

DISTRICT OF COLUMBIA HOUSING AUTHORITY

FY2024 Moving to Work Plan



Keith Pettigrew
Executive Director

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DISTRICT OF COLUMBIA HOUSING AUTHORITY

300 Seventh Street Southwest

Washington DC 20024

Phone: 202-535-1000

Email: info@dchousing.org

Website: www.dchousing.org

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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 in 2016 and is scheduled to expire at the end of the Housing Authority’s 2028 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: 3/31/2024).

Cover photo—During FY2023, DCHA opened three new Customer Service Centers equipped with staff, kiosks, wi-fi, printers, laptops, and scanners to provide convenient in-person service to all clients. For more information, please visit DCHA’s website at <https://www.dchousing.org/wordpress/customers/customer-service-centers/>.

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Section I. Introduction

A. Overview

The District of Columbia Housing Authority (DCHA) is dedicated to addressing the housing needs of our community's most vulnerable populations. As an independent public agency, DCHA provides housing assistance to nearly 10% of Washington, D.C.'s residents. Our work encompasses roles as a landlord, property manager, voucher administrator, and real estate developer.

Our Mission:

DCHA provides quality affordable housing to extremely low- through moderate-income households, fosters sustainable communities, and cultivates opportunities for residents to improve their lives.

Over the past several years, DCHA has made significant strides in fulfilling this mission. We have successfully housed nearly 1,000 people from our waitlist, moved 157 people into public housing units, and completed almost 400 renovations to prepare units for occupancy. We are proud of our ongoing efforts to serve our community, including processing over 300 reasonable accommodation requests, answering thousands of calls daily through our call center, and conducting resident elections and town halls to ensure resident voices are heard.

While we have made progress, we recognize that there is still much work to be done. DCHA remains committed to continuous improvement, addressing challenges head-on, and working collaboratively with our communities and partner agencies to advance our mission. One critical component of our work is our participation in the Moving to Work (MTW) program. Established in 2003, the MTW program has been an essential catalyst for innovation within our agency, allowing us to design and implement inventive approaches to local housing and policy issues.

The MTW program, facilitated by the U.S. Department of Housing and Urban Development (HUD), provides DCHA with the flexibility to combine funding and adapt policies to best serve our community's unique needs. In FY2016, our MTW agreement with HUD was extended to 2028, enabling us to build upon the progress we have made and further explore innovative strategies to address local affordable housing challenges. Our MTW Plan is guided by our Agency's Mission Statement and Strategic Goals and advances the three MTW Statutory Objectives.

As DCHA enters its 21st year in the MTW program, we are dedicated to expanding opportunities for the families we serve and maximizing positive life outcomes for our community members. This commitment has driven us to break ground on long-delayed projects, such as Kenilworth, Barry Farm, and Park Morton, to provide beautiful new housing for our residents. It has also led us to implement programs and initiatives aimed at engaging with our residents and improving their quality of life.

In 2023, we are embracing recent achievements and the expectations that come with continued progress—demonstrating our readiness for the challenges ahead. We are fortunate to have a committed Board, strong financial resources, and a dedicated team of staff members working to advance our mission. We are focused on making public housing better, addressing urgent needs, and improving the safety and habitability of our units. We are working with urgency, knowing that improving the lives and well-being of our residents is core to our work.



In the pages that follow, you will find an overview of our agency's work, our MTW Plan, and our continued commitment to serving the District of Columbia. We are confident that, with the support of our community, partners, and stakeholders, we will continue to make a significant impact on the lives of those we serve.

DCHA's Strategic Goals

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

MTW Statutory Objectives

1. Reduce cost and achieve greater costs effectiveness in federal expenditures;
2. Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
3. Increase housing choices for low-income families.



B. Short-Term and Long-Term MTW Goals and Objectives

DCHA is committed to fulfilling its mission and strategic goals by exploring opportunities that reflect local housing needs and meet MTW statutory objectives. DCHA leverages the flexibility provided by its MTW designation to implement program efficiencies, preserve and increase affordable housing, and improve the well-being of the residents and families the agency serves. Undergoing a transformation of people, properties, and internal programs, DCHA updated its Administrative Plan, ACOP, and FY2023 MTW Annual Plan to align with HUD regulations, industry best practices, and state policies. These policies were posted as emergency and proposed regulations in the District of Columbia Municipal Regulations after extensive public engagement. With staff trained on the new policies and procedures, DCHA will focus on tight operations, data-driven policy decisions, and housing families expeditiously in safe and appropriate conditions in FY2024.

Long-Term

DCHA is developing outcome-based housing programs with streamlined administrative functions, focusing on providing seniors and the disabled with dignified living opportunities, helping residents and participants achieve their goals, supporting youth in realizing their potential, and promoting homeownership and better access to public and private services. As the administrator of the Housing Choice Voucher (HCV) program, DCHA aims to improve the experiences of landlords and participants. Furthermore, DCHA is committed to expanding affordable housing opportunities in the District of Columbia by maintaining strong partnerships with public and private sectors.

Short-Term

DCHA's short-term goals and objectives aim to encourage self-sufficiency by increasing the number of families achieving homeownership, renting in the private market, and receiving self-sufficiency services. These services include an “on the ground” service coordination model led by Community Navigators, provision of space in Public Housing developments for service providers, programming through DCHA’s workforce development initiative, and upgrading computer labs in public housing communities. Moreover, DCHA will operationalize its revamped Family Self-Sufficiency program and extend a pilot rent reporting and credit-building program to help families achieve goals including homeownership, education, employment, car purchases and building small businesses.

DCHA is also working to increase housing choices through the Housing Choice Voucher Program (HCVP) and rehabilitation/redevelopment activities. Through HCVP, DCHA is focused on increasing the appeal of the program to landlords and working directly with participants to achieve their goals, ranging from moving to a different neighborhood to owning a home. Through HUD’s Faircloth to RAD tool, DCHA anticipates creating an additional 185 net new public housing units at Kenilworth Courts 166, Barry Farm 108, and Park Morton Phase I in FY2023 and FY2024. Through development and redevelopment activities, several additional projects are currently under construction, including Barry Farm, Park Morton On-Site, Bruce Monroe, and Capper/Carrollburg. DCHA is focused on increasing public housing occupancy and voucher utilization to provide access to affordable housing to additional families.

In FY2024, DCHA proposes a new initiative to change the definition of elderly to 55+ for redeveloped PBV and certain public housing properties, expanding near elderly individuals'



access to properties with focused service delivery and improved options for aging-in-place, reflecting the current composition of the agency's senior/disabled building population.

DCHA is committed to cost-effectiveness in its development plans and operations to fulfill its mission efficiently and effectively.



Section II. General Housing Authority Operating Information

A. Housing Stock Information

1. Planned New Public Housing Units

DCHA plans to temporarily add 185 net new units of public housing to its portfolio in FY2024 through Faircloth to RAD. These units will only exist as public housing units prior to RAD conversion.

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
DC001005530 Kenilworth Courts 166	0/33	31	23	9	5	0	101	Elderly & General	7	2
DC001005540 Barry Farm "The Asberry"	0/20	24					44	Elderly	4	2
DC001005500 Park Morton Phase 1	0/13	26		1			40	General	3	1
TOTAL	0/66	81	23	10	5	0	185		14	5



2. Planned Public Housing Units to be Removed

DCHA anticipates removing 755 units from the agency's public housing portfolio for conversion to project based vouchers under the Rental Assistance Demonstration (RAD) program for properties with approved CHAPs.

Planned Public Housing Units to be Removed During the Plan Year		
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
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 RAD program for RAD/Section 18 blended conversion. The property will continue to be managed by DCHA or its wholly owned affiliate.
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 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.
DC001001290 Lincoln Road*	19	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.
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 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.
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 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.
DC001001340 Park Morton	174	DCHA received a phased demo/dispo approval for this site in FY2019. Resident relocation occurred for Phase 1. A total of 60 units have been demolished and removed from PIC to date. There will be an additional 18 units removed in FY2023. Additional units will be removed prior to redevelopment in Phase 2. The site is a part of the New Communities Initiative (NCI).
DC001005190 Kenilworth	290	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. There are plans to remove additional units in FY2024. Additional units will be removed prior to redevelopment in Phase 2.
DC001001291 Sibley Townhomes	22	DCHA received demo/dispo approval for this site in FY2021. Relocation is ongoing. Buildings will be demolished after residents have been relocated and permits have been approved. The site is a part of the New Communities Initiative (NCI).
DC001001290 Sursum Corda	28	DCHA received demo/dispo approval for this site FY 2021. Relocation is ongoing. Buildings will be demolished after residents have been relocated and permits have been approved. The site is a part of the New Communities Initiative (NCI).
DC001001650 Judiciary House	263	DCHA received a RAD CHAP for Judiciary House in FY2021, with anticipated closing in FY2024. 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.
DC001004430 Potomac Gardens (Family and Senior Mid-Rise)	208	DCHA received a RAD CHAP for Potomac Gardens family and senior midrise in FY2021, with anticipated closing in FY2023. 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.
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.



Planned Public Housing Units to be Removed During the Plan Year		
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
DC001005200 Henson Ridge	68	DCHA applied for a RAD CHAP for Henson Ridge in FY2023, with anticipated closing in FY2024.
DC001001600 Claridge Towers	343	DCHA may apply for a RAD CHAP for Claridge Towers in FY2023, with anticipated closing in FY2024.
DC001001370 Garfield Family	279	DCHA may apply for a RAD CHAP for the 228 units at Garfield Senior in FY2024, with anticipated closing in FY2025. DCHA also plans for a section 18 Demo/Dispo application in FY2024 for the 51 units in the Garfield Family Walk-Up Buildings.
DC001004210/ DC001003363 Greenleaf Gardens/Addition/ Extension/Senior	493	DCHA plans to initiate a phased Section 18 Demo/Dispo application for the units at Greenleaf Gardens, Extension and Addition in FY2022. Greenleaf will be redeveloped into mixed-income housing. DCHA plans to apply for a RAD CHAP for Greenleaf Senior (211 units) in FY2024, with the earliest anticipated closing in FY2025.
DC001001620 Horizon House	124	DCHA plans to apply for a RAD CHAP for Horizon House in FY2023, with anticipated closing in FY2024.
DC001001030 James Creek	239	DCHA plans to apply for a RAD CHAP for James Creek in FY2023, with anticipated closing in FY2024.
DC001001080 Kelly Miller	160	DCHA may apply for a RAD CHAP for the 40 units at the Kelly Miller (Townhomes) in FY2024, with anticipated closing in FY2024. DCHA also plans for a section 18 Demo/Dispo application in FY2024 for the 120 units in the Kelly Miller Walk-Up Buildings.
DC001001391 LeDroit	124	DCHA may apply for a RAD CHAP for the 106 units at LeDroit Senior in FY2024, with anticipated closing in FY2024. DCHA also plans for a phased section 18 Demo/Dispo application in FY2024 for the 18 units in the LeDroit Walk-Up Building.
DC001002250 Langston Terrace	274	DCHA may apply for a RAD CHAP for Langston Terrace in FY2024, with anticipated closing in FY2025.
DC001002400 Langston Additions	34	DCHA may apply for a RAD CHAP for Langston Additions in FY2024, with anticipated closing in FY2025.
DC001002130 Lincoln Heights/Richardson	631	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 plans to remove additional units 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.



Planned Public Housing Units to be Removed During the Plan Year		
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
DC001004430 Potomac Gardens (low-rise 3 story family buildings)	144	DCHA is evaluating a pathway for the low-rise 3-story family buildings at Potomac Gardens, and may opt to apply for a RAD CHAP or Section 18 Demo/Dispo application for these 144 units in FY2024.
DC001005480 Bixby (Formerly known as The Lofts)	39	As per Initiative #25 DCHA will work with HUD to convert the projects to 39 traditional public housing units to PBVs; or utilize the Rental Assistance Demonstration (RAD) or similarly structured program permitted by HUD.
DC001003530 Highland Dwellings	208	As per Initiative #25 DCHA will work with HUD to convert the projects to 208 traditional public housing units to PBVs; or utilize the Rental Assistance Demonstration (RAD) or similarly structured program permitted by HUD.
DC001005230 Capitol Gateway	212	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 & 61 of the 86 units at Capital Gateway Family are public housing units. DCHA may apply for a RAD CHAP for FY2024.
DC001005520 Capper Senior I	162	DCHA will apply for a RAD CHAP for the 162 units at Capper Senior I in FY2024 with anticipated conversion in FY2024. The property was newly constructed in FY2020 and does not require additional financing or renovation.
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 plans to apply for a RAD CHAP for FY2024.
Total Number of Units to be Removed	4,826	

* DCHA originally received CHAP approval for a total of 140 units for the MELVO RAD sites to be converted. This number was revised to 136 as part of an amended CHAP.

New Communities Initiative (NCI) Sites

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.

After several years of proceedings, the PUD was withdrawn after agreeing to pursue map/text amendment zoning approval. The Zoning Commission approved a Map & Text Amendment on December 16, 2021. 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 55 years and older preference is under construction and is expected to be delivered in FY2024. There will be 77 replacement units at the Asberry for former Barry residents. The next building will be a 139-unit multifamily building with 50 replacement units targeted for former Barry Farm residents. This building is expected to begin construction in FY2023.

Lincoln Heights and Richardson Dwellings—The redevelopment of Lincoln Heights and the neighboring Richardson Dwellings public housing sites is envisioned to include approximately 1,000 units of new housing. In anticipation of the redevelopment, 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 choice 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.

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 in early FY2025. 40 replacement units will be targeted to former Park Morton residents.

Sursum Corda and Sibley Townhomes—These two properties are adjacent to the Northwest One boundary under the District’s Northwest One Redevelopment Plan for New Communities. DCHA intends to redevelop the sites identified as part of the Northwest One plan. The demolition/disposition application was approved in 2019. An RFP was re-issued for a co-developer for Sibley Townhomes in FY2023 and another for Sursum Corda will follow. DCHA also plans to request a disposition of the parking lot at Sibley Plaza in FY2023 to include as part of the redevelopment of for Sibley Townhomes.

3. Planned New Project-Based Vouchers

Property Name*	Number 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.
Judiciary House	263	Yes	DCHA received a RAD CHAP for Judiciary House in FY2021, with anticipated closing in FY2024. 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.
Kenilworth Phase I	101	Yes	As part of the Kenilworth redevelopment, DCHA anticipates project basing up to 101 units as part of the first phase of the new construction redevelopment using Faircloth to RAD. DCHA expects 166 units to come online during phase one, including 118 total replacement units (17 to receive subsidy through the Districts Local Rent Supplement Program, LSRP). DCHA received an RCCA for this project from HUD in FY2022.
Potomac Gardens (Family and Senior Mid-Rise)	208	Yes	DCHA received a RAD CHAP for Potomac Gardens family and senior midrise in FY2021, with anticipated closing in FY2023. 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.
Barry Farm	44	Yes	As part of the Barry Farm redevelopment, DCHA anticipates project basing up to 44 units as part of the first phase of the new construction redevelopment using Faircloth to RAD. DCHA expects 108 units to come online during phase one, including 77 total replacement units. DCHA received an RCCA for this project from HUD in FY2022.
Park Morton	40	Yes	As part of the Park Morton redevelopment, DCHA anticipates project basing up to 40 units as part of the first phase of the new construction redevelopment using Faircloth to RAD. DCHA expects 142 units to come online during phase one, including 40 total replacement units. DCHA received an RCCA for this project from HUD in FY2023.
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.
Henson Ridge	68	Yes	A DCHA HOPE VI site, Henson Ridge is a mixed finance property which includes 68 public housing units. DCHA applied for a RAD CHAP in FY2023.



Property Name*	Number of Vouchers to be Project-Based	RAD? ** (Yes or No)	Description Of Project
Capper Senior I	163	Yes	DCHA plans to apply for a RAD CHAP for Capper Senior in FY2023, with anticipated closing in FY2024.
Friendship Terrace	140	No	DCHA accepted HUD's invitation to administer 140 enhanced vouchers for households impacted by Friendship Terrace opt-out decision. DCHA anticipates converting the 140 enhanced vouchers to project-based vouchers.
2 ND Northwest Cooperative	99	No	DCHA accepted HUD's invitation to administer 99 enhanced vouchers for households impacted by Second Northwest Cooperative #17's opt-out decision.
Foster House	31	No	DCHA accepted HUD's invitation to administer 31 tenant protection vouchers for households impacted by Foster House Apartments' opt-out decision.
Total	1,441		

*Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year.

**Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

***Originally, DCHA received CHAPs for a total of 140 units for the RAD sites to be converted. This number was revised to 136 as part of an amended CHAP.

In FY2024, DCHA anticipates converting up to 986 public housing units to project based vouchers (PBV) under the Rental Assistance Demonstration (RAD) program. DCHA anticipates entering an Agreement to enter into a Housing Assistance Payment (AHAP) through Faircloth to RAD for up to an additional 185 units at the Barry Farm (44 units), Park Morton (40 units), and Kenilworth Phase 1 (101 units) redevelopment sites using Faircloth to RAD. Finally, DCHA anticipates adding 270 new PBV by administering opt-out decisions.



4. Planned Existing Project Based Vouchers*

	Property Name	Number of Project Based Vouchers	Planned Status as the End of the Plan Year**	RAD? (Yes or No)	Description of Project
1	Meridian	34	Leased	No	Family
2	Edgewood Senior	38	Leased	No	Senior
3	2008 3rd Street	11	Leased	No	Family
4	Chapin House	15	Leased	No	Family
5	Euclid	17	Leased	No	Family
6	Weinberg House	6	Leased	No	Family
7	First Street	12	Leased	No	Family
8	Soho	4	Leased	No	Family
9	Beacon House—Good Hope Road	15	Leased	No	Family
10	Kenyon	12	Leased	No	Family
11	Champlain	28	Leased	No	Family
12	Shalom House	89	Leased	No	SRO
13	Green Door	4	Leased	No	Family
14	Capital Gateway Senior	151	Leased	No	Senior
15	Robert Walls Senior	47	Leased	No	Senior
16	Henson Ridge	92	Leased	No	Senior
17	Oxford Manor	3	Leased	No	Family
18	Carver Terrace	103	Leased	No	Senior
19	Accessibuild 22 – DCHA	22	Leased	No	Family
20	Beacon House	13	Leased	No	Family
21	JW King	74	Leased	No	Senior
22	St. Paul – Wayne Place Senior	49	Leased	No	Senior
23	Birchmere Homes, LLC	2	Leased	No	Family
24	Fairlawn	10	Leased	No	Family
25	The Overlook	201	Leased	No	Senior/Family
26	Affordable Housing Corporation of the District of Columbia	1	Leased	No	Family
27	Crawford – Bethune House	20	Leased	No	Family
28	Edgewood – Wheeler Terrace	4	Leased	No	Senior
29	Williston	28	Leased	No	Family
30	Edgewood – Gregory	50	Leased	No	Family
31	Kenilworth	132	Leased	No	Family
32	Beacon House	10	Leased	No	Family
33	Community Connections – North Carolina	12	Leased	No	Family
34	SOME – Independence Place	21	Leased	No	Family
35	Charles Thorton	2	Leased	No	Family
36	Bourne Enterprise, LLC	1	Leased	No	Family
37	St. Martin	10	Leased	No	Family



	Property Name	Number of Project Based Vouchers	Planned Status as the End of the Plan Year**	RAD? (Yes or No)	Description of Project
38	Fendall Height – SOME	29	Leased	No	VASH
39	SOME – Griffin House	1	Leased	No	Family
40	VIDA Senior	9	Leased	No	Senior
41	Ernestine	2	Leased	No	Family
42	Kulipe	1	Leased	No	Family
43	Gibson Plaza	20	Leased	No	Family
44	WC Smith – 1320 Mississippi Ave	19	Leased	No	Family
45	St. Dennis – 1636 Kenyon St	8	Leased	No	Family
46	NCC – VASH	60	Leased	No	VASH
47	Mi Casa – Intergenerational	20	Leased	No	Intergenerational
48	Columbia Road/Colorado Road	44	Leased	Yes	Family
49	Matthews Memorial	35	Leased	Yes	Family
50	Fairlawn Marshall	30	Leased	Yes	Family
51	Conway Center	20	Leased	No	SRO
52	St. Stephens	18	Leased	No	Family
53	Parkway Overlook	105	Leased	No	Family
TOTAL		1,764			

*Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

**Select “Planned Status at the End of the plan Year” from: Committed, Leased/Issued.

5. Planned Other Changes to MTW Housing Stock Anticipated during the Plan Year

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 FY2024 to the Agency's public housing stock and related properties.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR				
Elderly and Non-Elderly Disabled Designation and/or Preference: The agency will pursue an elderly or mixed population designation and/or elderly preference for the properties below to allow for elderly and non-elderly disabled families to reside in specific units. This mirrors the current population in these developments.				
DCHA has 8,026 public housing and of those 2,849 will be allocated for elderly and non-elderly disabled families. Below is the list of properties at which DCHA plans to designate and/or implement an elderly preference:				
Property Name	# of Units to Designate	Designated by Bedroom Size		
		OBDR	1BDR	2BDR
Capper Senior	162	0	155	7
Carroll Apartments	60	0	60	0
Claridge Towers	343	285	58	0
Edgewood Terrace Seniors Development Senior	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 Faircloth to RAD)	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	79	2	0
Choice Neighborhoods Initiative (CNI) Grants/Federal Revitalization Grants: If CNI is funded by HUD in the FY2024 budget, DCHA may submit a CNI implementation grant application to help achieve the agency's redevelopment goals to revitalize public housing. In addition, DCHA will evaluate submitting a planning grant application. DCHA received a CNI grant for Lincoln Heights/Richardson Dwellings in FY2022 and previously received CNI grants for Kenilworth Courts and Barry Farm/Wade Apartments.				
Rental Assistance Demonstration (RAD): DCHA anticipates using RAD as a tool to fund capital needs at DCHA properties within the senior portfolio and the family portfolio. Sites that may be considered for conversion or transfer to RAD				



subsidy include: Benning Terrace, Harvard Apartments, Carroll Apartments, Claridge Towers, Horizon House, James Creek, Potomac Gardens, LeDroit Park Apartments, Kelly Miller Apartments, Langston Terrace and Additions, Stoddert Terrace, Ft. DuPont Dwellings, Garfield Terrace, Woodland Terrace, Sibley Senior, Barry Farm, Kenilworth Courts, Park Morton, and Greenleaf. DCHA has also received interest from owners of mixed finance properties to convert ACC units in those properties to RAD. These properties include The Bixby, Highland Dwellings, Wheeler Creek, Edgewood Terrace, Capitol Gateway Family & Senior, Capper Senior I, Glenncrest, Triangle View, Henson Ridge, and Nannie Helen. DCHA received a RAD Conversion Conditional Approval (RCCA) for 101 Faircloth to RAD units for Kenilworth 166 and 44 units for Barry Farm 108 in FY2022 and 40 units for Park Morton Phase 1 in FY2023. DCHA also received RAD CHAPs for Judiciary House and Potomac Gardens Senior and Family Midrise and Wheeler Creek in FY2022. The agency is considering additional use of Faircloth to RAD, particularly in areas where public housing units may have already been removed. DCHA anticipates using Faircloth to RAD at for the future phases of redevelopment in FY2024 for Park Morton, Barry Farm, Kenilworth, Sursum Corda and Sibley Townhomes and the Capper parcels.
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 lease or transfer the developments to other entities that would have access to funds necessary for development not available to DCHA.
Changes to DCHA Owned Land
Land Exchange: DCHA received HUD approval of a land exchange in FY2014 to exchange a portion of the DCHA owned parcel at the Montana Terrace site with the owner of an adjacent vacant parcel of land. The owner has committed to creating three homeownership units, with one unit to be made available for purchase by a Public Housing resident.
Capitol Gateway Urban Farm: At the Capitol Gateway HOPE VI Site there is approximately 5-6 acres which will be developed as a mixed-use development in future years. Most recently, DCHA has partnered with the University of the District of Columbia (UDC) to use the site as an urban farm and farmers market on an interim basis while redevelopment plans are formalized.

