



# FY 2023 MTW ANNUAL PLAN

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# Housing Authority City of Pittsburgh

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## Table of Contents

<b>I.</b>	<b>INTRODUCTION.....</b>	<b>5</b>
A.	Overview of the HACP’s Moving To Work Goals and Objectives.....	6
B.	Long-Term Goals and Objectives.....	7
C.	Short Term Goals.....	28
<b>II.</b>	<b>GENERAL HOUSING AUTHORITY OPERATING INFORMATION.....</b>	<b>29</b>
A.	Housing Stock Information.....	29
B.	Leasing Information.....	36
C.	Waiting List Information.....	38
<b>III.</b>	<b>PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED.....</b>	<b>39</b>
1.	Asset Exclusion & Self-Certification in HCV and Public Housing Programs.....	39
<b>IV.</b>	<b>APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED... </b>	<b>46</b>
A.	Implemented Activities.....	48
1.	Pre-Approval Inspection Certification.....	48
2.	Preferred Owners Program.....	50
3.	Modified Rent Policy with Work/FSS Requirement for Housing Choice Voucher Program.....	54
4.	Modified Rent Policy with Work/FSS Requirement for the Public Housing Program.....	58
5.	Revised Recertification Requirements Policy.....	63
6.	MTW Homeownership Program.....	65
a)	Operation of a Combined Public Housing and Housing Choice Voucher Homeownership Program.....	65
b)	Homeownership Assistance to include soft-second mortgage assistance coupled with closing cost assistance, homeownership and credit counseling; expand eligibility to persons on the LIPH and HCV program waiting lists and person eligible; and establish a Homeownership Soft-Second Mortgage waiting list.....	68

7. Modified Housing Choice Voucher Program policy on maximum percent of Adjusted Monthly Income permitted.....	70
8. Modified Payment Standard Approval.....	72
9. Step Up to Market Financing Program - Use of Block Grant Funding Authority for Development, Redevelopment, and Modernization.....	78
10. Local Payment Standard-Housing Choice Voucher Program.....	85
B. Not Yet Implemented Activities.....	89
C. Activities On Hold.....	89
D. Closed-Out Activities.....	89
E. Other Activities.....	90
1. Use of Block Grant Funding Authority to Support MTW Initiatives - Use of Block Grant Funding Authority to support Development and Redevelopment, Enhanced and Expanded Family Self-sufficiency and related programming, and the HACP MTW Homeownership Program.....	90
2. Energy Performance Contracting.....	91
3. Establishment of a Local Asset Management Program.....	91
4. Acquisition of Property and Build-Out to be Utilized for Administrative Offices.....	91
<b>V. PLANNED APPLICATION OF MTW FUNDS.....</b>	<b>92</b>
A. Planned Application of MTW Funds.....	92
B. Planned Application of PHA Unspent Operating Fund and HCV Funding.....	95
C. Local Asset Management Plan.....	96
D. Rental Assistance Demonstration (RAD) Participation.....	96
<b>VI. ADMINISTRATIVE.....</b>	<b>97</b>
A. Board Resolution and Certifications of Compliance.....	97
B. Documentation of Public Process.....	103
C. Planned and Ongoing Evaluations.....	103
D. Lobbying Disclosures.....	103
<b>VII. APPENDICES.....</b>	<b>108</b>
Appendix I. Local Asset Management Plan (LAMP).....	108
Appendix II. Units Approved for Homeownership.....	110
Appendix III. Revised HACP MTW Homeownership Plan.....	114
Appendix IV. MTW Activities Hardship Criteria.....	137



## I. INTRODUCTION

During Fiscal Year (FY) 2023, the Housing Authority of the City of Pittsburgh (HACP) is still committed to building better communities and improving the lives of the families who reside in the HACP housing communities. Throughout FY 2022, the HACP strove to provide its 20,000+ customers with high quality, safe housing; while working to provide additional housing opportunities to the thousands of Pittsburgh families currently waiting to find suitable, affordable housing accommodations. Affordable housing opportunities in the City of Pittsburgh are the standard versus the exception.

As evidenced by the Mission Statement, the HACP in FY 2023 will continue the quest to bring a higher quality of life to City of Pittsburgh residents by creating safe, affordable housing in conjunction with comprehensive support services, attentive property management and forward thinking real estate development strategies. The HACP has demonstrated a continued, firm commitment to expanding our affordable housing portfolio to help meet the City of Pittsburgh's growing demand. This goal will be accomplished by developing hundreds of new units in locations throughout the city – including mixed-finance, gap financing, project based voucher subsidies, and conventional development methods.

As Pittsburgh's renaissance continues, the HACP is taking measures to ensure that Pittsburgh's most vulnerable residents – our senior citizens, our disabled individuals and our low-income working families also are able to enjoy the benefits of our city's renaissance. Unprecedented circumstances, including a pandemic, reinforce the foundational principles that it is essential to rebuild an adequate supply of affordable housing, and why the HACP is committed to creating a variety of new affordable housing opportunities.

During the last decade, the HACP saw a torrent of development activity all across the city, including everything from routine repairs to the revitalization of entire communities. In every initiative, the HACP centered residents' needs and forged critical partnerships to herald a new era of affordable housing development in the City of Pittsburgh. We worked collaboratively to reinvest in communities, reinvest in people, and put whole neighborhoods on the path to launch.

In addition to our efforts to develop safe, affordable housing, the HACP is also poised to move forward with efforts to assist the 20,000+ Pittsburgh residents who currently reside in an HACP home or receive support through our Housing Choice Voucher (HCV) Program. The comprehensive, Family Self-Sufficiency (FSS) Program, the Resident Opportunity Self-Sufficiency (ROSS) Program, and other HACP resident initiatives are not limited to the Low-Income Public Housing (LIPH) Program. The resident initiatives, programs, and services through FSS are for both the LIPH and HCV residents and include, but are not limited to case management, linkages to services, employment, education, and training.

We provide our residents with the tools they need to become upwardly mobile and attain a higher quality of life. Through training and employment opportunities, any HACP resident who is committed to achieving self-sufficiency will be served. Through the ROSS and FSS Programs, the HACP training programs are designed to produce quality, sustainable employment opportunities.

The HACP is changing the face of affordable housing in all of our communities. Most important, we are helping to change the lives of the residents who call these communities “their home.”

## A. Overview of the HACP’s Moving to Work Goals and Objectives

The Housing Authority of the City of Pittsburgh’s (HACP)’s overarching Moving To Work (MTW) Goals are as follows and will be discussed in further detail throughout this FY 2023 MTW Annual Plan:

1. To reposition the HACP’s housing stock to preserve and expand affordable housing options and stabilize neighborhoods. These efforts are designed to result in housing that is competitive in the local housing market, is cost-effective to operate, provides a positive environment for residents, and provides broader options of high-quality housing for low-income families.
2. To promote independence for residents via programs and policies that promote work and self-sufficiency for those who are able to work; and, promote independent living while aging in place for the elderly and disabled.
3. To increase housing choices for low-income families through initiatives designed to increase the quality and quantity of housing available to households utilizing tenant-based rental assistance and other available resources.

## B. Long-Term Goals and Objectives

The HACP's vision for its MTW Program is built around three (3) major themes that together will achieve the statutory objectives and requirements.

- *Theme one* is to reposition the HACP's housing stock to compete in the local market, stabilize neighborhoods, improve operational efficiencies, and expand housing choices for low-income families.
- *Theme two* is to promote self-sufficiency and independent living through a variety of enhanced services and policy adjustments. These programs and policies are designed to provide incentives to work for adult, able bodied, non-elderly heads of households and family members, and to promote social and academic achievement for children and youth. In addition to increasing economic self-sufficiency among assisted families, these programs and policies are expected to result in increased revenue for the HACP (increasing the cost effectiveness of federal expenditures) while increasing housing choices for families (with increased work and income they will have additional housing choices both within the HACP portfolio and within the larger housing market).
- *Theme three* is to increase housing choices for low-income families through initiatives designed to increase the quality and quantity of housing available to households utilizing rental assistance and other available resources.

## Long Term Goal/Theme One: Repositioning of HACP's Housing Stock

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Since the initial HACP MTW Annual Plan was submitted in FY 2001, a major component of the HACP's MTW strategy has been to reposition the HACP's housing stock through a) preservation of successful developments and b) revitalization of distressed developments through strategic investments that integrate public housing properties with their surrounding neighborhoods serving as a catalyst for the expansion of public and private investments in revitalizing neighborhoods. The HACP has also introduced market rate units into most of its traditional and non-traditional mixed-finance/mixed-income communities, such as Oak Hill, Garfield, Skyline Terrace, Larimer/East Liberty, and Allegheny Dwellings, to enhance their competitiveness and better integrate them into nearby neighborhoods.

Initiated prior to MTW, through three (3) HOPE VI redevelopment projects and continued through the MTW Program, the HACP has achieved great success. A by-product of these redevelopment efforts is a reduced number of traditional, public housing units. This has been balanced by the addition of new affordable units supported by tax credits, project-based housing choice vouchers, and new units rented at market rates. In some of the HACP's mixed finance/mixed-income developments, a portion of the market rate units are rented at levels affordable to some low-income (80% of AMI) households. Traditional HCVs also support low-income families and occupancy of units available in the private market. It should be noted, the HACP efforts have also reduced housing densities in communities, providing mixed-income housing and housing with modern conveniences.

The City of Pittsburgh experienced rapid growth in the technology and healthcare industries in recent years and this has resulted in high-end developers meeting the supply and demand of higher income residents moving into the region. Neighborhoods once abundant with affordable market rate rents experienced a surge in pricing for both new and existing units. Low-income families, including those utilizing HCVs, have increasing difficulty locating affordable homes in neighborhoods of opportunity and are increasingly priced-out of additional neighborhoods as the market continues to shift. There is a lack of affordable units in the City of Pittsburgh that disproportionately affects families at and below 30 percent (30%) of Area Median Income (AMI).

The HACP recognizes the affordable housing need and is working to address these concerns through a variety of strategies, including increasing landlord outreach and the development of a payment standard reflective of the increasing cost of housing. One (1) core strategy continues to be the creation of new, affordable units supported by tax credits and project-based vouchers, and acquisition. This approach has enabled the HACP to continue serving substantially the same number of families as would have been served, absent the MTW demonstration designation.



To foster increased affordability, the HACP will expand the range of homeownership opportunities for residents, participants, and low-income public housing (LIPH) eligible persons. The expanded options will include: (1) Section 32/Purchase and Resale Entities (PRE) – the HACP will partner with local agencies to establish a pilot program to provide new, affordable homeownership opportunities; (2) Scattered Sites – homeownership opportunities for the LIPH residents who occupy the units; (3) Bond Program – the HACP will partner with the Pittsburgh Urban and Redevelopment Authority (URA) to offer affordable housing to the “workforce” population at 80% AMI; and (4) Land Trust – the HACP will partner with the Pittsburgh Community Land Trust to create an affordable initiative.

The “Step Up To Market Financing Program” initiative was created in FY 2012 and was initially included in the amended, FY 2012 MTW Annual Plan. This HUD-approved MTW activity has evolved to include several, innovative strategies for re-positioning of the HACP housing stock.

The HACP has also invested in its redevelopment of distressed public housing communities, especially, family communities, since the late 1990s. The activities for the past ten (10) years include the mixed-finance/mixed income redevelopment of Addison Terrace, Hamilton-Larimer, Allegheny Dwellings, Glen Hazel, and Oak Hill – all of which were converted public housing platform to Project-Based Voucher (PBV) or Project-Based Rental Assistance (PBRA).

The HACP has also implemented an Energy Performance Contract for improvements that included but was not limited to the installation of energy efficient and cost saving geothermal heating (and cooling) systems at several developments. The HACP is committed to continuing these preservation and revitalization efforts to the greatest extent feasible with the funding available throughout the MTW demonstration. The HACP will track its energy, water, and electricity usage through the Environmental Protection Agency’s Energy Star Portfolio Manager for benchmarking purposes. The data will be used to augment pre-existing tools used to create future projections and pathways to accomplish the energy and water reduction goals of the City of Pittsburgh’s Climate Action Plan by 2030.

The HACP has also successfully implemented a MTW local non-traditional development program, the PBV/Gap Financing program, to support various private developers/owners in developing and preserving low-income affordable housing in various mixed-finance projects throughout the city since FY 2016.

The charts in this plan show projected sources of funds that can be used for capital projects, and projected uses of those funds over the next five (5) years. All of these numbers reflect projected obligations (not expenditure) of funds are subject to change based upon funding levels and opportunities, financial and real estate market conditions, new or changing regulations or requirements, or other unforeseen developments. The highlights of this plan relating to the repositioning of the HACP’s housing stock are as follows:

Development	FY 2023 Plans
<b>Larimer/East Liberty Phase III</b>	Phase III is part of the Larimer/East Liberty Choice Neighborhood Implementation Grant (CNIG) Program. Approximately 42 mixed-income rental units will be developed with 9% Low-Income Housing Tax Credits (LIHTC). This phase is under construction. Construction will be completed by Q1 2023. The mixed-use building of Phase III will include 4,800-square feet of commercial/retail space on the Larimer Avenue corridor.
<b>Larimer/East Liberty Phase IV</b>	Phase IV of the Larimer/East Liberty CNIG housing development consists of adaptive reuse and mixed-use of the historic Larimer School (35 units) and new construction of townhomes (7 units). This Phase consists of approximately 42 mixed-income rental units and has been financed with a 9% LIHTC which was awarded in July 2019. The project is under construction. Construction is anticipated to be completed in Q3 2022.
<b>Larimer/East Liberty Phase V Large-family Scattered Site Replacement units</b>	The HACP's intergovernmental contractor, Urban Redevelopment Authority (URA) of Pittsburgh will use a conventional public housing development method to develop two (2) 3- bedroom units and one (1) 5- bedroom replacement public housing units in the Larimer neighborhood under the CNIG program. The URA is completing pre-development activities. The project has been delayed mainly due to the city's quiet title process, construction cost increases and contractor/labor shortages caused by the current pandemic. Construction is projected to begin in Q3 of 2022.
<b>Bedford Dwellings Redevelopment</b>	The HACP and instrumentality, Allies & Ross Management and Development Corporation (ARMDC), will continue to explore and work with public and private partners to identify the best opportunities for the redevelopment of Bedford Dwellings in the Hill District. The development opportunities will include the construction of the first phase of replacement housing for Bedford Dwellings (see more information below), pursuit of a CNIG application in 2022, and PBV/Gap Financed developments conducted in partnership with the City of Pittsburgh, Bedford Dwellings residents, the URA, and qualified developers to continue the Choice Neighborhoods Transformation objectives in the Hill District.
<b>Bedford Dwellings Phase I</b>	The ARMDC has applied for 4% and 9% LIHTC awards simultaneously for Phase 1 of Bedford Dwellings Redevelopment. This phase will consist of 123 rental housing units (including 90 PBV units) to generate replacement units in an offsite location known as Miller-Reed-Roberts for the Somers Drive section of Bedford Dwellings in the Hill District. Financial closing is projected to be in Q2 2023.

<b>Northview Heights Midrise</b>	The HACP plans to develop a new mid-rise senior housing building with up to forty-three (43) units of public housing along with approximately 4,800 square feet of commercial space on the first floor. The Northview Midrise will replace the deteriorating Northview High-rise senior apartment building by being constructed on a 3.96 acre tract of vacant land in Northview Heights that will be disposed of for that purpose. The HACP and the ARMDC submitted a four percent (4%) LIHTC application in spring of 2021. It is anticipated that financial closing, land disposition and construction will begin in 2022 or early 2023. The HACP will pursue the acquisition, re-development, or construction of housing on alternative off-site real estate throughout the City of Pittsburgh for the development of additional replacement units. The HACP also plans to demolish the existing Northview High-rise building along with the ancillary gymnasium / recreational space upon completion of the Northview Midrise. High-rise residents will be relocated to other affordable housing options in accordance with the HACP's relocation plan. The HACP plans to develop a new multi-purpose community building as a replacement facility for the demolished gymnasium.
<b>Scattered Site Improvement Planning and Implementation</b>	The HACP will continue to review various asset management, housing acquisition, and rehabilitation options to improve the quality and quantity of housing stock and preserve long-term affordability of scattered site units. The HACP will utilize internal resources through the Development and Modernization Department in coordination with other developers/contractors, as necessary.
<b>Manchester Redevelopment (RAD)</b>	The HACP through the ARMDC will continue preserving affordability in Manchester through redevelopment, an early HOPE VI mixed-finance redevelopment acquired by the HACP in 2017. The 86 affordable rental units will be transformed with HUD's Rental Assistance Demonstration (RAD) and project-based voucher program. The HACP received HUD's approval for the RAD application (Commitment for Housing Assistance Payment or CHAP) in May 2020 and subsequently submitted a LIHTC application in early 2021. The anticipated financial closing, land disposition and construction will begin in 2022 or early 2023.
<b>Turnkey Development of Scattered Sites</b>	Amani Christian Community Development Corporation (ACCDC) is developing twenty-two (22) scattered site units in the Middle Hill District and is in the pre-development stage. The HACP will provide ongoing support as ACCDC seeks final approval from the City of Pittsburgh for permitting and other requirements and plans to acquire the units when they complete construction in late 2024.

<b>St. Clair and Vacant Lots</b>	<p>The HACP submitted the disposition application for the former St. Clair Village property to HUD’s Special Application Center (SAC) on January 28, 2022. The URA is intent on purchasing certain tracts of the property for urban agricultural uses and steep hill conservation purposes at a fair market value. The SAC is currently reviewing the submitted disposition application.</p>
<b>Disposition, Acquisition and Redevelopment of Properties</b>	<p>The HACP will acquire property for the purposes of redevelopment and dispose of agency owned parcels that are not intended for development or other special purpose uses. In addition, the HACP will pursue the redevelopment of agency-owned property. Mixed-finance development of various public housing properties as well as other self-development opportunities are in the planning or pre-development phases; including single family and other self-development activities.</p> <ul style="list-style-type: none"> <li>• The HACP-owned vacant land along Bedford Avenue including property commonly called “Francis Street” is planned for the Bedford Dwellings redevelopment through the ARMDC.</li> <li>• The HACP plans to submit disposition applications for two (2) vacant scattered site properties: 700 Lillian Street and 802 Stanhope Street.</li> <li>• The HACP plans to implement a surplus property sales program designed to sell vacant lots and or structures that are obsolete and/or not required as part of development or modernization initiatives in accordance with 24 CFR 970.3(b)(2). The intended outcome is to relieve the HACP of the expense of maintaining the vacant lots.</li> </ul> <p>The HACP is also seeking new opportunities for affordable housing with non-traditional, innovative approaches including acquisition/preservation of naturally occurring affordable-housing, acquisition/rehabilitation, acquisition/new construction, and historic rehab throughout the city. The HACP is working with the community and real estate professionals to identify properties for sale that meet the HACP’s housing goals and provide additional quality housing options for residents. The HACP or ARMDC will own the properties with public housing or PBV operating subsidies.</p> <p>The properties currently intended for inclusion in the surplus property disposition program are as follows:</p>



	Property Address	Parcel ID	Type	Acres
	190 Webster Ave, 15219	0-J-6	Land	0.0321
	Webster Ave, 15219	10-J-7	Land	0.0271
	Webster Ave, 15219	10-J-7-A	Land	0.0228
	802 Stanhope St, 15204	42-E-280	Structure	0.5664
	Trent St, 15219	10-J-82	Land	0.0278
	7 Trent St, 15219	10-N-13	Land	0.0278
	9 Trent St, 15219	10-N-14	Land	0.0278
	11 Trent St, 15219	10-N-15	Land	0.0268
	Webster Ave, 15219	10-N-97	Land	0.0306
	Devilliers St, 15219	11-A-290	Land	0.1837
	Allequippa St, 15213	11-G-153	Land	0.1047
	Thorn St, 15208	174-H-374	Land	0.1232
	1811 Cliff St, 15219	9-M-127	Land	0.0204
	1858 Cliff St, 15219	9-M-180	Land	0.0630
	25 Monaca Pl, 15219	9-M-195-A	Land	0.0421
	1830 Cliff St, 15219	9-M-195-B	Land	0.0267
	0 Monaca Pl, 15219	9-M-202	Land	0.0301
	0 Monaca Pl, 15219	9-M-203	Land	0.0331
	0 Monaca Pl, 15219	9-M-204	Land	0.0152
	2 Monaca Pl, 15219	9-M-206	Land	0.0152
	Monaca Pl, 15219	9-M-207	Land	0.0165
	Bedford Ave, 15219	9-M-258	Land	0.0154
	58 Monaca Pl, 15219	9-M-277	Land	0.0220
	1911 Webster Ave, 15219	9-M-334	Land	0.0612
	1819 Enoch St, 15219	9-S-231	Land	0.0129
	1815 Enoch St, 15219	9-S-231-A	Land	0.0129
	1817 Enoch St, 15219	9-S-231-B	Land	0.0124
	1844 Bedford Ave, 15219	9-S-66	Land	0.1458
	700 Lillian St, 15210	14-J-131	Structure	0.0602
<b>City's Edge Residential Development</b>	City's Edge, located in the Uptown neighborhood of the city, is a new construction, mixed-use, and mixed-income six (6)-story elevator building. It will comprise of one hundred-ten (110) units, made up of ninety-two (92) PBV units and eighteen (18) market-rate units. This project is workforce targeted. The commercial component of the property may include a parking garage, a MBE/WBE incubation space, medical care facility, and a business center. This project will consist of 9% and 4% LIHTCs. This project is awaiting tax credit awards in Q3 of 2022 and construction is anticipated to begin in Q1 2023.			

<b>Acquisition and Build-Out of New Administrative Space and Disposition of HACP Office</b>	The HACP purchased office space located at 412 Boulevard of the Allies (f.k.a. 420 Boulevard of the Allies) on September 20, 2018. The new space is being renovated to house the administration of the HACP and will accommodate adequate public reception, meeting, and interaction space. The HACP will also dispose of its current administrative space located in the John P. Robin Civic Building, 200 Ross Street, Pittsburgh, which is expected to take place in FY 2023.
<b>Oak Hill RAD</b>	A nine percent (9%) tax credit application will be submitted to the Pennsylvania Housing Finance Agency (PHFA) in FY 2023 for the redevelopment of Oak Hill Major Reconstruction of Obsolete Properties (MROP) units, which have been vacant for several years. Based on the resulting award, a closing for this phase can take place in 2023 or 2024. HUD has approved a Converted Awaiting Transfer request for early demolition of the units in the meantime. Demolition of MROP units will occur in 2023 or 2024. The HACP will also seek HUD approval in 2023 for the disposition of certain parcels in the neighborhood to be managed by the owner entities of the Oak Hill mixed-income community.
<b>2017 PBV/Gap Financing RFP</b>	The Lemington Senior Development completed construction in November 2021 and is currently in the lease-up process. The project consists of fifty-four (54) units with 100% supported by PBVs. Gap Financing was provided in the amount of \$3,984,900.
<b>2018 PBV/Gap Financing RFP (MTW Local Non- Traditional activity)</b>	<ol style="list-style-type: none"> <li>1. <b><u>North Negley Residences:</u></b> Under construction. This project's financial closing occurred on April 30, 2021, and is estimated to reach completion in December 2022. Lease-up activities will begin in Q3 of 2022. The development consists of 45 rental units including 13 PBV units. Gap Financing was provided in the amount of \$875,000.</li> <li>2. <b><u>New Granada Square Apartments:</u></b> Under construction. The project consists of 40 rental units including 10 PBV units. The project's financial closing occurred on June 4, 2021. This project is currently under construction and completion is anticipated by December 30, 2022. Lease-up activities will begin in Q3 2022. Gap Financing was provided in the amount of \$1,000,000.</li> </ol>
<b>2019 PBV/Gap Financing RFP (MTW Local Non- Traditional activity)</b>	<ol style="list-style-type: none"> <li>1. <b><u>Gladstone Residences (The Community Builders, Inc.):</u></b> <ol style="list-style-type: none"> <li>a. 20 PBV units, 33 non-PBV units,</li> <li>b. Pre-development activities are currently ongoing.</li> <li>c. Gap Financing is provided in the amount of \$1,000,000.</li> </ol> </li> <li>2. <b><u>Harvard Beatty Street Housing (TREK Development Group, Inc.):</u></b> <ol style="list-style-type: none"> <li>a. 8 PBV units, 14 non-PBV units,</li> <li>b. No Gap Financing is provided for this project.</li> <li>c. Project is currently under construction. Project completion is anticipated by the end of 2022.</li> </ol> </li> </ol>

	<p><b>3. <u>Fifth and Dinwiddie Redevelopment (Bridging the Gap Development, Inc.):</u></b></p> <ul style="list-style-type: none"> <li>a. 35 PBV units, 136 non-PBV units,</li> <li>b. Pre-development activities are ongoing.</li> <li>c. Gap Financing is provided in the amount of \$3,150,000</li> </ul> <p><b>4. <u>Highland-Stanton Apartments (Action Housing, Inc.):</u></b></p> <ul style="list-style-type: none"> <li>a. 23 PBV units,</li> <li>b. No additional units,</li> <li>c. Pre-development activities are gradually subsiding. The project's development proposal will be sent to HUD by the end of FY 2021.</li> <li>d. Project is cost overburdened due to the volatile nature of the construction market. The HACP is considering increasing the project's gap financing in order to enable the project to close. Gap Financing was provided in the amount of \$2,070,000, previously \$1,800,000.</li> </ul>
<b>2020 PBV/Gap Financing RFP (MTW Local Non- Traditional activity)</b>	<p><b>1. <u>Cedarwood Homes (Tryko Partners):</u></b></p> <ul style="list-style-type: none"> <li>a. 24 PBV units, 22 non-PBV units,</li> <li>b. The developer was awarded 9% tax credits.</li> <li>c. Gap Financing is provided in the amount of \$2,160,000.</li> <li>d. Pre-development activities are ongoing. Financial closing is projected to occur in December 2022.</li> </ul>
<b>2021 PBV/Gap Financing RFP (MTW Local Non- Traditional activity)</b>	<p><b>1. <u>Letsche School (Beacon Communities):</u></b></p> <ul style="list-style-type: none"> <li>a. 25 PBV units, 21 non-PBV units,</li> <li>b. The developer was awarded 9% tax credits.</li> <li>c. Gap Financing is provided in the amount of \$2,250,000.</li> </ul> <p><b>2. <u>Oakland Pride Housing (Affirmative Investments &amp; Presbyterian SeniorCare Network):</u></b></p> <ul style="list-style-type: none"> <li>a. 30 PBV units, 21 non-PBV units,</li> <li>b. The developer has applied for 4% tax credits.</li> <li>c. Gap Financing is provided in the amount of \$2,700,000.</li> </ul> <p><b>3. <u>N. Homewood Avenue (McCormack Baron Salazar):</u></b></p> <ul style="list-style-type: none"> <li>a. 15 PBV units, 45 non-PBV units,</li> <li>b. The developer has applied for 9% tax credits.</li> <li>c. Gap Financing is provided in the amount of \$1,350,000.</li> </ul> <p><b>4. <u>4800 Block of Second Avenue (The Community Builders):</u></b></p> <ul style="list-style-type: none"> <li>a. 24 PBV units, 20 non-PBV units,</li> <li>b. The developer has applied for 9% tax credits.</li> <li>c. Gap Financing is provided in the amount of \$1,920,000.</li> </ul> <p><b>5. <u>Hazelwood Green (Tishman Speyer HG Developer, LLC):</u></b></p> <ul style="list-style-type: none"> <li>a. 54 PBV units, 51 non-PBV units,</li> <li>b. The developer has applied for 4% and 9% tax credits.</li> <li>c. Gap Financing is provided in the amount of \$4,860,000.</li> </ul>

	<p><b>6. <u>2159 Centre Avenue (Amani Christian Community Development Corporation):</u></b></p> <ul style="list-style-type: none"> <li>a. 12 PBV units,</li> <li>b. This project does not include tax credits.</li> <li>c. Gap Financing is provided in the amount of \$1,000,000.</li> </ul> <p><b>7. <u>Legacy Village (Bridging the Gap Development, LLC):</u></b></p> <ul style="list-style-type: none"> <li>a. 11 PBV units, 24 non-PBV units,</li> <li>b. The developer has applied for 9% tax credits.</li> <li>c. Gap Financing is provided in the amount of \$990,000.</li> </ul>
<b>Choice Neighborhoods Planning Grant</b>	Fineview Citizens Council (Lead-grantee) and the HACP (Co-grantee) were awarded HUD's FY2020 Choice Neighborhoods Planning Grant for Allegheny Dwellings public housing and its surrounding neighborhood in Northside in December 2020. The HACP will submit the final transformation plan to HUD by the end of FY 2022. HUD-approved Allegheny Dwellings Early Action Activities are currently in the design development phase. These Early Action Activities must be implemented before the end of FY 2022.
<b>New Pennley Place Phase I RAD</b>	The owner of a twenty (20)-year old mixed-finance rental housing community, New Pennley Place Phase I, has been awarded a Commitment to Enter into a Housing Assistance Payments Contract, (CHAP) in March 2022 for its RAD to PBV conversion of 38 public housing units (20 1-bedroom units, 16 2-bedroom units, 2 3-bedroom units) in East Liberty neighborhood. This area is the center of a tremendous amount of private, market-rate housing investors and developers. Further description of this proposal is described in the Pursuit of RAD Conversion section below. The HACP will continue to work with the owner and residents of Phase I to structure the RAD conversion in FY 2022 and 2023.
<b>Single Family Homes Pilot and Partnership Programs</b>	The HACP will create new affordable homeownership opportunities through the development of single-family homes for sale through a pilot program under Section 32. The for-sale affordable homeownership program is intended to address infill housing through rehabilitation. The initial goal is to construct 1-5 single-family homes in partnership with other organizations that qualify as Purchase and Resale Entities (PREs) that provide services, support, and financing to ensure the best possible opportunity for success of the low-income homeowner.
<b>Veterans Affairs Supporting Housing (VASH) PBV / Tiny Homes</b>	The HACP is planning a new development opportunity to build approximately eight (8) one (1) bedroom tiny homes. The development will utilize VASH PBVs to provide affordable housing opportunities to low-income veterans.



