

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

AHA may update its ACOP and Administrative Plan to add a policy allowing for opening and closing of public housing and S8 HCV waitlists for certain preferences only. If this policy is implemented, the AHA will clearly state in any public notices announcing the waitlist openings that only those eligible for the preference can apply. Preferences for PBV and RAD PBV waitlists may be added to the Administrative Plan to allow for those households impacted by RAD or other rehabilitation and modernization projects undertaken by a project owner that require displacement or temporary relocation to receive preference point priority. A chapter outlining RAD PBV policies will be added to the AHA Administrative Plan.

The waitlist for units at Carpenter Hill Homes will transition from a public housing waitlist to a Section 8 Project Based Voucher waitlist after the RAD conversion closing is complete. At that time, current applicants will be automatically moved from the public housing waitlist to the new PBV waitlist.

Substantial Deviation & Significant Amendment/Modification

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

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
 - b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
 - c. Changes to the number of each bedroom-type placed under HAP contract after conversion
 - d. If the conversion involved a transfer of assistance to a new location, changes to the location of the new site and plans for the original site following the transfer
 - e. Whether the project will adopt preferences after conversion
 - f. Whether the RAD conversion also involves a related Section 18 Disposition application, as long as such inclusion does not impact the number of units placed under HAP contract or the rights of impacted residents
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Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD

Arkadelphia Housing Authority (the “Authority”) will be converting the public housing developments listed below to a Section 8 Housing Assistance Payment (HAP) contract through the Rental Assistance Demonstration (RAD) under the guidelines of H 2019-09/PIH 2019-23, REV-4, as revised (the “RAD Notice”). RAD was designed by HUD to assist in addressing the capital needs of public housing by providing properties with a stable income stream and access, if needed, to new sources of capital to repair and preserve its affordable housing assets. As part of this conversion, the Authority may also seek HUD approval for a Disposition for a portion of the project under Section 18 of the U.S. Housing Act of 1937 (the Act), though such application will not impact resident rights or the units that will be preserved under a HAP contract

Below, please find specific information related to the Public Housing Development(s) proposed for RAD. Elements of this proposal are subject to change as plans develop, in consultation with residents:

Proposed Conversion of Carpenter Hill Homes AMP (includes Carpenter Hill Homes, South View, and Pine Court properties)

Development Name and Development Number(s) per PIC:	Carpenter Hill Homes (AMP) AR012000001	
Conversion Type:	☒ Project Based Voucher (PBV) ☐ Project Based Rental Assistance (PBRA)	
Estimated Conversion Date (month and year) (i.e., disposition timeline for a RAD/Section 18 Blend)	May 2027	
Current project designation:	☒ Family ☐ Elderly/Disabled ☐ Elderly-Only	
Is the project anticipated to have waiting list preferences after conversion:	☒ Yes ☐ No	<i>If yes, please describe:</i> <u>A waitlist preference will be considered for Carpenter Hill Homes, South View, and Pine Courts for applicants where the head of household, spouse, or co-head is a veteran or survivor of a veteran (honorable discharged) who actively served in a branch of the United States Armed Services or an active member of a branch of the United States Armed Services. The term survivor includes the spouse or widow of a veteran (unless remarried).</u> <u>A waitlist preference will be considered for South View for applicants where the head of household, spouse, or co-head</u>

		is 55 years of age or older at the time of the application.	
Will the conversion involve a transfer of the assistance to a new location?	☐ Yes ☒ No	<i>If yes, please describe:</i> 1) put the location if known, and # of units transferring 2) What the PHA plans to do with the original site following the transfer of assistance	
Estimated amount of Capital Funds to be used in the RAD Conversion (subject to future change)	\$ 0		
Estimated amount of Operating Reserves to be used in the RAD Conversion (subject to future change)	\$ 0		
After conversion, the annual Capital Fund grant is estimated to be reduced by:	\$ 250,000 (reduced to zero)		
We certify that the site complies with all applicable site selection requirements set forth at - 24 CFR § 983.55, for PBV conversions - Appendix III of the RAD Notice, for conversion to PBRA Further, the site complies with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, including implementing regulations at 24 CFR § 1.4(b)(3), Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR § 8.4(b)(5), and the Americans with Disabilities Act	☒ Yes ☐ No		
Is the Authority currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling?	☐ Yes, and compliance will not be negatively impacted by conversion activities. ☒ No		
Will the RAD conversion impact an existing Capital Fund Financing Program or Energy Performance Contract?	☐ Yes ☒ No	If yes, please describe the impact	
Is the PHA a Moving to Work agency and augmenting the RAD rents using voucher reserves as described in Section 1.6 or 1.7 of the RAD Notice	☐ Yes ☒ No	If yes, please include a statement explaining how the PHA will be able to maintain continued service level requirements.	
Bedroom Type	Number of Units Pre-Conversion	Estimated Number of Units Post-Conversion	Change
Studio/Efficiency	0	0	None
One Bedroom	36	36	None
Two Bedroom	34	34	None
Three Bedroom	30	30	None

Four Bedroom	0	0	None
Five Bedroom	0	0	None
Six Bedroom	0	0	None

Resident Rights, Participation, Waiting List and Grievance Procedures

Upon conversion, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in H-2016-17/PIH-2016-17 (RAD Civil Rights and Relocation Notice and:

☒ For conversions to PBV: Section 1.6 of the RAD notice

☐ For conversions to PBRA: Section 1.7 of the RAD Notice

Below, please find a table listing out each of the provisions affecting residents' rights and participation, waiting list and grievance procedures. The table lists out the provisions applicable to the type of conversion (PBV or PBRA) that the PHA is proposing, with reference to the Notice provisions that provide each tenant protections.

