

Trenton Housing Authority
FY2026 - 2030
Five Years Plan

5-Year PHA Plan (for All PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 09/30/2027
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services. They also inform HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-, very low-, and extremely low- income families.

Applicability. The Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs. PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they closeout their Section 9 programs (ACC termination).

A.	PHA Information.
A.1	<p>PHA Name: <u>Housing Authority of the City of Trenton</u> PHA Code: <u>NJ005</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2026</u> The Five-Year Period of the Plan (i.e. 2019-2023): <u>2026-2030</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Public Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans.</p> <p>The Trenton Housing Authority will have a complete 5 Year / Annual Plan in the Administration Building at 875 New Willow Street, available for review. The plans will also be on the Trenton Housing Authority's website, http://www.tha-nj.org/about.</p>

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Plan Elements. Required for all PHAs completing this form.

B.1 Mission. State the PHA's mission for serving the needs of low-, very low-, and extremely low-income families in the PHA's jurisdiction for the next 5 years.

The Trenton Housing Authority (THA) is committed to providing decent, safe and sanitary affordable housing that is well constructed, carefully maintained and expertly managed. We seek to identify projects that have the potential to act as a catalyst for the revitalization of neighborhoods in the City of Trenton. We promote self-sufficiency among the families that reside in our communities by partnering with local agencies and organizations to provide education, training, employment and business opportunities.

B.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next 5 years.

PHA Goals:

Expand the supply of assisted housing: The THA will increase the availability of decent, safe, and affordable housing by:

- Redeveloping its Frazier Court II (formerly Campbell Homes) property, currently vacant and non-performing, redevelopment will be conducted in accord with HUD's Rental Assistance Demonstration Program (RAD) and the conversion of Prospect Village and Frazier Court I to the RAD funding platform.
- The THA plans on developing a Homeownership program.
- THA and Development partners will complete the first three Phases of the Transformation Plan for the CHOICE Neighborhood Implementation grant. This transformation plan in the North Trenton Battle Monument neighborhood intends to increase affordable housing.
- Apply for supplemental Choice Implementation grant funding to complete the remaining phases of the CNI.
- Establish a Housing Choice Voucher (Section 8) Program and/or consolidation with another PHA to increase program offerings.

Improve the quality of assisted housing: The THA will improve the quality of assisted housing by:

- Increase key performance indicators in property management and PHAS scores year over year in operations to remove Troubled Status.
- Streamline operations processes to incorporate technology that provides our residents with greater flexibility in complying with program requirements.
- Improve communication efficiency between management and residents.
- Invest in building team capacity through ongoing training for our team members, ensuring they have the necessary knowledge and tools to meet program requirements and improve the resident experience.
- Refine Standard Operating Procedures to ensure that preventative maintenance and work orders are being performed in a timely manner with quality workmanship.
- Implement an aggressive Quality Control Program for work orders and unit reconditioning and rehabilitation.
- Review standard materials list to ensure that the most cost efficient, durable and aesthetically pleasing materials are being utilized.
- Continue to pursue the conversion of THA properties to a Section 8 Funding platform under HUD's Rental Assistance Demonstration (RAD) program.

Provide an improved living environment:

- Upgrade community space and common areas and add amenities where feasible.
- Install landscape and parking improvements throughout all THA properties.
- Install new building entry doors and electronic key systems at all three-story walk-up buildings.
- Upgrade video surveillance system throughout all THA properties (e.g. replace existing obsolete cameras, identify areas for installation of new cameras).
- Continue with an aggressive lease enforcement actions surrounding quality of life issues (e.g. littering, illegal dumping, unauthorized parking, poor housekeeping)

To promote self-sufficiency among THA families:

- Promote independence, self-sufficiency, and goal setting among THA residents through the Family Self-Sufficiency Program (FSS)
- Link residents to employment and education opportunities
- Provide opportunities to residents to pursue careers in construction and related fields
- Promote homeownership and financial literacy
- Promote healthy and active lifestyles
- Increase enrollment in early childhood education
- Pursue grants that aid the improvement and development Family Self-Sufficiency (e.g. Jobs Plus, VAWA Prevention, etc)

To ensure equal opportunity in housing for all Americans:

- THA will undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability. This will be done through training of staff.
- THA will undertake affirmative measures to ensure accessible housing is available to persons with all varieties of disabilities regardless of unit size required.

B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

THA continues to move forward meeting/achieving its Mission, Goals and Objectives:

Toward the goal of increasing the supply of affordable housing, the THA has done the following:

- Secured a \$19.12 million Choice Neighborhood Implementation grant for the Donnelly Homes North Trenton Battle Monument neighborhood. This neighborhood plan will replace current dated public housing stock and add affordable housing rentals totaling 639 units and 37 homeownership units throughout the North Trenton Neighborhood.
- Procured a development partner for the redevelopment / demolition and new development of Frazier Court II (formerly Campbell Homes) and the conversion to RAD funding platform for Prospect Village and Frazier Court I.

Toward the goal of improving the quality of assisted housing the THA has done the following:

- Upgraded community spaces and common areas at Abbott, French and Josephson Apartments and added amenities to Prospect Village community space for STEM Innovation.
- Upgraded several video surveillance system throughout all THA properties (i.e., replaced existing obsolete cameras, identified areas for installation like new cameras in the hallways at Senior Buildings).
- Established aggressive lease enforcement actions surrounding quality of life issues (i.e., littering, illegal dumping, evictions of long-term debt holders).
- Upgraded the Agency's enterprise software system.
- New door hardware and security cameras in laundry rooms.
- Implemented quality control standards that improved resident relations and reduced tenant complaints.
- Updated policies and streamlined processes to ensure regulatory compliance.

Toward the goal of promoting self-sufficiency, the THA has done the following:

- Received a HUD Family Self Sufficiency Program Coordinator grant. The Family Self-Sufficiency Program (FSS) is a program that promotes independence, self-sufficiency, and goal setting among THA residents. The FSS program currently has 32 families enrolled in the program and two families graduated and purchased their first home.
- The THA has a very active Resident and Community Services department that has partnered with several local supportive services organizations to focus on providing education, youth education and recreation, community empowerment, workforce elevation, and local business partnership. The THA has implemented an aggressive Section 3 program designed to ensure that residents benefit from dollars being spent in connection with THA projects and programs.

Toward the goal of improving the living environment, the THA has done the following:

- Renovated and installed new equipment in laundry rooms at Lincoln, French, Frazier, Prospect Village, Abbott, and Josephson properties.
- Secured over 70 vacant units utilizing DAWG systems (Door And Window Guards). This promoted less negative traffic and promoted a better quality of life for our tenants.
- Modernized elevators and replacement major components at Abbott Apartments, Josephson Apartments and French Towers.
- Cleaned, sealed, and conducted brick-pointing on the exterior of French Towers to prevent water leaks from storms
- Repaired or replaced roof exhaust fans at Abbott Apartments, Josephson Apartments and French Towers. To improve the air quality and place less stress on the heating and air conditioning systems.
- Replaced roofing across multiple buildings across the Lincoln Homes property.
- Cleaned and deodorized the trash chutes and compactor rooms, at the senior buildings. Repaired or replace damage chute doors at French towers.
- Supplied an aggressive fan coil, duct, and vent cleaning in every apartment in the senior building.
- Cleaned and sealed all HVAC lines at Frazier Court to promote the longevity of the unit systems.
- Partnered with the City of Trenton to upgrade Radio Towers and New Hand-Held Radios for Security and Maintenance Staff
- Implemented quality control standards that improved resident relations and reduced tenant complaints.
- Updated policies and streamlined processes to ensure regulatory compliance.

Toward the goal of ensuring equal opportunity in housing for all Americans, the THA has established a regular training schedule for its staff in the areas of fair housing, program compliance, VAWA, and equal opportunity.

B.4

Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of survivors of domestic violence, dating violence, sexual assault, or stalking.