## **Pursuit of Rental Assistance Demonstration (RAD) Conversions**

To continue to ensure the long-term viability of its existing affordable housing stock, the HACP is pursuing the conversion of some public housing units to HUD Housing Assistance Payment (HAP) contracts for multi-family housing rental assistance through the Rental Assistance Demonstration (RAD) Program. The HACP received approval for the following properties:

- Glen Hazel Family Community and Glen Hazel High Rise (Conversion in 2018)
- Oak Hill (Conversion in 2017)
- Manchester Redevelopment (Obtained HUD's Commitment to enter into a Housing Assistance Payment or CHAP in March 2020)
- New Pennley Place Phase I (Obtained HUD's CHAP in March 2022)

The RAD financial closing occurred for Glen Hazel Family Community and Glen Hazel High Rise in 2018. Rehabilitation and relocation activities of Glen Hazel RAD were completed in FY 2020. Oak Hill Phase I and Phase II-Wadsworth sub phase were converted to HUD Project-based Rental Assistance (PBRA) through the RAD Program in FY 2017. Major Reconstruction of Obsolete Public Housing Projects (MROP) public housing buildings (originally built in 1941) in Oak Hill Phase I have been approved for demolition and replacement of the eighty (80) MROP public housing units. Oak Hill's master developer will continue its efforts of securing development funds to complete the replacement of the MROP units. Manchester Redevelopment has been approved by HUD via its CHAP in order to convert the eighty-six (86) unit public housing portfolio into the PBV platform with housing rehabilitation. New Pennley Place Phase I has been approved by HUD via its CHAP in order to convert thirty-eight (38) public housing units into PBVs with housing rehabilitation. The HACP will continue to negotiate with the owner entity of New Pennley Place through FY 2023 to restructure the HACP's existing debt facility and the multi-faceted, refinancing/rehabilitation deal to support the preservation of long-term affordable housing.

The HACP considers the RAD a viable option for increasing housing opportunities through new construction, conversion, or transfer of assistance to developments through partnership or self-development activities. Various means to secure the affordability of RAD units include cooperative memoranda, agreements or restrictive covenants and will be explored.

## Long Term Development and Redevelopment Funding Projections

In this section are charts showing projected, funding obligations over the next five (5) years. Not included in the charts are funding and financing strategies, including those that use MTW funding flexibility, support, and leverage MTW funds to support redevelopment of these properties. As funding opportunities and financing mechanisms change, and creative approaches are devised, the HACP will adapt and adopt the approaches that are most advantageous to the agency. These approaches include but are not limited to the following:

- Federal Infrastructure Funding.
- Low-income Housing Tax Credits, Historic Tax Credits, and/or New Market Tax Credits.
- Federal, State, and Local Housing Trust Funds dollars as available.
- Other Federal, State, and Local funds such as CDBG, HOME, PA Department of Community and Economic Development Programs, and others as they become available.
- HUD's new and evolving financing and transformation initiatives (if authorized), or other similar approaches.
- Project-Based Voucher: Project-basing Housing Choice Vouchers (PBVs).
- Project Based Rental Assistance (HUD Multifamily).
- The HACP's Moving to Work *Step Up To Market Financing Program*.
- Gap Financing program, an MTW local non-traditional development source approved by HUD.
- Choice Neighborhoods Planning and Implementation Grant Funds.
- Local Blended Subsidy with MTW block grant operating subsidy.
- Public Housing Authority Mortgaged Transactions (PMT) under section 30 of the United States Housing Act of 1937.
- All other opportunities and mechanisms that are available or can be identified that will assist the HACP in furthering its goals under MTW and under the LIPH and HCV programs.

## Local Blended Subsidy

The MTW Local Blended Subsidy (LBS) program will allow the HACP to blend its MTW block grant and public housing operating funds to subsidize units reserved for low-income households. This is utilized to create an operating expense level, which is adequate to provide essential operating services while also supporting debt service required to finance a new mixed-finance replacement housing development. In essence, the HACP intends to utilize the LBS program to provide affordable housing options to residents while maximizing the leverage of third-party sources as a way to pay for development and long-term operating costs. The LBS program is targeted toward developments where the units require a subsidy level that is not otherwise available through the traditional public housing subsidy program. The units that utilize HUD's LBS program will continue to be subject to the rules and regulations under Section 9 of the Housing Act of 1937 and will be subject to a Subsidy Layering Review or other appropriate analysis by HUD.

- i. The LBS program will be available for the Northview Midrise and other mixed-finance subsequent development projects approved by HUD.
- ii. All financing partners involved with the Northview Midrise development will be made aware of the utilization of the LBS program to pay for a certain amount of loan facilities.
- iii. The HACP will continue to be subject to the Mixed-Finance Development standard protocols and procedures outlined in 24 CFR 905, Subpart F, and anticipates that any debt structure would be subject to the HUD reviews as HUD deems appropriate.

## Public/Private Partnership Investments in Housing

The HACP will also continue to create opportunities for development through public and private sector investments. These investments will be leveraged to develop affordable multifamily and for sale units. The HACP will explore and plans to conduct development activities that leverage resources in preparation for housing that may serve as Choice replacement housing and/or supports other affordable housing initiatives.

Projected Sources	2023	2024	2025	2026	2027	5-Year SubTotals
MtW Funding (HCV)	9,770,191	9,770,191	9,770,191	9,770,191	9,770,191	48,850,955
CFP Projected Future Funding	11,257,021	11,000,000	11,000,000	11,000,000	11,000,000	55,257,021
MtW Reserves	5,896,518	7,589,963	13,564,551	5,115,650	13,011,358	45,178,040
<b>Total All Projected Sources</b>	<b>26,923,730</b>	<b>28,360,154</b>	<b>34,334,742</b>	<b>25,885,841</b>	<b>33,781,549</b>	<b>149,286,016</b>

Proposed Uses	2023	2024	2025	2026	2027	5-Year SubTotals
Subtotal Development	15,000,000	18,000,000	27,000,000	17,000,000	28,000,000	105,000,000
Subtotal Modernization	11,923,730	10,360,154	7,334,742	8,885,841	5,781,549	44,286,016
<b>Total All Proposed Uses</b>	<b>26,923,730</b>	<b>28,360,154</b>	<b>34,334,742</b>	<b>25,885,841</b>	<b>33,781,549</b>	<b>149,286,016</b>

Development Project	2023	2024	2025	2026	2027	5 Year Total
Turnkey Public Housing	2,000,000	0	0	0	0	2,000,000
Bedford Redevelopment Phase 1	3,000,000	0	0	0	0	3,000,000
Bedford Redevelopment Phase 2	2,000,000	8,000,000	0	0	0	10,000,000
Bedford Redevelopment Phase 3	0	2,000,000	8,000,000	0	0	10,000,000
Bedford Redevelopment Phase 4	0	0	2,000,000	8,000,000	0	10,000,000
Bedford Redevelopment Phase 5	0	0	0	2,000,000	9,000,000	11,000,000
Bedford Redevelopment Phase 6	0	0	0	0	2,000,000	2,000,000
PBV/Gap Financing Program	7,000,000	7,000,000	7,000,000	7,000,000	7,000,000	35,000,000
Allegheny Dwellings Redevelopment	1,000,000	0	10,000,000	0	10,000,000	21,000,000
Infill For-Sale Rehab Demonstration	0	1,000,000	0	0	0	1,000,000
<b>Total</b>	<b>15,000,000</b>	<b>18,000,000</b>	<b>27,000,000</b>	<b>17,000,000</b>	<b>28,000,000</b>	<b>105,000,000</b>



AMP: 1  
Addison Terrace / Additions  
(201 KIRKPATRICK ST CENTRAL  
MAINTENANCE)

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	222,525.14	98,518.28	85,770.75	15,706.08	14,208.00	436,728.25

AMP: 2  
Bedford Dwellings

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	6,274,193.36	2,906,269.99	4,397,973.43	3,476,332.99	1,886,324.90	18,941,094.67

AMP: 15  
Pennsylvania Bidwell

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	1,424,009.20	745,514.50	1,622,069.75	285,511.00	781,606.94	4,858,711.39

AMP: 17  
Pressley St High Rise

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	1,377,600.34	577,523.74	482,536.46	4,213,071.99	352,015.58	7,002,748.11

AMP: 5  
Allegheny Dwellings

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	1,966,187.30	2,032,821.94	1,424,666.65	913,077.38	822,474.32	7,159,227.59

AMP: 9  
Northview Heights (Family / Elderly)

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	4,035,259.86	3,644,699.54	3,190,923.49	7,215,852.87	6,680,925.04	24,767,660.80

AMP: 20  
Homewood North

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	2,336,150.21	874,425.54	815,106.17	896,412.10	752,706.06	5,674,800.08

AMP: 4  
Arlington Heights

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	2,592,529.81	4,892,625.23	1,128,533.29	1,313,092.83	893,012.00	10,819,793.16

22/39  
Scattered Sites North/South  
AMP: [Includes D.O.C. 1205 Liverpool St  
(Direct Opportunities Center) & former  
AMP-11 Hamilton Larimer

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	2,787,061.00	2,143,047.37	1,575,011.11	1,970,432.23	1,743,636.23	10,219,187.94

AMP: 31  
Murray Towers

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	404,773.54	117,456.48	601,610.77	777,881.14	274,183.20	2,175,905.13

AMP: 40  
Mazza Pavillion

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	218,302.50	77,396.26	17,437.90	130,471.94	228,147.96	671,756.56

AMP: 41  
Caliguiri Plaza

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	48,747.66	329,315.43	1,047,680.04	16,468.00	334,190.10	1,776,401.23

AMP: 44  
Finello Pavillion

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	557,909.61	469,912.00	453,575.83	461,253.08	113,363.81	2,056,014.33

AMP: 45  
Morse Gardens

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	448,768.21	1,117,967.15	424,032.80	546,345.34	131,848.20	2,668,961.70

AMP: 46  
Carrick Regency

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	510,315.75	473,301.64	966,736.37	174,464.02	66,876.79	2,191,694.57

AMP: 47  
Gualtieri Manor

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	319,681.61	189,545.87	323,063.07	330,092.43	239,413.00	1,401,795.98

AMP: 999  
Authority Wide

Work Items	2023 Projected Obligations	2024 Projected Obligations	2025 Projected Obligations	2026 Projected Obligations	2027 Projected Obligations	5-Year Budget Total
Totals	3,850,000.00	2,290,000.00	2,498,100.00	2,310,000.00	2,310,000.00	13,258,100.00

GRAND TOTAL All AMPs	29,374,015.10	22,980,340.96	21,054,827.88	25,046,465.42	17,624,932.13	116,080,581.49
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## Unit Acquisition

In 2022, the HACP committed three (3) million dollars to the acquisition of single family and multi-unit parcels in order to increase the number of affordable housing units within the City of Pittsburgh. As funding is available, the HACP intends to continue this activity in 2023.

## Long Term Goal/Theme Two: Promoting Self-Sufficiency and Independent Living Through a Variety of Enhanced Services and Policy Adjustments

The HACP is committed to continuing the pursuit of programs and policies that promote self-sufficiency and independent living. This is pursued and implemented through program and policy modifications.

The HACP has several supportive service programs that support residents in attaining actualized Self-Sufficiency. The programs include, but are not limited to the Family Self-Sufficiency Program (FSS), the Resident Employment Program (REP), the Resident Opportunity for Self-Sufficiency (ROSS), and Computer Programs. These programs and referrals for residents of the LIPH and the HCV programs are designed to assist them in preparing for, seeking, finding, and retaining employment as well as financial literacy and reentry. The program components and the HACP FSS and RSS Staff also work constantly to link residents with other programs, leverage additional services, and create positive environments for families, adults, seniors, and children. The FSS, ROSS, REP and the Computer Programs are complemented by the other resident initiatives provided by the HACP and its partners that focus on youth and adults of varying ages. These other initiatives include summer programming, programs addressing food insecurity, literacy and training programs, the Clean Slate Drug Free Lifestyles, and the Creative Arts Corner which is a state-of-the-art audio/video studio at Northview Heights and the Bedford Hope Center. The HACP's investments in resident services have leveraged over \$4,000,000 per year in additional programs and services in recent years. The Service Coordinators are retained through the HUD-funded FSS and ROSS Program Grants. There are also many other ancillary service providers that offer in-kind services to the HACP residents. Some of these providers include but are not limited to:

84 Lumber	Community Empowerment Association (CEA)	Jeremiah's Place	Pittsburgh Community Services, Inc. (PCSI)
412 Food Rescue	Councilman Bobby Wilson	Jerome Bettis Bus Stops Here Foundation	Pittsburgh Financial Empowerment Center (FEC)
A Philip Randolph Institute	Creating Arts Corner Partners	Josh Gibson Foundation	Pittsburgh Fire Department
ABK Learning Center	Davis Consulting Solutions (DCS)	League of Women Voters of Greater Pittsburgh	Pittsburgh Job Corp
Allegheny County Department of Aging	Diversified Health	Life Span	Pittsburgh Bureau of Police
American Red Cross	Dollar Bank	Light House Cathedral	Pittsburgh Public Schools
Arlington Heights Tenant Council	Dress for Success	Macedonia Family and Community Enrichment Center, Inc. (FACE)	PNC Bank
Bethany House Ministries	Driver's Education	McAuley Ministries Foundation	Project Density

BJWL Out of School Program (Homewood)	Duquesne University School of Pharmacy and School of Education	Mercy Acts International	One North Side
Brashear Association	Energy Innovation Center	Michael Blackwell North Side Outreach	Reading Is Fundamental
Builders Guild of Western PA	FamilyLinks	Minority Emergency Preparedness Task Force	Rivers Casino
Carnegie Library of Pittsburgh	Foundation of Hope	Mission Vision	RK Mellon Foundation
Cash for Kids	Garfield Jubilee	Mistick Construction	Stem Coding Lab
Center for Victims	Gateway Health Plan	New Dawn Beginnings	University of Pittsburgh
CitiParks Feeding Program	Gateway Robert Wood Foundation	Northview Heights Citizens Council, Inc.	UPMC Living at Home
City of Pittsburgh City Council	Global Links	Northview Heights High Rise Tenant Council	Urban League of Greater Pittsburgh
City of Pittsburgh Healthy and Active Living Program	Goodwill of Southwestern Pennsylvania	Northview Heights Police Substation	Urban League Family Support Center
Clean Slate E3 Scholarship Program	Greater Pittsburgh Food Bank	North Side Christian Health Center	Ursuline Eviction Prevention Program
Comcast	HACP Mask Monday	Peace Makers	Ursuline Support Services
Community College of Allegheny County	Heinz Endowments	Pittsburgh City Planning Department	YouthPlaces

The HACP policy modifications are also designed to promote self-sufficiency, and the modified rent policy (as described in Section IV), is designed to encourage families to participate in the FSS program. The broad intent of these initiatives is to create an environment where work is the norm and personal responsibility is expected. The HACP will continue in FY 2023 to pursue additional policy adjustments toward this end. Such policy changes may include increasing the minimum rent for those able-bodied non-elderly residents who do not work or participate in the FSS program for over one (1) year, or partnering with schools to create academic achievement support and/or incentive programs, or other mandatory school attendance programs for residents. We are not proposing any new MTW activities; instead, we are enhancing current approved programs.

HACP Grants: Non Federal Funding Sources			
Funder	Award Date	Amount	Title
Robert Wood Johnson Foundation	April 2021	\$243,000	HCV Mobility Study with Penn State University
Heinz Endowments	October 8, 2021	\$39,600	Mobile Digital Literacy (CyberBus)
Heinz Endowments	February 12, 2021	\$45,000	Community Planning for Glen Hazel

<b>HACP Grants: Federal Funding Sources</b>			
<b>Funder</b>	<b>Award Date</b>	<b>Amount</b>	<b>Title</b>
HUD – FSS	January 24, 2022	\$377,268	Family Self-Sufficiency (1 year)
HUD – ROSS	January 7, 2022	\$461,568	Resident Opportunities & Self-Sufficiency (3 year)
HUD – HCV	April 30, 2021	\$4.1 million	HCV Community Choice Demonstration (with ACHA & ACDHS)
HUD – Emergency Safety & Security	April 12, 2021	\$250,000	Security Cameras for Allegheny Dwellings & Bedford Dwellings
HUD – CNI Planning	December 16, 2020	\$450,000	CNI Planning for Allegheny Dwellings / Fineview Citizens Council (FCC)

In FY 2021, the HACP was awarded five (5) National Association of Housing and Redevelopment Officials (NAHRO) Awards of Merit. These awards included Cornerstone Village-Phase II; Sandstone Quarry-Phase I; Northview Heights Public Safety Center (with the Pittsburgh Bureau of Police) rededicated as the Officer Calvin Hall Public Safety Center in honor of Officer Hall, a fallen officer assigned to the substation; and, Mobile Computer Lab 2.0.

In FY 2022, the HACP was awarded three (3) National Association of Housing and Redevelopment Officials (NAHRO) Awards of Merit. These included the Free Pharmacy Technician Program (with Ebenezer Outreach Ministries and CVS Health); HACP and 412 Food Rescue Expand Deliveries and Eradicate Hunger; and, Eviction Prevention in the Age of COVID-19. Both the Free Pharmacy Technician Program and the HACP-412 Food Rescue Expansion Program were also nominated for NAHRO Awards of Excellence.

In FY 2023, the HACP intends to continue to pursue opportunities for showcasing and highlighting on-going resident initiatives. Any new initiatives will be included in the appropriate portions of Parts III or IV of this or future MTW Annual Plans.



### **Theme Three: Increasing housing choices for low-income families through initiatives designed to increase the quality and quantity of housing available to households utilizing rental assistance and other available resources**

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As the City of Pittsburgh housing market has changed in recent years, the availability of affordable housing has declined. These market changes have affected both naturally occurring affordable units and those available to households utilizing HCVs. In response, the HACP commenced its initial landlord incentives and programs in an attempt to increase the number of landlords participating in the HCV program, and to increase the number and quality of units available. The HACP received approval in the FY 2019 MTW Annual Plan for an alternative payment standard to address the limited housing stock and increased rental costs. In FY 2022, the HACP received HUD approval to change the methodology of all of its HCV payment standards (except for EHV) to be even more competitive in the local rental market thereby attracting new landlords and retaining our existing landlords.

During the on-going implementation of this initiative, the HACP seeks to increase housing choice and encourage voucher participants to expand their housing search, particularly in neighborhoods with low levels of poverty. Recognizing that using a single citywide Voucher Payment Standard (VPS) stimulated voucher holders to reside in low-cost, high-poverty neighborhoods, the HACP devised a robust and comprehensive method for establishing Payment Standards and rent reasonableness determinations. The goals of this activity are to:

- a. Expand housing choices by providing access to more neighborhoods;
- b. Create additional units from previously sub-standard properties and improve the quality of existing units;
- c. Decrease concentration of voucher usage in high poverty areas.

The HACP plans to continue further analysis of these market changes and will pursue additional initiatives targeted to increasing the number and quality of housing options for households utilizing tenant-based rental assistance.

Lastly, the HACP intends to work with partners at the Veterans Administration as well as other industry partners to reduce homelessness. The HACP will utilize Emergency Housing and VASH vouchers in accordance with our MTW administrative flexibilities. It is expected that various funding sources will be utilized to develop these units with a special focus on units to be occupied only by veterans. Furthermore, to remain competitive in the rental housing market and ensure housing choice is available to all HCV participants, the HACP will continue to request HUD waiver approval to utilize its MTW activities in implementing new Special Purpose Voucher programs.

## C. Short-Term Goals and Objectives

### **The HACP's Short-Term Goals are to:**

- Process all applications within thirty (30) days of receipt.
- Effectively improve the HCV voucher utilization rate and lease-up rates in LIPH.
- Ensure that inspections are completed on a timely basis.
- Improve the PIC submission rate and correct any fatal errors in a timely manner.
- Continue to enforce effective policies to minimize any risk for discriminatory practices.
- Seek to continue to remove all barriers to housing for the disabled community.
- Have no fiscal year audit findings.
- Effectively participate in the HUD Community Choice Demonstration to study the effects of mobility-related services on local HCV families.
- Effectively monitor the surveillance equipment to ensure maximum operational efficiency throughout the housing sites.
- Monitor the security resources to include constable, guards and above-baseline services provided by the Pittsburgh Police Department.
- Develop strategic financial plans and revenue forecasts to better accommodate residents.
- Earn positive cash flow.
- Enhance the service provisions for Project-Based Voucher (PBV) recipients.
- Apply for new Resident Opportunity for Supportive Services (ROSS) grants through the available funding source.
- Maximize the use of virtual resources and improve the virtual support for residents.
- Ensure all eligible residents have been offered the opportunity for Family Self Sufficiency (FSS).
- Enhance the eviction prevention ongoing Partnership agreement with the provider to include monitoring statistical reports and ensuring residents are receiving services offered.
- Offer Employment Fairs/Resource Fairs and Workforce Development Meetings.
- Participate in at least five (5) job and career fairs per year.
- Increase the enrollment for Training Programs to include Drivers Ed, Constructions Trade, CNA, CDL, UPMC, and CVS.
- Implement new WOW mobile lab initiatives such as WOW minivan and WOW RV mobile unit.
- Update/upgrade mobile lab program by adding new initiatives.
- Align and improve the HACP Gap Financing program based on local needs and resources.
- Increase professional capacity and expertise of all HACP Staff.
- Review the Opportunity for a “For-Sale Single Family Pilot Program.”
- Increase the number of homebuyers through the HACP Homeownership and OwnPGH programs.

## II. GENERAL HOUSING AUTHORITY OPERATING INFORMATION

### (I) GENERAL OPERATING INFORMATION

#### ANNUAL MTW PLAN

#### A. HOUSING STOCK INFORMATION

##### i. Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP)	0/1 Bdm	2 Bdm	3 Bdm	4 Bdm	5 Bdm	6+ Bdm	TOTAL UNITS	POPULATION TYPE**	Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing / Vision)
Turnkey Development (ACCDC) / Scattered Site North - PA039	0	15	7	0	0	0	22	General	2	2
Larimer/East Liberty Phase V-B/ Scattered Site North-PA039	0	0	2	0	1	0	3	General	0	0
Northview Midrise	36	7	0	0	0	0	43	General	6	2
1204-1206 Arch Street^^	0	6	0	0	0	0	6	General	0	0
7423, 25, 27, and 29 Penn Ave^^	0	4	0	0	0	0	4	General	0	0
<b>Total Public Housing Units to be Added in the Plan Year:</b>							<b>78</b>			

\* The federal accessibility standard under HUD's Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance (24 CFR 8.32). HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice") for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>

\*\* Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

^^ 1204-1206 Arch Street and 7423-7429 Pen Avenue were purchased in 2022 with program income funds. The HACP is currently analyzing the most appropriate program assignment for the units. It is anticipated that this decision will be made in 2022 and that any conversion will occur in 2023.

If "Population Type" is "Other" please describe:

Non-Applicable

**ii. Planned Public Housing Units to be Removed**

Public housing units that the MTW PHA anticipates will be removed during the Plan Year

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Oak Hill MROP PA066	80	HUD approved demolition of MROP public housing units as part of Oak Hill RAD conversion.
New Pennley Place Phase I (AMP PA-001-64)	38	Removal from PIC due to RAD to PBV conversion.
Scattered Site North (AMP PA001000039)	1	6535 Rowan Street, Pittsburgh, PA 15206. This property is beyond repair. Upon demolition, the site will be utilized for affordable housing development.
<b>TOTAL:</b> Public Housing Units to be Removed in the Plan Year	119	

**iii. Planned New Project-Based Vouchers**

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).

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD	DESCRIPTION OF PROJECT
Larimer/East Liberty Phase III	19	No	CNIG replacement units
Larimer/East Liberty Phase IV	18	No	CNIG replacement units
Bedford Redevelopment Phase I	90	No	First phase of lower Bedford Dwellings redevelopment (using PBV + Gap Financing, new construction, and/or acquisition/rehabilitation)
City's Edge Residential Development	92	No	PBV in non-traditional mixed- finance development
New Granada Square	10	No	PBV + Gap Financing
Manchester Redevelopment	86	Yes	RAD/PBV
Harvard Beatty Street Housing	8	No	PBV + Gap Financing
Stanton-Highland Apartments	23	No	PBV + Gap Financing
Gladstone Residences	20	No	PBV + Gap Financing
Fifth Dinwiddie	35	No	PBV + Gap Financing
Cedarwood Homes	24	No	PBV + Gap Financing
2159 Centre Avenue	12	No	PBV + Gap Financing
Letsche School Apartments	25	No	PBV + Gap Financing
<b>TOTAL:</b> Planned new Project Based Units in Plan Year	<b>462</b>		

**iv. Existing Project-Based Vouchers**

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. Select one of the following to indicate the \*Planned Status by the End of Plan Year: “Committed, Leased, or Issued.” In column three, indicate if the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Skyline Terrace (Addison Phase I)	168	Leased	No	HAP Contract in place. First Phase of Addison Redevelopment
Lofts at Bentley (Addison Phase II)	64	Leased	No	HAP Contract in place. Phase II at Addison Terrace Redevelopment
Addison Phase III (Middle Hill)	37	Leased	No	HAP Contract in place. Third phase of Addison Terrace Redevelopment
Addison Phase IV (Kelly Hamilton Homes)	42	Leased	No	HAP Contract in place. Fourth and final phase of Addison Terrace Redevelopment
Allegheny Dwellings I (Sandstone Quarry)	47	Leased	No	HAP Contract in place. Phase I of Allegheny Dwellings Redevelopment
Allegheny Union Baptist Association	36	Leased	No	HAP Contract in place. Senior building.
Crawford Square	60	Leased	No	Part of multi-stage HAP Contract is in place. Currently undergoing modernization.
Dinwiddie III and IV	24	Leased	No	HAP Contract in place.
Doughboy	9	Leased	No	HAP Contract in place.
East Liberty Place South	6	Leased	No	HAP Contract in place.
Hillcrest Senior Apartments	16	Leased	No	HAP Contract in place.



