH Notice 2019-23 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 2019-23; and PIH Notice 2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. DCHA is not presently under a Voluntary Compliance Agreement or other agreement that will be adversely impacted by the RAD conversion and confirms it will comply with all applicable fair housing and civil rights requirements. The agency's compliance with applicable fair housing and civil rights requirements will not be negatively impacted by conversion activities. Further, the conversion will comply with all applicable site selection and neighborhood reviews.

HUD crafted the RAD program as a response to fill the growing gap between decreasing federal funding and increasing capital needs of public housing units and is an important tool for achieving DCHA's Transformation Plan. The program allows DCHA to utilize non-federal funding opportunities to advance major renovations and stabilize properties for long-term viability so that DCHA can achieve its goal of providing healthy and sustainability communities for our resident populations.

Upon conversion, DCHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted to RAD. DCHA may also borrow funds to address their capital needs. The total amount needed to address the capital needs will be informed by our Physical Conditions Assessment and the agency's ability to leverage additional financial resources that may be necessary for the transaction. DCHA currently has no debt for Highland Additions under the Capital Fund Financing Program and will be working with the lenders to address outstanding debt issues, which may result in additional reductions of capital funds. Regardless of any funding changes that may occur as a result of conversion under RAD, DCHA certifies that it will maintain compliance with the statutory requirement to serve substantially the same number of households.

RAD requirements include important resident protections and rights such as: guaranteed right to return to the property without rescreening, no change to residents' rent formula (remains at 30% of adjusted income), full relocation assistance during the construction phase, and continued funding of the Resident Councils after conversion.

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

Name of Public Housing Development	PIC Development ID	Conversion Type (i.e. PBV or PBRA)	Transfer of Assistance
Highland Additions	DC001016	PBV	N/A
Total Units	Pre-RAD Unit Type (i.e. Family, Senior, etc.)	Post-RAD Unit Type if Different (i.e. Family, Senior, etc.)	Capital Fund Allocation of Development
118	Family	Family	N/A

Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why
			(De Minimis Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
One Bedroom	0	0	0
Two Bedroom	118	118	0
Three Bedroom	0	0	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0

Residents Rights, Participation, Waiting List and Grievance Procedures

Section 1.6 Special Provisions Affecting Conversions to Project Based Vouchers from PIH Notice 2012- 32, REV-3

The HUD RAD Notice (PIH-2012-32 (HA) H-2017-03, REV-3 and successor notices) and existing project based voucher policies outlined in the DCHA Administrative Plan and Admissions and Continued Occupancy Policy apply at the time of the conversion of Highland Additions. DCHA has published RAD regulations amending the Administrative Plan and they are in effect.

PBV 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 DCHA 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 RAD, DCHA or the owner must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision will 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 5 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. 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. All units converted under RAD will follow the five-year phase-in outlined below. 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.

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 and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: 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.

As an MTW agency, DCHA has converted all of its households to biennial or triennial recertification cycles. For purposes of implementing the 5-year phase-in, impacted households will convert to an annual recertification until the calculated income-based TTP is reached. Once these households are on income-based TTP, the households will convert back to biennial or triennial recertification.

5. Public Housing Family Self Sufficiency (PH 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.

DCHA is allowed 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, DCHA will follow the normal closeout procedures outlined in the grant agreement. If DCHA continues to run an FSS program that serves PH and/or HCV participants, DCHA 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.

DCHA will administer the agency's 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 78100.1 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.

If DCHA becomes a ROSS-SC grantees prior to RAD conversion of a site, DCHA will be able to finish out 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.

6. Resident Participation and Funding. In accordance with HUD RAD provision, residents of RAD properties 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 in accordance with current DCHA policies and HUD regulations.

7. Resident Procedural Rights. The following items will be incorporated into both the DCHA Administrative Plan and the owner's lease, which including the required tenancy addendum, as appropriate.

a. Termination Notification. As required under RAD, DCHA's termination process will provide adequate written notice of termination of the lease as outlined below:

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. 30 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

For issues related to tenancy and termination of assistance, DCHA will provide an opportunity for an informal hearing, as outlined in 24 CFR § 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 will be given to residents for any dispute that a resident may have with respect to the owner's action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.

- 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 owner will perform the hearing.

ii. An informal hearing will not be required for class grievances or for disputes between residents not involving the 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 owner or contract administrator.

iii. The owner will 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 owner will provide opportunity for an informal hearing before an eviction. The DCHA Administrative Plan will include RAD hearing procedures.

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 HCV 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 apply 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 due to loss of employment) is covered by this waiver.

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 365 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 RAD property after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. In such 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. DCHA will 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 will 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, DCHA will remove a unit from the contract when no assistance has been paid for 365 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, DCHA will reinstate the unit after the family has vacated the property. If the project is partially assisted, the DCHA 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 RAD property. When an appropriate sized unit becomes available in the RAD property, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the RAD property, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** DCHA and the Project Owner will cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.
2. **Additional Monitoring Requirement.** DCHA's Board must approve the operating budget for the RAD property annually in accordance with HUD requirements.
3. **Establishment of Waiting List.** DCHA shall utilize the site-based waiting list(s) that exist at the time of conversion. For any applicants on the public housing waiting list that are likely to be ineligible for admission at a RAD property converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the DCHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the DCHA'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.

For RAD properties where transfer of assistance will be utilized, DCHA will notify existing waiting list applicants on how to apply they can apply for any new properties with site-based waiting lists.

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

4. **Mandatory Insurance Coverage.** The RAD property shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
5. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with

long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC.

6. **Administrative Fees for Public Housing Conversions.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds.

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

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

Site Selection and Neighborhood Standards Review

DCHA certifies that the conversion of Highland Additions to the RAD program complies with the site selection requirements for existing or rehabilitated housing set forth at 24 CFR § 983.57 (PBV), the Fair Housing Act, Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

Relocation Plan

DCHA is currently evaluating various rehabilitation scenarios, which may include in-place rehabilitation, phased on-site relocation, or off-site temporary relocation. Should any relocation be required, DCHA will comply with all applicable requirements under the RAD program, including those outlined in the RAD Relocation Notice (PIH Notice 2016-17, REV 1 or any successor), the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (URA) and related HUD guidance. DCHA will ensure that residents are provided with timely information and notices in accordance with RAD requirements, and that all eligible relocation expenses are covered. Additionally, all residents occupying a unit at the time of the RAD conversion will have a right to return in accordance with the RAD requirements.