As part of DCHA's comprehensive portfolio investment plan, DCHA may apply for Section 18 demolition/disposition 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 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.
DC001001370 Garfield Family	51	DCHA plans for a section 18 Demo/Dispo 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 looks to submit a RAD/Section 18 Blend for the Greenleaf Senior (211 units) property and then a demolition and/or disposition application for the remainder of the site as the units are considered distressed and obsolete housing. Potential future uses 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.
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.
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.



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
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.
	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.
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	

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

The following outlines the projected planned capital expenditures for FY2024. In light of continued federal underfunding of DCHA's capital needs, the ongoing challenge for the Agency is identifying priorities when faced with more need than funding to address an aging Public Housing portfolio (also see Planned Application of MTW Funds section). The District continues to generously support our public housing developments – the Mayor's FY2024 budget provides DCHA with \$115 million for the capital budget in the next two years.

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR
The following describes the general planned capital fund expenditures for fund year FY2023 for the following developments: <u>Richardson Dwellings</u>: \$1,800,000 for replacing hydronic baseboard radiators. <u>Stoddert Terrace</u>: \$3,600,000 for full electrical system upgrade. <u>Syphax Gardens</u>: \$2,220,000 for full electrical system upgrade. In addition to hard-rehab costs, expenditures are planned to cover front line costs at various properties related to architectural and engineering fees (\$1,000,000) and various repairs and emergencies (\$489,000). DCHA has also budgeted for demolition (\$650,000) and resident relocation for the planned activities above as well as for abatement and interim controls related to DCHA's ongoing environmental mitigation strategies (\$349,985.80). The total net grant value for the DCHA Capital Fund Budget is \$10,108,985.80.
Planned FY2024 Expenditures of Unexpended Funds from Previous Grant Years: CFP-501-19 (\$1,864,079)—unit renovation, interim controls for lead-based paint testing, abatement, inspections and relocations, mechanical systems upgrade, fire alarm system replacement, LED lighting installation, RAD Funds for pre-development and closing; and resident relocation. CFP-501-22 (\$14,254,768)—unit renovation, interim controls for lead-based paint testing, abatement, inspections and relocations, mechanical systems upgrade, fire alarm system replacement, LED lighting installation, RAD Funds for pre-development and closing; and resident relocation.

B. Leasing Information

1. Planned Number of Households Served

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.

Planned Number Of Households Served Through	Planned Number Of Unit Months Occupied/Leased*	Planned Number Of Households To Be Served**
MTW Public Housing Units Leased	71,928	5,994
MTW Housing Choice Vouchers (HCV) Utilized	128,904	10,742
Local, Non-Traditional: Tenant-Based^	NA	NA
Local, Non-Traditional: Property-Based^	NA	NA
Local, Non-Traditional: Homeownership^	NA	NA
TOTAL	200,832	16,736

* "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	NA	NA	NA
Property-Based	NA	NA	NA
Homeownership	NA	NA	NA

* 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	DCHA is experiencing significant challenges with refusals, largely due to applicants preferring larger bedroom sizes when offered zero-bedroom units, safety concerns, and a general preference for vouchers. DCHA's updated waitlist policies and procedures, adopted in FY2023, will address these concerns by implementing a site-based, lottery system with current applicant information.
MTW Housing Choice Voucher	With annual attrition and the competition for units created by the Local Rent Supplement Program (local voucher program), DCHA may be faced with some challenges leasing HCV units in FY2024. DCHA will be working aggressively to recruit additional landlords to the program by increasing marketing of the voucher program and hosting multiple monthly landlord recruitment events. DCHA will also explore additional MTW flexibilities focused on attracting new landlords into the program. DCHA's ability to lease additional HCV units is limited by funding as the agency balances voucher utilization with the need to set payment standards higher than 110% of HUD FMRs in response to the city's high housing costs and supporting mission-critical agency functions, including modernizing and operating public housing and providing resident services. To expedite eligibility determinations, DCHA has rigorously updated contact information for waitlist clients and contracted a vendor to build a pool of eligible applicants.
Local, Non-Traditional	NA



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
Federal MTW Public Housing	Site-based	DCHA cannot accurately project the size of its site-based waiting lists for FY2024 at this time. Please see the note about changes for information about the switch from a community-wide to site-based waiting list.	Varies by Site	Will vary by site
Federal MTW Housing Choice Voucher (Tenant-based and Project-based)	Community-wide	33,127	Closed	No
Federal Moderate Rehabilitation	Community-wide	20,989	Closed	No
Federal MTW Public Housing (Mixed Finance)	Site-based	4,182	Varies by Site--DCHA has various mixed finance sites that have site- based wait lists. Each site makes decisions about the need to open or close their respective wait lists.	Will vary by site

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. Across the three DCHA-managed community-wide waiting lists, the total, unduplicated number of applicants is 36,971.



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
Federal MTW Public Housing	After exhausting the community-wide waitlist in FY2023, DCHA plans to open site-based waiting lists in summer 2024. 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 via <i>The Washington Post</i> Sunday Edition, other minority media and the DCHA website. DCHA will select applicants from the site-based waiting lists based on date and time of application and the type of unit available.
Federal MTW Housing Choice Voucher	As begun in FY2023, DCHA will select families from the waiting list based on date and time of application. DCHA plans to begin collecting information about interest in PBV sites.
Federal non-MTW Housing Choice Voucher Units (Moderate Rehabilitation)	This waitlist is managed in accordance with the policies outlined for Federal MTW Housing Choice Vouchers.
Federal non-MTW Housing Choice Voucher Units (Tenant-Based and Project-based)	This waitlist is the same as the Federal MTW Housing Choice Voucher waitlist.
Federal MTW Public Housing (Mixed Finance)	No changes are anticipated for FY2024.



Section III. Proposed MTW Activities

A. Summary of Proposed MTW Activities (NEW): HUD Approval Requested

DCHA is proposing the following new initiative for approval as part of the FY2024 MTW Plan.

Initiative #	Initiative/Activity	Statutory Objective	Original Year Identified/Year Implemented	Authorization(s) Existing/Additional
35	Elderly Families and the Project Based Voucher (PBV) Program	• Increase housing choices for low-income families	FY2024	Attachment C, Section C(3)



Initiative 35: Local Elderly Family Definition

Description

Using MTW flexibility, DCHA proposes this new, local definition of “elderly”: any family whose head of household, co-head, or spouse is age 55 or above.

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 Faircloth-to-RAD conversion process.

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

Meets Statutory Objective/Impact

Increase housing choice for low income families.

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.

Anticipated Implementation Schedule

DCHA anticipates implementing this initiative in public housing sites, RAD conversions, and PBV transactions, including asreferrals are made to the owners of units in project-based buildings with an elderly preference.

Metrics

HUD Standard Metric(s)

HC #3: Decrease in Wait List Time				
Unit of Measurement	Baseline (FY2023)	Benchmark	Outcome (FY2024)	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months).	Expected average applicant time on wait list after implementation of the activity (in months).	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark
Average elderly (55+) applicant time on wait list in months (decrease).	TBD	TBD	To be provided in the MTW Annual Reports after policy implementation	To be provided in the MTW Annual Reports after policy implementation

Housing Choice #5: Increase Resident Mobility



Unit of Measurement	Baseline (FY2023)	Benchmark	Outcome (FY2024)	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity	Actual increase in the households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity	Whether the outcome meets or exceeds the benchmark
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	0	227	To be provided in the MTW Annual Reports after policy implementation	To be provided in the MTW Annual Reports after policy implementation

Data Source

DCHA program management software—Wizard/Yardi Voyager

Authorization

Under Section B.3 of Attachment C of the MTW Agreement, DCHA is authorized to amend the definition of elderly to include families with a head of household or family member who is at least 55 years old and must be in compliance with all Fair Housing Requirements, in particular the Housing for Older Persons Act of 1995. *This authorization waives certain provisions of Section 3 (b)(3) and (G) of the 1937 Act and 24 C.F.R. 5.403 as necessary to implement the Agency's Annual MTW Plan.*

The Agency must be in compliance with all Fair Housing Requirements, in particular the Housing for Older Persons Act of 1995.



B. Summary of Re-Proposed MTW Activities: HUD Approval Requested

DCHA is re-proposing the following initiative as part of the FY2023 MTW plan.

Initiative #	Initiative/Activity	Statutory Objective	Original Year Identified/Year Implemented	Authorization(s) Existing/Additional
3	Modifications to HCV Homeownership Program	• Reduce cost and achieve greater cost effectiveness • Increase housing choices for low- income families	FY2004 & FY2016 & FY2019	Attachment C, Sections C11, D2, D8, D1b, D8a, and E
8	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	Attachment C, Section D2
11	Site-based In-take and Waiting List Management of Public Housing, Redeveloped Properties and Service Rich Properties	• Reduce cost and achieve greater cost effectiveness • Increase housing choices for low- income families	FY2004	Attachment C, Sections C1, C9b, C10, C11, and D4
		•		
25	Local Blended Subsidy (LBS)	• Reduce cost and achieve greater cost effectiveness • Increase housing choices for low-income families	FY2013	Attachment C, Section B1; Attachment D, Uses of Funds

Initiative 3: Modifications to HCV Homeownership Program (formerly 1.4.04)

Description/Update

As part of DCHA's efforts to develop new housing opportunities for low-income families that promote self-sufficiency, the Agency explored and implemented various modifications to its HVC

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;
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 (HOAP)

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

- Rather than establishing no minimum downpayment 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 (HOAP for households paying 100% of contract rent)

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 FY2024.

Planned Significant Changes for FY2024

DCHA is closing the Achieving Your Best Life Rewards (AYBL) portion of this initiative. DCHA is closing this place-based, public housing homeownership program as the program model is no longer viable. Both AYBL public housing communities have either converted to RAD or will convert. Additionally, public housing residents now have opportunities to work toward homeownership under Initiative 32. All former AYBL participants completed their contract terms, received required notices, and have passed their grievance periods. A total of 11 families purchased homes through AYBL. An unexpected outcome of AYBL was that none of the homeowners utilized a voucher to purchase their homes.



Anticipated Impacts, including Cost Implications

DCHA does not anticipate any impact to participants since all AYBL participants completed their contract terms, and in FY2022, the remaining families received contract extensions to provide additional time and resources they did not fully receive during the pandemic.

Statutory Objectives

Increase housing choices for low- income families.

Anticipated Implementation Plan

N/A

Planned Changes to Metrics/Data Collection

DCHA is removing the metrics related to AYBL since the program is closing. A brief summary of AYBL's outcomes is mentioned in the planned significant changes section and the outcomes by fiscal year are listed in the table below.

DCHA/ HUD Metric	Metric	Baseline	Outcome											
		FY11	FY12	FY13	FY14	FY15	FY16	FY17	FY18	FY19	FY20	FY21	FY22	Total
DCHA Defined Metric	Number of families enrolled in AYBL	0	11	11	14	14	16	14	13	9	8	7	0	16 at peak
DCHA Defined Metric	Number of HOAP vouchers issued to Public Housing families through AYBL	0	0	0	0	0	0	0	0	0	0	0	0	0
DCHA Defined Metric	Number of AYBL families purchasing homes	0	0	0	0	2	4	2	1	0	0	1	1	11
DCHA Defined Metric	Number of AYBL families renting in the private market	0	n/a	n/a	0	0	0	0	0	0	0	0	0	0
HUD SS #1	Average earned income of households affected by this policy in dollars (increase)	\$35,000	n/a	n/a	\$43,816	\$37,210	n/a	\$42,368	\$43,409	\$35,108	\$27,663	\$48,598	0	\$39,739



DCHA/ HUD Metric	Metric	Baseline	Outcome											
		FY11	FY12	FY13	FY14	FY15	FY16	FY17	FY18	FY19	FY20	FY21	FY22	Total
HUD SS #2	Average amount of savings/ escrow of households affected by this policy in dollars (increase)	0	n/a	n/a	\$2,465	\$2,057	n/a	\$950	\$2,052	\$2,316	\$803	\$297	0	\$1,563
HUD SS #5	Number of households receiving services aimed to increase self-sufficiency (increase)	0	n/a	n/a	14	16	16	16	13	9	8	7	0	16 at peak
HUD SS #8	Number of households transitioned to self-sufficiency households becoming homebuyer s or renting in the private market (increase)	0	n/a	n/a	0	2	4	2	1	0	0	1	1	11
HUD HC #6	Number of households that purchased a home as a result of the activity	0	n/a	n/a	0	2	4	2	1	0	0	1	1	11

Initiative 8: Modifications to Methods for Setting Total Tenant Payments and Determining HCV Market Rents and Promoting Deconcentration (formerly 1.6.05 & 3.8.10)

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:

- Established a new method for setting 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.

Status

Implemented and Ongoing

DCHA continues to garner administrative efficiency by limiting moves so the new lease can only start on the first of the month.

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

Planned Significant Changes for FY2024

DCHA is closing the rent reasonableness portion of this initiative whereby the agency conducted market analysis to set reasonable rents by submarket. Instead, the agency is procuring 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). The Administrative Plan updates to accompany this change were approved by DCHA's Board of Commissioners in April 2023 and full implementation of the new procedures is expected to be complete in Summer 2023.

Anticipated Impacts, Including Cost Implications

Without the data DCHA did not collect from landlords while using its approved submarket methodology, DCHA is unable to fully assess the potential impact of this methodology change.

Statutory Objectives

Reduce cost and achieve greater cost effectiveness and increase housing choices for low- income families.

Anticipated Implementation Plan

DCHA intends to implement the new rent reasonableness methodology at initial lease up and/or upon an owner's request for a rent increase. Additionally, DCHA is in the process of assessing its previously set rents.

Planned Changes to Metrics/Data Collection

DCHA is removing the metrics related to rent reasonableness, as listed in the table below. All benchmarks were achieved by 2014. Additionally, DCHA is evaluating additional metrics related to payment standards and intends to update its metrics in the FY2023 MTW Report.

DCHA/ HUD Metric	Metric	Baseline	Outcome Achieved
		FY10	By FY14
DCHA Defined Metric	Number of rent reasonableness analyses conducted at lease-up and rent increase processing	2,161	0



DCHA Defined Metric	Staff time to conduct rent reasonableness analyses	2,269 hours	0
DCHA Defined Metric	Dollars spent on comp analysis	\$6,483 (\$3 per analysis x 2,161 analyses)	\$0
HUD CE #1	Total cost of task in dollars (decrease)	\$6,483 (\$3 per analysis x 2,161 analyses)	\$0
HUD CE #2	Total time to complete rent reasonable analyses in staff hours (decrease)	360 hours/year (10 minutes per analysis x 2,161 analyses)	0

Initiative 11: Site-based In-take and Waiting List Management of Public Housing and Redeveloped Properties (formerly 1.10.06, 2.5.04, 3.9.12 & 22)

Description/Update

Due to the close relationship of Initiative 11 (*Applicant Intake Site Designation/ Revised Site-Based Waiting List Policies and Procedures*—formerly 1.10.06, 2.5.04) and Initiative 22 (*Housing Public Housing Residents in Service-Rich Environments*—formerly 3.9.12) with respect to the “Special Purpose” sites and “Service Rich” units, these initiatives were combined. In addition, the name of the combined initiatives better reflects the activities being undertaken. When closing the “Service Rich” portion of the initiative in FY2024, this portion of the name was removed.

Redeveloped Properties are mixed-finance communities owned by private entities which communities are created through HOPE VI or other public funding combined with private financing, which have some or all of their units assisted by operating funds provided by DCHA. These properties have site specific in-take and waiting list management policies and procedures.

This initiative also includes the establishment of centrally managed site-based waiting lists at DCHA’s conventional Public Housing sites.

Status

Implemented and Ongoing.

After selecting over 21,000 applicants from the community-wide waitlist in FY2023, DCHA plans to open site-based waiting lists in 3rd Quarter 2024. 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 via *The Washington Post* Sunday Edition, other minority media and the DCHA website. DCHA will select applicants from the site-based waiting lists based on date and time of application and the type of unit available.

Planned Significant Changes for FY2024

DCHA is closing the service rich portion of this initiative whereby the agency created supportive, service-intensive sites that serve special needs populations in partnership with service providers who bring additional funding to create these service-rich environments, such as Medicaid. DCHA had implemented this initiative at a converted 14-unit building assisted living site called the Marigold (2905 11th Street NW).

Anticipated Impacts, including Cost Implications

After facing significant operating challenges with the original operator and additional occupancy challenges from the pandemic, DCHA worked closely with the most recent operator to assess the site’s financial viability. In 2023, DCHA closed the facility based on this analysis and expanded affordable, assisted living options in the District. DCHA worked closely with each of the remaining eight residents to



ensure a smooth transition to new housing.

Statutory Objectives

Reduce cost and achieve greater cost effectiveness and increase housing choices for low-income families.

Anticipated Implementation Plan

N/A

Planned Changes to Metrics/Data Collection

DCHA is removing the metrics related to the Marigold. The table below summarizes the metrics from the years the Marigold operated.

DCHA/ HUD Metric	Metric	Baseline	Outcome									
			FY14	FY15	FY16	FY17	FY18	FY19	FY20	FY21	FY22	Average
DCHA Defined Metric	Number of residents served by service rich unit	0	11	14	14	12-15	9	8	8	8	7	10
DCHA Defined Metric	Investment in services using non-DCHA funds	\$0	\$4,560	not available	\$316,399	\$221,805	\$0	\$414,870	\$114,000	\$530,852	\$560,876	\$270,420
DCHA Defined Metric	# of residents that do not have to enter/stay in nursing home/institution - maintaining greater independence	0	11	14	14	12-15	9	8	8	8	7	10
HUD CE #4	Amount of funds leveraged in dollars (increase)	\$0	\$4,560	not available	\$316,399	\$221,805	\$628,100	\$414,870	\$462,699	\$530,852	\$560,876	\$392,520
HUD HC #1	# of housing units made available for households at or below 80% AMI as a result of the activity (increase)	0	14	14	14	14	9	8	8	8	7	11
HUD HC #4	# of households at or below 80% AMI that would lose assistance or need to move (decrease)	0	3	0	0	0	8	8	8	8	7	5



DCHA/ HUD Metric	Metric	Baseline	Outcome									
			FY14	FY15	FY16	FY17	FY18	FY19	FY20	FY21	FY22	Average
HUD HC #7	# of households receiving services aimed to increase housing choice	0	11	14	15	15	8	8	8	8	7	10

Initiative 25: Local Blended Subsidy

Description

Overview

For over a decade, the District of Columbia Housing Authority (DCHA) has undertaken an aggressive redevelopment program to both replace and revitalize its public housing. As DCHA continues its efforts to replace units demolished and disposed of, as well as reconstruct existing functionally and physically obsolete housing, it intends to use its MTW authority to improve its ability to leverage public and private investment in order to meet its capital improvement needs. With diminished appropriations to support the management, operation and long term capital replacement requirements of public housing, it is critical that effective approaches to financing development and redevelopment of public housing communities be created to replace losses in public funding. Accordingly, DCHA proposes in certain cases to blend 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. Public housing authorities have long used Project Based Vouchers (PBVs) in a similar manner, but DCHA proposes using a more efficient, effective and targeted approach using MTW authority through a Local Blended Subsidy (LBS) Program.

DCHA is flexible in its approach to using LBS to both upgrade and redevelop certain existing public housing sites, as well as to create new replacement housing. The LBS is targeted to 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 a the combination of different housing types.

As a part of the analysis, DCHA reviews comparable properties to assist in determining budgets that are reasonable and appropriate for the housing being operated as well as the characteristics of the households being served. The approach is to structure the LBS where it uses comparable standards which approximate the PBV program and/or offer a total expense level which creates no “overhang” in the total aggregate amount of MTW funds being provided (compared to LIHTC and/or market rent levels) so as to minimize reserve requirements while maximizing permanent debt and equity commitments as well as in some cases, the level of cross subsidization from privately financed unassisted units within the same development. The high amount of leverage obtained for these



redevelopment projects is evidenced in the financing proposals submitted to HUD which also reflects that LBS is being used in a manner which minimizes risk to DCHA.

DCHA recognizes any project for which LBS is utilized will need to be subjected to a Subsidy Layering Review (SLR) or other appropriate analysis by HUD. Given DCHA's experience with The Lofts and Highland, DCHA is confident that any future projects will meet HUD's subsidy layering review and analysis requirements.

DCHA has developed an extraordinary capability in the development and redevelopment of its public and assisted housing. It intends to pursue both co-development (with private and non-profit partners) and self-development using LBS. In pursuing these types of programs, DCHA has and will continue to develop direct relationships with lenders and investors. Moreover, in making commitments for these projects, DCHA has developed a formalized structure for minimizing any risks in these transactions to DCHA through an effective use of affiliates (instrumentalities) in the development and ownership structure. Further, to help insure the integrity and transparency of this process, DCHA has instituted a formal review process that is overseen by an investment committee which approves each of these types of development transactions whether or not LBS is utilized.

DCHA understands the following as it relates to the key aspects of utilizing MTW authority in this way:

- The authority to combine subsidies would only last through the term of the MTW Agreement. If the MTW Agreement expires, DCHA will work with HUD pursuant to the MTW Agreement to have this initiative extended; commit to convert the projects to traditional public housing or seek to convert some or all of the units to PBVs; or utilize the Rental Assistance Demonstration (RAD) or similarly structured program permitted by HUD.
- DCHA ensures all financial partners are aware of the subsidy structure and the implications of using this financial model. This would be evidenced in the financing documents as appropriate or a signed document.
- DCHA is subject to the traditional process required under 24 CFR 905, Subpart F and anticipates that any debt structure would be subject to HUD review as HUD deems appropriate. DCHA further understands that LBS would have an impact on the Replacement Housing Factor (RHF) funds received and there are limitations for using capital funds for debt service.
- Where LBS results in adding public housing units, this would increase the agency baseline.
- If subsidies are combined within one unit, the unit would be considered public housing for purposes of regulatory compliance.

DCHA's LBS is intended to increase housing choice for low income families and to provide housing of improved quality and type for low income families.

DCHA received approval for LBS flexibility for six projects:

- Highland (approved as part of FY2014 MTW Plan)
- The Bixby (approved as part of FY2014 MTW Plan)
- Park Morton/Bruce Monroe (approved as part of FY2019 Plan)
 - Two sites that are a part of the overall development of Park Morton
- 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 plan, DCHA is removing all properties except those already implemented: Highland and the Bixby.

The following provides descriptions and statuses of the LBS projects.

Initial Projects Completed Using LBS (Highland & The Bixby (formerly known as The Lofts))

- **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 Lofts, 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: Highland and The Bixby

Removed from initiative in FY2024 Plan: Bruce Monroe/Park Morton, Kenilworth Courts Phase 1, Barry Farm and Sursum Corda Turnkey and Sibley Townhomes

Planned Significant Changes for FY2024

DCHA is removing the properties that have not yet implemented this initiative: Bruce Monroe/Park Morton, Kenilworth Phase 1, Barry Farm, Sursum/Sibley. This initiative pre-dated HUD's Faircloth to RAD conversion tool, and DCHA finds the flexibility granted by LBS is not necessary beyond those for which it has already been implemented.