Larimer Pointe	40	Leased	No	HAP Contract in place.
Larimer/East Liberty Phase I	28	Leased	No	HAP Contract in place.
Legacy Apartments (Senior)	18	Leased	No	HAP Contract in place. Senior building.
Mackey Lofts	11	Leased	No	HAP Contract in place. Building for hearing-impaired households.
Millers Street Apartments	9	Leased	No	PBV/Gap Financing. HAP Contract in place.
New Granada Square Apartments	10	Committed	No	PBV/Gap Financing. 2022 Construction Completion.
North Negley Residences	13	Committed	No	PBV/Gap Financing. 2022 Construction Completion.
Elmer Williams Square	37	Leased	No	PBV/Gap Financing. HAP Contract in place.
Milliones Manor (Senior)	39	Leased	No	HAP Contract in place. Senior building.
Wood Street Commons	65	Leased	No	HAP Contract in place. Single room occupancy (SRO) units located downtown.
Mellon's Orchard South	8	Leased	No	HAP Contract in place.
Sycamore Street Apartments	15	Leased	No	HAP Contract in place.
Lemington Senior Housing	54	Leased	No	HAP Contract in place.
Gladstone Residents	20	Committed	No	PBV/Gap Financing. 2023 Construction Completion.
<b>TOTAL:</b> Planned Existing Project-Based Vouchers	<b>876</b>			

**v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year**

<b>PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE FY 2023 PLAN YEAR</b>
Possible addition of scattered site units through acquisition and rehabilitation.
Potential disposition of vacant lots and select deteriorating scattered sites properties.
Potential demolition of vacant, obsolete 80 MROP public housing units in Oak Hill pursuant to HUD RAD demolition approval. This activity is contingent upon financial closing of the MROP redevelopment project, which has been delayed until 2023.
The HACP and the ARMDC will continue to add local non-traditional units, i.e., PBV units funded by HACP/ARMDC's Gap Financing or PBV-only Request for Proposals (RFP) or HCV Project Based Rental Assistance units.
Allegheny Dwellings Choice Neighborhoods Planning Grant (was awarded in December 2020) therefore, potential submission of a RAD-PBV application for Allegheny Dwellings public housing.
Bedford Dwellings Redevelopment Phase 1 will pursue senior-preferred or -designated PBV-unit apartment building as much as it is supported by the HACP waitlist and market study. As outlined in the HACP's HCV Administrative (Admin) Plan, one of the local preferences is for elderly households (Note: An elderly household is defined as a household where the head, spouse, or co-head is age 62 or older). The senior status of each PBV unit will be identified in the HAP Contract for Bedford Dwellings Redevelopment Phase 1, as outlined in PIH Notice 2017-2.
The HACP plans to develop a demonstration project, VASH PBV Tiny Homes, in partnership with local veterans' service providers and the local U.S. Department of Veteran's Affairs office.
The HACP is preparing a new initiative with PBV for eligible independent students in partnership with Pittsburgh Scholar House.

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR					
<p>The HACP plans a variety of capital improvements in its properties. Under MTW single fund flexibility, some will be funded by Capital Fund and some by other sources. Referenced herein are activities by development that are a continuation from prior years as well as new activities for the plan year. Additional information is included in Section V and appendices.</p>					
	Site Improvements	Building Exterior Improvements	Building Systems Improvements	Dwelling Unit Interior Improvements	Common Area Improvements
Central Maintenance	X	X	X		X
Bedford Dwellings	X	X	X	X	
Pennsylvania Bidwell	X	X	X	X	X
Pressley Street High Rise	X	X	X	X	X
Allegheny Dwellings	X	X			X
Northview Heights	X	X	X	X	X
Homewood North	X	X	X	X	X
Arlington Heights	X	X	X	X	X
Scattered Sites South	X	X	X	X	
Scattered Sites North	X	X	X	X	X
Murray Towers	X	X	X	X	X
Frank Mazza Pavilion	X				X
Caliguiri Plaza	X	X	X		X
Finello Pavilion	X	X	X		X
Morse Gardens	X	X	X	X	X
Carrick Regency		X	X	X	X
Gualtieri Manor	X	X	X	X	X
<p><b>Authority Wide:</b> Utility Infrastructure Systems Engineering Services, Architectural and Engineering Services, Environmental Services, Hazardous Materials Work, Construction Management Services, Interim REAC/Safety Repairs</p>					

## B. LEASING INFORMATION

### i. Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Annual 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	34,188	2,849
MTW Housing Choice Vouchers (HCV) Utilized	65,148	5,429
Local, Non-Traditional: Tenant-Based^	N/A	N/A
Local, Non-Traditional: Property-Based^	2,400	200
Local, Non-Traditional: Homeownership^	300	25
<b>Planned Total Households Served:</b>	<b>102,036</b>	<b>8,503</b>

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

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

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

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	N/A	N/A	N/A
Property-Based	Step up to Market Financing MTW (Activity 9)	2,400	200
Homeownership	Homeownership Program: Operation of Combined LIPH and HCV Homeownership Program; Program assistance to include soft-second MTW (Activity 7)	300	25

\* 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.

**ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing**

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	<p>The HACP's occupancy rate continues to be negatively impacted by thirty-four (34) vacant units at Northview Heights Hi-Rise and fifteen (15) vacant units at Manchester. Once final approval is received from HUD, these units will be moved to an offline status, which will improve the overall occupancy rate of the portfolio. Additionally, the HACP continues to work aggressively to quickly prepare vacant units for occupancy. The occupancy and leasing teams work in concert to ensure units are leased as quickly as possible once the units are ready. The HACP anticipates reaching a 96% occupancy rate by the second quarter of 2023 and will strive for the HUD goal of 98% by September 2023. To assist with facilitation of increasing the occupancy rate, the HACP will continue to hire outside contractors. The HACP has utilized this practice previously at PA Bidwell High-Rise and it was very successful.</p>
MTW Housing Choice Voucher	<p>Challenges are expected as rents continue to rise particularly in emerging neighborhoods once affordable under the current FMR. Older housing in Pittsburgh continues to fail HQS inspections and there is a scarcity of landlords. The HACP plans to increase lease up through new landlord incentives and the approved alternative payment standard. Lastly, to ensure housing choice is available to all HCV participants, in September 2021, the HACP requested waiver approval to utilize all related MTW activities for each of its Special Purpose Voucher programs to include the Emergency Housing Vouchers and will continue to do so as new Special Purpose Voucher programs emerge. The landlord incentives and mobility-related services offered, as part of the HUD Community Choice Demonstration and Emergency Housing Voucher Programs will assist the HACP attract and retain HCV landlords thereby assisting the HACP in overcoming local rental market issues.</p>
Local, Non-Traditional	<p>Small community-based developers are not familiar with HUD and the HACP rules and regulations for the PBV/Gap Financing program. The HACP has created PBV/Gap Financing Program &amp; Underwriting Guidelines and will continue to update the Guidelines as needed. The HACP will continue to share these guidelines with developers so that they are in a position to submit appropriate proposals.</p>

### C. WAITING LIST INFORMATION

#### i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The “Description” column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Public Housing	Site-Based	3,150	Open	Yes
Housing Choice Voucher	Tenant Based Vouchers	4,100	Closed	Yes
Homeownership	N/A	N/A	N/A	N/A
Project-Based Vouchers	Site-Based	23,350	Partially Open	Yes

#### Please describe any duplication of applicants across waiting lists:

There may be duplications between the Low-Income Public Housing (LIPH) and Housing Choice Voucher program lists. The Project-Based Voucher (PBV) Waiting List may have duplicates across lists. Properties are also privately managed and waiting lists open and close based upon demand. The Homeownership program does not have a waiting list established for this program. Program participation is open to otherwise eligible families; if demand for soft second mortgage assistance approaches the budget limit, a waiting list of participants with mortgage pre-approval letters will be established.

#### ii. 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 WAITING LIST
Public Housing	All lists remain open.
Housing Choice Voucher	The HCV general waiting list is expected to reopen in FY 2023. The new PBV site-based waiting lists may open in late FY 2022 or sometime in FY 2023, and the existing PBV site-based waiting lists may reopen in late FY 2022 or sometime in FY 2023.



### III. PROPOSED MOVING TO WORK (MTW) ACTIVITIES: HUD-APPROVAL REQUESTED

#### 1. Asset Exclusion & Self-Certification in HCV and Public Housing Programs

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##### A. Activity Description

##### i. General Description

The HACP believes that this activity will drastically improve program efficiency and limits the burden on program participants by decreasing the amount of documentation needed. The HACP proposes the following policies regarding asset self-certification, verification, and calculations:

##### **Assets Valued at \$50,000 or Less**

- **Verification.** The HACP will accept a self-certification of asset value and/or income as the highest form of verification when the total household asset value is \$50,000 or less.
- **Asset Income Calculations.** The HACP will exclude all income from assets where the total household asset value and/or income are \$50,000 or less.

##### **Assets Valued at Over \$50,000**

- **Verification.** The HACP will verify asset value and/or income in accordance with regular HUD verification requirements when the total household asset value and/or income are over \$50,000.
- **Asset Income Calculations.** The HACP will include all income from assets where the total household asset value and/or income are over \$50,000.

The table below summarizes the proposed changes:

	Assets Valued at \$50,000 or Less	Assets Valued at Over \$50,000
Verification Requirements	Self-certification as the highest form of verification	Verify assets in accordance with regular HUD verification requirements
Asset Income Calculations	Exclude all income from assets	Include asset income in accordance with regular HUD asset calculation requirements

## **ii. Relation to Statutory Objectives**

This activity meets the three (3) statutory objectives in the following ways:

### **a. Cost Effectiveness**

This proposed activity will streamline asset verification and calculation such that the staff hours are projected to be reduced by 96%, thereby reducing the total annual costs of verifying and calculation asset value and/or income by the same percentage, or \$759,709 (\$791,364 x .96). For example, if this activity was implemented in May 2022, the total HAP dollars projected to be lost due to asset exclusion is \$6,012 annually, and the Public Housing rental revenue lost is projected to be \$5,736 annually. In summary, the HACP is projected to save approximately \$759,709 in costs and staff time while only spending/losing approximately \$11,748 in HAP and Public Housing rental revenue.

### **b. Provides Incentives for Families to Attain Self-Sufficiency**

Unlike before, the household's final asset income will not be included in the rent calculations, if the total asset value and/or income are less than \$50,000. Therefore, the 48% of families currently reporting assets in the HCV and Public Housing programs and any other families on either program will be able to save up to \$50,000 and not have their rent portion increase as their total asset value increases. However, the HACP did not add any self-sufficiency metrics to this activity as it would defeat the purpose of excluding (and thereby not verifying) asset income.

### **c. Increase Housing Choice**

Since the percentage of HCV and Public Housing families where the asset income impacts the tenant rent portion is so low, the HACP does not see a connection between the increase in housing choice statutory objective and this proposed activity. The families will not benefit from increase in housing choice by utilizing this activity alone.

## **iii. Anticipated Implementation Schedule**

The HACP plans to implement this new activity at the beginning of the fiscal year, January 1, 2023, or upon receipt of HUD approval for the FY 2023 MTW Annual Plan, whichever is later. The HACP will require self-certification of assets \$50,000 or less, or verification of assets over \$50,000 at admission to the program, the family's next regular biennial reexamination, or if the family moves to a new unit, whichever occurs first.

## B. Activity Metrics Information

### i. Applicable Metric Charts

<i>Cost Effectiveness</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>CE #1: Agency Cost Savings</b>	Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars). \$791,364	Expected cost of task after implementation of the activity (in dollars). \$126,618	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
<b>CE #2: Staff Time Savings</b>	Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours). 14,756 hours	Expected amount of staff time dedicated to the task after implementation of the activity (in hours). 2,361 hours	Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.

### ii. Overall and/or Long-Term Benchmarks

Overall, the HACP is projecting that the actual agency cost savings and staff time savings will be 8% or less of the baseline costs and staff time once new activity reaches all HCV and Public Housing families. However, since the HACP conducts biennial reexaminations the HACP will mostly likely meet these benchmarks two (2) to four (4) years after implementation.

<i>Cost Effectiveness</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>CE #1: Agency Cost Savings</b>	Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars). \$791,364	Expected cost of task after implementation of the activity (in dollars). \$63,309	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
<b>CE #2: Staff Time Savings</b>	Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours). 14,756 hours	Expected amount of staff time dedicated to the task after implementation of the activity (in hours). 1,180 hours	Actual amount of staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.

### iii. Data Source(s)

The data sources for this proposed activity's metrics are from MTW HUD-50058 data reported in the HACP's Emphasys Elite software - specifically, a Crystal report containing lines 18f, Total Cash Value of Assets, and 18j, Final Asset Income for both the HCV and Public Housing programs. The average time taken to verify and calculate assets was estimated from various staff experience, and the average reexamination costs was taken from the average hourly rate of HCV Housing Specialists and Public Housing Site Managers.

## C. Cost Implications

### i. Anticipated Cost Implications

As of May 2022, approximately 48% of households reported assets. Of these 3,689 households, only 4% (154) received income from assets that exceeded the threshold amount to impact their tenant portion. Since the total number of households with income from assets is small, eliminating asset verification (and thereby asset calculations) for any self-reported dollar amount at \$50,000 or less will have a minimal impact on rent calculations for these households. The HACP estimates that verifying and calculating assets takes roughly 4 hours during an examination for a cost of approximately \$53.63 per examination. In FY 2022, the HACP calculated assets 3,689 times and spent approximately 14,756 hours (4 x 3,689) and \$791,364 (\$53.63 x 14,756). As of May 2022, the HACP projects that it will spend/lose approximately \$11,748 in HAP and Public Housing rental revenue, respectively. Therefore, the overall staff time and cost savings (\$759,709 from paragraph A.ii.a., Cost Effectiveness) will far outweigh the HAP dollar cost/ Public Housing rental revenue lost to the Authority (\$11,748) if asset income under \$50,000 is excluded from the rent calculations in both the HACP and Public Housing programs.

### ii. Managing the Cost Implications

With the implementation of this policy, the HACP does not project there to be an increase in cost. If there is a cost factor involved, the HACP will offset any Public Housing rental revenue lost and/or additional HCV HAP utilized as result of this activity with operating funds reserves. The staff time and cost savings could help the HACP create and hire more positions within the appropriations salary cap restriction, or fund new initiatives at the HACP.

## D. Need/Justification for MTW Flexibility

### Authorization

Attachment C (D)(2)(a)  
Attachment C (D)(3)(b)  
Attachment C (C)(4)  
Attachment C (C)(11)

### Regulatory Citation

24 CFR 982.508, 982.503, and 982.518  
24 CFR 982.516  
24 CFR 966.4 and 960.257  
24 CFR 5.603 and 5.634

#### i. Explanation of Authorization Need

**HCV:** 24 CFR 982.516(a)(3) states that a PHA may accept a family's declaration that it has net assets equal to or less than \$5,000, without taking additional steps to verify the accuracy of the declaration. However, to be more cost effective and maximize staff timesaving, the HACP would like to use the MTW authorization cited above to accept a household's self-certification that it has net assets equal to or less than \$50,000, without taking additional steps to verify the accuracy of the declaration and to exclude the asset income from the family's rent calculations. Furthermore, this policy will change the way that the HACP conducts initial eligibility (by allowing self-certification of assets), and to ignore those self-certified assets as part of the rental calculations in the years to follow. The HACP will utilize the other authorization and regulatory citations as applicable.

**Public Housing:** 24 CFR 5.603 defines how to determine net family assets as well as annual income, which is also cross-referenced in 24 CF 5.609. The HACP wishes to adopt and implement through its MTW authority what it considers as a "reasonable" policy, as stated in Attachment C (C)(11) of the MTW Standard Agreement, "...for setting rents in public housing including but not limited to establishing definitions of income and adjusted income, or earned income disallowance that differ from those in current statutes or regulations." Specifically, altering the definition of assets valued equal to or less than \$50,000 requires a change to the regulation stating that a PHA must count net family assets listed in 24 CFR 5.603 and 5.609 as income.

By affecting a family's annual income calculations, this policy also affects Public Housing family's initial eligibility determination, and biennial and interim reexamination requirements. As described in 24 CFR 960.257 and eligibility/lease requirements in 24 CFR 966.4, assets are typically verified and counted as income during the initial eligibility screening, at biennial reexamination, and during interim reexaminations if they change reported involves a change in assets. The HACP is proposing to not verify assets if the total household asset income is less than \$50,000, which means that if approved, it will not verify or count these assets as income at the initial eligibility determination, or biennial or interim reexamination.

## E. Rent Reform/Term Limit Information (if applicable)

### i. Impact Analysis

Overall, the elimination of assets over \$50,000 has minimal impact on participant households and will reduce the asset documentation that they must supply. Instead of supplying 6-months' worth of bank statements for a checking account, applicant and participant households in the HCV and Public Housing programs will only need to sign a self-declaration form, if their net asset value is equal to or less than \$50,000. In addition, participants in both programs will gain the benefit of having income from assets omitted in future rent calculations, as long as the total household asset value remains less than \$50,000. The HACP will implement this activity at new admission, biennial reexamination, or unit transfer. The HACP will monitor the HAP and Public Housing rental revenue levels and report any unintended consequences/impacts in the MTW Report, as necessary.

The HACP took a snapshot of MTW HUD-50058 data on May 9, 2022 for both the HCV and Public Housing programs. The results are as follows:

	HCV	LIPH
Total Number of Households	5,397	2,223
Number of Households Reporting Assets	2,700	989
Percent of Households Reporting Assets	50%	44%
Number of Households Where Asset Income Impacts Tenant Rent	116	38
Percent of Households Where Asset Income Impacts Tenant Rent	4%	4%
Number of Households Receiving Less Than \$100 in Asset Income	30	4
Percent of Households Receiving Less Than \$100 in Asset Income	1%	0%

There are 154 total households in both programs where the asset income impacts the tenant rent portion. Of the 7,620 HCV and Public Housing households analyzed, 4% (154) of households would be affected by this activity should it have been implemented on May 9, 2022. For all 154 households, the tenant rent portion would have decreased if we didn't count their asset income. In terms of HCV rent burden, the largest difference in Total Tenant Payment (TTP) was \$32, which may cause a household's portion of rent to be above 40% of the household's adjusted monthly income. However, the HACP has the modified HCV policy on the maximum percent of adjusted monthly income allowable. In other words, the household would still be able to lease the unit by signing a rent burden letter to state that they agree to pay over 40% of their adjusted income towards rent.



## **ii. Hardship Case Criteria**

If a participant loses income from assets at any time and said loss affects the tenant portion of the rent, the participant may request an interim re-examination to adjust their rent calculation. Should a reduction in income due to loss of assets occur, normal interim re-examination policies will take effect and the reduction in asset income will be verified per the HUD Verification Hierarchy in PIH Notice 2018-18, only if the total household asset income is more than \$50,000.

## **iii. Annual Reevaluation Description**

The HACP will pull Crystal reports from Emphasys Elite for each MTW Annual Report containing MTW HUD-50058 asset income data in the HCV and Public Housing programs. The specific MTW HUD-50058 lines used include 18f, Total Cash Value of Assets, and 18j, Final Asset Income for both the HCV and Public Housing programs. The average time taken to verify and calculate assets will be estimated from various staff experience, and the average reexamination costs will be determined by averaging the hourly rate of HCV Housing Specialists and Public Housing Site Managers for that given fiscal year. Should any of the metric outcomes not exceed the benchmarks, the HACP will reevaluate the activity and suggest any changes in the next available MTW Annual Plan.

## **iv. Transition Period**

As stated in previous sections, the HACP plans to implement this new activity at the beginning of the fiscal year, January 1, 2023, or upon receipt of HUD approval for the FY 2023 MTW Annual Plan, whichever is later. Upon notification of HUD approval, the HACP will first train staff on the new policy change and create a household self-declaration form that the head of household will sign to document that their net asset value is less than or equal to \$50,000. After the training is complete, the activity will be implemented the first day of the following month, however, will not be implemented before the start of the fiscal year. All new admissions, regular biennial reexaminations, or unit transfers with effective dates on or after the implementation date will require self-certification of net asset values of \$50,000 or less, or verification of assets over \$50,000.

#### IV. APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

Activity	Plan Year Approved	Plan Year Implemented	Plan Year(s) Amended
1. Pre-Approval Inspection Certification	2015	2015	2019
2. Preferred Owners Program	2015	2015	Has not been amended
3. Modified Rent Policy - Work or FSS Requirement or increased minimum tenant payment for non-exempt HCV households	2011	2011	Has not been amended
4. Modified Rent Policy - Work or FSS Requirement or increased minimum rent for non-exempt LIPH households	2008	2008-2009	Has not been amended
5. HCV Revised Recertification Policy – At least once every other year	2008	2008	Has not been amended
5. LIPH Revised Recertification Policy – At least once every other year	2009	2009	Has not been amended
6. Homeownership Program: a. Operation of Combined LIPH and HCV Homeownership Program; b. Program assistance to include soft-second mortgage assistance, closing cost assistance, homeownership and credit counseling, and foreclosure prevention. To establish a soft-second mortgage waiting list; expand eligibility to persons on the LIPH and HCV program waiting lists; expand eligibility to persons eligible for LIPH	2007 (Combined Program)	2007	2010 – Addition of other elements  2014 – Expansion of eligibility to person eligible for LIPH  2020 – Revised program manual

7. Modified Housing Choice Voucher Program policy on maximum percent of Adjusted Monthly Income permitted.	2001	2001	Has not been amended
8. Modified Payment Standard Approval	2004	2004	2013 – Amended for persons with disabilities for exception areas 2022 – Amended for consistency with HUD Community Choice Demonstration
9. Step Up To Market Financing Program <i>[Use of Block Grant Funding Authority for Development, Redevelopment, and Modernization to include Local Non-Traditional Development i.e., Project-Based Vouchers and Gap Financing]</i>	2012	2013	2017 – Additional features
10. Local Payment Standard – Housing Choice Voucher Program	2019	2019	2022 – Amended for consistency with HUD Community Choice Demonstration

## A. Implemented Activities

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### 1. Pre-Approval Inspection Certification

#### i. **Plan Year Approved, Implemented, and Amended:**

- **FY 2015:** Approved and implemented
- **FY 2019:** Amended to expand the timeframe in which a landlord can use a pre-inspection to 90 days and to make this activity available for any HCV landlord.

#### **Authorization**

Attachment C (D)(5)

Attachment C (D)(1)(d)

#### **Regulatory Citation**

24 CFR 982.311

24 CFR 982 Subpart I

- ii. **Description:** The Pre-Approval Inspection Certification initially applied to buildings with four (4) or more units located within a single structure and the pre-approval process could not be applied to all Housing Choice Voucher (HCV) unit types. In addition, the Pre-Approval Inspection Certification was originally accepted during the 60-day period after the unit passes HQS inspection. However, as stated above, modifications were approved by HUD in FY 2019 to make available Pre-Approval Inspection Certification to all HCV landlords and extend the certification status to a 90-day period after the unit passes HQS inspection. All units seeking Pre-Approval Inspection Certification must be vacant at the time the HQS inspection occurs and must remain vacant until a Request for Tenancy Approval is submitted for the unit. If a Request for Tenancy Approval is submitted after the 90-day qualifying period, a new initial HQS inspection must be performed before the unit is approved for tenancy. HAP payments are not tied to the Pre-Approval Inspection. The HAP payments will begin from the tenancy certification date only.
- iii. **Activity Status:** The HACP continues to actively schedule an increasing number of pre-inspections since the activity was implemented in FY 2019. In fall 2021, the HACP received HUD Special Purpose Voucher waiver approval to utilize this implemented activity for its Emergency Housing Voucher and Mobility Demonstration Voucher programs.
- iv. **Planned Non-Significant Changes:** None.
- v. **Planned Changes to Metrics/Data Collection:** None. Please see the metrics that the HACP intends to continue to use for this activity as follows:

<i>Cost Effectiveness</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>CE #1: Agency Cost Savings</b>	Total cost of task in dollars (decrease).	Cost of inspections prior to implementation of the activity (in dollars). \$677,300 annually	Expected cost of inspections after implementation of the activity (in dollars). \$674,375 annually	Actual cost of inspections after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
<b>CE #2: Staff Time Savings</b>	Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to inspections prior to implementation of the activity (in hours). 15,662.5 hours annually	Expected amount of total staff time dedicated to inspections after implementation of the activity (in hours). 15,630 hours annually	Actual amount of total staff time dedicated to inspections after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.

<i>Housing Choice</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>HC #1: Additional Units of Housing Made Available</b>	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number).  0	Expected housing units of this type after implementation of the activity (number).  30	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

**vi. Planned Significant Changes:** None.

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## 2. Preferred Owners Program

### i. **Plan Year Approved, Implemented, and Amended:**

- **FY 2015:** Approved and implemented
- No amendments since initial HUD-approval.

#### **Authorization**

Attachment C (D)(1)(d)

Attachment C (D)(5)

#### **Regulatory Citation**

24 CFR 982.311

24 CFR 982 Subpart I

- ii. **Description:** The Preferred Owners Program provides incentives to landlords to participate in the HCV Program and to provide quality housing units in a variety of neighborhoods. Participating landlords must consistently pass Housing Quality Standards (HQS) inspections and participate in annual training. In return, they will receive priority placement of their listings on the HACP apartment listings website and can be eligible for the following:

(a) Changes in inspection schedule:

- i. Priority inspection scheduling - Preferred Owners will be moved to the top of the waiting list for annual and initial inspections.
- ii. Biennial inspections - Owners who have passed annual inspection on the first inspection for the past three consecutive years will be moved to biennial inspections. If a future inspection results in a fail, the owner will be removed from the Preferred Owners Program and will return to an annual inspection schedule.
- iii. Acceptance of prior inspections for new tenancies in vacated units - If, after initial inspection and move-in, a unit is vacated for any reason and a new RFTA is returned for a new voucher holder in the same unit within ninety (90) days, the previous inspection will be accepted as the initial inspection for the new RFTA.
- iv. Construction completion inspection to be accepted as initial inspection for project-based voucher units - When PBV owners or property managers are Preferred Owners, the construction completion inspection on a new PBV unit can be used as the initial inspection if the unit is occupied within ninety (90) days of that inspection.



## (b) Vacancy Payments

When a voucher holder moves out, if the landlord releases the unit to another voucher holder, the HACP will issue vacancy payment of two months of the previous tenant's HAP as a HAP Adjustment Vacancy Payment. The impact of this initiative is to encourage landlords to work with the HACP and the HCV program long-term, preserving housing for families at or below 50% AMI.

The landlord incentives in this activity are only available to landlords who meet the criteria of the HACP preferred owners' program.

### **Application for Membership**

In order to gain membership to the Preferred Owners Program, an owner or property manager must apply by submitting a form to the HCV office. The HACP requires separate applications to be submitted for each subsidiary of a company/organization and/or each unique tax identification number. This form will include:

1. Landlord's name;
2. Contact information;
3. Addresses of units currently leased to voucher holders;
4. Checklist of the standards for membership, which are:

#### **a. Consistent HQS Inspection Passes**

Units must have passed inspection at a rate of 85 percent (85%) for all instances of annual inspections for the past four (4) consecutive years.

#### **b. Trainings**

Preferred Owners must complete a minimum of one (1) training per year to maintain membership in the Preferred Owners Program. All trainings will be provided free of charge to all landlords and may be chosen from the following options:

- *Screening Tenants* - Includes information about background checks, references, and Fair Housing law.
- *The Magistrate Process* - Includes information about legal recourse landlords may take if they feel their tenant has broken his or her lease.
- *Mental Health First Aid Training* - This training is provided by Mercy Behavioral Health.
- *Real Estate Continuing Education Credits and/or Other Accredited Property Management Trainings* may also be counted as Preferred Owners trainings, when proof of completion is provided.

## Yearly Program Renewal

To ensure that the Preferred Owners Program members remain the best sources of decent, safe, and affordable housing for our voucher holders, the HACP has developed a process to renew an owner's participation in the Preferred Owners Program on a yearly basis. This process includes the above-mentioned training course and achieving at least an 85 percent (85%) pass rate for all annual HQS inspections conducted during the previous calendar year. If the owner's HQS inspection pass rate is below 85% they will enter a corrective action period of one (1) calendar year where they must bring all of their units to a 100% pass rate and provide evidence of completion of a second qualifying training course as described above.