Significant Amendment Definition

As part of RAD, DCHA is redefining the definition of a substantial deviation from the MTW plan to exclude the following RAD-specific items:

- a. 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.
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD Conversion.

Appendix G: RAD Significant Amendment for Hopkins Apartments

The District of Columbia Housing Authority (DCHA) seeks to rehabilitate Hopkins Apartments through the Rental Assistance Demonstration (RAD). As a result, the DCHA will be converting 156 public housing units at Hopkins Apartments to Project Based Vouchers under the guidelines of PIH Notice 2019-23 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 2019-23; and PIH Notice 2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. DCHA is not presently under a Voluntary Compliance Agreement or other agreement that will be adversely impacted by the RAD conversion and confirms it will comply with all applicable fair housing and civil rights requirements. The agency's compliance with applicable fair housing and civil rights requirements will not be negatively impacted by conversion activities. Further, the conversion will comply with all applicable site selection and neighborhood reviews.

HUD crafted the RAD program as a response to fill the growing gap between decreasing federal funding and increasing capital needs of public housing units and is an important tool for achieving DCHA's Transformation Plan. The program allows DCHA to utilize non-federal funding opportunities to advance major renovations and stabilize properties for long-term viability so that DCHA can achieve its goal of providing healthy and sustainability communities for our resident populations.

Upon conversion, DCHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted to RAD. DCHA may also borrow funds to address their capital needs. The total amount needed to address the capital needs will be informed by our Physical Conditions Assessment and the agency's ability to leverage additional financial resources that may be necessary for the transaction. DCHA currently has no debt for Hopkins Apartments under the Capital Fund Financing Program and will be working with the lenders to address outstanding debt issues, which may result in additional reductions of capital funds. Regardless of any funding changes that may occur as a result of conversion under RAD, DCHA certifies that it will maintain compliance with the statutory requirement to serve substantially the same number of households.

RAD requirements include important resident protections and rights such as: guaranteed right to return to the property without rescreening, no change to residents' rent formula (remains at 30% of adjusted income), full relocation assistance during the construction phase, and continued funding of the Resident Councils after conversion.

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

Name of Public Housing Development	PIC Development ID	Conversion Type (i.e. PBV or PBRA)	Transfer of Assistance
Hopkins Apartments	DC001003300	PBV	N/A
Total Units	Pre-RAD Unit Type (i.e. Family, Senior, etc.)	Post-RAD Unit Type if Different (i.e. Family, Senior, etc.)	Capital Fund Allocation of Development
156	Family	Family	N/A

Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why
			(De Minimis Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
One Bedroom	0	0	0
Two Bedroom	107	107	0
Three Bedroom	49	49	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0

Residents Rights, Participation, Waiting List and Grievance Procedures

Section 1.6 Special Provisions Affecting Conversions to Project Based Vouchers from PIH Notice 2012- 32, REV-3

The HUD RAD Notice (PIH-2012-32 (HA) H-2017-03, REV-3 and successor notices) and existing project based voucher policies outlined in the DCHA Administrative Plan and Admissions and Continued Occupancy Policy apply at the time of the conversion of Hopkins Apartments. DCHA has published RAD regulations amending the Administrative Plan and they are in effect.

PBV 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 DCHA 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 RAD, DCHA or the owner must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision will 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 5 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. 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. All units converted under RAD will follow the five-year phase-in outlined below. 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.

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 and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: 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.

As an MTW agency, DCHA has converted all of its households to biennial or triennial recertification cycles. For purposes of implementing the 5-year phase-in, impacted households will convert to an annual recertification until the calculated income-based TTP is reached. Once these households are on income-based TTP, the households will convert back to biennial or triennial recertification.

5. Public Housing Family Self Sufficiency (PH 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.

DCHA is allowed 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, DCHA will follow the normal closeout procedures outlined in the grant agreement. If DCHA continues to run an FSS program that serves PH and/or HCV participants, DCHA 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.

DCHA will administer the agency's 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 78100.1 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.

If DCHA becomes a ROSS-SC grantees prior to RAD conversion of a site, DCHA will be able to finish out 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.

6. Resident Participation and Funding. In accordance with HUD RAD provision, residents of RAD properties 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 in accordance with current DCHA policies and HUD regulations.

7. Resident Procedural Rights. The following items will be incorporated into both the DCHA Administrative Plan and the owner's lease, which including the required tenancy addendum, as appropriate.

- a. Termination Notification.** As required under RAD, DCHA's termination process will provide adequate written notice of termination of the lease as outlined below:
- 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. 30 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

For issues related to tenancy and termination of assistance, DCHA will provide an opportunity for an informal hearing, as outlined in 24 CFR § 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 will be given to residents for any dispute that a resident may have with respect to the owner's action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - 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 owner will perform the hearing.

ii. An informal hearing will not be required for class grievances or for disputes between residents not involving the 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 owner or contract administrator.

iii. The owner will 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 owner will provide opportunity for an informal hearing before an eviction. The DCHA Administrative Plan will include RAD hearing procedures.

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 HCV 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 apply 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 due to loss of employment) is covered by this waiver.

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 365 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 RAD property after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. In such 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. DCHA will 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 will 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, DCHA will remove a unit from the contract when

no assistance has been paid for 365 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, DCHA will reinstate the unit after the family has vacated the property. If the project is partially assisted, the DCHA 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 RAD property. When an appropriate sized unit becomes available in the RAD property, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the RAD property, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** DCHA and the Project Owner will cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.
2. **Additional Monitoring Requirement.** DCHA's Board must approve the operating budget for the RAD property annually in accordance with HUD requirements.
3. **Establishment of Waiting List.** DCHA shall utilize the site-based waiting list(s) that exist at the time of conversion. For any applicants on the public housing waiting list that are likely to be ineligible for admission at a RAD property converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the DCHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the DCHA'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.