Violence Against Women Act (VAWA)

Violence Against Women Act (VAWA) requires PHAs to describe any goals, objectives, policies or programs that enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault or stalking. The THA supports the goals and objectives of VAWA and will comply with its requirements.

THA Safety Staff will respond immediately to all reports of domestic violence and immediately notify Police, Public Housing Managers and Resident Services of such acts of violence and request appropriate protections and services.

The THA has completed a full review and revision of its Public Housing Admissions and Continued Occupancy Policy (ACOP) and Public Housing Lease in accordance with PIH-2017-08 notice, Violence Against Women Reauthorization Act of 2013. The THA has amended its lease to include the lease addendum for Violence Against Women and Justice Department Reauthorization Act of 2005. No perspective tenant that is the victim of domestic violence will be denied housing or no tenant will be evicted for same.

The THA has partnered with Womanspace to provide ongoing training to THA staff. The Womanspace Community Education provides speakers for civic associations, community and faith-based organizations, businesses, schools and others who are interested in understanding interpersonal abuse and violence. By learning more about the issues, community members can become an integral part of the coordinated community response necessary to support victims and hold abusers accountable for their actions.

B.5	Project-Based Activities. If a PHA intends to select one or more projects for project-based assistance without competition in accordance with 24 CFR 983.51(c), the PHA must include a statement of this intent. N/A
C. Other Document and/or Certification Requirements.	
C.1	Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. See Attached C.1

<p>C.2</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p>C.3</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.4</p>	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>

ATTACHMENT C.1

Significant Amendments / Modifications

PHA Plan Amendment

Significant Amendment: Rental Assistance Demonstration (RAD) Project Based Voucher Conversions

The Trenton Housing Authority is amending its (annual and/or 5-year) PHA Plan because it has applied to HUD to be an applicant in the Rental Assistance Demonstration (RAD). If the Trenton Housing Authority is successful, as a result, the application the Trenton Housing Authority will be converting to Project Based under the guidelines of H 2019-09/PIH 2019-23 (HA), REV-4 and any successor Notices. Upon conversion to Project Based Vouchers the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of H 2019-09/PIH 2019-23 (HA), REV-4; and H-2016-17/PIH-2016-17.; These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the Trenton Housing Authority certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Trenton Housing Authority with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Trenton Housing Authority may also borrow funds to address their capital needs. The Trenton Housing Authority for its **Donnelly Homes site** will not be contributing Operating Reserves, and it will contribute 2.5 million dollars of Capital Funds towards the **Donnelly Homes site** conversion, and/or Replacement Housing Factor (RHF) Funds allocated to the Trenton Housing Authority, if any, towards the conversion. The Trenton Housing Authority has debt under the Capital Fund Financing Program. This debt **will be** paid in full by the end of 2025 through its normal payments.

This proposed amendment provides additional information as required by HUD concerning The Trenton Housing Authority's RAD portfolio conversion plans. It is the Trenton Housing Authority's intention to incorporate this proposed amendment in its entirety into the next annual plan. Further, the Trenton Housing Authority notes that the intention to convert under RAD to PBV for Donnelly Homes is part of a HUD approved Choice Neighborhood Implementation Grant. It has been discussed at multiple Resident Advisory Board Meetings (RAB) meetings and contained within the resulting annual plan submission. The Trenton Housing Authority held multiple meetings at Donnelly Homes Community Room where the RAD conversion was reviewed as part of the Choice Neighborhood redevelopment.

Below, please find specific information on public housing development(s) selected for RAD:

Development #1

<u>Name of Public Housing Project:</u> Donnelly Homes	<u>PIC Development ID:</u> NJ005000003	<u>Conversion type:</u> PBV	<u>Transfer of Assistance:</u> Up to 88 units
Total Units:	Pre- RAD Unit Type (i.e., Family, Senior, etc.):	Post-RAD Unit Type if different (i.e., Family, Senior, etc.)	Capital Fund allocation of Development:
376	Family	Family units 271 Senior units 105	\$2.5 million total for conversion period and The amount attributed to this project for purposes of future RAD rent calculations
Bedroom Type	Number of Units Pre-Conversion:	Number of Units Post-Conversion:	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.): Unit configurations are changing to match household. All units will be replaced
	376	376	
Studio/Efficiency	0	0	0
One Bedroom	156	160	+4
Two Bedroom	176	141	-35
Three Bedroom	44	68	+24
Four Bedroom	0	7	+7
Five Bedroom	0	0	0
Six Bedroom	0	0	0
<u>(If performing a Transfer of Assistance):</u>	(Explain any changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted) The Choice Neighborhood development is being developed in up to 6 phases. One phase is a senior phase which will be for households 62 and over, The remaining 5 phases will remain family. Up to 88 units will be developed by others outside the CNI neighborhood (Transfer of Assistance). These 88 units may ultimately be developed through the traditional Section 8 PBV program. The units will be within 25 miles of the CNI neighborhood.		

The RAD conversion of Donnelly Homes will take place in up to six phases as it is part of the Donnelly Homes Choice Neighborhood Implementation Grant redevelopment plan. All replacement units will be newly constructed. The existing units at Donnelly Homes will be demolished. The units will be replaced in each phase as follows:

REPLACEMENT UNITS	1 BED UNIT	2 BED UNIT	3 BED UNIT	4 BED UNIT	TOTAL UNITS
Phase 1 family	105	0	0	0	105
Phase 2 senior	39	35	2	3	79
Phase 3 family	6	21	8	2	37
Phase 4 family	5	20	7	1	33
Phase 5 family	5	21	7	1	34
Phase 6 Family	0	44	44	0	88
Total Replacement Units	160	141	68	7	376

In addition to replacing all 376 public housing units with 376 PBVs, the redevelopment will include an additional 226 affordable rental units and 37 market rate rental units. Bedroom configurations listed in the above chart may be modified to reflect the needs of the existing Donnelly Homes residents with respect to their relocation needs as well as wait list needs.

The PHA intends to use the RAD Section 18 RAD Blend in the redevelopment.

PBV Resident Rights and Participation

1. No Rescreening of Tenants upon Conversion. Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.³ Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, Section 8(o)(4) of the 1937 Act and 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, HUD waives Section 8(o)(4) and 24 CFR § 982.201 to the extent necessary for this provision to apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR Part 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.¹

¹ These protections (as well as all protections in this Notice for current households) also apply when a household is relocated to facilitate new construction or repairs following conversion and subsequently returns to the Covered Project.

2. Right to Return. See Section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

3. Phase-in of Tenant Rent Increases. If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10 percent or \$25, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "Calculated PBV TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1 (the first recertification following conversion), as illustrated below.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full Calculated PBV TTP

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP

- Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications – Full Calculated PBV TTP

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

4. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Public Housing residents that are currently FSS participants will continue to participate in the PHA's FSS program. The PHA may continue to use any FSS funds already awarded to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.² Further upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

² The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

For information on FSS PIC reporting requirements for RAD conversions, see Notice PIH 2016-08 at <http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016-08.pdf>.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a non-profit or local Resident Association and this consequence of a RAD conversion may impact those entities.

5. Resident Participation and Funding. In accordance with Attachment 1B, residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

6. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum (HUD Form 52530-c), as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

- i. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD and to non-RAD PBV units located at the Covered Project. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:
 - a. A reasonable period of time, but not to exceed 30 days:
 - i. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - ii. In the event of any drug-related or violent criminal activity or any felony conviction;
 - b. Not less than 30 days in the case of nonpayment of rent; and

- c. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such a shorter period shall apply.
- ii. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For termination of assistance and several other PHA determinations, PBV program rules require the PHA to provide an opportunity for informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v),³ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
 - ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.
- b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
- c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- d. The Project Owner provides an opportunity for an informal hearing before an eviction.

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

³ § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Same Covered Project shall be subject to the terms of this provision.