- vii. Activity Status:** The HACP continues to implement the Preferred Owners Program and recruit potential owners to participate. The number of Preferred Owners has stalled at two (2) in FY 2022 due to the departure of the Landlord Support and Outreach Coordinator. All marketing efforts are on hold until a new Landlord Support and Outreach Coordinator is hired. In fall 2021, the HACP received HUD Special Purpose Voucher waiver approval to utilize this implemented activity for its Emergency Housing Voucher and Mobility Demonstration Voucher programs.
- iii. Planned Non-Significant Changes:** None.
- iv. Planned Changes to Metrics/Data Collection:** None. Please see the metrics that the HACP intends to continue to use for this activity as follows:

<i>Cost Effectiveness</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>CE #1: Agency Cost Savings</b>	Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars). \$5,850	Expected cost of task after implementation of the activity (in dollars). \$7,800	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
<b>CE #2: Staff Time Savings</b>	Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours). 135 hours/year	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours). 67.5 hours/year	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.

<i>Housing Choice</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>HC #1: Additional Units of Housing Made Available</b>	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). 0	Expected housing units of this type after implementation of the activity (number). 120	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>HC #2: Units of Housing Preserved</b>	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Housing units preserved prior to implementation of the activity (number). 0	Expected housing units preserved after implementation of the activity (number). 120	Actual housing units preserved after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<i>HACP Specific Metrics</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>Landlords are enrolled in Preferred Owners Program.</b>	Landlords enrolled in Preferred Owners Program (number).	Landlords enrolled in Preferred Owners Program before the start of the program 0	Expected number of landlords enrolled in Preferred Owners Program 20	Actual number of landlords enrolled in Preferred Owners Program	Whether the outcome meets or exceeds the benchmark.
<b>Increase in landlord satisfaction with HACP</b>	Landlords who rate HACP as “good” or “excellent” (percentage)	Number of landlords who rate HACP as “good” or “excellent” before the start of the program 55%	Expected number of landlords who rate HACP as “good” or “excellent” after six months of the program 55%	Actual number of landlords who rate HACP as “good” or “excellent”	Whether the outcome meets or exceeds the benchmark.

**v. Planned Significant Changes:** None.

### 3. Modified Rent Policy with Work/FSS Requirement for the Housing Choice Voucher Program

#### i. Plan Year Approved, Implemented, and Amended:

- **FY 2011:** Approved and implemented
- No amendments since initial HUD-approval.

#### Authorization

Attachment C (D)(2)(a)

Attachment C (D)(1)

Attachment C (D)(3)(a)

#### Regulatory Citation

24 CFR 982.518

24 CFR 5.628

24 CFR 5.630

- ii. **Description:** Requires that any non-elderly, able-bodied head of household who is not working to either: a) participate in a self-sufficiency program, including but not limited to the HACP FSS program, other Local Self-Sufficiency program (LSS), welfare to work, or other employment preparation and/or training/educational program or b) pay a minimum tenant payment of \$150.00 per month. This policy provides additional incentives for families to work or prepare for work and increases overall accountability.
- iii. **Activity Status:** The HACP continues to operate the \$150 minimum rent requirement with no major issues.
- iv. **Planned Non-Significant Changes:** None.
- v. **Planned Changes to Metrics/Data Collection:** None. Please see the metrics that the HACP intends to continue to use for this activity as follows:

<i>Self Sufficiency</i>					
Metric Name & #	Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
SS #1: Increase in Household Income	Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars). \$11,802	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars). \$12,000	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
SS #2: Increase in Household Savings	Average amount of savings/escrow of households affected by this policy in dollars (increase).	Average savings/escrow amount of households affected by this policy prior to implementation of the activity (in dollars). \$3,789.66	Expected average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars). \$2,900	Actual average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.

<b>SS #3: Increase in Positive Outcomes in Employment Status</b>	Report the following information separately for each category:	Head(s) of households in FSS prior to implementation of the activity (number).	Expected head(s) of work-able households in FSS after implementation of the activity (number).	Actual head(s) of work-able households in FSS after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	(1) Employed Full- Time	736	736		
	(2) Employed Part- Time	737	737		
	(3) Enrolled in Educational Program	50	27		
	(4) Enrolled in Job Training Program	51	28		
	(5) Unemployed	N/A	N/A		
	(6) Other	N/A	N/A		
	Report the following information separately for each category:	Percentage of total work-able households in FSS prior to implementation of activity (percent).	Expected percentage of total work-able households in FSS after implementation of the activity (percent).	Actual percentage of total work-able households in FSS after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	(1) Employed Full- Time	14.305%	20%		
	(2) Employed Part- Time	14.305%	20%		
	(3) Enrolled in Educational Program	11.27%	7.5%		
	(4) Enrolled in Job Training Program	11.27%	7.5%		
	(5) Unemployed	48.5%	45%		
	(6) Other	0%	0		
<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>	Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number).	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
		774	800		
<b>SS #5: Households Assisted by Services that Increase Self Sufficiency</b>	Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
		353	200		

<b>SS #6: Reducing Per Unit Subsidy Costs for Participating Households</b>	Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars). \$466.24	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars). \$575	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
<b>SS #8: Households Transitioned to Self Sufficiency</b>	Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency (a household's ability to maintain financial, housing, and personal/family stability) prior to implementation of the activity (number). 12	Expected households transitioned to self-sufficiency (a household's ability to maintain financial, housing, and personal/family stability) after implementation of the activity (number). 50	Actual households transitioned to self-sufficiency (a household's ability to maintain financial, housing, and personal/family stability) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<b>HACP Metrics</b>					
<b>Metric Name</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>Non-elderly, Non-disabled Families with TTPs Less than \$150</b>	Number of non-elderly, non-disabled families with TTPs <\$150 (decrease)	Total Non-elderly, Non-disabled families with TTPs less than \$150 before this activity was implemented in 2010 (number) 1,988	Expected total Non-elderly, Non-disabled families with TTPs less than \$150 from this activity (number) 530	Actual non-elderly, Non-disabled families with TTPs less than \$150 added (number)	Whether the outcome meets or exceeds the benchmark.
<b>Average Overall HAP</b>	Average HAP dollar amount for all families (increase)	Average HAP for all HCV families before this activity was implemented (in dollars) \$486	Expected Average HAP for all HCV families after the activity is implemented (in dollars) \$615	Actual average HAP for all HCV families (in dollars) \$686	Whether the outcome meets or exceeds the benchmark.
<b>Average HAP for Non-elderly, Non-disabled</b>	Average HAP dollar amount for non-elderly, non-disabled families (increase)	Average HAP for non-elderly, non-disabled HCV families before this activity was implemented (in dollars) \$538	Expected average HAP for non-elderly, non-disabled HCV families after this activity was implemented (in dollars) \$618	Actual average HAP for non-elderly, non-disabled HCV families (in dollars)	Whether the outcome meets or exceeds the benchmark.



<b>Average HAP for Non-elderly, Non-disabled TTPs &lt;\$150</b>	Average HAP dollar amount for non-elderly, non-disabled families with TTPs <\$150 (decrease)	Average HAP for non-elderly, non-disabled HCV families with TTPs <\$150 before this activity was implemented (in dollars) \$657	Expected average HAP for non-elderly, non-disabled HCV families with TTPs <\$150 after this activity was implemented (in dollars) \$642	Actual average HAP for non-elderly, non-disabled HCV families with TTPs <\$150 (in dollars)	Whether the outcome meets or exceeds the benchmark.
<b>Total HCV FSS Participants</b>	Number of HCV FSS participant families (increase)	Total FSS participants before this activity was implemented (number) 448	Expected new FSS participants added from this activity (number) 250	Actual new FSS participants added (number)	Whether the outcome meets or exceeds the benchmark.
<b>HCV FSS Participant Families Working</b>	Number of HCV FSS participant families working (increase)	Total FSS participant families working before this activity was implemented (number) 248	Expected new FSS participant families working added from this activity (number). 160	Actual new FSS participant families working added (number)	Whether the outcome meets or exceeds the benchmark.
	Percentage of HCV FSS participant families working (increase)	Total FSS participant families working before this activity was implemented (percentage) 55%	Expected new FSS participant families working added from this activity (percentage). 75%	Actual new FSS participant families working added (percentage)	Whether the outcome meets or exceeds the benchmark.
<b>HCV FSS Participant Families Graduating from FSS</b>	Number of HCV FSS participant families graduating from FSS (increase)	Total FSS participant families graduating from FSS before this activity was implemented (number) 12	Expected new FSS participant families graduating from FSS added from this activity (number). 51	Actual new FSS participant families graduated from FSS added (number)	Whether the outcome meets or exceeds the benchmark.
<b>HCV FSS Participant Families with Escrow Accounts</b>	Number of HCV FSS participant families with escrow accounts (increase)	Total FSS participant families with escrow accounts before this activity was implemented (number) 191	Expected new FSS participant families with escrow accounts added from this activity (number). 200	Actual new FSS participant families with escrow accounts added (number)	Whether the outcome meets or exceeds the benchmark.

**vi. Planned Significant Changes:** None.

#### 4. Modified Rent Policy with Work/FSS Requirement for the Public Housing Program

**i. Plan Year Approved, Implemented, and Amended:**

- **FY 2008-2009:** Approved and implemented
- No amendments since initial HUD-approval.

**Authorization**

Attachment C (C)(11)

Attachment D (C)(3)

**Regulatory Citation**

24 CFR 5.630

- ii. Description:** This activity requires that any non-elderly, able-bodied head of household who is not working to either participate in the FSS Program or pay a minimum rent of \$150 per month. Hardship exemptions are permitted. This policy provides additional incentives for families to work or prepare for work. The HACP's objectives for this program include increased participation in the FSS Program, increased rent collections, and increased level of families working.
- iii. Activity Status:** The HACP continues to operate the \$150 minimum rent requirement with no major issue at hand.
- iv. Planned Non-Significant Changes:** None.
- v. Planned Changes to Metrics/Data Collection:** The HACP is proposing to keep the overall metrics the same, however, is updating some of the benchmarks. Please see the metrics that the HACP intends to continue to use for this activity as follows:

<i>Self Sufficiency</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>SS #1: Increase in Household Income</b>	Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars). \$11,268	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars). \$12,000	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.

<b>SS #2: Increase in Household Savings</b>	Average amount of savings/escrow of households affected by this policy in dollars (increase).	Average savings/escrow amount of households affected by this policy prior to implementation of the activity (in dollars). \$1,772	Expected average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars). \$2,700	Actual average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
<b>SS #3: Increase in Positive Outcomes in Employment Status</b>	Report the following information separately for each category:	Head(s) of households in FSS prior to implementation of the activity (number).	Expected head(s) of work-able households in FSS after implementation of the activity (number).	Actual head(s) of work-able households in FSS after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	(7) Employed Full- Time	310	288		
	(8) Employed Part- Time	310	287		
	(9) Enrolled in Educational Program	44	27		
	(10) Enrolled in Job Training Program	44	28		
	(11) Unemployed	N/A	N/A		
	(12) Other	N/A	N/A		
	Report the following information separately for each category:	Percentage of total work-able households in FSS prior to implementation of activity (percent).	Expected percentage of total work-able households in FSS after implementation of the activity (percent).	Actual percentage of total work-able households in FSS after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	(7) Employed Full- Time	10.86%	11%		
	(8) Employed Part- Time	10.86%	11%		
	(9) Enrolled in Educational Program	7%	7.5%		
	(10) Enrolled in Job Training Program	7%	7.5%		
	(11) Unemployed	64.28%	63%		
	(12) Other	0%	0		

<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>	Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number).  637	Expected number of households receiving TANF after implementation of the activity (number).  315	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>SS #5: Households Assisted by Services that Increase Self Sufficiency</b>	Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number). 634	Expected number of households receiving self-sufficiency services after implementation of the activity (number). 403	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>SS #7: Increase in Agency Rental Revenue</b>	Total Household contributions towards housing assistance (increase).	Household contributions prior to implementation of the activity (in dollars). \$626,041	Expected household contributions after implementation of the activity (in dollars). \$656,166	Actual household contributions after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
<b>SS #8: Households Transitioned to Self Sufficiency</b>	Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency (a household's ability to maintain financial, housing, and personal/family stability) prior to implementation of the activity (number). 7	Expected households transitioned to self-sufficiency (a household's ability to maintain financial, housing, and personal/family stability) after implementation of the activity (number). 50	Actual households transitioned to self-sufficiency (a household's ability to maintain financial, housing, and personal/family stability) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<i>HACP Metrics</i>					
<b>Metric Name</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>Total LIPH FSS Participants</b>	Number of LIPH FSS participant families (increase)	Total FSS participants before this activity was implemented (number) 658	Expected new FSS participants added from this activity (number) 500	Actual new FSS participants added (number)	Whether the outcome meets or exceeds the benchmark.

<b>LIPH FSS Participant Families Working</b>	Number of LIPH FSS participant families working (increase)	Total FSS participant families working before this activity was implemented (number) 181	Expected new FSS participant families working added from this activity (number). 300	Actual new FSS participant families working added (number)	Whether the outcome meets or exceeds the benchmark.
	Percentage of LIPH FSS participant families working (increase)	Total FSS participant families working before this activity was implemented (percentage) 28%	Expected new FSS participant families working added from this activity (percentage). 50%	Actual new FSS participant families working added (percentage)	Whether the outcome meets or exceeds the benchmark.
<b>LIPH FSS Participant Families Graduating from FSS</b>	Number of LIPH FSS participant families graduating from FSS (increase)	Total FSS participant families graduating from FSS before this activity was implemented (number) n/a	Expected new FSS participant families graduating from FSS added from this activity (number). 25	Actual new FSS participant families graduated from FSS added (number)	Whether the outcome meets or exceeds the benchmark.
<b>LIPH FSS Participant Families with Escrow Accounts</b>	Number of LIPH FSS participant families with escrow accounts (increase)	Total FSS participant families with escrow accounts before this activity was implemented (number) 29	Expected new FSS participant families with escrow accounts added from this activity (number). 54	Actual new FSS participant families with escrow accounts added (number)	Whether the outcome meets or exceeds the benchmark.
<b>HACP Rent Roll Amounts</b>	Dollar amount of LIPH Rent Rolls (increase)	Total rent charged before this activity was implemented (in dollars) \$685,682	Expected total rent charged after this activity was implemented (in dollars) \$645,000	Actual rent charged for LIPH participant families (in dollars)	Whether the outcome meets or exceeds the benchmark.
<b>HACP Rent Collection Amounts</b>	Dollar Amount of LIPH Rent Collected (increase)	Total rent collected before this activity was implemented (in dollars) \$612,027	Expected total rent collected after this activity was implemented (in dollars) \$665,000	Actual rent collected for LIPH participant families (in dollars)	Whether the outcome meets or exceeds the benchmark.
<b>Average Rent All Communities</b>	Average Rent dollar amount (increase)	Average rent amount for all communities before this activity was implemented (in dollars) \$198.88	Expected average rent amount for all communities after this activity was implemented (in dollars) \$225	Actual average rent amount for all communities (in dollars)	Whether the outcome meets or exceeds the benchmark.

<b>Number of Families Working</b>	Number of families reporting wage income (increase)	Families reporting wage income before this activity was implemented (number) 713	Expected families reporting wage income after this activity was implemented (number) 730	Actual families reporting wage income (number)	Whether the outcome meets or exceeds the benchmark.
<b>Percentage of Families Working</b>	Percentage of families reporting wage income (increase)	Families reporting wage income before this activity was implemented (percentage) 22%	Expected families reporting wage income after this activity was implemented (percentage) 30%	Actual families reporting wage income (percentage)	Whether the outcome meets or exceeds the benchmark.

**vi. Planned Significant Changes:** None.

## 5. Revised Recertification Requirements Policy

### i. **Plan Year Approved, Implemented, and Amended:**

- **FY 2008:** Approved and implemented for LIPH.
- **FY 2009:** Approved and implemented for HCV
- No amendments since initial HUD-approval.

#### **Authorization**

Attachment C (C)(4)

Attachment C (D)(1)(c)

#### **Regulatory Citation**

24 CFR 960.257

24 CFR 982.516

ii. **Description:** The HACP may operate both the LIPH and the HCV Programs with a recertification requirement modified to at least once every two (2) years. Changes in income still must be reported, and standard income disregards continue to apply. This policy change reduces administrative burdens on the Authority, thereby reducing costs and increasing efficiency. The HACP's objectives for this initiative are reduced staff time and thus reduced costs, and improved compliance with recertification requirements by tenants and the HACP.

viii. **Activity Status:** The HACP continues to process recertifications at least once every two (2) years; however, is exploring other changes to this policy to lessen the administrative burden set forth as the program grows. In fall 2021, the HACP received HUD Special Purpose Voucher waiver approval to utilize this implemented activity for its Emergency Housing Voucher and Mobility Demonstration Voucher programs.

iii. **Planned Non-Significant Changes:** None.

iv. **Planned Changes to Metrics/Data Collection:** None. Please see the metrics that the HACP intends to continue to use for this activity as follows:

<i>Cost Effectiveness</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>CE #1: Agency Cost Savings</b>	Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
		\$294,965 (HCV) \$208,942 (LIPH)	\$246,698 (HCV) \$112,623 (LIPH)		



<b>CE #2: Staff Time Savings</b>	Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).  11,000 hours (HCV) 7,792 hours (LIPH)	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).  9,200 hours (HCV) 4,200 hours (LIPH)	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
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<i>HACP Metrics</i>					
<b>Metric Name</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>Number of Annual Recertifications</b>	Total number of annual recertifications (decrease).	Total annual recertifications prior to implementation of the activity (number) 2,698 (HCV) 2,587 (LIPH)	Expected annual recertifications after implementation of the activity (number) 2,650 (HCV) 1,200 (LIPH)	Actual annual recertifications conducted in the plan year (number)	Whether the outcome meets or exceeds the benchmark.
<b>Number of Interim Recertifications</b>	Total number of interim recertifications (decrease).	Total interim recertifications prior to implementation of the activity (number) 1,889 (HCV) 1,052 (LIPH)	Expected interim recertifications after implementation of the activity (number) 2,300 (HCV) 1,250 (LIPH)	Actual interim recertifications conducted in the plan year (number)	Whether the outcome meets or exceeds the benchmark.
<b>Total Recertifications</b>	Total number of recertifications (decrease)	Total recertifications prior to implementation of the activity (number) 4,596 (HCV) 3,639 (LIPH)	Expected recertifications after implementation of the activity (number) 4,950 (HCV) 2,450 (LIPH)	Actual recertifications conducted in the plan year (number)	Whether the outcome meets or exceeds the benchmark.
<b>Average Cost per Recertification</b>	Average cost per recertification	Average cost per recertification prior to implementation of the activity (dollar) \$53.63 (HCV & LIPH)	Average cost per recertification after implementation of the activity (dollar) \$53.63 (HCV & LIPH)	Actual average cost per recertification conducted in the plan year (dollar)	Whether the outcome meets or exceeds the benchmark.
<b>Total Estimated Costs</b>	Total estimated costs (decrease)	Total cost per recertification prior to implementation of the activity (dollar) \$246,487 (HCV) \$195,160 (LIPH)	Total cost per recertification after implementation of the activity (dollar) \$265,468 (HCV) \$131,393 (LIPH)	Actual total cost per recertification conducted in the plan year (dollar)	Whether the outcome meets or exceeds the benchmark.

**v. Planned Significant Changes: None.**

## 6. MTW Homeownership Program

### a) Operation of a Combined Public Housing and Housing Choice Voucher Homeownership Program

#### i. Plan Year Approved, Implemented, and Amended:

- **FY 2007:** Approved and implemented (operation of combined program)
- **FY 2010:** Other elements approved and implemented
- **FY 2014:** Expansion of eligibility to person eligible for LIPH
- **FY 2020:** Revised program manual

#### Authorization

Attachment C (B)(1) and (D)(8)

Attachment D (B)(4)

#### Regulatory Citation

24 CFR 982.625

- ii. **Description:** The HACP operates a single Homeownership Program open to both the LIPH and HCV Programs households. This approach reduces administrative costs, expands housing choices for participating households, and provides incentives for families to pursue employment and self-sufficiency through the various benefits offered. By combining the programs, increased benefits are available to some families.
- iii. **Activity Status:** Due to recent staff changes, the HACP Homeownership Program was restructured in FY 2021. However, it will continue to operate as a combined LIPH and HCV program and will not undergo any significant changes for FY 2023. In FY 2022, the HACP implemented a standard application process including a standardized income gathering method that will ensure consistency and efficiency thus improving the processing time. The HACP also implemented in a standardized data storage system that will ensure easy retrieval and tracking of information
- iv. **Planned Non-Significant Changes:** None; however, the HACP Asset Management staff continues to enhance the process in general.
- v. **Planned Changes to Metrics/Data Collection:** Although the HACP plans to use the same metrics as previous plan years and based on current market conditions, it is proposing to revise the benchmark goals as follows:

Cost Effectiveness					
Metric Name & #	Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings	Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).  \$380.00 (\$19/hr.)	Expected cost of task after implementation of the activity (in dollars).  \$764	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.

<b>CE #2: Staff Time Savings</b>	Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours). 20	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours). 25	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
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<i>Housing Choice</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>HC #5: Increase in Resident Mobility</b>	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 (number). 0	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number). 25	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>HC #6: Increase In Homeownership Opportunities</b>	Number of households that purchased a home as a result of the activity (increase).	Number of households that purchased a home prior to implementation of the activity (number). 0	Expected number of households that purchased a home after implementation of the activity (number). 25	Actual number of households that purchased a home after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>HC #7: Households Assisted by Services that Increase Housing Choice</b>	Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). 0	Expected number of households receiving these services after implementation of the activity (number). 25	Actual number of households receiving these services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<i>HACP Metrics</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>Closings / Purchase</b>	Number of closing/purchases as a result of the activity (increase).	Closings/purchases prior to implementation of the activity (number). 0	Expected closings/purchases after implementation of the activity (number). 15 (HCV) 10 (LIPH)	Actual closings/purchases (number).	Whether the outcome meets or exceeds the benchmark.

<b>Applicants Completing Course &amp; First Pre-approval</b>	Number of applicants completing course & first mortgage pre-approval (increase).	Applicants completing course & first mortgage pre-approval prior to implementation of the activity (number). 0	Expected applicants completing course & first mortgage pre-approval after implementation of the activity (number). 20 (HCV) 5 (LIPH)	Actual applicants completing course & first mortgage pre-approval after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>Total HACP Closing Funds</b>	Total dollar amount of HACP closing funds (increase)	HACP closing fund amount prior to implementation of the activity (in dollars) \$0	Expected HACP closing fund amount after to implementation of the activity (in dollars) \$140,000 (HCV) \$35,000 (LIPH)	Actual HACP closing fund amount (in dollars)	Whether the outcome meets or exceeds the benchmark.
<b>Average HACP Second Mortgage Amount</b>	Total average HACP second mortgage dollar amount (increase)	Average HACP second mortgage amount prior to implementation of the activity (in dollars) \$0	Expected average HACP second mortgage amount after to implementation of the activity (in dollars) \$12,875 (HCV) \$12,875 (LIPH)	Actual HACP second mortgage amount (in dollars)	Whether the outcome meets or exceeds the benchmark.
<b>Average Purchase Price</b>	Total average purchase price dollar amount (increase)	Average purchase price amount prior to implementation of the activity (in dollars) 0	Expected average purchase price after to implementation of the activity (in dollars) \$165,000 (HCV) \$165,000 (LIPH)	Actual average purchase price amount (in dollars)	Whether the outcome meets or exceeds the benchmark.
<b>Amount of non-HACP Assistance</b>	Total amount of non-HACP assistance dollar amount (increase)	Total non-HACP assistance amount prior to implementation of the activity (in dollars) \$0	Expected non-HACP assistance after to implementation of the activity (in dollars) \$115,500 (HCV) \$0 (LIPH) \$319,800 (Non-resident)	Actual non-HACP assistance amount (in dollars)	Whether the outcome meets or exceeds the benchmark.
<b>Foreclosures</b>	Total number of foreclosures (decrease)	Total foreclosures prior to implementation of the activity (number) 0	Expected foreclosures after to implementation of the activity (number) 0 (HCV) 0 (LIPH)	Actual foreclosures amount (number)	Whether the outcome meets or exceeds the benchmark.

**vi. Planned Significant Changes:** None.

- b) **Homeownership Assistance to include soft-second mortgage assistance coupled with closing cost assistance, homeownership and credit counseling, foreclosure prevention only; expanded eligibility to persons on the LIPH and HCV program waiting list and persons eligible; and establish a Homeownership Soft-Second mortgage waiting list.**

i. **Plan Year Approved, Implemented, and Amended:**

- **FY 2010:** Other elements approved and implemented
- **FY 2014:** Expansion of eligibility to person eligible for LIPH
- **FY 2020:** Revised Program Manual

**Authorization**

Attachment C (B)(1) and (D)(8)  
Attachment D (B)(4)

**Regulatory Citation**

24 CFR 982.643

ii. **Description:** The provisions of the HACP homeownership program are as follows:

- a. Provide soft-second mortgage financing for home purchases to eligible participants, calculated as follows: eligible monthly rental assistance x 12 months x 10 years, but in no case shall exceed \$52,000. The second mortgage is forgiven on a prorated basis over a ten-year period.
- b. Expand Homeownership Program eligibility to include persons on the HACP's LIPH and HCV waiting lists who have received a letter of eligibility for those programs from the HACP or persons otherwise eligible but currently not on a wait list.
- c. Establish a Homeownership Waiting List to assist in determining the order of eligibility for second mortgage Homeownership benefits.

iii. **Activity Status:** This part of the approved MTW activity was paused in FY 2021 to restructure programmatic procedures. In June 2022, the program relaunched and the HACP is actively working with potential buyers.

iv. **Planned Non-Significant Changes:** None; although the HACP plans to continue to implement and make more efficient an application process that will include a standard application that requests all required information up front.

v. **Planned Changes to Metrics/Data Collection:** Although the HACP plans to use the same metrics as previous plan years and based on current market conditions, it is proposing to revise the benchmark goals as follows:

<i>Self-Sufficiency</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>SS #8: Households Transitioned to Self Sufficiency</b>	Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency (a household's ability to maintain financial, housing, and personal/family stability) prior to implementation of the activity (number). This number may be zero. 1	Expected households transitioned to self-sufficiency (a household's ability to maintain financial, housing, and personal/family stability) after implementation of the activity (number). 10	Actual households transitioned to self-sufficiency (a household's ability to maintain financial, housing, and personal/family stability) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<i>Housing Choice</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>HC #6: Increase in Homeownership Opportunities</b>	Number of households that purchased a home as a result of the activity (increase).	Number of households that purchased a home prior to implementation of the activity (number). This number may be zero. 0	Expected number of households that purchased a home after implementation of the activity (number). 25	Actual number of households that purchased a home after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>HC #7: Households Assisted by Services that Increase Housing Choice</b>	Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero. 0	Expected number of households receiving these services after implementation of the activity (number). 25	Actual number of households receiving these services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

**vi. Planned Significant Changes:** None.

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## 7. Modified Housing Choice Voucher Program policy on maximum percent of Adjusted Monthly Income permitted

### i. **Plan Year Approved, Implemented, and Amended:**

- **FY 2001:** Approved and implemented
- No amendments since initial HUD-approval.

#### **Authorization**

Attachment C (D)(2)(a)

Attachment D (D)(1)(b)

#### **Regulatory Citation**

24 CFR 982.508

- ii. **Description:** The HACP's operation of the HCV Program allows flexibility in the permitted rent burden (affordability) for new tenancies. Specifically, the limit of 40% of Adjusted Monthly Income allowed for the tenant portion of rent is used as a guideline, not a requirement. The HACP continues to counsel families on the dangers of becoming overly rent burdened, however, a higher rent burden may be acceptable in some cases. This policy increases housing choice for participating families by giving them the option to take on additional rent burden for units in more costly neighborhoods.
- iii. **Activity Status:** The HACP continues to offer rent burden letters for new lease-ups while counseling the family on the dangers of becoming overly rent burdened. When possible, the HACP also renegotiates the contract rent amount with the owner to increase affordability and help prevent the family from becoming overly rent burdened.

The HACP is considering placing a cap on the total rent burden percentage for which the family may qualify. To determine a cap that does not overly restrict housing choice, the HACP is studying the effects of this implemented activity on the HCV families who utilize it. Based on the results of these studies, the HACP will report on any changes to this activity in a future MTW Annual Plan.

In fall 2021, the HACP received HUD Special Purpose Voucher waiver approval to utilize this implemented activity for its Emergency Housing Voucher and Mobility Demonstration Voucher programs.