Rather than blending funds to fully fund public housing operations, DCHA will use its single fund fungibility to increase the base value of vouchers during and after the paper transition from brand new public housing units to RAD PBV units.

Anticipated Impacts, including Cost Implications

There are no anticipated impacts of this change since DCHA had originally planned to use Faircloth to RAD at the sites being removed. Rather, DCHA is aligning its administrative approach with the standard practice of indicating the use of MTW single-fund flexibility for this type of transaction.

Statutory Objective(s)

Increasing housing choices for low-income families.

Anticipated Implementation Plan

N/A

Planned Changes to Metrics/Data Collection

Since the projects remaining under this initiative are complete, the related benefits are in the past. There are no further metrics to report on this initiative.

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. Implemented Activities

Table IV.1 Summary of MTW Activities/Initiatives

New Number	Old Number	Activity	Statutory Objective	Yr. Identified	Yr. Implemented
1	1.1.04; 1.5.05; 1.9.06	Modification to DCHA's Project-Based Voucher Program	Increase housing choices for low-income families	FY2004; FY2005 & FY2006	FY2004; FY2005 & FY2006
4	2.1.04	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 & FY2016	FY2004
7	4.1.04	DCHA Subsidiary to Act as Energy Services Company	Reduce cost and achieve greater cost effectiveness	FY2004	FY2004
12	3.5.06	Rent Simplification and Collections	Reduce cost and achieve greater cost effectiveness	FY2006	FY2006
17	2.8.11	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	FY2015
32	NA	Modifications to the HCV Family Self-Sufficiency Program*	- Increase housing choices for low-income families - Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient	FY2019 (re-proposed in FY2020)	NA
33	NA	Waiver for Third-Party Housing Quality Standards (HQS) Inspections	Reduce cost and achieve greater cost effectiveness	FY2021	FY2021



Initiative 1: Modifications to DCHA's Project-Based Voucher Program

Description/Update

In order to increase housing choices for low-income families, as part of its Partnership Program, DCHA modified existing project-based voucher (PBV) rules and regulations. Specifically, the changes:

- 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 that are subsidized through the Partnership Program.
- Allow Public Housing residents with a right of return to a HOPE VI development to have preference in returning to PBV units that are subsidized through the Partnership Program.
- 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.

Status

Implemented and Ongoing.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2024.

Planned Changes to Metrics/Data Collection

DCHA does not anticipate any changes or modifications to the metrics in FY2024.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2024.

Initiative 4: Simplified Certification and Multi-Year Income Recertification (formerly 2.1.04)

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 double benefit. First, saving staffing costs so scarce 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

In FY2007 for HCV participants and FY2012 for public housing residents, DCHA began conducting recertifications every two years, instead of annually. In conjunction with this change, DCHA adopted local rules for the HCV program that provide work incentives for all participants. Specifically, any increase in earned income in the amount of \$10,000 or less would not result in an increase in rent until the family's next scheduled biennial recertification. However, a family may request an interim recertification and reduction of rent as a result of a reduction in income. These revised procedures provide a lifetime incentive to residents and voucher holders to increase income by removing the current limitation on eligibility for the earned income disregard.

The biennial recertification initiative has been fully implemented for the HCV and Public Housing programs.

As part of the DCHA FY2015 MTW Plan, after further consideration of a previously implemented policy utilizing MTW authority that required families to only report increases in earned income greater than \$10,000 between scheduled recertifications, DCHA sought approval to remove the requirement for public housing residents and voucher participants. In FY2016, the HCV local regulations (Administrative Plan) were revised to reflect the FY2015 Plan approval to eliminate the reporting of any increases in income between recertifications. Families in the voucher program no longer have to report any increases in earned income, regardless of how large, between scheduled biennial recertifications. As DCHA works to encourage self-sufficiency through other activities aimed at residents obtaining employment and increasing earned income, it is anticipated that this change will further incentivize residents.

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. This portion of the initiative has been fully implemented for the HCV and Public Housing programs.

Status

Implemented and Ongoing.

With DCHA's FY2023 Administrative Plan update, the initial voucher term was extended to 180 days, which still aligns well with this initiative's application data validity.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2024.

Planned Changes to Metrics/Data Collection

DCHA does not anticipate any changes or modifications to the metrics in FY2024.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2024.

Initiative 7: DCHA Subsidiary to Act as Energy Services Company (formerly 4.1.04)

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 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.

The ECIP Phase II project is in the construction phase and 80% of the \$86 million in funding was obligated through the end of FY2022. Five AMPs completed construction in FY2022 on mechanical and controls installations as well as boilers and DHW infrastructure replacement and heating infrastructure replacement at the following sites:

- | | |
|-----------------------|--|
| • Ft. Dupont Addition | HVAC System Additional Work |
| • Judiciary House | ECIP II - Mechanical and Controls |
| • Various Properties | Remaining Mechanical and Controls: Scope of Work |
| • Ledroit Senior | Exhaust Fans and Duct Cleaning |

- Greenleaf Family Temporary Boiler

Additional work is currently underway in FY2023 at the following sites:

- Kelly Miller Mechanical Upgrades and Building Control Systems
- LeDroit Apartments Fan Coil Units & Mechanical Riser Replacement
- Greenleaf Family ECIP II - Phase 2 Boiler Scope
- LeDroit Apartments Mechanical Upgrades and Building Control Systems
- Judiciary House ECIP II - Fan Coil Units & Mechanical Risers Replacement Phase 1
- Langston Addition ECIP II - Mechanical and Electrical Upgrades
- Judiciary House ECIP II - Mechanical and Controls

The MTW activity is behind schedule by one fiscal year due to contractual capacity limitations in the job order costing (JOC) program. DCHA is on track to obligate all the ECP work by summer of 2023 and complete work by spring of 2024.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2024.

Planned Changes to Metrics/Data Collection

DCHA does not anticipate any changes or modifications to the metrics in FY2024.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2024.

Initiative 12: Rent Simplification and Collections (formerly 3.5.06)

Description/Update

DCHA 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. It is expected that the cost and staff time associated with this change will decrease with the implementation of this initiative. However, as incomes increase overtime as families move toward self-sufficiency, cost and time savings may decrease.

Status

Implemented and Ongoing.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2024.

Planned Changes to Metrics/Data Collection

DCHA does not anticipate any changes or modifications to the metrics in FY2024.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2024.

Initiative 17: Change in Abatement Process, including Assessment of a Re-inspection Fee as an incentive to Maintain Acceptable Housing Quality Standards in Voucher Assisted Units (formerly 2.8.11)

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. The current fee for the third inspection is \$100.00. 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 does not anticipate any non-significant changes or modifications to this activity in FY2024.

Planned Changes to Metrics/Data Collection

DCHA does not anticipate any changes or modifications to the metrics in FY2024.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2024.

Initiative 18: Creation of Local Authorization and Release of Information Form with an Extended Expiration to Support the Biennial Recertification Process (formerly 3.9.11)

Description/Update

Since DCHA moved to biennial recertifications for HCV, and with future implementation planned for 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 and Ongoing.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2024.

Planned Changes to Metrics/Data Collection

DCHA does not anticipate any changes or modifications to the metrics in FY2024.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2024.

Initiative 20: Enhance Neighborhood Services within Public Housing Communities (formerly 2.9.12)

Description/Update

As a means to better integrate Public Housing developments into surrounding communities while encouraging self-sufficiency, DCHA will convert 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.

DCHA uses its MTW authority under initiative 20 for 48 units on the top two floors of Sibley Plaza for a DC Department of Behavioral Health-funded residential substance abuse treatment program called Safe Haven. The program serves uninsured, low-income, homeless and indigent adults who are substance abusers living with HIV/AIDS and/or mental health challenges. The program's 28-60 day



residential treatment program includes primary medical, mental health, case management, risk reduction/education, literacy, transportation subsidies, and housing placement services, in addition to structured transitional housing for those successfully completing the program.

DCHA has designated another six units across four additional properties for various services.

Status

Implemented and Ongoing.

Safe Haven faced severe operating challenges during the pandemic, ultimately leading to a loss of funding. DCHA is currently assessing whether Safe Haven will be able to resume operations. The agency will continue working with the HUD field office about the status of the applicable units as laid out under this initiative. Potential uses could include alternate service providers or utilizing modernization status to return the units to general occupancy. Further updates will be provided in the FY2023 MTW Annual Report and FY2025 MTW Annual Plan.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2024.

Planned Changes to Metrics/Data Collection

DCHA does not anticipate any changes or modifications to the metrics in FY2024.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2024.

Initiative 23: Encourage the Integration of Public Housing Units into Overall HOPE VI Communities (formerly 3.10.12)

Description/Update

Many of DCHA's Mixed Finance communities include rental Public Housing units and market rate homeownership units. This often causes disagreements and misunderstandings that can best be resolved by bringing all the residents together in a Community Association.

Currently many of our Mixed Finance properties have Homeowner and Tenant Associations (HOTAs)/Community Associations. They are not as effective as they could be because the dues structure does not provide an adequate operating budget to engage in community building activities. With the implementation of this Activity, a budget will be developed that will allow the HOTAs/Community Associations to become an effective force in equitably governing and unifying the community. A community with a healthy, equitable Community Association is a truly mixed-income community, rather than several communities segregated by income level or housing tenancy that exist in physical proximity to each other. When a truly mixed income community is thus created it creates real housing choice for DCHA's low income clientele.

In order to be full-fledged members of the community, Public Housing residents, or their landlords on behalf of the Public Housing residents, must pay HOTA dues to ensure that the community is well-maintained and that a forum for discussing and resolving differences is always available.

Similar to the mechanism planned to allow the provision of selected service-rich environments, DCHA is utilizing its authority for rent simplification to ensure that residing in these units is affordable even



though the property has greater expenses than is typical in Public Housing. DCHA will adopt local rent calculation regulations that allow the managers of Mixed Finance properties to establish an income-based rent and fee structure that ensures that the rents and fees, including HOTA fees, are no more than 30% of adjusted income. Each public housing tenant will be given a HOTA dues allowance similar to a utility allowance, thus reducing the total rent charged so the cost of the dues will not increase the tenant's housing expenses.

Status

Implemented and Ongoing.

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

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2024.

Planned Changes to Metrics/Data Collection

DCHA does not anticipate any changes or modifications to the metrics in FY2024.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2024.

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

Description

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.

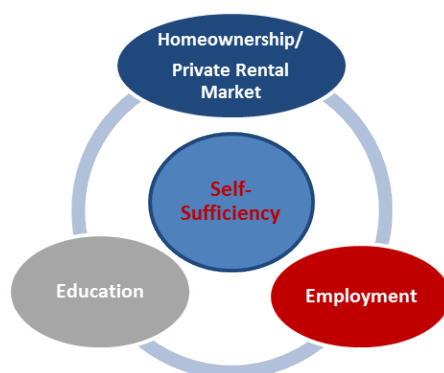
Modified Apprenticeship Program

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

Pathway (Primary Goal)/ Participation Elements	Employment			
	Private Rental Market	Education	Apprenticeship Training Program	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 a 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 educational 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 based on hours worked during program Job Readiness and Life Skills Training Job Placement assistance 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



Pathway (Primary Goal)/ Participation Elements	Employment			
	Private Rental Market	Education	Apprenticeship Training Program	General Program
Basic eligibility	Households with incomes between 50% and 80% of median income range, depending on household size = \$41,050-\$102,250 at least \$32,000 in earned income (HOH and spouse)	GED or High School Diploma 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
The program will maintain financial literacy as a core component across pathways.				

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

Beginning in 2019, a wait list was created for housing choice voucher participants who expressed interest while DCHA awaited HUD approval to implement the modified program. To date, there are over 300 participants on the list. Also, in January 2020, DCHA invested in new software that will capture the financial incentives aligned with the Self-Sufficiency Pathways to Success. In addition, DCHA hired a FSS Homeownership Coordinator in February 2020 to work with participants pursuing the goal of homeownership.

Enrollment into the homeownership and education pathways is ongoing. DCHA is currently evaluating implementation of the earned income disregard that will allow for full implementation of the employment pathway.

Planned Non-Significant Changes

DCHA does not anticipate any non-significant changes or modifications to this activity in FY2024.

Planned Changes to Metrics/Data Collection

DCHA does not anticipate any changes or modifications to the metrics in FY2024.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2024.

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

Description

The District of Columbia Housing Authority (DCHA) proposed to have its 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 than using third-party inspectors. Using a third-party inspections contractor slowed the leasing process and caused delays on quality



control and emergency inspections. Having the authority 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 FY2024.

Planned Changes to Metrics/Data Collection

DCHA does not anticipate any changes or modifications to the metrics in FY2024.

Planned Significant Changes

DCHA does not anticipate any significant changes or modifications to this activity in FY2024.



B. Not Yet Implemented

There are not any not yet implemented Activities (Initiatives).



C. Activities on Hold

There are no Activities (Initiatives) currently on hold.

D. Closed Out Activities

New Number	Old Number	Activity	Statutory Objective	Yr. Identified	Yr. Implemented
N/A	1.2.04	Locally Defined Site and Neighborhood Standards	Increase housing choices for low-income families	FY2004	Implemented FY2004, Closed Out FY2011
N/A	2.4.04	Special Occupancy for Service Providers	Reduce cost and achieve greater cost effectiveness	FY2004	Never Implemented Closed Out FY2005
N/A	3.1.04	Voluntary Resident Community Service	Reduce cost and achieve greater cost effectiveness	FY2004	Never Implemented Closed Out FY2004
N/A	3.2.04	Resident Satisfaction Assessment	Reduce cost and achieve greater cost effectiveness	FY2004	Implemented FY2004 Closed Out FY2004
N/A	1.7.05	Security Deposit Guarantee Program	Increase housing choices for low-income families	FY2005	Never Implemented, Closed Out FY2010
N/A	1.8.05	Modification to HCV Inspections Scheduling	Reduce cost and achieve greater cost effectiveness	FY2005	Never Implemented Closed Out FY2006
6	2.3.04 & 2.5.05	Modifications to Pet Policy	Reduce cost and achieve greater cost effectiveness	FY2005	Implemented FY2005 Closed Out FY2016
N/A	3.3.05	Streamlining Resident Community Service	Reduce cost and achieve greater cost effectiveness in federal expenditures	FY2005	Implemented FY2005 Closed Out FY2012
9	3.3.05	Streamlined Operating Subsidy Only (OPERA) Protocol—Operating Assistance for Rental Housing	- Reduce cost and achieve greater cost effectiveness - Increase housing choices for low-income families	FY2005	Not Yet Implemented
N/A	4.2.05	Revolving Loan Fund for HCV Landlords	Increase housing choices for low-income families	FY2005	Never Implemented Closed Out FY2009
N/A	4.3.05	Flexible Funding	Reduce cost and achieve greater cost effectiveness	FY2005	Implemented FY2005 Closed Out FY2010
N/A	4.4.06	Reformulation of HUD Forms	Reduce cost and achieve greater cost effectiveness	FY2006	Implemented FY2006 Closed Out FY2010
13	2.6.07	Enhanced Public Housing Lease Enforcement Operations	Increase housing choices for low-income families	FY2007	Closed Out FY2013



New Number	Old Number	Activity	Statutory Objective	Yr. Identified	Yr. Implemented
N/A	1.11.08	Maximizing Public Housing Subsidies	- Reduce cost and achieve greater cost effectiveness - Increase housing choices for low-income families	FY2008	Never Implemented Closed Out FY2008
14	3.6.08	Streamlining the Transition from Project-Based to Tenant-Based Vouchers	Reduce cost and achieve greater cost effectiveness	FY2008	Implemented FY2009 and Closed Out 2012
21	2.10.12	DCHA Local Mixed Subsidy Program	- Increase housing choices for low-income families - Reduce cost and achieve greater cost effectiveness	FY2012	Never Implemented Closed Out FY2016
10	3.4.05	Supporting Grandfamilies	Encourage families to obtain employment and become economically self-sufficient	FY2005	Implemented FY2005 Closed Out FY2016
26	NA	Local Investment Policy	Reduce cost and achieve greater cost effectiveness	FY2014	Not fully implemented
30	NA	HQS Scheduling	Reduce cost and achieve greater cost effectiveness	FY2015	Not fully implemented Closed Out FY2017
15	3.07.08	Reform Housing Quality Standards	Reduce cost and achieve greater cost effectiveness	FY2008	Not Yet Implemented
28	NA	Rent Reform Demonstration (HCVP)	Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient	FY2014	Implemented FY2015 Closed Out FY2021
29	NA	HQS Biennial Inspections for Landlords in Good-Standing	Reduce cost and achieve greater cost effectiveness	FY2015	Implemented FY2018 Closed Out FY2021
19	4.5.11 ¹	Establishment of Resident Driven Community Based Programs to Improve Customer Service and Foster Greater Resident Empowerment	Reduce cost and achieve greater cost effectiveness	FY2011	Never Implemented Closed Out FY2023
27	NA	Family Stabilization through Housing and Education Demonstration	Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient	FY2013	Never Implemented Closed Out FY2023

¹ Initiative 4.5.11 Establishment of Resident Driven Community Based Programs to Improve Customer Service and Greater Resident Empowerment was originally numbered 4.3.11 in the FY2011 MTW Plan and FY2012 MTW Plan. In the FY2011 MTW Report the number was changed to recognize the previous use of 4.3.05 and 4.4.06 and to avoid confusion between the other initiatives.



New Number	Old Number	Activity	Statutory Objective	Yr. Identified	Yr. Implemented
2	1.3.04	Designation of Elderly-Only Properties	Reduce cost and achieve greater cost effectiveness	FY2004	Implemented FY2004 Closed Out FY2023
5	2.2.04	Modifications to Market-Based Rents	- Reduce cost and achieve greater cost effectiveness - Encourage families to obtain employment and become economically self sufficient	FY2004, FY2016, & FY2018	Implemented FY2004 Closed Out FY2023
16	2.7.11	Requirement to Correct Minor HQS Unit Condition Discrepancies—Tenant/Landlord Self-Certification	Reduce cost and achieve greater cost effectiveness	FY2011	Implemented FY2012 Closed Out FY2023
34	NA	Virtual Housing Quality Standards (HQS) Inspections	Reduce cost and achieve greater cost effectiveness	FY2021	Implemented FY2021 Closed Out FY2023
24	NA	Simplified Utility Allowance Schedule	Reduce cost and achieve greater cost effectiveness	FY2013	Implemented FY2014 Closed Out FY2024
31	NA	Unit Protection Incentive Program (UPIP)	Increase housing choices for low-income families	FY2018	Never Implemented Closed Out FY2024



Locally Defined Site and Neighborhood Standards

Description

As outlined in Attachment C of the DCHA original MTW agreement, DCHA needed the ability to move swiftly to expand and preserve affordable housing in the District of Columbia in the face of rapid and dramatic gentrification of many of the city's neighborhoods. These are neighborhoods targeted for revitalization as indicated by designation as an Empowerment Zone, Housing Opportunity Area, Strategic Neighborhood Target Area or Neighborhood Strategy Areas under the Community Development Block Grant (CDBG). Under stated federal requirements, the use of census data would not provide accurate and timely demographic information reflective of the quickly changing racial and economic landscape of the city's neighborhoods. Establishment of Locally Defined Site and Neighborhood Standards provided DCHA with the agility necessary to determine the location of newly constructed or substantially rehabilitated housing to be subsidized through project-based section 8 voucher funding or Public Housing operating subsidy. In determining the location of such housing, in lieu of the Site and Neighborhood Standards set forth in 24 CFR 941.202(b)-(d), DCHA acted in accordance with the following locally established requirements:

1. The units may be located throughout the District, including within the following types of urban areas: (i) an area of revitalization that has been designated as such by the District of Columbia; (ii) an area where Public Housing units were previously constructed and were demolished; (iii) a racially or economically impacted area where DCHA plans to preserve existing affordable housing; or (iv) an area designated by the District of Columbia as a blight elimination zone; and
2. A housing needs analysis indicates that there is a real need for the housing in the area; and
3. When developing or substantially rehabilitating six or more units, DCHA will provide documentation to HUD which evidences that: (i) during the planning process, it has consulted with Public Housing residents through appropriate resident organizations and representative community groups in the vicinity of the subject property; (ii) it has advised current residents of the subject properties ("Resident") and Public Housing residents, by letter to resident organizations and by public meeting, of DCHA's revitalization plan; and (iii) it has submitted a signed certification to HUD that the comments from Residents, Public Housing residents and representative community groups have been considered in the revitalization plan.

In addition, the locally defined site and neighborhood standards complied with the Fair Housing Act and Title VI of the Civil Rights Act of 1964, and the implementing regulations referenced compliance with these Acts. Similar to HOPE VI Site and Neighborhood Standards, a DCHA project for which locally defined site and neighborhood standards were applied would either have to:

- Encourage reinvestment in areas of minority concentration;
- Improve or preserve affordable housing in the area;
- Provide quality housing choices for assisted households; or
- Reduce displacement in properties undergoing substantial rehabilitation as part of a comprehensive neighborhood revitalization strategy

Status

Implemented (FY04); Closed Out (FY11)

In 2012, the MTW Office, in consultation with HUD's Urban Revitalization Division of the Office of Public Housing Investments, advised DCHA that MTW flexibility relative to site and neighborhood standards for DCHA's HOPE VI developments is not necessary and that local site and neighborhood standards cannot be approved for future non-HOPE VI development activities.

Special Occupancy Policy of Service Providers

Description

Both sworn and special police officers in DCHA's Office of Public Safety and the District of Columbia Metropolitan Police Department officers can serve their community better if they are part of it. DCHA currently makes use of this resource at several of its communities. The same would be true for other service providers as well. In addition to security officers, DCHA proposed creating policies to allow members of Vista, AmeriCorps, and similar organizations to live in DCHA Public Housing units in exchange for the services that they provide.

Status

Closed Out (FY05)

Many of the Resident Councils in DCHA's Public Housing communities felt strongly that it was more beneficial to continue to house traditional Public Housing residents rather than the service providers. Because of this input, DCHA discontinued exploration of this initiative.

Voluntary Resident Community Service

Description

Under this initiative, DCHA sought to seek voluntary, rather than the Quality Housing and Work Responsibility Act (QHWRA) required, community service by the residents of its communities while seeking to expand opportunities for residents to be empowered and inspired to make a difference and contribute service to their community.

Status

Closed Out (FY04)

In FY2004, DCHA completed the development of this initiative with the adoption of the Neighbor to Neighbor policy designed to provide incentives for voluntary community service. However, based on a legal determination from HUD that the community service requirement was not subject to the MTW agreement, and thereby was not to be implemented as voluntary for Public Housing residents, this initiative has been closed out.

Resident Satisfaction Assessment

Description

In FY2003, DCHA initiated a sophisticated assessment protocol to reliably determine resident satisfaction. Through a third party professional analyst of customer service satisfaction, DCHA assessed customer satisfaction using a combination of professionally administered surveys of a scientifically selected sample of residents and a carefully selected focus group representing a mix of interests. DCHA proposed as part of its first MTW Plan for FY2004 to continue this process on a biennial basis, submitting the findings biennially as part of the MTW Annual Report in place of the HUD administered resident satisfaction survey. This approach was adopted by DCHA as it more effectively measured customer satisfaction than the HUD administered survey. For example, the HUD survey consistently had low response rates and relied too heavily on the literacy of customers being surveyed.



Status

Implemented (FY04); Closed Out (FY04)

Although DCHA found the information gathered from its survey approach to be reliable and useful in shaping the Agency's programs and making key decisions, it was decided during FY2004 that DCHA would not pursue this initiative due to cost of administering the more sophisticated survey.