For RAD properties where transfer of assistance will be utilized, DCHA will notify existing waiting list applicants on how to apply they can apply for any new properties with site-based waiting lists.

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

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

6. **Administrative Fees for Public Housing Conversions.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds.

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

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

Site Selection and Neighborhood Standards Review

DCHA certifies that the conversion of Hopkins Apartments to the RAD program complies with the site selection requirements for existing or rehabilitated housing set forth at 24 CFR § 983.57 (PBV), the Fair Housing Act, Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

Relocation Plan

DCHA is currently evaluating various rehabilitation scenarios, which may include in-place rehabilitation, phased on-site relocation, or off-site temporary relocation. Should any relocation be required, DCHA will comply with all applicable requirements under the RAD program, including those outlined in the RAD Relocation Notice (PIH Notice 2016-17, REV 1 or any successor), the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (URA) and related HUD guidance. DCHA will ensure that residents are provided with timely information and notices in accordance with RAD requirements, and that all eligible relocation expenses are covered. Additionally, all residents occupying a unit at the time of the RAD conversion will have a right to return in accordance with the RAD requirements.

Significant Amendment Definition

As part of RAD, DCHA is redefining the definition of a substantial deviation from the MTW plan to exclude the following RAD-specific items:

- a. 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.
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD Conversion.

Appendix H: RAD Significant Amendment for James Creek

The District of Columbia Housing Authority (DCHA) seeks to rehabilitate James Creek through the Rental Assistance Demonstration (RAD). As a result, the DCHA will be converting 242 public housing units at James Creek to Project Based Vouchers under the guidelines of PIH Notice 2019-23 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 2019-23; and PIH Notice 2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. DCHA is not presently under a Voluntary Compliance Agreement or other agreement that will be adversely impacted by the RAD conversion and confirms it will comply with all applicable fair housing and civil rights requirements. The agency's compliance with applicable fair housing and civil rights requirements will not be negatively impacted by conversion activities. Further, the conversion will comply with all applicable site selection and neighborhood reviews.

HUD crafted the RAD program as a response to fill the growing gap between decreasing federal funding and increasing capital needs of public housing units and is an important tool for achieving DCHA's Transformation Plan. The program allows DCHA to utilize non-federal funding opportunities to advance major renovations and stabilize properties for long-term viability so that DCHA can achieve its goal of providing healthy and sustainability communities for our resident populations.

Upon conversion, DCHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted to RAD. DCHA may also borrow funds to address their capital needs. The total amount needed to address the capital needs will be informed by our Physical Conditions Assessment and the agency's ability to leverage additional financial resources that may be necessary for the transaction. DCHA currently has no debt for James Creek under the Capital Fund Financing Program and will be working with the lenders to address outstanding debt issues, which may result in additional reductions of capital funds. Regardless of any funding changes that may occur as a result of conversion under RAD, DCHA certifies that it will maintain compliance with the statutory requirement to serve substantially the same number of households.

RAD requirements include important resident protections and rights such as: guaranteed right to return to the property without rescreening, no change to residents' rent formula (remains at 30% of adjusted income), full relocation assistance during the construction phase, and continued funding of the Resident Councils after conversion.

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

Name of Public Housing Development	PIC Development ID	Conversion Type (i.e. PBV or PBRA)	Transfer of Assistance
James Creek	DC00100103	PBV	N/A
Total Units	Pre-RAD Unit Type (i.e. Family, Senior, etc.)	Post-RAD Unit Type if Different (i.e. Family, Senior, etc.)	Capital Fund Allocation of Development
242	Family	Family	N/A

Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
Studio	1	1	0
One Bedroom	45	45	0
Two Bedroom	147	147	0
Three Bedroom	16	16	0
Four Bedroom	26	26	0
Five Bedroom	4	4	0
Six Bedroom	3	3	0

Residents Rights, Participation, Waiting List and Grievance Procedures

Section 1.6 Special Provisions Affecting Conversions to Project Based Vouchers from PIH Notice 2012- 32, REV-3

The HUD RAD Notice (PIH-2012-32 (HA) H-2017-03, REV-3 and successor notices) and existing project based voucher policies outlined in the DCHA Administrative Plan and Admissions and Continued Occupancy Policy apply at the time of the conversion of James Creek DCHA has published RAD regulations amending the Administrative Plan and they are in effect.

PBV 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 DCHA 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 RAD, DCHA or the owner must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision will 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 5 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. 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. All units converted under RAD will follow the five-year phase-in outlined below. 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.

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 and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: 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.

As an MTW agency, DCHA has converted all of its households to biennial or triennial recertification cycles. For purposes of implementing the 5-year phase-in, impacted households will convert to an annual recertification until the calculated income-based TTP is reached. Once these households are on income-based TTP, the households will convert back to biennial or triennial recertification.

5. Public Housing Family Self Sufficiency (PH 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.

DCHA is allowed 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, DCHA will follow the normal closeout procedures outlined in the grant agreement. If DCHA continues to run an FSS program that serves PH and/or HCV participants, DCHA 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.

DCHA will administer the agency's 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 78100.1 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.

If DCHA becomes a ROSS-SC grantees prior to RAD conversion of a site, DCHA will be able to finish out 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.

6. Resident Participation and Funding. In accordance with HUD RAD provision, residents of RAD properties 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 in accordance with current DCHA policies and HUD regulations.

7. Resident Procedural Rights. The following items will be incorporated into both the DCHA Administrative Plan and the owner's lease, which including the required tenancy addendum, as appropriate.

- i. **Termination Notification.** As required under RAD, DCHA's termination process will provide adequate written notice of termination of the lease as outlined below:
 - 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. 30 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.
- ii. **Grievance Process.** For issues related to tenancy and termination of assistance, DCHA will provide an opportunity for an informal hearing, as outlined in 24 CFR § 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 will be given to residents for any dispute that a resident may have with respect to the owner's action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - 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 owner will perform the hearing.
- ii. An informal hearing will not be required for class grievances or for disputes between residents not involving the 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 owner or contract administrator.
- iii. The owner will 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 owner will provide opportunity for an informal hearing before an eviction. The DCHA Administrative Plan will include RAD hearing procedures.