### iv. **Planned Non-Significant Changes:** None.

- v. **Planned Changes to Metrics/Data Collection:** None. Please see the metrics that the HACP intends to continue to use for this activity as follows:



<i>Cost Effectiveness</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>HC #1: Additional Units of Housing Made Available</b>	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number).  0	Expected housing units of this type after implementation of the activity (number).  60	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>HC #5: Increase in Resident Mobility</b>	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 (number).  0	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).  60	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

**vi. Planned Significant Changes:** None.

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## 8. Modified Payment Standard Approval

### i. Plan Year Approved, Implemented, and Amended:

- **FY 2004:** Approved and implemented
- **FY 2013:** Amended to include UFAS and project-based voucher units as eligible for the modified payment standard.
- **FY 2022:** Amended to update for the HUD Community Choice Demonstration

#### Authorization

Attachment C (D)(2)(a)

#### Regulatory Citation

24 CFR 982.503

- ii. **Description:** In FY 2022, the HACP received HUD approval to modify the Reasonable Accommodations and Rehabilitation Voucher Payment Standard to align with the HUD Community Choice Demonstration changes to the regular payment standard. The goals of these changes are to increase housing choice, and to attract more landlords to rent to voucher holders with disabilities. For purposes of improving the readability of the MTW Plan and in light of the FY 2022 amendments, the HACP is reorganizing the approved MTW activities by removing the Rehabilitation Voucher Payment Standard language from Activity #10 and integrating it into Activity #8. All other aspects of the Rehabilitation Voucher Payment Standard remain unchanged.

### Reasonable Accommodation Voucher Payment Standard

The HACP is authorized to establish Exception Payment Standards up to 120% of FMR (Fair Market Rent) without prior HUD approval. From FY 2004-2013, the HACP has utilized this authority to establish an Exception Payment Standard at 120% of FMR as a Reasonable Accommodation for a person with disabilities. In FY 2013, the HACP received approval for a modification to this activity allowing the HACP to establish an Exception Payment Standard of up to 120% of FMR for fully Accessible Units meeting the Requirements of the Uniform Federal Accessibility Standard (UFAS). This Exception Payment Standard was available to tenants requiring the features of a UFAS unit and who locate such a unit on the open market; and may be used by the HACP in the Project-Based Voucher Program or other rehabilitation or new construction initiatives that create additional fully accessible UFAS units.

Historically, people with disabilities have an even harder time than their HCV counterparts in finding affordable and accessible housing to meet their disability-related needs. As a result, the HUD-approved FY 2022 modifications to this activity include a methodology that will boost any tiered payment standard amount by 10% of HUD's hypothetical Allegheny County Fair Market Rent (ACFMR) for any HCV family approved for a reasonable accommodation for a higher payment standard as follows:

Tier Number	Percent of ACFMR	Adjusted Percent of ACMR (for Reasonable Accommodations)
1	160%	170%
2	150%	160%
3	140%	150%
4	130%	140%
5	120%	130%
6	110%	120%

The unit's census tract location will determine the applicable payment standard tier in which the 10 percent increase will be applied. This Reasonable Accommodations Payment Standard will be available to all current voucher holders and new admissions to the Housing Choice Voucher (HCV) Program.

There are two (2) criteria for a family to receive these modified payment standards to include:

1. The family must be approved for a change to the payment standard through the reasonable accommodation process and/or submit evidence that the unit is fully wheelchair accessible, or has a minimum of at least four (4) accessible features that are needed by the prospective voucher holder, which would need to be verified by their Third Party Professional.
2. The unit must be inspected to confirm the required accessible features as outlined in the reasonable accommodations' approval letter are present.

The Reasonable Accommodations Payment Standards are available to PBV families approved through the reasonable accommodation and/or accessible feature process. The PBV rent calculation method will remain unchanged in accordance with 24 CFR 983.301(b) as the lowest of the payment standard minus the utility allowance, the reasonable rent, or the rent requested by the owner rent.

### **Rehabilitation Voucher Payment Standard**

The goal of this option is to incentivize landlords to rehabilitate substandard units that otherwise would not be able to be on the HCV program thereby increasing the affordable housing stock. Qualified units can receive an additional 10% of a unit's tiered percentage amount. For example, if a unit's census tract location is in Tier 5, the approved payment standard percentage will change from 120% to 130% of ACFMR. This payment option is neither indefinite nor for one (1) time use but rather remains available to the landlord should the approved unit change voucher holders.

### Eligibility Requirements

The Rehabilitation Voucher Payment Standard will be available to all current voucher holders or new admissions to the Housing Choice Voucher (HCV) program. Participants that are elderly, disabled or currently employed and possess a minimum of six (6) months of employment will receive preference for this option. However, this preference only applies to persons on the HCV wait list and not current voucher holders. If a participant is unemployed or becomes unemployed during their tenancy under this option they are immediately required to enroll in the Family Self Sufficiency (FSS) program.

For a unit to qualify for this option the property must meet at least one (1) of the following criteria:

- i. Undergo significant upgrades and/or investments that improve the quality of the unit as of January 1, 2019 or later. These include but are not limited to complete electrical, plumbing HVAC installation, roof replacement, and building envelope resurfacing. Green or energy efficient infrastructure is encouraged but at this time will not qualify as an approved investment due to lack of capacity. This will be assessed based upon the following standards:
  - a. System upgrades, and/or
  - b. Rehabilitation of previously substandard units, and/or
  - c. Renovation (investments of \$ 6,000 or more per unit for labor and/or materials)
- ii. The unit passes the International Property Maintenance Code inspection standard.
- iii. Units built to be affordable under any Inclusionary Zoning (IZ) policy determined by the Department of City Planning. The City of Pittsburgh's Inclusionary Zoning (IZ) policy is a tool to incentivize and encourage developers to build new affordable housing in neighborhoods that have priced out low-income renters. The current IZ policy is only applicable to the Lawrenceville neighborhood which has seen rapid increases in market unit prices.

**Note:** Low-income Housing Tax Credit (LIHTC) units are ineligible for this payment standard during the initial fifteen (15) year affordability period. Following the initial affordability period, units in LIHTC developments qualify for the rehabilitation payment standard if they meet the eligibility requirements. Substantial rehabilitation or modernization under \$6,000 may be eligible for this standard dependent upon review, on a case-by-case basis.

### Owner Documentation & Verification Requirements

The type and nature of the upgrades and/or investments will constitute the specific types of documentation that the HACP will require to determine if the unit qualifies for the rehabilitation payment standard. However, the HACP will generally require the following:

- i. The owner/landlord will submit copies of all construction and/or rehabilitation invoices, plans, etc. to the HACP Landlord Outreach and Support Coordinator or Inspections Department with the Request for Tenancy Approval (RFTA).
- ii. The proper inspection type/verification must be requested at the same time by the owner/landlord to include:
  - a. International Property Maintenance Code inspection
  - b. Request for the HACP to review with the Department of City Planning to confirm eligibility of any units built to be affordable under any inclusionary zoning policy
- iii. The HACP or designated third party will then verify the completed work and deem the property owner eligible to receive the rehabilitation payment standard.

If the modifications to this activity do not yield the anticipated benefit(s) to the HACP participants, the HACP will revise this payment standard methodology in the FY 2024 or subsequent MTW Annual Plan submission or submit a MTW Annual Plan amendment for review and approval. Lastly, it should be noted that in the event of a conflict between the Community Choice Demonstration and the flexibilities in the current MTW Plan, the Community Choice Demonstration statute, and Notice of Funding Availability (NOFA) will govern.

- iii. **Activity Status:** In FY 2022, the HACP received HUD approval to modify the Reasonable Accommodations and Rehabilitation Payment Standards to align with the HUD Community Choice Demonstration and other changes to the HACP regular payment standard. Implementation of these changes began in Quarter 4 of FY 2022 and will continue into FY 2023.
- i. **Planned Non-Significant Changes:** The HACP submitted a HUD waiver approval as described in PIH Notice 2021-15 in July 2022 to apply the newly approved tiered payment standard changes and additional 10% FMR incentive to its Emergency Housing Voucher (EHV) Program. The HACP also submitted a separate waiver in September 2021 to the HUD Pittsburgh-Buffalo Field Office to utilize the former Rehabilitation and Mobility Payment Standards for each of its other Special Purpose Voucher programs (except for Mobility Demonstration Vouchers for which approval was already granted). The HACP anticipates that it will resubmit the Special Purpose Voucher waiver request to reflect the newly approved modifications to this activity in late FY 2022 or FY 2023. Any subsequent approved changes to any of the Special Purpose Voucher payment standards will be included in the next applicable MTW Plan.

- iv. **Planned Changes to Metrics/Data Collection:** The HACP is proposing to remove the metrics listed below as these outcomes are not available to track in the software used, Emphasys Elite, or these metrics are not applicable to this activity.

<i>Housing Choice</i>					
<b>HC #3: Decrease in Wait List Time</b>	Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months). 0	Expected average applicant time on wait list after implementation of the activity (in months). 25	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
<b>HC #4: Displacement Prevention</b>	Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	Households losing assistance/moving prior to implementation of the activity (number). 0	Expected households losing assistance/moving after implementation of the activity (number). 25	Actual households losing assistance/moving after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<i>HACP Metrics</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>New Housing Units Made Available (New Construction)</b>	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). 0	Expected housing units of this type after implementation of the activity (number). 7	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

Please see the below-listed metrics that the HACP intends to continue to use for this activity. The HACP is also proposing to add one (1) metrics from Activity #10 (with slightly different benchmark numbers) that most likely will be beneficial to track for this activity.

<i>Housing Choice</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>HC #1: Additional Units of Housing Made Available</b>	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). 0	Expected housing units of this type after implementation of the activity (number). 25	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<b>HC #2: Units of Housing Preserved</b>	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Housing units preserved prior to implementation of the activity (number). 0	Expected housing units preserved after implementation of the activity (number). 25	Actual housing units preserved after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>HC #5: Increase in Resident Mobility</b>	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 (number). 0	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number). 25	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<i>HACP Specific Metrics</i>					
<b>Metric Name</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>New landlords attracted to HCV program</b>	Number of new landlords leasing units to HCV participants. That would otherwise not be available (increase).	Total number of new landlords prior to implementation of the activity (number). 0	Expected number of new landlords after implementation of the activity (number) 10	Actual number of new landlords enrolled after implementation of the activity	Whether the outcome meets or exceeds the benchmark.

**v. Planned Significant Changes:** None.



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## 9. Step Up to Market Financing Program - Use of Block Grant Funding Authority for Development, Redevelopment, and Modernization

### i. Plan Year Approved, Implemented, and Amended

- **FY 2012-2013:** Approved and implemented
- **FY 2017:** Amended to include additional features.

#### Authorization

Attachment C (B)(1)

Attachment C (C)(12-16)

Attachment C (D)(7)

#### Regulatory Citation

24 CFR 982 and 990

24 CFR 941.202 & 203

24 CFR 983

24 CFR 941.306

24 CFR 941.401

- ii. **Description:** The HACP will expand its use of the Block Grant authority authorized in the MTW Agreement to leverage debt to fund public housing redevelopment and modernization and affordable housing development and preservation. The goal is to address additional distressed properties in the HACP's housing stock prior to the end of the current MTW agreement expiring in FY 2028 and increase the variety and quality of available affordable housing in the City of Pittsburgh. Specifically, the HACP will identify properties for participation in the Step Up To Market Program and subsequent other local, non-traditional development, redevelopment, and modernization strategies to include, Gap Financing, PBVs, and RAD conversion. The HACP will utilize one (1) or more of the referenced strategies, subject to any required HUD approvals, to achieve its development, modernization, and redevelopment goals. This broad list of authorities, including but not limited to, the following, have been generally approved but must be specifically identified for each planned project in future submissions:

- a. Project-basing HACP units without competitive process.
- b. Determining a percentage of units that may be project-based at a development up to 100% of units and permitting the initiation of site work prior to execution of the Agreement to Enter Into a Housing Assistance Payments (AHAP) Contract.
- c. Project basing units at levels not to exceed 150% of the FMR as needed to ensure viability of identified redevelopment projects. Actual subsidy levels will be determined on a property-by-property basis and will be subject to a rent reasonableness evaluation for the selected site, and a subsidy layering review by HUD. When units are HACP-owned, the rent reasonableness evaluation will be conducted by an independent third party.

- d. Project basing certain RAD PBV units up to 110% of Small Area Fair Market Rent (SAFMR) if the owner proposes to set RAD rent at SAFMR unless the 110% of SAFMR exceeds RAD rent level allowed by HUD.
- e. Project basing certain units up to 110% of Small Area Fair Market Rent (SAFMR) if the units are located in a mixed-finance development that is owned wholly or partially by HACP, ARMDC or their subsidiaries.
- f. Extending eligibility for project-based units to families with incomes up to 80% of AMI.
- g. Establishing criteria for expending funds for physical improvements on PBV units that differ from the requirements currently mandated in the 1937 Act and implementing regulations. Any such alternate criteria will be included in an MTW Plan or Amendment submission for approval prior to implementation.
- h. Establishing income-targeting goals for the PBV program, and/or for specific project-based voucher developments, which have a goal of promoting a broad range of incomes in project based developments.
- i. Other actions as determined to be necessary to fund development and/or modernization subject to any required HUD approvals, including, but not limited to, combining financial investments permitted under Section 9 of the Act with PBV Assistance permitted under Section 8 of the act, as identified in this section. The HACP will follow HUD protocol and submit mixed- finance development proposals to HUD for review and approval.
- j. Acquisition of property without prior HUD approval as needed to take advantage of opportunities as they arise, with specific focus on parcels needed for site assembly for redevelopment and development projects. The HACP will ensure that all HUD site acquisition requirements are met.

### **Specific Strategies and Properties:**

The HACP and its partners have identified the following strategies that will leverage Low-income Housing Tax Credits (LIHTC) and capital contributions by the HACP in order to complete the financing necessary for:

- Addison Terrace Redevelopment Phases I, II, III, and IV
- Allegheny Dwellings Redevelopment Phase I and subsequent phases
- Larimer/ East Liberty Redevelopment Phase I, III, and IV
- Bedford Dwellings Redevelopment Phase I and subsequent phases
- Oak Hill Phase II
- Manchester Redevelopment (RAD)

- Scattered Site preservation or conversion project
  - Northview Heights Midrise
  - City's Edge Residential Development
  - Projects identified through the PBV and Gap Financing Program
  - VASH PBV projects, either self-development or co-development
1. Project-basing the HACP units without competitive process (As authorized under Attachment C. Section B. Part 1. b. vi. and Part 1. c.; Attachment C. Section D. 7. a.. authorizing the HACP “to project-base Housing Choice Voucher assistance at properties owned directly or indirectly by the agency that are not public housing, subject to HUD’s requirement regarding subsidy layering.”).
  2. Determining a percentage of units that may be project based at a development, up to 100% of units and permitting the initiation of site work prior to execution of the Agreement to Enter into a Housing Assistance Payments (AHAP) Contract. (As authorized under Attachment C. Section B. Part 1. b. vi. (authorizing the provision of HCV assistance or project-based assistance alone or in conjunction with other private or public sources of assistance) and vii. (authorizing the use of MTW funds for the development of new units for people of low- income) and Part 1. c. (authorizing these activities to be carried out by the Agency, or by an entity, agent, instrumentality of the agency or a partnership, grantee, contractor or other appropriate party or entity); Attachment C. Section D. 7. c. (authorizing the agency to adopt a reasonable policy for project basing Housing Choice Voucher assistance) and Attachment D. Section D. 1.c. (authorizing the HACP to determine property eligibility criteria).
  3. Extending Eligibility for project-based units to families with incomes up to 80% of AMI. (As authorized under Attachment C. Section B. Part 1. b. vi. and Part 1. c.; Attachment C. Section D. 7. (authorizing the agency to establish a project-based voucher program) and Attachment D. Section D. 1. a. (authorizing the agency to determine reasonable contract rents.).
  4. Acquisition of property without prior HUD approval in order to complete site assembly for these projects. As authorized under Attachment C. Section C. 13. (authorizing the acquisition of sites without prior HUD approval). Site work for acquired properties will begin upon completion of environmental review and/or any required development approvals when necessary.

5. Combining PBV commitments with LIHTC and/or HACP capital investments and/or other financial resources to support the development, rehabilitation, or preservation of affordable housing units, as authorized under Attachment C., Section B. 1. b. (authorizing the use of MTW funds for any eligible activity under Section 9(d)(1), 9(e)(1) and Section 8(0) of the 1937 Act), and Attachment D. Section B. 1. (authorizing the acquisition, new construction, reconstruction or moderate or substantial rehabilitation of housing which may include financing and other related activities.)

The HACP will submit a full development proposal, including Rental Term Sheet, Pro Formas, Sources and Uses, schedules, and other detailed project information or local Non-traditional activity proposals as required based on each project's financing to HUD's Office of Public Housing Investments or other HUD office as directed for approval as part of the mixed finance approval process as per HUD's protocol, and will ensure completion of a subsidy layering review as required.

#### **Local Non-Traditional Development: Development, rehabilitation, and/or preservation through the PBV and Gap Financing Program**

In response to the growing demand for affordable housing, the HACP developed the PBV/Gap Financing tool. Using this financing tool, the HACP, through its instrumentality ARMDC, can provide gap funding (soft or hard debts) attached to PBV units. Funds are awarded through a competitive request for proposal process among developers/owners committed to the creation of additional affordable units within the city. In FY 2021, the HACP will continue to work with previous year's PBV/Gap Financing awardees and will issue RFPs subject to budget availability. This initiative combines authorizations permitted under Section 8 PBV and Section 9 (capital investments). The investment will spur the development, rehabilitation, or preservation of high-quality affordable housing units by leveraging a spectrum of public and private investments. This approach maximizes the impact of existing available resources, incentivizes leveraging of other public and private financial resources, and supports the completion of projects at a lower cost to the HACP than is possible through other mixed-finance strategies employed by the HACP/ARMDC's co-developers or ARMDC's self-development team. Collaborating with various development teams and project owners, the PBV/Gap Financing program will support more housing choices throughout the city.

With the submission of the FY 2019 MTW Annual Plan, the HACP made one (1) non-significant change to this section, adding the specific provision "permitting the initiation of site work prior to Execution of the Agreement to Enter Into a Housing Assistance Payments (AHAP) Contract" into the description of this initiative, and into the specific authorizations section, in conjunction with the authorization to project base up to 100% of the units in a development. This change assisted with streamlining the processes and expediting completion of replacement developments.

Two other changes were approved in the FY 2022 MTW Annual Plan to include project basing certain RAD PBV units up to 110% of Small Area Fair Market Rent (SAFMR) if the owner proposes to set RAD rent at SAFMR unless the 110% of SAFMR exceeds RAD rent level allowed by HUD. Also, the HACP plans to project base certain units up to 110% of Small Area Fair Market Rent (SAFMR) if the units are located in a mixed-finance development that is owned wholly or partially by HACP, ARMDC or their subsidiaries.

- iii. Activity Status:** The HACP and the ARMDC have utilized these MTW development tools to develop and preserve affordable housing units in mixed-income communities throughout the city of Pittsburgh as follows:

Development	Development Type	Year Completed	# of Housing Units	Income Mix (PH=Public Housing, LIHTC=Tax Credit, Mkt=Market Rate)
Addison Terrace Redevelopment Phase I	Non-Traditional Mixed-finance	2015	186	149 PBV, 19 LIHTC, 18 Mkt
Addison Terrace Redevelopment Phase II	Non-Traditional Mixed-finance	2016	90	64 PBV, 26 Mkt
Addison Terrace Redevelopment Phase III	Non-Traditional Mixed-finance	2017	52	37 PBV, 15 Mkt
Addison Terrace Redevelopment Phase IV	Non-Traditional Mixed-finance	2019	48	42 PBV, 16 Mkt
Larimer/East Liberty Phase I (Choice)	Non-Traditional Mixed-finance	2016	85	28 PBV, 28 LIHTC, 29 Mkt
Larimer/East Liberty Phase II (Choice)	Non-Traditional Mixed-finance	2019	150	75 PBV, 33 LIHTC, 42 Mkt
Oak Hill RAD PBRA Conversion	RAD conversion to PBRA	2017	395	395 PBRA
Allegheny Dwellings Redevelopment Phase I	Non-Traditional Mixed-finance	2019	65	47 PBV, 18 Mkt
Miller Street	PBV/Gap Financing	2019	36	9 PBV, 27 LIHTC
Larimer/East Liberty Turnkey Scattered Sites (Choice)	Turnkey development	2020	12	12 PH
Elmer Williams Square	PBV/Gap Financing	2020	37	37 PBV
Crawford Square	PBV/Gap Financing	2020	347	60 PBV, 134 LIHTC, 153 Mkt
Glen Hazel - RAD	RAD conversion to PBRA	2020	225	209 PBRA, 16 Mkt
Lemington Senior Apartment	PBV/Gap Financing	2021	54	54 PBV/LIHTC
Harvard Beatty	PBV/Gap Financing	2022 (under construction)	42	8 PBV, 34 LIHTC
Larimer/East Liberty Phase III (Choice)	Non-Traditional Mixed-finance	2022 (under construction)	42	19 PBV, 14 LIHTC, 9 Mkt
Larimer/East Liberty Phase IV (Choice)	Non-Traditional Mixed-finance, Under construction.	2022 (under construction)	42	18 PBV, 17 LIHTC, 7 Mkt
New Granada Apartment	PBV/Gap Financing	2022 (under construction)	40	10 PBV, 30LIHTC
North Negley Residence	PBV/Gap Financing	2022 (under construction)	45	13 PBV, 32LIHTC
Gladstone	PBV/Gap Financing	2023 (estimated)	53	20 PBV, 23 LIHTC, 8 Mkt
Manchester Redevelopment	RAD conversion to PBV Predevelopment stage	2023 (estimated)	86	86 PBV
Northview Midrise	Mixed finance. Predevelopment stage	2023 (estimated)	43	43 PH/LIHTC
Larimer/East Liberty Turnkey Scattered Sites (Choice)	Turnkey development	2023 (estimated)	3	3 LIPH
			<b>2,178</b>	<b>58 LIPH, 1380 PBV/PBRA, 357 Mkt, 391 LIHTC-only</b>

iv. **Planned Non-Significant Changes:** None.

v. **Planned Changes to Metrics/Data Collection:** The HACP is proposing to remove one metric as this activity is not connected to the creation of homeownership units in and of itself.

<i>Housing Choice</i>					
<b>HC #6: Increase in Homeownership Opportunities</b>	Number of households that purchased a home as a result of the activity (increase).	Number of households that purchased a home prior to implementation of the activity (number). 0	Expected number of households that purchased a home after implementation of the activity (number). 100	Actual number of households that purchased a home after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

Please see the metrics that the HACP intends to continue to use for this activity as follows:

<i>Housing Choice</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>HC #1: Additional Units of Housing Made Available</b>	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Housing units of this type prior to implementation of the activity (number). 0	Expected housing units of this type after implementation of the activity (number). 100	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>HC #5: Increase in Resident Mobility</b>	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 (number). 0	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number). 100	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

vi. **Planned Significant Changes:** None.



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## 10. Local Payment Standards-Housing Choice Voucher Program

### i. Plan Year Approved, Implemented, and Amended:

- **FY 2019:** Approved and implemented
- **FY 2022:** Amended to update for the HUD Community Choice Demonstration

#### Authorization

#### Regulatory Citation

Attachment C (D)(2)(a)

24 CFR 982.503

Attachment C (D)(3)(a)

24 CFR 982.507

Attachment C (D)(4)

24 CFR 982 Subpart E

24 CFR 983 Subpart F

- ii. **Description:** From FY 2019-2022, the HACP had HUD approval for two local (also known as alternative) payment standards under this activity known as Rehabilitation and Mobility. However, the HACP noticed that few landlords utilized these alternative payment standards through its MTW metric tracking. Through a detailed local rental market analysis driven by the HUD Community Choice Demonstration in FY 2022, the HACP decided to simplify its payment standards across the entire HCV Program and eliminate the Mobility Payment Standard and its scorecard criteria. The HACP is surmising that the tiered methodology will allow more landlords to access higher payment standards that align closer with the hyper-local rental market fluctuation while simplifying the criteria to determine a unit's applicable payment standard.

Using recent American Community Survey (ACS) five (5)-year estimates, census tracts in Allegheny County were sorted into one of seven (7) payment standard tiers based on how far above, at, or below their all-bedroom Median Gross Rent (MGR) fell from Allegheny County's all-bedroom Median Gross Rent. Tracts were then set a given percentage above, at or below the HUD hypothetical Allegheny County Fair Market Rent (ACFMR) based on which payment standard tier they were sorted into. Census tracts (regardless of opportunity status) under the HACP's jurisdiction were set to be no lower than Tier 6 (110% of ACFMR) and all of the existing opportunity zones under the former Mobility Payment Standards were built into Tier 1 (160% of ACFMR).

The tier breakdown is as follows:

<b>Tier</b>	<b>Sort Condition (tract MGR/County MGR)</b>	<b>Percent above ACFMR</b>	<b>Number of HACP Tracts/Tier</b>	<b>Percent of HACP Tracts/Tier</b>
7	>= .91, <= 1 of AC MGR	100%	0	0%
6	>= 1.01, <= 1.1 of AC MGR	110%	91	66%
5	>= 1.11, <= 1.2 of AC MGR	120%	10	7%
4	>= 1.21, <= 1.3 of AC MGR	130%	12	9%
3	>= 1.31, <= 1.4 of AC MGR	140%	3	2%
2	>= 1.41, <= 1.5 of AC MGR	150%	2	1%
1	>= 1.51 of AC MGR	160%	19	14%

This payment standard will be available to all current voucher holders and new admissions to the Housing Choice Voucher (HCV) program regardless of their participation in the Community Choice Demonstration. The only criterion to determine which tier the unit will fall under is the unit's census tract location.

For ease of use, the HACP, DHS, and ACHA are creating a public-facing GIS map whereby anyone can type in a unit address and receive accurate payment standard information. The map will at minimum state the jurisdiction and payment standard tier for each census tract in Allegheny County, however, will be developed with HUD, First PIC and ABT Associates' guidance.

- iii. **Activity Status:** The HACP plans to implement the new local payment standard to the tenant-based HCV program in Quarter 4 of 2022 and continue administration of this repurposed activity through FY 2023. Furthermore, the HACP will continue to request additional waivers as new Special Purpose Voucher programs emerge in FY 2023 and beyond.
- iv. **Planned Non-Significant Changes:** The HACP submitted a HUD waiver approval as described in PIH Notice 2021-15 in July 2022 to apply the newly approved, tiered payment standard changes and additional 10% FMR incentive to its Emergency Housing Voucher (EHV) Program. The HACP also submitted a separate waiver in September 2021 to the HUD Pittsburgh Field Office to utilize the former Rehabilitation and Mobility Payment Standards for each of its other Special Purpose Voucher programs (except for Mobility Demonstration Vouchers for which approval was already granted). The HACP anticipates that it will resubmit the Special Purpose Voucher waiver request to reflect the newly approved modifications to this activity in late FY 2022 or FY 2023. Any subsequent approved changes to any of the Special Purpose Voucher payment standards will be included in the next applicable MTW Plan.

- v. **Planned Changes to Metrics/Data Collection:** Since the HACP repurposed this activity; the HACP is also proposing to reset the benchmark figures to align with the activity's modifications. Please see the metrics that the HACP intends to continue to use for this activity as follows:

<i>Housing Choice</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>HC #2: Units of Housing Preserved</b>	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Housing units preserved prior to implementation of the activity (number). 0	Expected housing units preserved after implementation of the activity (number). 400	Actual housing units preserved after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>HC #5: Increase in Resident Mobility</b>	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 (number). 0	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number). 50	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<i>Self Sufficiency</i>					
<b>Metric Name &amp; #</b>	<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>SS #5: Households Assisted by Services that Increase Self Sufficiency</b>	Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number). 0	Expected number of households receiving self-sufficiency services after implementation of the activity (number). 25	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

<i>HACP Specific Metrics</i>					
Metric Name	Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
New landlords attracted to HCV program	Number of new landlords leasing units to HCV participants. That would otherwise not be available (increase).	Total number of new landlords prior to implementation of the activity (number). 0	Expected number of new landlords after implementation of the activity (number) 10	Actual number of new landlords enrolled after implementation of the activity	Whether the outcome meets or exceeds the benchmark.