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

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 24 CFR § 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenants (e.g., tenants that move into the property following conversion or tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Same Covered Project shall be subject to the terms of this provision.

8. Jobs Plus. Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance at that site unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project. Job Plus is not applicable to the Trenton Housing Authority.

9. When Total Tenant Payment Exceeds Gross Rent. Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds

the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice.⁴ In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Same Covered Project shall be subject to the terms of this provision.

Unless a waiver is requested and approved as described below, any new admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has left the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating units have been permitted, Section 1.6.B.10 of the Notice.

A PHA may request a waiver from HUD for the Covered Project in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not made a housing assistance payment for a family in 180 days.

For a Covered Project that consists of 100 percent RAD PBV units, the PHA must demonstrate that a waiver is necessary in order to avoid an undue concentration of poverty at the Covered Project. A PHA may evidence this by providing data showing, for example:

- how eligible income-certified applicants on the waiting list must be passed over because their incomes result in zero HAP at admission causing a higher concentration of poverty at the covered project: or

⁴ For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

- how the income of newly admitted families is causing a markedly higher concentration of poverty than the PHA's non-RAD PBV Projects.

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

For any other Covered Project, the PHA must demonstrate that the property contains specific units (e.g., units suitable for large families or accessible units) for which there are insufficient alternative housing opportunities.

If the waiver is approved, the new admission[s] families covered under the waiver are participants under the program and all the family obligations and protections under RAD and PBV apply to the family, and the unit is subject to all program requirements. Such waiver requests should be submitted to the PIH Field Office in accordance with Notice PIH 2018-16.

10. Under-Occupied Unit. If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR § 983.260 is waived for current residents remaining or returning to the Covered Project. MTW agencies may not modify this requirement. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

PBV: Other Miscellaneous Provisions

- 1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
- 2. Ongoing PHA Board Review of Operating Budget.** The Owner must submit to the administering PHA's Board the operating budget for the Covered Project annually. The PHA's Board must confirm that the Project Owner is making deposits into the Reserve for

Replacement account in accordance with the RCC as well as assessing the financial health of the Covered Project.⁵

3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** This section has been moved to 1.4.A.13 and 1.4.A.14.
4. **Establishment of Waiting List.**

24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:

- i. Transferring an existing site-based waiting list to a new site-based waiting list.
- ii. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
- iii. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
- iv. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

⁵ For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of monitoring and evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).⁶

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

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

- 5. Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from

⁶ For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.

6. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC, but HUD review of liens must be performed prior to execution.
7. **Administrative Fees for Public Housing Conversions During the Year of Conversion .** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds. For example, if the project’s assistance converts effective July 1, 2015, the public housing ACC between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV HAP Contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.

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

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

8. **Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant-based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing the following alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD: The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventor turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households are received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) of the Act and 24 CFR § 983.261(c). Please note that this alternative requirement does not apply to PBVs entered outside of the context of RAD. MTW agencies may not alter this requirement.

9. **Reserve for Replacement.** The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account or similar instrument, as approved by HUD, where funds will be held by the Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines.
10. **Initial Certifications and Tenant Rent Calculations.** The Contract Administrator uses the family's public housing tenant rent (reflected on line 10f of the family's most recent HUD Form 50058) at the date of the conversion to calculate the PBV HAP and tenant rent until the effective date of the earlier of the family's first regular or interim recertification following the date of conversion. At the earlier of the family's first regular or interim recertification, the Contract Administrator will use the family's TTP based on the recertification and the HCV utility allowance (or the PBV site-specific utility allowance, if applicable) to determine the PBV HAP and tenant rent. This means that the family pays

the same tenant rent as the family was paying under the public housing program until the earlier of first regular or interim reexamination following conversion, at which point the normally applicable PBV calculation for the tenant rent becomes effective. (Under the PBV program, the monthly HAP is the rent to owner minus the tenant rent, and the tenant rent is the family TTP minus the utility allowance.) To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same property as the Covered Project shall be subject to the terms of this provision. To effectuate this provision, HUD is waiving 24 CFR 5.601 and 983.3(c)(6)(iii).

The Trenton Housing Authority is not proposing any transfer of assistance at the time of conversion.

The Trenton Housing Authority is not currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and an assurance that compliance will not be negatively impacted by conversion activities.

The Trenton Housing Authority certifies that the RAD conversion complies with all applicable site selection and neighborhood reviews standards and that all appropriate procedures have been followed.

All other required information and certifications necessary to submit a Significant Amendment to the PHA Plan, including Resident Advisory Board comments and responses, challenged elements, and all required certifications have been complied with.

The Trenton Housing Authority shall not consider any of the following to be a Substantial Deviation from the PHA Plan: The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance; 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; Changes to the construction and rehabilitation plan for each approved RAD conversion; and Changes to the financing structure for each approved RAD conversion

Attachment: Joint Housing/PIH Notice H-2016-17/PIH-2016-17

ATTACHMENT C.2

Resident Advisory Board (RAB)



Clifford Godfrey
Executive Director

The Trenton Housing Authority's senior management convened a meeting with the Resident Advisory Board (RAB) on Wednesday, August 20, 2025. The purpose of the meeting was to review the Authority's programs, initiatives, and strategic plans for 2026 and the subsequent five-year period (2026-2030). Key updates were provided on the North Trenton Battle Monument Choice Neighborhood Implementation Project and Frazier Court II.

The RAB representatives concluded the meeting by expressing satisfaction with the Authority's direction and did not present any significant comments regarding the plan.

Clifford Godfrey
8/20/25

ATTACHMENT C.3

Certification by State or Local Officials

Form HUD 50077-SL

**Certification by State or Local
 Official of PHA Plans Consistency
 with the Consolidated Plan or
 State Consolidated Plan
 (All PHAs)**

U. S Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
Expires: 09/30/2027

**Certification by State or Local Official of PHA Plans
 Consistency with the Consolidated Plan or State Consolidated Plan**

I, W. Reed Gusciora, the Mayor
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years 2026-2030 and/or Annual PHA Plan for fiscal
 year 2026 of the Housing Authority of the City of Trenton is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including any applicable fair housing goals or
 strategies to:

City of Trenton
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR Part 903.15.

**Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
 State Consolidated Plan.**

The Trenton Housing Authority (THA) Five Year / Annual Plan is consistent with the City
of Trenton's goals and mission to provide decent, safe and affordable housing for the
residents of the city. In addition, THA and the City share a common goal to improve the
quality of life for residents of the City of Trenton.

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, 1014; 31 U.S.C. §3729, 3802).

Name of Authorized Official: W. Reed Gusciora	Title: Mayor
Signature:	Date:

This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions,
 searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding
 this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE,
 Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB
 Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB
 Control Number.

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



PUBLIC NOTICE

The Housing Authority of the City of Trenton (THA) invites the public to an informational meeting regarding its 2026-2030 Five-Year & 2026 Annual Plan. This hybrid meeting will take place on Tuesday, September 2, 2025, at 2:00 PM. Attendees can join in person at the THA Administration Building or virtually via the link provided below. Please email any questions to administration@tha-nj.org at least 48 hours before the meeting.



<https://tinyurl.com/2kakw56s>

THA Administration Building
875 New Willow Street, Trenton, NJ 08638

A DRAFT COPY OF THE ANNUAL PLAN IS AVAILABLE FOR REVIEW ON THE WEBSITE, www.tha-nj.org, IN THE ADMINISTRATION OFFICE AND AT THE HOUSING PROPERTY SITE MANAGEMENT OFFICES AFTER AUGUST 21, 2025.

Trenton Housing Authority
FY2026
Annual Plan

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 9/30/2027
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services. They also inform HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-, very low-, and extremely low- income families.

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA **do not** need to submit this form. Note: PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they closeout their Section 9 programs (ACC termination).

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or HCVs combined and is not PHAS or SEMAP troubled.