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 HCV 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 apply 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 due to loss of employment) is covered by this waiver.

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 365 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 RAD property after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. In such 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. DCHA will 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 will 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, DCHA will remove a unit from the contract when no assistance has been paid for 365 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, DCHA will reinstate the unit after the family has vacated the property. If the project is partially assisted, the DCHA 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 RAD property. When an appropriate sized unit becomes available in the RAD property, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the RAD property, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** DCHA and the Project Owner will cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.
2. **Additional Monitoring Requirement.** DCHA's Board must approve the operating budget for the RAD property annually in accordance with HUD requirements.
3. **Establishment of Waiting List.** DCHA shall utilize the site-based waiting list(s) that exist at the time of conversion. For any applicants on the public housing waiting list that are likely to be ineligible for admission at a RAD property converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the DCHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the DCHA'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.

For RAD properties where transfer of assistance will be utilized, DCHA will notify existing waiting list applicants on how to apply they can apply for any new properties with site-based waiting lists.

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

4. **Mandatory Insurance Coverage.** The RAD property shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
5. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with

long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC.

6. **Administrative Fees for Public Housing Conversions.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds.

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

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

Site Selection and Neighborhood Standards Review

DCHA certifies that the conversion of James Creek to the RAD program complies with the site selection requirements for existing or rehabilitated housing set forth at 24 CFR § 983.57 (PBV), the Fair Housing Act, Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

Relocation Plan

DCHA is currently evaluating various rehabilitation scenarios, which may include in-place rehabilitation, phased on-site relocation, or off-site temporary relocation. Should any relocation be required, DCHA will comply with all applicable requirements under the RAD program, including those outlined in the RAD Relocation Notice (PIH Notice 2016-17, REV 1 or any successor), the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (URA) and related HUD guidance. DCHA will ensure that residents are provided with timely information and notices in accordance with RAD requirements, and that all eligible relocation expenses are covered. Additionally, all residents occupying a unit at the time of the RAD conversion will have a right to return in accordance with the RAD requirements.

Significant Amendment Definition

As part of RAD, DCHA is redefining the definition of a substantial deviation from the MTW plan to exclude the following RAD-specific items:

- a. 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.
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD Conversion.

Appendix I: RAD Significant Amendment for Lincoln Heights

The District of Columbia Housing Authority (DCHA) seeks to rehabilitate Lincoln Heights through the Rental Assistance Demonstration (RAD). As a result, the DCHA will be converting 440 public housing units at Lincoln Heights to Project Based Vouchers under the guidelines of PIH Notice 2019-23 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 2019-23; and PIH Notice 2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. DCHA is not presently under a Voluntary Compliance Agreement or other agreement that will be adversely impacted by the RAD conversion and confirms it will comply with all applicable fair housing and civil rights requirements. The agency's compliance with applicable fair housing and civil rights requirements will not be negatively impacted by conversion activities. Further, the conversion will comply with all applicable site selection and neighborhood reviews.

HUD crafted the RAD program as a response to fill the growing gap between decreasing federal funding and increasing capital needs of public housing units and is an important tool for achieving DCHA's Transformation Plan. The program allows DCHA to utilize non-federal funding opportunities to advance major renovations and stabilize properties for long-term viability so that DCHA can achieve its goal of providing healthy and sustainability communities for our resident populations.

Upon conversion, DCHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted to RAD. DCHA may also borrow funds to address their capital needs. The total amount needed to address the capital needs will be informed by our Physical Conditions Assessment and the agency's ability to leverage additional financial resources that may be necessary for the transaction. DCHA currently has no debt for Lincoln Heights under the Capital Fund Financing Program and will be working with the lenders to address outstanding debt issues, which may result in additional reductions of capital funds. Regardless of any funding changes that may occur as a result of conversion under RAD, DCHA certifies that it will maintain compliance with the statutory requirement to serve substantially the same number of households.

RAD requirements include important resident protections and rights such as: guaranteed right to return to the property without rescreening, no change to residents' rent formula (remains at 30% of adjusted income), full relocation assistance during the construction phase, and continued funding of the Resident Councils after conversion.

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

Name of Public Housing Development	PIC Development ID	Conversion Type (i.e. PBV or PBRA)	Transfer of Assistance
Lincoln Heights	DC001002130	PBV	N/A
Total Units	Pre-RAD Unit Type (i.e. Family, Senior, etc.)	Post-RAD Unit Type if Different (i.e. Family, Senior, etc.)	Capital Fund Allocation of Development
440	Family	Family	N/A

Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why
			(De Minimis Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
One Bedroom	57	57	0
Two Bedroom	213	213	0
Three Bedroom	101	101	0
Four Bedroom	36	36	0
Five Bedroom	0	0	0

Residents Rights, Participation, Waiting List and Grievance Procedures

Section 1.6 Special Provisions Affecting Conversions to Project Based Vouchers from PIH Notice 2012- 32, REV-3

The HUD RAD Notice (PIH-2012-32 (HA) H-2017-03, REV-3 and successor notices) and existing project based voucher policies outlined in the DCHA Administrative Plan and Admissions and Continued Occupancy Policy apply at the time of the conversion of Lincoln Heights. DCHA has published RAD regulations amending the Administrative Plan and they are in effect.

PBV 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 DCHA 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 RAD, DCHA or the owner must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision will 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 5 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. 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. All units converted under RAD will follow the five-year phase-in outlined below. 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.

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 and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: 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.

As an MTW agency, DCHA has converted all of its households to biennial or triennial recertification cycles. For purposes of implementing the 5-year phase-in, impacted households will convert to an annual recertification until the calculated income-based TTP is reached. Once these households are on income-based TTP, the households will convert back to biennial or triennial recertification.

5. Public Housing Family Self Sufficiency (PH 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.

DCHA is allowed 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, DCHA will follow the normal closeout procedures outlined in the grant agreement. If DCHA continues to run an FSS program that serves PH and/or HCV participants, DCHA 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.

DCHA will administer the agency's 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 78100.1 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.

If DCHA becomes a ROSS-SC grantees prior to RAD conversion of a site, DCHA will be able to finish out 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.

6. Resident Participation and Funding. In accordance with HUD RAD provision, residents of RAD properties 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 in accordance with current DCHA policies and HUD regulations.