**vi. Planned Significant Changes:** None.

## B. Not Yet Implemented Activities

The HACP does not currently have any approved but not yet implemented activities.

## C. Activities On Hold

The HACP does not currently have any approved MTW activities on hold.

## D. Closed-Out Activities

Since entering the MTW Program in FY 2000, the HACP has also instituted a number of initiatives that no longer required specific MTW Authority. Some of those initiatives are:

### 1. Establishment of Site-Based Waiting Lists

#### i. Plan Year Approved, Implemented and Closed Out

- Approved and implemented before Standard Agreement was executed
- **FY 2006:** Closed out

#### ii. Close-Out Explanation

This activity was closed out prior to execution of the Standard Agreement, as MTW authority was no longer required for this activity.

### 2. Establishment of a Variety of Local Waiting List Preferences, including a working/elderly/disabled preference and a special working preference for scattered site units

#### i. Plan Year Approved, Implemented and Closed Out

- Approved and implemented before Standard Agreement was executed
- **FY 2008:** Closed out

#### ii. Close-Out Explanation

This activity was closed out prior to execution of the Standard Agreement, as MTW authority was no longer required for this activity.

### 3. Modified Rent Reasonableness Process

#### i. Plan Year Approved, Implemented and Closed Out

- Approved and implemented before Standard Agreement was executed
- **FY 2008:** Closed out

#### ii. Close-Out Explanation

This activity was closed out prior to execution of the Standard Agreement, as MTW authority was no longer required for this activity.

#### **4. Transition to Site-Based Management and Asset Management, including Site-Based Budgeting and Accounting**

##### **i. Plan Year Approved, Implemented and Closed Out**

- Approved and implemented before Standard Agreement was executed
- **FY 2005:** Closed out

##### **ii. Close-Out Explanation**

This activity was closed out prior to execution of the Standard Agreement, as MTW authority was no longer required for this activity.

#### **E. Other Activities**

Several activities that utilized MTW Authority but are not specified as specific initiatives waiving specific regulations were previously included in the initiative section but no longer require that separate listing. They are as follows:

##### **1. Use of Block Grant Funding Authority to Support MTW Initiatives - Block Grant Funding Authority supports Development and Redevelopment, Enhanced and Expanded Family Self-sufficiency and related programming, and the HACP MTW Homeownership Program.**

- a. Originally approved with the initial MTW Program and expanded to include homeownership and resident service programs in subsequent years, the HACP continues to use MTW block grant funding to support its MTW Initiatives. Additional information on the use of Single Fund block grant authority is included in other sections of this MTW Plan, particularly Section V. on Sources and Uses of funds.

##### **2. Energy Performance Contracting**

- a. Under the HACP's MTW Agreement, the HACP may enter into Energy Performance Contracts (EPC) without prior HUD approval. The HACP will continue its current EPC, executed in FY 2008, to reduce costs and improve the efficient use of federal funds.
- b. The HACP's current EPC included installation of water saving measures across the authority, installation of more energy efficient lighting throughout the authority, and installation of geo-thermal heating and cooling systems at select communities. It was completed in FY 2010, with final payments made in FY 2011. Monitoring and Verification work began in FY 2011, with the first full Monitoring and Verification report completed for the FY 2012 year. The HACP's objectives include realizing substantial energy cost savings. The HACP reports on the EPC in the MTW Annual Report.

### **3. Establishment of a Local Asset Management Program**

- a. In FY 2004, prior to HUD's adoption of a site-based asset management approach to public housing operation and management, the HACP embarked on a strategy to transition its centralized management to more decentralized site-based management capable of using an asset management approach. During the HACP's implementation, HUD adopted similar policies and requirements for all Housing Authorities. Specific elements of the HACP's Local Asset Management Program were approved in FY 2010, as described in the Appendix, Local Asset Management Program. The HACP will continue to develop and refine its Local Asset Management Program to reduce costs and increase effectiveness.

### **4. Acquisition of Property and Build-Out to be Utilized for Administrative Offices**

- a. The HACP along with its partners, the City of Pittsburgh, and the Urban Redevelopment Authority (URA), jointly purchased new office space located at 412 Boulevard of the Allies on September 20, 2018. The HACP intends to build-out the office space and relocate during FY 2021. The HACP plans to submit an application for disposition for its current offices in the John P. Robin Civic Building (200 Ross Street, Pittsburgh, PA 15219) in FY 2021.



## V. PLANNED APPLICATION OF MTW FUNDS

### A. PLANNED APPLICATION OF MTW FUNDS

#### i. Estimated Sources of MTW Funds:

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$8,050,810
70600	HUD PHA Operating Grants	\$151,846,794
70610	Capital Grants	\$0
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$33,794,624
71100+72000	Interest Income	\$0
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$1,663,280
70000	Total Revenue	\$195,355,508

#### ii. Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the Plan Year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year should be identified here; unspent funds that the MTW PHA is not planning on expending during the plan year **should not be** included in this section.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$36,842,271
91300+91310+92000	Management Fee Expense	\$13,412,786
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$8,957,474
93000 (93100+93200+93300+93400+93600+93800)	Total Utilities	\$7,420,463
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$24,514,144
95000 (95100+95200+95300+95500)	Total Protective Services	\$7,404,977
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$1,645,500
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$5,425,907
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$27,527,858
97300+97350	HAP + HAP Portability-In	\$45,149,158
97400	Depreciation Expense	\$0
97500+97600+97700+97800	All Other Expense	\$17,054,970
90000	Total Expenses	\$195,355,508

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

N/A

### iii. Description of Planned Application of MTW Single Fund Flexibility

MTW agencies have the flexibility to apply fungibility across three core funding programs' funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – hereinafter referred to as “MTW Funding.” The MTW PHA shall provide a thorough narrative of planned activities it plans to undertake using its unspent MTW Funding. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

PLANNED APPLICATION OF MTW SINGLE FUND FLEXIBILITY
<b>Description</b> The HACP plans to utilize its single fund flexibility to direct \$20,250,794 in 2023 from the HCVP and Low-Income Public Housing Program funding to support the HACP Development Program, Modernization Program, Resident Services, and Protective Services.

HACP will continue the use of single fund flexibility as approved in prior years for the activities listed below:

<b><u>Activity</u></b>	<b><u>Plan Year Originally Obligated</u></b>	<b><u>Status</u></b>
Use of Block Grant Funding to support Enhance Family Self-Sufficiency Program	2004 Annual Plan	Ongoing
Use of Block Grant Funding to support development and redevelopment activities	2001 Annual Plan	Ongoing
Use of Block Grant Funding to support the HACP Homeownership Program	2002 Annual Plan with modifications in subsequent years	Ongoing

**B. PLANNED APPLICATION OF PHA UNSPENT OPERATING FUND AND HCV FUNDING**

Original Funding Source	Beginning of FY - Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$ 0	\$ 0
HCV Admin Fee	\$ 0	\$ 0
PH Operating Subsidy	\$ 80,584,446	\$ 80,584,446
<b>TOTAL:</b>	<b>\$ 80,584,446</b>	<b>\$ 80,584,446</b>

**Description of Planned Expenditures of Unspent Operating Fund and HCV Funding:**

**The planned expenditures of the unspent operating fund and HCV funding will be used on general operating costs along with development and modernization costs. Please see the above capital budgets and estimated application of MTW Funds for in depth detail.**

\* Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.

\*\* HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.

**C. LOCAL ASSET MANAGEMENT PLAN**

**i. Is the MTW PHA allocating costs within statute?**

No, the HACP is not allocating costs within statute

**ii. Is the MTW PHA implementing a local asset management plan (LAMP)?**

Yes

**iii. Has the MTW PHA provided a LAMP in the appendix?**

Yes

**iv. If the MTW PHA 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.**

The HACP does not plan to make any changes in the Plan Year.

**D. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION**

**i. Description of RAD Participation**

The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

**RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION**

- The HACP completed a RAD conversion for the Oak Hill mixed-income community and Glen Hazel public housing community in FY 2017 and FY 2018, respectively.
- The HACP plans to convert 86 public housing units in the Manchester neighborhood to the RAD PBV program in FY 2022 and FY2023. The Commitment for Housing Assistance Payment (CHAP) was received in May 2020. This project is also known as the Manchester Redevelopment. In July, 2022, RAD Financing Plan was submitted to HUD.
- FY2022 Annual Plan included HACP's new RAD PBV conversion plan, New Pennley Place RAD. HUD approved the CHAP for a 38-unit conversion for New Pennley Place RAD in March 2022. RAD Financing Plan will be submitted to HUD in FY2023

**ii. 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.**

No

**iii. 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 describes any proposed changes from the prior RAD Significant Amendment?**

The HACP did not submit a RAD Amendment in the Appendix.

## VI. ADMINISTRATIVE

### A. Board Resolution and Certifications of Compliance

The following documents are for the FY 2023 MTW Annual Plan Submission in October 2022. A copy of the HACP Board Resolution and certification adopting this FY 2023 MTW Annual Plan and a signed copy of the Certifications of Compliance are included with the FY 2023 MTW Annual Plan. The Board of Commissioners Meeting for the HACP was held on Thursday, September 22, 2022. Please see copies of the documents on the following pages.



## Housing Authority of the City of Pittsburgh

Executive Office  
200 Ross Street – 9<sup>th</sup> Floor  
Pittsburgh, PA 15219  
(412) 456-5012

### **CERTIFICATE OF RESOLUTION APPROVAL**

I, Amy L. Shaffer, Recording Secretary of the Housing Authority of the City of Pittsburgh, do hereby certify that the attached Resolution No. 53 was presented to the Board of Commissioners of the Housing Authority of the City of Pittsburgh at its meeting held on Thursday, September 22, 2022, was approved.

IN TESTIMONY, WHEREOF, I have hereunto set my hand and the seal of said Housing Authority of the City of Pittsburgh this 22nd Day of September 2022.

---

Recording Secretary (SEAL)



**RESOLUTION No. 53 of 2022**

**A Resolution - Approving the Housing Authority of the City of Pittsburgh FY 2023 Moving to Work Annual Plan, and authorizing the Executive Director or his Designee to submit the Annual Plan to the U.S. Department of Housing and Urban Development**

**WHEREAS**, on November 17, 2000, the Housing Authority of the City of Pittsburgh (HACP) and the United States Department of Housing and Urban Development (HUD) executed an agreement authorizing the HACP to participate in the Moving to Work (MTW) Demonstration; and

**WHEREAS**, as a participant in the MTW demonstration, the HACP is required to submit an Annual Plan for review and approval by HUD; and

**WHEREAS**, the HACP's Fiscal Year (FY) 2023 Moving To Work (MTW) Annual Plan was made available for public review and comment from Sunday, July 31, 2022 to Wednesday, September 14, 2022 on the HACP Web Site: [www.hacp.org](http://www.hacp.org), and public hearings were held on the proposed FY 2023 MTW Annual Plan on Thursday, September 15, 2022; and

**WHEREAS**, the HACP will consider all comments received regarding the FY 2023 MTW Annual Plan and report to the Board of Commissioners.

**NOW, THEREFORE, BE IT RESOLVED** by the Board of Commissioners of the Housing Authority of the City of Pittsburgh:

**Section 1.** The HACP's Fiscal Year (FY) 2023 Moving to Work (MTW) Annual Plan is approved and the Executive Director or his Designee is authorized to submit the plan to HUD; and

**Section 2.** The Certifications of Compliance, as required by HUD are hereby adopted and approved; and the Chairman is hereby authorized to sign the Certifications of Compliance on behalf of the Board.

**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 01/01/2023), 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.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

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

- (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.
- (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.

Housing Authority of the City of Pittsburgh

PA001

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).*

Valerie McDonald Roberts

HACP Board Chairperson

NAME OF AUTHORIZED OFFICIAL

TITLE


  
 Valerie McDonald Roberts (Sep 27, 2022 18:19 EDT)

Sep 27, 2022

SIGNATURE

DATE

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

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








# Certificate of Compliance

Final Audit Report

2022-09-27

Created:	2022-09-26
By:	Amy Shaffer (amy.shaffer@hacp.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAJpD1hVqhYgaUwvLgpgy9A3GOz2e_H1Q

## "Certificate of Compliance" History

-  Document created by Amy Shaffer (amy.shaffer@hacp.org)  
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-  Document emailed to allieswithvalerie@gmail.com for signature  
2022-09-26 - 8:02:13 PM GMT
-  Email viewed by allieswithvalerie@gmail.com  
2022-09-26 - 8:02:18 PM GMT - IP address: 74.125.210.159
-  Email viewed by allieswithvalerie@gmail.com  
2022-09-27 - 8:07:39 PM GMT - IP address: 66.249.83.223
-  Signer allieswithvalerie@gmail.com entered name at signing as Valerie McDonald Roberts  
2022-09-27 - 10:19:14 PM GMT - IP address: 73.40.252.169
-  Document e-signed by Valerie McDonald Roberts (allieswithvalerie@gmail.com)  
Signature Date: 2022-09-27 - 10:19:16 PM GMT - Time Source: server- IP address: 73.40.252.169
-  Agreement completed.  
2022-09-27 - 10:19:16 PM GMT



Adobe Acrobat Sign



B. Documentation of Public Process

- a. The FY 2023 MTW Annual Plan was available for public comment from Sunday, July 31, 2022, to September 14, 2022. No public comments were received.
- b. Public Hearings to receive comments on the Plan were held on Thursday, September 15, 2022, at 9:30 a.m. and at 5:30 p.m. via Zoom:
  - 9:30 a.m. via Zoom at Meeting ID: 85209658031 Passcode: 392022 (US) +1 669-900-9128 Passcode: 392022
  - 5:30 p.m. via Zoom at Meeting ID: 84106250522 Passcode: 094054 (US) +1 669-444-9171 Passcode: 094054

Persons with disabilities requiring assistance or alternative formats, or wishing to submit comments in alternative formats, were advised to contact the HACP ADA/504 Coordinator at 412-456-5020, Extension 2504; TTY 412-201-5384. The Executive Office addressed all other questions by telephone at 412-456-5012. No person(s) from the public attended either public hearing.

C. Planned and Ongoing Evaluations

The HACP continues to work with the University of Pittsburgh, Graduate School of Public and International Affairs, Center for Urban Studies, on evaluation of the HACP implemented activities. Future work will focus on extending and expanding the evaluation project to include factors relating to economic and social mobility as it relates to MTW initiatives.

D. Lobbying Disclosures

Signed copies of the Certification of Payments to Influence Federal Transactions (HUD-50071) and Disclosure of Lobbying Activities (SF-LLL) forms are located on the subsequent pages.

# Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes. 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

The Housing Authority of the City of Pittsburgh

Program/Activity Receiving Federal Grant Funding

Caster D. Binion, Executive Director

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

Caster D. Binion

Title

Executive Director

Signature



Caster Binion (Sep 27, 2022 12:50 EDT)

Date (mm/dd/yyyy)

September 26, 2022

Previous edition is obsolete

form HUD 50071 (01/14)

# Certificate of Payments to Influence Federal Transaction

Final Audit Report

2022-09-27

Created:	2022-09-26
By:	Amy Shaffer (amy.shaffer@hacp.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAADb2vwvD0RSSLk9APaTDSdPXx4PNKJPAJ

## "Certificate of Payments to Influence Federal Transaction" History

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2022-09-26 - 8:09:37 PM GMT
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2022-09-27 - 12:11:34 PM GMT - IP address: 104.28.77.170
-  Document e-signed by Caster Binion (caster.binion@hacp.org)  
Signature Date: 2022-09-27 - 4:50:05 PM GMT - Time Source: server- IP address: 24.3.211.19
-  Agreement completed.  
2022-09-27 - 4:50:05 PM GMT



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

Review Public Burden Disclosure Statement

PAGE | 106

# Lobbying Disclosure Form

Final Audit Report

2022-09-27

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By:	Amy Shaffer (amy.shaffer@hacp.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAALX2MQSuOWyJHULWaFpCebEUoM56i0ese

## "Lobbying Disclosure Form" History

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2022-09-26 - 10:14:40 PM GMT - IP address: 172.226.87.104
-  Document e-signed by Caster Binion (caster.binion@hacp.org)  
Signature Date: 2022-09-27 - 4:50:20 PM GMT - Time Source: server - IP address: 24.3.211.19
-  Agreement completed.  
2022-09-27 - 4:50:20 PM GMT



## VII. APPENDICES

### Appendix I. Local Asset Management Plan (LAMP)

#### Ongoing Initiatives and Deviations from General Part 990 Requirements

During FY 2023, the HACP will undertake the following initiatives to improve the effectiveness and efficiency of the Agency:

- ❖ The HACP will maintain the spirit of the HUD site based asset management model. It will retain the COCC and site-based income and expenses in accordance with HUD guidelines but will eliminate inefficient accounting and/or reporting aspects that yield little or no value from the staff time spent or the information produced.
- ❖ The HACP will maintain an MTW cost center that holds all excess MTW funds not allocated to the sites or to the voucher program. This cost center and all activity therein will be reported under CFDA #14.881 Moving to Work Demonstration Program. This cost center will also hold the balance sheet accounts of the authority as a whole.
- ❖ The MTW cost center will essentially represent a mini HUD. All subsidy dollars will initially be received and reside in the MTW cost center. Funding will be allocated annually to sites based upon their budgetary needs as represented and approved in their annual budget request. Sites will be monitored both as to their performance against the budgets and the corresponding budget matrix. They will also be monitored based upon the required PUM subsidy required to operate the property. The HACP will maintain a budgeting and accounting system that gives each property sufficient funds to support annual operations, including all COCC fee and frontline charges. Actual revenues will include those provided by HUD and allocated by the HACP based on annual property-based budgets. As envisioned, all block grants will be deposited into a single general ledger fund.
- ❖ Site balance sheet accounts will be limited to site specific activity, such as fixed assets, tenant receivables, tenant security deposits, unrestricted net asset equity, which will be generated by operating surpluses, and any resulting due to/due from balances. All other balance sheet items will reside in the MTW fund accounts, and will include such things as compensated balance accrual, workers compensation accrual, investments, A/P accruals, payroll accruals, etc. The goal of this approach is to attempt to minimize extraneous accounting, and reduce unnecessary administrative burden, while maintaining fiscal integrity.
- ❖ All cash and investments will remain in the MTW cost center. This will represent the general fund. Sites will have a due to/due from relationship with the MTW cost center that represents cash.
- ❖ All frontline charges and fees to the central office cost center will be reflected on the property reports, as required. The MTW ledger won't pay fees directly to the COCC. As allowable under the asset management model, however, any subsidy needed to pay legacy costs, such as pension or terminal leave payments, may be transferred from the MTW ledger or the projects to the COCC.
- ❖ No inventory will exist on the books at the sites. A just in time system will be operational and more efficient, in both time and expense. Also, smaller inventories will be held in COCC mobile warehouse units.

- ❖ Central Operations staff, many of whom are performing direct frontline services such as home ownership, self-sufficiency, and/or relocation, will be front lined appropriately to the LIPH and/or HCV programs, as these costs are 100 percent LIPH and/or Housing Choice Voucher.
- ❖ Actual HCV amounts needed for HAP and administrative costs will be allotted to the HCV program, including sufficient funds to pay asset management fees. Block grant reserves and their interest earnings will not be commingled with HCV operations, enhancing the budget transparency. HCV program managers will become more responsible for their budgets in the same manner as public housing site managers.
- ❖ Information Technology costs will be direct charged to the programs benefiting from them, e.g., the LIPH module cost will be direct charged to AMPs; all indirect IT costs will be charged to all cost centers based on a "per workstation" charge rather than a Fee for Service basis. This will allow for equitable allocation of the expense while saving time and effort on invoicing.

#### Flexible use of Phase in of Management Fees –

As a component of its local asset management plan, the HACP elects to make use of phase-in management fees for 2010 and beyond. The HUD prescribed management fees for the HACP are \$57.17 PUM. The HACP will continue to follow the phase-in schedule and approach for management fees as proposed by the HACP and approved by HUD in 2010, as follows:

#### Schedule of Phased-in Management Fees for HACP –

2008 (Initial Year of Project Based Accounting)	\$91.94
2009 (Year 2)	\$84.99
2010 (Year 3 and beyond)	\$78.03

The above numbers reflect 2009 dollars.

The HACP has increased contract costs over the past year in order to develop new programming and upgrade software. These upgrades will help the HACP reach its ultimate goal of providing outstanding service to the communities. The HACP has been diligently working to reduce its expenditure levels and cut unnecessary COCC costs. It is also working to increase its management fee revenues in the COCC, through aggressive, and we believe, achievable, development and lease up efforts in both the public housing and leased housing programs. The 2021 budget shows COCC at break-even. A major component of the HACP strategic plan is to grow its public housing occupancy, both through mixed finance development and management, as well as in house management, so as to better serve our low-income community and to recapture some of the fees lost to demolition. This requires central office staff, talent, and expense. To make this plan work, i.e., to assist in the redevelopment of the public housing portfolio, we will need the continued benefit of the locked in level of phase in management fees.

It is worth noting that HACP has historically had above normal central office costs driven by an exceedingly high degree of unionization. The HACP has over a half dozen different collective bargaining units; this has driven up costs in all COCC departments, especially in Human Resources, Facility Services and Legal.

## Appendix II. Units Approved for Homeownership Disposition

Units approved for homeownership disposition

(showing those units still in the housing stock as of August 2022)

### PA-28-P001-022

PA Number	Zip	Address	All Units Pittsburgh, PA
PA-28-P001-022	15210	1603 BALLINGER ST #1	
PA-28-P001-022	15210	1611 BALLINGER ST #2	
PA-28-P001-022	15216	219 SEBRING AVE #4	
PA-28-P001-022	15206	252 AMBER ST #5	
PA-28-P001-022	15206	250 AMBER ST #6	
PA-28-P001-022	15206	248 AMBER ST #7	
PA-28-P001-022	15206	45 PENN CIRCLE WEST #8	
PA-28-P001-022	15206	246 AMBER ST #10	
PA-28-P001-022	15206	33 PENN CIRCLE WEST #12	
PA-28-P001-022	15206	39 PENN CIRCLE WEST #16	
PA-28-P001-022	15206	43 PENN CIRCLE WEST #17	
PA-28-P001-022	15206	35 PENN CIRCLE WEST #18	
PA-28-P001-022	15214	411 CHAUTAUQUA ST #19	
PA-28-P001-022	15233	1217 SHEFFIELD ST #20	
PA-28-P001-022	15233	1219 SHEFFIELD ST #21	
PA-28-P001-022	15233	1216 HAMLIN ST #22	
PA-28-P001-022	15233	1218 HAMLIN ST #23	
PA-28-P001-022	15206	6535 ROWAN ST #24	
PA-28-P001-022	15216	2534 NEELD AVE #27	
PA-28-P001-022	15210	712 MONTTOOTH ST #28	
PA-28-P001-022	15210	714 MONTTOOTH ST #29	
PA-28-P001-022	15210	716 MONTTOOTH ST #30	
PA-28-P001-022	15210	718 MONTTOOTH ST #31	
PA-28-P001-022	15210	720 MONTTOOTH ST #32	
PA-28-P001-022	15210	722 MONTTOOTH ST #33	
PA-28-P001-022	15210	724 MONTTOOTH ST #34	
PA-28-P001-022	15210	726 MONTTOOTH ST #35	
PA-28-P001-022	15210	728 MONTTOOTH ST #36	
PA-28-P001-022	15210	730 MONTTOOTH ST #37	
PA-28-P001-022	15212	1429 SANDUSKY ST #38	
PA-28-P001-022	15212	1431 SANDUSKY ST #39	
PA-28-P001-022	15216	142 SEBRING ST #40	
PA-28-P001-022	15210	212 CLOVER ST #41	
PA-28-P001-022	15210	214 CLOVER ST #42	
PA-28-P001-022	15210	216 CLOVER ST #43	
PA-28-P001-022	15210	218 CLOVER ST #44	
PA-28-P001-022	15210	213 ROTHMAN ST #45	
PA-28-P001-022	15210	215 ROTHMAN ST #46	
PA-28-P001-022	15210	217 ROTHMAN ST #47	
PA-28-P001-022	15210	219 ROTHMAN ST #48	
PA-28-P001-022	15207	515 FRAYNE ST #49	
PA-28-P001-022	15207	517 FRAYNE ST #50	

PA Number	Zip	Address	All Units Pittsburgh, PA
PA-28-P001-022	15207	521 FRAYNE ST #51	
PA-28-P001-022	15207	523 FRAYNE ST #52	
PA-28-P001-022	15207	527 FRAYNE ST #53	
PA-28-P001-022	15207	529 FRAYNE ST #54	
PA-28-P001-022	15207	533 FRAYNE ST #55	
PA-28-P001-022	15207	535 FRAYNE ST #56	
PA-28-P001-022	15226	2337 WOLFORD ST #58	
PA-28-P001-022	15212	3564 BRIGHTON RD #60	
PA-28-P001-022	15226	952 BAYRIDGE AVE #61	
PA-28-P001-022	15210	1602 FIAT ST #62	
PA-28-P001-022	15226	2069 WOODWARD AVE #63	
PA-28-P001-022	15216	1309 METHYL ST #64	
PA-28-P001-022	15201	112 SCHENLEY MANOR DR #65	
PA-28-P001-022	15212	1323 OAKHILL ST #66	
PA-28-P001-022	15226	1541 CHELTON AVE #67	
PA-28-P001-022	15210	221 WAYSIDE ST #68	
PA-28-P001-022	15216	1415 KENBURMA AVE #69	
PA-28-P001-022	15201	111 SCHENLEY MANOR DR #70	
PA-28-P001-022	15235	7314 SOMERSET ST #71	
PA-28-P001-022	15216	948 SHADYCREST RD #72	
PA-28-P001-022	15220	1245 CRANE AVE #73	
PA-28-P001-022	15217	3773 BEECHWOOD BLVD #74	
PA-28-P001-022	15210	2113 ECCLES ST #76	
PA-28-P001-022	15210	2115 ECCLES ST #77	
PA-28-P001-022	15210	2119 ECCLES ST #78	
PA-28-P001-022	15210	2121 ECCLES ST #79	
PA-28-P001-022	15210	2125 ECCLES ST #80	
PA-28-P001-022	15210	2127 ECCLES ST #81	
PA-28-P001-022	15210	2133 ECCLES ST #82	
PA-28-P001-022	15210	2135 ECCLES ST #83	
PA-28-P001-022	15212	223 CARRINGTON ST #84	
PA-28-P001-022	15212	225 CARRINGTON ST #85	
PA-28-P001-022	15212	227 CARRINGTON ST #86	
PA-28-P001-022	15212	229 CARRINGTON ST #87	

## PA-28-P001-038

PA Number	Zip	Address
PA-28-P001-038	15207	926 JOHNSTON AVE #259
PA-28-P001-038	15207	930 JOHNSTON AVE #260

## PA-28-P001-039

PA Number	Zip	Address
PA-28-P001-039	15226	738 WOODBOURNE AVE #3
PA-28-P001-039	15210	700 LILLIAN ST #4
PA-28-P001-039	15216	1512 ROCKLAND AVE #6
PA-28-P001-039	15201	4290 COLERIDGE ST #7
PA-28-P001-039	15216	2724 STRACHAN ST #8
PA-28-P001-039	15206	27 PENN CIRCLE WEST #9
PA-28-P001-039	15211	447 SWEETBRIAR ST #10
PA-28-P001-039	15211	449 SWEETBRIAR ST #11
PA-28-P001-039	15211	453 SWEETBRIAR ST #12
PA-28-P001-039	15211	455 SWEETBRIAR ST #13