A. PHA Information.	
A.1	<p>PHA Name: Trenton Housing Authority PHA Code: NJ005</p> <p>PHA Type: <input type="checkbox"/> Standard PHA <input checked="" type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2026</p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units ¹⁴²³ Number of Housing Choice Vouchers (HCVs) _____</p> <p>Total Combined Units/Vouchers _____</p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Public Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans.</p> <p>The Trenton Housing Authority will have a complete Annual Plan in the Administration Building at 875 New Willow Street, available for review. The plans will also be on the Trenton Housing Authority's website, http://www.tha-nj.org/about.</p>

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Plan Elements

B.1 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs.
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification.

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

See attached B.1(b)

(c) The PHA must submit its Deconcentration Policy for Field Office review.
See attached B.1(c)

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's applicable Fiscal Year?

- | Y | N | |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Choice Neighborhoods Grants. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Modernization or Development. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Demolition and/or Disposition. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Designated Housing for Elderly and/or Disabled Families. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Conversion of Public Housing to Tenant-Based Assistance. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Homeownership Program under Section 32, 9 or 8(Y) |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Occupancy by Over-Income Families. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Occupancy by Police Officers. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Non-Smoking Policies. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Project-Based Vouchers. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Units with Approved Vacancies for Modernization. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). |

(b) If any of these activities are planned for the applicable Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

B.2 New Activities

Choice Neighborhoods / Mixed Finance Modernization or Development

The Trenton Housing Authority will conduct an authority-wide portfolio analysis of its housing stock. THA will then develop plans to modernize and / or preserve its housing stock. THA will look into all available sources of funding including local, state, and federal programs. These programs include but are not limited to the CHOICE Neighborhood Grant, Moving to Work Demonstration, Federal Home Loan Bank (FHLB-AHP), New Jersey Low Income Housing Tax Credits (LIHTC), CDBG, HOME and the Rental Assistance Demonstration (RAD) programs.

Demolition and/or Disposition

Frazier Court II (Campbell Homes Project)

The THA procured development partners for the Donnelly Homes and Prospect, Frazier, and Campbell Homes developments. All of these developments will either consist of new construction and/or Rental Assistance Demonstration (RAD) conversion. As a result, the THA may pursue a demolition and / or disposition applications approvals from HUD's SAC for all these developments.

Conversion of Public Housing to Project-Based Assistance under RAD

The THA anticipates submitting RAD applications, which will allow the THA to reserve RAD conversion for Prospect Village, Frazier Courts, Lincoln Homes, Wilson Homes, and Haverstick Homes developments as well as the three senior/disabled apartment buildings.

Occupancy by Police

The City of Trenton has an emphasis on public safety. In partnering with the City of Trenton there may be opportunities of leasing public housing units to police officers for the purpose of increasing security for public housing residents.

Trenton Community Street Teams (TCST) is a community-based violence reduction initiative that complements traditional policing strategies with public health approaches, including relationship-based direct intervention, mentoring, and case management. The program helps community members most at risk of becoming a victim or perpetrator of violence connect to needed services and supports, mediate disputes, safely travel to and from school, and feel more connected to and involved with their communities. The TCST is funded through a grant provided by the Department of Community Affairs, modeled after a successful program in Newark and will create its first hub in Donnelly Homes.

Units with Approved Vacancies for Modernization

The Trenton Housing Authority has approximately 30 vacant units that are targeted for modernization. The THA will modernize and occupy these units in 2026.

Other Capital Grant Programs

The Trenton Housing Authority will apply for any capital funding grants that we are eligible for as they become available such as Emergency Safety and Security Grant, Jobs Plus Initiative Grant, Choice Neighborhood Implementation Grant, Family Self-Sufficiency, etc.

Progress Report.

B.3

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. THA continues to move forward meeting/achieving its Mission, Goals and Objectives:

Toward the goal of increasing the supply of affordable housing, the THA has done the following:

- Secured a \$19.12 million Choice Neighborhood Implementation grant for the Donnelly Homes North Trenton Battle Monument neighborhood. This neighborhood plan will replace current dated public housing stock and add affordable housing rentals totaling 639 units and 37 homeownership units throughout the North Trenton Neighborhood.
- Procured a development partner for the redevelopment / demolition and new development of Frazier Court II (formerly Campbell Homes) and the conversion to RAD funding platform for Prospect Village and Frazier Court I.

Toward the goal of improving the quality of assisted housing the THA has done the following:

- Upgraded community spaces and common areas at Abbott, French and Josephson Apartments and added amenities to Prospect Village community space for STEM Innovation.
- Upgraded several video surveillance system throughout all THA properties (i.e., replaced existing obsolete cameras, identified areas for installation like new cameras in the hallways at Senior Buildings).
- Upgraded the Agency's enterprise software system.
- New door hardware and security cameras in laundry rooms.

Toward the goal of promoting self-sufficiency, the THA has done the following:

- The FSS program currently has 32 families enrolled in the program and two families graduated and purchased their first home.
- The THA has a very active Resident and Community Services department that has partnered with several local supportive services organizations to focus on providing education, youth education and recreation, community empowerment, workforce elevation, and local business partnership. The THA has implemented an aggressive Section 3 program designed to ensure that residents benefit from dollars being spent in connection with THA projects and programs.

Toward the goal of improving the living environment, the THA has done the following:

- Renovated and installed new equipment in laundry rooms at Lincoln, French, Frazier, Prospect Village, Abbott, and Josephson properties.
- Secured over 70 vacant units utilizing DAWG systems (Door And Window Guards). This promoted less negative traffic and promoted a better quality of life for our tenants.
- Modernized elevators and replacement major components at Abbott Apartments, Josephson Apartments and French Towers.
- Cleaned, sealed, and conducted brick-pointing on the exterior of French Towers to prevent water leaks from storms
- Repaired or replaced roof exhaust fans at Abbott Apartments, Josephson Apartments and French Towers. To improve the air quality and place less stress on the heating and air conditioning systems.
- Replaced roofing across multiple buildings across the Lincoln Homes property.
- Updated policies and streamlined processes to ensure regulatory compliance.

Toward the goal of ensuring equal opportunity in housing for all Americans, the THA has established a regular training schedule for its staff in the areas of fair housing, program compliance, VAWA, and equal opportunity.

B.4 Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
Capital fund 5YAP was approved for 2025-2029 on 5/28/2025. We also did a revision to this plan which was approved on 8/20/2025.

B.5 Most Recent Fiscal Year Audit.

(a) Were there any findings in the most recent FY Audit?

Y N

(b) If yes, please describe:

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) have comments to the PHA Plan?

Y N

(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

<p>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See attached C.2</p>
<p>C.3</p>	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See attached C.3</p>
<p>C.4</p>	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>

C.5 Troubled PHA.

(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?

Y N N/A

(b) If yes, please describe:

Under the United States Housing Act of 1937 ("Act"), as amended, 42 U.S.C. § 1437 et seq., HUD is responsible for administering low-income housing programs, and pursuant to the Act, HUD has entered into an Annual Contributions Contract ("ACC") with Trenton Housing Authority to develop and operate public housing projects of Trenton Housing Authority,

As of March 3rd 2025, based on 2022 PHAS Assessment, Trenton Housing Authority has been designated "Troubled" pursuant to section 6(j)(2) of the Act, 42 U.S.C. § 1437d, and 24 C.F.R. part 902, for financial, physical and/or management indicators.

See Attachment C.5 Troubled PHA

ATTACHMENT C.5
TROUBLED PHA – SIGNED AGREEMENT

Recovery Agreement between the Trenton Housing Authority
And
the United States Department of Housing and Urban Development

This Recovery Agreement (“Agreement”) is entered into between the Trenton Housing Authority and the United States Department of Housing and Urban Development (“HUD”) as of this 3rd day of March, 2024 (the “Effective Date”).