Tenant Right	Reference for Conversion to PBV	Reference for Conversion to PBRA
Tenant Protections Under the RAD Civil Rights and Relocation Notice (H 2016-17; PIH 2016-17)		
Resident Right to Return	Section 6.2	
Relocation Rights	Section 6.3-6.11	
Tenant Protections Under the RAD Notice (H 2019-09/PIH 2019-23, REV-4, as revised)		
No rescreening of tenants upon conversion	Section 1.6.C.1	Section 1.7.B.1
Establishment of Waiting List	Section 1.6.D.4	Section 1.7.C.3
Phase-in of tenant rent increase	Section 1.6.C.3	Section 1.7.B.3
Resident Participation and Funding	Section 1.6.C.5	Section 1.7.B.5
Family Self Sufficiency (FSS)	Section 1.6.C.4	Section 1.7.B.4
Resident Opportunity and Self Sufficiency Service Coordinators (ROSS-SC)	Section 1.5.G	Section 1.5.G
Jobs Plus	Section 1.6.C.8	Section 1.7.B.8
Earned Income Disregard	Section 1.6.C.7	Section 1.7.B.7
Choice-Mobility	Section 1.6.D.8	Section 1.7.C.5

When Total Tenant Payment Exceeds Gross Rent	Section 1.6.C.9	Section 1.7.B.9
Under-Occupied Unit	Section 1.6.C.10	Section 1.7.B.10
Termination notification	Section 1.6.C.6	Section 1.7.B.6
Grievance process	Section 1.6.C.6	Section 1.7.B.6

See Attachment # 1: PIH 2019-23, REV-4 Section 1.6.C & Section 1.6.D for provisions relating to PBV administration; and

See Attachment # 2 PIH-2016-17 for civil rights and relocation requirements.

Project Based Vouchers

AHA submitted a RAD application for the Carpenter Hill Homes AMP in April 2026; once the RAD conversion is completed, the project will have ~100 PBVs. AHA is contemplating the use of a RAD/Section 18 blend for Carpenter Hill Homes and therefore the PBVs at the site may be based on both RAD PBV and Section 18 TPV rental assistance under guidance in PIH Notice 2024-40 and the RAD Notice Rev 4 (and any amended/successor notices). AHA will administer the PBV HAP contracts.

AHA will be amending its administrative plan outlining RAD PBV policies to prepare for this specific project-based voucher application following RAD conversion.

Project basing these units is consistent with the goals of AHA's 5-Year Plan as it allows these properties to be repositioned through RAD (and/or RAD/Section 18 blends), providing AHA the opportunity to rehab these units to better serve their tenants while still maintaining these properties as affordable housing for families in the community earning at or below 80% AMI.

Commented [AS1]: A PHA administers HAP contracts. The money flows directly form HUD to the PHA because that's what an ACC means.

Commented [CM2R1]: Thanks for noting that error! It has been revised.

Section 18 Demolition and/or Disposition

AHA intends to pursue a RAD/Section 18 Small PHA Blend which will involve the disposition of 90% of units in the Carpenter Hill Homes AMP to receive TPVs under the Section 18 program.

Additionally, AHA is contemplating pursuing a Section 18 disposition for a parcel of land located on the ~~southwestern~~ southern portion of the Carpenter Hill Homes site. The parcel contains ~~two~~ three non-dwelling buildings (the AHA administrative office, ~~and~~ a maintenance facility, ~~and a storage shed~~) and does not include any residential units.

Preliminary property surveys indicate that the southwestern corner of the non-dwelling parcel lies within a FEMA-designated floodplain which may adversely affect the property's eligibility for tax credits. To address this concern, AHA is evaluating the removal of this parcel and the associated non-dwelling structures from the RAD conversion and tax credit application. In lieu of including the parcel in the conversion, AHA is considering pursuing a Section 18 disposition.

If AHA proceeds with a Section 18 disposition for this non-dwelling parcel, it anticipates relying on HUD's disposition criteria for non-dwelling buildings as outlined in 24 CFR 970.17(d). AHA expects that this action would involve a below fair market value disposition of the property to the Housing Authority's non-profit entity. The non-dwelling buildings would continue to support AHA residents and facilitate ongoing administrative and maintenance operations following the conversion.

AHA will continue to evaluate options for the non-dwelling parcel and will keep residents and the Board informed as decisions are made regarding whether to pursue Section 18 disposition or to include the parcel in the RAD/Section 18 Blend transaction.