PA-28-P001-039	15204	3828 MERLE STREET #15
PA-28-P001-039	15226	2010 PIONEER AVE #16
PA-28-P001-039	15211	116 WILBERT ST #17
PA-28-P001-039	15216	1318 ORANGEWOOD AVE #18
PA-28-P001-039	15210	2159 WHITED ST #19
PA-28-P001-039	15210	2161 WHITED ST #20
PA-28-P001-039	15226	958 NORWICH ST #21
PA-28-P001-039	15216	2367 SARANAC AVE #22
PA-28-P001-039	15216	2344 PALM BEACH AVE #23
PA-28-P001-039	15226	1676 PIONEER AVE #24
PA-28-P001-039	15216	2393 SARANAC AVE #25
PA-28-P001-039	15204	3740 MERLE ST #26
PA-28-P001-039	15226	517 ROSSMORE AVE #28
PA-28-P001-039	15210	2073 WALTON AVE #29
PA-28-P001-039	15201	1159 WOODBINE ST #30
PA-28-P001-039	15204	802 STANHOPE ST #31
PA-28-P001-039	15221	8331 VIDETTE ST #32
PA-28-P001-039	15216	1630 DAGMAR AVE #33
PA-28-P001-039	15208	114 N DALLAS AVE #34
PA-28-P001-039	15226	2216 WOODWARD ST #35
PA-28-P001-039	15204	2728 STAFFORD ST #36
PA-28-P001-039	15204	2730 STAFFORD ST #37
PA-28-P001-039	15221	1969 ROBINSON BLVD #38
PA-28-P001-039	15226	707 DUNSTER ST #39
PA-28-P001-039	15204	2736 MERWYN AVE #40
PA-28-P001-039	15204	2738 MERWYN AVE #41
PA-28-P001-039	15210	315 ROCHELLE ST #42
PA-28-P001-039	15212	1233 HODGKISS ST #43
PA-28-P001-039	15212	1219 MARSHALL AVE #44
PA-28-P001-039	15212	3851 HIAWATHA ST #45
PA-28-P001-039	15204	3176 LADOGA ST #48
PA-28-P001-039	15201	118 SCHENLEY MANOR DR #49
PA-28-P001-039	15208	7152 MCPHERSON BLVD #51
PA-28-P001-039	15219	512 MORGAN STREET #52
PA-28-P001-039	15204	1253 BERRY ST #53
PA-28-P001-039	15214	3527 COLBY ST #55
PA-28-P001-039	15206	5461 CLARENDON PL #57
PA-28-P001-039	15206	7216 MINGO ST #59
PA-28-P001-039	15201	4307 COLERIDGE ST #60

## PA-28-P001-050

PA Number	Zip	Address
PA-28-P001-050	15216	1605 CANTON AVE #1
PA-28-P001-050	15216	1607 CANTON AVE #2
PA-28-P001-050	15216	1609 CANTON AVE #3
PA-28-P001-050	15216	1611 CANTON AVE #4
PA-28-P001-050	15216	1613 CANTON AVE #5
PA-28-P001-050	15216	1615 CANTON AVE #6
PA-28-P001-050	15207	4634 MONONGAHELA ST #7
PA-28-P001-050	15207	4632 MONONGAHELA ST #8
PA-28-P001-050	15207	4630 MONONGAHELA ST #9
PA-28-P001-050	15207	4628 MONONGAHELA ST #10
PA-28-P001-050	15207	4626 MONONGAHELA ST #11



PA-28-P001-050	15207	4624 MONONGAHELA ST #12
PA-28-P001-050	15207	4622 MONONGAHELA ST #13
PA-28-P001-050	15207	4620 MONONGAHELA ST #14
PA-28-P001-050	15207	4618 MONONGAHELA ST #15
PA-28-P001-050	15207	4616 MONONGAHELA ST #16
PA-28-P001-050	15207	4732 SYLVAN AVE #17
PA-28-P001-050	15207	4730 SYLVAN AVE #18
PA-28-P001-050	15207	147 ALLUVIAN ST #19
PA-28-P001-050	15207	149 ALLUVIAN ST #20
PA-28-P001-050	15207	151 ALLUVIAN ST #21
PA-28-P001-050	15207	153 ALLUVIAN ST #22
PA-28-P001-050	15207	155 ALLUVIAN ST #23
PA-28-P001-050	15207	157 ALLUVIAN ST #24
PA-28-P001-050	15207	315 FLOWERS AVE #25

## PA-28-P001-051

PA Number	Zip	Address
PA-28-P001-051	15204	1212 STANHOPE ST #1
PA-28-P001-051	15204	1212 1/2 STANHOPE ST #2
PA-28-P001-051	15204	1214 STANHOPE ST #3
PA-28-P001-051	15204	1214 ½ STANHOPE ST #4
PA-28-P001-051	15204	1111 FAULKNER ST #5
PA-28-P001-051	15204	1113 FAULKNER ST #6
PA-28-P001-051	15204	1115 FAULKNER STREET #7
PA-28-P001-051	15204	1117 FAULKNER ST #8
PA-28-P001-051	15204	2703 SACRAMENTO AVE #9
PA-28-P001-051	15204	324 WYCKOFF AVE #10
PA-28-P001-051	15204	326 WYCKOFF AVE #11
PA-28-P001-051	15204	2649 GLASGOW ST #14
PA-28-P001-051	15204	2651 GLASGOW ST #15
PA-28-P001-051	15204	2700 SACRAMENTO AVE #16
PA-28-P001-051	15204	2702 SACRAMENTO AVE #17
PA-28-P001-051	15204	2704 SACRAMENTO AVE #18
PA-28-P001-051	15204	2706 SACRAMENTO AVE #19
PA-28-P001-051	15204	2708 SACRAMENTO AVE #20
PA-28-P001-051	15204	2710 SACRAMENTO AVE #21
PA-28-P001-051	15204	1208 FAULKNER ST #22
PA-28-P001-051	15204	1210 FAULKNER ST #23
PA-28-P001-051	15204	1212 FAULKNER ST #24
PA-28-P001-051	15204	1214 FAULKNER ST #25





# MOVINGtoWORK

HOMEOWNERSHIP PROGRAM | PLAN and PROCEDURES



Amended September 22, 2022

# MOVING to WORK (MTW) HOMEOWNERSHIP PROGRAM PLAN and PROCEDURES

## **TABLE OF CONTENTS**

<b>DEFINITIONS .....</b>	<b>1</b>
<b>I. INTRODUCTION.....</b>	<b>4</b>
<b>II. PURPOSE .....</b>	<b>4</b>
<b>III. OUTREACH.....</b>	<b>4</b>
<b>IV. APPLICANT AND ENROLLMENT .....</b>	<b>4</b>
<b>V. ELIGIBILITY .....</b>	<b>5</b>
A. FIRST-TIME HOMEOWNERS	
B. MINIMUM INCOME REQUIREMENTS	
C. WELFARE ASSISTANCE	
D. EMPLOYMENT REQUIREMENTS	
E. PRIOR MORTGAGE DEFAULT	
F. PHA DEBTS	
G. OWNERSHIP INTEREST	
H. ELIGIBLE PROPERTIES	
I. BUYERS ANNUAL RECERTIFICATION DATE	
<b>VI. PRE-HOMEOWNERSHIP ASSISTANCE REQUIREMENTS .....</b>	<b>7</b>
A. HOMEOWNERSHIP COUNSELING	
B. FIRST MORTGAGE PRE-APPROVAL	
C. HOME PURCHASE AND SALES AGREEMENT	
D. HOME INSPECTION	
<b>VII. FINANCING REQUIREMENTS.....</b>	<b>8</b>
A. GENERAL	
B. FINANCING TERMS	
C. DETERMINING AFFORDABILITY: BUYERS MONTHLY HOMEOWNERSHIP EXPENSE	
D. DOWN PAYMENT	
E. REFINANCING	
<b>VIII. ASSISTANCE COMPONENTS.....</b>	<b>10</b>

A.	ASSISTANCE COMPONENTS AVAILABLE TO PROGRAM PARTICIPANTS	
1.	HOME WARRANTY AND CLOSING COST ASSISTANCE	
2.	FORECLOSURE PREVENTION FUND	
3.	SOFT SECOND DEFERRED PAYMENT FORGIVABLE MORTGAGE	
B.	FINANCING WITH A SOFT-SECOND MORTGAGE CALCULATION	
C.	CALCULATING SOFT MORTGAGE ELIGIBILITY USING THE HOUSING ASSISTANCE PAYMENT	
D.	THE HOMEOWNERSHIP WAITLIST	
E.	PORTABILITY	
<b>IX.</b>	<b>TENANT/BUYER SELECTION FOR VACANT HACP SCATTERED SITE HOMES .....</b>	<b>14</b>
A.	TENANT/BUYER NOTIFICATION	
B.	TENANT/BUYER NOT SELECTED FROM BUYER'S LIST	
C.	TENANT/BUYER FAILS TO COMPLY WITH SALES AGREEMENT	
<b>X.</b>	<b>HACP OCCUPIED SCATTERED SITE TENANT/BUYER SELECTION .....</b>	<b>15</b>
A.	OCCUPIED SCATTERED SITE	
<b>XI.</b>	<b>HOPE VI.....</b>	<b>15</b>
<b>XII.</b>	<b>BUYERS FILE .....</b>	<b>16</b>
<b>XIII.</b>	<b>ACCOMMODATIONS FOR PERSONS WITH A DISABILITY .....</b>	<b>16</b>
<b>XIV.</b>	<b>HACP CONVERTIBLE BRIDGE LOAN.....</b>	<b>16</b>
A.	PURPOSE	
B.	BENEFITS OF THE PROPOSED EXPANSION	
C.	PARTNER SELECTION/PURCHASE RESEALE ENTITY (PRE) REQUIREMENT	
D.	POTENTIAL PARTNERS	
E.	BOND OPTION	
F.	BRIDGE/DEVELOPMENT LOAN TERMS	
G.	EXAMPLE PROJECT FUNDING STRUCTURE	
<b>XV.</b>	<b>BRIDGE LOAN ADMINISTRATION AND IMPLEMENTATION PLAN .....</b>	<b>22</b>
A.	STAFFING	
B.	IMPLMENTATION	

## **MOVING to WORK (MTW) HOMEOWNERSHIP PROGRAM PLAN and PROCEDURES**

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### **DEFINITIONS**

As used herein, the following terms not otherwise defined herein shall have the following meanings:

- 1) “Buyer” shall mean a Homeownership Program participant who has obtained a mortgage pre-approval letter from a lender.
- 2) “Buyer’s annual recertification date” shall mean the date the buyer obtains a lender’s mortgage pre-approval.
- 3) “Buyer’s List” shall mean the list signed by two or more eligible buyers who are interested in purchasing the same HACP owned property.
- 4) “First-time homeowner” shall mean that no family member of the household owned any present ownership interest in a residence of any family member during the three years preceding commencement of homeownership assistance.
- 5) “Gross Aid Standard” means the standard utilized to determine the supplement to the income of a low income household to enable the buyer to purchase standard quality housing in the private marketplace.
- 6) “Qualified Mortgage” shall be insured by FHA, Guaranteed by VA, or funded by Fannie Mae, Freddie Mac, or other governmental entity, state or local housing finance agency, nonprofit organization, or a regional Federal Home Loan Bank under one of its affordable housing programs.
- 7) “Soft-second mortgage Calculation” shall mean the calculation used to estimate a non-paying interest free second mortgage loan offered to eligible public housing Program participants. The amount of the soft-second mortgage is reduced 10 percent (10%) a year over a ten-year period.
- 8) “Homeownership Expense Payment” consists of the principal, interest, taxes, and insurance (PITI) associated with first mortgage debt along with the corresponding monthly utility allowance for unit size, maintenance expense, and major repairs in accordance with 24 CFR 982.635 C2.
- 9) “Total Family Payment” or “TFP” means that portion of the homeownership expense that the family must pay. It is generally thirty percent (30%) of the family's adjusted income, plus any difference between the payment standard and the actual housing cost.
- 10) “Subordination” prioritizes collateralized debt, ranking one behind another for purposes of collecting repayment from a debtor.



## **I. INTRODUCTION**

The Housing Authority of the City of Pittsburgh (HACP) operates a Moving To Work (MTW) Homeownership Program (the "Program") for current Low-Income Public Housing (LIPH) residents, Housing Choice Voucher (HCV) holders, or those eligible to receive LIPH and/or HCV assistance who desire to purchase their first home and primary residence within the City of Pittsburgh. In addition to other benefits, the HACP will offer a deferred payment Soft Mortgage based upon a payment calculation as defined in Section VIII. part C. Eligible participants will be placed on the HACP Homeownership Waiting List for home purchase based on the date of their mortgage pre-approval letter from an approved lender.

## **II. PURPOSE**

The specific objectives of the Program are:

- Expanding homeownership opportunities for low-income families and families having members with disabilities.
- Providing an opportunity for first-time low-income homebuyers to purchase a single- family home within the City of Pittsburgh.
- Encouraging HACP families to acquire appreciable assets and move toward the goal of economic self-sufficiency and eventual independence from government assistance programs.

## **III. OUTREACH**

Outreach will be conducted by the HACP's Homeownership Office to encourage participation in the Program. Informational flyers and brochures as well as the web site <http://www.hacp.org/housing-options/home-ownership> have been developed to target those persons interested in participating in the Program. The Program will also be promoted by the Resident Self-Sufficiency (RSS) Department through its newsletters and referrals by Service Coordinators. The HACP will also highlight the program periodically in other agency publications such as the "News and Views".

## **IV. APPLICATION AND ENROLLMENT**

Interested persons may apply to participate in the Program by contacting a Department of Housing and Urban Development (HUD)-approved housing counseling agency to enroll in the required homeownership education class. Participants will receive initial assessments of their credit rating provided by the HUD-approved education and credit counseling service provider.

The HACP will consider the participant enrolled in the Program once the applicant has completed the following steps: 1)submit a complete application for assistance (including all required documentation), 2) submit a copy of the certificate received upon completion of an approved homebuyers education class 3) met the HACP eligibility requirements as outlined in Section V. The HUD approved education provider shall issue a certificate of satisfactory completion to each participant and maintain a copy of the certificate on file. The HACP will consider the participant a "buyer" when the participant obtains a loan pre- approval letter.

## **V. ELIGIBILITY**

Program participants must meet one of the following four (4) criteria:

- Be a current Low-Income Public Housing (LIPH) resident;
- Be a Housing Choice Voucher (HCV) resident;
- Be a person who is on the HACP waitlist for LIPH or HCV who has received an eligibility letter from HACP's Occupancy Department for the HCV or LIPH Program;

In the event that either waitlist is closed, a non-resident must be otherwise eligible to receive HCV or LIPH assistance (whichever program requirements are less restrictive for the applicant) as determined by HACP in order to participate in the Program. Non-residents must receive an eligibility letter from HACP for Homeownership Purposes only. The following additional eligibility requirements for participation in the Program shall also apply:

### **A. FIRST-TIME HOMEOWNER:**

Each LIPH and HCV waiting list or otherwise eligible family must be a first-time homebuyer. A first-time homeowner means that no family member of the household owned any present ownership interest in a residence of any family member during the three (3) years preceding commencement of homeownership assistance. However, a single parent or displaced homemaker who, while married, owned a home with his/her spouse (or resided in a home owned by a spouse) is considered a "first-time homeowner" for purposes of the Program.

If the HACP determines that a family member with a disability requires homeownership assistance as a reasonable accommodation, the first-time homeowner requirement may not apply.

### **B. MINIMUM INCOME REQUIREMENTS:**

At the time the family obtains a mortgage pre-approval letter, the head of household, spouse, and/or other adult household members who will purchase the home must have a minimum gross annual income equal to or greater than 50% area median income (AMI) as published by HUD annually

A family whose head, spouse or sole member is a person with a disability may be exempt from the minimum income requirement provided there exists a sufficient combination of monthly household income and initial down payment money to satisfy the lending institution's pre-approval requirements for the purchase of the property and all other applicable HACP requirements relating to eligibility are met.

**C. WELFARE ASSISTANCE:**

Welfare assistance income shall be included only for those adult elderly or families with members having disabilities who will own the home. Stated otherwise, with the exception of elderly and families with members having disabilities, the HACP will disregard any "welfare assistance" income in determining whether the family meets the minimum income requirement. Welfare assistance includes assistance from Temporary Assistance for Needy Families (TANF); Supplemental Security Income (SSI) that is subject to an income eligibility test; food stamps; general assistance; or other welfare assistance defined by HUD. The disregard of welfare assistance income shall affect the determination of minimum monthly income in determining eligibility for the Program.

**D. EMPLOYMENT REQUIREMENT:**

With the exception of families having members with disabilities and elderly households, each family must demonstrate that one or more adult members of the family who will own the home at commencement of homeownership assistance is employed full-time (an average of thirty (30) hours per week). Families with one (1) or more members who are self-employed shall be eligible under this section if they meet all other requirements as stated herein.

The HACP will also consider an interruption of employment of no more than one (1) month during the prior one (1) year as meeting the definition of "full time employment" if the employed family member has been continuously employed for a period of at least one (1) year prior to the interruption and is currently employed at the time of the execution of the sales agreement.

**E. PRIOR MORTGAGE DEFAULT:**

The HACP will not approve a homeownership sales agreement where the head of household, the head of household's spouse or other adult member of the family defaulted on a mortgage loan within the previous three (3) years. Such actions will render the family ineligible to participate in the Program.

**F. PHA DEBTS:**

Prospective participants in the Program shall be ineligible for participation in the Program if they owe any debt or portion of a debt to the HACP or any other PHA (Public Housing Authority). Except as provided in HACP's Admissions and Continued Occupancy (ACOP) Policy and HCV Program Administrative (Admin) Plan, nothing in this provision will preclude participants who have fully repaid such debt(s) from participating in the Program.

**G. OWNERSHIP INTEREST:**

Except for cooperative members who have acquired cooperative membership shares at the commencement of homeownership assistance, no family member may have a present ownership interest in a residence at the commencement of participation in the homeownership program. This requirement does not apply to the family's right to purchase title to the residence under a lease-purchase agreement. "Present ownership interest" means that no member of the household has had an "interest in a home", including title to a home in the past three (3) years.



**H. ELIGIBLE PROPERTIES:**

Eligible properties shall include residentially zoned single-family homes, row homes, condominiums, and townhomes within the City of Pittsburgh. Multifamily or non-residential properties are ineligible. The HACP may sell existing scattered sites as identified on Exhibit A attached hereto to buyers within the Program. In the event a HACP scattered sites property is not sold through the Program, the property may be reoccupied for lease.

**I. BUYER'S ANNUAL RECERTIFICATION DATE:**

The date the buyer obtains a lender's mortgage pre-approval letter shall be the program participant's annual recertification date for purposes of calculating homeownership assistance amounts. The annual recertification date will be used to calculate the HACP's assistance benefits and/or soft-second mortgage amount. The lender or the HACP shall verify the buyer's income and employment status during the mortgage pre-approval process and the lender shall provide buyer's income and employment status to the HACP upon request. If a buyer's income increases or declines subsequent to a lender issuing a mortgage pre-approval letter, the HACP at its discretion may require recalculation of assistance amounts.

**VI. PRE-HOMEOWNERSHIP ASSISTANCE REQUIREMENTS**

**A. HOMEOWNERSHIP COUNSELING:**

Before a family is eligible for homeownership, the family must attend and successfully complete a pre-assistance HUD approved homeownership and housing counseling program. Such homeownership and housing counseling program will be provided or approved by the HACP prior to the commencement of assistance and will include instruction relating to home maintenance; budgeting and money management; credit counseling; negotiating purchase price; securing mortgage financing and loan approvals; finding a home including information about schools and transportation; fair housing laws and local enforcement agencies; the advantages of purchasing and locating homes in areas that do not have a high concentration of low-income families; and the Real Estate Settlement Procedures Act; state and Federal truth-in-lending law; and how to avoid loans with oppressive terms and conditions.

**B. FIRST MORTGAGE PRE-APPROVAL:**

Upon completion of the Homeownership Counseling Program, the participant is to complete a mortgage pre-approval application to determine if they qualify for a first mortgage. Participant is to provide the HACP with a first mortgage pre-approval letter and closing cost estimate which will detail the cost associated with obtaining the mortgage. The HACP requires tenant buyers to request a mortgage pre-approval letter and closing cost estimate that reflects the highest amount of first mortgage they are eligible to receive.



**C. HOME PURCHASE AND SALES AGREEMENT:**

Participants in the Program will be required to locate and purchase a home or execute a contract of sale or lease purchase a home, within the limits of the City of Pittsburgh. “Homeownership eligibility” begins on the date the buyer successfully completes the following steps: 1) submit a complete application for assistance (including all required documentation), 2) submit a copy of the certificate received upon completion of an approved homebuyer’s education class 3) met the HACP eligibility requirements as outlined in Section V. It is the responsibility of the buyer to share all agreements of sale with the HACP. The following must remain true of any offer in order to remain eligible for the funds from the HACP’s Homeownership Program:

1. The purchase price does not exceed the amount used to establish your eligibility
2. The loan amount does not exceed the amount used to establish your eligibility
3. The home is within the City of Pittsburgh limits
4. Any deficiencies listed on the home inspection report must pass HQS standards
5. Any deficiencies that do not meet HQS standards must be remedied by the seller

**D. HOME INSPECTION:**

The buyer shall select and pay for an independent professional inspection in accordance with the sales agreement. Such independent inspectors must be qualified by the American Society of Home Inspectors (ASHI) or possess equivalent credentials acceptable to the HACP. The independent inspectors must furnish a copy of the inspection results to both the buyer and the HACP. The HACP must review the independent inspector’s report and determine whether to go forward or terminate the sales agreement based upon its review.

A contingency clause in the sales agreement must provide that the buyer is not obligated to pay for any necessary repairs. The buyer is prohibited from directly making repairs at their own expense prior to closing. HACP, in its sole discretion, may advise buyers to request the seller to cure essential deficiencies found in the inspection report. If an agreement cannot be reached between the buyer and seller, the HACP will advise the buyer that the property does not meet program requirements and does not qualify for HACP homeownership program funding. If the Seller is the HACP, then the HACP, in its sole discretion, may pay for any deficiencies found in the inspection report or the HACP may terminate the sales agreement. Similarly, the buyer has the right to cancel the sales agreement without penalty if the HACP is unwilling to make all necessary repairs cited in the inspection.

**VII. FINANCING REQUIREMENTS**

**A. GENERAL:**

The HACP may not require participants to use a certain lender or a certain type of financing. However, financing for purchases under this Program must generally comply with secondary mortgage market requirements. The HACP will only approve a fixed interest rate “Qualified Mortgage” provided by a lender. A Qualified Mortgage shall be insured by FHA, Guaranteed by VA, or funded by Fannie Mae, Freddie Mac, or other governmental entity, state or local housing finance agency, nonprofit organization, or a regional Federal Home Loan Bank under

one of its affordable housing programs. The HACP will not approve any lending practices that it determines, in its reasonable discretion, to be abusive or predatory including loans offered at a rate above Prime to individuals who do not qualify for Prime Rate loans, i.e., subprime loans. Seller financing will be on a case-by-case basis, including instances where the HACP or nonprofit organization is the seller. It is the goal of the Program for participants to utilize all other assistance for which they are eligible prior to receiving assistance from this Program.

If the HACP is the seller, then the Program may provide for below-market purchase prices or below-market financing to facilitate below-market purchases. Discounted purchase prices may be determined on a unit-by-unit basis, based on the particular buyer's ability to pay, or may be determined by any other fair and reasonable method. Below-market financing may include any type of public or private financing, including but not limited to purchase-money mortgages, non-cash second mortgages, promissory notes, guarantees of mortgage loan from other lenders, shared equity, land installment contract or lease-purchase arrangements.

**B. FINANCING TERMS:**

The proposed loan terms must be submitted to and approved by the HACP and the HACP will determine, in its sole discretion, the affordability of the family's proposed loan terms and whether they are appropriate in view of current market conditions. Participants are required to provide the HACP with a copy of their loan application also known as the Uniform Residential Loan Application (URLA)/ Fannie Mae form 1003 so that this determination can be made. If a mortgage is not funded by Fannie Mae or Freddie Mac or FHA-insured, or VA-guaranteed, the HACP may require lenders to comply with generally accepted mortgage underwriting standards consistent with HUD/FHA, Fannie Mae, Freddie Mac, RHS, or the Federal Home Loan Bank requirements. Seller financing will be reviewed on a case-by-case basis.

**C. DETERMINING AFFORDABILITY: BUYER'S MONTHLY HOMEOWNERSHIP EXPENSE:**

The HACP will determine, in its sole discretion, the affordability of the family's proposed loan terms and whether they are appropriate in view of current market conditions. In making such determination, HACP may take into account other family expenses, including but not limited to child care, unreimbursed medical expenses, and education and training expenses. The monthly expenses of Program Participants and those who are listed on the lender's mortgage application should not exceed a total estimated housing expenses debt ratio of thirty-five percent (35%) of the combined gross monthly income of adult members of the household. The housing debt expense should include mortgage principal, mortgage interest, property taxes, homeowner's insurance condominium or association fees, monthly capital improvement expense (\$20 per month), monthly maintenance expense (\$20 per month), and a monthly utilities estimate obtained from the most recent HACP Program utility allowance schedule for the appropriate unit type.

**D. DOWN PAYMENT:**

Buyers must contribute from their own funds at least one percent (1%) of the net sales price of either a HACP owned or a private market property. The family may use an Individual Development Account (IDA) or Family Self-Sufficiency (FSS) escrow account for their down payment. LIPH program participants who established homeownership "lease-purchase" accounts prior to January 1, 2007, may utilize these accounts for their down payment.

**E. REFINANCING:**

No buyer while receiving HACP second mortgage assistance may refinance their mortgage(s) or incur additional debt secured by the home without the prior written approval of HACP. Upon a written request, the HACP should consider the subordination of its mortgage(s) on a case- by- case basis. Refinancing proposals must not seriously impact the affordability of the property or security of the public investment. Refinance subordination reviews will be of the following criteria.

1. The participants must document an identified reasonable need to lower monthly payments/interest rate, change the mortgage product. The borrower can only receive “cash-out” for home improvement loans, emergency non-insured property damage, or non-insured medical expenses. Any other “cash-out” requests, including but not limited to, bill consolidation loans, line of credit, future advance, personal loans, medical collections, other mortgages or encumbrances or liens will not be considered.
2. The participant must continue to occupy the home as their primary residence until the term of the HACP mortgage expires and a mortgage satisfaction is granted.
3. Property taxes on the subject property or any other property must not be delinquent.
4. In any case, the HACP will only subordinate once during the term of the loan and only to a second position unless HACP’s position was 3rd position at the commencement of the HACP loan.

**VIII. ASSISTANCE COMPONENTS**

**A. ASSISTANCE COMPONENTS AVAILABLE TO PROGRAM PARTICIPANTS:**

**1. HOME WARRANTY AND CLOSING COST ASSISTANCE**

The maximum amount of financial assistance is \$8,000 for home warranty and closing costs assistance (maximum \$7000.00 closing cost assistance and maximum \$1,000.00 home warranty reimbursement). At its discretion and based upon funding availability, the HACP will reimburse the home buyer the cost of home warranty renewals for a period of up to 3 years or until funds from the initial \$8,000.00 is exhausted – whichever comes first.

The HACP may approve the prepayment of a home warranty for a property prior to closing. It is the responsibility of the tenant/buyer to provide the HACP with a written quotation from the vendor for these services prior to closing. Subject to budgetary constraints, the HACP may pay closing costs one time per buyer and if a buyer fails to close on their sales agreement, buyer is not eligible to receiving additional closing costs assistance for a new sales agreement for one (1) year.



## **2. FORECLOSURE PREVENTION FUND:**

The maximum amount of financial assistance is \$3,000 for foreclosure prevention. In the event a buyer defaults on their mortgage and receives notice of default by their lender within five (5) years of their closing date, they receive up to six (6) months of HACP mortgage assistance if they apply for and comply with all requirements of the Pennsylvania Homeowners' Emergency Mortgage Assistance Program (HEMAP). As a Program safeguard, if in the event 10% or more of program buyers default upon their mortgage(s), Section VII C will be amended to decrease the maximum buyer debt ratio for new buyers to thirty-percent (30%) of gross monthly income.

## **3. SOFT SECOND DEFERRED PAYMENT FORGIVABLE MORTGAGE:**

The maximum forgivable deferred payment soft-second mortgage is \$ 52,000. Subject to budgetary constraints, the HACP may provide a forgivable soft-second mortgage financing to eligible participants. Such financing shall be secured in most cases by a second mortgage (the "Second Mortgage"). However, in some cases, the HACP mortgage will be recorded as a third mortgage subordinate to mortgages securing bank and other government financing provided, for example, by the Urban Redevelopment Authority (URA) of Pittsburgh.

The HACP will subordinate to both the 1st mortgage lender and Pittsburgh's Urban Redevelopment Authority in the event that a participant qualifies to receive an additional deferred soft second mortgages from the URA. If the participant is eligible to receive additional, second deferred payment mortgages not provided by the first mortgage Lender or the HACP they must utilize the full amount of the additional mortgage prior to utilizing HACP's.