Security Deposit Guarantee Program

Description

Over the years, DCHA has sought to enhance the housing opportunities available to our housing choice voucher participants. One item that has consistently been an issue is the limited ability of some voucher participants to secure funding for a security deposit. DCHA explored the development of a small security deposit guarantee program to which voucher recipients could subscribe for a monthly fee in lieu of a lump sum security deposit payment to landlords. The goal of the proposed program was to provide a mechanism whereby voucher participants are not unduly restricted from leasing potential units. This Initiative would have required flexible use of funds to allow for the payment of any claims on any guarantee where the recipient caused damage.

Status

Closed Out (FY10)

Due to MTW funding limitations and lack of local funding to supplement the MTW funds, the initiative was not pursued beyond initial exploration.

Modification to HCV Inspections Scheduling

Description

DCHA considered alternatives to the standard housing choice voucher inspection schedule, allowing the inspections staff to focus on properties which or landlords who persistently fail to meet HQS standards. DCHA considered categorizing properties with HAP contracts according to risk, quality, or upkeep level, and proposed using this categorization to determine the frequency of inspections. It was believed that many properties would only need to be re-inspected on a multi-year schedule thus allowing staff efficiency and a focus on properties or landlords that indicate a need for more frequent inspection.

Status

Closed Out (FY06)

Upon exploration, DCHA staff could not find sufficient patterns of consistency among landlords or properties to justify reducing inspection frequency. DCHA felt that because of the high failure rate of HQS inspections and the age of the housing stock affordable to HCV participants, the benefits of annual inspections outweighed any potential cost savings from this proposed initiative.

Modifications to Pet Policy

Description

In FY2004, DCHA adopted a local policy that only allows pets as a reasonable accommodation for families with a disabled member(s) requiring a pet. In FY2005, DCHA created a new policy governing the ownership of pets on DCHA properties. Based on public input and the realities of managing large



subsidized rental communities, DCHA adopted regulations that limit pet ownership to those residents in both senior and family developments who are in need of service animals with a grandfather provision for those residents in senior buildings who had a pet prior to the effective date of the regulation.

Status

Implemented (FY05); Closed Out (FY16)

In February 2016, DCHA received notice from HUD that its 2005 approval of this activity was being rescinded based on an assessment of the applicability of Section 227 of the Housing and Urban-Rural Recovery Act of 1983 (12 U.S.C. 1701r-1), and its implementing regulations at 24 CFR Part 5 Subpart C to DCHA's use of its MTW authority to establish its pet policy.

Streamlining Resident Community Service

Description

Under this initiative, DCHA sought to identify regulatory simplifications and administrative streamlining with respect to the implementation of the statutory resident community service requirement. As such the Agency implemented the following:

- Automatically determining those individuals who are not exempt based on data residents already report regarding income amount and sources
- Setting the number of work activity related hours required by an adult household member to be exempt from the community service requirement
- Documented self-certification by non-exempt members of compliance with the community service requirement

Status

Implemented (FY05); Closed Out (FY12)

As this activity was implemented in FY2005, the measurable benefits are in the past, prior to the new reporting requirements under the MTW Agreement. No incremental cost savings are expected beyond the point of close-out.

Streamlined Operating Subsidy Only (OPERA) Protocol-- Operating Assistance for Rental Housing

Description

DCHA requested and received approval for a Streamlined Operating Subsidy Only (OPERA) Protocol as part of the FY2008 MTW Plan process. The first project approved under this initiative was Barnaby House; however, market conditions prohibited this project from being completed.

In addition to streamlined approval of Operating Subsidy Only mixed-finance transactions, OPERA also modifies HUD's requirement that the Agency record a Declaration of Trust in first position for properties receiving Public Housing subsidies; provides relief from the 10-year use restriction contained in Section 9(a)(3) of the U.S. Housing Act of 1937; and approves the form of project documents including an operating agreement entitled "Agreement Regarding Participation in the Operating Assistance for Rental Housing Program" and an Annual Contributions Contract amendment entitled "Operating Assistance Amendment to Consolidated Annual Contributions Contract".

Although OPERA was an approved initiative under DCHA's original MTW Agreement, language necessary to continue the use of the authority was not included in the negotiated Restated and Amended MTW Agreement executed in September 2010. As such, DCHA worked with HUD to amend Attachment D of the new MTW Agreement so that this initiative can be reinstated as part of the Agency's ongoing activities.

DCHA continued to explore methods to further encourage owners of privately-owned and financed housing to include Public Housing units in new or rehabbed properties.

Status

Approved (FY05); Closed Out

The initiative has not implemented as anticipated due to challenges posed by the developer's organizational structure and GAAP reporting requirements. Given the time since the initiative was passed and the initiative has not been implemented, DCHA has decided to close it out.

Revolving Loan Fund for HCV Landlords

Description

The HCV lease-up process is often impeded by delays in making repairs to units with HQS deficiencies. Additionally, DCHA is often faced with no other option than to halt the payment of HAP subsidy for existing clients when landlords are delinquent in repairing deficiencies identified during annual inspections. To lessen these problems, DCHA explored the development of a revolving loan program as an incentive for landlords to make required HQS repairs quickly.

Components of the program design were to include deducting the loan payments from the HAP payment and placing a lien on the property until the loan is paid off. DCHA planned to capitalize this program using the flexibility allowed by the MTW Block Grant. With a mechanism, such as the proposed loan program, in place to make HQS repairs quickly, DCHA hoped to maintain the supply of affordable HCV units and to reduce the inconvenience for the voucher holder. The revolving loan fund would have allowed an HCV participant-occupied unit to be repaired timely rather than force a participant to find and move to a compliant unit

Status

Closed Out (FY09)

Due to MTW funding limitations and lack of local funding to supplement the MTW funds, the initiative was not pursued beyond initial exploration.

Flexible Funding

Description

This initiative allows DCHA to exercise its funding fungibility authority as provided for in its MTW Agreement to utilize MTW Block Grant funds to support investments in operational costs and costs associated with providing customer service, resident programming, enhanced public safety for our residents, and capital projects that will improve access to resident services and expand affordable housing opportunities.

Status



Implemented (FY05); Closed Out (FY10)

DCHA has been advised by the MTW staff at HUD that because flexible funding is part of our new MTW Agreement, a standalone flexible funding initiative is no longer required.

Reformulation of HUD Forms

Description

Many of DCHA's functions, both Public Housing and assisted housing through the Housing Choice Voucher Program use HUD prescribed forms for implementation. The forms facilitate uniformity and efficiency and in many cases work very well. The staff has discovered, however, that the prescribed forms may not in all cases serve our customers or internal operations as effectively or efficiently as possible. Some forms may not request as much information as would be useful to the customer or to DCHA. Additionally, they may not appropriately request or document information on aspects of the programs that have been modified locally through an MTW initiative.

For instance, the Housing Choice Voucher Program has simplified the voucher program by providing vouchers for a full 180 days, rather than a 60 day initial period with a 120 day extension. This has reduced the amount of staff time and also has been customer friendly as it allows all voucher holders the full amount of the time to locate a unit without requiring staff to "evaluate" each request for an extension. The HUD provided forms do not reflect this policy change and in its current form requires staff to input two dates, the initial period and an extension. In situations like this, where there would be efficiencies and customer improvements from a local form, DCHA would develop a local form in substitution of the HUD provided form. DCHA would not be modifying the forms, rather it would substitute, as the Moving to Work program contemplated, a locally devised solution that responds to locally identified program needs.

DCHA contemplated this Initiative continuing through the term of the Moving to Work Agreement in order to facilitate implementation of locally revised or devised programs, rather than a burdensome review of all forms at one point in time when Initiatives are still being developed and implemented.

Status

Implemented (FY06); Closed Out (FY10)

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 and has therefore been closed out. If modifications to HUD forms are required, that action will be proposed as part of a specific MTW initiative.

Enhanced Public Housing Lease Enforcement Operations

Description

DCHA utilized MTW regulatory flexibility in the 2008 revised Public Housing dwelling lease to include provisions that allow the incorporation by reference of property specific community rules developed and adopted by the individual Resident Councils. The resulting lease, local regulations, policies and procedures are designed to give greater control of its properties to residents who are committed to a community's wellbeing and improve the effectiveness of its lease enforcement efforts.

DCHA has worked with individual Resident Councils to establish property specific community rules. No



Resident Council, however, has availed itself of the option to establish property specific community rules.

Status

Closed Out (FY13)

Given the lack of movement with implementation of this activity, DCHA is changing the status to "Closed". However, 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.

Maximizing Public Housing Subsidies

Description

Since the start of its MTW demonstration, DCHA has implemented a number of innovative mixed-finance redevelopment deals that are generating approximately \$1.5 billion in economic activity in the District of Columbia, and which produced a number of new or rehabbed affordable housing units in a gentrifying city. While the housing authority has used most tools in the development toolkit, one tool, the use of ACCs, has not been creatively maximized despite its capacity to complement operational costs of very low income housing.

During FY07 and FY08, DCHA explored the combining of ACCs in order to generate adequate public resources to support the rising operational costs of a unit in the District of Columbia. It was decided that DCHA would not pursue the use of ACCs in this manner.

Status

Closed Out (FY08)

This activity was approved in FY08, but not implemented as originally crafted. However, in FY2014, DCHA introduced its *Local Blended Subsidy* initiative—a more developed initiative in which implementation began in FY2014.

Streamlining the Transition from Project-Based to Tenant-Based Vouchers (formerly 3.6.08)

Description

The District of Columbia has lost thousands of project-based contracts throughout the past decade due to the "opting out" of private owners whose contracts with HUD were expiring. Like most housing authorities, DCHA plays a key role during the transition phase of a project-based development through the counseling of the households impacted and the issuing of tenant-based vouchers.

In response to the large number of opt-outs, DCHA streamlined the transition of households from a project-based contract to a tenant-based voucher. Given that the affected households are already in a HUD-funded program and had been certified for eligibility, DCHA accepts the eligibility and re-certification data collected by the landlord under the project-based contract.

Status

Implemented (FY09); Closed Out (FY12)

As this activity was implemented in FY2009, the measurable benefits were in the past, prior to the new reporting requirements under the MTW Agreement. No incremental cost savings were expected beyond

the point of close-out.

DCHA Local Mixed Subsidy Program

Description

In order to preserve public housing, DCHA is proposing to use its MTW authority to use housing choice voucher subsidy in combination with Public Housing subsidy to finance and operate newly renovated or constructed properties. Using the MTW authority, all tenants in the newly renovated or constructed properties regardless of the subsidy source will be treated the same—tenants will be given all the rights and responsibilities that DCHA Public Housing residents are afforded.

The first property for which this activity will apply is Highland Dwellings, a conventional Public Housing community consisting of 208 units. The renovation of Highland Dwellings will be financed through tax-exempt bonds and 4% tax credits, along with other public housing funding. In order to pay the debt service on the bonds, 83 units will be subsidized using project based vouchers. The other 125 units will be subsidized through the public housing program. Under this MTW initiative, however, the tenants living in all the units and the units themselves, regardless of the subsidy source will be governed by the policies and procedures that govern DCHA's public housing. At Highland Dwellings, the renovations will be made to vacated units. The former residents of the development will all be given the right to return and be the initial occupants of the newly renovated or newly constructed units with future vacancies filled from the Public Housing waiting list.

The goal of the program is to use voucher budget authority to leverage the financing necessary to fund redevelopment, modernization and routine maintenance at Public Housing developments, while maintaining the stability of the community by continuing to manage the property and residents under one set of rules – public housing rules. This activity meets the MTW statutory objective to reduce cost and achieve greater cost effectiveness in federal expenditures. Examples of Public Housing occupancy policies that will be applied to all residents in a development designated a Local Mixed Subsidy Program include:

- All residents of the newly renovated property will pay public housing rents. The property will have Market-based Rent Cap schedule established based on data collected as part of the HCV Reasonable Rent determination process and rents will be charged according to Public Housing rent policies; in accordance with these policies, residents whose income-based rent would exceed the Market-based Rent Cap will only pay the Market-based rent; there will be no limitation on the length of time that the resident can remain in tenancy paying the Market-based Rent;
- Residents in good standing who are approved for or are required to transfer, for under-/over-housing issues, for reasonable accommodation requirements, or for public safety issues for example, will be offered units in other Public Housing developments in accordance with the DCHA Public Housing transfer policies; no residents, regardless of the subsidy source on the unit, will be given a tenant-based voucher upon transfer;
- Residents with grievances will have access to DCHA's Public Housing Grievance process;
- The UPCS inspection protocol will be used;
- The Public Housing lease will be used;
- If the property renovation requires relocation of the existing residents, all former residents will have the right to return to the renovated property. After that, Public Housing waiting lists will be used to fill the vacancies at the property; and
- Eligibility and screening criteria will be used as provided for in DCHA Public Housing regulations. No households who have income greater than 80% of the adjusted median income at initial admission will be housed.

As the implementation work was to be completed, it was anticipated that other differences between



public housing operating policies and procedures and the HCV Administrative Plan may be found. In those cases the public housing rules would have been used rather than HCV provisions.

Status

Closed Out (FY16)

This activity was initially proposed in order to implement redevelopment activity at Highland Dwellings. However, due to identification of a more effective approach to financing the work, the activity was not implemented and placed on hold. Instead, DCHA proposed a different activity that utilizes a different MTW flexibility to facilitate the redevelopment of the site (see *Initiative #25: Local Blended Subsidy (LBS)* for detail about proposed MTW authority to be used for the Highland Dwellings redevelopment activity). As such, DCHA has decided to close-out this activity.

Supporting Grandfamilies

Description

Increasingly, grandparents have become the legal guardians or primary caregivers for their grandchildren. This trend is evident in many of DCHA's households. DCHA has explored ways to use or modify Public Housing or voucher policies as resources to help provide support for such families. To date, DCHA has implemented a policy to exclude from the calculation of income the receipt of a local stipend that the District of Columbia provides to grandparents as caregivers of their grandchildren.

Status

Implemented (FY 05); Closed Out (FY16)

DCHA is closing out this activity because MTW authority is no longer necessary for the exclusion of the local grandparent as caregivers stipend provided by the city as income in the calculation of rent.

Any additional activities aimed at supporting grandparents as caregivers will be proposed in a future plan for approval.

Local Investment Policy

Description

HUD, as defined in the Annual Contributions Contract (ACC) and guided by Notice PIH 96-33, requires housing authorities to invest General Fund (program) monies only in HUD approved investments. These investments, if utilized fully, are outdated and risky. As a steward of the public trust, charged with achieving the best and highest use of its funding to serve its clients, DCHA is proposed to use its MTW authority to adopt a local investment policy that would achieve a portfolio which is safer, more liquid and realizes a more competitive yield. Based on a review of District of Columbia governmental entity eligible investments, DCHA determined the city's eligible investments are more up to date and safer for governmental funds to be invested. As such, DCHA's proposed local investment policy would be consistent with District of Columbia law to the extent such policies are in compliance with applicable Office of Management and Budget (OMB) circulars and other federal laws. Under the local investment policy, DCHA looked to invest only in securities authorized under District law that would allow the flexibility to invest productively and efficiently.

DCHA would have invested in safer investment instruments with lower transaction costs and higher competitive yield. It was anticipated that operating under this policy would give DCHA a higher return on its portfolio with less staff resources devoted to the process. Thereby reducing cost and higher net



portfolio return would have achieved greater cost effectiveness in federal expenditures, allowing the Agency the enhanced ability to further the MTW statutory objectives through other initiatives.

Status

Approved (FY14) (never fully implemented); Closed Out (FY17)

DCHA has decided to no longer pursue this initiative as ongoing review of investments and potential yields does not warrant moving forward with this action.

HQS Scheduling

Description

DCHA found that at times when there is a large volume of initial, annual and re-inspections inspections that need to be completed in the same month, delays may occur if DCHA did not incur the cost of overtime to make sure all inspections were completed as required. Given the need to house families as quickly as possible, DCHA decided that the most prudent way to balance the importance of housing families timely with ensuring ongoing HQS compliance and sound money management was to allow for extended HQS inspection scheduling. Under this initiative, DCHA planned to schedule inspections to occur on a 12 month basis; however, it would have the ability to reschedule annual inspections to occur beyond the 12-month/365 day window, not to exceed 90 days past the annual inspection anniversary date.

DCHA anticipated reducing cost and achieving greater cost effectiveness by eliminating overtime costs necessary to ensure timely completion of annual, initial re-inspections and compliance inspections. In FY2014, DCHA spent on average of approximately \$5,300/month in overtime to ensure annual HCV MTW unit inspections were completed timely in light of required initial inspections for new vouchers received through two opt-outs and a new VASH allocation. DCHA conducted a total of 622 annual inspections as a result of new opt-out vouchers and new VASH vouchers received during the fiscal year. The Agency projected that it may have to spend approximately the same amount in FY2015, given a projected 645 new opt-out vouchers that DCHA expects to receive.

The ongoing need for this initiative after initial implementation was dependent upon the number of units/properties that enroll in the proposed biennial inspection program.

Status

Approved (FY15) (never fully implemented); Closed Out (FY17)

DCHA closed this initiative as the flexibility it granted was no longer needed based on the number of eligible landlords/owners opting to participate in the HQS Biennial Inspections for Landlords in Good-Standing MTW initiative.

Reform Housing Quality Standards (formerly 3.7.08)

Description

DCHA explored modifying the definitions and content of the housing quality standards to reduce uncertainty as to the nature of a unit's deficiency. The research included an analysis and comparison of all the various different housing standards across the federal housing programs and local housing programs. It was expected, that the modified standards would better align the standards of the HCV program to other housing programs. If deemed appropriate upon completion of the research, the housing authority intended to modify and standardize inspection standards with the goal of reducing



leasing delays, which negatively impacts our clients, and reducing repetitive inspections, which impacts the efficient use of staff time.

Additionally, DCHA was working with three local government agencies in the District which conduct inspections on multifamily properties. The inspections by the various agencies were often conducted on the same units, resulting in redundant work and multiple inconveniences for residents.

Status

Approved (FY08) (never implemented); Closed Out (FY18)

Based on DCHA's final assessment, the agency has determined that this is no longer viable to pursue this initiative based on the potential variability of inspection results across inspectors from different agencies, especially with the pending rollout of Uniform Physical Condition Standards for Vouchers (USPC-V).

Rent Reform Demonstration (HCVP)

Description

The District of Columbia Housing Authority (DCHA) was selected to participate in a demonstration commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the "Demonstration"). MDRC, a nonprofit and nonpartisan education and social policy research organization, is conducting the Demonstration on behalf of HUD. The Demonstration sets forth alternative rent calculation and recertification strategies that were implemented at several public housing authorities across the country in order to fully test the policies nationally.

The goals of this alternative rent policy were to:

- Create a stronger financial incentive for tenants to work and advance toward self-sufficiency
- Simplify the administration of the HCV Program
- Reduce housing agency administrative burden and costs
- Improve accuracy and compliance of program administration
- Remain cost neutral or generate savings in HAP expenditures relative to expenditures under traditional rules
- Improve transparency of the program requirements

A computer generated program randomly selected the participants for the Demonstration from the pool of eligible vouchers. The Study Group vouchers were managed using the proposed policies. The Control Group was managed using existing policies. A total of 2,000 families were selected to participate—1,000 were assigned to the Study Group and 1,000 were assigned to the Control Group.

Description of Rent Reform Components

The Demonstration is designed to test an alternative strategy to standard HUD operating rules for the HCV program. The proposed alternative rent policies will include the following five key features:

- 1) Simplify income determination and rent calculation of the household's Total Tenant Payment (TTP) and subsidy amount by:
 - a) Eliminating deductions and allowances,

- b) Changing the percent of income from 30% of adjusted income to a maximum of 28% of gross income,
 - c) Ignoring income from assets when the asset value is less than \$25,000,
 - d) Using retrospective income, i.e., 12-month “look-back” period and, in some cases, current/anticipated income in estimating a household’s TTP and subsidy, and
 - e) Capping the maximum initial rent burden at 40% of current gross monthly income.
- 2) Conduct triennial income recertification rather than biennial recertification with provisions for interim recertification and hardship remedies if income decreases.
 - 3) Streamline interim recertifications to eliminate income review for most household composition changes and moves to new units.
 - 4) Require the Family Share is the greater of TTP (see #1 above) or the minimum rent of \$75. A portion of the Family Share will be paid directly to the landlord.
 - 5) Simplify the policy for determining utility allowances.

Status

Implemented (FY15); Closed Out (FY21)

DCHA was selected to participate in the Rent Reform Demonstration commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy. MDRC, a nonprofit and nonpartisan education and social policy research organization conducted the Rent Reform Demonstration on behalf of HUD. In January 2015, MDRC and DCHA entered into a MOU for DCHA’s participation in the Rent Reform Demonstration. Pursuant to the MOU, the term expired on September 29, 2019. Therefore, after the MOU expired, DCHA transitioned those participants in the Rent Reform Demonstration back to the traditional program. Since the stated objectives were accomplished, DCHA no longer requires the use of MTW flexibility.

HQS Biennial Inspections for Landlords in Good-Standing

Description

HUD regulations currently mandate that housing authorities inspect every HCVP unit at least once annually to ensure it meets Housing Quality Standards (HQS). Before a family takes possession of a unit for the first time, DCHA conducts an initial inspection. Although the Consolidated Appropriations Act of FY2014 included a policy change that allows housing authorities to implement biennial inspections, at the time this plan was drafted, HUD had not provided guidance on implementation of this policy change. In lieu of formal HUD guidance, DCHA is proposing to use its MTW authority to implement a biennial HQS inspections program for landlords/owners in good standing as defined by specific performance criteria that upholds HUD’s standards of decent, safe, and sanitary housing for assisted HCVP households. Units/Properties approved to move to a biennial HQS inspection cycle will be required to have an HQS Inspection conducted at least one time every other fiscal year. It is DCHA’s expectation through the implementation of this initiative that the agency will be able to meet HUD’s HQS requirements in a more cost effective manner.

Status

Implemented (FY18); Closed Out (FY21)



DCHA is closing out 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 notice that went into effect in July 2014.²

Establishment of Resident Driven Community Based Programs to Improve Customer Service and Foster Greater Resident Empowerment

Description/Update

Working with Resident Councils, DCHA proposed to create resident-driven and resident-implemented community-based programs to increase and improve quality of life services at DCHA's properties and achieve greater resident empowerment and self-sufficiency. In exchange for participating in the program by volunteering their time, residents would be rewarded with an income deduction for rent calculation purposes. Participation by each community and/or by each individual would be strictly voluntary. DCHA proposed to use its MTW authority to implement the income deduction.

Status

Approved (FY11) (never implemented); Closed Out (FY23)

DCHA is closing out this activity because the agency has implemented alternative engagement strategies for senior residents across the portfolio.

Family Stabilization through Housing Education Demonstration

Description/Update

Chronic truancy has been described as "an educational crisis" in the District of Columbia, with rates as high as 40% at some high schools. Under District of Columbia law, once a child has 10 unexcused absences the child is referred, depending on age to Child and Family Services or the Court Social Services and/or the Office of the Attorney General. DCHA planned to provide supports for those children and their families so such referrals did not occur. This would include working with families on strategies to reduce occurrences and ultimately eliminate unexcused absences. To do this, DCHA proposed expanding its relationship with the District of Columbia Public Schools (DCPS), District of Columbia Charter Schools, and other partners to establish an educational stabilization demonstration that will provide case management for DCHA Public Housing families with children in elementary and middle school, ages 10-14, who appeared to already have challenges with school attendance.