7. Resident Procedural Rights. The following items will be incorporated into both the DCHA Administrative Plan and the owner's lease, which including the required tenancy addendum, as appropriate.

- i. **Termination Notification.** As required under RAD, DCHA's termination process will provide adequate written notice of termination of the lease as outlined below:
 - 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. 30 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.
- ii. **Grievance Process.** For issues related to tenancy and termination of assistance, DCHA will provide an opportunity for an informal hearing, as outlined in 24 CFR § 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 will be given to residents for any dispute that a resident may have with respect to the owner's action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - 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 owner will perform the hearing.

- ii. An informal hearing will not be required for class grievances or for disputes between residents not involving the 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 owner or contract administrator.
- iii. The owner will 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 owner will provide opportunity for an informal hearing before an eviction. The DCHA Administrative Plan will include RAD hearing procedures.

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 HCV 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 apply 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 due to loss of employment) is covered by this waiver.

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 365 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 RAD property after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. In such 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. DCHA will 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 will 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, DCHA will remove a unit from the contract when no assistance has been paid for 365 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, DCHA will reinstate the unit after the family has vacated the property. If the project is partially assisted, the DCHA 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 RAD property. When an appropriate sized unit becomes available in the RAD property, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the RAD property, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

PBV: Other Miscellaneous Provisions

1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration. DCHA and the Project Owner will cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.

2. Additional Monitoring Requirement. DCHA's Board must approve the operating budget for the RAD property annually in accordance with HUD requirements.

3. Establishment of Waiting List. DCHA shall utilize the site-based waiting list(s) that exist at the time of conversion. For any applicants on the public housing waiting list that are likely to be ineligible for admission at a RAD property converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the DCHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the DCHA'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.

For RAD properties where transfer of assistance will be utilized, DCHA will notify existing waiting list applicants on how to apply they can apply for any new properties with site-based waiting lists.

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

4. Mandatory Insurance Coverage. The RAD property shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.

5. Future Refinancing. Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time

of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC.

6. Administrative Fees for Public Housing Conversions. For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds.

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

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

Site Selection and Neighborhood Standards Review

DCHA certifies that the conversion of Lincoln Heights to the RAD program complies with the site selection requirements for existing or rehabilitated housing set forth at 24 CFR § 983.57 (PBV), the Fair Housing Act, Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

Relocation Plan

DCHA is currently evaluating various rehabilitation scenarios, which may include in-place rehabilitation, phased on-site relocation, or off-site temporary relocation. Should any relocation be required, DCHA will comply with all applicable requirements under the RAD program, including those outlined in the RAD Relocation Notice (PIH Notice 2016-17, REV 1 or any successor), the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (URA) and related HUD guidance. DCHA will ensure that residents are provided with timely information and notices in accordance with RAD requirements, and that all eligible relocation expenses are covered. Additionally, all residents occupying a unit at the time of the RAD conversion will have a right to return in accordance with the RAD requirements.

Significant Amendment Definition

As part of RAD, DCHA is redefining the definition of a substantial deviation from the MTW plan to exclude the following RAD-specific items:

- a. 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.
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD Conversion.

Appendix J: RAD Significant Amendment for Stoddart Terrace

The District of Columbia Housing Authority (DCHA) seeks to rehabilitate Stoddart Terrace through the Rental Assistance Demonstration (RAD). As a result, the DCHA will be converting 158 public housing units at Stoddart Terrace to Project Based Vouchers under the guidelines of PIH Notice 2019-23 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 2019-23; and PIH Notice 2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. DCHA is not presently under a Voluntary Compliance Agreement or other agreement that will be adversely impacted by the RAD conversion and confirms it will comply with all applicable fair housing and civil rights requirements. The agency's compliance with applicable fair housing and civil rights requirements will not be negatively impacted by conversion activities. Further, the conversion will comply with all applicable site selection and neighborhood reviews.

HUD crafted the RAD program as a response to fill the growing gap between decreasing federal funding and increasing capital needs of public housing units and is an important tool for achieving DCHA's Transformation Plan. The program allows DCHA to utilize non-federal funding opportunities to advance major renovations and stabilize properties for long-term viability so that DCHA can achieve its goal of providing healthy and sustainability communities for our resident populations.

Upon conversion, DCHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted to RAD. DCHA may also borrow funds to address their capital needs. The total amount needed to address the capital needs will be informed by our Physical Conditions Assessment and the agency's ability to leverage additional financial resources that may be necessary for the transaction. DCHA currently has no debt for Stoddart Terrace under the Capital Fund Financing Program and will be working with the lenders to address outstanding debt issues, which may result in additional reductions of capital funds. Regardless of any funding changes that may occur as a result of conversion under RAD, DCHA certifies that it will maintain compliance with the statutory requirement to serve substantially the same number of households.

RAD requirements include important resident protections and rights such as: guaranteed right to return to the property without rescreening, no change to residents' rent formula (remains at 30% of adjusted income), full relocation assistance during the construction phase, and continued funding of the Resident Councils after conversion.

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

Name of Public Housing Development	PIC Development ID	Conversion Type (i.e. PBV or PBRA)	Transfer of Assistance
Stoddart Terrace	DC001023	PBV	N/A
Total Units	Pre-RAD Unit Type (i.e. Family, Senior, etc.)	Post-RAD Unit Type if Different (i.e. Family, Senior, etc.)	Capital Fund Allocation of Development
158	Family	Family	N/A

Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why
			(De Minimis Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
One Bedroom	0	0	0
Two Bedroom	9	9	0
Three Bedroom	56	56	0
Four Bedroom	65	65	0
Five Bedroom	25	25	0

Residents Rights, Participation, Waiting List and Grievance Procedures

Section 1.6 Special Provisions Affecting Conversions to Project Based Vouchers from PIH Notice 2012- 32, REV-3

The HUD RAD Notice (PIH-2012-32 (HA) H-2017-03, REV-3 and successor notices) and existing project based voucher policies outlined in the DCHA Administrative Plan and Admissions and Continued Occupancy Policy apply at the time of the conversion of Stoddart Terrace. DCHA has published RAD regulations amending the Administrative Plan and they are in effect.