RECITALS

WHEREAS, under the United States Housing Act of 1937 (“Act”), as amended, 42 U.S.C. § 1437 *et seq.*, HUD is responsible for administering low-income housing programs, and pursuant to the Act, HUD has entered into an Annual Contributions Contract (“ACC”) with Trenton Housing Authority to develop and operate public housing projects of Trenton Housing Authority; and

WHEREAS, pursuant to the Act, HUD must evaluate public housing performance and has instituted the Public Housing Assessment System (“PHAS”); and

WHEREAS, Trenton Housing Authority received a failing PHAS score of 46 for the fiscal year ending 12/31/2022 (the “2022 PHAS Assessment”); and

WHEREAS, based on its 2022 PHAS Assessment, Trenton Housing Authority has been designated “Troubled” pursuant to section 6(j)(2) of the Act, 42 U.S.C. § 1437d, and 24 C.F.R. part 902, for financial, physical and/or management indicators, or other such deficiencies as HUD has identified; and

WHEREAS, the 2022 PHAS Assessment reflects a failing financial sub-indicator (9 points (of 25); and

WHEREAS, the 2022 PHAS Assessment reflects that low occupancy rates at some Trenton Housing Authority properties warrant significant improvements, including Prospect Village (93%), Wilson Holmes (89%), Donnelly Homes (90%), and Josephson Apartments (89%); and

WHEREAS, the 2022 PHAS Assessment reflects a high tenant accounts receivable (“TAR”) of 16.7% and excessive TARs at some properties, including Prospect Village (20%), Wilson Homes (21%), Donnelly Homes (24%), and Josephson Apartments (9%); and

WHEREAS, the 2022 PHAS Assessment reflects a failing physical sub-indicator, based on a score of points Prospect Village (58), Wilson Homes (42), Donnelly Homes (53), Josephson Apartments (72) and Rush Crossing (91) points (of 100); and

WHEREAS, the Act requires HUD and each Troubled Public Housing Agency (“Troubled PHA”) to enter into a recovery agreement that establishes: performance targets; strategies for meeting targets; and incentives or sanctions for effective implementation of such strategies intended to improve the Troubled PHA’s performance such that the agency is no longer designated Troubled; and

WHEREAS, the parties desire to correct all HUD-identified deficiencies through the implementation of this Agreement.

NOW THEREFORE, in consideration for the obligations contained herein, HUD and Trenton Housing Authority agree as follows:

General

1. Trenton Housing Authority agrees to strictly comply with all terms of this Agreement, including all performance requirements, outcomes, and deadlines in paragraphs 5 through 7 below (“Performance Requirements”).
2. HUD, in its discretion, may provide technical assistance to Trenton Housing Authority including training or contract support, in order to facilitate accomplishment of the Performance Requirements. However, Trenton Housing Authority’s compliance with this Agreement shall not be contingent on HUD’s provision of any technical assistance or other discretionary assistance.
3. Trenton Housing Authority must submit Progress Reports to HUD commencing 30 days after execution of the Agreement, and every 30 days thereafter until this Agreement is terminated. Each Progress Report, including any supporting documentation, must describe the status of Trenton Housing Authority’s activities such that HUD can adequately monitor Trenton Housing Authority’s progress toward the Performance Requirements.
4. Notwithstanding any Performance Requirements, consistent with section 6(j)(3)(B)(ii) of the Act and 24 C.F.R. 902.75(d), and subject to the waivers and alternate requirements under PIH Notice 2021-14 (HA) 11(a) and 12(d), Trenton Housing Authority agrees to:
 - a. improve its performance by at least 50% of the difference between the initial PHAS assessment score that led to the Troubled designation and the score necessary to remove the PHA’s Troubled designation by the first released PHAS assessment for fiscal years ending on or after 12/31/2025; and
 - b. improve its performance and achieve an overall PHAS score of at least 60% of the total points available by the next sequential fiscal year PHAS assessment.

Consistent with paragraph 9 below, failure by Trenton Housing Authority to comply with the PHAS assessment improvement requirement in this paragraph 4 shall be a basis for HUD to find Trenton Housing Authority in substantial default under section 6(j)(3)(A) of the Act.

Performance Requirements

5. **Increase Occupancy.** Trenton Housing Authority agrees to:
 - a. For fiscal year ending 12/31/2025, increase its occupancy rate for the low rent public housing program to at least 95%, calculated by dividing Unit Months Leased (Financial Data Schedule (FDS) line item 11210) by Unit Months Available (FDS line item 11190), approved unaudited and approved audited FDS submission; or
6. **Improve Physical Condition of Dwelling Units.** Trenton Housing Authority agrees to:

- a. For any developments scoring less than 60% on their individual physical inspection reports on the first released PHAS assessment for fiscal years ending on or after 12/31/2025, Trenton Housing Authority shall:
 - i. Procure a physical needs assessment (“PNA”) from a qualified third -party vendor within 12 months of receiving the score; and
 - ii. Work with the PNA vendor to program the identified capital projects, based on available funding from the HUD Capital Fund Program, in the Capital Fund 5-Year Action Plan; and
 - iii. Select a project delivery method (e.g., design-bid-build, design-build, construction manager at risk) to undertake the capital projects identified in the agency’s Capital Fund 5-Year Action Plan for each of the specified developments scoring less than 60%, no later than six months after receipt of the PNA report; and
 - iv. Make the contract award no later than six months after selection of the project delivery method.
- b. For the first released PHAS assessment for fiscal years ending on or after 12/31/2025, Trenton Housing Authority shall:
 - i. Increase the physical sub-indicator (“PASS”) on the PHAS assessment to at least 24 out of 40 possible points, or 60%; or

7. Improve Financial Performance. Trenton Housing Authority agrees to:

- a. For the first released PHAS assessment for fiscal years ending on or after 12/31/2025, the Trenton Housing Authority shall increase the Financial sub-indicator (“FASS”) on the PHAS assessment to at least 15 out of 25 possible points, or 60%; or

8. Reposition Public Housing. Trenton Housing Authority agrees to develop a repositioning, capital improvement and sustainability plan for its entire public housing portfolio.

- a. Within 12 months after the execution of this Agreement, Trenton Housing Authority must submit this plan to HUD with associated actions and timelines.

Term

9. This Agreement begins on the Effective Date and will continue until the later of: (A) Trenton Housing Authority fulfilling all Performance Requirements; or (B) Trenton Housing Authority improving its performance pursuant to paragraph 4 of this Agreement.

Default and Remedies

10. Failure of Trenton Housing Authority to strictly comply with the terms of this Agreement, including failure to meet any discrete Performance Requirements, shall constitute a default under this Agreement and shall be a basis for a determination of substantial default by HUD under section 6(j)(3)(A) of the Act. Good faith effort on behalf of Trenton Housing

Authority shall be considered before any further action is taken by HUD pursuant to 24 C.F.R. 907.5. The following will be considered good faith effort: substantial improvement in key performance requirements that improve the current status of the agency.

11. In making a determination of substantial default, HUD will do so in compliance with the procedures in 24 C.F.R. 907.5. The notice of substantial default pursuant to 24 C.F.R. 907.5(a) shall constitute the notice of default under this Agreement.
12. If Trenton Housing Authority is determined to be in substantial default after breaching this Agreement, HUD may seek any available remedy, including any one or several of the following actions consistent with the Act and its implementing regulations:
 - a. Solicit competitive proposals from other PHAs and private housing management agents to manage all or part of Trenton Housing Authority's public housing program and project(s);
 - b. Petition for the appointment of a judicial receiver for Trenton Housing Authority;
 - c. Solicit competitive proposals from other PHAs and private entities with experience in construction management to oversee implementation of Trenton Housing Authority's public housing Capital Fund;
 - d. Take possession of all or part of Trenton Housing Authority, including all or part of its public housing program and project(s);
 - e. Require Trenton Housing Authority to make any other arrangements acceptable to HUD, in its full discretion, for managing all or part of the public housing program and project(s).
13. Notwithstanding anything in this Agreement, HUD retains its full discretion to exercise any rights available under applicable law, including those in section 6(j) of the Act, to make a determination of substantial default or take any available remedial action against Trenton Housing Authority, regardless of Trenton Housing Authority's compliance with the terms of this Agreement.
14. HUD's exercise or non-exercise of any available rights or remedies under this Agreement or any applicable law will not be construed as a waiver of HUD's right to exercise that or any right or remedy at any time.
15. This Agreement does not in any way contemplate money damages for breach of this Agreement by HUD.