DCHA's program will be voluntary for Public Housing families and participation in the program would last until the child completes high school. The potential length of participation could be up to nine years for fourth graders entering the program. Families in which absenteeism/truancy are or may become an issue will be identified for outreach to participate in the program. DCHA is working with DCPS and the Deputy Mayor's Office on Education and Human Services to identify a Public Housing site(s) and partnering elementary/middle schools by cross-referencing school and DCHA resident data. Similar work will be undertaken with DC Charter Schools.

Each family would have a case manager who would work with the family to identify a plan for addressing their child's absenteeism/truancy, inclusive of strategies to deal with those familial, school and environmental challenges. In addition to supporting each child's academic achievement, DCHA will

² <https://www.ncsha.org/wp-content/uploads/2014/06/2014-14915.pdf>



provide support to parents in moving the family toward self-sufficiency (i.e. GED preparation, job readiness, life skills, etc.).

DCHA would utilize existing staff resources, including the provision of case management/coordination. In addition, DCHA would utilize existing supportive service resources provided through existing partnerships with agencies/organizations to augment case management and access to other services needed by participating families (i.e. DCPS tutors, DOES jobs programs, job training provided at DCHA's Southwest Family Enhancement Center, etc.).

As a work incentive, DCHA would cap the rents of participating families upon entry into the program, but rents would not be less than \$25 a month. While all program participants have to pay at least \$25/month in rent, this will not be a requirement for entry into the program. Instead, families paying less than \$25/month at program entry will experience rent increases as earned income increases until their rent reaches the \$25/month threshold. A portion of any new employment income entering the household would be escrowed to go toward the child's educational goals (i.e. college, vocational education, etc.). The established escrow contribution of the family will be based on the goals identified in the family commitment plan. DCHA will explore the possibility of providing a percentage match through other sources, if possible.

While truancy is the critical issue driving this initiative, DCHA recognizes that a holistic approach may be necessary to positively impact the life outcomes of children and their families who are struggling with this issue. Initially, DCHA anticipates the following impacts:

- Parents will improve their economic and employment status.
- Participating students will show greater gains in school outcomes (including reduction in absenteeism/truancy rates, grades and standardized test scores) relative to other low-income students attending their school and other schools. Each participating child will be monitored several times a year through various means (e.g. report cards, district/state assessment scores, case manager communications with teachers and other program partners).
- Parents of students will play a larger role in supporting their child's academic and social growth leading to improved achievement in the project

Status

Approved (FY13) (never implemented); Closed Out (FY23)

DCHA is closing out this activity because the agency refers youth to the District of Columbia Office of the State Superintendent of Education (OSSE) truancy program.

Designation of Elderly-Only Properties

Description/Update

DCHA established a local review, comment and approval process designating properties as Elderly-Only. This replaced the requirement for HUD review of proposed Elderly-Only designation of Public Housing properties with a local review, broad community input and approval by the Board of Commissioners. In addition, under this initiative, designation of Elderly-Only properties automatically renewed from year to year indefinitely from the date of the designation unless otherwise rescinded or modified by the Board of Commissioners. As locally required, implementation of this initiative included adoption of



local regulations outlining the process, which were published in Title 14 of the District of Columbia Municipal Regulations Section 6115.

In FY2004, the following conventional sites were designated as Elderly-Only: Knox Hill, Regency House, Arthur Capper Senior I and Carroll Apartments. That same year Elderly-Only existing designations were extended for units at Wheeler Creek as part of a HOPE VI project and the redeveloped Edgewood Terrace. In FY2007, Elderly-Only units were designated at Henson Ridge as part of a HOPE VI project.

In the FY2011 MTW Plan, it was anticipated that units at Mathews Memorial would be designated as Elderly-Only. However, during FY2011, it was determined that the Elderly-Only designation was not necessary for Matthews Memorial. While there will be units in the overall site that are designated Elderly-Only, as referenced in the DCHA MTW FY2012 Plan, the 35 units for which DCHA is providing Public Housing subsidy will be family units.

DCHA designated seven properties in whole or in part as Elderly-Only.

Status

Implemented (FY04); Closed Out (FY23)

DCHA is closing this initiative in acknowledgement of HUD's decision, as transmitted via HUD's assessment of the District of Columbia Housing Authority report, that the MTW Standard Agreement does not provide the authorization to waive the Designated Housing Plan regulations.

DCHA will submit a Designated Housing Plan for HUD review for applicable sites.

Modifications to Market-Based Rents

Description/Update

The local regulations developed under this initiative simplify the process of providing a work incentive to Public Housing residents. The regulation discontinues the HUD requirements that DCHA:

- Provide all residents information about the market-based and income-based rents associated with the unit in question; and
- Obtain written documentation of their choice of rent calculation method.

Instead, DCHA calculated a resident's income-based rent, compared it to the market-based rent (DCHA's version of flat rents) from a periodically updated rent schedule and automatically charged the resident the lower of the two rent options.

If a family's income decreased between recertifications, residents, regardless of the method used for calculating their rent, could request an interim recertification and the rent charged would be the lower of the two rent calculation options, automatically. There was no longer the requirement that the resident demonstrate a particular hardship to return to income-based rent from market-based rent. In addition, DCHA removed the provision outlined in earlier plans and reports that families on market-based rent recertify every three (3) years. Instead, these families were included in the Public Housing biennial recertification process.

DCHA received approval as part of the FY2016 MTW plan process for the establishment of a **Local Public Housing Market-Based Rent Schedule**. In response to the HUD mandate to establish Public Housing flat



rents at no less than 80% of the HUD established Fair Market Rents (FMR), DCHA was approved to establish a local flat rent (market-based) schedule for its Public Housing communities that more realistically reflected local market conditions at the submarket or neighborhood level by allowing market-based rents to be set at 80% of the DCHA Housing Choice Voucher Program (HCVP) submarket rents.

Upon further review of the impact of basing the DCHA local public housing market-based rent (flat rent) schedule on 80% of the DCHA HCV submarket rents, DCHA proposed and HUD approved to adjust the setting of schedule rents from 80% to 50% as part of the FY2018 MTW Plan. The DCHA local market-based rent schedule and the ability to adjust the HUD FMRs in order to set reasonable payment standards are two tools important to DCHA's efforts to address the issue of affordability in Washington DC. In those "emerging" neighborhoods where our public housing communities are located and the submarket rents have increased to reflect the changes in the surrounding private rental market, it is necessary to set flat rents that balance the local hyper-dynamics of the increased cost of renting in the private market while striving to preserve the idea of flat rents as an incentive for families to move toward self-sufficiency. In an attempt to account for both the realities of the surrounding rental housing and the existing attributes of our public housing stock, DCHA looks to set flat rents at 50% instead of 80%. DCHA would assess the local market-based rent schedule and make appropriate modifications in accordance with annual decisions about adjustments to the agency's payment standards, the local rental market and any changes in the attributes of the agency's public housing properties.

DCHA phased-in any rent payment increases of 35% or more that resulted from this policy change in the event that a family's income-based rent was lower than the new locally established market-based rent but higher than the current market-based rent the family was paying. The phase-in took place at each scheduled biennial recertification and increases did not exceed 35% at each recertification.

Status

Implemented (FY04); Closed Out (FY23)

DCHA is closing this initiative in acknowledgement of HUD's decision, as transmitted via HUD's assessment of the District of Columbia Housing Authority report, that the MTW Standard Agreement does not provide the authorization to set a different flat rent rate or remove resident choice, even when intended to benefit residents.

Requirement to Correct Minor HQS Unit Condition Discrepancies— Tenant/Landlord Self-Certification

Description/Update

Housing Quality Standards (HQS) defines "major and minor" violations. Minor violations do not involve health or safety issues and thereby are marked as "Pass with Comments." Although HQS does not require that an agency re-inspect to insure that minor violations identified as "Pass with Comment" are addressed, DCHA has mandated that minor violations that are "Passed with Comment" are corrected and confirmed through the use of an Inspection Self-Certification form.

Prior to implementation, DCHA had a self-certification procedure, but there were no consequences if the tenant or the landlord did not comply with self-certification. Whether or not the minor violations have been corrected, because the unit passed inspection, the landlord could request and receive a rent increase or the tenant could request and be approved for a transfer to a new unit regardless of who caused the violation. In the event that one party does not self-certify, both tenants and landlords can



(and often do) request a re-inspection. A self-certification process that has consequences should reduce the number of re-inspection requests and thereby save staff time and reduce administration costs.

DCHA will use its MTW authority to implement the following consequences faced by tenants and/or landlords who fail to sign an Inspection Self-Certification form:

- For tenant-caused violations: the tenant will be unable to move with continued assistance.
- For landlord-caused violations: the landlord will not be granted a rent increase.

This change is focused on enforcement. As such, the new flexibility does not necessitate any change to the existing self-certification form.

Status

Implemented (FY12); Closed Out (FY23)

DCHA is closing out this activity because it is obsolete. DCHA does not rely on self-certifications and instead re-inspections occur immediately following the corrective period.

Virtual Housing Quality Standards (HQS) Inspections

Description

DCHA proposed to have its HCVP Inspections Division staff perform routine Housing Quality Standards (HQS) inspections by virtual means, including initial and annual/biennial inspections. The site staff used the pre move-in inspection form as a tool to ensure the most common HQS violations are addressed prior to the virtual inspection. When the virtual inspection was scheduled, HCVP inspections staff provide the virtual standard operating procedure, including a list of all mandatory equipment, form HUD- 52580-A, and the certifications that will be signed after the virtual inspection is completed.

HCVP inspectors made contact, through video conference, with the proxy inspector and guided them through the HQS inspection. The inspection began with visually confirming the unit's address. The inspector then guided the proxy inspector through exterior, common areas and interior inspection by giving instructions about what actions to perform while the inspector completed the inspections checklist, form HUD-52580. After the inspection, the proxy inspector and HCVP inspector completed a certification attesting to taking part in the virtual inspection. The proxy inspector's certification included confirmation of the following:

- The proxy inspector followed the HCVP inspector's instructions to the best of their ability;
- The proxy inspector fully disclosed all deficiencies to the HCVP inspector;
- No smell of natural gas, methane, or noxious gas was present during the inspection;
- The proxy inspector did not record the inspection; and
- There were no life-threatening HQS violations existing in the unit during the time the inspection was conducted.

At lease-up, the voucher holder also signed a certification attesting that at the time of initial possession of the unit, there were no visible issues and unit and appliances were in satisfactory condition. The owner/landlord/management agent provided the voucher holder's certification to HCVP's Housing Program Specialist within 10 business days of lease-up.

Aside from the period covered by the HUD waivers in Notice PIH 2020-5 "COVID-19 Statutory and Regulatory Waivers for the Public Housing, Housing Choice Voucher, Indian Housing Block Grant and Indian Community Development Block Grant programs, Suspension of Public Housing Assessment



System and Section Eight Management Assessment Program,” DCHA continued conducting all quality control, emergency, and complaint inspections in-person.

DCHA believed using virtual inspections improves efficiency and expedites the lease-up process for families in need of housing.

Status

Implemented (FY21); Closed Out (FY23)

DCHA is closing out this activity because 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.

Simplified Utility Allowance Schedule

Description/Update

DCHA simplified the calculation of utility allowances for Housing Choice Voucher participants. The standard utility allowance is based on the dwelling type, the number of bedrooms, the services paid by the tenant, and the fuel type. DCHA implemented a simplified utility allowance schedule based on the bedroom size, heating fuel, and whether the tenant is responsible for paying the water and sewer bill to simplify the rent calculations.

The policy was implemented in all new HCV contracts and at the time of recertifications (either biennial or interim) for current participants. The simplified utility allowance schedule was updated annually, but applied to HCV participants at the time of recertifications. In addition, the DCHA simplified the definition of bedrooms used in the assignment of utility allowances to reflect the lower of the voucher size or physical unit bedrooms rather than the actual size of the physical unit. This follows the same definition used for the assignment of payment standards for HCV participants.

This initiative improved administrative efficiency due to the decrease in time spent computing the correct utility allowance, verifying through inspections and documenting carefully on the Housing Assistance Payment (HAP) Contract. It also helped voucher participants in their unit search since it gave them an exact amount of rental assistance available. Participants could go on DCHA’s website to pull the maximum approved contract rent for the unit they chose, and then apply the new utility allowance formula to get the gross rent. This gross rent could be used to enable the family to calculate the tenant share of rent.

Status

Implemented (FY14); Closed Out (FY24)

DCHA is closing this initiative in favor of following the standard HCV operations requirements of completing a utility allowance study annually and updating the utility allowance schedule accordingly.

Unit Protection Incentive Program

Description/Update

In 2015, the DCHA Housing Choice Voucher (HCV) program established Housing Affordable Living Options (HALO), a program designed to eliminate barriers for DCHA clients that are interested in moving to low-poverty areas by offering a host of incentives. One of the biggest barriers for HCV families is



finding funds to secure a rental unit (via a security deposit). To address this barrier, DCHA HCV is proposing to add to HALO incentives the establishment of a pilot that guarantees funding to cover unit damages for landlords/owners participating in the HALO program. Under the Unit Protection Incentive Program (UPIP), in lieu of a security deposit, landlords/owners agree to DCHA guaranteeing that funds will be made available upon a participant's move-out to cover tenant-caused unit repairs that are beyond normal unit wear and tear. The guaranteed funds will not exceed one month of contract rent for the unit.

Although DCHA's current payment standards meet the rental amounts in many low-poverty areas, rents across the city are extremely high and renters are usually asked to pay a security deposit (equal to first month's rent) before move-in. Most of the HALO families cannot afford the security deposit and typically seek funding from other sources including other city programs. This barrier typically causes families to miss the opportunity to move-in during the timeframe allotted by the landlord/owner. The UPIP will eliminate this obstacle so that families can move-in quickly without the added pressure of coming up with a security deposit.

The UPIP pilot program will be limited to new landlords/owners participating in the HALO program and existing landlord/owners in which a HALO household moves and a HALO household moves into that unit. Landlords/owners will have the option to "opt-in" to the program as a household moves into their unit.

If a HALO participant living where the landlord/owner opted to participate in UPIP decides to transfer to another unit, DCHA will conduct a move-out inspection at no cost to the landlord to identify UPIP eligible tenant-caused damages. If tenant-caused HQS violations exist, the UPIP guaranteed funds will be paid directly to the landlord/owner's contractor as long as the owner keeps the unit in UPIP after the HALO participant moves. DCHA will provide a fee schedule for UPIP allowable repairs. Normal wear and tear will not be covered under the program. UPIP is voluntary and enrolled landlord/owner can opt-out at the end of the lease term, but will forfeit the UPIP funds.

Status

Never Implemented; Closed Out (FY24)

DCHA's HALO program is no longer active. DCHA may consider proposing related initiatives following implementation of the new admin plan in FY2023.



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.

Agency Budget

In addition to the tables provided below, please refer to the Operating Transfers In and Operating Transfers Out information in Appendix B—"Planned Application of MTW Funds—Additional Information" as it identifies the amount that will supplement the MTW Sources and Application of Funds detailed in this section. Combining these amounts yields the sources and uses of funds necessary for a balanced 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	\$ 15,411,943
70600	HUD PHA Operating Grants	\$ 303,311,855
70610	Capital Grants	\$ 23,592,851
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	\$ 767,250
70000	Total Revenue	\$ 343,083,899

* 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	\$ 17,409,779
91300+91310+92000	Management Fee Expense	\$ 22,038,928
91810	Allocated Overhead	\$ -
92500 (92100+92200+92300+92400)	Total Tenant Services	\$ 2,495,188



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
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$ 19,824,314
93500+93700	Labor	\$ 20,247,104
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$ 9,870,568
95000 (95100+95200+95300+95500)	Total Protective Services	\$ 11,657,240
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$ 2,776,774
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$ 9,049,700
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$ 3,741,635
97100+97200	Total Extraordinary Maintenance	\$ -
97300+97350	Housing Assistance Payments + HAP Portability-In	\$ 222,882,172
97400	Depreciation Expense	\$ -
97500+97600+97700+97800	All Other Expenses	\$ -
90000	Total Expenses	\$ 341,993,401
160	Capital Assets, Net of Depr.	\$ -
97400	Depreciation Expense	\$ -
	Total Uses of Fund	\$ 341,993,401
* 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:
The variance of \$1.1 million is immaterial.

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 FY2024, DCHA will use grant funds to achieve the following:

- Fund Public Housing Operations
- Modernize conventional public housing and generally address deferred maintenance issues at DCHA's conventional Public Housing sites
- Supplement operating fund payments to create new and replacement low income housing units. For detail about how this will be done to modernize/redevelop units, see the separate Capital Program for detail
- Supplement Public Housing ACC for Veterans' transitional housing located at a DCHA's Ontario Road
- Create and implement a moving assistance program for voucher holders
- 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.

In addition, DCHA may utilize its MTW flexibility and block grant funds in a Rental Assistance Demonstration (RAD) project(s), upon HUD approval. In June and July 2019, DCHA received five CHAPs from its FY2016 portfolio award and will convert those properties to RAD in FY2023. DCHA submitted three RAD applications for four Public Housing sites in FY14 and the agency has received CHAPs for two of the applications (see the Introduction and RAD Significant Amendment sections of this plan for additional detail). DCHA will be considering application submission for additional sites.

During Faircloth to RAD conversions, DCHA 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. This flexibility is currently planned for use at Bruce Monroe/Park Morton, Kenilworth Courts Phase 1, Barry Farm and Sursum Corda Turnkey and Sibley Townhomes.



Capital Fund

Below is the proposed expenditure plan for FY2024 Capital Funds.

**District of Columbia Housing Authority
Office of Capital Programs
Capital Fund Available for Modernization Fiscal Year 2024**

PROPERTY	LINE ITEM DESCRIPTION	BUDGET VALUE
Richardson Dwellings	Replace Hydronic Baseboard Radiators	\$1,800,000.00
Stoddert Terrace	Full Electrical System Upgrade	\$3,600,000.00
Syphax Gardens	Full Electrical System Upgrade	\$2,220,000.00
	Subtotal for Capital	\$7,620,000.00
FRONT LINE COST	ARCHITECTURAL & ENGINEERING FEES	\$1,000,000.00
FRONT LINE COST	VARIOUS REPAIRS & EMERGENCIES	\$489,000.00
FRONT LINE COST	DEMOLITION	\$650,000.00
FRONT LINE COST	RESIDENT RELOCATION	\$349,985.80
DCHA PROPERTIES	TOTAL GRANT VALUE	\$10,108,985.80

Budget Basis

FY2023 Budget

CAPITAL FUND GRANT	\$20,217,576
OPERATION - 1406	(\$2,021,757.60)
ADMINISTRATIVE FEE - 1408	(\$2,021,757.60)
DEMO/DISPO TRANSITION FUNDING	(\$438,755.00)
DEBT SERVICE - 1490	(\$5,626,320.00)
NET CAPITAL FUNDS AVAILABLE for MODERNIZATION	\$10,108,985.80



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	\$ 13,082,963	\$ 13,000,000
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 \$13,000,000 from the unspent HAP during FY2024 to use in program-related activities which will increase the available unit inventory and accelerate lease ups.

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.		
As reported in the FY2016 MTW Plan, DCHA has updated its LAMP by removing reference to ARRA funding the agency received as all awarded funds have been expended and the grants have been closed. In addition, reference to OMB Circular A-87 has been replaced with its successor regulation 2 CFR 200 with respect to cost classification.		

D. Rental Assistance Demonstration (RAD) Participation

Description of RAD Participation		
In FY2018, DCHA converted Columbia Road/Colorado Road, the agency's first RAD properties. DCHA received approval of the RAD Significant Amendment for the Columbia Road/Colorado Road conversion to project-based vouchers in FY2016. DCHA converted Fairlawn Marshall and Matthews Memorial to project-based vouchers in 2018. DCHA amended its FY2017 Plan in FY2018 to submit the RAD Significant Amendment for these properties. In FY2016, DCHA received 11 CHAPs and one RAD portfolio award. Subsequently, DCHA submitted applications to receive five CHAPs from its FY2016 portfolio reservation—a total of 136 units out of the original portfolio award of 921 units*. The five CHAPs cover Ontario, The Villager, Elvans Road, Montana and Lincoln Road, with conversion planned for FY2024. CHAPs for these five properties were received in June and July of 2018. In FY2021, DCHA received RAD CHAPs for Judiciary House and Potomac Gardens. In FY2022, DCHA received a RAD Conversion Conditional Approval (RCCA) for 101 Faircloth to RAD units for Kenilworth 166 and 44 Faircloth to RAD units for Barry Farm 108. Also in FY2022, DCHA received a RAD CHAP for 148 units at the mixed income Wheeler Creek site. In FY2023, DCHA received an RCCA for 40 Faircloth to RAD units at Park Morton Phase 1. The RAD Significant Amendments for Barry Farm 108, Park Morton Phase 1 and Wheeler Creek are included in the Appendix. DCHA also anticipates using RAD in the future as a tool to fund capital needs and stabilize DCHA properties within the senior and family portfolios. In addition, DCHA plans to explore using RAD to: 1) help achieve the redevelopment goals of projects like Greenleaf, Kenilworth, Garfield Terrace, and Woodland Terrace; 2) make capital improvements and ensure an ongoing stabilized subsidy— Benning Terrace, Harvard Apartments, Carroll Apartments, Potomac Gardens, LeDroit Park Apartments, Kelly Miller Apartments, Langston Terrace and Additions, Stoddert Terrace, Ft. DuPont Dwellings, Sibley Senior, Claridge Towers, Horizon House, and James Creek, and 3) stabilize mixed income properties such as Highland Dwellings, The Bixby, Wheeler Creek, Edgewood, Capitol Gateway Family & Senior, Capper Senior I, Glenncrest, Triangle View, and Henson Ridge, and Nannie Helen. Given the recent guidance issued by HUD, DCHA is considering where the use of Faircloth to RAD may be best leveraged across its portfolio, to include Barry Farm, Park Morton, Kenilworth, Capper, Sibley Townhomes, and Sursum Corda.		
	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.		

* Originally, DCHA received CHAPs for a total of 140 units for the RAD sites to be converted. This number was revised to 136 as part of an amended CHAP.

DCHA Properties with Conversions to RAD Planned for FY2024

DCHA received CHAPs for the following properties in June/July 2018.

Property Name	Number of Units
Elvans Road	20
Lincoln Road	19
The Villager	20
Montana	64
Ontario	13
Total Units	136

DCHA does not anticipate any transfer of assistance, changes to unit composition or reduction in the number of units at any of the above properties it plans to convert.

The five properties in the MELVO project will be financed using Low Income Housing Tax Credits and 4% tax exempt bond financing, the major milestones anticipated are:

- *CHAP Award: June/July 2018*
- *Approved RAD Significant Amendment: FY18 and FY19 MTW Plans*
- *Anticipated Financial Plan Submission: June 2022*
- *Anticipated RCC: September 2022*
- *Estimated Closing: Winter 2023*

For Judiciary House, DCHA is currently spending approximately \$19.6 Million in funds from the District of Columbia to make long-needed improvements to the building in the form of replacement of the building's roof, structural repairs to the underground parking structure, structural repairs to the cantilevered concrete balconies, replacement of building windows, replacement of major building utility infrastructure, and renovating 163 of the 263 units in the building. As part of the RAD conversion, the plan is to finance the renovation of the remaining 100 units and the public spaces utilizing 4% LIHTC and mortgage debt.