PBV 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 DCHA 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 RAD, DCHA or the owner must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision will 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 5 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. 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. All units converted under RAD will follow the five-year phase-in outlined below. 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.

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 and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: 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.

As an MTW agency, DCHA has converted all of its households to biennial or triennial recertification cycles. For purposes of implementing the 5-year phase-in, impacted households will convert to an annual recertification until the calculated income-based TTP is reached. Once these households are on income-based TTP, the households will convert back to biennial or triennial recertification.

5. Public Housing Family Self Sufficiency (PH 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.

DCHA is allowed 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, DCHA will follow the normal closeout procedures outlined in the grant agreement. If DCHA continues to run an FSS program that serves PH and/or HCV participants, DCHA 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.

DCHA will administer the agency's 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 78100.1 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.

If DCHA becomes a ROSS-SC grantees prior to RAD conversion of a site, DCHA will be able to finish out 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.

6. Resident Participation and Funding. In accordance with HUD RAD provision, residents of RAD properties 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 in accordance with current DCHA policies and HUD regulations.

7. Resident Procedural Rights. The following items will be incorporated into both the DCHA Administrative Plan and the owner's lease, which including the required tenancy addendum, as appropriate.

- i. **Termination Notification.** As required under RAD, DCHA's termination process will provide adequate written notice of termination of the lease as outlined below:
 - 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. 30 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.
- ii. **Grievance Process.** For issues related to tenancy and termination of assistance, DCHA will provide an opportunity for an informal hearing, as outlined in 24 CFR § 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 will be given to residents for any dispute that a resident may have with respect to the owner's action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - 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 owner will perform the hearing.
 - ii. An informal hearing will not be required for class grievances or for disputes between residents not involving the 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 owner or contract administrator.

- iii. The owner will 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 owner will provide opportunity for an informal hearing before an eviction. The DCHA Administrative Plan will include RAD hearing procedures.

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 HCV 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 apply 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 due to loss of employment) is covered by this waiver.

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 365 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 RAD property after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. In such 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. DCHA will 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 will 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, DCHA will remove a unit from the contract when no assistance has been paid for 365 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, DCHA will reinstate the unit after the family has vacated the property. If the project is partially assisted, the DCHA 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 RAD property. When an appropriate sized unit becomes available in the RAD property, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the RAD property, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

PBV: Other Miscellaneous Provisions

2. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** DCHA and the Project Owner will cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.

3. **Additional Monitoring Requirement.** DCHA's Board must approve the operating budget for the RAD property annually in accordance with HUD requirements.

4. **Establishment of Waiting List.** DCHA shall utilize the site-based waiting list(s) that exist at the time of conversion. For any applicants on the public housing waiting list that are likely to be ineligible for admission at a RAD property converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the DCHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the DCHA'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.

For RAD properties where transfer of assistance will be utilized, DCHA will notify existing waiting list applicants on how to apply they can apply for any new properties with site-based waiting lists.

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

5. **Mandatory Insurance Coverage.** The RAD property shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.

6. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC.

7. **Administrative Fees for Public Housing Conversions.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds.

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

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

Site Selection and Neighborhood Standards Review

DCHA certifies that the conversion of Stoddart Terrace to the RAD program complies with the site selection requirements for existing or rehabilitated housing set forth at 24 CFR § 983.57 (PBV), the Fair Housing Act, Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

Relocation Plan

DCHA is currently evaluating various rehabilitation scenarios, which may include in-place rehabilitation, phased on-site relocation, or off-site temporary relocation. Should any relocation be required, DCHA will comply with all applicable requirements under the RAD program, including those outlined in the RAD Relocation Notice (PIH Notice 2016-17, REV 1 or any successor), the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (URA) and related HUD guidance. DCHA will ensure that residents are provided with timely information and notices in accordance with RAD requirements, and that all eligible relocation expenses are covered. Additionally, all residents occupying a unit at the time of the RAD conversion will have a right to return in accordance with the RAD requirements.

Significant Amendment Definition

As part of RAD, DCHA is redefining the definition of a substantial deviation from the MTW plan to exclude the following RAD-specific items:

- a. 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.
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD Conversion.

Appendix K: RAD Significant Amendment for Syphax Gardens

The District of Columbia Housing Authority (DCHA) seeks to rehabilitate Syphax Gardens through the Rental Assistance Demonstration (RAD). As a result, the DCHA will be converting 174 public housing units at Syphax Gardens to Project Based Vouchers under the guidelines of PIH Notice 2019-23 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 2019-23; and PIH Notice 2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. DCHA is not presently under a Voluntary Compliance Agreement or other agreement that will be adversely impacted by the RAD conversion and confirms it will comply with all applicable fair housing and civil rights requirements. The agency's compliance with applicable fair housing and civil rights requirements will not be negatively impacted by conversion activities. Further, the conversion will comply with all applicable site selection and neighborhood reviews.

HUD crafted the RAD program as a response to fill the growing gap between decreasing federal funding and increasing capital needs of public housing units and is an important tool for achieving DCHA's Transformation Plan. The program allows DCHA to utilize non-federal funding opportunities to advance major renovations and stabilize properties for long-term viability so that DCHA can achieve its goal of providing healthy and sustainability communities for our resident populations.

Upon conversion, DCHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted to RAD. DCHA may also borrow funds to address their capital needs. The total amount needed to address the capital needs will be informed by our Physical Conditions Assessment and the agency's ability to leverage additional financial resources that may be necessary for the transaction. DCHA currently has no debt for Syphax Gardens under the Capital Fund Financing Program and will be working with the lenders to address outstanding debt issues, which may result in additional reductions of capital funds. Regardless of any funding changes that may occur as a result of conversion under RAD, DCHA certifies that it will maintain compliance with the statutory requirement to serve substantially the same number of households.

RAD requirements include important resident protections and rights such as: guaranteed right to return to the property without rescreening, no change to residents' rent formula (remains at 30% of adjusted income), full relocation assistance during the construction phase, and continued funding of the Resident Councils after conversion.