The HACP's forgivable soft second mortgage in no case shall exceed \$52,000. The forgivable second mortgage is forgiven on a prorated basis over a ten-year period. In the event a first or second mortgage does not exist, the HACP's mortgage will be recorded as a first mortgage.

This means in the event a participant qualifies for a deferred payment soft second mortgage the HACP may exercise its authority to require the participant to reduce the 1<sup>st</sup> mortgage amount accepted from the bank by an amount specified by the HACP in order to achieve a lower Homeownership Expense Payment. The HACP may also provide a soft mortgage to increase the buyers purchase capacity as appropriate in view of current market conditions.

**B. FINANCING WITH A SOFT-SECOND MORTGAGE CALCULATION:**

The Homeownership Expense includes principal, interest, taxes, Homeowners insurance, mortgage insurance premium if required (PITI); this information will be obtained from the Lenders pre-approval and Closing Cost Estimate. In addition to these expenses a monthly utility allowance, routine home maintenance allowance, and major repairs allowance, are also a part of the Homeownership Expense. If the first mortgage Lenders proposed (PITI) payment causes participants estimated Homeownership Expense ratio to exceed thirty-five percent (35%) of gross monthly income the HACP provide a soft-second mortgage to lower the buyer's monthly debt obligation to the lender. This means in the event a participant qualifies for a deferred payment soft second mortgage the HACP may exercise the authority to require the participant to reduce the 1st mortgage amount accepted from the bank by an amount specified by HACP in order to achieve a lower Homeownership Expense Payment. The HACP may also provide a soft mortgage to increase the buyers purchase capacity as appropriate in view of current market conditions.

The Homeownership Expense includes principal, interest, taxes, Homeowners insurance, mortgage insurance premium if required (PITI); this information will be obtained from the Lenders pre-approval and Closing Cost Estimate. In addition to these expenses a monthly utility allowance, routine home maintenance allowance, and major repairs allowance, are also a part of the Homeownership Expense.

If the first mortgage Lenders proposed (PITI) payment causes participants estimated Homeownership Expense ratio to exceed thirty-five percent (35%) of gross monthly income the HACP may provide a soft-second mortgage to lower the buyer's monthly debt obligation to the lender. The HACP may also provide a soft- second mortgage to increase the buyers purchase capacity as appropriate in view of current market conditions.

**C. CALCULATING SOFT – SECOND MORTGAGE ELIGIBILITY USING THE HOUSING ASSISTANCE PAYMENT:**

The HACP Second Mortgage loan amount shall be determined and calculated by using the Housing Assistance Payment which is equal to the lower of the payment standard or the actual monthly Homeownership Expense Payment for the unit minus the Total Tenant Payment (TTP). The Homeownership Program will use the currently in effect Housing Choice Voucher Payment Standard.

The Utility Allowance for the unit will be determined using a monthly utilities estimate obtained from the most recent HACP Housing Choice Voucher Program Utility Allowance schedule for Tenant Furnished Utilities for the appropriate unit size. Standard Utility Allowances for detached house type assumes natural gas heating, natural gas cooking, other electric (lights and appliances), air conditioning, natural gas water heating, water, sewer, trash, tenant supplied range and refrigerator. The Gross Aid Standard is obtained from the most recent HACP Section 8 Housing Choice Voucher Program Voucher Payment Standards.

- Deferred payment mortgage loan amount calculation for a buyer: Homeownership Expense Payment or Voucher Program Payment Standard for unit size (whichever is less) minus the Total Tenant Payment (TTP) x 12 months x 10 years = maximum Second Mortgage loan amount. Loan amounts at or below \$52,000 will be issued under the terms of the deferred payment forgivable soft second mortgage.
- The deferred payment mortgage loan amount calculation above shall be determined during buyer's loan pre-approval process and participant will be provided a written estimated soft mortgage eligibility and soft mortgage eligibility amount. The notice will also advise whether the soft mortgage is to be applied to decrease the 1st mortgage debt obligation and/or increase purchase capacity. This notice will also advise what amount of eligible assistance can be utilized in the form of a forgivable softs second mortgage. This notice is to be shared with the buyer unless HACP receives express written consent from the buyer to share this information with the buyer's prospective lender and/or Real Estate agent prior to buyer selecting a home to purchase.
- Prior to submitting a sales agreement to the seller to purchase a home the buyer must provide a copy of the sales agreement to the HACP for review. The HACP Homeownership participants must utilize a licensed professional to assist with their purchase transaction including but not limited to, the drafting of their sales contract.
- The HACP will issue a final approval notice advising of amount of assistance the buyer is to receive based on the selected Property and cost associated with the purchase. After the primary lender has made a mortgage loan commitment in accordance with the buyer's sales agreement, the buyer is not eligible to request or have the HACP recalculate the buyer's HACP Second Mortgage amount.
- The HACP Soft Forgivable Mortgage shall be reduced each month (1/120) by the amount (eligible monthly MAP) used in the Loan Amount Calculation above; provided that, buyer remains in good standing in the Program, continues to occupy the property as their primary residence, and is not in default under the mortgage. In the event of a mortgage default or if the buyer is no longer residing in the home, any further HACP Second Mortgage debt reduction shall occur while such default or non-occupancy condition continues. The buyer in this program who defaults on their mortgage will not be eligible for housing assistance through the HACP (or through any HUD funded housing assistance program) until the outstanding obligation on the HACP 2<sup>nd</sup> mortgage has been satisfied.
- Once a buyer completes a home purchase, interim and monthly re-certifications of income and annual Housing Quality Standard (HQS) inspections are no longer required.

Note: Program participants who established homeownership 'lease-purchase' accounts prior to January 1, 2007, may utilize such accounts towards their down payment or closing costs.

**D. THE HOMEOWNERSHIP WAITING LIST:**

A participant's position on the Homeownership Program Waiting List will be determined by the date the following steps are completed: 1) submit a complete application for assistance (including all required documentation), 2) submit a copy of the certificate received upon completion of an approved homebuyer's education class 3) met the HACP eligibility requirements as outlined in Section V.



Once the buyer obtains a preapproval letter, the participant will have sixty (60) days from the date of their mortgage pre-approval letter to execute a sales agreement on the property of their choice and provide the HACP with a copy of the sales agreement.

The participant/buyer must have a settlement within ninety (90) days from the date that the mortgage application package is submitted to underwriting.

Persons failing to sign a sales agreement, complete a mortgage application in a timely manner as per the sales agreement, or reach settlement within the allotted time period will be removed from the list. Participants can get a new pre-approval letter and will be put back on the list based on the new date of the new pre-approval letter.

Anyone on the Homeownership Waiting List when annually budgeted funds become exhausted will remain on the list for the subsequent budget year. If a participant/buyer does not meet the stated deadlines for performance in the program, the HACP will review on a case by case basis to determine if and what remedies are available to assist in the completion of the transaction. Any applicant who remains active but does not purchase a home within one (1) year from the eligibility date will be required to supply updated income information for purposes of recalculating eligibility.

**E. PORTABILITY:**

A current HCV Program family who qualifies for homeownership assistance may Port to another jurisdiction and purchase a home outside the HACP's jurisdiction through another PHA's program, provided the receiving PHA is administering a homeownership program, is accepting new families into its homeownership program, and considers the family eligible based upon the receiving PHA's eligibility requirements. Participants porting to other jurisdictions are not eligible for Homeownership Program Assistance from the HACP.

**IX. TENANT/BUYER SELECTION FOR VACANT HACP SCATTERED SITES HOMES**

Upon the HACP's approval to release for sale a HACP-owned property, as they become vacant, the Program staff collects applicants for a Buyer's List of interested mortgage pre- approved tenant buyers for each home address during a minimum of five (5) business days prior to HACP finalizing and closing the Buyer's List. The Buyer's List is to be utilized in the event two or more mortgage pre-approved applicant buyers desire to purchase the same property. A tenant buyer shall only be on one property Buyer's List or sign one sales agreement at a time. A buyer is only eligible to sign a Buyer's List if the tenant buyer's mortgage pre-approval letter states a loan amount that is at least equal to or exceeds the property net sales price after applying applicable discounts and other Program benefits. If there are no buyers for a vacant unit, the HACP may lease that unit as a standard LIPH scattered site rental unit to the next eligible family on the LIPH waiting list.

After collecting interested tenant/buyers for up to five (5) business days, HACP shall select from the Buyer's List the buyer based upon the following criteria:

- The date of their mortgage pre-approval letter shall be the first priority for the selection of any tenant/buyer that the HACP enters into a sales agreement from the property Buyer's List.

a) In the event that two (2) tenant/buyers have the same date on their mortgage pre-approval letter, the HACP shall select the tenant/buyer based upon the tenant/buyer with a lower total debt-to-purchase price ratio.

- In the event that a home does not sell during its initial sales offering, the HACP may collect additional interested mortgage qualified tenant/buyers from either low income public housing residents or HCV holders for an additional five (5) business day period and form a new Buyer's List to repeat the buyer selection process at the HACP's discretion.

**A. TENANT / BUYER NOTIFICATION:**

The tenant/buyer who is selected by the HACP to enter into a property sales agreement shall be notified by the HACP and requested to execute a sales agreement.

**B. TENANT / BUYER NOT SELECTED FROM BUYER'S LIST:**

Once the HACP enters into a sales agreement with a tenant/buyer from the Buyer's List, the remainder of tenant/buyers not selected are released from this Buyer's List and are eligible to sign up for a new property Buyer's List.

**C. TENANT / BUYER FAILS TO COMPLY WITH SALES AGREEMENT:**

If the HACP enters into a sales agreement with a tenant/buyer and the tenant/buyer fails to fulfill the terms and conditions of the sales agreement, the tenant/buyer shall not be eligible to participate in the Program for one (1) year following the date of the sales agreement. If a tenant/buyer fails to complete the sales process and the tenant/buyer's sales agreement is terminated, the HACP will review the property Buyer's List and the Homeownership staff will offer the property to the next qualified buyer as outlined in the Tenant/Buyer Selection Process.

**X. HACP-OCCUPIED SCATTERED-SITE TENANT/BUYER SELECTION**

**A. OCCUPIED SCATTERED SITE:**

If an HACP public housing tenant is currently leasing a scattered site, the occupying tenant has the right of first refusal to purchase the scattered site property. If the current family leasing the unit chooses not to purchase the unit in which they reside but want to remain in good standing as a tenant, they may remain in the unit as leasing tenants. If an occupying tenant exercises the right of first refusal and fails to purchase the property, they may remain in the unit as a low income public housing tenant as long as they continue as a tenant in good standing. In no case shall a tenant participating in the homeownership program who fails to purchase a home gain any rights to their dwelling beyond those rights of a low-income public housing tenant.

**XI. HOPE VI**

No MTW Homeownership Program benefits may be applied to HOPE VI programs.



## **XII. BUYER FILES**

Buyer files should contain copies of the following items and be maintained by the HACP for a period of no less than ten (10) years following closing.

- a. Homebuyer education certificate from a HUD approved education provider
- b. Mortgage pre-approval letter from a lender
- c. Signed agreement of sale and purchase
- d. Buyer debt ratio calculation
- e. Buyers Uniform Residential Loan Application and are Loan Estimate when applicable
- f. Documentation that buyer meets HACP eligibility
- g. HACP financial checks issued to or on behalf of buyer
- h. Closing disclosure and/or ALT-A
- i. Home Inspection Report
- j. Second mortgage calculation
- k. Closing costs assistance form

## **XIII. ACCOMMODATIONS FOR PERSONS WITH A DISABILITY**

The HACP is committed to ensuring the Program is accessible to persons with disabilities and will make outreach efforts to market the Program to such persons. The HACP will address requests from those persons with disabilities through its reasonable accommodation policy and procedure to assure equal access to the homeownership program.

## **XIV. HACP CONVERTIBLE BRIDGE LOAN**

### **A. PURPOSE:**

The proposed expansion of the current, Housing Authority of the City of Pittsburgh (HACP) Homeownership Program is to provide Capital Fund assistance in the form of a short term bridge loan to designated partner agencies and organizations, demonstrating the practical capability to carry out the rehabilitation of their own acquired and/ or the HACP scattered - site units for the purpose of reselling the units to Homeownership Program Participants upon completion of the rehab. Upon the completed sale to the Homeownership Program Participant, The Bridge Loan will “pass-thru” to the Homeownership Program Participant in the form of a second deferred mortgage. Therefore, the funding originally issued to the partner to finance the rehab will convert to a write-down of the sales price under the provisions of the HACP’s Homeownership Program concerning the sale of scattered sites.

The write-down of the resale of the unit to Homeownership Program Participants will be equal to the Participant’s second mortgage determination but no more, than what was “bridged” to the Partner. If the Participant is determined to be eligible to receive more than what was bridged to the Partner, the HACP will make up the difference in the write-down amount by issuing the said Participant a second deferred payment mortgage in addition to the write-down of sales price.

**B. BENEFITS OF THE PROPOSED EXPANSION:**

REDUCED RISK TO THE HACP:

- a. Develop for purchase housing at a low-cost;
- b. No acquisition cost to the HACP directly;
- c. No financing cost to the HACP unless the property is recaptured, and the loan used to finance development is assumed by the HACP.

EFFICIENT ALLOCATION OF RESOURCES:

- a. Produces affordable homeownership units with little to no increase to budgeted spending;
- b. Serve as a framework for future development;
- c. Safe disposition of Public Housing Units to Home Ownership.

RESULTS OF THE PROPOSED EXPANSION:

- a. Increases property tax revenue for the City of Pittsburgh;
- b. Increases the effectiveness of existing Home Ownership Programming;
- c. Strengthens the HACP's partnerships and position of being the highest, quality provider of affordable housing in the City of Pittsburgh;
- d. Permits the HACP to influence homeownership creation within current budget constraints while maintaining the current position of being the flagship agency providing real estate development services.

**C. PARTNER SELECTION/ PURCHASE RESALE ENTITY (PRE) REQUIREMENT:**

Section 32 permits the sale of units directly to Low-Income Public Housing (LIPH) or non-public housing residents or to a Purchase Resale Entity (PRE), which in turn must resell them to low-income households. If a PRE is used, the Homeownership Plan must include the firm's qualifications, marketing plan, and a description of that entity's responsibilities.

**PARTNER/PRE CRITERIA:**

1. LEGAL CAPACITY:

- a) Proven performance within contractual agreements;
- b) Sign a written agreement specifying the rights and responsibilities of the PHA and PRE;
- c) Provide assurances regarding compliance with the program;
- d) Produce evidence of adequate record-keeping and reporting.

2. PRACTICAL CAPABILITY:

- a) Track record of SFR rehabilitation within Davis/Bacon rules;
- b) Procurement & construction expertise;
- c) Provide limitations on PRE administrative, overhead, and compensation/profit;
- d) Implement deed restrictions on acquisition and resale of units.

3. GOAL AND MISSION SYNERGY:

- a) Encourages the growth of organizations capable of developing affordable;
- b) Agree to sell units only to low or moderate-income households. Agree to transfer ownership of units back to the HACP if the PRE cannot sell the units within five (5) years or less.

**D. POTENTIAL PARTNERS INCLUDE:**

- a) Habitat for Humanity
- b) The Hazelwood Initiative
- c) The Pittsburgh Housing and Development Corporation (a subsidiary of the URA); and
- d) Pittsburgh Community Land Trust
- e) Other partners as they are identified.

**E. BOND OPTION:**

An enhancement to this program is the addition of a bond option: The HACP would provide a single payment of \$45,000 subsidy to the Urban Redevelopment Authority (URA) or the Participant, the URA will contribute a subsidy of approximately \$85,000 to the Participant or to the Project (new or rehab housing), to ensure affordability for the home purchase. This program will be geared to the “workforce” population that is 80% AMI.

**F. BRIDGE / DEVELOPMENT LOAN TERMS:**

LOAN AMOUNT: 25% of the project cost up to \$52,000 Term: up to 18 months, maybe extended for a maximum of 24 months

PAYMENT PROVISION: 0% interest during the term of loan satisfied upon sale of the unit to Program Participant

RECAPTURE: The HACP Unit may be recaptured by the HACP if there is no final sale within 60 months of Bridge Loan Agreement

SUBORDINATION: The HACP Bridge loan will be in 1st lien position but will subordinate Lender financing which cannot exceed 50% of projected project cost and must be assumable by the HACP in the event of recapture from the PRE.

ADDITIONAL:

- Project costing \$208,000 or more is eligible for a full \$52,000 loan amount.
- The project must be approved by the loan committee. The affordability of the end product will be reviewed.
- The home must be sold to Program Participants within 18 months of loan issuance, or the entire loan will become due to the HACP.
- Liquidity Test: the PRE must verify at least 25% of the total project cost in reserves

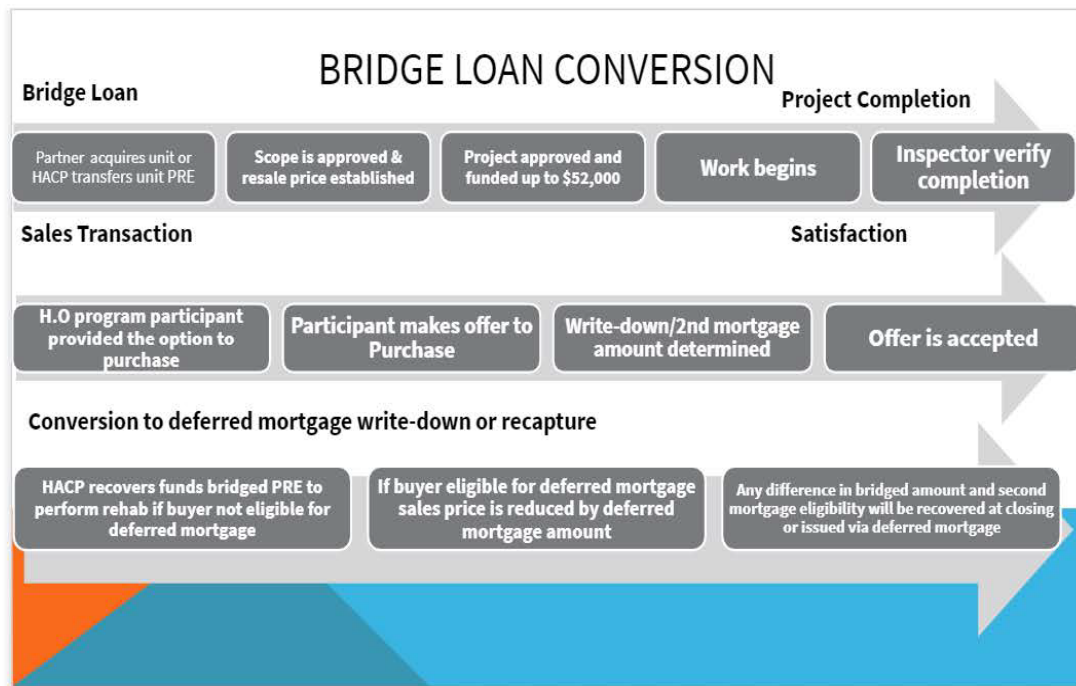
BRIDGE/ DEVELOPMENT LOAN CONVERSION:

- 1) The scope is developed, and resale price established by the review committee
- 2) Project approved and funded up to \$52,000
- 3) Partner acquires unit or the HACP transfers unit using partners PRE status
- 4) Inspectors verify completion

PURCHASE TRANSACTION:

- 1) Home Ownership Program Participants provided the option to purchase
- 2) The Participant makes an offer to purchase the unit,
- 3) Write down and/or deferred mortgage amount determined
- 4) Partner accepts the offer
- 5) The Participant continues with the HACP Home Ownership Program step-by-step guide

Please note: Participants may or may not be eligible for a second deferred mortgage, but they must have the purchasing capacity to purchase at the sales price - second mortgage eligibility.

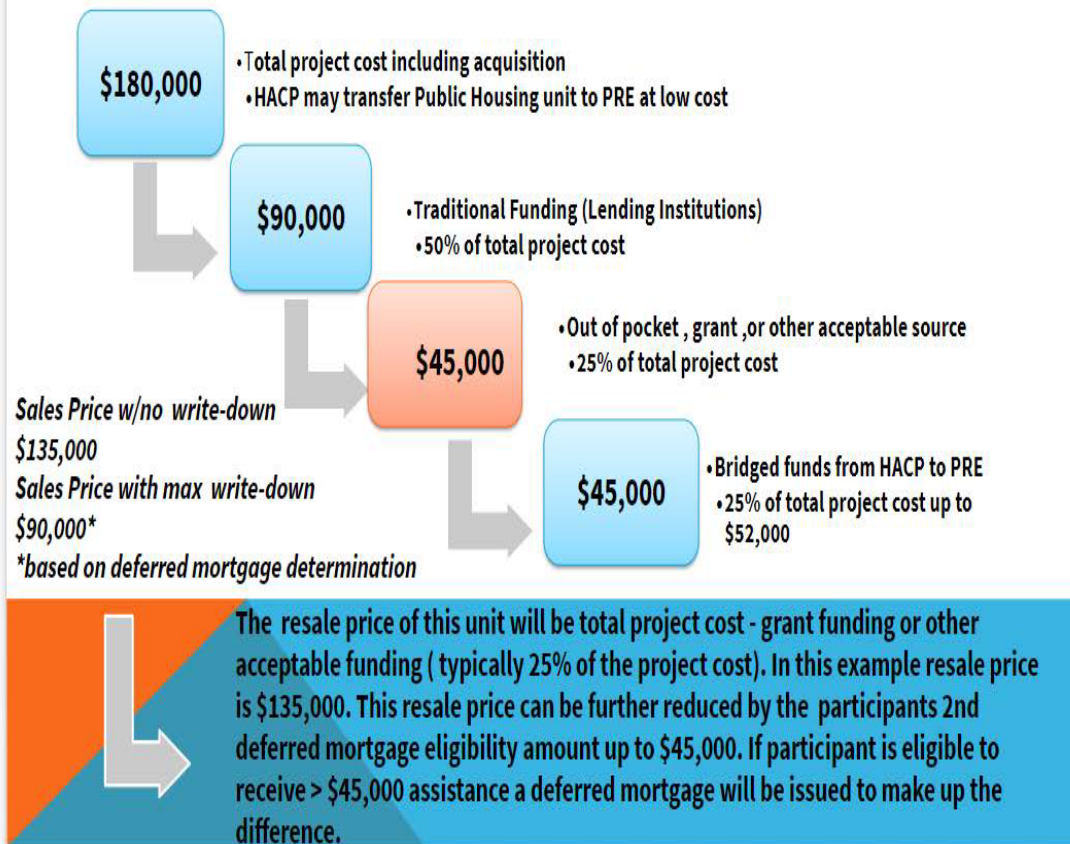


**G. EXAMPLE PROJECT FUNDING STRUCTURE :**

The resale price of this unit will be total project cost - grant funding or other acceptable funding (typically 25% of the project cost). In this example of a project costing \$180,000, the resale price is \$135,000. This resale price can be further reduced by the Participants' 2nd deferred mortgage eligibility amount up to the amount of the Bridge Loan issued to the partner. If the Participant is eligible to receive the amount bridged to the Partner additional assistance in the form of a deferred mortgage will be issued to make up the difference. If the Participant is eligible to receive less than the amount bridged to the Partner, the loan difference will be recovered by the HACP at the closing.



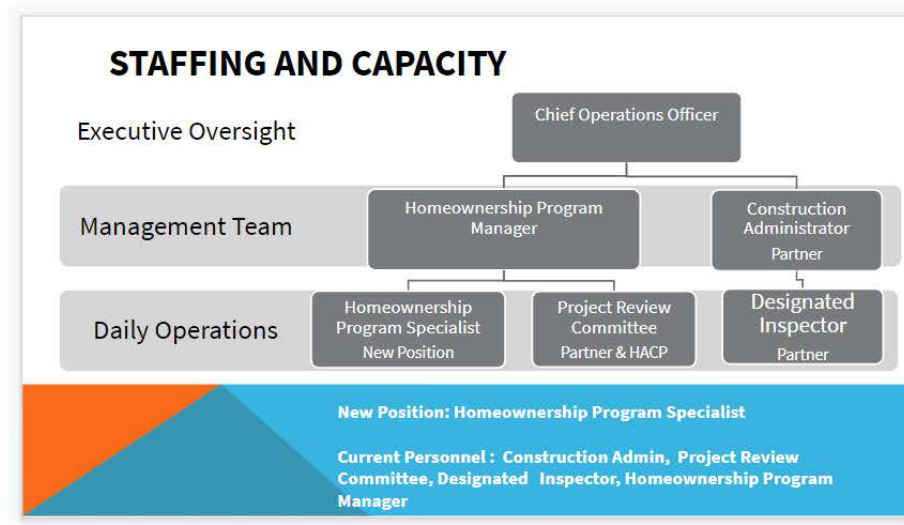
## PROJECT FUNDING STRUCTURE



## XVI. BRIDGE LOAN ADMINISTRATION AND IMPLEMENTATION PLAN:

### A. STAFFING:

- New Position Homeownership Program Specialist
- Current Personnel Construction Admin, Project Review Committee, Designated Inspector, Homeownership Program Manager



### B. IMPLEMENTATION TIMELINE:

- 1). **PROGRAM EXPANSION REVIEWED BY EXECUTIVE, LEGAL, AND FINANCE. (2-3 WEEKS)**
  - a) Board resolution in September 2020 to expand the Homeownership Program to include the origination of Development Bridge loans to PRE-Partners
- 2). **PARTNERS SELECTION PROCESS CREATED AND PERFORMED (UP TO 3 MONTHS)**
  - a) Construction admin and inspector responsibilities determined
  - b) Bridge loan review committee appointed
  - c) Homeownership Specialist hired
- 3). **SITE SELECTION (EARLY 2022)**
  - a) Existing HACP and Partner inventory reviewed first
- 4). **PROGRAM LAUNCHED (1ST QTR. 2022)**
  - a) No outside acquisitions in the pilot period of 12 months



## Appendix IV. MTW Activities Hardship Case Criteria

### Applicable to the Following MTW Activities:

- Activity #8: Modified Payment Standard Approval
- Activity #10: Local Payment Standard-Housing Choice Voucher Program

The HACP does not anticipate very many hardship requests for these activities. However, should the amount on the payment standard schedule decreases during the term of the HAP contract, the lower payment standard generally will be used beginning at the effective date of the family's second regular reexamination following the effective date of the decrease in the payment standard. In the HCV Administrative Plan, the HACP outlines the following steps on how it will determine the payment standard for the family:

**Step 1:** At the first regular reexamination following the decrease in the payment standard, the HACP will determine the payment standard for the family using the lower of the payment standard for the family unit size or the size of the dwelling unit rented by the family.

**Step 2:** The HACP will compare the payment standard from step 1 to the payment standard last used to calculate the monthly housing assistance payment for the family. The payment standard used by the HACP at the first regular reexamination following the decrease in the payment standard will be the higher of these two payment standards. The HACP will advise the family that the application of the lower payment standard will be deferred until the second regular reexamination following the effective date of the decrease in the payment standard.

**Step 3:** At the second regular reexamination following the decrease in the payment standard, the lower payment standard will be used to calculate the monthly housing assistance payment for the family unless the HACP has subsequently increased the payment standard, in which case the payment standard will be determined in accordance with procedures for increases in payment standards described below.

**Increases:** If the payment standard is increased during the term of the HAP contract, the increased payment standard will be used to calculate the monthly housing assistance payment for the family beginning on the effective date of the family's first regular reexamination on or after the effective date of the increase in the payment standard.

Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment standard until their next annual reexamination.

In accordance with PIH 2018-01, the HACP will send written notice to all families experiencing a payment standard reduction twelve (12) months before the effective date of the reduced payment standard amount.

**Applicable to the Following MTW Activity:**

- Propose Activity #1: Asset Exclusion & Self-Certification in HCV and Public Housing Programs

If a participant loses income from assets at any time and said loss affects the tenant portion of the rent, the participant may request an interim re-examination to adjust their rent calculation. Should a reduction in income due to loss of assets occur, normal interim re-examination policies will take effect and the reduction in asset income will be verified per the HUD Verification Hierarchy in PIH Notice 2018-18, only if the total household asset income is more than \$50,000.