Modifications, Amendments, and Changed Circumstances

16. This Agreement contains the complete and final expression of the recovery agreement between the parties and supersedes any other oral or written proposals, negotiations, conversations, discussions, or agreements between the parties related to the recovery agreement.

17. This Agreement does not supersede, modify, or amend the ACC between HUD and Trenton Housing Authority, or in any way excuse Trenton Housing Authority from complying fully with its obligations under the ACC. Nothing contained in this Agreement shall serve to limit, modify, or preclude HUD's right to take any remedial action under the ACC.
18. This Agreement may only be modified or amended by a written instrument signed by all of the parties expressly stating that such instrument is intended to modify or amend this Agreement. Any modification or amendment shall be limited to the provisions of this Agreement specifically referred to therein and shall not be deemed a modification or amendment of any other provision.
19. Modification or amendment of this Agreement shall not constitute a waiver of the applicable statutory or regulatory requirements.
20. Should any provision of this Agreement be determined to be invalid or unenforceable by any statute, regulation, or judicial ruling, such determination shall not affect any other provision of this Agreement to the extent that the Agreement shall remain operable, enforceable and in full force and effect to the extent permitted by law. Accordingly, each obligation imposed by this agreement should be construed as severable from the others to the extent it is practicable.
21. The parties shall not be responsible for any failure to implement the terms of this Agreement due to unforeseen and unavoidable circumstances outside of their control, provided that the failure to perform is excused by HUD in writing.
22. To the extent authorized by the Act and HUD regulations, and notwithstanding any other provision of this Agreement, HUD has the total discretion to unilaterally amend this Agreement to address changed factual circumstances affecting the PHA's implementation of this Agreement and, more generally, its programs.

Conflicts

23. In the event of any conflict between the provisions of this Agreement and public housing requirements, including but not limited to the Act, applicable regulations, and the ACC, as those requirements may be amended from time to time, the public housing requirements shall prevail. HUD reserves the right to determine and resolve any such conflict.

No Third-Party Beneficiaries

24. This Agreement confers no rights or remedies upon any person or entity other than HUD or Trenton Housing Authority.

Miscellaneous

25. No provision, term, or language contained in this Agreement shall be construed by any Court against HUD for having drafted the agreement. Further, this Agreement shall be read consistently with all applicable federal statutes, regulations, the ACC, or interpretive rule. If the agreement may not be read consistently with a statute, regulation, ACC, or

interpretive rule, then the statute, regulation, ACC, or interpretive rule shall control. This Agreement places the exclusive authority with HUD to determine and reconcile any conflict.

26. Any citation of law in this Agreement includes the application of any succeeding law, regulation, ACC, or interpretive rule such as a PIH notice.
27. The parties agree that any cost related to their compliance with this Agreement shall be their individual responsibilities.
28. This Agreement may be executed and delivered in separate counterparts, which, when so executed and delivered, shall be deemed an original.
29. This Agreement may be executed electronically, and electronic signatures must be treated in all respects as having the same force and effect as handwritten or original signatures.
30. HUD and Trenton Housing Authority (their employees, subcontractors, partners or assigns) shall comply with all applicable federal, state, and local laws and regulations, as amended from time to time during the term of this Agreement, in the execution of this Agreement.

IN WITNESS WHEREOF, the parties or their duly authorized representatives hereby execute this Agreement on the date first written above.

Signature Page Follows

UNITED STATES DEPARTMENT OF HOUSING
AND URBAN DEVELOPMENT

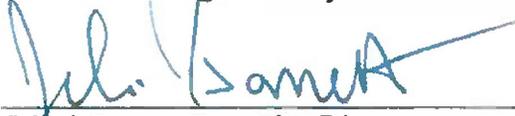
HOWARD CUMME

Digitally signed by: HOWARD CUMME
DN: CN = HOWARD CUMME C = US O = U.S.
Government OU = Department of Housing and Urban
Development, Office of Public and Indian Housing
Date: 2025.02.26 07:03:32 -05'00'

By: _____
Howard Cumme
Public Housing Director
Newark Field Office

Trenton Housing Authority

By: 
Darlene Weldon-Gordon
Board Chairperson
Trenton Housing Authority

By: 
Jelani Garrett Executive Director
Trenton Housing Authority

ATTACHMENT B.1 (b)

**Revision of Existing PHA Plan Elements
Significant Amendments / Modifications**

PHA Plan Amendment

Significant Amendment: Rental Assistance Demonstration (RAD) Project Based Voucher Conversions

The Trenton Housing Authority is amending its (annual and/or 5-year) PHA Plan because it has applied to HUD to be an applicant in the Rental Assistance Demonstration (RAD). If the Trenton Housing Authority is successful, as a result, the application the Trenton Housing Authority will be converting to Project Based under the guidelines of H 2019-09/PIH 2019-23 (HA), REV-4 and any successor Notices. Upon conversion to Project Based Vouchers the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of H 2019-09/PIH 2019-23 (HA), REV-4; and H-2016-17/PIH-2016-17.; These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the Trenton Housing Authority certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Trenton Housing Authority with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Trenton Housing Authority may also borrow funds to address their capital needs. The Trenton Housing Authority for its **Donnelly Homes site** will not be contributing Operating Reserves, and it will contribute 2.5 million dollars of Capital Funds towards the **Donnelly Homes site** conversion, and/or Replacement Housing Factor (RHF) Funds allocated to the Trenton Housing Authority, if any, towards the conversion. The Trenton Housing Authority has debt under the Capital Fund Financing Program. This debt will be paid in full by the end of 2025 through its normal payments.

This proposed amendment provides additional information as required by HUD concerning The Trenton Housing Authority's RAD portfolio conversion plans. It is the Trenton Housing Authority's intention to incorporate this proposed amendment in its entirety into the next annual plan. Further, the Trenton Housing Authority notes that the intention to convert under RAD to PBV for Donnelly Homes is part of a HUD approved Choice Neighborhood Implementation Grant. It has been discussed at multiple Resident Advisory Board Meetings (RAB) meetings and contained within the resulting annual plan submission. The Trenton Housing Authority held multiple meetings at Donnelly Homes Community Room where the RAD conversion was reviewed as part of the Choice Neighborhood redevelopment.

Below, please find specific information on public housing development(s) selected for RAD:

Development #1

<u>Name of Public Housing Project:</u> Donnelly Homes	<u>PIC Development ID:</u> NJ005000003	<u>Conversion type:</u> PBV	<u>Transfer of Assistance:</u> Up to 88 units
Total Units:	Pre- RAD Unit Type (i.e., Family, Senior, etc.):	Post-RAD Unit Type if different (i.e., Family, Senior, etc.)	Capital Fund allocation of Development:
376	Family	Family units 271 Senior units 105	\$2.5 million total for conversion period and The amount attributed to this project for purposes of future RAD rent calculations
Bedroom Type	Number of Units Pre-Conversion:	Number of Units Post-Conversion:	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.): Unit configurations are changing to match household. All units will be replaced
	376	376	
Studio/Efficiency	0	0	0
One Bedroom	156	160	+4
Two Bedroom	176	141	-35
Three Bedroom	44	68	+24
Four Bedroom	0	7	+7
Five Bedroom	0	0	0
Six Bedroom	0	0	0
<u>(If performing a Transfer of Assistance):</u>	(Explain any changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted) The Choice Neighborhood development is being developed in up to 6 phases. One phase is a senior phase which will be for households 62 and over, The remaining 5 phases will remain family. Up to 88 units will be developed by others outside the CNI neighborhood (Transfer of Assistance). These 88 units may ultimately be developed through the traditional Section 8 PBV program. The units will be within 25 miles of the CNI neighborhood.		