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

Name of Public Housing Development	PIC Development ID	Conversion Type (i.e. PBV or PBRA)	Transfer of Assistance
Syphax Gardens	DC001004240	PBV	N/A
Total Units	Pre-RAD Unit Type (i.e. Family, Senior, etc.)	Post-RAD Unit Type if Different (i.e. Family, Senior, etc.)	Capital Fund Allocation of Development
174	Family	Family	N/A

Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why
			(De Minimis Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
One Bedroom	0	0	0
Two Bedroom	126	126	0
Three Bedroom	46	46	0
Four Bedroom	0	0	0
Five Bedroom	0	0	0

Residents Rights, Participation, Waiting List and Grievance Procedures

Section 1.6 Special Provisions Affecting Conversions to Project Based Vouchers from PIH Notice 2012- 32, REV-3

The HUD RAD Notice (PIH-2012-32 (HA) H-2017-03, REV-3 and successor notices) and existing project based voucher policies outlined in the DCHA Administrative Plan and Admissions and Continued Occupancy Policy apply at the time of the conversion of Syphax Gardens. DCHA has published RAD regulations amending the Administrative Plan and they are in effect.

PBV 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 DCHA 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 RAD, DCHA or the owner must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision will 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 5 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. 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. All units converted under RAD will follow the five-year phase-in outlined below. 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.

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 and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: 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.

As an MTW agency, DCHA has converted all of its households to biennial or triennial recertification cycles. For purposes of implementing the 5-year phase-in, impacted households will convert to an annual recertification until the calculated income-based TTP is reached. Once these households are on income-based TTP, the households will convert back to biennial or triennial recertification.

5. Public Housing Family Self Sufficiency (PH 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.

DCHA is allowed 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, DCHA will follow the normal closeout procedures outlined in the grant agreement. If DCHA continues to run an FSS program that serves PH and/or HCV participants, DCHA 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.

DCHA will administer the agency's 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 78100.1 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.

If DCHA becomes a ROSS-SC grantees prior to RAD conversion of a site, DCHA will be able to finish out 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.

6. Resident Participation and Funding. In accordance with HUD RAD provision, residents of RAD properties 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 in accordance with current DCHA policies and HUD regulations.

7. Resident Procedural Rights. The following items will be incorporated into both the DCHA Administrative Plan and the owner's lease, which including the required tenancy addendum, as appropriate.

- i. **Termination Notification.** As required under RAD, DCHA's termination process will provide adequate written notice of termination of the lease as outlined below:
 - 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. 30 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.
- ii. **Grievance Process.** For issues related to tenancy and termination of assistance, DCHA will provide an opportunity for an informal hearing, as outlined in 24 CFR § 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 will be given to residents for any dispute that a resident may have with respect to the owner's action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - 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 owner will perform the hearing.
 - ii. An informal hearing will not be required for class grievances or for disputes between residents not involving the 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 owner or contract administrator.

- iii. The owner will 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 owner will provide opportunity for an informal hearing before an eviction. The DCHA Administrative Plan will include RAD hearing procedures.

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 HCV 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 apply 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 due to loss of employment) is covered by this waiver.

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 365 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 RAD property after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. In such 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. DCHA will 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 will 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, DCHA will remove a unit from the contract when no assistance has been paid for 365 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, DCHA will reinstate the unit after the family has vacated the property. If the project is partially assisted, the DCHA 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 RAD property. When an appropriate sized unit becomes available in the RAD property, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the RAD property, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** DCHA and the Project Owner will cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.
2. **Additional Monitoring Requirement.** DCHA's Board must approve the operating budget for the RAD property annually in accordance with HUD requirements.
3. **Establishment of Waiting List.** DCHA shall utilize the site-based waiting list(s) that exist at the time of conversion. For any applicants on the public housing waiting list that are likely to be ineligible for admission at a RAD property converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the DCHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the DCHA'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.

For RAD properties where transfer of assistance will be utilized, DCHA will notify existing waiting list applicants on how to apply they can apply for any new properties with site-based waiting lists.

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

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

6. **Administrative Fees for Public Housing Conversions.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds.

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

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

Site Selection and Neighborhood Standards Review

DCHA certifies that the conversion of Syphax Gardens to the RAD program complies with the site selection requirements for existing or rehabilitated housing set forth at 24 CFR § 983.57 (PBV), the Fair Housing Act, Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

Relocation Plan

DCHA is currently evaluating various rehabilitation scenarios, which may include in-place rehabilitation, phased on-site relocation, or off-site temporary relocation. Should any relocation be required, DCHA will comply with all applicable requirements under the RAD program, including those outlined in the RAD Relocation Notice (PIH Notice 2016-17, REV 1 or any successor), the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (URA) and related HUD guidance. DCHA will ensure that residents are provided with timely information and notices in accordance with RAD requirements, and that all eligible relocation expenses are covered. Additionally, all residents occupying a unit at the time of the RAD conversion will have a right to return in accordance with the RAD requirements.

Significant Amendment Definition

As part of RAD, DCHA is redefining the definition of a substantial deviation from the MTW plan to exclude the following RAD-specific items:

- a. 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.
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD Conversion.

Appendix L: RAD Significant Amendment for Woodland Terrace

The District of Columbia Housing Authority (DCHA) seeks to rehabilitate Woodland Terrace through the Rental Assistance Demonstration (RAD). As a result, the DCHA will be converting 234 public housing units at Woodland Terrace to Project Based Vouchers under the guidelines of PIH Notice 2019-23 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 2019-23; and PIH Notice 2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. DCHA is not presently under a Voluntary Compliance Agreement or other agreement that will be adversely impacted by the RAD conversion and confirms it will comply with all applicable fair housing and civil rights requirements. The agency's compliance with applicable fair housing and civil rights requirements will not be negatively impacted by conversion activities. Further, the conversion will comply with all applicable site selection and neighborhood reviews.

HUD crafted the RAD program as a response to fill the growing gap between decreasing federal funding and increasing capital needs of public housing units and is an important tool for achieving DCHA's Transformation Plan. The program allows DCHA to utilize non-federal funding opportunities to advance major renovations and stabilize properties for long-term viability so that DCHA can achieve its goal of providing healthy and sustainability communities for our resident populations.