- *CHAP Award: June 10, 2021*
- *RAD Significant Amendment: FY23 MTW Plan*
- *Anticipated Financial Plan Submission: October 2023*
- *Anticipated RCC: December 2023*
- *Estimated RAD Closing: February 2024*

For LeDroit Senior, DCHA is continuing to spend approximately \$15.2 Million in capital dollars from the District of Columbia to make long-needed improvements to these buildings. Currently the District funding is anticipated to address most, if not all, of the long-term capital needs to achieve 20-year asset viability. DCHA will consider RAD conversion after rehabilitation is complete.

For Potomac Gardens Senior and Family Mid-Rise, DCHA received its CHAP for 208 units in FY2021 and is currently working with an architect to develop a feasibility study and cost-estimate for the improvements, and then commission them to develop a full set of contract documents for the rehabilitation of these structures. Our plan post-conversion is to finance the full renovation of these buildings utilizing 4% LIHTC and mortgage debt.

- CHAP Award: August 19, 2021
- RAD Significant Amendment: FY23 MTW Plan
- Anticipated Financial Plan Submission: April 2024
- Anticipated RCC: June 2024
- Estimated RAD Closing: August 2024

For Wheeler Creek, DCHA received its CHAP for 148 units in FY2022 and our currently working with current ownership to plan the RAD conversion. The Wheeler Creek buildings are owned by Wheeler Creek Limited Partnership while DCHA retains fee simple ownership of the land pursuant to a 99-year ground lease. An affiliate of E and G Group is the current general partner of the Partnership Conversion under RAD will allow the Partnership to obtain financing and loans to address the property's capital improvement needs, including extensive unit renovations, provide stable long-term operating subsidy funding for the property, and aid in the preservation of Wheeler Creek as a vital source of affordable housing.

- CHAP Award: July 2022
- RAD Significant Amendment: FY24 MTW Plan
- Anticipated Financial Plan Submission: July 2024
- Anticipated RCC: October 2024
- Estimated RAD Closing: January 2025

Faircloth-to-RAD

During FY2022, DCHA submitted and was awarded a portfolio award for 700 Faircloth-to-RAD units.

The first units to be designated within this award were 101 units to Kenilworth Courts Phase 1.

- RCCA: October 2021
- RAD Significant Amendment: FY23 MTW Plan
- Estimated RAD Closing: March 2024

DCHA also intends to leverage this portfolio award for 44 units at Barry Farm.

- RCCA: August 2022
- RAD Significant Amendment: FY24 MTW Plan
- Estimated RAD Closing: November 2024
- Another 50 units were requested January 2023

DCHA also intends to leverage this portfolio award for 40 units at Park Morton.

- RCCA: November 2022
- RAD Significant Amendment: FY24 MTW Plan
- Estimated RAD Closing: March 2025

Resident Rights, Participation, Waiting Lists and Grievance Procedures

Upon conversion of each of these properties to PBV, DCHA will adopt the resident rights, participation, waiting lists and grievance procedures listed in Section 1.6.C and 1.6.D of PIH Notice 2012-32, REV-1. Additionally, DCHA is currently compliant with all fair housing and civil rights requirements and complied with all aspects of the 2006 amended Voluntary



Compliance Agreement.

Impact on Capital Funds

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing PHAs with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, DCHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted to RAD. Through RAD, public housing agencies may access private debt and equity to address capital needs. The capital needs for RAD conversions will be informed by a Physical Conditions Assessment (PCA).

The agency currently pledges approximately 25% of its capital funds to pay debt service on its outstanding CFFP debt. In September 2017, HUD approved a \$3.2MM optional redemption DCHA made to maintain the existing debt service coverage and percentage of capital funds used to pay debt service. The \$3.2MM optional redemption was made in consideration of the agency's RAD and redevelopment plan to keep the agency at 50% of its capital funds toward debt service. Consequently, the agency has planned forward for the anticipated conversion of the units listed above.

Section VI. Administrative

A. Board Resolution and Certifications of Compliance

RESOLUTION 23-30

TO APPROVE THE DISTRICT OF COLUMBIA HOUSING AUTHORITY FISCAL YEAR 2024 MOVING TO WORK PLAN

WHEREAS, the 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 2028 by Congress through the Consolidated Appropriations Act of 2016, 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 2023 MTW Plan has been prepared in accordance with the requirements of Attachment B of the MTW Agreement;

WHEREAS, the proposed capital fund budget for FY2024 is \$20,217,576 and the proposed Capital Funds activities are set forth in the MTW Plan and were discussed in the public hearing and other stakeholder meetings described below.

WHEREAS, RAD Significant Amendments are included in the FY2024 MTW Plan for Barry Farm 108, Park Morton Phase I, and Wheeler Creek.

WHEREAS, the information included in the MTW 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. In addition, the Board must expressly approve any transactions referenced or listed in the MTW 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 2024 MTW Plan (including the proposed use of Capital Funds) has been made available to the public for a 30-day comment period, discussed at a public hearing on May 8, 2023, and comments received were considered.

NOW, THEREFORE, BE IT RESOLVED, that the Board of Commissioners of the District of Columbia Housing Authority hereby 1) approves the DCHA FY2024 MTW Plan for submission to HUD; and 2) authorizes the DCHA Executive Director/Secretary to execute all related certifications and forms;

BE IT FURTHER RESOLVED, the information included in the MTW 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



RESOLUTION 23-30

TO APPROVE THE
DISTRICT OF COLUMBIA HOUSING AUTHORITY
FISCAL YEAR 2024 MOVING TO WORK PLAN

must expressly approve any applications to be submitted for HUD approval and must expressly approve any transactions referenced or listed in the MTW Plan.

ADOPTED by the Board of Commissioners and signed in authentication of its passage, the 14th day of June 2023.

ATTEST:

APPROVED:

Brenda Donald
Executive Director/Secretary

Raymond Skinner
Chairperson

APPROVED FOR FORM AND LEGAL SUFFICIENCY:

Lorry B. Bonds
Sr. Vice President & General Counsel



OMB Approval No. 2577-0216 (exp. 3/31/2024)

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 (06/14/2023), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.

{0041050 -}

form HUD 50900: Standard HUD Metrics (3/2021)



OMB Approval No. 2577-0216 (exp. 3/31/2024)

- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35. ****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.
- (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.

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).*

Brenda Donald

Executive Director

NAME OF AUTHORIZED OFFICIAL

TITLE

6/26/2023

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*

{0041050 -}

form HUD 50900: Standard HUD Metrics (3/2021)



OMB Approval No. 2577-0216 (exp. 3/31/2024)

Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

**** (19) continued**

As of the date hereof, DCHA is substantially in compliance with the requirements of the *Lead Based Paint Poisoning Prevention Act* and 24 CFR part 35, with a Lead Action Plan (the "Plan") to be in full compliance within the time periods prescribed by 24 CFR part 35 wherever possible. This plan was approved by HUD December 26, 2019.

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 approved DCHA's Plan as of December 26, 2019. HUD acknowledges further that, pursuant to the Plan, 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 is currently implementing appropriate interim controls as recommended by the Risk Assessments, within the time periods required by 24 CFR part 35 wherever possible. DCHA has notified HUD of certain locations where it will likely exceed the interim control deadline required by 24 CFR part 35 as well as DCHA's plan to address such locations. 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 has resumed interim control work in residential units and interior common areas as specified in DCHA's HUD approved plan. Based upon HUD's approval of DCHA's Plan, HUD acknowledges that DCHA is substantially in compliance with the *Lead Based Paint Poisoning Prevention Act* and 24 CFR part 35, and approves HUD's Annual Plan for the Moving to Work program, given the importance of DCHA's continuing status as an MTW agency to successfully implement its full compliance with the *Lead Based Paint Poisoning Prevention Act* and 24 CFR part 35.

B. Documentation of the Public Process

DCHA has taken the following steps to ensure a thorough public process in accordance with its MTW Agreement, including a 30 day review period effective April 30, 2023 - May 30, 2023.

Public Comment Period – April 30, 2023 - May 30, 2023

Summary of Notifications and Outreach:

- April 28, 2023: Public notice of availability of MTW Plan for 30-day public comment and notice of Public Hearing published on DCHA website.
- April 30 – May 30, 2023: Public comment period.
- April 30, 2023: Public notice of availability of MTW Plan for public comment and notice of Public Hearing published in *The Washington Post* newspaper. Notice was available in print and online.
- May 1, 2023: Emails to key stakeholders (including the Citywide Advisory Board, Resident Councils, Council of the District of Columbia, DC Office of the Deputy Mayor for Planning and Economic Development cluster agencies, landlords, housing legal advocates) providing notice of the upcoming public process, including the public comment period and public hearing.
- May 1, 2023: Draft plan posted to the Board of Commissioner’s collaboration website, Diligent.
- Week of May 1, 2023: Notice posted at all DCHA-managed sites.
- May 1 – May 30, 2023: Social media on Facebook and Twitter.
- May 3, 2023: Public notice published in *The Washington Times* newspaper. Notice was available in print and online.
- May 4, 2023: Public notice published in *The Washington Informer* newspaper. Notice was available in print and online.
- May 4, 2023: Public notice published in the May edition of the *Hill Rag* magazine. Notice was available in print and online.
- May 5, 2023: Public notice published in *El Tiempo Latino* newspaper. Notice was available in print and online.
- May 20, 2023: Public notice published in *The Afro American* newspaper. Notice was available in print and online.

Meetings, locations and attendance:

- May 5, 2023: Board of Commissioners briefing.
- May 8, 2023: Public Hearing conducted via WebEx and Facebook Live (**6 public participants on WebEx; 98 views on Facebook on hearing day**)



- May 8 – May 30, 2023: recording of Public Hearing available to watch on Facebook. **(312 people reached by the end of the public comment period).**
- May 9, 2023: Resident Advisory Board meeting via Teams online platform **(5 Advisory Board members attended).**
- May 12, 2023: Advocates meeting via Teams online platform **(14 advocates attended).**
- June 14, 2023: Approval by the Board of Commissioners at monthly meeting.

The following pages include the documents listed below:

- Board of Commissioners Meeting Agenda
- Published Public Notices
- Resident Advisory Board Meeting/Public Hearing Agenda
- Resident Advisory Board Meeting Attendance
- Public Hearing WebEx Attendance Record
- Public Hearing Views on Hearing Day
- Public Hearing Views at End of Public Comment Period
- Public Hearing Q & A
- Public Comments Summary



Board of Commissioners Meeting Agenda



DISTRICT OF COLUMBIA HOUSING AUTHORITY STABILIZATION AND REFORM BOARD

BOARD MEETING

Via WEBEX

Wednesday, June 14, 2023

1 PM

A G E N D A

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- | | | |
|-------|--|---------------------------------|
| I. | CALL TO ORDER [MOMENT OF SILENCE] AND QUORUM | <i>Chairman Raymond Skinner</i> |
| II. | OPENING REMARKS | <i>Chairman Raymond Skinner</i> |
| III. | APPROVAL OF MINUTES

May 10, 2023 Board of Commissioners Meeting | |
| IV. | EXECUTIVE SESSION: Personnel Matter | 1 |
| V. | EXECUTIVE DIRECTOR'S REPORT | |
| VI. | CITY-WIDE ADVISORY BOARD REPORT | |
| VII. | RESIDENT TESTIMONY | |
| VIII. | RESOLUTIONS
PUBLIC TESTIMONY ON RESOLUTIONS | |
| | A. RESOLUTION 23 – 29
To Approve Modification of the General Legal Services Contract | |
| | 1. Description of Resolution | |
| | 2. Board Action on Resolution | |
| | B. RESOLUTION 23 – 30
To Approve the District of Columbia Housing Authority Fiscal Year 2024
Moving to Work Plan | |
| | 1. Description of Resolution | |
| | 2. Board Action on Resolution | |
| IX. | GENERAL PUBLIC TESTIMONY | |
| X. | ANNOUNCEMENTS & ADJOURNMENT | |



DCHA Website

Plans and Reports – District of Co x

https://www.dchousing.org/wordpress/about-us/plans-and-reports/

Jenna Cevalasco - On... Board Meeting - O... District of Columbia... Moving to Work (M... FY2022 MTW Repor... SharePoint Occupancy - OneDr... - DCRegs

DCHA District of Columbia Housing Authority

About Us Customers Landlords Business Portfolio Investment Plan News

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PLANS AND REPORTS

NOTICE OF PUBLIC HEARING AND COMMENT PERIOD FOR THE PROPOSED 2024 MOVING TO WORK (MTW) PLAN

The District of Columbia Housing Authority (DCHA) is providing notice of Public Hearing and Comment Period to solicit comments on its 2024 Moving to Work (MTW) Plan. To participate in the FY2024 MTW Plan process, please note the following:

- The Public Hearing will take place online on Monday, May 8, 2023 at 6 p.m. To participate in the live event, please join at https://bit.ly/dchousing_mtw using webinar number 2303 565 6069 and webinar password a536JyMpM5w. This event will also be live streamed on DCHA's Facebook page at <https://www.facebook.com/dchousing>.
- Written comments regarding the MTW Plan will be accepted through Tuesday, May 30, 2023.
- Written comments will be accepted via email at MTW@dchousing.org.
- Alternatively, you can mail comments to: Hanna Koerner c/o DCHA; 1133 North Capitol Street, N.E., Suite 200; Washington, D.C. 20002.
- To request a copy of the MTW plan, please call (202) 681-1487; send an email to MTW@dchousing.org; or [download the draft plan](#).

Current Plans and Policies

- Admissions and Continued Occupancy Policy governing the public housing program
- Administrative Plan governing the voucher program

BACK TO TOP

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Bids & Proposals

DC Housing Authority

NOTICE OF PUBLIC HEARING AND COMMENT PERIOD FOR THE PROPOSED 2024 MOVING TO WORK PLAN

The District of Columbia Housing Authority (DCHA) is providing notice of a Public Hearing and Comment Period to solicit comments on the agency's proposed 2024 Moving to Work (MTW) Plan.

MTW is a HUD program that allows select public housing authorities to design and implement innovative programs and policies with the intent to: 1) reduce costs and improve efficiencies; 2) encourage residents to obtain employment and become economically self-sufficient; and 3) increase housing choices for low-income families. The MTW Plan outlines operating plans for the fiscal year and requests and provides updates regarding MTW flexibilities.

To request a copy of the MTW plan, please call (202) 681-1487, send an email to MTW@dchousing.org, or download from the DCHA website at www.dchousing.org/mtw/.

The Public Hearing will take place online at 6 pm on Monday, May 8, 2023. To join the live event, please join at <https://bit.ly/dchousing-mtw> using webinar number 23033454549 and webinar password 8334yMqM5w. This event will also be live streamed at <https://www.facebook.com/dchousing>.

Comments

Written comments regarding the MTW Plan will be accepted through Tuesday, May 30, 2023. Email your comments to MTW@dchousing.org. Alternatively, you can mail comments to:

Hanna Koerner
c/o DCHA
1133 North Capitol Street NE, Suite 200
Washington, DC 20002

Requesting a Reasonable Accommodation

DCHA strives to host inclusive, accessible events that enable all individuals, including individuals with disabilities, to engage fully. It is the policy of DCHA that all agency-sponsored public meetings and events are accessible to people with disabilities. DCHA is committed to providing equal access to events for all participants & residents with disabilities. If you need a reasonable accommodation, or assistance in participating in a meeting or event due to a disability as defined under the Americans with Disabilities Act, please contact our ADA/504 Program Office at 202-535-1000 or at ADA504@dchousing.org with your complete request. Every reasonable effort will be made to meet your request.

If you need a sign language interpreter or foreign language interpretation or translation, please contact our Office of Customer Engagement at 202-535-1000 or go to www.dchousing.org/language. Please allow at least 5 business days to make the necessary arrangements.

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Legal Notices

FAIRFAX COUNTY WETLANDS BOARD NOTICE OF A PUBLIC HEARING

Pursuant to Title 28.2, Chapter 13, Code of Virginia, and Chapter 116 of the Fairfax County Code, the property owner at 4517 Caribby Lane, Alexandria, VA seeks permit approval for tidal wetland impacts resulting from the construction of a living shoreline located on Dogue Creek generally identified as Tax Map Reference 110-3 ((1)) 0009A.

The Wetlands Board will hold a public hearing to consider this request on May 16, 2023 at 7:00 p.m. in Room 220 – Gum Springs of the Gerry Hyland Government Center, located 8350 Richmond Hwy, Alexandria, VA 22309. Members of the public will be given the opportunity to provide verbal or written comments for this application. If you wish to speak at the hearing you may sign up in advance by calling the Wetlands Board staff at 703-324-1369.

The application may be reviewed prior to the hearing at the Department of Planning and Development, 12055 Government Center Parkway, Suite 730, Fairfax, Virginia 22035 or at <https://www.fairfaxcounty.gov/plan2build/tidal-wetlands-and-shorelines/wetlands-board-meetings>.

Clyde Wilber, Chair
Fairfax County Wetlands Board

The Fairfax County Wetlands Board supports the American with Disabilities Act by making reasonable accommodations for persons with disabilities. If you need accommodations, please contact the Wetlands Board staff 48 hours before hearing. For accommodations, call (703) 324-1366 or TTY 711 (Virginia Relay Center).



Fairfax County is committed to nondiscrimination on the basis of disability in all county programs, services and activities. Reasonable accommodations will be provided upon request. For information, call (703) 324-2865 for the Planning Commission, (703) 324-3151 for the Board of Supervisors, or TTY 711 (Virginia Relay Center).

April 26th, 2023
May 3rd, 2023

AD#71957

Legal Notices

THE DISTRICT OF COLUMBIA HOUSING AUTHORITY

NOTICE OF PUBLIC HEARING AND COMMENT PERIOD FOR THE PROPOSED 2024 MOVING TO WORK PLAN

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May 3, 2023

AD#72482



DC Housing Authority
NOTICE OF PUBLIC HEARING AND COMMENT PERIOD FOR THE
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As they raise the voices of these women, we are excited to hear them raise their own voices on the council."

Abrams is the CEO and managing director of Walker's Legacy, which works to support the economic equality and entrepreneurial prosperity of Black and Brown women. Abrams also co-owns a selection of local restaurants.

Roy is the founder and CEO of Pipeline Equity Inc., an award-winning technology company with the mission of increasing financial performance of companies by closing the intersectional gender equity gap and achieving parity in workplaces.

PR. GEORGE'S GOLF TOURNAMENT

Calling all golf enthusiasts and business leaders! Get ready to tee off and swing into action at the Prince George's County Chamber of Commerce Annual Golf Tournament and Fundraiser.

The fundraiser and tournament is a hole-in-one day filled with networking, friendly competition, and birdies.

The event will be held at the Oak Creek Golf Course in Upper Marlboro, Maryland.

For more information and to register, visit <http://birdease.com/PG-COCGOLF>. **WI**
@JamesWrightjr10

Hill Rag



THE DISTRICT OF COLUMBIA HOUSING AUTHORITY NOTICE OF PUBLIC HEARING AND COMMENT PERIOD FOR THE PROPOSED 2024 MOVING TO WORK PLAN

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Adolph Road right away then right on Riggs Road to parking at Adolph Mill.

3. The Fall Line

Next is the fall line, where the Northwest Branch tumbles over eroded rocks and enters the coastal plain. Two old mills sit right above the fall line, one on each side of Columbia Road. Bring good shoes and a walking stick for your exploration. The next half mile or so downstream will be a series of rocks and waterfalls spaced into a narrow gorge that is hardly passable.

It is a spectacular place, worth exploring! Teddy Roosevelt used to ride by with his mother, on horseback, and considered it second only to Great Falls in the region. Although the scale is about 1/20 that of the Potomac fall line, you are much closer to the crashing water here and feel about to fall in. There is much to explore here, and once it begins to level out, hiking options open up, including a trail over the wooded hills and back to the parking lot if the rock climbing is too much.

The best way to reach this spectacular fall line is to take the Railway west to University Boulevard, then north to take a right at the first major intersection, onto US 29 (Colesville Road) and the Columbia Pike. After about half a mile the road will begin to lead downhill to cross the branch. Pull into parking behind the old mill on the right side and follow the signs to walk to the fall line a short way downstream.

4. Sandy Spring

The last special place has the most interesting history of all. Sandy Spring is a small town in Montgomery County that is named for the farthest place where the river emerges from the ground. This is a pleasant little area at the edge of a woods with the gurgling of the spring surrounded by a stone marker and a few flowering plants. The stream moves into the woods and grows as it heads south.

A century and a half ago, this was a critical point in the Underground Railroad to help escaped slaves reach safe areas. The Quakers were associated with the railroad, so it is not a coincidence that a Quaker meeting house stands along the road, not far from where the



The most distant emerging of the Anacostia River, the Northwest Branch, appears at Sandy Spring.

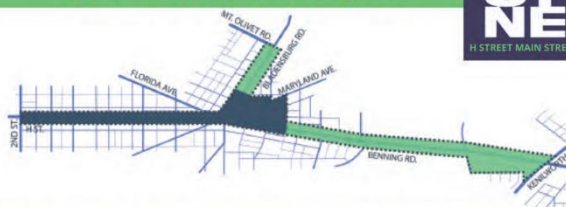
river springs from the ground. Quakers provided facilities to sleep, eat, clean clothes and plan safe routes to the north.

Today, the whole area is a beautiful mix of forests and farmlands rented from the government. As public land it is open to all. If you have a vehicle you must leave it at the Quaker meeting house or the gate at the field that starts down the street. The walk to the spring is about a quarter-mile from the gate along a dirt road; where the road turns right look left to the edge of the first woods to find a fenced area within which the Anacostia springs forth among trees and flowers.

To get to Sandy Spring may seem complicated, but it is a pleasant trip. Take the Railway west to Route 650, New Hampshire Avenue north. Follow this interesting road all the way to Sandy Spring Road (108) west (an intersection with a light). Sandy Spring comes up fast; look for a left turn to the Quaker meeting house and follow that to the field entrance.

Bill Malachuk is a member of the Mayor's Leadership Council for a Cleaner Anacostia River and the retired director of the Chesapeake Bay Program. He also serves on the board of the Friends of the National Arboretum and on the citizen advisory committees for the Chesapeake and the Anacostia. ♦

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ANUNCIO PÚBLICO ▼

Autoridad de Vivienda de DC

AVISO DE AUDIENCIA PÚBLICA Y PERÍODO DE COMENTARIOS PARA EL PLAN PROPUESTO DE TRASLADO A TRABAJO 2024

La Autoridad de Vivienda del Distrito de Columbia (DCHA) les da aviso que habrá una audiencia pública y un período de comentarios para solicitar comentarios sobre el Plan de mudanza al trabajo (MTW) 2024 propuesto por la agencia.

MTW es un programa de HUD que permite a autoridades selectas de vivienda pública diseñar e implementar programas y políticas innovadoras con la intención de: (i) reducir costos y mejorar la eficiencia; (ii) ayudar a los residentes a obtener empleo y ser económicamente autosuficientes; y (iii) aumentar las opciones de vivienda para familias de bajos ingresos. El Plan MTW describe los planes operativos para el año fiscal y solicita y proporciona actualizaciones sobre las flexibilidades de MTW.

Para solicitar una copia del plan MTW, llame al (202) 681-1481; envíe un correo electrónico a MTW@dchahoousing.org; o descargue el sitio web de la DCHA en <https://dcha.org/mtw>.

The Public Hearing will take place online at 6 pm on Monday, May 8, 2023. To join the live event, please join at https://bit.ly/dchahoousing_mtw using webinar number 23015956069 and webinar password 4036449449. This event will also be live streamed at <https://www.facebook.com/dchahoousing>.