The RAD conversion of Donnelly Homes will take place in up to six phases as it is part of the Donnelly Homes Choice Neighborhood Implementation Grant redevelopment plan. All replacement units will be newly constructed. The existing units at Donnelly Homes will be demolished. The units will be replaced in each phase as follows:

REPLACEMENT UNITS	1 BED UNIT	2 BED UNIT	3 BED UNIT	4 BED UNIT	TOTAL UNITS
Phase 1 family	105	0	0	0	105
Phase 2 senior	39	35	2	3	79
Phase 3 family	6	21	8	2	37
Phase 4 family	5	20	7	1	33
Phase 5 family	5	21	7	1	34
Phase 6 Family	0	44	44	0	88
Total Replacement Units	160	141	68	7	376

In addition to replacing all 376 public housing units with 376 PBVs, the redevelopment will include an additional 226 affordable rental units and 37 market rate rental units. Bedroom configurations listed in the above chart may be modified to reflect the needs of the existing Donnelly Homes residents with respect to their relocation needs as well as wait list needs.

The PHA intends to use the RAD Section 18 RAD Blend in the redevelopment.

PBV Resident Rights and Participation

1. No Rescreening of Tenants upon Conversion. Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.³ Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, Section 8(o)(4) of the 1937 Act and 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, HUD waives Section 8(o)(4) and 24 CFR § 982.201 to the extent necessary for this provision to apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR Part 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.¹

¹ These protections (as well as all protections in this Notice for current households) also apply when a household is relocated to facilitate new construction or repairs following conversion and subsequently returns to the Covered Project.

2. Right to Return. See Section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

3. Phase-in of Tenant Rent Increases. If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10 percent or \$25, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "Calculated PBV TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1 (the first recertification following conversion), as illustrated below.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full Calculated PBV TTP

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP

- Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications – Full Calculated PBV TTP

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

4. Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Public Housing residents that are currently FSS participants will continue to participate in the PHA's FSS program. The PHA may continue to use any FSS funds already awarded to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.² Further upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

² The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

For information on FSS PIC reporting requirements for RAD conversions, see Notice PIH 2016-08 at <http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016-08.pdf>.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a non-profit or local Resident Association and this consequence of a RAD conversion may impact those entities.

5. Resident Participation and Funding. In accordance with Attachment 1B, residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

6. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum (HUD Form 52530-c), as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

- i. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD and to non-RAD PBV units located at the Covered Project. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:
 - a. A reasonable period of time, but not to exceed 30 days:
 - i. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - ii. In the event of any drug-related or violent criminal activity or any felony conviction;
 - b. Not less than 30 days in the case of nonpayment of rent; and

- c. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such a shorter period shall apply.
- ii. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For termination of assistance and several other PHA determinations, PBV program rules require the PHA to provide an opportunity for informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- a. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v),³ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - i. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
 - ii. For any additional hearings required under RAD, the Project Owner will perform the hearing.
- b. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
- c. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- d. The Project Owner provides an opportunity for an informal hearing before an eviction.

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

³ § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Same Covered Project shall be subject to the terms of this provision.

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

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 24 CFR § 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenants (e.g., tenants that move into the property following conversion or tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Same Covered Project shall be subject to the terms of this provision.

8. Jobs Plus. Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance at that site unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project. Job Plus is not applicable to the Trenton Housing Authority.

9. When Total Tenant Payment Exceeds Gross Rent. Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds

the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. When the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice.⁴ In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Same Covered Project shall be subject to the terms of this provision.

Unless a waiver is requested and approved as described below, any new admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has left the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating units have been permitted, Section 1.6.B.10 of the Notice.

A PHA may request a waiver from HUD for the Covered Project in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not made a housing assistance payment for a family in 180 days.

For a Covered Project that consists of 100 percent RAD PBV units, the PHA must demonstrate that a waiver is necessary in order to avoid an undue concentration of poverty at the Covered Project. A PHA may evidence this by providing data showing, for example:

- how eligible income-certified applicants on the waiting list must be passed over because their incomes result in zero HAP at admission causing a higher concentration of poverty at the covered project: or

⁴ For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

- how the income of newly admitted families is causing a markedly higher concentration of poverty than the PHA's non-RAD PBV Projects.

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

For any other Covered Project, the PHA must demonstrate that the property contains specific units (e.g., units suitable for large families or accessible units) for which there are insufficient alternative housing opportunities.

If the waiver is approved, the new admission[s] families covered under the waiver are participants under the program and all the family obligations and protections under RAD and PBV apply to the family, and the unit is subject to all program requirements. Such waiver requests should be submitted to the PIH Field Office in accordance with Notice PIH 2018-16.

10. Under-Occupied Unit. If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR § 983.260 is waived for current residents remaining or returning to the Covered Project. MTW agencies may not modify this requirement. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

PBV: Other Miscellaneous Provisions

- 1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
- 2. Ongoing PHA Board Review of Operating Budget.** The Owner must submit to the administering PHA's Board the operating budget for the Covered Project annually. The PHA's Board must confirm that the Project Owner is making deposits into the Reserve for

Replacement account in accordance with the RCC as well as assessing the financial health of the Covered Project.⁵

3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** This section has been moved to 1.4.A.13 and 1.4.A.14.

4. **Establishment of Waiting List.**

24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:

- i. Transferring an existing site-based waiting list to a new site-based waiting list.
- ii. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
- iii. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
- iv. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

⁵ For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of monitoring and evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).⁶

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

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

- 5. Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from

⁶ For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.

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

7. **Administrative Fees for Public Housing Conversions During the Year of Conversion.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds. For example, if the project’s assistance converts effective July 1, 2015, the public housing ACC between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV HAP Contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.

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

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

8. **Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant-based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing the following alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD: The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventor turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households are received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) of the Act and 24 CFR § 983.261(c). Please note that this alternative requirement does not apply to PBVs entered outside of the context of RAD. MTW agencies may not alter this requirement.

9. **Reserve for Replacement.** The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account or similar instrument, as approved by HUD, where funds will be held by the Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines.
10. **Initial Certifications and Tenant Rent Calculations.** The Contract Administrator uses the family's public housing tenant rent (reflected on line 10f of the family's most recent HUD Form 50058) at the date of the conversion to calculate the PBV HAP and tenant rent until the effective date of the earlier of the family's first regular or interim recertification following the date of conversion. At the earlier of the family's first regular or interim recertification, the Contract Administrator will use the family's TTP based on the recertification and the HCV utility allowance (or the PBV site-specific utility allowance, if applicable) to determine the PBV HAP and tenant rent. This means that the family pays

the same tenant rent as the family was paying under the public housing program until the earlier of first regular or interim reexamination following conversion, at which point the normally applicable PBV calculation for the tenant rent becomes effective. (Under the PBV program, the monthly HAP is the rent to owner minus the tenant rent, and the tenant rent is the family TTP minus the utility allowance.) To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same property as the Covered Project shall be subject to the terms of this provision. To effectuate this provision, HUD is waiving 24 CFR 5.601 and 983.3(c)(6)(iii).

The Trenton Housing Authority is not proposing any transfer of assistance at the time of conversion.

The Trenton Housing Authority is not currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and an assurance that compliance will not be negatively impacted by conversion activities.

The Trenton Housing Authority certifies that the RAD conversion complies with all applicable site selection and neighborhood reviews standards and that all appropriate procedures have been followed.

All other required information and certifications necessary to submit a Significant Amendment to the PHA Plan, including Resident Advisory Board comments and responses, challenged elements, and all required certifications have been complied with.