Upon conversion, DCHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted to RAD. DCHA may also borrow funds to address their capital needs. The total amount needed to address the capital needs will be informed by our Physical Conditions Assessment and the agency's ability to leverage additional financial resources that may be necessary for the transaction. DCHA currently has no debt for Woodland Terrace under the Capital Fund Financing Program and will be working with the lenders to address outstanding debt issues, which may result in additional reductions of capital funds. Regardless of any funding changes that may occur as a result of conversion under RAD, DCHA certifies that it will maintain compliance with the statutory requirement to serve substantially the same number of households.

RAD requirements include important resident protections and rights such as: guaranteed right to return to the property without rescreening, no change to residents' rent formula (remains at 30% of adjusted income), full relocation assistance during the construction phase, and continued funding of the Resident Councils after conversion.

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

Name of Public Housing Development	PIC Development ID	Conversion Type (i.e. PBV or PBRA)	Transfer of Assistance
Woodland Terrace	DC001003361	PBV	N/A
Total Units	Pre-RAD Unit Type (i.e. Family, Senior, etc.)	Post-RAD Unit Type if Different (i.e. Family, Senior, etc.)	Capital Fund Allocation of Development
234	Family	Family	N/A

Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why
			(De Minimis Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
One Bedroom	36	36	0
Two Bedroom	42	42	0
Three Bedroom	78	78	0
Four Bedroom	39	39	0
Five Bedroom	26	26	0
Six Bedroom	13	13	0

Residents Rights, Participation, Waiting List and Grievance Procedures

Section 1.6 Special Provisions Affecting Conversions to Project Based Vouchers from PIH Notice 2012- 32, REV-3

The HUD RAD Notice (PIH-2012-32 (HA) H-2017-03, REV-3 and successor notices) and existing project based voucher policies outlined in the DCHA Administrative Plan and Admissions and Continued Occupancy Policy apply at the time of the conversion of Woodland Terrace. DCHA has published RAD regulations amending the Administrative Plan and they are in effect.

PBV 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 DCHA 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 RAD, DCHA or the owner must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision will 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 5 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. 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. All units converted under RAD will follow the five-year phase-in outlined below. 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.

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 and the standard TTP

Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the standard TTP

Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the standard TTP

Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the standard TTP

Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: 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.

As an MTW agency, DCHA has converted all of its households to biennial or triennial recertification cycles. For purposes of implementing the 5-year phase-in, impacted households will convert to an annual recertification until the calculated income-based TTP is reached. Once these households are on income-based TTP, the households will convert back to biennial or triennial recertification.

5. Public Housing Family Self Sufficiency (PH 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.

DCHA is allowed 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, DCHA will follow the normal closeout procedures outlined in the grant agreement. If DCHA continues to run an FSS program that serves PH and/or HCV participants, DCHA 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.

DCHA will administer the agency's 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 78100.1 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.

If DCHA becomes a ROSS-SC grantees prior to RAD conversion of a site, DCHA will be able to finish out 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.

6. Resident Participation and Funding. In accordance with HUD RAD provision, residents of RAD properties 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 in accordance with current DCHA policies and HUD regulations.

7. Resident Procedural Rights. The following items will be incorporated into both the DCHA Administrative Plan and the owner's lease, which including the required tenancy addendum, as appropriate.

- i. **Termination Notification.** As required under RAD, DCHA's termination process will provide adequate written notice of termination of the lease as outlined below:
 - 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. 30 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.
- ii. **Grievance Process.** For issues related to tenancy and termination of assistance, DCHA will provide an opportunity for an informal hearing, as outlined in 24 CFR § 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 will be given to residents for any dispute that a resident may have with respect to the owner's action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - 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 owner will perform the hearing.

- ii. An informal hearing will not be required for class grievances or for disputes between residents not involving the 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 owner or contract administrator.
- iii. The owner will 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 owner will provide opportunity for an informal hearing before an eviction. The DCHA Administrative Plan will include RAD hearing procedures.

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 HCV 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 apply 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 due to loss of employment) is covered by this waiver.

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 365 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 RAD property after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice. In such 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. DCHA will 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 will 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, DCHA will remove a unit from the contract when no assistance has been paid for 365 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, DCHA will reinstate the unit after the family has vacated the property. If the project is partially assisted, the DCHA 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 RAD property. When an appropriate sized unit becomes available in the RAD property, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the RAD property, 24 CFR § 983.260 is waived. MTW agencies may not modify this requirement.

PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** DCHA and the Project Owner will cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.
2. **Additional Monitoring Requirement.** DCHA's Board must approve the operating budget for the RAD property annually in accordance with HUD requirements.
3. **Establishment of Waiting List.** DCHA shall utilize the site-based waiting list(s) that exist at the time of conversion. For any applicants on the public housing waiting list that are likely to be ineligible for admission at a RAD property converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the DCHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the DCHA'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.

For RAD properties where transfer of assistance will be utilized, DCHA will notify existing waiting list applicants on how to apply they can apply for any new properties with site-based waiting lists.

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

4. **Mandatory Insurance Coverage.** The RAD property shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
5. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time

of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC.

6. **Administrative Fees for Public Housing Conversions.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds.

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

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

Site Selection and Neighborhood Standards Review

DCHA certifies that the conversion of Woodland Terrace to the RAD program complies with the site selection requirements for existing or rehabilitated housing set forth at 24 CFR § 983.57 (PBV), the Fair Housing Act, Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act.

Relocation Plan

DCHA is currently evaluating various relocation scenarios, which may include in-place relocation, phased on-site relocation, or off-site temporary relocation. Should any relocation be required, DCHA will comply with all applicable requirements under the RAD program, including those outlined in the RAD Relocation Notice (PIH Notice 2016-17, REV 1 or any successor), the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (URA) and related HUD guidance. DCHA will ensure that residents are provided with timely information and notices in accordance with RAD requirements, and that all eligible relocation expenses are covered. Additionally, all residents occupying a unit at the time of the RAD conversion will have a right to return in accordance with the RAD requirements.

Significant Amendment Definition

As part of RAD, DCHA is redefining the definition of a substantial deviation from the MTW plan to exclude the following RAD-specific items:

- a. 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.
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD Conversion.