Comentarios

Se aceptarán comentarios por escrito sobre el Plan MTW hasta el martes 30 de mayo de 2023. Envíe sus comentarios por correo electrónico a MTW@dchahoousing.org. Como otra opción, puede enviar comentarios por correo a:

Hanna Koerner
c/o DCHA
1133 North Capitol Street NE, Suite 200
Washington, DC 20002

Solicitud de una adaptación razonable

DCHA se esfuerza por organizar eventos inclusivos y accesibles que permitan a todas las personas, incluidas las personas con discapacidades, participar plenamente. Es política de DCHA que todas las reuniones y eventos públicos patrocinados por la agencia sean accesibles para personas con discapacidades. Si necesita una adaptación razonable o asistencia debido a una discapacidad para participar en una reunión o evento, según se define en la Ley de Estadounidenses con Discapacidades, comuníquese con nuestra Oficina del Programa ADA-PDA al 202-535-1000 o a ADA.pda@dchahoousing.org con su solicitud completa. Se harán todos los esfuerzos razonables para cumplir con su solicitud. Si necesita un intérprete de lenguaje de señas o una interpretación o traducción de un idioma extranjero, comuníquese con nuestra Oficina de Congruencia con el Cliente al 202-535-1000 o visite www.dchahoousing.org/language. Permita por lo menos 5 días laborales para hacer los arreglos necesarios.

May 6, 2023 - May 12, 2023 The Afro-American C9

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Code 47-1371(b)(1)(G) purposes only) District of Columbia 1350 Pennsylvania Avenue NW CO Muriel Bowser, Mayor, Washington, DC 20004 Serve Also: District of Columbia 400 6th Street NW CO Brian Schwalb, Attorney General Washington, DC 20001 And ALL OTHER PERSONS THAT HAVE OR CLAIM TO HAVE ANY INTEREST IN REAL PROPERTY, 601 PENNSYLVANIA AVE NW#810 WASHINGTON DC 20004, Square: 0459 Suffix: Lot: 2086, And All unknown owners of the real property described below, their heirs, devisees, personal representatives, executors, administrators, grantless, assigns or successors in right, title, and interest and any and all persons having or claiming to have any interest, including adverse possession, in the leasehold or the fee simple in the real property and premises, situate, lying and being in the District of Columbia described as 601 PENNSYLVANIA AVE NW# 810 WASHINGTON DC 20004, Square: 0459 Suffix: Lot: 2086, assessed to the owner of record listed above,, assessed to the owner of record listed above, Defendants. ORDER OF PUBLICATION In accordance with D.C. Official Code §47-1375 (2001 ed.), the object of this proceeding is to secure the foreclosure of the right of redemption in the following real property located in the District of Columbia to the Plaintiff in this Action: Square: 0281 Suffix: Lot: 2086 which may also be known as " 601	PENNSYLVANIA AVE NW#810 WASHINGTON DC 20004, Square: 0459 Suffix: Lot: 2086, assessed to the owner of record listed above, The Complaint states, among other things, that the amounts necessary for redemption have not been paid. Pursuant to the Chief Judge's Administration Order Number 02-11, it is this day 28th day of January, 2023, ORDERED by the Superior Court of the District of Columbia, that notice be given by the insertion of a copy of this Order in the Washington Afro-American, a newspaper having a general circulation in the District of Columbia, once a week for three (3) successive weeks, notifying all persons interested in the Real Property described above to appear in this Court by the 31st day of May 2023 and redeem the Real Property by payment of \$17148.34 plus interest from the date the Certificate was sold, all expenses provided for by D.C. Code §47-1377 and D.C. Code §47-1361, and all outstanding municipal liens amounts due and owing on the Real Property in accordance with the provisions of D.C. Code §47-1361, or answer the complaint, or thereafter, a final judgment will be entered foreclosing the right of redemption in the Real Property and vesting in the Plaintiff a title in fee simple. /s/Zabrina W. Demson Esq. Clerk of the Court 4/21,4/28,5/5/23 DC Housing Authority NOTICE OF PUBLIC HEARING AND COMMENT PERIOD FOR THE PROPOSED 2024 MOVING TO WORK PLAN The District of Columbia Housing Authority (DCHA) is providing notice of a Public Hearing and Comment Period to solicit comments on the agency's proposed 2024 Moving to Work (MTW) Plan. MTW is a HUD program that allows select public housing authorities to design and implement innovative programs and policies with the intent to: 1) reduce costs and improve efficiencies; 2) encourage residents to obtain employment and become economically self-sufficient; and 3) increase housing choices for low-income families. The MTW Plan outlines operating plans for the future year and requests and provides updates regarding MTW facilities. To request a copy of the MTW Plan, please call (202) 651-1427, send an email to MTW@dchahoousing.org, or download from the DCHA website at www.dchahoousing.org. The Public Hearing will take place online at 8 pm on Monday, May 8, 2023. To join the live event, please join at https://bit.ly/dchahoousing_mtw. Written comments should be submitted by email to MTW@dchahoousing.org or by mail to https://www.dchahoousing.org. Comments will be accepted through Tuesday, May 26, 2023. Email your comments to MTW@dchahoousing.org. Alternatively, you can mail comments to: Hanna Kueper 4th DCHA 1133 North Capitol Street NE, Suite 200 Washington, DC 20002 Requesting a Reasonable Accommodation DCHA strives to host inclusive, accessible events that serve all individuals, including individuals with disabilities. To ensure fully, it is the policy of DCHA that all agency-sponsored public meetings and events are accessible to people with disabilities. DCHA is committed to providing accommodations for all participants, including residents with disabilities. If you need a reasonable accommodation, or assistance in participating in a meeting or event due to a disability as defined under the Americans with Disabilities Act, please contact our ADA Title Program Office at 202-636-1920 or at ADA@dchahoousing.org with your complete request. Every reasonable effort will be made to meet your request. If you need a sign language interpreter to design, facilitate interpretation or translation, please contact our Office of Customer Engagement at 202-636-1920 or go to www.dchahoousing.org/engage. Please allow at least 9 business days to make the necessary arrangements.



Resident Advisory Board/Public Hearing Meeting Agenda

Discussion Topics

- I. Moving to Work (MTW) Overview
- II. Logistics
- III. FY2024 Annual Plan Highlights
- IV. Questions & Discussion



D.C. HOUSING AUTHORITY



Resident Advisory Board Meeting Attendance

1. Summary

Meeting title	CWAB FY2024 MTW Plan Consultation
Attended	13
Start time	5/9/23, 9:52:14 AM
End time	5/9/23, 3:34:01 PM
Meeting duration	5h 41m 48s
Average attendance time	1h 27m 26s

2. Participants

Name	First join	Last leave	In-meeting duration
Hanna Koerner	5/9/23, 9:57:37 AM	5/9/23, 3:34:01 PM	1h 14m 48s
Rosa Burbridge	5/9/23, 9:57:43 AM	5/9/23, 11:13:19 AM	1h 15m 36s
Ester Hardesty	5/9/23, 9:57:43 AM	5/9/23, 11:12:26 AM	1h 14m 43s
Thor Nelson	5/9/23, 9:58:32 AM	5/9/23, 11:17:29 AM	1h 18m 57s
Brian K. Harris	5/9/23, 9:58:35 AM	5/9/23, 11:12:09 AM	1h 13m 33s
Jenna Cevalco	5/9/23, 9:58:38 AM	5/9/23, 10:55:40 AM	57m 1s
Patricia Bishop	5/9/23, 9:59:31 AM	5/9/23, 11:12:17 AM	1h 12m 45s
Andre Gould	5/9/23, 10:02:00 AM	5/9/23, 11:04:57 AM	1h 2m 56s
Hammere Gebreyes	5/9/23, 10:03:32 AM	5/9/23, 11:12:26 AM	1h 8m 53s
Abena Disroe	5/9/23, 10:14:39 AM	5/9/23, 11:42:35 AM	1h 27m 55s
Joyce Kinard	5/9/23, 10:15:38 AM	5/9/23, 3:34:01 PM	5h 18m 23s
Isabel Friedenjohn	5/9/23, 10:21:09 AM	5/9/23, 10:58:11 AM	37m 2s
Isabel F	5/9/23, 10:22:13 AM	5/9/23, 11:16:15 AM	54m 1s



Public Hearing WebEx Attendance Record

Attendees(6) ×			
Q Search attendees		Search	
LS	Lee Simon		
CU	Call-in User_4 (20280...		
CL	Craig london		
M	Moore		
PB	Patricia Bishop		
VB	Veronica Bynum		



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Via webex

Jenna Cervasio - DCHA (she, her, hers)

Barbra Koerner

Thor Nelson

Shenetta Hardeman-Jones

Hammer Gebreyes

FY2024 MTW Plan

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District of Columbia Housing Authority

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Salim-ah Salimah · 10:52

Initiative31 housing affordable living options???? No one knew about this!!!

14h

Salim-ah Salimah · 3:08

Those flexibilities are crucial. Which can negatively affect the residents.

14h

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Public Hearing Views at End of Public Comment Period

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PowerPoint FY24 MTW Annual Plan Briefing - Saved

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Clipboard, Paste, Copy, New Slide, Slides, Font, Paragraph, Drawing, Shapes, Shape Fill, Shape Outline, Shape Styles, Duplicate, Find, Replace, Dictate, Designer, Editing, Dictate, Designer

FY2024 Moving To Work Annual Plan

DCHA

Public Comment Period
April 30, 2023 - May 30, 2023

Slide 1 of 17 English, U.S.

District of Columbia Housing Authority was live.
Published by Cisco Webex Meetings
May 8 at 6:00 PM

FY2024 MTW Plan

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34 Reactions, comments, and shares

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Darin Burns · 23:12
How much longer will I have to wait after 2 decades and I

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Public Hearing Q & A

Proposed FY2024 MTW Annual Plan

Frequently Asked Questions

May 9, 2023

Governance

Q. Who are the decision-makers for Moving to Work?

A. DCHA's Moving to Work (MTW) Standard Agreement with HUD outlines the flexibilities DCHA may exercise as an MTW Agency. With input from stakeholders throughout the year and, more robustly, during the annual planning process, DCHA determines how the Agency proposes to leverage those flexibilities in the year ahead. DCHA submits its plans for leveraging MTW flexibilities to HUD via the Agency's MTW Annual Plan, receiving approval so long as the plan aligns with the stipulations in the MTW Standard Agreement.

To see DCHA's MTW Standard Agreement, please visit
https://www.hud.gov/sites/documents/DOC_10184.PDF.

Q. Who is the Citywide Advisory Board?

A. The Citywide Advisory Board (CWAB) is an elected body of resident leaders from across the portfolio. Its primary role is consulting with DCHA on the Agency's Moving to Work (MTW) Annual Plan and demolition/disposition applications.

Development

Q. When will Kelly Miller go thru RAD?

A. DCHA has not yet submitted a RAD application to HUD for Kelly Miller. The Agency is considering applying for the 40 walk-up units at the Kelly Miller Townhomes in FY2024. Before applying, the Agency must deliver notice to residents and conduct two resident meetings to discuss residents' rights, basic information about RAD, and conversion plans. For additional information about the RAD conversion process, please refer to HUD's RAD Conversion Fact Sheet at
https://www.hud.gov/sites/dfiles/Housing/documents/RADResidentFactSheet_3_RADConversionProcess.pdf.

Updated Admissions and Continued Occupancy Policy (ACOP) and Administrative Plan

A number of questions were asked regarding policies – including lease agreements, flat rents and rent reasonableness determinations – updated in the Admissions and Continued Occupancy Policy (ACOP) and Administrative Plan earlier this spring for which DCHA is now electing to use HUD's standard process rather than MTW Authority.

For additional information about these items, please refer to the materials on DCHA's website at <https://www.dchousing.org/wordpress/about-us/plans-and-reports/>. DCHA is currently training staff on the new policies and procedures and will conduct information campaigns for residents and participants following this training and as the new policies and procedures take effect.

Other DCHA Programs

Q. Why not train residents for Section 3?

A. Section 3 is an important procurement requirement through which DCHA and its contractors offer job, sub-contracting, and training opportunities to DCHA clients and other low-income residents of the District of Columbia. In addition to Section 3 opportunities, DCHA uses its MTW single-fund flexibility and partnerships with numerous organizations to provide training opportunities through the EnVision Center, including nationally-recognized certification programs through the University of the District of Columbia (UDC) and Cisco Networking Academy, painting and OSHA 10 certifications, food handlers', CPR and first aid certifications, financial literacy courses, job search assistance including resume support and referrals, and more. Additionally, DCHA offers a modified apprenticeship training program to directly provide on-the-job, earn-as-you learn opportunities to DCHA clients.

Q. What was Housing Affordable Living Options (HALO)?

A. Originally, DCHA created HALO using its MTW single-fund flexibility to assist its eligible voucher program families in moving to opportunity areas in the District of Columbia. DCHA no longer operates its Housing Affordable Living Options (HALO) program since the agency works with all voucher holders to meet their housing goals.



Public Comments Summary

In addition to the discussion and questions from the public hearing, which are shared on the previous page, DCHA received public comments from 8 community members/organizations. DCHA's response to these comments follows.

Rent Reasonableness

DCHA received three comments regarding concerns about the potential negative impact a lack of transparency into rents could have on the voucher market, including landlord willingness to go through the voucher lease-up process rather than renting to market-rate clients and difficulty securing financing for renovations.

DCHA Response: DCHA is moving to an industry-standard third-party database to make rent reasonableness determinations based on comparable units. Additional information about implementation of the new rent reasonableness methodology will be available as the Agency conducts outreach regarding this policy in summer 2023.

Capping Rent Decreases

DCHA received one comment requesting that DCHA use the same criteria for rent decreases as rent increases.

DCHA Response: Determining that the rent to the owner is reasonable in comparison to rent for other comparable unassisted units is a HUD requirement. DCHA is minimizing the impact of rent decreases by holding harmless all previously determined rents until a new rent reasonableness determination is made at initial lease up and/or upon an owner's request for a rent increase. Additional information about implementation of the new rent reasonableness methodology and associated rent increases/decreases is available on the Agency's website and will be presented in public meetings the week of June 19, 2023.

Work Requirements

DCHA received one comment encouraging DCHA to take advantage of the flexibilities granted by the MTW program to eliminate any and all work requirements for DC residents participating in DCHA programs, such as those included in the homeownership program.

DCHA response: Home ownership is a significant financial commitment; requiring earned income in the household ensures program participants have a source of income to continue to pay their mortgage, maintain their home and achieve the goal of self-sufficiency.

Compliance with MTW requirements

DCHA received a comment stating that it has not been compliant with the Moving to Work requirements for several years.

DCHA response: DCHA has not met the substantially the same requirement, which states that MTW agencies must continue to assist substantially the same total number of eligible low-income families as would have been served absent the MTW Demonstration. DCHA has submitted a corrective action plan to HUD, which details the agency's efforts and plans to increase occupancy in public housing and voucher utilization over the course of this year.

Unit conditions

DCHA received a comment stating that DCHA deliberately neglects property conditions, public safety, and public health and that it should be placed under federal receivership to protect the constitutional and housing rights of its residents.

DCHA response: DCHA strives to provide safe, affordable and decent housing for all of our residents. To improve the quality of life for our residents and also address HUD's findings about property conditions, earlier this year, DCHA kicked off an Urgent Needs Campaign, a comprehensive inspections and maintenance strategy across our housing portfolio. As of June 1, DCHA had inspected more than 3,000 units.

Redevelopment Plans

DCHA received a comment stating that HUD should not approve the FY24 Greenleaf redevelopment plans and place redevelopment on hold indefinitely.

DCHA response: Planning for Greenleaf redevelopment has been ongoing since 2015. Residents and community stakeholders have been involved throughout the planning process. The FY23 MTW plan only includes the long-term goal to redevelop Greenleaf and replace all 493 units. Specific details for each phase of redevelopment will be submitted to the DCHA Board and HUD for review and approval on a phase-by-phase basis. Rehabilitation of Greenleaf Senior will be the first phase of redevelopment and will preserve over 212 units and is necessary to improve the physical condition of the buildings.

Request for extension of comment period

One commentor requested an extension of the comment period.

DCHA response: In order to ensure timely submission of the FY2024 MTW Plan to HUD, DCHA is unable to extend the public comment period. DCHA welcomes public comment at monthly Board of Commissioners meetings and in several other stakeholder meetings each month. If you have questions or concerns throughout the plan year, you are also welcome to email Hanna Koerner who manages our MTW Plan and process. Her email is HKoerner@dchousing.org.

Request for additional funds for Syphax Gardens

DCHA received a comment requesting a larger allocation of funds for upgrades and repairs to Syphax Gardens which will help save and improve lives and living conditions.

DCHA response: DCHA prioritizes all capital improvements that improve life safety and resident health through its annual capital budget planning process. On Syphax Gardens the following improvements have been scheduled for repair in the FY23 and FY24 capital budgets: repair/replace aluminum windows, replace hydronic radiators and piping.

HUD should overhaul MTW program for DCHA

DCHA received a comment stating that HUD should require DCHA to substantially overhaul its Moving to Work demonstration program. Specifically, it should dramatically reduce the extremely high approved rents that, ironically, enable voucher holders to afford apartments that most District renters without housing vouchers cannot afford.

DCHA response: Effective July 1, 2023, the DC Housing Authority (DCHA) is modifying the process for determining rent reasonableness and utility allowances to conform with HUD guidelines. When a Request for Tenancy Approval (RTA) is submitted, DCHA will use AffordableHousing.com's software to determine whether the contract rent proposed by the owner is reasonable. This will require landlords to submit information about the location, size, type and age of the unit, as well as some amenities and utilities provided by the owner.

MTW implementation requires oversight

DCHA received a comment that the MTW plan approval by HUD should require greater transparency and very strict oversight by HUD or a court-appointed monitor.

DCHA response: DCHA's MTW Plan – and any substantial amendments to the plan – require HUD review and approval.

Opposition of RAD for James Creek

A commentor stated that the HUD report from 2022 provided strong evidence that DCHA doesn't provide oversight over RAD conversion. A RAD conversion would mean that the Resident Council Body would cease existing. Residents would lose many protections because they would no longer be protected under the DCHA policies. Likewise, the property would lose HUD dollars -Resident Participation Funds, programs and services related to health and wellness. Given the many problems in the HUD report, DCHA should focus on quality housing and repairs over developer's interest.



DCHA response: James Creek is not currently in the pipeline for a RAD conversion, though that could change. Nonetheless, DCHA remains focused on its mission: to provide quality affordable housing to extremely low to moderate income households, foster sustainable communities, and cultivate opportunities for residents to improve their lives.

Even after a RAD conversion, property owners must continue to recognize legitimate resident organizations, provide funding to support these organizations, and give reasonable consideration to the concerns raised by these organizations. After a RAD conversion, the property owner must continue to provide resident participation funding in the amount of \$25 per occupied unit per year for resident education, organizing around tenancy issues, and training activities.



C. Planned or Ongoing Agency-Directed Evaluations of the Demonstration

As part of DCHA's participation in the HUD sponsored Rent Reform Demonstration (HCVP), MDRC, a research organization contracted by HUD, conducted an evaluation of DCHA's initiative that concluded in September 2019 (see Section IV. Approved MTW Activities, Closed Out Activities for a description of the initiative).



D. Lobbying Disclosures

Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 11/30/2023)

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. 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.

Applicant Name

District of Columbia Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Program Block Grant

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

Brenda Donald

Title

Executive Director

Signature

Date (mm/dd/yyyy)

06/26/2023

Previous edition is obsolete

form HUD 50071 (01/14)



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;
1. Professional services;
2. Utilities (gas, water, electric, other utilities expense);
3. Real estate taxes;
4. Insurance;
5. Bank charges;
6. Staff training;
7. Interest expense;
8. Contract cost for CDBG; and
9. 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: Planned Application of MTW Funds—Additional Information

Estimated Sources of MTW Funding for the Fiscal Year		
Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
10093	Operating Transfers In*	\$ 0

Estimated Application of MTW Funding for the Fiscal Year		
Application		
FDS Line Item	FDS Line Item Name	Dollar Amount
10094	Operating Transfers Out*	\$ 0



Estimated Sources of NON-MTW Funding for the Fiscal Year

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$-
70600	HUD PHA Operating Grants	\$ 37,911,369
70610	Capital Grants	\$-
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$-
70800	Other Government Grants	\$-
71100+72000	Interest Income	\$-
71600	Gain or Loss on Sale of Capital Assets	\$-
71200+71300+71310+71400+71500	Other Income	\$ -
70000	Total Revenue	\$ 37,911,369

Estimated Application of NON-MTW Funding for the Fiscal Year

Application		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$ 1,686,111
91300+91310+92000	Management Fee Expense	\$ 2,693,092
91810	Allocated Overhead	\$-
92500 (92100+92200+92300+92400)	Total Tenant Services	\$ -
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$-
93500+93700	Labor	\$-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$-
95000 (95100+95200+95300+95500)	Total Protective Services	\$-
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$-
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	\$ 32,866,094
97400	Depreciation Expense	\$-
97500+97600+97700+97800	All Other Expenses	\$-
90000	Subtotal Expenses	\$ 37,245,297
10094	Operating Transfers Out	\$-
90000 + 10094	Total Expenses	\$ 37,245,297
160	Capital Assets, Net of Depr.	\$-
	Total Uses of Fund	\$ 37,245,297

*as supplemental information to Section V (Planned Application of MTW Funds)



Estimated Sources of LOCAL Funding for the Fiscal Year

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$ -
70600	HUD PHA Operating Grants	\$ -
70610	Capital Grants	\$ -
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$ -
70800	Other Government Grants	\$ 190,217,743
71100+72000	Interest Income	\$ -
71600	Gain or Loss on Sale of Capital Assets	\$ -
71200+71300+71310+71400+71500	Other Income	\$-
70000	Total Revenue	\$ 190,217,743

Estimated Application of LOCAL Funding for the Fiscal Year

Application		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$ 5,620,371
91300+91310+92000	Management Fee Expense	\$ 13,485,336
91810	Allocated Overhead	\$-
92500 (92100+92200+92300+92400)	Total Tenant Services	\$-
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$-
93500+93700	Labor	\$-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$-
95000 (95100+95200+95300+95500)	Total Protective Services	\$-
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$-
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	\$ 170,807,083
97400	Depreciation Expense	\$-
97500+97600+97700+97800	All Other Expenses	\$-
90000	Subtotal Expenses	\$ 189,912,790
10094	Operating Transfers Out	\$-
90000 + 10094	Total Expenses	\$ 189,912,790
160	Capital Assets, Net of Depr.	\$-
	Total Uses of Fund	\$ 189,912,790

*as supplemental information to Section V (Planned Application of MTW Funds)



Estimated Sources of COCC Funding for the Fiscal Year

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$-
70600	HUD PHA Operating Grants	\$-
70610	Capital Grants	\$-
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$ 33,467,525
70800	Other Government Grants	\$-
71100+72000	Interest Income	\$-
71600	Gain or Loss on Sale of Capital Assets	\$-
71200+71300+71310+71400+71500	Other Income	\$ 6,278,477
70000	Subtotal Revenue	\$ 39,746,002
10093	Operating Transfers In	\$-
700000 + 10093	Total Revenue	\$ 39,746,002

Estimated Application of COCC Funding for the Fiscal Year

Application		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$ 34,253,723
91300+91310+92000	Management Fee Expense	\$-
91810	Allocated Overhead	\$-
92500 (92100+92200+92300+92400)	Total Tenant Services	\$-
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$ 93,000
93500+93700	Labor	\$ 233,093
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$ 207,500
95000 (95100+95200+95300+95500)	Total Protective Services	\$-
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$ 160,219
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$ 4,550,000
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$-
97100+97200	Total Extraordinary Maintenance	\$-
97300+97350	Housing Assistance Payments + HAP Portability-In	\$-
97400	Depreciation Expense	\$-
97500+97600+97700+97800	All Other Expenses	\$-
90000	Total Expenses	\$ 39,497,535
10094	Operating Transfers Out	\$-
90000 + 10094	Total Expenses	\$ 39,497,535

*as supplemental information to Section V (Planned Application of MTW Funds)



Appendix C: 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	1
Lincoln Heights	3
Lincoln Road	1
Sibley Plaza	1
Total	19



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

DCHA overhauled its Admissions and Continued Occupancy Policy (ACOP) and Administrative Plan in FY2023. No further changes are proposed at this time. DCHA intends to review its policies annually. DCHA intends to include an update in its FY2025 MTW Plan.