The Trenton Housing Authority shall not consider any of the following to be a Substantial Deviation from the PHA Plan: The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance; 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; Changes to the construction and rehabilitation plan for each approved RAD conversion; and Changes to the financing structure for each approved RAD conversion

Attachment: Joint Housing/PIH Notice H-2016-17/PIH-2016-17

ATTACHMENT B.1 (c)

Deconcentration Policy

Deconcentration Policy

If at annual recertification, there is found to be development(s) with average income above or below the EIR, and where the income profile for a general occupancy development above or below the EIR is not explained or justified in the THA Plan, the THA shall list these covered developments in the Annual Plan.

The THA shall adhere to the following policies for deconcentration of poverty and income mixing in applicable developments:

Skipping a family on the waiting list to reach another family in an effort to further the goals of the THA deconcentration policy.

If a unit becomes available at a development below the EIR, the first eligible family on the waiting list with income above the EIR will be offered the unit. If that family refuses the unit, the next eligible family on the waiting list with income above the EIR, or if no family with income above the EIR accepts the offer, then the unit will be offered to the first eligible family on the waiting list in preference order regardless of income.

Skipping of families for deconcentration purposes will be applied uniformly to all families.

A family has the sole discretion whether to accept an offer of a unit made under the THA's deconcentration policy. The THA shall not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the THA's deconcentration policy. However, the THA shall uniformly limit the number of offers received by applicants described in this Chapter.

Deconcentration Compliance

If, at annual recertification, the average incomes at all general occupancy developments are within the EIR, the THA will be considered to be in compliance with the deconcentration requirement.

ATTACHMENT C.1

Resident Advisory Board (RAB)



Clifford Godfrey
Executive Director

The Trenton Housing Authority's senior management convened a meeting with the Resident Advisory Board (RAB) on Wednesday, August 20, 2025. The purpose of the meeting was to review the Authority's programs, initiatives, and strategic plans for 2026 and the subsequent five-year period (2026-2030). Key updates were provided on the North Trenton Battle Monument Choice Neighborhood Implementation Project and Frazier Court II.

The RAB representatives concluded the meeting by expressing satisfaction with the Authority's direction and did not present any significant comments regarding the plan.

RESOLUTION NO. 25-30

RESOLUTION OF THE HOUSING AUTHORITY OF THE CITY OF TRENTON (THA) APPROVING AND AUTHORIZING ITS EXECUTIVE DIRECTOR TO SUBMIT THE FIVE YEAR FOR FISCAL YEAR (FY) 2026 - 2030 AND ANNUAL PLAN FOR FY 2026 TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, the Housing Authority of the City of Trenton (THA) is required to submit the Annual Plan in accordance with Section 511 of the Quality Housing and Work Responsibility Act of 1998 (QHWRA); and

WHEREAS, the THA conducted a public hearing on September 2, 2025, in the development of that plan; and

WHEREAS, the THA has an established Resident Advisory Board (RAB), the membership of which represents the residents assisted by the THA; and

WHEREAS, the THA consulted with the RAB in developing the Plan and considered the recommendations of the RAB in the Plan; and

WHEREAS, the Plan is consistent with the Consolidated (Housing) Plan of the City of Trenton; and

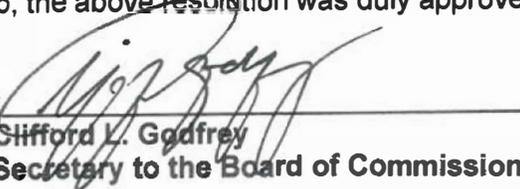
WHEREAS, the Plan meets all of the certification requirements of the U.S. Department of Housing and Urban Development:

NOW THEREFORE BE IT RESOLVED, that the Board of Commissioners of the Housing Authority of the City of Trenton approves the Five Year for Fiscal Year (FY) 2026-2030 and Annual Plan for FY 2026, and authorizes its Executive Director to submit said Plan to the U.S. Department of Housing and Urban Development.

Signed: 
Darlen Weldon-Gordon
Chairperson, Board of Commissioners

Date: September 10, 2025

I, Clifford L. Godfrey, Secretary to the Board of Commissioners of the Housing Authority of the City of Trenton, hereby certify that at a meeting of the Board of Commissioners held on September 10, 2025, the above resolution was duly approved.

Signed: 
Clifford L. Godfrey
Secretary to the Board of Commissioners

Date: September 10, 2025

ATTACHMENT C.3

Civil Rights Certification
Form HUD-50077-ST-HCV-HP

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires: 09/30/2027

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or Annual PHA Plan, hereinafter referred to as "the Plan," of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 1/2026, in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

1. 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 (24 CFR § 91.2).
2. The Plan contains a signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies, for the PHA's jurisdiction and a description of the way the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the Resident Advisory Board (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the way the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - i. The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - ii. The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - iii. The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours. Where possible, PHAs should make documents available electronically, for public inspection upon request.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment. The PHA ensured all notices and meetings provided effective communication with persons with disabilities and further provided meaningful language access for persons with Limited English Proficiency (LEP).
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), Title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, the Violence Against Women Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of all HUD programs.
7. The PHA will affirmatively further fair housing, in compliance with the Fair Housing Act, 24 CFR § 5.150 et seq., 24 CFR § 903.7(o), and 24 CFR § 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering

fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR § 5.151). Pursuant to 24 CFR § 903.15(c)(2), a PHA's policies should be designed to reduce the concentration of tenants and other assisted persons by race, national origin, and disability. PHA policies should include affirmative steps stated in 24 CFR § 903.15(c)(2)(i) and 24 CFR § 903.15(c)(2)(ii). Furthermore, under 24 CFR § 903.7(o), a PHA must submit a civil rights certification with its Annual and 5-year PHA Plans, except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document. The PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module and/or its successor system: the Housing Information Portal (HIP) in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination based on age pursuant to the Age Discrimination Act of 1975.
10. In accordance with the Fair Housing Act, the PHA will not base a determination of eligibility for housing on actual or perceived sexual orientation, or marital status and will not otherwise discriminate because of sex (including sexual orientation).
11. The 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' for people with physical disabilities.
12. The 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 135.
13. The PHA will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implement the regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. With respect to public housing the 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.
17. The PHA will keep records in accordance with 2 CFR 200.302 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.

20. The 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 regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to always be available at all locations that the PHA 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 PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA and, where possible, should be made available for public inspection in an electronic format.
22. The PHA certifies that it is following all applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the City of Trenton

NJ005

PHA Name

PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2026

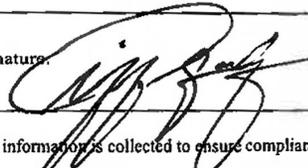
5-Year PHA Plan for Fiscal Years 2026 - 2030

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, 1014; 31 U.S.C. §3729, 3802)

Name of Executive Director:
Clifford L. Godfrey

Name Board Chairman:
Darlene Weldon-Gordon

Signature:



Date: ^{10/2025}
9/10

Signature:



Date: **9/10/2025**

This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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



PUBLIC NOTICE

The Housing Authority of the City of Trenton (THA) invites the public to an informational meeting regarding its 2026-2030 Five-Year & 2026 Annual Plan. This hybrid meeting will take place on Tuesday, September 2, 2025, at 2:00 PM. Attendees can join in person at the THA Administration Building or virtually via the link provided below. Please email any questions to administration@tha-nj.org at least 48 hours before the meeting.



<https://tinyurl.com/2kakw56s>

THA Administration Building
875 New Willow Street, Trenton, NJ 08638

A DRAFT COPY OF THE ANNUAL PLAN IS AVAILABLE FOR REVIEW ON THE WEBSITE, www.tha-nj.org, IN THE ADMINISTRATION OFFICE AND AT THE HOUSING PROPERTY SITE MANAGEMENT OFFICES AFTER AUGUST 21, 2025.