Appendix E: Lead Abatement Action Plan Update

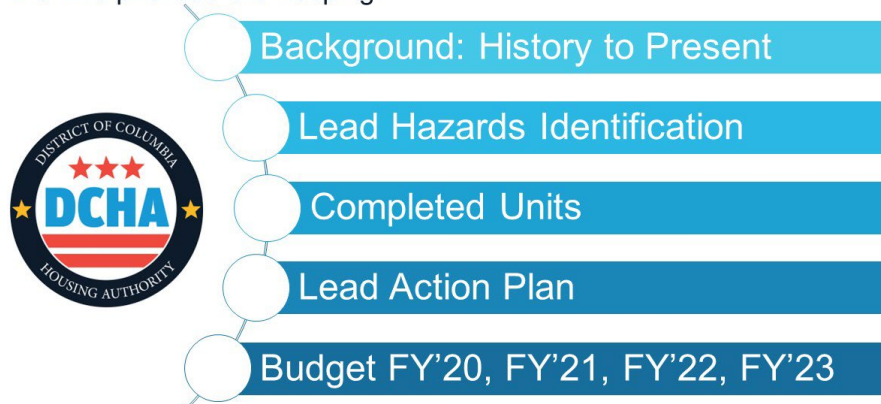
Lead Abatement Action Plan Update



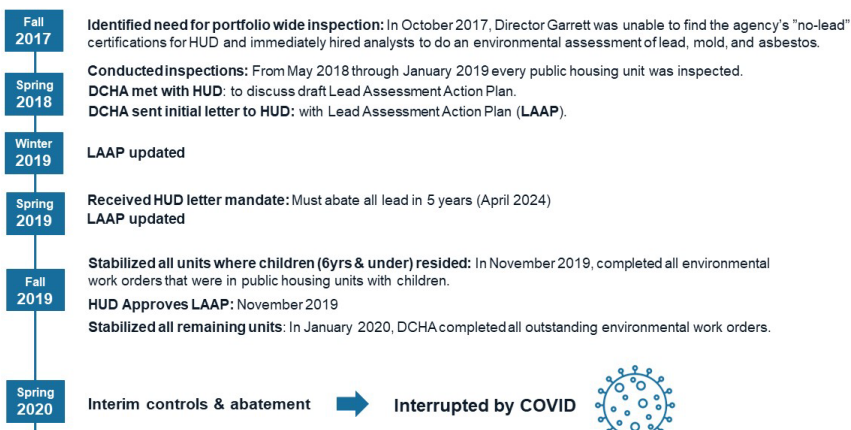
March 2023

Lead Abatement Action Plan

DCHA's priorities are keeping:



Background: Timeline



Background: HUD Guidance

HUD provided additional guidance for compliance with Hazard Reduction (24CFR.35.1120)

✗ No waivers were granted to DCHA for completion of the Lead Assessment Action Plan

✗ No federal money available to assist DCHA in addressing these conditions.

- HUD requested a 5-year compliance plan



Background: Environmental Risk Strategy



Faced a crisis in 2017

Goals:

1. Protect the health and safety of our residents
2. Mitigate risk to DCHA
3. Prudent fiscal stewards of the public dollar



Conducted 5450 visual inspections & categorized properties



Started interim controls

Closed out all environmental work orders

Background: HUD & Risk Assessments



HUD Guidance. Based upon initial HUD Guidance, we decided to take a conservative approach to cost estimating.



Risk Assessment I. Professional 3rd party risk assessors were hired and conducted a report using the following conservative methodology: *If one window had lead, all windows on the property had lead.*



HUD Guidance. Based upon HUD Guidance, DCHA conducted Risk Assessment II



Risk Assessment II. Our Risk Assessment I numbers were **too large** compared to the national average and therefore an additional assessment was needed.

Background: Right Sizing Cost Estimates



Scope and cost. Four professional 3rd party contractors that specialize in lead relied on the risk assessment and made aired on the conservative side when projecting initials scope and cost.



Actual cost. When initial interim control work began it became apparent that the cost estimates were inflated.



Moving forward. As a result, we are refined our estimates and scopes of work.



Protecting reserves. As, total costs have come down, allowing us to do more with less.

Background: Summary

Stabilized Portfolio, protected at-risk children, & met our immediate goals



Families with children 6 years or younger:

Performed interim controls in the unit
or
Relocated family to another unit with no lead hazards



Met Our Immediate Goals:

1. Protect the health and safety of our residents
2. Mitigate risk to DCHA
3. Prudent fiscal stewards of the public dollar



Initiated Lead Action Plan to Complete All Properties by 2023.

Background: Summary

Stabilized Portfolio, protected at-risk children, & met our immediate goals

Families with children 6 years or younger:

Performed interim controls in the unit
or
Relocated family to another unit with no lead hazards

Met Our Immediate Goals:

1. Protect the health and safety of our residents
2. Mitigate risk to DCHA
3. Prudent fiscal stewards of the public dollar



Initiated Lead Action Plan to Complete All Properties by 2024.

Lead Hazards: 4 Categories/Types

Categories and Work Required for Each Hazard Type

No Hazard

- No Known Hazard
- No testing required
- No settled dust-lead or lead based hazards exist in the unit

Lead Dust

- Lead-Dust Exist
- Certified Contractor to clean lead-dust
- Lead wipe testing required with subsequent occupancy

Interim Control

- Non-Permanent Mitigation Strategy
- Based upon encapsulation of the risk
- Painting, specialized cleaning, clearance, ongoing lead-based paint maintenance activities
- Risk assessments every two-years
- Annual visual inspections

Abatement

- Lead removed or encapsulated
- Removal of lead based-paint and dust through replacement, encapsulation*, enclosure, and/or paint removal

*if encapsulated testing bi-annually required

Lead Hazards: Current Units Property Status (2019)

Properties Organized by Risk Assessment Lead Categories

No Hazards:

- Evans Road
- Fort Lincoln
- Highland Dwellings
- Hopkins Apartments
- Lincoln Road
- Marigold
- Potomac Gardens Family
- Potomac Gardens Senior
- Regency House
- Sibley Plaza
- Sursum Corda

Dust Only:

- Colorado Apartments
- Judiciary House
- Knox Hill
- Ontario Road
- Woodland Terrace WU

Interim Controls (IC):

- Garfield Terrace Family
- Greenleaf Senior
- Sursum Corda TH
- Garfield Terrace Senior
- LeDroit Walkups
- Richardson Dwellings
- Kelly Miller Walk-Ups
- Stoddert Terrace
- Lincoln Heights WU
- Greenleaf Additions
- Greenleaf Extension
- Greenleaf Gardens
- Fort Dupont Additions
- Kenilworth Walk-Ups
- Woodland Terrace TH
- Fort DuPont Dwellings
- Lincoln Heights TH

Abatement:

- Claridge Towers
- Horizon House
- James Apartments
- Montana Terrace
- Park Morton
- Carroll Apartments
- Harvard Towers
- LeDroit Senior
- Kelly Miller TH
- Benning Terrace Townhomes
- Benning Terrace Walk Ups
- Kentucky Courts
- Langston Additions
- Langston Terrace
- James Creek
- The Villager
- Syphax Gardens

Lead Hazards: Completed Properties/Units Status (2022)

Properties Organized by Risk Assessment Lead Categories

No Hazards:

- Evans Road
- Fort Lincoln
- Highland Dwellings
- Hopkins Apartments
- Lincoln Road
- Marigold
- Potomac Gardens Family
- Potomac Gardens Senior
- Regency House
- Sibley Plaza
- Sursum Corda

Dust Only:

- Colorado Apartments
- Judiciary House
- Knox Hill
- Ontario Road
- Woodland Terrace WU

Interim Controls (IC):

- Garfield Terrace Family
- Sursum Corda TH
- LeDroit Walkups
- Kelly Miller Walk-Ups
- Lincoln Heights WU
- Greenleaf Additions
- Greenleaf Extension
- Fort DuPont Dwellings
- Lincoln Heights TH

Abatement:

- Horizon House
- James Apartments
- Park Morton
- Carroll Apartments
- Harvard Towers
- Kelly Miller TH
- Kentucky Courts
- James Creek
- The Villager
- Syphax Gardens

Lead Hazards: Remaining Properties/Units to Be Completed

Properties Organized by Risk Assessment Lead Categories

Interim Controls (IC):

- Greenleaf Senior
- Garfield Terrace Senior
- Richardson Dwellings
- Stoddert Terrace
- Greenleaf Gardens
- Fort Dupont Additions
- Kenilworth Walk-Ups
- Woodland Terrace TH

Abatement:

- Claridge Towers
- Montana Terrace
- LeDroit Senior
- Benning Terrace Townhomes
- Benning Terrace Walk Ups
- Langston Additions
- Langston Terrace
- Carroll Apartments
- Kentucky Courts

Budget: FY'2020 Actual Spending \$2.64M

Expenses



Properties Impacted:

- Columbia Road
- Carroll Apartment
- Fort Dupont Additions
- Fort DuPont Dwellings
- Fort Lincoln
- Greenleaf Gardens
- Greenleaf Senior
- Highland Additions
- Hopkins
- James Creek
- Judiciary House
- Kelly-Miller Walk Ups
- Kenilworth Courts
- Kentucky Court*
- Knox Hill
- Langston Terrace
- Langston Additions
- LeDroit Senior
- Montana Terrace
- Park Morton
- Potomac Gardens
- Regency House
- Richardson Dwellings
- Sibley Senior
- Woodland Terrace TH
- Claridge Tower

\$219K Risk Assessment

\$429K Relocation

\$313K Mold Remediation

\$223K Painting & Plastering

\$1,054K Interim Controls

\$400K Indirect Expenses

Lead Hazards: Properties that are Completed with Remediation

No	Property Name	Hazard Location	Method
1	Fort Dupont Addition	Exterior	Interim Controls
2	Carroll Apartments	Common Areas / Exterior / Units	Abatement
3	Claridge Towers	Common Areas / Exterior / Units	Abatement
4	Fort Dupont Addition	Exterior	Interim Controls
5	Garfield Terrace Family	Exterior/ Interior	Interim Controls
6	Greenleaf Addition	Exterior/ Interior	Interim Controls
7	Greenleaf Extension	Exterior/ Interior	Interim Controls
8	Harvard Towers	Exterior/ Interior	Abatement
9	Highland Addition	Exterior/ Interior	Abatement
10	Horizon House	Exterior/ Interior	Abatement
11	James Apartment	Exterior/ Interior	Abatement
12	James Creek	Exterior	Abatement
13	Kelly Miller (TH's)	Exterior	Interim Controls
14	Kelly Miller (WU's)	Exterior/ Interior	Interim Controls
15	Kenilworth (WU's)	Exterior/ Interior	Abatement
16	LeDroit Family (WU's)	Exterior/ Interior	Abatement
17	Lincoln Heights (TH's)	Exterior	Interim Controls
18	Lincoln Heights (WU's)	Exterior	Interim Controls
19	Montana (TH's)	Exterior	Abatement
20	Park Morton	Exterior/ Interior	Abatement
21	The Villager	Exterior/ Interior	Abatement

New Projects Initiated for Common Areas and Exteriors

10 projects have been initiated to abate LBP hazards in common areas and exteriors of 10 properties below. By the completion of these projects, all common areas and exteriors of properties in the entire portfolio would be free of LBP hazards.

No	Property Name	Method	Scope of Work	Estimated Cost	Source of Fund	Estimated Start	Estimated Completion
1	Benning Terrace (WU's)	Abatement	Common areas	\$50,000	Capital Funds	2/20/2023	6/31/2023
2	Fort Dupont Dwellings (WU's)	Abatement	Common areas & exterior	\$130,000	Capital Funds	2/20/2023	6/31/2023
3	Garfield Terrace Senior	Abatement	Common areas	\$55,000	Capital Funds	1/20/2023	6/31/2023
4	Greenleaf Senior (Highrise)	Abatement	Common areas	\$285,000	Capital Funds	2/20/2023	6/31/2023
5	Langston Terrace	Abatement	Common areas	\$170,000	Capital Funds	2/20/2023	6/31/2023
6	LeDroit Senior Apartments	Abatement	Exterior of units	\$467,000	Capital Funds	2/20/2023	6/31/2023
7	Montana (WU's)	Abatement	Common areas	\$120,000	Capital Funds	2/20/2023	6/31/2023
8	Richardson Dwellings (WU's)	Abatement	Common areas & exterior	\$72,000	Capital Funds	2/20/2023	6/31/2023
9	Stoddert Terrace (WU's)	Abatement	Common areas & exterior	\$120,000	Capital Funds	2/20/2023	6/31/2023
10	Woodland Terrace (WU's)	Abatement	Common areas	\$200,000	Capital Funds	2/20/2023	6/31/2023

Budget: HUD/DC Capital to Fund the Remaining LAP: FY' 22&23

Property	Category	Project Type	Budget *	Summary Description
Benning Terrace TH	Lead Abatement	Rehabilitation	\$3,111,000	Interior and Exterior of Units
Benning Terrace WU	Lead Abatement	Rehabilitation	\$2,744,854	Common Areas, Interior, and Exterior of Units
Fort Dupont Dwellings	Interim Control	Rehabilitation	\$151,000	Common Areas, Interior, and Exterior of Units
Garfield Terrace Senior	Interim Control	Rehabilitation	\$1,780,000	Common Areas, Interior, and Exterior of Units
Greenleaf Gardens	Interim Control	Rehabilitation	\$673,000	Common Areas, Interior, and Exterior of Units
Greenleaf Senior	Interim Control	Rehabilitation	\$1,492,000	Common Areas, Interior, and Exterior of Units
Kenilworth Courts	Interim Control	Rehabilitation	\$445,000	Common Areas, Interior, and Exterior

Budget: HUD/DC Capital to Fund the Remaining LAP: FY' 22&23

Property	Category	Project Type	Budget *	Summary Description
Kentucky Courts	Lead Abatement	Rehabilitation	\$115,000	Common Areas, Interior, and Exterior
Langston Addition	Lead Abatement	Rehabilitation	\$56,000	Exterior and Roof
Langston Terrace	Lead Abatement	Rehabilitation	\$6,102,000	Common Areas and Interior
Le Droit Senior Apartments	Lead Abatement	Rehabilitation	\$748,000	Common Areas, Interior, and Exterior of Units
Montana Walkups	Lead Abatement	Rehabilitation	\$442,000	Common Areas, Interior, and Exterior
Richardson Dwellings	Interim Control	Rehabilitation	\$1,201,000	Common Areas, Interior, and Exterior of Units
Stoddert Terrace	Interim Control	Rehabilitation	\$86,000	Common Areas, Interior, and Exterior
Woodland Terrace	Interim Control	Rehabilitation	\$911,000	Common Areas, Interior, and Exterior of Units

* For the projects that are in progress, part of the budget has been incurred.



Remaining Remediation Work Timeline

Remaining Planned Remediation		FY 2023												FY 2024											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep			
1	Benning Terrace (TH's)	Abatement	Scoping	Relocation										Abatement											
2	Benning Terrace (WU's)	Abatement	Scoping	Relocation										Abatement											
3	Fort Dupont Dwellings	Interim Control		Scoping					Relocation				Interim Control					Closeout							
4	Garfield Terrace Senior	Interim Control		Scoping					Relocation				Interim Control												
5	Greenleaf Family	Abatement	Scoping						Abatement				Closeout												
6	Greenleaf Gardens (TH's)	Interim Control		Scoping					Relocation				Interim Control					Closeout							
7	Greenleaf Senior	Interim Control		Scoping					Relocation				Interim Control												
8	Kenilworth Courts	Interim Control				Interim Control						Closeout													
9	Kentucky Courts	Abatement				Abatement						Closeout													
10	Langston Addition	Abatement		Scoping		Relocation							Abatement								Closeout				
11	Langston Terrace	Abatement		Scoping		Relocation							Abatement								Closeout				
12	LeDroit Senior Apartments	Abatement		Scoping					Relocation				Abatement						Closeout						
13	Montana Walkups	Abatement			Scoping					Relocation			Abatement							Closeout					
14	Rickardson Dwellings	Interim Control		Scoping					Relocation				Interim Control								Closeout				
15	Stoddert Terrace	Interim Control			Scoping					Relocation			Interim Control								Closeout				
16	Syphax Gardens	Abatement			Scoping					Relocation			Abatement								Closeout				
17	Woodland Terrace	Interim Control			Scoping					Relocation			Interim Control								Closeout				



Appendix F: RAD Significant Amendment for Barry Farm 108

The District of Columbia Housing Authority (DCHA) was a successful applicant in the Rental Assistance Demonstration (RAD) using Faircloth to RAD. As a result, the DCHA will be converting 44 public housing units at Barry Farm 108 to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-3 and any successor Notices. Upon conversion to Project Based Vouchers, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2012-32, REV-3; and Joint Housing PIH Notice H-2014-09/PIH-2014-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, DCHA certifies that it is currently compliant with all fair housing and civil rights requirements and complied with all aspects of the 2006 amended Voluntary Compliance Agreement. The agency's compliance will not be negatively impacted by conversion activities.

HUD has developed an innovative, new path for Public Housing Authorities (PHAs) to leverage their existing public housing "Faircloth Authority" to create new federally assisted housing through the Rental Assistance Demonstration (RAD). "Faircloth-to-RAD" conversions will help PHAs, and their partners more readily access financing for the development of new deeply affordable units.

In a Faircloth-to-RAD transaction, PHAs will develop public housing units using HUD's public housing mixed-finance program with pre-approval to convert the property to a long-term Section 8 contract following acquisition or rehabilitation/construction. Regardless of any funding changes that may occur as a result of conversion under Faircloth to RAD, DCHA certifies that it will maintain its continued service level for the Public Housing and Housing Choice Voucher programs.

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

Name of Public Housing Development	PIC Development ID	Conversion Type (i.e. PBV or PBRA)	Transfer of Assistance
Barry Farm 108	Faircloth (units do not currently exist)	PBV	No
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
44	Senior	Senior	0 (Faircloth units do not currently exist and future CFP grant awards will not be affected)
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	n/a	20	20*
Two Bedroom	n/a	24	24*
Three Bedroom	n/a	0	0
Four Bedroom	n/a	0	0
Five Bedroom	n/a	0	0



*Units do not currently exist and are under construction. They will be added via Faircloth to RAD.

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 108. 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. 14 days in the case of nonpayment of rent; and
- iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. Grievance Process

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 applies to tenants receiving the EID at the time of conversion. No other tenant (e.g. tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion 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 108 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

Since this is a Faircloth to RAD transaction, there are no current residents. DCHA will give former Barry Farm residents preference for the newly constructed units as they come online.

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 Park Morton Phase 1

The District of Columbia Housing Authority (DCHA) was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the DCHA will be converting 40 public housing units at Park Morton Phase I to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-3 and any successor Notices. Upon conversion to Project Based Vouchers, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2012-32, REV-3; and Joint Housing PIH Notice H-2014-09/PIH-2014-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, DCHA certifies that it is currently compliant with all fair housing and civil rights requirements and complied with all aspects of the 2006 amended Voluntary Compliance Agreement. The agency's compliance will not be negatively impacted by conversion activities.

HUD has developed an innovative, new path for Public Housing Authorities (PHAs) to leverage their existing public housing "Faircloth Authority" to create new federally assisted housing through the Rental Assistance Demonstration (RAD). "Faircloth-to-RAD" conversions will help PHAs, and their partners more readily access financing for the development of new deeply affordable units.

In a Faircloth-to-RAD transaction, PHAs will develop public housing units using HUD's public housing mixed-finance program with pre-approval to convert the property to a long-term Section 8 contract following acquisition or rehabilitation/construction. Regardless of any funding changes that may occur as a result of conversion under RAD, DCHA certifies that it will maintain its continued service level for the Public Housing and Housing Choice Voucher programs.

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 I	Faircloth (units do not currently exist)	PBV	No
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
40	Family/Senior	Family/Senior	0 (Faircloth units do not currently exist and future CFP grant awards will not be affected)
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	n/a	13	13*
Two Bedroom	n/a	26	26*
Three Bedroom	n/a	0	0*
Four Bedroom	n/a	1	1*
Five Bedroom	n/a	0	0*



*Units do not currently exist and are under construction. They will be added via Faircloth to RAD.

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 I. 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. 14 days in the case of nonpayment of rent; and
- iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. Grievance Process

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:

- v. 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.
- vi. 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.
- vii. 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).
- viii. 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 applies to tenants receiving the EID at the time of conversion. No other tenant (e.g. tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion 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

- 7. 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.
- 8. Additional Monitoring Requirement.** DCHA's Board must approve the operating budget for the RAD property annually in accordance with HUD requirements.
- 9. 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.

- 10. 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.
- 11. 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.
- 12. 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 I 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

Since this is a Faircloth to RAD transaction, there are no current residents. DCHA will give former Park Morton residents and residents who are onsite during Park Morton Phases 1 and 2 preference for the newly constructed units as they come online.

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 Wheeler Creek

The District of Columbia Housing Authority (DCHA) was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the DCHA will be converting 101 public housing units at Wheeler Creek to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-3 and any successor Notices. Upon conversion to Project Based Vouchers, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2012-32, REV-3; and Joint Housing PIH Notice H-2014-09/PIH-2014-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, DCHA certifies that it is currently compliant with all fair housing and civil rights requirements and complied with all aspects of the 2006 amended Voluntary Compliance Agreement. The agency's compliance will not be negatively impacted by conversion activities.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing DCHA with access to private sources of capital to repair and preserve its affordable housing assets. The capital needs are informed by a Physical Conditions Assessment (PCA). A PCA was completed for Wheeler Creek and major improvements are required at the property and it is anticipated that additional debt or equity will be utilized to effectuate the conversion. Please be aware that upon conversion, DCHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that DCHA may also borrow funds to address their capital needs. The DCHA currently has debt under the Capital Fund Financing Program and will be working with 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 its continued service level for the Public Housing and Housing Choice Voucher programs.

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
Wheeler Creek	DC001003104	PBV	No
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
148	Family/Senior	Family/Senior	\$298,865.23 Due to the removal of 148 units from DCHA's CFP formula, this RAD transaction would impact DCHA's future CFP awards by this amount.
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	110	110	0



Two Bedroom	17	17	0
Three Bedroom	18	18	0
Four Bedroom	3	3	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 Kenilworth 166. 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. 14 days in the case of nonpayment of rent; and
- iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. Grievance Process

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 applies to tenants receiving the EID at the time of conversion. No other tenant (e.g. tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion 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 Wheeler 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

Relocation is not currently being contemplated. It has been proposed that renovation work will be done while residents are living within their units.

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.